

# 7-ELEVEN JOINT Modern Slavery Statement



Breakfast

Lunch

Dinner

Snacks

Breakfast

Lunch

Dinner

Snacks

Breakfast





## Acknowledgment of Country

7-Eleven acknowledges all Aboriginal and Torres Strait Islander Traditional Custodians of Country and recognises 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.



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# Introduction from our CEO Fiona Hayes.

I am pleased to endorse our Modern Slavery Statement covering the period 1 July 2023 to 31 December 2024.

At 7-Eleven, we live by our four values of Reach Higher, Do What's Right, Delight Customers and Thrive Together.

Our value, 'Do What's Right' comes to life through our commitment to identify and address Modern Slavery 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.

As the largest player by market share 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.

Despite that 99% of our annual procurement spend is conducted with Australian-based entities operating under Australian laws, we must still be alert to any risks in our supply chains.

From the Board and Senior Leadership Team through to our Team Members, our business is committed to addressing the risk of Modern Slavery in our operations and supply chains.

I am pleased with the progress we have made across this reporting period, in particular the work to embed our Modern Slavery policies, practices and procedures across our business.

By reading this Statement, I hope you gain a better understanding of our business, our progress and our future commitments to combat Modern Slavery.

**Fiona Hayes**  
CEO and Managing Director,  
7-Eleven Stores Pty Ltd  
11/06/2025



**During this reporting period, 7-Eleven;**

- Continued to improve our Modern Slavery risk assessment processes in line with best practice with the development of our Modern Slavery risk management framework. The framework sets out our expectations of suppliers of 7-Eleven Branded Product and 7-Eleven Contracted Services for compliance with Modern Slavery legislation and reporting of any potential Modern Slavery issues.
- Continued to assess risk in our supply chain by gaining an insight into high-risk category supplier data through use of the Sedex risk assessment platform by implementing supplier self-assessment questionnaire and the Sedex

Members Ethical Trade Audit (SMETA) audits for our High-Risk Suppliers. 7-Eleven also hosted its first Sedex Member Forum involving key players in the food and beverage industry. Sedex is a credible risk assessment tool that identifies and assesses environmental and social risks in supply chains.

- Delivered Modern Slavery training to our Team Members with 100% of support office team members and 98% corporate and franchise store team members successfully completing the training module.
- Engaged our Suppliers on our Modern Slavery objectives through our tailored online training module for Suppliers, reinforcing our Modern Slavery Policy, our Code of Conduct and Whistleblower policies.

- Reviewed our supplier standard trading terms to include robust Modern Slavery obligations on suppliers across their operations and supply chains. Refreshed our review of High-Risk Supplier arrangements to identify agreements lacking adequate Modern Slavery contractual obligations and put in place plans for engagement with those suppliers to enter into contracts or to renegotiate contracts to include appropriate Modern Slavery provisions.





## SECTION 1

# About this Modern Slavery Statement

This joint Modern Slavery Statement (the Statement) has been prepared in accordance with the Modern Slavery Act 2018 (the Act). This Statement is made on behalf of Convenience Group Holdings Pty Ltd ACN 662 201 274 (CGH) operating under its ultimate Australian parent company AR HoldCo Pty Ltd ACN 673 156 593 and its wholly owned or controlled subsidiaries and is developed in consultation with the relevant reporting entities set out in Table 1.

This Statement sets out the actions we have taken to identify, assess, and address Modern Slavery risks across our operations and supply chain for the reporting period 1 July 2023 to 31 December 2024. Our current reporting period was extended to 18 months as a consequence of a change in the group financial year from 30 June to 31 December. All data presented in this Statement is also for the same reporting period.

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

Table 1: Reporting Entities

REPORTING ENTITY	DESCRIPTION
AR HOLDCO PTY LTD ACN 673 156 593	AR Hold Co Pty Ltd is the Australian ultimate holding company. It was incorporated on 23 November 2023 and is owned by a foreign entity, 7-Eleven International LLC, which does not carry on business in Australia.
AR BIDCO PTY LTD ACN 673 156 851	AR BidCo Pty Ltd is a wholly owned subsidiary of AR HoldCo Pty Ltd and the parent company of Convenience Group Holdings Pty Ltd. It was incorporated on 23 November 2023 and is an intermediate holding company.
CONVENIENCE GROUP HOLDINGS PTY LTD ACN 662 201 274	Convenience Group Holdings Pty Ltd is the holding company of 7 Holdings Pty Ltd and SEA Plant & Equipment Pty Ltd.
7 HOLDINGS PTY LTD ACN 005 620 851	7 Holdings Pty Ltd is a wholly owned subsidiary of Convenience Group Holdings Pty Ltd and the parent company of 7-Eleven Stores Pty Ltd.
7-ELEVEN STORES PTY LTD ACN 005 299 427	7-Eleven Stores Pty Ltd is a wholly owned subsidiary of 7 Holdings Pty Ltd. The company has a licence to operate and franchise 7-Eleven stores in Australia from US based 7-Eleven International LLC.
CONVENIENCE HOLDINGS PTY LTD ACN 143 746 356	Convenience Holdings Pty Ltd is a wholly owned subsidiary of 7 Holdings Pty Ltd with responsibility for 7-Eleven's corporate operated stores.
SEA PLANT & EQUIPMENT PTY LTD ACN 601 889 614	SEA Plant & Equipment Pty Ltd is a wholly owned subsidiary of Convenience Group Holdings Pty Ltd. The company owns certain store and petrol equipment used in the 7-Eleven business.
7-ELEVEN AUSTRALIA PTY LTD ACN 637 676 558	7-Eleven Australia Pty Ltd is a wholly owned subsidiary of SEA Plant & Equipment Pty Ltd. The company 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 and corporate owned stores.





