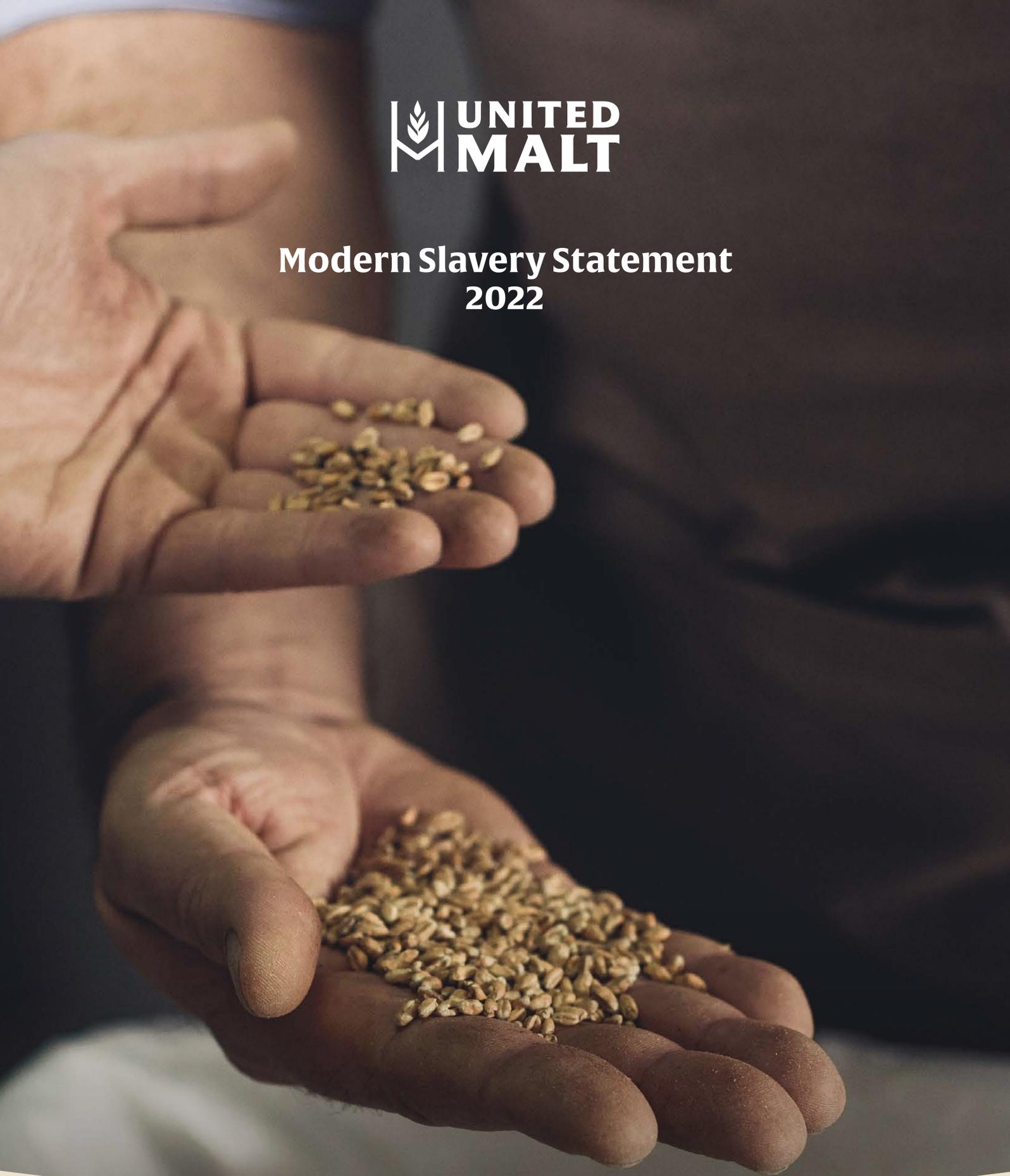




**Modern Slavery Statement
2022**



Safety Passion Quality Integrity



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Message from the Managing Director and CEO

Welcome to United Malt Group Limited's (United Malt or "Group") 2022 Modern Slavery Statement (the Statement). This statement is made on behalf of our subsidiaries, and in accordance with the respective modern slavery reporting legislation in Australia and the United Kingdom.



Our 2022 Modern Slavery Statement has been prepared to meet our reporting requirements under the Australian Modern Slavery Act 2018 (Cth) and the United Kingdom Modern Slavery Act (2015), and describes the actions United Malt has taken to address modern slavery risk in both our operations and supply chains during the FY22 period.

Summary of our Modern Slavery FY22 actions

I am pleased to share the key actions we have undertaken throughout the 2022 financial year to continue to develop our response to this serious issue.

