



COMPANY POLICY

MODERN SLAVERY STATEMENT

Introduction

This Modern Slavery Statement covers the activities of Geraldton Fuel Company Pty Ltd trading as Refuel Australia ("Refuel", "the reporting entity") for the period 1 January 2024 to 31 December 2024.

Purpose

Refuel operates in the petroleum retailing industry and is subject to the Modern Slavery Act 2018 (Cth) ('Act') that commenced operation on 1 January 2019. The head office is located in Geraldton, Western Australia, with the majority of business operations occurring north and east of Perth

The Act requires reporting entities subject to the Act, to produce an annual modern slavery statement. It is the policy of Refuel to show we are committed to operating our business lawfully and ethically and in only working with suppliers that are aligned to our company's values. The reporting entity has developed this statement according to the guidelines set out by the Attorney General's Department.

The Reporting Entity

The reporting entity is part owned by Ampol (an Australia wide fuel retailer) and part locally owned.

The reporting entity operates as a retailer of fuel products in Western Australia and the Northern Territory through both bulk haulage and local sales. The primary supply chain of the reporting entity involves the acquisition of bulk fuels from major terminals, being Perth, Geraldton, Adelaide and Port Hedland. Fuel is purchased from petroleum producers/importers and distributed direct to customers or to storage locations for later on-sale.

The other major supply chain revolves around the acquisition of goods and services to facilitate the movement of bulk petroleum. Primarily this requires the use/purchase of fuel moving equipment, fuel dispensing equipment, goods/services related to the maintenance of these assets and incidental goods/services necessary to operate a business. These goods and services are primarily purchased through domestic suppliers and wholesalers, both within and outside of Western Australia.

Risks Identification

We acknowledge that the risk of modern slavery exists within our primary supply chain as the production of the majority of petroleum-based goods occurs overseas and Refuel does not have oversight of these production or distribution processes. Furthermore, the production of petroleum-based products also occurs in countries that have specific modern slavery risks given their various economic and political climates.

There are also potential modern slavery risks in the supply chains of goods that we acquire to facilitate in the transportation of our primary products; in particular the materials used in the manufacturing of



machinery, equipment and supplies related to these assets. While these items are procured domestically the reporting entity does not have visibility on the materials used or the country of origin of these materials/products.

Assessment of Actions Taken

Refuel Finance & Administration and Human Resources teams have various policies in place that support our day-to-day operations to ensure all staff and suppliers meet Refuel core values. These policies assist the reporting entity, where possible, to work with suppliers known to be of good standing, or known to have their own guidelines relating to the identification of modern slavery risks. Irrespective of annual business turnover, we expect our key suppliers to operate in accordance with Australia's applicable modern slavery laws including those prohibiting human slavery and slavery like practices, human trafficking and child labour.

We value and observe all laws regarding corporate social responsibility, environmental and workplace safety protection, staff inclusion and diversity. However the reporting entity acknowledges that its current methods to review the effectiveness of its responses to modern slavery risks do not go far enough in providing insight into whether or not actions taken were effective. The review of actions taken will continue to evolve as the reporting entity becomes more aware of the slavery risks that could permeate existing and future supply chains, and continues to develop policies and guidelines around this area. The reporting entity believes that further assessment of corporate governance, supplier relationships and supply chain management will allow for more effective feedback on the actions taken to address these risks.


Refuel only controls one other entity, which utilises the same supply chains and administrative centre. All transactions are subject to the same processes as Refuel. Therefore no additional consultation was deemed necessary with respect to modern slavery risks, as there are no additional supply chains present.

Process

Particular steps we will be undertaken, in partnership with our peak governing body ACAPMA, which will include:

1. Assessing the potential modern slavery risks in our operations and supply chains with emphasis on high risk geographical locations and business transactions;
2. Developing and reviewing company policies on modern slavery in operations and supply chains;
3. Developing training for staff in modern slavery requirements;
4. Preparing to conduct due diligence on local and global supply chains;
5. Reviewing supplier contracts to ensure they contain terms that are consistent with the Act; and
6. Taking steps to address any potential modern slavery risks identified.

This statement was approved by the Board of Refuel Australia on 30 April 2024.



Ian Burrows
Managing Director