

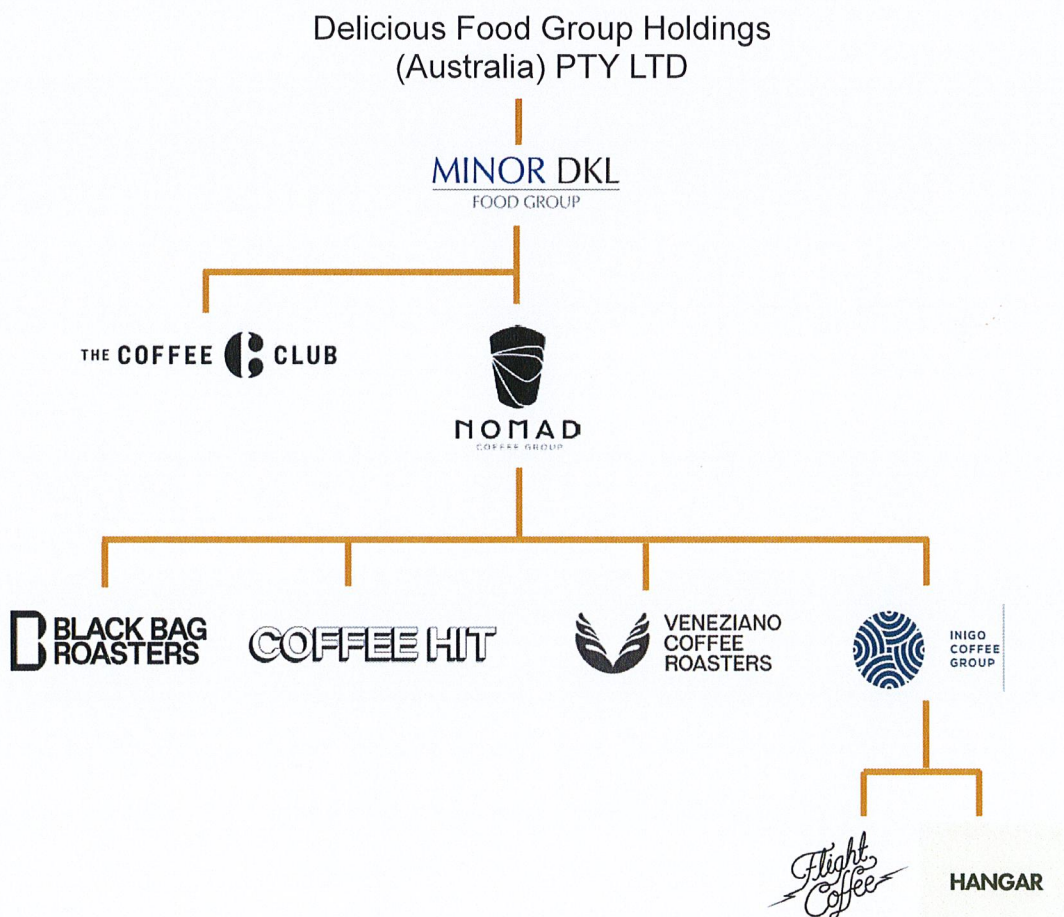
28 June 2024

**Delicious Food Holding (Australia) Pty Ltd ACN 127 320 183  
Modern Slavery Statement 2023**

This inaugural Modern Slavery Statement (**Statement**) is for Delicious Food Holding (Australia) Pty Ltd ACN 127 320 183 (**DFHA**), a private Australian entity and ultimate parent company with a consolidated revenue exceeding \$100 million during the reporting period 1 January 2023 to 31 December 2023 (**Reporting Period**).

As at the end of the Reporting Period, subsidiaries of DFHA included Minor DKL Food Group Pty Ltd (ACN 127 640 733) (**MDKL**), 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 '**DFHA Group**' (**DFHA Group**)).

This Statement is prepared for the Reporting Period as required by the *Modern Slavery Act 2018* (Cth) (**the Act**) and made by DFHA and the DFHA Group.



**1.0 About DFHA Group**

DFHA is the Australian parent entity for the DFHA 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 our majority ownership of MDKL gives us controlling interest and decision-making power for the purposes of the Act.

MDKL operates networks of stores across several Australian franchise brands focused on excellent coffee, food, and service to customers. As at the end of the Reporting Period, MDKL operated 404 sites across the following brands:

- The Coffee Club (241 Domestic and 154 International);
- Coffee Hit (4 Domestic);
- Veneziano Coffee Roasters (4 Domestic); and
- Flight Coffee NZ (1 International).

