



Modern Slavery Statement  
2024



# Contents

Message from the CEO	01
2024 highlights	02
Reporting entities and requirements	03
1 Sustainability and human rights governance and processes	04
2 Our structure and organisation	08
3 Our workforce and operations	14
4 Our supply chains	18
5 Identifying, assessing and addressing our modern slavery risks	22
6 Assessing effectiveness and looking forward	32
7 Consulting with our business	36

## Acknowledgement

Viva Energy Australia acknowledges and pays respect to the past, present and future Traditional Custodians and Elders of this nation and the continuation of cultural, spiritual and educational practices of Aboriginal and Torres Strait Islander peoples. We particularly pay respects to the Traditional Custodians of the land, across the nation where we conduct business. We also acknowledge our gratitude that we share this land today, our sorrow for the costs of that sharing and our hope and belief that we can move to a place of equity, justice and partnership together.

Title: Wa-ngal yalinguth, yalingbu, yirramboi

Created by: Dixon Patten, Yorta Yorta and Gunnai, Bayila Creative (commissioned by Viva Energy in 2019)



# Message from the CEO



As we grow and diversify, we will continue to play our part to identify key risk areas within our operations and supply chains and to prioritise and influence change in those areas.

2024 was another transformational year for Viva Energy with the completion of the OTR acquisition and securing ACCC approval for the full acquisition of Liberty Convenience. These acquisition milestones are key to our growth strategy.

As Viva Energy continues to execute its growth strategy it is critical that we retain focus on and embed our sustainability priorities within our transformation program.

Viva Energy's core values of integrity, responsibility, curiosity, commitment and respect together with our Business Principles and Code of Conduct continue to guide the way we carry out our work and conduct our business activities. Our goals of prioritising sustainability, business integrity, transparency and promoting a safe and inclusive culture, based on our core values are enduring goals.

Viva Energy remains committed to the applicable United Nations Guiding Principles on Business and Human Rights across our operations and supply chains. Viva Energy has had in place a Human Rights Policy since 2020. In 2024, the Board approved a new Responsible Sourcing Policy and Supplier Code of Conduct to complement our Human Rights Policy and provide clear communication to all of our suppliers (including newer suppliers across our Convenience & Mobility business) on our responsible sourcing commitments, including our commitment to addressing modern slavery. During 2025 our Responsible Sourcing Policy and Supplier Code of Conduct will be further rolled out across our expanded supply chain.

In 2024 no incidents of modern slavery were reported or detected across our operations and supply chain. However, we recognise that the absence of reported incidents does not necessarily mean that modern slavery doesn't exist. As we grow and diversify, we will continue to play our part to identify key risk areas within our operations and supply chains and to prioritise and influence change in those areas.

If you have any questions or feedback on this statement, please do not hesitate to contact us via [www.vivaenergy.com.au](http://www.vivaenergy.com.au).

A handwritten signature in black ink, appearing to read 'S. Wyatt'.

**Scott Wyatt**  
Chief Executive Officer

30 May 2025



# 2024 highlights



## Furthered understanding of modern slavery risks across expanding Convenience & Mobility business

As part of our growth execution plans and aligned with our Enterprise Risk Management (ERM) framework we established a Retail Risk Register focused on Convenience & Mobility business risks assumed through recent acquisitions.

Our post-acquisition journey includes integrating systems and processes. This system and integration work will include rolling out the use of the Sedex® data platform across our goods for resale suppliers. Joining the Sedex platform will help us better identify high-risk suppliers and contexts within our retail business supply chains and then develop action plans to foster improvements.

## Building Culture and Awareness

We have continued the rollout of compulsory training and introduced modern slavery training within the OTR employee on-boarding program.

We have also introduced a new Responsible Sourcing Policy which will form the foundation of our responsible sourcing program.

## Continued to build on our collaborative partnerships

During 2024:

- we have renewed our long-standing sponsorship with Mission to Seafarers Melbourne.
- we continued our ongoing partnership with National Road Safety Partnership Program (NRSPP) where we are a founding partner and very proud of active commitment to improving road safety and driver well-being initiatives led by NRSPP since 2012.
- through our fuel supply arrangements with Vitol we continued to engage in the Voluntary Principles Initiative. This is a multi-stakeholder platform dedicated to sharing best practices and addressing complex security and human rights issues in respect of our security operations.
- we continued to work collaboratively with our customers for two-way sharing of knowledge and approaches to managing human rights issues across our operations and supply chains.

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# 90%

of senior leadership employees and those with sourcing responsibility carried out Modern Slavery training

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# 15+

Site visits to manufacturing facilities in China and fabrication yards in Thailand

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# 50

Engagement with customers on more than 50 Modern Slavery questionnaires

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# Reporting entities and requirements

## Reporting entities

This Modern Slavery Statement has been prepared in line with the requirements of the *Modern Slavery Act 2018* (Cth) (the Act) for the year 1 January 2024 to 31 December 2024.

The statement is a Joint Modern Slavery Statement (Joint Statement) covering the following entities, which are reporting entities under the Act:

Reporting entity	ACN
Viva Energy Group Limited	626 661 032
Viva Energy Holding Pty Ltd	167 883 525
Viva Energy Australia Group Pty Ltd	004 400 220
Viva Energy Australia Pty Ltd	004 610 459
Viva Energy Refining Pty Ltd	004 303 842
Viva Energy Aviation Pty Ltd	167 761 453
Liberty Oil Holdings Pty Ltd	068 080 124
Liberty Oil Australia Holdings Pty Ltd	107 226 880
Liberty Oil Corporation Pty Ltd	088 411 072
Liberty Oil Australia Pty Ltd	114 544 437
Viva Energy Polymers Holdings Pty Ltd	066 270 237
Viva Energy Polymers Pty Ltd	004 327 762
Viva Energy Retail Pty Ltd	662 372 027
OTR 330 Pty Ltd	638 301 649
Reliable Petroleum Pty Ltd	602 197 375
OTR Energy Pty Ltd	615 822 065
Viva Energy Retail SMGB Pty Ltd	670 895 904
On the Run Pty Ltd	638 356 466
Earthling Investments Pty Ltd	111 401 766
Mogas Regional Pty Ltd	111 402 110

In addition to the above entities, this Joint Statement has been made on behalf of all entities controlled by the above reporting entities (collectively referred to as Viva Energy).

## Modern Slavery Act reporting requirement

This statement addresses the mandatory criteria in the Act. The table below outlines the sections in which the items have been addressed in the Joint Statement.

Modern Slavery Act requirement	Section in Joint Statement	Page no.
1. Identify the reporting entity(ies)	Introduction	03
2. Describe the structure, operations and supply chains of the reporting entity	Section 2 – Our structure and organisation Section 3 – Our workforce and operations Section 4 – our supply chains	08 14 18
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities that the reporting entity owns or controls	Section 5 – Identifying, assessing and addressing our modern slavery risks	22
4. Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls to assess and address those risks, including due diligence and remediation processes	Section 5 – Identifying, assessing and addressing our modern slavery risks	22
5. Describe how the reporting entity assesses the effectiveness of these actions	Section 6 – Assessing effectiveness and looking forward	32
6. Describe the process of consultation with any entities that the reporting entity owns or controls	Section 7 – Consulting across our business –	36
7. Provide any other relevant information	The information in the Joint Statement directly addresses the first six criteria.	n/a

## Approval

This Joint Statement was approved by the Board of Viva Energy Group Limited (ACN 626 661 032) on its own behalf and on behalf of its wholly owned subsidiaries following review by the directors on 19 May 2025.

# 1.

## Sustainability and human rights governance and processes

### 1.1 Our policies and commitments

Viva Energy is committed to conducting its business in a way that contributes to sustainable development by respecting the human rights of all people, including our employees, the communities in which we operate, and customer and suppliers in our supply chain.

Viva Energy has in place the following policies which provide the basis of our approach to integrating sustainability into our business strategy and operations which includes protecting human rights and helping prevent modern slavery.

<b>Corporate Governance Statement</b>	Outlines Viva Energy Group's principal governance arrangements and practices ensuring stakeholders understand how Viva Energy is managed and demonstrates our commitment to ethical practices, good governance and provides insight into how Viva Energy's framework for managing risk and promoting sustainable growth.
<b>Viva Energy Values and Business Principles and Code of Conduct</b>	<p>Viva Energy has long-standing Business Principles that reflect our core values and guide the conduct and operations of our businesses. We also have a Code of Conduct, which outlines how we expect our employees, officers and Directors to behave and conduct themselves in the workplace. The Code of Conduct is designed to foster ethical and professional behaviour throughout Viva Energy to:</p> <ul style="list-style-type: none"><li>• promote a fair, safe and productive environment, and equal opportunity for all employees.</li><li>• ensure that Viva Energy complies with laws and regulations that apply to it</li><li>• ensure that there is an appropriate mechanism for employees to report conduct which breaches the Code of Conduct</li><li>• ensure that employees are aware of the consequences they face should they breach the Code of Conduct.</li></ul>
<b>Viva Energy Human Rights Policy</b>	<p>Viva Energy's Human Rights Policy outlines our commitment to respecting and promoting human rights across our operations and supply chains. Key commitments outlined in the policy:</p> <ul style="list-style-type: none"><li>• <b>Respect for Human Rights:</b> Viva Energy is committed to respecting the human rights of all people, including employees, communities, customers, and suppliers.</li><li>• <b>Non-Discrimination:</b> Viva Energy does not tolerate discrimination based on race, colour, religion, age, gender, sexual orientation, marital status, physical features, disability, ethnic origin, nationality, parental status, or any other unlawful grounds.</li><li>• <b>Safe Working Conditions:</b> We ensure safe working conditions and fair terms of employment for all employees.</li><li>• <b>Modern Slavery:</b> We implement procedures to identify, investigate, and take action against modern slavery, including human trafficking, forced labour, and child labour.</li><li>• <b>Community Engagement:</b> We manage the social impacts of business activities and work to enhance benefits to local communities.</li></ul>



