

## Modern Slavery Statement 2026



## NEWCOLD MELBOURNE PTY LTD MODERN SLAVERY STATEMENT 2025

### NEWCOLD MELBOURNE PTY LTD

#### MODERN SLAVERY STATEMENT

Prepared in accordance with the  
Modern Slavery Act 2018 (Cth)

Reporting period

**1 January 2025 – 31 December 2025**

NewCold Melbourne Pty Ltd  
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Australia

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## NEWCOLD MELBOURNE PTY LTD MODERN SLAVERY STATEMENT 2025

### Reporting Entity

NewCold Melbourne Pty Ltd (ACN 609 728 083) is the reporting entity for the purposes of this Modern Slavery Statement prepared under the Modern Slavery Act 2018 (Cth).

This statement is a **joint Modern Slavery Statement** made on behalf of NewCold Melbourne Pty Ltd and the entities it owns or controls in Australia following NewCold's acquisition of the Karras group.

### Entities Covered by this Statement

Entity	Registration
NewCold Melbourne Pty Ltd	ACN 609 728 083
NewCold Melbourne No. 2 Pty Ltd	ABN 67 613 140 453
Karras Transport & Storage Pty Ltd	ABN 76 600 040 720
E Karras Refrigerated Transport Pty Ltd	ABN 12 001 414 419
Karras Group Holdings Pty Ltd	ABN 75 605 350 794
Karras Transport & Storage Services Pty Ltd	ABN 62 600 041 094

These entities collectively form part of the NewCold Australian business operations. While certain entities continue to operate under the KARRAS name, they are owned and controlled by NewCold and are therefore included within the scope of this statement.

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## NEWCOLD MELBOURNE PTY LTD MODERN SLAVERY STATEMENT 2025

### Introduction

This is the Modern Slavery Statement of NewCold Melbourne Pty Ltd for the year ending 31 December 2025.

Modern slavery describes situations where coercion, threats or deception are used to exploit victims and undermine their freedom. Modern slavery includes human trafficking, slavery, servitude, forced labour, debt bondage and forced marriage.

Global estimates indicate that modern slavery remains a significant issue worldwide, with approximately 49.6 million people affected across the global economy.

NewCold is committed to ensuring that these practices do not occur within our operations or supply chains. As part of this commitment, NewCold participates in ethical sourcing initiatives and continuously reviews and strengthens our policies and controls to mitigate modern slavery risks.

NewCold is a member of SEDEX, and our operations are audited under the SMETA Pillar 4 ethical audit framework.

### Our Business, Operation and Supply Chain

NewCold is a global advanced automated cold chain logistics provider specialising in temperature-controlled supply chain solutions for the food industry.

NewCold operates highly automated cold storage warehouses across multiple regions, providing storage, handling and logistics services for food manufacturers and retailers.

In Australia, NewCold operates automated cold storage facilities supporting major food industry customers. Core activities include:

- refrigerated and frozen product storage
- automated warehouse management systems
- pallet handling and distribution
- transport coordination and logistics support.

During the reporting period, NewCold integrated the former KARRAS cold storage operations into the NewCold Australian business. These operations now form part of the NewCold operational footprint and are included within the scope of this Modern Slavery Statement.

NewCold's supply chains include suppliers providing:

- labour hire services
- transport and logistics services
- facility maintenance and engineering services
- cleaning and sanitation services
- equipment and infrastructure suppliers
- operational goods and services.

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### Identifying Risks

During the reporting period, NewCold continued to review and assess potential modern slavery risks within both its direct operations and its supply chains.

While the risk of modern slavery occurring within NewCold's direct operations is considered low, certain risks may exist within extended supply chains where there is less direct oversight of labour practices.

NewCold recognises that modern slavery risks may arise in industries that rely on subcontracted labour or operate in jurisdictions with weaker labour protections.

### Operational Risk

#### Employment Risk

NewCold is committed to fair and lawful employment practices. Several controls are in place to ensure modern slavery risks within our direct workforce are minimised.

These include:

- pre-employment screening including confirmation of rights to work in Australia
- employment contracts and enterprise agreements compliant with Australian industrial legislation
- verification of visa conditions where applicable
- adherence to Fair Work Australia standards
- ethical workplace policies governing employee conduct and treatment
- independent SEDEX SMETA Pillar 4 audits of operations.

#### Sector and Industry Risk

NewCold operates within the cold chain logistics sector, a specialised segment of the supply chain industry responsible for the storage, handling and distribution of temperature-sensitive food products.

While NewCold's direct workforce generally does not rely heavily on migrant or itinerant labour, the company engages external service providers including labour hire agencies, transport contractors, cleaning providers and maintenance contractors.

All contracted service providers are required to comply with NewCold's Business Partner Code of Conduct and applicable workplace laws.

#### Products and Services Risk

NewCold operates within an increasingly socially conscious market where customers and stakeholders expect supply chains to be managed responsibly and transparently. Ethical sourcing practices are incorporated into NewCold's procurement and supplier engagement processes to ensure that suppliers operate in a socially responsible manner consistent with NewCold's corporate values.

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Modern slavery risks may arise where supply chain visibility is limited, particularly where goods, services or materials are sourced from regions identified as having higher risks of labour exploitation. Guidance such as the Global Slavery Index is considered when assessing potential geographic and sector-related risks.

Where possible, NewCold prioritises engagement with Australian-based suppliers operating within strong regulatory and labour protection frameworks. All suppliers and contractors are required to comply with the NewCold Business Partner Code of Conduct, which requires adherence to applicable labour laws and explicitly prohibits all forms of modern slavery.

NewCold continues to strengthen supplier engagement practices to support ethical sourcing and responsible business conduct across its supply chain.