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

The board of CGH is ultimately accountable for managing risk including Modern Slavery, whilst the Senior Leadership Team, the Executive Risk Committee and the Modern Slavery Committee are accountable for overseeing risk management. The group operates as a consolidated entity for the purpose of its operations and shares common values and commitments to responsible business practice, including the commitment to eliminate Modern Slavery. Our existing policies, including those which relate to identifying and managing Modern Slavery and human rights risks, apply across the group and the group 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 reporting entities and ensures a shared approach to rolling out the various commitments, processes and policies outlined in this Statement.

This Statement provides a single, consolidated description of the actions to address Modern Slavery across the reporting entities. This Statement was developed through consultation between the reporting entities and has been approved by the respective Boards of each reporting entity.

### Internal consultation

We are committed to developing and maintaining a robust group-wide response to Modern Slavery. In preparing this Statement, 7-Eleven consulted with our directors and management across the reporting entities through our Modern Slavery Committee (the MS Committee). The MS Committee is responsible for managing the group's Modern Slavery Policy (the MS Policy) implementation. Its role is to evaluate risks, recommend action and embed Modern Slavery due diligence practices throughout the group. In this reporting period, consultation through the MS 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 MS Policy and commitments, and a review of the text of this Statement. Further detail on the MS Committee's function is set out in Section 3 of this Statement.

This Statement is endorsed by the Chief Executive Officer and our executive and group boards. This Statement is signed by Shinji Abe, the Executive Chairman and director of Convenience Group Holdings Pty Ltd and a director of AR HoldCo Pty Ltd, AR BidCo Pty Ltd, 7 Holdings Pty Ltd, 7-Eleven Stores Pty Ltd, Convenience 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.





SECTION 2

# Our Business at a Glance

Our purpose is to Make Every Day Easier So  
Australians Can Live A Good Life.

We continually strive to deliver a wonderful  
customer experience by living our ambition of My  
Convenient Neighbourhood Store, 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.



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## Operations



### CUSTOMERS

**8**

customers served  
per second.

**250M**

circa 250 million  
transactions per year.



### COMPANY

**33%**

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 petrol  
and convenience  
companies in Australia.



### STORES & PEOPLE

**745+**

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

**450+**

family franchise businesses  
operating about 500 stores.

**9,000+**

team members.

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





Team members

Our 9,000+ team members across all reporting entities consist of corporate office, corporate store and franchisee store employees. 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 2: Composition of 7-Eleven team

WORK TYPE*	SUPPORT OFFICES	CORPORATE STORES	FRANCHISE STORES	TOTAL
FULL TIME	546	440	279	1,265
PART TIME	49	19	151	219
CASUAL/TEMPORARY	28	2,924	4,615	7,567
TOTAL	623	3,383	5,045	9,051

\*Figures current as at 31 December 2024.

Section 2: Our Business at a Glance (continued)





# Supply chain and procurement



We operate a shared supply chain across the group. For this Statement, any references to supply chain describes the business relationship between the reporting entities and our suppliers.



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



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



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

## 6,000+

different goods and services are procured annually.

## 99%

of our procurement is conducted with Australian-based entities.

## 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.

## 2,000+

suppliers of different goods and services.



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### Tier 1 suppliers

- Supply finished goods for sale, including 7-Eleven branded products like Slurpee® and products sold under other well-known brands.
- Include more than 2,000 suppliers from whom we procure goods and services.
- Provide consumable items not for sale, like utensils used in stores, and services, such as facilities management.
- Includes aggregators, manufacturers, and direct service providers.
- We aim to engage in long-term partnerships with suppliers who meet our quality and supply standards.



