### 7-ELEVEN JOINT Modern Slavery Statement





### Contents

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

SECT	ION 3
	MSS Governance and Implementation
SECT	ION 4
	Tracking Progress
SECT	ION 5
	Risk Analysis and Actions - Operations

SECTION 6	<b>21</b>
Risk Analysis and Actions - Supply Chain	21
SECTION 7	<b>26</b>
Outlook	26
Statement of approval	<b>28</b> 28

# Doing what's right in challenging times.

A message from CEO Angus McKay

Welcome to our third Modern Slavery Statement (MSS) covering the year ending 30 June 2022.

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.

Our value 'Do What's Right' can only be lived if we commit to ensuring our operations and supply chains are free of modern slavery risks. This value also guides our policies, practices, standards and governance within our own business and those businesses with which we partner.

As the largest player in the convenience sector, it's not only important for 7-Eleven to be, but also be seen to be, leading 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.

The year ending June 2022 has seen an important maturing in the implementation

- 8

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of our Modern Slavery obligations.

Whilst we already have in place numerous checks and balances as part of our standard contracts and supplier arrangements, preparing our annual MSS gives us an important opportunity to evaluate our progress and improve accountability.

Through what has been another challenging year, a substantial amount has been achieved in delivering on the commitments we outlined in our 2021 MSS and we congratulate everyone involved.

During the last reporting period:

- We delivered Modern Slavery
   Policy compliance training to 302
   supplier partner representatives;
- We designed and delivered a Modern Slavery Training Module which must be undertaken by all head office support staff, and corporate and franchise store team members. The module is also a compulsory training

3

#### 7-ELEVEN HOLDINGS | MODERN SLAVERY STATEMENT 2022

module as part of new employees on boarding process. I'm pleased to report that to date, 98% of support staff have completed the training module, along with 83% of corporate store team members and 85% of franchise store team members;

- Our sustainability strategy comprising four focus areas, one of which is sustainable food systems linking directly with modern slavery elimination, was adopted by our Senior Leadership Team (SLT) and Board. This focus area will cover ethical sourcing of high-risk commodities (such as palm oil, coffee, cocoa and soy) and demonstrates our leadership in the convenience sector;
- We continue to extend our planning horizon for identifying and mitigating risks and proactively developing initiatives to address modern slavery issues via our comprehensive modern slavery work plan;
- We held monthly meetings of our Modern Slavery Committee which oversees our Modern Slavery policies, initiatives, issues and risks. The work of the Committee is a standard agenda item at SLT and Board meetings as part of our business-as-usual considerations;
- We continued to reinforce and promote our policies relevant to mitigating modern slavery risk, including our code of conduct and whistle-blower policies, among team members, suppliers and other relevant stakeholders.

I am proud of the progress we have made in the past year 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 eliminating modern slavery, and the risk of modern slavery, from our operations and supply chains

Angus McKay CEO and Managing Director, 7-Eleven Stores Pty Ltd 9<sup>th</sup> December 2022



#### **SECTION 1**

### About this Modern Slavery Statement

This Modern Slavery Statement (MSS) is made on behalf of, and developed in consultation with, the reporting entities 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) (together, 7-Eleven, 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 2022.

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.

- 2 -

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#### Legal structure

7 Holdings Pty Ltd, the parent company of 7-Eleven, is a privately held company owned by the Withers and Barlow families. 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.

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

The three 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 human rights risks, apply across all three entities and all three share the same, centralised functional support – including procurement and human resources.

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

- 4 ----- 5 ----- 6 ----- 7 -

This MSS provides a single, consolidated description of the actions to address modern slavery across all three reporting entities. This MSS was developed through consultation between all three 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 three 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 work plan, 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, who is the CEO and Managing Director of 7-Eleven Stores Pty Ltd and a director of 7 Holdings Pty Ltd and Convenience Holdings Pty Ltd.

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

#### **SECTION 2**

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### Our Business at a Glance

Our purpose is to make everyday 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.

ce

Dinne

Breakfast

Snacks

Dinner

Lunch

7-FI WE

Breakfast

Snacks

#### 7-ELEVEN HOLDINGS | MODERN SLAVERY STATEMENT 2022

#### Operations



customers served per second.

230M transactions per year (circa).

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COMPANY

31%

value share of Eastern Seaboard convenience market.

11%

volume share of Eastern Seaboard independent petrol retail market.

One

of the largest private companies in Australia.

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

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Section 2: Our Business at a Glance (continued)



# 700+

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

450

family franchise businesses operating about 500 stores.