- We improved Modern Slavery governance, drafted a Modern Slavery Group Charter and formalised our Group-wide modern slavery risk tolerance;
- We continued and extended our training to further support our approach to identifying and addressing potential risks for both key staff and all employees across United Malt Group;
- We continued our targeted supply chain due diligence activities;

- We explored collaboration opportunities to work towards addressing systemic issues, identifying some multi-stakeholder initiatives which will enable us to play a broader role in our ambitions to support an end to modern slavery;
- We conducted a review of existing whistleblower processes, identifying a number of improvements to render the processes more accessible and commenced development of a modern slavery remediation procedure and response protocol; and
- We developed a draft internal monitoring and reporting framework.

During 2023, we will focus on continued third party due diligence and assessments, training, and implementing improvements to our grievance mechanism and response protocols to manage the risk of any identified instances of modern slavery.

This Statement was approved by the Board of Directors of United Malt Group Limited on 14 March 2023.



Mark Palmquist
Managing Director and CEO

Governance

FY22 ACTIONS

- Expanded the Modern Slavery Steering Committee to ensure appropriate geographic and cross-functional Executive-level representation to lead our modern slavery response and established a Modern Slavery Operational Working Committee.
- Developed a Modern Slavery Group Charter to define accountabilities and terms of reference for the Modern Slavery Steering Committee and Modern Slavery Operational Working Committee.
- Formalised a Group-wide modern slavery risk tolerance.
- Commenced consultation to develop a Human Rights Policy to set out our broader human rights commitments and approaches.

ONGOING FOCUS AREAS

- Complete appropriate geographic and cross-functional resourcing of newly established Modern Slavery Operational Working Committee.
- Progress Human Rights Policy through internal review and approvals processes.
- Develop a Supplier Code of Conduct.

Training

FY22 ACTIONS

- Conducted a second phase of training targeted at 481 key personnel to further support our approach to identifying and addressing potential risks during the supplier vetting stage.
- Conducted general modern slavery awareness training to support all staff across all geographies and sites.

ONGOING FOCUS AREA

- Continue to conduct general awareness training and where applicable role-based training for all new employees to the Group.

Due diligence activities

FY22 ACTIONS

- Continued due diligence activities on suppliers identified to be within our higher risk categories through the completion of supplier self-assessment questionnaires.
- Developed detailed supplier engagement materials to support our risk assessment processes as part of the credit assessment and approval processes for all strategic and materials suppliers.
- Commenced mapping and assessment of our shipping and logistics network and practices to identify where we have influence, to understand where we have opportunities to mitigate the risks of human rights violations within our shipping and logistics supply chains; and explored collaboration opportunities to address systemic issues.

ONGOING FOCUS AREAS

- Continue due diligence activities over existing higher risk category suppliers, including new suppliers to the Group.
- Commence development of corrective and/or preventative action plans in partnership with suppliers to address control gaps.

Collaboration and knowledge sharing

FY22 ACTIONS

- Engaged with the Investors Against Slavery and Trafficking (IAST) and identified potential collaboration partnerships – to enable us to play a broader role in our ambitions to support an end to modern slavery.

ONGOING FOCUS AREA

- Develop strategic partnerships to enable United Malt to play a broader and proactive role in our ambition to support an end to modern slavery through membership in multi-stakeholder and advocacy initiatives. This includes becoming a signatory to the United Nations Global Compact.

Assessing effectiveness

FY22 ACTIONS

- Undertook an effectiveness assessment of our existing Modern Slavery controls framework and indicators of programme effectiveness.

ONGOING FOCUS AREA

- Review and implement the modern slavery internal monitoring and reporting framework.

Grievance and Remediation

FY22 ACTIONS

- No instances of modern slavery were identified within our operations or supply chains during the year, and therefore no remediation activities were performed.
- Conducted a review of our grievance mechanisms, including Navex Global EthicsPoint, and identified a number of improvements to render the processes more accessible and to ensure that the service is aligned with the reporting and remediation process being implemented as part of our ongoing Modern Slavery Risk Management Programme.
- Commenced development of a modern slavery remediation procedure and response protocol.

ONGOING FOCUS AREAS

- Implement the improvements to our grievance mechanism to render the processes more accessible and to ensure that the service is aligned with the reporting and remediation process being implemented.
- Implement the modern slavery remediation procedure and response protocol, supported by relevant training of key personnel.

Reporting entities

United Malt Group Limited (ABN 61 140 174 189), on its behalf and on behalf of its Group Companies (collectively, 'United Malt' 'we', 'our' or 'Group') makes the following joint Modern Slavery Statement under the *Australian Modern Slavery Act 2018* (Cth) (Australian Act) and the *UK Modern Slavery Act 2015* (UK Act). For purposes of the Australian Act, this Statement is made by the reporting entities United Malt Group Limited, and Australia Malt Holdco Pty Ltd, Australia Malt Finco Pty Ltd and Barrett Burston Malting Co Pty Ltd and their owned and controlled subsidiaries. For the purposes of the UK Act, this statement is made by Bairds Malt Limited on behalf of its owned and controlled subsidiaries.

