



Modern Slavery Statement 2021

Helping people reach their destination



Modern Slavery Statement 2021

Introduction

Modern slavery involves serious exploitation and undermining of people's liberties. Viva Energy has zero tolerance for all forms of modern slavery.



Scott Wyatt
Chief Executive Officer

Viva Energy is proud of the work we do to help people reach their destinations. We play an important role in maintaining the country's energy security, we help our customers get about or run their businesses, we help people develop their careers, and help build better and more inclusive communities. We are committed to conducting 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 customers and suppliers in our supply chains.

In recent years, this has also involved an increasing focus on doing everything we can as a company to mitigate the global problem of modern slavery. Modern slavery involves serious exploitation and undermining of people's liberties. Viva Energy has zero tolerance for all forms of modern slavery.

During 2021, we continued to improve our vetting process for approving vessels used for the carriage of our fuel aimed at ensuring the safety of crew on board vessels. We also surveyed our key suppliers using a third party testing tool to better understand the risk of modern slavery in our broader supply chain. Those learnings continue to be shared internally through our targeted modern slavery training. The goal is to ensure our people are able to identify potential risks of modern slavery in our operations and supply chains.

While we are making progress in many areas, there is always more we can do. In the year ahead, we will provide more opportunities to lift the understanding of modern slavery at all levels of our organisation. We will also work further with our suppliers and actively seek to help them where possible. This will include sharing our own learnings with suppliers who do not have the same level of maturity in their modern slavery compliance programs.

The goal is to ensure our people are able to identify potential risks of modern slavery in our operations and supply chains.

We have made public commitments through this statement to hold us accountable to this outcome, and I am determined that we continue to make progress so that we play our part in building a better world for all people.

If you have any questions or feedback on this statement, please do not hesitate to contact us via www.vivaenergy.com.au.



Scott Wyatt
Chief Executive Officer
17 March 2022

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2021 Highlights



Issued and received responses from 101 key suppliers to an independently produced survey aimed at gaining a better understanding of the potential risks of modern slavery through our supply chain. The conclusion of the survey responses was that Viva Energy has an overall low risk of modern slavery through its supply chain.



Undertook a deep dive with respect to potential modern slavery risks associated with the shipping vessels used to transport the crude oil and finished products which Viva Energy acquires.



Continued the rollout of compulsory modern slavery training program, which has been undertaken by 185 of our workforce, including all senior leaders and staff with responsibility for managing external supplier procurement.



Published a Supplier Code of Conduct setting out Viva Energy's expectations of suppliers with whom it does business, including their responsibilities in relation to modern slavery.



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1. Our commitment and approach to governance

At Viva Energy, everything we do is driven by our purpose to help people reach their destination, including our employees, customers, business partners and investors. Our objective is to achieve this in a way that contributes to positive sustainability outcomes, and is aligned with our values: Integrity, Responsibility, Curiosity, Commitment and Respect.

As part of our Business Principles and Code of Conduct (Code of Conduct), we commit to integrating economic, environmental and social considerations into business decision-making.

During 2021, we undertook our annual materiality assessment to confirm where our operations, products and industry have the greatest impacts (positive or negative), and to understand what is most important to our stakeholders. We use the output of this work to determine our strategic focus areas and to guide our reporting. The assessment process we followed to determine material issues and key focus areas is outlined in the adjacent table.

As a result of this work during 2021, we identified seven strategic focus areas spanning all material sustainability issues, risks and opportunities relevant to our business. We consider these to be the areas that matter most to Viva Energy and its stakeholders, and where we can make the most positive impact. These seven focus areas are set out in the Sustainability Framework diagram below.

1 Identify important sustainability issues
 We engaged with our stakeholders and identified sustainability issues based on:

- economic, environmental and social positive and negative impacts and the risks associated along our value chain;
- current and emerging global trends in sustainability; and
- future challenges and opportunities for our sector.

2 Prioritise the sustainability issues
 We then prioritised the sustainability issues based on how they:

- substantively influence the assessments and decisions of stakeholders; and
- reflect the Group's significant economic, environmental, and social impacts.

3 Define focus areas
 We defined the key sustainability issues and mapped these to the GRI Standards and UN SDGs. We then clustered these priority topics into focus areas, which we use in our sustainability approach and reporting.

One of the seven strategic focus areas recognises Viva Energy's commitment to operate with integrity by acting in an ethical and transparent manner. This commitment recognises the growing external stakeholder expectations and the increased focus on issues such as modern slavery.



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2. 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 2021 to 31 December 2021.

