



GrainCorp Limited

# Modern Slavery Statement



## Introduction

GrainCorp is a leading Australian agribusiness and processing company. Our vision is to lead sustainable and innovative agriculture through another century of growth.

Respect for human rights is fundamental to our values, the long-term stability and growth of our business, and to the well being 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.

GrainCorp is committed to complying with the labour rights standards, legislation and statutory requirements in the countries in which we operate, and to acting ethically and with integrity in all business dealings. This extends beyond our own practices to those of our suppliers, via our Supplier Code of Conduct.

We welcome the requirements of the Modern Slavery Act 2018 (Cth) (**the Act**) and are committed to identifying and mitigating modern slavery risks in our business and across our supply chains.

This Modern Slavery Statement is a joint 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 Act, being:

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

## Our Structure

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 more than 2,000 people across Australia, New Zealand, Germany, United Kingdom, Canada, Singapore, India and China.



## Our Operations

GrainCorp’s purpose is “Proudly connecting with customers and rural communities to deliver value through innovation and expertise.” We strive to achieve our purpose through our role as a diversified food ingredients and agribusiness company, with an integrated operating model connecting growers to domestic and international customers across four continents.

GrainCorp is headquartered in Sydney, Australia and provides a wide range of services, facilitated through our two operating segments, Agribusiness and Processing.

### Agribusiness

A leading Australian end-to-end grains and oils supply chain business with diversified international grains and oils origination and destination capabilities. The key commodities and products handled and traded by this segment include wheat, barley, sorghum, corn, oilseeds, pulses and organics. Our bulk commodity business is Australia and New Zealand’s largest exporter of tallow and Used Cooking Oil (UCO), some of which is processed for upcycling into biofuel. Meanwhile, our feeds business uses edible oils and molasses-based products to boost farm productivity.

### Processing

A vertically integrated edible oils crushing, processing, manufacturing, and distribution business with a strong and well-invested footprint across both Australia and New Zealand. Our processing businesses service foods customers with edible oils that are specially blended for infant formula, bakery and large-scale food manufacture.

Further details on GrainCorp’s business, operating structure and joint ventures are outlined in its 2020 Annual Report, which is available via [www.graincorp.com.au](http://www.graincorp.com.au).

## Our Supply Chains

GrainCorp’s supply chains includes the storage, transportation and processing of grains and



oilseeds. They also facilitate the importation and export of a range of commodities which are ingredients or other inputs in our value-added manufacturing operations or those of our customers.

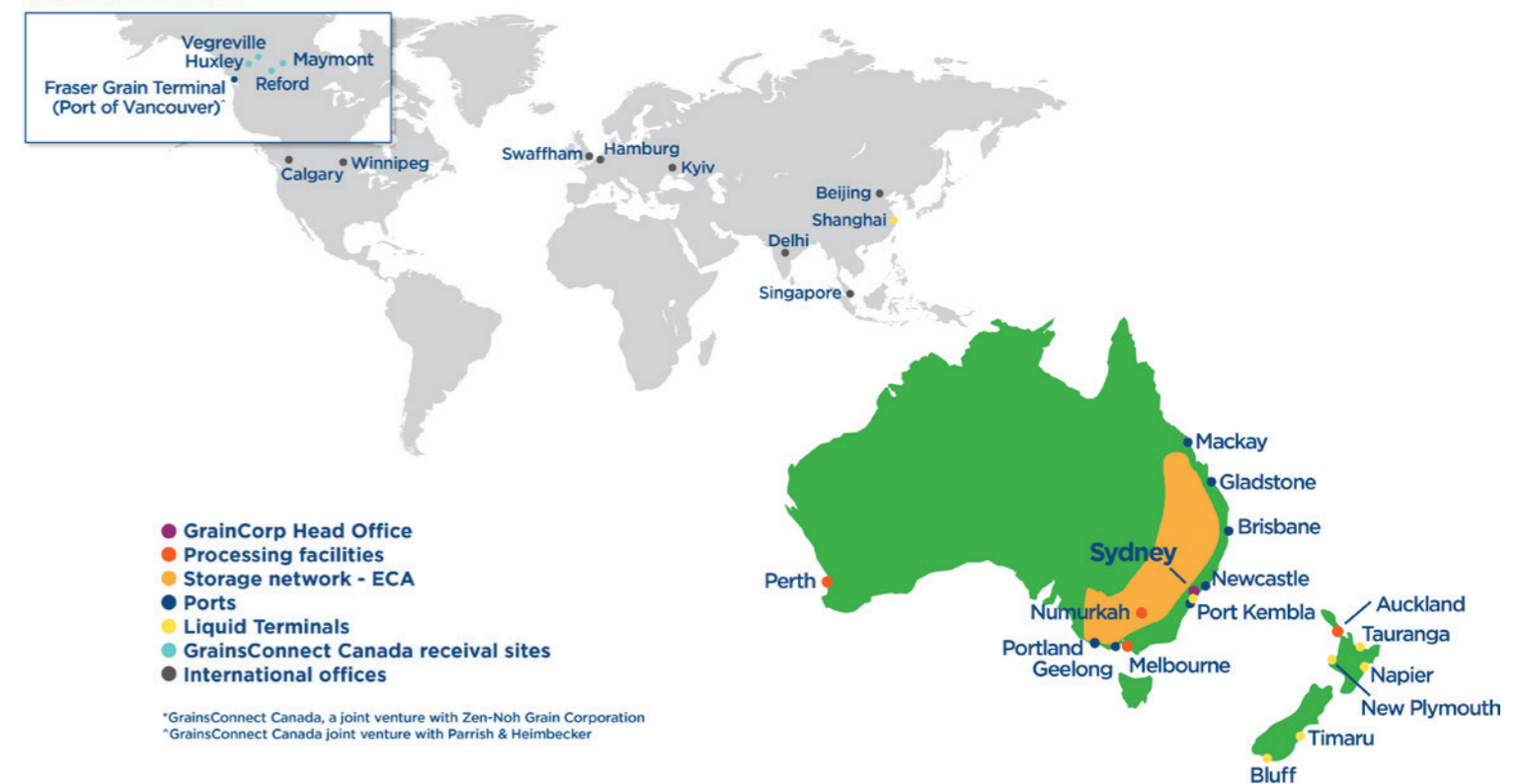
GrainCorp procures a broad range of goods and services from several thousand suppliers across its operating regions of Australia and New Zealand, Canada, the UK and Ukraine.

