

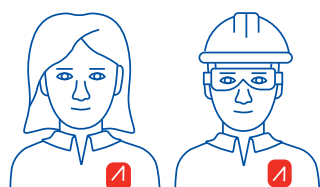


Ampol Limited

Modern Slavery Statement 2020



Powering better journeys, today and tomorrow



Reporting Entities

This is a joint Modern Slavery Statement, made pursuant to the *Modern Slavery Act 2018 (Cth)* (**Act**), for the financial year ended 31 December 2020, covering the following entities that meet the definition of reporting entities in the Act:

- Ampol Limited (ACN 004201307)
- Ampol Australia Petroleum Pty Ltd (ACN 000032128)
- Ampol Retail Pty Ltd (ACN 000175342)
- Ampol Petroleum Distributors Pty Ltd (ACN 005632860)

This Modern Slavery Statement identifies the steps taken in relation to modern slavery by the reporting entities, and the entities wholly-owned or controlled by them (together, for the purposes of this Statement, "Ampol Group").

Throughout this Statement terms such as Ampol, Ampol Australia, and 'we', have the same meaning as Ampol Group, unless the context requires otherwise.

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Eradicating modern slavery is a necessary step towards ensuring we run a sustainable business that has a positive impact on people and communities

Ampol recognises the reach and magnitude of the issue of modern slavery, with more than 40 million people enslaved globally,¹ many exploited in the private sector within multi-layered supply chains, and COVID-19 exacerbating the conditions that enable exploitation. It is imperative that businesses are part of the solution to modern slavery, and Ampol recognises its own responsibility to address these abhorrent practices in its sphere of influence.

Eradicating modern slavery is not just a compliance issue for Ampol – it is a necessary step in ensuring that we are a sustainable business that lives its values, including our fifth company value of *Never stop caring*. It is also what our stakeholders, including our investors, customers, employees and communities in which we operate, expect of us. Ampol is committed to meeting those expectations.

This year, we solidified our commitment to operating our business in a way that upholds human rights by becoming a signatory to the United Nations Global Compact. We undertook deep dives into priority areas identified as higher risk for modern slavery in order to deepen our understanding of the nature of the risk and how it interacts with our operations and supply chains, as well as steps we can take to address these risks. We also strengthened our due diligence approach through enhanced risk assessments, engagements with suppliers and the introduction of contractual clauses.

We worked hard to increase internal awareness and capabilities through modern slavery training for key personnel, and we consulted with key leaders about the risk of modern slavery and how we can address it.

This Modern Slavery Statement sets out the steps we are currently taking to identify and address modern slavery risk; however, we recognise the need to evolve our approach as we move forward. We are committed to continually improving on what we do, including enhancing our identification of modern slavery risk in our operations and supply chains to prevent it from occurring, and thereby improving the circumstances for the individuals at risk of exploitation.

I look forward to continuing this important work.



Matthew Halliday
Managing Director and CEO

A handwritten signature in black ink, appearing to read 'M Halliday', written over a thin blue horizontal line.

1. International Labour Organization and Walk Free Foundation, 2017 Global Estimates of Modern Slavery.

Our values underpin our approach to modern slavery

Ampol's approach to modern slavery is underpinned by the Ampol Values and the Ampol Risk Management Framework (ARMF), is based on the United Nations Guiding Principles on Business and Human Rights and is collaborative in nature.

Ampol Risk Management Framework

Ampol has an enterprise risk management framework, supported by a governance structure, to integrate risk management into the overall culture of the organisation. Risks identified through the ARMF are assessed on a regular basis by management, and material risks are regularly reported to the Board and its committees. These reports include the status and effectiveness of control measures relating to each material risk. Further information on Ampol's approach to risk management is outlined in our Corporate Governance Statement which is available on our website.

Modern slavery risk is recognised by the ARMF as an identified risk source, and the effectiveness of control measures relating to it is assessed regularly. This Statement describes the steps taken by Ampol to assess and address modern slavery risk, which are the control measures used by Ampol to target this risk.

Ampol Values

The Ampol Values underpin everything we do. In particular, the Ampol Value of *Never stop caring* encourages us to always do the right thing and have a positive impact on the communities and economies in which we operate. Ensuring that no modern slavery exists within our operations and supply chains is a critical action that supports this value.



Connect to win

We collaborate as an integrated business to drive growth.



Find new ways

We innovate to deliver positive outcomes.



Own it

We make bold decisions and are accountable for the outcomes.



Make a difference for customers

We are connected to our customers and solve their changing needs.



Never stop caring

We keep safety first and make a positive contribution to those around us.

United Nations Guiding Principles on Business and Human Rights

Drawing on the United Nations Guiding Principles on Business and Human Rights, we recognise our responsibility to avoid causing or contributing to modern slavery through our activities. We also recognise our responsibility to mitigate modern slavery risks that are otherwise linked to us, including through our supply chains. This responsibility requires us to have clear policies, due diligence and remediation processes. Recognising we can't tackle all potential modern slavery risks at once, we have prioritised our mitigation

activities, considering the severity of the risk and our leverage and ability to influence it. We also recognise the need to continually reassess our modern slavery response program, improve on it and show progress each year.

Collaborative approach

Our preference is to engage, collaborate and work with others to address modern slavery and bring about meaningful change. We recognise that collaborating broadens our reach and will allow us to educate, share knowledge and learn from others, ultimately leading to better management of modern slavery risk both by Ampol and business generally.

