



Parkland

**2025 BILL S-211
MODERN SLAVERY REPORT**

1.0 INTRODUCTION

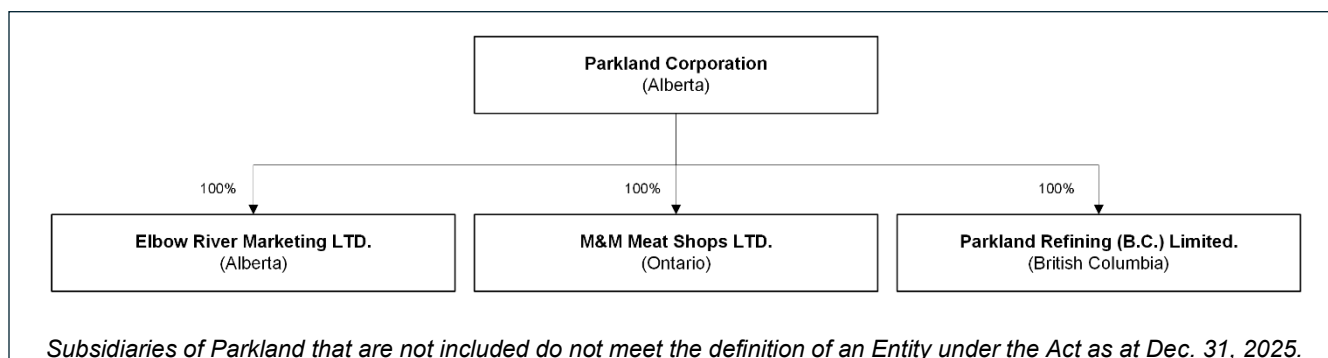
This Modern Slavery Report (the Report) has been prepared in accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c 9 (the Act). This Report is prepared for the period from January 1, 2025, to December 31, 2025.

This Report is filed on behalf of Parkland Corporation and its material subsidiaries as of December 31, 2025 (collectively referred to as the “Company”). References to “Parkland”, “we”, “our”, or the “Company” are limited to these entities unless otherwise stated.

On November 1, 2025, Sunoco LP completed the acquisition of Parkland Corporation. Sunoco LP does not qualify as an entity under the Act for the reporting period of this report.

Given the timing of the acquisition and the integration activities undertaken during 2025, the Company has prioritized continuity of its existing approach to addressing risks of forced labour and child labour. This includes leveraging established processes implemented in prior years, alongside continued focus on training, awareness, and the consistent application of governance and due diligence practices across the organization.

The organizational chart below presents the corporate structure of Parkland and its subsidiaries which meet the definition of an Entity under the Act as of December 31, 2025. It is provided for context only.



2.0 COMPANY STRUCTURE, ACTIVITIES AND SUPPLY CHAIN

2.1. STRUCTURE AND ACTIVITIES

Until November 1, 2025, Parkland Corporation was a Canadian publicly traded company listed on the Toronto Stock Exchange (TSX: PKI). As of November 1, 2025, Parkland Corporation is a subsidiary of Sunoco LP, a U.S. publicly traded master limited partnership listed on the New York Stock Exchange (NYSE: SUN). Parkland Corporation’s head office is located at 1800, 240 – 4 Avenue SW, Calgary, Alberta.

Parkland is a fuel distributor, marketer, and convenience retailer with operations in 26 countries and 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, convenience, and quality food needs of 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.

