

## **MODERN SLAVERY STATEMENT**

### **For the Financial Year Ending 31 December 2024**

#### **I. Introduction**

This statement is made pursuant to section 16 of the Modern Slavery Act 2018 and constitutes the anti-slavery and anti-human trafficking statement for the financial year ending 31 December 2024 for Puma Energy (Australia) Bitumen Pty Ltd (ACN 147 981 020) and Puma Energy (Australia) Assets Holdings Pty Ltd (ACN 167 119 020), (together, the **Reporting Entities**).

#### **II. The structure and operations of the reporting entities**

Puma Energy is an integrated global energy company. We have a truly global reach with operations in 34 countries across the world, including approximately 2000 service stations, and 26 Bitumen terminals in our business with a combined storage capacity of around 0.2 million m3 and a global workforce of around 4055 personnel including contractors.

Puma Energy (Australia) Bitumen Pty Ltd (**PEAB**) is a wholly-owned subsidiary of Puma Energy (Australia) Assets Holdings Pty Ltd (**PEAAH**). The ultimate parent of PEAAH is Puma Energy Holdings Pte Ltd, a company incorporated in Singapore.

The Reporting entities are companies limited by shares, incorporated and domiciled in Australia. The principal place of business is Level 19, 300 Adelaide Street, Brisbane City, QLD 4000. The registered office address is Level 8, 210 George Street, Sydney, NSW, 2000, Australia.

PEAB specialises in the importation, modification and supply of bituminous binders for the Australian road maintenance and construction industry. The range of products includes Paving Grade Bitumen, Modified Binders, Cutback Bitumens and Precoat. It has operations in Townsville, Perth, Brisbane, Melbourne, Sydney and Hobart. PEAB has no subsidiaries.

PEAAH has a non-operating working interest in Bitumen Storage Services Pty Ltd (**BSS**). BSS owns and operates a bitumen terminal in Perth.

The reporting entities together employ 80 employees including contractors.

We consulted the relevant companies we own or control in the development of this statement.

#### **III. Supply chain and risk of modern slavery**

PEAB procures bitumen from Trafigura Group Pte Ltd. (TAT), the group company based in Singapore who is responsible for sourcing and importation of product into the storage terminals located at Brisbane, Townsville, Sydney and Hobart. BSS provides storage and related operational services to third parties importing bitumen into Kwinana, Western Australia. All other raw materials (not bitumen) are sourced through a combination of local (Australian) and international suppliers. PEAB uses the imported bitumen at all locations to process and/ or modify it with additives and polymers before selling the final product to customers in Australia. PEAB blends some of its bitumen with an Australian company at its terminals and sells the final product to customers in Australia.

Raw materials other than bitumen; examples being polymer modifiers, crumb rubber and aromatic oils are sourced from within Australia, with an exception of polymers that are imported from Hong Kong - approximately 3% of total annual spend on non-bitumen raw material. Our non-bitumen procurement is

through suppliers, of whom 97% are based in Australia. The raw materials are stored in warehouses that are operated by Australian third-party logistics companies.

The imported bitumen is stored in the terminals owned and operated by PEAB in Townsville, Brisbane and Hobart. In Sydney, the bitumen is stored in the terminal leased from an Australian company, who own and operate the terminal. In Melbourne, the company owned facility receives Bitumen from the local customers for toll blend modification. In Perth, the imported bitumen is stored in a joint venture storage terminal 50% owned by Puma Energy Asset Holdings. In Perth, imported bitumen from BSS is used to manufacture bitumen products at the company owned terminal.

The Bitumen Technical Centre in Melbourne, Australia focuses on product research and development, from the assessment and selection of bitumen sources through to the performance of asphalt and sprayed seals.

Although the risk in our supply chain is assessed as being low risk for modern slavery, we are committed to working with our supply chain to ensure that together we can work to eliminate any form of forced, bonded or child labor.

We want to work with suppliers who share our values and support us in delivering our purpose of energising communities. Each of our suppliers has its own supply chain and we recognise that each level in the supply chain is responsible for ensuring compliance with all applicable laws and regulations, and for respecting human rights.

