

Tax Policy

This document summarises the Tax Policy of Ampol Limited and its controlled entities (Ampol). The Ampol Tax Policy forms part of the broader Ampol Risk Management Framework.

The Ampol Tax Policy describes Ampol's principled approach to the management of its tax affairs and is aligned with the broader organisational goals and values of Ampol.

Ampol acknowledges that tax risk is inherent in its operations and aims to adopt a systematic approach to the identification and management of tax risk. The oversight and management of tax risk plays an important part in ensuring that Ampol complies with its legal obligations and its broader obligations to the community whilst continuing to protect shareholder value.

As part of Ampol's commitment to transparency in the management of its tax affairs, Ampol will publish an Annual Taxes Paid Report in accordance with Australia's Voluntary Tax Transparency Code.

The guiding principles to be applied by Ampol in the management of its tax affairs are as follows:

- Compliance with the relevant tax laws in all jurisdictions in which Ampol operates including in relation to taxation payments and the timing of those payments;
- Immediate reporting of detected errors/omissions to all relevant revenue authorities;
- Maintaining integrity of compliance, reporting and governance systems;
- Application of the arm's length principle to the pricing of transactions between Ampol group companies in accordance with the guidelines issued by the OECD to ensure tax is paid in the jurisdictions where value is created;
- Maintain open and constructive relationships with revenue authorities at all times;
- Provide evidence (as required) that tax positions adopted are legally sustainable in the event of challenge by a revenue authority; and
- Transactions entered into by Ampol have a clear business purpose or commercial rationale and do not rely on tax outcomes for their commercial viability.

The Ampol Tax Policy will be executed with the support of standards and procedures set by Management that form the Ampol Tax Risk Management Framework, the broader Ampol Risk Management Framework and the Ampol Delegations of Authority.

Management will report to the Audit Committee on tax risk matters four times per year, including in relation to how tax issues and risks are trending and to seek endorsement for material positions taken by Ampol that fall outside published revenue authority guidance.

Review of Policy

The Board will review this policy within six months of the second anniversary of its last review. The policy was last reviewed and approved by the Board on 13 June 2024.

Publication

This policy will be made available on the Ampol website (www.ampol.com.au).

Document change history

Version number	Conducted by	Approved by	Date	Description of changes
1	Group Tax	Board	10/05/2018	
2	Secretariat	Board	14/05/2020	Update references from Caltex to Ampol
3	Group Tax	Board	18/06/2020	Biennial Review – amendments to Guiding Principles and to comply with regulatory and governance requirements.
4	Group Tax	Board	20/06/2022	Biennial Review – minor amendments
5	Group Tax	Board	13/06/2024	Biennial Review – amendments to simplify wording and specify reporting to Audit Committee