The registered office details of United Malt Group Limited are as follows:

Citigroup Centre
Level 18, Suite C
2 Park Street
Sydney NSW, Australia 2000

The sections of the Statement outlining our response to the mandatory reporting criteria required by the *Australian Modern Slavery Act 2018* and recommended reporting criteria by the *UK Modern Slavery Act 2015* are set out in Appendix A.

Consultation

Our Modern Slavery Risk Programme is governed and managed at a Group level and has been implemented across our business activities. Representatives from all of the operating entities we own or control were engaged and consulted throughout the reporting period to drive the effective implementation of our programme objectives, and to support the development of this Statement. Throughout this process, representatives across our operations were consulted to confirm our understanding of the consistency with which the implementation of our existing modern slavery management practices was taking place.

The development of this statement was led by our Modern Slavery Steering Committee with input from a range of stakeholders and teams across Legal, Operations, Procurement and Supply Chain, People and Culture, Risk and Finance. Relevant members of our Executive Committee and the Chief Executive Officer also reviewed this Statement before review and approval by the Board of Directors.

About us

United Malt is a leading global maltster, operating as a consolidated network of companies across Australia, New Zealand, North America and the United Kingdom.

Our Purpose

Our company purpose is 'Creating the ingredients that bring people together' in order to create value for our stakeholders. It provides the foundation of our business strategy.

United Malt primarily serves the brewing, distilling and food markets through our family brands, anchored in the world's finest barley growing regions.

Our Values



Safety

The safety of our people is paramount. Safety is part of our way of life and requires the commitment of everyone throughout the organisation. Safety extends to the health and wellbeing of ourselves and everyone around us and to the environment in which we operate. It is part of everything that we do as well as the way that we do it. It is our way of coming together as a community.



Quality

We provide outstanding ingredients and superior service that, together, deliver premium value to our customers. At every step in the process, and in all our roles, we come together as a team to make sure that we strive to provide the best.



Passion

We are deeply passionate about making malt and proud of our industry, our business and our people. We are proud to be part of a wider community and are positive stewards in the way we work. We bring a spirit of innovation and continuous improvement to everything that we do.



Integrity

We believe that nothing is more important than our reputation and, behaving with the highest level of integrity is fundamental to who we are.

Structure, operations and supply chains

Our Structure

United Malt is a leading global maltster, with ~921 employees as at 30 September 2022. We operate across Australia, New Zealand, North America and the United Kingdom, with operational headquarters in Vancouver, Washington, US. United Malt is listed on the Australian Securities Exchange (ASX: UMG) and holds 100% ownership of subsidiaries which are registered and operate in each of our regions.

More information on our organisational structure and corporate governance can be found in our 2022 Annual Report and Corporate Governance Statement at www.unitedmalt.com.

Our Operations

United Malt has approximately 1.3Mtpa of capacity across 12 processing plants in Canada, the United States of America, Australia and the United Kingdom. Our malting assets are strategically located across major barley growing regions providing access to high quality barley and in close proximity to critical transport infrastructure providing better access to customers.

United Malt creates value along the malt supply chain, from barley procurement and handling to malt processing, and sale and distribution of value-added malt and related products. United Malt benefits from having high quality, low operating cost processing assets that are strategically located in premium barley growing regions, allowing it to source high quality barley and access a diverse range of customers.



Selection of the highest quality barley

We maintain long term relationships with a diverse range of growers, over multiple growing regions. We contract directly with growers for production acres and planting of specific varieties to meet the needs of our customers. We also contract with Merchants for supplies of grain, who have the direct relationship with the farmers.



Quality & provenance preservation

We have capabilities to store our barley in the right conditions to maintain quality prior to processing. We segregate our barley to preserve its unique identity and key quality attributes to meet our customers' requirements.



Processing – Conversion to Malt

Our processing plants are near barley crops, reducing transportation and handling requirements. In our 12 processing plants we convert the barley into malt via a process of steeping, germination and kilning. Through these processes we create our range of base and speciality malts for applications in the brewing, distilling and food markets.



Distribution

Distribution is a further step in our value creation, as we connect our customers to our malts in the format that meets their requirements. We distribute our malt products in a bulk format via rail car, road and containers to major food and beverage producers. In addition, we provide our malts in a smaller format to meet the needs of craft producers. We complement our malt ingredient offering with the provision of the full range of other brewing and distilling ingredients. We provide our customers with products including hops, yeast, adjuncts, flavours and packaging materials – providing the one stop shop for craft producers.