Puma Energy expects all suppliers and contractors to obey the national laws and international standards that require them to treat workers fairly, to provide a safe and healthy work environment and to protect environmental quality. Any allegations of wrong-doing raised are investigated and may result in suppliers being required to develop corrective action plans, backed up by onsite audits. In addition, contracts may be terminated with immediate effect if suppliers' breach, or are in suspected breach, of the Puma Energy Supplier Code of Conduct.

Our focus, for the purpose of this declaration, is on our direct suppliers; however, we expect suppliers to share our expectations, as embodied in the Puma Energy Supplier Code of Conduct, throughout their own supply chains.

#### **IV. Actions to assess and address the risks**

##### **Our commitment**

Puma Energy is committed to playing our role in mitigating modern human slavery, by ensuring that through our management and operations, that we have the systems, policies and processes in place to identify any potential instances of exploitation. If found, we eradicate modern slavery in all its forms from our business and supply chain. We are taking the appropriate steps to ensure that everyone who works for Puma Energy benefits from a working environment in which their fundamental human rights and dignity are respected, and that anyone we do business with also upholds these principles.

##### **Our purpose and guiding principles**

At Puma Energy, our purpose is to work with local people to energise communities and transform lives. We take pride in our role: listening, learning and sharing to raise standards, earn trust and help economies run better, solving problems and offering solutions that our customers need.

Our guiding principles reinforce our purpose and how we behave:

### Safety

- We make sure everyone goes home safely
- We all play our part to keep ourselves and everyone else safe

### Compliance

- We act with honesty
- We take compliance seriously and conduct our business in the most ethical manner, demonstrating full integrity and accountability at all times

### Customer Centric

- We put our customer at the center of everything we do
- We're dedicated to our customers and prioritise them in every interaction

Our principles are demonstrated by our conduct every day, and respect for human rights is embedded in our Code of Business Conduct. Our Code states: 'We Respect Others - Puma Energy and its employees respect the dignity, liberty and equality of everyone we work with – customers, vendors, suppliers and third parties alike. Our policies and procedures are based directly on the United Nations' Universal Declaration of Human Rights'. In pursuance of this, Puma Energy in Australia is committed to preventing slavery and human trafficking in its own activities and in its supply chain, by requiring suppliers to maintain ethical business practices, to prevent slavery and human trafficking in their businesses.

## Governance and policies

### Governance

The Group's Ethics and Compliance Committee (ECC) is responsible for the general oversight of the implementation of the Code of Business Conduct. The ECC provides guidance to the business regarding compliance with the Code and investigates and addresses any complaints of breaches of the Code including with respect to human rights. The owner of the ECC is the Global Head of Compliance, who reports directly to the CEO and the Audit Committee.

### Policies and Procedures

The following policies support us in mitigating the risks of modern slavery in our business and supply chain and are important steps in gaining supplier compliance. These policies are available to all contractors and employees on the company intranet.

#### Code of Business Conduct

At a corporate level, Puma Energy's Code of Business Conduct applies to all employees and direct contractors of the group. The Code describes what we must do and how we must behave and requires our employees to treat all individuals with dignity and respect, eliminating unfair and/or unsafe labour practices.

#### Supplier Code of Conduct

Puma Energy Supplier Code of Conduct addresses our commitment to seek out business partners who share our values and specifically prohibits our suppliers from using forced, bonded, involuntary, prison, or indentured labor.

We take violations of our Codes very seriously. Violations of the Supplier Code may result in termination of the supplier relationship, and other violations of the Code of Business Conduct and Ethics may result in termination of employment.

#### Speak-Up Policy

The policy sets out our commitments to creating an environment, where all employees and third parties can speak up about suspected breaches and violations of our Code and accompanying policies. It details how any person working at or with Puma Energy, including those employed in

our supply chain, can raise concerns or 'whistle blow' and the channels available to do so confidentially, responsibly and effectively and without fear of repercussions or retaliation.

