



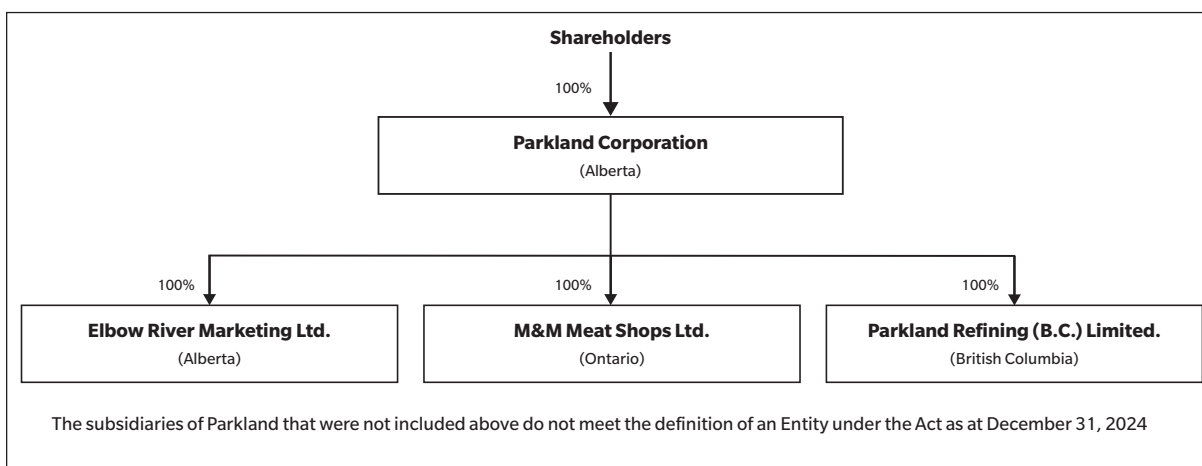
**2024 BILL S-211**

**MODERN SLAVERY REPORT**

## 1.0 INTRODUCTION

This Modern Slavery Report (the Report) has been prepared in accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, SC 2023, c 9 (the Act) that went into effect on January 1, 2024. This Report is prepared for the period of 1 January 2024 to 31 December 2024.

This is a joint report covering the entities in the organizational chart representing intercorporate relationships among Parkland and its material subsidiaries as of December 31, 2024. The report is prepared on behalf of the reporting entities (collectively referred to as Parkland Corporation). The terms “Parkland”, “we”, “our”, and “the Company” refer to Parkland Corporation and extend to all the entities listed in this Report.



## 2.0 COMPANY STRUCTURE, ACTIVITIES AND SUPPLY CHAIN

### 2.1. STRUCTURE AND ACTIVITIES

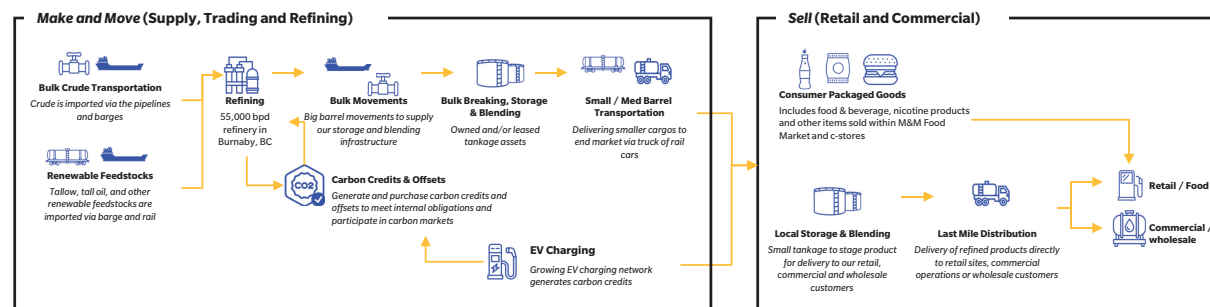
Parkland Corporation is a company incorporated in Canada whose shares are publicly traded on the Toronto Stock Exchange. Exchange (TSX: PKI). Our Canadian headquarters are located at 1800, 240-4 Ave SW, Calgary, Alberta.

