

# Modern Slavery Statement 2025



# Introduction

## Reporting Entities

This is a joint Modern Slavery Statement, made pursuant to the *Modern Slavery Act 2018 (Cth) (Act)*, for the financial year ended 31 December 2025, covering the following entities that meet the definition of reporting entities in the Act:

- Ampol Limited (ACN 004 201 307);
- Ampol Australia Petroleum Pty Ltd (ACN 000 032 128);
- Ampol Retail Pty Ltd (ACN 000 175 342);
- Ampol Petroleum Distributors Pty Ltd (ACN 005 632 860);
- Ampol Property Trust (ABN 41 830 779 954); and
- Ampol Energy (Wholesale Trading) Pty Ltd (ACN 660 016 062).

This Modern Slavery Statement identifies the steps taken in relation to modern slavery by the reporting entities, and the entities wholly owned or controlled by them (together, for the purposes of this statement, "Ampol Group" or "Group"). Throughout this statement terms such as "Ampol" and "we" have the same meaning as Ampol Group, unless the context requires otherwise.



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## Message from the Managing Director and CEO

We all have a role in eliminating all forms of modern slavery, and Ampol has continued to play its part in this important work in 2025.



I am proud to present Ampol's 2025 Modern Slavery Statement, which outlines the actions taken during the year to identify, assess and address modern slavery risks across our operations and supply chains.

Modern slavery remains a complex and evolving risk, influenced by geopolitical, economic and industry-specific factors. Ampol recognises that effective risk management in this area requires a structured, risk-based approach, supported by clear governance, due diligence processes and ongoing oversight.

This fifth Modern Slavery Statement describes the progress made in strengthening our systems and practices during 2025. Key areas of focus have included enhancing our supplier engagement and screening processes, improving the quality and consistency of supplier site assessments, and further aligning approaches across the Ampol Group, particularly with Z Energy in New Zealand.

During 2025, 86% of Australian-based Ampol suppliers by spend completed the Supplier Code of Conduct questionnaire, exceeding our minimum target. The Code sets out Ampol's expectations of itself and its counterparties in relation to labour and human rights. The questionnaire plays a key role in our due diligence processes by enabling us to obtain relevant information from proposed suppliers and identify any gaps in their ability to meet those expectations.

We also expanded the use of modern slavery risk screening tools across the Group, and embedded updated internal standards to improve visibility and consistency in supplier risk assessment. The introduction of a structured site-visit checklist across the Australian supply chain further supported a shift from volume-based assurance activities to more targeted assessments.

Focusing on risk areas associated with vulnerable worker groups was a continued priority in 2025. We conducted ongoing audits of dealers and distributors, expanded access to grievance mechanisms for workers outside Ampol's direct employment, and saw the first full year of operation of the Dealer Code of Conduct that operates to strengthen expectations and accountability across our Australian dealer network.

Ampol recognises that addressing modern slavery risk is an ongoing and dynamic process. We remain focused on maintaining and continuously improving our governance frameworks, due diligence processes and engagement with suppliers and stakeholders to support ethical business practices across our operations.

**Matthew Halliday**

Managing Director and CEO





## Our progress in 2025

In Ampol’s 2024 Modern Slavery Statement, we made commitments on behalf of our joint reporting entities to address the risks of modern slavery during 2025. These commitments were set out as *Future Actions* and included commitments to continue certain initiatives, or to create new initiatives for delivery in 2025.

### Our progress against our prior year commitments:

- In 2025, Ampol will conduct the two-yearly review of the Ampol Group Modern Slavery Risk Assessment and Mitigation Standard. ●
- In 2025, Z Energy will adopt the Ampol Group Human Rights Policy, enabling a uniform approach to modern slavery across the Group. ●
- In 2025, Z Energy will progress a project which relates to how it procures uniforms across its retail network. ●
- Ampol will continue to require a minimum of 80% of Australian suppliers (measured by spend) to complete the Australian Supplier Code of Conduct (**SCoC**) Questionnaire. ◐
- Ampol will continue to transition existing suppliers, upon renewal of contract, to the current modern slavery contract terms. ◐
- During 2025, Ampol will extend use of the supply chain risk management system, Fair Supply, to its retail modern slavery program in Australia. ●
- In 2025, Ampol will develop a specific site visit checklist for Ampol representatives when conducting Australian supplier site visits, where such visits will be prioritised by the results of the Fair Supply risk ratings. ●
- The Modern Slavery Risk Assessment will continue to be mandatory for all new suppliers in Australia. Ampol will continue deep dives on suppliers, as assessed by risk identified with the benefit of new platforms and tools. ◐
- In 2025, Ampol will continue to audit at least 10% of its Australian distributors and 10% of its Australian dealers (non company-controlled sites) for workplace compliance in Australia. ●
- During 2025, Ampol will take steps to further communicate the Australian Dealer Code of Conduct, and consider mechanisms to ensure dealers read and accept the terms of the Code. ●
- In 2025, Ampol will continue its Marine Assurance Program (see the Ampol 2023 Modern Slavery Statement for detail on the program). ◐
- By the end of 2025, Ampol will have rolled-out facilitated training sessions on the whistleblower grievance mechanism to senior employees, which includes ongoing whistleblowing training to the Ampol Board. ●
- During 2025, Ampol will continue to apply the modern slavery training module as a mandatory Group compliance topic for identified leaders or decision-makers who may be in a position to make a difference consistent with Ampol’s modern slavery objective. ●
- Ampol will continue to seek and identify additional opportunities to collaborate with others and participate in modern slavery forums. ◐

● Complete ◐ Ongoing

### Ampol Group supply chains as at 31 December 2025

Suppliers\*

2,968

Australian suppliers

93%\*\*

Representing AUD \$6.21b spend\*\*\*

International suppliers

7%\*\*

AUD spend

\$10.157b

In addition to the above, Z Energy total procurement spend (excluding imported fuels) was approximately NZD \$249.1m from over 600 suppliers.

\* Suppliers represent third-party providers that Ampol traded with during 2025, across Fuels and Infrastructure and Convenience Retail supply chains.

\*\* Percentages based on total number of suppliers.

\*\*\* Approximate third-party spend excluding taxation, government charges and intercompany transactions.

## Our approach to modern slavery risk



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

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

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

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

Ampol's approach to risk management, including how we address modern slavery risk, is further outlined in our CGS. Modern slavery risk is formally recognised within the ARMF as a risk source under the Regulatory and Compliance material risk category. We routinely evaluate the effectiveness of our control measures to ensure they remain robust and responsive to changing conditions. Our current modern slavery control measures include:

- the Ampol Modern Slavery Statement;
- modern slavery training;
- the Ampol SCoC;
- the Ampol Modern Slavery Risk Assessment and Mitigation Standard;
- the Dealer Code of Conduct; and
- the site visit checklist.

### Risk management governance

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

### Three Lines Model

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

- **First line** – Operational managers address risks in their daily activities. They identify and escalate concerns related to modern slavery where relevant to their role, activity or supply chain interface, supporting timely and appropriate mitigation.
- **Second line** – Functions such as Risk, Compliance, Legal, Procurement and Treasury provide guidance, oversight, and support through Ampol's frameworks, standards and policies.
- **Third line** – Internal Audit provides independent assurance on the effectiveness of Ampol's risk management, compliance and control processes.

### Top-down, bottom-up approach

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

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

## Our approach to modern slavery risk continued


### Ampol Risk Management Framework

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

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

- **Monitoring** – We continuously assess the performance and robustness of our controls, refining them whenever necessary to ensure they remain effective.
- **Review** – The Ampol Board conducts an annual review of the overall risk management framework. This includes evaluating our modern slavery approach to confirm it meets Ampol's high standards of compliance and integrity.
- **Consultation and communication** – We engage with our employees, suppliers, industry peers and other stakeholders at every stage of the risk management process. This open dialogue fosters shared understanding and helps drive continuous improvement in modern slavery risk management.

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

 For further detail on our wider approach to environmental, social and governance matters, refer to our Sustainability Report within the [Ampol Annual Report 2025](#).

### Enhanced Compliance Program

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

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

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

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

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





## Our approach to modern slavery risk continued

### Integration of LexisNexis

LexisNexis is used to continuously monitor legislative amendments and to provide notifications of these changes for Core Topics, including those related to modern slavery. LexisNexis then feeds these updates directly into Ampol's Governance, Risk and Compliance platform E360. E360 (known as Evotix or Cintellate) is the internal system that Ampol has in place for risk management, incident management and compliance management. The integration of LexisNexis ensures that Ampol's obligations register reflects current legal requirements. Each updated obligation is assigned to the relevant Core Topic owner, who is responsible for confirming Ampol's compliance or initiating corrective actions if needed.

### Obligations register and compliance gap assessment

All core obligations, including modern slavery requirements, are captured and maintained in E360. During 2025, Ampol conducted a compliance gap assessment across the modern slavery topic to evaluate how effectively these obligations were being met. The review covered policies, training modules, supply chain due diligence, and other internal controls specific to modern slavery. The annual process confirmed no deficiencies in our compliance with modern slavery legislation and highlighted opportunities for further efficiency, such as aligning supplier screening processes.

### Governance, monitoring and continuous improvement

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

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

### Ampol Group Modern Slavery Risk Assessment and Mitigation Standard

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

The Standard was reviewed and updated in 2025. The next periodic review is due in October 2028. The key change arising from the 2025 review was an adjustment to the scope to reflect the adoption of the supply chain risk management platform, Fair Supply, by the Ampol Retail business in Australia. The document will be further reviewed and updated where there is feedback from the Ampol modern slavery working group or there is regulatory change informed by the compliance program.

### United Nations Guiding Principles on Business and Human Rights

We recognise our responsibility to avoid causing or contributing to modern slavery through our activities. We also recognise our responsibility to mitigate modern slavery risks that are otherwise linked to us, including through our supply chains. This responsibility requires us to have clear policies, due diligence and remediation processes. We have continued to prioritise our mitigation activities, considering the severity of the risk and our ability to influence outcomes.



## Our approach to modern slavery risk continued

### Collaborative approach

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

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



### Collaborative engagement with suppliers

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

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

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

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

## The Ampol Values underpin everything we do.

Ampol introduced new Group Values in 2025 to align with our refreshed strategy and unify the former Ampol and Z Energy Value sets. The new Group Values define who we are, guide our decisions, and shape our culture.

Following Group-wide consultation, we established three Values – **Move as one**, **Make it happen** and **Make it count** – each supported by clear behavioural expectations. These Values are now embedded into our Code of Conduct, onboarding, performance processes and everyday recognition.



### Move as one

We operate as one enterprise, manage trade-offs, and safety is always top of mind.



### Make it happen

We have bold goals that raise the bar and deliver on what matters.



### Make it count

We understand what matters most and adapt what we do to create value that lasts.

## Our structure

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

### Ampol Limited and the Ampol Group

Ampol Limited is listed on the Australian Securities Exchange (ASX) as the parent company of the Ampol Group, comprising approximately 81 controlled entities. For a full list of controlled entities, see Ampol's 2025 Annual Report.\*

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

### Subsidiary reporting entities

**Ampol Australia Petroleum Pty Ltd** (ACN 000 032 128) is a wholly owned subsidiary of Ampol Limited and the main operating entity for the Ampol Group.

**Ampol Retail Pty Ltd** (ACN 000 175 342) is a wholly owned subsidiary of Ampol Australia Petroleum Pty Ltd that operates Ampol's Convenience Retail business.