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
Westside Petroleum Consolidated Holdings Pty Limited	612 235 426

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

The table below outlines the seven mandatory criteria of the Act and 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	Section 2 – Reporting entities	5
2. Describe the structure, operations and supply chains of the reporting entity	Section 3 – Structure, operations and supply chain	6-8
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 4 – Risks of modern slavery practices in operations and supply chains	9-11
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 – Actions taken to assess and address risks	12-16
5. Describe how the reporting entity assesses the effectiveness of these actions	Section 6 – Assessing the effectiveness of actions taken	17
6. Describe the process of consultation with any entities that the reporting entity owns or controls	Section 5.5 – Consultation with entities Viva Energy owns or controls	14
7. Provide any other relevant information	Most information in the Joint Statement directly addresses the first six criteria.	4-17

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3. Structure, operations and supply chains

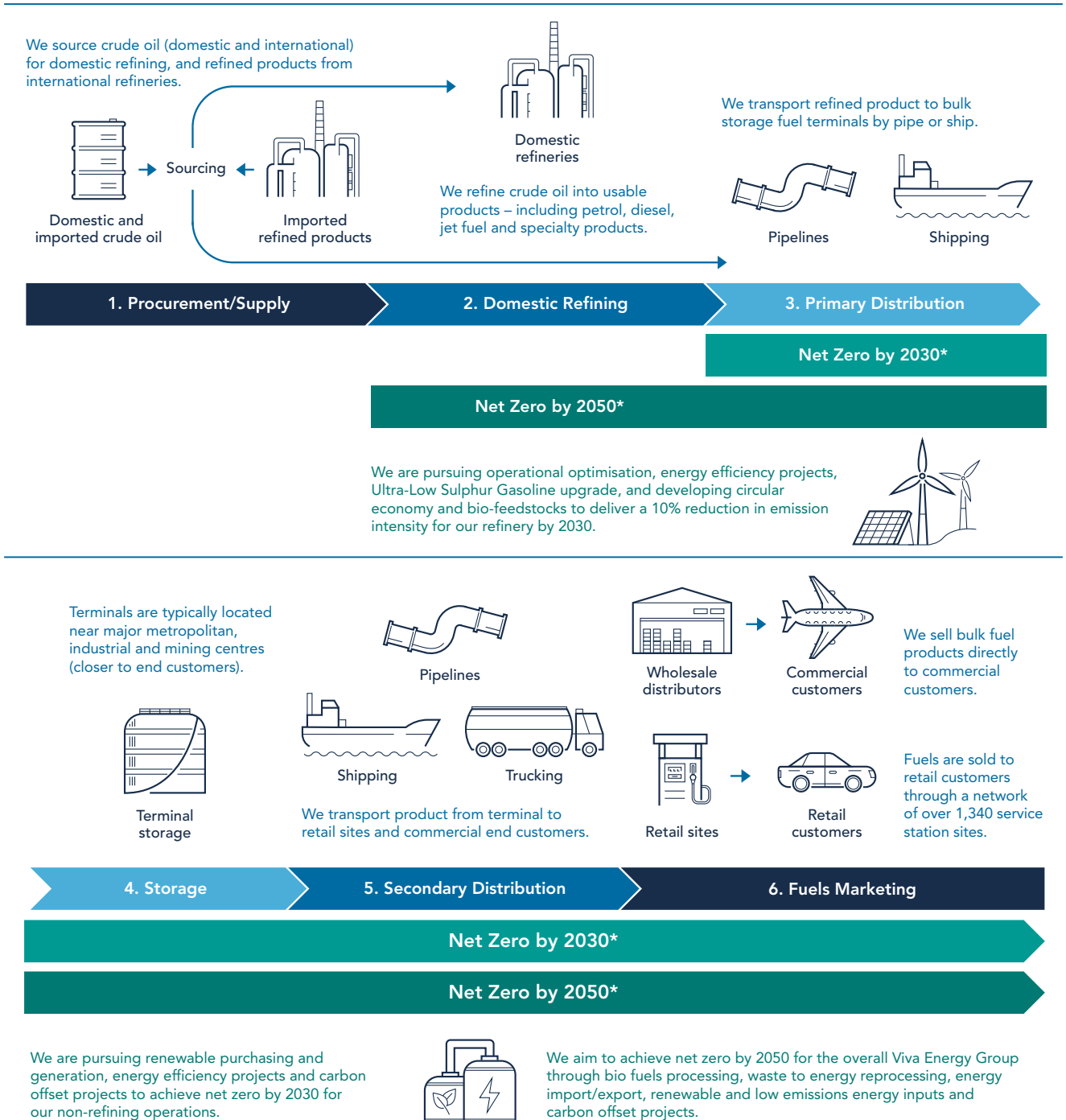
3.1 Structure

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 34 controlled entities. A full list of the controlled entities is included at Note 28 to the consolidated financial statements within Viva Energy's 2021 Annual Report. This list includes the reporting entities other than Viva Energy Group Limited.

3.2 Our operations

A summary of Viva Energy's operations is set out in the diagram and table below.







* Net Zero commitment applies to Scope 1 and 2 emissions for activities under our operational control which excludes primary and secondary distribution by shipping.

