

Modern Slavery Risk Management

1.2

October 2026

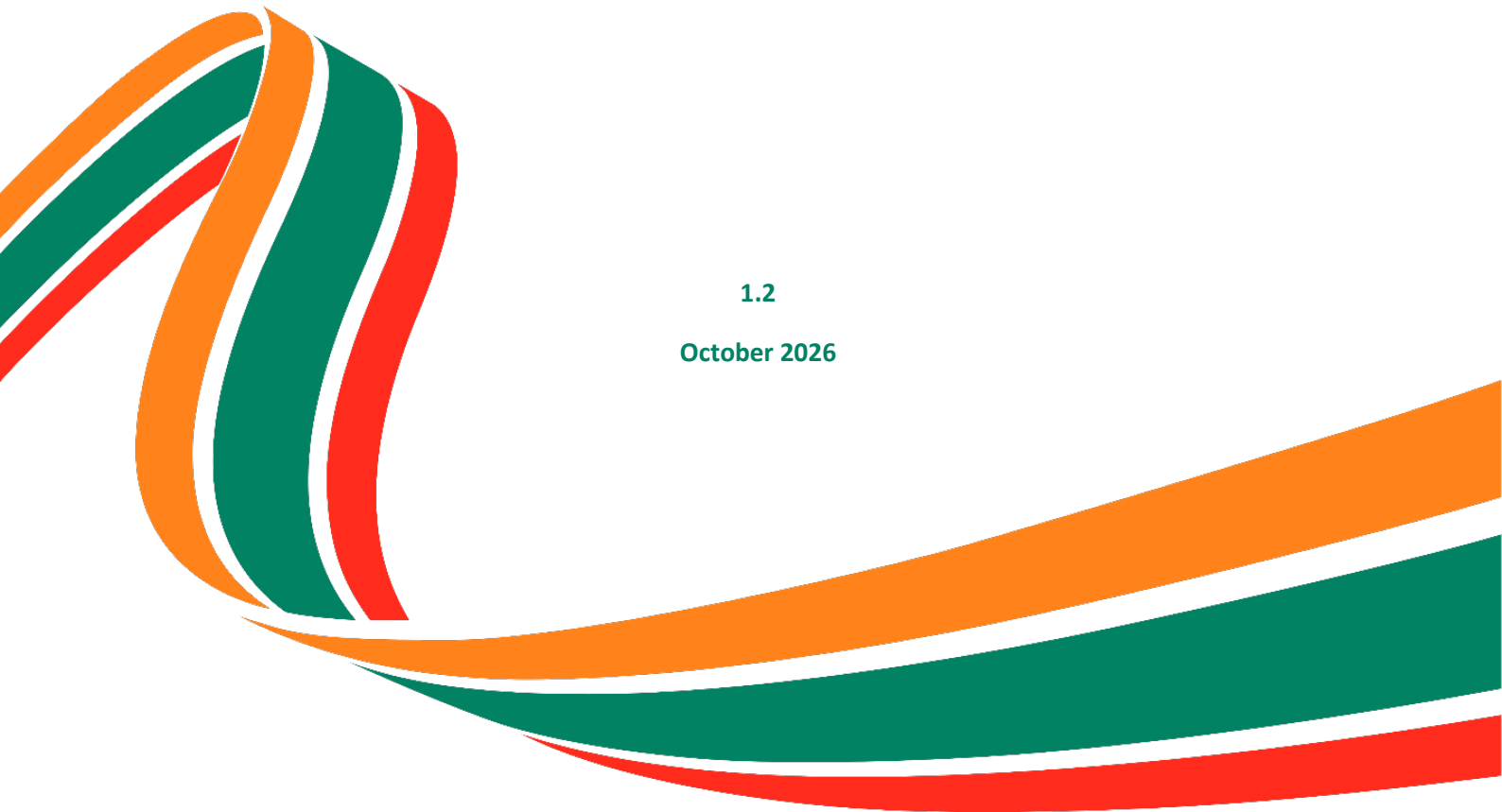


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1 PURPOSE

- 1.1 7-Eleven Stores Pty Ltd and the associated entities in the group of companies (“We”, “Our” or “7-Eleven Australia”) are vulnerable to risks of Modern Slavery across our operations and supply chains.
- 1.2 The purpose of this Modern Slavery Risk Management Framework (the **Framework**) is to outline the processes and systems we have in place for monitoring, managing and mitigating Modern Slavery risks, in pursuit of our commitment to reducing and eradicating the risk of Modern Slavery practices in our supply chains and business operations.

