

Nu Pure Modern Slavery Statement 2023

Background

This Modern Slavery Statement ("the Statement") has been developed in accordance with the Australian Commonwealth Modern Slavery Act 2018 and includes references from the UN Guiding Principles on Business and Human Rights and ACSI Modern Slavery Risks, Rights and Responsibilities report for the financial year ending 31 December 2023 for Nu-Pure Beverages ("Nu-Pure").

Nu-Pure recognises Modern Slavery as a term which covers a range of exploitative practices including human trafficking, forced labour, forced criminality, domestic servitude and child exploitation. Nu-Pure is committed to limiting the risk of modern slavery within its own business, within its supply chains and through any other business relationships.

Structure, Operations and Supply Chains

Headquartered in Stapylton, Gold Coast. Nu-Pure is a manufacturer of 100% Australian-made Bottled Spring Water beverages. Nu-Pure's core manufacturing operations include Injection moulding of bottle preforms and caps, blow moulding, filling, labelling, and packaging of spring water.

As an organisation Nu-Pure employs over 300 employees spread across four manufacturing sites in four different states (Queensland, Victoria, New South Wales, and Western Australia). Through these sites, we serve some of Australia's biggest grocery and non-grocery brands as well as overseas customers in Japan and China.

Nu-Pure's supply chain includes domestic suppliers such as those for the supply of our recycled PET (rPET) resin as well as extending to third party suppliers in countries mainly located in the Association of Southeast Asian Nations (ASEAN) for other raw packaging materials.

Potential Risks

To improve the understanding and transparency of various modern slavery risks Nu-Pure is building a framework that will allow us to screen suppliers. Using online tools such as the Global Slavery Index (GSI) and the Modern Slavery Risk Registry to seek more in-depth information of our supply chain activities.

Some risks of modern slavery that Nu-Pure have identified include:

- Nu-Pure sources virgin PET and HDPE resin within ASEAN regions, some of these countries are registered as having high levels of forced labour and child exploitation via the GSI. As such this presents a potential risk that Nu-Pure's supply chain may reach into high-risk levels of modern slavery geographically.
- Certain industries are more exposed to modern slavery due to a variety of factors including the use of sub-contracting, migrant workers, and lower-skilled labour. Nu-Pure has identified certain third party contracted services including cleaning services are key modern slavery risk industries.
- Nu-Pure has also identified a risk in the purchasing of some consumable products. These include protective clothing (e.g. gloves, garments, and hairnets) which are categorised as having a risk of being produced under forced labour and sub-standard working conditions, which violate Australian Labour rights including pressuring workers with unreasonable production targets and the withdrawal of wages.

Due Diligence and Assurance (Actions)

In light of these potential risks, Nu-Pure takes a range of steps aimed to reduce the likelihood of

encountering modern slavery both on-site as well as within our supply chain.

- All Nu-Pure employees are given written contract of employment in language they understand and additionally proof of working rights and age are confirmed prior to recruitment.
- During the reporting period, Nu-Pure's Quality and Procurement departments have worked on developing a risk assessment that utilises data from the Global Slavery Index to help identify countries and industries that our supply chain may operate in high-risk areas. This risk assessment is planned to be implemented in the following reporting period. This will allow us to gain greater visibility into our supply chain and understand where hotspots are and what suppliers we should focus on to mitigate modern slavery risks.
- Remediation steps if an incident of modern slavery is encountered are documented in our Whistle Blower Policy and Grievance Policy which are made accessible to all employees.

Measuring Effectiveness

Nu-Pure frequently conducts SMETA audits on our sites to identify actions for improvement in relation to on-site ethical and labour work practices, health, and safety, environment and business ethics. During the reporting period, Nu-Pure conducted a 2- Pillar and 4- Pillar SMETA Audit on our Western Australia and Queensland site respectively. These audits provided a deeper probe into the processes used to address and mitigate modern slavery. As well as provide an opportunity to have a third-party auditor assess how effective our current processes are in managing modern slavery risks within our operations.

Following the insights from the audit, various improvement opportunities were identified such as:

- Additional formalisation of various policies including Child Labour and Forced Labour to make these more transparent to our employees and suppliers.
- Human Rights compliance with our suppliers and contractors.

The above points have been taken on board with the leadership team and will be worked on throughout the following reporting period.

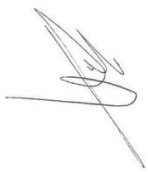
Consultation with controlled entities

As Nu-Pure is an entity that doesn't control any other entities. No consultation was made with any other business entities.

Board Approval

We are constantly reviewing and improving the measures we have in place to prevent, identify and mitigate aspects of modern slavery. We aim to create an environment that is free from the risks of modern slavery.

This Modern Slavery Statement has been approved by the Managing Directors of Nu-Pure Beverages on the 1st May 2024.



Mark Holmes

Managing Director – Finance and Operations



Barry Hamilton

Managing Director – Commercial and Supply Chain