Parkland is an international fuel distributor, marketer, and convenience retailer with operations in 26 countries with approximately 4,000 retail and commercial locations across Canada, the United States, and the Caribbean. We serve over one million customers each day. Our retail network meets the fuel and convenience needs, including quality foods, for everyday consumers. Our commercial operations provide businesses with industrial fuels so that they can better serve their customers and provide home heating solutions for residential customers. In addition to meeting our customers’ needs for essential fuels, we provide a range of choices to help them lower their environmental impact. These include renewable fuels sourcing, manufacturing, and blending through our owned and operated Burnaby Refinery in British Columbia, carbon and renewables trading, solar power, and ultra-fast EV charging.

Parkland has over 6,000 employees, with the workforce dispersed across each of the 26 geographies in which we operate.

## 2.2. OUR SUPPLY CHAIN

A summary of Parkland's value chain is outlined in the diagram below:



Operating Segment	Scope of Operations
<b>Supply and Trading</b> <ul style="list-style-type: none"> <li>Crude oil and products supply</li> <li>Truck, rail and marine transport</li> </ul>	<p>We supply our retail and commercial networks and our customers with a wide range of products such as asphalt, fuel oil, crude oil, LPGs and refined low carbon fuels through our fleet comprised of approximately 3000 rail cars and transloaders including utilizing a variety of shipping routes and pipeline access. Our highly experienced trading teams buy and sell energy products throughout our global network and ensure their safe transportation to our customers and our own retail and commercial locations.</p>
<b>Refining</b> <ul style="list-style-type: none"> <li>Major services contractors</li> <li>Asset maintenance</li> <li>Chemicals</li> <li>Safety and personal protective equipment</li> </ul>	<p>We own and operate our Burnaby Refinery which plays a critical role in supplying our customers in British Columbia with the conventional and low-carbon fuels they depend on. Parkland's co-processed fuels have approximately one eighth of the carbon intensity<sup>1</sup> of conventional fuels and can be used in existing vehicles without modification.</p>
<b>Commercial</b> <ul style="list-style-type: none"> <li>Facility maintenance</li> <li>Fuel equipment</li> <li>Environmental services</li> </ul>	<p>We operate 210+ cardlock locations across Canada and the US to provide essential fuels to our trucking customers. We provide our residential customers a range of efficient and cost-effective home heating solutions from essential heating oil and propane and safely delivering it to our customers' homes. We also offer heating equipment, installation, maintenance, service plans and financing. Our commercial business helps our customers responsibly meet their fuel and energy needs including a variety of onsite dispensing and storage options. Our lubricants are designed to meet our customers' needs with a vast array of synthetic and non-synthetic products.</p> <p>Our operating brands include: Bluewave Energy, Island Petroleum, Columbia Fuels, Ultramar, Chevron, Ridgeline, Farstad Oil Inc., Tropic Oil Company, Conrad &amp; Bischoff, Rhinehart Oil, National Fuel Network, Mobil and SOL.</p>
<b>Retail</b> <ul style="list-style-type: none"> <li>Food supply</li> <li>Convenience products</li> <li>Electric vehicle charging equipment</li> </ul>	<p>We supply and market fuel, electric-vehicle charging, convenience and quality food products through a network of more than 4,000 retail locations.</p> <p>Our operating brands include: Ultramar, Chevron, Esso, Fast Gas Plus, Racetrac, Superpumper, Pioneer, SOL Petroleum, On the Run, 59th Street, Cargo, M&amp;M Food Market and Journie Rewards.</p>

<sup>1</sup> Please see [Parkland's Approach to Climate Change](#) for a more detailed explanation on how Parkland uses Life Cycle Analysis to calculate the amount of GHGs generated from extraction to combustion.

## 3.0 POLICIES AND DUE DILIGENCE PROCESSES

### 3.1. OUR POLICY FRAMEWORK

Our policy framework, outlined below, supports Parkland’s ongoing commitment to human rights including prohibiting the use of forced labour and child labour. These policies are located on Parkland’s website [Corporate Governance | Parkland Corporation](#)