The policy is supported by our dedicated helpline, in place for all employees and contract staff in Puma Energy and for third parties with whom Puma Energy has a business relationship (such as customers, suppliers, service providers). It allows them to raise concerns and report instances of potential non-compliance with our Code of Business Conduct, including respect for human rights, in full confidence and without fear of retaliation.

### **Diversity and Inclusion Policy**

This policy ensures that we foster a fair and inclusive workplace, where our people are valued, their differences are respected, and discrimination is eliminated.

### **Due Diligence**

Puma Energy's Supplier Due Diligence process requires that our suppliers comply with Puma Energy's Supplier Code of Conduct, make sure that they adhere to the requirements, require their own suppliers to respect equivalent standards, and pay particular attention to Human Rights standards like employees' working conditions.

Suppliers' compliance with the Supplier Code of Conduct is managed through our rigorous supplier onboarding due diligence process for all new suppliers. The questionnaire covers among many other aspects, questions on employee liberty, freedom of association and minimum age requirement.

While we are not currently verifying or auditing that all our suppliers comply with local laws regarding slavery and human trafficking, we will continue to assess our supply chain for areas of improvement in eradicating slavery and human trafficking, and will continue to expect our suppliers to do the same.

### **Training and Communication**

The Code of Business Conduct and its refresher training ensures that employees are familiar with the requirements of the Code of Business Conduct and the company policies. We have continued to train our employees on the various elements of our program.

Every new employee of Puma Energy in Australia must complete an online training course, which includes a module on our Code of Conduct and Speak Up platform. In addition to this online training, induction trainings are provided monthly in a virtual form to cover all new employees, ensuring that the employees understand the Code of Conduct. This also provides new employees with the opportunity to clarify any aspect of our Code of Conduct and whistleblowing service that they may understand.

## **V. Assessing the effectiveness of actions**

### **Risk Assessment**

We have conducted a modern slavery risk assessment of the Puma Energy group of companies which includes Australia. Our findings indicate that we do not supply any goods, globally or in Australia, that have been identified by the US Department of Labor <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods> or the Global Slavery Index <https://www.globalslaveryindex.org/2018/findings/country-studies/australia/>, to be at higher risk of being produced by child or forced labor, reducing our risk.

Our Code of Business Conduct and other accompanying policies, and actions taken by the Company, such as employment clauses and background checks, further mitigate this risk.

As an added measure, we have introduced a Human Rights Statement to reinforce our commitment in respecting human rights, as outlined in our Business Code of Conduct. In this, we incorporated questions related to the declaration of compliance with Modern Slavery rules and regulations into the vendor KYC process to assess potential exposure. To date, no red flags have been identified, contributing to a reduced risk within our supply chain.

### **Looking Forward**

At Puma Energy we remain committed to ensuring that we do business in the right way, respecting all that work with or for us. We will continue to embed these principles through:

- Providing risk-based training to employees whose functions are deemed at risk, such as Procurement, Human Resources and Retail stations, on ethical employment practices.
- Continue to monitor and take action to ensure zero tolerance in the supply chain.
- Re-KYC all Medium & High risk counterparties, to ensure that we have latest information on their companies.

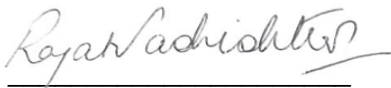
## **VI. Approval**

This statement has been approved by the Board of Directors of Puma Energy (Australia) Bitumen Pty Ltd., and Puma Energy (Australia) Assets Holdings Pty Ltd. The Board has authorised any Director execute the statement for and on behalf of the companies.

Date: 26 November 2025

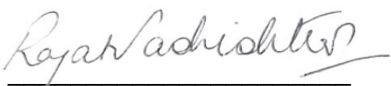
Signed on behalf of:

**Puma Energy (Australia) Bitumen Pty Ltd.**



Director: Rajat Vashishtha

**Puma Energy (Australia) Assets Holdings Pty Ltd.**



Director: Rajat Vashishtha