

EG Australia

2021 Modern Slavery Statement

1. Introduction

The *Modern Slavery Act 2018* (Cth) (the **Act**) requires certain entities to report annually on the risks of modern slavery in their operations and supply chains. In compliance with this obligation this Modern Slavery Statement (**Statement**) is made by EG Fuelco (Australia) Limited ACN 627 348 645 and EG Group Australia Pty Ltd ACN 629 792 810 and its related bodies corporate (**EG Australia, we or us**):

This Statement sets out:

- our structure, operations and supply chains;
- our policies which address the risks of modern slavery;
- the actions taken by us during the financial year ending 31 December 2020 to identify, address and minimise modern slavery risks in our operations and supply chains (including due diligence and remediation processes); and
- how we assess the effectiveness of these actions.

This Statement was approved by our Board of Directors at its 9th June 2021 meeting, and is signed by our Chief Executive Officer in accordance with the Act.

2. EG Australia structure, business, operations and supply chains

Our structure

EG Australia is a wholly owned subsidiary of EG Group Limited (**EG Group**) headquartered in Blackburn, United Kingdom. EG Group is a leading global independent convenience retailer with a diversified portfolio of over 6,000 sites across ten countries in North America, Europe and Australia, supported by over 44,000 employees globally.

In 2019, EG Group acquired the petrol business of Woolworths Limited. As part of the transaction, Woolworths Limited and EG Group entered into a 15-year commercial alliance covering fuel discount redemption and loyalty.

Today, EG Australia owns and operates 539 fuel and convenience sites, and currently employs more than 4,300 people nationwide.

Our operations

We employ most of our team members directly and on permanent contracts. This reduces the risk of modern slavery within EG Australia. We also recognise the risk of modern slavery in areas of our business that use third party contractors. Several of these contracted parties may engage migrant workers, international students or other groups who might not be aware of their rights and be susceptible to exploitation. Although we do not have direct control over the employment terms of these contracted parties we strive to ensure that all of our contracted parties meet our policy and pre-qualification requirements before engagement, and where appropriate, seek that they provide warranties to us that they comply with all laws in relation to employment matters.

Our Supply Chains

Our supply chain consists of trade suppliers and non-trade suppliers.

Our trade suppliers provide the products we sell in fuel and convenience retail operations, including fuel, food, beverages, tobacco products, automotive supplies, apparel and general merchandise.

Our non-trade suppliers provide goods and services to support our internal operations. Our largest non-trade categories include repairs and maintenance providers, Information Technology, construction, logistics, packaging and marketing.

The majority of our goods/services are supplied by Australian businesses.

We expect our trade suppliers, non-trade suppliers, partners and stakeholders to adhere to ethical business conduct consistent with our own, and are committed to working with them to ensure their goods, materials and related supply chains are:

- fully compliant with all applicable labour laws and regulations, including the Act;
- transparent, accountable and auditable;
- free from ethical ambiguities;
- free from forced, compulsory or child labour; and
- free from discrimination in the workplace.

We communicate our expectations through a variety of channels, including supply or service agreements, tender and supplier due diligence documents and our Speak-Up and Responsible Sourcing policies available on our website.

Individuals with evidence of non-compliance within our supply chains are encouraged to follow the reporting procedure outlined in our Speak-Up Policy.

Our Policies

Responsible Sourcing Policy

Our Responsible Sourcing Policy reflects our commitment to acting ethically and with integrity in all our business relationships and that our suppliers are aligned to our values. This policy applies to our suppliers, employees at all levels, contractors, external consultants, third-party representatives and business partners. Each member of our executive team monitors and evaluates the implementation and effectiveness of this policy with respect to their area of responsibility.

Code of Conduct

We encourage a culture of openness and accountability through our Code of Conduct. Under our Code of Conduct, we expect all team members to maintain high standards, and to speak up and provide feedback when they see activity or behaviour that they feel is wrong or does not match our ways of working.

Speak-Up Policy

Our Speak-Up Policy sets out the procedure for our staff to speak up confidentially to raise genuine concerns about misconduct in our business or operations without fear of reprisal, and includes an external reporting hotline for our staff and suppliers to use.

3. Identifying Risks of Modern Slavery Practices

We recognise that modern slavery risks can occur in both our Australian and overseas supply chains. Risks of modern slavery in global retail operations and supply chains are dynamic and complex. We are constantly reviewing risks to prioritise our efforts where there is greatest impact to people in our operations and supply chain.