Ampol Limited is an independent Australian company and the nation's leader in transport fuels

Ampol Limited and the Ampol Group

Ampol Limited is the Australian Securities Exchange (ASX) listed parent company of the Ampol Group, comprising approximately 70 controlled entities. For a full list of controlled entities, see Ampol's 2020 Annual Report (note F1 to the Financial Statements). Ampol Limited is incorporated in Australia with its registered office at 2 Market St, Sydney, NSW 2000.

Subsidiary reporting entities

Ampol Australia Petroleum Pty Ltd is a wholly-owned subsidiary of Ampol Limited and the main operating entity for the Ampol Group.

Ampol Retail Pty Ltd is a wholly-owned subsidiary of Ampol Australia Petroleum Pty Ltd which operates Ampol's Convenience Retail business.

Ampol Petroleum Distributors Pty Ltd is a wholly-owned subsidiary of Ampol Australia Petroleum Pty Ltd which operates Ampol's national depot network and associated truck fleet.

All three subsidiary reporting entities are incorporated in Australia.

Additional investments

Ampol also holds additional investments in a number of associates and joint ventures as set out in Ampol's 2020 Annual Report (note F3.1). This Statement does not cover actions taken by these associates and joint ventures which Ampol does not control.

Simplified structure chart



- Reporting entities (as defined in the Act) making this joint Modern Slavery Statement
- Owned and controlled entities covered by this joint Modern Slavery Statement
- Additional investments not covered by this joint Modern Slavery Statement

Our operations

We supply Australia's largest branded petrol and convenience network as well as refining, importing and marketing fuels and lubricants

We operate a portfolio of highly strategic assets, including privileged infrastructure located across key demand centres, and have the leading branded retail network with more than 1,900 sites nationwide. Our strong infrastructure position is augmented by our supply chain expertise, including a rapidly growing international presence through our trading and shipping operations in Singapore and the United States.

This position and expertise allows us to safely and reliably serve our deep customer base, which is diversified across both wholesale and retail channels. This includes our network of approximately 80,000 B2B customers, a retail network that serves over three million customers each week and our market-leading card offer that maintains 38% market share.

Houston

Houston Trading and Shipping office, which came online in October 2020

New Zealand

Owner of Gull, New Zealand's leading independent fuel brand



Philippines

Strategic partnership designed to augment international growth

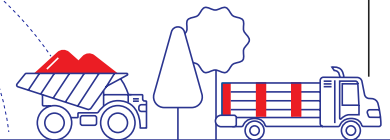
20%

Owned since 2018



100%

Owned since 2017



- Retail network
- Fuels and Infrastructure (Australia)
- Gull network (New Zealand)
- Seaoil network (Philippines)

Singapore

Trading and Shipping office

Ampol's Trading and Shipping business was established in 2013 to source petroleum products from global markets and leverage our privileged infrastructure

Principal activities

Fuels and Infrastructure

Our Fuels and Infrastructure business sources, imports, refines and distributes fuels and lubricants for a diverse customer base.

~80,000

B2B customers

20.1BL

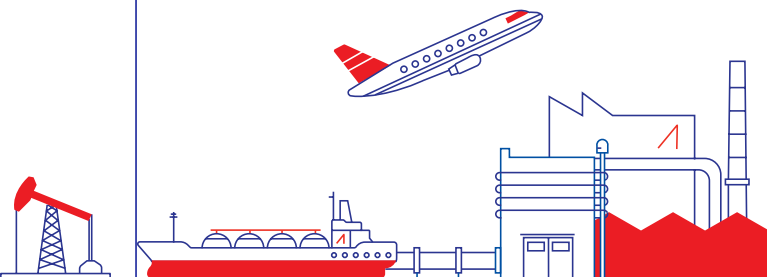
total fuel sales in 2020

74

fuel storage and distribution hubs

36%

increase in international volumes in 2020



Trading and Shipping

Refining

With capability and scale across the transport fuels supply chain, we are the market leader in Australia and an emerging player in the Asian region.

Our capability in product sourcing, peerless infrastructure and network assets, coupled with our deep customer relationships, allows us to run an integrated business and to drive value from international sourcing through to wholesale supply of fuels and lubricants.

In a competitive and evolving market, Fuels and Infrastructure has transitioned successfully over the past five years from a single market supply function to a long-term growth engine that has delivered increased volumes, capabilities and geographies.



For further information, see our Annual Report on our website [here](#).

Convenience Retail

Our Convenience Retail business manages a network of 708 sites to deliver fuel, lubricants and a range of convenience and essential products to more than three million customers every week.

3m

weekly customers

38%

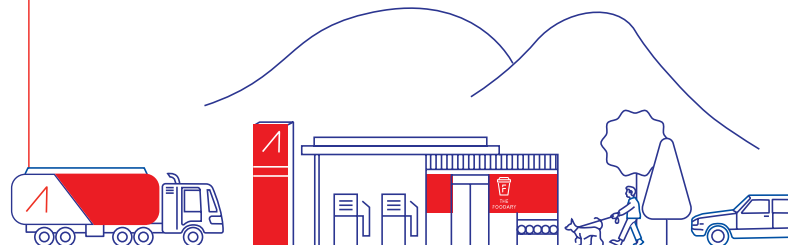
market share maintained by our market-leading fuel card, AmpolCard¹