The main goods and services we source are:

- Commodities including grains, oilseeds (canola), oils (palm, coconut, sunflower, soybean) and UCO (Used Cooking Oil)
- Logistics (3PL 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 (PPE), including clothing and footwear
- Office-based support and equipment including IT hardware and systems, stationery, and cleaning services.

**GrainCorp is a leading diversified Australian agribusiness, with an integrated operating model connecting growers to domestic and international consumers in over 50 countries.**

GrainsConnect Canada JV



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.

## Identifying our Modern Slavery Risk

GrainCorp has considered the potential for it (or its controlled entities) to cause, contribute or be directly or indirectly linked to modern slavery through our operations and supply chains.

While GrainCorp identified a low risk of directly causing or contributing to modern slavery practices through our operations, potential risks were identified in our supply chains.

We have identified the following potential risks in our operations and 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 deemed high risk as per Country Vulnerability Rating.<sup>1</sup>

These risks were considered in developing our roadmap of management actions to build processes that enable identification, management, ongoing monitoring and reporting on modern slavery issues and risks.

<sup>1</sup> The Global Slavery Index published by Walk Free Foundation. [www.globalslaveryindex.org](http://www.globalslaveryindex.org)



## Risk Identification, Mitigation and Remediation

### Governance Framework

GrainCorp’s Codes of Conduct and other policies have been developed to align with our values and to ensure that we observe the highest standards of fair dealing, honesty and integrity in our business activities.

GrainCorp’s Audit & Risk Committee (**ARC**) oversees the effectiveness of GrainCorp’s risk management systems. GrainCorp’s Management team provides risk management reports to the ARC on a quarterly basis, enabling review and consideration of recent developments, indicators and emerging risks.

### Supplier Due Diligence Approach

GrainCorp’s Third Party Due Diligence Procedure is a guide to entering or renewing existing business relationships.

For the onboarding of new suppliers, GrainCorp’s Management team has implemented a risk-based due diligence approach that is aligned with existing 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.

GrainCorp has identified and assessed

existing direct suppliers for potential modern slavery risks.

We have also commenced a process of engaging with suppliers to understand their approach to modern slavery risk management.

To ensure our business remains informed, our business receives regular updates on the compliance environment via the Monthly

Corporate Compliance News, including news articles relevant to our customers, operations and supply chains. To facilitate transparency and opportunities to collaborate with regards to modern slavery risk identification and management in our supply chains, GrainCorp has also been engaging with its customers who are keen to understand potential risks within our operations and supply chains.





## GrainCorp Code of Conduct

GrainCorp's Code of Conduct is founded on a set of defined values which guide how we 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, but 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. Refresher training is provided periodically. GrainCorp's Code of Conduct is available on GrainCorp's website: [graincorp.com.au](http://graincorp.com.au)

### Whistleblower

GrainCorp has a dedicated Whistleblower hotline 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](http://graincorp.com.au)

### Human Rights Mailbox

GrainCorp has established a mechanism whereby human rights grievances or concerns are able to be raised. Contact details are contained in GrainCorp's Modern Slavery Policy which is available on the Corporate Governance section of our website: [graincorp.com.au](http://graincorp.com.au). The mailbox is monitored daily by GrainCorp's Risk and Compliance Unit and investigations are undertaken as required.

### Supplier Code of Conduct

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.





