

# Fighting Against Forced Labour and Child Labour in Supply Chains Act

Annual Report for BG Fuels Holdings Inc.

## BACKGROUND

In accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act"), BG Fuels Holdings Inc. ("BG Fuels") has prepared the following report (this "Report") disclosing the steps taken by BG Fuels and its applicable subsidiaries over its 2023 financial fiscal year to prevent or reduce the risks of forced labour or child labour in its activities and supply chains. BG Fuels and its applicable subsidiaries are only subject to the reporting requirements in Canada and are not subject to reporting requirements of any other jurisdiction. This is a joint report under the Act for the following reporting entities (the "Reporting Entities"):

- BG Fuels Holdings Inc.
- BCP IV Service Station Limited
- BCP IV Service Station LP
- BCP IV SS Aggregator LP

The information in this report generally applies to all Reporting Entities and is primarily reporting on the activities of BPC IV Service Station Limited, being the only Reporting Entity directly engaged in the sale, and distribution of fuel. In this Report, "we", "us" and "our" means the Reporting Entities collectively.

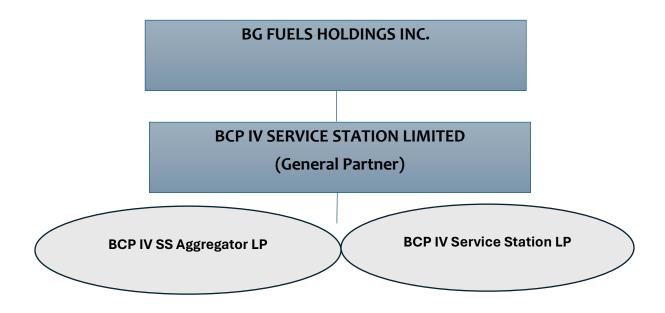
## STRUCTURE, ACTIVITIES, SUPPLY CHAIN

BG Fuels Holdings Inc. is a corporation amalgamated under the laws of Province of Ontario.

BCP IV Service Station Limited is a corporation incorporated under the laws of the Province of Ontario.

BCP IV Service Station LP is a limited partnership formed under the laws of Province of Ontario, by its general partner, BCP IV Service Station Limited.

BCP IV SS Aggregator LP is a limited partnership formed under the laws of the Province of Ontario, by its general partner BCP IV Service Station Limited.





BCP IV Service Station LP, by its general partner, BCP IV Service Station Limited (operating as BG Fuels) owns 242 retail gas stations that are corporately owned, and dealer operated.

The business has two parallel supply chains - one for fuel and one for the convenience store.

Almost the entire supply of gasoline and diesel is purchased through Imperial Oil Ltd across the country. This supply is transported via third party fuel carriers (Seaboard and Westcan) who move the product to the stations on our behalf. The product is then sold the customers.

Convenience store products are purchased from industry leading c-store product suppliers (JTI, RBH, Coke, FritoLay, Nestle, etc) which are transported by Coremark, the largest c-store wholesale distributor.

We've mitigated risk of forced labour and child labour by dealing with large, reputable companies in each link of our supply chain.

## STEPS TAKEN TO PREVENT/REDUCE RISKS OF FORCED LABOUR AND CHILD LABOUR

We have not taken steps to reduce the risk of forced labour or child labour being used at any step in the production and importation of goods in the previous financial year. This information is not available for this reporting period.

### SUPPLEMENTARY INFORMATION ON THE STEPS TAKEN

#### Policies and Due Diligence to Prevent and Reduce the Risk

Our current policy is within our "Fuel Carrier Services Agreement" which outlines that the fuel carrier must comply with all applicable laws, statutes, regulations for anti-slavery and human trafficking.

### Risks of Forced Labour and Child Labour in Activities and Supply Chains

We have reviewed the risks associated with our main supplier, Imperial Oil/ExxonMobil and made use of their Report on Fighting Against Forced And Child Labour in Supply Chains. The risks that have been identified relate to the raw materials or commodities produced and used in the supply chains. However, there are still gaps in our assessment.

#### Measures to Remediate Forced Labour or Child Labour

We have not identified any instances of forced labour or child labour in our activities and supply chains. As such, we have not taken or implemented remediation measures.

Measures to Remediate the Loss of Income



We have not identified any loss of income to vulnerable families resulting from measures taken to address and eliminate the use of forced labour or child labour in our activities and supply chains. As such, we have not undertaken remediation actions related to loss of income to vulnerable families.

### Training Provided to Employees

We do not currently provide our employees training on forced labour or child labour.

#### Assessing Effectiveness

We do not currently have policies, processes, or other actions in place to assess our effectiveness in ensuring that forced labour and child labour is not being used in our activities and supply chains.

### **GOVERNING BODY APPROVAL**

This is a report for BG Fuels Holdings Inc. and its applicable subsidiaries that are Reporting Entities and has been approved by the Board of Directors of BG Fuels Holdings Inc. pursuant to Section 11(4)(b)(ii) 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 the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Date: May 31, 2024

Name: Peter Reiff Title: Chief Financial Officer

*I/we have authority to bind BG Fuels Holdings Inc.*