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Introduction



"We seek out ways to show our support for inclusion in our workplaces and communities, and to invest in organisations and initiatives that strengthen human connections and promote equality."

- 2021SustainabilityReport

Top Oil has a strong history of more than 200 years in the oil and energy industry, and is committed to providing its customers and retailers in Ireland with quality petrol and diesel fuel products. Its network includes more than 200 locations, 22 local depots, six motorway areas and more than 200 Fuel Card locations. Top Oil was acquired by Irving Oil in 2019. Founded in 1924, Irving Oil is a family-owned company specialising in the refining and marketing of finished energy products, with operations throughout Eastern Canada, the US and Ireland. Irving Oil also operates Ireland's only refinery, located in the village of Whitegate.

This report reflects our obligations as an Irish employer based on the Gender Pay Gap Information Act 2021 which was signed into law in July 2021.

This report focuses on the gender pay gap across the 541 employees at Top Oil as of 30 June 2022. The report focuses only on gender pay gap reporting, distinct from equal pay.

2022 Gender Pay Gap



Our organisation is committed to putting clear goals and supporting actions in place to address our gender pay gap.

A gender pay gap is the difference in the average pay and bonuses of all males and females across an organisation. The gender pay gap calculations do not account for differences in pay due to the nature of the role, grade or years of service. All of these variables impact the results.

The gender pay gap is different from equal pay which means paying women and men the same salary for performing the same or equivalent work. Accordingly, this report focusses only on gender pay gap reporting, as distinct from equal pay.

In addition, when considering our pay gap, we are mindful of the diverse range of roles within our business; from our frontline retail teams in stores, highly trained professional ADR drivers in the field, technical terminal operations teams, professional sales team (inside and infield) working directly with our customers everyday and finally our corporate services teams supporting our business operations. This provides for a broad spectrum of diversity within our business which is reflected in our results.

This report has been prepared in conjunction with our Legal and Data analysis advisors. In it we address the underlying reasons for our gender pay gap and outline our actions and plans to eliminate the gap in future years.

We at Top Oil continue to strive to provide equal employment opportunities for everyone. We are committed to building a diverse team and celebrating all the innovation and bright ideas this brings. We want to ensure that our team members receive equal pay for equal work and will align our activities to support this endeavour and on improving the gender pay gap.

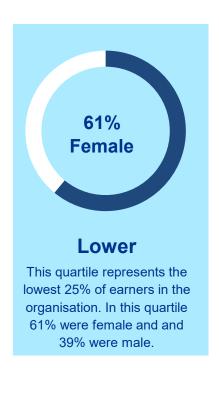


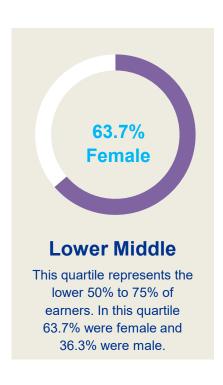
Should you have any queries on this report please contact Kristy.Brewer@irvingoil.com

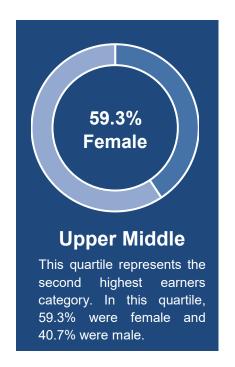
Gender Pay Gap Findings

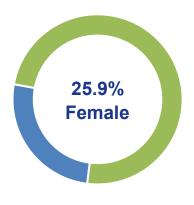


Percentage of males and females when divided into four quartiles ordered from lowest to highest pay









This quartile represents the

top 25% of earners in the business. In this quartile we found that 25.9% were female and 74.1% were male.

Upper

In the lower quartile, the majority is made up of our frontline retail roles. These roles are often worked part-time and offer flexibility around working hours. The market for these types of roles is typically more female dominated. In the upper quartile, we have 74.1% males. Our commitment to increasing female representation in leadership will place more females in the Upper Middle and Upper quartiles thus aiding in the reduction of our gender pay gap. We anticipate that over time the initiatives we are implementing will result in more of an even split of men and women in all quartiles.

Gender Pay Gap Findings



The statistics below should be read in light of the explanations on page 8 and 9 of this report. The gender pay gap calculations do not account for differences in pay due to the nature of the role, grade or years of service. All of these variables impact the findings below. These findings are on the basis of pay over the requisite 12 month period.



Total +25.4% (excl. frontline retail roles, pay gap is +8.0%)

Mean Gender Pay Gap

The mean gender pay gap covers the mean hourly pay of all relevant male and female employees on the chosen snapshot date of 30 June 2022. Top Oil has a mean hourly pay gap of +25.4% and a median hourly gap of +37.3%. If we exclude the frontline retail business from the calculations. Top Oil has a lower gender pay gap of +8.0%. This is a direct result of lower market compensation rates. Further analysis of our lower quartile, which primarily represents our frontline retail roles, has a positive pay gap of -0.5%.