## 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. The working group briefed the Executive Leadership Team and Senior Leaders. 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 published its Modern Slavery and Human Trafficking Statement. This is available at [saxonag.co.uk](http://saxonag.co.uk)

## Future Actions

We are committed to further developing and continuously improving our program as we learn more about our modern slavery risks and ways to mitigate them. For the coming year our focus will include expanding risk assessments, working externally with our suppliers to enhance their awareness and risk profile, and developing measures and processes to assess and improve the effectiveness of our actions with respect to mitigating any risk of modern slavery practices in our supply chains.

## Our Operations

During the reporting period, we have not confirmed any instances of modern slavery requiring remediation. However, from time to time we may have conversations with a small number of suppliers to obtain supplementary documentation to inform our due diligence investigations. Where relevant, these will be reported in our subsequent Modern Slavery Statement, along with any remediation measures required.

## Assessing the Effectiveness of Our Actions

Compliance with the Act is fundamental for GrainCorp and has prompted us to engage with suppliers as to how they manage their modern slavery risks. GrainCorp looks forward to building stronger and more transparent relationships with our suppliers. As our processes become more established, we

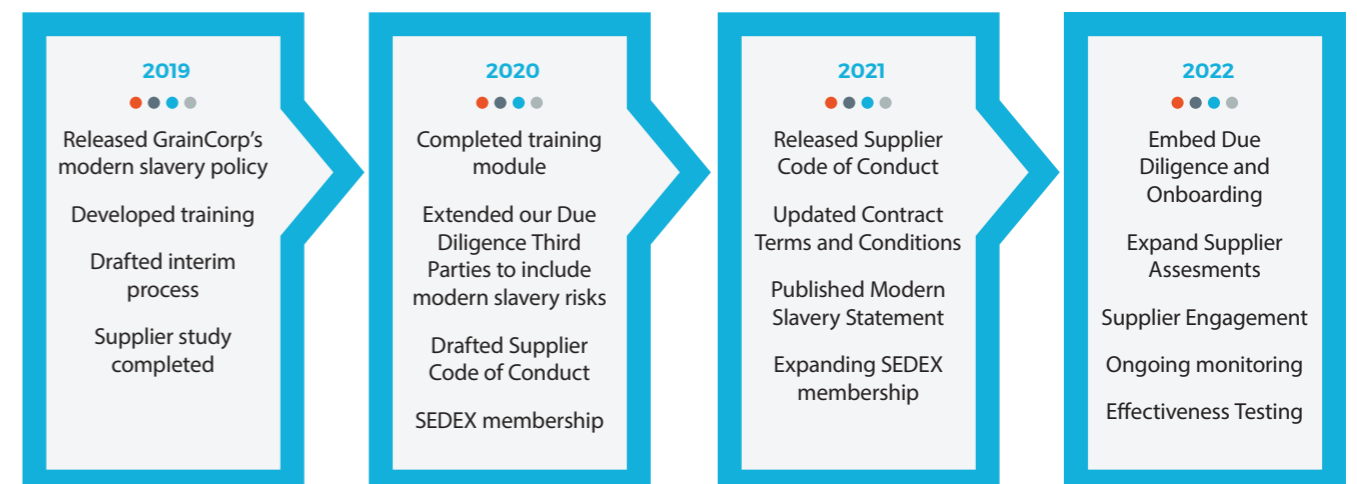
intend to expand our Third-Party Due Diligence process beyond those identified as high risk during the initial assessment.

We recognise that we are early on our journey with regards to modern slavery risk management. As our maturity develops, and assessment, monitoring and supplier engagement processes are embedded, our ability to determine effectiveness of these actions will also improve. Measuring mechanisms will be instituted in the next reporting period and included in subsequent Modern Slavery Statements.

GrainCorp's risk management approach of 3 lines of defence will play an important part in assessing the effectiveness of our organisational capability with regards to modern slavery risk management, and inform our roadmap to deliver further improvements. Training has been rolled out to over 400 of our people so far and will be expanded to ensure we build understanding and have effective monitoring at the front line. The GrainCorp Board and sub-committee reporting includes training completion rates, whistleblower statistics and resolution progress

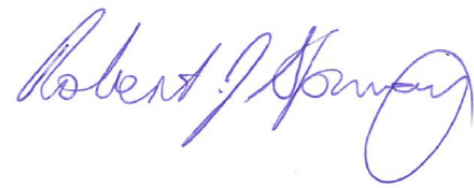
(including as it relates to modern slavery practices).

We intend to expand our use of SEDEX as a tool to assess and manage modern slavery risks. SEDEX may be used to monitor effectiveness of our initial and ongoing assessment criteria and processes by reporting instances and insights from any unsatisfactory audit results for suppliers of GrainCorp.



## Statement Approval

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



**Robert Spurway**  
Managing Director and CEO  
GrainCorp Limited  
31 March 2021

