



MODERN SLAVERY
STATEMENT
2024





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 2024, 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)
- Ampol Property Trust (ABN 41 830 779 954)
- Ampol Energy (Wholesale Trading) Pty Ltd (ACN 660 016 062)

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” or “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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MESSAGE FROM THE MANAGING DIRECTOR AND CEO

2024 wasn't without its challenges for Ampol, but we remained steadfast in our ongoing commitment to managing modern slavery risks within our business and sphere of influence.

Ampol's fourth Modern Slavery Statement addresses the incremental yet important developments we have made as part of our role in taking steps to assess and address modern slavery risks.

Geopolitical tensions and ongoing conflicts sat atop the global agenda once again in 2024, impacting international human rights standards and leaving millions of people susceptible to the pervasive risks of modern slavery.

In December 2024, the Australian Government agreed to the majority of recommendations arising from the McMillan review into the first three years of the operation of the *Modern Slavery Act 2018* (Cth). This ongoing evolution of the legislative framework demonstrates the vital role business is required to play in responding to modern slavery across global supply chains and operations.

Freedom and control of one's life should be a universal right enjoyed by all. Sadly, this isn't always the case. The safety of our people and the communities in which we operate remain at the fore of Ampol's day-to-day operations, and we remain diligent in our approach to identifying and mitigating modern slavery risks.

An enhanced third-party platform implemented in 2024 will assist Ampol in identifying modern slavery risks within the supply chain. The Fair Supply platform has provided Ampol with an independent view of modern slavery risk along the entire supply chain, rather than just through the direct supplier. Additionally, the Fair Supply platform can issue questionnaires to suppliers to determine a rating to be used for modern slavery risk assessment and mitigation.

We continued to conduct our supplier site visits in 2024, among them an important trip to China in the first quarter to assess the work practices of potential manufacturers for our AmpCharge at-home electric vehicle chargers ahead of contracts being awarded. Our team were exposed to workers performing the assembly and manufacturing work which enabled direct observation and evaluation for modern slavery-related purposes. Combined with our standard modern slavery risk assessment which sought evidence on safety, workforce and training policies, we were able to make an informed decision through direct engagement at the workplace level.

The addition of Z Energy in New Zealand to our existing businesses in Australia and Singapore results in Ampol being one of the largest Trans-Tasman integrated fuel suppliers. This means that our commitment to the prevention of modern slavery now extends to New Zealand, despite New Zealand not presently having relevant legislation in place.

Given the similar risks attached to both operations, integrating Z Energy into the Ampol Group Code of Conduct and aligning our approach to modern slavery was a priority in 2024. An extension of Z Energy's whistleblower service to Z retailers, where the business does not directly operate retail sites, has furthermore improved and aligned grievance mechanisms across the Group.

I am proud to present Ampol's 2024 Modern Slavery Statement.

We all have a role to play in eliminating all forms of modern slavery and I look forward to Ampol continuing this important work in 2025.



Matthew Halliday
Managing Director and CEO

We all have
a role to play
in eliminating
all forms of
modern slavery.



OUR PROGRESS IN 2024

In Ampol's 2023 Modern Slavery Statement, we made commitments on behalf of our joint reporting entities to address the risks of modern slavery during 2024. These commitments are found in the form of "Future Actions" and include commitments to continue certain initiatives, or to create new initiatives for delivery in 2024.

Our progress against these prior year commitments includes:

 Completed  Completed and Developing

-  Implementation of a Human Rights Standard.
-  Implementation of an enhanced third-party platform, *Fair Supply*, to identify third-party risk within the supply chain.
-  Integration of Z Energy into the Ampol Group Code of Conduct.
-  Ampol will continue to require a minimum of 80% of suppliers (measured by spend) to complete the Supplier Code of Conduct Questionnaire.
-  Ampol will continue to transition existing suppliers upon renewal of contract to the current modern slavery terms.
-  Ampol to continue the practice of site visits to suppliers.
-  The modern slavery risk assessment processes continue to apply as a mandatory step for the onboarding of new suppliers.
-  Ampol engaged a qualified third-party to deliver quarterly information sessions to associated site operators regarding workplace rights and entitlements.
-  During 2024, Ampol ensured that at least 10% of Australian dealer sites and distributors underwent workplace compliance audits.
-  Ampol continued to require its modern slavery learning module to be completed by all identified leaders or decision-makers who are in a position to make a difference consistent with Ampol's modern slavery objectives.
-  Ampol continued to seek additional opportunities to collaborate with others and participate in modern slavery forums. This has included the AiGroup Modern Slavery Reference Group and the Fair Supply Sustainability Professionals Association.

AMPOL GROUP
SUPPLY CHAINS AS AT
31 DECEMBER 2024

SUPPLIERS¹
2,987

AUSTRALIAN
SUPPLIERS

85%

Representing
\$6.47b AUD spend²

INTERNATIONAL
SUPPLIERS

15%

AUD SPEND
\$10.83b

In addition to the above,
Z Energy total procurement spend
(excluding imported fuels) was
NZD \$313.8m from 740 suppliers.

1. Suppliers represent third-party providers that Ampol traded with in 2024 across Fuels and Infrastructure and Convenience Retail supply chains.
2. Approximate third-party spend excluding taxation and government charges and intercompany transactions.

OUR APPROACH TO MODERN SLAVERY RISK

Our approach to modern slavery is guided by our risk management framework and is underpinned by our values.

Ampol's approach to risk management is also outlined in our Corporate Governance Statement, which is available on our [website](#).

Ampol's approach to modern slavery is underpinned by the Ampol Values and the Ampol Risk Management Framework (ARMF) and is based on the United Nations Guiding Principles on Business and Human Rights. It is collaborative in nature, integrating the efforts of our people, suppliers and industry partners to protect human rights and prevent any form of exploitation.

Ampol recognises that effectively managing modern slavery risk is a critical component of our broader, proactive method for identifying and addressing risks and opportunities. By leveraging our ISO 31000:2018-aligned framework, alongside the ASX Corporate Governance Principles and Recommendations, we embed modern slavery mitigation into our day-to-day business activities. This strengthens ethical conduct, helps safeguard human rights and ensures our organisation remains resilient.

Ampol's approach to risk management, including how we address modern slavery risk, is further outlined in our Corporate Governance Statement.

Modern slavery risk is formally recognised within the ARMF as a risk source under the Regulatory and Compliance material risk category. We routinely evaluate the effectiveness of our control measures to ensure they remain robust and responsive to changing conditions. Our current modern slavery control measures include:

- the Ampol Modern Slavery Statement
- modern slavery training
- the Ampol Supplier Code of Conduct
- the Ampol Modern Slavery Risk Assessment and Mitigation Standard
- the Dealer Code of Conduct

Risk Management Governance

- **Board Approved Policy** – The Ampol Risk Management Policy, approved by the Board, clarifies roles and responsibilities for managing all key organisational risks, including the risk of modern slavery.
- **Board Oversight** – The Board of Directors, along with its Committees (Audit, Safety and Sustainability, and People and Culture), receives regular updates on material risks. These updates include modern slavery risks and any associated remediation actions or compliance issues.
- **Executive Accountability** – Each material risk has a designated owner from the Ampol Leadership Team (ALT). The ALT coordinates annual reviews of each risk and reports key findings to the Board. This structure ensures our response to modern slavery is supported and overseen at the highest levels of the Group.

THREE LINES MODEL

Ampol employs the Three Lines Model (3LM) to clarify and coordinate responsibilities for managing risk, including modern slavery risk:

- **First Line** – Operational managers address risks in their daily activities. They are trained to identify and escalate concerns related to modern slavery, ensuring prompt and appropriate mitigation.
- **Second Line** – Functions such as treasury, risk management, and compliance provide oversight and maintain Ampol's frameworks and policies. They verify adherence to modern slavery standards and track the effectiveness of relevant controls.
- **Third Line** – Internal audit provides independent assurance on the effectiveness of Ampol's control processes, confirming that modern slavery risk management remains sound and comprehensive.

Top-Down, Bottom-Up Approach

Ampol uses both a top-down and bottom-up approach to identify and manage risks:

- **Top-Down** – Senior leadership sets the strategic agenda and risk priorities, including our commitment to human rights and modern slavery prevention. This ensures that considerations of risk are integrated at an enterprise level and factored into business strategies.
- **Bottom-Up** – Teams and individuals at every level of the organisation identify risks within their specific operations, including with respect to supply chain decisions and any signs or risk factors indicative of modern slavery. By escalating these concerns, Ampol forms a detailed, holistic view of our risk profile and can respond swiftly and decisively.



OUR APPROACH TO MODERN SLAVERY RISK CONTINUED



Ampol Risk Management Framework (ARMF)

Our Enterprise Risk Management Framework (the ARMF) is designed to systematically identify, analyse, treat, and monitor all business and strategic risks. It is grounded in the principles of ISO 31000:2018 and aligns with the ASX Corporate Governance Principles and Recommendations. Within this framework, modern slavery risk is clearly identified under the Regulatory and Compliance category, and we regularly assess the effectiveness of relevant control measures. The ARMF includes:

- **Establishing Context** – Internal and external factors are considered, including political, economic, social, technological, environmental, legal, and ethical aspects that could influence modern slavery risk.
- **Risk Identification** – We proactively seek out any threats to human rights within our operations and supply chains, documenting them for further review and analysis.
- **Risk Analysis** – Each risk is examined for its likelihood and potential impact, including modern slavery scenarios that may involve labour exploitation, human trafficking, or other forms of coercion.
- **Risk Evaluation** – Our findings are measured against Ampol's risk tolerance, ensuring modern slavery concerns receive immediate attention when they surpass defined thresholds.
- **Risk Treatment** – Where needed, we implement mitigation strategies, such as strengthening contractual obligations, improving due diligence processes, and collaborating with suppliers on corrective actions.
- **Monitoring** – We continuously assess the performance and robustness of our controls, refining them whenever necessary to ensure they remain effective.

- **Review** – The Ampol Board conducts an annual review of the overall risk management framework. This includes evaluating our modern slavery approach to confirm it meets Ampol's high standards of compliance and integrity.
- **Consultation and Communication** – We engage with our employees, suppliers, industry peers, and other stakeholders at every stage of the risk management process. This open dialogue fosters shared understanding and helps drive continuous improvement in modern slavery risk management.