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On 30 June 2022, Top Oil employed over 500 people with more than half (52.5%) of the workforce being women and the majority of those working in our retail space. These calculations were based on 284 women and 257 men employed by Top Oil on the snapshot date.



Part-Time Employees

Part-time employees have a negative gender pay gap – this means that on average female part-time employees have a higher hourly remuneration than males. Top Oil has a mean hourly pay gap of -7.9% and a median hourly pay gap of -0.6% for part-time employees.



Temporary Employees

In Top Oil, we have a small number of temporary employees and of those employees there was a negative gender pay gap with a mean hourly pay gap of -34.1% and a median hourly pay gap of -32.3%.

Gender Pay Gap Findings



+49.0% Bonus Gap

We have a mean bonus gap of +49.0% and a median bonus gap of +58.4%. This can be explained by the fact that not all roles attract a bonus. Our frontline retail roles do not contractually attract a bonus. These roles are currently female dominated. If we exclude retail sales roles, the bonus gap is reduced to +36.2%. In addition, our highly technical terminal operations teams and professionally licensed ADR drivers are all male dominated which further impacts these results.

56% of males and 32.4% of females were in receipt of a bonus

100% of eligible male and female employees receive a bonus.

100% of our employees received benefit in kind

100% of females and 100% of males received benefit in kind. Top Oil's renumeration package provides all employees with various non-cash benefits including the Employee Assistance Programme and annual Christmas gifts.



Explaining our gap



For 2022, our average gender pay gap was **+25.4%** (excluding frontline retail our pay is gap **+8.0%**). We are committed to improving and reducing this in the coming years.

In Top Oil, we have a diverse workforce and have close to a 50/50 split of male and female employees. Our employees work in a variety of roles across our business which attract sectoral/market based remuneration. Our remuneration structure reflects the variety of roles within our organisation (naturally, regardless of gender). We believe that there are a few key reasons for our gender pay gap.

Uneven gender representation

Uneven gender representation has a significant impact on our gender pay gap. Excluding our retail business, the industry that we operate in has been predominately male. For example, our field operations teams comprised mostly of our truck drivers and terminal teams are currently 100% male. The industry is slowly changing and we hope to be one of the employers that is a catalyst for encouraging this change.

Gender imbalance can also be seen in our convenience retail business, where remuneration is in the lower quartiles. These roles are often part time and offer flexibility around working hours. There are currently close to twice the number of females than males in these roles. If we exclude the frontline retail business from the calculations, Top Oil has a significantly lower gender pay gap of +8.0%.

Notwithstanding, nearly half of all females in the upper quartile (highest earners) have joined in the last 5 years supporting our commitment to increase the number of females in leadership roles by 2030.

Long Service

A second area we identified was the correlation between time in the company and mean pay. Encouragingly we have a 5.5% gender pay gap for employees within their first year in the company. This is in contrast to employees with 10+ years service where there is 15.3% gender pay gap. This is largely due to there being more men than women in senior positions with longer tenure.

Explaining our gap



Women are under-represented in the industry

There is a general under-representation of women in trades and technology subjects within the education system and this is reflected in the gender representation in our organisation. An imbalance of females in senior management roles is not uncommon in this industry and is something we have recognised in our own organisation. Historically the market for some of our higher paid roles has been male dominated, but with increased awareness and investing in women, we expect to see the pool of female candidates for these senior roles continue to increase.

More men than women in senior positions

There are three times more men than women in the upper pay quartile of the organisation, nearly half of all females in the upper quartile (highest earners) have joined in the last 5 years. We continue to modernise our policies and support our female employees to manage and develop their careers. Having proportionately fewer women in senior levels, where pay is higher, impacts the gender pay gap. This imbalance in gender representation at the higher levels impacts the hourly mean and median pay gaps.

Why we have a bonus gap

Bonus gaps need to be understood in the context of the roles they apply to. A number of employees with different remuneration models did not receive a bonus due to their roles. This was naturally irrespective of gender. As is typical within the industry, retail roles do not have access to a bonus from a contractual perspective. As these retail roles are currently predominately held by females, this has an impact on our bonus gap.

Actions we are taking



Looking to the future

Some of the measures to improve the gender pay gap will take time to embed in the organisation and for the results of their impact to be apparent. We believe in making sustainable and long term changes to improve the gender pay gap and are committed to helping every employee, regardless of gender, to reach their full potential. As part of our commitment to closing the gender pay gap we are focused on four key areas, as highlighted below.

We are currently reviewing our policies and processes to strengthen them in this regard. We anticipate that some of our newer policies such as our flexible work policy will support our goal. Our parental leave policy goes beyond the statutory requirements and offers additional flexibility to our employees caring for children. This allows for more opportunities for women to progress their careers in Top Oil.