2 SCOPE & APPLICATION

- 2.1 This Framework covers all our operations and business activities.
- 2.2 It applies to all Team Members. Team Members are expected to comply with this Framework, the Code of Conduct and the Modern Slavery Policy as it forms a key requirement of the onboarding of new Team Members and refresher training for existing Team Members. All Team Members are responsible for identifying and managing Modern Slavery risks, obligations and issues on an ongoing basis.
- 2.3 It applies to all Suppliers. Suppliers are encouraged to read this Framework in conjunction with any obligations relating to Modern Slavery set out in their agreements with 7-Eleven Australia.

3 DEFINITIONS

- 3.1 In this Framework:
 - (a) **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.
 - (b) **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.
 - (c) **High Risk Supplier** refers to Suppliers that meet our annual spend threshold (currently over AU\$500,000 and may be 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.
 - (d) **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.
 - (e) **Modern Slavery** is defined in section 4 of Australia’s *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.

- (f) **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.
- (g) **Supplier/s** refers to any party that provides 7-Eleven Branded Products and/or 7-Eleven Australia Contracted Services.
- (h) **Team Members** refers to all full-time, part-time and casual employees situated across the 7-Eleven Australia support offices, and corporate and franchised stores.

4 GOVERNANCE

AMBITION

- 4.1 At 7-Eleven Australia, 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' is lived through our commitment to addressing Modern Slavery risks across our operations and supply chains by:
- Identifying and assessing the risk of Modern Slavery within our business operations and supply chains.
 - Establishing and maintaining effective systems and controls for detecting and mitigating Modern Slavery within our business operations and supply chains by:
 - providing training on Modern Slavery and human rights to our Team Members;
 - engaging with our Suppliers on our Modern Slavery objectives through our tailored online training module available to all Suppliers, reinforcing our Modern Slavery Policy, our Code of Conduct and Whistleblower policies;
 - continuing to assess risk in our supply chain by implementing supplier self-assessment questionnaire and Sedex Members Ethical Trade Audits (**SMETA**) audits for High Risk Suppliers; and
 - assessing effectiveness of actions taken to address risks of Modern Slavery.

BOARD

- 4.2 The 7-Eleven Australia Board is ultimately responsible for compliance with Modern Slavery legislation. The Board is responsible for approving 7-Eleven Australia's annual Modern Slavery Statement.

SENIOR LEADERSHIP TEAM

- 4.3 The 7-Eleven Australia Senior Leadership Team shall:
- Nominate senior representatives, from the relevant business areas, to form members of the Modern Slavery Committee.
 - Approve any updates to this Framework.
 - Approve remediation plans or corrective actions for serious breaches or repeated non-compliance with the Policy and this Framework.
 - Approve the termination of a Supplier contract in cases of serious Modern Slavery breaches.

- Promote a culture of best practice and continuous improvement.
- Review and endorse to the Board, on an annual basis, 7-Eleven Australia's Modern Slavery Statement.

EXECUTIVE RISK COMMITTEE

4.4 The Executive Risk Committee shall:

- Review updates to the Framework.
- Engage and oversee internal and external audits or other risk management activities to ensure this Framework is being implemented effectively.
- Provide guidance in relation to industry best practice for Modern Slavery risks.
- Review the adoption of internal risk management tools and systems.
- Manage reports made under 7-Eleven Australia's Whistleblower Policy or received through other grievance mechanism channels that relate to Modern Slavery issues.
- Oversee the identification and management of emerging Modern Slavery risks.
- Ensure that remediation plans and corrective actions are implemented on a timely basis.