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3. Structure, operations and supply chains continued

3.2 Our operations continued




Operations	Details
 <p>Retail Fuels and Marketing</p>	<p>Viva Energy supplies and markets quality fuel products through a national network of over 1,340 Shell, Liberty and Westside branded retail service stations with over 700 of the sites being operated by Coles Express under the Coles Alliance. Viva Energy also supplies other retail operators and wholesalers.</p>
 <p>Commercial Fuels and Marketing</p>	<p>Viva Energy is a significant supplier of fuel, lubricants and specialty hydrocarbon products to commercial customers in the aviation, marine, transport, resources, construction, agriculture and manufacturing industries.</p>
 <p>Refining</p>	<p>Viva Energy owns and operates the country's largest and most complex refinery, located at Geelong in Victoria. Refineries play an important role in processing Australian and imported crude oil into petroleum products which meet Australian specifications and help to enhance fuel supply security for the country.</p> <p>The Geelong Refinery supplies more than 10% of Australia's total fuel requirements (approximately 50% of Victoria's fuel demand) and is the only manufacturer of bitumen, aviation gasoline (or 'Avgas' – for use in piston engine aircraft), and aromatic and aliphatic based solvent products.</p>
 <p>Supply and Distribution</p>	<p>Viva Energy owns or contracts access to a national infrastructure network comprising import terminals, storage tanks, depots and pipelines positioned across metropolitan and regional Australia in all states and territories.</p> <p>Viva Energy operates barges which are used to supply marine fuels to cruise and container shipping customers in Sydney and Melbourne, and also contracts with a number of fuel transport companies to distribute fuels to customers throughout the country. Through its wholly owned subsidiary, Liberty Wholesale, Viva Energy also operates its own fuel delivery fleet of over 80 vehicles.</p>

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3. Structure, operations and supply chains continued

3.3 Our supply chain

The table below details the most material categories of third party spend incurred across Viva Energy's operations. Virtually all of the key suppliers by number in the listed categories are located in Australia with the exceptions being the suppliers of crude oil and fuel products, chemicals and catalysts, and fuel shipping. Many of the categories of spend apply to more than one of the operational lines, but have been included where most appropriate in the table for simplicity.

Operations	Key third party spend
 Retail and Commercial Fuels and Marketing	<ul style="list-style-type: none"> • Retail facility maintenance • Fuel equipment • Rent
 Refining	<ul style="list-style-type: none"> • Major services contractors • Environmental services • Energy providers • Chemicals and catalysts supply • Personal protective equipment and uniforms
 Supply and Distribution	<ul style="list-style-type: none"> • Road and rail transport services • Engineering services

The following operations and categories of spend apply to all operational lines so have been separately listed in the table below. It is noted that certain of the spend categories such as biofuels, along with cleaning and catering, are not material, the latter even less so during the COVID-19 pandemic, but have been included in the table given their higher perceived risk profile for modern slavery purposes.

Operations	Key third party spend
 Procurement of Crude Oil and Refined Products	<ul style="list-style-type: none"> • Crude oil and product supply • Fuel shipping • Biofuels supply
 Corporate Overheads	<ul style="list-style-type: none"> • Business administration services • IT equipment and services • Cleaning and catering



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4. Risks of modern slavery practices in operations and supply chains

During 2021, Viva Energy built on the foundations of its modern slavery work as described in its first Modern Slavery Statement covering 2020 (the **First Statement**).

The First Statement was aimed at establishing Viva Energy's framework for action to address modern slavery risks. It included a targeted analysis of a small group of key suppliers aimed at developing a better understanding of the potential modern slavery risks in Viva Energy's supply chains.

In 2021, Viva Energy conducted further work aimed at increasing its visibility, awareness, and understanding of modern slavery risks across the supply chains. This included a targeted analysis of a wider group of key suppliers and also involved posing questions to key suppliers aimed at understanding the risks further up the supply chains of those suppliers, i.e. beyond the 'Tier One' supplier itself.

Viva Energy also undertook a deep dive in 2021 with respect to potential modern slavery risks associated with the shipping vessels used to transport the crude oil and finished products it acquires. This was identified as a risk area for modern slavery in relation to Viva Energy's operations and supply chains, and Viva Energy understands that the relevant risks may have been heightened by the COVID-19 pandemic.

Viva Energy considers shipping to be the area that presents the greatest risk of modern slavery in Viva Energy's procurement activities, while also presenting an opportunity for Viva Energy to drive positive change given Viva Energy's involvement with the shipping industry and established relationships with key shipping service providers.



4.1 Risk assessment process

During 2021, Viva Energy undertook the process steps outlined below in order to review its operations and supply chains in relation to modern slavery risks.

Direct operations

1. We identified the location of our employees and contractors to determine whether any were connected with a geography that may present a heightened risk of modern slavery.
2. We categorised the nature of roles performed by the employees and contractors to determine whether any were connected with a sector or product/service which may present a heightened risk of modern slavery.

Supply chains

1. We identified our main direct suppliers in each of the categories of key third party spend set out in the table in section 3.3. The following parameters were applied to the selection of 'key' suppliers:
 - a. We ensured that suppliers in each of the procurement categories described above were included in the selection pool, as each procurement category has its own modern slavery risks.
 - b. Within each procurement category, we included the most material suppliers based on spend, as:
 - (i) Viva Energy is likely to have greater influence over those suppliers, if required to address a modern slavery risk; and
 - (ii) those suppliers are more likely to have multinational operations (i.e. outside Australia) which gives rise to heightened modern slavery risk.
 - c. Irrespective of the quantum of spend, we included all suppliers in categories perceived to be higher risk, such as cleaning services, catering services, uniform suppliers and biofuel suppliers. This view of perceived higher risk is supported by the guidance published by the Department of Home Affairs.¹
2. Through this process, we identified and received responses from 101 key suppliers to an externally prepared modern slavery survey. The responses to this survey enabled a substantive assessment of key modern slavery risks in Viva Energy's supply chains. The survey was designed by ethiXbase, in conjunction with the law firm Norton Rose Fulbright. ethiXbase is a company that specialises in developing tools to manage risk compliance with a particular focus on anti-corruption, human rights, labour and environmental risks.
3. We also: (a) engaged more extensively with Vitol, our key supplier of crude oil and vessel chartering activities, to better understand Vitol's vetting process for vessels and crew; and (b) tested Viva Energy's own vessel and crew vetting processes.