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

PROCUREMENT CATEGORIES	PRODUCT AND SERVICES EXAMPLES
FOOD & HOUSEHOLD GROCERIES	Baked goods, milk, soft drinks, chocolate bars, loose confectionery, juices, chewing gum and health snacks.
TOBACCO	Cigarettes, cigars, packaged tobacco and smoking accessories (excluding vaping products).
ASSETS CONSTRUCTION AND ENVIRONMENT	Trades and general maintenance including coffee machine and petrol pump maintenance, as well as safety, security and sanitation.
CORPORATE SERVICES	Mail and cargo, paper and printing, services and training services.
MARKETING	Advertising and marketing, including creative services and point of sale materials.
BEVERAGE	Coffee, tea bags, shakes and Slurpee™ ingredients.
COMPLEMENTARY PRODUCTS	Cups, lids, straws, sweeteners, sauces, salt, utensils and sugar syrup.
STORE SUPPLIES	Includes cleaning equipment such as brooms, wipes, single use gloves and mops.

PROCUREMENT CATEGORIES	PRODUCT AND SERVICES EXAMPLES
FINANCIAL PRODUCTS & SERVICES	Transport tickets, vouchers, 7-Eleven gift cards and ATM.
INFORMATION TECHNOLOGY	App development, risk management software, infrastructure support and hardware.
PACKAGING	Paper bags, coffee cups, Slurpee® cups, donut trays and coffee trays
LOGISTICS & SUPPLY CHAIN	Warehousing services and transport of goods to stores.
PROFESSIONAL SERVICES	Advisory and legal services.
FUEL	LPG, diesel, unleaded petrol and E10.
PROPERTY	Property development and leasing.
OTHER	Phones, magazines, maps, directories and newspapers.



## SECTION 3

# Modern Slavery Governance and Implementation

## Governance

As a leader in petrol 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 CGH board is ultimately accountable for managing risk including Modern Slavery while the SLT is accountable for overseeing risk management.

### Board

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 (and its wholly owned subsidiaries 7-Eleven Stores Pty Ltd and Convenience Holdings Pty Ltd) and SEA Plant & Equipment Pty Ltd (and its wholly owned subsidiary 7-Eleven Australia Pty Ltd) is responsible for approving this Statement, and our joint Boards' Audit, Compliance and Risk Committee (ACRC) was responsible for monitoring commitment implementation across all the reporting entities until end of March 2024. The ACRC met quarterly. It included Non-Executive Directors, the CEO and the Managing Director.

The Executive Risk Committee was formed in April 2024. It is now responsible for monitoring commitment implementation across all the reporting entities.

### Senior Leadership Team

Our Senior Leadership Team (SLT) is led by our CEO and includes the Chief Financial & Tech Officer, Chief Legal Counsel and senior representatives from the relevant business areas including Customer, Product, Technology and Strategy and People tribes. The SLT selects the senior representative from the relevant business areas to form the members of the MS Committee and is accountable for managing and addressing any 7-Eleven Modern Slavery risks and incidents.

The Executive Risk Committee is comprised of the Executive Chairman, the SLT and a representative from the Strategy tribe. It replaced the ACRC's role in April 2024. The committee meets quarterly and oversees the identification and management of emerging Modern Slavery risks and ensures that any remediation plans, and corrective actions are implemented in a timely manner.

The SLT is responsible for managing and addressing any 7-Eleven Modern Slavery risks and incidents and together with the Executive Risk Committee report any risks identified to the CEO for escalation to the CGH Board as required.

### Modern Slavery Committee

Our MS Committee has the responsibility of assessing the effectiveness of the measures put in place including risk review of suppliers. The MS Committee meets monthly. The MS Committee leads and monitors the implementation of all Statement commitments, and its remit covers all the reporting entities. For the reporting period 1 July 2023 to 31 December 2024, the MS Committee was chaired by the 7-Eleven Sustainability Manager. MS Committee members include senior representatives from Procurement, Customer, Product, People, Public Affairs, Legal, Risk and Channel.

Identified issues are dealt with by the MS Committee and raised with the SLT where escalation is required. Modern Slavery risks, mitigation and management strategies are presented to our SLT by the MS Committee as part of quarterly updates, and to the Board annually for discussion and endorsement.

Our Team Members are trained in Modern Slavery detection, and we have processes in place for whistleblowing and handling of grievances.





The group has in place a range of policies and processes which are relevant to the prevention of Modern Slavery and compliance with the Act. These include:

### Modern Slavery Policy

Our MS Policy applies to all 7-Eleven franchisees, Suppliers, officers, directors and Team Members. It helps us understand the risks of Modern Slavery across our operations and supply chain and ensures that we develop a shared understanding of our Modern Slavery expectations. Our MS Policy is reviewed and updated every three years or when there is a change in legislation.

In this reporting period, to cultivate a thorough understanding of the risks of Modern Slavery in our operations and supply chains, we delivered MS Policy online training as part of our annual compliance training and refresher programs to all Team Members across the business.