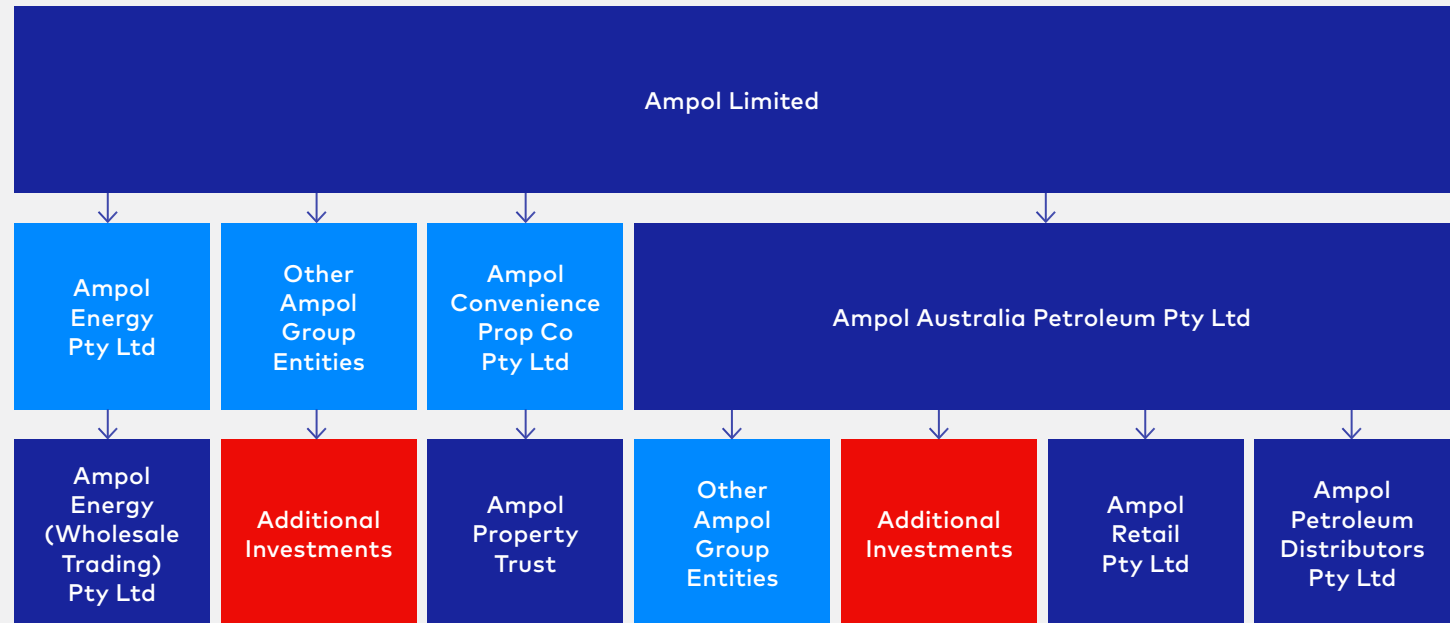
**Ampol Petroleum Distributors Pty Ltd** (ACN 005 632 860) is a wholly owned subsidiary of Ampol Australia Petroleum Pty Ltd that operates Ampol's national depot network and associated truck fleet within the Fuels and Infrastructure business.

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

\* Note F1 to the Financial Statements.

\*\* For the purposes of the reporting criteria under the *Modern Slavery Act 2018* (Cth), see Ampol Retail Pty Ltd content on pages 18–20 that should be taken to apply for the purposes of the Trust.

### Simplified structure chart



- Reporting entities (as defined in the *Modern Slavery Act 2018* (Cth)) making this joint Modern Slavery Statement.
- Owned and controlled entities covered by this joint Modern Slavery Statement.
- Additional investments not covered by this joint Modern Slavery Statement.

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

**Ampol Energy (Wholesale Trading) Pty Ltd** (ACN 660 016 062) is a wholly owned subsidiary of Ampol Energy Pty Ltd that operates Ampol's wholesale electricity business.

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

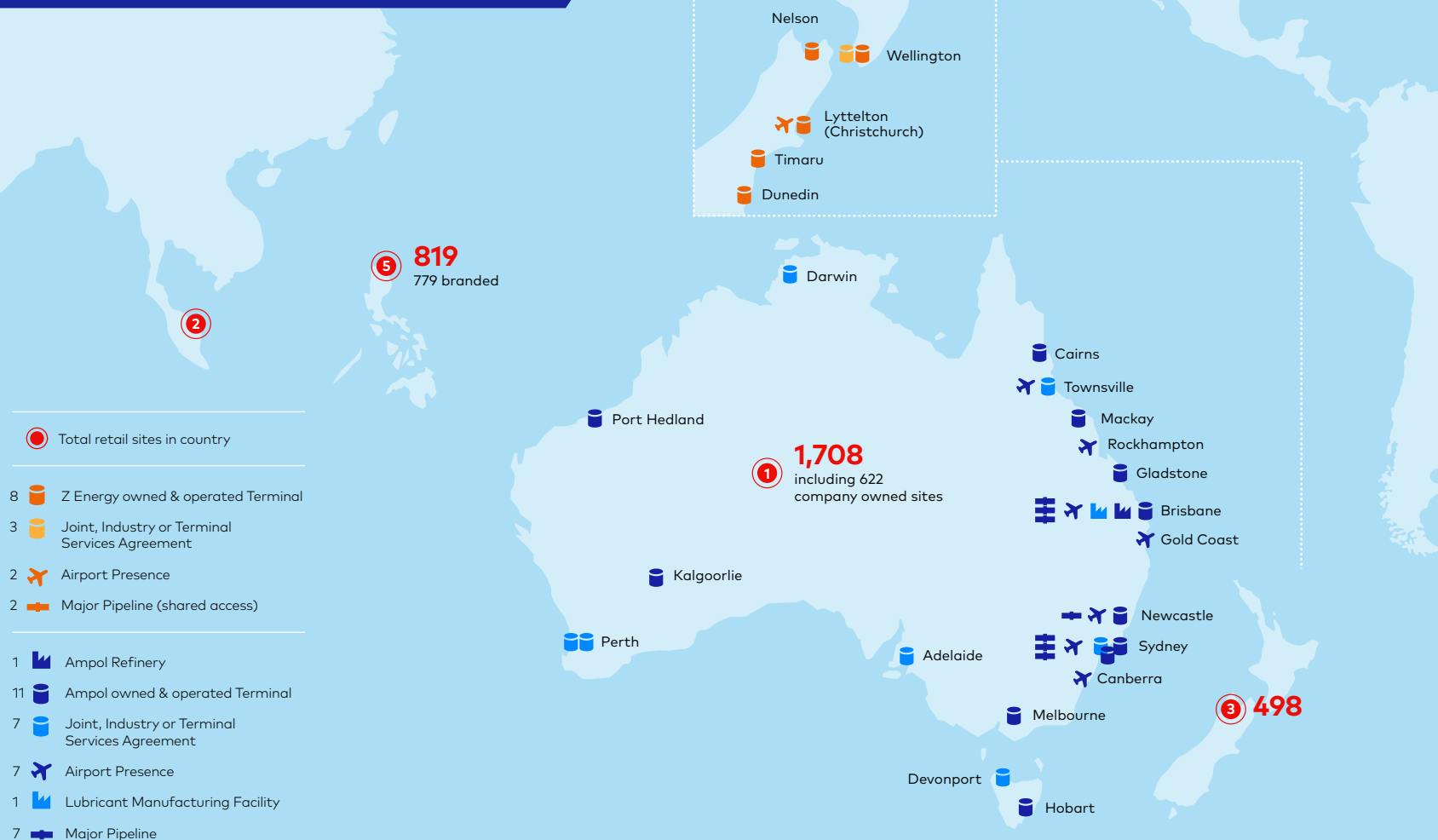
### Additional investments

During 2025, Ampol also held additional investments in a number of associates and joint ventures, as set out at Note F3.1 of Ampol's 2025 Annual Report. This statement does not cover actions taken by these associates and joint ventures that Ampol does not control.

## Our operations

### Powered by connection

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



- Total retail sites in country
- 8 Z Energy owned & operated Terminal
- 3 Joint, Industry or Terminal Services Agreement
- 2 Airport Presence
- 2 Major Pipeline (shared access)
- 1 Ampol Refinery
- 11 Ampol owned & operated Terminal
- 7 Joint, Industry or Terminal Services Agreement
- 7 Airport Presence
- 1 Lubricant Manufacturing Facility
- 7 Major Pipeline

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

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**1 Australia**  
Serving retail and business customers for over 100 years.

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

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**3 New Zealand**  
Owner of Z Energy, one of New Zealand's largest transport energy companies.\*

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**4 United States of America**  
Houston-based Trading and Shipping office, which commenced trading in October 2020.

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**5 Philippines (20% owned)**  
Strategic investment in Seoil.

\* On 20 March 2025, Ampol announced that its wholly owned subsidiary Z Energy had entered into an agreement to sell its approximately 12.67% shareholding in Channel Infrastructure.



## Our operations continued



# >8,900

employees across Australia, New Zealand, Singapore and the United States of America

# 11

Ampol owned & operated terminals

# 8

Z Energy owned & operated terminals

# >1,700

Ampol-branded sites in Australia

# 498

sites in New Zealand

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

Our ability to service our broad customer base is supported by our robust supply chain and strategic infrastructure positions. In Australia, this includes 11 Ampol owned & operated terminals, six major pipelines, 50 wet depots, more than 1,700 Ampol-branded sites (including 622 company owned retail sites as at 31 December 2025) and one refinery located in Lytton, Queensland.

In New Zealand, there are eight Z Energy owned & operated terminals and approximately 500 sites (including Z Energy, Caltex and U-GO branded sites).

The supply chain is supported by >8,900 employees across Australia, New Zealand, Singapore and the United States of America.

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

Over the past decade, we have been growing our international presence. The acquisition of Z Energy in 2022 has enabled our growth in New Zealand, where we remain fully focused on our segmentation strategy and continue the roll out of our electric vehicle (**EV**) charging network. Our Trading and Shipping teams also sit across Singapore and the United States (Houston), both areas being vital to our Trans-Tasman fuel supply chains. Our alliances, including with Seaoil in the Philippines, also form part of our strategy in broadening our fuel supply chains.

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

## Our operations continued

### Principal activities

#### Fuels and Infrastructure



~110,000

Business and SME\*  
customers across  
Australia and  
New Zealand

25.2BL

2025 total  
sales volume\*\*

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

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

Our capability in product sourcing, privileged infrastructure and network assets, coupled with our deep customer relationships, allow us to run an integrated business and to drive value from international sourcing through to wholesale supply of fuels and lubricants.

2025 saw the Lytton Refinery return to profitability (following a decline during the second half of 2024), with improved reliability, refiner margins and the successful turnaround and inspection of the Alkylation Unit. Production in the second half did slow down due to the impacts of Cyclone Alfred, global refinery outages (both planned and unplanned) and Russian sanctions disrupting crude and product flows.

Ampol has also been progressing the Ultra Low Sulfur Fuels project and has been supplying 10 ppm sulfur gasoline since December 2025, in accordance with Federal Government's mandate\*\*\*, with further plans to commence commissioning in the second quarter of 2026. We continue to work alongside the Federal Government in support of the national priority around fuel security to which our refining capability is important.

#### Convenience Retail



~4million

weekly retail  
customers across  
Australia and  
New Zealand

622

company-owned  
retail sites  
in Australia

1,708

sites in Australia's  
largest branded  
petrol and  
convenience  
network

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

Through new formats, products, technology and services, we are redefining what convenience means for Australians. Our national network of 622 company-owned sites (as at 31 December 2025) delivers customers a premium fuel and card offer through Amplify Premium Fuels and Ampol Card, with a growing convenience offer.

2025 saw Ampol continue the successful rollout of its Quick Service Restaurant (QSR) strategy through the Boost Juice and Hungry Jack's brands and more recently, the addition of the Soul Origin brand. Ampol remains the largest Boost Juice franchisee with 48 sites as at 31 December 2025.

\* SME refers to small- to medium-sized enterprises.

\*\* Across the entire Ampol business.

\*\*\* Note that the Federal Government issued temporary fuel quality standards in March 2026.



## Our operations continued

### Principal activities

#### Energy Solutions

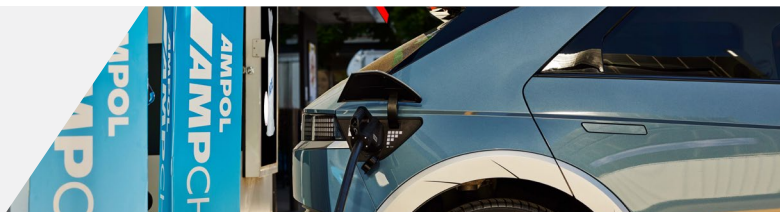
Our Energy Solutions business continues to play a key role in supporting customers through their mobility energy transition journeys.

The newly simplified business will focus on technologies that are closest to commercialisation, including:

- the continued rollout of the AmpCharge EV charging network at Ampol retail sites;
- the rollout of EV charging infrastructure at third-party sites; and
- home charging equipment.

The EV charging network as at 31 December 2025 included:

- 290 AmpCharge charging bays in Australia across 88 sites.
- 204 charging bays in New Zealand across 60 sites.



