



Annual Report pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada) (the “**Supply Chains Act**”) for the fiscal year ended December 31, 2023 (the “**Reporting Period**”).

## **1 Introduction**

- 1.1 At 7-Eleven Canada, Inc. (“**7-Eleven Canada**”), we are committed to acting ethically and with integrity in all of our business dealings and relationships, and to promoting compliance with applicable laws and protecting the dignity and rights of all people connected to our business. We do not tolerate slavery or human trafficking in our organization. We hold ourselves to the highest standards and expect our business partners and suppliers (as well as their contractors, agents, subcontractors, sub-agents and labour agencies) to uphold these same principles within their operations and adhere to applicable human rights and employment standards laws. If instances arise where these expectations are not met, we will review and take appropriate actions. At the heart of our mission lies a commitment to fostering inclusive workplaces and sourcing products responsibly. This commitment is integral to our core values and operations, influencing our internal policies and the partnerships we cultivate across our supply chains.
- 1.2 This is 7-Eleven Canada’s first modern slavery report pursuant to the Supply Chains Act and covers the Reporting Period. It will be reviewed annually hereafter. Our reporting outlines the measures we have in place and the efforts we have commenced to assess and address risks of modern slavery and human trafficking in our business and supply chain. We strive to identify, prevent, and mitigate potential risks related to human rights violations, including forced labour, child labour, and human trafficking.

## **2 7-Eleven Canada’s organisational structure, business operations and supply chains**

- 2.1 7-Eleven Canada is a wholly-owned subsidiary of 7-Eleven, Inc. and is responsible for business operations across Canada. 7-Eleven Canada owns and operates approximately 600 retail & food service stores from British Columbia through to Ontario. It markets and retails proprietary, private label and national brand foods and beverages, frozen and packaged products, as well as energy (gas, EV & hydrogen), age-restricted products (tobacco, vape, and lottery), cosmetics and other retail products.
- 2.2 7-Eleven Distribution Canada Corp. is a newly formed wholly-owned subsidiary of 7-Eleven Canada that has not yet commenced business operations and did not conduct any business in the Reporting Period. While the precise business operations for 7-Eleven Distribution Canada Corp. is still being determined, its future business activities are expected to include (but may not be limited to) the sale, transportation, warehousing, delivery, and distribution of foods and beverages, frozen and packaged products, age-restricted products, energy, cosmetics and other retail products. We anticipate including 7-Eleven Distribution Canada Corp. in a joint filing of this annual report in future years, when appropriate.
- 2.3 The food and beverages, frozen and packaged products, age-restricted products, energy, cosmetics and other retail products that we purchase to resell in the Canadian market are sourced from a global network of suppliers. Our supply chain also includes ancillary services that contribute to our main operations, such as transporters and carriers.



2.4 To learn more about our business, please see <https://www.7-eleven.ca/>.

### **3 7-Eleven Canada's modern slavery risk profile**

3.1 7-Eleven Canada recognizes that our global supply chain and the industries in which we operate may present a risk of forced labour and child labour. 7-Eleven Canada will continue its efforts to identify supplier risks and map key parts of its supply chain to identify and improve its understanding of modern slavery risks.

3.2 Within 7-Eleven Canada's own business operations, the risk of forced labour and child labour is low, as all of our workers are employed in Canada and the United States, where we have fair and responsible employment practices in place.

3.3 That said, 7-Eleven Canada recognizes that supplier further down the supply chain may present a risk of modern slavery. Since such workers are not employed directly by 7-Eleven Canada, we have limited control and visibility over their working conditions and employment terms.

### **4 Steps taken to prevent and reduce risks of forced labour and child labour**

4.1 7-Eleven Canada assesses and manages risks of forced labour and child labour in its supply chain by maintaining consistent and high standards of due diligence in the environments in which 7-Eleven Canada operates.

Such processes and actions include, but are not limited to:

- (a) Providing training to all employees to foster a respectful workplace, and ensuring compliance and alignment with our Code of Conduct; and
- (b) Ensuring that robust contractual obligations are established with vendors and suppliers to reinforce compliance with our Supplier Guidelines, Supplier Requirements, and applicable modern slavery legislation.

### **5 7-Eleven Canada's policies on modern slavery**

5.1 Through formal policies, codes of conduct for colleagues, and robust guidelines and requirements for vendors and suppliers, we strive to uphold the rights of customers, colleagues and employees, as well as the many workers across our supply chain. 7-Eleven Canada is committed to protecting human rights, founded on a strong belief in doing what is right, with a view to creating a safe and inclusive experience for all colleagues and workers across our value chain and the many customers who choose to do business with us.

5.2 At 7-Eleven Canada, we recognize that respecting human rights is a shared responsibility and our Code of Conduct ("**Code of Conduct**") is the roadmap that we follow to ensure our collective commitment to the highest standards of ethics and integrity. It applies to all of our employees, officers, and directors. The Code of Conduct clearly sets out our collective commitment to respecting human rights and our prohibition on forced or child labour. Actual or possible violations of our Code of Conduct, including with respect to human rights, are required to be reported, in order to take appropriate action to review and address issues.



