16 November 2022

Dear Sir/Madam,

Saxon Agriculture Limited Modern Slavery and Human Trafficking Statement

Please find attached the GrainCorp Modern Slavery Statement for the period 1 October 2021 to 30 September 2022.

The Statement has been prepared in respect of GrainCorp Limited and the entities it owns or controls, that are reporting entities for the purposes of the Australian *Modern Slavery Act 2018 (Cth)* and also in respect of the reporting obligations of GrainCorp's UK based subsidiary, Saxon Agriculture Limited, under the UK *Modern Slavery Act 2015*.

This Statement has been reviewed and approved by the Board of Saxon Agriculture Limited

Yours faithfully.
Saxon Agriculture



Marcus Oldfield
Saxon Agriculture Limited
Director

GrainCorp

Modern Slavery Statement 2022



About this Modern Slavery Statement



About this Modern Slavery Statement

This Modern Slavery Statement covers the period 1 October 2021 to 30 September 2022 (**FY22** or **Reporting Period**) and is the third statement made in respect of GrainCorp Limited (ACN 057 186 035) and the entities it owns or controls, that are reporting entities for the purposes of the Australian Modern Slavery Act 2018 (Cth) (**Australian Act**). This Statement also serves as a Modern Slavery Transparency Statement in respect of our reporting obligations under the UK Modern Slavery Act 2015 (**UK Act**). A comparison of the Australian Act and UK Act recommended reporting requirements, and how GrainCorp has addressed these requirements is at Appendix A.

The companies covered by this Statement are:

Australia

- GrainCorp Limited (ACN 057 186 035);
- GrainCorp Services Limited (ACN 050 099 146);
- GrainCorp Operations Limited (ACN 003 875 401);
- GrainCorp Commodity Management (Holdings) Pty Ltd (ACN 000 013 123);
- GrainCorp Oilseeds Pty Ltd (ACN 006 772 578);
- GrainCorp Commodity Management Pty Ltd (ACN 107 971 095);
- GrainCorp Oils Holdings Pty Ltd (ACN 160 256 057); and
- GrainCorp Foods Australia Pty Ltd (ACN 160 258 677).

United Kingdom

- GrainCorp Europe (UK) Limited (CRN 07626308); and
- Saxon Agriculture Limited (CRN 03599544),

(referred to together as **GrainCorp** in this Statement).

Acknowledgement of country

GrainCorp acknowledges Aboriginal and Torres Strait Islander peoples as the First Peoples of Australia and embraces the spirit of reconciliation, working towards the equality of outcomes and ensuring an equal voice.

In this Statement

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Our Vision

To lead sustainable and innovative agriculture through another century of growth

Our Purpose

Proudly connect with customers and rural communities to deliver value through innovation and expertise

