



Nippy's



Farm grown. Family made.

MODERN SLAVERY STATEMENT

1 July 2024 – 30 June 2025

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INTRODUCTION

At Nippy's, we are committed to protecting and advancing human rights in our operations. We treat others with respect, dignity, encourage diversity and diverse opinions, provide safe and lawful working conditions, and promote equal opportunity for all. Nippy's supports the policies adopted by the Australian Government and other (relevant) governments to combat the trafficking of persons for any purpose.

Nippy's is committed to acting ethically and with integrity in all of its business dealings and relationships, and implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business operations or, insofar as is practicable, its supply chains.

Criteria 1 – Reporting Entity

The reporting entity is Atlex Pty Ltd as trustee for The Knispel Holdings Trust ABN 34 465 722 044 (“Nippy’s Holding Trust”) on behalf of the entities that it owns and / or controls (“Nippy’s Group”) for the financial year ending 30 June 2025.

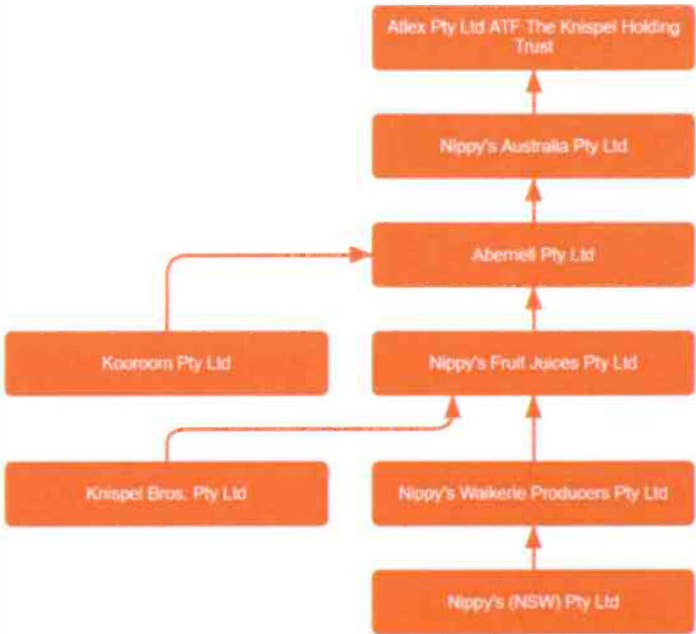
This modern slavery statement is made in accordance with the *Modern Slavery Act 2018* (Cth) (“Act”).

Criteria 2 – Our Structure, Operations and Supply Chains

Our Structure

Nippy’s Holding Trust is the head entity of the Nippy’s Group. Within the Nippy’s Group, there are various business entities beneath Nippy’s Holding Trust that run our operations as shown in the structure diagram below:

Kooroom Pty Ltd, Abernell Pty Ltd and Nippy’s Australia Pty Ltd are non-trading entities. The other entities within the Nippy’s Group are the operational entities which run our operations.



Our operations

Nippy's Group is a privately-owned business that originally started in the 1930's. We are a proudly South Australian-owned, family-run producer of fresh citrus fruit juices, citrus packing and flavoured milk products that are recognised, trusted and loved throughout Australia and the world.

Nippy's Group have three main operating facilities in South Australia, as follows:

- Birralee Road, Regency Park
- Loxton Drive, Moorook
- Ian Oliver Drive, Waikerie

Our supply chains

In support of our business functions, we engage a range of suppliers in the general activities of temporary labour services, beverage ingredients, machinery manufacturing and associated repair and maintenance, protective personal equipment and uniforms, telecommunications, office services and business technologies and professional services. Most of our suppliers are based locally in Australia, with a few suppliers based in Overseas.

Our supply chains can be divided into two supply chain groups – those that are core to the citrus and milk products arms of the business and those that are supplementary to our broader operations.

Core Business – citrus and flavoured milk product specific supplies and services including, but not limited to:

- Raw material suppliers (including citrus farmers),
- Plant and equipment suppliers for hire or purchase,
- Energy service suppliers.

Supplementary – corporate and sundry suppliers and services including, but not limited to:

- Corporate uniforms and branded merchandise,
- Communications and information technology,
- Legal and accounting,
- Cleaning,
- Motor vehicle purchasing and leasing,
- Office consumables.

