



MODERN SLAVERY STATEMENT

Vantage Fuels Pty Ltd ACN 151 023 040

Reporting Year: 1 July 2021 - 30 June 2022





INTRODUCTION

We are a family business operating principally in the retail sector as an independent fuel retailer. Our business is conducted exclusively in Australia and our operations are all subject to Australia's strict regulatory framework.

Our key products are purchased from large, often multinational, suppliers (all of whom have operations directly in Australia).

The key finding from our first modern slavery statement, submitted pursuant to the Modern Slavery Act 2018 (Cth)(Act) (First Report), was that improved knowledge of our supply chain and increased supplier engagement was required to more thoroughly address and assess the risks of modern slavery in our operations and supply chain.

Our key focus for subsequent reporting years has been to develop systems and processes to enhance our understanding of our supply chain and improve supplier engagement in relation to modern slavery.

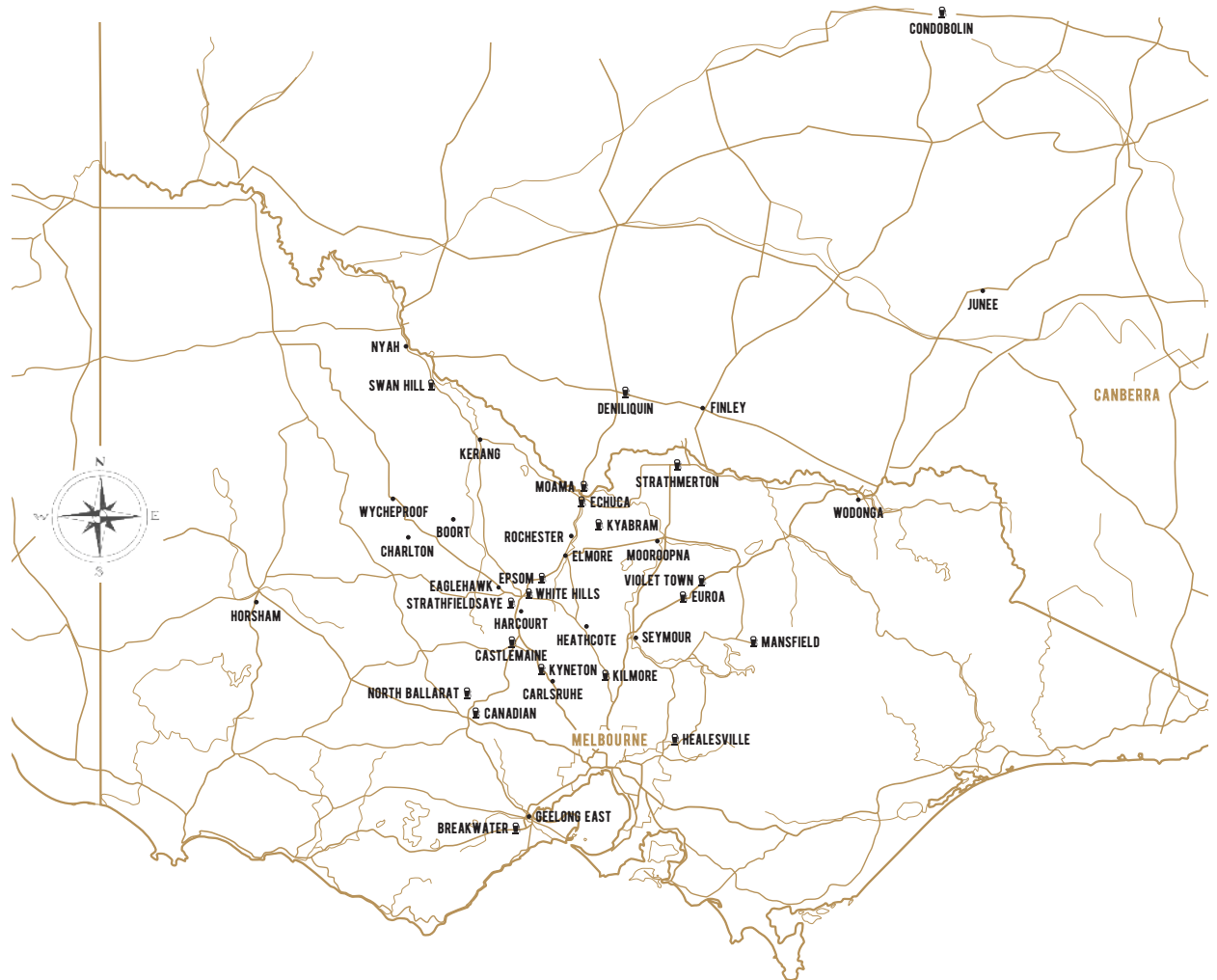
We are pleased to submit our second Modern Slavery Statement for the reporting year 1 July 2021 to 30 June 2022 in accordance with the requirements of the Act.