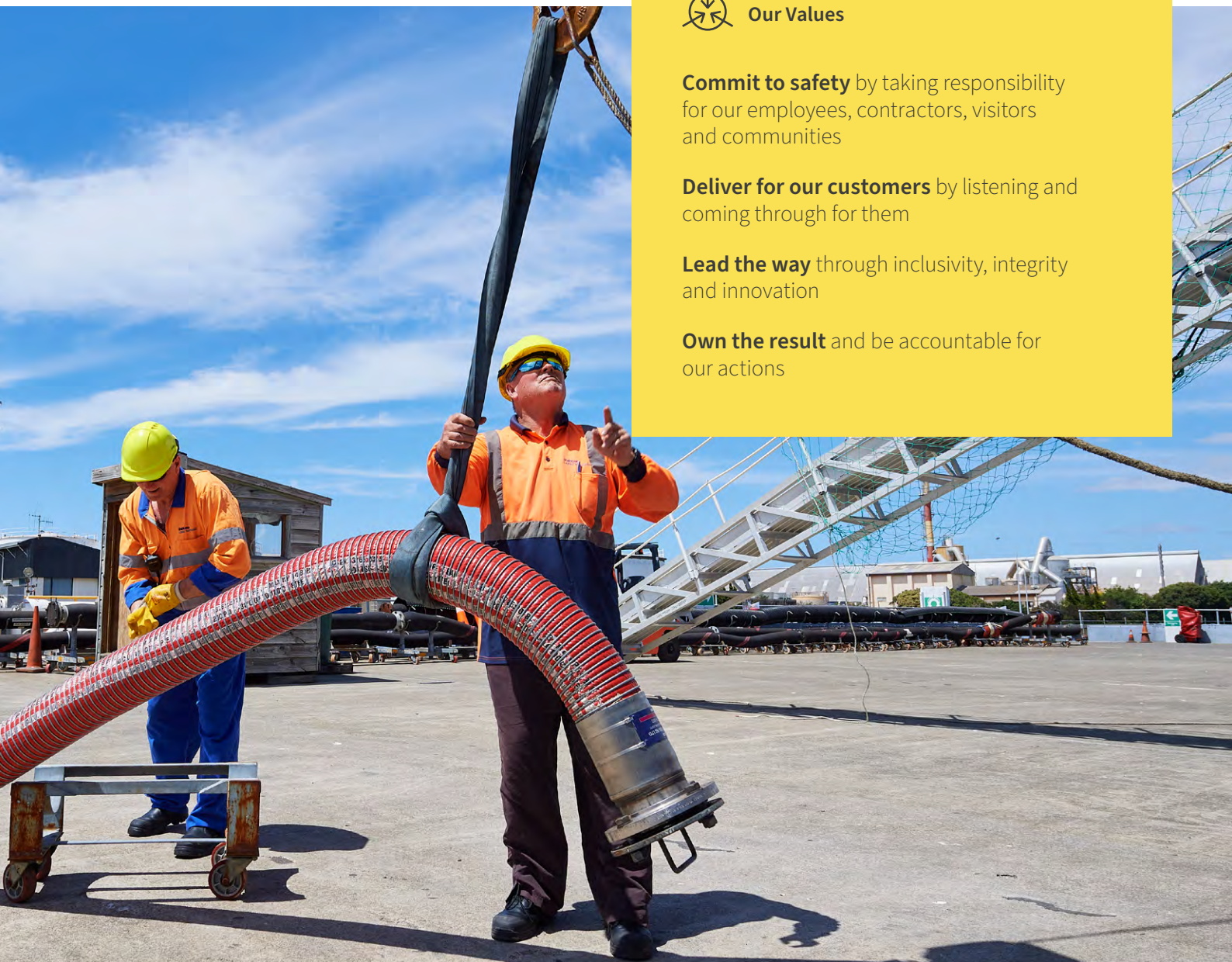
Our Values

Commit to safety by taking responsibility for our employees, contractors, visitors and communities

Deliver for our customers by listening and coming through for them

Lead the way through inclusivity, integrity and innovation

Own the result and be accountable for our actions



Managing Director and CEO's Statement

Respect for human rights is fundamental to our values, the long-term stability and growth of our business, and to the wellbeing of the communities in which we operate.

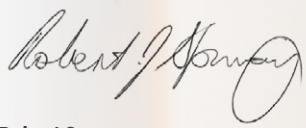
At GrainCorp, this means doing business in a way that acknowledges and respects the rights of our people, customers, suppliers and contractors, to be free from practices of modern slavery, including forced labour, human trafficking and child labour.

In FY22, GrainCorp continued to embed our approach to identifying and addressing Modern Slavery in our supply chain. Key highlights include:

- elevating Human Rights, as part of our overall ESG governance, to Board level, through the establishment of a new Board Sustainability Committee.
- publishing a new Human Rights Position Statement to publicly commit to respecting internationally recognised human rights as set out in the Universal Declaration of Human Rights, and the fundamental principles and rights at work as outlined in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.
- expanding our membership of Sedex to connect with our suppliers and better understand Modern Slavery risk in our supply chain, with a particular focus on our palm oil suppliers.
- evaluating our Supplier Code of Conduct against industry best practice to identify improvement opportunities that have been incorporated into a new Supplier Code of Conduct for progressive roll-out in FY23.
- conducting a Sedex Member Ethical Trade Audit ('SMETA') over our Numurkah, Victoria, Foods processing plant, completing the review of our three primary Foods processing facilities in Australia and New Zealand with no labour standard non-conformances identified.

In FY23, GrainCorp will continue to assess our supply chains to identify inputs deemed high-risk and develop appropriate sourcing policies and protocols, and I look forward to sharing our ongoing progress in future Modern Slavery Statements.

This Statement has been reviewed and approved by the Board of GrainCorp Limited in its own capacity and on behalf of the entities that GrainCorp Limited owns or controls that are reporting entities for the purposes of the Act.



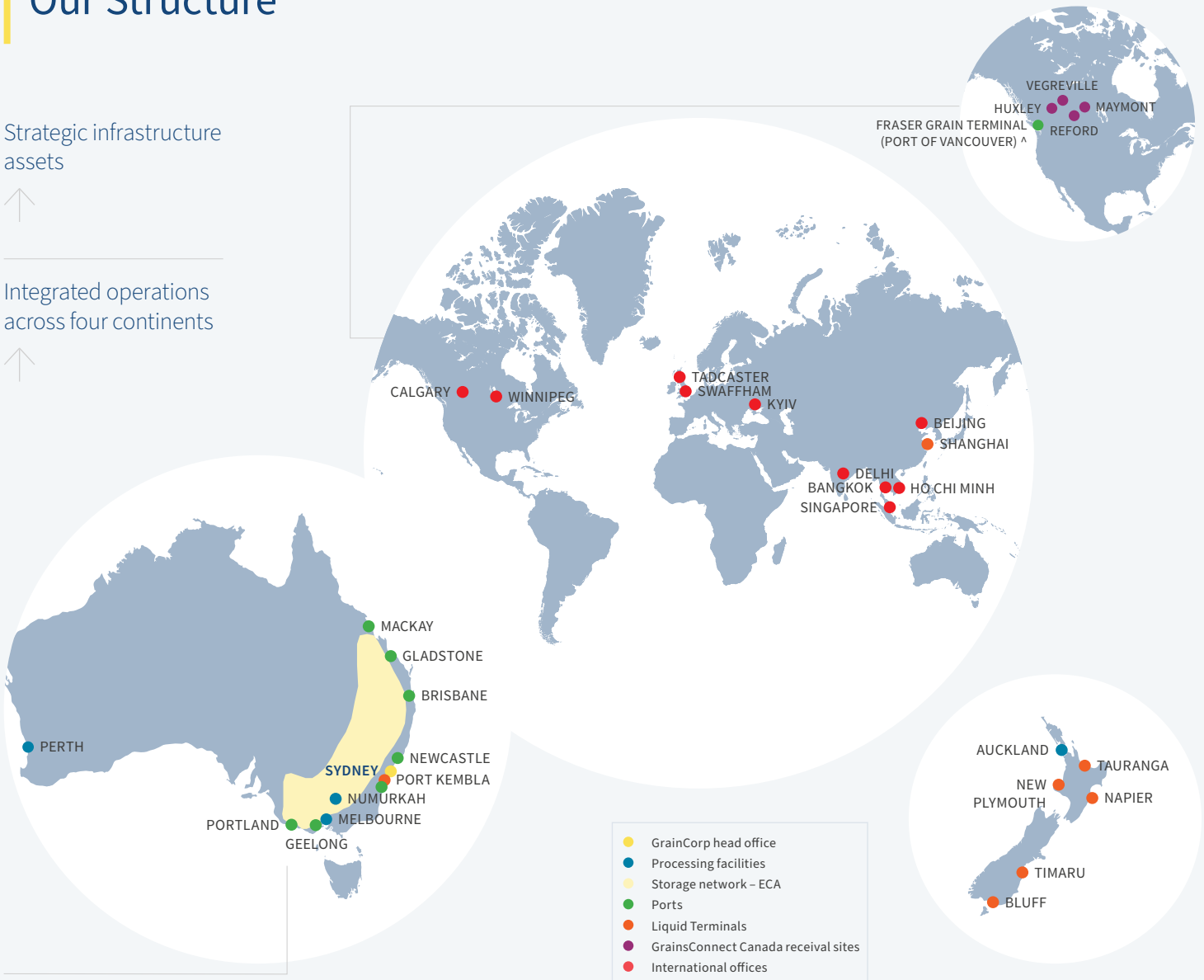
Robert Spurway
Managing Director & CEO
16 November 2022