North America

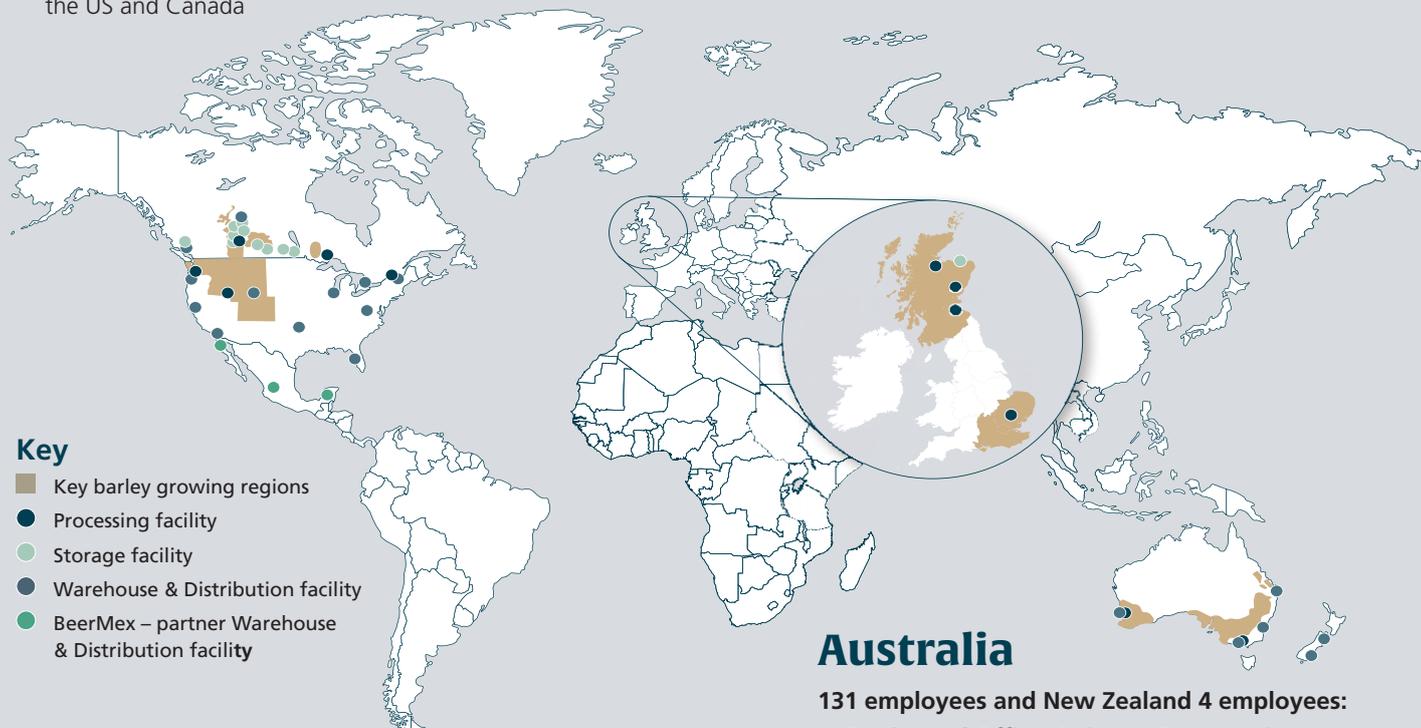
United States 357 employees and Canada 246 employees:

- **Global HQ:** Vancouver, WA
- **Great Western Malting and Canada Malt:** Approximately 750kt malting capacity in five locations in the US and Canada, with nine country elevators in Canada
- **Country Malt Group:** 13 distribution centres across the US and Canada

United Kingdom

183 employees:

- **Bairds Malt:** Approximately 280kt malting capacity, with three plants in Scotland and one in England



Australia

131 employees and New Zealand 4 employees:

- **Registered Office:** Sydney, NSW Australia
- **Barrett Burston Malting:** Approximately 250kt malting capacity across three locations in Australia
- **Cryer Malt:** 5 distribution centres across Australia and New Zealand

Our Supply Chains

United Malt aims to create value for our stakeholders in our operating geographies. We therefore prioritise the procurement of barley and aligned supplies from growers, farmer co-operatives or grain merchants in the local regions in which we operate, subject to quality and cost considerations. We maintain long-term relationships with a diversified network of growers, contracting directly for production acres and planting of specific varieties to meet the needs of our customers.

We procure goods and services across the following primary spend categories:

- **Commodities** – barley and other cereal grains which are ultimately converted into malt for sale to customers.
- **Goods for resale to customers (GFR)** – in addition to grains, United Malt sources malt and malt-adjacent products and agrichemicals. These are resold directly to customers.
- **Packaging Materials** – used to store and distribute our malting products.
- **Warehousing & Transport Logistics (including shipping)** – where United Malt does not own warehouses in certain locations, barley storage is outsourced to third party warehousing providers. Third Party Logistics carriers are engaged to transport our products to domestic and international customers.
- **Labour hire / contingent labour** – to augment our permanent workforce.
- **Goods not for resale (GNFR)** – to support our business activities, we procure a range of goods and services which are not intended for resale to customers. This includes:
 - Fixed plant and equipment maintenance services, including consumables;
 - Energy & utilities (including water);
 - Personal protective equipment (PPE), including clothing and footwear;
 - Office-based equipment including IT hardware and systems, furniture, merchandise, office stationery; and
 - Support services including cleaning and security services, IT services and professional services.