The risk of modern slavery practices are most prevalent where:

- service providers use unskilled or seasonal labour, or foreign or temporary workers, for example, in the construction industry;
- products are sourced from high-risk countries;
- there are poor governance structures within the organisation;
- there are poorly managed procurement or auditing processes; and
- there is a lack of awareness and training within the organisation.

We have conducted a risk assessment to understand the modern slavery risks in our operations and our supply chain and have identified that there could be a potential risk in our extended supply chain due to the geographical locations from which certain goods (or raw materials to manufacture such goods) or services are sourced or the prevalence of sub-contractors within the relevant sector. .

We intend to now proceed to individually assess suppliers that fall within the potential risk area in our extended supply chain. That assessment is ongoing. We have recently issued questionnaires to our suppliers to understand their individual risks more clearly

4. Actions Taken

We have taken the following actions, and continue to take these actions, to assess and address the risks of modern slavery practices in our operations and supply chain:

- Mapping Supply Chain and operations:* Mapping of our supply chain and operations to identify high risk areas;
- Vendor Due Diligence:* Introduced vendor due diligence/ integrity checks to identify any risks and appropriate control procedures in the vendor on-boarding or renewal process, and require our large suppliers to provide their own Modern Slavery Statements and policies;

- C. *Responsible Sourcing Policy, Speak Up policy and Code of Conduct:* Established a Responsible Sourcing Policy, Speak Up Policy and a Code of Conduct that reflects our commitment to act ethically and with integrity in all our business relationships, and to implement and enforce effective systems and controls to ensure compliance. Our Responsible Sourcing Policy and Speak Up Policy is available on our website;
- D. *Employee Training:* We commenced a mandatory modern slavery online training program for all our staff, including those involved in procurement decisions in (December) 2020. The training was introduced to help our staff understand the meaning and general indicators of modern slavery and ensure that all of them have a high level understanding of our supply chains and businesses.

We seek to ensure 100% compliance of our employees with our training program, by continuously monitoring and auditing completion of training by all our staff.

Our commitment to ensure awareness does not stop with our staff, consequently, we communicate our expectations of compliance with modern slavery obligations to all our business partners. We also encourage them to provide adequate training to their own staff, suppliers and providers.

- E. *Whistleblower Protection Communication Channel:* Implemented a process to ensure protection for whistleblowers who make a report in connection to unethical sourcing or modern slavery practices within our organisation. We have also opened an effective communication channel (including, a confidential and anonymous whistle-blower line) for concerns or disclosure in relation to modern slavery and processes in place to investigate and report on matters raised through this channel; and
- F. *Vendor Contractual Obligations:* Included clauses in all new supply contracts to ensure that all our vendors, suppliers or service providers comply with modern slavery law, including a provision for reserving rights to audit our business partners' operations, facilities and working conditions, procedures and systems to ensure compliance with the Act.

G. *Modern Slavery Questionnaire:* Where practicable, we require our business partners, suppliers and contractors to complete a self-assessment modern slavery due diligence questionnaire and/or warrant that there are no risks of modern slavery practices within its own supply chain or operations.

5. Commitment to Continuous Improvement

We consistently monitor and assess the risks and by way of continuous improvement will strive towards:

- assessing the potential modern slavery risks in our operations and supply chains with emphasis on high risk geographical locations and business transactions;
- conducting due diligence on local and global supply chains;
- reviewing supplier contracts to ensure they contain terms that are consistent with the Act;
- taking steps to address any potential modern slavery risks identified;
- collaborating with suppliers to encourage sharing of information around modern slavery risks and ongoing communication and continuous improvement to achieve compliance if any breaches of this Statement are identified; and
- measuring effectiveness through performance monitoring.

6. Assessing Effectiveness

We review the effectiveness of our management of modern slavery risk by:

- investigating and analysing complaints, reports and grievances made through our whistleblowing mechanisms;
- reporting bi-annually on complaints, potential trends, and risk areas to the Speak-Up Committee and the Board;
- preparing group level Environmental, Social, and Corporate Governance quarterly reports;
- conducting our internal audit program;
- conducting reviews of the systems, processes, personnel and work methods used by our suppliers;
- continuous development of training and initiatives to maintain awareness within our organisation; and

- publicly communicating this Statement so our employees and suppliers have a clear understanding of our policies, expectations and future commitments to reduce the risks of modern slavery.

7. Process of consultation

This Statement reflects the position of EG Australia. All entities within EG Australia work under a common set of policies and programs relating to modern slavery. A process of consultation across various departments helped to guide the drafting of this Statement.

8. Document control

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Mike McMenamin
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EG Australia