- 5.3 7-Eleven Canada's approach to human rights addresses the risk of modern slavery and is supported by our robust vendor/supplier guidelines ("**Supplier Guidelines**") and supplier requirements ("**Supplier Requirements**").
- 5.4 7-Eleven Canada's supplier and vendor relationships are guided by the Supplier Guidelines. It applies to any vendor or supplier of any products or services to 7-Eleven Canada. By entering into standard terms and conditions or other contractual agreements with 7-Eleven Canada, suppliers and vendors accept the terms of the Supplier Guidelines and affirm compliance with its requirements. The Supplier Guidelines set minimum expectations and guidelines for suppliers and vendors, and obligates them to comply with applicable laws, including those regulations related to forced and child labour. It focuses on worker rights and protections, with a particular emphasis on prohibiting child, forced and trafficked labour, as well as any discrimination, intimidation, abuse, harassment or violence against these workers. All vendors and suppliers are required to demonstrate compliance with the requirements set forth in the Supplier Guidelines and must report any suspected unethical or illegal practices to 7-Eleven Canada. 7-Eleven Canada keeps records of all contractual counterparties, and our supplier contracts generally contain risk mitigation and enforcement provisions, including audit rights for 7-Eleven Canada and termination rights based on material breach of contract.
- 5.5 In addition to the Supplier Guidelines, 7-Eleven Canada's Supplier Requirements mandate that suppliers, among other things, abide by all applicable laws, including without limitation, employment standards, labour, non-discrimination, environmental protection, and human rights legislation. Pursuant to the Supplier Requirements, 7-Eleven Canada prohibits suppliers from the use of all forms of forced, incarcerated, and indentured labour or human trafficking and will not work with suppliers who use these types of labour in conducting their business or who use suppliers or vendors that may use these types of labour. Our Supplier Requirements condemn the use of child labour involving any child under 14 or in violation of any age-related labour law and prohibits suppliers from using such labour or partnering with other parties in the supply chain who use such labour. Under the Supplier Requirements, suppliers are also responsible for ensuring that their hiring practices are both ethical and compliant with all applicable laws, which includes keeping records validating each employee's eligibility to work and providing copies of such records to 7-Eleven Canada within 24 hours of its request for such records.

## **6 Due diligence processes**

- 6.1 We are constantly in the process of reviewing and improving our approach to supplier due diligence.
- 6.2 7-Eleven Canada seeks to do business with suppliers that have similar values, ethics and moral business practices, including those related to human rights. 7-Eleven Canada will not tolerate any form of modern slavery and human trafficking within its supply chain.
- 6.3 To ensure all suppliers and contractors in our supply chain comply with our values, we ask our suppliers to conform to our Supplier Guidelines and Supplier Requirements.

## **7 Training**

- 7.1 Understanding and complying with our Code of Conduct is a condition of working at 7-Eleven Canada, and in addition to signing an acknowledgement to our Employee Handbook (which



includes our Code of Conduct and related policies, guidelines and procedures), employees must also undergo and complete designated training programs, including annual discrimination, bullying, and harassment training. We regularly work with our legal counsel and other professional advisors to review and update our training materials and programs to ensure best practices are adopted and implemented.

- 7.2 In order to further develop the above-mentioned policies, we plan to incorporate information regarding modern slavery risks in our employee onboarding materials.

## **8 7-Eleven Canada's approach to remediation measures**

- 8.1 Over the course of the Reporting Period, 7-Eleven Canada has not identified any instances of forced labour and child labour within its business and supply chain, and therefore, 7-Eleven Canada has not been required to take remedial measures, and no remedial measures have led to loss of income to vulnerable families.

- 8.2 Should 7-Eleven Canada identify an issue of forced labour or child labour within any of its suppliers' businesses, it is committed to employing a multifaceted approach to address the situation effectively. This approach incorporates a range of strategies, which includes exploring contractual avenues, leveraging its partnership with the supplier to develop a corrective action plan that will comprehensively address the issue, or terminate the arrangement.

- 8.3 Within our Supplier Code, vendors and suppliers are required to monitor the compliance of their operations with the terms of the Supplier Code and report any known violations to 7-Eleven Canada. Should a vendor or supplier fail to comply with the Supplier Code, 7-Eleven Canada reserves the right to require corrective action. 7-Eleven Canada will take appropriate action when a vendor or supplier fails to implement corrective action or fails to comply with the Supplier Code.

## **9 Assessing effectiveness in combatting modern slavery risks**

- 9.1 To date, 7-Eleven Canada has not had the opportunity to formally assess the effectiveness of our actions in preventing and reducing risks of modern slavery in our activities and supply chain.

## **10 Approval**

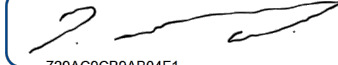
This modern slavery report, made in accordance with the Supply Chains Act, by 7-Eleven Canada, Inc. was approved by the Board of Directors of 7-Eleven Canada, Inc. pursuant to Paragraph 11(4)(a) of the Supply Chains Act on May 29, 2024.

In accordance with the requirements of the Supply Chains Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the Report for 7-Eleven Canada. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the Report is true, accurate and complete in all material respects for the purposes of the Supply Chains Act, for the reporting year listed above.

Dated: May 29, 2024



**7-ELEVEN CANADA, INC.**

DocuSigned by:  


By: \_\_\_\_\_  
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Name: Justin Mooney  
Title: Director

I have the authority to bind the corporation.