<b>Viva Energy Responsible Sourcing Policy and Supplier Code of Conduct</b>	Viva Energy acknowledges the importance of conducting business with partners who share the same values as our own, and we recognise our risk profile evolves as our business evolves. During the reporting period, the Board approved the Responsible Sourcing Policy and Supplier Code of Conduct which confirms the commitments of Viva Energy across key areas of Business Integrity, health, safety, security and environment (HSSE), Respect for People, Community and First Nations, Product Safety & Quality and Sustainability. We seek to engage with suppliers who demonstrate similar commitments and can help us promote the conduct of our business as responsible members of society.
<b>Inclusion and Diversity Policy</b>	We value inclusion and diversity and the benefits they bring to Viva Energy. Viva Energy believes that genuine diversity of skills, backgrounds and experiences drives strategic advantage, creates opportunities for innovation and contributes to the achievement of our corporate objectives. During 2024, the Board reviewed the Inclusion and Diversity Policy. In support of the commitments set out in the policy, Viva Energy developed diversity action plans targeting gender as well as other areas of diversity to assist in meeting our objectives.
<b>Sustainability Committee Charter</b>	<p>The Sustainability Committee assists the Board in receiving information and undertaking reasonable steps to oversee the:</p> <ul style="list-style-type: none"> <li>• integrity, effectiveness and performance of Viva Energy's health, safety, security, environment (HSSE), community, product quality and sustainability (together, HSSEC) functions (including greenhouse gas emissions); and</li> <li>• systems for compliance with legal and regulatory HSSEC requirements.</li> </ul>
<b>HSSE Policy</b>	Outlines our commitment to conducting our operations safely and responsibly, including our Goal Zero; aim for zero harm to people and zero environmental incidents.
<b>Enterprise Risk Management (ERM) framework</b>	Risk management is fundamental to the success of Viva Energy. Viva Energy has adopted an ERM framework supported by appropriate risk management policies and procedures, designed to assess, monitor and manage risk and, where appropriate, keep relevant stakeholders informed of material changes to Viva Energy's risk profile.
<b>Community Program</b>	<p>Viva Energy has in place a long-standing community program designed to positively impact the communities where we operate. We partner with a range of organisations that work to improve access to community services, and enhance First Nations employment. Through local programs, our goal is to create a positive impact on the communities we work in.</p> <p>Organisations that we sponsor often have programs that target protecting vulnerable workers from situations that could lead to modern slavery such as Mission to Seafarers – Victoria branch.</p>
<b>RAP</b>	<p>Our vision for reconciliation is a nation where Aboriginal and Torres Strait Islander peoples have equal and equitable opportunities and that our business visibly reflects this aspiration and is enriched by First Nations cultural diversity.</p> <p>Our third successive Innovate RAP, provides us with the opportunity for our reconciliation program to be incorporated into our new Convenience &amp; Mobility business, which has a substantial national footprint, and an additional 13,500 team members.</p>

# 1. Sustainability and human rights governance and processes continued

## 1.2 Our governance framework

The Board of Viva Energy Group Limited has oversight of sustainability matters, including how sustainability is integrated into corporate strategy and risk management systems.

Our sustainability approach is primarily overseen by the Board’s Committees, including the Board Sustainability Committee, Audit and Risk Committee (ARC), and Strategy and Investment Committee (SIC).

The Board Sustainability Committee is responsible for reviewing the Group’s sustainability performance, including compliance and disclosures relating to Health, Safety, Security, the Environment and Community (HSSEC) matters. The Board Sustainability Committee met 5 times during 2024.

The Board ARC oversees the implementation and operation of the Group’s Risk Management Framework and Risk Registers. The ARC met six times during 2024.

The Board SIC oversees the Group strategy and strategic investment decisions. The SIC met 4 times during 2024.

The specific duties of the Board and its Committees are set out in its charters, available at [vivaenergy.com.au/our-company/corporate-governance](http://vivaenergy.com.au/our-company/corporate-governance).

The oversight and risk management required to deliver on our strategy and sustainability objectives is covered at management level by the Executive Leadership Team (ELT) and various Management Committees.

At a management level, we have multiple formally established management committees comprising of ELT members, other senior management and subject matter experts. These committees are organised by business unit, and cover a wide range of sustainability matters, including climate and emissions reduction, HSSEC, people and security which includes modern slavery risks inherent to each business units supply chains and operations.

The ARC management committee also plays a role in the management of risks, including climate-related risks.

Various internal functions are responsible for the day-to-day management of sustainability and climate related risks and opportunities. These functions include both customer-facing, operational and strategically focused teams including Strategy, Sustainability and Carbon Management, Carbon Solutions, HSSE, Legal, Future Fuels, and Supply and Technical teams.

The Modern Slavery Committee is a cross-functional and cross business representative working group. This committee focuses on identifying, preventing and addressing modern slavery and shares insights, challenges, to align efforts to address modern slavery as relevant to each business lines’ operations and supply chains.



The outcomes of the Modern Slavery Committee’s work are reported back to the management committees and the Board Audit and Risk Committee (ARC).



### 1.3 Integrated approach to identify, prevent and address modern slavery risks

Viva Energy combines various strategies and practices across our operations and supply chains which are integrated into our wider business processes to manage modern slavery risks. These are summarised below.

<b>Policy settings</b>	<p>Viva Energy has group wide policies in place that clearly outline Viva Energy's commitment to preventing modern slavery and safeguarding human rights and communicate our expectations of suppliers. These are described in section 1.1 above.</p> <p>These policies are incorporated into on-boarding processes for supply chain partners and in our standard contract documents to give them contractual force.</p>
<b>Risk assessment and due diligence</b>	<p>As part of our ERM framework we:</p> <ul style="list-style-type: none"><li>• conduct risk assessments to identify areas where modern slavery risks are most prevalent; and</li><li>• carry out targeted evaluations across supply chains in collaboration with business partners and within priority geographic regions.</li></ul>
<b>Training and Awareness</b>	<p>Provide training for employees and other targeted business partners to recognise the signs of modern slavery and understand policies and procedures for addressing it.</p>
<b>Monitoring and auditing</b>	<p>Implement monitoring and auditing processes to ensure compliance with anti-slavery policies. This may include on-site inspections, third-party audits, and worker interviews.</p>
<b>Collaboration and partnerships</b>	<p>Work with other organisations, industry groups to share best practices and collaborate on initiatives to combat modern slavery.</p>
<b>Reporting and transparency</b>	<p>Maintain transparency by reporting on efforts to address modern slavery in our annual reporting suite. This helps build trust with stakeholders and demonstrates the organisation's commitment to ethical practices.</p>



# 2.

## Our structure and organisation

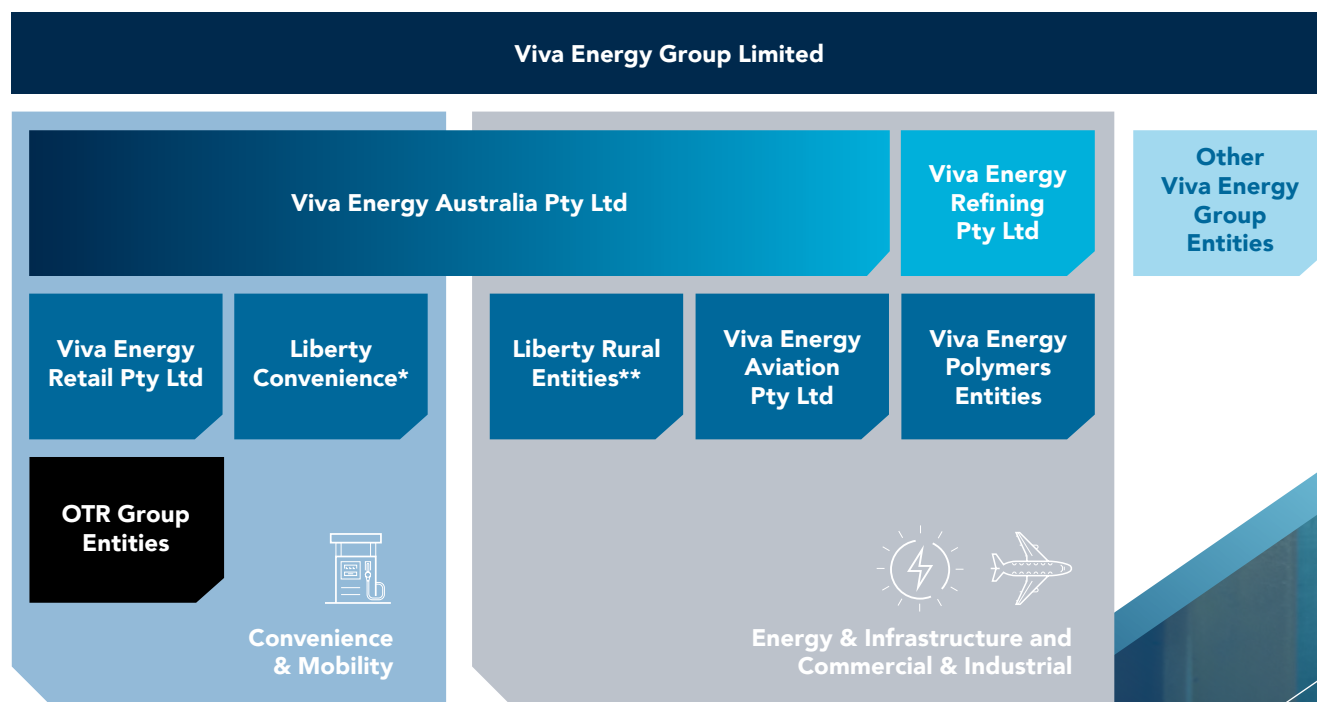
### 2.1 Structure

Viva Energy Group Limited is a company incorporated in Australia whose shares are publicly traded on the Australian Securities Exchange (ASX: VEA).

The headquarters of Viva Energy Group Limited is located in Melbourne, at Level 16, 720 Bourke Street, Docklands, VIC 3008. The registered office of all reporting entities covered by this Joint Statement is located in Melbourne, at Level 16, 720 Bourke Street, Docklands, VIC 3008.

Viva Energy Group Limited is the parent company of the group, which includes the reporting entities listed on page 03 of this Statement and other controlled entities. A full list of the controlled entities is included at Note 27(b) to the consolidated financial statements within Viva Energy's 2024 Annual Report.

### 2.2 Simplified organisational structure



Notes:

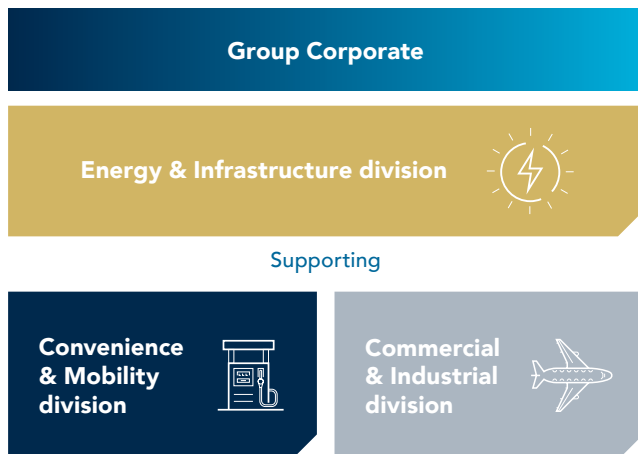
\* Acquisition of the Liberty Convenience business completed on 31 March 2025.