1. Commonwealth Modern Slavery 2018 – Guidance for Reporting Entities, at <https://www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-reporting-entities.pdf>.

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4. Risks of modern slavery practices in operations and supply chains continued

4.2 Conclusion of risk assessment

During 2021, the work undertaken by 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.

Direct operations

Viva Energy assessed the level of risk of modern slavery in its direct operations to be low.

Viva Energy's employees are predominantly skilled workers engaged in Australia. More specifically:

- Other than two Singapore-based employees, all of Viva Energy's workforce is based in Australia. This is depicted in the map below.
- Most employees are employed directly into skilled roles where experience is required, or via third party contracting companies who require contracted employees to abide by the Code of Conduct and induction processes.
- The frameworks that regulate conditions of employment in the industry provide robust safeguards against modern slavery practices occurring in Viva Energy's operations.

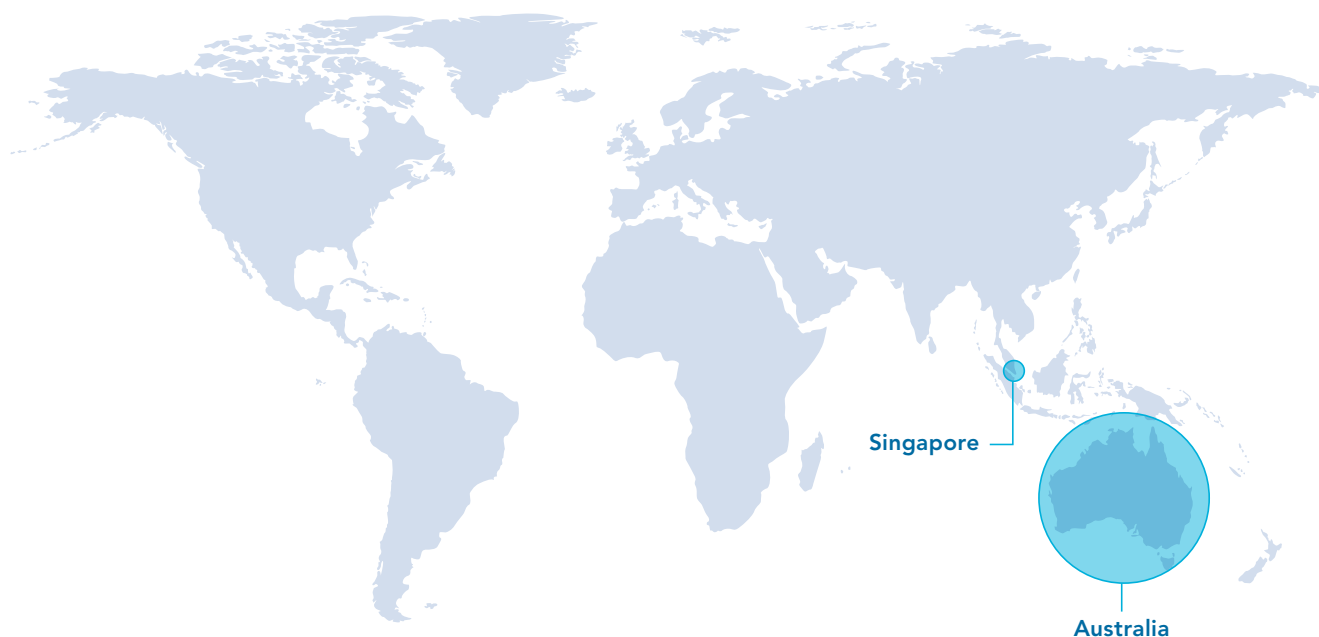
Further, Viva Energy takes the following steps to manage its workforce through its operations:

- 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.
- All employees must complete mandatory training on anti-bribery and anti-corruption, equal employment opportunity and workplace health and safety once every two years.

In light of the above, Viva Energy considers the risk of its own actions causing an adverse modern slavery impact to be low.

Accordingly, to the extent there is any adverse modern slavery impact associated with Viva Energy's operations, this is likely to be due to Viva Energy either contributing to, or being directly linked to, such impact (as distinct from 'causing' the impact). For example, if there is an allegation of modern slavery against a supplier with whom Viva Energy deals, Viva Energy may be considered to have contributed to this adverse modern slavery impact, or to be linked to it. The conclusions of our risk assessment of modern slavery existing in Viva Energy's supply chain is set out on the next page.