Risks of modern slavery in our operations and supply chains

Modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedoms. Modern slavery manifests within modern day supply chains in practices such as forced labour, debt bondage, child labour and other slavery-like practices such as human trafficking. Modern slavery sits at the extreme end of the continuum of exploitation which ranges from minor and major labour law violations through to serious criminal exploitation where people are forced to work without pay and unable to leave their workplace or stop working.

At United Malt, we acknowledge the risk that modern slavery practices may exist within the value chains in which we do business, and that we have a moral responsibility to take actions which contribute to identifying and mitigating such risks to remediate harm.

As set out in our Modern Slavery Policy, respect for human rights remains one of our key business values. We are committed to conducting our business in a way that recognises and respects the right of those with whom we do business, including our employees, customers, suppliers and contractors, to be free from modern slavery practices.

Our approach to identifying modern slavery risk is integrated into our systematic approach to risk management. This following section outlines the modern slavery risks that may be present in United Malt's operations and supply chains and our controls to identify, assess and mitigate risks of harm.

In identifying our modern slavery risks, we recognise the continuum of involvement, as set out in the UN Guiding Principles on Business and Human Rights (UNGPs), where we may have caused, contributed to or be directly or indirectly linked to modern slavery through our operations and supply chains.

Risks in our operations

Whilst we recognise that United Malt's business activities could have adverse human rights impacts on stakeholders both within and outside the organisation, we consider the modern slavery risk in our operations to be low.

Our offices, processing, storage, warehousing and distribution facilities are located across North America, the United Kingdom, Australia and New Zealand – all of which have a lower incidence of modern slavery, according to the Global Slavery Index (2018)¹.

At the end of the reporting period, United Malt employed approximately 921 employees across our operating geographies, with 909 permanent employees, four fixed term and eight temporary/casual workers. Our workforce comprises predominantly permanent employees, with a small number (8/921 or >1%) of casual or temporary workers. The majority of our staff are located in the United States (357) and Canada (246), with smaller contingents in the United Kingdom (183), Australia (131), and New Zealand (4).

Whilst we acknowledge the employment of casual or temporary and manual workers across some of our operating activities presents an inherently higher risk of modern slavery, the strong regulatory environments in which we operate, coupled with our robust policy environment including remuneration, a compliance culture, and our modern slavery controls framework, mitigates the risk of modern slavery occurring within our operations.

Role based training across the workforce on modern slavery is a further control we have in place to embed a culture that minimises the risk of modern slavery within our organisation.

Risks in our supply chains

In the reporting period we continued our risk-based approach to supply chain mapping, focusing our due diligence efforts on the expenditure categories where there is a higher potential risk for United Malt to cause, contribute to or be directly linked to modern slavery, and where we have greater influence to drive change.

1. 2018 Global Slavery Index at www.globalslaveryindex.org

Commodities – barley and other raw materials/cereals

The most frequently procured raw material in our business is barley. We recognise that, in certain jurisdictions, the agricultural industry presents a higher inherent risk of modern slavery – such as forced labour, bonded labour and human trafficking.

As highlighted in previous statements, the production of barley is harvested by our suppliers through a largely mechanised process which is not labour intensive, and therefore does not involve high levels of seasonal workers. Many of the barley farms we engage are operated by a small group of workers, including family-run farms. Furthermore, we predominantly procure our barley and other raw agricultural materials in close proximity to our operating activities, which are all jurisdictions with a strong rule of law and regulatory environments for employee protections. However, we recognise that harvest methods vary by geography and product type, and there may be some risk of modern slavery or labour-related issues occurring. Where we procure through co-operatives or grain merchants, we ensure we are provided with information about the source of the grains through to the farms.

Maritime

While we do not own ships or directly employ seafarers, we recognise that the shipping industry forms part of the logistical network utilised to supply our customers.

United Malt engages shippers indirectly via shipping brokers in the United Kingdom, and through our relationships with our suppliers and customers to support our operations (inbound) and deliver our products (outbound) domestically and internationally. The global shipping industry has been identified as susceptible to modern slavery and human rights risks including the withholding of crew wages, remuneration below the minimum living wages, poor living and working conditions and lack of access to appropriate grievance mechanisms and remedy protocols. The risks of modern slavery to seafarers are further exacerbated by the fragmented regulatory oversight between flag states, limited access to domestic employment protections, remote working without means to contact home for long periods of time and the practical limitations of the effective enforcement of basic conditions on-board vessels.