\*\* Includes Mogas regional business



## 2.3 Business lines

Viva Energy is organised around three distinct business lines:



Each business line is overseen and governed under the governance framework described in Section 1 of this Joint Statement. The Energy & Infrastructure (E&I) business which consists of a nationwide network of fuel and supply chain infrastructure including the Viva Energy Hub in Geelong supports the two customer facing business lines. The Convenience & Mobility (C&M) business is supported by a network of more than 1,000 stores. Viva Energy has a group-wide workforce of over 15,000 people.

## 2.4 Energy & Infrastructure

Viva Energy operates the Geelong Refinery, one of Australia's two remaining refineries. This facility has been a crucial part of Victoria's and Australia's economy since 1954, processing up to 120,000 barrels of oil per day. It produces a variety of fuels, including petrol, diesel, LPG, jet fuel, and avgas, as well as specialty products like hydrocarbon solvents, bitumen, and high-quality plastic feedstock. In addition to refining, Viva Energy is also involved in polymer production through its polymers processing facility also located at the Viva Energy Hub in Geelong where Viva Energy, manufactures polypropylene resins from propylene feedstock. Viva Energy is the sole manufacturer of polypropylene in Australia and a major importer of polyolefins. Viva Energy's polymer products are used in a wide range of applications, including packaging films, non-woven fibres, houseware, and industrial sheeting.

The Viva Energy Hub in Geelong employs around 1,000 people and supplies over 50% of Victoria's and 10% of Australia's fuel requirements.

The broader Viva Energy Hub in Geelong brings together diverse projects to support the evolving energy needs of Victoria and south-eastern Australia including in 2024 the trial production of bio-based polymers using used cooking oil as a feedstock to create food-grade plastic packaging, demonstrating Viva Energy's commitment to creating sustainable and circular economy solutions.

Our Energy & Infrastructure business extends beyond the Viva Energy Hub in Geelong and includes an extensive nationwide network of import terminals and other terminals, distribution facilities, pipelines, depots, logistics solutions and supply chain systems for storage, shipping and distribution of our products across our retail network and to our customers.

The Energy & Infrastructure supply chains apply to all reporting entities covered by this Joint Statement.



## 2. Our structure and organisation continued

### 2.5 Commercial & Industrial

Our Commercial & Industrial business is made up of a number of diverse business streams to service all parts of the commercial hydrocarbon value chain.



#### Aviation

We have presence at around 90 airports and airfields, including all major airports, and a supply chain capable of delivering to customers of any size. We manufacture jet fuel at our Geelong Refinery, and we are the only manufacturer of Aviation Gasoline (Avgas) in Australia.



#### Resources

We supply bulk fuel, oils and greases, coolant and detergent products to the resources sector. Our supply chain reaches all major mining regions in Australia, ensuring continuous supply for all customers. Our team of Lubricant Engineers and Technicians work directly with customers to optimise equipment performance and drive continuous improvement.



#### Marine

Viva Energy is Australia's leading supplier of marine fuels, offering both residual and distillate fuel grades. Our extensive network of marine refuelling facilities and operations across Australia includes barges, pipelines, and truck delivery options, ensuring comprehensive bunkering solutions for our customers.



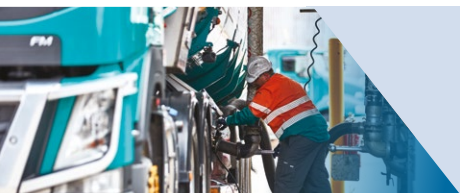
#### Defence

Our expert team delivers products and services that support and enable numerous critical Defence activities across Australia and its territories. We supply a wide range of commercial and military specification products, specialist technical advice, product quality guidance and asset management and maintenance services to the Defence sector.



#### Transport

We support the transport sector with our bulk fuel supply, Shell Card access at over 1,500 retail sites nationwide, AdBlue delivery, and a national lubricants supply chain. With one of Australia's largest technical teams, we partner with customers to optimize fuel use and meet their fleet and rail needs.



#### Wholesale

Our wholesale business covers agriculture, transport, construction and retail segments. Our national scale in bulk fuel delivery allows us to provide competitively priced options that are tailored to meet our customers' specific needs.



#### Liberty Rural

The Liberty Rural business extends our capability to supply rural and regional customers with high quality fuels, oils and greases. Liberty Rural distributes more than 2 billion litres a year through our mainland terminals and depot facilities around Australia, making us one of the country's largest wholesaler operators.



#### Specialties (including bitumen, polymers, chemicals and lubricants)

We are the only manufacturer of bitumen, polypropylene, hydrocarbon solvents and low aromatic fuel in Australia. We are the country's major importer of polyolefins and solutions and the exclusive supplier of Shell oil and grease products in Australia.



## 2.6 Convenience & Mobility

Our Convenience & Mobility network (which includes the OTR Group, acquired in 2024) is the largest convenience retailer in the country. We have over 1,000 stores across Australia, with a wide-range convenience offer, including the integration of quick-service restaurants. This puts us in a strong position to grow in the rapidly growing retail and convenience segment.

Our brands are:

<b>Convenience</b>	With over 1,000 convenience stores across the country, we are the one-stop shop for our customers to stock upon a wider range of food and other convenience items. Our brands across OTR, Reddy Express, independently owned Shell and Liberty Convenience sites ensure that every customer can have access to premium grade fuel and convenience items in every corner of our country.
<b>SmokeMart and GiftBox (SMGB)</b>	Our SMGB stores offer a wide range of gifts and accessories, including home and outdoor wares, games, lighting and tech and gadgets.
<b>Quick-Service Restaurants</b>	By incorporating quick-service restaurants (QSRs), our convenience retail offering provides a diverse selection of food choices to cater to the constantly changing preferences of our customers. We have licensing agreements with Guzman y Gomez, Hungry Jack's, Subway, Oporto, Wok in a Box and Krispy Kreme. Additionally, our own brands include Moe's, Happy Wash and more.



## 2. Our structure and organisation continued

### 2.7 Our locations



#### Energy & Infrastructure network (location names shown)

- ▲ Geelong Refinery
- Bitumen facility
- Terminals (leasehold and freehold)
- JV terminal
- Third-party terminal (VEA operated)
- Third-party terminal (not VEA operated)
- ◆ Inland depots
- ◆ Third-party depot (VEA operated)

#### Commercial & Industrial

- ★ Major airport presence
- ★ Regional airport presence
- Liberty rural depot

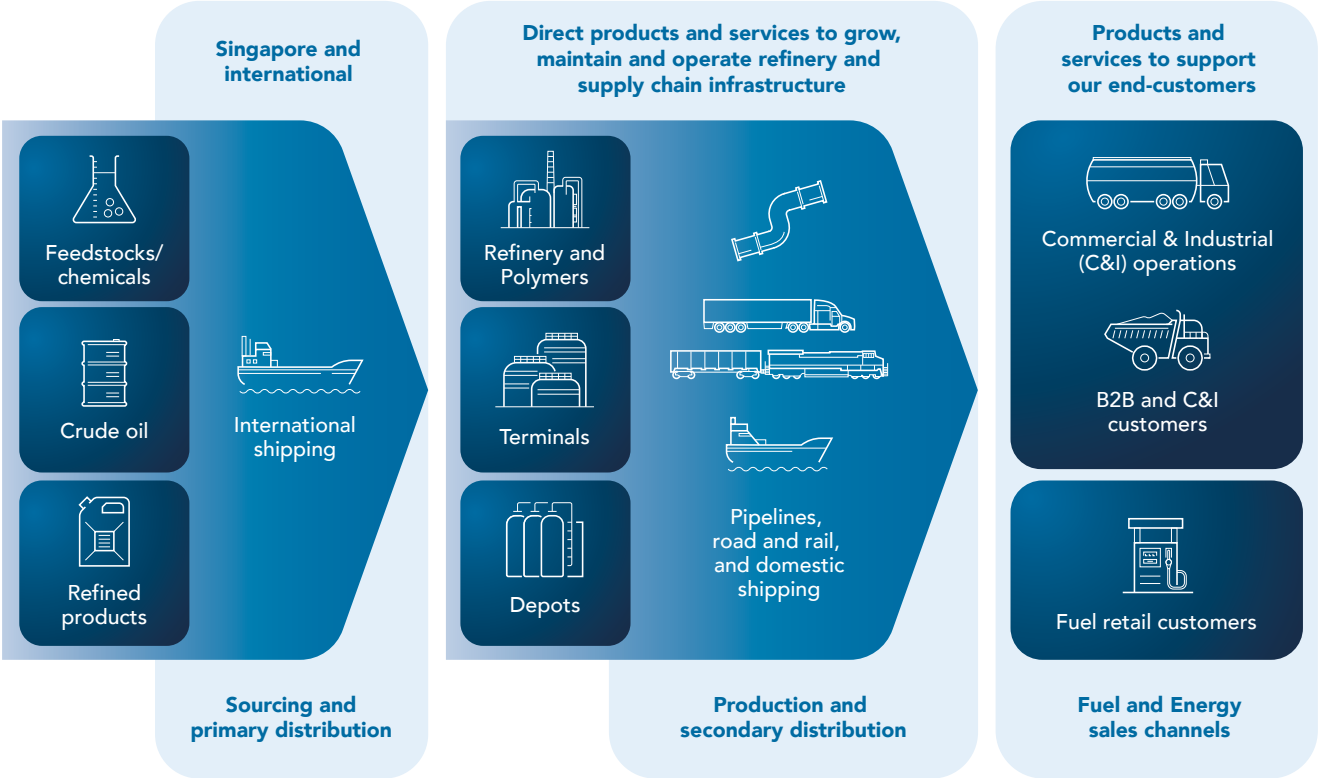
#### Convenience & Mobility – fuel & convenience network<sup>1</sup>

	214 total
	676 total
	110 total

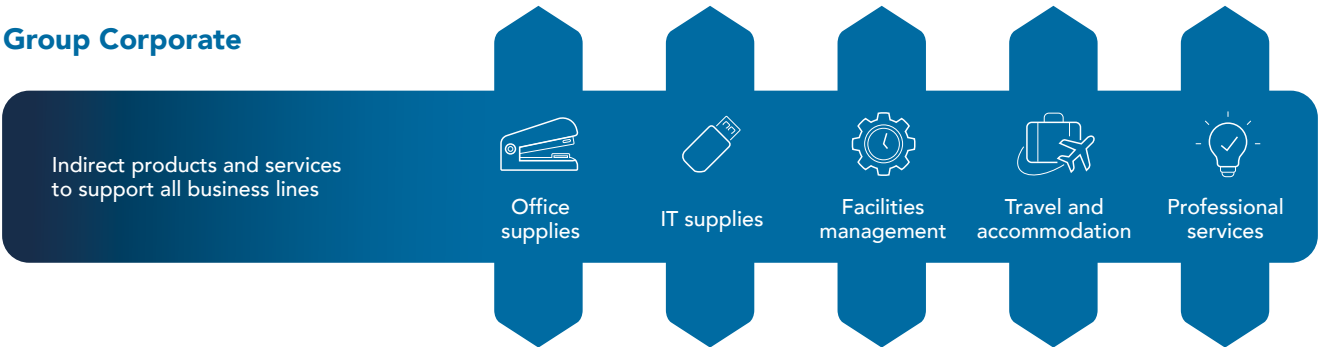
1. As at 31 December 2024.

