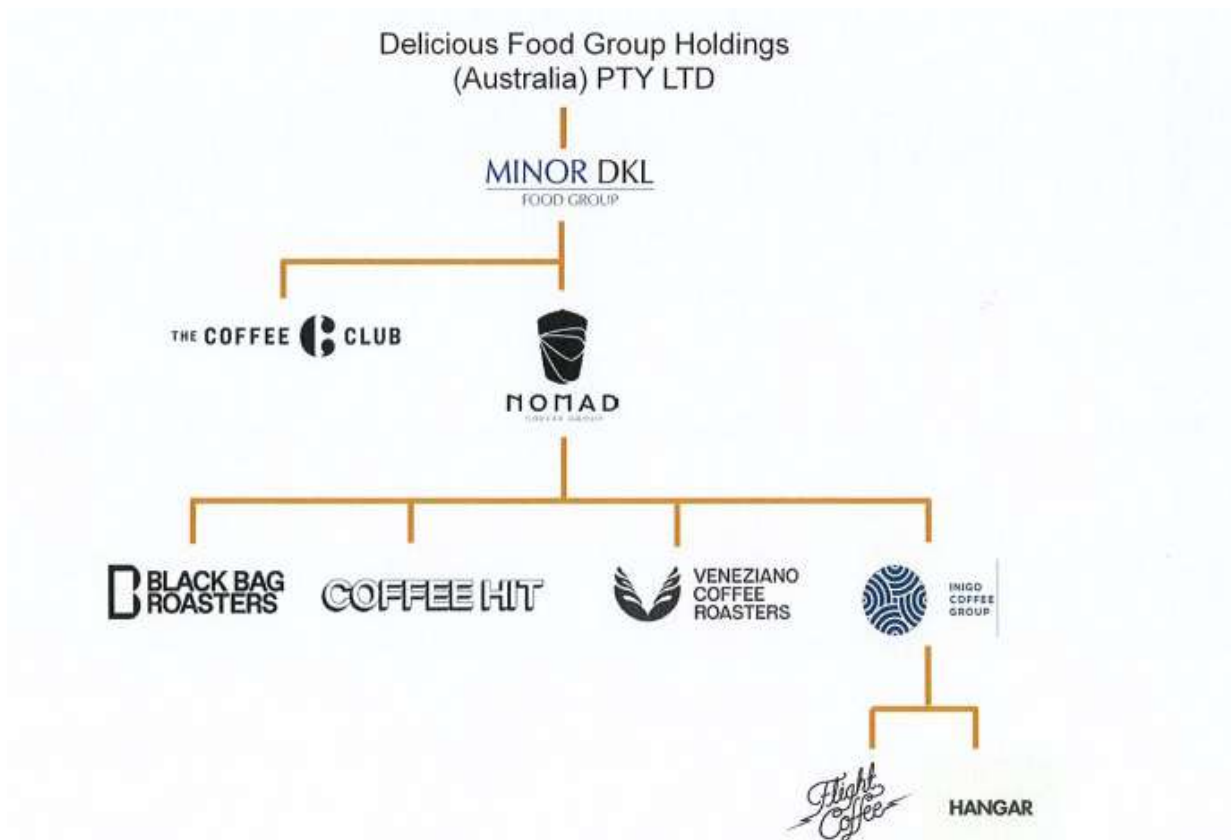


### Minor DKL Food Group Pty Ltd (ACN 127 640 733) Modern Slavery Statement 2024

This Second Modern Slavery Statement (**Statement**) is made by Delicious Food Holding (Australia) Pty Ltd ACN 127 320 183 (**DFHA**) and Minor DKL Food Group Pty Ltd (ACN 127 640 733) (**MDKL**), for the reporting period 1 January 2024 to 31 December 2024 (**Reporting Period**).