708

controlled sites

7%

increase in like-for-like shop sales in 2020



Infrastructure and Distribution

Retail

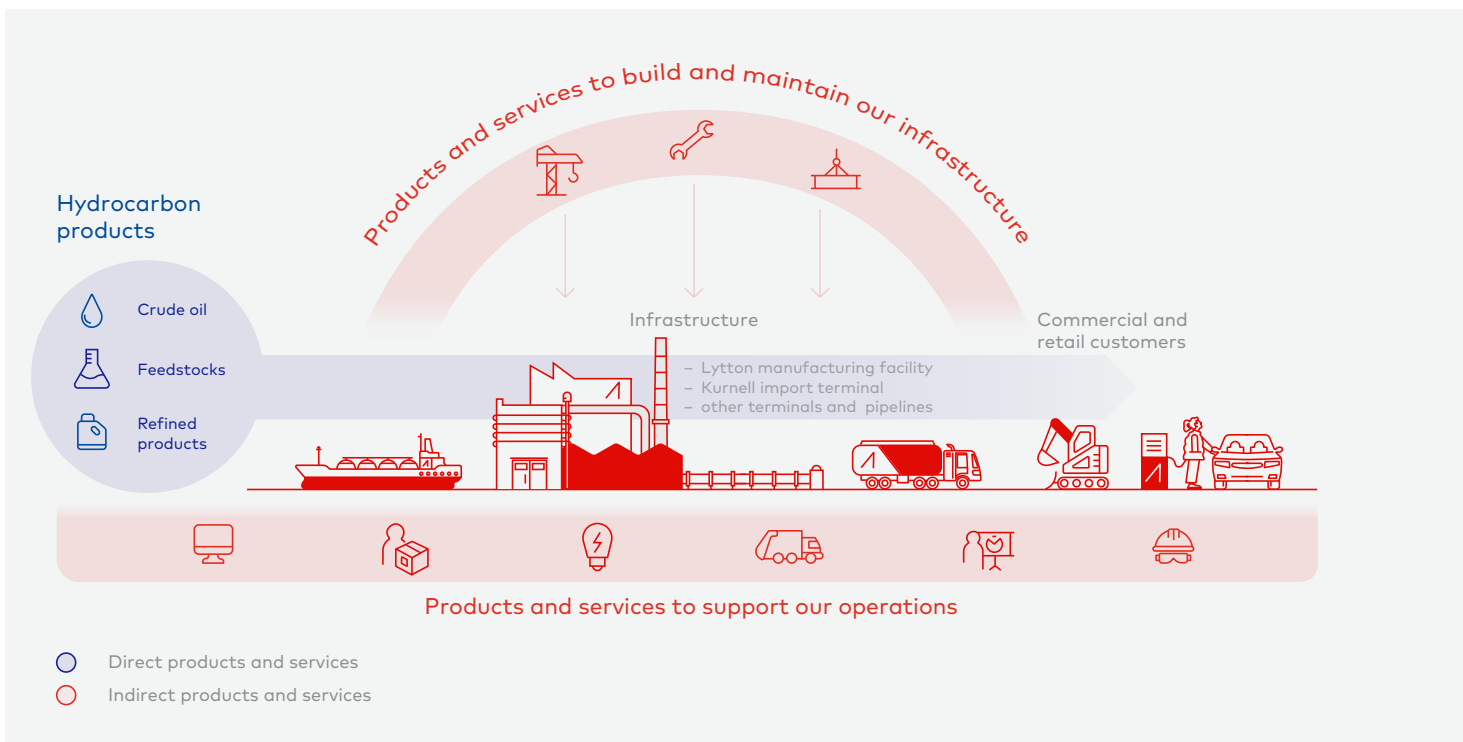
Through new formats, products, technology and services, we are redefining what convenience means for Australians. Our national network of 708 controlled sites delivers customers a premium fuel and card offer through *Amplify* and AmpolCard, with a growing convenience offer that is unparalleled in the Australian market.

Over recent years, we have evolved our convenience offer to meet the changing needs of customers and to capture the growing market opportunity. This includes the introduction of our *Foodary* and Ampol Woolworths Metro formats, and partnerships with Uber Eats as well as quick service restaurant (QSR) partners such as Boost and Guzman Y Gomez.

1. Includes volumes from Ampol's branded retail network.

Ampol's supply chains include direct products and services for sale to customers, and indirect products and services to support our operations

Fuels and Infrastructure supply chain



Ampol's Fuels and Infrastructure goods and services supply chain starts with the sourcing of hydrocarbon products locally and overseas (crude, feedstocks and refined products, including lubricants).