2.8 Our primary activities across business lines

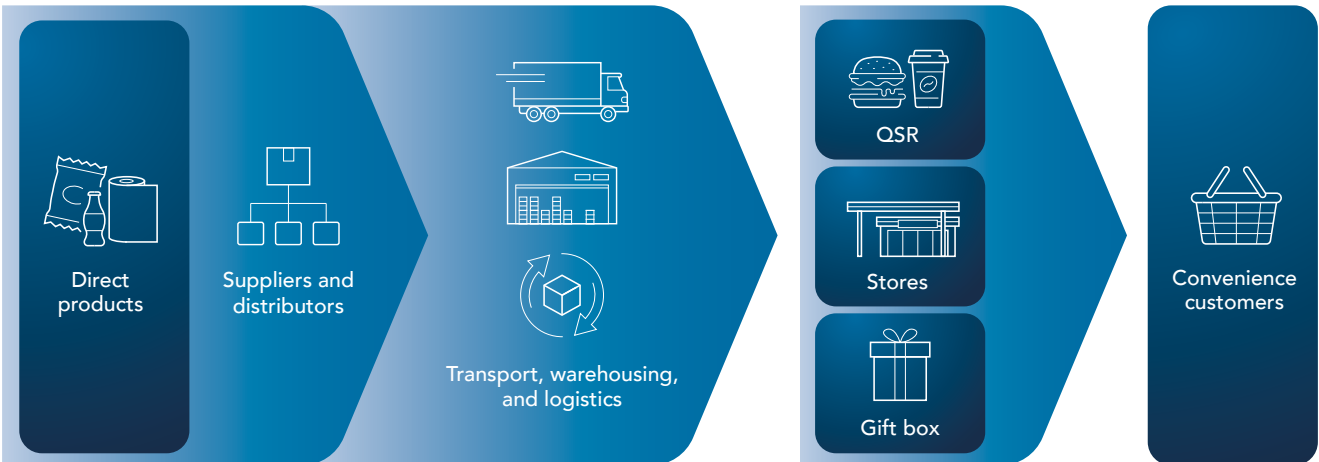
Energy & Infrastructure supply chain



Group Corporate



Convenience supply chain





# 3.

## Our workforce and operations

### 3.1 General

The Viva Energy group comprises more than 15,000 team members based in our State offices and on-site. Viva Energy has two employees based in Singapore, with the rest of Viva Energy's workforce based in Australia. In relation to Viva Energy's workforce, 34% are based in regional locations.

All of Viva Energy's workforce are provided with robust on boarding, induction and training to build their knowledge and understanding of Viva Energy's Code of Conduct, values and standards of behaviour, together with all policies and procedures relevant to their role and work site. This provides team members with the tools needed to maintain and uphold Viva Energy culture and values, including support to identify modern slavery risks and noncompliance.

### 3.2 Across business lines

Composition of our Viva Energy workforce across our business lines as at 31 December 2024 is as follows:

#### Commercial & Industrial and Energy & Infrastructure (combined)

Terms of Employment	EBA	Salaried	Total
Full-time	513	1,262	1,775
Part-time	39	107	146
Casual	27	29	56
<b>Total</b>	<b>579</b>	<b>1,398</b>	<b>1,977</b>

### Convenience & Mobility

Terms of Employment	Site Operations	Store Support	Total
Full-time	2,091	660	2,751
Part-time	5,672	18	5,690
Casual	4,296	8	4,304
<b>Total</b>	<b>12,059</b>	<b>686</b>	<b>12,745</b>

Contract/Industrial Instrument	Site Operations	Store Support	Total
Award (FT/PT)	3,502	35	3,537
Casual EBA	376	0	376
Common Law (FT/PT)	2,051	643	2,694
EBA (FT/PT)	2,212	0	2,212
Award Casual	3,918	8	3,926
<b>Total</b>	<b>12,059</b>	<b>686</b>	<b>12,745</b>

### 3.3 Locations

Our operated assets are entirely in Australia. In addition, Viva Energy's employees are predominantly skilled workers engaged in Australia. More specifically:

- Our office-based employees work from offices located across most capital cities in Australia, with our OTR Group located at the head office based in Adelaide
- Apart from our two Singapore based employees, our teams work in sites across Australia, with capital city, regional and remote sites that draw on and provide employment opportunities to local community populations.
- Employees are employed into roles requiring varying levels of experience, the employees are supported by competency based on the job training provided by Viva Energy, or via third party contracting companies that require contracted employees to abide by the Code of Conduct and induction processes.



### 3.4 Our overall approach to fostering a positive workforce culture

Our people drive our success, and our ability to attract, motivate and develop great people is critical to the success of our business. As an employee at Viva Energy, you belong to an amazing team of people who are committed to fostering a positive workforce culture, who embody the values of our business, and represent the diversity of the communities in which we operate.

In 2024 we continued our focus on positioning Viva Energy as an employer of choice for gender equality, developing our future leaders and continuing to drive high levels of employee engagement, inclusion, belonging and respect.

We recognise that by empowering individuals and groups that are vulnerable to modern slavery we can play a key role in combating the drivers of modern slavery crimes. At Viva Energy, our aim is that everyone, every day feels respected and valued. Everyone has a part to play in actively and intentionally recognising diversity and behaving with inclusion in mind. We continue to deliver on our Inclusion and Diversity plan, with each of our pillars contributing.

We have seen a significant transformation of our workforce with the inclusion of the OTR group and our numbers increasing to around 15,000 team members. Our business has an exciting outlook ahead as we continue to grow and transform. Diversity, inclusion and empowerment are crucial strategies in the fight against modern slavery. Providing economic opportunities and support to vulnerable populations reduces the risk of exploitation. Similarly investing in training staff on diversity, inclusions and empowerment principles helps our staff recognise and resist exploitative practices.

An inclusive culture will be essential in the success of our strategy and will continue to play a part in ensuring our people are highly engaged throughout the transition as we work to bring the team together.

					
GENDER	FIRST NATIONS PEOPLES	PRIDE	CULTURE	FAMILY	ABILITIES
Striving for a gender balanced workforce to benefit from diversity of thought, productivity and engagement	Celebrating First Nations cultures, promoting reconciliation, building respect and increasing employment opportunities	Empowering everyone to bring their full self to work while building understanding, respect and allyship	Igniting the conversation on, and celebrating, our cultural diversity	Supporting our people, at different life stages and with diverse caring responsibilities, to thrive	Embracing inclusion opportunities for neurodiverse people and for people with a physical disability

## 3. Our workforce and operations continued

### 3.5 Our employment frameworks

As stated above, except for two employees based in Singapore all of Viva Energy's workforce is based in Australia. Accordingly, the National Employment Standards and associated frameworks that regulate conditions of employment in Australia together with industry-specific industry employment frameworks and conditions governed by modern awards and enterprise agreements provide robust safeguards against modern slavery practices occurring in Viva Energy's operations.

Viva Energy takes the following steps to manage its workforce through its operations:

- Our recruitment process captures both age and eligibility to work to ensure we are meeting the 'minimum age for admission to employment' requirements.
- Expected workplace behaviours are covered in our induction for new employees, where they learn about our values and expected Viva Energy behaviours, as set out in the Code of Conduct.
- All employees and contractors must confirm their understanding of the Code of Conduct at least once every two years, including the addition of the 'Guide to the Code of Conduct' to be rolled out in 2025 to further support our teams understanding and application.
- All employees must complete mandatory training on anti-bribery and anti-corruption, equal employment opportunity and workplace health and safety once every two years.
- Modern Slavery training is also provided to senior leaders and assigned to specific roles within the organisation.
- Proactive engagement of our team on the respect@work reforms with our respect@viva training continuing throughout 2024, and into 2025.

### 3.6 Our payroll processes

Viva Energy has an extensive payroll function which provides compliant and timely remuneration and payment processes in accordance with legislation and industrial instruments provided under Federal and State law, our individual contracts of employment and our policies and procedures.

Viva Energy's payroll processes are subject to review on a weekly basis and independent third-party audits occur on a biannual or more frequent basis.

For Viva Energy's payroll function to lawfully and accurately compensate and support its team members, it has in place various operational, and other systems and processes designed to capture and manage team member time and output, including rostering or resource allocation systems and time-keeping systems. Similarly, Viva Energy ensures that there is regular and systematic training (and re-training) of team members and managers to ensure sound decision-making and execution of timekeeping, rostering, leave management, allowance and expense approval, and other processes supporting team member's remuneration and benefits.

### 3.7 Our health and wellbeing culture

Viva Energy ensures key team members in its Safety, Health, People & Culture and Legal divisions maintain up to date knowledge of employment and industrial laws relating to working hours and fatigue management. This knowledge is then applied to monitor, assess and promote team member health and safety in compliance with legislation and best industry practice. Viva Energy's robust Health, Safety, Security and Environment Policy and management systems provide further support and monitoring of its operational risks.

### 3.8 Our screening and on-boarding processes

Before commencement of a team member's employment, a comprehensive right to work check is completed, inclusive of regular Visa Entitlement Verification Online (VEVO) system checks for all relevant team members.

During the on-boarding process all team members are provided with:

- Fair Work Information Statement, with team members employed on a casual basis additionally being provided with the Casual Employment Information Statement (CEIS) outlining the information about their conditions of employment and their rights;
- Copies of relevant policies and procedures, including at minimum:
  - Business Principles and Code of Conduct
  - Guide to Standards of Behaviour
  - Competition and Consumer Act Guidelines
  - Securities Trading Policy
  - Disclosure Policy
  - Anti-bribery and Corruption Policy
  - Whistleblower Policy

In addition to setting out our expectations of employees, these policies provide information regarding a number of support mechanisms in place for team members who require assistance, including:

- Viva Energy Australia Grievance Policy
- Confidential 24/7 Stop Line (whistleblower reporting service)
- Confidential 24/7 Respect@Viva Line
- Confidential 24/7 EAP services
- People Queries inbox monitored during business hours
- Access to assigned members of the People & Culture team during business hours



### 3.9 Our focus on Convenience & Mobility workforce

As part of the acquisition of the OTR business and further to our acquisition of Reddy Express business in 2023, Viva Energy has undertaken several initiatives to:

- onboard and integrate new OTR team members into our wider Viva Energy corporate culture; and
- enhance and transform our workforce management processes and practices to support our expanded retail workforce.