MODERN SLAVERY COMMITTEE

4.5 The Modern Slavery Committee shall:

- Develop and implement initiatives to ensure Modern Slavery risk management is embedded across the business in accordance with this Framework.
- Maintain an up-to-date view of anti-Modern Slavery best practice and emerging issues to guide 7-Eleven Australia's approach, including preparing reports on trends and impacts.
- Manage the development and updates of the Framework.
- Manage annual Supplier risk assessments.
- Develop and manage Modern Slavery training.
- Raise awareness of the Whistleblower Policy and relevant grievance mechanisms.
- Review the outcomes of identified or suspected non-compliance with the Framework and our Modern Slavery Policy.

5 FRAMEWORK PRINCIPLES

OUR POLICY

- 5.1 Our Modern Slavery Policy (the **MS Policy**) covers our business operations and supply chain. The Policy applies to all Team Members, officers, directors and Suppliers.
- 5.2 The MS Policy sets clear objectives for all Team Members and Suppliers and sets expectations for compliance with Modern Slavery legislation, how to report actual or potential Modern Slavery issues and the consequences for non-compliance with the MS Policy.
- 5.3 The MS Policy is reviewed and updated every three (3) years or when there are changes in Modern Slavery legislation.

RISK ASSESSMENT AND MONITORING

- 5.4 7-Eleven Australia complies with the reporting requirement under the *Modern Slavery Act 2018* (Cth) and produces and publishes an annual Modern Slavery Statement.
- 5.5 Each business area is accountable for assessing and addressing Modern Slavery issues in its operations and Supplier contracts and a senior representative from the relevant business area (Senior Representative) is responsible for co-ordinating the management of the risks.
- 5.6 The Senior Representatives conduct risk assessments to determine Inherent Risk and Residual Risk across their operations. Currently, the risk assessment addresses Modern Slavery risks of High Risk Suppliers.
- 5.7 We will perform due diligence on new and existing Suppliers to assess their risk level and determine appropriate mitigation procedures.

EMBED MS POLICY IN SUPPLY CHAIN AND OPERATIONS

- 5.8 We have in place, and are continually improving, systems and processes designed to reduce the risk of Modern Slavery in our business operations and supply chain including, but not limited to:
 - Inclusion of Modern Slavery contractual obligations in High Risk Supplier contracts.
 - Mandatory training for all Team Members on our Modern Slavery policies and processes applicable to their role.
 - Voluntary Modern Slavery training available to all Suppliers.
 - A system to store Supplier information and risk data.
- 5.9 We expect High Risk Suppliers to understand and adhere to the MS Policy and this Framework, including, but not limited to:
 - Compliance with Modern Slavery contractual obligations.
 - Adoption of tools, systems or platforms as specified by 7-Eleven Australia to enhance supply chain transparency and risk mitigation.
 - Audit and investigation requirements.
 - Reporting and grievance mechanisms.
 - Remediation and other corrective action plans and procedures.

RISK MANAGEMENT AND AUDIT

5.10 We expect all Team Members to co-operate with any appointed internal and external auditors, providing them with relevant information and documents as requested.

5.11 7-Eleven Australia undertakes an Inherent Risk assessment on an annual basis. Where a Supplier is assessed as High Risk Supplier, they will be notified by 7-Eleven Australia. Within 30 Business Days a High Risk Supplier is required to:

- Register on or confirm they are a member of Sedex (or an alternative external data sharing risk platform approved by 7-Eleven Australia (Alternative Platform)) and accept 7-Eleven Australia's request on Sedex to connect its sites.
- Complete the site-specific Sedex or Alternative Platform Self-Assessment Questionnaire (SAQ) for each site supplying 7-Eleven Australia within 30 Business Days of confirming membership of, or joining, Sedex or the Alternative Platform, as applicable, and annually thereafter.
- If the High Risk Supplier fails to comply with the registration or completion of the SAQ within the relevant time frame set out above the matter will be escalated as follows:

Escalation trigger	Escalation to:	Timeframe for compliance
Failure to register and/or complete the SAQ	Product Owner	30 Business Days from the date the Product Owner engages with the High Risk Supplier. Product Owner must as soon as practicable engage with the High Risk Supplier and in any event within 5 Business Days.
Product Owner unable to resolve matter	Area Lead	30 Business Days from the date the Area Lead engages with the High Risk Supplier. Area Lead must as soon as practicable engage with the High Risk Supplier and in any event within 5 Business Days.
Area Lead unable to resolve matter	Relevant SLT member	30 Business Days from the date the relevant SLT member engages with the High Risk Supplier.
Relevant SLT member unable to resolve matter	ERC for remediation or corrective action plan. SLT for approval of remediation and action plans, as required.	The next scheduled meeting of ERC and SLT, as the case may be.

- 5.12 A High Risk Supplier must comply with requests from 7-Eleven Australia to undertake an audit in line with the Ethical Trading Initiative Code (ETI) and the Sedex Members Ethical Trade Audit (SMETA).
- 5.13 If a High Risk Supplier is a Sedex member the whole process, from audit scope, through High Risk Supplier completion to final auditor verification, is tracked through Sedex, enabling 7-Eleven Australia to have oversight of progress and act where necessary.
- 5.14 If a High Risk Supplier is a member of an Alternative Platform or refuses an audit request through Sedex:
- 5.14.1 the High Risk Supplier agrees to permit 7-Eleven Australia, or an auditor appointed by 7-Eleven Australia (**Auditor**), to access the High Risk Supplier's personnel and any systems, sites, premises, facilities, books, records, data, documents, equipment and other property in the High Risk Supplier's possession, custody or control relevant to the audit scope;
- 5.14.2 if the audit reveals a critical or high risk finding, the High Risk Supplier must within 3 months submit a remediation plan to 7-Eleven Australia; and
- 5.14.3 any non-compliance identified during an audit must be rectified by the High Risk Supplier at its cost within the timelines as reasonably determined by the Auditor.

REMEDIATION OF INCIDENTS AND NON-COMPLIANCE

- 5.15 We are committed to working with our Team Members and Suppliers to remediate any breaches of the MS Policy and this Framework and to fairly and confidentially deal with any allegations of Modern Slavery in our business operations or supply chains. We will continue to enhance our systems and processes to ensure we identify and respond to these concerns as effectively as possible.
- 5.16 We expect High Risk Suppliers to maintain appropriate records relating to any identified Modern Slavery incident and to notify us of such incidents. High Risk Suppliers are required to share such records with 7-Eleven Australia on request.
- 5.17 We are committed to working with Suppliers to remediate any breaches of the MS Policy and this Framework and expect High Risk Suppliers to adhere to appropriate remediation processes, as set out in this Framework, or otherwise reasonably determined by us including but not limited to:
- Appropriate remediation of identified Modern Slavery practices or non-compliance with this Framework, as determined by an external independent audit or identified otherwise.
 - Disclosure of action plans and satisfactory completion of such actions.
 - Taking appropriate action for non-compliance.
- 5.18 The High Risk Supplier is responsible for completing all corrective actions within agreed timescales, and for obtaining verification of closure from the independent auditors.
- 5.19 If a High Risk Supplier fails to undertake appropriate remediation action or delays action by more than three (3) months from the reported incident, we will take appropriate action under the relevant contract to ensure High Risk Supplier compliance, or otherwise where appropriate we may terminate the contract.

REPORTING

- 5.20 All Team Members are expected to promptly report any actual or suspected instances of Modern Slavery to the Whistleblower Hotline, their line manager or the Modern Slavery Committee.

- 5.21 7-Eleven Australia acknowledges that some individuals may be reluctant to raise issues as they may fear losing their job, experiencing retribution from their employers or deportation due to their immigration status. 7-Eleven Australia will always focus on reducing harm to the individual(s).
- 7-Eleven Australia maintains a reporting mechanism for concerns and reporting of matters relating to Modern Slavery, which allows confidential or anonymous reporting to ensure stakeholders may report concerns without fear of being subjected to any detrimental treatment.
- 5.22 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 for Team Members with wage underpayment concerns.
- 5.23 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.
- 5.24 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.

