



Modern Slavery Report



Pursuant to the Fighting Against
Forced Labour and Child Labour
in Supply Chains Act, S.C. 2023, c.9

For the Financial Year ended
April 28, 2024



CIRCLE K





Part of Alimentation Couche-Tard

1. Introduction

The *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, S.C. 2023, c.9 (the “**Act**”) requires that businesses state actions they have taken during the fiscal year to prevent and reduce the risk of forced labour or child labour within their operations and supply chain. This joint report is being submitted by Alimentation Couche-Tard Inc. (“**ACT**”) for the financial year starting May 1, 2023 and ending April 28, 2024 (the “**Reporting Period**”) and on behalf of the wholly-owned (directly or indirectly) and controlled entities (as such term is defined in the Act identified below that have been determined to be reporting entities under the Act (collectively, the “**Reporting Entities**”). As of 2022, Circle K Norge AS, a wholly-owned subsidiary of ACT, is a reporting entity under the *Transparency Act – Åpenhetsloven* (Norway). For purposes of this report, the Reporting Entities are listed below.

Reporting Entity	Country of Registration	Principal Business
Couche-Tard Inc.	Canada (Canada)	Laval, Québec, Canada
Mac’s Convenience Stores Inc.	Canada (Ontario)	Toronto, Ontario, Canada
Circle K Ontario LP	Canada (Ontario)	Toronto, Ontario, Canada
3326213 Nova Scotia Company	Canada (Nova Scotia)	Halifax, Nova Scotia, Canada
9121-2738 Québec inc.	Canada (Québec)	Laval, Québec, Canada

In this report, ACT and the Reporting Entities and their controlled subsidiaries are collectively referred to as the “**ACT Group**”, “**our**”, “**us**” or “**we**”.

As a global leader in convenience and mobility, the ACT Group recognizes its responsibility to use its global reach for the greater good. In 2022 we defined four values we live by: One Team, Do the Right Thing, Take Ownership, and Play to Win. With our worldwide footprint, we know that the decisions we make in our procurement processes can have a considerable impact on helping to build a more sustainable supply chain as we strive toward a cleaner, safer, equitable, respectful workplace and planet.

This report outlines the measures taken by the ACT Group to prevent and mitigate the risk of forced labour or child labour being used at any step of the production of goods sold as part of our retail and fuel activities in Canada or elsewhere or of goods imported into Canada by the ACT Group.

2. Measures taken to prevent and reduce the risks of forced labour and child labour

The growth journey of the ACT Group through acquisitions over the past 40 years has allowed our organization to learn from the practices and processes deployed across our decentralized operations in multiple geographies with a view to improve our global approach to environmental, social, and corporate governance (“**ESG**”), ethical standards and human rights. In general terms, we took the following measures during the Reporting Period to prevent and reduce the risk of forced labour or child labour in our business activities and global and regional supply chains:

- Prior to the end of the Reporting Period, we launched our global Supplier Code of Conduct (the “**Supplier Code of Conduct**”), allowing us to leverage existing practices across our multiple geographies by consolidating regional supplier-oriented requirements into a global document and aligning our expectations and requirements with all our suppliers, brokers and services providers contributing to our global and regional supply chains;



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- We affirmed the responsibility of the Human Resources and Corporate Governance Committee (the “**HRCG Committee**”) and Board of Directors of ACT (the “**Board**”) in overseeing matters related to the Act. The HRCG Committee assists the Board in carrying out its responsibilities by dealing with matters relating to ESG, including oversight of any matters covered by the Supplier Code of Conduct. The HRCG Committee is briefed on ESG-related matters on a quarterly basis;
- We accompanied the launch of our Supplier Code of Conduct with a company-wide training and acknowledgement for all our employees who are on the front lines of interactions with suppliers in procurement, merchandising, marketing and operation functions, as to the requirements and expectations we have set out for our supplier community in the Supplier Code of Conduct, including with respect to child labour and forced labour, to mitigate the risks of forced labour and child labour in our global and regional supply chains;
- As part of the groundwork leading to the launch of our Supplier Code of Conduct, we have started a benchmarking exercise across our operating geographies to identify current practices within the ACT Group with respect to supplier onboarding due diligence, including *know-your-client* processes (“**KYC**”), risk mapping, supplier questionnaires and supplier communications. While operating in a decentralized model, we are leveraging this exercise to align on our ambition to build and further implement global initiatives and processes that mitigate the risks of forced labour and child labour across our global and regional supply chains; and
- While our supplier agreements generally include contractual commitments on matters covered by our Supplier Code of Conduct, we have started to formalize our Suppliers’ engagement and adherence to the Supplier Code of Conduct. We have also started a benchmarking exercise to level set our service provider contracts and templates to include compliance with the Supplier Code of Conduct.

