2023/24 financial year

Modern Slavery Statement (MSS)

ELEVEN

## 7-ELEVEN JOINT Modern Slavery Statement

#### Acknowledgment of Country

7-Eleven acknowledges all Aboriginal and Torres Strait Islander Traditional Custodians of Country and recognizes their continuing connection to land, sea, culture and community.

We pay our respects to Elders past, present and emerging.

Photo taken along the Yarra River where the Wurundjeri people of the Kulin Nation share a strong connection and history with the Yarra's land and waterways.





### Contents

A message from CEO Angus McKay
SECTION 1 About this Modern Slavery Statement
SECTION 2
Our Business at a Glance

SECTI	ON 3
1	<b>WSS Governance and Implementation</b>
CEOTI	014
SECTI	ON 4
1	Tracking Progress
7	Tracking Progress
ECTI	ON 5
l l	Risk Analysis and Actions - Operations

<b>13</b>	SECTION 6	<b>22</b>
13	Risk Analysis and Actions - Supply Chain	22
<b>17</b>	SECTION 7	<b>27</b>
17	Outlook	27
<b>19</b> 19	SECTION 8 Correction to 2021 and 2022 Statements Statement of Approval	<b>29</b> 29 29

# Doing what's right in a rapidly changing world.

A message from CEO Angus McKay

I am pleased to endorse our Modern Slavery Statement (MSS or Statement) covering the year ending 30 June 2023.

At 7-Eleven, the way we go about our work must be consistent with our four values of Reach Higher, Do What's Right, Delight Customers and Thrive Together.

Modern slavery remains an urgent global challenge and our value 'Do What's Right' is lived through our commitment to addressing modern slavery risks across our operations and supply chains. This value also guides our policies, practices, standards and governance within our own business and those businesses with which we partner.

4 \_\_\_\_\_ 5 \_\_\_\_ 6 \_\_\_\_ 7 -

3

2

As the largest player in the Australian convenience sector, it's important for 7-Eleven to lead by example in implementing real measures that minimise the risks of modern slavery in our supply chains. While about 99% of our annual procurement spend is conducted with Australian-based entities operating under this country's laws, we must still be alert to any risks in our supply chains.

I am proud of the progress we have made in this period, in particular the work to embed our Modern Slavery policies, practices and procedures across our business. From the 7-Eleven Board and Senior Leadership Team to our store team members, our business is committed to addressing the risk of modern slavery in our operations and supply chains. I encourage you to review this Statement to gain a deeper understanding of our business, our progress and our future commitments in combatting modern slavery at 7-Eleven.

Angus McKay CEO and Managing Director, 7-Eleven Stores Pty Ltd 1 December 2023



#### During FY23, 7-Eleven undertook the following initiatives:

- Our iconic freshly ground coffee is now made with Fairtrade certified coffee beans, which are roasted locally in Melbourne, a clear demonstration of our commitment to ethically source high-risk commodities, and an important step towards achieving our sustainability strategy commitments around enabling sustainable food systems.
- We have set clear brand guidelines on the responsible procurement of commodities that represent higher modern slavery and environmental risks, such as cocoa, palm oil, soy, tea and cotton.
- We have continued to deliver a leading Modern Slavery Training Module to all our head office support staff, corporate and franchise store team members. To date, 99% of support staff have completed the training module, along with 97% of corporate and franchise store team members.
- We've continued to engage our suppliers on 7-Eleven's Modern Slavery Policy and objectives through supplier events and development of an external training module tailored for suppliers, to reinforce and promote our modern slavery risk policies, including our Code of Conduct and Whistleblower policies.

- We undertook a comprehensive review of our key supplier contracts, to identify contracts that did not include contractual terms dealing with modern slavery obligations of suppliers across their operations and supply chains. From this, we developed an action plan to incorporate modern slavery contract terms.
- We continued to build our capabilities in the utilisation of the Sedex tool for supplier site risk assessment and monitoring, having successfully linked twenty (20) of our key suppliers and their sites, a key step in improving the transparency of our supply chain risks.
- We successfully ran workshops with 7-Eleven product and service owners, running simulations of potential instances of modern slavery, to test reporting and grievance mechanisms, in the context of 7-Eleven's Modern Slavery and Whistleblower policies.

#### In FY24, we plan to undertake the following activities:

- Continue engagement with small-to-medium suppliers by providing education and training on 7-Eleven's Modern Slavery Policy and objectives via our external training module.
- Continue delivering modern slavery training to all our store managers and team members in both corporate and franchisee stores.
- Engage with 7-Eleven branded product and service suppliers to address contracts that do not currently include modern slavery obligations.
- Continue to map and assess the modern slavery risks of the sites of our 7-Eleven branded product and service suppliers.
- Develop a comprehensive modern slavery supply risk monitoring and management framework.
- Complete our annual supplier modern slavery risk assessment.



### About this Modern Slavery Statement

3

2 -

4 -

This Modern Slavery Statement (MSS or Statement) is made on behalf of, and developed in consultation with, the reporting entities Convenience Group Holdings Pty Ltd (ACN 662 201 274), 7 Holdings Pty Ltd (ACN 005 620 851), 7-Eleven Stores Pty Ltd (ACN 005 299 427), Convenience Holdings Pty Ltd (ACN 143 746 356), SEA Plant & Equipment Pty Ltd (ACN 601 889 614) and 7-Eleven Australia Pty Ltd (ACN 637 676 558) (together, 7-Eleven, the reporting entities, we, us, our, or the group) pursuant to the Modern Slavery Act 2018 (Cth) (the Act). It sets out the actions we have taken to identify, assess, and address modern slavery risks across our operations and supply chain in the 12 months ending 30 June 2023. All data presented in this Statement is also for the same period.