Map of Viva Energy's direct operations



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4. Risks of modern slavery practices in operations and supply chains continued

4.2 Conclusion of risk assessment continued

Supply chains

The key conclusion of the analysis of Viva Energy's supply chain was that the vast majority of Viva Energy's suppliers pose a relatively low modern slavery risk because they possess one or a combination of the following features:

- They are located and operate within Australia with no or minimal foreign connection. In 2021, approximately 95% of our direct suppliers by number were located in Australia.
- They supply equipment, materials, or other inputs that are technically difficult to produce and that would therefore more likely to have been sourced from a country posing a low modern slavery risk (to the extent they were sourced from offshore locations).
- 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, all of our suppliers are either Australian or global oil majors, most of whom have been required to comply with modern slavery laws in other jurisdictions for a number of years. Accordingly, such suppliers have in place thorough on-boarding processes for their own procurement.






This conclusion was supported by the responses to the survey received from 101 of our key suppliers. Further detail outlining the survey outcomes is set out in section 5.1 of this Joint Statement.

Further, the more focused work Viva Energy conducted regarding modern slavery risks relating to the operation of vessels used to transport crude oil and finished products indicated that a thorough vetting process is undertaken both by Viva Energy and our key supplier Vitol.

Notwithstanding the above, Viva Energy acknowledges that all products and services carry some risk of modern slavery in their supply chains (even if such risk may be relatively low). Set out below is a more detailed analysis on Viva Energy's approach to the products and services that carry a perceived higher level of modern slavery risk.

4.3 Inherent modern slavery risk areas

Insofar as Viva Energy's supply chain is concerned, using the guidance published by the Department of Home Affairs, Viva Energy concluded that the areas referred to in the table below carry a higher inherent risk of modern slavery.

Inherent risk	Nature of risk
 Fuel shipping	There is a risk that vessels used for the transport of fuel could expose crew to forced labour or unacceptable working conditions.
 Personal protective equipment and uniforms	There is a risk that the apparel industry could be associated with vulnerable populations in higher-risk geographies.
 Business admin and IT equipment and services	There is a risk that the original source material to manufacture IT equipment is linked with modern slavery practices.
 Cleaning and catering	There is a risk that the nature of the services could be associated with vulnerable sectors of the worker population.
 Biofuels supply	There is a risk that feedstocks used in the biofuels supply chain could be associated with vulnerable populations in higher-risk geographies.

Given the higher inherent risk, there was an increased focus on the areas in the above table with 15 key suppliers providing services in the areas referred to above included in the list of 101 suppliers who completed the externally prepared survey.

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5. Actions taken to assess and address risks

Viva Energy's approach to managing modern slavery risks across its operations and supply chains is based on improving its capability (on a company-wide basis) to identify, assess and address modern slavery risks. The key actions undertaken during 2021 in that regard are set out below.

5.1 Supplier engagement



Improving understanding of suppliers

In 2021, Viva Energy focused on gaining a better understanding of the potential risks of modern slavery through its key suppliers.

An important step in this process was the engagement of ethiXbase, which has developed a survey in conjunction with the law firm Norton Rose Fulbright. The survey is aimed at assessing the level of potential modern slavery risk through Viva Energy's supply chains by asking questions which enable a better assessment of whether the supplier's profile in the following areas raise any flags for further review:

1. The nature of the supplier's activities which underpin the supply arrangements.
2. The geographies in which the supplier operates to source products and services supplied to Viva Energy.
3. The composition of the supplier's workforce.
4. Policies and systems underpinning the supplier's approach to human rights and worker health and safety including the level of training in key areas which may help identify modern slavery risks.

In accordance with the process described in section 4.1 of this Joint Statement, Viva Energy identified and received responses from 101 'key' suppliers.

The conclusion of the survey responses was that Viva Energy has an overall low risk of modern slavery through its supply chain. This is consistent with our observations in section 4.2 of this Joint Statement. Despite this, as would be expected across such a large supplier base and where we have tested in some detail 101 suppliers, the responses to the survey from certain suppliers have raised flags for further follow up.

We have commenced engagement with flagged suppliers focusing on those with the greatest number of the attributes referred to above. Based on survey conclusions and our follow up work, there are no suppliers who are considered high risk based on the criteria above. This includes the 15 suppliers providing products and services highlighted in section 4.3 as being inherently higher risk.

Through the 2022 year, we will continue to engage with suppliers to better understand their survey responses. One area we will pursue as part of this process will be to complete a knowledge share with all key suppliers who do not have a mature training/compliance program to better equip them to understand and identify modern slavery risks.

Supplier compliance

In 2021, Viva Energy continued to build on its procurement processes with a view to driving positive change in addressing modern slavery risks through its suppliers. These steps included:

- Requiring prospective suppliers to provide a summary of their modern slavery compliance where participating in a Viva Energy tender process.
- Adding a modern slavery compliance question to the process for on-boarding new suppliers.
- Adding a detailed modern slavery compliance clause to standard terms and conditions for the procurement of goods and services.

In addition, all 101 suppliers that responded to the supplier survey were required to confirm that they had read and agreed to our new Supplier Code of Conduct (see section 5.2 below) (**Supplier Code**). The Supplier Code sets out Viva Energy's expectations of suppliers with whom it does business, including in relation to addressing modern slavery risks.

Ship vetting approach – case study

Most of Viva Energy's fuel shipping requirements are co-ordinated through vessels chartered by the Vitol Group (**Vitol**). Viva Energy has a long term relationship with Vitol as its supplier of crude oil and vessel chartering services, and Vitol is also a key shareholder in Viva Energy. Shipping is a key activity for Vitol and it considers the welfare of seafarers of paramount importance.