### Modern Slavery Policy objectives

Our objectives are clearly set out within the MS 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 MS Policy.
2. Comply with all relevant Modern Slavery laws and regulations, including the Act.
3. Avoid any activity that may potentially breach the MS 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 MS Policy.
6. Conduct and complete training so that individuals can recognise Modern Slavery risks and take steps to mitigate such risk.
7. Communicate the MS Policy and relevant legislation and documents to all relevant parties including Team Members, business partners and Suppliers.

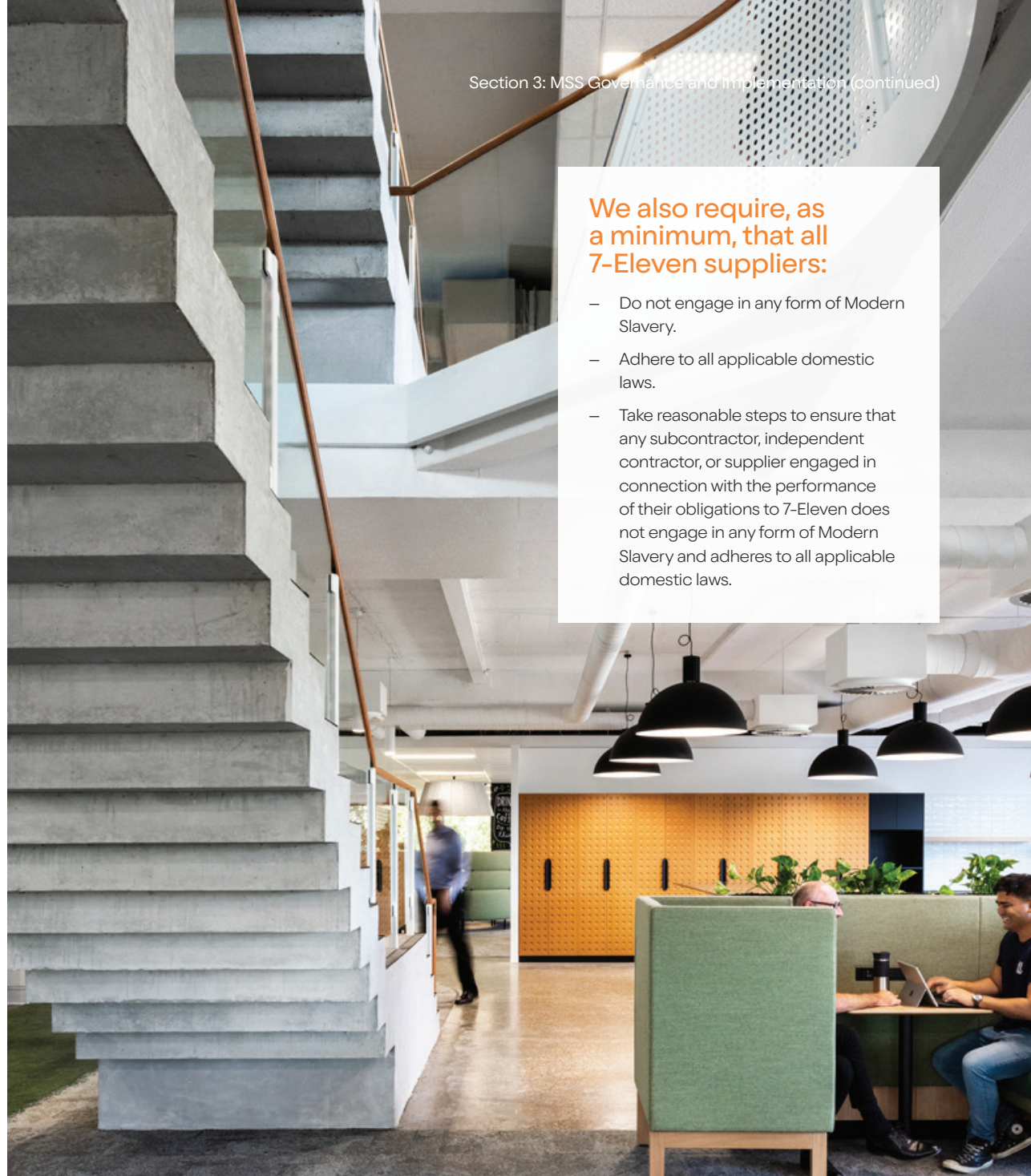
### Sustainability function and strategy

7-Eleven's sustainability strategy sets out our commitment to sustainable convenience, with four focus areas: climate action, supporting local communities, sustainable food systems and human health.

The strategy is centrally governed through the Sustainability Chapter with commitments owned across the enterprise, including key stakeholders from Customer, Product, Finance, People and Channel 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.

### 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.





### Other relevant policies and strategies

Our internal policies protect the working rights of our Team Members. We are committed to providing equal opportunity, safe working conditions and fair work practices.

