

Core-Mark International, Inc.

2023 Report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

This is the first report for Core-Mark International, Inc. (Core-Mark) under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the Act).

Core-Mark is an entity within the meaning of section 2 of the Act and that is required to Report within section 9 of the Act.

This report to the Minister of Public Safety and Emergency Preparedness (Minister) describes the steps that Core-Mark has taken in the last year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods imported into Canada by Core-Mark.

Structure, Activities and Supply Chains

Core-Mark is a marketer of fresh, food, and broadline supply solutions to the convenience retail industry. Core-Mark is one of the largest foodservice and wholesaler consumer products distributors in the convenience retail industry. Core-Mark offers a full range of products, marketing programs and technology solutions to approximately 50,000 customer locations in the United States and Canada. Core-Mark's customers include traditional convenience stores, drug stores, mass merchants, grocery stores, liquor stores and other specialty and small format stores that carry convenience products. Core-Mark's product offering includes cigarettes, other tobacco products, alternative nicotine products, candy, snacks, food, including fresh products, groceries, dairy, bread, beverages, general merchandise and health and beauty care products.

Policies and Due Diligence Processes

Core-Mark conducts its businesses according to the policies and due diligence processes in place at our parent company, Performance Food Group, Inc. (PFG¹), of which Core-Mark is a wholly-owned subsidiary. Core-Mark is headquartered in Dallas, Texas, and is incorporated in Delaware, USA. Core-Mark has over 700 employees located in Canada at the following locations:

- Milton, Ontario;
- Winnipeg, Manitoba;
- Calgary, Alberta; and
- Vancouver, British Columbia.

Code of Business Conduct

PFG's *Code of Business Conduct*² (Code) is a public statement of the organization's high standards and applies to all PFG officers, directors and employees (associates).

Under the Code, associates must honor human rights everywhere they operate, and must remember that PFG prohibits the use of all forms of forced labor, human trafficking and physical punishment

¹ Performance Food Group, Inc. is a wholly-owned subsidiary of Performance Food Group Company.

² https://s22.q4cdn.com/140600076/files/doc_downloads/governance_doc/2023/pfg_coc_final_ext_060823.pdf

or abuse. PFG also protect the rights of children, through its policy to comply with child labor laws and not hire anyone under the age of 18³.

Under the Code, associates are also expected to exercise due diligence when recruiting for PFG since PFG prohibits working with anyone who violates employment laws or engages in human rights abuses. The Code requires associates to select new hires or business partners “who agree to uphold [PFG’s] standards, monitor them closely and take corrective action when needed.”⁴

The Code applies to anyone who works for PFG, including contractors. Tier 1 suppliers, vendors and other business partners are expected to share the spirit of the Code and uphold PFG’s *Business Partner Code of Conduct* (discussed below). Associates are encouraged to report any suspected violations of the Code, including anonymously through a third-party provider, and the Code specifically notes that retaliation for reporting is itself a violation of the Code. Violations of the Code can lead to serious consequences and disciplinary action for anyone involved, up to and including termination of employment.

Enterprise Human Rights Policy

PFG’s *Enterprise Human Rights Policy*⁵ (Human Rights Policy) was developed guided by the content of the *Universal Declaration of Human Rights*, in accordance with United Nations (UN) *Guiding Principles on Business and Human Rights*.

The Human Rights Policy applies to PFG, its divisions and warehouse operations, and areas in which PFG has direct influence. PFG expects all business partners to share its commitment to the principles laid out in the Human Rights Policy and urges them to implement systems and processes to operationalize those concepts.

The Human Rights Policy states:

“We prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking.

We prohibit the hiring of individuals under 18 years of age in jurisdictions with policies for employment of minors or for positions in which hazardous work is performed.”

Associates with questions or concerns about the Human Rights Policy are encouraged to raise those concerns, including through the anonymous reporting tool. PFG also reports publicly on its efforts to implement its Human Rights Policy through its annual Environmental, Social and Governance (ESG) report.⁶

Business Partner Code of Conduct

³ Core-Mark’s Iowa division hires workers that are under 18 during the summer months to assist with picking and packing at our Iowa warehouse in accordance with all applicable laws.

⁴ *Ibid.*, p. 49.

⁵ [https://s22.q4cdn.com/140600076/files/doc_downloads/governance_doc/2020/06/PFG-Enterprise-Human-Rights-Policy-\(12-May-2020\).pdf](https://s22.q4cdn.com/140600076/files/doc_downloads/governance_doc/2020/06/PFG-Enterprise-Human-Rights-Policy-(12-May-2020).pdf).

⁶ The 2022 Environmental, Social and Governance (ESG) Report is available at https://pfgc.com/-/media/PFGC/Files/ESG_CSR-Report-2022_Final.pdf.

PFG has a *Business Partner Code of Conduct*⁷ (Business Partner Code) that defines PFG's expectations of its business partners (which includes Tier 1 Suppliers, distributors, and all other third parties). Acceptance of and adherence to the Business Partner Code is mandatory for all business partners and is understood to be confirmed by the business partner's agreement to undertake business with PFG.