Our Structure

Strategic infrastructure assets

Integrated operations across four continents



We have the largest regional accumulation, storage and handling network on the east coast of Australia.

See our network map
grains.graincorp.com.au/locations/

^ GrainsConnect Canada joint venture with Parrish & Heimbecker.

GrainCorp Limited is a public company, listed on the Australian Securities Exchange. We are a diversified Australian agribusiness, with integrated operations spanning four continents and a proud history of delivering for our customers for more than 100 years.

GrainCorp employs ~1,828 people across Australia, New Zealand, United Kingdom, Canada, Ukraine, Singapore, India, China, Thailand and Vietnam. Our operations are primarily conducted through our consolidated Group of companies, including Saxon Agriculture in the UK.

In Canada, GrainCorp also own supply chain assets connecting growers in the Prairies to international customers via the port of Vancouver through GrainsConnect Canada, GrainCorp's 50–50 joint venture with Zen-Noh Grain Corporation.

GrainCorp has acted in consultation with the GrainCorp group subsidiaries covered by this Statement which it controls, are fully consolidated entities of the Group, and whose revenue exceeds the reporting threshold in FY22. GrainCorp's operations described in **Our Operations** below have been mapped to our GrainCorp group subsidiaries covered by this statement at Appendix B.

Our Operations

GrainCorp partners with growers to maximise the value of their crops, connecting them to domestic and global marketplaces through our end-to-end supply chain and infrastructure assets. We develop innovative solutions to create high quality and sustainable products across the food, feed and industrial sectors.

East Coast Australia (ECA)

GrainCorp's ECA business is an integrated grain storage and handling network spread across the states of Queensland, New South Wales and Victoria, comprising over 160 regional receival sites and seven bulk port terminals. Principal activities involve purchasing, storing, transporting, and selling agricultural commodities while managing risk across the value chain. For transportation services, we either lease the road/rail assets or contract with third parties. The main commodities that we handle are wheat, barley, canola, chickpeas and sorghum. We also utilise our port terminals to import/export bulk materials including woodchips, fertiliser, sand, sugar and cement.

GrainCorp acts as both an owner/marketer of commodities and as a third-party service provider through its asset ownership. For the provision of services, GrainCorp charges fees at various stages of the supply chain, for receival, out-loading, storage, transport, blending, port booking and vessel loading. Where GrainCorp is marketing grain or oilseeds to a customer, it takes a position to seek to capture a margin between prices paid to growers and prices received from customers. Derivatives are used to hedge long and short positions.

Revenue and profits in grain marketing are subject to variability in grain production, prices, the position taken and risk management processes. Ownership of supply chain infrastructure is a competitive advantage as it enables GrainCorp to reliably source supply, provide customers with consistent quality, manage logistics more effectively, and have coordinated access to storage facilities.

International

GrainCorp's International business originates grain and oilseeds from regions outside of ECA – i.e. South Australia, Western Australia, South America, Ukraine, Canada and United Kingdom – and connects these commodities to customers in 50+ countries. A core objective for the business is to have diversity of supply, which enables GrainCorp to service its customers reliably on a year-round basis.

The International business utilises GrainCorp supply chains where possible, and in some jurisdictions it utilises third-party storage, handling and transportation infrastructure to connect grain to customers.

GrainCorp's UK business, Saxon Agriculture, specialises in the trade, import and export of cereals, oilseeds and pulses and is a supplier of arable seeds and organic agriproducts in the UK.

Feeds, Fats & Oils

FFO comprises several businesses across the animal feed and fats & oils/agri-energy sectors in Australia and New Zealand.

In Australia, GrainCorp's Feeds business manufactures and supplies molasses-based feed supplements and vegetable oil to enhance farm productivity in beef cattle, sheep, dairy cattle and other domestic livestock. Its brands include Molafos, Rumifeed and Energro, as well as crude Molasses and Dry Feeds. In New Zealand, it sources local and imported feeds/ingredients to offer a range of liquid, in-shed, bulk dairy and calf feeds.

GrainCorp's 'Fats & Oils' (agri-energy) business involves the procurement, shipping, accreditation and value-added supply of tallow, vegetable oils and Used Cooking Oil (UCO). GrainCorp owns six bulk liquid terminals in New Zealand, Australia and China, and has strategic long-term access across multiple other sites in Australia. GrainCorp's Auscol business also operates six UCO collection sites in Australia.

Customers in this segment include fuel producers/refiners, quick service restaurants, industrial businesses and food manufacturers.

Oilseeds

GrainCorp's Oilseeds business sources canola seed from growers and accumulators in Australia to crush and create products including crude degummed oil, refined bleached oils and canola meal. GrainCorp's oilseeds products are used in cooking oils, spreads and shortenings, prepared foods, meal for dairy, poultry and livestock, cosmetics and lubricants, fuels and other industrial applications.