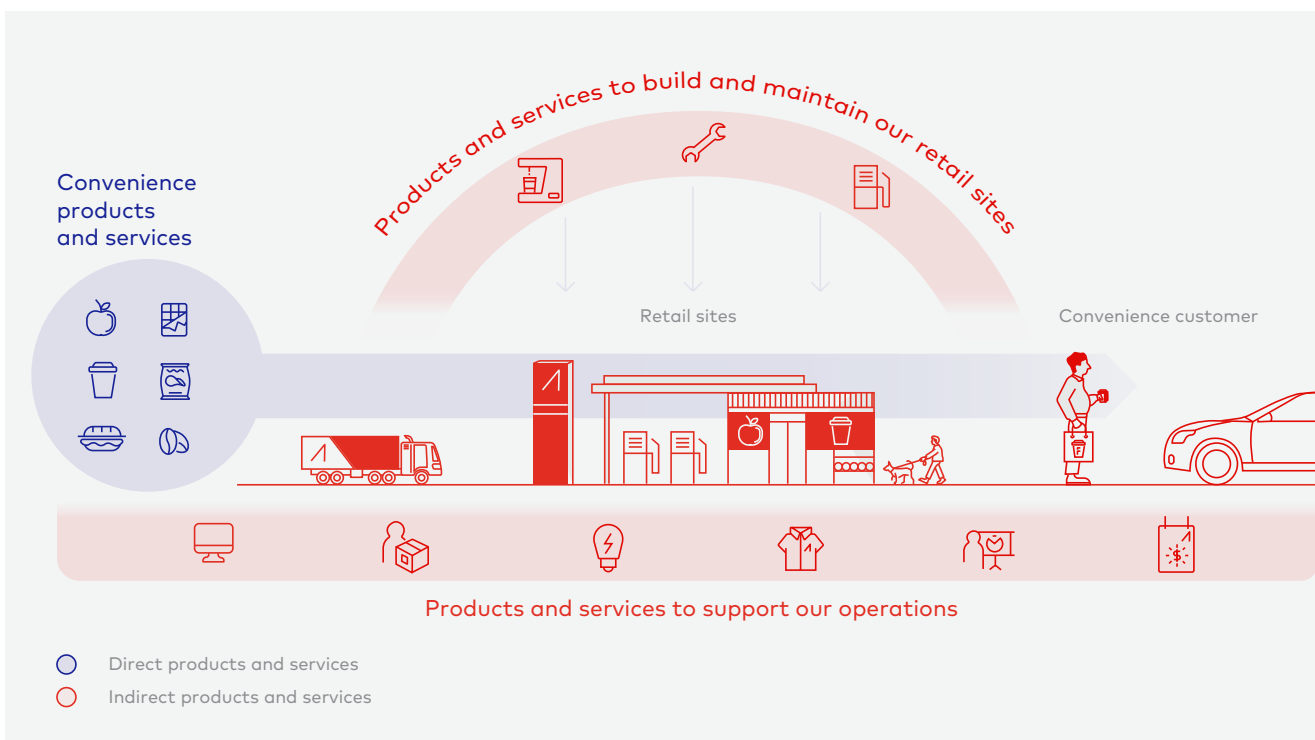
These products are then shipped or distributed:

- directly to Australian and international business customers;
- to the Lytton refinery for processing; or

- to our broad network of assets (including the Kurnell import terminal, other terminals and pipelines) for storage, distribution and sale in our retail business or to our business and commercial customers.

It also includes the procurement of products and services to build and maintain our infrastructure (for example, industrial painting, electrical and mechanical services), and support services and products (for example, logistics, IT infrastructure, PPE, waste management services and professional services).

Convenience Retail supply chain



Ampol's Convenience Retail goods and services supply chain includes the sourcing and distribution of convenience products and services for sale to customers (this includes food ingredients for onsite assembly), the procurement of products and services to build and maintain our retail sites (for example, pump systems and shop fittings) and support service and products (for example, logistics, uniforms, IT infrastructure and marketing).

1. Approximate third-party spend excluding taxation and government charges and intercompany transactions.

Ampol Group supply chains

4,000+
Suppliers

88%
Australian suppliers

12%
International suppliers

\$15.05+b
AUD Spend¹

We recognise the increased risk of exploitation created by COVID-19 for already vulnerable workers

Ensuring safe and reliable supply

Over three million retail customers a week and around 80,000 business customers across Australia depend on Ampol's essential products and services, whether it be fuel, lubricants or convenience products. Ampol's priority during the COVID-19 pandemic has been to ensure the health and safety of our employees, customers and partners, and continuing to reliably supply our products and services.

Impact on vulnerable workers

We recognise the increased risk of potential exploitation created by COVID-19 for already vulnerable workers, due to interrupted business activities, supply chain pressures, border restrictions, and job losses and insecurity. Throughout the pandemic, Ampol's approach with suppliers has been centred around open communication, in order to understand how COVID-19 and any resulting changes to procurement patterns have impacted them. This approach aimed to navigate the disruptions in a way that achieved satisfactory outcomes for both parties, while also being mindful of the impact these changes would have on workers within the supply chain.

Ampol distributed surveys to critical suppliers as part of our crisis management process for COVID-19 and established a supplier solvency monitoring program, with the aim of proactively identifying early signs of financial stress within our supply base. This program provided the opportunity to discuss financial risks with our suppliers and, where appropriate, reduce payment times to improve suppliers' cash flow.

Impact on workplan

The disruption caused by COVID-19 meant that Ampol had to pause or stop certain projects and activities. We also recognised that many of our counterparties were focused on the emerging crisis and sustaining core business activities. Activities put on hold during 2020 included elements of our Supplier Code of Conduct due diligence program and elements of our workplace compliance program for our associated retail sites, which are not company controlled. While some elements such as the Supplier Code of Conduct supplier questionnaires and site audits were paused, we continued to utilise other elements of the programs which were not impacted such as contractual updates, training, and grievance mechanisms.



Case study

COVID-19 tenure checks

The impact of COVID-19 and the associated border restrictions has been acutely felt in shipping. Ampol is heavily reliant on shipping and seafarers to move its product. With the onset of COVID-19, and the restrictions on international travel, crew changeover has become challenging as countries restrict entry and international travel is disrupted. Since April 2020, the Australian Maritime Safety Authority (AMSA) has published several guidance notices relating to maximum continuous periods that a seafarer can serve on board a vessel. These guidelines were aimed at ensuring seafarer health and wellbeing.