Through our values, words and actions we support the goals and intent of the Act and are committed to identifying and addressing any risks or impacts of modern slavery in our operations and supply chain.

#### Legal structure

Convenience Group Holdings Pty Ltd, the holding company of 7 Holdings Pty Ltd, is a privately held company owned by the Withers and Barlow families. It was incorporated on 5 September 2022.

7 Holdings Pty Ltd is a wholly-owned subsidiary of Convenience Group Holdings Pty Ltd and the parent company of 7-Eleven. The company has a license to operate and franchise 7-Eleven stores in Australia from the US-based 7-Eleven Inc.

7-Eleven Stores Pty Ltd is a wholly-owned subsidiary of 7 Holdings Pty Ltd with responsibility for 7-Eleven's Franchise-operated stores.

Convenience Holdings Pty Ltd is a wholly-owned subsidiary of 7 Holdings Pty Ltd with responsibility for 7-Eleven's company-operated stores.

SEA Plant & Equipment Pty Ltd is a privately held company also owned by the Withers and Barlow families. The company owns certain store and fuel equipment used in the 7-Eleven business.

7-Eleven Australia Pty Ltd is a wholly-owned subsidiary of SEA Plant & Equipment Pty Ltd and operates the supply chain business of the group by supplying merchandise inventory to the 7-Eleven convenience store network. 7-Eleven Australia Pty Ltd enters into supply contracts and undertakes the purchasing, logistics and procurement functions for 7-Eleven Stores Pty Ltd and its franchisees.

All six reporting entities are incorporated in Australia. Their registered offices are in Richmond, Victoria.

The six reporting entities have common governance with the same directors wholly responsible for the affairs of the companies. The existing policies, including those which relate to identifying and managing modern slavery and human rights risks, apply across all six entities and all six share the same, centralised functional support – including procurement and human resources.

- 5 ---- 6 ---- 7 -

This shared governance framework results in a common approach to assessing and addressing risks of modern slavery across the six reporting entities, and will also ensure a shared approach to rolling out the various commitments, processes and policies outlined in this MSS.

This MSS provides a single, consolidated description of the actions to address modern slavery across all six reporting entities. This MSS was developed through consultation between all six reporting entities and their shared directors and has been approved by the respective Boards for each reporting entity.

#### Internal consultation

We are committed to developing and maintaining a robust group-wide response to modern slavery. In preparing this MSS, 7-Eleven consulted with our directors and management across all six reporting entities through our Modern Slavery Committee (the Committee). Formed in early 2020, the Committee's role is to evaluate the risks, recommend action and embed modern slavery due diligence practices throughout the group. In this reporting period, consultation through the Committee involved consideration of modern slavery risks across the group, including engagement with Tier 1 suppliers regarding our Tier 2 supply chain, agreement on specific commitments to address modern slavery risks within the group, including those in relation to the Modern Slavery Policy and workplan, and a review of the text of this MSS. Further detail on the Committee's function is set out in Section 3 of this MSS.

This MSS is signed by Angus McKay, CEO and Director of Convenience Group Holdings Pty Ltd, SEA Plant & Equipment Pty Ltd and 7-Eleven Australia Pty Ltd.

For more details, see the Statement of Approval in Section 8.

### Our Business at a Glance

7-Eleven's purpose is to make every day easier, so that Australians can live a good life. We continually strive to deliver a wonderful customer experience, through our network of fuel and non-fuel convenience stores.

Here is an 'at a glance' version of our operations, supply chain and procurement functions.

ELEVEN

Snacks

ELEVEN

Breakfast

7-ELEVEN HOLDINGS | MODERN SLAVERY STATEMENT 2023

#### Operations



8 customers served per second.

# **250M**

Circa 250 million transactions per year.

3

X

i



COMPANY

32%

value share of the convenience market across NSW, VIC, QLD and WA.

11%

volume share of the petrol retail market across NSW, VIC, QLD and WA.

One

of the largest private companies in Australia.

4 \_\_\_\_\_ 6 \_\_\_\_ 7 \_\_\_\_ 8

Section 2: Our Business at a Glance (continued)



735+

stores across VIC, NSW, ACT, QLD and WA – franchised and corporate.

450+

family franchise businesses operating about 500 stores.

9,100+

team members

Unique franchise model where partnership is key and success is shared.

#### **Team members**

Our 9,100+ team members across all reporting entities consist of corporate office, corporate store and franchisee store employees, and team members are provided with consistent training and support across all these parts of the business. This equips them with the expertise and tools to identify risks, take action and ensure our policies are upheld across the board, including for modern slavery.

#### Table 1: Composition of 7-Eleven team

WORK TYPE*	SUPPORT OFFICES	CORPORATE STORES	FRANCHISE STORES	TOTAL
FULLTIME	533	322	284	1,139
PART TIME	41	15	197	253
CASUAL/TEMPORARY	31	2,563	5,130	7,724
TOTAL	605	2,900	5,611	9,116

- 5 -

4 -

3

6 7 8

\* Figures current as at 30 June 2023





### Supply chain and procurement



We operate a shared supply chain across 7 Holdings Pty Ltd, 7-Eleven Stores Pty Ltd, **Convenience Group Holdings** Pty Ltd, 7-Eleven Australia Pty Ltd, SEA Plant and Equipment Pty Ltd and Convenience Holdings Pty Ltd. For this MSS, any references to supply chain describes the business relationship between the six reporting entities and our suppliers.



Most goods and services are centrally procured by the reporting entities.