Through this comprehensive framework, Ampol maintains a strong focus on human rights and ethical conduct. Our collaborative and transparent approach, supported by consistent Board-level oversight, ensures we remain vigilant against modern slavery risks and prepared to act swiftly on any concerns.

For further detail on our wider approach to environmental, social, and governance matters, refer to our 2024 Sustainability Report and Climate Report 2024.

Enhanced Compliance Program

Ampol's Enhanced Compliance Program (ECP) sits within our broader approach to governance, risk and compliance, connecting three critical layers: the Ampol Risk Management Framework (ARMF), the Ampol Compliance Management Framework (ACMF), and Core Topics that capture specific areas of legal or regulatory obligation. Modern slavery is integrated as a Core Topic to ensure clear accountability, targeted oversight and continuous alignment with relevant legislation.

The ARMF is Ampol's overarching framework for identifying, assessing and managing material risks. One of these material risks is Regulatory and Compliance, where key obligations must be systematically tracked and met to safeguard Ampol's brand, finances and reputation. Within this risk category, the ACMF guides how Ampol recognises, prioritises and fulfils its compliance obligations. Modern slavery is characterised as a material compliance obligation, reflecting the seriousness of potential legal and ethical consequences if left unmanaged. Under the ACMF, the ECP formalises our approach to handling these obligations and ensures that compliance activities are embedded across all levels of the Group.

At the core of the ACMF, the ECP provides consistent principles, processes, and governance for key compliance topics, collectively called "Core Topics." Examples of these Core Topics include modern slavery, human rights, environmental regulations and health and safety standards. Each Core Topic is assigned a dedicated owner who is responsible for documenting obligations, monitoring compliance and escalating any areas of concern.

By highlighting modern slavery as one of the ECP's Core Topics, Ampol ensures that forced labour, human trafficking and other ethical risks receive concerted attention in day-to-day operations. This approach encompasses:

- Tracking legislation and regulatory changes to modern slavery laws through automated feeds
- Conducting compliance gap assessments to verify the adequacy of Ampol's preventive measures
- Providing the Ampol Board and executive leadership with transparent oversight of modern slavery controls under the ARMF

OUR APPROACH TO MODERN SLAVERY RISK CONTINUED

Integration of LexisNexis

LexisNexis was selected as our partner to continuously monitor legislative amendments on Ampol's behalf and provide notifications for core topics, including those related to modern slavery, feeding these updates directly into Ampol's Governance, Risk and Compliance platform E360. This integration ensures that Ampol's obligations register—one of the core artefacts of the ECP—always reflects the latest legal requirements. Each updated obligation is assigned to the relevant Core Topic owner, who is responsible for confirming Ampol's compliance or initiating corrective actions if needed.

Obligations Registers and Compliance Gap Assessment

All core obligations, including modern slavery requirements, are captured and maintained in E360. During 2024, Ampol conducted a compliance gap assessment across the modern slavery topic to evaluate how effectively these obligations were being met. The review covered policies, training modules, supply chain due diligence, and other internal controls specific to modern slavery. The assessment confirmed no deficiencies in our compliance with modern slavery legislation and highlighted opportunities for further efficiency, such as refining supplier screening processes.

Governance, Monitoring and Continuous Improvement

The ECP features clear governance pathways, with each Core Topic owner contributing to a central compliance forum that ensures alignment with the ACMF and ARMF. Material issues—such as potential modern slavery breaches—are escalated to the Ampol Leadership Team (ALT) and, if needed, to the Board. This model not only drives transparency but also makes it easier to monitor control effectiveness and adapt quickly to emerging risks.

Through the ECP, Ampol ensures that regulatory obligations for modern slavery are thoroughly addressed, from high-level policy-making down to day-to-day practices in our supply chain. By embedding modern slavery as a Core Topic within the ACMF and monitoring key controls under the ARMF, Ampol maintains a proactive, well-coordinated compliance strategy that reinforces our commitment to ethical conduct and protects the interests of our people, partners, and communities.

Ampol Group Modern Slavery Risk Assessment and Mitigation Standard

Ampol's Modern Slavery Risk Assessment and Mitigation Standard provides a framework for assessing and addressing modern slavery risks when purchasing goods and services and is routinely used by Ampol employees and contractors to evaluate supply chain risk.

The Standard was implemented in November 2022 and the next periodic review is due in November 2025. The document will be reviewed and updated earlier where there is feedback from the Ampol modern slavery working group or there is regulatory change informed by the compliance program.

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 cannot tackle all potential modern slavery risks at once, we have continued to prioritise our mitigation activities, considering the severity of the risk and our ability to influence outcomes. Our changing business activity helps to reprioritise our response.



OUR APPROACH TO MODERN SLAVERY RISK CONTINUED

Collaborative approach

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

Our modern slavery working group is now a global team encompassing participants from Australia, Singapore and more recently, New Zealand. The working group enables participants to share information internally and apply our approach uniformly across our different business units and when working with external stakeholders.

Collaborative Engagement with Suppliers

Ampol markets a diverse group of products across a varied customer group. Ampol's customers range from everyday consumers purchasing fuel, food and groceries within its Convenience Retail network through to large corporate customers purchasing bulk fuels and lubricants.

Ampol sources a wide variety of product spanning fresh fruits & vegetables, transport fuels, fast food, batteries, industrial chemicals, personal hygiene products and fish bait. As a consequence, Ampol partners with an array of suppliers – locally and internationally. Some of Ampol's suppliers are small local businesses and others are large multinational corporations.

Ampol requires that all suppliers agree to Ampol's modern slavery terms and agree to support the principles within the Ampol Supplier Code of Conduct. Where suppliers are unable or unwilling to agree to the Ampol Supplier Code of Conduct, Ampol will require that the supplier has an equivalent code of conduct or otherwise provide evidence that demonstrates equivalent policies or procedures to mitigate modern slavery risks.

Ampol's modern slavery terms, amongst other things, require that suppliers will not engage in modern slavery and will promptly report and remediate instances of modern slavery discovered in their businesses or supply chains. Ampol recognises that a one size fits all approach to all suppliers is not always practical. Ampol works collaboratively with suppliers to agree to amended or alternative terms that meet Ampol's modern slavery objective yet also maintains practical measures having regard to the nature of the supply.

FUTURE ACTION

In 2025, Ampol will conduct the 2-yearly review of the Ampol Group Modern Slavery Risk Assessment and Mitigation Standard.

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.

OUR STRUCTURE

Ampol Limited is an independent Australian company and a regional leader in transport fuels.

Ampol Limited and the Ampol Group

Ampol Limited is listed on the Australian Securities Exchange (ASX) as the parent company of the Ampol Group, comprising approximately 80 controlled entities. For a full list of controlled entities, see Ampol’s 2024 Annual Report.*

Ampol Limited is incorporated in Australia with its registered office at 29–33 Bourke Road, Alexandria, NSW 2015.

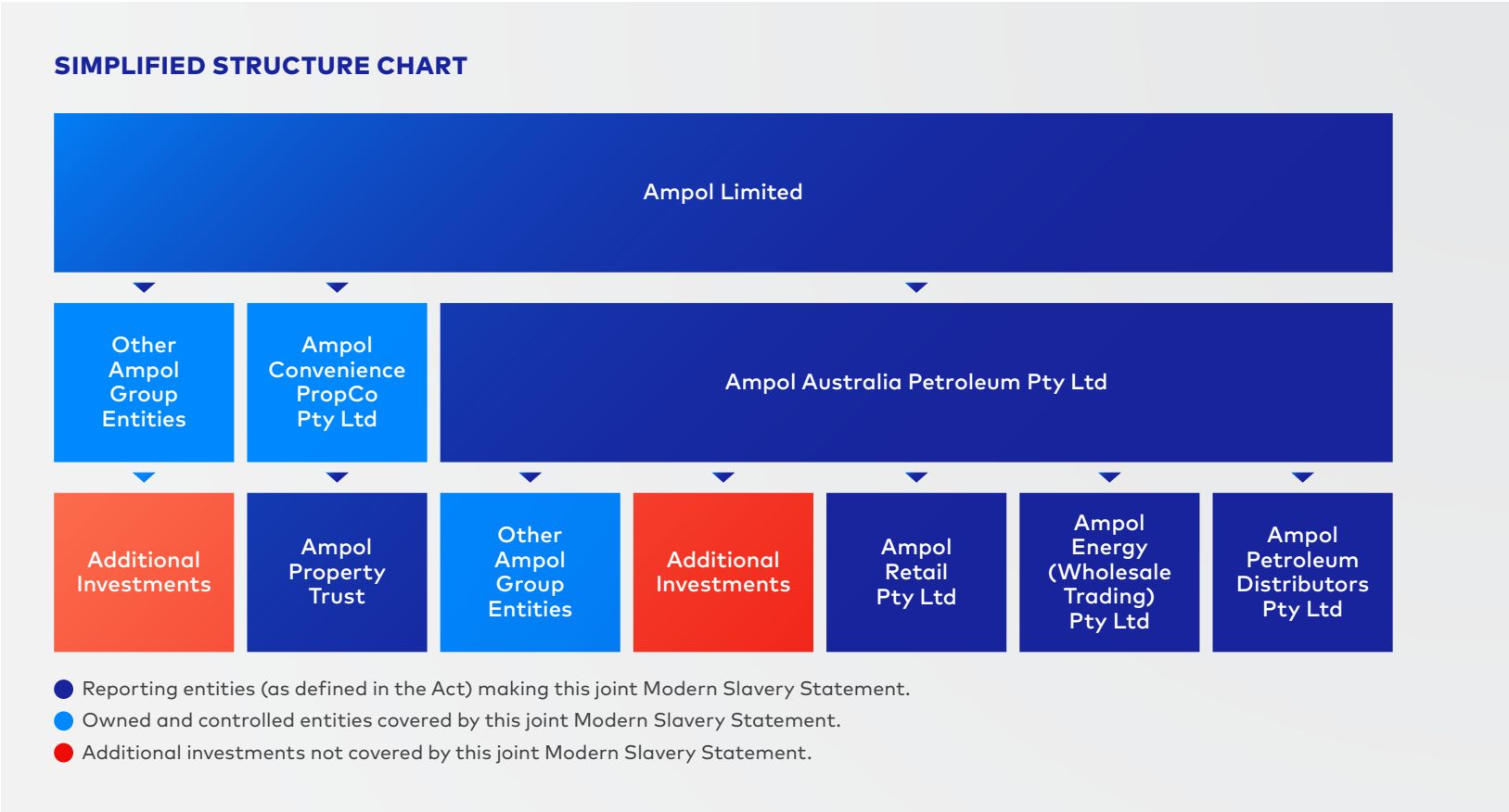
Subsidiary reporting entities

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 that operates Ampol’s Convenience Retail business.