A key driver of earnings for the Oilseeds business is the crush margin, which is an aggregation of the revenue received for the oil and meal outputs minus the cost of the oilseed. The crush margin fluctuates depending on a range of factors, including the volume of Australian canola production (which impacts the cost of the oilseed), the volume of global production of canola and other oilseeds, and global and domestic demand for vegetable oils and canola meal.

Foods

GrainCorp Foods produces a range of edible oils, infant nutrition, bakery margarines, spreads and shortening products at its three processing facilities in Victoria and Auckland, New Zealand.

Customers range from multi-national and regional retail-branded food manufacturers to global quick service restaurants and family-owned local bakeries and hospitality outlets. GrainCorp's product range includes vegetable spreads, premium cooking oil, pastry margarine, and bulk deliveries of blended oils.

Over the past decade, Australian grown canola oil has become the oil of choice for many of GrainCorp's Foods customers, with the trend becoming more pronounced in 2022 as certain customers chose to de-risk their exposure to overseas supply chains, switching from imported sunflower oil to local canola oil.

Further details on GrainCorp's business, operating structure and joint ventures are outlined in our 2022 Annual Report, which is available via **graincorp.com.au**

Our Supply Chains



GrainCorp's supply chains include the storage, transportation and processing of grains and oilseeds. They also facilitate the import and export of a range of commodities which are ingredients or other inputs in our value-added manufacturing operations or those of our customers.

GrainCorp procures a broad range of goods and services from several thousand suppliers across its operating regions of Australia and New Zealand, Canada, the UK and Ukraine.

The main goods and services we source are:

- Commodities from broadacre agriculture including grain and oilseeds (canola)
- Other commodities such as oils (palm, coconut, sunflower, soybean), tallow and UCO (Used Cooking Oil)
- Variable labour to supplement the needs of the permanent workforce where we do not have an ongoing or fixed need for the labour, supplied through third-party employment agencies
- Logistics (third-party logistics warehouses, road, rail and ocean freight)
- Packaging and ingredients
- Grain handling and food manufacturing equipment
- Plant and equipment maintenance services including consumables, chemicals and processing aids
- Bunker consumables (tarpaulins, fumigants)
- Personal protective equipment, including clothing and footwear
- Office-based support and equipment including IT hardware and systems, stationery, and cleaning services.

Identifying our Modern Slavery Risk

GrainCorp continues to consider modern slavery risks and the potential for the company (or its controlled entities) to cause, contribute or be directly or indirectly linked to modern slavery through our operations and supply chains on an ongoing basis.

Risk is inherent in GrainCorp's daily operations and the ability to achieve our goals depends heavily on how effectively risk is managed. GrainCorp's risk management objective is to ensure all material risks are identified and measures are implemented to mitigate or otherwise manage those risks.

In the context of GrainCorp's objective to protect human rights in our operations and supply chain, and act ethically and with integrity in all business dealings, our approach to identifying modern slavery risk is integrated into our systematic approach to risk management.

GrainCorp has commenced building an ESG Supplier Risk Assessment methodology to assess risks in our supply chain and identify the areas for immediate focus. The methodology assesses the product or service, operating location and supplier-specific information to form a risk rating.

The methodology considers ESG risks relating to modern slavery, labour standards, health and safety, business ethics and environmental impacts using a range of globally recognised insights as a reference point for the risk assessment including the UN Human Rights Index, the Walk-Free Global Slavery Index and the Sedex Radar tool. As our responsible sourcing program develops, we will continue to refine and improve this screening process.

In FY22, there were no material changes to GrainCorp's operations and our exposure to modern slavery risk remains unchanged from the prior year, with a low risk of directly causing or contributing to modern slavery practices through our operations.

Sedex

Sedex is a membership organisation that provides one of the world's leading online platforms for companies to manage and improve working conditions in global supply chains. They provide practical tools to help companies improve their responsible and sustainable business practices, and source responsibly.

The following potential risks have been identified in our supply chains:

Vulnerable populations

Use of unskilled or temporary seasonal labour. For example, peak harvest periods and general agricultural harvest activities may involve higher risk of modern slavery practices in GrainCorp's supply chains.



Product and service categories

Cost pressures or delivery timeframes may have an unintended consequence of influencing suppliers to compromise on their labour conditions. Areas such as international logistics may be subject to such pressures.



Geographies

Operating or maintaining relationships with suppliers in countries and industry sectors with reported evidence of human rights violations. The palm oil and textiles industry are two relevant sectors with higher risk of human rights violations.



Further details on GrainCorp's risk management framework are outlined in our Corporate Governance Statement
graincorp.com.au

Policy and Governance

Our Human Rights Position Statement, Code of Conduct and Supplier Code of Conduct together outline our commitments and expectations of suppliers when conducting business with GrainCorp and align with our values to ensure that we observe the highest standards of fair dealing, honesty and integrity in our business activities.

Human Rights Position Statement

GrainCorp's Human Rights Position Statement outlines our commitment to respecting internationally recognised human rights as set out in the Universal Declaration of Human Rights.

We respect the fundamental principles and rights at work as outlined in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work. These include freedom of association and the right to collective bargaining, the elimination of forced or compulsory labour and the elimination of discrimination in respect of employment and occupation.

We are progressively implementing effective systems and controls to understand, manage and minimise instances of modern slavery and human rights risks within our business and supply chain.