We sell 7-Eleven branded (such as Slurpee®) and proprietary branded products (e.g. Mobil fuel).



Our franchisees can, and do, directly procure and sell goods and services procured direct to store and outside of the centralised procurement function.

# 6,000+ 99% 12

different goods and services are procured annually.

2,000+

suppliers of different goods and services.

of our procurement is conducted with Australianbased entities.

countries where our Tier 1 suppliers are based: Australia (99% of spend), Canada, Ireland, New Zealand, Singapore, South Korea, USA, United Kingdom, Denmark, Hong Kong, Israel, and Sweden.

4 \_\_\_\_ 5 \_\_\_\_ 6 \_\_\_\_ 7 \_\_\_\_ 8 3



#### **Tier 1 suppliers**

- More than 2,000 suppliers from whom we procure goods and services.
- Supply finished goods for sale, including \_ 7-Eleven branded products like Slurpee® and products sold under other well-known brands.
- Provide consumable items not for sale, \_ like utensils used in stores, and services, such as facilities management.
- We aim to engage in long-term partnerships with suppliers who meet our quality and supply standards.
- Includes aggregators, manufacturers, and direct service providers. Our supplier assessment process includes assessing whether the supplier will provide the goods or services directly, or via a Tier 2 supplier. The closer our relationship to suppliers and manufacturers, the more effectively we can ensure appropriate quality and standards are in place.



#### **Tier 2 suppliers**

- Supply components or raw materials to our Tier 1 suppliers, who then supply us with finished goods.
- Operate within more complex, \_ global supply chains.
- Require strong oversight and \_ monitoring both directly and by our Tier 1 suppliers, given the potential for the increased risk of modern slavery.



#### Table 2: Examples of goods and services procured from Tier 1 suppliers

PROCUREMENT CATEGORIES	PRODUCT AND SERVICES EXAMPLES	<b>PROCUREMENT CATEGORIES</b>	PRODUCT AND SERVICES EXAMPLES
FOOD & HOUSEHOLD GROCERIES	Baked goods, milk, soft drinks, chocolate bars, loose confectionery, juices, chewing gum and health snacks.	FINANCIAL PRODUCTS & SERVICES	Parcel delivery, transport tickets, vouchers, 7-Eleven gift cards, international money transfer (to 15 May 2023) and ATM.
ТОВАССО	Cigarettes, cigars, packaged tobacco and smoking accessories (excluding vaping products).	INFORMATION TECHNOLOGY	App development, risk management software, infrastructure support and hardware.
ASSETS CONSTRUCTION AND ENVIRONMENT	Trades and general maintenance including coffee machine and fuel pump maintenance, as well as safety, security and sanitation.	PACKAGING	Paper bags, coffee cups, Slurpee® cups, donut trays and coffee trays.
CORPORATE SERVICES	Mail and cargo, paper and printing services, and training services.	LOGISTICS & SUPPLY CHAIN	Warehousing services and transport of goods to our stores.
MARKETING	Advertising and marketing, including creative services and point of sale materials.	PROFESSIONAL SERVICES	Advisory and legal services.
BEVERAGE	Coffee, tea bags, shakes and Slurpee® ingredients.	FUEL	LPG, diesel, unleaded petrol and E10.
COMPLEMENTARY PRODUCTS	Cups, lids, straws, sweeteners, sauces, salt, utensils and sugar syrup.	PROPERTY	Property development and leasing.
STORE SUPPLIES	Includes cleaning equipment such as brooms, wipes, single use gloves and mops.	OTHER	Phones, magazines, maps, directories and newspapers.



### Modern Slavery Governance and Implementation

- 6 -

5



#### Governance

As a leader in fuel and convenience retailing in Australia, we recognise our critical role in promoting and ensuring human rights and equality generally, and specifically for our team members, customers and in our supply chains.

People are at the centre of everything we do at 7-Eleven. The health, safety and welfare of the people who work for us, purchase goods and services from us, and supply our operations is a critical priority.

We respect and uphold all applicable laws relating to workers' rights, and we look beyond this level of compliance to find ways to positively impact the outcomes of people involved with and integral to 7 Eleven.

We are committed to addressing and mitigating the risks of modern slavery in our operations and supply chains by improving the effectiveness of our systems and controls. The Board of Convenience Group Holdings Pty Ltd (being the principal governing body of Convenience Group Holdings Pty Ltd, the parent entity of 7 Holdings Pty Ltd, 7-Eleven Stores Pty and Convenience Holdings Pty Ltd) and the Board of SEA Plant & Equipment Pty Ltd (being the principal governing body of SEA Plant & Equipment Pty Ltd, the parent entity of 7-Eleven Australia Pty Ltd) are responsible for approving this MSS, and our joint Boards' Audit, Compliance and Risk Committee (ACRC) is responsible for monitoring commitment implementation across all the reporting entities.

The ACRC was chaired during the year ending 30 June 2023 by Non-Executive Director Sandra Birkensleigh and met quarterly. It included Non-Executive Directors Chris Barlow, Michael Smith, Mark Powell and CEO and Managing Director Angus McKay.

Our Senior Leadership Team (SLT), led by Angus McKay, is accountable for managing and addressing any 7-Eleven modern slavery risks.

#### Modern Slavery Committee

Our Modern Slavery Committee was formed in 2020 and meets monthly. The Committee leads the implementation of all MSS commitments, and its remit covers all the reporting entities.

In the year ending 30 June 2023, the Committee was chaired by the 7-Eleven Sustainability Manager. Committee members included senior representatives from Procurement, Customer Experience, Human Resources, Public Affairs, Legal, Risk, Channel (Store) and Product Experience.