This work has included moving all Convenience & Mobility employees to a new single human resources management system covering workforce payroll, onboarding, employee benefits, recruitment and labour compliance to enable:

- technology-driven recruitment and onboarding which enhances process rigor, ensures consistent pre-employment checks, and standardises recruitment, screening, and data management.

- transitioning Reddy Express and OTR payroll to a single consolidated platform (due to complete in mid-2025) establishing rigorous checks and balances that specifically accounts for Convenience & Mobility workforce complexity and regulatory requirements.
- policy harmonisation and alignment of corporate culture across the Convenience & Mobility businesses, with a strong focus on enhancing our Employee Value Proposition (EVP).

These initiatives are crucial for our transformation, helping us establish solid systems and foundations and ensure a fair, safe work environment for our team members. This work will be ongoing in 2025.



# 4.

## Our supply chains

### 4.1 General

Viva Energy has robust and extensive supply chains to ensure we can support our operations and continue to deliver the products and services that our customers expect. We partner with our suppliers and share and set expectations of our counterparties across key areas of human rights, addressing modern slavery risks, responsible sourcing, health and safety, security, environment and sustainability and compliance with laws within our supply chain.

Viva Energy's supply chains include direct products and services to customers and indirect products and services that support our operations.

Our Energy & Infrastructure supply chain serves both the C&I and C&M business lines. Additionally:

- the C&I business has its own specific supply chain to support its B2B customers; and
- the C&M business has its own supply chains specific to the direct convenience products and services delivered to customers.

### 4.2 Energy & Infrastructure supply chain

Our E&I supply chain starts with the procurement of hydrocarbon products (crude oil and other feedstocks, refinery catalysts, chemicals and gases for processing and refining products for storage and distribution). These products are sourced domestically and overseas and then either:

- shipped to our Geelong refinery for processing;
- shipped to our terminals or other infrastructure assets for storage, further handling and for distribution to our customers; or
- bulk shipped or distributed directly to our business customers.

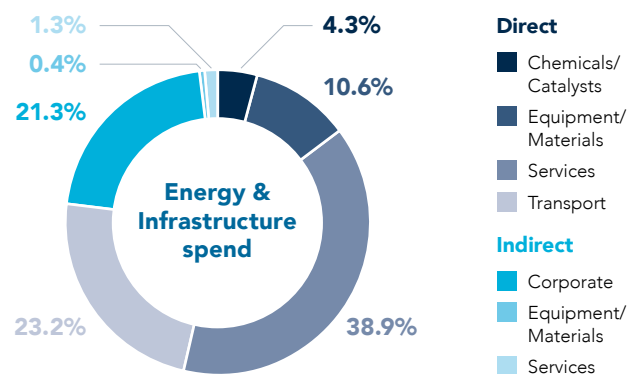
Distribution to our customers occurs through our secondary and tertiary distribution channels, namely to:

- commercial end customers via pipelines, shipping and trucking (including customer pick-up at our terminals, warehouses and depots and into-plane deliveries at our airports); and
- retail customers across our retail network.

The distribution leg of our E&I supply chain includes the engagement of logistics providers to help store, ship and truck our products.

Our E&I supply chain also includes the sourcing of inputs used for processing our products and to run and operate our infrastructure assets together with the purchasing of components, materials and services to grow, improve and maintain our infrastructure. This includes the procurement of building products and services, engagement of specialist construction contractors such as mechanical and electrical services, structural and piping services, engineering services, associated IT infrastructure, safety and security services and waste management and environmental services providers.

The table below details the most material categories of third party spend incurred across Viva Energy's E&I operations in 2024.



#### Direct goods and services for the manufacture, processing and delivery of our products

- Crude oil, other feedstock and refined product supply
- Fuel shipping (including freight management and import/export services)
- Biofuels supply
- Industrial gasses
- Road and rail transport services
- Chemicals and catalysts supply
- Electricity, gas and water
- Engineering, technical, maintenance, repair and construction services necessary for processing and supply chain infrastructure operations
- Components, parts, equipment and tools

#### Indirect goods and services to support infrastructure, operations and the workforce

- Facilities services
- Contingent labour and employee training services
- Consulting services
- Personal protective equipment and uniforms
- Business administration, office services including cleaning and catering
- IT equipment and services
- Utilities

### 4.3 Commercial & Industrial supply chain

The Energy & Infrastructure supply chain serves the Commercial & Industrial business. In addition the Commercial & Industrial business has its own specific supply chain to support its B2B customer offering to Aviation, Lubricants Defence/Marine and Liberty Rural customers.

Types of goods and services procured across each of these sectors specific to the C&I business include:

#### Aviation

- Into-Plane refuelling services
- Airport agency operations services
- Airport maintenance services

#### Lubricants

- Chemicals and products for resale to B2B customers
- Warehousing and logistics services
- Transport services
- Packing services

#### Polymers

- Export and freight forwarding services

#### Defence/ Marine

- Fuel bunkering services
- International refuelling services

#### Future Fuels

- HVO
- Used Cooking Oil
- Circular economy feedstocks

### 4.4 Convenience & Mobility supply chain

The Energy & Infrastructure supply chain services the Convenience & Mobility business's supply of fuel products across our extensive service station network. In addition, the Convenience & Mobility business has its own specific supply chain to support its extensive non-fuel retail offerings including quick serve restaurants and other convenience offerings.

Categories of third party spend is broken down into direct goods for resale and indirect goods and services not for resale. Types of goods and services across these categories include:

#### Direct:

**Goods for resale – i.e. products that are directly sourced from suppliers for resale in our retail stores to our customers**

#### Grocery items

Confectionery, soft drinks, milk, bread, gums and mints, ice-cream and snacks

#### Readymade food and beverage

Coffee, sandwiches, baked goods, frozen goods, carbonated beverages and fast food.

#### Household items

Toilet paper, sunscreen, cleaning and hygiene products

#### Toys and accessories

Promotional toys, gifts, hats and sunglasses

#### Tobacco

Cigarettes, packaged tobacco and smoking accessories

#### Indirect:

**Goods and services not for resale items that we purchase to support the operation and running of our Convenience & Mobility business which are not offered up for resale directly to our customers**

#### Store Operations

Uniforms, maintenance services, waste services, security and store supplies

#### Energy

Gas and electricity, energy consulting and services

#### Marketing

Creative, media, print and promotional materials

#### Capital

Store infrastructure, project management services and building supplies

#### Technology

Hardware, software and IT-related services

#### Supply chain

Transport, warehousing and other logistics services

#### Packaging

Paper food bags, coffee cups, lids and trays

#### Property

In-store maintenance, property development and leasing



## 4. Our supply chains continued

### 4.4 Convenience & Mobility supply chain continued

Viva Energy's goods for resale products supplied through our convenience stores are purchased via the following supply scenarios:

1. Own branded contract manufacturing.
2. Products directly sourced from factories (Direct to store) and manufacturing partners.
3. Products sourced from trade partners who source from factories and manufacturers.
4. Products sourced through our franchisors for sale across our quick service restaurants.

Behind the arrangements Viva Energy's Convenience & Mobility business has with its direct suppliers, we understand there may be multiple supply chain layers that Viva Energy is exposed to. This may include the procurement of raw materials for manufacturing or engagement of secondary suppliers by our direct suppliers to provide goods or perform a service to them. Therefore, Viva Energy's approach to managing risks involves setting expectations not just on the behaviour of direct suppliers but also their secondary suppliers.

### 4.5 Composition of suppliers

Excluding suppliers of crude oil and fuel products, chemicals/catalysts and shipping services, the composition of Viva Energy's suppliers for 2024 is set out below:

413,000+

different goods  
and services are  
procured annually

4,000+

suppliers of different  
goods and services

95%

procurement  
conducted with  
Australian based  
entities

30

countries where our  
Tier 1 suppliers are based  
with the largest being:

- Australia (98% of spend)





## 4.6 Tiers of suppliers

In a business such as Viva Energy we have an extensive list of suppliers who either provide goods and services directly or who are sub-contracted by our suppliers. The onus remains on us to perform due-diligence and understand where the major risk areas are. For us to be able to holistically view our supply chain and commence performing our risk management approach, Viva Energy identifies and appropriately segments our supplier-base into Tier 1 or Tier 2 suppliers.

Our exposure to modern slavery increases when we incorporate Tier 2 suppliers. Accordingly, in order to gain a line of sight into our Tier 2 suppliers we must ensure our Tier 1 suppliers have adequate processes and policies in place to aid in monitoring the risk in the Tier 2 supplier-network. Leveraging Sedex database and insights will assist Viva Energy develop a deeper understanding of our Tier 2 supplier network.





# 5.

## Identifying, assessing and addressing our modern slavery risks

### 5.1 Risks of modern slavery practices

The work undertaken as described in Viva Energy's previous modern slavery statements enabled Viva Energy to conduct comprehensive mapping of our supply chain and operations to identify areas with the highest risk of modern slavery and to obtain a level of confidence that our overall modern slavery risk is low. Consistent with this conclusion, in 2024, Viva Energy did not identify any actual instances or allegations of modern slavery within the direct operations of Viva Energy, and we did not become aware of any modern slavery allegations against any supplier.

However, we are keenly aware that our business is transforming and our supply chains and operations are growing and changing, particularly within our Convenience & Mobility business. Accordingly, in 2024 Viva Energy dedicated additional resources and effort toward better understanding the nature and scale of the modern slavery risks inherent in our newly acquired Convenience & Mobility business operations and supply chains. This work was done while maintaining focus on known and emerging modern slavery risks within our E&I and C&I supply chains.

### 5.2 Integrated and targeted risk-based approach

Viva Energy adopts an integrated and holistic risk-based approach to identify and assess its modern slavery risks. This is done as part of Viva Energy's wider Corporate Risk Management Framework and forms part of Viva Energy's wider Sustainability Commitment.

To ensure actions taken by Viva Energy to address modern slavery risks are meaningful and effective Viva Energy takes a targeted approach to prioritise and address those modern slavery risks within vulnerable categories of work. This approach ensures our plans and actions in this space focus on the risks that pose the greatest harm to people (i.e. 'salient risks').

The sections below provide information on:

- the risk assessment undertaken across each of our business units;
- vulnerable categories of work identified; and
- targeted actions Viva Energy is taking to address those vulnerable categories of work.