As at the end of the Reporting Period, subsidiaries of MDKL included Nomad Coffee Group Pty Ltd ACN 600 640 284 (**NCG**) and all entities listed in Schedule 1 (who are referred to collectively throughout this statement as '**MDKL Group**' (**MDKL Group** or **our**)).

This Statement is prepared by MDKL for the Reporting Period as required by the *Modern Slavery Act 2018* (Cth) (**the Act**). This Statement sets out our steps taken in relation to modern slavery over the Reporting Period.



## 1.0 About MDKL Group

DFHA is the Australian parent entity for the MDKL Group. Its sole asset and activities are limited to its ownership of 70% of the issued share capital in MDKL and MDKL's subsidiary companies. DFHA's income from MDKL is solely derived from dividends distributed by MDKL with expenditure limited to its funding of MDKL's activities. We have completed this Statement on the basis that DFHA's majority ownership of MDKL gives it the controlling interest and decision-making power for the purposes of the Act.

MDKL is a major food and beverage industry player, with a diverse portfolio spanning Australia and international markets. MDKL's operations include operating a network of franchised and company-owned retail outlets and coffee manufacturing and wholesale businesses.

Headquartered in Brisbane, MDKL's international presence extends across New Zealand, Southeast Asia, the Middle East, and other regions. International franchises are managed through Master or Area Franchise Agreements.

Operating for in excess of 35 years, MDKL's business includes the franchise, "The Coffee Club", focusing primarily on the retail sale of certain food and beverages under The Coffee Club brand and system. The Coffee Club franchises include café bar restaurant outlets, kiosk outlets and drive through operations. In general, the outlets provide a selection of beverages (which for some outlets may include alcoholic beverages), and breakfast, lunch and dinner meals, of which the product offering will vary between the different types of outlets.

As of the close of the Reporting Period, MDKL franchises or operates 404 sites globally. This includes 206 domestic and 150 international The Coffee Club outlets.

MDKL is also a majority shareholder of Nomad Coffee Group (**NCG**), a group of leading coffee roasting and wholesale businesses headquartered in Victoria. Operating 8 sites in Australia, NCG's brands include:

- Veneziano Coffee Roasters: A specialty coffee brand with a strong retail and wholesale footprint.
- Coffee Hit: A growing franchise network.
- Black Bag Roasters: An award-winning private label roasting division.
- Blend Co: A wholesale and service arm focused on regional markets.

Additionally, NCG owns a majority share of Inigo Coffee Group, which operates The Hanger retail outlet and manages Flight Coffee a roasting and wholesale business along with its private label division, Black Bag Roasters New Zealand. NCG also own minority interest of Blend Co Holdings, a wholesale and service arm focused on supplying to regional markets.

For further information about the MDKL Group, please refer to [www.minordkl.com.au](http://www.minordkl.com.au)  
For further information about the NCG, please refer to [www.nomadcoffeegroup.com.au](http://www.nomadcoffeegroup.com.au)

## 2.0 Our Structure, Operations, and Supply Chains

### 2.1 Structure and Operations

#### 2.1.1 Business

This is a joint statement for DFHA and the MDKL Group. The corporate governance, policies, practices, and approach to Modern Slavery outlined in this statement apply equally and are common to the entities within the MDKL Group.

See Section 1.0 for an outline of DFHA's operations.

Our franchise partners do not form part of the MDKL Group. We acknowledge the potential for our franchise partners to be exposed to Modern Slavery risk in their operations and supply chains. Our Franchise Agreement provides that our franchise partner must ensure compliance and best practice with respect to management of its employees and contracts by, without limitation, ensuring compliance with applicable legislation or industrial instruments, (for example a modern award or enterprise agreement, including but not limited to, payment of minimum wages and entitlements).

For the avoidance of doubt, our franchise partners have operational control over the conduct of their businesses, with support provided by MDKL. This support includes store operational assistance, access to a franchise business coach, training and development, support with national and local store marketing, human

resource assistance, and store design and construction support. In addition, MDKL also provides limited support services to its franchise partners in finance and property.