6 FRAMEWORK FLOWCHARTS

FRAMEWORK GENERAL OVERVIEW



MODERN SLAVERY POLICY, CONTRACTS AND TRAINING

Modern Slavery Policy

We publish our MS Policy internally and make it available online.



We review the MS Policy every three (3) years or when there is a change in legislation

Supplier Contracts and Service Agreements

New suppliers of 7-Eleven branded products or contracted services that have an annual spend over AUD\$500,000 must:



Include Modern Slavery contractual obligations in contract / trading terms.

Existing suppliers of 7-Eleven branded products or contracted services that have an annual spend over AUD\$500,000 must:



Include Modern Slavery contractual obligations when contract / trading terms are renegotiated or extended.

Non-7-Eleven branded products suppliers are expected to:



Operate under all applicable laws and regulations.

Training

Modern Slavery training is mandatory for all new Team Members.



We review training material every two (2) years or when there is a change in legislation.

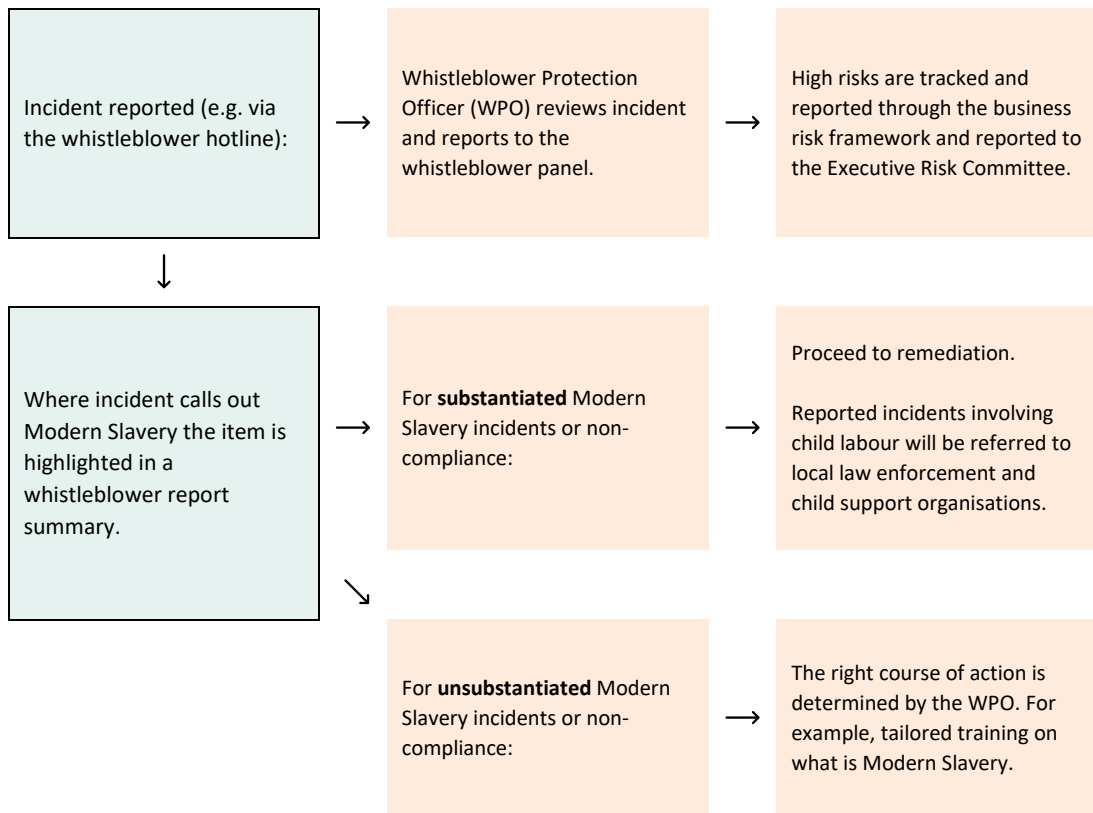
Modern Slavery training is available to all our suppliers via our website.



