STUART ALEXANDER

1884 Pty Limited Modern Slavery Statement 2025

1. Introduction – about 1884 Pty Limited

1884 Pty Limited (‘**1884 Pty Limited’**), ABN 83 114 980 880 is a private company limited by shares and was registered in Australia in 2005. Our primary place of business is situated at 60 Union Street, Pyrmont, New South Wales.

Background to Modern Slavery and the Act

The Modern Slavery Act 2018 (Cth), introduced by the Australian Government in 2018, requires organisations with consolidated annual revenue above $100 million to publish an annual modern slavery statement. The statement must describe the risks of modern slavery in the entity’s operations and supply chains, and explain the actions taken, or planned, to identify, assess and address those risks.

Under the Act, modern slavery encompasses eight forms of serious exploitation:

1) Trafficking in persons.
2) Slavery.
3) Servitude.
4) Forced marriage.
5) Forced labour.
6) Debt bondage.
7) Deceptive recruiting for labour or services; and,
8) The worst forms of child labour which means situations where children are subjected to slavery or similar practices or engaged in hazardous work.

This is our sixth modern slavery statement and covers the period January 2025 to December 2025.

2. 1884 Pty Limited’s structure, operations and supply chains

1884 Pty Limited is the holding company for two other Australian registered companies:

1) Stuart Alexander & Co Pty Ltd (‘**SACO**’), ABN 43 000 058 677.
2) Stuart Alexander (Australia) Pty Limited, ABN 89 086 731 731.

This Statement has been prepared to meet the requirements of the Act and outlines the steps taken by 1884 Pty Limited and the two entities it owns or controls to minimise the risk of modern slavery occurring within our operations and supply chains.

SACO is the only other operating entity under the control of 1884 Pty Limited with annual revenue exceeding $100 million, and as such, it also qualifies as a Reporting Entity under the Modern Slavery Act 2018 (Cth). The Boards of 1884 Pty Limited and SACO have three common directors and a common Chairman; the 1884 Directors attend all SACO board meetings and are afforded copies of all SACO board reports and are informed of all significant SACO business issues. SACO’s day-today operations are overseen by its own management team.

This document constitutes a Joint Statement submitted in accordance with Section 14 of the Act, on behalf of both 1884 Pty Limited (ABN 83 114 980 880) and SACO (ABN 43 000 058 677). For the purposes of this Statement, SACO is referred to as the operating company of the Reporting Entities.

We continue to recognise that modern slavery represents the most severe form of exploitation in the workplace. It constitutes serious criminal conduct and grave human rights violations, often resulting in significant and long-lasting harm to victims. Modern slavery encompasses situations in which individuals are subjected to coercion, threats or deception and are unable to leave freely.

Overview of our business and operations

SACO, established in 1884 and formally registered in Australia in 1946, employs 128 people. SACO is one of Australia's largest privately owned companies, specialising in the import, marketing, and distribution of premium global brands. Its portfolio includes well-known consumer products such as Chupa Chups, Fisherman's Friend, Mentos, Tabasco, and Monin, which are distributed across the Australian market.

Stuart Alexander (Australia) Pty Limited, established in Australia in 1999, operates under a Distribution Agreement for Ocean Spray products within Australia. Founded in 1930, Ocean Spray is a grower-owned cooperative comprising approximately 700 cranberry growers and 50 grapefruit growers, sourcing produce from the United States, Canada, and Chile. Ocean Spray products are sold globally across four key product categories: juice, sauce, whole berries, and dried fruit. In Australia, Ocean Spray holds a leading market position in both the cranberry juice and dried cranberry categories.

3. Risks of modern slavery practices in our operations and supply chains

At SACO, we continue to be guided by **our values**:

***Be Brave**:*

We're a small business so we can be agile and bold. We are trusted and empowered to try, to risk, to question, challenge, discuss and decide.

***Own it**:*

We work together to do the right thing, we take responsibility for our actions and outcomes, we own our decisions, and we learn from mistakes.

***Share it**:*

We share our knowledge, information and experience, our friendship, our time, the company's history and our key learnings.

***Say it simply**:*

We communicate clearly, honestly, respectfully and simply.

***Care**:*

We care about ourselves, our colleagues, our careers, our brands and the community.

Our values continue to underpin how we engage with our people and the parties we work with, including principals, customers, suppliers, shareholders and broader stakeholders. They reflect the priorities of the business and provide a consistent framework to support informed and responsible decision-making across all levels of the organisation.