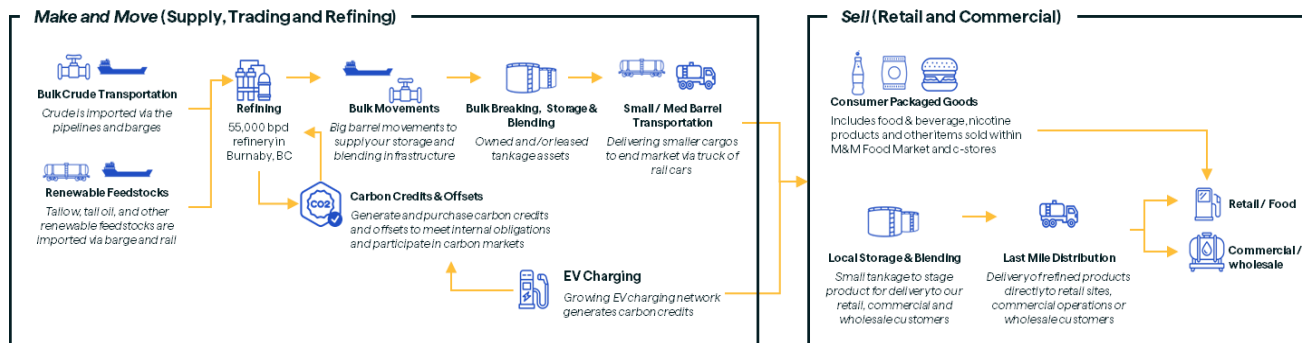
In addition to meeting our customers’ needs for essential fuels, we provide a range of choices to help them lower their environmental impact. These include renewable fuels sourcing, manufacturing, and

blending through our owned and operated Burnaby Refinery in British Columbia, carbon and renewables trading, solar power, and ultra-fast EV charging.

Parkland had over 6,000 employees in 2025, 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 in 2025 is outlined in the diagram below.



| Operating Segment | Scope of Operations |
|--|--|
| Supply and Trading <ul style="list-style-type: none"> Crude oil and products supply Truck, rail and marine transport | 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. |
| Refining <ul style="list-style-type: none"> Major services contractors Asset maintenance Chemicals Safety and personal protective equipment | 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 products fuels have approximately one eighth of the carbon intensity ¹ of conventional fuels and can be used in existing vehicles without modification. |

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

Commercial

- Facility maintenance
- Fuel equipment
- Environmental services

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 deliver 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.

Our operating brands in 2025 included: Bluewave Energy, Island Petroleum, Columbia Fuels, Ultramar, Chevron, Ridgeline, Farstad Oil Inc., Tropic Oil Company, Conrad & Bischoff, Rhinehart Oil, National Fuel Network, Mobil, and SOL.

Retail

- Food supply
- Convenience products
- Electric vehicle charging equipment

We supply and market fuel, electric-vehicle charging, convenience and quality food products through a network of more than 4,000 retail locations.

Our operating brands in 2025 included: Ultramar, Chevron, Esso, Fast Gas Plus, Racetrac, Superpumper, Pioneer, SOL Petroleum, On the Run, 59th Street, Cargo, M&M Food Market, and Journie Rewards.

3.0 POLICIES AND DUE DILIGENCE PROCESSES

3.1. OUR POLICY FRAMEWORK

The policy framework outlined below supported Parkland's commitment in 2025 to human rights, including prohibiting the use of forced labour and child labour.

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

All Parkland employees were required to comply with our internal policies. Suppliers were 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 2025, 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, inherent risk areas are based on our supply geographies, industry sectors, and products that have an association² with forced and child labour as outlined below:

| Inherent Risk | Nature of Risk |
|---|---|
| Personal Protective Equipment / Uniforms | <ul style="list-style-type: none">• Extensive global supply chains can involve multiple tiers of suppliers and sub-contractors that reduce full visibility into the supply chain• Difficulty monitoring and regulating labour conditions effectively in regions with weak labour protection laws |
| Marine Transport | <ul style="list-style-type: none">• Shipping operations are at a higher risk of forced labour |
| Electric Vehicle (EV) Charging Equipment | <ul style="list-style-type: none">• Mining of raw materials is considered a risk for forced labour in certain geographies• 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 |
| Tobacco | <ul style="list-style-type: none">• In regions where tobacco is grown, vulnerable populations, including migrant workers may be subjected to exploitative labour |
| Seafood | <ul style="list-style-type: none">• Labour utilized in seafood processing facilities and fishing operations in certain geographies is at a higher risk of forced labour and child labour |
| Cocoa | <ul style="list-style-type: none">• The cocoa industry is considered a higher risk for child labour |
| Coffee | <ul style="list-style-type: none">• Coffee farming in certain geographies relies on seasonal and migrant labour, increasing the risk of forced labour and child labour |