Modern slavery risks, mitigation and management strategies are presented to our SLT by the Committee as part of quarterly updates, and to the Board annually for discussion and endorsement.

(i) \_\_\_\_\_ 1 \_\_\_\_ 2 \_\_\_\_\_ 3

#### Structure chart

\_\_\_\_\_ 4 \_\_\_\_ 5 \_\_\_\_ 6 \_\_\_\_ 7 \_\_\_\_ 8

				7-Eleven	Board			
N	<b>Michael Smith</b>	ı	Angus Mo	кау	Marina Go		Mark Powell	
	Non-Executive Board Chairpe			cutive Officer ng Director	Non-Executi	ve Director	Non-Executive Dire	ector
Chris Barlow		Sandra Birkensleigh		Dharmendra (Dharma) Chandra				
Ν	Non-Executive	e Director		utive Director	Non-Executi	ve Director		
			Α	udit, Risk and Co	ompliance Co	mmittee		
Sandra Birk	kensleigh	Angus N	ЛсКау	Michael	Smith	Chris Barlov	v Mar	k Powell
Non-Execut Committee	itive Director e Chair)		ecutive Offic ging Director		cutive Directo nairperson)	r Non-Executi	ve Director Nor	n-Executive Direct
				Senior Leaders	hip Team (SLT	)		
А	Angus McKay		Julie Layo	ock	Daniel Wyat	t	Matt Keogh	
		General Manager C Customer Experience		Chief Financial Officer		General Manager Product Experience		
8	& Managing D	irector	Customer	Experience			Product Experience	e
	& Managing D <b>Fiona Hayes</b>	irector	Customer Sharon Be		Stephen Eye	ears	Product Experience	e -
F	Fiona Hayes		Sharon Be	aumont	<b>Stephen Eye</b> General Mar			e
F	0 0			eaumont lanager		nager	James Wyatt	e
F	Fiona Hayes General Manag		<b>Sharon Be</b> General N	eaumont lanager	General Mar	nager	James Wyatt (to May 2023)	26
F	Fiona Hayes General Manag		Sharon Be General M People & S	eaumont lanager	General Mar Strategy & Te	nager echnology	James Wyatt (to May 2023)	же 
F	Fiona Hayes General Mana, Channel		Sharon Be General M People & S	eaumont lanager Safety	General Mar Strategy & Te	nager echnology	James Wyatt (to May 2023)	Novka Lacey
F C C Paul Sirant	Fiona Hayes General Manae Channel	ger	Sharon Be General M People & S Mode	eaumont lanager Safety rn Slavery Comm	General Mar Strategy & Te	echnology entation Gorton	<b>James Wyatt</b> (to May 2023) General Counsel	
F C C Paul Sirant Chapter Me	Fiona Hayes General Manae Channel	ger Fiona Baxter	Sharon Be General M People & S Mode nber 2022)	eaumont lanager Safety rn Slavery Comm Christian Burns	General Mar Strategy & Te iittee Represe David Area Le	echnology entation Gorton	James Wyatt (to May 2023) General Counsel Adam Lovie	Novka Lacey
Paul Sirant Chapter Me	Fiona Hayes General Manae Channel ember ity	ger Fiona Baxter (from Septer	Sharon Be General M People & S Mode nber 2022)	aumont lanager Safety rn Slavery Comm Christian Burns (to March 2023)	General Mar Strategy & Te iittee Represe David Area Le	echnology entation Gorton ead	James Wyatt (to May 2023) General Counsel Adam Lovie Chapter Lead Food Category (to Dec 2022),	Novka Lacey Chapter Memb
F G C Paul Sirant Chapter Me Sustainabilit Chairperso	Fiona Hayes General Manae Channel Channel ember ity on)	ger Fiona Baxter (from Septer Chapter Leac	Sharon Be General M People & S Mode nber 2022)	aaumont lanager Safety rn Slavery Comm Christian Burns (to March 2023) Area Lead	General Mar Strategy & Te iittee Represe David Area Le	echnology entation Gorton Compliance	James Wyatt (to May 2023) General Counsel Adam Lovie Chapter Lead Food Category (to Dec 2022), Product Owner	<b>Novka Lacey</b> Chapter Memb Senior Legal Counsel
F	Fiona Hayes General Manae Channel ember ity on)	ger Fiona Baxter (from Septer Chapter Leac Sustainability	Sharon Be General M People & S Mode nber 2022)	aaumont lanager Safety on Slavery Comm Christian Burns (to March 2023) Area Lead Procurement	General Mar Strategy & Te iittee Represe David Area Le Risk & O Maya F	echnology entation Gorton Compliance	James Wyatt (to May 2023) General Counsel Adam Lovie Chapter Lead Food Category (to Dec 2022),	Novka Lace Chapter Mer Senior Legal Counsel

#### **Modern Slavery Policy**

We have developed and published our Modern Slavery Policy (Policy). The Policy applies to all 7-Eleven's employees, franchisees, suppliers, officers, directors and team members. It will help us manage the risks of modern slavery across our operations and supply chain and ensure we develop a shared understanding of our modern slavery expectations. In this reporting period, we delivered Policy training to key team members across the business and will continue to roll out this training to store managers and store team members during the next reporting period via on-boarding and online compliance training.