In response to AMSA's guidelines, Ampol added an additional due diligence step to its vessel-vetting process, obtaining a crew list that indicates how long the crew have been on board the ship. For any crew members approaching 11 months of continuous service, Ampol requires further documentation to identify how their repatriation will be managed. Where such measures are unsatisfactory, and there is no indication of willingness to remedy this, Ampol will not approve the use of the vessel.

We utilise established risk indicators and indices to identify potential modern slavery risks in our operations and supply chains

In 2019, a detailed modern slavery risk assessment of our operations and supply chains was conducted, with the objective of increasing transparency and creating a better understanding of modern slavery risk.

The assessment utilised established risk indicators and indices (such as the United States Department of Labor's 2018 List of Goods Produced by Child Labor or Forced Labor and the Global Slavery Index 2018) to identify where there is potential modern slavery risk in our operations and supply chains.



This risk assessment uncovered several potential risks of modern slavery practices in Ampol's operations and supply chain, arising through:

	<p>Procurement of high-risk products for resale or to support business operations</p>	<p>Examples include coffee purchased for resale at Ampol retail stores; and electronics used by Ampol employees</p>
	<p>Procurement of high-risk services</p>	<p>For example, cleaning services at Ampol sites</p>
	<p>Interactions with high-risk industries</p>	<p>Examples include shipping, with Ampol regularly chartering vessels to move its products; and agriculture, with Ampol selling biofuels, which include agriculture feedstock, as well as fruit and vegetables at its retail stores</p>
	<p>Reliance on vulnerable workers</p>	<p>For example, foreign visa holders in Ampol's non-company controlled retail sites</p>
	<p>Use of high-risk business models</p>	<p>Examples include the use of guard services procured through third-party labour-hire arrangements at Ampol sites; and the use of base-skilled construction labourers, also procured through third-party labour hire arrangements in significant construction projects</p>
	<p>Procurement from high-risk countries</p>	<p>For example, the purchase of uniforms manufactured in China and Vietnam, which are products classified as 'at risk of modern slavery' in the Global Slavery Index</p>

Having uncovered an initial list of potential risk areas, Ampol identified specific areas for each business division to prioritise for further due diligence by way of a deep dive. The prioritisation was based on the nature and severity of the potential risk, and Ampol's ability to influence the risk in those areas. See page 13 (Risk area deep dives) for further detail.

Assessing and addressing modern slavery risk

Our approach to assessing and addressing modern slavery is supported by a robust governance structure

Governance

We believe adopting a high standard of corporate governance is essential to ensuring modern slavery risk is appropriately managed at Ampol. The following governance structure supports the management of modern slavery risk at Ampol.

Ampol Board

Responsible for corporate governance policies and risk management, including those relevant to modern slavery. Approves relevant policies for publication on the Ampol website and Ampol's Modern Slavery Statement.

Board Safety and Sustainability Committee

Oversees the implementation of Ampol's modern slavery response program.

Ampol Executive Leadership Team (ALT)

Monitors progress of the modern slavery response program.

Legal and governance

Works across the business to coordinate and support delivery of Ampol's modern slavery response program.



Further information on Ampol's corporate governance framework, practices and policies are outlined in our Corporate Governance Statement which is available [here](#).





Our policies and expectations

Ampol Values and Code of Conduct

Ampol's approach to modern slavery risk is underpinned by the Ampol Values. The Ampol Values set the foundation for the Ampol Code of Conduct, which sets out Ampol's expectation of its people and includes a firm commitment to supporting the fundamental principles of human rights as expressed in the International Bill of Human Rights, the International Labour Organization Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights. The Ampol Code of Conduct confirms Ampol does not tolerate any form of slavery or child labour, including forced labour, and acknowledges that in order to respect human rights, Ampol needs to manage any adverse human rights impacts which we may cause, contribute to or be linked to.



The Ampol Code of Conduct applies across the Ampol Group and can be accessed [here](#).

Ampol Supplier Code of Conduct

Our respect for human rights provides the basis for our expectations of ourselves and for our counterparties. These expectations are set out in the Ampol Supplier Code of Conduct and include Ampol's expectations around labour and human rights. This includes the expectations that counterparties will:

- ensure all work is freely chosen without the use of modern slavery, including forced or compulsory labour;
- ensure workers are of legal age, preventing any form of child labour;
- pay their workers lawful wages; and
- provide fair working conditions for employees.

The principles outlined in Ampol's Supplier Code of Conduct apply to all third-party suppliers, contractors, trading and business partners and service providers (**Suppliers**) and their employees who transact with or provide any goods or services to Ampol.



The Ampol Supplier Code of Conduct can be accessed [here](#).

Ampol Human Rights Policy

Ampol has enshrined its commitment to conducting its business in a manner that respects human rights in its Human Rights Policy. The Ampol Human Rights Policy calls out focus areas where respect for human rights is most critical to the way we operate including:

- considering human rights and setting minimum expectations as part of sourcing and purchasing decisions; and
- providing a safe, secure and inclusive work environment free from discrimination, bullying and harassment, together with fair pay and labour conditions.



The Ampol Human Rights Policy applies to the Ampol Group and can be accessed [here](#).



