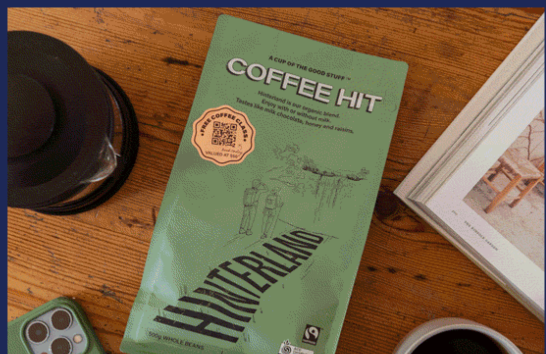


MINOR DKL
FOOD GROUP

2025 Modern Slavery Statement

Minor DKL Food Group Pty Ltd.
(MDKL Group)

ACN 127 640 733 | Reporting Period: 1 Jan 2025 - 31 Dec 2025

www.minordkl.com.au

A Message from our Group CEO

At Minor DKL Food Group, we recognise that modern slavery remains a significant global issue that can affect businesses and supply chains across our industry.

We are committed to identifying, assessing and addressing the risks of modern slavery within our operations and across our supply networks, including within our franchise model and the sourcing of key raw materials.

During the 2025 reporting period, we continued to strengthen our approach through supplier engagement, audit programs, and the rollout of our Business Partner Code of Conduct. We remain focused on improving our systems, oversight and transparency.

We also understand the importance of working collaboratively with our suppliers, franchise partners and internal teams to build awareness, strengthen compliance, and promote ethical business practices across our operations.

While we have made progress, we acknowledge that modern slavery risks are complex and evolving. We remain committed to continuous improvement, including enhancing our due diligence processes, refining our remediation approach, and increasing visibility across our supply chains.

On behalf of the Board, I confirm our commitment to ensuring that our business operates in a manner that respects human rights and upholds the principles set out in the Modern Slavery Act 2018 (Cth).

Richard Hinson
Chief Executive Officer
Minor DKL Food Group Pty Ltd

Contents

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

About MDKL Group

WHO WE ARE, OUR BRANDS AND OUR INTERNATIONAL PRESENCE

About Minor DKL Food Group

MDKL Group is a privately owned company and a subsidiary of Minor International PCL, a Thai-listed company, with a diverse food and beverage portfolio spanning Australia and international markets. MDKL Group is the owner for The Coffee Club franchise, and operates 150 locations globally, and 211 in Australia.

MDKL Group is also the majority shareholder of the Nomad Coffee Group, a multi-award-winning coffee manufacturing and wholesale group, including brands such as Veneziano Coffee Roasters, Coffee Hit, Flight Coffee, Blend Co and a contract roasting arm called Black Bag Roasters.

377
Global Sites

211
TCC Domestic

150
TCC International

16
NCG Sites (AU)

Headquartered in Brisbane. International presence: New Zealand, Southeast Asia, the Middle East and other regions via Master or Area Franchise Agreements.

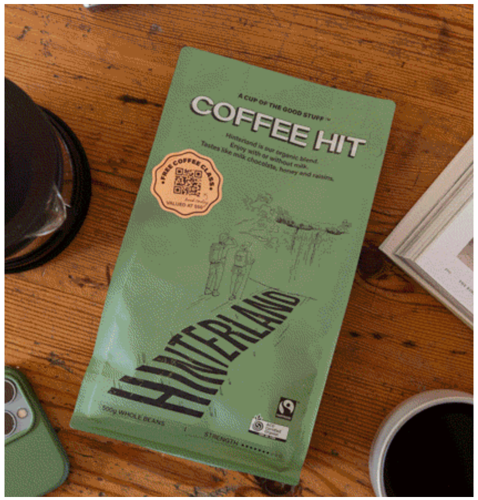
Our Brands


THE
COFFEE
CLUB
FEEL GOOD CAFES


Three
Stories


VENEZIANO
COFFEE
ROASTERS
ASPIRE
ORGANIC


Flight
Coffee
Sunshine


COFFEE HIT
HINTERLAND


sourced
DARK ROAST


BLACK BAG
ROASTERS


Blend Co
Coffee | Tea | Machinery

Operations & Workforce

HOW WE OPERATE AND WHO WE EMPLOY

Our Operations

Franchise Network

The franchise operations network operates out of the Brisbane head office and provides IT and legal support services for the entire MDKL Group, as well as Marketing, Human Resources, Procurement and Operations support for the franchise brands.