Ampol Petroleum Distributors Pty Ltd is a wholly owned subsidiary of Ampol Australia Petroleum Pty Ltd that operates Ampol’s national depot network and associated truck fleet within the Fuels & Infrastructure Business Unit.

Ampol Property Trust (ABN 41 830 779 954) is 51% owned by Ampol Convenience PropCo Pty Ltd with the remaining 49% owned by third parties that do not form part of the Ampol Group. Ampol Convenience PropCo Pty Ltd is wholly owned by Ampol Limited.



The purpose of the trust is to hold the freehold title of 204 Ampol Convenience Retail sites. As an administrative entity, the trust does not have independent operations, employees or supply chains.**

Ampol Energy (Wholesale Trading) Pty Ltd (ACN 660 016 062) is a wholly owned subsidiary of Ampol Australia Petroleum Pty Ltd which operates Ampol’s wholesale electricity business.

All five reporting entities are incorporated or otherwise formed in Australia.

Additional investments

During 2024, Ampol also held additional investments in a number of associates and joint ventures as set out at Note F3.1 of Ampol’s 2024 Annual Report. This statement does not cover actions taken by these associates and joint ventures that Ampol does not control.

* Note F1 to the Financial Statements.

** For the purposes of the reporting criteria under the Modern Slavery Act 2018 (Cth), see Ampol Retail Pty Ltd content which should be taken to apply for the purposes of the trust.



OUR OPERATIONS

Powered by connection

An independent Australian company, Ampol is the leader in transport energy across Australia and New Zealand.

Ampol's market position is unmatched in the Australian and New Zealand transport fuels market. Our competitive strengths lay with our strategic assets, supply chain expertise, deep customer base and iconic brands.

Our ability to service our broad customer base is supported by our robust supply chain and strategic infrastructure positions. In Australia, this includes 14 terminals, 6 major pipelines, 50 wet depots, more than 1,700 Ampol-branded sites (including 628 company-controlled retail sites) and one refinery located in Lytton, Queensland.

In New Zealand, there are 9 terminals and 502 sites (includes Z Energy and Caltex branded sites).

The supply chain is supported by more than 9,600 people across Australia, New Zealand, Singapore and the United States of America (USA).

Keeping customers moving with the right fuel in the right place.

Over the past decade, we have been growing our international presence, culminating in the acquisition of Z Energy in 2022. In 2024, international revenues contributed to almost half of total group revenues.*

Our ability to service a broad range of customers ensures we have an important role to play in supporting our customers through the ongoing energy transition. Our integrated business generates strong cash flows and provides a strong foundation to invest in the energy transition in a disciplined manner.

* See Note B3.4 of the 2024 Annual Report.

** In March 2025, Ampol announced that its wholly owned subsidiary Z Energy had entered into an agreement to sell its entire shareholding in Channel Infrastructure.



We operate a portfolio of strategic assets across key demand centres and leading branded retail networks throughout Australia and New Zealand.

1

AUSTRALIA

Serving retail and business customers for over 100 years.

2

NEW ZEALAND

Owner of Z Energy, one of New Zealand's largest transport energy companies. Ampol also owns 12.6% of Channel Infrastructure in New Zealand via its ownership of Z Energy.**

3

SINGAPORE

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

4

PHILIPPINES

Strategic partnership with Seaoil. (20% owned)

5

UNITED STATES OF AMERICA

Houston-based Trading and Shipping office, which commenced trading in October 2020.

OUR OPERATIONS CONTINUED

Principal activities

FUELS AND INFRASTRUCTURE



BUSINESS AND SME CUSTOMERS

~110,000

across Australia and New Zealand

2024 TOTAL SALES VOLUME*

27.3BL

Our Fuels and Infrastructure business sources, imports, refines and distributes crude, fuels and lubricants to a diverse commercial and wholesale customer base.

With capability and scale across the transport energy supply chain, we are one of the leading operators in Australia and New Zealand, and a challenger in the Asia and United States regions.

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.

Whilst we had resilient operations in the first half of 2024, the second half saw both a decline in refiner margins and reliability issues at the Lytton refinery which included a maintenance pit stop in the fourth quarter. Notwithstanding those operational challenges, our safety performance remained a priority.

* Across the entire Ampol business.

CONVENIENCE RETAIL



WEEKLY RETAIL CUSTOMERS

~4 million

across Australia and New Zealand

COMPANY-CONTROLLED RETAIL SITES

628

SITES IN BRANDED PETROL AND CONVENIENCE NETWORK

>1,700

Largest in Australia

Our Convenience Retail business delivers fuel, lubricants and a range of products and services to power better journeys for customers.

Through new formats, products, technology and services, we are redefining what convenience means for Australians. Our national network of 628 company-controlled sites delivers customers a premium fuel and card offer through Amplify Premium Fuels and AmpolCard, with a growing convenience offer that is disrupting the Australian market.

2024 saw Ampol continue the success of its Quick Service Restaurant (QSR) strategy through both the Boost Juice and Hungry Jack's brands. Ampol remains the largest Boost Juice franchisee with 46 sites.

OUR OPERATIONS CONTINUED

Principal activities

ENERGY SOLUTIONS

Our Energy Solutions business plays a key role in supporting customers through their energy mobility transition journeys.

The business has focussed on technologies which are closest to commercialisation which include the continued rollout of the AmpCharge electric vehicle (EV) charging network at Ampol retail sites and the rollout of EV charging infrastructure at third-party sites and home charging equipment.

Supporting EV uptake

Ampol's aim is to build Australia's leading e-mobility brand, leveraging our position as the country's largest branded fuel and retail convenience network.

2024 saw the launch of the Ampol home charging product. This enables customers to purchase their EV charger direct from Ampol and have it installed at their residential premises.

EV CHARGING NETWORK AS AT 31 DECEMBER 2024:

144

AmpCharge charging bays in Australia across 59 sites

85

bays under construction or awaiting grid connection

2024 also saw the first of the AmpCharge at-destination chargers at Mirvac's East Village and South Everleigh Shopping Centres in Sydney and ISPT's Melbourne-based Barkly Square.

In 2024, Z Energy added a further 67 charging bays. As at 31 December 2024, Z Energy had 171 charging bays across 53 sites.

Renewable Fuels

The Brisbane Renewable Fuels project involves exploring the possible use of agricultural, animal and other waste feedstocks to produce renewable fuels* for domestic and export use at the Lytton Refinery.

In 2024, Ampol signed a Memorandum of Understanding with GrainCorp and IFM Investors to move Ampol's Brisbane Renewable Fuels project from feasibility study to the pre-FEED phase (front-end engineering and design). The program remains in early planning stages and no supply chains (for feedstocks) have been established.

Wholesale Electricity

The energy wholesale trading team manages the energy markets price risk of the Energy Solutions business. It does this primarily through participating in energy financial markets, transacting in both over the counter (OTC) products with wholesale client counterparties as well as exchange traded derivatives.

* Renewable Fuels means liquid hydrocarbons made from non-petroleum based renewable feedstocks such as purpose grown biomass, or from waste material such as tallow or used cooking oil.

Z ENERGY

WEEKLY CUSTOMERS

~1 million
across all sites

ELECTRIC VEHICLE CHARGING BAYS

171
across 53 sites as at 31 December 2024

TERMINALS OPERATED BY Z ENERGY

9

40%
OF NEW ZEALAND'S BULK FUEL TERMINAL STORAGE BY VOLUME

Z Energy is one of New Zealand's largest transport energy companies, including the Z and Caltex branded retail networks, and supplies and distributes fuel to commercial and wholesale customers.

By the end of 2023, Z shifted its contracted fuel import requirements into the Ampol supply function, realising further supply chain efficiencies and economies of scale, and in support of New Zealand's fuel security and resilience.

Z Energy believes that a core component of the energy transition is a scaled domestic public EV charging network that enables accessible, convenient, and reliable charging solutions to meet the needs of drivers now and into the future. Z continues to evolve our service station network to meet changing customer demand including leveraging several existing Z-branded sites to add EV charging capabilities.

The New Zealand operations consist of 9 terminals and 502 sites (includes Z Energy and Caltex branded sites).



OUR TEAM*

Employees

9,127

LOCATED

SINGAPORE

132

AUSTRALIA

8,466

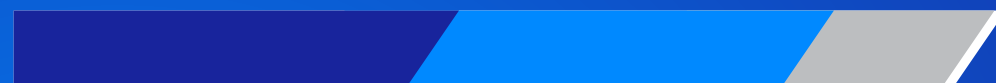
NEW ZEALAND

522

UNITED STATES

7

EMPLOYMENT STATUS



● Casual

4,097

● Full Time

3,449

● Part Time

1,477

● Fixed Term Contract

104

EMPLOYEE ENGAGEMENT

79%

EMPLOYEE NET PROMOTER SCORE

38

FEMALE REPRESENTATION

42%

REPRESENTATION AT
SENIOR LEADERSHIP LEVEL

42%

REPRESENTATION
OVERALL

50%

REPRESENTATION ON
THE AMPOL LEADERSHIP TEAM

38%

REPRESENTATION ON
AMPOL LTD BOARD

0.9% like-for-like gender pay gap in favour of males, and 11.7% overall gender pay gap in favour of males across all of our locations**

* The information on this page is current as at 31 December 2024.