01

ESG Goals

02

Attraction & Recruitment

03

Performance Management & Coaching Programmes 04

Diversity & Inclusion Programmes

Actions we are taking



01 ESG Goals

In 2021 we had 31% females in leadership roles. In line with our ESG Goals for 2022, our target is for a minimum 40% female representation in all leadership roles by 2030. Our long-term aspiration is to increase the overall representation of historically under-represented groups in our diverse team. reflecting more perspectives in our decision making. We want to build a strong, inclusive culture that supports diversity, individuality and respect where employees are proud to work and feel that they belong.

02 Attraction & Recruitment

We continue to be committed to sourcing top talent and striving to be inclusive and remove barriers in our recruitment processes. We employ processes to select, identify and develop employees and to expand the capabilities of our workforce regardless of gender or background.

Our Human Resources Team and managers receive appropriate training, including unconscious bias training, to support the hiring process being objective as possible. We strive to remove biased language in job adverts and interviews focus on the requirements of the job role. Working with an external consultant, we have implemented a compensation framework which benchmarks the salary range for a role in advance of any hiring taking place. This was developed so that the salary range is reflective of the role and the duties involved regardless of gender. This compensation model was introduced in August 2022 and we hope to see the benefits of this programme on the gender pay gap in the coming years.

Actions we are taking



03 Performance Management & Leadership Programmes

We actively support the skills development and career progress of our employees through the performance management company programme. Each employee is required to have a developmental goal focussed on supporting their development career aspirations. We offer a coaching programme for leaders as part of our Core Leadership Foundations programme targeted at confidence building, skills development and network opportunities within the business. Our Core Leadership Development Programme will expand in 2023, further developing our leaders to grow their capabilities which will ultimately lead to career progression opportunities. We are working towards having more training and available development opportunities females so that they are ready for opportunities as they arise for more senior roles.

04 Diversity & Inclusion Programmes

Our Company has established a Diversity & Inclusion programme, spearheaded by our Diversity & Inclusion (D&I) Council. Our D&I Council is composed of 12+ volunteers from across our company, who are helping advance our D&I efforts. The Council acts as an advisory panel to our company on all matters D&I. The Council includes members from our Top Oil Team, Human Resources Team, Corporate Social Responsibility (CSR) Team and various other areas of the company.

In addition to our Council we have our 'All-In ERG' (Employee Resource Group) who design and execute company wide activities. All-In is a forum for employees to learn, network, participate and contribute to diversity and inclusion in our organisation, fostering a strong, inclusive workplace culture and celebrating the diverse voices of our employees. Delivering meaningful programming and learning opportunities in the areas of diversity and inclusion is the aim of the group, which in turn helps influence our company's social impact goals and fosters a culture of belonging for all.

What is Gender Pay Gap Reporting?



Overview of reporting obligations

Employers

In Ireland, every employer with at least 250 employees on the chosen snapshot date in June 2022 must report its gender pay gap.

Employees

A "relevant employee" means an employee of a relevant employer on the relevant date and includes part-time and temporary employees. Agency staff that are contracted and paid by the agency are excluded.

When

Based on Top Oil's chosen snapshot date of 30 June 2022, the deadline for this years reporting is 30 December 2022. The findings are based on 12 months of data from 1 July 2021.

Where

The report is published on the Top Oil website (and kept online and publicly available for three years from the date of publication). There are plans for a centralised reporting portal to be created but this is not in place for 2022 reporting.

What

This report includes the statutory figures, analysis of same and indicative measures to address the gap.

Statutory Calculations

- · Mean hourly remuneration gap
- Median hourly remuneration gap
- Mean Bonus gap
- Median Bonus gap
- Mean hourly remuneration gap of part-time employees
- Median hourly remuneration gap of part-time employees
- Mean hourly remuneration gap of temporary contact employees
- Median hourly remuneration gap of temporary contract employees
- Percentage of male employees who were paid bonus remuneration & percentage of female employees who were paid bonus remuneration
- Percentage of male employees who received benefit in kind & percentage of female employees who received benefits in kind
- Percentage of males and females when divided into four quartiles ordered from lowest to highest pay

Mean & Median

The gender pay gap shows the difference between the mean (average) and median (mid-point) pay of male and female employees, expressed as a percentage of male employee's earnings Proportion of males and females in each quartile band

The proportion of male and female employees in four quartile hourly pay bands ranked from lowest hourly rate to highest hourly rate. It is done by dividing the workforce into four equal parts

Proportion of males and females receiving a bonus

The proportion of male and female employees who were paid any amount of bonus pay Proportion of males and females receiving BIK

The proportion of male and female employees who received benefit in kind (BIK)

Thank you

We look forward to answering any questions you may have