The Coffee Club is the largest brand in the MDKL Group, with over 200 outlets across Australia and an international footprint spanning New Zealand, Thailand, the Middle East and the Pacific.

The majority of outlets are independently owned and operated by franchisees, with a smaller number of company-operated stores. The Brisbane support team oversees brand standards, supplier relationships, menu development and franchisee training across the network.

Our Operations

Nomad Coffee Group

Our manufacturing hub operates as the Nomad Coffee Group (NCG), which operates two key manufacturing facilities, including a head office location in Melbourne. The group operates with an independent Human Resources, Procurement, Finance and operational teams, including various sales functions.

NCG also operate a small number of retail outlets across the country, and a New Zealand roasting and wholesale business. NCG is also a shareholder in the BlendCo coffee wholesaler and technical service subsidiary, with an increasing ownership scheduled over the next few years.

Workforce

As at 31 December 2025, the MDKL Group directly employed 655 team members across the Australian and New Zealand operations. These employees include those in our company owned retail stores, head office functions, field teams and operational functions.

CATEGORY	2025
Full Time	188
Part Time	108
Casual	286
Contractor	1
Visa Holders*	72
TOTAL	**655**

*Visa holders employed as Full Time, Part Time or Casual. MDKL Group has a skills and merit-based hiring policy.

- Brisbane
- Gold Coast
- Darling Downs
- Bundaberg
- Mackay
- Moreton Bay
- Townsville
- Ipswich
- Tamworth
- Melbourne
- Sydney
- Adelaide
- Canberra
- Perth
- Auckland NZ
- Wellington NZ
- Geelong
- Gosford

Employing entities: Minor DKL Management Pty Ltd | Minor DKL Construction Pty Ltd | TCC Operations Pty Ltd | Nomad Coffee Management Pty Ltd | Blend Co Holdings | Nomad Coffee Group NZ Limited

Supply Chains

HOW WE SOURCE GOODS AND SERVICES

Supply Chain Overview

The MDKL Group's supply chain operates across two business units:

FRANCHISE NETWORK PROCUREMENT

Over 450 vendors, with over 80% of spend in 2025 occurring across 56 vendors.

- Direct food & beverage suppliers
- Fish & seafood suppliers
- Packaging & related products
- Equipment & shop fit services
- Uniform suppliers
- Legal, financial & insurance costs
- IT equipment & telecommunication services
- Occupancy costs

MANUFACTURING (NCG) PROCUREMENT

Over 630 vendors, with over 90% of spend in 2025 occurring across 26 vendors, making up the below key categories;

- Green coffee suppliers (Over 80% of spend)
- Packaging inputs
- Coffee machinery and technical service
- Distribution & logistics
- Financial services
- Bought-in finished goods (e.g. coffee pods, chocolate & chai powders)

Key suppliers are required to become a member of Sedex* and complete the annual Self Assessment Questionnaire (SAQ) via the platform and sign and comply with our Business Partner Code of Conduct.

*MDKL Group recognises that third-party platforms such as Sedex are an important tool for risk identification but do not provide a complete or definitive assessment of modern slavery risks. These tools are supplemented by internal reviews, supplier engagement and audit programs.

Modern Slavery Risks

KEY RISK AREAS IDENTIFIED DURING THE REPORTING PERIOD

Modern Slavery Risk Areas

Three key risk themes were identified using the Sedex platform and Walk Free Global Slavery Index (screened on 80% of total spend):

Retail Outlet Employees

Decentralised franchise employment model, increased likelihood of overseas workers on visas, and documented challenges of cash payments and mispayments in Australian food service.

Supply Partner Risks

Complex product manufacturing with various upstream suppliers beyond Tier 1 and Tier 2. Documented vulnerability of factory workers in Australia and overseas.

Raw Materials - Coffee

Critical agricultural crop (coffee) has a documented history of exploitation across various markets. Products produced in less accessible areas reduce visibility on operations.

Categorisation of Modern Slavery Risk

MDKL Group assesses modern slavery risks in accordance with the UN Guiding Principles on Business and Human Rights.

Risks are categorised as follows:

Caused by MDKL Group:

Risks arising directly from MDKL Group's own operations and employment practices.

Contributed to by MDKL Group:

Risks where MDKL Group's business practices may incentivise, enable or exacerbate non-compliant labour practices (including through commercial or procurement arrangements).