Under the Business Partner Code, PFG reserves the right to conduct integrity screening of business partners, as part of its selection process, and reserves the right to prioritize working with business partners that have established ESG goals, and are aligned with PFG's own ESG goals.

For purposes of this report, the key part of the Business Partner Code is as follows:

“We expect all Business Partners to be fair, transparent, and respectful in the treatment of their employees, and expect them to hold their other business partners to these standards as well. We expect all Business Partners, subcontractors, and affiliated entities to adhere to the following key conventions of the International Labor Organization and United Nations Declaration of Human Rights:

- Prohibit child labor, forced, or compulsory labor and human trafficking
- Ensure compliance with applicable age, hours, and benefits laws, including minimum wage, overtime, and maximum work week laws
- Verify the employment eligibility of employees”

The Business Partner Code provides that PFG reserves the right to audit compliance and ensure verification of stated claims: “We will monitor and enforce this Code through a variety of audits if deemed necessary by PFG's risk management processes, including third-party verification, access to facilities and relevant records, and any additional monitoring and enforcement measures PFG deems necessary on a case-by-case basis.”

The Business Partner Code promotes and encourages all business partners to uphold the same standards and compliance measures when working with their other business partners and utilization of subcontractors.

PFG reserves the right under the Business Partner Code to terminate the relationship due to a lack of goodwill, lack of adequate performance in these areas, or lack of risk management capacity and capabilities. PFG will assess violations of the Business Partner Code on a case-by-case basis and is committed to collaborating with all business partners to ensure expectations are set, internal controls are established, and mutual accountability for desired outcomes is upheld. PFG reserves the right to terminate the relationship with any business partner that knowingly obstructs the Business Partner Code.

Business partners are encouraged to report concerns, including confidentially through the anonymous reporting tool.

⁷ [https://s22.q4cdn.com/140600076/files/doc_downloads/governance_doc/2020/05/PFG-Supplier-Code-of-Conduct-\(8Apr2020\).pdf](https://s22.q4cdn.com/140600076/files/doc_downloads/governance_doc/2020/05/PFG-Supplier-Code-of-Conduct-(8Apr2020).pdf).

Assessing Forced Labour and Child Labour Risks

PFG is assessing the risk of forced labour or child labour being used in its business and supply chains through (1) annual ESG Tier 1 supplier surveys (Supplier Survey), (2) assessing the market-specific risk, including geographical, risk of its suppliers, (3) regularly monitoring social media and other online information platforms, and (4) conducting supplier intelligence interviews.

With respect to forced labour and child labour, the Supplier Survey assesses supplier commitment and comprehensiveness in systematically ensuring human rights are protected and labour is managed ethically and in compliance with the UN Global Compact and the International Labor Organization.

Tier 1 suppliers (many of whom are very large, multi-national companies that have their own comprehensive reporting and diligence requirements for labour practices) are asked to confirm, with documentation, whether they:

- have formal policies on human rights;
- have processes in place to validate age, date of birth, and legal status to work;
- have employment contracts that contain all elements as required by local laws;
- provide equal pay for equal work, regardless of gender, ethnic origin, race, caste, tribe, sexual orientation, or religious beliefs;
- have mechanisms in place to evaluate and address risks of modern slavery;
- have performed an audit of adherence to established policies;
- have had an objective third-party audit of adherence to established policies.

The initial Supplier Survey focused on PFG's branded suppliers (i.e., suppliers that pack PFG proprietary brands) and our largest suppliers (including candy and snack manufacturers, beverage companies, fresh food manufacturers, and others), and there were no forced labour or child labour related risks identified.

PFG's financial year 2023 survey focused on its larger, national vendor partners. The results of this survey are expected to be released sometime in calendar year 2024.

Core-Mark intends to incorporate the Supplier Survey as a requirement in PFG's request for proposal (RFP) procurement process in the future.

Remediation Measures

No material forced labour or child labour related risks were identified for 2023 and therefore, no measures have been taken to remediate forced labour or child labour or any related loss of income in our activities and supply chains.

Training

All associates and board members receive training on the PFG Code of Conduct.

PFG provides role-specific training to associates on human rights and how to recognize, mitigate, and act on violations that reinforces commitment to PFG Enterprise Human Rights Policy.

PFG rolled out new training on forced labour and child labour in its US operations. Going forward Canadian employees will receive this training.

Assessing effectiveness

PFG assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains through engaging with its peers and industry associations on the due diligence processes, by conducting supplier interviews to assess the issues they are experiencing to assist Core-Mark in tailoring its due diligence processes, and by adopting the principles of continual improvement.

Approval of Report

This report has been approved by Core-Mark's board of directors body pursuant to paragraph (4)(a) of the Act.

Attestation of Report

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.

Full name: Christopher Hobson

Title: President and Chief Executive Officer of Core-Mark International, Inc.

Date: 5/15/2024

Signature:



I have the authority to bind Core-Mark International, Inc.