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

Our monitoring and remediation processes include a Whistleblower Policy and a mechanism which provides a channel for all franchisees, Team Members, family members and former Team Members, consultants, contractors and Suppliers to confidentially raise concerns without fear of reprisal. Concerns may include misconduct, unethical or illegal activity (including Modern Slavery in our operations and supply chains) as well as any breaches of our MS Policy, Code of Conduct or the Whistleblower Policy. Matters raised through this channel are taken extremely seriously by the Board and the senior leadership team. Complaints are investigated and, where necessary, appropriate steps taken to resolve and/or remediate the issue.

A key focus for this reporting period was the development of the Modern Slavery Risk Management Framework.

### Modern Slavery risk management framework

We developed our Modern Slavery Risk Management Framework (the Framework) – a comprehensive document that sets out risk thresholds, responsibilities and remediation steps.

The Framework provides guidance on how Team Members and Suppliers can identify Modern Slavery risks and their responsibilities for managing and mitigating Modern Slavery incidents.

The Framework allocates clear ownership of responsibilities for internal governance, risk assessment, risk management and monitoring of appropriate remediation. In assessing risks of Suppliers, we have adopted a risk-based methodology under the Framework, which includes:

- The scale of spend with Suppliers;
- The nature of the products and services delivered; and
- The Supplier's domicile noting that those with businesses registered in countries with a strong Modern Slavery legislative framework represent a lower risk.

In particular, the Framework covers:

- High-Risk Supplier risk assessments and audit processes;
- Record keeping and reporting of actual and suspected incidents;
- Remediation processes and actions; and
- Consequences of non-compliance.





## SECTION 4

# Tracking Progress







Across our business, we continue to develop a systematic approach to measuring the effectiveness of our systems and processes in detecting, mitigating and managing Modern Slavery risks in our operations and supply chain so that we can be more effective in detecting and mitigating Modern Slavery.

We continue to measure and track our effectiveness across the reporting entities using the following framework.



The table below sets out our progress against the commitments made under our 2023 Modern Slavery Statement.

Table 4: Progress on commitments for this reporting period

COMMITMENTS 2023 MSS		PROGRESS STATEMENT
1	Continue engagement with our small-to-medium Suppliers through provision of training on our MS Policy and objectives.	 <p>We actively communicate our expectations to our Suppliers in respect to Modern Slavery risks. We developed bespoke training available to all of our suppliers. This online training is accessible to each supplier at no cost via our website. For High Risk Suppliers we continued our progress with Sedex onboarding to assess risks of Modern Slavery.</p>
2	Continue delivering Modern Slavery training to Team Members	 <p>We delivered Modern Slavery training to our Team Members through our human resources portal. As at 31 December 2024:</p> <ul style="list-style-type: none"> <li>— 100% of support office team members</li> <li>— 98% of corporate store team members</li> <li>— 98% of franchise store team members</li> </ul> <p>successfully completed the training module.</p>
3	Engage with High-Risk Suppliers to address contracts that do not currently include Modern Slavery obligations for suppliers in respect of their operations and supply chains.	 <p>We enforce our standards through our contracts by engaging with High-Risk Suppliers to address contract gaps and undertaking an additional review of those supplier contracts. We also reviewed our standard trading terms to include robust Modern Slavery obligations on Suppliers.</p>
4	Continue to map and assess Modern Slavery risk of sites of our High-Risk Suppliers.	 <p>We identified and onboarded additional High-Risk Suppliers and their sites to the Sedex risk assessment platform. As at 31 December 2024, thirty-eight (38) High Risk Supplier sites were mapped. As part of the risk assessment High-Risk Suppliers are provided with guidance on any action required by the relevant senior representative.</p>
5	Complete our annual supplier Modern Slavery Inherent Risk assessment, to any identify High-Risk Suppliers.	 <p>We employed an additional risk assessment tool (Radar) to undertake Inherent Risk assessments of the majority of our suppliers to identify High Risk Suppliers.</p> <p>Any Supplier identified as a High-Risk Supplier is requested to undergo a Residual Risk assessment via Sedex. We expect High-Risk Suppliers to comply with our request to onboard to Sedex and complete the self-assessment questionnaire. We regularly monitor onboarding and risk assessment results and escalate any non-compliance to the SLT, as required.</p>
6	Develop a modern slavery supply risk monitoring and management framework.	 <p>We developed our Modern Slavery Risk Management Framework, a key document for communicating expectations to our Suppliers. The Framework also allocates clear ownership of responsibilities for internal governance, risk assessment, risk management and remediation monitoring.</p>





SECTION 5

# Risk Analysis and Actions – Operations



## 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 reporting period we found no instances of Modern Slavery in our operations.**

Table 5 sets out the exposure and Residual Risk of causing, contributing to or being directly linked to Modern Slavery risks within our operations.

Table 5: 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.

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.

Key actions we have taken across the reporting period entities' operations during this reporting period which relate to our Statement include delivering Modern Slavery training through the 7-Eleven human resources portal.



