



# MODERN SLAVERY STATEMENT

Vantage Fuels Pty Ltd ACN 151 023 040

Reporting Year: 1 July 2020 - 30 June 2021





## 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.

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 the reporting year commencing 1 July 2020 and concluding 30 June 2021 (2021 Year) was 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 in accordance with the requirements of the Act.

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## 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. Part of our head-office operations are conducted from our office located in South Melbourne.

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## 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 (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 17 of our service station sites.

### Key facts and figures:

At the time of publication:

- Vantage's network includes 36 service station sites in regional Victoria and New South Wales;
- 11 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; and
- we are proud to employ approximately 17 staff in our head office and a further 265 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 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 our First Report 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.

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## 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

#### 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:

- (1) an independent, external compliance audit of our employment conditions and safety practices and this external audit is conducted by our industry body, Australasian Convenience and Petroleum Marketers Association (ACAPMA) (ensuring this audit is conducted by an organisation with expertise in our industry); and
- (2) an independent, external audit of our financial statements (collectively, 'Compliance Reports').

The Compliance Reports indicate that all relevant compliance standards are achieved. Moreover, the Compliance Reports do not reveal any risk that our operations directly cause modern slavery.

#### Commission agents

Eleven 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 ACAPMA.

#### 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 Compliance Reports and those of our commission agents, we are confident that neither our operations nor our conduct within our supply chain directly causes modern slavery.

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### **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 our First Report, 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.

Based on the supply chain information gathered during the 2021 Year, we cannot, at this stage, 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.

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

In the 2020 reporting year, Vantage created a modern slavery team. The team's principal mandate was to create a framework for assessing and addressing the risks of modern slavery in our operations and supply chain.

The key focus for the modern slavery team for the 2021 Year was to improve our knowledge of our supply chain and improve engagement with suppliers in relation to modern slavery. The key outcomes for the modern slavery team in the 2021 Year include:

### **External Modern Slavery Policy**

A modern slavery policy was developed for our key suppliers. The policy was designed to facilitate engagement with our suppliers in relation to the risks of modern slavery in our supply chain and seek confirmation from our suppliers that they share our commitment to reducing the risks of modern slavery in our operations and supply chain.

### **Supplier Questionnaire**

A supplier questionnaire was developed and sent to our key suppliers. The purpose of the questionnaire was to better understand our supply chain and in particular, the origin and genesis of the raw materials and component parts used in our supply chain.

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## 2021 Year Findings

During the 2021 Year:

- modern slavery policies and supplier questionnaires were developed and sent to 16 of our most critical suppliers;
- two questionnaires were returned and one supplier provided us with a link to their modern slavery statement;
- of the two questionnaires that were returned:
  - both suppliers have policies in place to manage the risk of modern slavery in their supply chain and provide modern slavery training; and
  - one instance of possible concern in relation to modern slavery was identified but a corrective plan had been put in place.

## 2021 Year Conclusions and remediation

Based on the supply chain analysis conducted to date, we:

- remain confident that we do not directly cause modern slavery;
- consider, based on the level of supplier engagement received during the 2021 Year, that we do not currently have sufficient knowledge of our supply chain to fully understand all possible risks of 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 that may be 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.

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## 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 2021 Year, the key mandate for the modern slavery team for the 2022 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.

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## APPROVAL & SIGNATURE

This statement is **approved** by both directors of **Vantage Fuels Pty Ltd** ACN 151 023 040 and is signed by Haydn Tierney as the **responsible member**:

*Haydn Tierney*

HAYDN TIERNEY

29/12/21

DATE





## 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 ( <a href="https://resourcecentre.savethechildren.net/node/4495/pdf/4495.pdf">https://resourcecentre.savethechildren.net/node/4495/pdf/4495.pdf</a> )	Used to inform our risk assessment, in particular in relation to product risks