** The Workplace Gender Equality Agency (WGEA) recently published employer gender pay gaps by mean, and median. These figures apply exclusively to workforces based in Australia. The WGEA data can be obtained from wgea.gov.au

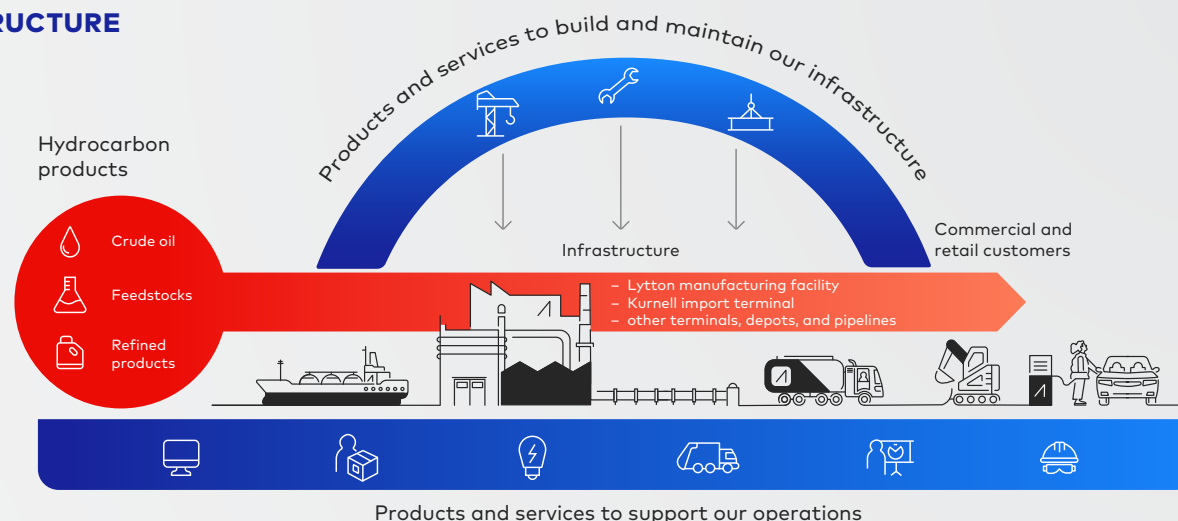
OUR SUPPLY CHAINS

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

- Direct products and services
- Indirect products and services



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

In Australia, Ampol operates 14 terminals, 6 major pipelines and 50 wet depots.

Ampol's Fuels and Infrastructure supply chains also include 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).

The Ampol Fuels and Infrastructure supply chains apply to all reporting entities covered by this statement.

OUR SUPPLY CHAINS CONTINUED

CONVENIENCE RETAIL

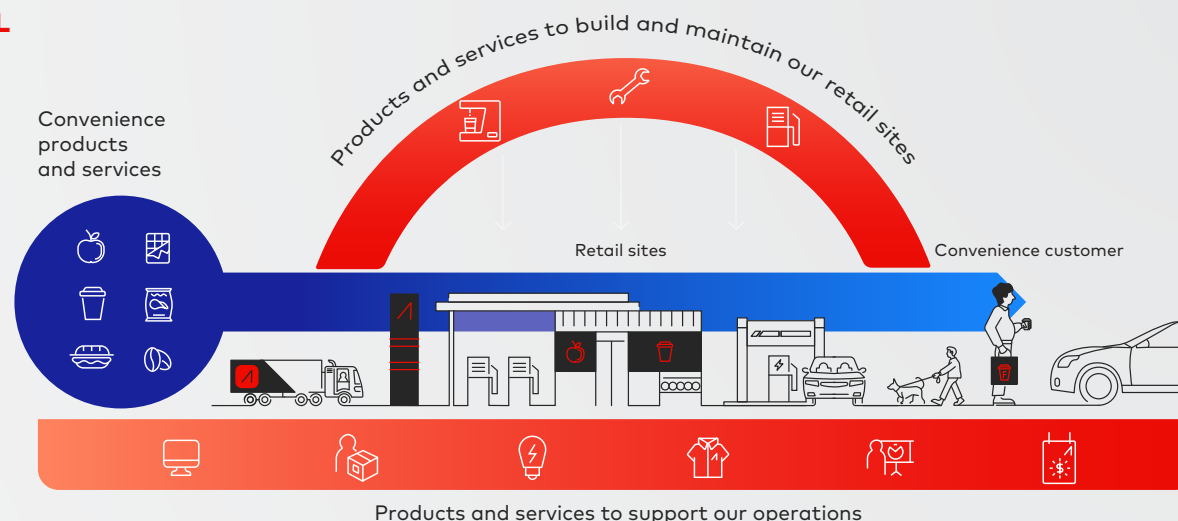
Ampol's Convenience Retail goods and services supply chain includes the sourcing and distribution of convenience products and services for sale to customers (this includes food ingredients for onsite assembly), the procurement of products and services to build and maintain our retail sites (for example,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

As at 31 December 2024, Convenience Retail had approximately 142 ongoing trade suppliers (excluding fuel products).

- All 142 suppliers have completed the Ampol pre-questionnaire (prior to becoming a supplier) and a separate risk assessment as part of the supplier onboarding process.
 - 16 suppliers were characterised as medium risk primarily due to the nature of the industry. For example, farming, cocoa and fishing.
 - The remaining 126 suppliers were rated as low risk.
- Of the 16 medium risk suppliers, 9 maintain modern slavery or similar code of conduct policies and statements and reporting practices due to their size.
- In addition to the 142 ongoing trade suppliers, Ampol sources fresh produce (including fruit, vegetables, meat and bread) from a variety of local suppliers and markets. The majority of these suppliers have been categorised as high risk due to the variety of suppliers and the nature of the industries involved.
- Ampol conducted 13 site visits to ongoing trade suppliers in 2024.

CONVENIENCE RETAIL SUPPLY CHAIN

- Direct products and services
- Indirect products and services



Retail: Quick Service Restaurants & Hot Kitchens

Ampol's growing Quick Service Restaurant (QSR) business includes both Hungry Jack's and Boost Juice offerings. The QSR business primarily sources its food ingredients from agreed suppliers with the franchisor. Both Hungry Jack's and Boost Juice separately provide modern slavery statements which are accessible on the register and describe their supply chains and associated risks. Ampol has relied on the modern slavery statements of its franchisor partners for the preparation of this statement.

In the case of Hungry Jack's, Ampol sources its dry goods and frozen products from the Hungry Jack's distributor under a franchise agreement.

Subject to the franchise agreement, Ampol sources its bread products from Australian-based bakeries and dairy products from Australian-based dairy businesses, which are in turn sourced from farmers and processed locally. Other branded foods (syrops, water, coffee beans and café syrups) are sourced from a variety of local and international brands that operate in Australia.

In the case of Ampol's Boost Juice offering, Ampol orders frozen ingredients, dry goods and packaging from Boost Juice approved suppliers. Fresh fruit and vegetables in the Boost Juice category are ordered through a single wholesaler on the East Coast & SA, and another on the West Coast, selected by Ampol who source their supply from local (Australian) growers and farmers.

For its QSR business, Ampol has identified the agricultural supply chain as a modern slavery risk, particularly where the wholesaler subcontracts the work to smaller local businesses.

Hot Kitchens

Ampol operates various restaurants and hot food takeaway offerings from within various fuel retail sites (Hot Kitchens). During 2024, Ampol moved 37 of its Hot Kitchen sites from using local suppliers to a single supplier for fresh produce, which in turn relies on various local suppliers. This change resulted in a change of the modern slavery supply chain risk and a greater capacity for Ampol to review the practices of a single supplier.

The Convenience Retail supply chains described in this statement applies to Ampol Retail Pty Ltd and the Ampol Property Trust reporting entities. This information also applies to the Ampol QSR Pty Ltd controlled entity.



OUR SUPPLY CHAINS CONTINUED

ENERGY SOLUTIONS

During 2024, Ampol has continued to build upon its e-mobility strategy, which includes the rollout of EV chargers across its retail network and into third-party sites.

This forms part of Ampol's broader strategy to build a national charging network that will assist in minimising range anxiety for EV owners and support EV uptake.

As at December 2024, Ampol had a total network of 315 EV charging bays across Australia and New Zealand.

- 144 AmpCharge charging bays in Australia across 59 sites.
- 171 charging bays in New Zealand across 53 sites.

The supply chain to build the infrastructure includes:

- Sourcing appropriate e-mobility charging equipment and associated site infrastructure.
- The installation/build of the sites which requires specialist labour and a potential for third-party labour (i.e. the use of contractors).
- Connection to the electricity grid.

The AmpCharge at-destination chargers are sourced from two global manufacturers based in Europe. The chargers are manufactured in Italy, the Netherlands and Hungary.

The procurement process for these chargers included a selection of suppliers with product of higher reliability and who had a mature supply chain for modern slavery purposes. Through the *Fair Supply* platform, Ampol has reviewed the modern slavery risk of these suppliers which resulted in the risk rating being low. Ampol has determined the risk to be consistent with Ampol's modern slavery expectations.

The residential AmpCharge at-home chargers are sourced from a manufacturer in China. Ampol procures the chargers direct from the manufacturer. See page 18 which provides a case study on the modern slavery risk assessment that Ampol applied to the selection of this supplier.



OUR SUPPLY CHAINS CONTINUED



Z ENERGY

Z Energy's supply chains can be simplified into three distinct parts relating to the supply and distribution of:

- Refined fuel and the products and services that support the delivery of refined fuel and related products. This includes lubricants to customers via our retail network of service stations and truck stops, and refined fuel to wholesale customers/competitors through Terminal Gate Pricing (TGP) via our bulk fuel terminals.
- Products for our retail sites and products and services that support our corporate operations.

Z Energy supplies just over half of New Zealand's total liquid transport energy requirements. Z Energy does not explore or drill for oil.

Z Energy is supplied by Ampol Trading and Shipping and sources 100 percent of its refined fuel from global refineries located predominantly in Asia, including Singapore, Japan and Korea. Z Energy currently has a cargo of fuel arriving into the country approximately every five-and-a-half days.

SUPPLY AND DISTRIBUTION

Refined product is imported by tanker either to Channel Infrastructure or directly to ports around the country. Channel Infrastructure operates the Terminal to Auckland Pipeline (TAP), a 170 kilometre underground multiproduct pipeline which transfers industry refined product to Auckland.

Z Energy's operations consist of nine bulk fuel storage terminals across New Zealand, with total storage representing just over 40 percent of the country's tankage. Product is distributed in smaller amounts from bulk fuel terminals by road tankers and pipelines to retail service stations and truck stops. We also sell fuel to wholesale customers/competitors from the bulk fuel terminals we operate.