### 2.1.2 Workforce

Within the MDKL Group, all personnel are employed or contracted by the following subsidiary entities:

- Minor DKL Management Pty Ltd ACN 600 187 255;
- Minor DKL Construction Pty Ltd ACN 600 187 308;
- TCC Operations Pty Ltd ACN 600 187 657;
- Nomad Coffee Management Pty Ltd ACN 600 033 832; and
- Nomad Coffee Group Pty Ltd ACN 600 640 284.

As at 31 December 2024, the MDKL Group directly employed 543 team members and 0 contractors across our Australian operations. In the Reporting Period, our team members comprised of the following categories of employment status:

Team Member Breakdown	
Full Time	181
Part Time	73
Casual	289
Contractor	0
Visa Holders	51*

*\*Notes these Visa Holders are employed as either Full Time, Part Time or Casual employees.*

During the Reporting Period, MDKL Group's employees were based across the following locations:

- Brisbane;
- Gold Coast;
- Darling Downs;
- Bundaberg;
- Mackay;
- Moreton Bay;
- Townsville;
- Ipswich;
- Tamworth;
- Melbourne;
- Sydney;
- Adelaide; and
- Canberra.

Employees held positions in the following areas of MDKL Group's operations:

- Human Resources;
- Legal;
- Finance;
- Information Technology;
- Marketing;
- Property, construction and development;
- Operations;
- Procurement;
- Administration;

- Customer service;
- Food and Beverage attendants;
- Chefs and kitchen staff;
- Manufacturing;
- Sales; and
- Roasting and packaging services.

The MDKL Group supports its employees and contractors through our employment policies and procedures which comply with and are audited against Australian laws. All MDKL Group employees are issued with an Offer of Employment that complies with Fair Work requirements and any governing legislation particular to industry subsections we operate in, for example the *Restaurant Industry Award (2010)*.

Our Code of Conduct, alongside our Discrimination and Equal Employment Opportunity Policy, Grievance policy, and Whistle Blower policy are provided to, and required to be acknowledged by, all employees as part of their onboarding process. Additionally, we mandate onboarding and annual training for all staff to reinforce these critical principles.

The Code of Conduct of the MDKL Group sets our expectations for employee behaviour, emphasising the importance of maintaining a safe and lawful workplace. It explicitly prohibits sexual harassment, bullying, and discrimination and relays our zero-tolerance policy towards such behaviours.

Furthermore, our Whistleblower Policy plays a crucial role in maintaining our ethical standards. This policy outlines what constitutes inappropriate conduct and provides a structured process for reporting such issues, ensuring that all employees have a safe and confidential avenue to voice concerns without fear of reprisal.

As at the end of the Reporting Period, 51 of our employees held working visas, with the larger proportion of these employees employed in our Cafe operations. We have a skill and merit based hiring policy, and do not actively sponsor or source visa holders. All visa holders are subject to the same high employment standards as local employees; they are provided with Employment Agreements and are employed pursuant to the relevant governing legislation and visa requirements.

## 2.2 Supply Chains

The MDKL Group's supply chain operates as two distinct business units, one that procures goods and services for our franchise network, and one that procures products for the manufacturing side of the group. These products include, but are not limited to;

- Food and beverage suppliers;
- Coffee bean suppliers;
- Chocolate powder suppliers;
- Fish and seafood suppliers;
- Packaging and related products;
- Equipment and shop fit services;
- Uniform suppliers;
- IT equipment and services;
- Waste removal services;
- Cleaning services;
- Corporate and professional services including but not limited to legal advice, financial services, marketing services and insurance.

The MDKL Group evaluates new suppliers based on shared principles and commitments. We seek to source goods and services from suppliers whose employment practices respect human dignity and do not violate relevant laws. Further, we require all suppliers to comply with current regulations and our Code of Conduct, we also require key suppliers to complete an annual Self Assessment Questionnaire via the SEDEX platform.