Without adequate contractual arrangements and due diligence there is a risk that we could contribute to or be directly linked to modern slavery practices through the activities of another entity we have a business relationship with.

Packaging

We procure a large volume of soft and rigid plastic packaging, used to store and distribute our malting products. We recognise there is a higher inherent risk of modern slavery practices associated to the bulk manufacturing of packaging products, which rely upon an extended, complex and opaque supply chain often with numerous social and environmental impacts.

Labour hire/contingent labour/outsourced (i.e. Cleaning)

Cleaning and security services carry a higher risk of modern slavery, including in North America, the United Kingdom, Australia and New Zealand, due to the low-skill and low-pay nature of roles which often attract migrant workers.

Without adequate contractual arrangements and due diligence there is a risk that we could contribute to or be directly linked to modern slavery practices through our arrangements with suppliers providing cleaning and/or security services at our malting assets, warehousing and distribution sites and our offices.

Policies and governance

Our approach to managing modern slavery risks in our operations and supply chain is underpinned by a strong policy and governance framework.

Key policies and governance procedures include:

Policy and Governance Control	Summary
Modern Slavery Policy	<p>Our Modern Slavery Policy sets out our commitment to respect human rights as one of our core business values at United Malt. We are committed to living these values by conducting our business in a way that recognises and respects the right of those with whom we do business, including our employees, customers, suppliers or contractors, to be free from modern slavery practices. We believe this is not only the ethical position to take, but one that contributes to our social licence and therefore the ongoing resilience of our business.</p>
Code of Conduct	<p>Our Code of Conduct sets the standards of the personal and corporate conduct that we expect of all directors, employees, contractors, suppliers and other third parties with whom we do business.</p>
Third-Party Due Diligence Procedure	<p>Our Third-Party Due Diligence Procedure standardises across our businesses the compliance information we collect from all suppliers, customers, agents and representatives; and the procedures for enhanced due diligence where risks are identified.</p> <p>The due diligence undertaken through the compliance questionnaires includes areas such as ethics, business practices, modern slavery and human rights risk (including child labour and minimum wage and conditions), workplace health and safety and compliance with regulations including anti-money laundering and tax laws.</p>
Whistleblower Protection Policy	<p>Our Whistleblower Protection Policy provides a safe, accessible and confidential environment for people to raise any concerns without fear of reprisal. United Malt also provides an externally managed channel for reporting suspected wrongdoing confidentially and anonymously if desired which can be accessed through the Company's website at www.unitedmalt.com/corporate-governance.</p>
Anti-Bribery and Corruption Policy	<p>Our Anti-Bribery and Corruption Policy expands on the prohibition against bribery and corruption contained in the Code of Conduct and forms part of our Anti-Bribery and Corruption Compliance Programme which provides a framework that:</p> <ul style="list-style-type: none">• raises awareness of anti-bribery and corruption risks;• delivers compliance training and promotes ethical business conduct (including practices related to modern slavery and human rights risks);• maintains systems and procedures for giving, receiving and registering gifts and hospitality;• maintains systems and procedures for conducting due diligence on suppliers and other business partners; and• investigates any reported suspicions of bribery or corruption involving United Malt.

Board oversight

The Audit and Risk Committee (ARC) receives regular reports from management regarding any modern slavery issues identified in United Malt's supply chains and oversees mitigation strategies including third party due diligence. The ARC provides regular reports to our Board on any material breaches of our Codes, Policies and Procedures. These reports may cover a range of focus areas covered by our policy and governance framework, including human rights and modern slavery matters.

More information on our organisational structure and corporate governance can be found in our 2022 Corporate Governance Statement at www.unitedmalt.com.

Due diligence and remediation controls

United Malt's Third-Party Due Diligence Procedure is our primary control to manage the risk of modern slavery within our supply chains. Our Third-Party Due Diligence processes are centralised and governed by our Risk and Compliance Team in Finance.

As a minimum requirement to partner with United Malt, third parties are expected to affirm they have in place or will work towards implementing a robust risk assessment process for their own operations and supply chains to identify and mitigate against risks of corruption, bribery, money laundering, facilitation of tax evasion and modern slavery.

Our due diligence procedures are performed in-house; and where high-risk indicators are found, we utilise specialist risk intelligence agencies to assist with enhanced due diligence. We do not currently perform site audits of our suppliers specifically relating to modern slavery risks; however, through our close relationships with our barley suppliers, we maintain visibility of their practices through our regular farm visits to perform quality checks of the annual barley yields.