3. Structure, activities and global and regional supply chains

ACT was incorporated under Part IA of the *Companies Act* (Québec) (replaced by the *Business Corporations Act* (Québec) on February 14, 2011) by a certificate of amalgamation dated May 1, 1988. On December 15, 1994, the Corporation changed its corporate name from “Actidev Inc.” to “Alimentation Couche-Tard Inc.” Our common shares are listed on the Toronto Stock Exchange. Couche-Tard Inc., Mac’s Convenience Stores Inc. and Circle K Ontario LP are each wholly-owned subsidiaries of ACT. The other two Reporting Entities, 3326213 Nova Scotia Company and 9121-2738 Québec inc., are respectively subsidiaries of Circle K Ontario LP and of Mac’s Convenience Stores Inc. Headquartered in Laval, Québec, the ACT Group has a network of more than 16,700 stores, of which almost 13,100 offer road transportation fuel.

With our well-known Couche-Tard and Circle K banners, we are one of the largest independent convenience store operators in the United States and a leader in the convenience store industry and road transportation fuel retail in Canada, Scandinavia, the Baltics, as well as in Ireland. We also have an important presence in Poland and have recently expanded to Belgium, Germany, Luxembourg, and the Netherlands. In Asia, our network comprises 390 company-operated stores in Hong Kong, offering an on-the-go food offer as well as a variety of other merchandise items and services. More than 150,000 people are employed throughout our network.

With close to \$72 billion in revenue in fiscal 2023 and over 40 years’ experience operating convenience stores and fueling stations, our size and scale have enabled us to develop operational efficiencies that provide us with a competitive advantage, particularly for merchandising and procurement. We are continually modernizing our stores and tailoring our merchandising strategies to address the needs and the demands of



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our customers in the markets where we operate. Our global convenience and fuelling station activities are conducted through four kinds of sites:

COMPANY OPERATED	COMPANY OWNED, DEALER OPERATED (“CODO”)	DEALER OWNED, DEALER OPERATED (“DODO”)	FRANCHISE AND OTHER AFFILIATES (collectively, “Licensees”)
We control the real estate through ownership or lease agreement and operate the site.	We control the real estate through ownership or lease agreement.	The site is controlled and operated by an independent operator.	Sites operated by an independent operator through a franchising, licensing or similar agreement under one of our banners.
Some sites are operated by an agent we commission.	An independent operator pays us rent and operates the site.	We supply road transportation fuel through supply contracts.	
Includes 981 sites that sell only road transportation fuel.	We may supply road transportation fuel through supply contracts.	Some sites are subject to a franchise agreement, licensing or other similar agreement under one of our banners.	
	Some sites are subject to a franchise, licensing or other similar agreement under one of our banners.		

Our supply chain is complex and comprises global and regional supply chains. Around 90% of goods and services are centrally procured by the ACT Group and supplied to our company operated, and CODO sites, as well as certain DODO sites. Approximately 95% of the goods that we purchase for resale are sourced from nationally or globally recognized brands. The private brands products we sell are sourced exclusively through a stringent global supply chain onboarding process.

Major supply agreements are negotiated through our Global Procurement Team or our Global Merchandising Team, under which each of our decentralized business units order the goods supplied to our company operated, CODO and DODO sites. We do not oversee or supply the retail operations of our Licensees. Products in North America are generally supplied to our company operated stores in one of the following ways: our deliveries are either being channeled through distribution centres that we own and operate, acquired from a wholesale supplier or a distributor, or delivered directly to the stores by the manufacturers or distributors. Our Hong Kong operations are supplied exclusively through local procurement agreements negotiated by a dedicated local team.