#### Simplification of Energy Solutions business

In May 2025, Ampol announced its intention to simplify its Energy Solutions business by exiting electricity retailing and focusing its efforts on out-of-home EV charging solutions and the supply of lower carbon liquid fuels\*. As part of this simplification, Ampol divested its retail electricity operations in Australia and New Zealand and ceased a number of other activities.

#### Continued expansion and focus on EV uptake

Following its strategic simplification during 2025, the Energy Solutions business has continued to expand and grow its network. Its growth is now more streamlined and focused towards its goal of supporting customers along their energy transitions, particularly through EV uptake. Ampol's aim is to build Australia's leading e-mobility brand, leveraging our position as one of the country's largest branded fuel and retail convenience networks.

In 2025, Energy Solutions' expansion was supported by several strategic alliances with third party developers that provide charging infrastructure able to be leveraged within our portfolio. Key collaborators included Stockland, Mirvac, ISPT, Charter Hall and Queensland Investment Corporation. These strategic alliances enable the Energy Solutions business to provide convenient and reliable charging options for our network of customers at third party locations, with additional infrastructure supporting charging options even where high traffic was experienced. Energy Solutions will continue to leverage strategic alliances towards its re-focused EV uptake priorities, particularly around the provision of convenient charging options at both Ampol Retail and third-party sites.

#### Renewable Fuels\*

The Brisbane Renewable Fuels project involves the exploration of lower carbon liquid fuels\* in Australia, including the potential to establish a production facility at the Lytton Refinery through the possible use of agricultural, animal and other waste feedstocks to produce renewable fuels for domestic and export use. The two key lower carbon liquid fuel options being considered for domestic manufacture are Sustainable Aviation Fuel (SAF)\* and Renewable Diesel (RD)\*.

In 2024, Ampol signed a Memorandum of Understanding with GrainCorp and IFM Investors to move Ampol's Brisbane Renewable Fuels project from feasibility study to the pre-FEED phase (front-end engineering and design).

During 2025, Ampol continued to progress the project and its evaluation of the potential of developing a lower carbon liquid fuels co-processing facility at the Lytton Refinery able to utilise lower carbon feedstocks and to blend into existing refinery products, in order to lower the emissions intensity of fuels manufactured by Ampol. The project is a collaborative effort seeing Ampol work alongside industry peers, investors and customers to develop the import supply chain required to support the early adoption of lower carbon liquid fuels by customers. The project's success also remains highly dependent on Government establishing suitable policy settings to enable the formation of the appropriate industry required. The project has now moved into the pre-FEED phase, with Ampol also trialling importing lower carbon liquid fuels to support customers looking to explore options for decarbonising their operations.

#### Wholesale electricity

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

\* Lower carbon liquid fuels and renewable fuels are industry terms used for liquid hydrocarbons made from non-petroleum based renewable feedstocks such as purpose grown biomass, or from waste material such as tallow or used cooking oil. It captures SAF and RD. Lower carbon liquid fuels and renewable fuels have the potential to lower fuel lifecycle emissions compared to traditional hydrocarbon fuels.

## Our operations continued

### Principal activities

#### Z Energy



~1 million

customers served each week across our service station network

8

Z Energy owned & operated terminals

Around 40%

of New Zealand's total bulk fuel storage held or accessible by Z

204

public EV charging bays across 60 sites

Z is one of New Zealand's largest transport energy companies, serving customers under the Z, U-GO and Caltex\* brands, and supplying and distributing fuel to commercial and wholesale customers.

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

During 2025 and as part of the broader Energy Solutions business simplification, Z Energy divested its retail electricity operations, selling the Flick business to Meridian Energy. The decision to simplify the Energy Solutions business in New Zealand (and Australia) has allowed increased focus on the mobility energy transition. Z Energy has continued to grow its domestic public charging network, enabling fast, convenient and reliable public EV charging sites to meet the needs of drivers now and into the future.

In 2025, Z Energy added a further 33 charging bays and seven additional sites.

In 2025, the New Zealand operations consisted of:

- approximately 500 sites (including Z Energy, Caltex and U-GO branded sites).
- ~1 million customers served each week across our service station network.
- eight terminals owned & operated by Z Energy, and 3 operated under a joint, industry or terminal services agreement.
- Z held or had access to around 40 percent of New Zealand's total bulk fuel storage.
- 204 public EV charging bays across 60 sites as at 31 December 2025.

33

new charging bays

7

additional sites added

\* Z licenses the Caltex brand in New Zealand.



## Our team

Employee engagement\*

79%

Employee net promoter score\*\*

38%

Female representation

42%

overall

30%

on the Ampol Ltd Board

42%

at senior leadership level

44%

on the Ampol Leadership Team

0.7% like-for-like gender pay gap in favour of males, and 11.4% overall gender pay gap in favour of males across all of our locations.\*\*\*

United States

9

Total employees engaged\*\*\*\*

8,916

Singapore

124

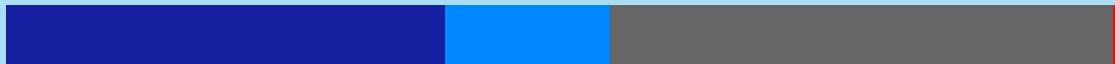
Australia

8,262

New Zealand

521

## Employment status



Full Time

3,493

Part Time

1,309

Casual

4,009

Fixed Term Contract

105

\* 'Employee engagement' measures how committed to, and enthusiastic employees are, about their work and the organisation. The Employee Engagement score is calculated by averaging each employee's response(s) to our four engagement questions within the last six months and then averaging across the workforce.

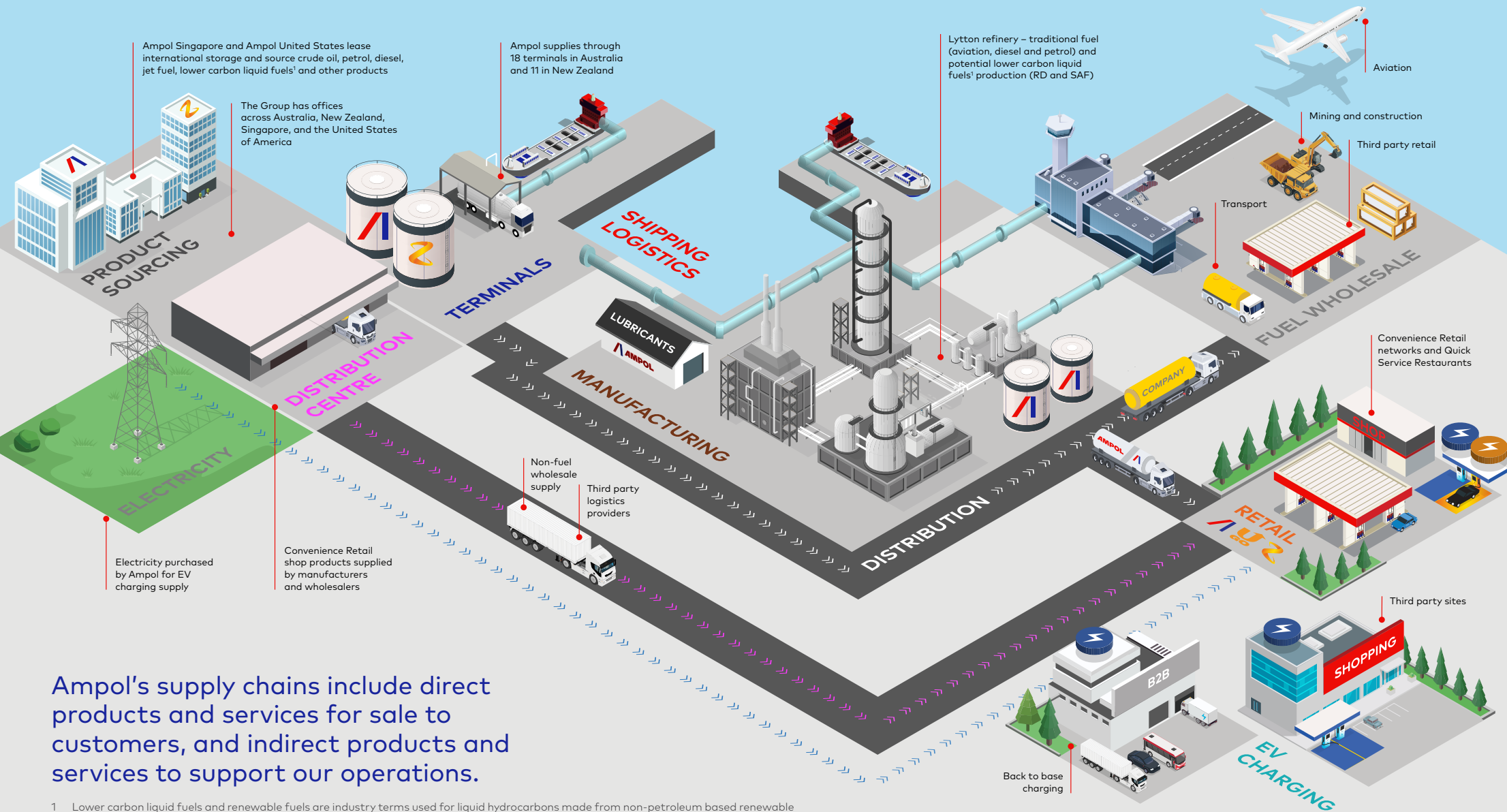
\*\* 'Employee net promoter score' is calculated by classifying each employee's average engagement score (above) as a promoter (9-10), passive (7-8), or detractor (0-6), then taking the percentage of promoters minus the percentage of detractors to produce a score ranging from -100 to +100. Our current score represents top quartile performance against internal benchmarks.

\*\*\* The Workplace Gender Equality Agency (WGEA) recently published employer gender pay gaps by mean, and median. The WGEA figures apply exclusively to workforces based in Australia. More information can be obtained from [wgea.gov.au](http://wgea.gov.au).

\*\*\*\* Total employees engaged includes all employees employed as permanent and fixed term full time and part time employees, and casual employees.

The information on this page is current as at 31 December 2025.

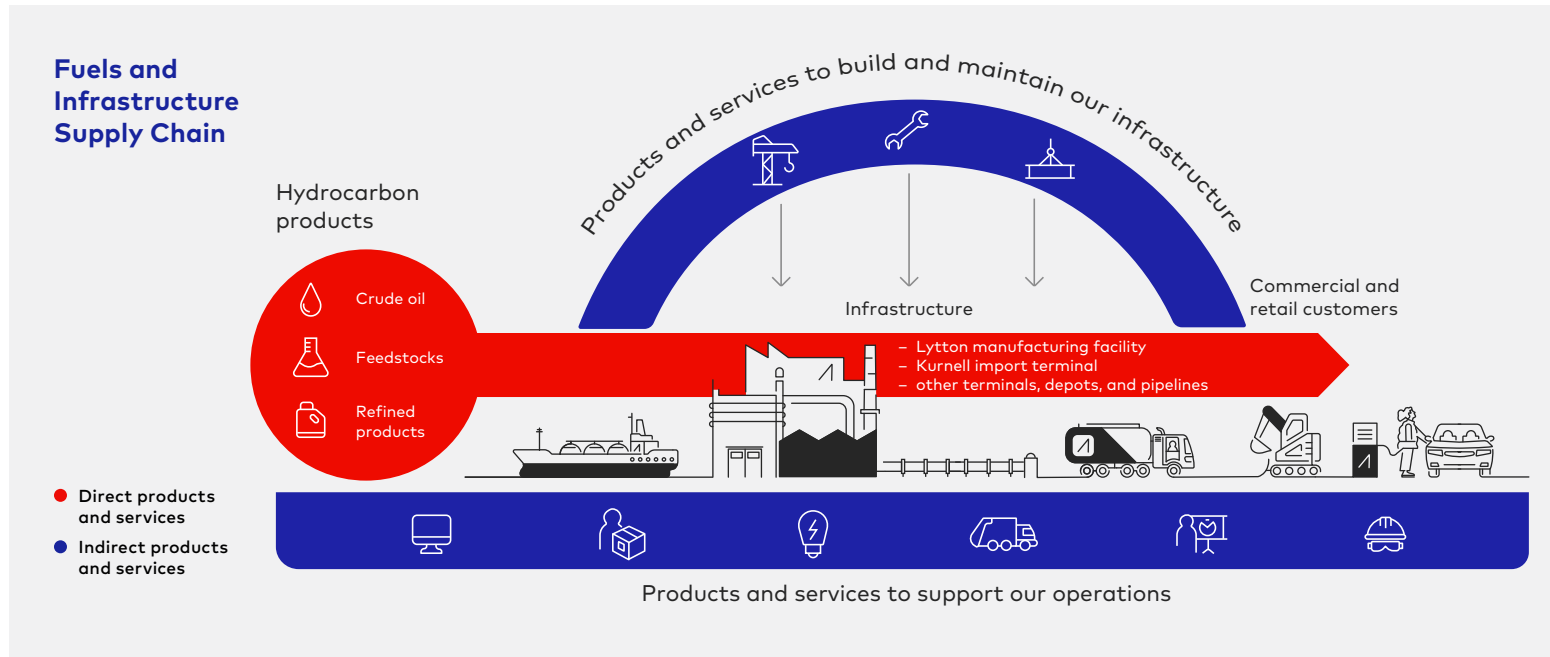
## Our supply chains



Ampol's supply chains include direct products and services for sale to customers, and indirect products and services to support our operations.