CUSTOMERS

Z Energy provides product such as aviation fuel to airlines, marine fuel oil to the shipping and fishing industries and diesel for trucks and tractors.

Z Energy has the largest truckstop network in the country with 123 sites. In 2024, Z Energy also provided fuel to customers through its network of 502 Z Energy and Caltex branded sites.



OUR SUPPLY CHAINS CONTINUED

CASE STUDY CHARGERS & SITE VISITS – CHINA

By reason of the higher risk of modern slavery that the electronics manufacturing industry presents, Ampol adopted a higher standard to its modern slavery risk assessment pertaining to its at-home charging supplier selection.

The procurement and supplier selection of the at-home chargers involved the following process which at each step contained a mitigation of modern slavery risk:

- 1 Initial Shortlisting phase
- 2 Interviews
- 3 Shortlist and RFP phase
- 4 Site Visit
- 5 Modern Slavery Risk Assessment
- 6 Ongoing Due Diligence

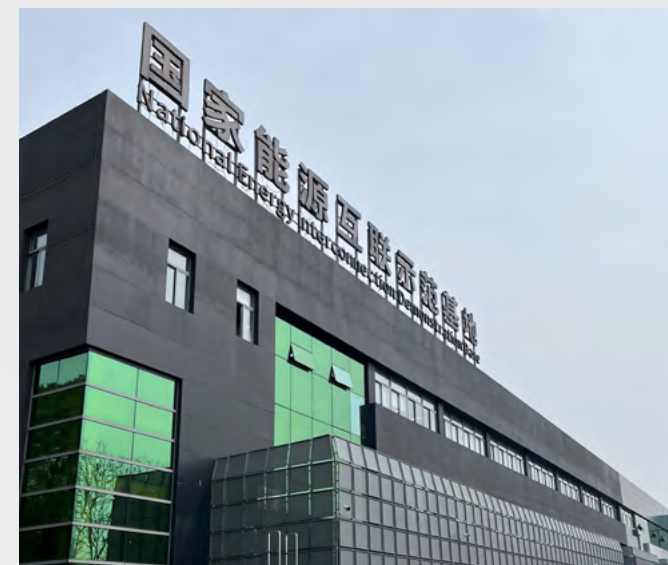


Initial Shortlisting & Market Analysis

Ampol Procurement considered the possible manufacturers of the product which included a broad range of regions of potential suppliers. The consideration included price, quality, reputation, financial and operational stability and human rights considerations.

Interviews

Ampol conducted a range of informal meetings with potential suppliers to better understand the manufacturing capabilities, lead times, technical overviews and supply chains. The interview phase enabled Ampol to position its Supplier Code of Conduct with potential suppliers and set the requirement that if business is conducted with Ampol, compliance would be compulsory.



Shortlist & RFP Phase

Ampol narrowed the potential shortlist of suppliers and issued a Request For Proposal (RFP). As part of the RFP process, Ampol issued its modern slavery questionnaire and included specific questions on modern slavery and safety (amongst other commercial questions and technical capabilities). Ampol scored potential suppliers in all areas including modern slavery. An internal Ampol evaluation team was established to consider responses. Potential suppliers were required to satisfy Ampol's expectations prior to moving to the next phase.

Following the Shortlist & RFP phase (which also included a round of product testing), two suppliers were advanced to the next phase.



OUR SUPPLY CHAINS CONTINUED

CASE STUDY

CHARGERS & SITE VISITS – CHINA CONTINUED



Site Visits

In Q1 2024, Ampol sent a team to visit and evaluate the two shortlisted manufacturers in China. The Ampol team visited locations where chargers were installed, reviewed factory testing in the office, and charger production lines (factory visit). The Ampol team were exposed to workers performing the assembly and manufacturing work which enabled a direct observation and evaluation of modern slavery-related matters. This included a consideration of working conditions and environment – for example heat, light, cleanliness and ventilation.

The Ampol delegation took photographic evidence of products, manufacturing processes and working conditions of both suppliers to enable an information decision-making process as to supplier selection.

A key determinant of Ampol's decision on supplier was the direct observations of the workplace which gave rise to a conclusion of both product quality and reliability which formed a key outcome of worker conditions. Ampol concluded that better working conditions, automation, safety and higher skilled workers resulted in higher quality products and reliability of the supply chain.

Modern Slavery Risk Assessment

Following the identification of the leading supplier, and prior to making its final decision, Ampol commenced a modern slavery risk assessment through its standard modern slavery risk assessment. This included a consideration of contractual terms, a review of the Supplier Code of Conduct questionnaire and a detailed modern slavery questionnaire and an assessment of responses. Ampol then sought evidence to support the responses in the questionnaire including processes and procedures. This included safety, workforce and training policies and evidence.

Ongoing Due Diligence

Since selecting its preferred supplier, Ampol has put into place a plan for ongoing monitoring of the risk the supply of electronics presents. This has included:

- The implementation of certain Key Performance Indicators (KPIs) with the upstream supply chain of the supplier, including evidence of a minimum of two examples of the modern slavery risk assessment the vendor has with their suppliers (for example, electronic component suppliers to the manufacturing process),
- Compliance and evidence with the vendor's forced labour compliance manual, including evidence of training and employee signatories, and
- The assessment (ongoing) of the supplier in Ampol's new *Fair Supply* platform.

MODERN SLAVERY RISKS AND PRACTICES

Ampol continued to innovate with changing products and services in 2024. From the ongoing expansion of our Quick Service Restaurant (QSR) offering through to home charging and at-destination charging.

The constant evolution in the products and services we offer results in a continuous need to review the supply chains in which we operate for modern slavery risk.

In 2024, we continued the rollout of our Quick Service Restaurant (QSR) strategy through our Hungry Jack's and NoodleBox branded sites. This is in addition to our expanding Boost Juice offerings. The supply chain associated with these new businesses contain different risk factors than those in our traditional transport fuels businesses.

As Ampol pursued its Energy Solutions strategy in 2024, Ampol's supply chain included the procurement of different types of EV chargers. These new supply chains present different modern slavery risk compared to that of transport fuels.

By reason of the complexity of Ampol's supply chains and the modern slavery risks that they present, Ampol continues to maintain a detailed modern slavery risk assessment process, which can operate across all our Australian business units and enables us to identify areas of concern.

The modern slavery risk assessment process utilises established risk indicators and indices (such as the United States Department of Labor 2018 list of goods produced by child or forced labour and the Global Slavery Index 2018) to identify where there are potential modern slavery risks in our operations and supply chains.

Following the risk assessment, and for any proposed supplier that is not considered low risk, Ampol then requires proposed suppliers to complete a Self-Assessment Questionnaire (SAQ). The material returned from the proposed supplier is then subject to a review of the supplier's:

- own modern slavery statement (or equivalent material);
- internal policies; and
- evidence to support the SAQ responses.

Ampol will then seek further information where necessary to understand the modern slavery risk of a proposed supplier.

Having identified the potential risk, Ampol will continue to ensure due diligence by way of a series of ongoing deep dives for existing suppliers. Selection of ongoing risk assessments in 2024 was based on spend and risk profile.

Our risk assessment process has identified ongoing and new potential risks of modern slavery practices in Ampol's operations and supply chain, arising through:



Procurement of high-risk products for resale or to support business operations, for example:

- Coffee purchased for resale at Ampol retail stores and electronics used by Ampol employees; and
- Other products considered high risk include tobacco, seafood, cocoa and solar panels.



Procurement of high-risk services, for example:

- Contract cleaning services at Ampol sites; and
- Transportation of Ampol products, such as contract carriers that Ampol engages to move its transport fuels.



Interactions with high-risk industries, for example:

- Shipping, with Ampol regularly chartering vessels to move its crude, feedstocks and refined products;
- Agriculture, with Ampol selling biofuels which include agriculture feedstock and fruit & vegetables at its retail stores; and
- Construction of Ampol retail sites.



Reliance on vulnerable workers, for example:

- Foreign visa holders in both Ampol controlled and non-company-controlled retail sites;
- Young workers at Ampol's QSR sites; and
- Family and other small businesses suppliers with smaller local suppliers (for example fish bait) where there is less rigour and formality in the employment relationships.



Use of high-risk business models, for example:

- 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.



Procurement from high-risk countries, 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;
- the purchase of cocoa-based products from large multinationals where the product is farmed in West Africa giving rise to child labour risk;
- Sourcing EV chargers from multiple providers which are manufactured in high-risk countries; and
- Chemicals sourced from international suppliers.

MODERN SLAVERY RISKS AND PRACTICES CONTINUED

MODERN SLAVERY RISK – Z ENERGY

Z Energy continues to align its approach to modern slavery with that of the Ampol Group. This has been achieved in 2024 through the adoption by Z Energy of various Ampol Group standards and processes.

Since the acquisition of Z Energy in 2022, Ampol and Z Energy have integrated many of their functions including the transport fuels supply chain. Due to the similarity in business operations, the risks of modern slavery at Z Energy are similar to that of Ampol's operations in Australia.

Risks of modern slavery that exist at Z Energy include:

Higher risk business models:

- Z Energy does not directly operate retail sites. Within this model, there are vulnerable worker risks within the operator businesses. This includes a reliance on foreign visa holders and issues associated with compliance with local workplace laws.
- In Bulk Fuels, Z Energy engages some workers through third party contractual arrangements (labour hire).

High Risk Products & Sourcing Risk

- The Z Energy retail network sells similar products to the Australian Convenience Retail business. This includes agricultural products, electronics and products from higher risk industries.
- For its Z Energy sites, Z Energy performs the shop procurement and has oversight with respect to the supply chain. For Caltex-branded sites, individual operators separately procure the supply for their shop products. This gives rise to modern slavery risk due to the opaque nature of the supply chain itself.

FUTURE ACTION

In 2025, Z Energy will adopt the Ampol Group Human Rights Policy, enabling a uniform approach to modern slavery across the Group.

GOVERNANCE

We maintain a robust corporate governance structure to mitigate modern slavery risks.

We believe adopting a high standard of corporate governance is essential to ensuring modern slavery risks are appropriately managed at Ampol. The following governance structure supports the management of modern slavery risks 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 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 is outlined in our Corporate Governance Statement which is available on the [Ampol website](#).