We buy road transportation fuels from major oil companies, independent refiners and resellers mainly under supply agreements that are negotiated by our Global Fuels team. We resell the fuels to our customers at a profit through our company operated stores, under either one of our brands or the brand names of major oil companies. A tanker truck distribution system supplies our sites with road transportation fuels. Our sites are supplied by trucks owned and operated by ourselves or by external haulers.

We manage most of our operations and workforce using a decentralized model with support and direction from several key global teams. This allows us to speed up decision-making, to address local demand for



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specific products and services, and to optimize corporate overhead. While the implementation of global processes and policies requires careful upstream work to understand decentralized operations and benchmark on our regional practices, we are striving to align on and build global processes to safeguard our complex global and regional supply chains against any form of forced or child labour.

Our Licensees, including Licensee partners operating in countries outside Canada, more specifically in Cambodia, Egypt, Guam, Guatemala, Honduras, Indonesia, Jamaica, Macau, Mexico, Morocco, New Zealand, Saudi Arabia, South Africa, Tanzania, the United Arab Emirates and Vietnam, are operating and managing their supply chain activities independently from ACT.

4. Policies, Governance and Due Diligence processes

4.1 Supplier Code of Conduct

Prior to the end of the Reporting Period, we adopted and launched a global Supplier Code of Conduct allowing us to leverage existing practices across our multiple geographies by consolidating regional supplier-oriented requirements into a global document and aligning our expectations and requirements with all our suppliers, brokers and services providers contributing to our supply chains. The Supplier Code of Conduct applies to all suppliers, vendors, service providers, agents, brokers and manufacturers (collectively, “**Suppliers**”) who (i) manufacture, supply and/or package goods and services for resale and/or goods and services not for resale; or (ii) maintain a business relationship with one or more member of the ACT Group.

While we have communicated the Supplier Code of Conduct to our Suppliers community, we have started and will continue over the next fiscal year to formalize Suppliers engagement as to the terms and requirements we have set out in the Supplier Code of Conduct in our contracts and generally in our terms and conditions of business, thus replacing local supplier-oriented documents on similar matters. The Supplier Code of Conduct includes requirements covering the following general matters:

a. Compliance with Applicable Laws and Legal Requirements:

Whereby Suppliers are required to comply with applicable laws, contractual provisions, and industry standards in the countries in which they do business. When industry standards are more onerous than legal requirements, we expect our Suppliers to comply with the highest standard.

b. Ethical Business Practices:

Suppliers must conduct their business upholding high ethical business practices. More specifically, we require our Suppliers to comply with all applicable anti-bribery, anti-corruption and anti-money laundering laws and regulations, and to not give gifts of cash, cash equivalents or entertainment to our employees and their immediate family members to avoid real or perceived conflicts of interest, undue influence on a business decision or potential intent of bribery.

c. Ethical Employment Standards:

Suppliers are required to adhere to applicable human rights and employment standards. Amongst other requirements, we require our Suppliers to comply with all applicable local laws, statutes and regulations and uphold the more stringent industry standards applicable to their business operations with regards to forced labour and child labour, and to not engage in involuntary labour practices or subject their workers to any form of abuse.



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Our Supplier Code of Conduct specifically includes provisions prohibiting child labour and forced labour:

“Child Labour. As part of the minimum employment and labour standards required by ACT [Group], Suppliers must comply with all applicable local laws, statutes and regulations and uphold the more stringent industry standards applicable to their business operations. The age of Suppliers’ employees needs to be verified prior to employment and a record maintained. Suppliers may only engage workers, employees and contractors that are permitted to work in the jurisdictions in which the Suppliers require them to work. No Supplier may engage any person under the age of 18 if the work in question would (or could reasonably be expected to): (i) be mentally, physically, socially, mentally or morally dangerous to a child; (ii) deprive a child of the opportunity to attend school; (iii) oblige a child to leave school prematurely; (iv) require a child to attempt to combine school attendance with excessively long and heavy work; or (v) otherwise interfere with a child’s schooling. No Supplier may employ any individual below the minimum age permitted by local law. Suppliers must operate in compliance with local laws and the core International Labour Organization standards regarding child labour.