Modern Slavery Risk Programme

Modern Slavery Risk Programme Governance

FY22 Overview

- **We expanded the Modern Slavery Steering Committee**
- **We developed a Modern Slavery Group Charter to define accountabilities and terms of reference for the Modern Slavery Steering Committee and Modern Slavery Operational Working Committee**
- **We formalised a Group-wide modern slavery risk tolerance**
- **We commenced consultation to develop a Human Rights Policy to set out our broader human rights commitments and approaches**

In the reporting year we expanded the Modern Slavery Steering Committee (SteerCo) to include appropriate geographic and cross-functional representation at a leadership level. The SteerCo is comprised of leadership representatives from across our operations, including our Chief Operating Officer, Chief People Officer, Corporate Counsel and Company Secretary, UK Chief Financial Officer, and Director of Group Risk and Insurance. Convening at least quarterly, the SteerCo is responsible for leading the overarching longer-term strategy and considering and resolving any identified modern slavery related matters of contention escalated from the Modern Slavery Operational Working Committee (OpCo).

The OpCo will be resourced to include key functional representatives from across our operations, including Operations, Risk, Supply Chain, People and Culture, Human Resources, Health and Safety, Sustainability, Legal, Communications and Finance. The OpCo will convene regularly, to drive progress on agreed undertakings,

manage modern slavery risks across our operations and supply chains, and facilitate internal monitoring and reporting, including reporting of progress to the Modern Slavery SteerCo.

Recognising the importance of defining and maintaining clear accountabilities for relevant personnel across our businesses to drive the successful implementation of our Modern Slavery Risk Programme, we developed a Modern Slavery Group Charter to clearly define roles and responsibilities, maintain accountabilities, and to establish a clear action plan to drive continuous improvements in our programme.

We formalised a Group-wide modern slavery risk tolerance, which was incorporated in our Risk Appetite Statement and approved by the Board.

We also commenced consultation with the Board, Senior Management and external advisors to develop a Human Rights Policy to set out our broader human rights commitments and approaches which strive to be consistent

with the International Bill of Human Rights, the United Nations Guiding Principles on Business and Human Rights and the principles concerning fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

Improving supply chain resilience

In the reporting year, we made significant digital investments, with the implementation of a Transportation Management System (TMS) and a new Enterprise Resource Planning (ERP) platform to improve our procurement and supply network resilience.

In the reporting period, we also made structural changes to our transportation and logistics function, streamlining all North American operations under the remit of the Chief Operating Officer, which has allowed for greater collaboration between sales, production and transportation.

Due diligence activities

FY22 Overview

- **We continued development of detailed supplier engagement materials to support our risk assessment processes as part of the credit assessment and approval processes for all strategic and materials suppliers**
- **We evaluated multiple third-party risk management and vendor due diligence solutions to streamline and automate the assessment, management, and monitoring of all third-party risks**
- **We continued to conduct further supply chain mapping and third-party due diligence; since the launch of the Third-Party Due Diligence process, we have issued 65 Supplier Assurance Questionnaires to higher risk suppliers**
- **We commenced mapping and assessment of our shipping and logistics network and practices to identify where we had influence to identify and mitigate the potential risks of human rights violations within our shipping and logistics supply chains, and explored collaboration opportunities to address systemic issues**

In FY22 we continued development of detailed supplier engagement materials to support our procurement and compliance teams with implementation of the Third-Party Due Diligence procedure for all new direct suppliers.

Recognising effective third-party due diligence and risk governance is critical. In the reporting period we concluded

a market engagement activity and selected a third-party risk management and vendor due diligence solution (Navex Global RiskRate®) to streamline and automate the assessment, management and monitoring of all third party risks. We propose to further enhance the use of this tool by integrating RiskRate® with our new ERP system, and by leveraging our new Expense Policy to improve

the transparency, due diligence and management of our low value transactional expenditure.

We are committed to evolving our programme as we learn more about modern slavery risks across our supply chain and look forward to reporting upon our progress in our next statement.

Supplier due diligence

The impact of the recent severe drought on the Canadian barley crops, ongoing disruptions to ocean and rail supply chains, and our access to high quality master data, has delayed progress with our supplier due diligence programme. However, the implementation of our new Enterprise Resource Planning (ERP) platform and the Navex Global Risk Rate platform will provide us with the digital enablers to improve and accelerate this programme.

We continue to take a risk-based approach to identifying, assessing and managing supply chain risks. In the reporting period, we focused our due

diligence on suppliers and categories where there is a higher potential risk of harm occurring, and where we have greater influence to drive change and therefore impact on our supply chain.

At the end of FY22, 65 higher-risk direct suppliers had been issued a supplier assurance questionnaire, with a 66% response rate.

As part of our ongoing due diligence activities, we will continue to issue and monitor completion of supplier questionnaires, focusing our efforts on those categories where responses rates have been particularly low.

Managing modern slavery risks in our supply chain

Our Supplier Assurance Questionnaire is an important tool to identify those suppliers where additional assistance and/or monitoring may be required in order to address areas of non-conformance.