#### **Policy objectives**

Our objectives are clearly set out within the Policy and to meet them we require all persons working for or on behalf of 7-Eleven to comply with the following principles:

- 1. Read, comprehend and comply with the Policy.
- 2. Comply with all relevant modern slavery laws and regulations, such as the Act.
- 3. Avoid any activity that might lead to, or suggest, a breach of the Policy.
- 4. Proactively identify, assess, mitigate and remediate (where appropriate) modern slavery risks and impacts in 7 Eleven's operations and supply chains.
- 5. Adopt appropriate due diligence on suppliers coupled with, where appropriate, requirements that they implement relevant procedures that comply with the Policy.

×

- 6. Conduct and complete required training so that individuals can recognise modern slavery risks, practices and take steps to avoid such practices.
- 7. Communicate the Policy and related legislation and documents to all relevant parties including team members, business partners and suppliers.

2 -

- 3

4

5



FANTRADE

- 6 ---- 7 --

- 8

#### We also require, as a minimum, that all 7-Eleven suppliers:

- Do not engage in any form of modern
- Adhere to all applicable domestic
- Take reasonable steps to ensure that any subcontractor, independent contractor, or supplier engaged in connection with the performance of their obligations to 7-Eleven does not engage in any form of modern slavery and adheres to all applicable

Photograph by Julio Cesar Huber.

#### Modern slavery workplan

Our modern slavery workplan is organisation-wide and ensures we identify clear and effective steps towards achieving our current and future MSS commitments. The workplan allocates clear ownership of commitments, provides transparent measurement, timeframes and defines key results. Progress against the workplan is reported quarterly to the SLT, however the workplan is a "living" document and is discussed within our business as part of agile quarterly business reviews.

### Sustainability function and strategy

The strategy is centrally governed through the Sustainability Chapter with commitments owned across the enterprise, including key stakeholders from Product, Channel, Finance, People and Customer tribes. The Sustainability Chapter engage the business on modern slavery, responsible sourcing and other sustainability initiatives and commitments as laid out in our quarterly business horizons. food systems and human health.

### Other relevant policies and strategies

Our existing organisation-wide Code of Conduct provides the framework for how all team members should conduct themselves to promote the values and behaviours of 7-Eleven. It is communicated to all team members who join the business and training is refreshed for all team members on a two-yearly cycle.

Our monitoring and remediation processes include a Whistleblower Policy and function which provides a channel for all employees, franchisees, team members, family members, former employees and team members, consultants, contractors and suppliers to confidentially raise concerns. These concerns may include misconduct, unethical or illegal activity (including modern slavery in our operations and supply chains) as well as any breaches of our Code of Conduct or the Whistleblower Policy. Matters raised through this channel are taken extremely seriously by the Board and the SLT. Complaints are investigated and, where necessary, steps taken to resolve the complaint.

A key focus for FY24 will be the development of a modern slavery supply risk monitoring and management framework, which will clarify supplier due diligence processes for managing and remediating risks.

### Modern Slavery Strategy



Setting Baselines and Targets:

Completed in FY23

Building Internal Capability: Ongoing



Supplier Engagement: Initiated



Communicating Impact: Ongoing

- 8



꽃

i

- 1

### **Tracking Progress**

Across our business, we continue to develop a systematic approach to measuring the effectiveness of our systems and processes in managing modern slavery risks in our operations and supply chain.

#### Measuring our effectiveness now and beyond

We have and will continue to measure our effectiveness across the reporting entities using the framework below to track progress.

- 2

3

- 5 -

- 6

7 -

- 8



Continue engagement with our small-to-

medium suppliers through provision of

The table below sets out our progress against the commitments made under our previous MSS.

Table 3: Progress on commitments for the year ending 30 June 2023

#### **COMMITMENTS 2022 MSS**

1

#### **PROGRESS IN FY23**

training on 7-Eleven's Modern Slavery Policy 2023. Over 250 suppliers attended these events. and objectives. 2 Continue delivering modern slavery Training was delivered through the 7-Eleven human resources training to all our store managers and team portal. As at 30 June (2023) 99% of support staff have completed members (corporate and franchisee). the training module, along with 97% of corporate store team members and 97% of franchise store team members. 3 Review existing supplier contracts to A comprehensive review was completed to identify contracts ensure that contract terms set adequately that do not include modern slavery obligations for suppliers in respect of their operations and supply chains. An action plan clear expectations around identifying and addressing all forms of modern slavery was developed to address supplier modern slavery contractual obligations, commencing FY24. across our operations and supply chains. Conduct a Sedex audit assessment with Onboarded twenty (20) of our key suppliers and their sites on Sedex. Δ key suppliers in higher risk commodity categories. Review the effectiveness of modern slavery Completed two workshops with 7-Eleven product and service 5 escalation processes outlined through a owners, running simulations of potential modern slavery instances, simulation assessment to test end to end to test understanding of reporting, escalation and grievance event resolution. mechanisms, in the context of 7-Eleven's Modern Slavery and Whistleblower policies.

— 3 —

- 2 -

6 Refresh our supplier risk assessment.

Supplier evaluation completed. Trialled the use of a new risk assessment tool on Sedex, combining inherent country and sector risks with supplier-specific information.

- 6 -

- 5

Engagement of suppliers on 7-Eleven's Modern Slavery Policy and

objectives continued through supplier event days held in April



24 - C

### **SECTION 5 Risk Analysis and Actions - Operations**



3

2

- 6

### **Risk identification** and assessment

We recognise that modern slavery risk exists in our own direct operations and take steps to mitigate and monitor this risk.

Store-based labour violations are associated with an inherent risk of modern slavery and are closely monitored. While employment law breaches are different to modern slavery, we treat any such violations extremely seriously.

During the year ending 30 June 2023 we have found no instances of modern slavery in our operations.

The table below sets out the exposure and residual risk of causing, contributing to or being directly linked to modern slavery risks within our operations.