The steps we are taking include:

- Continued compliance with all applicable laws
- Embedding communication and training tools for our people and key stakeholders
- Implementing modern slavery risk assessment and management processes within our operations and supply chain and assessing the risks associated with our suppliers
- Implementing (and continuing to enhance) a Supplier Code of Conduct outlining the standards and principles we expect our suppliers to adhere to when conducting business with GrainCorp
- Delivering public reporting under the Australian Modern Slavery Act (Cth) 2018 and the UK Modern Slavery Act (2015)

Our policies and statements on key human rights aspects include but are not limited to:

- Code of Conduct
- Human Rights Position Statement
- Supplier Code of Conduct
- Palm Oil Position Statement
- Group Whistleblower Policy
- Privacy Policy
- Diversity & Inclusion Policy
- Preventing Harassment and Bullying in the Workplace Policy

We expect everyone who works at GrainCorp, including employees, directors and contractors, to understand, respect and uphold human rights within our business. Our Supplier Code of Conduct outlines the standards and principles we expect of suppliers with respect to human rights.

The Human Rights Position Statement also sets out the following reporting mechanisms for grievances available to our people, contractors and commercial partners:

- **Human Rights Mailbox**

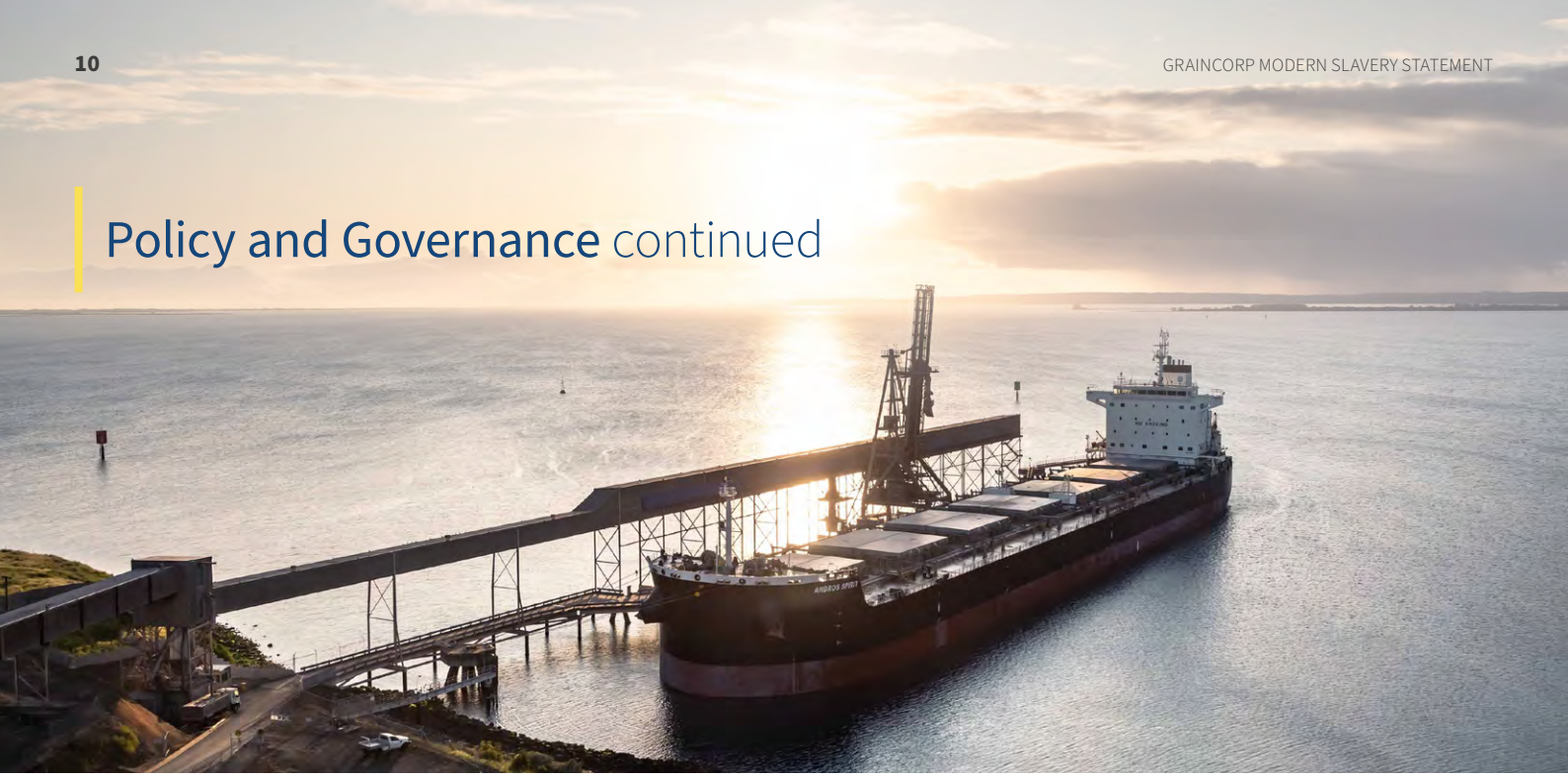
  GrainCorp has established a mechanism whereby human rights grievances or concerns are able to be raised. Our people, contractors and commercial partners can access this mechanism by contacting GrainCorp at **humanrights@graincorp.com.au** or by phone **+61 2 9325 9108.** These contact details are contained in GrainCorp's Human Rights Position Statement which is publicly available on the Corporate Governance section of our website: **graincorp.com.au**

  The mailbox is monitored daily by GrainCorp's Compliance Unit and investigations are undertaken as required.

- **Whistleblower**

  GrainCorp has a dedicated Whistleblower hotline (FairCall) which is available to GrainCorp's employees and those within our extended supply chains. Individuals can confidentially report breaches of any GrainCorp policy they may have observed or experienced, including concerns relating to modern slavery practices. GrainCorp's Whistleblower Policy and contact details are available on the Corporate Governance section of our website: **graincorp.com.au**

Policy and Governance continued



GrainCorp Code of Conduct

GrainCorp's Code of Conduct is founded on a set of defined values which guide how all GrainCorp employees should behave toward each other, our customers, other relevant stakeholders, the community and our environment. The Code of Conduct naturally requires compliance with all laws, and also goes beyond that, requiring our employees to hold themselves to the highest standard of personal and professional ethical behaviour. The Code of Conduct is approved by the Board of GrainCorp.