MODERN SLAVERY RISKS AND PRACTICES CONTINUED

OUR POLICIES AND EXPECTATIONS

Corporate Governance Statement

Ampol is committed to acting lawfully, ethically and responsibly, which plays a critical role in our success as an organisation and our ability to generate shareholder value.

Ampol Values and Code of Conduct

Ampol's approach to modern slavery risks is underpinned by the Ampol Values.

The Ampol Code of Conduct defines the standards of conduct and behaviour expected from all employees, directors and officers of the Ampol Group. Ampol also expects external parties with whom we engage, including suppliers and customers, to act in accordance with our code. The code sets the foundation which defines 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 Organisation 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 to respect human rights, Ampol needs to manage any adverse human rights impacts which we may cause or to which we may contribute or be linked.

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

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 (SCoC) 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 on the [Ampol website](#).

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 on the [Ampol website](#). It was last reviewed in 2023.

Z Energy Supplier Code of Conduct

The Z Energy Supplier Code of Conduct (Z SCoC) for the Z Energy Group is embedded in all of Z Energy's standard supplier contracts. The objective of the Z SCoC is to set clear expectations with all Z Energy suppliers regarding ethical, social and environmental business practices. The Z SCoC provides a framework for meaningful and collaborative partnerships that ultimately work to enhance our communities, increase efficiency and reduce our environmental impact together.

In all Z Energy supplier contracts, Z Energy includes a standard term which sets expectations with respect to compliance with the terms of the Z SCoC. Where Z Energy uses a supplier's standard contract, it requires compliance with the Z SCoC through the onboarding process.

FUTURE ACTION

In 2025, Z Energy will progress a project which relates to how it procures uniforms across its retail network. Having regard to the identified risks involved in the textiles industry, Z Energy will seek visibility of the full supply chain and put controls in place to reduce or eliminate the risks to modern slavery which may include site visits and other assurance activities.



MODERN SLAVERY RISKS AND PRACTICES CONTINUED

SUPPLIER ENGAGEMENT

Ampol Supplier Code of Conduct compliance

The Ampol Supplier Code of Conduct (Ampol SCoC) sets out the minimum expectations of counterparties across the key areas of labour and human rights, ethical business practices, health & safety and sustainability. In 2019, Ampol commenced proactive engagement with suppliers to assess their compliance with the expectations set out in the code through a supplier questionnaire administered via Ampol's supplier risk management platform.

The Ampol SCoC questionnaire allows Ampol to obtain information directly from a proposed supplier and to identify gaps in a counterparty's ability to comply with the expectations set out in the code and address these gaps.

This questionnaire remains a mandatory step in our supplier onboarding process. As at December 2024, 86% of Ampol's existing supply base,* by spend, have completed the questionnaire, exceeding prior commitments of 80%.

The modern slavery SAQ process considers the following information obtained directly from the supplier:

- Workforce information including number of workers, their engagement status (full time, part time, casual, seasonal or contracted through third parties);
- Evidence of past audits and certifications including social, ethical and environmental;
- Modern slavery policies, statements and any training conducted by the supplier on modern slavery matters;

- Detail as to how the supplier conducts due diligence for modern slavery risk including within their supply chains;
- The use of child labour including checks (if any) the supplier conducts both internally and including within their supply chains;
- Policies dealing with wage deduction, retention of employee personal documentation and security deposits;
- Information relating to contracts of employment, language used in contracts, worker accommodation, ability for workers to freely resign and workplace compliance including minimum wages and pay slips; and
- Grievance management processes and policies including how workers may anonymously raise concerns regarding labour conditions.

Ampol has continued to improve the supplier due diligence framework which commenced in 2019. In 2024, Ampol improved its framework again through the introduction of the *Fair Supply* platform. See page 24 for detail.

In addition to the Supplier Code of Conduct questionnaire process, during 2024 Ampol commenced a process to assess all suppliers having regard to industry and location and with the benefit of the new *Fair Supply* platform (this exceeds the assessment in prior years of only the top 100 suppliers). This represents almost 100% of all spend (excluding retail). The assessment found that:

- 1% of suppliers would be considered high risk;
- 24% suppliers as medium risk; and
- 75% suppliers being low risk.

Our expectations are communicated to suppliers through making the code available publicly, the SCoC supplier questionnaire, contractual agreements or when registering for tenders.

Since 2021, all new suppliers** must acknowledge the code during onboarding and contracted suppliers must complete the supplier questionnaire prior to onboarding as part of the supplier qualification process.

FUTURE ACTION

Ampol will continue to ensure that a minimum of 80% of our suppliers, when measured by spend, complete the Supplier Code of Conduct questionnaire. If high risk suppliers are identified, we will engage with them specifically on the issue of modern slavery.

Contractual clauses and tender questions

Ampol continues to require suppliers to agree to Ampol's precedent modern slavery terms. Where suppliers raise concerns with the terms, Ampol seeks to work with the supplier for a cooperative outcome.

The Ampol modern slavery terms include requirements for supply chain suppliers 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

Ampol will continue to transition existing suppliers upon renewal of their contracts to updated precedents and clauses.

* Excluding Convenience Retail shop procurement.

** Within Ampol's retail business, proposed suppliers are separately assessed by way of a pre-questionnaire, retail supplier questionnaire and an online assessment. See page 25 for detail.



MODERN SLAVERY RISKS AND PRACTICES CONTINUED

CONTINUED FOCUS ON DUE DILIGENCE

Ampol continues to operate in accordance with the Modern Slavery Risk Assessment and Mitigation Standard which was introduced in 2021.

The Standard provides a framework for assessing and addressing modern slavery risks when purchasing goods and services. The Standard is due for review in 2025.

Ampol continues to make significant progress with its modern slavery program, embedding due diligence procedures into the standard supplier pre-qualification process.

CORPORATE PROGRAM

A major element of our program is the Supplier Code of Conduct Questionnaire. This document obtains relevant information from proposed suppliers to enable Ampol to assess the risks of modern slavery during the engagement process.

The questionnaire enables Ampol to consider the following risks:

- The location of the supplier and the use of offshore labour.
- Whether the supplier has its own supplier code of conduct or similar.
- Freedom of association.
- Wages and working hours.
- The extent to which the supplier has policies and action plans with respect to managing modern slavery risk.
- Representation, equity and inclusion.
- Bribery and corruption.
- Sanctions.
- Whistleblowing and grievance mechanisms.
- Child labour.
- Health and safety.

IN 2024

- 86% of new suppliers (excluding Convenience Retail) acknowledged and accepted our Supplier Code of Conduct when commencing as a new supplier.
- Ampol has made it a policy to ensure that renewals and recontracts with existing suppliers will include contractual provisions relating to the Supplier Code of Conduct and modern slavery obligations or an equivalent term as negotiated.

In addition to the supplier onboarding processes, during 2024 Ampol introduced a real-time monitoring service using a third-party provider. Through this service, Ampol maintains its risk assessment by way of third-party monitoring of adverse media events related to human rights and modern slavery. This ongoing monitoring enables Ampol to be alerted if any of its contracted suppliers are involved in any modern slavery event.



CASE STUDY FAIR SUPPLY



In 2024, Ampol commenced a review of its entire supplier assessment processes, which included the assessment processes for ESG and modern slavery purposes.

Ampol assessed the market for modern slavery due diligence platforms, which integrated both risk assessments, questionnaires and collated external information enabling a rating/risk scale.

Fair Supply was selected for a variety of reasons including that the screening of suppliers went beyond the company, location, industry and spend. The product provided a risk profile up to and including tier 10 of the supply chain. This enabled a view of industry risk along the length of the supply chain, rather than simply the direct supplier with which Ampol would normally contract.

* Tier 1 refers to suppliers that Ampol contracts with directly.

The platform provides a rating for modern slavery risk mitigation. It also contains a portal that enables Ampol to issue its questionnaires, and the supplier is then required to answer the questions and upload evidence to support their responses. This includes policies, processes, grievance mechanisms, the due diligence program applied by the supplier and actions to remedy risks when they arise. The platform then reviews the responses provided by the supplier and provides a risk mitigation rating which considers the responses and identifies areas for improvement and further opportunities for due diligence.

Additionally, where a supplier has engaged with another business and completed an assessment process, Ampol has visibility of the risk rating for that process. This visibility enables Ampol to better understand the risk of a supplier in different contexts.

This uplift in capability allows the Ampol team to go beyond tier 1 when assessing suppliers and supports the team to assess a supplier's maturity in how they address modern slavery risks.* This enables Ampol to collaborate better with suppliers and mitigate risks through contract clauses and key performance indicators which are monitored throughout the life of a contract.

FUTURE ACTION

During 2025, Ampol will commence extending the Fair Supply system to its retail modern slavery program. This will likely commence with prioritising the high risk suppliers and new suppliers, with an intention to roll out the system to all suppliers.

MODERN SLAVERY RISKS AND PRACTICES CONTINUED



RETAIL PROGRAM

In Convenience Retail, Ampol deploys a number of assessment tools when engaging a new supplier or during the ongoing supply relationship*. The assessment tools that are applied in each case depend on the nature of the industry and supplier. The proposed introduction of the Fair Supply platform to the retail program in 2025 is intended to improve the program. The retail program as of December 2024 includes:

Pre-Questionnaire Assessment

The pre-questionnaire is an assessment tool for retail category managers to make an initial assessment of a proposed supplier early in the procurement process. The pre-questionnaire considers the industry (flagging already known high risk industries), geographic origin of the supplier, common employment constructs in those industries/locations and other factors that may provide an early indicator of risk.

The pre-questionnaire will then inform the extent to which further assessment tools are applied.

Retail Supplier Questionnaire

The supplier questionnaire is used to assess a broader range of criteria (including non-modern slavery criteria) for a proposed supplier. For modern slavery purposes, the questionnaire includes questions relating to working conditions, worker accommodation, child labour and grievance mechanisms.

Online Assessment

The online assessment is an independent due diligence process conducted by Ampol which considers a range of available information about the proposed supplier. Prior instances of workplace breach or other modern slavery matters may arise during this assessment process. The online assessment also includes a review of any publicly available information regarding the supplier's modern slavery policies and statements.