CHAPTER 1 - WHO WE ARE

Vantage Fuels Pty Ltd ACN 151 023 040 (Vantage/ we/ us/ our) is a privately owned proprietary company limited by shares. Vantage was incorporated in Victoria on 20 May 2011. There are two company directors of Vantage.

Vantage's registered office and principal place of business is located at 7 Woodlands Court, East Bendigo, Victoria. and part of our head-office operations are conducted from our office located in South Melbourne.





CHAPTER 2 - OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Our Operations:

Our core business is the operation of service stations including convenience stores and cafes. Our sites are located within regional Victoria and New South Wales.

We are an independent fuel retailer and fuel is supplied to our sites (either directly or indirectly) by two multinational fuel suppliers. Our cafes, trading as 'Bowser Bean Café', offer high quality, convenient food and coffee and are located within 19 of our service station sites (at the date of signing). This year, a new shop brand, Bowser Bound, was introduced to our network.

Key facts and figures:

At the time of publication:

- Vantage's network includes 37 service station sites in regional Victoria and New South Wales;
- 10 sites are operated by commission agents (the commission agents operate the "shop" component of the business and the fuel component of the business is managed by us);
- Bowser Bean Café operates within 17 sites;
- the Bowser Bound shop brand and system operates within two sites; and
- we are proud to employ approximately 20 staff in our head office and a further 280 staff in our sites.

Structure:

Vantage is the primary operating entity within a private (family) group of entities. The activities of the group are principally centered around the business operations of Vantage. Vantage does not own or control other entities.



Supply chains:

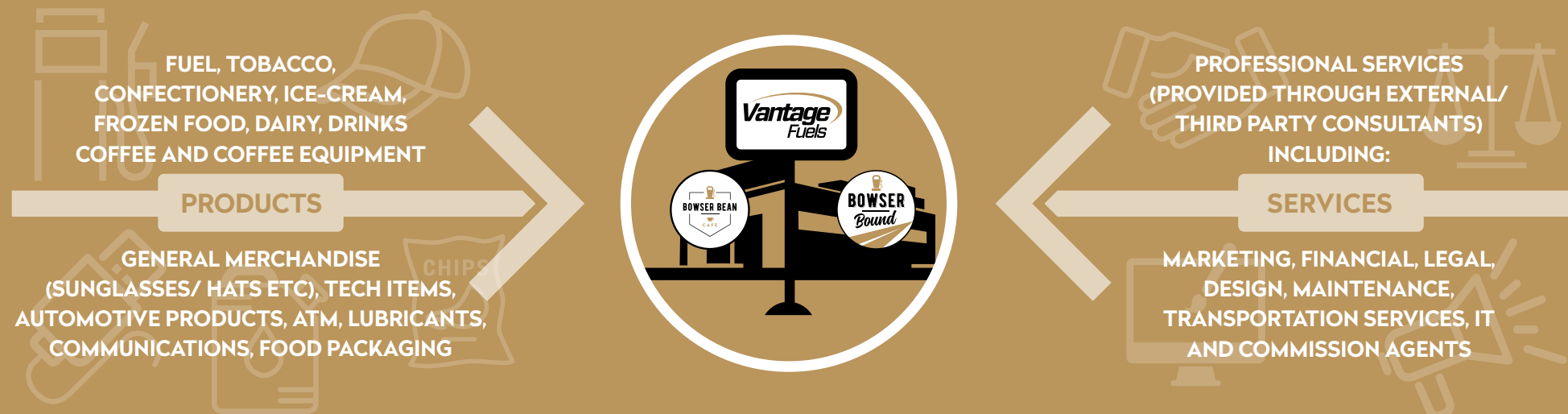
A general depiction of Vantage's supply chain is illustrated below:





Supply chains continued

The products and services that are essential to the operation of Vantage's business are illustrated below.