Criteria 3 – Risks of modern slavery in operations and supply chains

Operational risks

Nippy's Group has a suite of policies and procedures in place to promote compliance and ethical conduct across our operations, including:

- Human Resources Policy & Procedure Manual
- Social & Ethical Trading Policy
- Equal Opportunity Policy
- Performance Improvement and Disciplinary Policy
- Work Health and Safety Policy
- Alcohol and Drugs Policy
- Smoke and Vape Free Policy
- Environmental Policy
- Non-Work-Related Injuries and Illness Policy
- Appropriate Workplace Conduct Policy
- Modern Slavery Policy

As outlined above, we have grievance mechanisms in place to allow employees, suppliers and other "eligible disclosers" to report grievances through various avenues. This extends to any modern slavery, human rights and employment concerns.

Nippy's Group pays its employees in accordance with Australian laws and requirements.

Nippy's Group acknowledges that engaging labour hire inherently comes with heightened modern slavery risks. As part of our standard operations, we have a number of systems in place that allow us to have visibility over the work completed and the working hours of employees and subcontractors. For example, we have mechanisms to ensure that accurate time information is kept for all site workers, which assists us in monitoring the employment and health and safety conditions on site.

Based on the above, we consider our operational risks of modern slavery to be low.

Supply chain risks

Nippy's Group acknowledges that like all entities, Nippy's Group is not immune to the risks of modern slavery, particularly deeper in our supply chains. As a producer of fresh citrus fruit juices, citrus packing and flavoured milk products that are predominantly made from Australian-sourced raw product, the immediate risk of modern slavery is low.

Nippy's Group utilises the UN Guiding Principles on Business & Human Rights "cause, contribute to, and directly linked to" framework to assess its operational and supply chain modern slavery risks.

Linkage to modern slavery	Description	Example
<i>Cause</i>	Modern slavery that the entity causes its via its acts and / or omissions.	An entity that withholds identity documentation from migrant workers as a condition of employment.
<i>Contribute to</i>	Activities and / or omissions by an entity which facilitate or enable modern slavery.	Engaging a supplier that is unusually lower cost than the industry average.
<i>Directly linked to</i>	Linked to modern slavery and harm through products, services or business relationships.	Engaging a supplier that is later discovered to be engaging in child labour.

Nippy's Group has developed a modern slavery risk matrix to apply across its business operations and supply chain. This enables us to identify specific features of our operations, supply chains, and environment that present higher risks of slavery. Using this, we are able to differentiate between our operational and supply chain risks.

Risk Category	Description of risk
Industry Sector	Certain sectors and industries, such as the horticulture industry in which we operate, may have higher modern slavery risks because of the nature of the horticulture industry characteristics, products and processes. The horticulture industry has been recognised as a higher risk industry for labour exploitation by various Government Inquiries (eg the Migrant Workers Taskforce Inquiry).
Product & Services Risks	Certain products and services may have higher modern slavery risks because of the way they are grown, produced, provided or used. In horticulture and farming services, this includes various labour-intensive processes involved with harvesting such as grading, packing and storing and the seasonal nature from which these services emerge. Other indicators may include the product made from materials or using services reported to involve a high risk of labour exploitation by international organisations.
Geographic Risks	While our operations are predominantly in Australia, we recognise that various farming activities are carried out in geographic regions with a more limited supply of services, support and amenities than major metropolitan cities. We also acknowledge that in remote locations the industry is more reliant on seasonal workers. In respect of supply chain functions overseas, we recognise that some countries may have higher risks of modern slavery, including due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors like poverty. Indicators may include where the country is reported to have weak rule of law by international organisations, including due to corruption, conflict and/or political instability.

Entity Risks	We are aware that some entities in our industry may not have formalised or systematic approaches to addressing labour management practices or modern slavery risks. This may be attributed to the prevalence of smaller businesses we work with who do not have extensive human resources or procurement teams, as well as the seasonal nature of our engagements. Despite this, we strive to build long-standing relationships with our suppliers, including smaller entities.
Seasonal Labour Models	Some entities may adopt a labour model involving the actual or likely use of labour hire, foreign workers, 'seasonal workers and working holiday makers', temporary workers and contractors who carry out functions that are not immediately visible (eg remote locations, or ad hoc engagements). Such labour models may increase the risk of slavery in the horticulture industry where the nature of the work performed is largely low-skilled or unskilled. Other indicators of risk may also be the absence of a labour hire licence required under relevant state labour hire licensing laws.