<sup>1</sup> Lower carbon liquid fuels and renewable fuels are industry terms used for liquid hydrocarbons made from non-petroleum based renewable feedstocks such as purpose grown biomass, or from waste material such as tallow or used cooking oil. It captures SAF and RD. Lower carbon liquid fuels and renewable fuels have the potential to lower fuel lifecycle emissions compared to traditional hydrocarbon fuels.

## Our supply chains continued



Ampol's Fuels and Infrastructure supply chain starts with the sourcing of hydrocarbon products both locally and from international markets. Ampol sources crude and refined products including gasoline, diesel, kerosene and lubricants from approximately 20 countries. Our crude and feedstock supply comes predominantly from North America, South-East Asia and North Africa, while our refined products are largely supplied by refineries in South Korea, India and Japan, as well as the blending, bunkering and oil trading hub of Singapore.

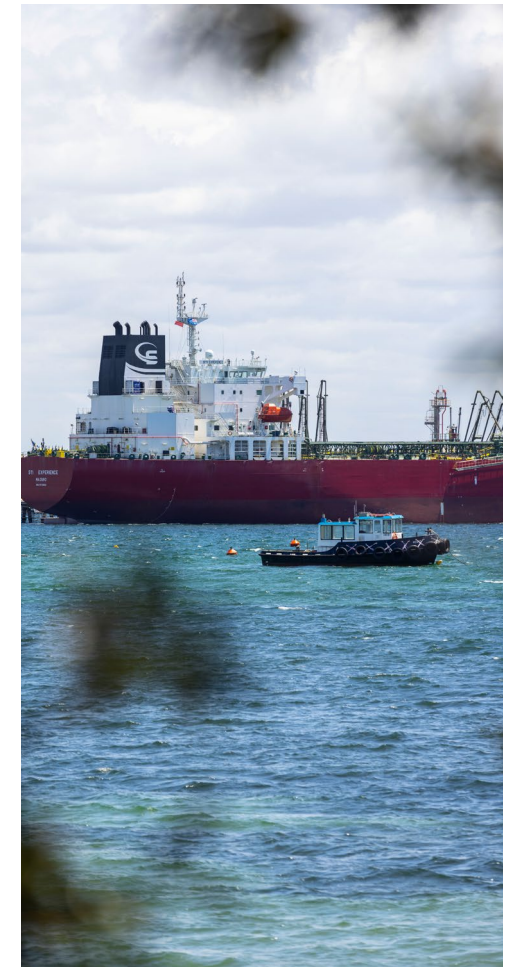
These products are then shipped or distributed:

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

In Australia, Ampol operates 11 terminals, seven major pipelines and 50 wet depots.

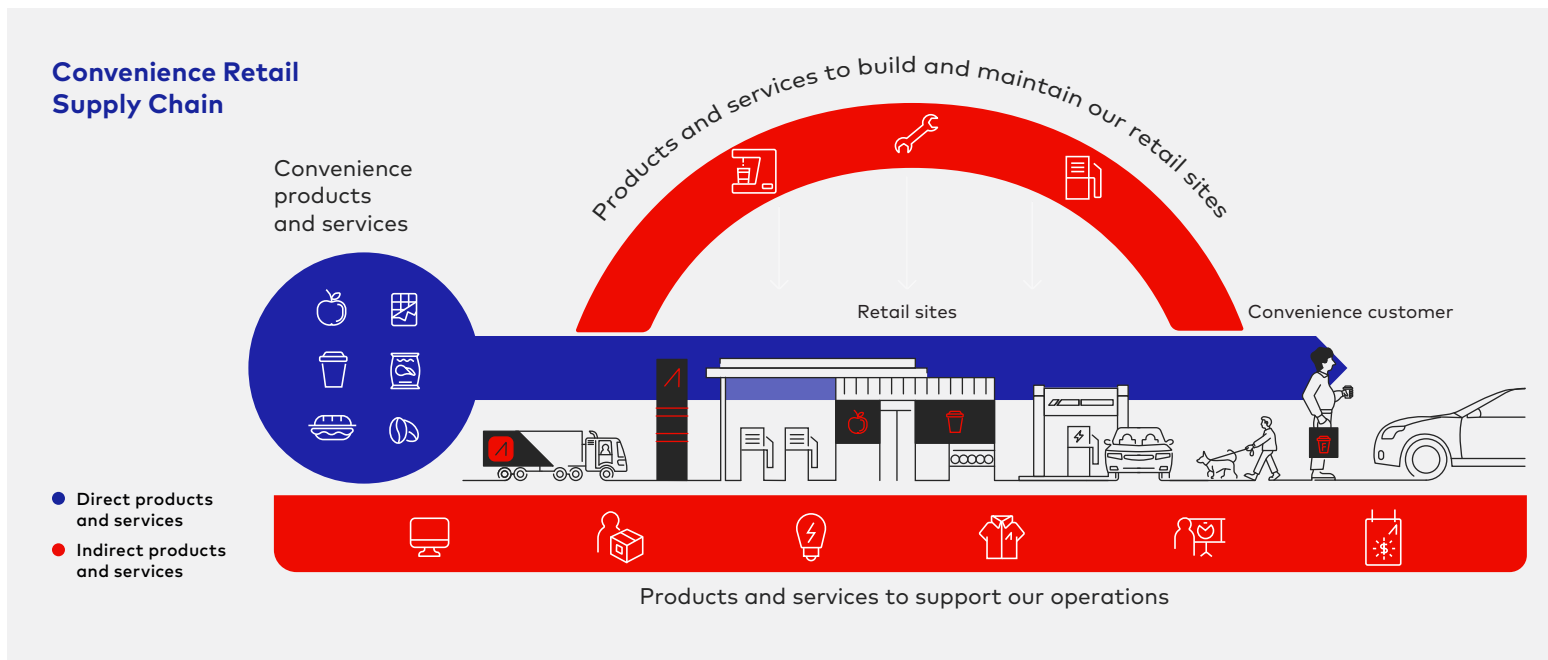
Ampol's Fuels and Infrastructure supply chains also include the procurement of products and services to build and maintain our infrastructure (for example, industrial painting, electrical and mechanical services), and support services and products (for example, logistics, IT infrastructure, plant, property and equipment, waste management services and professional services).

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



**11** terminals  
**7** major pipelines  
**50** wet depots

## Our supply chains continued



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

As at 31 December 2025, Convenience Retail had approximately 206 ongoing trade suppliers\* (excluding fuel and QSR products).

- All 206 ongoing trade suppliers completed an Ampol pre-questionnaire.
- All new fresh food and private label suppliers were required to complete the Retail Supplier questionnaire (a questionnaire designed specifically for food suppliers), as a requirement of the new supplier onboarding process. Ampol did not engage any suppliers that did not meet the requirements set by this questionnaire, which requires a minimum standard for a supplier's operations and processes.

- Based on Ampol's 2024 data that listed 142 ongoing trade suppliers, and with the benefit of the implementation of the Fair Supply system, Ampol determined the following risk categorisations for those 142 suppliers:
  - Six suppliers were characterised as moderate risk, primarily due to the nature of their industry. All six suppliers were in the fish bait category, and were characterised consistently with the risk profile of the fish bait industry, which is also rated moderate risk.

- The remaining 136 suppliers were rated as moderate low to low risk. All suppliers were rated consistently with their industry risk rating.
- No suppliers were categorised in the high-risk category.
- Of the six moderate risk suppliers, we sent a detailed modern slavery questionnaire to the major supplier who represented 82% of stock purchased in 2024. The Fair Supply system reassessed their modern slavery risk mitigation score to "developing" within the moderate risk rating. The remaining five suppliers do not maintain modern slavery statements due to their size.
- With the benefit of the implementation of the Fair Supply system, Ampol has since placed all 206 ongoing trade suppliers for 2025 through the system, and has characterised their modern slavery risk as follows:
  - Seven suppliers are characterised as moderate risk, in alignment with the risk ratings of their industries. These suppliers are all either from the fish bait industry or overseas manufacturing industry in Asia (both industries respectively also rated moderate risk).
  - 137 suppliers are rated as moderate low to low risk. These suppliers are all rated consistently with their industry risk rating.
  - 62 suppliers are categorised as low risk, in alignment with industry risk ratings for those suppliers.

\* Ongoing trade suppliers includes trade suppliers with which Ampol has ongoing contractual relationships, as distinguished from trade suppliers used on an ad-hoc basis. The increase in number of ongoing trade suppliers since 2024 (when there were 142 ongoing trade suppliers) is largely due to a major change of wholesaler in early 2025 that introduced a number of new manufacturers into the convenience retail supply chain.

## Our supply chains continued

- In addition to the 206 ongoing trade suppliers, Ampol sources fresh produce (including fruit and vegetables) from a variety of local suppliers and markets. The majority of these suppliers are categorised as high risk due to the variety of suppliers and the nature of the industries involved.
- Ampol conducted six site visits to ongoing trade suppliers in 2025.
- Ampol identified an overall reduction in medium risk suppliers compared to 2024, attributable in part to the implementation of a robust risk management system, Fair Supply.
- Ampol sources a large array of products through national wholesalers including Metcash (ambient) and PFD (frozen). Notwithstanding the wholesale agreements, Ampol continues to directly engage with wholesale manufacturers for due diligence purposes.

### Retail: Quick Service Restaurants & Hot Kitchens

Ampol's Retail QSR and Hot Kitchen operations comprise branded food and beverage offerings including Hungry Jack's, NoodleBox, Boost Juice and Soul Origin, which operate under franchise arrangements. These businesses primarily source food ingredients, packaging and branded products through suppliers approved by, or contracted with, the relevant franchisor. In accordance with franchise agreements, the majority of goods are sourced from franchisor-nominated or approved suppliers. In some categories, and where permitted under franchise arrangements, Ampol sources products directly from Australian-based suppliers, including fresh produce wholesalers and distributors, with raw materials predominantly supplied by Australian growers and processed domestically.

Ampol recognises that modern slavery risks can arise within complex, multi-tiered food and beverage supply chains. Within the Retail QSR business, Ampol has identified agricultural supply chains as presenting a heightened risk of modern slavery due to their reliance on labour-intensive activities. This risk is particularly relevant where wholesalers or suppliers subcontract labour to smaller operators, which can reduce visibility and oversight of labour practices.

Ampol's approach to assessing and addressing modern slavery risk within its Retail QSR operations is proportionate to its level of control and influence, recognising the franchise-led nature of these businesses. Ampol primarily relies on the modern slavery governance frameworks and due diligence processes of its franchisor alliances, including Hungry Jack's and Boost Juice, both of which publish Modern Slavery Statements outlining their supply chains and associated risks.

Franchise agreements include contractual obligations requiring franchisors and approved suppliers to comply with applicable modern slavery and anti-slavery laws.

Where Ampol directly selects wholesalers or suppliers, preference is given to established Australian businesses with existing compliance frameworks.



### Hot Kitchens

Ampol operates various restaurants and hot food takeaway offerings from its fuel retail sites (Hot Kitchens) and Ampol's own offerings, 'Journey Burgers' (introduced in 2024) and 'Foodary Kitchen' (introduced in 2025).

In the past three years, Ampol's food supply chain for Hot Kitchens has transitioned from a decentralised model relying on various individual local suppliers of bread, meat and fresh produce, towards a centralised supply model.