On top of the work undertaken by Vitol in this space, the vessels and crew are all individually vetted by Viva Energy in accordance with the INTERTANKO vetting process. This is also the case for vessels used by Viva Energy, which are not co-ordinated by Vitol.

Throughout the vetting process, proposed vessels are scrutinised against a stringent set of requirements.

The vetting process has evolved with changing state and port requirements in response to COVID-19, and Viva Energy has been able to adapt fuel supply programs without major impact or incident.

A detailed deep dive outlining the work undertaken by both Viva Energy and Vitol has been included in the case study on the next page.

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5. Actions taken to assess and address risks continued

5.1 Supplier engagement continued

The applicable checks which Viva Energy undertakes are summarised in the table below:

Checks	Description
Sanctions checks	Each vessel undergoes a screening of both the operator and vessel owner for any existing or historical sanctions.
Labour convention ITF checks	Viva Energy ensures that each vessel holds a current Maritime Labour Convention (MLC) certificate, International Transport Workers' Federation (ITF) agreement or equivalent. Australia is a signatory to the MLC, which consolidates existing labour conventions and introduces modern standards for the working and living conditions of seafarers. The aim is to ensure that living conditions, employment, salary and other related items meet required standards.
Crew tenure checks	At all times Viva Energy requires vessels used to meet Australian Maritime Safety Authority (AMSA) requirements for tenure as per Marine Notice 17/2016. This marine notice sets out AMSA's approach to implementing MLC requirements for the maximum continuous period that a seafarer can serve on board a vessel without taking leave. Any vessel which does not comply with this requirement, or will be in breach during the proposed term of use, will not be accepted without an approved repatriation plan.
OCIMF inspection reports	Every vessel is assessed against the Oil Companies International Marine Forum (OCIMF) inspection reports. The OCIMF was formed to lead the global marine industry in the promotion of safe and environmentally responsible transportation of crude oil and oil products by developing best practices in the design, construction and safe operation of tankers. One of the most significant safety initiatives introduced by OCIMF is the Ship Inspection Report Programme (SIRE) which is a very large database of up-to-date information about tankers and barges which is used by prospective users to better ascertain whether vessels are well managed and maintained. SIRE reports include details relating to safe operations, safety measures on board, crew manning/tenure and state of accommodation and living areas on vessels.
PSC inspections	Port State Control (PSC) inspections are reviewed for every vessel. While in an Australian port, a ship may be subject to inspection. If the ship is found to have deficiencies in meeting MLC requirements, it may be detained until the issue is resolved. Historical reports are kept for ships detained in Australian ports and Viva Energy reviews reports for a period of 12 months prior to vessel use. These inspections identify any issues with compliance including unsatisfactory crew conditions. Recent PSC reports have detained vessels for not doing enough to manage fatigue of crew, not being able to evidence payment in accordance with the MLC and not being able to evidence the provision of food of appropriate quality, nutritional value and quantity that meets the needs of the crew taking into account the differing cultural and religious backgrounds onboard.
Additional COVID-19 vessel declaration	Additionally, Viva Energy requires each vessel to provide a health declaration, covering previously visited ports, crew changes both previous and planned, the vessel's documented COVID safe crew change plan, and a declaration from the vessel master that the crew remains in good health and all visitors to the vessel wear appropriate protective personal equipment at all times. These requirements are consistent with protocols established by State Governments. By way of example, Western Australia has implemented stringent measures on vessel owners, charterers, masters and the shipping industry generally to support the rights of international seafarers to join and leave vessels as per their contractual rights and to receive timely medical treatment, including treatment related to disease, on arrival at a Western Australian port.

Vitol approach

Viva Energy liaises extensively with Vitol, which charters most of the vessels for shipping crude oil and finished products on behalf of Viva Energy. Vitol publicly declared its approach to the welfare and wellbeing of seafarers in its ESG Report 2020. This includes a proactive approach to looking after the welfare and happiness of crews including the following measures:

- Introducing Seafarer Happiness Indexes to enable Vitol to benchmark happiness vs the industry. Based on this work, Vitol has concluded that its seafarer happiness is higher on every metric than the industry average.
- Improving broadband access to enable crews to communicate more regularly with family and friends.
- Increasing the level of entertainment and activities onboard vessels.
- Deviating vessels and chartering private flights to facilitate crew changes to ensure, wherever possible, protection of the mental and physical wellbeing of crew.

Further, Vitol is a signatory to the 'Neptune Declaration of Seafarer Wellbeing and Crew Change', which is a global initiative of the Global Maritime Forum, together with the International Transport Workers Federation and the World Economic Forum pursuant to which owners, operators, ship managers and charterers have declared their intent in relation to four key issues with respect to crew wellbeing:

- Recognise seafarers as key workers and give them priority access to COVID-19 vaccines.
- Establish and implement gold standard health protocols based on existing best practice.
- Increase collaboration between ship operators and charterers to facilitate crew changes.
- Ensure airline connectivity between key maritime hubs for seafarers.