Human Rights Policy	Employee Code of Conduct	Sustainability Policy	Supplier Code of Conduct	Whistle Blower Policy
<ul style="list-style-type: none"><li>• Establishes clear standards and expectations for behavior to create an inclusive and equitable work environment</li><li>• Ensures Parkland employees feel respected and protected</li><li>• Demonstrates Parkland’s commitment to social responsibility</li></ul>	<ul style="list-style-type: none"><li>• Establishes the expected standards of behavior and ethics within Parkland.</li><li>• Guides employees on how to interact with colleagues, suppliers, customers, and the public</li><li>• Fosters a positive work culture built on trust and accountability</li></ul>	<ul style="list-style-type: none"><li>• Outlines Parkland’s commitment to protect human rights</li><li>• Sustainability Strategy alignment to United Nations Sustainable Development Goals</li><li>• Responsible growth to ensure we operate sustainability and with integrity</li><li>• Honours our commitments and continuously improve</li></ul>	<ul style="list-style-type: none"><li>• Sets out the minimum standards of behavior and practice that we expect from our suppliers</li><li>• Covers topics such as ethics, integrity, health and safety, and environment</li><li>• Supports maintaining a high level of trust and transparency with our suppliers</li></ul>	<ul style="list-style-type: none"><li>• Fosters transparency, and ethical conduct within Parkland</li><li>• Provides avenue for employees to report misconduct, corruption, or unethical behavior without fear of retaliation</li><li>• Mitigates legal and reputational risks</li></ul>

All Parkland employees are required to comply with our internal policies and our suppliers are required to comply with the Supplier Code of Conduct. Parkland’s commitment to respecting human rights is guided by the rights enshrined in the United Nations (UN) *Universal Declaration of Human Rights* and is informed by other international standards such as the UN *Guiding Principles on Business and Human Rights*.

### 3.2. REPORTING VIOLATIONS

Stakeholders are encouraged to report any questionable conduct through Parkland’s anonymous Ethics and Workplace Employee Hotline (whistleblower hotline). This includes a breach of any Parkland policy and any concern related to potential incidents of forced labour and child labour in our operations or supply chains. This service is available twenty-four hours a day, three hundred and sixty-five days a year. All concerns raised through the whistleblower hotline are appropriately managed in a timely manner.

During 2024, no matters related to forced labour or child labour were reported.

## 4.0 RISK AREAS AND STEPS TAKEN TOWARDS ASSESSMENT AND MITIGATION

### 4.1. RISK AREAS

In our assessment, the inherent risk areas are based on our supply geographies, sectors and products that have an association<sup>2</sup> with forced and child labour as outlined below:

Inherent Risk	Nature of Risk
<b>Personal Protective Equipment / Uniforms</b>	<ul style="list-style-type: none"><li>• Extensive global supply chains can involve multiple tiers of suppliers and sub-contractors that reduce full visibility into the supply chain</li><li>• Difficulty monitoring and regulating labour conditions effectively in regions with weak labour protection laws</li></ul>
<b>Marine Transport</b>	<ul style="list-style-type: none"><li>• Shipping operations are at a higher risk of forced labour</li></ul>
<b>Electric Vehicle (EV) Charging Equipment</b>	<ul style="list-style-type: none"><li>• Mining of raw materials is considered a risk for forced labour in certain geographies</li><li>• High demand for electric and/or battery products, driven by the growing renewable energy and electric vehicle industries intensifies pressure on suppliers to meet production targets, potentially exacerbating labour issues</li></ul>
<b>Tobacco</b>	<ul style="list-style-type: none"><li>• In regions where tobacco is grown, vulnerable populations, including migrant workers may be subjected to exploitative labour</li></ul>
<b>Seafood</b>	<ul style="list-style-type: none"><li>• Labour utilized in seafood processing facilities and fishing operations in certain geographies is at a higher risk of forced labour and child labour</li></ul>
<b>Cocoa</b>	<ul style="list-style-type: none"><li>• The cocoa industry is considered a higher risk for child labour</li></ul>

### 4.2. ASSESSMENT AND MITIGATION

To address the risks of forced labour and child labour within our operations and supply chain, we conducted a targeted risk mapping of our suppliers operating in regions and industries with heightened exposure to forced and child labour. This assessment allowed us to identify suppliers in the inherent risk areas above and prioritize them for further engagement and oversight. These suppliers were included in our 2024 Forced Labour and Child Labour Survey, which was designed to deepen our understanding of their supply chains, operational processes, and the mechanisms they have in place to identify and mitigate forced and child labour risks within their operations.