We remain committed to fostering a culture of transparency and accountability. SACO's Whistleblower Policy provides a secure and confidential mechanism for employees to raise concerns regarding suspected misconduct, without fear of retaliation, harassment or discrimination. Reportable matters include any conduct that may constitute an offence or other unlawful activity, as well as behaviour that is oppressive, improperly discriminatory or grossly negligent. The scope of reportable matters has been explicitly extended to include human rights concerns, including those relating to modern slavery.

As in previous years, we continue to adopt the definition of modern slavery risks as outlined in the *Modern Slavery Act 2018 (Cth)*:

> *"The potential for a reporting entity to cause, contribute to, or be directly linked to modern slavery through its operations and supply chain."*

We consider the risk of causing or contributing to modern slavery within our direct business operations to be low. Our workforce operates within an industry that is subject to relevant industrial awards, which establish minimum pay rates and employment conditions, including entitlements and leave arrangements.

We acknowledge that the risk of modern slavery is more likely to arise within our supply chain, including through our direct suppliers and their extended networks, particularly where goods or services are sourced from overseas. Our primary exposure is the risk of being directly linked to modern slavery practices through these supply chain relationships. These risks may arise across the following areas:

1) **Geographical locations:** Countries and Regions which are known to be at a higher risk of modern slavery or have been reported to have a higher prevalence of modern slavery by international organisations or NGOs.
2) **Industries:** Sectors where the nature of products, processes, or labour practices increases vulnerability to modern slavery.
3) **Products and services:** Items or services that carry an inherently higher risk due to their production, delivery, or utilisation.
4) **Entities:** Businesses or companies with poor governance, weak rule of law, internal conflict or significant migration flows which may lead to a higher risk of exposure to modern slavery.

As in past years, our primary risk of modern slavery in our supply chain rests in the provision from overseas providers of coffee, cocoa and the associated ingredients present in chocolate products. While our visibility over the practices of our suppliers' own supply chains is limited, we seek to mitigate this risk through the development of strong, long-term relationships with our suppliers. We expect our suppliers to conduct their operations with honesty, integrity, and in an ethical manner consistent with SACO's values.

There are approximately 300 Vendors which are utilised across our business and the associated entities, the majority of which rest with SACO.

Our top suppliers' primary source of business with us is the manufacturing of food and beverage products. This has continued to remain consistent during the current reporting period January 2025 to December 2025.

4. Actions taken to assess and address modern slavery risks, including due diligence and remediation processes.

SACO continues to build on its commitment to identifying and mitigating modern slavery risks across its operations and supply chains. In the 2025 reporting period, we continue to further strengthen the foundations established in prior years, with a focus on continuous improvement, supplier engagement, and practical implementation of our risk management framework.

Contractual Controls and Supplier Engagement

SACO maintains documented Distribution Agreements with all major and top-spend suppliers. These agreements include a Modern Slavery Clause which require suppliers to:

1) Acknowledge SACO's obligations under the Act;
2) Take reasonable steps to comply with the Act and avoid causing SACO to contravene it;
3) Provide information upon request regarding their structure, operations, supply chains, risk assessments, due diligence, remediation processes, and consultation practices;

4) Ensure the accuracy of all information provided relating to modern slavery compliance and notify SACO of any changes; and

5) Permit SACO to audit relevant documentation to verify compliance.

These agreements are consistently executed upon renewal of a contract or onboarding of a new supplier.

Supplier Risk Assessment and Framework Implementation

As with previous years, SACO continues to annually engage a third-party consulting firm to support the uplift and application of our modern slavery risk assessment framework. This framework continues to be utilised to provide a reliable and prescriptive approach to assessing the risks presented by suppliers and taking the appropriate actions as recorded in this Statement.

Key activities undertaken include:

1) Continued enhancement of supplier profiling and risk assessment processes, including desktop analysis of modern slavery risks across SACO's key suppliers;

2) Ongoing utilisation of the Modern Slavery Questionnaire for new and selected existing suppliers, with a focus on identifying risk indicators, reviewing supporting documentation, and assessing supplier responses;

3) Maintenance and application of a supplier risk classification framework, categorising suppliers as low, medium, or high risk based on financial, geographic, industry, and operational criteria;

4) Ongoing review and refinement of internal governance documents, including the Code of Conduct, Whistleblower Policy, and Distribution Agreements, to support alignment with modern slavery obligations;

5) Further development and strengthening of SACO's Modern Slavery Framework, ensuring alignment with broader corporate and risk management strategies;

6) The preparation of SACO's annual Modern Slavery Statement.