In 2024, Convenience Retail conducted online assessments of 142 suppliers, of which 72 had some form of assessable published modern slavery statement (from Australia or other jurisdictions) or policies.

Site Visits

Ampol continues to conduct site assessment of supplier operations for those based in Australia. The site visits satisfy a number of areas of interest to Ampol (including food safety and product quality), and also operate as a risk identification opportunity for modern slavery purposes.

11 site visits were conducted on ongoing trade suppliers in 2024, including 3 suppliers within the moderate to low risk categories.

FUTURE ACTION

During 2025, Ampol will develop a specific site-visit checklist for Ampol representatives. Site visits will be driven by the results of the Fair Supply risk ratings. The checklist provides a number of assessment areas including health & safety, hygiene, worker entitlements and migration matters to be observed or otherwise understood during the visit.

Reasonable Steps

In addition to product supply chains, Ampol recognises the risks of modern slavery in the operations of its retail partners. As part of Ampol's Reasonable Steps Program, validation checks at franchise and associated sites in Australia continued to plan. See Page 27 for further detail on the program.

* Different supplier assessment and methodologies operate concurrently for operational and geographic reasons between Ampol retail suppliers and non-retail suppliers. See the Corporate Program section on page 24 for non-retail suppliers.

MODERN SLAVERY RISKS AND PRACTICES CONTINUED

RISK AREA DEEP DIVES

Ampol continues to prioritise suppliers that are identified as part of the risk identification process for deep dives. The deep dive process uses a combination of some or all of the following:

- Detailed discussions with subject matter experts within Ampol.
- Site visits of local suppliers.
- Detailed modern slavery questionnaires, administered via Ampol's supplier risk management platform.
- Meetings with suppliers to engage on the issue of modern slavery.
- Ongoing implementation of our Modern Slavery Risk Assessment and Mitigation Standard.

Insights from the deep dives are used to inform our approach to modern slavery risk and have allowed Ampol to identify additional mitigation steps. These additional mitigations steps include activities such as targeted training, changes to the Reasonable Steps program and the use of modern slavery contractual clauses.

FUTURE ACTION

The modern slavery risk assessment has been embedded into our corporate supplier prequalification process, and it will continue to be mandatory for all new suppliers to be assessed on potential modern slavery risks. Ampol commits to continuing deep dives on suppliers as assessed by risk with the benefit of new platforms and tools.

CASE STUDY SUPPLIER DEEP DIVE



During 2024, Ampol completed a tender process to engage a new national supplier for its grocery goods for all Ampol stores.

The tender related to common grocery products that Ampol does not source directly from the manufacturer or producer. Ampol engaged in a process to require that both the new national supplier satisfy Ampol's expectations on modern slavery, and also the suppliers to the new national supplier.

During the review, Ampol identified a number of higher risk categories including agricultural suppliers and suppliers that use labour hire. Ampol also identified specific product groups that were identified as a higher modern slavery risk, such as the fish products. Ampol reviewed documentation obtained from the new national supplier including its own modern slavery statement.

By reason of the breadth of grocery and fresh food products involved, Ampol required that each supplier in the supply chain of the new national supplier be Sedex-registered and was subject to regular audits. Sedex (Supplier Ethical Data Exchange) is a platform that enables the sharing of supply chain data. It enables visibility along the supply chain to identify and manage risk.

Ampol was able to engage the new national supplier on terms which included regular reporting, the regular provision of information from the national supplier, and the ability for Ampol to conduct audits on modern slavery matters as needed. The terms focus on cooperation between Ampol and the supplier to enable continuous improvement.

MODERN SLAVERY RISKS AND PRACTICES CONTINUED

SPECIFIC RISK MITIGATION FOR HIGHER RISK AREAS

Entry-level workers at Australian non company-controlled sites

While not directly part of our operations, Ampol recognises the potential risk of exploitation of base-skilled workers employed as shop assistants (Console Operators) throughout our 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.

Whilst Ampol does not have direct control over the working conditions of employees within the extended network, Ampol has a workplace compliance program (Reasonable Steps Program) whereby Ampol takes steps to help ensure fair and legal treatment of workers employed throughout our associated retail sites.

Within Ampol's non-controlled network in Australia, the Reasonable Steps Program includes:

- Contractual obligations to comply with workplace laws;
- Workplace compliance audits;
- A phone advice line where associated sites can call and get free advice on workplace compliance and related matters on a confidential basis; and
- Access to a dedicated hotline for employees wishing to confidentially raise wage or visa non-compliance (including the ability to raise concerns anonymously).

Since the program commenced, approximately 475 sites have been audited, and appropriate remediation action taken where issues were identified.

Franchise Sites

In 2018, Ampol commenced the process of transitioning franchise sites to company operations, which has resulted in a continued reduction in the risk of exploitation within this part of the network.

At the end of 2022, five franchise sites remained, and at the end of 2023, only four sites remained. Ampol continued to require audits of these sites maintaining the same standard of compliance.

At 31 December 2024, Ampol no longer had franchised sites in its network.

Associated sites (other than franchise sites)

During 2024, Ampol engaged independent auditors to conduct:

- 25 audits in its dealer network.
- 3 audits in its distributor network.

FUTURE ACTION

In 2025, Ampol will continue its practice of auditing at least 10% of its Distributors, and 10% of its dealer sites, for workplace compliance.

CASE STUDY CONTINUOUS IMPROVEMENT – DEALER CODE OF CONDUCT

During 2024, Ampol introduced a Dealer Code of Conduct which covers its entire Australian dealer network.

The Code of Conduct is intended to operate in a similar manner to the Supplier Code of Conduct, however its scope covers independent businesses who operate under the Ampol brand.

The Dealer Code of Conduct is designed to ensure Ampol Dealers apply Ampol's expectations in terms of Labour & Human Rights, Ethical Business Practices and Sustainability.

Specifically, and relevant to modern slavery risk management, the Dealer Code of Conduct:

- Expects Dealers to ensure all their employees freely choose to work, and that there are no forms of compulsory or forced labour.
- Requires all workers are of at least the legal minimum age and that juniors are engaged in a manner consistent with workplace law and applicable award terms.
- Expects Dealers to comply with all applicable industrial awards and agreements which include compliance with minimum wages, hours of work, rostering and leave.

- Requires Dealers to provide a workplace that is free from discrimination on the basis of gender, age, race, ethnic or social origin, disability, family status, political views, religion, sexual orientation or carers' responsibilities.
- Expects Dealers to allow and respect employee representation and collective bargaining.

The Dealer Code of Conduct was launched in the Ampol Dealer communications portal. The purpose of the portal is to communicate various Ampol policies that apply to the Ampol Dealer network.

FUTURE ACTION

During 2025, Ampol will take steps to further communicate the Dealer Code of Conduct and consider mechanisms to ensure Dealers read and accept its terms.

MODERN SLAVERY RISKS AND PRACTICES CONTINUED

SEAFARER WELFARE

Ampol's transport fuel supply chains are reliant on shipping and seafarers to move crude, feedstocks and refined products. In recognition of seafarers' particular vulnerability to exploitation, Ampol utilises a vessel-vetting process to ensure counterparties moving our crude, feedstocks and refined products by ship provide fair and safe working conditions for their crew.



The welfare of seafarers continues as a modern slavery priority, and we continue to ensure we monitor any guidance notices issued by the Australian Maritime Safety Authority (AMSA) to ensure seafarer health and wellbeing.

In response to AMSA's guidelines, Ampol remains vigilant and continues to maintain due diligence steps to ensure it is understood how long each crew member has been on board a ship. For any crew member approaching 11 months of continuous service, Ampol will query their repatriation plan.

Ampol will not charter a vessel if it cannot be satisfied that the vessel operator's practices are in line with Ampol's human rights and modern slavery policies.

Ampol charters vessels on a singular voyage basis for the majority of its energy logistics supply chain. In 2024, Ampol engaged 6 time-charter vessels, which refers to vessels hired for an extended period of time. A time-charter arrangement allows Ampol to have greater operational control in the manning of the vessel through regular and periodic discussions with the technical operators, thus ensuring compliance with labour regulations and modern slavery requirements.

In 2024, Ampol's Marine Assurance Team performed 955 assessments. 2 vessels were rejected for reasons relating to crew experience/capability and 53 vessels were rejected for technical safety concerns. No vessels were rejected in 2024 for reasons linked to modern slavery-like practices.

Ampol's vessel rejection rate is relatively low by reason of the standards Ampol applies throughout its chartering process. Vessel operators with lower standards of compliance in all areas (including modern slavery) are avoided prior to any engagement by reason of the diligence applied at the early stages of the process.

Ampol's ongoing identification and mitigation of modern slavery risk in its Trading and Shipping operations includes:

World Check/PurpleTrac

Using World Check and PurpleTrac (third-party due diligence screening tools), 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.

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 to identify issues and avoid using vessels detained by the PSC due to unsatisfactory crew conditions.

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.

Industry engagement

Ampol continues to participate in industry dialogue to discuss labour standards, crew health and safety and how we, as consumers of maritime service, can contribute to a more sustainable and equitable shipping industry.

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.

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.

ITF ship lookup

Administered by the International Transport Workers' Federation (ITF), the lookup provides a succinct overview of any concerns identified by the last ITF inspection conducted on board. Where an ITF inspection uncovers problems, including but not limited to low wages, sub-standard living conditions and general employment issues, clarification and further information can be obtained from the vessel's technical operator. The ITF lookup is not an industry-wide practice for vessel clearance and something Ampol elects to do to provide additional assurance.

FUTURE ACTION

In 2025, Ampol will continue its Marine Assurance program (see the Ampol 2023 Modern Slavery Statement for detail on the program).

MODERN SLAVERY RISKS AND PRACTICES CONTINUED

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 our activities are causing, contributing to, 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.

Z Energy

Any staff or contractor of Z Energy Limited who becomes aware of a legal, regulatory, policy or other compliance issue, or a breach of Z Energy Limited's Code of Conduct also have access to a dedicated whistleblower service.

In November 2024, Z Energy made its Deloitte Whistleblower service available to Z Energy retail employees. Whilst not employees of the Z Energy business (by reason of the franchising arrangement), the extension of the Whistleblower service provides a further grievance mechanism to raise concerns relating to human rights, discrimination and other matters relevant to issues of modern slavery through the Z Energy supply chain. The employees were notified by way of safety meetings which included information on how to make a disclosure including telephone numbers and the website address.