To strengthen our approach, we introduced Supplier Relationship Management (SRM) practices in August 2024 to enhance collaboration and monitoring of at-risk suppliers. Parkland's SRM practices enable us to build stronger partnerships with our suppliers and ensure their alignment with our ethical standards and human rights commitments.

These measures represent a proactive and robust approach to assessing and mitigating forced and child labour risks across our supply chain.

## 5.0 STEPS TAKEN IN 2024 TO PREVENT AND REDUCE RISK

### 5.1. SUPPLY CHAIN

In 2024, we expanded on the enterprise-wide risk assessment of our supply chain and operations that was conducted in 2023 to assist in identifying areas of elevated risk of forced labour and child labour. We also developed and issued a survey to suppliers with one or more high-risk factors (i.e., industry, product, or geography) to gain a better understanding of how

<sup>2</sup> [Global Slavery Index | Walk Free](#)

forced labour and child labour risks are identified and mitigated within their operations. The survey questionnaire covered risk exposure to and incidents of child and forced labour, existing policies and training programs related to child and forced labour, and other relevant general information (including how child and forced labour shows up within their own tier one suppliers and supply chains).

The survey resulted in an overall low risk to Parkland with our tier one suppliers. Despite the overall lower risk, we identified and followed-up on the two areas that came up in our residual risk assessment:

- suppliers that highlighted potential risk within their own supply chains based on the geography and the classification of products their suppliers' manufacture.
- Suppliers that have opportunities to improve their internal governance to identify and mitigate forced labour and child labour risks in their supply chains more proactively.

To further prevent and reduce the risk of forced labour and child labour within our supply chain, we implemented a supplier pre-qualification process as part of our sourcing activities. This process includes a detailed questionnaire embedded in all outgoing requests for proposals and quotations. The questionnaire is designed to assess prospective suppliers' policies, practices, and controls related to forced and child labour, ensuring that ethical standards are upheld before entering into any business relationships. This proactive measure will enable us to identify and address potential risks early in the procurement process.

## 5.2. OPERATIONS

Within our own operations, we investigated whether there were any instances of child labour by conducting an age-based assessment in each geography to identify direct labour under the legal working age. This assessment was further refined to identify those employees in each age category, the exact jurisdiction of employment, the nature of employment (i.e., part time or full time) and the work performed.

The results of assessing our workforce confirmed that there were no instances of child labour within Parkland and in our operations. Furthermore, in addition to forced labour and child labour being strictly prohibited by our Human Rights Policy, Parkland's hiring policies and practices help reduce the risk of child labour within our operations going forward:

- We continue to ensure that employment of individuals is in full adherence with local labour laws.
- Age and work eligibility criteria are also continuously vetted through our recruitment process to ensure local labour laws are adhered to and that background screening processes capture both age and eligibility-to-work to ensure that we are meeting appropriate age requirements.

## 6.0 MEASURES TO REMEDIATE FORCED LABOUR OR CHILD LABOUR

Our 2024 assessment did not reveal any incident of forced labour or child labour within our operations, and we did not receive any information through our 2024 supplier survey requiring any remediation.

We continue to recognize the importance of on-going due diligence to ensure that the suppliers we work with are adopting appropriate internal controls to mitigate the risk of forced labour and child labour both within their operations and through the lower-level tiers in their supply chain.

## 7.0 MEASURES TO REMEDIATE LOSS OF INCOME

Measures to remediate loss of income were not required in 2024 as the assessment did not identify any incidents of forced or child labour. We recognize the importance of addressing instances of forced and child labour in our supply chain as they are identified through our due diligence process, as well as the importance of remediating any loss of income to the most vulnerable affected families.

## TRAINING PROVIDED TO EMPLOYEES

As part of our efforts to enhance employee awareness and build capacity to address forced labour and child risks, the following actions were taken in 2024:

Focus Area	Key Actions
Employee Awareness	<ul style="list-style-type: none"><li>All-employee communication bulletin via our internal company-wide communication channels.</li><li>Information session on forced labour and child labour provided to Supply Chain employees.</li></ul>
Employee Training	<ul style="list-style-type: none"><li>Developed a training course on modern slavery awareness with particular emphasis on forced labour and child labour, and incorporated it as a mandatory course within our Learning Management System.</li><li>The course was first rolled out to all executive and senior leaders at Parkland to set an appropriate tone from the top. Implementation of the course has continued in early 2025 with key support functions throughout the organization to ensure organizational alignment and accountability. Training for Parkland employees will continue throughout 2025.</li><li>An update was also made to new employee onboarding materials to ensure that new hires are informed from the outset.</li></ul>

## 8.0 ASSESSMENT OF EFFECTIVENESS

### 8.1. ASSESSMENT OF EFFECTIVENESS

We remain vigilant in our efforts to maintain the integrity and transparency of our operations and we continue to implement robust measures to prevent and address potential risks in line with our values.

