



## EG Australia Modern Slavery Statement

For the Financial Year Ending 31 December 2024

This Modern Slavery Statement (**Statement**) has been prepared in accordance with the requirements of the *Modern Slavery Act 2018* (Cth) (the **Act**). This Statement covers EG Group Australia Pty Ltd ACN 629 792 810 and its related bodies corporate including, EG Fuelco (Australia) Limited ACN 627 348 645 (together, **EG Australia, we or us**).

This Statement was approved by our Board of Directors on **23 June 2025** and signed by our Chief Executive Officer in accordance with the Act.

### 1. Our Structure, Operations and Supply Chains

The EG Australia companies are subsidiaries of EG Group Limited, a UK-headquartered global convenience retailer operating approximately 6,000 sites across the UK, Europe, Australia, and the USA. Within Australia, EG Australia owns and operates 525 fuel and convenience sites and employs over 4,000 people nationwide.

EG Australia employs more than 80% of our staff directly under permanent contracts, significantly reducing the risk of modern slavery within our core operations. We do, however, engage with third-party contractors for certain services. While we do not control these employment arrangements, we continue to work closely with partners to promote full compliance with applicable laws, including modern slavery legislation.

We are pleased to report that since submitting our first Modern Slavery Statement, we have not been made aware of any modern slavery practices within our operations or supply chains.

Our supply chain includes both trade and non-trade suppliers, the majority of which are Australian-based. We expect our suppliers to uphold ethical and lawful business practices aligned with our policies, and we communicate these expectations through



agreements, due diligence protocols, and our publicly available Code of Conduct and Speak-Up Policy.

## 2. Governance and Policies

We maintain a suite of policies and procedures to help manage and mitigate modern slavery risks:

- **Responsible Sourcing Policy:** This policy demonstrates our dedication to conducting business ethically and with integrity. It reinforces our commitment to preventing modern slavery within our operations and supply chain. The policy sets out the measures EG Australia must take, including conducting due diligence to identify and reduce modern slavery risks, incorporating relevant clauses into supplier contracts, and providing training to employees involved in procurement and sourcing. Each member of our executive team is responsible for overseeing and assessing the policy's implementation and effectiveness within their respective areas.
- **Code of Conduct:** This policy outlines behavioural standards for all employees. Our Code of Conduct states that we expect all team members to maintain high standards, and to speak up and provide feedback when they see activity or behaviour that they feel is wrong or does not match our ways of working.
- **Speak-Up Policy:** This policy sets out the procedure for our staff to speak up confidentially to raise genuine concerns about misconduct in our business or operations without fear of reprisal, and includes an external reporting hotline for our staff and suppliers to use. It provides a confidential mechanism for reporting misconduct, including modern slavery risks.

## 3. Identifying Modern Slavery Risks

We recognise that modern slavery risks are heightened where:

- service providers use engage low-skilled, seasonal or migrant labour;
- products or services are sourced from high-risk countries;
- there are poor governance structures within the organisation;
- there are poorly managed procurement or auditing processes; and
- there is a lack of awareness and training regarding modern slavery within the organisation.



Following internal consultation, we have identified elevated risk in the areas of construction and maintenance, and in products such as coffee sourced from overseas.

We are not aware of, nor have any reason to suspect there are, any instances of modern slavery in our supply chain. We intend to continue to assess and monitor suppliers that fall within the potential risk areas in our extended supply chain to ensure that there are no instances of modern slavery.

#### 4. Actions Taken During FY2024

EG Australia has taken the following measures to help identify and minimize the risks of modern slavery in our operations and supply chain:

- *Employee training:* We have continued our modern slavery training program to ensure key employees in our business have an awareness and understanding of modern slavery risks. All of these employees have successfully completed training and we will continue to expand this program going forward.
- *Contractual Terms:* As reported in last year's statement, we have updated the terms of our standard vendor agreements to include a more comprehensive modern slavery clause. This clause goes beyond an obligation to simply comply with applicable laws, and requires vendors to complete a modern slavery due diligence questionnaire, provide warranties that they are not aware of any modern slavery practices within their supply chain or operations, and promptly notify us if they become aware of any such modern slavery practices. In 2024 we worked to transition more suppliers onto these new terms and ensured that a similar modern slavery clause was included in third party contracts we entered into.
- *Modern Slavery Questionnaire:* Most of our business partners and suppliers have completed self-assessment modern slavery due diligence questionnaires, provided us a copy of their modern slavery statement and/or warranted that they are not aware of any risks of modern slavery practices within their own supply chain or operations. We continued to require this information to be provided when engaging new suppliers during 2024.



- *Mandatory Vendor Due Diligence:* We have continued to conduct new vendor due diligence and integrity checks to identify any risks in the request for tender and procurement process, including requiring our large suppliers to provide their own Modern Slavery Statements for our review. We are working to finalise a new mandatory modern slavery checks within our vendor management processes and our agreement execution protocol. This will be implemented in 2025.
- *ESG Questionnaire:* We have completed an ESG Questionnaire coordinated by EG Group which incorporates modern slavery due diligence questions. We completed this questionnaire for 2024 and provided supporting evidence and calculations to EG Group for all data included in our responses. The aim of this questionnaire is to monitor and ensure continued improvement in environmental, social and governance matters across the EG Group, including in relation to modern slavery.

## 5. Assessing Effectiveness

Throughout the year we evaluate the effectiveness of our approach to managing modern slavery risks by:

- monitoring our whistleblower mechanisms for any reports of suspected modern slavery. We are happy to report that none were received in 2024 but will continue to educate our staff and encourage them to come forward if they have any concerns;
- reporting on complaints, potential trends, and risk areas to the Speak-Up Committee and the Board;
- reporting on EG Australia's performance on Environmental, Social, and Governance (ESG) matters in connection with EG Group's ESG reporting and governance frameworks;
- reviewing and conducting training to maintain awareness within our organisation; and
- publicly communicating this Statement so our employees and suppliers have a clear understanding of our policies, expectations and future commitments to reduce the risks of modern slavery.

## 6. Future Commitment to Continuous Improvement

We are committed to continuing to improve our modern slavery risk assessments and monitoring procedures throughout our business. In 2025, we plan to:



- Finalise and roll out a new mandatory modern slavery check within both our new vendor on-boarding and agreement execution procedure.
- Extend our modern slavery training to a broader group of employees throughout the business, increase the frequency of this training and mandate completion.
- Continue to transition existing suppliers to our updated terms which incorporate our new standard modern slavery contractual terms.
- Continue to assess the potential modern slavery risks in our operations and supply chains with emphasis on high risk geographical locations and sectors.
- Continue to work with EG Group to complete our annual ESG Questionnaire which incorporates modern slavery due diligence questions.
- Continue to require new vendors to complete our modern slavery questionnaire and/or provide a copy of their modern slavery statement, and work towards having all existing vendors provide this information.

## 7. Consultation Process

This Statement reflects the position of EG Australia. All entities of EG Australia operate under a common set of policies and programs relating to modern slavery.

In implementing EG Australia's modern slavery compliance program, we have continued to consult with key stakeholders across the business. In addition, prior to approval by the Board, this Statement was reviewed by the executives of EG Australia who are responsible for the overall management of the EG Australia business.

Signed for and on behalf of EG Australia:

Signed by:  
  
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**Carolyn Morley**

Chief Executive Officer

EG Australia

23-Jun-2025