No forced labour, Compensation and Working Hours. Suppliers must not engage in involuntary labour practices, such as forced, bonded, or indentured labour, or subject their works to any other form of physical, mental or sexual abuse. Suppliers are required to ensure that all employees work on a voluntary basis, free from exploitation, discrimination, coercion or any other conditions violating applicable local laws. Suppliers must ensure that workers are provided with written and clear information about their employment conditions in their own language including wages (always meeting or exceeding minimum wage), hours, and vacation before entering into employment. Suppliers must comply with the maximum hours of work per week and ensure that their workers are not penalized for refusing overtime as provided under applicable local laws. Suppliers must ensure that workers (i) are paid regularly and fairly; (ii) are able to leave the workplace at will[;] (iii) retain their documents and work permits[;] and (iv) have the ability to resign from their position subject to reasonable notice. No Supplier may import any goods which have been produced (or are reasonably suspected to have been produced) in whole or in part with modern slavery, including the use of forced labour or child labour.”

d. Environment and Sustainability:

Suppliers are required to comply with all applicable local, regional and/or national environmental laws and regulations and to uphold the highest corporate standards of environmental and sustainable stewardship.

4.2 Code of Ethics and ACT hotline

We have adopted an *Ethics code of conduct* (the “**Code of Ethics**”) which enhances and clarifies our ethical expectations and covers important topics such as integrity, confidentiality, protecting our properties and assets, conflicts of interest, fair treatment of clients, Suppliers, competitors and employees, insider information and insider trading. It is truly meant to be a guide that helps us all make the right decisions. It is now available in a user-friendly and multilingual document. The HRCG Committee reviews the Code of Ethics every year and



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recommends any changes to the Board. A copy of our Code of Ethics is available on our website (corpo.couche-tard.com) and on SEDAR+ (sedarplus.ca).

The Code of Ethics applies to all individuals working for a member of the ACT Group, and we expect consultants, intermediaries, lobbyists and anyone who works on our behalf to comply with the Code of Ethics. Our formal process for communication and ensuring compliance with the Code of Ethics includes:

- giving new employees a copy of the Code of Ethics when they are hired, requiring their signature;
- annual certification of the Code of Ethics, for our non-store employees;
- hosting management information sessions and bi-annual training;
- bi-annual training for our employees delivered in multiple languages;
- requiring everyone to review and acknowledge the Code of Ethics every other year; and
- keeping copies of the Code of Ethics acknowledgments in our records.

Finally, alongside our commitment to enhancing our ethical footprint, and with a view of fostering transparency and accountability, we also made it easier for everyone to report ethical concerns by implementing a new hotline (the “**ACT Hotline**”). The ACT Hotline is a worldwide communication platform, available online at all times and in a multitude of languages to employees and customers everywhere we operate. The ACT Hotline offers an anonymous reporting option and provides tools ensuring transparency and timeliness in the treatment of submitted concerns.

4.3 Whistleblower Policy and Procedures

In addition to the Code of Ethics, we have also adopted a *Whistleblower Policy and Procedures* (the “**Whistleblower Policy**”) which covers accounting and auditing matters, corporate fraud, and internal accounting controls. This policy provides our employees and external stakeholders with communications channels that will allow them to raise concerns in confidence, and anonymously if desired, without fear of reprisals or retaliation of any kinds. The Board’s Audit Committee has the ultimate responsibility for stewardship of the Whistleblower Policy. All directors, officers and employees are required to understand this policy and comply with its terms.

4.4 Human capital management

Our worldwide community of people are at the heart of our business. It is their commitment, safety, motivation and talent that have made us a successful convenience store operator. We strive to foster a culture that will allow our employees to develop and perform to the best of their potential by providing them with the training and development opportunities they need. We also strive to create fair and equal opportunities for success amongst all of our employees while treating everyone with respect and dignity and providing valuable benefits tailored to community needs. We share our best practices through ongoing networking between business units in Canada, the United States, and Europe.

