

# **1884 Pty Limited Modern Slavery Statement 2024**

## 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 main subsidiary business (Stuart Alexander & Co Pty Ltd) holds its primary place of business at 60 Union Street, Pyrmont, New South Wales.

### ***Background to Modern Slavery and the Act***

In 2018, the Australian Government introduced the *Modern Slavery Act 2018 (Cth)*, requiring entities with annual consolidated revenue exceeding \$100 million to submit a yearly statement. This statement must identify and assess risks of modern slavery within their operations and supply chains, and outline the steps taken, and planned, to 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 fifth modern slavery statement and covers the period January 2024 to December 2024.

## 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, which is intended to meet the requirements of the Act, describes the steps taken by 1884 Pty Limited and the above two entities that it owns or controls, in minimising the risk of modern slavery occurring in our business and supply chain.

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). Both 1884 Pty Limited and SACO share the same Board of Directors, and SACO's day-to-day operations are overseen by its own management team.

This document is 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 extreme form of exploitation in the workplace. It involves constitutes serious criminal conduct and grave violations of human rights, often leaving victims with devastating long-term consequences. The term modern slavery refers to situations where individuals are subjected to coercion, threats, or deception.

### ***Overview of our business and operations***

SACO, established in 1884 and formally registered in Australia in 1946, employs 117 people. It is one of Australia's largest privately-owned companies, specialising in the import, marketing, and distribution of premium global brands. These include household names such as Chupa Chups, Fisherman's Friend, Mentos, TABASCO, and MONIN, which SACO distributes across Australia.

Stuart Alexander (Australia) Pty Limited, registered in Australia in 1999, operates under a Distribution Agreement for Ocean Spray products within the Australian market. Founded in 1930, Ocean Spray is a grower-owned cooperative comprising 700 cranberry growers and 50 grapefruit growers, sourcing crops from the USA, Canada, and Chile. Ocean Spray products are sold globally in four formats: juice, sauce, whole berries, and dried fruit, and it holds the position of Australia's leading brand for both cranberry juice and dried cranberries.

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

At SACO, we are 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 shape how we engage with one another, as well as with our principals, customers, suppliers, shareholders, and broader stakeholders. They reflect the priorities of our business and serve as a compass for decision-making across all levels of the organisation.

We remain committed to fostering a culture of transparency and accountability. Our Whistleblower Policy ensures all employees can raise concerns about any illegal conduct or serious wrongdoing, without fear of retaliation, harassment, or discrimination. Reportable matters include any act, omission or course of conduct that constitutes an offence or any illegal activity, or that is oppressive, improperly discriminatory or grossly negligent. We have explicitly extended the scope of reportable matters to include violations of human rights as they relate 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, contributing to or being directly linked to modern slavery within our immediate business operations to be low risk. Our workforce operates in an industry that is covered by relevant pay awards, which provides for minimum pay rates and conditions of employment, including entitlements and leave.

We recognise the potential risk of modern slavery within our supply chain, including among our direct suppliers and their own networks, particularly those operating overseas. Our most significant risk of modern slavery is being *directly linked* to modern slavery practices. These risks may arise in 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 labor 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. Our visibility into the suppliers of our direct suppliers is limited, which increases the risk of modern slavery occurring undetected within their supplier's operations. We continue to maintain close long term relationships with our suppliers and ensure that they conduct their business with honesty and integrity and in an ethical manner which aligns 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 includes the manufacturing, marking, distribution and selling of food and beverage products. This has continued to remain consistent during the current reporting period January 2024 to December 2024.

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

SACO continues to strengthen its commitment to identifying and mitigating modern slavery risks across its operations and supply chains. In the 2024 reporting period, we have built upon 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 requiring 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 executed upon renewal of a contract or onboarding of a new supplier.

##### **Supplier Risk Assessment and Framework Implementation**

SACO continues to engage a third-party consulting firm to support the development and application of a 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) Ongoing supplier profiling and risk evaluation, including desktop reviews of the operational risks of modern slavery in SACO's top suppliers;
- 2) Implementation and use of a Modern Slavery Questionnaire for new and selected existing suppliers, focusing on risk indicators and supporting documentation;

- 3) Classification of SACO's suppliers into low, medium, or high-risk categories based on financial, geographic, industry, and operational factors;
- 4) The continued review and refinement of internal policies including our Code of Conduct, Whistleblower Policy, and Distribution Agreements to ensure alignment with modern slavery compliance.
- 5) The continued review and refinement of our Modern Slavery Framework in line with our corporate and risk strategies.
- 6) The drafting of our yearly Modern Slavery Statement.

In 2024, we continued to monitor our top 50 suppliers, noting that none were rated high risk and only one was assessed as medium risk, which was appropriately addressed. 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 may consider issuing its Modern Slavery Questionnaire to further assess compliance.

This questionnaire is now a standard part of our new vendor onboarding process and complements the modern slavery provisions in our Distribution Agreements. It includes a series of targeted questions and requests for supporting documentation, enabling SACO to assess supplier practices across ten key risk areas. This process is instrumental in identifying and, where necessary, addressing potential instances of human trafficking or modern slavery. 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. This approach ensures consistency while remaining responsive to any material changes in supplier risk. We continue to provide modern slavery questionnaires where necessary and 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 developed and implemented a formal Site Visit Checklist. This checklist was adapted from a high-level template provided by our external consultants and refined internally to align with SACO's operational context and modern slavery due diligence requirements. The checklist is designed to ensure that every team member visiting a supplier's factory

systematically evaluates key modern slavery risk indicators during their visit and communicates their observations directly to the Executive Leadership Team. This checklist must always be completed when a staff member visits a supplier factory or site.

A range of criteria is covered in the checklist, including verification of legitimate business operations, access restrictions, worker conditions and attire, workforce numbers, evidence of on-site accommodation, and any signs of potentially exploitative practices such as workers sleeping 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:

- Avery Island, Louisiana, USA (March 2025).
- Ho Chi Minh City, Vietnam (May 2025).
- Rawang, Selangor, Malaysia (June 2025).
- Kuala Lumpur, Malaysia (June 2025).

Across all visits, the checklist confirmed 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 or 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.

### **Monitoring of Legislative Changes**

While no changes to the Act were identified during the reporting period, we continue to remain vigilant and prepared to adapt our processes in line with any future amendments or rules made under the Act.

## **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 the implementation 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 implementation 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.

## 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) To monitor any legislative changes to the Modern Slavery Act and adjust our processes accordingly. This may include certain process implementations such as a due-diligence system that meets the requirements in rules made under s25 of the Act, and an explanation of activities taken by us in accordance with that system in future Modern Slavery Statements, if deemed necessary.

The Board of 1884 Pty Ltd has approved this statement on 15<sup>th</sup> November 2025.

Signed by:

  
\_\_\_\_\_ (Name)

Chairman  
\_\_\_\_\_ (Position)