Supplier engagement

Ampol Supplier Code of Conduct compliance

The Ampol Supplier Code of Conduct sets out the minimum expectations of counterparties across the key areas of labour and human rights, diversity and inclusion, health and safety, environment and sustainability, and ethical procurement. In 2019, Ampol commenced proactive engagement with suppliers to assess their compliance with the expectations set out in the Supplier Code of Conduct through a supplier questionnaire administered via Ampol's supplier risk management platform – Informed 365 (**Supplier Code of Conduct supplier questionnaire**). The Supplier Code of Conduct supplier questionnaire allows Ampol to identify gaps in a counterparty's ability to comply with the expectations set out in the Ampol Supplier Code of Conduct and address these gaps.

Our expectations are communicated to suppliers through making the Supplier Code of Conduct available publicly, the Supplier Code of Conduct supplier questionnaire, contractual agreements or when registering for tenders.



Future action: we will work to further embed Supplier Code of Conduct compliance measures into business-as-usual processes.

Contractual clauses and tender questions

To strengthen Ampol's management of modern slavery risk present through counterparty relationships, we have updated key precedents to include requirements around our Supplier Code of Conduct and added clauses that specifically relate to modern slavery. This includes requirements to:

- comply with modern slavery laws and not engage in modern slavery;
- maintain relevant policies and procedures;
- take reasonable steps to reduce the risk of modern slavery in the supply chain; and
- assist Ampol with its due diligence procedures that are aimed at reducing modern slavery risk in its supply chains.



Future action: we will continue to update additional precedents and include clauses where appropriate in bespoke agreements.

In 2020, Ampol implemented a new sourcing platform which streamlines Ampol's tender process for material tenders. A mandatory question relating to how a supplier manages modern slavery risk has been embedded in the tender platform to ensure that engagement with counterparties on modern slavery risk commences early on.

Deep dives undertaken in

15

areas of Ampol's supply chain

30

detailed modern slavery questionnaires completed by targeted suppliers

Risk area deep dives

As set out on page 09 (Risks of modern slavery practices), one outcome of the initial risk assessment was the identification of several potential modern slavery risk areas which were prioritised for deep dives.

The deep dives were undertaken using a combination of some or all of the following:

- detailed discussions with internal subject matter experts;
- detailed modern slavery questionnaires, administered via Ampol's supplier risk management platform, Informed 365 (**modern slavery questionnaire**), which was sent to a selection of suppliers; and
- meetings with suppliers to engage specifically on the issue of modern slavery.

The deep dives and detailed modern slavery questionnaires have provided Ampol with better visibility on the nature of the risk in the various parts of Ampol's operations and supply chains, and what Ampol and its suppliers are doing to manage these risks. Insights from the deep dives are used to inform our approach to modern slavery risk in these areas and have allowed Ampol to identify additional mitigation steps. These additional mitigations steps include activities such as targeted training and the use of modern slavery contractual clauses.



Case study

Ampol uniforms

Ampol's risk assessment identified uniforms to be a potential risk area given the nature of the product and the location of manufacture, which is often offshore and in locations considered to be higher risk on the 2018 Global Slavery Index. As part of the deep dive into this area, Ampol requested that one incumbent and two potential suppliers from this category respond to its detailed modern slavery questionnaire, following up with direct discussions with one of the suppliers. Through the deep dive, it became apparent to Ampol that social auditing of factories is standard practice in this industry, as is the ability to identify where garments and inputs are being manufactured.

These learnings were integrated into a request for proposal (**RFP**), issued in 2020, for the production of retail uniforms as part of the Ampol rebranding project. Within the RFP, all tenderers were required to:

- acknowledge and agree to Ampol's Supplier Code of Conduct;
- explain to Ampol what policies and processes they have in place to identify and address modern slavery risk; and
- identify the locations they will be sourcing the uniforms from.

Ampol will also require visibility over manufacturing locations for uniforms in any contracts coming out of the tender and work with the vendor to ensure social audits are executed for these manufacturing locations.



Future action: Ampol will identify additional priority risk areas for deep dives in 2021.

Specific risk mitigation for targeted higher risk areas

Entry-level workers at non-company controlled sites

While not directly part of Ampol's operations, Ampol recognises the potential risk of exploitation of base-skilled workers employed as shop assistants throughout its associated retail sites, which are not company controlled. This workforce includes vulnerable workers, such as foreign students with limited working rights, and migrant workers, who may have limited understanding of their rights or how to enforce them. Ampol does not have control over the working conditions of employees within the extended network. However, Ampol has a workplace compliance program (**Reasonable Steps Program**) whereby Ampol takes steps to help ensure fair and legal treatment of workers employed throughout its associated retail sites.

Franchise sites

Within Ampol's franchise network, the Reasonable Steps Program includes:

- contractual obligations to comply with workplace laws;
- workplace compliance audits;

- a phone advice line where franchisees can call and get free advice on first level support for human-resources related matters on a confidential basis; and
- access to a dedicated hotline for employees wishing to raise wage or visa non-compliance concerns confidentially.

Since the program commenced, approximately 420 sites have been audited, and appropriate remediation action taken where issues were identified.

Since 2018, Ampol has been transitioning franchise sites to company operations, which has resulted in a significant reduction in the risk of exploitation within this part of the network, with Ampol now controlling working conditions. At the end of 2020, only 12 franchise sites remained, all of which have been audited as part of the program at least once.



Future action: in 2021, all franchised sites remaining in the network past April 2021 will be audited for workplace compliance.