In North America, we created Health, Safety and Environment (“**HSE**”) networks that focus on communication between and among business units which closely resemble established processes in Europe. In this network, team members at multiple levels of operations are empowered to elevate safety-related concerns in addition to the standard case management process, as well as communicate best practices for safe work. Each North American business unit has a Region Operations Director, several market managers, and a team member in each store, all committed to communicating with each other about safe working practices and existing risks.



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Leaders at all levels of the organization are committed to respecting human rights and implementing best practices in HSE welfare, and social responsibility, which is reflected in their day-to-day actions.

5. Measures taken to assess and manage the risks identified in our operations and global and regional supply chains

Consistent with our commitment as a responsible retailer, we engage in ongoing dialogue with each of our key supply chain stakeholders to continuously improve our processes. We are engaging and working with our Suppliers throughout our decentralized operations to promote responsible practices in the areas of the environment, safety, security, governance, and ethics. Among other measures, we have in this respect trained our employees who are on the front lines of interactions with Suppliers in procurement, merchandising, marketing and operations, to mitigate the risks of forced labour and child labour in our global supply chain. We acknowledge our duty and responsibility to use our global influence to fight forced labour and child labour. Nevertheless, all members of the supply chain have a role to play. We therefore hold our Suppliers to high standards and expect them to conduct business in a manner that aligns with our values and corporate governance.

We count on the collaboration between our global and regional supply chain stakeholders to uphold their obligations, including the requirements set out in the Supplier Code of Conduct, to ensure compliance with applicable laws and to prevent risks, including forced labour and child labour. Approximately 95% of the goods that we purchase for resale are sourced from nationally or globally recognized brands, many of which have publicly disclosed the efforts they have made to understand and assess the risks of forced labour and/or child labour in their supply chains and the steps they have taken to reduce those risks. However, there is an inherent risk that our supply chains could be linked to forced labour or child labour through the activities and conduct of these and other entities in our supply chains. For example, some of the raw products used by our Suppliers or by our Suppliers' suppliers in the manufacture of the goods within our supply chain that we purchase for resale may be sourced from countries where there are established risks of forced labour or child labour. We have the ambition to improve our supply chain knowledge to enable us to better identify the risks associated with our supply chains. In addition, to mitigate these risks, we require our Suppliers in our recently launched Supplier Code of Conduct to provide appropriate training to each of their workers, employees, agents, suppliers, and contractors with respect to the matters covered by the Supplier Code of Conduct, which specifically includes provisions prohibiting forced labour and child labour.

Global and Regional Supply Chains

The launch of the Supplier Code of Conduct has been a significant step in helping us align on our ambition with respect to the further implementation of global initiatives and processes aiming to mitigate the risks of forced labour and child labour across our global and regional supply chains. Our growth through significant acquisitions over the past years has led to a variety of regional practices among our supply chain operations.

For instance, our European supply chain and procurement functions have been subject to a more stringent regulatory framework with more centralized regional supply chain processes. Our European procurement and global fuel procurement teams generally follow systematic risk-based compliance processes, which encompass a wide-range of onboarding procedures, KYC verifications, screenings and supplier generated questionnaires to ensure compliance with regulations and regional supplier requirements, including the matters covered by our Supplier Code of Conduct. We have started, as part of the groundwork leading to the launch of our Supplier Code of Conduct, a benchmarking exercise across our operating geographies to identify current practices within the ACT Group with respect to Supplier onboarding due diligence, including the KYC



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processes, risk mapping processes, supplier questionnaires and supplier communications. While operating in a decentralized model, we are leveraging this exercise to align on our ambition to further implement global initiatives and processes that mitigate the risks of forced labour and child labour across our global and regional supply chains, including in North America.