#### Table 4: Risk of modern slavery

#### **OPERATIONS AREA** RISK

SUPPORT OFFICES	Most support office team members are employed full-time, have secure migration status and are generally in permanent employment.
STORES	Many of our store team members hold temporary visas and are employed on a casual basis. We understand these factors put workers at higher risk of exploitation and we have developed several controls to manage these risks.

#### **Risk management and mitigation - Operations**

The systems we operate and the processes we have put in place to address underpayment risks have delivered the dual benefit of helping us assess and mitigate against risks of modern slavery. employment law and modern slavery risks. We are committed to continually improving in this area, with a view to demonstrating industry leadership.

We continue to prioritise focus, investment and collaboration with our franchisees on our operational due diligence systems. We are focused on changes in this area to ensure our due diligence program is actively attuned to the changing nature of

~~



\_\_\_\_\_ 2 \_\_\_\_ 3 \_\_\_\_ 4 \_\_\_\_\_ 5



#### Key risk management controls in place related to modern slavery – Operations

- Centralised payroll systems and processes providing enhanced oversight and monitoring measures to ensure any instances of payroll noncompliance are readily identified
- Biometric time and attendance records for all team members at sign-on and sign-off.
- Comprehensive right to work checks supported by quarterly Visa Entitlement Verification Online (VEVO) system checks for relevant team members.
- Continuous compliance monitoring technologies, including sophisticated data analytics monitoring and a reporting platform to help further identify unusual instances or patterns of behaviour as part of our general due diligence processes.
- Substantial levels of field-level investigation in our store network to monitor operational risks.
- Regular internal and external auditing to ensure our payroll complies with all relevant statutory requirements.

- Employment law compliance training programs for management, franchisees and store team members.
- A confidential, 24-hour, seven day a week hotline for any employees, team members, service providers, suppliers or family members to raise workplace wage compliance queries, issues or concerns, and a well communicated commitment to investigating any issues raised, pursuant to our Whistleblower Policy and remediation more generally.
- Franchisee access to independent external employee relations advisory services.
- Provision of The Fair Work Information Statement as part of team member on-boarding.
- Overall oversight of compliance performance and continuous improvement by the ACRC.
- Casual Employment Information Statement to all new casual team members providing these employees with information about their conditions of employment and their rights.

7-ELEVEN HOLDINGS | MODERN SLAVERY STATEMENT 2023

# Progress summary -Operations

\*

Section 5: Risk Analysis and Actions - Operations (Continued)

#### Key actions we have taken across the reporting entities' operations during this reporting period which relate to our MSS include:

- ✓ Engagement of suppliers on 7-Eleven's Modern Slavery Policy and objectives continued through supplier event days held in April 2023. Over 250 suppliers attended these events.
- ✓ Training delivered through the 7-Eleven human resources portal. As at June 30 2023, 99% of support staff have completed the training module, along with 97% of corporate store team members and 97% of franchise store team members.

- 8

i <u>1 2 3 4 5 6 7</u>

### **Risk Analysis and Actions – Supply Chain**

#### Risk identification and assessment -Supply Chain

With more than 2,000 Tier 1 suppliers providing us with more than 6,000 goods and services, our supplier risk assessments apply across the six reporting entities, are heavily focused on procurement systems and processes, and are centralised and conducted at the support office level. These risk assessments cover all products and services stocked in corporate stores, and the majority of what is stocked and provided to customers in franchisee operations.

Product risk is assessed by taking a sector-wide approach, which allows us to understand where in the supply chain the most significant risks lie. For example, for our finished goods, the risks of modern slavery are more likely to exist deep within the supply chain, such as in the sourcing of raw materials, or at processing or manufacturing sites.

Our risk assessment process looks closely at our relationship to the risks, to understand whether we could be 'causing,' contributing to' or 'directly linked to' modern slavery in our supply chain.

An analysis of risk that considers how a company might cause, contribute to, or be directly linked to modern slavery risks or practices is set out in the UN Guiding Principles and the Guidance to the Act. This analysis is important and helps guide

24

our product category assessment to ensure our immediate focus is on the highest risk areas where our relationship to the risks are closest. This approach aligns to the use of the Sedex tool for supplier site risk assessment and monitoring.

Table 5 sets out the potential exposure to modern slavery risks within our supply chain.

#### Table 5: Risks of modern slavery - Supply Chain

SUPPLY CHAIN AREA	RISK
PRODUCTION	Includes potential risks during farming and harvesting of raw materials and product manufacturing. While the specific risks will vary according to the industry, product, and country, the most associated modern slavery risks are a heavy reliance on migrant labour, forced labour and child labour.
DISTRIBUTION	Includes potential risks during road, rail and sea freight transportation, warehousing and product storage. While the specific risks will vary according to the industry and country, the most associated modern slavery risks are forced labour and deceptive recruitment practices associated with the use of subcontractors and labour hire agencies.
SERVICE	Service providers typically have a shorter supply chain. While the specific risks will vary according to the industry and country, the most associated modern slavery risks are forced labour including debt bondage, frequent use of sub- contracting and reliance on migrant labour.

i <u>1 2 3 4 5 6 7 8</u>

As previously noted, franchisees can source some of their products and services independent of the support office. We will continue to work on assessing modern slavery risk in procurement within our supply chain, and will work with all franchisees, including providing training, to help them map their own supply chains in the coming reporting periods.

During the year ended 30 June 2023, we continued to develop our supply chain risk assessment and due diligence processes, to reflect any changes in our supplier base, the industry and specific country risks to develop an overall assessment of each supplier's inherent risk. We remain committed to continuing internal risk assessment to evaluate our suppliers' alignment with our own modern slavery commitments, and delivering training on our Modern Slavery Policy and objectives to our small-to-medium suppliers in high-risk categories.

