

MODERN SLAVERY POLICY



1 7-Eleven's commitment

7-Eleven and all the businesses in our group of companies ("**We**") acknowledge our responsibility to identify and address modern slavery in our operations and supply chains and are fully committed to complying with our obligations under the Modern Slavery Act 2018 (Cth) (the **Act**). Our Values and Our Vision are to maintain our position as Australia's leading convenience retailer through sustainable growth and operating our business with high ethical standards.

We are committed to ensuring that We have effective systems and controls for detecting and eliminating modern slavery within our business operations and supply chains.

In this Policy, *modern slavery* has the same meaning as section 4 of the Act, and describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom.

7-Eleven recognises modern slavery is an insidious, complex and multi-faceted problem which includes:

- human trafficking
- slavery
- servitude
- forced labour
- debt bondage
- forced marriage
- deceptive recruiting for labour services
- child labour ¹

2 Application

This Policy applies to:

- all persons working for or on behalf of 7-Eleven in any capacity, including:
 - officers, directors and Team Members;
 - Franchisees, including officers and directors; and
 - agency workers, contractors, consultants, volunteers, joint venturers, business partners and any other third party suppliers (together "**Suppliers**").

This Policy covers all procurement of goods and services undertaken by the 7-Eleven group and its supply chains.

Team Members are responsible for identifying and managing modern slavery risks, obligations and issues on an ongoing basis. We expect all Team Members to read, understand and comply with this Policy.

¹ Child labour is taken to mean "the worst forms of child labour" being situations where children are subjected to slavery or similar practices such as forced labour or engage in hazardous work <https://www.modernslavery.gov.au/about-modern-slavery/types-modern-slavery/worst-forms-child-labour>

We expect our Suppliers to read and understand this Policy and comply with the requirements set out in section 3.2 (Implementing this Policy in our supply chains) below, in addition to fulfilling their obligations under provisions relating to modern slavery in the relevant Supplier agreements.

Team Members should read this Policy in conjunction with the Code of Conduct, the Modern Slavery Risk Management Framework, Disciplinary Policy and other associated policies and procedures issued by 7-Eleven from time to time.

Suppliers should read this Policy in conjunction with the Modern Slavery Risk Management Framework and any obligations relating to modern slavery set out in their agreements with 7-Eleven.

This Policy is available to all Team Members through the People Hub on the 7-Eleven intranet. This Policy is also available to Suppliers and other third parties via the 7-Eleven website at www.7eleven.com.au/modern-slavery-statement.html.

3 Risk Management in our Operations and Supply Chain

Modern slavery incidents are often complex and hard to detect, especially those connected to the activities of our Suppliers and their supply chain.

We regularly assess the risks of modern slavery in our operations and supply chain. Identifying these risks is the first step to minimising them and improving our ability to detect modern slavery practices.

3.1 Implementing this Policy in our operations

7-Eleven is committed to the prevention of modern slavery in all its forms within its operations.

7-Eleven prohibits the use of all forms of modern slavery in our operations and takes steps to ensure that our Team Members do not impose or knowingly facilitate forced or compulsory labour for our ultimate benefit. 7-Eleven's employment practices comply with national law and applicable collective agreements.

To meet our commitments, We require all Team Members to comply with the following principles:

- Read, understand and comply with this Policy which articulates our commitment to prevent acts of modern slavery and reduce risks of acts of modern slavery within our operations and supply chain;
- 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 this Policy;
- Proactively identify, assess, mitigate and remediate (where appropriate) 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;
- Conduct regular and adequate training including health and safety training and modern slavery training for all new Team Members and refresher training every 2 years or when there is a change in legislation, so that Team Members can recognise modern slavery practices and take steps to avoid such practices;

- Comply with our Code of Conduct Policy which sets out the legal and ethical behaviour expected to ensure We conduct our business with integrity and compliance with all laws; and
- Communicate this Policy and related documents (including the Modern Slavery Risk Management Framework) and legislation to all relevant parties including Suppliers.

3.2 Implementing this policy in our supply chains

In our supply chains, We strive to reduce the risk of contributing to or being linked to modern slavery through proactive risk identification, assessment and mitigation, and providing or supporting remediation where appropriate.

We require that our Suppliers, as a minimum:

- do not engage in any form of modern slavery;
- adhere to all applicable domestic laws; and
- 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 practices and adheres to all applicable domestic laws.

7-Eleven works with our Suppliers to eliminate modern slavery in our supply chain. The extent of our due diligence conducted in the procurement process depends on the nature of the procurement and the annual spend on the goods and services being sourced. We have in place and continue to develop systems and processes to reduce the risk of modern slavery in 7-Eleven's supply chain. including:

- incorporating modern slavery provisions in High Risk Supplier contracts;
- conducting modern slavery risk assessment of High Risk Suppliers to determine Inherent Risk and Residual Risk across our operations;
- providing modern slavery training to Team Members involved in procurement to ensure they can identify and address risks of modern slavery within our supply chain in order to determine appropriate mitigation measures;
- making available voluntary modern slavery training to all our Suppliers, which is available on our website;
- building awareness with High Risk Suppliers around modern slavery requirements and developing skills to identify modern slavery risks within their operations and supply chain;
- requiring High Risk Suppliers to onboard to Sedex (or similar assessment platform) to conduct a self-assessment by completing the Self Assessed Questionnaire for each site supplying 7-Eleven at the time of onboarding and annually thereafter, to enhance supply chain transparency and risk mitigation;

- requiring High Risk Suppliers to implement audit, investigation, reporting and remediation and other corrective action plans for any breaches of this Policy or our Modern Slavery Risk Management Framework;
- performing ongoing monitoring and reporting against compliance by monitoring High Risk Supplier site risk ratings, audit requirements and outcomes on Sedex; and
- taking appropriate action to confirm compliance with recommended remediation action or otherwise where appropriate exercising any contractual right of termination of the contract.