Streamlining the food supply chains has enabled consistency across menus, quality of supply management and aligned controls and procedures (for example, safety controls for managing food allergens). The new centralised model has also enabled Ampol to carry out modern slavery due diligence processes more easily across a consolidated supply chain that relies on large scale and mature suppliers, often with their own policies and processes to manage modern slavery risks.

#### → Future action

In 2026, Ampol will continue to look for opportunities to further centralise its convenience retail food supply chain enabling greater supply chain visibility for modern slavery mitigation purposes.

## Our supply chains continued

### Foodary Branded Products

A selection of Ampol's Foodary fuel retail sites offer a range of private label products branded as 'Ampol Foodary'. In 2025, Ampol introduced additional products to this line (including dim sims, caesar salads and fruit salads). The suppliers for these additional products were subjected to the Retail Program due diligence processes as set out at pages 18–19 and 31.

The current Ampol Foodary-branded product range includes:

- **heated snack foods** – either pre-packed or packed in-store, for example: chicken chips, chicken tenders, dim sims and habanero wings;
- **various packaged food and beverage options** – for example: bread, milk, water, cookies, limited edition pies, fruit salads, caesar salads and fresh sandwiches;
- **a selection of baked goods** – including pastries and a variety of cakes and slices, for example: custard tarts, vanilla slices, pecan brownies and caramel slices;
- **coffee products** – including self-serve coffee machines, iced cups for iced coffee and barista coffee.

Ampol's private label food products are made or produced by local suppliers. Foodary-branded consumables (for example, packaging and coffee cups) are sourced from manufacturers located in China. Ampol recognises the modern slavery risks present with these suppliers, primarily due to the nature of the manufacturing industry in Asia and our reduced visibility over labour practices and extended supply chains.\* These suppliers have been characterised through the Fair Supply system as moderate risk, consistent with their industry risk ratings.



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

\* Source: <https://www.walkfree.org/global-slavery-index/country-studies/china/>

## Our supply chains continued



### Energy Solutions

During 2025, Ampol continued to build upon its e-mobility strategy, which included the rollout of EV chargers across its retail network and into third-party sites. This forms part of Ampol's broader strategy to build a national charging network that will assist in minimising range anxiety for EV owners and support EV uptake.

As at 31 December 2025, Ampol had a total network of 494 EV charging bays across Australia and New Zealand.

- 290 AmpCharge charging bays in Australia across 88 sites.
- 204 charging bays in New Zealand across 60 sites.

The supply chain to build the necessary infrastructure for an EV charging bay includes:

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

The AmpCharge at-destination chargers are sourced from four global manufacturers based in Europe and New Zealand. The chargers are manufactured in Italy, the Netherlands, Hungary, Finland and New Zealand. The procurement process for these chargers includes selecting suppliers with product of higher reliability and who have more mature supply chains from a modern slavery perspective. Through the Fair Supply platform, Ampol has reviewed the modern slavery risk of these suppliers, which determined their risk ratings as low. Ampol considers this risk to be consistent with Ampol's modern slavery expectations.

The residential AmpCharge at-home chargers are sourced from manufacturers in China (two) and Australia (one). Ampol procures the chargers direct from the manufacturers.

Ahead of contracting new suppliers for provision of hardware (for example, charging equipment or site infrastructure) or labour (for example, specialist or third-party labour required for installation and site build), the Energy Solutions business ensures prospective suppliers are first screened through both the Moody's and Fair Supply platforms. The use of these platforms enables Ampol to review not only the potential modern slavery risks posed by these suppliers, but also carbon emissions, biodiversity, global trade and cyber security risk.

Ampol has determined that the risks associated with its current hardware and labour suppliers to be low.

**290**  
AmpCharge  
charging bays  
in Australia

**204**  
charging bays  
in New Zealand

## Our supply chains continued



### Z Energy

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

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

Z Energy supplies just over half of New Zealand's total liquid transport energy requirements.

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



### Supply and distribution

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

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



### Customers

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

Z Energy has the largest truck stop network in the country, with 138 sites. In 2025, Z Energy also provided fuel to customers through its network of approximately 500 sites (including Z Energy, Caltex and U-GO branded sites).

**138**  
sites in truck  
stop network

**498**  
Z Energy, Caltex  
and U-GO  
branded sites



## Our supply chains continued



### Case study

#### Gender inequality

Ampol recognises that gender discrimination remains a significant human rights concern across global value chains.

Women frequently face intersecting vulnerabilities, including reduced access to education and healthcare, higher rates of poverty and over-representation in informal or precarious work. These factors heighten the risk of discrimination, violence and sexual harassment.

Workplace policies that don't adequately consider gender equality issues can risk further exacerbating health and safety risks for women. This may include stress and exclusion in male-dominated environments, limited support for pregnant workers, and a lack of transparency around wages and employment conditions. Such gaps can contribute to persistent gender pay inequities and continued underrepresentation.

Ampol's operations and supply chains span a diverse range of industries, including frontline retail, manufacturing, distribution, road transport, and aviation. Ampol recognises that inadequate gender practices can create reputational, operational, and legal risks, particularly within complex supply chains. Gender-related indicators can also serve as early signals of broader weaknesses in human rights governance and oversight.

Ampol has implemented the following four key programs aimed at addressing workplace gender issues.

#### **Gender Equality Study across our workforce to understand enablers and barriers to female progression**

In 2025, we conducted a detailed study across our workforce to understand the barriers and enablers of a positive experience for women across Ampol, and in turn, the practical actions that could strengthen our current ways of working. We analysed a range of data sources including internal employee engagement survey insights, data related to turnover, promotions, pay changes, anonymised survey responses and focus group responses from Australia and New Zealand. We also reviewed the Equileap Benchmarking Report, comparing Ampol with the Equileap benchmark and a range of selected peers.

At the study's conclusion, the findings were incorporated into a prioritised practical action plan. These actions included introducing a formal sponsorship model, strengthening support for employees taking parental leave through development of competitive policies, ensuring availability of end-to-end support for personnel, and building inclusive leader capability.

#### **Women Rising and Male Allies programs to strengthen gender equality education and advocacy**

Ampol participates in Women Rising, a global leadership development program that supports over 10,500 women globally. Initially launched within Z Energy as a flagship initiative supporting our commitment to diversity and inclusion, our participation in the program has spanned the Group since 2022. The program aligns with our Group Values and commitments, and is complemented by the Male Allies program.

Delivered through a blend of self-paced learning, reflection and group coaching, the Women Rising program is continually growing and runs multiple intakes each year. Participants self-nominate with leader support, based on their capacity to participate as well as their potential to influence beyond their current role. The program supports women in clarifying purpose, building confidence, navigating career pathways, strengthening wellbeing and recognising leadership capability. The Male Allies program complements Women Rising by providing education for men on workplace challenges for women and the practical actions that can build positive change.

Since 2022, we have had over 200 men and women participate in these programs, with twice yearly intakes. These efforts ensure we are continually building capability, influencing and impacting in the realms of progressing gender equality and reducing modern slavery risks for our female workforce.

#### **Targeted education on drivers of gender pay equity**

In the first quarter of 2025, Ampol launched a new Group Career Framework (GCF), setting up a structure by which jobs across the Group are categorised through a common language, (including job bands, competencies, job levels and job families). The introduction of the GCF enabled Ampol to perform a more accurate analysis of comparable roles and pay equity mid-points. To strengthen leadership capability, Ampol conducted a workshop to explain common drivers of gender pay gaps, during which decision-makers were taken through a new pay equity methodology and open discussion was held on the influence of their roles on the matter of gender pay equity.

This targeted education is another step Ampol has taken to address workplace gender issues, and by extension mitigate against related modern slavery risks.

#### **Implementation of gender representation and pay equity targets across the business**

To help guide our progress towards advancing gender equality, we have set representation targets of 40% of our whole workforce, 40% of senior leaders and 20% of the Ampol Leadership Team comprising of females. We have also introduced a like-for-like pay equity target of +/- 1%. Our progress from FY23 to FY25 has resulted in us achieving and maintaining these targets. For further detail on these targets and our progress, see our FY2025 Corporate Governance Statement.

## Our supply chains continued



### Case study

#### Supplier site visit enhancement



In 2025, Ampol implemented a new Australian supplier site visit process requiring Ampol assessors to complete a comprehensive checklist designed to identify potential modern slavery risks.

This enhancement has enabled a more rigorous and targeted approach to modern slavery due diligence across the Australian Ampol convenience retail supply chain, supporting the identification of risks as they arise. Although fewer site visits were undertaken in 2025 compared with the previous year, the introduction of this process has strengthened the overall quality of assessments and improved Ampol's insight into the maturity and effectiveness of supplier processes.

The new supplier site visit process sets out an end-to-end procedure to guide assessments that encourage a genuine evaluation of a supplier's site and operations, as well as working conditions, amenities and support available for their workforce. The updated process sets out actions for assessors across three broad phases of a site visit (before, during and after the visit).

#### Before the visit

Assessors are encouraged to consider whether it is appropriate to inform a supplier of the nature of the modern slavery review to be undertaken, particularly where notice may impact the quality of responses received. Where notice is given, the checklist is provided to the supplier and copies of their modern slavery procedures and policies are requested for our review.

#### During the visit

Assessors will go through the checklist and note down supplier responses. Supplier responses should be supplemented by relevant examples and real-life observations made by the assessor.

The questions on the supplier visit checklist address workforce age, recruitment, wage and payment process, citizenship and migration status, and the nature of employment agreements. There are also questions related to feedback and communication avenues available to workers, existence of human resources policies and procedures, and access for staff to facilities and amenities. These questions target key modern slavery risks related to slavery, forced labour, child labour and deceptive recruiting for labour or services, towards which Ampol has zero tolerance and actively works to ensure that these risks do not present themselves across our supply chains.

#### After the visit

The updated process requires assessors to address any concerns following a site visit, including potential escalation to an action plan. A records management process for completed checklists and findings is also prescribed.

#### → Future action

In 2026, Ampol Retail Australia will conduct a minimum of nine site visits using the updated site visit process.

## Modern slavery risks and practices

As our offerings continue to change and expand, we must regularly reassess the supply chains we engage with to identify and address potential modern slavery risks.

In 2025, we continued to roll out our QSR strategy across our Hungry Jack's, NoodleBox and Boost Juice branded sites, and launched our first Soul Origin branded site. At the same time, we progressed Ampol's Energy Solutions strategy, which involves the procurement of various types of EV chargers.

The supply chains associated with these activities present risk factors that differ from those in our traditional transport fuels businesses.

By reason of the complexity of Ampol's supply chains and the modern slavery risks that they present, Ampol maintains, for example, a detailed modern slavery risk assessment process in Australia that operates across our Australian business units, enabling identification of areas of concern.

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

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

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

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

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

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



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

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



### Procurement of high-risk services, for example:

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



### Interactions with high-risk industries, for example:

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



### Reliance on vulnerable workers, for example:

- foreign visa holders in both Ampol controlled and non company-controlled retail sites;
- young workers at Ampol's QSR sites;
- family and other small business suppliers with smaller local suppliers (for example, fish bait), where there is less rigour and formality in the employment relationships; and
- within the non company-controlled Z Energy sites (including Caltex branded retail sites).



### Use of high-risk business models, for example:

- the use of guard services procured through third-party labour hire arrangements at Ampol sites; and
- the use of base-skilled construction labourers, also procured through third-party labour hire arrangements in significant construction projects.



### Procurement from high-risk countries, for example:

- the purchase of uniforms manufactured in China and Vietnam, products classified as 'at risk of modern slavery' in the Global Slavery Index;
- the purchase of cocoa-based products from large multinationals where the product is farmed in West Africa, giving risk to child labour risk;
- sourcing EV chargers from multiple providers that manufacture in high-risk countries; and
- sourcing chemicals from international suppliers.

## Modern slavery risks and practices continued

### Governance

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

We believe adopting a high standard of corporate governance is essential to ensuring modern slavery risks are appropriately managed at Ampol. The following governance structure supports the management of modern slavery risks at Ampol.