Understanding the governance our suppliers have in place to identify and mitigate modern slavery risks, and ensuring they share our commitment to eliminating them, is critical.

7-Eleven performs an annual modern slavery risk assessment to track the risk profile of 7-Eleven's supply chains. The analysis to date is based on a risk assessment tool that summarises inherent risks of modern slavery in the operations and supply chains of a business entity – linked to their site location and industry specific risk, which includes assessment against data from databases such as International Labour Organisation (ILO) and media scans for known controversies. Future assessments will also look at residual risk at key supplier sites.

\_\_ 2 \_\_\_\_ 3 \_\_\_\_ 4 \_\_\_\_ 5 \_\_\_\_ 6

- 7

- 8

7-Eleven's nominated eleven (11) key supply chain risk categories, shown in Table 6, are a result of industry specific risk and significant spend in category.



The table below sets out 7-Eleven's key risk categories.

#### HIGH RISK CATEGORY RATIONALE

#### SMOKING/TOBACCO

Third-party proprietary branded products

- Higher risks for all types of modern slavery, but in particular the use of child labour and exploitation of migrant workers in tobacco production and distribution.
- Significant category spend (greater than AUD\$100 million).



- - -

#### COFFEE

#### 7-Eleven branded products

- Higher risks of forced labour and child labour driven largely by locations of coffee production.
- Moderate category spend (up to AUD\$100 million).

#### FOOD-ON-THE-GO

7-Eleven branded products

- Higher risks in both the agricultural production and the distribution phases, in particular exploitation of migrant workers.
- Moderate category spend (up to AUD\$100 million)

#### BAKERY

7-Eleven branded products

- High inherent risk of forced labour, driven by a reliance on low skilled labour and migrant labour hire particularly within the agricultural components of bakery supply chains, such as in the growing and harvesting of wheat.
- Moderate category spend (up to AUD\$100 million)

#### CONFECTIONERY

7-Eleven branded products

- Higher risk of child labour (particularly in cocoa production), forced labour and debt bondage (particularly in sugar production and supply).
- Moderate category spend (up to AUD\$100 million).







88

HIGH RISK CATEGORY RATIONALE

#### SAFETY & SECURITY

Services

- Higher risks driven through prevalence of sub-contracting, use of labour hire companies and migrant workers.
- Moderate category spend (up to AUD\$100 million.

#### SANITATION & EXTERNAL SERVICES

#### Services

- Higher risks driven through prevalence of sub-contracting, use of labour hire companies and migrant workers.
- Moderate category spend (up to AUD\$100 million).

#### CONSTRUCTION PROJECTS FACILITIES MANAGEMENT WAREHOUSING

#### Services

- High inherent risks of forced labour within these industries in particular due to the frequency of subcontracting and opaque hiring practices.
- Moderate category spend (up to AUD\$100 million).

#### **CLOTHING & STORE UNIFORMS**

7-Eleven branded products

- The risk of all types of modern slavery is inherently high in the clothing and apparel industry – there are several known issues within textile supply chains, including child labour, forced labour and debt bondage.
- Lower category spend (up to AUD\$10 million)



i <u>1</u> <u>2</u> <u>3</u> <u>4</u> <u>5</u> <u>6</u> <u>7</u>

#### 7-ELEVEN HOLDINGS | MODERN SLAVERY STATEMENT 2023

Based on our engagement with, and feedback from suppliers, we have identified our small-to-medium sized suppliers in these categories as a priority area for us to focus on. These suppliers are generally less advanced in assessing and mitigating modern slavery risks and we see an opportunity to assist them by sharing knowledge and information and providing guidance on our expectations, processes and policies.

#### Risk management and mitigation - Supply Chain

Key risk management controls in place across our supply chain include:

- Rigorous supplier selection and due diligence processes (as outlined below)
- Contractual controls
- Identified contract and supplier relationship owners with clear accountabilities
- Performance management processes
- Audits for food safety and health and safety.

The specific controls in place for each supplier, and how those controls are applied, depends on the criticality of the supplier to the business, value of the supply relationship and the risks associated with the supplier.

These controls cover a broad range of risks and while they do not currently specifically target risks of modern slavery, they contribute to our broader understanding of our suppliers' businesses and provide us with the opportunity to identify and investigate areas of potential concern. In addition to conducting a risk assessment of our suppliers, examples of the controls that 7-Eleven has in place to assist in detecting and mitigating modern slavery in our supply chain include, standard contractual terms, the introduction and socialisation of the Policy with suppliers and the training of 7-Eleven's Procurement and Category Management teams.

Based on our evolving knowledge of modern slavery issues, market insights and tools available, we will focus on selecting and consistently applying the right controls across suppliers we have the greatest influence with, and those most strongly associated with the 7-Eleven brand. We can then progressively expand these controls across a wider selection of our suppliers, and eventually our entire supply base.

\_\_\_\_\_ 2 \_\_\_\_\_ 3 \_\_\_\_\_ 4 \_\_\_

- 5 -

- 6



Section 6: Risk Analysis and Actions - Supply Chain (Continued)

#### Case Study -Fairtrade Coffee

7-Eleven is committed to carefully sourcing commodities which may present higher modern slavery and environmental risks deep in the supply chain, including coffee, cocca, soy, tea and cotton. To mitigate this risk and demonstrate our commitment to carefully sourcing our most consumed higher-risk commodity, our coffee was certified Fairtrade from 4 October 2022.