MDKL is headquartered in Brisbane and operated stores across Australia, New Zealand, Thailand, United Arab Emirates, Qatar, Saudi Arabia, Maldives, Indonesia, China, Seychelles, Vietnam, Cambodia, Laos and Singapore (**International Franchises**) as at the end of the Reporting Period. The International Franchises are operated by local Franchisees under a Master Franchise Agreement or Area Franchise Agreement and are responsible for the daily operations of their stores.

Operating for in excess of 34 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.

MDKL is also the controlling shareholder of NCG, a leading coffee manufacturing business, which includes brands such as, Veneziano Coffee Roasters, Coffee Hit and Sourced Coffee, as well as the Black Bag Roasters contract roasting division (3 Domestic; 1 International) and Flight Coffee in New Zealand.

This is the inaugural Modern Slavery Statement submitted by the DFHA Group addressing the mandatory reporting criteria set out in the Act (**Statement**). This Statement outlines our approach to Modern Slavery which has been in place for the Reporting Period, as well as prior reporting periods including for the period ending 31 December 2022. Unless specified, DFHA Group policies and procedures relating to our approach to Modern Slavery applied throughout the 2022 and 2023 reporting periods. This Statement specifically identifies any actions or initiatives that were introduced over the 2023 Reporting Period to address risks of Modern Slavery in our operations and supply chains. This Statement also identifies actions we have planned to address risks of Modern Slavery in subsequent reporting periods (the 2024 Reporting Period and beyond).

For further information about the DFHA Group, please refer to <https://minordkl.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 the DFHA Group and the corporate governance, policies, practices, and approach to Modern Slavery outlined in this statement applies equally and is common to the entities within the DFHA Group.

See Section 1.0 'About DHFA Group' for an outline of DHFA Group structure and operations.

Further details in relation to the policies and procedures by which we operate are detailed below at section 4.0.

Our franchise partners do not form part of the legal entities which comprise the DFHA 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 for the conduct of their businesses, with support provided by MDKL which includes store operational assistance, with 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 the areas of finance and property.

### 2.1.2 Workforce

Within the DFHA 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 2023, the DFHA Group directly employed 816 team members and 2 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	186
Part Time	75
Casual	555
Contractor	2
Visa Holders	112*

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

During the Reporting Period, DFHA Group's employees and contractors were based across the following locations:

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

Employees and contractors held positions in the following areas of DFHA 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.

We aim to be a responsible corporate citizen in the communities in which we operate, and we provide support to local communities through charitable contributions, volunteering time and providing financial support to community members. Examples of this this includes Café Smart (raising money for Australians experiencing homelessness), Special Childrens Christmas Party (a Christmas party held for children with disabilities and complex needs) and Women in Coffee Co-operative (an initiative to purchase coffee directly from women farmers) .

The DFHA Group supports its employees and contractors through our employment policies and procedures which comply with and are audited against Australian laws. All DFHA 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)*.

The DFHA Group ensures that every employee is familiar with our standards of conduct and ethical behaviour right from commencement of their employment. Our Code of Conduct, alongside our Discrimination and Equal Employment Opportunity policy, Grievance policy, and Whistle Blower policy are presented to 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 DFHA Group sets explicit expectations for employee behaviour, emphasising the importance of maintaining a safe and lawful workplace. It explicitly prohibits sexual harassment, bullying, and discrimination, ensuring a clear understanding of 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, 112 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 DFHA Group's supply chain covers the procurement of a range of goods and services including, but 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 DFHA 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 strictly comply with current regulations and our Code of Conduct.

### 3.0 Modern Slavery Risks

During the Reporting Period, the DFHA Group took steps to understand our exposure to Modern Slavery risks with respect to operations. The DFHA 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.

As an Australian business provider, we are also legally subject to Australia's high standards for governance, health and safety and legal protections for our employees.

To this end, and as at the end of the Reporting Period, the DFHA Group did not become aware of any instance of Modern Slavery in our operations or supply chain. As we refine our approach to Modern Slavery and commit to annual reporting through a Modern Slavery Statement, we also commit to reviewing Modern Slavery risks and further engaging with our supply chain partners for transparency to gain greater understanding of where risks lie in our suppliers' operations.

### 4.0 Addressing Modern Slavery Risks

#### 4.1 Actions taken by DFHA within Reporting Period

The DFHA Group is committed to addressing 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 it conducts its 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.

The DFHA Group recognises the complexity and nuance of our different business units that is present due to the size and locality of our supply chain. While food and food packing products comprise the corner stone of our procurement, there are a number of non-food items including equipment, small wares, uniforms and other non-direct materials. To understand these risks, we have analysed our supply footprint and our business operations against the Global Slavery Index 2023 and the following topics:

#### *Geographical Risk*

Although, wherever possible, our food and beverage are sourced locally, there are still a number of products imported within high-risk sectors, as outlined in the Global Slavery Index 2023, these include:

- Electronics;
- Garments/Uniforms; and
- Fish and seafood products.