4 Modern Slavery Risk Management Framework

7-Eleven strives to improve its modern slavery risk assessment processes in line with best practice with the implementation of our Modern Slavery Risk Management Framework. 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. It also allocates ownership of responsibilities for internal governance, risk assessment, risk management and remediation monitoring.

5 External reporting

Externally, 7-Eleven publishes an annual joint Modern Slavery Statement on behalf of all group reporting entities, in accordance with the requirements of the Act. The Statement outlines our approach to managing modern slavery risks within our business operations and supply chains. For each reporting period the Statement describes the risk of modern slavery practices in the operations and supply chain of each reporting entity, the internal consultation processes that are in place, the actions we've taken to assess and address the risks including due diligence and remediation processes, how We assess the effectiveness of our actions, how We track the progress of our modern slavery annual commitments, and identify areas for improvement.

The Statement is published on the Australian Government's online Modern Slavery Statements Register (<https://modernslaveryregister.gov.au/>) and on our website (<https://www.7eleven.com.au/>).

6 Grievance mechanism

We are committed to fairly, efficiently and confidentially deal with any allegations of modern slavery in our operations or supply chains in the appropriate manner. We continue to enhance our systems and processes to ensure We identify and respond to these concerns as effectively as possible.

All Team Members are encouraged to promptly report any actual, potential or suspected instances of modern slavery to their line manager, the Whistleblower Hotline or the Modern Slavery Committee. Where there is any doubt as to the correct reporting route, Team Members should consult the Whistleblower Policy. In particular, the Whistleblower Policy provides details on the specific support mechanisms that are available to Team Members with wage underpayment concerns relating to the 7-Eleven network.

7-Eleven maintains a reporting mechanism for concerns and reporting of matters relating to modern slavery, which allows confidential or anonymous reporting to ensure that any modern slavery concerns can be reported without fear of any detrimental treatment, including dismissal, demotion, discrimination, harassment, intimidation, disciplinary action, bias, threats or other unfavourable treatment, as a result of reporting.

We expect and encourage Suppliers to implement effective and accessible grievance reporting channels for their personnel, which may include hotlines, managed electronic inboxes, apps etc., and to ensure that at least one of these channels allows for anonymous reporting.

Suppliers are also expected to report any actual or suspected instances of modern slavery through our confidential Whistleblower Service (1800 667 471) or by contacting our Modern Slavery Committee at ModernSlaveryCommittee@7eleven.com.au.

7-Eleven expects all Team Members visiting Supplier sites or 7-Eleven stores to identify and report any suspected or observed modern slavery to the Modern Slavery Committee or via the grievance mechanism.

7 Consequences of non-compliance with this policy

The achievement of this Policy and compliance with the requirements of the Act and other relevant legislation is a collective business responsibility of everyone that works with and for our business, including our Suppliers.

We take violations of this Policy seriously and will act as We deem appropriate.

Any Team Member who fails to comply with this Policy may face disciplinary action, up to and including termination of employment in accordance with the Disciplinary Policy.

Any franchisee who fails to comply with this Policy may face disciplinary action, up to and including termination of the franchise agreement.

A Supplier that fails to comply with this Policy, or its contractual obligation in respect of modern slavery, may face action including 7-Eleven reporting the practice to the relevant authorities, replacing the Supplier and/or exercising any contractual right of termination.

8 Governance and review of this policy

The board of Convenience Group Holdings Pty Ltd is ultimately accountable for managing risk including modern slavery, whilst our Senior Leadership Team, the Executive Risk Committee and the Modern Slavery Committee are accountable for overseeing risk management.

The Modern Slavery Committee oversees the activities to identify and address modern slavery in our operations and supply chains.

Team Members are encouraged to provide feedback and suggestions to the Modern Slavery Committee at ModernSlaveryCommittee@7eleven.com.au.

We:

- review and update this Policy at least once every 3 years (or when there are material changes to the Act) to ensure its effectiveness; and
- report annually on our efforts to combat modern slavery, including any incidents and our response in our annual Modern Slavery Statement.

9 Definitions

For the purposes of this Policy, the following definitions will apply:

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 Policy.

High Risk Supplier refers to any party that provides 7-Eleven Branded Products and/or 7-Eleven Contracted Services that meet our annual spend threshold (currently over AU\$500,000 as adjusted annually) 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.

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 self-assessment questionnaires and site-specific audits.

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

10 Related policies and documents

This Policy should also be considered alongside:

- Our Code of Conduct, which sets out the legal and ethical behaviour expected of our Team Members;
 - [Whistleblower Policy](#), which outlines our process for receiving and processing grievances.
 - Disciplinary Policy, which outlines the disciplinary process for Team Members; and
- Our Modern Slavery Risk Management Framework, which outlines the processes and systems We have in place for monitoring, managing and mitigating modern slavery risks.

APPROVAL & REVIEW

Document Control	
Policy Owner	Sustainability Manager
Review Committee	Modern Slavery Committee
Approval Authority	Chief Executive Officer and Executive Chairman
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Enquiries	ModernSlaveryCommittee@7eleven.com.au

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