### Supply Chain Risk Assessment

NewCold recognises that modern slavery risks are most likely to arise within extended supply chains where there may be limited visibility over labour practices.

To address this risk, NewCold applies a risk-based approach to supplier engagement which considers factors including:

- geographic location of suppliers
- industry sector risk
- nature of goods or services supplied
- reliance on subcontracted or migrant labour.

Where higher-risk suppliers are identified, NewCold may undertake additional due diligence measures including supplier questionnaires, contractual commitments to ethical labour practices and review of available ethical audit outcomes.

NewCold continues to strengthen supplier due diligence processes and improve visibility across its supply chain to ensure that modern slavery risks are appropriately identified, assessed and addressed.

### Identified Potential Risk

Potential areas of risk identified by NewCold include:

- supplier engagement and procurement processes
- labour hire arrangements
- supply chains involving imported goods
- limited visibility of subcontracting arrangements in extended supply chains.

NewCold continues to improve oversight of these areas through policy development, supplier engagement and internal monitoring.

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### Mitigation and Remediation

NewCold is committed to the fair and ethical treatment of all employees, contractors and suppliers.

Employment conditions and remuneration comply with applicable employment legislation, industrial awards and regulatory requirements.

NewCold maintains several policies and programs designed to support ethical workplace practices and mitigate risks of exploitation.

Compliance with these policies is monitored through internal systems and investigated where necessary.

### Code of Conduct

NewCold's Code of Conduct outlines expected behaviours for employees and business partners and reinforces the organisation's commitment to ethical and lawful conduct.

The Code promotes responsible business practices, ethical decision-making and respect for human rights.

### Social Policy

NewCold aims to create positive social outcomes through responsible business operations.

The Corporate Social Policy aligns with international sustainability frameworks including the United Nations Sustainable Development Goals and the Corporate Sustainability Reporting Directive.

### SEDEX (Membership No. ZS1000089414)

NewCold is a member of SEDEX (Supplier Ethical Data Exchange).

SEDEX provides a platform for managing ethical supply chain data and supporting transparency with stakeholders.

NewCold's Australian operations are audited under the SEDEX SMETA Pillar 4 methodology. The most recent audit was completed in November 2025 by Intertek Australia and identified no major non-conformances.

### Speak Up! Whistleblower Policy

NewCold maintains a whistleblower reporting system to allow employees and stakeholders to report concerns about unethical behaviour, including suspected modern slavery.

Reports may be made anonymously, and protections are in place to prevent retaliation against whistleblowers.

During the reporting period no allegations relating to modern slavery were reported through these channels.

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### Business Partner Code of Conduct

NewCold requires suppliers and contractors to comply with the Business Partner Code of Conduct which outlines expectations for ethical business practices, legal compliance and respect for human rights.

Suppliers are expected to operate in accordance with these standards and may be subject to review or audit.

### Labour Hire Controls

NewCold maintains formal agreements with labour hire providers including the QA-3.5-S-13 Quality, Environment & Workplace Safety Agreement for Casual Agency Staff.

These agreements require agency staff to complete induction programs outlining NewCold policies and behavioural expectations.

## Governance and Accountability

NewCold recognises that effective management of modern slavery risks requires clear governance and accountability within the organisation.

Responsibility for oversight of modern slavery risk management sits with senior leadership within NewCold Melbourne Pty Ltd. Modern slavery considerations are incorporated into broader corporate governance frameworks including risk management, procurement oversight and ethical compliance programs.

Operational responsibility for implementing policies and procedures related to ethical sourcing and labour practices sits with relevant functional teams including human resources and Quality, Environment, Safety and Health (QESH). These teams work collaboratively to identify potential risks, monitor supplier engagement practices and ensure compliance with NewCold's ethical standards.

Senior management receives updates on relevant compliance matters and risk assessments as part of ongoing governance processes.

## Assessing Effectiveness

NewCold monitors the effectiveness of its modern slavery risk management activities through a range of mechanisms including:

- SEDEX SMETA third-party audits
- supplier reviews and contractual compliance monitoring
- internal policy compliance monitoring
- grievance and whistleblower reporting channels
- training completion tracking.

NewCold recognises that modern slavery risks may be hidden and continues to strengthen oversight and monitoring mechanisms.

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### Consultation with Controlled Entities

NewCold Melbourne Pty Ltd consulted with the relevant entities it owns or controls in the preparation of this Modern Slavery Statement.

During the reporting period, NewCold consulted with management and relevant personnel responsible for the former KARRAS operations that have been integrated into the NewCold Australian business. This consultation helped identify potential modern slavery risks and ensure consistent risk management practices across all operations covered by this statement.

Consultation included engagement with operational leadership, human resources and Quality, Environment, Safety and Health (QESH) representatives to identify potential modern slavery risks within operations and supply chains and to assess the effectiveness of existing controls.

The consultation process also involved reviewing policies, supplier engagement practices, labour hire arrangements and grievance mechanisms across both NewCold and the former KARRAS operations to ensure risks were assessed consistently across all entities covered by this statement.

### Future Focus

NewCold remains committed to strengthening its approach to identifying and addressing modern slavery risks.

Planned initiatives for 2026 include:

- ongoing review of supplier engagement processes
- introduction of an updated Supplier Code of Conduct
- continued employee awareness training
- periodic review of labour hire providers
- maintaining SEDEX SMETA audit compliance
- maintaining ISO certification
- continued ESG and sustainability reporting.

### Approval

This statement was approved by the Board of Directors of NewCold Melbourne Pty Ltd and signed by a responsible member of the entity in accordance with the requirements of the Modern Slavery Act 2018 (Cth).

*K Karthigeyan*

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Regional Managing Director ANZ

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