Supplier Code of Conduct

With the launch of our Supplier Code of Conduct prior to the end of our Reporting Period, we are striving to elevate our global requirements and expectations from our Suppliers community. While we have communicated the Supplier Code of Conduct to our Suppliers community, we have started and will continue over the next fiscal year to formalize Supplier engagement as to the terms and requirements we have set out in the Supplier Code of Conduct in our contracts and generally in our terms and conditions of business, thus replacing local supplier-oriented documents on similar matters. The Supplier Code of Conduct, including the following principles on which we aim to anchor the mitigation of the risks of forced labour and child labour across our global and regional supply chains:

a. Supplier Acceptance

By entering into any contract, purchase order or any other terms and conditions with us, Suppliers are expected to comply with the requirements set out in our Supplier Code of Conduct, and to ensure that their respective supply chain, including all suppliers, contractors, sub-contractors, agents and sub-agents uphold the requirements outlined in the Supplier Code of Conduct.

In the event a Supplier fails to comply with our principles and terms set out in our Supplier Code of Conduct, we may require corrective actions depending on the gravity of the non-compliance. If a Supplier fails to collaborate and/or implement satisfactory corrective measures for a material breach of the Supplier Code of Conduct, we could resort to suspending or terminating our business relationship with the Supplier.

b. Training

We require our Suppliers to provide appropriate training to each of their workers, employees, agents, suppliers and contractors with respect to the matters covered by the Supplier Code of Conduct.

c. Oversight of the Board

The HRCG Committee assists the Board in carrying out its responsibilities by dealing with matters relating to ESG, including oversight of any matters covered by this Supplier Code of Conduct.

d. Encouraging Reporting

Our Suppliers are encouraged to speak up and report any actual or suspected suspicious, unlawful or unethical behaviour, including any non-compliance or suspected non-compliance with applicable laws or industry standards, by phone or online through the ACT Hotline platform.

6. Remediation Measures

Our Whistleblower Policy provides ACT Group employees, Suppliers and other external stakeholders with communications channels that allow them to raise concerns in confidence, and anonymously if desired, without fear of reprisals or retaliation of any kind.



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Our Supplier Code of Conduct encourages our Suppliers to speak up and report any actual or suspected suspicious, unlawful or unethical behaviour, including any non-compliance or suspected non-compliance with applicable laws or industry standards, by phone or online through the ACT Hotline platform.

During the Reporting Period, we did not identify nor, to our knowledge, receive any reports of actual or suspected instances of forced labour or child labour in our operations or supply chains. As a result, we have not had to take any measures to remediate any forced labour or child labour or to remediate the loss of income resulting from measures taken to eliminate the use of forced labour or child labour.

7. Training

We have conducted internally developed trainings with respect to familiarization of and adherence to the Act, for those employees, including senior management, who have close involvement with procurement, merchandising or marketing. We also accompanied the launch of our Supplier Code of Conduct with a company-wide training for all our employees who are on the front lines of interactions with Suppliers in procurement, merchandising, marketing and operation functions, as to the requirements and expectations we have set out for our Supplier community in the Supplier Code of Conduct, including with respect to child labour and forced labour, to mitigate the risks of forced labour and child labour in our global and regional supply chains.

8. Assessment of effectiveness

We have introduced certain measures during the Reporting Period as detailed in this report, including the launch of our Supplier Code of Conduct in April 2024, aimed at reducing the risk that forced labour or child labour will be used in our operations and our global and regional supply chains. We have not yet taken any actions to assess the effectiveness of these measures.

9. Approval and attestation

This report was approved by the Board as being a joint report of Alimentation Couche-Tard Inc., Couche-Tard Inc., Mac's Convenience Stores Inc., Circle K Ontario LP, 3326213 Nova Scotia Company and 9121-2738 Québec inc. for the financial year ended April 28, 2024, in accordance with subparagraph 11(4)(b)(i) of the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects, for the purposes of the Act, for the reporting year listed above.

I make the above attestation in my capacity as a director of the Board of Alimentation Couche-Tard Inc. for and on behalf of the Board.

I have the authority to bind Alimentation Couche-Tard Inc.

Brian Hannasch

President and Chief Executive Officer

Director of Alimentation Couche-Tard Inc.

Date: May 17, 2024