Associated sites (other than franchise sites)

Ampol's Reasonable Steps Program, as it applies to associated retail sites in Australia other than franchise sites, includes:

- contractual obligations to comply with workplace laws;
- workplace law compliance validation checks;
- access to education and practical assistance relating to compliance with workplace obligations; and
- a dedicated hotline for employees wishing to raise wage or visa non-compliance concerns confidentially.

Since 2018, when this program commenced, 40 associated retail site operators have undergone a validation check and appropriate remediation action taken where issues were identified.



Future action: 15 associated sites scheduled for validation checks in 2021.

Gull

Within the Gull retail network, Gull's Head Franchisor undertakes regular compliance audits (including workplace elements) on operators where there are risk indicators of non-compliance, and remediation action is taken where issues are identified. In addition, the risk of non-compliance has been reduced with seven of 17 sites moving to unmanned operations in 2020 (with a further two transitioning early in 2021). Transitioning franchise sites to an unmanned format eliminates risk of site-worker exploitation.

New contractual arrangements with Gull's Head Franchisor and their franchisees will be rolled out in the second half of 2021, allowing Gull the right to complete its own direct audit of franchisees.



Future action: in addition to the existing audit program, Gull will audit a sample franchise site directly on an annual basis.



Seafarer welfare

In recognition of seafarers' particular vulnerability to exploitation, Ampol utilises a vessel-vetting process to ensure counterparties moving its product by ship provide fair and safe working conditions for their crew.

World Check

Using World Check, a third-party due diligence screening tool, all vessel owners are screened for instances of adverse media or litigation (including those relating to modern slavery) prior to onboarding, and on a continuous basis after being approved.

MLC Certification

All vessels are checked for a current Maritime Labour Convention certificate, covering issues set out in the Maritime Labour Convention 2006, including protection at work, living conditions, employment, health, social security and related issues.

COVID-19 tenure checks

For shipping vessels, additional checks were introduced following the onset of COVID-19 for all vessels to assess crew time on board. See case study on page 08 (COVID-19 tenure checks).

OCIMF Inspection Reports

All vessels are checked for a current Oil Companies International Marine Forum (OCIMF) vessel inspection report, which focuses on safe operations and safety measures, including where these relate to the crew.

PSC inspections

Port State Control (PSC) reports (which check compliance with the Maritime Labour Convention 2006) from the previous 12 months are reviewed for all vessels in order to identify issues and avoid using vessels detained by the PSC due to unsatisfactory crew conditions.

Financial standing

A significant risk for ship crew is posed in the event a vessel owner goes bankrupt and abandons the ship and its crew. Ampol conducts credit checks on all vessel owners to mitigate this risk.



Future action: as part of the deep dive into shipping, Ampol identified an additional check which it will incorporate into its vessel-vetting process going forward: the ITF ship lookup. Administered by the International Transport Workers' Federation (ITF), the lookup relates to conditions on board vessels, including where an ITF inspection uncovered problems, such as low wages.

Grievance mechanisms

Grievance mechanisms provide a direct channel of communication between individuals adversely impacted, and Ampol. They provide a way for Ampol to monitor whether its activities are causing, contributing, or directly linked to worker exploitation, and to address such adverse impacts if they are identified. Ampol is committed to ensuring anyone coming forward with concerns based on reasonable grounds is treated fairly.

Ampol's Grievance Resolution Policy

Ampol's Grievance Resolution Policy provides the mechanism for employees to raise workplace grievances, including issues relating to their working conditions, and have these issues addressed in line with the Ampol Values and Code of Conduct.

Whistleblower Policy

Ampol has a Whistleblower Policy, which establishes a framework for Ampol to comply with obligations regarding whistleblowers, including legal protections provided by law for whistleblowers. The Whistleblower Policy is designed to protect and encourage our employees, and those external to Ampol with close knowledge of our operations (including employees of suppliers), to report misconduct, including behaviour that is unethical, corrupt or illegal, without fear of retaliation.

Ampol Hotline

Ampol's grievance mechanisms are supported by an independently run confidential Hotline, which is open to Ampol employees, as well as individuals outside Ampol who have knowledge of misconduct relating to Ampol. The Hotline allows reports to be made anonymously, and for such matters to be managed and documented securely. Reports made to the Hotline trigger a process within Ampol to assess the report and take further steps, including investigation and remediation if appropriate in the circumstances. Reports made to the Ampol Hotline are monitored and reported to the Chief Governance and Risk Officer and the General Manager, Group Risk and Audit, on a monthly basis and the Board and Human Resources Committee on a six-monthly basis.





As at the end of 2020

~98%

of Ampol employees had completed Code of Conduct training within the previous two years

~65 employees

attended modern slavery training in 2020, encompassing nine different business functions

Training sessions were used as an opportunity for dialogue to better understand modern slavery risk and management

Training

Ampol employees are trained on Ampol's Code of Conduct obligations and expectations every two years, using a mandatory online training module. They are also required to acknowledge and agree to the Ampol Code of Conduct when onboarding. Breaches of the Ampol Code of Conduct can be reported through human resources, a person's manager or the Ampol Hotline, and are monitored and reported to the Board and Human Resources Committee on a six-monthly basis.

In addition, groups of employees who require a more detailed understanding of Ampol's modern slavery risk were identified for modern slavery training in 2020. This included employees within human resources, procurement and business functions responsible for areas with heightened potential risk.