4.2. ASSESSMENT AND MITIGATION

To address the risks of forced labour and child labour within our operations and supply chain, Parkland conducted a targeted risk mapping of suppliers operating in regions and industries with heightened exposure to such risks. This assessment enabled the identification of higher inherent risk suppliers and informed prioritization for further engagement and oversight. These suppliers were included in our Forced Labour and Child Labour Survey, designed to deepen our understanding of

² [Global Slavery Index | Walk Free](#)

their supply chains, operational processes, and the mechanisms in place to identify and mitigate these risks.

These measures reflect our continued proactive approach to assessing and mitigating forced labour and child labour risks across Parkland’s supply chain.

Parkland expects to undertake a refreshed risk mapping exercise in 2026 to reflect our evolving operating environment, supplier base, and procurement processes. This work will continue to focus on Parkland entities and will inform our ongoing due diligence, prioritization, and engagement activities, supporting continuous improvement in our approach to identifying and mitigating modern slavery risks across the supply chain.

5.0 STEPS TAKEN IN 2025 TO PREVENT AND REDUCE RISK

5.1. SUPPLY CHAIN

For the 2025 reporting year, we re-issued a survey to our suppliers who had one or more high-risk factors (i.e., industry, product, geography) identified through our risk assessment or who had not previously responded to our survey. 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 results demonstrated an overall low risk to Parkland with our tier-one suppliers and no incidents of forced or child labour were identified.

5.2. OPERATIONS

Within our own operations, we continually monitor any risk of child labour by implementing controls in each geography to identify labour under the legal working age. These controls ensure we 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.

Our workforce assessment confirmed that there were no instances of child labour within Parkland operations in 2025. Furthermore, in addition to forced labour and child labour being strictly prohibited by our Human Rights Policy, Parkland’s hiring policies and practices further mitigated the risk of child labour within our operations by:

- Ensuring that employment of individuals is in full adherence with local labour laws; and
- Vetting age and work eligibility criteria through our background screening processes which capture both age and eligibility-to-work to ensure that we are meeting appropriate age requirements.

5.3. TRAINING PROVIDED TO EMPLOYEES

As part of our efforts to enhance employee awareness and build capacity to address forced and child labour risks, the following actions were taken in 2025:

| Focus Area | Key Actions |
|-------------------|--------------------|
|-------------------|--------------------|

| | |
|---------------------------|--|
| Employee Awareness | <ul style="list-style-type: none"> Company-wide communication distributed through internal channels to reinforce awareness of forced and child labour risks. |
| Employee Training | <ul style="list-style-type: none"> Modern Slavery Awareness training deployed to all Parkland employees, with completion tracked through the Learning Management System to support alignment and accountability. Onboarding materials updated to ensure new hires are informed and required to complete the training Mandatory training on the Code of Conduct and Anti-Bribery and Anti-Corruption Policies. |

6.0 MEASURES TO REMEDIATE FORCED LABOUR OR CHILD LABOUR

As of the date of this report, our 2025 assessment did not reveal any incident of forced labour or child labour within our operations, and we did not receive any information through our 2025 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 2025 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.

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 continue to implement measures intended to prevent, identify, and address forced labour and child labour risks in line with our values and expectations.

8.2. CONTINUOUS IMPROVEMENT

Parkland continues to focus on the following actions 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"> Assess residual risk to determine scope of follow-up reviews Leverage external reporting data insights for geographic and product related risk factors |
| Continued Contract Efforts | <ul style="list-style-type: none"> Update supplier contract forms to reflect our commitment to fighting against forced labour and child labour |

Increased Supplier Engagement

- Continue due diligence with our supplier survey and screening questionnaires on forced labour and child labour

Training

- Periodic review and improvement of existing training materials and communication of key legislative and regulatory development to relevant stakeholders within the organization
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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 2025 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.



Shelley Girard
Director of the Board
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. 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.