## 3.0 Modern Slavery Risks

During the Reporting Period, the MDKL Group took steps to understand our exposure to Modern Slavery risks concerning operations. The MDKL Group acknowledges that the industries we operate in present a variety of Modern Slavery risks, including high-risk on-site activities and complex supply chains.

These risks were screened and identified using various tools, including the SEDEX (Supplier Ethical Data Exchange) platform and the Walk Free Global Slavery 2023 Index. Vendors and product categories were assessed on a spending basis, limited to 80% of the total spending within the MDKL head office, NCG head office spend, and the top 80% of products sold through The Coffee Club networks. The key risks identified for the Reporting Period following this process are thematically described below.

- **Retail outlet employees**

These risks primarily stem from the decentralised nature of employment within the franchise model, the increased likelihood of overseas workers on Visas, and the well-documented challenge of cash and mispayments that affect the Australian food service industry.

- **Manufactured finished goods**

Due to the complex nature of product manufacturing, including the various upstream suppliers involved in the chain, including those beyond Tier 1 and Tier 2 suppliers that we do not have a relationship with, in addition to the documented vulnerability of factory workers in Australia and overseas.

- **Raw materials**

These risks related directly to the manufacturing side of the MDKL Group, and include critical agricultural crop, coffee, which has a documented history of exploitation across various markets, as well as packaging. These products are produced in less accessible areas of our supply chain, reducing our visibility on the operations.

## **4.0 Addressing Modern Slavery Risks**

### **4.1 Actions taken by MDKL within the Reporting Period**

The MDKL Group is committed to taking steps to mitigate its exposure to Modern Slavery risks in our operations and supply chains and conducting business with uncompromising ethical standards. We are committed to a culture of compliance grounded in honesty, trust, and personal accountability.

Business Partners must comply with all applicable laws and regulations wherever they conduct their business. These include, but are not limited to, rules and regulations related to corporate governance, competition, product safety, product liability, occupational health and safety, human rights, worker rights and conditions, environmental protection, deforestation, biodiversity, waste and wastewater management, protection of intellectual property, protection of individual privacy, and equality at work.

During the Reporting Period, several actions have been taken to address the risks within our operations and our supply chains. These actions are as follows.

- **Compliance Committee**

A compliance committee was formed to understand better, analyse and act on the risk profile of the business, as well as execute our action points. The compliance committee for the Reporting Period comprises the following job functions.

- General Counsel and Senior Legal Counsel (MDKL).
- Head of Procurement (MDKL).
- Human Resources Director (MDKL/NCG); and
- Group Sustainability Manager (MDKL/NCG).

- **Our Teams**

We continued our program of proactive and reactive audits at franchisee network stores, provided ongoing education to partners, and reinforced relationships to promote open and transparent communication with head office. These actions reflect our ongoing commitment to operating ethically, transparently, and in compliance with legal requirements.

The MDKL Group supports its employees and contractors through clear employment policies that comply with Australian workplace laws and are regularly reviewed. All employees receive an Offer of Employment

aligned with Fair Work regulations and relevant industry awards, including the Restaurant Industry Award 2010.

We also maintain a strong focus on employee education and the enforcement of workplace standards. From onboarding and then through mandatory annual training, all employees are informed about the Group's Code of Conduct, Discrimination and Equal Employment Opportunity, Grievance, and Whistleblower policies. These policies establish clear expectations for ethical behaviour and workplace conduct and are actively enforced to ensure a safe and respectful working environment.

- **Business Partner Code of Conduct**

This Code of Conduct (Code) applies to all vendors, suppliers, consultants, contractors, service providers, contract partners, sales representatives, brokers, advisors, joint ventures, their subsidiaries, affiliated companies, subcontractors, or service providers in the supply chain and any other business partners of MDKL Group, including their employees, agents, and representatives.