## 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 non-compliance are readily identified and rectified.
- Biometric time and attendance records for all store 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 occurrences or patterns of behavior as part of our general due diligence processes.
- Substantial levels of field-level monitoring and 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 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 Executive Risk Committee.
- Casual Employment Information Statement to all new casual Team Members providing these employees with information about their conditions of employment and their rights.
- Provision of the Fixed Term Contract Information Statement to all Team Members engaged pursuant to a new fixed term or maximum term contract.



SECTION 6

# 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 all reporting entities and are heavily focused on procurement systems and processes that are centralised and conducted at the support office level.

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 supplier 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 initially helps guide our product category assessment to ensure our immediate focus is on the highest risk categories (refer to Table 7) where our relationship to the risks are closest.

Table 6: 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.



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, including providing training to our franchisees.

During the year ending 31 December 2024, 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 MS Policy and objectives to our Suppliers.

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.

Senior representatives from the relevant business areas conduct risk assessment of our suppliers and service providers to determine Inherent Risk across their operations. We undertake an Inherent Risk assessment on an annual basis covering suppliers of a majority of products and services supplied in our corporate stores and franchisee operations other than the products and services sourced by the franchisees independently of the support office. Beyond this we do not conduct any further Modern Slavery risk assessment on suppliers generally including suppliers of third-party proprietary products as we have limited influence over these suppliers and rely on them to comply with Modern Slavery laws.

For High-Risk Suppliers we use the Sedex risk assessment tool to evaluate site specific risks by implementing the supplier self-assessment questionnaire and the Sedex Members Ethical Trade Audit audits. As noted above all other suppliers including suppliers of third-party proprietary products are excluded from this assessment.

The annual risk 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.

In our 2023 Statement we reported Inherent Risk across eleven (11) supply chain risk categories. During this reporting period the Inherent Risk assessment includes twelve (12) risk categories, and updated specific category labels, as detailed in Table 7. The risk categorisation is based on industry, product type and the level of influence we have on the supply chain, as measured by spend.





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

**Table 7: Category high risk focus areas**

CATEGORY	RATIONALE	CATEGORY	RATIONALE
SMOKING/TOBACCO	<p>Third-party proprietary branded products</p> <ul style="list-style-type: none"> <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> <li>Significant category spend (greater than AUD\$100 million).</li> <li>We recognise this category of suppliers as high-risk however we have limited influence on the supply chain and rely on these suppliers to comply with Modern Slavery laws.</li> </ul>	BAKERY	<p>7-Eleven branded products</p> <ul style="list-style-type: none"> <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> <li>Moderate category spend (up to AUD\$100 million).</li> </ul>
FUEL	<p>Third-party proprietary branded products</p> <ul style="list-style-type: none"> <li>Higher risks of forced labour, with some supplier sites in high-risk geographies with inherent hazardous working conditions.</li> <li>Significant category spend (greater than AUD\$100 million).</li> <li>We recognise this category of suppliers as high-risk however we have limited influence on the supply chain and rely on these suppliers to comply with Modern Slavery laws.</li> </ul>	CONFECTIONERY AND SNACKS*	<p>7-Eleven branded products</p> <ul style="list-style-type: none"> <li>Higher risk of child labour (particularly in cocoa production), forced labour and debt bondage (particularly in sugar production and supply).</li> <li>Moderate category spend (up to AUD\$100 million).</li> </ul>
BEVERAGES AND DRINKS*	<p>7-Eleven Branded Products</p> <ul style="list-style-type: none"> <li>Higher risks of forced labour and child labour driven largely by locations of agricultural production.</li> <li>Significant category spend (up to AUD\$100 million).</li> </ul>	SAFETY AND SECURITY	<p>7-Eleven Contracted Services</p> <ul style="list-style-type: none"> <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>
FOOD-ON-THE-GO	<p>7-Eleven branded products</p> <ul style="list-style-type: none"> <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>	SANITATION AND EXTERNAL SERVICES	<ul style="list-style-type: none"> <li>7-Eleven Contracted Services</li> <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>



Table 7: Category high risk focus area – continued

CATEGORY	RATIONALE
CONSTRUCTION PROJECTS	7-Eleven Contracted Services
FACILITIES MANAGEMENT	<ul style="list-style-type: none"><li>— High inherent risks of forced labour within these industries in particular due to the frequency of sub-contracting and opaque hiring practices.</li><li>— Moderate category spend (up to AUD\$100 million).</li></ul>
WAREHOUSING	
CLOTHING AND STORE UNIFORMS	7-Eleven Branded Products <ul style="list-style-type: none"><li>— 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.</li><li>— Smaller category spend (up to AUD\$10 million)</li></ul>

We also continue our engagement with Suppliers, who do not qualify as a High-Risk Supplier.

These Suppliers may be less advanced in assessing and reporting 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.