Directly linked to MDKL Group:

Risks arising from entities with which MDKL Group has a business relationship, including franchisees and suppliers, where MDKL Group does not exercise direct control.

Within this framework:

- Employment risks within MDKL-operated entities are considered caused.
- Franchise network labour risks are considered directly linked.
- Certain supplier risks may be directly linked or contributed to, depending on the level of influence and commercial practices.

Retail Outlet Employees

Risk landscape

Modern slavery is a documented risk across the Australian and New Zealand cafe and retail sector. Vulnerable cohorts such as visa holders are disproportionately exposed to exploitation, wage underpayment, and unsafe working conditions.

Internal employees

For our directly employed workforce, our Human Resources teams manage compliance end-to-end, including right to work documentation and adherence to Australian and New Zealand labour laws.

Our largest exposure

Franchisees operate as independent businesses and are responsible for their own employment practices and compliance with applicable workplace laws. MDKL Group does not employ franchisee staff nor exercise direct control over their employment arrangements. However, MDKL Group recognises that it may influence franchisee practices through its franchise system, operational guidelines and commercial arrangements. Accordingly, MDKL Group adopts a risk-based approach to monitoring and supporting franchisee compliance, including audit programs, training and supplier standards.

Supply Partner Risks

Due to the large volume of suppliers across the brand, key suppliers are identified by the below;

Spend based

Tier 1 suppliers include those that sit in the top 80% of our group spend
Tier 2 suppliers are also included based on the top 80% of spend through the franchise network.

Risk based

High risk categories, as defined by Walkfree.org, across tier 1 and tier 2, these include businesses involved in;

- Electronics
- Garments
- Fish
- Farming

Brand risk

Where our brand(s) IP is being used by license, this is considered a key supplier risk, due to the increased public perception risks.

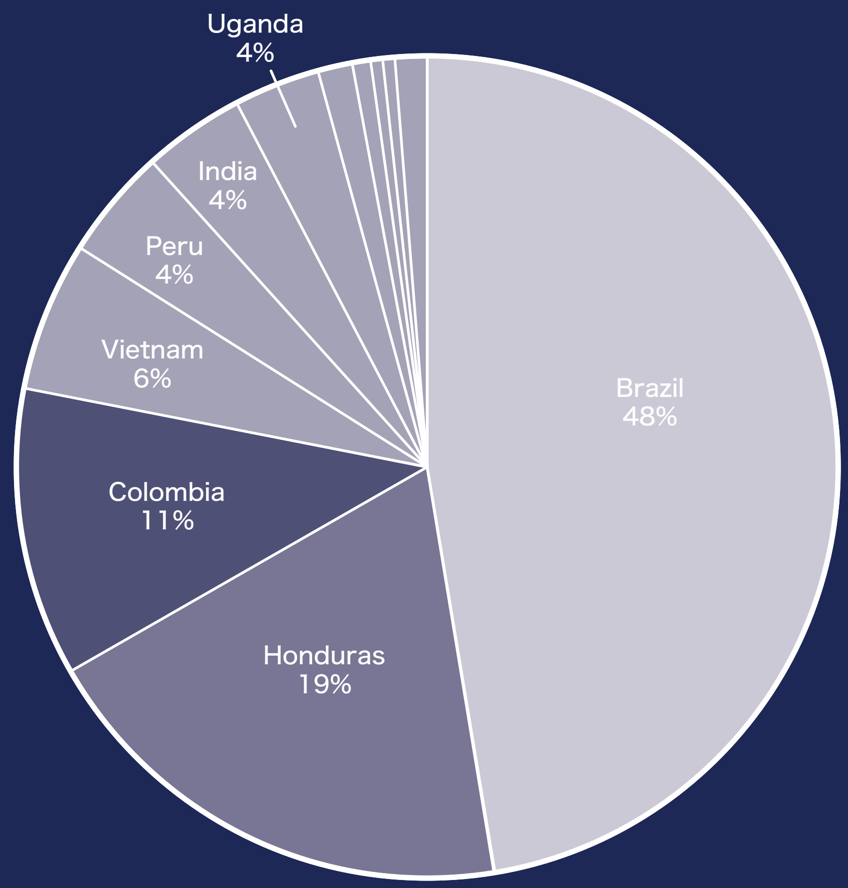
Our supply chain spans multiple tiers. Visibility decreases at each level beyond our direct suppliers, requiring strong supplier relationships to mitigate supply chain risks.

