



Chick-fil-A Canada Supply Chains Act Report

CHICK-FIL-A CANADA ULC

Report Prepared Pursuant to

Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act

1. Introduction and Identity

This Report is produced by Chick-fil-A Canada ULC (collectively, "CFAC.", "our", "us" and "we") for the financial reporting year ended December 31, 2025 (the "Reporting Period") and sets out the steps taken during the Reporting Period to prevent and reduce the risk that forced labour and child labour was used at any step in the production of goods in Canada or elsewhere or the production of goods imported into Canada. CFAC is a wholly-owned indirect subsidiary of Chick-fil-A, Inc. ("CFA" and is referred to together with its subsidiaries as the "CFA Group").

This Report has been prepared and filed by CFAC pursuant to Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act").

2. Steps Taken During the Reporting Period to Prevent and Reduce Risks of Forced Labour and Child Labour in its Supply Chains

During the Reporting Period, CFAC and CFA have taken steps, as set out in this Report, to prevent and reduce risks of forced labour and child labour in CFAC's supply chains including entering into written agreements with suppliers and distributors (collectively "Vendors") whereby Vendors agree to abide by CFA's Vendor Code of Conduct.

3. Structure, Activities and Supply Chains

As of December 31, 2025, CFAC maintained a growing presence in Canada with 28 branded restaurants operating across Alberta and Ontario. Such branded restaurants include both company operated and franchised restaurants. CFAC is supported by a dedicated workforce of 12 corporate employees.

Incorporated on September 19, 2017, as a British Columbia unlimited liability company, CFAC offers franchises and licenses for the development of a system of retail quick-service restaurants in Canada under the trademark "Chick-fil-A" specializing in a boneless breast of chicken sandwich.

As a member of the CFA Group, CFAC operates under the global standards of CFA, the third-largest quick-service restaurant company in the United States by total sales. CFA is renowned for its freshly prepared food and a unique franchise model where local Owner-Operators live and work in the communities they serve. To maintain consistency and ethical standards across more than 3,000 locations in the United States, Canada, Puerto Rico, the UK, and Singapore, CFA develops and implements comprehensive group policies and procedures that are followed by all group entities, including CFAC.



Chick-fil-A Canada Supply Chains Act Report

A critical component of this governance is the CFA Vendor Code of Conduct, which CFAC implements to ensure integrity throughout its supply chain. CFAC sources over 95% of its goods from Canada and the United States, supplemented by items from other jurisdictions. When the CFA Group enters into strategic agreements with Vendors who manage the manufacture, importation and sale of goods to local Owner-Operators, these agreements mandate that Vendors adhere to the CFA Vendor Code of Conduct or equivalent, ensuring that the brand's commitment to responsible sourcing is upheld as CFAC continues to expand its footprint. In addition, CFAC imports restaurant equipment from the United States into the Canadian market.

4. Policies and Due Diligence Processes

The CFA Group is committed to conducting all business matters with the highest ethical standards and with a steadfast commitment to comply with all applicable laws.

At CFA, we firmly believe in upholding honesty and integrity, which are foundational to a healthy, thriving business. To ensure clarity and a shared commitment to these principles, Staff are expected to communicate truthfully and transparently, exhibiting honesty and integrity in all work-related interactions. Commitment to these principles strengthens our brand and promotes the health of Chick-fil-A for years to come.

The CFA Group Vendor Code of Conduct generally applies to Vendors who supply goods or services to the CFA Group. Further, Vendors are responsible for ensuring that their own suppliers and contractors including those who grow, produce, or supply raw materials for or components of a finished product or service, adhere to the CFA Group Vendor Code of Conduct.

The CFA Group Vendor Code of Conduct establishes rigorous standards for Vendors providing goods and services to the CFA Group, extending these requirements to their own suppliers and sub-suppliers throughout the supply chain. Central to this policy is the mandate that Vendors comply with all applicable local, national, and international laws, including those governing employment standards, human rights, and environmental responsibility. By emphasizing business integrity, the Vendor Code of Conduct requires that entities providing goods to the CFA Group operate with a commitment to treating workers with honor, dignity, and respect and the CFA Group extends this principle to its Vendors and their employees and suppliers and sub-suppliers.

Employment standards within the Vendor Code of Conduct strictly prohibit any form of involuntary or child labour, including forced, bonded, or slave labour, as well as human trafficking and the exploitation of workers. Vendors must ensure that all employees meet the legal age requirements for their jurisdiction and are protected from work that jeopardizes their health or safety. Furthermore, the Vendor Code of Conduct mandates compliance with all applicable wage and hour laws, respects the freedom of association, and maintains a zero-tolerance policy toward any form of physical, psychological, or verbal harassment and all forms of illegal discrimination.