#### *Sector Risk*

We recognise that specific industry sectors within Australia represent a higher-than-average risk of Modern Slavery, especially in transient workforces such as hospitality and construction, which have a higher percentage of migrant, backpacker and visa workforce.

#### *Procurement Size*

Lastly, where a large amount of spending is within a single category, as with coffee, which comprises a third of the total group spending per annum.

Although significant structure and emphasis have been put on decreasing the risk of Modern Slavery within our supply chain, we recognise that there is, and likely will always be, more to do in this space.

### **Mitigation of Modern Slavery Risks**

A number of actions have been taken to mitigate the risks of Modern Slavery to our business, including but not limited to:

- Code of Conduct Policy

This policy is the cornerstone of conducting business and working together to achieve our goals. The behaviour and characteristics set out in this policy are expected of every DFHA Group employee.

- Business Partners Code of Conduct Policy

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 DFHA Group, including their employees, agents, and representatives.

Majority, if not all Business Partners must receive a copy of this Code during the registration process and must ensure compliance throughout the contractual relationship with the DFHA Group. It is a precondition for commencement of the contract that our business partners review, and acknowledge (in writing) acceptance of the Code.

- Discrimination and Equal Employment Opportunity Policy

This policy outlines DFHA Group's commitment to offering a workplace that promotes Equal Employment Opportunities (**EEO**). EEO at the DFHA Group addresses the issue of discrimination and aims to ensure that everyone will have equal access to jobs, benefits and services and that the processes pertaining to all employment areas will be delivered fairly and equitably. As such, there will be a zero-tolerance approach to discrimination (Direct, Indirect, Victimisation, Vilification and Harassment) in the workplace.

- Whistleblower Policy

The DFHA 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. Our Whistleblower functionality also sits with an external third party provider, so as to ensure further protection for the complainant and mitigating any conflict risks.

The Whistleblower Policy outlines the disclosure process, the protections available to whistleblowers, and details how DFHA Group will provide support to investigate disclosures and ensure fair treatment of all whistleblowers.

We review the Whistleblower Policy in line with changes to legislation.

- 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 DFHA 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.

#### 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 this evolving concern and plan to implement a structured approach to reporting, as detailed below:

Task	Description
<b>Compliance Committee</b>	<p>A committee will be formed to ensure compliance, measurements, broader commitments as well as manage any changes that are required.</p> <p>This committee is made up of members from the following departments:</p> <ul style="list-style-type: none"> <li>• Legal;</li> <li>• Procurement;</li> <li>• Sustainability; and</li> <li>• Human Resources.</li> </ul>
<b>Business Partner Code of Conduct</b>	<p>A copy of the Business Partner Code of Conduct will continue to be provided to all business partners, who must agree to and sign the document before commencing or continuing a contractual relationship.</p>
<b>Whistleblower Policy and Channel</b>	<p>A policy designed to ensure that people can raise concerns about actual or suspected contraventions of ethical and legal standards and proper business practices without fear of reprisal, threats or victimisation.</p> <p>We will continue to develop and refine this policy to ensure all staff members are aware of their rights and ability to raise concerns about actual or suspected contraventions of ethical and legal standards. By doing so, we will ensure that all staff feel safe to report these concerns without the fear of reprisal, threats, or victimisation.</p> <p>Our Whistleblower channel can be accessed by calling the secure Whistleblower Services Line on 1300 408 955.</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>Digital Tool Investment</b>	<p>To aid in better recording of data, as well as data driven risk identification, investment into an</p>

Task	Description
	online platform such as SEDEX or similar is planned for the 2024 reporting period.
<b>Modern Slavery Training</b>	Over the next reporting period DFHA Group plans to implement comprehensive and compulsory Modern Slavery modules for all staff. For existing staff this will be within the next reporting period and for new staff, this will form part of their induction training.

## 5.0 Effectiveness

### 5.1 Effectiveness of Assessment

The DFHA Group is committed to implementing and enforcing effective systems, controls, and reviews to avoid exposure to Modern Slavery risks in our operations and in our upstream, and downstream value chains. The effectiveness of our business operations is within the scope of regular audits of operations.

The DFHA Group's commitment is demonstrated in our detailed obligations to mitigate Modern Slavery risks in operations arising from supply chain breaches. DFHA Group's effectiveness in addressing Modern Slavery risks is reflected through our Whistleblower Policy where employees are supported to report any actual or suspected wrongdoing, misconduct or unethical behaviour without fear of reprisal, intimidation or disadvantage. In the Reporting Period there were no whistleblower reports and no complaints relating to Modern Slavery performance in our operations or within our supply chains.