Supplier analysis

Our relationships with our key suppliers are generally strong, and generally longstanding. Our key products and services are all supplied by organisations who have domestic (Australian) operations (and who are regulated by Australian law).

It was noted in previous reports that, whilst our key suppliers all have domestic operations and our procurement from those suppliers takes place domestically, the raw materials or component parts used in the production and manufacture of some of our products may be sourced internationally. Continued improvement of our knowledge of our supply chain and supplier engagement is required to enable us to better understand where these component parts and raw materials are produced and/ or sourced.



CHAPTER 3 - DESCRIPTION OF THE RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAIN

Risks that we cause modern slavery in our operations

Vantage's modern slavery team have reviewed the risks of modern slavery practices in our operations and supply chain. The modern slavery team have concluded, based on this risk assessment, that the risks of modern slavery practices in our operations and supply chain have not materially changed from our previous report and these were previously identified as follows:

Our direct operations

We operate exclusively within Australia and our operations are all subject to Australian law. We foster a strong compliance culture and submit, on an annual basis, to an independent, external audit of our financial statements.

This report indicates that all relevant financial compliance standards are achieved. We also generally complete an independent audit of our safety practices and employment conditions. However this audit was interrupted during the previous year due to COVID. Based on the results of previous audits, no risk has been identified that we directly cause modern slavery.

Commission agents

Ten of our sites are operated by commission agents. We are not responsible for employing the staff at these sites. To ensure our commission agent sites are compliant with employment laws and safety requirements, our commission agents are required to submit to an annual, independent compliance audit by our industry body Australasian Convenience and Petroleum Marketers Association (ACAPMA.) These audits were also interrupted during the last reporting year due to COVID but will be re-instituted during the next reporting year.

Conclusion

Having regard to our domestic regulatory framework, the downstream position we occupy in our supply chain, the size and nature of our key suppliers and the outcome of our current and previous audits, we remain confident that neither our operations nor our conduct within our supply chain directly causes modern slavery.



Risks that we *contribute* to modern slavery practices in our supply chain

Price is one of the factors we consider when making procurement decisions. While price is not generally the sole determinant of a procurement decision, the fact that it is considered at all may (indirectly) create pressure for our suppliers to source their products or supply their services at a lower price. This, in turn, could create a risk of facilitating or contributing to modern slavery practices further up our supply chain.

Risks that we may be *directly linked* to modern slavery practices in our supply chain

We do not have direct contractual relationships with all participants in our supply chain. In these circumstances, there is an inherent risk that our operations and supply chain could be linked to modern slavery practices through the activities and conduct of other entities in our supply chain.

In previous reports, it was noted that further analysis of our supply chain (including increased supplier engagement) was required to enable us to better understand the nature and extent to which we could be directly linked to modern slavery practices through the manufacturing processes used in our supply chain and/ or the geographic source of the raw materials used in our products.

At this stage, based on supply chain information that is presently available we cannot eliminate the risk that we may be linked to modern slavery via the following causes:

Product risks and industry risks: Some products within our supply chain are manufactured using processes that are known to be associated with risks of modern slavery or within industries where there are known risks of modern slavery. Such products and/ or industries include coffee beans (used in the production of coffee), cacao (used in the production of chocolate), tobacco (used in the production of cigarettes) and the textile industry (used to produce the uniforms worn by our staff and the 'general merchandise' sold in our sites (hats/ beanies etc)).

Geographic risks: Some of the raw products used in the manufacture of products within our supply chain may be sourced from countries where there are established risks of modern slavery. Further supply chain analysis is required to enable us to better understand whether these risks may be present in our supply chain.



CHAPTER 4 - DESCRIPTION OF THE ACTIONS TAKEN TO ASSESS AND ADDRESS THE RISKS OF MODERN SLAVERY INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

The key focus for the modern slavery team for the current reporting year was enhancing our understanding of our supply chain and improving supplier engagement in relation to modern slavery.

