

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, 2024 (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 report outlines the measures we have in place and the efforts we have undertaken to assess and address risks of forced labour and child labour in our business and supply chain during the Reporting Period. We strive to identify, prevent, and mitigate potential risks related to human rights violations, including forced labour, child labour, and human trafficking.

# 2 Structure, activities and supply chains

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

# 3 Steps taken to assess and manage risks of forced labour or child labour in our business and supply chains

7-Eleven Canada has a large number of suppliers, which provide us with the wide range of goods and services required to stock our retail and food service stores. We seek to do business with suppliers that have values and ethical business practices similar to ours, including those related to human rights. We have robust procurement systems and processes that mitigate the risks of forced labour and child labour in our business and supply chains. We primarily source our products from leading national and multinational corporations that have publicly disclosed their commitment to addressing risks of forced labour and child labour in their own business and supply chains.



3.2 It is by partnering with suppliers who share our commitment to ethical conduct and human rights that we can create a more responsible and sustainable supply chain. 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. 7-Eleven Canada's approach to human rights is supported by our robust vendor/supplier guidelines ("Supplier Guidelines") and supplier requirements ("Supplier Requirements"). To ensure that all our suppliers comply with our values, we ask our suppliers to conform to our Supplier Guidelines and Supplier Requirements.

#### **Code of Conduct**

3.3 At 7-Eleven Canada, we recognize that respecting human rights is a shared responsibility. Our 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 commitment to respecting human rights and our prohibition of forced and child labour. Actual or possible violations of our Code of Conduct are required to be reported, and we take appropriate action to review and address any issues raised.

#### **Supplier Guidelines**

3.4 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 (such as the Supplier Guaranty further described below) 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 sets 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 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.

### **Supplier Requirements**

3.5 In addition to the Supplier Guidelines, 7-Eleven Canada's Supplier Requirements mandates 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. The Supplier Requirements condemns 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.

### **Supplier Guaranty**

7-Eleven Canada obtains contractual engagements from its suppliers to adhere to the principles stated in its Supplier Guidelines by entering into a Guaranty, Indemnification, and Insurance Agreement (the "Supplier Guaranty"), pursuant to which the suppliers (i) represent, warrant and guarantee that they are in compliance and will comply with the Supplier Guidelines, and (ii) represent that they do not use any forced labour or child labour. Through the Supplier Guaranty, 7-Eleven Canada reserves the right to conduct an audit of the suppliers' facilities and documents to verify compliance with the Supplier Guaranty and 7-Eleven Canada's other policies regarding forced labour and child labour. The Supplier Guaranty also creates a duty for suppliers to immediately notify 7-Eleven Canada of any reason to suspect a violation of the agreement.

# Training provided to employees on forced labour and child labour

- 3.7 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.
- 3.8 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.

#### 4 Remediation measures

- 4.1 Over the course of the Reporting Period, 7-Eleven Canada has not identified any instances of forced labour or child labour within its business or supply chain, and therefore, 7-Eleven Canada has not been required to take measures to remediate forced labour, child labour, or the loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour.
- 4.2 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 terminating the arrangement.
- 4.3 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.

#### 5 Assessing effectiveness in ensuring that forced labour and child labour are not being used

5.1 To date. 7-Eleven Canada has not had the opportunity to formally assess the effectiveness of our actions in preventing and reducing risks of forced labour and child labour in our activities and supply chain.

#### 6 **Approval**

This report made in accordance with the Supply Chains Act 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 26, 2025.

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 26, 2025

## 7-ELEVEN CANADA, INC.

Justin Mooney

Signed by:

Name: Justin Mooney

Title: Director

I have the authority to bind the corporation.