Importantly, the targeted actions taken by Viva Energy are in addition to the foundational actions and controls Viva Energy maintains and monitors in respect of modern slavery risks as described in our previous modern slavery statements, namely:

Aspect	Controls
✓ Policies and procedures	Having in place meaningful policies and supporting procedures that confirm our commitment to protecting human rights and set standards and expectations for ourselves and stakeholders to play our part to identify and mitigate the risks of modern slavery in our operations and supply chains
✓ Risk Assessments	Regularly carrying out risk assessments and mapping to identify areas where modern slavery risks are most prevalent across our supply and operations
✓ Due Diligence and supplier relationship management	Implementing due diligence processes to evaluate and monitor suppliers and business partners for compliance
✓ Training and Awareness	Carrying out training and awareness for employees to recognise the signs of modern slavery and understand their roles in preventing it.
✓ Consultation and collaboration	Having in place a cross-functional and cross-business line Modern Slavery Committee
✓ Reporting	Establishing clear reporting mechanisms for employees and stakeholders to report modern slavery concerns





### 5.3 Risk assessments across Energy & Infrastructure and Commercial & Industrial businesses

Viva Energy uses a combination of supply chain mapping, traceability, risk indicators such as country risk, sector risk, supplier risk and resources like the Global Slavery Index and industry reports to inform our risk assessment.

Across our E&I and C&I businesses, the vast majority of Viva Energy's suppliers possess one or a combination of the following features:

- They are located and operate within Australia with no or minimal foreign connection. In 2024, excluding foreign oil companies engaged through our arrangements with Vitol, approximately 95% of our direct suppliers by number and 98% by value were located in Australia.
- They supply equipment, materials or other inputs that are technically difficult to produce and therefore more likely to require skilled labour working in mature and sophisticated facilities reducing supplier modern slavery risks.
- They operate in industries which are subject to significant regulation with strong employee protection mechanisms.

- In the case of the procurement of crude oil and other hydrocarbon products, our supply chain includes purchasing those products either through our arrangements with Vitol and our subsidiary entity in Singapore or other suppliers located in Australia. In that regard, it is noted that, while the original source of those products may in some cases have been located in a country with a higher inherent modern slavery risk, the production, operation and trading of these products requires technical and professional skills and use of capital intensive assets that are at a low risk for modern slavery.

#### Targeted actions to address vulnerable categories of work

Viva Energy and our partners have targeted actions in place to actively monitor and review modern slavery risks across vulnerable categories of work, including:

- Seafarers working on ships and at ports transporting our products
- Construction workers working to build and maintain our infrastructure
- Cleaning staff and security guards working across our operations
- Transport drivers transporting our products to our sites and customers
- Workers across our information, computers and technology (ICT) supply chain.

## 5. Identifying, assessing and addressing our modern slavery risks continued

### 5.3 Risk assessments across Energy & Infrastructure and Commercial & Industrial businesses continued

#### Targeted actions to address specific categories continued

Examples of targeted approaches including partnerships with third party organisations to manage modern slavery risks specific to these areas are described below:

Industry	Actions
<b>Seafarers</b>	<p>Viva Energy depends on shipping and seafarers to transport crude, feedstocks, refined products and other imported goods to Australia.</p> <p>During 2024, Viva Energy's Supply and Trading Assurance Team vetted more than 650 vessels and 4 were rejected for technical and operational reasons. None of the rejections were on the basis of failing to meet minimum crew management or welfare requirements or modern slavery concerns.</p> <p>Information on the range of vetting processes and measures that Viva Energy has in place to safeguard seafarer health and wellbeing was included in our 2023 Modern Slavery Statement.</p> <p>During 2024, we renewed our long standing sponsorship with Mission to Seafarers Melbourne. We are proud to be the first anchor corporate member and our ongoing partnership reflects Viva Energy's commitment to supporting the maritime community and ensuring the welfare of those who work at sea.</p>
<b>Construction industry workers</b>	<p>Viva Energy uses the ISNetwork platform to assist Viva Energy to pre-qualify contractors and suppliers as eligible to carry out construction works on Viva Energy E&amp;I sites. Use of this platform helps ensure that all contractors and suppliers working on Viva Energy's sites meet Viva Energy's safety, regulatory and site-specific requirements. ISNetwork includes a modern slavery assessment as part of its pre-qualification process for contractors and suppliers. This assessment typically involves contractors and suppliers answering questions related to their policies and practices on modern slavery including oversight of their supply chain, workforce composition and the use of migrant labour, submission of relevant documentation that demonstrates compliance with anti-slavery laws and regulations and use of ISNetwork review and verification services (RAVS) to ensure information meets the required standards.</p> <p>Viva Energy also requires that all contractors and suppliers performing work across Viva Energy's service station network, depots and commercial facilities are accredited by Workplace Clearance Group (WPCG). The WPCG accreditation system forms part of Viva Energy's targeted due diligence program for ensuring overall safety of construction workers carrying out work for Viva Energy.</p>
<b>Cleaning and security industry workers</b>	<p>We require our cleaning and security services suppliers to share with us on a periodic basis information in respect of:</p> <ul style="list-style-type: none"> <li>• Ongoing compliance with the minimum employment entitlements set out in the National Employment Standards;</li> <li>• The extent to which they engage migrant and temporary workers and measures they have in place to create a fair and supportive environment for migrant and temporary workers, ensuring they are treated with respect and dignity.</li> <li>• Policies and procedures they have in place to prevent modern slavery and human trafficking in their operations and supply chains</li> <li>• How they ensure that all workers, including subcontractors, are paid fairly and on time</li> <li>• Any social audits or assessments conducted on their supply chain to identify and address modern slavery risks.</li> </ul> <p>Specifically in respect of security workers:</p> <ul style="list-style-type: none"> <li>• all security providers and workers engaged by our security providers must be licensed in accordance with applicable State legislation and licensing requirements which ensures that security providers meet certain standards of conduct, training and accountability;</li> <li>• our primary security provider is accredited through ISNetwork which provides additional assurance to Viva Energy in respect of demonstrating compliance with anti-slavery laws; and</li> <li>• our Group Security Standard is incorporated as a contractual obligation into our security services contracts and commits Viva Energy and our security providers, as a collaborative effort, to implement the Voluntary Principles Initiative on Security and Human Rights. The Voluntary Principles Initiative is a membership-based global multi-stakeholder platform dedicated to sharing best practices and mutually supporting the implementation of the Voluntary Principles. While Viva Energy is not a member of initiative Viva Energy employees are engaged in the platform through our strategic fuel supply arrangement with Vitol.</li> </ul>



## Industry

## Actions

### Transport drivers

Viva Energy engages specialist dangerous goods transport providers to transport fuel, chemicals, bitumen and lubricants 24/7 across Australia. Viva Energy is proud to have an ongoing partnership with National Road Safety Partnership Program (NRSP). We are a founding partner of the NRSP and very proud of our active commitment to improving road safety and driver well-being initiatives led by NRSP since 2012. Participation in NRSP enables Viva Energy to partner with industry stakeholders and road transport suppliers to support the health and wellbeing of transport drivers overall. Viva Energy requires our carriers to maintain accreditation under the National Heavy Vehicle Accreditation Scheme (NHVAS). NHVAS accreditation provides assurance under an independent audit framework on employment and business standards and practices adopted by heavy vehicle operators and their compliance with national heavy vehicle laws. This includes an assessment against measures in place for preventing modern slavery within a heavy vehicle operator's employment practices and supply chains. However, the purpose of NHVAS and NRSP is generative and much wider than modern slavery risks, it covers all aspects of compliance with national heavy vehicle transport laws.

### Information and communications technology

When procuring technology equipment for use by our employees, we seek to engage with suppliers who source technology equipment from suppliers that are part of the Responsible Business Alliance (RBA) Code of Conduct, which covers labour, health and safety, environmental practices, ethics and management systems and includes focuses on the prohibition of forced labour, young workers and compliance with local laws in relation to working hours, wages and benefits. Suppliers who are members of RBA are committed to supporting the rights and wellbeing of workers and communities worldwide affected by the global electronics supply chain and undergo regular assessments and audits to ensure compliance with the RBA standards. These assessments cover various aspects including labour practices, environmental impact, and ethical conduct.





## 5. Identifying, assessing and addressing our modern slavery risks continued

### 5.4 Risk assessment across Convenience & Mobility supply chain

Our risk mapping and assessment shows that the supply chains specific to our Convenience & Mobility business pose more salient risks compared to our overall modern slavery risk exposure in our E&I and C&I supply chains.

Based on our assessments, we have identified the following modern slavery risk “hotspots” within our Convenience & Mobility supply chain.

High risk areas	Potential risks
<b>Sourcing and processing of raw materials such as tobacco, cocoa, tea and coffee from manufacturers who supply our GFR</b>	<ul style="list-style-type: none"> <li>• Lack of visibility of working conditions in some origins of these raw materials</li> <li>• Reliance on migrant and unskilled labour force</li> <li>• Higher likelihood of forced labour and child labour</li> <li>• Lack of available information</li> <li>• Absence of controls to manage risk and events of modern slavery</li> </ul>
<b>Manufacturing in our GFR supply chain, such as toys, gadgets and accessories</b>	<ul style="list-style-type: none"> <li>• Lack of visibility of working conditions</li> <li>• Unfair recruitment processes in some manufacturing countries</li> <li>• Reliance on migrant and unskilled labour</li> <li>• Complex and fragmented supply chains</li> <li>• Lack of available information</li> <li>• Absence of controls to manage risk and events of modern slavery</li> </ul>