The Code has been periodically issued to our critical suppliers on re-signing contracts and/or new supply contracts. As of the reporting period, 71 of the 118 identified critical suppliers have acknowledged and signed the Code. As noted at paragraph 4.2 below, MDKL will take steps over the next reporting period to have 80% of critical suppliers acknowledge and sign the Code.

- **Whistleblower Policy and Channel**

The MDKL Group recognises its obligations to provide effective whistleblower protection pursuant to Australian legislative requirements. To this, we have a comprehensive Whistleblower Policy in place to ensure that individuals can report any actual or suspected wrongdoing, misconduct, or unethical behaviour without any fear of reprisal or disadvantage. Over the reporting period, we engaged a new Whistleblower channel provider, in BDO Australia, for better accessibility and visibility for the group. This whistleblower channel is made available to our suppliers, employees and our franchise partner employees in the following locations.

- Displayed within The Coffee Club outlets
- Within our Business Partner Code of Conduct
- On the parent company website [www.minordkl.com.au](http://www.minordkl.com.au)
- Clubhouse, the training platform used throughout The Coffee Club network
- Employment Hero, the Human Resources System used within the reporting group

- **Grievance Policy**

The objective of our Grievance Policy is to ensure that all employees are provided with a safe place to work and happy working environment. This policy sets out the roles and responsibilities of all employees, ways to report and handle grievance and disciplinary action taken for a violation of this policy. The MDKL Group takes all formal grievances seriously and if appropriate, will be subject to some form of investigation or mediation. When a formal grievance is raised, we endeavour to ensure that the principles of natural justice and procedural fairness are adhered to.

- **Annual Review of Policies and Procedures**

Key policies were reviewed and amended, as part of the annual review process, these include;

- Business Partner Code of Conduct
- Whistleblower policy

- **Digital Tool Investment**

A key initiative for the Reporting Period was the investment and launch of a partnership with the SEDEX platform. This platform serves as a tool for risk management, housing SMETA (SEDEX Members Ethical Trade Audit), as well as a location to store Self-Assessment Questionnaire to understand better the specific risks and mitigation strategies of our supply partners.

Critical suppliers across the MDKL and NCG supply chains were engaged, and as of the end of the Reporting Period, 43 out of the 118 critical suppliers had been onboarded and had accepted connections within the platform, connecting a total of 169 individual locations.

- **Modern Slavery Training**

During the Reporting Period, employees of the group were required to acknowledge receipt and understanding of specific policy documents, including;

- The Business Partner Code of Conduct
- The Whistleblower policy

#### 4.2 Actions planned to address Modern Slavery Risks in the next reporting period

We acknowledge that the risks and the landscape of Modern Slavery are rapidly changing and evolving. Over the next 12 months, we plan to be in constant review of our risk profile and plan to implement a structured approach to mitigating our risk, as detailed below:

Task	Description
<b>Business Partner Code of Conduct</b>	<p>The MDKL Group will continue to drive compliance of the Business Partner Code of Conduct, with a target of &gt;80% of identified critical suppliers acknowledged and signed the Code by the end of the next reporting period.</p> <p>The Modern Slavery Compliance Committee will review the list of identified critical suppliers at least quarterly and amended where necessary. Adherence will be reported to the MDKL board on a quarterly basis.</p>
<b>Annual Review of Policies and Procedures</b>	<p>Each document will continue to be reviewed at least yearly, with adjustments to be proposed by the responsible parties; in the case of the Business Partner Code of Conduct, the parties include the Compliance Committee as above.</p>
<b>SEDEX</b>	<p>The group will continue to drive compliance of SEDEX Membership and SAQ completion, with a target of &gt;80% of identified critical suppliers joined.</p> <p>The Modern Slavery Compliance Committee will review the list of identified critical suppliers at least quarterly and amend it where necessary.</p> <p>Adherence will be reported to the MDKL board quarterly.</p>
<b>Modern Slavery Training</b>	<p>Over the next Reporting Period, each member of the MDKL and NCG procurement teams will be given access to and receive training on using the SEDEX platform to better drive compliance.</p>
<b>HR Actions</b>	<p>Over the coming Reporting Period, we'll continue our proactive and reactive audit program for network stores, roll out a self-audit tool, deliver ongoing partner education, and further strengthen relationships to support open communication through head office reporting channels.</p>