8,000+

team members

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

#### **Team members**

Our 8,700+ 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 of 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	493	244	339	1,076
PART TIME	31	23	270	324
CASUAL/TEMPORARY	20	2,043	5,324	7,387
TOTAL	544	2,310	5,933	8,787

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\* Figures current as at 30 June 2022





- 6 - 7 -

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# Supply chain and procurement





chain across 7 Holdings Pty Ltd, 7-Eleven Stores Pty Ltd and Convenience Holdings Pty Ltd. For this MSS, any references

are centrally procured by the reporting entities.



Most goods sold are "finished"



Our franchisees can, and do, directly procure and sell 6,000+ 99%

different goods and services are procured annually.

1,700+

suppliers of different goods and services.

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of our procurement is conducted with Australianbased entities.

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7-Eleven entities share a supply chain.

### 12

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.







#### **Tier 1 suppliers**

- More than 1,700 suppliers from whom we procure goods and services.
- Supply finished goods for sale, including
   7-Eleven branded products like Slurpee<sup>™</sup> 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 prefer 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

<b>PROCUREMENT CATEGORIES</b>	PRODUCT AND SERVICES EXAMPLES	<b>PROCUREMENT CATEGORIES</b>	PRODUCT AND SERVICES EXAMPLES
FOOD & HOUSEHOLD GROCERIES	Bakery goods, flavoured 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 and ATM.
ТОВАССО	Cigarettes, cigars, packaged tobacco and smoking accessories.	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	Plastic 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 beans, tea bags, smoothie and Slurpee™ ingredients.	FUEL	LPG, diesel and unleaded petrol.
COMPLEMENTARY PRODUCTS	Sweeteners, sauces, salt, utensils and sugar syrup.	PROPERTY	Property development and leasing.
STORE SUPPLIES	Includes cleaning equipment such as brooms, cleaning wipes, single use gloves and mops.	OTHER	Phones, magazines, maps and directories and newspapers.



#### **SECTION 3**

### MSS Governance and Implementation



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#### 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 7 Holdings Pty Ltd (being the principal governing body of the parent entity of the 7-Eleven group) is responsible for approving this MSS and our Board's Audit, Compliance and Risk Committee, is responsible for monitoring commitment implementation across all the reporting entities.

Our Audit, Compliance and Risk Committee was chaired during the year ending 30 June 2022 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 any 7-Eleven modern slavery risks and ensuring they are dealt with appropriately.

#### 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 2022, 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.

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#### Structure chart

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			7-Eleven	Board			
Michael Smith		Angus McKay		Marina Go		Mark P	owell
Non-Executive Director (Board Chairperson)		Chief Executive Officer & Managing Director		Non-Executiv	e Director	Non-Ex	ecutive Director
Chris Barlow		Sandra Birkens	leigh	Dharmendra	(Dharma) Ch	andra	
Non-Executive [	Director	Non-Executive	Director	Non-Executiv	e Director		
		Audit,	Risk and Co	mpliance Con	nmittee		
Sandra Birkensleigh	Angus M		Michaels		Chris Barlov	A/	Mark Powell
Non-Executive Director Committee Chair)	Chief Exe	ecutive Officer ing Director	Non-Exec	cutive Director nairperson)			Non-Executive Directo
Angus McKay	Julie La		ior Leadersl Daniel W	hip Team (SLT)	Matt Ke	oah	James Wyatt
Chief Executive Office & Managing Director	r General	Manager er & Insights		ancial Officer		Manager	General Counsel
<b>Braeden Lord (to May 2022)</b> General Manager Channel	Fiona H (from M June 20 General Channe	<b>ay –</b> 022) Manager		Beaumont Manager & Safety	General	<b>n Eyears</b> Manager / & Technology	y
		Modern Sla	very Comm	ittee Represe	ntation		
Paul Sirant		Christian Bu	rns	David Gort	on	Adam Lovie	9
Chapter Mei Sustainabilit (Chairpersor	/	Area Lead Procuremen	t	Area Lead Risk & Com	pliance	Chapter Lea Merchandis	
Rowan Lee		Hannah Mor	not	Nicole Floy	d	Robert Swit	ajewski
Team Lead Stakeholder Managemer		Chapter Lead Performance		Chapter Lea Corporate S		Chapter Me Legal	mber

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#### 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 team members during the next reporting period via on-boarding and compliance training online. We have also made the training available to small-to-medium suppliers in high-risk categories during the year ending 30 June 2022.

#### **Policy objectives**

Our objectives are clearly set out within the Policy and to meet them we require all people 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.
- Avoid any activity that might lead to, or suggest, a breach of the Policy.
- Proactively identify, assess, mitigate and remediate modern slavery risks and impacts in 7-Eleven's operations and supply chains.
- Adopt appropriate due diligence on suppliers coupled with, where appropriate, requirements that they implement relevant procedures that comply with this Policy.