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5. Actions taken to assess and address risks continued

5.2 Reviewing and improving policies

Every member of Viva Energy's workforce is required to comply with Viva Energy's Code of Conduct, which confirms our aim to conduct business in a way that supports fundamental human rights. Viva Energy also has a standalone Human Rights Policy, which specifically refers to modern slavery and which seeks alignment with respect to our human rights commitments by Viva Energy's employees and contractors, along with suppliers, customers, business partners and the communities in which Viva Energy operates.

Building on this, during 2021 Viva Energy sought to place a greater emphasis on ensuring its suppliers share similar values by publishing a Supplier Code of Conduct. The Supplier Code sets out Viva Energy's expectations of suppliers with whom it does business. The Supplier Code states that Viva Energy's suppliers have a responsibility to:

- Ensure that they comply with all relevant laws and regulations relating to labour and human rights, including modern slavery.
- Have in place procedures to identify, investigate and take action in relation to any occurrence of modern slavery, including human trafficking, slavery, forced labour or child labour.

All of the above policies can be found at <https://www.vivaenergy.com.au/our-company/corporate-governance>.

5.3 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 2021 Viva Energy continued the rollout of its compulsory modern slavery training program for all senior leaders and staff with responsibility for managing external supplier procurement.

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. At the end of the module, staff are provided with checklists that they can download to assist with their work in identifying a potential modern slavery risk.

Viva Energy expanded the coverage of the training module in 2021 to include:

- New hires with senior leadership roles or responsibility for managing external supplier procurement.
- An expanded team of workers with responsibility for people management and Viva Energy's program for transporting crude oil and finished products.

The training has been undertaken by 185 of our staff representing over 13% of Viva Energy's workforce. We consider that this provides strong coverage for those workers who may be exposed to modern slavery 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.

5.4 Processes for incident reporting

Viva Energy has a published Whistleblower Policy which encourages employees, contractors and suppliers to raise any concerns where there are reasonable grounds to suspect that illegal, fraudulent, unethical or socially irresponsible conduct has occurred, which includes a breach of the Code of Conduct or other policies of Viva Energy including the Human Rights Policy and Supplier Code. This includes concerns about potential incidents of modern slavery.

The Policy details the right to disclose information confidentially, anonymously and without the fear of reprisal. More information on the Policy can be found at <https://www.vivaenergy.com.au/our-company/corporate-governance>.

Viva Energy engages an independent third party to operate the whistleblower reporting service. This service is (and has been) used to receive, process and address complaints. During 2021, there were no complaints received through this mechanism related to modern slavery.

5.5 Consultation with entities Viva Energy owns or controls

Viva Energy takes a Group-wide approach to risk identification and management, with overarching policies, systems and processes designed to be consistently applied across the Group.

Having said that, the risk is not entirely uniform across all entities given the nature of operations and supply chains are not identical for each entity. However, any differences are not considered to be material given the group-wide approach. It is noted that the risks in the operations and supply chains of the Liberty Oil and Westside Petroleum businesses should not be materially different than those previously articulated in this Joint Statement for the following reasons:

- The Liberty Oil and Westside Petroleum entities acquire their fuel almost entirely from Viva Energy.
- Those entities likewise acquire their non-fuel services almost entirely from Australian-based suppliers, which employ workforces subject to significant regulation.

As a result of these conclusions, the same analysis applies to all of the reporting entities covered by this Joint Statement along with each of their controlled entities.

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5. Actions taken to assess and address risks continued

5.6 Impact of COVID-19



The COVID-19 pandemic has created new and heightened modern slavery risks for businesses. This may include: (i) needing to engage with new suppliers to ensure continuity of provision of materials or to satisfy higher or lower than usual demand; (ii) changes to supply or payment terms affecting the cash flow of suppliers; (iii) restrictions on the ability to thoroughly audit suppliers; and (iv) a greater likelihood that vulnerable workers may be exploited in the COVID-19 impacted environment.

The key focus of Viva Energy during the pandemic has continued to be the protection of the welfare of Viva Energy's workforce while ensuring business continuity. The effect is that

our workplace processes have become even more robust and stringent to ensure we meet government health requirements, and even though a large number of employees worked from home for large periods through 2021, all induction processes have continued with the same rigour. To ensure continuity of business, we have worked closely with suppliers to understand the impact of COVID-19 on their business and assist them in managing those impacts where possible.





As a result of Viva Energy's response to the impact of the COVID-19 pandemic on its business, we do not believe that the modern slavery risk position for Viva Energy has changed materially as a result of the pandemic.

In addition, we refer to the more extensive work undertaken during the year to understand the impact of the COVID-19 pandemic on the wellbeing of crews on vessels used by Viva Energy to transport crude oil and finished products (see case study in section 5.1).

5.7 Looking forward

Viva Energy has made a deliberate effort to take clearly defined, targeted action in each reporting period to maintain continuous improvement in its work to address modern slavery risks in its supply chains and operations.

The table below sets out the phases that Viva Energy has undertaken to date, and will progress through in its modern slavery work in the coming years.