In 2025, we continued to monitor our top 50 suppliers, noting that none were rated high risk. Seventeen of these suppliers have published Modern Slavery Statements in Australia or internationally, providing additional assurance of their commitment to ethical practices.

For high-spend suppliers not required to submit a statement due to their geographic location, SACO will issue a Modern Slavery Questionnaire to further assess compliance if necessary.

For the last two reporting cycles, the questionnaire has been embedded as a standard component of SACO's vendor onboarding process, complementing the modern slavery provisions incorporated within our Distribution Agreements. The questionnaire includes targeted questions and requests for supporting documentation, enabling SACO to assess supplier practices across ten key risk areas. These questions are periodically reviewed and updated to ensure ongoing relevance. The use of this tool supports the identification and, where necessary, further assessment of potential modern slavery risks within our supply chain, including indicators of human trafficking or related practices. To date, we have found no evidence or suspicion of such practices within our supply chain.

Our continued engagement with suppliers, supported by structured questionnaires and follow-up processes, has enabled us to identify the following insights:

1) Our suppliers are generally at moderate to low risk of modern slavery.

2) Where applicable, suppliers have submitted UK or Australian Modern Slavery Statements to relevant authorities.

3) Our suppliers maintain a range of policies and procedures that actively address modern slavery risks, many of which are publicly available. These include Ethical Trading Policies, Supplier Codes of Conduct, Quality Management Systems, and Supplier Audit Procedures. Several suppliers also have policies that explicitly cover Child Labour, Forced Labour, and Freedom of Association, alongside Human Rights Position Statements that incorporate staff

Codes of Conduct. On-site audits are commonly conducted as part of supplier assessments prior to engagement, and some suppliers are members of the Sedex Members Ethical Trade Audit program, which provides a structured ethical audit methodology.

4) In the few cases where suppliers operate in high-risk countries or industries, they have addressed these risks through their own internal controls and audit procedures.
5) The results continue to be consistent with our previous desktop reviews, confirming that our suppliers continue to monitor their modern slavery risks and take positive steps to address these risks.

As SACO's supply chain has remained relatively unchanged during the current reporting period, we have continued to rely on the most recent comprehensive supplier risk assessment conducted in 2023 with ongoing monitoring of suppliers. We remain responsive to any material changes in supplier risk, complimented by our close relationships and use of questionnaires where necessary. Additionally, we continue to ensure that any new suppliers are screened with our Distribution Agreements. Several suppliers were discontinued over the past two years for reasons unrelated to modern slavery. Any significant changes to our top suppliers in future will trigger a full supplier risk assessment.

Development and Implementation of a Site Visit Checklist

During this reporting period, SACO continue using the formal Site Visit Checklist introduced in 2024, applying it consistently throughout 2025. This checklist was adapted from a high-level template provided by our external consultants and continues to be refined and maintained internally to align with SACO's operational context and modern slavery due diligence requirements, with updates made as needed. The checklist supports a consistent and structured approach for team members when visiting supplier facilities, helping ensure key modern slavery risk indicators are assessed. Observations are documented and reported to the Executive Leadership Team for review and, where necessary, follow-up action. Completion of the checklist remains mandatory for all staff undertaking supplier factory or site visits.

The checklist covers a range of risk indicators, including confirmation of legitimate business operations, site access controls, working conditions and attire of workers, workforce composition, evidence of on-site accommodation, and any signs of potentially exploitative practices, such as workers residing at the workplace or being transported at unusual hours.

Since the implementation of the checklist, it has been used during factory site visits at the following locations:

- Hershey, PA, USA (October 2025)
- Monin Factory Bourges, France (February 2026)
- Rawang, Sleangor, Malaysia (April 2026)
- Montana, Wolseley, South Africa (April 2026)

Across all visits, the checklist allowed us to confirm that each site appeared to be a legitimate place of business with no unreasonable access restrictions observed. Workers were suitably clothed and protected, and there was no evidence of workers being housed on-site in unsuitable conditions or any additional indicators of modern slavery of exploitative practices occurring. Where applicable, photographic evidence was collected and documented.