During the 2021 reporting year, 16 Vantage sent a copy of its modern slavery policy and its supplier questionnaire to 16 key suppliers. Unfortunately only two responses were received. Rather than re-sending these documents and hoping for more responses, the modern slavery team determined that they would use the 2022 year to see if any alternate means of improving supplier engagement in relation to modern slavery were available. The modern slavery team took the following action:

Canvas involvement of industry body

We approached our industry body ACAPMA, to see if they would be interested in adopting an industry wide approach to modern slavery by formulating an industry wide modern slavery policy statement and supplier questionnaire that would be sent to key suppliers in our industry. It was suggested that adopting an industry wide approach could improve supplier buy-in as it would significantly reduce the time spent attending to individual compliance requests from retailer.

Canvas engaging a third party provider

A delegate from our modern slavery team also attended a presentation by SlaveCheck to assist us determine whether their 'Collective Intelligence SaaS solution' could assist us identify and assess the risks of modern slavery in our operations and supply chain.



2022 Year Findings

- Our industry body was unable to facilitate an industry wide approach to managing the risks of modern slavery in our operations and supply chain.
- In relation to SlaveCheck's services, it was determined, based on our current risk profile, the a paid subscription was not required at this stage but that this would continue to be reviewed.

2021 Year Conclusions and remediation

We:

- remain confident that we do not directly cause modern slavery;
- consider that we do not currently have sufficient knowledge of our supply chain to fully identify any possible links to modern slavery in our operations and supply chain;
- remain concerned, based on the downstream position we occupy in the supply chain, that we do not have sufficient leverage to meaningfully remediate any modern slavery practices if any such practices are identified in our supply chain;
- remain committed to strengthening our approach to managing the risks of modern slavery in our operations and supply chain; and
- remain committed enhancing our understanding of our supply chain and improving supplier engagement in relation to modern slavery.

Resources: Key resources that have been used by our modern slavery team are listed in Annexure 2.



CHAPTER 5 - DESCRIPTION OF HOW WE ASSESS THE EFFECTIVENESS OF ACTIONS BEING TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

At the end of each reporting year, a review is undertaken by the Vantage modern slavery team to consider the effectiveness of the actions taken in the relevant reporting year and to set the priorities for the following reporting year.

Following our assessment of the effectiveness of the actions taken during the 2022 reporting year, the principal mandate for the modern slavery team for the 2023 reporting year remains improving our knowledge of our supply chain and increasing our engagement with our suppliers in relation to the risks of modern slavery in our operations and supply chain.





APPROVAL & SIGNATURE

Vantage Fuels Pty Ltd ACN 151 023 040 (**Reporting Entity**) is governed by its two company directors, Mr Mark Tierney and Mr Haydn Tierney (collectively, **Principal Governing Body**).

This Statement has been approved by the Reporting Entity's Principal Governing Body on 30 December 2022.

Mr Haydn Tierney who is the Managing Director of the Reporting Entity has been appointed by the Principal Governing Body as the Reporting Entity's 'Responsible Member' (as that term is defined in section 4 of the *Modern Slavery Act 2018* (Cth)) (**Responsible Member**).



HAYDN TIERNEY

29/05/23

DATE

This Modern Slavery Statement is approved by the Reporting Entity's Principal Governing Body and is signed by **Haydn Tierney**, Managing Director, in his capacity Responsible Member of the Reporting Entity on the date set out above.



ANNEXURE 1 - summary of mandatory criteria from section 16 of the Act for Modern Slavery Statements

MANDATORY CRITERIA	LOCATION IN STATEMENT
Section 16(1)(a) of the Act	Chapter 1
Section 16(1)(b) of the Act	Chapter 2
Section 16(1)(c) of the Act	Chapter 3
Section 16(1)(d) of the Act	Chapter 4
Section 16(1)(e) of the Act	Chapter 5
Section 16(1)(f) of the Act	Not applicable (Vantage does not own or control other entities)
Section 16(1)(g) of the Act	Further information is set out in the introduction & in Annexure 1 & 2

ANNEXURE 2 - key resources

DESCRIPTION OF RESOURCE	HOW USED
Tackling Modern Slavery in Supply Chains A Guide 1.1 – produced by the Walk Free Foundation	Used in the preparation of the modern slavery framework, supply chain mapping and risk assessment
2018 Global Slavery Index	Used to inform our risk assessment, in particular in relation to geographic risks
US Department of Labour List of Goods Produced by Child or Forced Labour (https://resourcecentre.savethechildren.net/node/4495/pdf/4495.pdf)	Used to inform our risk assessment, in particular in relation to product risks