### 5.2 Actions Planned for Next Reporting Period to Assess our Modern Slavery Response

In future Reporting Periods, the DFHA Group intends to continue its improvement of addressing Modern Slavery risks and compliance. In order for the DFHA Group to achieve this, we will implement those actions detailed herein (refer to Item 4.2) in conjunction with the below:

- Consulting and engaging with our supply chain to analyse the effectiveness of our Business Partner Code of Conduct ;
- Introducing Modern Slavery training initiatives (see section 4.2), tracking completion statistics and monitoring year-on-year progress; and
- Continuing to integrate Modern Slavery risk identification and abatement into our internal governance system by continuing to update our internal company policies and procedures.

## 6.0 Process of Consultation

Consultation for the purposes of this initial statement has been undertaken by the DFHA Group, and reviews have been conducted by our Legal, Sustainability, Human Resources and Procurement teams.

Modern Slavery compliance will be addressed and managed by the following personnel:

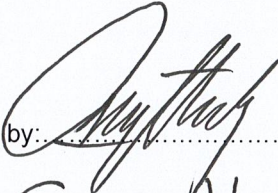
- General Counsel and Senior Legal Counsel (MDKL);
- General Counsel and Senior Legal Counsel (Minor Hotels);
- Human Resources Director (MDKL/NCG); and
- Group Sustainability Manager (MDKL/NCG).

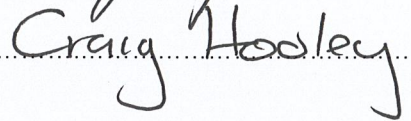
This statement has been reviewed by DFHA's Board of Directors.



## 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:  .....

Name:  .....

Chair

Delicious Food Holding (Australia) Pty Ltd

**Schedule 1 – DFHA Group Entities**

<b>Entity</b>	<b>ACN</b>
The Coffee Club Investment Pty Ltd ACN ( <b>TINV</b> )	128 563 217
The Coffee Club Pty Ltd ( <b>TCCP</b> )	010 866 369
The Coffee Club Unit Trust ( <b>TCCU</b> )	ABN 17 427 137 563
The Coffee Club International Pty Ltd ( <b>TINT</b> )	116 144 999
The Coffee Club (NZ) Pty Ltd ( <b>TCNZ</b> )	116 145 549
The Coffee Club (Korea) Pty Ltd ( <b>TCSK</b> )	116 145 524
The Coffee Club (Mena) Pty Ltd ( <b>TCMN</b> )	119 345 701
The Coffee Club Franchising Company Pty Ltd ( <b>TCCF</b> )	128 563 333
The Coffee Club Supply Pty Ltd ( <b>TCCS</b> )	617 383 570
First Avenue Company Pty Ltd ( <b>FAVE</b> )	134 383 574
Espresso Pty Ltd ( <b>ESPR</b> )	066 142 247
The Coffee Club (Properties) Pty Ltd ( <b>PRO1</b> )	066 111 742
The Coffee Club Properties (NSW) Pty Ltd ( <b>PRO2</b> )	105 313 657
The Coffee Club (NSW) Pty Ltd ( <b>PRO3</b> )	070 128 684
The Coffee Club (VIC) Pty Ltd ( <b>PRO4</b> )	070 128 666
BC Aus Operating Company Pty Ltd (External Administration) ( <b>BON</b> )	151 599 558
Minor DKL Management Pty Ltd ( <b>MGMT</b> )	600 187 255
Minor DKL Stores Pty Ltd ( <b>STOR</b> )	600 184 709
TCC Operations Pty Ltd ( <b>TCCO</b> )	600 187 657
TGT Operations Pty Ltd ( <b>TGTO</b> )	600 187 700
Minor DKL Constructions Pty Ltd ( <b>CONS</b> )	600 187 308
Nomad Coffee Group Pty Ltd ( <b>NCG</b> )	600 640 284
Veneziano Coffee Roasters Holdings Pty Ltd ( <b>VCRH</b> )	600 033 645
Veneziano Coffee Roasters Pty Ltd ( <b>VCRO</b> )	600 033 654
Black Bag Roasters Pty Ltd ( <b>BBCR</b> )	604 900 334
Veneziano Coffee Assets Pty Ltd ( <b>VCRA</b> )	603 045 209
Veneziano (SA) Pty Ltd ( <b>VSTH</b> )	135 118 697
Nitro Coffee Pty Ltd	601 662 006
Coffee Hit Holdings Pty Ltd ( <b>HITH</b> )	600 008 311
Coffee Hit Systems Pty Ltd ( <b>HITS</b> )	603 044 720
Coffee Hit Properties Pty Ltd ( <b>PRO7</b> )	603 044 766
Nomad Coffee Management Pty Ltd ( <b>VGCM</b> )	600 033 832

Inigo Montoya 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