Every employee in GrainCorp is required to complete Code of Conduct training at the commencement of their employment. The training is delivered via an online e-module, or in a face-to-face setting. The training program is administered by GrainCorp's Learning & Development team and is part of a broader group of induction training modules.

GrainCorp's Code of Conduct is available on GrainCorp's website: **graincorp.com.au**

Supplier Code of Conduct

We released a supplier code of conduct in March 2021 that requires our suppliers to comply with legal requirements, industry standards and have systems in place to manage key ESG risks. The existing code is embedded in key legal contracts and provides solid foundations for responsible sourcing.

The GrainCorp Supplier Code of Conduct outlines the standards and principles that we expect our suppliers (and a supplier's direct suppliers) to adhere to when conducting business with GrainCorp. When suppliers do business with GrainCorp, and this code is part of our dealings, we expect them to:

- Comply with all relevant and applicable laws and regulations in the countries within which they operate;
- Endeavour to meet international and industry guidelines, standards and best practice; and
- Implement systems, processes and controls to:
  - Protect the environment
  - Respect human rights
  - Prohibit modern slavery labour practices
  - Prohibit child labour
  - Ensure reasonable working hours and wages
  - Provide a safe working environment
  - Act lawfully and with integrity
  - Adequately manage grievances

The Supplier Code of Conduct includes the right to investigate and audit a supplier's conduct and compliance in certain circumstances. In the event that we identify, or are made aware of, an incidence of modern slavery practices or human rights violations, we will engage the supplier's senior management to develop a remediation plan, or in serious cases, may suspend dealings.

In FY22, we evaluated our code against industry best practice and identified improvement opportunities that have been incorporated into a new Supplier Code of Conduct. This review of best practice also identified the need to continue to grow internal capability regarding responsible sourcing as well as the need to develop a detailed supplier engagement plan, to roll out an enhanced supplier code of conduct and drive positive outcomes in our supply chain.

Due Diligence and Risk Management

Supplier Due Diligence

For the onboarding of new suppliers, GrainCorp has a risk-based due diligence approach to modern slavery risk that is aligned with our Anti-Bribery & Corruption (ABC) procedures. Certain 'Defined Risk Criteria', including but not limited to source location and category of spend (for example, freight services, packaging and ingredients), form the basis for determining the requirement for due diligence, under three categories – Simple Due Diligence, Regular Due Diligence and Heightened Due Diligence.

Risk Identification, Mitigation and Remediation

During the reporting period, GrainCorp continued to implement policies and update due diligence procedures to assist in addressing the modern slavery risks associated with our operations and supply chains. **Palm Oil** has been identified as our highest risk exposure to modern slavery risks due to the combination of geographic and industry/sector exposures. In FY22, GrainCorp has also focused attention on understanding our modern slavery risk exposure in the following industry/sectors risk factors outlined in the **Identifying our Modern Slavery Risk** section above: **Ocean Freight**, **Variable Labour**, and **Clothing and Footwear**.

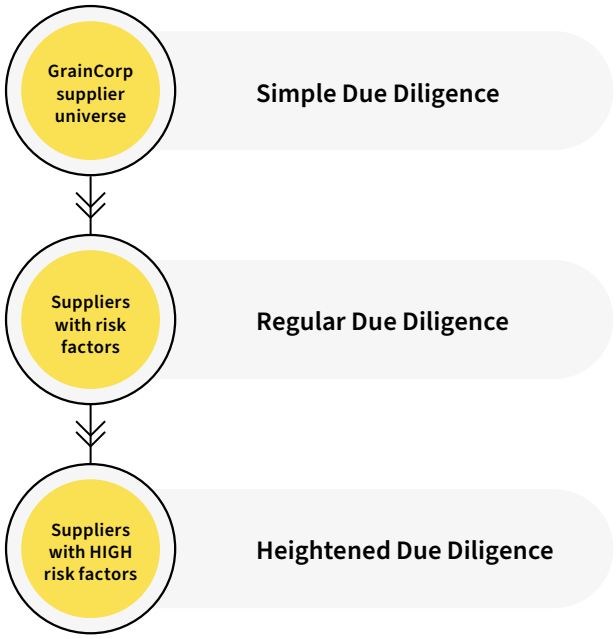
Palm Oil

GrainCorp purchases palm oil for use in GrainCorp products and in the products we produce on behalf of our customers. The palm oil industry uses unskilled migrant labour in regions that are high-risk areas for human rights violations.

GrainCorp has been a member of the Roundtable on Sustainable Palm Oil **(RSPO)** since 2013 and our three food processing sites (West Footscray and Numurkah in Australia, and East Tamaki in New Zealand) hold RSPO certification. GrainCorp only sources palm oil from RSPO certified suppliers. In addition, our palm oil suppliers are subject to heightened due diligence and regular monitoring, including through Sedex Member Ethical Trade Audits **(SMETA)**.

During FY22, GrainCorp:

- embedded our expanded membership of Sedex and established a corporate structure within the system to allow for each part of our business to connect with our suppliers.
- commenced connecting with our high-risk palm oil suppliers in the platform.
- developed process for tracking SMETA results.



Roundtable on Sustainable Palm Oil

The RSPO is a not-for-profit organisation that develops and implements global standards for sustainable palm oil to help minimise the negative impact of palm oil cultivation. The RSPO has established principles and criteria to achieve desired outcomes, including principles targeting upholding human rights, and provision of safe and decent work. To achieve RSPO certification, compliance with all RSPO principles is required. More information regarding RSPO certification can be found at the RSP website: **rspo.org**



Image: https://rspo.org

Due Diligence and Risk Management continued

Ocean Freight

International shipping providers are susceptible to labour rights violations due to a number of factors. Ocean freight workers are potentially sourced from vulnerable populations (e.g. from countries with poor track records on human rights). The involvement of multiple parties in the ocean freight contracts increases the risk of inconsistent labour standards and lack of oversight to ensure compliance with human rights obligations. Cost pressures or delivery timeframes potentially influence suppliers to compromise on their labour conditions.