To ensure a safe workplace, Vendors are required to take necessary steps to prevent accidents and minimize health risks, providing sanitary conditions for both work and residential facilities. CFA enforces these standards by reserving the right to conduct unannounced audits of Vendor practices



Chick-fil-A Canada Supply Chains Act Report

and facilities. Failure to adhere to these standards or a failure to monitor the supply chain effectively may result in the termination of the business relationship, reinforcing CFA's commitment to ethical sourcing and corporate accountability.

Beyond the formal requirements of CFA's Vendor Code of Conduct, the CFA Group prioritizes the cultivation of long-term relationships with its Vendors. These enduring partnerships allow for a deeper understanding of Vendor operations and the internal business cultures of the organizations within the supply chain. By fostering open communication and mutual trust over time, CFAC enhances its ability to identify potential non-compliant actions and proactively address risks, including risks of forced and child labour, ensuring a more resilient and ethical supply chain.

The majority of goods and supplies purchased by local Owner-Operators are sourced directly from these approved Vendors. By centralizing the procurement process through a network of trusted partners who are contractually bound to CFA's Vendor Code of Conduct, CFAC ensures that the essential ingredients, packaging, and equipment used in daily restaurant operations consistently meet the brand's high standards for quality and ethical integrity.

5. Forced Labour and Child Labour Risks and Steps Taken to Assess and Manage These Risks

CFAC is aware that labour risk varies in certain industries and geographies globally. Over 95% of its goods come from Canada and the United States.

The CFA Group expects its Vendors to comply with all applicable laws, rules, and regulations at the local, state, federal, national and international levels, including laws relating to employment standards, workplace environment, business integrity, and environmental and social responsibility. The CFA Group Vendor Code of Conduct outlines the CFA Group's expectations of fair and ethical business practices for all Vendors. Vendors who knowingly or repeatedly violate the Vendor Code of Conduct or applicable laws, or who provide goods or services tainted by any of the practices prohibited by the CFA Group Vendor Code of Conduct, will not continue to receive CFA's business.

In addition to our robust Vendor requirements, CFA is piloting additional tools to support transparency in the CFA Group's supply chain. CFA conducts recurring on-site assessments of our Vendors to identify any potential concerns. CFA is also currently considering whether and how to best use third-party supply chain verification and independent unannounced audits with its Vendors.

6. Measures Taken to Remediate any Forced Labour or Child Labour

During the Reporting Period, we are not aware of any forced labour or child labour in our activities and supply chains. Accordingly, CFAC has not needed to take any measures during the Reporting Period to remediate any forced labour or child labour.

7. Remediation of the Loss of Income to the Most Vulnerable Families

During the Reporting Period, we are not aware of any forced labour or child labour in our activities and supply chains. Accordingly, CFAC has not needed to take any measures during the Reporting Period to



Chick-fil-A Canada Supply Chains Act Report

remediate the loss of income of the most vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

8. Training Provided to Employees on Forced Labour and Child Labour

CFAC provides employees and management who have direct responsibility for supply chain management with training on CFAC's business practices, Vendor requirements, and CFAC's Vendor Code of Conduct, including those provisions relating to mitigating risks of human trafficking and slavery. Employees and management failing to meet CFAC standards regarding slavery and trafficking are subject to disciplinary action.

9. Assessing CFAC's Effectiveness in Ensuring that Forced Labour and Child Labour are not Being Used in its Business and Supply Chain

CFAC is committed to maintaining high ethical standards across our business and supply chains. To ensure CFAC's policies regarding forced and child labour are effective, CFAC utilizes a multi-faceted assessment strategy focused on continuous improvement, transparency, and accountability.

CFAC conducts annual reviews of internal policies and the Vendor Code of Conduct to ensure they reflect current best practices and legal requirements. Additionally, CFAC monitors completion rates for staff training modules to ensure staff are equipped to identify and report risks.

CFAC visits Vendors regularly to ensure the Vendor Code of Conduct requirements are met. In addition to these requirements, CFAC is piloting additional tools to support transparency in our supply chain.

As new risks emerge in the global marketplace, CFAC remains dedicated to evolving assessment methods.



Chick-fil-A Canada Supply Chains Act Report

10. Approval and Attestation

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 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 Period listed above.

Date: May 21, 2026

A handwritten signature in black ink that reads "Andrew Cathy".

Andrew T. Cathy
CEO, Chick-fil-A, Inc.
Director, Chick-fil-A Canada ULC

I have authority to bind the company.

The Report was approved by the Board of Directors of Chick-fil-A Canada ULC pursuant to Section 11(4)(a) on May 21, 2026.