The successful rollout of the Whistleblower service enables a separate, confidential and anonymous channel for employees within the Z Energy supply chain to raise concerns and enable Z Energy to take action to mitigate the risk of modern slavery in this part of its business.

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.

Reports made to the Ampol Hotline are monitored and reported to the Executive General Manager, Group General Counsel, Regulation and Company Secretary and the General Manager, Group Risk and Audit on a monthly basis as well as the People & Culture Committee of the Ampol Board of Directors on a six-monthly basis.

CONTINUOUS IMPROVEMENT

Ampol prioritises the protection and support of victims of modern slavery. We are committed to best practice corporate governance and regularly review our internal documents and processes. For modern slavery purposes, continuous improvement at Ampol is achieved through:

- The regularity and ongoing nature of our modern slavery working group;
- The ARMF and Enhanced Compliance Program;
- Ongoing reviews and reporting of employee and stakeholder grievance data and the learning opportunities the data presents;
- External engagement;
- Training data and feedback from participants; and
- This statement and the necessary development, consultation and approval processes.

FUTURE ACTION

By the end of 2025, Ampol will have rolled out facilitated training sessions on the Whistleblower grievance mechanism to senior employees which includes ongoing Whistleblowing training to the Ampol Board.



MODERN SLAVERY RISKS AND PRACTICES CONTINUED

TRAINING

Ampol employees are trained on Ampol's Code of Conduct obligations and expectations every two years using a mandatory online training module.

All employees and contractors are required to acknowledge and agree to the Ampol Code of Conduct when onboarding. Breaches of the Ampol Code of Conduct can be reported through Ampol's People and Culture team, a person's manager or the Ampol Hotline, and are monitored and reported to the People & Culture Committee of the Ampol Board of Directors every six months.

The Ampol Code of Conduct comprehensively covers modern slavery, however additional groups of employees identified to be working in higher risk areas are required to undertake more detailed mandatory modern slavery training.

During 2024, Ampol continued the use of its modern slavery online learning module across its Australian and international entities. The modern slavery course formed part of a mandatory group of compliance training modules. The module is targeted at personnel who make supplier purchasing decisions, labour-related decisions or are key members of management who may give effect to Ampol's commitment to eliminating modern slavery.

The course includes the following content:

- Ampol's approach to modern slavery.
- Definitions and descriptions of modern slavery.
- Modern slavery facts, using data and case studies.
- Modern slavery high risk areas and goods and services.
- Why Ampol needs to understand its modern slavery risk.
- How Ampol is mitigating modern slavery in its supply chain.

152 employees (within the joint reporting entities) were identified and required to complete the modern slavery awareness training which has a two-year compliance cycle. The current completion rate of the training is 99.4% (representing employees who were scheduled and completed the training).

FUTURE ACTION

Ampol will continue to apply the modern slavery module as a Group compliance topic which is mandatory for all identified leaders or decision-makers who may be in a position to make a difference consistent with Ampol's modern slavery objective.

CASE STUDY REASONABLE STEPS TRAINING AT ASSOCIATED SITES

During 2024, Ampol rolled out quarterly training sessions for all its associated sites (both the dealer and distributor networks).

The training sessions were intended to educate associated site operators on their obligations as employers, with a particular focus on compliance with workplace law. The sessions were conducted by the Australian Industry Group (Ai Group), a peak industry body with expertise in workplace relations and employment law. The training sessions were conducted by way of live online facilitated sessions by a member of the Ai Group workplace relations team.

The training sessions comprised of one-hour interactive sessions (for online participants) covering the following content:

- **Session 1** – Award minimum rates (including penalty rates and overtime) and other conditions under the Vehicle Repair, Services & Retail Award which is relevant for associated sites which engage Console Operators in their fuel retail businesses.
- **Session 2** – Managing performance and misconduct. The session included a discussion on employee rights (and employer responsibilities) with respect to the unfair dismissal jurisdiction within the *Fair Work Act 2010* (Cth).

- **Session 3** – Management of ill or injured workers, including employee rights & obligations with respect to domestic violence leave and personal leave. The session concluded with a section on the general protections afforded to employees under the *Fair Work Act 2010* (Cth).
- **Session 4** – Employer record keeping requirements under the *Fair Work Act 2010* (Cth) including records for part time employees and remuneration, leave and payslip records. The session also covered recent learnings from a Fair Work Ombudsman prosecution matter involving an employer within the same industry. The session ended with a general employment law update including a section on the new employee right to disconnect and limits on fixed-term contracts of employment.



ASSESSING EFFECTIVENESS AND CONSULTATION

We continually look to improve the measurements of effectiveness of our modern slavery program.

The Ampol Group assesses the effectiveness of the actions we take 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. This has included engagement with subsidiary boards.
- **ARMF:** The status and effectiveness of control measures relating to modern slavery risks are assessed via Ampol's ARMF risk assessment process.
- **Policies:** Periodic scheduled reviews of relevant policies, including the Ampol Group Modern Slavery Risk Assessment and Mitigation Standard due for review in 2025.
- **Supplier Code of Conduct compliance:** Monitoring the number of suppliers who acknowledge Ampol's SCoC, the number of suppliers who complete the SCoC supplier questionnaire and the number of verification assessments completed.
- **Ongoing Mitigation:** Continuous monitoring using third-party platforms to be alerted of the existence of modern slavery risks and events.
- **Audit:** The internal audit function, through their strategic planning process, provide the Board and management with an independent and objective assessment of the adequacy, effectiveness, and efficiency of Ampol's risk management, control and governance processes.
- **Modern Slavery Working Group:** The working group forms the core team that is responsible for delivering on the initiatives contained within each annual statement and is responsible for the drafting of the statement content itself. It is through the continuous process of objective setting, delivery, and reporting that assessment of effectiveness occurs.
- **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 and feedback on the content.
- **Grievance mechanisms:** Monitoring and reporting (to the Ampol Board) 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.

EXTERNAL ENGAGEMENT

During 2024, Ampol engaged with third parties to obtain feedback on its modern slavery reporting and sought opportunities for improvement. This included investor reports, research, and comparative literature. In 2024, Ampol joined the Australian Industry Group modern slavery reference group which conducts quarterly sessions involving guest speakers and other material to assist member companies in their response to mitigating the risk of modern slavery.

Further, representatives from Ampol attended industry association events and roundtables on a range of modern slavery topics including wage underpayment and sex-based harassment.

During 2024, Ampol's procurement team sent representatives to attend various forums and conferences including law firm updates and procurement industry events which included modern slavery speakers and related content. During the year, representatives from Ampol attended and presented at a procurement forum where Ampol was given the opportunity to participate in an industry discussion on its approach to modern slavery and ESG matters within the procurement context.

During 2025, Ampol will continue its external engagement including taking advantage of its industry associations to participate in modern slavery working groups and to attend future external sessions.

FUTURE ACTION

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



ASSESSING EFFECTIVENESS AND CONSULTATION CONTINUED

CONSULTATION WITH OWNED OR CONTROLLED ENTITIES, INCLUDING REPORTING ENTITIES

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

Ampol convenes a regular modern slavery working group which discusses annual reporting, targets, progress towards targets, systems, processes, program effectiveness and legal issues associated with modern slavery. The working group is a global team comprised of representatives from all parts of Ampol's business (and representatives of the joint reporting entities) and forms a key operational consultative role in the development of this report.

Prior to approval by the Ampol Limited Board of Directors, and in the preparation of this statement, consultation sessions were conducted with:

- Key members of the Ampol Leadership Team (ALT) responsible for the overall management of all the reporting entities; and
- Directors or senior leaders representing each of the joint reporting entities.

During the development of this statement, members of the modern slavery working group consulted with the following entities (including individual executives, directors or senior leaders representing those entities). During those discussions, feedback was sought on the draft statement content including supply chain description, modern slavery risks, actions to assess and address those risks and future actions.

Entities Owned or Controlled:

- Z Energy Ltd
- Ampol QSR Pty Ltd
- Ampol International Holdings Pte Ltd
- Ampol Singapore Trading Pte Ltd
- Ampol Shipping & Logistics Pte Ltd
- Ampol Management Services Pte Ltd

Entities forming part of this Joint Statement:

- Ampol Australia Petroleum Pty Ltd (ACN 000032128)
- Ampol Retail Pty Ltd (ACN 000175342)
- Ampol Petroleum Distributors Pty Ltd (ACN 005632860)
- Ampol Property Trust (ABN 41 830 779 954)
- Ampol Energy (Wholesale Trading) Pty Ltd (ACN 660 016 062)

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.





OTHER RELEVANT INFORMATION AND APPROVAL PROCESS



Collaboration increases the potential for meaningful change.

We recognise that modern slavery is not a thing of the past and this complex issue requires us to work collaboratively with our suppliers, customers, governments and our communities.

Meaningful change and effective solutions require collaboration with governments, the private sector and society. Further, 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 can bring about meaningful change.

COMMITMENTS AND COLLABORATION

The Ampol Foundation continues to be a vehicle through which we deliver our community investment strategy. By leveraging our financial strength, our network, and our people, we aim to bring value and build capacity in the communities in which we operate with the focus on improving the lives of Australians. Supported by the Ampol Leadership Team and led by a committee of employees, the foundation focuses activities on two key social areas of need – youth education and development, and community wellbeing and safety.

Our total community investment contribution via the Ampol Foundation for 2024 was over \$4.66m. Ampol's Convenience Retail business supported three organisations through two in-store fundraising campaigns with total fundraising as follows:

- **Sebastian Foundation** – over \$248,000
- **The Smith Family** – over \$264,000
- **Surf Lifesaving Australia** – over \$310,000

Further, Z Energy continued its Good in the Hood community investment initiative. Since its inception over a decade ago, over NZ\$11 million has been donated to groups working to make a positive change within their communities.

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 2024 Annual Report.

APPROVAL PROCESS

This statement was reviewed and approved by the Board of Directors of Ampol Limited on 19 June 2025. The Ampol Board of Directors will review and update this statement on an annual basis.

Matthew Halliday
Managing Director and CEO