- **International**

  As a critical component in our integrated supply chain, GrainCorp uses third-party industry due diligence sources to vet counterparties, ship owners, ship managers and the shipping vessels themselves to mitigate operational, financial and ethical conduct risks. These checks enable GrainCorp to identify red flags indicating potential non-conformance with labour standards prior to engaging ships for the transport of our produce and products. In addition, GrainCorp seeks to engage only with vessels crewed by labour protected by industry accepted bargaining agreements.

- **Feeds, Fats and Oils**

  GrainCorp enters contracts of affreightment for the carriage of animal fats and vegetable oils. At the time of contracting, GrainCorp undertakes due diligence as to the suitability of the vessel operator. All vessels chartered by the Feeds, Fats and Oils business operate in and out of Australia and New Zealand ports and are subject to Australian Maritime Safety Authority and Maritime New Zealand compliance monitoring procedures including adhering to the Maritime Labour Convention which sets out seafarers' rights at work, including employment terms, health and safety, living and working conditions, access to medical care and social security.

No material non-compliance events with ocean freight suppliers were identified during the reporting period.

Variable Labour

During peak harvest periods, GrainCorp engage variable labour to supplement the needs of the permanent workforce where we do not have an ongoing or fixed need for the labour. Most of our variable labour workforce is hired directly. However, where required, we also procure variable labour through preferred supplier third-party employment agencies and other agencies as required.

GrainCorp has confirmed that our preferred third-party agencies have implemented modern slavery policies and risk management frameworks to identify and address modern slavery risk in their workforce.

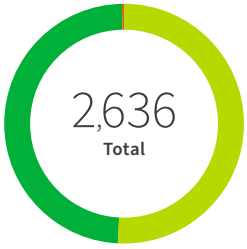
In FY23, GrainCorp will continue to engage with our preferred supplier, and other supplementary suppliers of variable labour, to better understand the risk of modern slavery in our supply chain and the effectiveness of the frameworks in managing those risks.

Clothing and Footwear

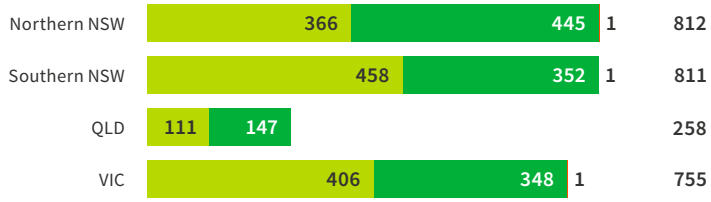
GrainCorp purchases industrial workwear and corporate uniforms through a preferred supplier. Our preferred supplier has an established Ethical Sourcing Policy and requires their suppliers (GrainCorp's Tier-2 suppliers) to sign and agree to their Ethical Sourcing Policy. Where these Tier-2 suppliers have factories based in higher-risk jurisdictions, our preferred supplier requests ethical-trade audits to assess the risk of modern slavery in their supply chain.

In FY23, GrainCorp will continue to engage with our preferred supplier, and other supplementary suppliers of clothing and footwear, to better understand the risk of modern slavery in our supply chain and the effectiveness of the frameworks in managing those risks.

Harvest casual workforce – snapshot[1]



Female	1,341
Male	1,292
Non-Binary	3



1. Data taken at 30 November 2021 to reflect GrainCorp's harvest casual workforce composition at a time of peak harvest operations.

Assessing the Effectiveness of Our Actions

2022 Achievements

- Modern slavery e-Learning module allocated to over 611 permanent employees across all our operating locations with a 94.6% completion rate
- 45% (vs. 34% in FY21) of suppliers to our food processing business have signed up to our Supplier Code of Conduct. Another 22% have provided codes and/or policies of their own which are aligned to the GrainCorp Code
- SMETA completed over one foods processing facility in FY22. All three of our foods processing facilities have now been reviewed within the last three years. No non-conformances with labour standards identified
- One SMETA and one follow-up audit completed in FY22 across one of our Palm Oil suppliers. The SMETA found two non-conformances with Working Hours SMETA criteria. See *Key Performance Indicators* for more information
- Five SMETA conducted in the past 3 years across three of our current 14 Palm Oil suppliers. Three non-conformances with labour standards remediated and two pending auditor review. No instances of modern slavery identified



During the reporting period, GrainCorp continued to implement a modern slavery risk management framework. Key achievements in FY22 are outlined below and the effectiveness of our actions will continue to be monitored as the framework is further embedded in FY23.

2023 Priority Actions

- Continue our comprehensive assessment of all procured goods and services to identify those deemed high-risk and develop appropriate sourcing policies and protocols
- Conduct due diligence activities on all high-risk suppliers
- Expand ESG supplier risk assessment to include Tier 2, Tier 3 and beyond, for commodities with specific and significant Human Rights impacts
- Commence implementation of new Supplier Code
- Establish a Modern Slavery Remediation Plan to guide our response to identified non-conformances with labour standards and indicators of modern slavery
- Expand our SMETA across key operational sites beyond our food processing facilities

Assessing the Effectiveness of Our Actions continued

GrainCorp has developed key performance indicators (KPIs) to measure how effective our actions have been to identify and address modern slavery practices in our operations and supply chains:

KPI	Performance	Commentary
Modern slavery training completion rates	94.6%	Modern slavery training is allocated to permanent employees with responsibilities for managing our people and/or procurement responsibilities.
Percentage of GrainCorp's key operational sites covered by a SMETA completed within last 3 years	100%	Key operating sites are defined as our three food processing sites: West Footscray and Numurkah (Australia) and East Tamaki (NZ). In FY23, we intend to undertake a modern slavery risk assessment to identify other key operational sites to be subject to SMETA.
Percentage of high-risk suppliers signed up for our Supplier Code of Conduct (or have an equivalent Code of Conduct of their own) and covered by a SMETA completed within the last 3 years	43% of our high-risk suppliers have signed up for our Supplier Code of Conduct (or have an equivalent Code of Conduct of their own) 21% of our high-risk suppliers have been covered by a SMETA in the last 3 years	In FY22, high-risk suppliers are defined as those supplying palm oil to GrainCorp due to their exposure to multiple risk factors as outlined in the Due Diligence and Risk Management section.
Number of non-conformances identified in SMETAs not resolved within agreed timeframes	2	2 SMETA non-conformances outstanding against 1 high-risk supplier relating to Working Hours. The non-conformances do not meet the definition of modern slavery. However, GrainCorp will continue to monitor completion of the corrective action plan.
Number of modern slavery complaints reported through our grievance reporting mechanisms	0	

We will continue to review and enhance our KPIs and develop further metrics to assess the effectiveness of our actions, in line with continuous improvement.

Future Actions

GrainCorp is committed to further developing its modern slavery risk program as part of our broader approach to responsible sourcing. We intend to continue to expand our understanding of modern slavery risks and mitigation options in our supply chain and strengthen our human rights risk management framework.

For the coming year, our focus will be to continue to embed our comprehensive assessment of all inputs to identify those deemed high-risk and develop appropriate sourcing policies and protocols, conduct due diligence activities on all high-risk suppliers, expand ESG supplier risk assessment to include Tier 2, Tier 3 and beyond, for commodities with specific and significant Human Rights impacts, and develop detailed supplier engagement plan to roll out our enhanced Supplier Code of Conduct.

GrainCorp's Sustainability Report is available on GrainCorp's website:
graincorp.com.au

In addition, GrainCorp will be establishing a plan for 2023 and beyond, aligned with our sustainability roadmap outlined in GrainCorp's 2022 Sustainability Report, to continuously improve our activities to address modern slavery risks in our supply chain and ensure a more comprehensive approach to human rights matters.



Consultation with Controlled Entities

GrainCorp's Modern Slavery Statement has been prepared with input from an organisation-wide working group tasked with understanding our obligations, shaping our policies and procedures and developing training.

GrainCorp's Risk and Assurance team has provided updates to the Board of Directors of GrainCorp and relevant sub-committees.

GrainCorp's UK-based subsidiary, Saxon Agriculture Limited, has also been consulted and information has been incorporated into this Modern Slavery Statement to meet its obligations under the UK Act.



Appendix A – Australian and UK Modern Slavery Statement Comparison

The sections of the Statement that specifically address what we have done to meet the core mandatory criteria required by the Australian Modern Slavery Act 2018 (Cth) are outlined below. The table also shows the Statement's alignment with recommended reporting criteria for UK Modern Slavery Act 2015 statements.

Australian Modern Slavery Act mandatory reporting criteria	UK Modern Slavery Act recommended reporting criteria	Modern Slavery Statement Section
Identify each reporting entity covered by the joint statement	The organisation's structure, its business and its supply chains	About this Modern Slavery Statement
Describe the structure, operations and supply chains of each reporting entity covered by the joint statement		Our Structure Our Operations Our Supply Chains
Describe the risks of modern slavery practices in the operations and supply chains of each reporting entity covered by the joint statement and any entities that each of those reporting entities owns or controls	Parts of the organisation's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk	Identifying our Modern Slavery Risk
Describe the actions taken by each reporting entity covered by the joint statement and any entities that each of those reporting entities owns or controls to assess and address these risks, including due diligence and remediation processes	Policies in relation to slavery and human trafficking	Policies and Governance
	Due diligence processes in relation to slavery and human trafficking in the organisation's business and supply chains	Due Diligence and Risk Management
	Training and capacity building about slavery and human trafficking available to the organisation's staff	Assessing the Effectiveness of Our Actions
Describe how each reporting entity covered by the joint statement assesses the effectiveness of actions being taken to assess and address modern slavery risks	Organisation's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate	Assessing the Effectiveness of Our Actions
Describe the process of consultation with each reporting entity covered by the joint statement and with any entities that each of those reporting entity owns or controls		Consultation with Controlled Entities
Any other relevant information		

Appendix B – Our Structure mapped to Our Operations

The table below maps the GrainCorp group subsidiaries covered by the Statement to Our Operations as described in the relevant section above:

Company	Country of Incorporation	Our Operations
GrainCorp Services Limited (ACN 050 099 146)	Australia	East Coast Australia International Oilseeds Feeds, Fats and Oils
GrainCorp Operations Limited (ACN 003 875 401)	Australia	East Coast Australia International Oilseeds Feeds, Fats and Oils
GrainCorp Commodity Management (Holdings) Pty Ltd (ACN 000 013 123)	Australia	Oilseeds Feeds, Fats and Oils
GrainCorp Oilseeds Pty Ltd (ACN 006 772 578)	Australia	Oilseeds
GrainCorp Commodity Management Pty Ltd (ACN 107 971 095)	Australia	Oilseeds Feeds, Fats and Oils
GrainCorp Oils Holdings Pty Ltd (ACN 160 256 057)	Australia	Foods
GrainCorp Foods Australia Pty Ltd (ACN 160 258 677)	Australia	Foods
GrainCorp Europe (UK) Limited (CRN 07626308)	United Kingdom	International
Saxon Agriculture Limited (CRN 03599544)	United Kingdom	International