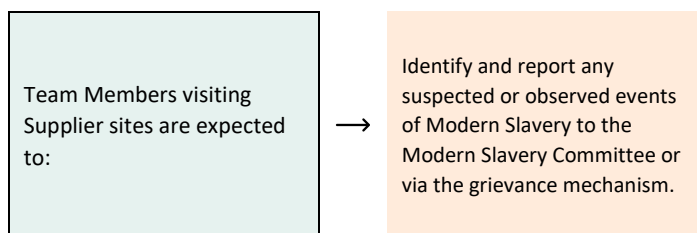
We will review training material every two (2) years or when there is a change in legislation.

REPORTING RISKS AND INCIDENTS

Reporting Risks and Incidents

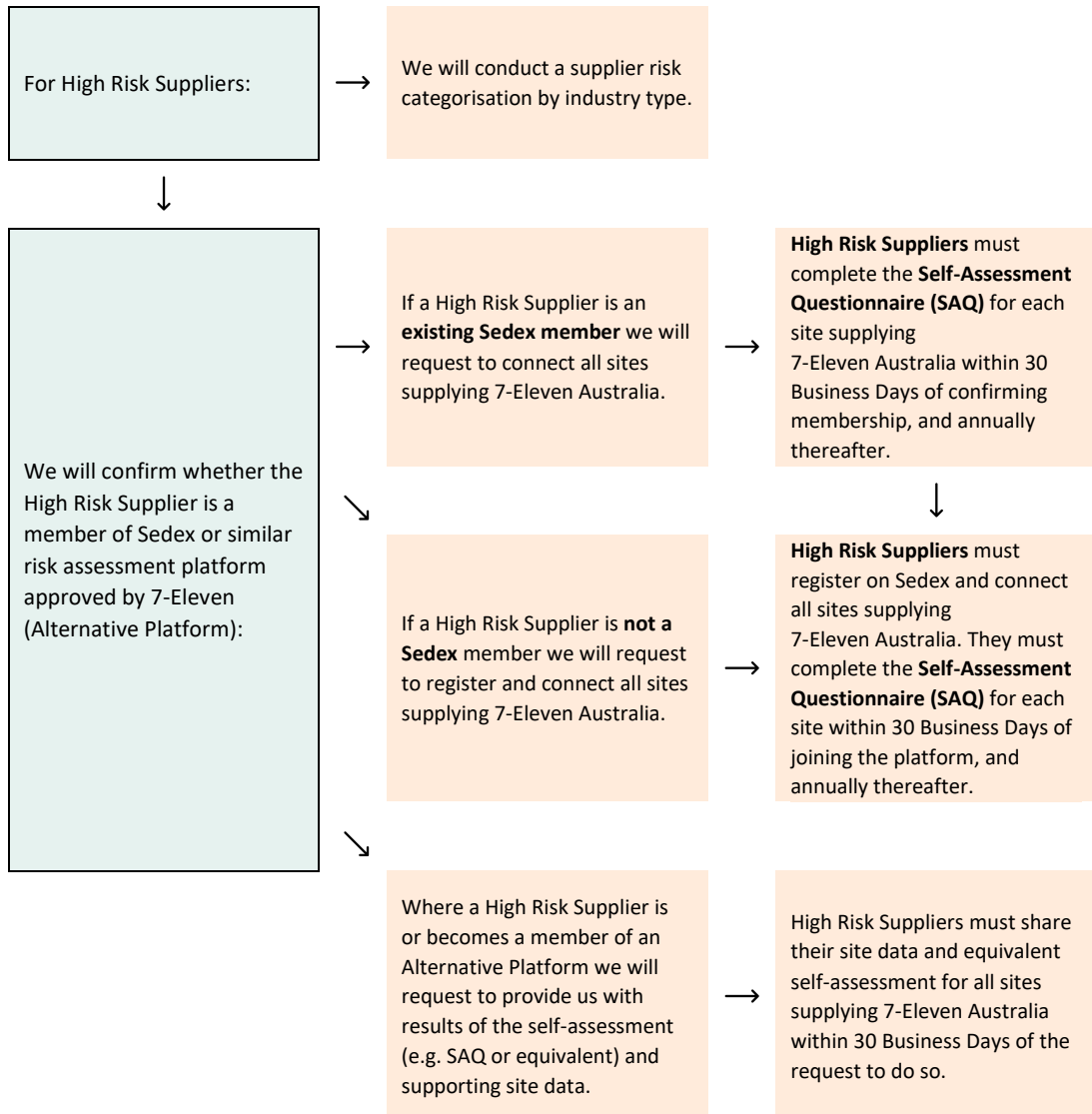


Reporting Risks and Incidents for Team Members Visiting Supplier Sites

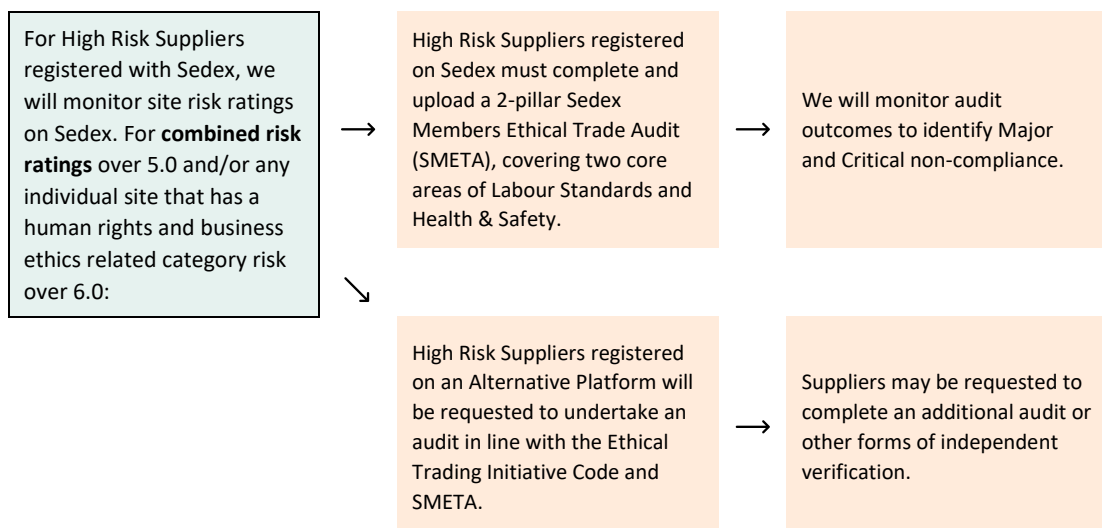


RISK ASSESSMENTS

Inherent Risk Assessment

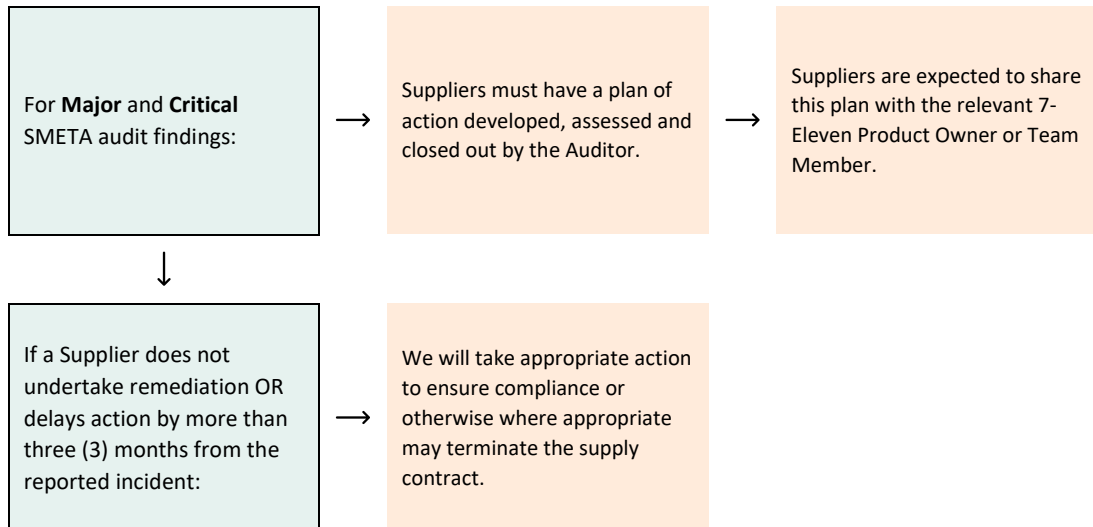


Residual Risk Assessment



REMEDATION

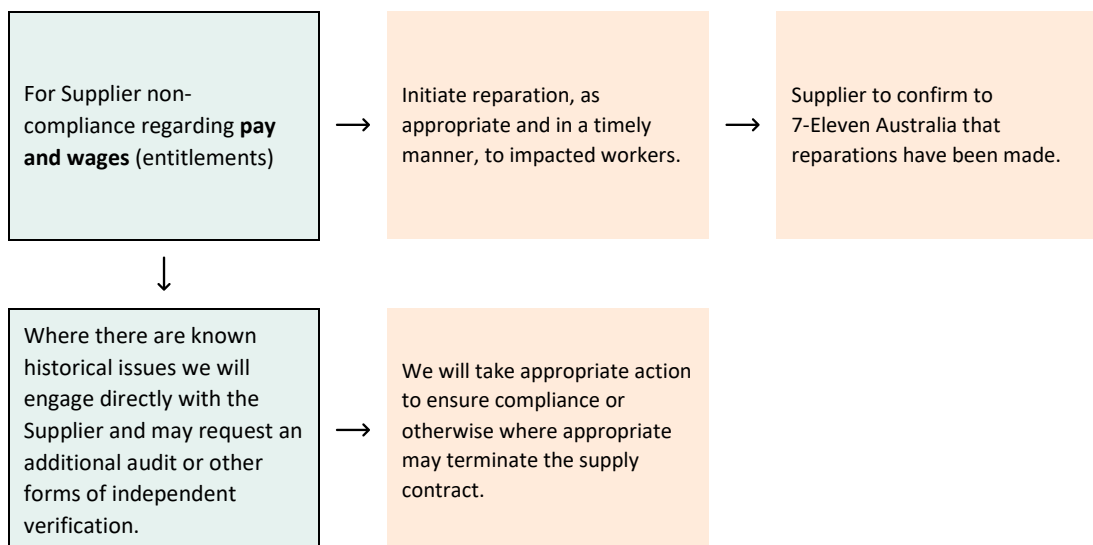
Audit Action Plans for Suppliers



Audit Action Plans for Team Members

Team Members must co-operate with any appointed internal and external auditors, providing them with relevant information and documents as requested.