Raw Materials

Coffee

Where we buy our coffee

COUNTRY	PURCHASE QUANTITY (KGS)	INHERENT FORCED LABOUR RISKS
Brazil	3,433,459	7.0 High risk
Honduras	1,403,144	7.6 High risk
Colombia	816,864	7.4 High risk
Vietnam	423,200	7.4 High risk
Peru	317,653	6.8 High risk
India	291,000	7.8 High risk
Uganda	246,822	8.1 High risk
Papua New Guinea	93,170	7.0 High risk
Ethiopia	53,195	7.5 High risk
Guatemala	35,328	7.4 High risk
Rwanda	29,070	6.8 High risk
Other (Various microlots, spot coffees and purchases under 1 container)	98,564	
	7,241,469	



Risk assessed via the Sedex methodology.

Sustainable Coffee Program

Sustainable Coffee Program (SCP)

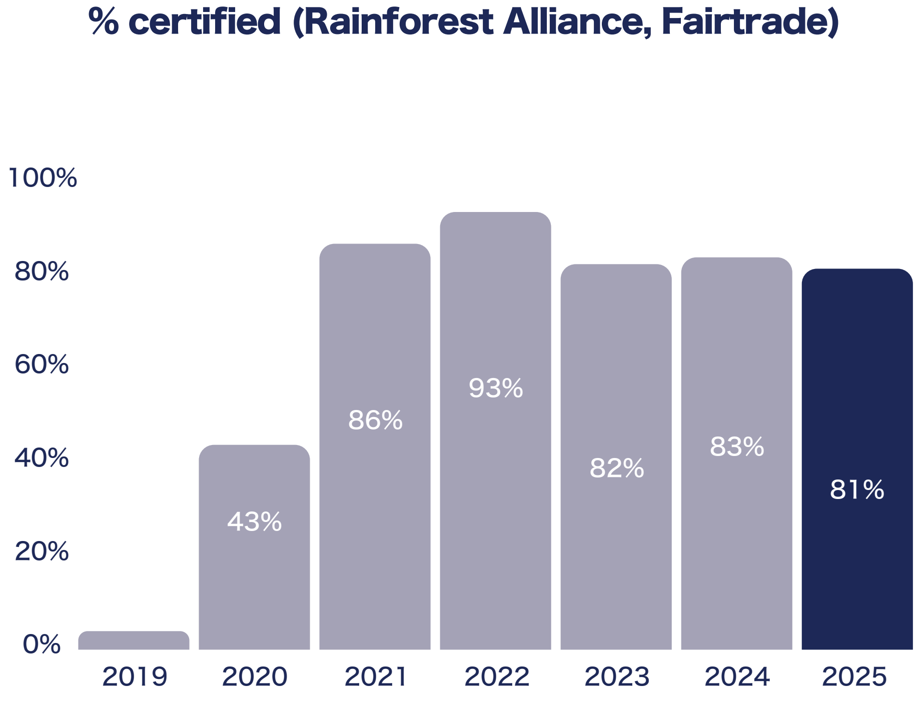
Our SCP is built on long-term relationships, transparency and two-way communication.
Supply must meet one of two criteria:

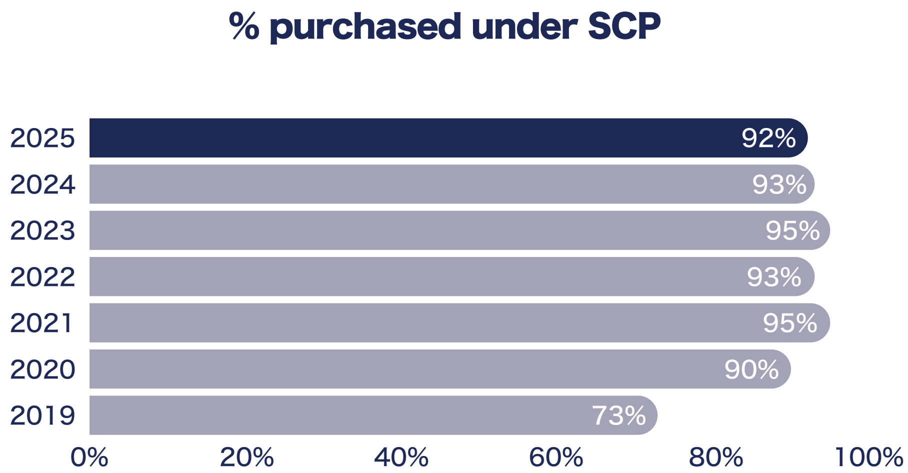
Direct relationships — coffees sourced from partners we have worked with for 3+years, where we hold direct relationships with the cooperative or exporter at origin. Long-term broker partners facilitate vetting and importation.