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

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Section 3: MSS Governance and Implementation (continued)

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

- Do not engage in any form of modern slavery.
- Adhere to all applicable domestic laws.
- 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 domestic laws.

#### Modern slavery work plan

Our modern slavery work plan is organisation-wide and ensures we identify clear and effective steps towards achieving our current and future MSS commitments. The work plan allocates clear ownership of commitments, provides transparent measurement, time frames and defines key results. Progress against the work plan is reported quarterly to the SLT, however the work plan is a "living" document and is discussed within our business on an as required basis.

The work plan is regularly updated to ensure it remains fit for purpose, and has been updated during this Statement period.

#### Sustainability function and strategy

Modern slavery risks are intertwined with other global environmental, social and governance risks. As 7-Eleven continues to develop its broader approach to sustainability, its modern slavery actions will be integrated within its sustainability strategy to avoid duplication and take advantage of synergies.

We have a sustainability squad who engage the business on modern slavery, responsible sourcing and other sustainability initiatives and commitments as laid out in our Sustainability Strategy, which was finalised in the year ending 30 June 2022. The strategy sets out our commitment to sustainable practices, with four focus areas: climate action, supporting local communities, sustainable 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 whistle-blower 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) as well as any breaches of our code of conduct or the Policy. Matters raised through this channel are taken extremely seriously by the Board and SLT. Complaints are investigated and, where necessary, steps taken to resolve the complaint.

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# 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. This includes significant updates to our modern slavery work plan.

#### 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.

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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 2022

#### COMMITMENTS 2020/21 MSS

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#### PROGRESS IN 2021/22 PERIOD

1	Develop and make available training on 7-Eleven's modern slavery policy and objectives for our small-to-medium suppliers in high-risk categories.	Supplier event run by 7-Eleven targeted to small and medium suppliers. 302 supplier partners joined the online session.
2	Provide modern slavery training to store managers and team members (corporate and franchisee).	A comprehensive training module was successfully launched through the 7-Eleven human resources portal. Team member completion rate was 73% as of June 2022.
3	Revise on-boarding processes for new team members to reinforce our modern slavery policy and objectives.	Training modules incorporated into mandatory on boarding tasks for all new starters.
4	Develop tools to evaluate our suppliers' alignment with our own commitment or approach to modern slavery.	Sedex (Supplier Ethical Data Exchange) was adopted as the preferred platform to engage and coordinate supplier information and risk data. Initial key suppliers have been engaged and on boarded.
5	Refresh supplier risk assessment.	A risk assessment was completed covering the period Jul 1, 2020 to June 30, 2021.
6	Determine strategic focal area actions for our Modern Slavery strategy, aligned to the enterprise sustainability strategy.	Strategy focal areas work shopped. Horizon plan updated to highlight alignment with sustainability strategy.
7	Review and refine our organisation-wide Modern Slavery work plan for the period ending 30 June 2022.	Work plan is up to date and focus areas developed for FY22.

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#### **SECTION 5**

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



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# Risk identification and assessment

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

During the year ended 30 June 2022 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	Some 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**

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.

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 employment law and modern slavery risks. We are committed to continually improving in this area, with a view to demonstrating industry leadership.



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

- 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 hot line 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 whistle-blower 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 an Employee Relations Governance Management Committee and by the Board's Audit and Compliance Committee.
- Casual Employment Information Statement to all new casual team members providing these employees with information about their conditions of employment and their rights.

# Progress summary

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

- ✓ Supplier engagement and training event run by 7-Eleven targeted to small and medium sized suppliers.
- ✓ Staff training module successfully launched through the 7-Eleven human resources portal.
- Staff training modules incorporated into mandatory on boarding tasks for all new starters, and being completed as part of induction procedures.
- ✓ Sedex has been adopted as the preferred platform to engage with supplier information and risk assessment. An initial group of key suppliers have been engaged and on boarded.
- ✓ Operations and supply chain risk assessment completed covering FY21.
- ✓ Modern slavery strategy focal areas have been determined based on stakeholder engagement, and horizon plan has been updated to highlight alignment with sustainability strategy.

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✓ Work plan is up to date and focus areas developed for FY22.

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#### **SECTION 6**

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

#### **Risk identification and assessment**

With more than 1,700 Tier 1 suppliers providing us with more than 6,000 goods and services, our supplier risk assessments apply across the three reporting entities, are heavily focused on procurement systems and processes and are centralised and conducted at the support office level. These 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. 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 our product category assessment to ensure our immediate focus is on the highest risk areas where our relationship to the risks are closest.

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



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#### Table 5: Supply chain risks of modern slavery

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	Include 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.