Pay and Wages



7 FRAMEWORK CONTINUOUS IMPROVEMENT

7.1 To maintain and continuously improve the effectiveness of this Framework, the Modern Slavery Committee will:

- Regularly monitor and annually review the effectiveness of the risk identification and management measures described in this Framework by assessing the adequacy and currency of practices, procedures and systems to ensure that they are up to date and being adhered to.
- Ensure the Senior Leadership Team and the 7-Eleven Australia Board are briefed on material risks and incidents.
- Periodically undertake independent reviews of processes to identify areas for improvement, i.e. through internal audits and target reviews of specific areas.

7.2 For any queries or to provide feedback regarding the Framework, please contact the Modern Slavery Committee at ModernSlaveryCommittee@7eleven.com.au.

8 RELATED POLICIES

8.1 This Framework should also be considered alongside the following policies and procedures:

- Modern Slavery Policy, which outlines Modern Slavery in relation to our business operations and supply chain and key grievance mechanisms.
- 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.

9 APPROVAL & REVIEW

Document Control		
MS Policy Owner	Modern Slavery Committee	
Approval Authority	Senior Leadership Team	
Version Control		
Version Number	Date Issued	Comment
V1.0	13 December 2024	Approved version
V1.1	20 May 2025	Updated definitions
V1.2	09 October 2026	Escalation processes added