Training was conducted via video conference and included topics such as:

- modern slavery and its prevalence in Australia and globally;
- why Ampol needs to appropriately manage modern slavery risk;
- how Ampol manages modern slavery risk;
- what individuals at Ampol can do to manage this risk; and
- how to recognise potential indicators of modern slavery.

Training sessions were used as an opportunity for dialogue to better understand modern slavery risk and management within specific business functions, thereby serving to both upskill employees and deepen Ampol's understanding of the issue.



Future action: we will review the Ampol Code of Conduct training to identify opportunities to strengthen employee awareness of modern slavery risk and grievance mechanisms. We will also identify additional employee groups for targeted modern slavery training.

In implementing Ampol's modern slavery response program, Ampol has consulted with key stakeholders across the business

Ampol assesses the effectiveness of the actions it takes in a number of ways

- **Governance:** Feedback and assessment from the Board, Safety and Sustainability Committee and ALT on the implementation and progress of Ampol's modern slavery response program.
- **ARMF:** The status and effectiveness of control measures relating to modern slavery risk are assessed via Ampol's ARMF risk assessment process.
- **Policies:** Periodic scheduled reviews of relevant policies, including the Ampol Human Rights Policy.
- **Supplier Code of Conduct compliance:** Monitoring the number of suppliers who acknowledge Ampol's Supplier Code of Conduct and the number of suppliers who complete the Supplier Code of Conduct supplier questionnaire.
- **Contract clauses and tender questions:** Monitoring the number of precedents updated to include relevant modern slavery clauses, and the number of tenders including modern slavery questions and responses.
- **Training:** Monitoring the number of individuals trained.
- **Grievance mechanisms:** Monitoring Ampol's grievance mechanisms to identify trends and issues raised.
- **External engagement:** External engagement with forums, peers and experts in the field to understand best practice and emerging information relating to modern slavery.

As we mature our modern slavery response program, we will look to improve our measurements of effectiveness.

Consultation with owned or controlled entities, including reporting entities

In implementing Ampol's modern slavery response program, Ampol has consulted with key stakeholders from relevant parts of Ampol's business. This included consultation with functions which operate across the Ampol Group (including legal, procurement and human resources) as well as targeted operational functions.

Modern slavery consultation sessions were also conducted with a number of Ampol subsidiary Boards, and similar sessions convened with subsidiary directors and other key leaders for each of Ampol's Fuels and Infrastructure and Convenience Retail businesses.

Directors and key leaders from the three additional joint reporting entities (Ampol Australia Petroleum Pty Ltd, Ampol Retail Pty Ltd and Ampol Petroleum Distributors Pty Ltd) were captured in this consultation process.

In addition, prior to approval by the Ampol Limited Board, this statement was reviewed by:

- key members of the ALT responsible for the overall management of the Ampol Group and implementation of its strategy; and
- the directors of Ampol Australia Petroleum Pty Ltd, Ampol Retail Pty Ltd and Ampol Petroleum Distributors Pty Ltd.

Consultation with investments

This statement covers actions being taken by entities owned or controlled by Ampol. Investments in associates and joint ventures which are not controlled by Ampol are approached in a similar manner as suppliers. The risk in relation to these is assessed and prioritised in the context of other Ampol group modern slavery risk categories. Further engagement with these entities on modern slavery risk will be undertaken based on the risk profile, priority ranking and nature of the relationship with Ampol of the particular investment.



Meaningful change and an effective solution require collaboration

We recognise that modern slavery is a complex problem with a web of multiple and interconnected root causes and influences. Businesses alone cannot eradicate the problem. Meaningful change and an effective solution require collaboration with governments, the private sector and civil society, as well as a focus on addressing the problems that contribute to modern slavery, such as poverty, lack of equal education opportunities and access to fair work opportunities.

Commitments and collaboration

In October 2020, we further strengthened our commitment to operating our business in a manner that respects human rights by becoming a participant of the United Nations Global Compact and a signatory to the Ten Principles of the United Nations Global Compact on human rights, labour, environment and anti-corruption, which include the elimination of all forms of forced and compulsory labour and the effective abolition of child labour.

This allows us to participate in the Global Compact Network Australia's Modern Slavery Community of Practice meetings. These meetings are aimed at discussing the most pressing challenges and obstacles facing Australian business with respect to managing and communicating modern slavery risks and discussing good practice in responding to these challenges.

Ampol's approach to modern slavery eradication continues to be collaborative, including reaching out to others to share knowledge.

Addressing the root causes of modern slavery

The Ampol Foundation, established in 2019, is the vehicle through which Ampol delivers its corporate social responsibility activities. The focus of the Foundation is to ensure our activities have proven social impact, make a meaningful difference and align with our company purpose of *Powering better journeys, today and tomorrow*. A major focus of the Foundation in 2020 has been to champion education and employment opportunities for Australia's youth.

Reducing inequality and ensuring fair employment opportunities and quality education for all Australians will contribute to creating the underlying social infrastructure needed to eradicate modern slavery. Further information on the work of the Ampol Foundation is set out in Ampol's 2020 Sustainability Report.



Future action: Ampol will seek to identify additional opportunities to collaborate with others and participate in modern slavery forums.

Approval process

This statement was reviewed and approved by the Board of Directors of Ampol Limited on 15 April 2021. The Ampol Board of Directors will review and update this statement on an annual basis.



Matthew Halliday
Managing Director and CEO