



MODERN SLAVERY STATEMENT

Vantage Fuels Pty Ltd ACN 151 023 040

Reporting Year: 1 July 2023 - 30 June 2024





INTRODUCTION

Vantage Fuels Pty Ltd (we, us, our, Vantage) is a family business operating 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 regulatory framework.

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

Since our first modern slavery statement was submitted pursuant to the Modern Slavery Act 2018 (Cth)(Act), we have focussed on improving our knowledge of our supply chain and supplier engagement so that we are better placed to reduce, address and assess the risks of modern slavery in our operations and supply chain. This remains an ongoing focus.

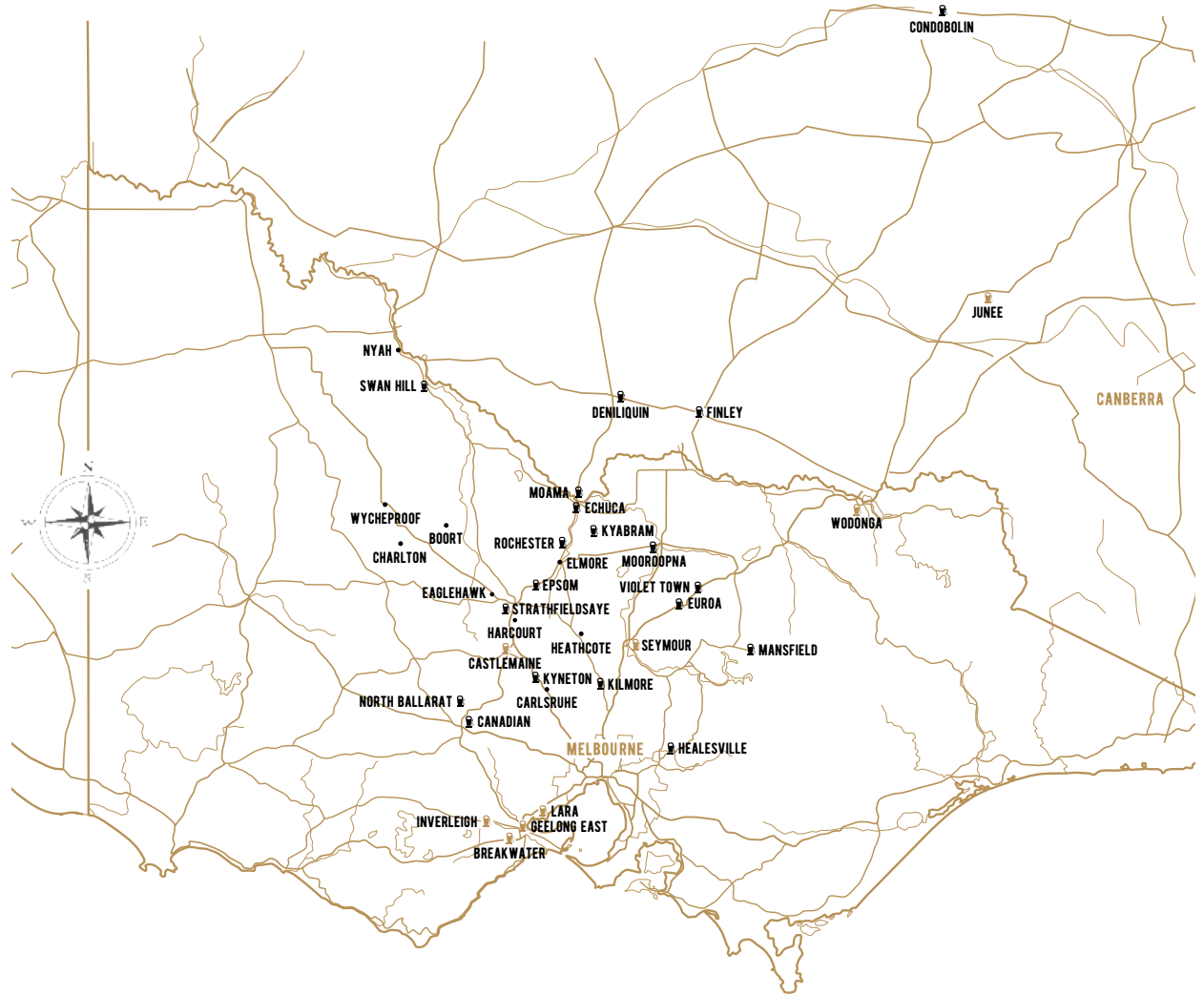
We are pleased to submit our Modern Slavery Statement for the reporting year 1 July 2023 to 30 June 2024 in accordance with the requirements of the Act.