Third-party certification — coffees certified under recognised programs such as Fairtrade or Rainforest Alliance.

Both supply chains are subject to on-site audits by independent third parties.

Supply outside our SCP is still vetted and managed through a broker partner, howeverwe do not hold direct relationships with the in-country parties.





Addressing Modern Slavery Risks

ACTIONS TAKEN DURING THE 2025 REPORTING PERIOD

Modern Slavery Due Diligence Framework

MDKL Group applies a risk-based due diligence framework across its operations and supply chains:

1. Supplier onboarding and screening - Risk screening using Sedex, country risk indices and sector risk analysis. Completion of Self-Assessment Questionnaires (SAQs).

2. Contractual controls - Mandatory compliance with the Business Partner Code of Conduct. Ongoing contractual obligations relating to labour standards.

3. Ongoing monitoring - Sedex platform monitoring, Targeted SMETA audits based on risk thresholds and Franchise network employment audits (reactive and proactive).

4. Escalation - Trigger events include audit findings, whistleblower reports or regulatory notifications. Corrective Action Plans are implemented with defined remediation timeframes. Escalation responses are proportionate to the severity and persistence of the risk and may include enhanced monitoring, suspension of supply, or termination of the relationship in cases of serious or repeated non-compliance. This framework continues to evolve as part of MDKL Group's continuous improvement approach.

5. Remediation approach - Where modern slavery risks or harms are identified, MDKL Group is committed to remediation that prioritises the safety, rights and wellbeing of affected individuals. This may include requiring corrective action by business partners, supporting improved labour practices, and, where appropriate, engaging with suppliers or partners to address root causes. Termination of relationships is considered where there is a failure to remediate serious non-compliance.

Actions Taken During the Reporting Period

ESG RISK Compliance Committee

This committee was re-formed and realigned to business needs.

Comprises: General Counsel & Senior Legal Counsel, Chief Procurement Officer, Group Sustainability Manager (MDKL Group/NCG)

Business Partner Contracts

Issued to critical suppliers on new/re-signed contracts, with a target to reach 80% compliance. MDKL Group achieved this target with 80.3% of suppliers compliant at the end of 2025. NCG missed this target, and achieved 77%, and will increase focus on this in 2026.

Proactive Audit Schedule

Citation Group was deployed to complete independent 3rd party audits of the employment standards in the retail network and completed 50 audits for the year. Corrective action plans were delivered to sites with non-compliance issues.

Sedex Platform

This year MDKL Group began implementation of the platform across our key suppliers, with a compliance target >80% of key suppliers to join and connect via the platform. The target was not achieved and will be a continued focus moving into 2026.
MDKL Group achieved 54%.
NCG achieved 73%.

Annual Business Partner Code of Conduct Reviews

Both the MDKL Group Business Partner Code of Conduct and the NCG Supplier Code of Conduct were reviewed during the reporting period and updated to strengthen modern slavery risk controls and expectations.

Modern Slavery Training

Relevant procurement employees have been trained in the Sedex platform, and on risk topics in their relevant sectors.

Actions Planned for the Next Reporting Period

These initiatives reflect current priorities and may be refined as part of MDKL Group's ongoing risk assessment and continuous improvement processes.

INITIATIVE	DESCRIPTION & TARGET
Business Partner Code of Conduct	Target: >90% of key suppliers to acknowledge and sign by end of next period. The ESG Risk Compliance Committee reviews list quarterly. Report to board quarterly. Remediation procedures to be agreed upon and implemented.
Annual Policy Review	Each document reviewed at least yearly. Business Partner Code reviewed by The ESG Risk Compliance Committee.
Sedex Compliance	Continue Target of >80% of critical suppliers connected. Implement SMETA audit thresholds. The ESG Risk Compliance Committee reviews list quarterly. Report to board quarterly. Remediation procedures to be agreed upon and implemented.
SMETA (Sedex Methodology Ethical Trade Audit)	Establish the trigger for a SMETA audit request to be issued.
Key supplier reviews	Critical ESG items to be included in business partner quarterly reviews.
HR & Franchise Audit Actions	Perform 70 proactive audits, Roll out a self-audit tool. Deliver ongoing partner education. Strengthen HQ reporting channels.