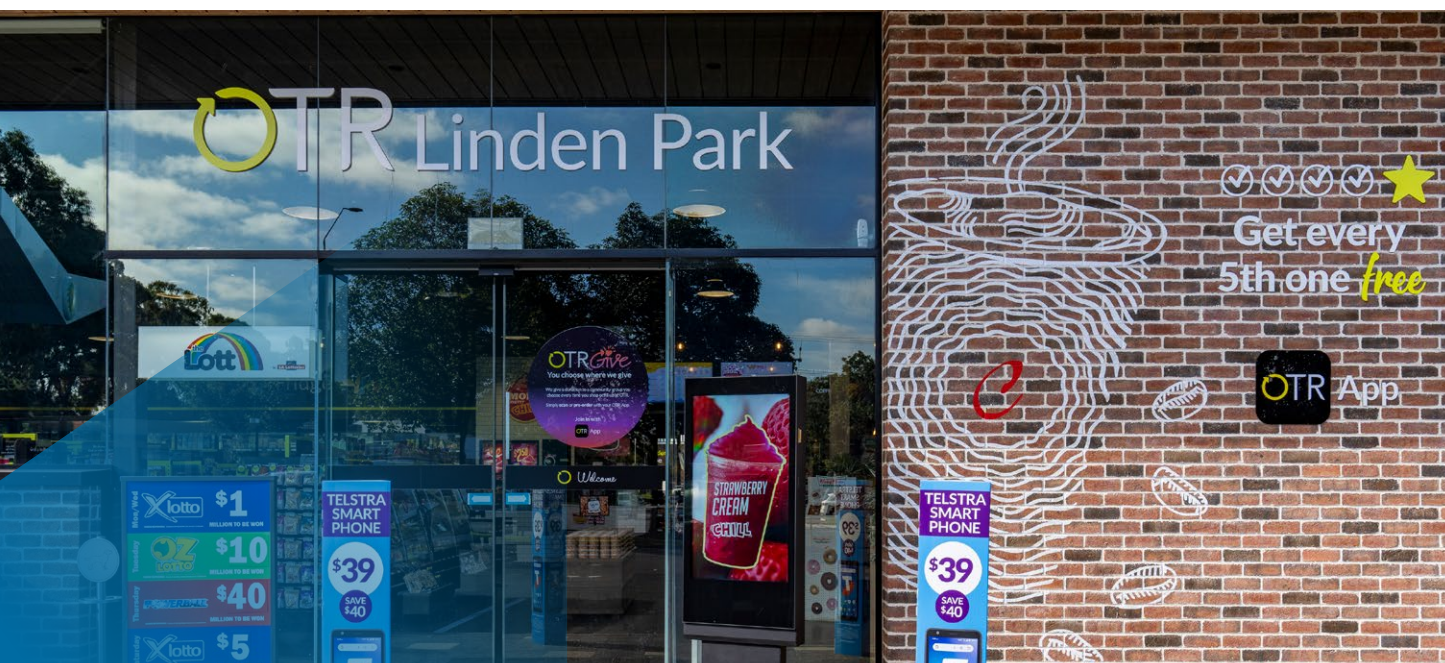
### 5.5 Targeted actions to address assessed risks

During 2024 Viva Energy continued to procure products through ongoing product supply arrangements established with Coles Group to support Viva Energy’s Reddy Express convenience offering. Through this arrangement Viva Energy accesses suppliers that also supply to Coles Group in accordance with Coles Group ethical sourcing policy and requirements which include requirements for suppliers to ensure fair labour practices and safe working conditions and the prohibition of forced labour. In 2024 we continued to coordinate and work cooperatively with Coles to understand due diligence and monitoring undertaken by Coles as well as conducting our own due diligence and monitoring activities. This work included reviewing Coles Group’s 2024 Modern Slavery Statement.

With the acquisition of OTR business in 2024, Viva Energy took control of new supply chains. As a result, it has been important for Viva Energy to:

- build our understanding of these new supply chains;
- incorporate our understanding of the new supply chains into our overall modern slavery risk profile; and
- work on integration with our existing Convenience & Mobility supply chains.

Post-acquisition, our supply chains have become more complex, more fragmented and more global. Viva Energy is committed to identifying the salient risks across our Convenience & Mobility business and ensuring it has targeted actions in place to address these risks. Over 2025 more work will be done as part of our integration and transformation program of work to focus on these risk areas and targeted actions.



Examples of targeted approaches including partnership with third party organisations to manage modern slavery risks specific to our supply chains supporting our growing Convenience & Mobility offerings are set out below:

<b>SMGB</b>	<p>Our SMGB buying and production teams source an array of products for resale across our SMGB network of stores from suppliers based in Australia as well as through attending global trade fairs in Hong Kong and China.</p> <p>The trade fair events include sessions focused on modern slavery to help raise awareness among attendees. Our buying and production team carries out preliminary assessments on current and potential suppliers through gathering of information in respect of their compliance with ethical standards and examination of certifications and audit reports. This transparency helps our buying and production team assess the risk levels of potential suppliers.</p> <p>Our buying and production team undertake site visits to factories and office spaces to directly observe working conditions. Direct observation may reveal signs of forced labour or poor labour practices which might not be evident through documentation review alone. Site visits also help verify that suppliers are adhering to our compliance standards. This hands-on approach helps ensure that what has been reported aligns with what is observed. During these site visits members of our buying and production team (who are bi-lingual) may engage directly with workers to hear about their direct experiences. These site visits help build stronger relationships with our suppliers.</p>
<b>QSR</b>	<p>Food ingredients used across our Quick-Service offering is mostly sourced from approved suppliers with the franchisor. Our franchisor partners separately provide modern slavery statements published on the register which set out their supporting supply chains, associated risks and actions they undertake to address those risks.</p> <ul style="list-style-type: none"> <li>• Pre-qualification and due diligence undertaken by our franchisors across our Quick-Services offering suppliers includes:</li> <li>• Completion by suppliers of self-assessment questionnaires (SAQs), results of which are reviewed and monitored annually by our franchisors.</li> <li>• Membership by suppliers of Sedex and completion and sharing of Sedex Members Ethical Trade Audit (<b>SMETA</b>) audit results</li> <li>• Site based audits and visits carried out by our franchisors across suppliers</li> </ul> <p>The findings of these assessments have shown that all our suppliers have established comprehensive and effective policies in place addressing Modern Slavery.</p> <p>Several of our suppliers are also part of Sedex and perform SMETA audits on their suppliers, and those who are not, perform regular audits and factory visits to ensure fair and safe working conditions; no instances of violation of human rights have been found.</p>
<b>OTR stores</b>	<p>We procure an extensive range of goods for resale across our OTR stores including grocery and meal prep essentials, baked in store pies and pastries, snacks and beverages, BBQ, entertaining and automotive supplies.</p> <p>There are approximately 350 suppliers that provide goods for resale across our OTR stores. The OTR buying and production teams have longstanding practices in place with these suppliers to work collaboratively to assess modern slavery risks and to address any identified concerns this includes:</p> <ul style="list-style-type: none"> <li>• Undertaking pre-engagement and during engagement periodic due diligence investigations through self-assessment questionnaires.</li> <li>• Ensuring our suppliers are on-boarded to our standards and codes of practice through the Supplier Handbook.</li> <li>• Visiting manufacturing facilities of suppliers for direct observation.</li> </ul>

## 5. Identifying, assessing and addressing our modern slavery risks continued



### 5.6 Customer surveys

Our Commercial & Industrial business is a supplier to some of Australia's largest companies operating across the resources, aviation, mining, road transport and bitumen sectors. As such we are subject to regular review by those customers as part of their own modern slavery due diligence. During 2024, we completed more than 50 customer initiated self-assessment questionnaires and shared a range of information with our customers on our approach to managing modern slavery risks across specific supply chains established to support those customers. None of those assessments involved findings of modern slavery risks which needed to be pursued further.

This continuous cycle of assessment through our customers provides both a real time ongoing assessment of our risks, while allowing us to better understand modern slavery due diligence practices and hence refine our own practices to maintain continually improving standards.

### 5.7 Improving staff awareness

Viva Energy is committed to ensuring that all appropriate staff within its operations that have a connection with people or procurement activities understand modern slavery and are equipped to assess modern slavery risks.

In that regard, in 2024 all senior leaders and staff with responsibility for managing external supplier procurement completed modern slavery training including refresher training. All new hires during 2024 with responsibilities in these areas were required to undertake the training, which included relevant employees within the newly acquired Convenience business.

The training program provides a general background to the modern slavery legislation and Viva Energy's responsibilities under the Act. Importantly, the program provides practical tips on how to recognise practices that may constitute modern slavery, including key factors that increase the risk of modern slavery.

Viva Energy considers that this training provides strong coverage for those workers who may be exposed to modern slavery compliance risks in their day-to-day operations.

This targeted training is in addition to the broader training undertaken by all employees and contractors of Viva Energy, who must confirm their understanding of the Code of Conduct and complete mandatory training on anti-bribery and anti-corruption, equal employment opportunity and workplace health and safety at least once every two years.

Going forward, we will continue to provide training and other forms of communication which aim to strengthen the ability across the Viva Energy to identify any risks of modern slavery practices.



## 5.8 Case studies



### Melville Island case study

In December 2024, Viva Energy Australia announced a significant collaboration with Tiwi Port and Marine Pty Ltd and the Department of Defence to ensure the ongoing operations of the Melville Island Fuel Facility.

This partnership aims to support various industries in the region while enhancing Defence's fuel capability and resilience.

#### Key Aspects of the Partnership

- **Facility Management:** Viva Energy entered a long-term exclusive license to manage the 30-million-litre fuel facility located 80 km north of Darwin
- **Indigenous Collaboration:** The partnership emphasizes self-determination, allowing Tiwi Port and Marine to acquire the overall port facility. A portion of future storage revenue will go directly to the Tiwi-led organization once a certain level of storage is achieved
- **Economic Impact:** The deal provides long-term certainty for the business and supports the local economy by creating jobs and opportunities for the Tiwi people

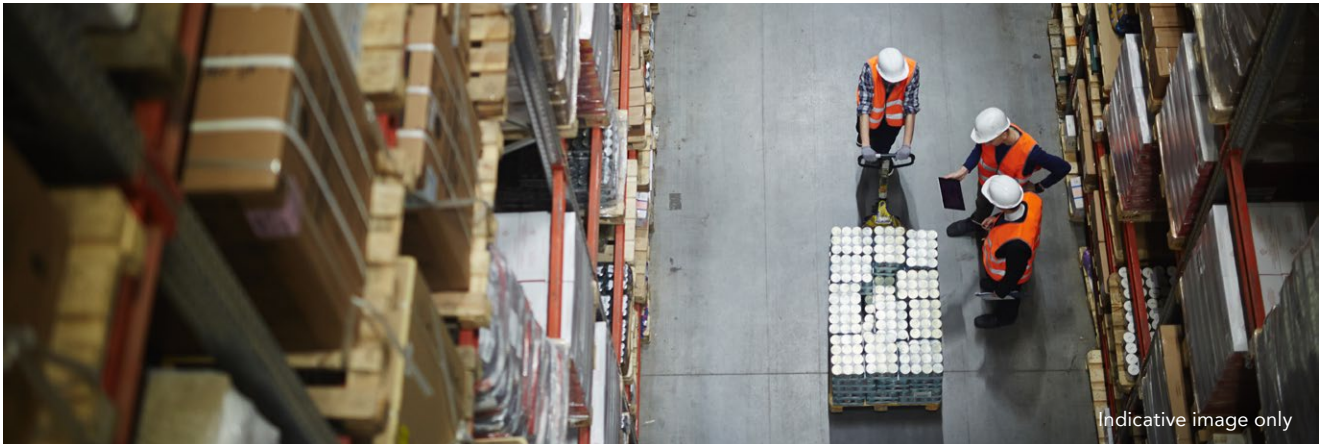
#### Objectives and Benefits

- **Skill Transfer and Employment:** Viva Energy will work with the Tiwi communities to transfer skills and knowledge through training and employment opportunities
- **Community Services:** The partnership aims to unlock additional business opportunities and enhance access to community services

This collaboration aligns with Viva Energy's Third Innovate Reconciliation Action Plan, which focuses on supporting reconciliation and positive outcomes for First Nations people and represents a significant step towards sustainable development and economic empowerment for the Tiwi people. By combining commercial expertise with a commitment to community and cultural values, this collaboration sets a positive example for future initiatives.