We have utilised the “cause, contribute to and directly linked to” framework and have assessed our key supply chains in the table below:

Supply chain	Risk for Nippy's Group	Description of risk
Raw materials	Directly linked to	<p>Certain raw materials carry heightened modern slavery risks, such as concentrated orange juice and drink packaging material, particularly when these raw materials are sourced from high-risk jurisdictions.</p> <p>Nippy's Group sources the majority of its equipment and raw materials from Australian suppliers.</p>
Uniforms	Directly linked to	<p>The Uniforms pose heightened modern slavery risks, particularly where these products are sourced from high-risk jurisdictions.</p> <p>Garments and uniforms, particularly those made with cotton and linen, have heightened modern slavery risks due to the risks associated with cotton supply chains. Cotton is a high-risk raw material for modern slavery due to complexities of these supply chains and when linked to high-risk jurisdictions such as China.</p>

<p>& Personal Protective Equipment (PPE)</p>	<p>Directly linked to</p>	<p>PPE has been a high-risk sector, particularly since the supply chain impacts and sourcing issues from the COVID-19 pandemic which increased the risk of forced labour.</p>
<p>Contract Labour</p>	<p>Directly linked to</p>	<p>In addition to the operational risks associated with seasonal labour hire, the Nippy's Group utilises contract labour in its operations. These suppliers carry heightened modern slavery risks due to the lack of control and oversight that Nippy's Group has over the hiring arrangements of the contractors. Nippy's Group has implemented detailed processes and procedures to regularly review and audit our contract labour suppliers in recognition of the heightened risk associated with these supply chains in the horticulture industry.</p>

Criteria 4 – Actions taken to assess and address modern slavery risks

Nippy's Group has, and will continue to, work in collaboration with key internal and external stakeholders to identify, prevent and address modern slavery risks occurring both locally and around the globe.

Accordingly, we have outlined some key action items that Nippy's Group will be undertaking in the FY26 reporting period to assess and address our modern slavery risks:

- Developing and implementing a Supplier Code of Conduct to govern and outline our expectations for our suppliers.
- Preparing a due diligence framework will then allow us to build supplier due diligence into our procurement and tendering processes as "business as usual".
- Review of our existing Modern Slavery Policy.
- Reviewing the existing framework for labour hire providers to ensure standards of good practice and compliance with workplace laws.

Criteria 5 – Assessing the effectiveness of our actions

At Nippy's Group, we continue to review our Policy framework and HR Policy Manual to ensure the best standards of ethical conduct and compliance with Modern Slavery Act standards.

We will continue to evolve our due diligence processes to ensure that we continue to identify key modern slavery risks in our organisation and supply chains to expand the scope of our supply chain risk assessment.

During the FY26 reporting period, Nippy's Group will prioritise the implementation of the action items outlined in Criteria 4.

Towards the end of the FY26 reporting period, Nippy's Group will review the action items undertaken and how effective these actions have been to assess and address its operational and supply chain modern slavery risks. This will then inform the action plans for the following reporting periods to continuously improve our modern slavery and broader compliance efforts going forward.

Criteria 6 – Consultation

This statement was prepared in consultation with key stakeholders and the Director's of the Nippy's Group, Jeffrey Knispel and Benjamin Knispel. This includes consultation with related entities, where required.

Criteria 7 – Any Other Relevant Information

The Nippy's Group is committed to continuously improving our oversight over, and mitigation of, the modern slavery risks in our business operations and supply chains.

APPROVAL

This modern slavery statement is Nippy's Group's first modern slavery statement and is for the period of 1 July 2024 to 30 June 2025.

It was approved by the joint Managing Director's of the Nippy's Group, Jeffrey Knispel and Benjamin Knispel.

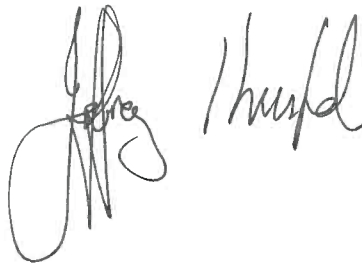
Benjamin Knispel – Joint Managing Director

31 December 2025

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Jeffrey Knispel – Joint Managing Director

31 December 2025

Handwritten signature of Jeffrey Knispel in black ink.