A subset of Parkland's Modern Slavery Taskforce convenes regularly to evaluate the effectiveness of these measures. Key actions and opportunities for improvement are identified to ensure an effective framework for assessing and mitigating forced and child labour risks within our supply chain.

### 8.2. CONTINUOUS IMPROVEMENT

Parkland continues to focus on the following actions as we work to further operationalize and build the maturity to mitigate the risk of forced labour and child labour in our operations and supply chain:

Focus Area	Key Actions
Governance	<ul style="list-style-type: none"><li>Assess residual risk to determine scope of follow-up reviews.</li><li>Leverage external reporting data insights for geographic and product related risk factors.</li></ul>
Continued Contract Efforts	<ul style="list-style-type: none"><li>Vigilance with supplier contract forms to reflect our commitment to fighting against forced labour and child labour.</li></ul>
Increased Supplier Engagement	<ul style="list-style-type: none"><li>Continued due diligence with our supplier survey and screening questionnaires on forced labour and child labour.</li><li>Introduced a comprehensive forced labour and child labour questionnaire into sourcing templates for all outgoing requests for proposals and requests for quotations.</li><li>Implementation of Supplier Relationship Management which enables improved collaboration with our suppliers and ensure their continuous alignment with our ethical standards and human rights commitments.</li></ul>
Training	<ul style="list-style-type: none"><li>Periodic review and improvement of existing training materials and communication of key legislative and regulatory development to relevant stakeholders within the organization</li></ul>

## 9.0 REPORT APPROVAL AND ATTESTATION

This Report was approved pursuant to subparagraph 11(4)(b)(ii) of the Act by the Board of Parkland Corporation on its own behalf and on behalf of all other reporting entities included herein.

In accordance with the requirements of the Act, I attest that I have reviewed the information contained in this Report for the entities listed in this Report. 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 2024 reporting year. For clarity, I am providing this attestation in my capacity as a director and officer of Parkland Corporation, and not in my personal capacity.

A handwritten signature in dark ink, appearing to read 'MJ', is written over a horizontal line.

Michael Jennings

Director, Chair of the Board and Environment, Safety and Sustainability Committee  
Parkland Corporation

I have the authority to bind Parkland Corporation.

### Forward-Looking Information

This Report contains forward-looking information and statements (collectively, “forward-looking statements”) based on Parkland’s current expectations, estimates, projections, and assumptions. In particular, this Report contains forward-looking statements with respect to, among other things: Parkland’s commitments and priorities regarding sustainable development and human rights; and our plans and initiatives relating to prevention and mitigation of risks of forced labour and child labour in our operations and supply chain, and the timing thereof. Forward-looking statements involve known and unknown risks, and actual results may differ materially from those expressed or implied by such statements. No assurance can be given that these expectations will prove to be correct and such forward-looking statements included in this Report should not be unduly relied upon. See “Cautionary Statement Regarding Forward-Looking Information” and “Risk Factors” included in Parkland’s current Annual Information Form (“**AIF**”), and “Forward-Looking Information” and “Risk Factors” in Parkland’s Management’s Discussion and Analysis (“**MD&A**”) for the most recently completed financial period, which are incorporated by reference herein, for more information about the assumptions and risks with respect to the forward-looking statements in this Report. Each of the AIF and the MD&A are filed on the SEDAR+ at [www.sedarplus.ca](http://www.sedarplus.ca) and available on the Parkland website at [www.parkland.ca](http://www.parkland.ca). The forward-looking statements contained in this Report are expressly qualified by this cautionary statement and are made only as of the date of this Report. Parkland does not undertake any obligation to publicly update or revise the forward-looking statements contained in this document, except as required by law.