## 5. Identifying, assessing and addressing our modern slavery risks continued

### 5.8 Case studies continued



#### Factory site visit to China

An Australian based distributor of products manufactured in China was engaged to supply a range of finished lighting products.

Our buying and production team undertook a site visit to factory facilities in Zhongshan to understand measures in place to safeguard against modern slavery risks in their operations and supply chains. This included carrying out site-based interviews with showroom and factory workers.

The site visit covered understanding approaches taken to manage:

- (a) Unsafe conditions;
- (b) Forced or exploitative work practices;
- (c) Passport confiscation; and
- (d) Bonded and child labour

Through site-based meetings a deeper understanding of the distributor's supply chain and employment practices in China was gained. Sharing of information was two-way and including transparent sharing of third-party audit results and information (for example BSCI Audit program). No issues requiring further investigation or remediation were identified. Key aspects of the labour laws that were discussed with the supplier team members included:

**Work hours:** In China the legal standard working hours are eight hours per day and 44 hours per week. Any hours worked beyond this limit are considered overtime which cannot be more than 3 hours per day and 36 hours per month. Workers who volunteer for overtime are entitled to receive additional pay or compensatory time off, as mandated by Chinese labour laws. The rate of overtime pay was typically higher than the regular hourly rate and above the amount mandated by Chinese labour laws to promote quality production outcomes.

**Safety and welfare:** the supplier demonstrated safety controls and procedures that were in place across the factory including protection devices on equipment, training and induction records, personal protective equipment standards and monitoring, clear signage and access to first aid and emergency management. In terms of wellbeing and amenities, staff had access to amenities facilities and were provided on-site meals.

**Grievance Mechanism:** The supplier has in place processes with regards to how and where to approach the management in event a grievance is to be communicated. The grievance can be communicated to the HR department via email and in-person with the local HR representative. Additionally, the company has in place an anonymous helpline for employees to use.

**Use of Migrant Workers:** no use of migrant workers was observed or reported.

**Passport Confiscation:** supplier demonstrated that it does not hold or confiscate the passports of employees. An exception is when the company manages the employee's work visa and immigration process where the employee's passport is collected and sent to the local immigration authorities. Following visa processing by immigration authorities, the passport is duly returned to the employee.

**Bonded and Child Labour:** no use of child workers was observed or reported. Employees were observed to be experienced and long-term employees with gender split of approximately 50:50.





## Fabrication yard visit to Thailand

In 2024 members of our project team working on the Ultra-Low Sulphur Gasoline Project for Geelong Refinery travelled to Chon Buri, Thailand to visit the fabrication facilities of one of our overseas suppliers for the project.

Through site-based meetings a deeper understanding of the supplier's supply chain and employment practices in Thailand was gained. Sharing of information was two-way and overall findings were:

### Management of Lower Tier Suppliers

The supplier demonstrated that they self-perform much of the contracted work and where they do engage subcontractors they are required to adhere to human rights and lawful employment practices.

### Employment Contract for Migrant Workers

The supplier demonstrated that it is an equal opportunity employer and had employment contracts in place in accordance with local Thai labour laws. All employees, regardless of country of origin and nationality are engaged on the same employment contract.

Key aspects of the labour laws that were discussed were:

**Work hours:** The contract sets working hours of no more than 48 hours per week and any overtime is compensated at one and a half times the regular rate based on documented timesheets.

**Safety:** fatigue management is strictly monitored by the site project teams where workers are only allowed to work a maximum of 14 hours a day. There are stipulated times for lunch breaks and water breaks to avoid fatigue and weather-related heat exhaustion.

**Grievance Mechanism:** A step-by-step process was in place to ensure employees can communicate grievances to the HR department via email and in-person with the local HR representative. Additionally, the supplier had in place an anonymous helpline for employees to use.

### Passport Confiscation

The supplier demonstrated that they comply with local Thai labour laws and do not hold or confiscate the passports of employees. An exception is when the company manages the employee's work visa and immigration process where the employee's passport is collected and sent to the local immigration authorities. Following visa processing by immigration authorities, the passport is duly returned to the employee.

### Bonded and Child Labour

No child labour was observed. Employees were competent and experienced tradespersons such as mechanical and piping fitters, welders and electricians employed as per local Thai labour laws.



# 6.

## Assessing effectiveness and looking forward

### 6.1 Looking forward

Given that our business and supply chains continue to evolve, we are aware that we need to continue to remain vigilant. As we undertake our transformation journey we are committed to ensuring the integrated systems and processes we apply across our Convenience & Mobility business encompass robust risk assessment tools, supplier management and data based reporting platforms to drive compliance and promote responsible sourcing practices including compliance with anti-slavery policies.





## 6.2 2025 Focus Areas

In 2025, Viva Energy’s focus will be in the following areas:

Focus area	Key actions
<b>Review of Operations and Supply Chains – Expanding Convenience Business</b>	<p>In 2025 we plan to implement and leverage the Sedex platform to assess current and new suppliers’ risk. Implementation of Sedex across our Convenience &amp; Mobility business is our priority. We will need to conduct Sedex training and build capacity in the business to extend the understanding of our current supply chain and the potential risks. Utilise the Sedex tool to identify key suppliers and take further actions such as targeted audits.</p> <p>Once the Sedex platform has been installed and knowledge has been developed, we aim to increase our suppliers’ transparency, activities, and supply chains.</p>
<b>Engage with Industry and other organisations</b>	<p>Continue to collaborate with other businesses and organisation including our customers, suppliers and government entities to combat modern slavery (for example support our suppliers with training to increase awareness of human rights and modern slavery risks).</p>
<b>Building culture and awareness</b>	<p>Continuing to develop Viva Energy’s internal capability to identify modern slavery risks including the taking of further steps to ensure broader awareness and understanding of risks across Viva Energy.</p> <p>In 2025 we plan to increase the scope of employees currently selected to complete the Modern Slavery training this will include training for all Convenience &amp; Mobility employees as part of their onboarding phase and buying and sourcing teams.</p>



## 6. Assessing effectiveness and looking forward continued

### Assessing Effectiveness

Viva Energy assesses the effectiveness of our modern slavery risk management program on a regular basis by using the feedback channels and reporting mechanisms set out below. During 2024, no instances of modern slavery or suspected modern slavery were reported to Viva Energy via any of the available feedback channels or reporting mechanisms.

Channel	Feedback																
<b>ERM Framework</b>	Modern slavery risks are integrated into Viva Energy's ERM Framework. This provides an opportunity for the Board, Board Committees, ELT and Risk Owners to assess the status of the risk, the effectiveness of controls and measures in place and engage with stakeholders accordingly.																
<b>Customer and other stakeholder engagement</b>	Adequacy of our approach to modern slavery reporting and delivering on our initiatives is regularly reviewed and shared with our key customers. We value their feedback and see this a critical way for us to assess our own effectiveness.																
<b>Governance and policies</b>	<p>Periodic scheduled reviews of our policy settings and governance framework provides opportunity for us to assess the effectiveness of our overall governance framework, alignment with emerging practice and commitments we make in respect of responding to modern slavery risks.</p> <p>Our internal audit function through annual planning process provides Board and Management with feedback and insights on the effectiveness of risk management, compliance, control and governance.</p>																
<b>Supplier code of conduct and other reporting mechanisms</b>	<p>Grievance processes provide opportunity for Viva Energy to learn from stakeholders to inform future action and investigate to determine the source of the risk and if necessary, plan for remediation.</p> <p>Viva Energy has in place the following grievance channels through which individuals can raise concerns:</p> <table> <tr> <th>Employees</th><th>Suppliers and other stakeholders</th></tr> <tr> <td>Whistleblower</td><td>Whistleblower</td></tr> <tr> <td>Viva Energy Australia Grievance Policy</td><td>Confidential 24/7 Stop Line</td></tr> <tr> <td>Confidential 24/7 Stop Line</td><td>Supplier concerns may be raised directly to Viva Energy supplier representatives in accordance with Supplier Code of Conduct</td></tr> <tr> <td>Confidential 24/7 Respect@Viva Line</td><td>Heavy Vehicle Confidential Reporting Line – administered by NHVR. This is a secure, national, confidential telephone service for participants in the heavy vehicle industry and its supply chain to report safety issues relating to procedures, practices or conditions in the heavy vehicle transport industry and its supply chain that might endanger the safety of a heavy vehicle driver, their passengers, other road users or the community.</td></tr> <tr> <td>Confidential 24/7 EAP services</td><td></td></tr> <tr> <td>People Queries inbox monitored during business hours</td><td></td></tr> <tr> <td>Access to assigned members of the People &amp; Culture team during business hours</td><td></td></tr> </table>	Employees	Suppliers and other stakeholders	Whistleblower	Whistleblower	Viva Energy Australia Grievance Policy	Confidential 24/7 Stop Line	Confidential 24/7 Stop Line	Supplier concerns may be raised directly to Viva Energy supplier representatives in accordance with Supplier Code of Conduct	Confidential 24/7 Respect@Viva Line	Heavy Vehicle Confidential Reporting Line – administered by NHVR. This is a secure, national, confidential telephone service for participants in the heavy vehicle industry and its supply chain to report safety issues relating to procedures, practices or conditions in the heavy vehicle transport industry and its supply chain that might endanger the safety of a heavy vehicle driver, their passengers, other road users or the community.	Confidential 24/7 EAP services		People Queries inbox monitored during business hours		Access to assigned members of the People & Culture team during business hours	
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Confidential 24/7 EAP services																	
People Queries inbox monitored during business hours																	
Access to assigned members of the People & Culture team during business hours																	







# 7.

## Consulting across our business

As Viva Energy grows and diversifies, we recognise that it is critical we take a coordinated and holistic approach to managing our enterprise-wide response to addressing modern slavery risks.

This statement was developed through cross-functional and cross-business work streams coordinated through our Modern Slavery Committee. This consultation process included consulting and engaging directly with:

- directors of Reporting Entities through the Executive Leadership Team, the Audit and Risk Management Sub-Committee, the Board Audit and Risk Committee and/or E&I, C&M and C&I Management Committees.
- members of the Executive Leadership Team.
- key functions across the business including sourcing and procurement, legal, people and culture, sustainability and business development, health, safety, security and environment and technology and digital.

Drafts of this statement were reviewed by the Executive Leadership Team, the Audit and Risk Management Sub-Committee, the Board Audit and Risk Committee and the Board.







Freezer

Fridge

we never close

Dinner sorted

Lunch sorted

Snacks sorted

Breakfast sorted

Fresh produce