 Further information on Ampol's Corporate Governance Framework, practices and policies is outlined in our CGS which is available on the [Ampol website](#)

### Our policies and expectations

#### Corporate Governance Statement

Ampol is committed to acting lawfully, ethically and responsibly, which plays a critical role in our success as an organisation and our ability to generate shareholder value. This commitment is described in our CGS, published annually alongside the Annual Reporting suite of reports. A requirement under the ASX Listing Rules, the CGS describes Ampol's Corporate Governance Framework and key practices and policies. This includes Board and Committee roles and composition, directors' skills and diversity, representation, equity and inclusion **(REI)** measurable objectives and disclosure on progress, risk management, sustainability, our Values and Code of Conduct and key aspects of communication with shareholders and continuous disclosure obligations. Ampol's latest CGS was developed for the 2025 reporting period and aligns with the fourth edition of the ASX Corporate Governance Council's *Corporate Governance Principles and Recommendations*.

#### Ampol Values and Code of Conduct

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

During 2025, Ampol reviewed its Code of Conduct which now extends to all entities across the Ampol Group, irrespective of location.

The Ampol Code of Conduct defines the standards of conduct and behaviour expected from all employees, directors and officers of the Ampol Group. Ampol also expects external parties with whom we engage, including suppliers and customers, to act in accordance with our Code. The Code sets the foundation which defines Ampol's expectation of its people and includes a firm commitment to supporting the fundamental principles of human rights as expressed in the International Bill of Human Rights, the International Labour Organisation Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights.

The Ampol Code of Conduct confirms Ampol does not tolerate any form of slavery or child labour, including forced labour, and acknowledges that to respect human rights, Ampol needs to manage any adverse human rights impacts that we may cause or to which we may contribute or be linked.


In the fourth quarter of 2025, Ampol introduced a unified set of Group Values to establish a consistent cultural foundation across the Group. The updated Values support the refreshed Group Strategy by providing a shared framework to guide decision-making, reinforce accountability, and ensure alignment in how priorities are executed across the business.

## Modern slavery risks and practices continued

The Group Values articulate the behavioural expectations that shape Ampol's culture. They clarify what the organisation stands for and provide a practical reference point for employees when making choices, resolving issues, and determining the most effective way to deliver outcomes. By setting clear expectations, the Values promote disciplined judgement, cohesive ways of working, and a common standard for evaluating conduct and performance.

The three Group Values: **Move as one**, **Make it happen**, and **Make it count**, were developed to be memorable, pragmatic, and broadly applicable across all parts of the Group. Each Value is supported by an aspirational theme and defined behaviours that describe how it should be applied in practice. This structure ensures the Values function not as abstract concepts but as practical tools that guide collaboration, execution, and continuous improvement.

These Values are now embedded within core organisational processes, including the Code of Conduct, onboarding, performance assessment, and the mechanisms through which positive behaviours are recognised. Through this integration, the Values operate as an anchor for consistent decision-making, cultural alignment, and the disciplined delivery of strategic priorities across Ampol's operations.

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

### Ampol Supplier Code of Conduct (Australia)

Our respect for human rights provides the basis for our expectations of ourselves and for our counterparties. These expectations are set out in the Australian Ampol SCoC, and include Ampol's expectations around labour and human rights. The Ampol SCoC sets out expectations that counterparties will:

- ensure all work is freely chosen without the use of modern slavery, including forced or compulsory labour;
- ensure workers are of legal age, preventing any form of child labour;
- pay their workers lawful wages; and
- provide fair working conditions for employees.

The principles outlined in Ampol's SCoC apply to all third-party suppliers, contractors, trading and business partners and service providers (suppliers) and their employees who transact with or provide any goods or services to Ampol.


 The Ampol SCoC can be accessed on the [Ampol website](#)

### Ampol Human Rights Policy

Ampol has enshrined its commitment to conducting its business in a manner that respects human rights in its Human Rights Policy. The Ampol Human Rights Policy calls out focus areas where respect for human rights is most critical to the way we operate, including:

- considering human rights and setting minimum expectations as part of sourcing and purchasing decisions; and
- providing a safe, secure and inclusive work environment free from discrimination, bullying and harassment, together with fair pay and labour conditions.

During 2025, the Ampol Human Rights Policy was reviewed in accordance with the established review cycle. The document was amended to include a new section and link on grievance mechanisms, enabling any reader the ability to directly engage with the Whistleblower Policy and relevant contacts to raise a grievance or report conduct of concern.

 The Ampol Human Rights Policy applies to the Ampol Group and can be accessed on the [Ampol website](#)

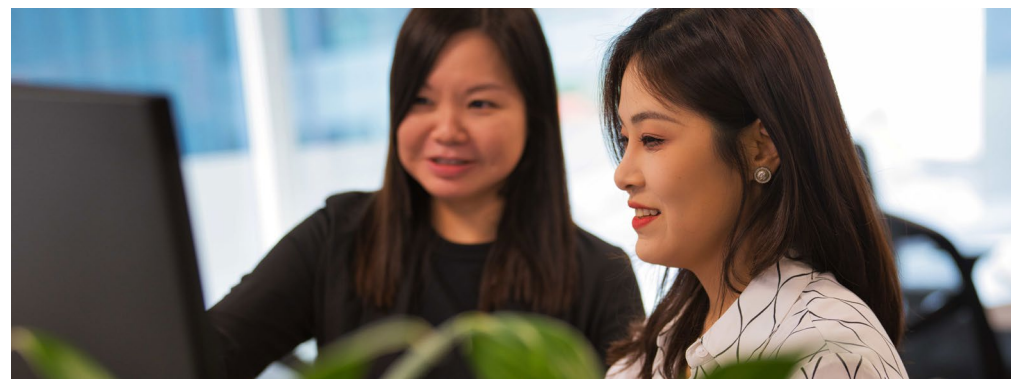
### Z Energy Supplier Code of Conduct (New Zealand)

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

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

#### → Future action

In 2026, Z will keep abreast of the progress of the proposed introduction of Modern Slavery legislation in New Zealand.



## Modern slavery risks and practices continued



### Case study

#### Ampol Group Modern Slavery Risk Assessment and Mitigation Standard



Updated in 2025, the Ampol Group Modern Slavery Risk Assessment and Mitigation Standard establishes organisational expectations and mandatory processes for identifying, assessing, and managing modern slavery risks across its procurement activities.

The Standard functions as a governance framework designed to embed human rights considerations into routine purchasing decisions, and to ensure compliance with both legislative obligations and Ampol's human rights commitments.

The Standard begins by positioning modern slavery as a broad category of human rights abuses, recognising that these practices can occur both abroad and domestically, including within supply chains that might ordinarily appear low risk. It outlines why the organisation must proactively identify indicators of exploitation, emphasising the complexity and opacity of global supply chains and the vulnerability of certain worker groups. By framing the issue in this way, the Standard sets the foundation for a risk-based and context-specific approach to due diligence.

This approach is operationalised through a structured assessment process. Ampol personnel involved in procurement are required to examine multiple aspects of each supplier relationship, including the nature of the relevant industry, the geographic context in which goods or services are produced, the characteristics of the labour force involved, the supplier's underlying business model, and the strategic significance of the spend to Ampol. This allows the organisation to build a nuanced picture of where the most salient risks may lie. To support this assessment, Ampol relies on a dedicated external platform (Fair Supply) that provides third-party risk analysis, functioning as an additional diagnostic tool to validate or elevate concerns.

Once a risk level is established, the Standard outlines how mitigation measures must be proportionately applied. These measures escalate depending on whether risk exposure is low, medium, or high. At lower levels, the focus is on ensuring that suppliers are bound by Ampol's fundamental ethical expectations, such as adherence to the SCoC and contract clauses related to modern slavery. As risk increases, the document progressively expects more intensive forms of scrutiny. For example, structured supplier qualification, assessment questionnaires tailored to modern slavery, and the use of targeted controls to address vulnerabilities. At the highest end of the risk spectrum, the Standard contemplates more intrusive interventions, including ethical audits, bespoke review activities, and requirements that suppliers demonstrate active training of their personnel on modern slavery risks.

The Standard establishes the necessary governance principles. Clear accountability is assigned across various internal roles, spanning the Chief Financial Officer, procurement leadership, governance specialists, and subject matter experts in legal and compliance. Each group has a distinct responsibility within the lifecycle of supplier due diligence, ensuring that the process is embedded and not merely procedural. The document also clarifies the role of the contract owner, who remains responsible for managing ongoing mitigation requirements and supplier performance over the life of an agreement.

To support implementation, the Standard integrates multiple appendices that provide detailed guidance, including risk categories, examples of industries and products known to present higher exposure, and an outline of the broader legislative and international frameworks relevant to modern slavery. These references help place Ampol's internal processes within the wider regulatory landscape and serve as practical tools for internal staff undertaking assessments.

The Standard functions as a comprehensive, mandatory system for controlling modern slavery risk throughout Ampol's procurement operations. It brings together governance expectations, operational guidance, due diligence workflows, escalation mechanisms and contractual tools, creating a structured model intended to promote ethical sourcing and responsible business conduct across the organisation's supply chains.

## Modern slavery risks and practices continued

### Supplier engagement in Australia

#### Ampol Supplier Code of Conduct compliance

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

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

This questionnaire remains a mandatory step in our supplier onboarding process. As at December 2025, 86% of Ampol's existing Australian supply base\* by spend had completed the questionnaire, exceeding our prior commitment of 80%.

The SCoC questionnaire process considers the following information obtained directly from the supplier:

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

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

Ampol has continued to improve the supplier due diligence framework since it commenced in 2019.

In addition to the SCoC questionnaire process, during 2024 Ampol commenced a process to assess all suppliers, with regard to industry and location, and with the benefit of the Fair Supply platform (exceeding the scope of assessment in prior years that only included the top 100 suppliers). The current scope now represents almost 100% of all spend (excluding retail). The assessment found that:

- 1% of suppliers are high risk;
- 24% suppliers are medium risk; and
- 75% suppliers are low risk.

Our expectations are communicated to our suppliers through the public availability of our SCoC, the SCoC supplier questionnaire, contractual agreements and when registering for tenders.

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

#### → Future action

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

### Contractual clauses and tender questions

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

The Ampol modern slavery terms include requirements for supply chain suppliers to:

- comply with modern slavery laws and not engage in modern slavery;
- maintain relevant policies and procedures;
- take reasonable steps to reduce the risk of modern slavery in their supply chains; and
- assist Ampol with its due diligence procedures aimed at reducing modern slavery risk in its supply chains.

#### → Future action

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



\* Excluding Convenience Retail shop procurement.

\*\* Within Ampol's Retail business, proposed suppliers are separately assessed by way of a pre-questionnaire, Retail supplier questionnaire and through Fair Supply. See pages 18–20 for detail on the Retail program.

## Modern slavery risks and practices continued

### Continued focus on due diligence

Ampol continues to operate in accordance with the Modern Slavery Risk Assessment and Mitigation Standard, which was introduced in 2021 and reviewed in 2025 (see page 28). The Standard provides a framework for assessing and addressing modern slavery risks when purchasing goods and services.

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

### Australian corporate program

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

The questionnaire enables Ampol to consider the following risks:

- the location of the supplier and the use of offshore labour;
- whether the supplier has its own supplier code of conduct or similar;
- freedom of association;
- wages and working hours;
- the extent to which the supplier has policies and action plans with respect to managing modern slavery risk;
- REI;
- bribery and corruption;
- sanctions;
- whistleblowing and grievance mechanisms;
- child labour; and
- health and safety.

### In 2025:

86% of new suppliers in Australia (excluding Convenience Retail) acknowledged and accepted our SCoC when commencing as a new supplier.

Ampol has made it a policy to ensure that renewals and recontracts with existing suppliers will include contractual provisions relating to the SCoC and modern slavery obligations, or an equivalent term as negotiated.

In addition to the supplier onboarding processes, 2025 was the first full year that Ampol had implemented a real-time monitoring service using a third-party provider. Through this service, Ampol maintains its risk assessment by way of third-party monitoring of adverse media events related to human rights and modern slavery. This ongoing monitoring enables Ampol to be alerted if any of its contracted suppliers are involved in any modern slavery event. During 2025, Ampol didn't receive any alerts as to adverse suppliers.

During 2025, key corporate policies including the External Spend Standard and the Ampol Group Modern Slavery Assessment and Risk Mitigation Standard, were reviewed and aligned under a single mandated framework setting out minimum requirements for supplier pre-qualification and modern slavery due diligence. Following this review, the Ampol Procurement team worked to embed this due diligence framework across all supplier onboarding processes (excluding Convenience Retail). The new framework requires all suppliers to be compliant with the SCoC, modern slavery assessment and due diligence process, and to have passed checks in relation to adverse media, sanctions, politically exposed persons, convictions, events that relate to bribery, corruption and other events of this nature.