We developed bespoke Modern Slavery training available to all our suppliers at no cost via our website and promote training as part of our supplier communications.

\* Note the categories: Beverages and drinks, and Confectionery and snacks are updated category labels, previously reported in our 2023 MSS as Coffee and Confectionery, respectively.





## Risk management and mitigation - Supply Chain

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

- Rigorous and mandatory internal 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.
- Sedex risk assessment tools and supplier self-assessment questionnaire for our High-Risk Suppliers.
- SMETA audits and other additional audits or other forms of independent verification for High-Risk Suppliers.
- Training and awareness.

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 MS Policy and the Framework 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 continue to focus on selecting and consistently applying the right controls across our Suppliers and those suppliers most strongly associated with the 7-Eleven brand as this is where we have the greatest influence. We can then progressively expand these controls across a wider selection of our suppliers.





# Progress – Supply Chain

To date, and including the reporting period ending 31 December 2024, we have identified no instances of Modern Slavery in our supply chain.

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

- ✓ We put in place engagement plans for High-Risk Suppliers to address contractual Modern Slavery provision gaps and undertook an additional review of High-Risk Supplier contracts through to 31 December 2024.
- ✓ We onboarded additional High-Risk Suppliers and their sites to Sedex. As at 31 December 2024, thirty-eight (38) High-Risk Supplier sites have been mapped.
- ✓ We employed an additional risk assessment tool (Radar) to undertake Inherent Risk assessments of our suppliers and to standardise collection of Modern Slavery risk information via Sedex.
- ✓ We developed our Modern Slavery Risk Management Framework – details of which are contained in section 3.





## Collaboration and partnerships

In addition to working closely with our Suppliers, we seek opportunities to collaborate with other key stakeholders to implement our Modern Slavery objectives. Table 8 summarises our key engagements and partnerships.

**Table 8: Collaboration during the reporting period**

ENGAGEMENT STAKEHOLDER	SUMMARY
SEDEX	<p>Sedex is one of the world's leading ethical trade membership organisations, working with businesses to improve working conditions in global supply chains.</p> <p>We continue our use of Sedex as the preferred platform to engage and coordinate supplier information and risk data and continue to engage and onboard High-Risk Suppliers.</p> <p>During the reporting period 7-Eleven hosted its first Sedex Member Forum involving key players in the food and beverage industry.</p>
AUSTRALIAN RETAILERS ASSOCIATION (ARA)	<p>The ARA is Australia's peak retail body, representing more than 120,000 retail shop fronts and online stores. The ARA informs, advocates, educates, protects and unifies independent, national and international retail community.</p> <p>We continue to be members of the ARA and are part of the ARA sustainability advisory committee which brings together sustainability professionals to advance ethical and sustainable business practices across the sector, including ethical trade.</p>
FAIRTRADE	<p>Fairtrade is the most recognised and trusted sustainability label working to make trade fairer for the people who grow Fairtrade mark products.</p> <p>Our continued use of the Fairtrade chain of custody program and Fairtrade mark for our coffee provides 7-Eleven assurance that our coffee is purchased in accordance with ethical standards.</p> <p>During this reporting period our coffee beans were sourced from Brazil (Arabica), India (Robusta) and Honduras (Arabica varieties) from a collective of five producer organisations – collectively serving 3500+ farmers.</p>

Photo by Julio Cesar Huber



SECTION 7

Outlook



Table 9 outlines our commitments for the next reporting period, covering 1 January to 31 December 2025.

Table 9: Summary of 2025 commitments

WHAT WE DO	COMMITMENTS	PLANNED ACTIONS FOR 2025
<ul style="list-style-type: none"><li>— Set reporting and governance requirements</li><li>— Embed policy and framework objectives in SEA operations and supply chains</li><li>— Implement risk assessment and monitoring processes</li><li>— Set expectations around non-compliance and remediation</li></ul>	<ol style="list-style-type: none"><li>1. Embed our MS Policy and Framework objectives in our operations and supply chains by upskilling our Suppliers to help them meet our risk mitigation objectives, including Modern Slavery detection, reporting and remediation.</li><li>2. Upskill our Team Members to help them meet our risk mitigation objectives, including Modern Slavery detection, reporting and prevention.</li><li>3. Implement risk assessment and monitoring processes to ensure our due diligence processes are best practice, including systems to monitor and evaluate supply chain risk assessment, reporting and remediation.</li><li>4. Set reporting and governance requirements.</li></ol>	<ul style="list-style-type: none"><li>— Update our Supplier training by practically implementing our Modern Slavery Risk Management Framework.</li><li>— Continue engagement with Suppliers by providing open access to training.</li><li>— Continue pursuing opportunities for Industry collaboration and partnerships.</li><li>— Continue delivering Modern Slavery training to all our Team Members.</li><li>— Refresh our annual Supplier Modern Slavery risk assessment, including High-Risk Supplier site Residual Risk assessment.</li><li>— Continue to engage with our High-Risk Suppliers to close any gaps in contractual obligations relating to Modern Slavery.</li><li>— Continue to grow our High-Risk Supplier network on Sedex by actively communicating our expectations and imposing our standards via our contracts.</li><li>— Publish Modern Slavery metrics, including number of incidents reported, substantiated and remediated.</li></ul>