Year	Phase	Actions
1	 Foundation	<p>The First Statement was aimed at establishing Viva Energy's framework for action to address modern slavery risks.</p> <p>The First Statement included a targeted analysis of a small group of key suppliers aimed at developing a better understanding of Viva Energy's modern slavery risks. This helped inform the appropriate basis for future action to address modern slavery risks.</p> <p>In the foundation year, Viva Energy also commenced the process of establishing a culture of awareness and understanding of modern slavery risks through training and awareness-raising activities, along with introducing modern slavery considerations into procurement activities.</p>
2-3	 Discovery	<p>In 2021, Viva Energy shifted its focus to increasing its visibility, awareness, and understanding of modern slavery risks in a more targeted manner.</p> <p>This included an analysis of a wider group of key suppliers aimed at increasing visibility and awareness of where modern slavery risks may arise. This also included questions aimed at understanding risks further up the supply chains of Viva Energy's key suppliers.</p> <p>Next year, Viva Energy will undertake further work to improve its understanding of risks beyond its group of 'Tier One' suppliers.</p> <p>During this phase, Viva Energy is also further building on establishing a culture of awareness and understanding of modern slavery risks, along with looking at opportunities to embed modern slavery considerations into all procurement activities.</p>
2-4	 Implementation	<p>Informed by the supply chain mapping and risk assessments currently being undertaken, the next phase will involve taking action to address any findings made during the Discovery Phase. The Implementation Phase will necessarily overlap with the Discovery Phase as Viva Energy will take action to strengthen its modern slavery response as soon as possible (and will not wait until the full completion of the Discovery Phase before taking such action).</p> <p>This may include further mitigation strategies and targeted action with respect to suppliers considered to be higher risk.</p>
5	 Review	<p>At the end of the current cycle in year 5, Viva Energy will consider the overall effectiveness of its approach to addressing modern slavery risks and commence planning for the next cycle.</p>

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5. Actions taken to assess and address risks continued

5.8 2022 Focus Areas





In 2022, Viva Energy is focused on completing the Discovery Phase through the following focus areas:

Focus area	Key actions
 <p data-bbox="317 595 475 701">Increasing supplier engagement – due diligence</p>	<p data-bbox="523 495 1401 577">Targeting completion of the due diligence on key suppliers commenced during 2021. The responses obtained from the supplier surveys will be analysed and used to inform next steps.</p> <p data-bbox="523 595 1409 674">It is expected that further questions will be asked of certain suppliers who participated in the survey in 2021. This is likely to involve questions aimed at better understanding the supply chain beyond the 'Tier One' supplier (i.e. further up the chain).</p> <p data-bbox="523 692 1437 797">Additionally, an expanded group of suppliers will be asked to participate in the survey, either because they are new key suppliers of Viva Energy, or because it is considered that there are potential modern slavery risks to be assessed based upon our evolving understanding of modern slavery risks across Viva Energy's operations and supply chains.</p>
 <p data-bbox="317 887 488 992">Increasing supplier engagement – implementation</p>	<p data-bbox="523 808 1449 898">Informed by the supply chain mapping and risk assessments currently being undertaken, we will commence taking action to assist any suppliers who may benefit from Viva Energy's assistance in order to reduce their modern slavery risk profile.</p> <p data-bbox="523 916 1445 1048">This may include exploring opportunities to collaborate on training or sharing the findings of our work through the Discovery Phase with relevant suppliers, with a view to helping them build their own internal capability to identify modern slavery risks. This may be particularly beneficial for smaller suppliers who do not presently have a mature modern slavery training or compliance program.</p>
 <p data-bbox="317 1178 488 1234">Building culture and awareness</p>	<p data-bbox="523 1061 1409 1151">Continuing to develop Viva Energy's internal capability to identify modern slavery risks through enhancing the understanding of modern slavery risks and the ability to detect potential risks at an operational level.</p> <p data-bbox="523 1169 1437 1247">On top of the existing compulsory training program, further steps will be taken to ensure broader awareness and understanding of risks across Viva Energy. This may take the form of a Townhall-style presentation to the whole company.</p> <p data-bbox="523 1265 1449 1344">In addition, based on our learnings from the supplier survey responses, we will look for opportunities to workshop practical outcomes with staff members including any additional deep dives considered appropriate.</p>
 <p data-bbox="317 1391 459 1447">Increased collaboration</p>	<p data-bbox="523 1359 1406 1458">Viva Energy will explore opportunities to exchange information and identify opportunities for collaboration with other entities to expand on our existing learnings, and improve leverage.</p>

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6. Assessing the effectiveness of actions taken

Viva Energy will assess the effectiveness of our modern slavery risk management program on a regular basis by using the following performance indicators throughout 2022.

Performance indicator	Measure
 Increasing supplier engagement – due diligence	Completion by all key suppliers of surveys issued to them, and analysis of results by Viva Energy.
 Increasing supplier engagement – implementation	Identifying and completing a knowledge share with all key suppliers who do not have a mature training/compliance program to better equip them to understand and identify modern slavery risks.
 Building culture and awareness	Holding a company-wide session to assist in developing awareness of modern slavery risks. Sharing of practical outcomes of supplier surveys with operational staff.
 Increased collaboration	Sharing of outcomes with other entities in the industry through bilateral collaboration and/or broader modern slavery forums.

Approval

This Joint Statement was approved by the Board of Viva Energy Group Limited following review by the directors on 17 March 2022.