The Site Visit Checklist is now a mandatory component of SACO's on-site supplier engagement process, reinforcing our proactive approach to modern slavery risk assessment and continuous improvement in supplier oversight.

Introduction of a Modern Slavery Escalation Process

During this reporting period, SACO introduced a formal Modern Slavery Escalation Process to support the timely identification, reporting, and management of suspected or confirmed instances of modern slavery. This process establishes a clear and consistent pathway for team members to escalate concerns through appropriate internal channels, including management, People and Culture, or the whistleblower mechanism, with protections in place to maintain confidentiality and prevent retaliation.

All identified matters are subject to an initial assessment and are escalated to senior leadership, including the Chief Executive Officer, for oversight. The process also outlines structured investigation, remediation, and reporting requirements, ensuring that appropriate corrective actions are taken and that all incidents are documented and reviewed to inform continuous improvement of SACO's modern slavery risk management practices.

Introduction of a Supplier modern Slavery Risk Rating Framework

During this reporting period, SACO also implemented a Supplier Modern Slavery Risk Rating framework to support a more structured and risk-based approach to assessing modern slavery exposure across its supplier base. The framework assigns a composite risk score to suppliers based on defined criteria, including country risk, industry risk, supply chain complexity, existing controls and governance, and supplier criticality. These factors are weighted and aggregated to determine an overall risk rating, enabling SACO to consistently categorise suppliers as low, medium, or high risk. This risk-based approach supports prioritisation of due diligence activities, targeted supplier engagement, and enhanced oversight of higher-risk relationships, strengthening SACO's ability to identify, manage, and monitor modern slavery risks within its supply chain.

Monitoring of Legislative Changes

While no changes to the Act were identified during the reporting period, we continue to monitor regulatory developments, including the Australian Anti-Slavery Commissioner's recent recommendations to strengthen the legislative framework, and remain prepared to adapt our approach as required.

5. Assessing the effectiveness of our actions

The actions taken by us to date in this reporting period have further strengthened our approach to modern slavery risk management by implementing new tools and processes. This includes continued use of the formal Site Visit Checklist as well as our ongoing supplier engagement through modern slavery questionnaires and the requirements of our Distribution Agreements. These initiatives and ongoing processes have enhanced our ability to identify, assess, and address potential risks within our supply chain.

Our effectiveness is measured through regular review and refinement of internal policies and modern slavery related procedures, as well as ongoing supplier profiling and targeted questionnaires. The use of the Site Visit Checklist during supplier factory visits ensures direct observation and reporting of risk indicators, while continuous improvement in supplier oversight and engagement is supported by third-party consulting expertise.

We continue to monitor our top suppliers, with none rated as high risk and only one assessed as medium risk, which were appropriately addressed. We continue to operate with suppliers who on a majority basis maintain robust policies and procedures and provide SACO assurance of their commitment to ethical practices.

While we have not identified any instances or suspicions of modern slavery within our operations or supply chain, we acknowledge that visibility into indirect suppliers remains a challenge. We are committed to further developing our assessment processes and internal controls to ensure ongoing compliance and improvement in this area.

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6. The process of consultation with the entities owned or controlled by the reporting entities

Our approach to modern slavery reporting and risk management is led by SACO's Chief Financial Officer, supported by our consultants. The development and implementation of new processes has been communicated to all relevant stakeholders across 1884 Pty Ltd.

This statement has been distributed for review and agreement among all entities owned or controlled by the reporting entities. Feedback has been incorporated, and this statement has been approved for submission by the Board of 1884 Pty Limited.

7. Our Next Steps

Looking ahead, we continue to proactively work towards further reducing any risks of modern slavery within our operations and supply chain. Key priorities for the next reporting period include:

1) Adding Modern Slavery as a standing agenda item in regular Supplier meetings.
2) Continuing to assess supplier responses and conduct further due diligence where medium or high risks of modern slavery are identified.
3) Continuing to encourage all suppliers to meet modern slavery requirements and promoting best practice and continuous improvement.
4) Continue to review the results of observations made by staff using our Site Visit Checklist and take action where a risk of modern slavery is identified.
5) Continuing to monitor developments in the Modern Slavery Act and broader regulatory landscape and refine internal processes where required to maintain alignment with emerging expectations, including consideration of enhanced due diligence approaches where appropriate.

The Board of 1884 Pty Ltd has approved this statement on 24th June 2026.

Signed by:

__________________________ (Name)

Chairman __________________ (Position)