The use of the Fairtrade chain of custody program and mark provides 7-Eleven assurance that coffee is purchased in accordance with ethical standards which ensures producers receive a fair price for their coffee beans while providing social and ecological opportunities for producer communities.

For the period ending 30 June 2023, our beans were sourced from Brazil (Arabica beans) and India (Robusta beans), from a collective of five producer organisations – collectively serving 2000+ farmers. 7-Eleven directly supported these farming communities through the Fairtrade premium – an extra payment (on top of the Fairtrade Minimum Price) that goes directly to securing the livelihoods, living conditions and ecological resilience of the farming community.

To learn more visit:

www.7eleven.com.au/products/ drinks/coffee/fairtrade-coffee.html

UNATION IFTTUNI

# Progress – Supply Chain

#### To date, and including the reporting period ending 30 June 2023, we have identified no instances of modern slavery in our supply chain.

DELIVER

8

We have adopted Sedex as the preferred platform to engage and coordinate supplier information and risk data and continue to engage and register key suppliers. Sedex is one of the world's leading ethical trade membership organisations, working with businesses to improve working conditions in global supply chains (www.sedex.com/about-us/).

Key actions we have taken relating to our supply chain during this reporting period and which relate to our MSS include:

- A comprehensive review was completed to identify contracts that do not include modern slavery obligations for suppliers in respect of their operations and supply chains. An action plan was developed to address supplier modern slavery contractual obligations, commencing FY24.
- ✓ Onboarded twenty (20) of our key suppliers and their sites onto Sedex.
- ✓ Completed two workshops with 7-Eleven product and service owners, running simulations of potential modern slavery events, to test understanding of reporting, escalation and grievance mechanisms, in the context of 7-Eleven's Modern Slavery and Whistleblower policies.
- ✓ Trialled the use of a new risk assessment tool on Sedex, combining inherent country and sector risks with supplier-specific information.

(i) \_\_\_\_\_ (2) \_\_\_\_\_ (3) \_\_\_\_\_ (4) \_\_\_\_\_ (5) \_\_\_\_ (6) \_\_\_\_\_

C

### SECTION 7 Outlook



The table below outlines our commitments for the reporting period ahead, ending 30 June 2024.

#### Table 7: Summary of FY24 commitments

#### COMMITMENTS FOR THE YEAR ENDING 30 JUNE 2024

- 1 Continue engagement with our small-to-medium suppliers through provision of training on 7-Eleven's Modern Slavery Policy and objectives.
- 2 Continue delivering modern slavery training to all our store managers and team members (corporate and franchisee).
- 3 Engage with 7-Eleven branded product and service suppliers to address contracts that do not currently include modern slavery obligations for suppliers in respect of their operations and supply chains.
- 4 Continue to map and assess modern slavery risk of the sites of our 7-Eleven branded product and service suppliers.
- 5 Complete our annual supplier modern slavery risk assessment, including key supplier site residual risks.
- 6 Develop a modern slavery supply risk monitoring and management framework.

8



We are clear on our commitment to contributing to the elimination of modern slavery globally, and we will continue to show leadership on this issue.

Our values – Reach Higher, Delight Customers, Thrive Together and Do What's Right – guide our decisions and actions.

Our journey to ensure compliance with the Act will continue.



**Reach Higher** 

**Delight Customers** 

Thrive Together



i <u>1</u> <u>2</u> <u>3</u> <u>4</u> <u>5</u> <u>6</u> <u>7</u> <u>8</u>

### **Correction and Statement of Approval**



- 2 -

- 4 ---- 5 --

- 6

#### Correction to 2021 and 2022 Statements

In preparing this Statement it has come to our attention that SEA Plant & Equipment Pty Ltd (ACN 601 889 614) and its wholly-owned subsidiary 7-Eleven Australia Pty Ltd (ACN 637 676 558) were inadvertently omitted from 7-Eleven's joint modern slavery statements for financial years ending 30 June 2021 and 30 June 2022.<sup>1</sup>

We confirm that our modern slavery statements for financial years ending 30 June 2021 and 30 June 2022 report in respect of SEA Plant & Equipment Pty Ltd and 7-Eleven Australia Pty Ltd, which form part of the 7-Eleven business.

#### Statement of Approval

This Statement was approved by the CONVENIENCE GROUP HOLDINGS PTY LTD (ACN 662 201 274) Board, the principal governing body for CONVENIENCE GROUP HOLDINGS PTY LTD on its own behalf and on behalf of its wholly owned subsidiaries 7 HOLDINGS PTY LTD (ACN 005 620 851), 7-ELEVEN STORES PTY LTD (ACN 005 299 427) and CONVENIENCE HOLDINGS PTY LTD (ACN 143 746 356); and the SEA PLANT & EQUIPMENT PTY LTD (ACN 601 889 614) Board, the principal governing body for SEA PLANT & EQUIPMENT PTY LTD on its own behalf and on behalf of its wholly-owned subsidiary 7-ELEVEN AUSTRALIA PTY LTD (ACN 637 676 558).

ha.

Angus McKay, CEO and Managing Director of 7-Eleven Stores Pty Ltd and a director of 7 Holdings Pty Ltd, Convenience Holdings Pty Ltd, Convenience Group Holdings Pty Ltd, SEA Plant & Equipment Pty Ltd and 7-Eleven Australia Pty Ltd, on 1 December 2023.

<sup>1</sup> Our modern slavery statement for financial year ending 30 June 2021 and our modern slavery statement for financial year ending 30 June 2022 are available at 7eleven.com.au/modern-slavery-statement.html.



2/658 Church Street, Richmond VIC 3121