Effectiveness of Our Actions

HOW WE MEASURE PROGRESS

Assessing Effectiveness

The MDKL Group is committed to implementing effective systems, controls, and reviews. Effectiveness is measured by:

Human Rights Violations

Number of human rights violations reported via whistleblower channels during the reporting period.

0
Recorded

MDKL Group recognises the absence of reported incidents does not necessarily indicate the absence of risk. As such, ongoing focus is placed on strengthening reporting channels, increasing awareness, and improving detection mechanisms across operations and supply chains.

Sedex Compliance

Number of sites with a Sedex Combined Risk* score of 6 or more within the Sedex platform.

17
Recorded

This is largely driven by non-completion of the Self Assessment Questionnaire, and continues to be a focus for 2026.

SMETA Audit Compliance

Outstanding SMETA audit non-compliances and relevant corrective actions taken.

No SMETA audits issued in 2025

Due to time constraints, this was not initiated in 2025, and remains a project for 2026.

Effectiveness reviewed by the Compliance Committee and reported to the MDKL Group Board.

*A Sedex Combined Risk score integrates inherent geographic/sector risks with site-specific data from supplier questionnaires (SAQs) and SMETA audits.

Consultation & Approval

How this statement was prepared and approved

Consultation & Approval

Consultation Process

Consultation was undertaken through structured engagement with key business units, including workshops, data requests and iterative review processes.

Each relevant entity provided input on its operations, workforce profile, supply chain exposure and risk mitigation activities. This process enabled MDKL Group to identify and assess modern slavery risks across both controlled entities and business relationships, including franchise operations. Senior management from Legal and Procurement reviewed and validated the information included in this statement prior to Board approval.

Board Approval & Sign-off

This statement was approved by the Board of Minor DKL Food Group Pty Ltd — the principal governing body for the reporting entity.

Date of Approval: 30 / 06 / 2026

Richard Hinson

Chief Executive Officer
Minor DKL Food Group Pty Ltd
ACN 127 640 733

Schedule 1 - MDKL Group Entities

For the purposes of this statement, "owned or controlled" entities are those over which MDKL Group has direct or indirect control through ownership or governance rights.

Franchisees are not owned or controlled entities. They operate as independent businesses; however, they are considered within the scope of this statement where modern slavery risks are directly linked to MDKL Group through contractual and brand relationships.

ENTITY	ACN / REGISTRATION NUMBER
The Coffee Club Investment Pty Ltd	128 563 217
The Coffee Club Pty Ltd	010 866 369
The Coffee Club Unit Trust	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
First Avenue Company Pty Ltd	134 383 574
Espresso Pty Ltd	066 142 247
The Coffee Club (Properties) Pty Ltd	066 111 742
The Coffee Club Properties (NSW) Pty Ltd	105 313 657
The Coffee Club (NSW) Pty Ltd	070 128 684
The Coffee Club (VIC) Pty Ltd	070 128 666
Minor DKL Management Pty Ltd	600 187 255
Minor DKL Stores Pty Ltd	600 184 709
TCC Operations Pty Ltd	600 187 657
Minor DKL Constructions Pty Ltd	600 187 308
Nomad Coffee Group Pty Ltd	600 640 284
Veneziano Coffee Roasters Pty Ltd	600 033 654
Black Bag Roasters Pty Ltd	604 900 334
Coffee Hit Holdings Pty Ltd	600 008 311
Nomad Coffee Management Pty Ltd	600 033 832
Inigo Montoya Limited (NZ)	Co. No. 2158076
Flight Coffee Limited (NZ)	Co. No. 3103112
The Hanger Limited (NZ)	Co. No. 3963519
Blendco Holdings Pty Ltd	659 559 743

Appendix

The following details identify the mandatory reporting criteria outlined in section 16 of the Modern Slavery Act 2018 and provides page references to where corresponding disclosures have been made in this statement.

Mandatory Reporting Criteria

(a) Identify the reporting entity	Pages 4 - 6
(b) Describe the structure, operations & supply chains of the reporting entity	Pages 7 – 12
(c) Describe the risks of modern slavery practices in the operations & supply chains of the reporting entity and any entities that the reporting entity owns or controls	Pages 13 – 19
(d) Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence & remediation procedures	Page 20 - 23
(e) Describe how the reporting entity assesses the effectiveness of such actions	Page 24 - 25
(f) Describe the process of consultation with any entities that the reporting entity owns or controls	Page 26 - 27
(g) Any other relevant information	N/A