### → Future action

In 2026, Ampol's Australian Procurement team will set qualitative targets around supplier pre-qualification compliance under the framework introduced in 2025.



## Modern slavery risks and practices continued

### Retail program

In Convenience Retail, Ampol deploys a number of assessment tools when engaging a new supplier or during the ongoing supply relationship. The assessment tools that are applied in each case depend on the nature of the industry and supplier. The introduction of the Fair Supply platform into the Retail program in 2025 has enabled alignment in modern slavery risk assessment across Corporate\*, Retail and Z Energy.

Notwithstanding the introduction of Fair Supply, Ampol maintains a differentiated approach between Corporate and Retail programs, which recognises the significant variance in the supply chains between Retail and non-Retail suppliers.\*\*

The following assessments are conducted as part of the Retail program:

#### Pre-questionnaire assessment

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

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

### Retail supplier questionnaire

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

### Fair Supply

Up until the introduction of the Fair Supply system in 2025, the Retail program relied on an online assessment that operated as an independent due diligence process conducted internally by Ampol, considering a range of available information about the proposed supplier. The online assessment approach relied on publicly available information only. The introduction of Fair Supply in 2025 has given the Ampol Retail team access to a dedicated solution for determining modern slavery risk.

A key enhancement for 2025 was that when a supplier received a risk rating below the industry benchmark, Ampol would provide the proposed supplier with a comprehensive modern slavery risk assessment via the Fair Supply platform. This assessment continues to deliver suppliers detailed insights into specific areas of potential risk and assists Ampol with identifying appropriate remediation measures, to ensure that these are addressed or an action plan is established prior to a supplier's onboarding with Ampol.

### Site visits

Ampol continues to conduct site assessments of supplier operations based in Australia. During 2025, a new Retail site assessment process was commenced, as detailed at page 24.

Six site visits were conducted on ongoing trade suppliers in 2025, including three suppliers within the moderate to low risk categories.

### Reasonable Steps

In addition to the Retail product supply chains, Ampol recognises the risks of modern slavery across its broader operations. As part of Ampol's Reasonable Steps Program, validation checks continued to occur at dealer and associated sites in Australia. See page 34 for further detail on the Program.



\* The Corporate Program refers to all business units within Australia, excluding Retail.

\*\* See the Corporate Program section on page 30 for non-Retail suppliers.

## Modern slavery risks and practices continued

### Z Energy program

Z Energy continues to align its approach to modern slavery with that of the rest of the Ampol Group. This was achieved throughout 2025, with Z Energy's adoption of various Ampol Group standards and processes.

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



Risks of modern slavery that are relevant for Z Energy include:

- Higher risk business models
  - Z Energy does not directly operate any staffed retail sites. Pursuant to this model, there are vulnerable worker risks within the operator businesses. These include a reliance on foreign visa holders and issues associated with compliance with local workplace laws.
  - In Bulk Fuels, Z Energy engages some workers through third party contractual arrangements (labour hire).
- High risk products and sourcing risk
  - The Z Energy branded retail network sells similar products to the Australian Convenience Retail business. This includes agricultural products, electronics and products from higher risk industries.
  - For its Z Energy sites, Z Energy performs shop procurement and has oversight with respect to its supply chains. For Caltex-branded sites, individual operators separately procure the supply for their shop products. This gives rise to modern slavery risks due to the opaque nature of these supply chains.

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

#### → Future action

In 2026, Z will seek and identify additional opportunities in New Zealand to participate in forums discussing the prevention of modern slavery.

### Risk area deep dives

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

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

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

#### → Future action

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

## Modern slavery risks and practices continued



### Case study

#### Supplier Deep Dive – Signage Supplier Site Visit



In 2024, Ampol entered into an agreement with a signage supplier to support production of signs for Ampol and its U-GO brand.

The signage supplier was assessed and qualified in accordance with Ampol's standard corporate supplier pre-qualification checks and modern slavery due diligence framework. Through the Fair Supply system, Ampol assessed the supplier as low risk, but acknowledged the modern slavery risks present given the inherently high risk nature of the building services industry. In particular, the risks present in the sourcing of raw materials across upstream and often opaque supply chains were recognised.

In this context, Ampol required the supplier to complete an additional modern slavery self-assessment questionnaire as part of their onboarding process.

Ampol's Procurement team conducted a site visit to the signage supplier's manufacturing facility in 2025, as depicted in this picture. The visit enabled direct observation of operational practices and an on-site, risk-based modern slavery assurance review was conducted using Ampol's recently developed modern slavery site visit checklist. The checklist covers various modern slavery risks including assessing the supplier's compliance with local and national laws, working conditions, health and safety practices, and broader labour standards.

Through the site visit and questionnaire responses, Ampol was able to conclude the supplier demonstrated a mature and effective approach to identifying, managing and mitigating modern slavery risks, including across their upstream supply chain. This engagement provided Ampol with increased visibility over their supply chains, and confidence in their modern slavery risk management practices. It reinforced the value of targeted due diligence and site-based engagement to manage suppliers operating in higher risk industries.



## Modern slavery risks and practices continued

### Specific risk mitigation for higher risk areas

#### Entry-level workers at Australian non company-controlled sites

While not directly part of our operations, Ampol recognises the potential risk of exploitation of base-skilled workers employed as shop assistants (including as console operators) throughout our associated retail sites which are not company-controlled. This workforce includes vulnerable workers (such as foreign students with limited working rights), and migrant workers who may have limited understanding of their rights and how to enforce them.

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

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

- contractual obligations to comply with workplace laws;
- workplace compliance audits;
- a phone advice line that associated sites can call and receive free and confidential advice on workplace compliance and related matters;
- access to a dedicated hotline for employees wishing to confidentially raise wage or visa non-compliance issues (including the ability to raise concerns anonymously); and
- workplace information sessions facilitated by a third-party industrial relations association.

Since the program commenced, approximately 506 sites have been audited. Appropriate remediation has been required by Ampol where issues were identified.

#### Franchise sites

In 2018 Ampol commenced the process of transitioning franchise sites to company operations, resulting in ongoing reduction in the risk of exploitation within this part of the network.

At the end of 2022, five franchise sites remained, and at the end of 2023, only four sites remained. During that time, Ampol continued to require audits of these sites in order to maintain appropriate standards of compliance. Ampol had no franchise sites in its Australian network during 2025.

#### Associated sites (other than franchise sites)

During 2025, Ampol engaged independent auditors to conduct:

- 28 audits in its dealer network (noting two audits remain ongoing); and
- four audits in its distributor network.

#### → Future action

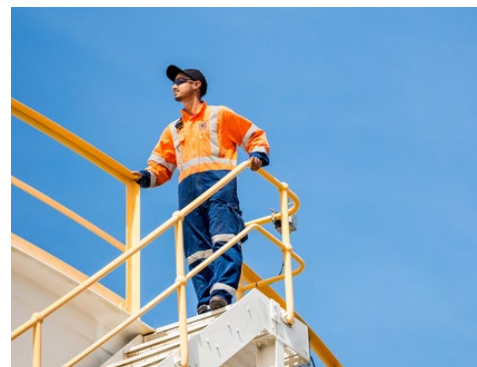
In 2026, Ampol will take steps to further communicate the dedicated Hotline for employees engaged within the Distributor network of sites.

Note: A 'Dealer' generally refers to a Retail site operator that has a branding and fuel supply deal with Ampol, but otherwise operates its business independently of Ampol.

A 'Distributor' generally refers to a larger business that also has a branding and fuel supply arrangement with Ampol that operates more broadly in a particular geographical area, including operating Retail sites, marketing bulk fuel and lubricant sales, and delivering fuel through road transport operations, but which otherwise operates its business independently of Ampol.



### Case study Dealer Code of Conduct



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

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

The Code is designed to ensure Ampol Dealers apply Ampol's expectations in terms of labour, human rights, ethical business practices and sustainability.

2025 was the first full year of the operation of the Dealer Code of Conduct.

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

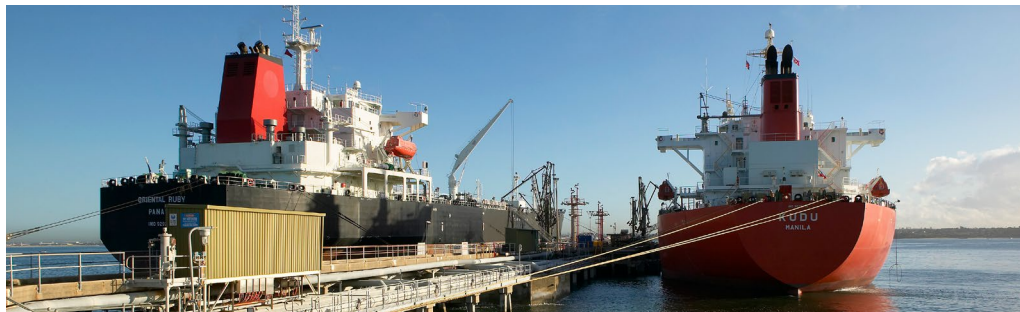
- expects Dealers to ensure all their employees freely choose to work, and that there are no forms of compulsory or forced labour;
- requires all workers are of at least the legal minimum age and that juniors are engaged in a manner consistent with workplace law and applicable award terms;
- expects Dealers to comply with all applicable industrial awards and agreements, including compliance with minimum wages, hours of work, rostering and leave;
- requires Dealers to provide a workplace free from discrimination on the basis of gender, age, race, ethnic or social origin, disability, family status, political views, religion, sexual orientation or carers' responsibilities; and
- expects Dealers to allow and respect employee representation and collective bargaining.

The Dealer Code of Conduct is communicated to all Dealers by way of the Dealer quarterly newsletter. The Code is made available otherwise by way of a central portal enabling all Dealers ongoing access. For new Dealers, the Code is issued with all relevant contractual documentation. Further, during any Dealer onboarding process, Ampol management ensure the Code is discussed as part of the onboarding checklist.

#### → Future action

During 2026, Ampol will commence development of a Code of Conduct applicable to its Distributor network, for rollout by 2027.

## Modern slavery risks and practices continued



### Seafarer welfare

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

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

Ampol remains vigilant to AMSA guidelines and continues to maintain due diligence steps to monitor the length of time each crew member has been on board a ship. For any crew member approaching 11 months of continuous service, Ampol will query their repatriation plan.

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

Ampol charters vessels on a singular voyage basis for the majority of its energy logistics supply chain. In 2025, Ampol engaged seven time-charter vessels, being vessels hired for an extended period. A time-charter arrangement allows Ampol to have greater operational control in the manning of the vessel through regular and periodic discussions with technical operators, enabling greater visibility and compliance with labour regulations and modern slavery requirements.

In 2025, Ampol's Marine Assurance Team performed 1263 assessments. One vessel was rejected for reasons relating to crew experience/ capability, and 160 vessels were rejected for various technical safety concerns. No vessels were rejected in 2025 for reasons linked to modern slavery practices.

Ampol's vessel rejection rate is relatively low by reason of the standards Ampol applies throughout its chartering process. Vessel operators with lower standards of compliance in all areas (including modern slavery) are generally not engaged with, through identification via due diligence at the early stages of the process.

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

#### World Check and PurpleTrac

Using World Check and PurpleTrac (third-party due diligence screening tools), all vessel owners are screened for instances of adverse media or litigation (including those relating to modern slavery) prior to onboarding, and on a continuous basis after being approved.

#### PSC inspections

Port State Control (**PSC**) reports (in compliance with the Maritime Labour Convention 2006) from the previous 12 months are reviewed for all vessels, to identify issues and for the avoidance of using vessels that have been detained by the PSC for unsatisfactory crew conditions.

#### Oil Companies International Marine Forum inspection reports

All vessels are checked for a current Oil Companies International Marine Forum (**OCIMF**) vessel inspection report, which focuses on safe operations and safety measures (including in relation to crew).

#### Industry engagement

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

#### Maritime Labour Convention certification

All vessels are checked for a current Maritime Labour Convention (**MLC**) certificate, covering issues set out in the Maritime Labour Convention 2006 including protection at work, living conditions, employment, health, social security and related issues.

#### Financial standing

A significant risk for ship crew is posed in the event a vessel owner goes bankrupt and abandons their ship and its crew. Ampol therefore conducts credit checks on all vessel owners to mitigate this risk.