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



Do What's Right



## SECTION 8

## Statement of Approval



## Forward-looking statements

To the extent that this Statement contains forward-looking statements in relation to the group, including statements regarding intent, goals, objectives, initiatives, commitments and current expectations with respect to 7-Eleven's business and operations, the forward-looking statements are based on 7-Eleven's current information and assumptions including with respect to risk, regulatory, financial and other relevant factors that will exist and may impact the group's business and operations in the future.

Actual results, developments and performance may be materially different to any forward-looking statements expressed.

## Statement of Approval

This Statement was prepared by the MS Committee in consultation with the SLT and the Executive Risk Committee. This Statement was formally 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 (and it's wholly owned subsidiaries 7-ELEVEN STORES PTY LTD ACN 005 299 427 and CONVENIENCE HOLDINGS PTY LTD ACN 143 746 356); SEA PLANT & EQUIPMENT PTY LTD ACN 601 889 614 (and it's wholly owned subsidiary 7-ELEVEN AUSTRALIA PTY LTD ACN 637 676 558; it's intermediary holding company AR BIDCO PTY LTD ACN 673 156 851 and its Australian holding company AR HOLDCO PTY LTD ACN 673 156 593.

Shinji Abe is the Executive Chairman and director of Convenience Group Holdings Pty Ltd and a director of AR HoldCo Pty Ltd, AR BidCo Pty Ltd, 7 Holdings Pty Ltd, 7-Eleven Stores Pty Ltd, Convenience Holdings Pty Ltd, SEA Plant & Equipment Pty Ltd and 7-Eleven Australia Pty Ltd.

11/06/2025



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## SECTION 9

# Definitions

## High Risk Supplier

refers to Suppliers that meet our annual spend threshold (currently over AU\$500,000) and any Supplier that falls below the spend threshold where the Inherent Risk is assessed as high, and we form the view that the Supplier should be assessed.

## Inherent Risk

in the context of Modern Slavery refers to the broad evaluation of labour and human rights, health and safety, business ethics and legal compliance risks by origin of country and industry or sector mapping before Modern Slavery controls are put in place.

## Modern Slavery

is defined in section 4 the Modern Slavery Act 2018 (Cth), and describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom and includes practices such as trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour services; and the worst forms of child labour.

## Residual Risk

in the context of Modern Slavery refers to specific labour and human rights, health and safety, business ethics and legal compliance risks that remain after risk mitigation measures have been put in place. We assess Residual Risk through the Sedex self-assessment questionnaires and site-specific audits.

## Supplier/s

refers to any party that provides 7-Eleven Branded Products and/or 7-Eleven Contracted Services.

## 7-Eleven Branded Product

means products that feature the 7-Eleven logo or has references to 7-Eleven, for example the use of the "only at 7-Eleven" label.

## 7-Eleven Contracted Services

means ongoing services, or support delivered or provided to 7-Eleven Australia within a risk category identified following completion of an Inherent Risk assessment (adjusted annually), which includes, but not limited to: cleaning, facilities management, security, warehousing and construction. Unless explicitly stated 7-Eleven Contracted Services are included in the use of the broader term "Suppliers" throughout this document.

## Team Members

refers to all full-time, part-time and casual employees situated across the 7-Eleven support offices, and corporate and franchised stores.



SECTION 9

# Appendices

Appendix 1 – Australian Modern Slavery Act Mandatory Reporting Criteria

MANDATORY CRITERIONS	AUSTRALIAN MODERN SLAVERY ACT MANDATORY REPORTING CRITERIA	STATEMENT SECTION
1	Identify each reporting entity covered by the joint statement.	Section 1
2	Describe the structure, operations and supply chains of each reporting entity covered by the joint statement.	Section 1 and Section 2
3	Describe the risks of Modern Slavery practices in the operations and supply chains of each reporting entity covered by the joint statement and any entities that each of those reporting entities owns or controls.	Section 5 and Section 6
4	Describe the actions taken by each reporting entity covered by the joint statement and any entities that each of those reporting entities owns or controls to assess and address these risks, including due diligence and remediation processes.	Section 3 and Section 4
5	Describe how each reporting entity covered by the joint statement assesses the effectiveness of actions being taken to assess and address Modern Slavery risks.	Section 4
6	Describe the process of consultation with each reporting entity covered by the joint statement and with any entities that each of those reporting entities own or control.	Section 1 and Section 3
7	Any other relevant information.	Section 7 and Section 8