- 8

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As previously noted in this MSS, 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 2022, we continued to develop our supply chain risk assessment and due diligence processes, considering changes in our supplier base, the industry and specific country risks to develop an overall assessment of each supplier's inherent risk. Moving forward, we are 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. In 2021 we undertook a comprehensive survey of 23 key suppliers, which continues to inform our risk assessment in FY2022.

7-Eleven performs a yearly 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 summarizes inherent risks of modern slavery in the operations and supply chains of a business entity – linked to their location and industry specific risk, which includes pulling data from databases such as International Labour Organisation (ILO) and media scans for known controversies.

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

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

HIGH RISK CATEGORY	RATIONALE	HIGH RISK CATEGORY	RATIONALE
	SMOKING/TOBACCO		SAFETY & SECURITY
	Third-party proprietary branded products		Services
	<ul> <li>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.</li> </ul>		<ul> <li>Higher risks driven through prevalence of sub-contracting, use of labour hire companies and migrant workers.</li> <li>Moderate category spend (up to AUD\$100 million.</li> </ul>
$\bigcirc$	<ul> <li>Significant category spend (greater than AUD\$100 million).</li> </ul>		SANITATION & EXTERNAL SERVICES
	COFFEE 7-Eleven branded products		Services — Higher risks driven through prevalence of sub-contracting,
	<ul> <li>Higher risks of forced labour and child labour driven largely by locations of coffee production.</li> <li>Moderate category spend (up to AUD\$100 million).</li> </ul>		<ul><li>use of labour hire companies and migrant workers.</li><li>Moderate category spend (up to AUD\$100 million).</li></ul>
	FOOD-ON-THE-GO		CONSTRUCTION PROJECTS FACILITIES MANAGEMENT
	<ul> <li>7-Eleven branded products</li> <li>Higher risks in both the agricultural production and the distribution phases, in particular exploitation of migrant workers.</li> <li>Moderate category spend (up to AUD\$100 million)</li> </ul>		<ul> <li>WAREHOUSING</li> <li>Services</li> <li>High inherent risks of forced labour within these industries in particular due to the frequency of sub-</li> </ul>
$\frown$	BAKERY 7-Eleven branded products		<ul><li>contracting and opaque hiring practices.</li><li>Moderate category spend (up to AUD\$100 million).</li></ul>
	<ul> <li>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.</li> </ul>		CLOTHING & STORE UNIFORMS 7-Eleven branded products — The risk of all types of modern slavery is inherently high
	CONFECTIONARY 7-Eleven branded products		in the clothing and apparel industry – there are several known issues within textile supply chains, including child labour, forced labour and debt bondage.
	<ul> <li>Higher risk of child labour (particularly in cocoa production), forced labour and debt bondage</li> </ul>		

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- Moderate category spend (up to AUD\$100 million).

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- (particularly in sugar production and supply).

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Based on our engagement with, and feedback from suppliers, we have identified our small-tomedium 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

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.



# Progress

#### To date, and including the reporting period ending 30 June 2022, we have identified no instances of modern slavery in our supply chain.

During the period, we continued our work with suppliers to bring the risks of modern slavery to their attention, formally via Policy, training and contractual obligations and informally via our everyday conversations and interactions.

302 supplier representatives attended the Modern Slavery focus event run by 7-Eleven targeted to small and medium suppliers.

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



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### SECTION 7 Outlook



The table below outlines our commitments for the reporting period ahead, ending 30 June 2023.

#### Table 7: Summary of FY23 commitments

#### COMMITMENTS FOR THE YEAR ENDING 30 JUNE 2023

- 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 Review existing supplier contracts to ensure that contract terms set adequately clear expectations around identifying and addressing all forms of modern slavery across our operations and supply chains.
- 4 Conduct Sedex audit assessment with key suppliers in higher risk commodity categories.
- 5 Review the effectiveness of modern slavery instance management and remediation processes outlined through a simulation assessment to test end to end event resolution.
- 6 Refresh our supplier risk assessment.



We are clear on our commitment to contributing to the elimination of modern slavery globally and 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





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# Statement of approval



This Statement was approved by the 7 HOLDINGS PTY LTD (ABN 31 005 620 851) Board, the principal governing body for 7 Holdings Pty Ltd, on its own behalf and on behalf of its wholly-owned subsidiaries CONVENIENCE HOLDINGS PTY LTD (ABN 71143 746 356) and 7-ELEVEN STORES PTY LTD (ABN 48 005 299 427).

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Angus McKay, CEO and Managing Director of 7-Eleven Stores Pty Ltd and director of 7 Holdings Pty Ltd and Convenience Holdings Pty Ltd, on 9<sup>th</sup> December 2022.



2/658 Church Street, Richmond VIC 3121