#### International Transport Workers' Federation ship lookup

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

#### → Future action

In 2026, Ampol will continue its Marine Assurance program (see the Ampol 2023 Modern Slavery Statement for detail on the program).

## Modern slavery risks and practices continued

### Grievance mechanisms

Grievance mechanisms provide a direct channel of communication between individuals that have been adversely impacted and Ampol. They provide a way for Ampol to monitor whether our activities are causing, contributing to, or directly linked to worker exploitation, and to address related adverse impacts if they are identified.

Ampol is committed to ensuring that anyone that comes forward with concerns based on reasonable grounds is treated fairly.

### Ampol's Grievance Resolution Policy

Ampol's Grievance Resolution Policy provides a mechanism for employees to raise workplace grievances, including issues relating to their working conditions. Ampol ensures these issues are addressed in line with the Ampol Values and Code of Conduct.

### Whistleblower Policy

Ampol has a Whistleblower Policy that establishes a framework for Ampol to comply with obligations regarding whistleblowers, including legal protections provided by law for whistleblowers. The Whistleblower Policy is designed to protect our employees and those external to Ampol with close knowledge of our operations (including employees of suppliers) and encourages reporting of misconduct (including behaviour that is unethical, corrupt or illegal), without fear of retaliation.

### Z Energy

Any staff or contractor of Z Energy Limited who becomes aware of a legal, regulatory, policy or compliance issue, or a breach of the relevant Ampol or Supplier Code of Conduct also has access to a dedicated whistleblower service.



2025 was the first full year of the Z Energy Deloitte Whistleblower service's operation and availability for all employees of Z retailers. While these employees are not employees of the Z Energy business (by reason of the franchising arrangement), the extension of the whistleblower service has enabled broader access to a grievance mechanism by which concerns may be raised relating to human rights, discrimination and any other modern slavery matters through the Z Energy supply chain. When the Z Energy Deloitte Whistleblower service was introduced in November of 2024, safety meetings were conducted for retail employees to provide information on how to make disclosures, including relevant telephone numbers and the website address.

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

### Ampol Hotline

Ampol's own grievance mechanisms are supported by an independently-run, confidential Deloitte Whistleblower Hotline, which is open to Ampol employees, and individuals outside Ampol who have knowledge of misconduct relating to Ampol. The Hotline allows reports to be made anonymously and for matters to be managed and documented securely. Reports made to the Hotline trigger a process within Ampol to assess the report and take further steps, including investigation and remediation if appropriate.

Ampol has appointed officers who manage and oversee the handling of reports made through its confidential Hotline, as well as appointing officers responsible for ensuring those using the Hotline receive adequate protections. The Board of Ampol Limited, through the People & Culture Committee, has oversight of, and is informed of, any material incidents reported to the Hotline.

### Continuous improvement

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

- the regularity and ongoing nature of our modern slavery working group;
- the ARMF and Enhanced Compliance Program;
- ongoing reviews and reporting of employee and stakeholder grievance data;
- external engagement;
- training data and feedback from participants; and
- this Modern Slavery Statement and its necessary development, consultation and approval processes.

### → Future action

By the end of 2026, Ampol will have rolled out further facilitated training sessions on the whistleblower grievance mechanism to senior employees, which includes ongoing whistleblower training for the Ampol Board.

## Modern slavery risks and practices continued

### Training

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

All employees and contractors are required to acknowledge and agree to the Ampol Code of Conduct when onboarding.

Breaches of the Ampol Code of Conduct can be reported through Ampol's People and Culture team, a person's manager or the Ampol Hotline, and are monitored and reported to the People & Culture Committee every six months.

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

During 2025, Ampol continued the use of its modern slavery online learning module across its Australian and international entities. The modern slavery course forms part of a mandatory group of compliance training modules. The module is targeted at personnel who make supplier purchasing decisions, labour-related decisions or are key members of management with roles related to Ampol's commitment to eliminating modern slavery.

The course includes the following content:

- Ampol's approach to modern slavery;
- definitions and descriptions of modern slavery;
- modern slavery facts, using data and case studies;
- modern slavery high risk areas, and goods and services;
- why Ampol needs to understand its modern slavery risks; and
- how Ampol is mitigating modern slavery in its supply chain.

In 2025, 164 employees (within the joint reporting entities) were identified and required to complete the modern slavery awareness training across its two year compliance cycle. The completion rate of training as at 31 December 2025 was 100%, up from 99.4% in the prior year (of employees who were identified as requiring and completed the training).

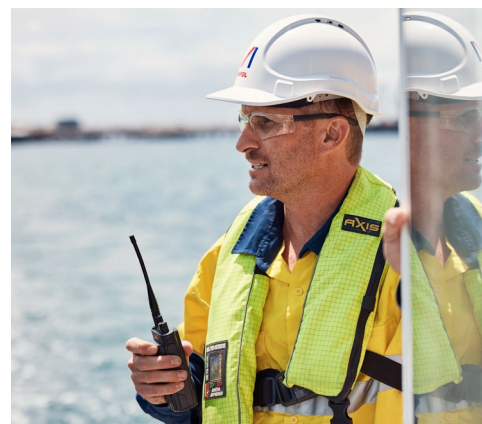
#### → Future action

Ampol will continue to require the modern slavery module to be mandatory for all identified leaders and decision-makers in a position to make a difference in accordance with Ampol's modern slavery objectives.



### Case study

#### Reasonable Steps Training at Associated Sites



During 2025, Ampol continued its program of training sessions for all its associated sites (including the dealer and distributor networks).

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

The training program in 2025 comprised of three, one-hour interactive sessions (for online participants) focused on the National Employment Standards.

The sessions covered the following content in 2025:

#### Session 1 – Casual conversion

Session 1 covered the new definition of casual employee under the *Fair Work Act 2010* (Cth) and the casual terms and conditions that apply specifically to casual employees under the Vehicle Repair, Services & Retail Award 2020. Additionally, the session covered the new casual conversion pathway under the National Employment Standards, including the new request and response obligations.

#### Session 2 – Termination and redundancy

Session 2 covered an employer's obligations with respect to termination of employment, including notice of termination, procedural fairness, permitted/prohibited wage deductions at termination and redundancy obligations (such as consultation obligations under awards).

#### Session 3 – Leave entitlements

Session 3 covered the various leave entitlements of employment within the *Fair Work Act 2010* (Cth) and the Vehicle Repair, Services & Retail Award 2020. This included annual leave, personal leave, family and domestic violence leave and long service leave. The session further discussed information on correct payment of leave entitlements, how different forms of leave accrue and the complexities regarding public holidays.

## Assessing effectiveness and consultation

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

The Ampol Group assesses the effectiveness of the actions we take in a number of ways:

- **Governance:** Feedback and assessment from the Board, Safety and Sustainability Committee and ALT on the implementation and progress of Ampol's modern slavery response program. This includes engagement with subsidiary boards.
- **ARMF:** The status and effectiveness of control measures relating to modern slavery risks are assessed via Ampol's ARMF risk assessment process.
- **Policies:** Periodic scheduled reviews of relevant policies, including the Ampol Group Modern Slavery Risk Assessment and Mitigation Standard that was reviewed in 2025.
- **Supplier Code of Conduct compliance:** Monitoring the number of suppliers who acknowledge Ampol's SCoC, the number of suppliers who complete the SCoC supplier questionnaire and the number of verification assessments completed.
- **Ongoing mitigation:** Continuous monitoring through third-party platforms to be alerted of the existence of modern slavery risks and events.
- **Audit:** The internal audit function provides the Board and management with an independent and objective assessment of the adequacy, effectiveness, and efficiency of Ampol's risk management, control and governance processes.

#### – Modern slavery working group:

The working group forms the core team that is responsible for delivering on the initiatives contained within each annual Statement, including drafting of the Statement itself. It is through the continuous process of objective setting, delivery, and reporting that assessment of effectiveness occurs.

#### – Contract clauses and tender questions:

Monitoring the number of precedents updated to include relevant modern slavery clauses, and the number of tenders including modern slavery questions and responses.

#### – Training:

Monitoring the number of individuals trained and feedback received on training content.

#### – Grievance mechanisms:

Monitoring and reporting (to the People & Culture Committee) on Ampol's grievance mechanisms, including discussion of trends and issues raised.

#### – External engagement:

External engagement with forums, peers and experts in the field to understand best practice and emerging information relating to modern slavery.

As we mature our modern slavery response program, we will look to improve our measurements of effectiveness.

### External engagement

During 2025, Ampol engaged with various third parties, including industry associations and local government authorities, to exchange information on approaches to modern slavery reporting. Through these forums, we gained insights useful to forming lessons learnt and highlighting opportunities for improvement across our own processes.

Ampol also participates in the Australian Industry Group's Modern Slavery Member Reference Group (**MRG**), which provides a link between industry and government to consult on matters pertaining to modern slavery. During 2025, the MRG heard from guest speakers including the NSW Modern Slavery Commissioner. Ampol also sent delegates to the annual Australian Industry Group Policy-Influence-Reform (**PIR**) conference, where the Commonwealth Modern Slavery Commissioner presented for the first time. During the session, the Commissioner provided feedback on modern slavery reporting, engagement with business and provided an opportunity for Q&A with conference delegates.

During 2026, Ampol will continue its external engagement by leveraging its industry associations to participate in modern slavery working groups and other related forums.

#### → Future action

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

Image: The Ampol Procurement team were joined by Kimberly Randle, CEO and Co-Founder of Fair Supply, for a discussion on environmental, social and governance (**ESG**) and modern slavery issues. Kimberly and her team explored how to establish meaningful ESG conversations with suppliers, ways to support supplier education on modern slavery awareness and risk mitigation (particularly for smaller suppliers not directly covered by legislation) and the increasingly active role procurement teams are playing in ESG due diligence and responsible decision-making.



## Assessing effectiveness and consultation continued



### Consultation with owned or controlled entities, including reporting entities

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

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

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

- key members of the ALT responsible for the overall management of all the reporting entities; and
- directors or senior leaders representing each of the joint reporting entities.

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

#### Entities owned or controlled:

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

#### Entities forming part of this joint Statement:

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

This Statement covers actions being taken by entities owned or controlled by Ampol. Investments in associates and joint ventures not controlled by Ampol are approached in a similar manner as with suppliers.

## Other relevant information and approval process

### Collective effort enhances the capacity to achieve meaningful reform.

We recognise that modern slavery persists today, and that confronting an issue of this complexity requires coordinated action with suppliers, customers, governments and our wider communities.

Tangible improvements and sustainable solutions arise from collaboration between the public sector, private enterprise and civil society. By addressing underlying drivers such as limited educational pathways and barriers to fair employment, we can help reduce the risks that foster modern slavery.

### Commitments and collaboration

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

Our total community investment contribution via the Ampol Foundation for 2025 was around \$5.149 million in programs and partnerships focused on supporting the Foundation's two key social areas of need. An example of a program supporting local community wellbeing and safety during 2025 was the new 'Heart Start Kurnell' initiative, which saw the Ampol team at Kurnell Terminal install two public access defibrillators in the local area. Ampol also fully funded cardiopulmonary resuscitation (CPR) training courses for community members, run in partnership with St John Ambulance NSW. The initiative, initially launched in response to an Ampol employee's involvement navigating a medical emergency, was aimed to equip the local community with both the tools and knowledge needed to respond to future medical emergencies.

In 2025, total community investment in New Zealand was around NZD \$2.531 million. Around NZD \$1 million of this amount was dedicated towards Z Energy's flagship community initiative, 'Good in the Hood'. Good in the Hood remains a key part of how Z Energy supports what matters most in the New Zealand communities in which we operate, with funding in 2025 being allocated to over 450 community groups to support positive local change, including addressing underrepresentation of support to Māori. The initiative importantly provided local community groups with the opportunity to raise awareness of issues with Z customers, strengthening local networks.

Reducing inequality and ensuring fair employment opportunities and quality education for all Australians will contribute to creating the underlying social infrastructure needed to eradicate modern slavery.



Further information on the work of the Ampol Foundation is set out in Ampol's [2025 Annual Report](#)



### Approval process

This Statement was reviewed and approved by the Board of Directors of Ampol Limited on 14 May 2026.

**Matthew Halliday**

Managing Director and CEO

Image: Heart Start Kurnell program, where two defibrillators have been installed at the front of Kurnell Post Office and the whale watching platform at Cape Solander in the Kamay Botany Bay National Park.