## 5.0 Effectiveness

### 5.1 Effectiveness of Assessment

The MDKL Group is committed to implementing and enforcing effective systems, controls, and reviews to mitigate our exposure to Modern Slavery risks in our operations and our supply chains. The effectiveness of our business operations is within the scope of regular operations audits.

Our approach to assessing the effectiveness of our system and actions is measured by and reported on by the following methods.

1. Number of Human Rights Violations reported via our Whistleblower channels
2. Number of sites that have a combined risk score of 6 or more within the SEDEX platform
3. Outstanding SMETA audit non-compliances and relevant corrective actions

## 6.0 Process of Consultation

In preparing this Statement, we engaged with key business areas responsible for procurement, risk and legal.

This statement has been reviewed by MDKL's Board of Directors.

## 7.0 Approval

This statement has been approved by the Board of Delicious Food Holding (Australia) Pty Ltd which is the principal governing body for the reporting entities named in this statement.



Signed by Craig Hooley  
Director  
Delicious Food Holding (Australia) Pty Ltd



### Schedule 1 – MDKL Group Entities

Entity	ACN
The Coffee Club Investment Pty Ltd	128 563 217
The Coffee Club Pty Ltd	010 866 369
The Coffee Club Unit Trust	ABN 17 427 137 563
The Coffee Club International Pty Ltd	116 144 999
The Coffee Club (NZ) Pty Ltd	116 145 549
The Coffee Club (Korea) Pty Ltd	116 145 524
The Coffee Club (Mena) Pty Ltd	119 345 701
The Coffee Club Franchising Company Pty Ltd	128 563 333
The Coffee Club Supply Pty Ltd	617 383 570
TCC EQ Stores Pty Ltd	134 383 574
Espresso Pty Ltd	066 142 247
The Coffee Club (Properties) Pty Ltd	066 111 742
TCC (QLD) Pty Ltd	105 313 657
The Coffee Club (NSW) Pty Ltd	070 128 684
The Coffee Club (VIC) Pty Ltd	070 128 666
BC Aus Operating Company Pty Ltd (Deregistered as at 24 March 2025)	151 599 558
Minor DKL Management Pty Ltd	600 187 255
Minor DKL Stores Pty Ltd	600 184 709
TCC Operations Pty Ltd	600 187 657
MDKL Services Pty Ltd	600 187 700
Minor DKL Constructions Pty Ltd	600 187 308
Nomad Coffee Group Pty Ltd	600 640 284
Veneziano Coffee Roasters Holdings Pty Ltd	600 033 645
Veneziano Coffee Roasters Pty Ltd	600 033 654
Black Bag Roasters Pty Ltd	604 900 334
Veneziano Coffee Assets Pty Ltd	603 045 209
Veneziano (SA) Pty Ltd	135 118 697
Nitro Coffee Pty Ltd	601 662 006
Coffee Hit Holdings Pty Ltd	600 008 311
Coffee Hit Systems Pty Ltd	603 044 720
Coffee Hit Properties Pty Ltd	603 044 766
Nomad Coffee Management Pty Ltd	600 033 832
Nomad Coffee Group NZ Limited (NZ)	Company Number 2158076
Flight Coffee Limited (NZ)	Company Number 3103112
The Hanger Limited (NZ)	Company Number 3963519
Good Time Gang Limited (NZ)	Company Number 3416192
Blendco Holdings Pty Ltd	659 559 743
Black Bag Roasters NZ Limited (NZ)	Company Number 7893631