CHAPTER 1 - WHO WE ARE

Vantage Fuels Pty Ltd ACN 151 023 040

Vantage 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. Our registered office and principal place of business is located at 578 City Road, South Melbourne, Victoria. We also operate a satellite office in Bendigo.





CHAPTER 2 - OUR STRUCTURE AND OPERATIONS

Our Operations:

Our core business is the operation of service stations including convenience stores and cafes. Our stores are located in 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, trade as either 'Bowser Bean', 'Bowser Bound' or 'Vantage Fuels'.

Key facts and figures:

At the time of publication:

- Vantage's network includes 36 service station sites in regional Victoria and New South Wales;
- 8 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);

- the Bowser Bean brand operates within 21 sites;
- the Bowser Bound brand and system operates within 3 sites; and
- we are proud to employ approximately 20 staff in our head office and approximately 500 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.



CHAPTER 3 - OUR SUPPLY CHAIN

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





The products and services that are essential to the operation of Vantage's business are depicted in the infographic below:



Supplier analysis

As noted in previous modern slavery reports, 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 previous modern slavery 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.

We remain focussed on improving our knowledge of our supply chain to enable us to better understand where these component parts and raw materials are produced and/ or sourced and how this may affect the risks of modern slavery in our operations and supply chain.



CHAPTER 4 - DESCRIPTION OF THE RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAIN

The risks of modern slavery practices being present in our operations and supply chain have been noted in previous modern slavery reports. We have reviewed these risks (which are noted below) and, based on the information currently available, have concluded that our risk profile has not materially changed since the previous reporting year. However, we confirm our ongoing commitment to improving our awareness of these risks and, where appropriate, developing systems and processes to mitigate them.

Risks that we *cause* modern slavery in our operations

Vantage's modern slavery team have identified the following risks of modern slavery in our operations and supply chain:

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. We also engage a third party to undertake a desktop audit of our payroll system and employment law compliance.

Commission agents

We are not responsible for employing the staff at sites operated by commission agents. To ensure our commission agent sites are compliant with employment laws, our commission agents are required to submit to an annual, independent audit of their employment conditions.

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

As has been noted in previous modern slavery statements, 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. To mitigate this risk, we have increased our focus on ensuring new supply agreements have clauses requiring our suppliers to comply with their internal modern slavery policies and/ or the requirements of the Act.

We cannot eliminate the risk that we may be linked to modern slavery via the following causes:

Product risks and industry risks: As has been noted in previous modern slavery statements, 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. We confirm our commitment to improving our supply chain knowledge to enable us to better understand and analyse our supply chain risks.



CHAPTER 5 - 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 to improve our knowledge of the modern slavery risks and the relevant risk mitigation strategies of our most essential suppliers, being our fuel suppliers.

To do this we reviewed the most recent published modern slavery reports of these suppliers.

This not only enabled us to better understand possible modern slavery risks in our supply chain, it also provided us with useful benchmarking and insights to apply to our approach to addressing modern slavery in our supply chain.

2024 Year Conclusions, Findings and Remediation

We:

- 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 confident that we do not directly cause modern slavery;
 - 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;
 - remain committed enhancing our understanding of our supply chain and improving supplier engagement in relation to modern slavery;
 - feel better informed about how modern slavery risks are managed by some of our principal suppliers.
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CHAPTER 6 - 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 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 **this** reporting year, we confirm our commitment to:

- improving our knowledge of our supply chain;
 - increasing our engagement with our suppliers in relation to the risks of modern slavery in our operations and supply chain; and
 - fostering awareness of our modern slavery obligations and responsibilities among those in our organisation who have procurement responsibilities.
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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 **23 December 2024**

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

28/12/24
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