While no instances of modern slavery were detected through our supplier assurance assessments to date, we have identified opportunities for improvement in the following areas:

- Labour management systems policies, procedures and performance;
- Supply chain due diligence processes;
- Grievance mechanisms; and
- Overtime and pay practices.

As part of our ongoing due diligence activities, we will commence development of corrective and/or preventative action plans in partnership with suppliers to address control gaps.

Action plans may include requiring suppliers to take steps to uplift policies and procedures, and make improvements to their internal risk due diligence processes, grievance and remedy processes; and may contemplate whether any site-based audits are required.

Shipping and logistics supply chains due diligence

In the reporting period we commenced mapping and assessment of our shipping and logistics network and practices to identify where we have influence to identify opportunities to mitigate the risks of human rights violations within our shipping and logistics supply chains, and explored collaboration opportunities to address systemic issues in the maritime industry.

In the reporting period, our UK operations used a chartering broker to select ships or vessels that meet our specifications, and in these instances we have the ability to influence brokers thus ensuring effective due diligence

is performed on the vessels and their respective owners, crews and captains.

In North America and Australia, both inbound and outbound shipping were operated through either our suppliers' or customers' chosen transportation vendors, which relies upon their due diligence. In these instances we may be directly linked to modern slavery risks through these relationships.

Whilst recognising there are limitations in our ability to influence risks in our extended supply chain, we are committed to ongoing engagement with our direct suppliers and

downstream customers to raise their awareness of modern slavery risks. As a minimum requirement to trade, we also seek commitments that the third party has in place, or will work towards implementing, a robust risk assessment process for their own operations and supply chains to identify and mitigate against risks of corruption, bribery, money laundering, anti-facilitation of tax evasion, and modern slavery.

Grievance mechanisms and remediation

FY22 Overview

- **We did not identify any incidents of modern slavery within the reporting period, and therefore did not conduct any remediation activities within FY22**
- **We conducted a review of our grievance mechanisms, including Navex Global EthicsPoint®, and identified a number of improvements to render the processes more accessible and to ensure that the service is aligned with the reporting and remediation process being implemented as part of our ongoing Modern Slavery Risk Management Programme**
- **We commenced development of a modern slavery remediation procedure and response protocol**

Grievance mechanism and remediation approach

United Malt continued and extended our partnership with Navex Global EthicsPoint® to provide an independent, safe and confidential channel for anyone in our value chain to anonymously report concerns, such as those relating to modern slavery and labour rights. We encourage third parties to utilise our ethics portal in good faith. Our customers, suppliers, stakeholders and members of the communities in which we operate may also report modern slavery incidents and risks.

In FY22, we engaged an independent external advisor to conduct an effectiveness assessment of our existing grievance mechanisms provided by EthicsPoint® to understand whether it meets the needs of all rights holders throughout United Malt's value chain based on the criteria for non-judicial operational grievance mechanisms, as outlined in the United Nations Guiding Principles on Business and Human Rights. This review identified a number of minor improvements to enhance accessibility and to ensure that the service is aligned with the reporting and remediation process being implemented as part of our ongoing Modern Slavery Risk Management Programme.

In the forthcoming periods we will also continue developing a Modern Slavery Remediation Response Protocol defining procedures to assess, escalate and investigate modern slavery grievances, including guidance on approaches to determine the potential remedies to resolve the grievance and provide appropriate and adequate resolution.

We look forward to reporting on progress of these two initiatives in our next Statement.

More information on our grievance mechanism and remediation approach can be found at www.unitedmalt.com and concerns can be reported here – [United Malt Whistleblower Protection Disclosure Portal](#).

Training

FY22 Overview

- **Second phase of training for key personnel**
- **Implemented an introductory training session targeted to all staff throughout United Malt**

In our 2021 Modern Slavery Statement, we committed to extend and continue the implementation of modern slavery training to our management and procurement staff; and training all remaining employees. Within the reporting period, we implemented a second phase of training targeted to risk and supplier facing roles to further support our approach to identifying and addressing potential risks during the supplier vetting stage.

This role-based training includes specific modern slavery risk factors associated with different industries, supplier categories and geographies, as well as the appropriate remediation protocols where modern slavery instances are found. The training also included modules on how to determine and evaluate risks in new suppliers, examples of modern slavery found in supply chains and first person accounts of modern slavery trafficking. United Malt's Human Resources teams in each geography where we operate identified employees who would

perform or oversee procurement activities and assigned the training to them. We also developed and delivered general modern slavery awareness training to all employees across United Malt. These sessions explained modern slavery typologies, how it may be present across our business, and how to identify and appropriately escalate any signs that modern slavery practices may be occurring within our operations and supply chains; and reinforced United Malt's responsibility to do our part to identify, assess and mitigate those issues.

Collaboration

FY22 Overview

- **We conducted a review to identify appropriate collaboration opportunities to enable us to play a broader role in our ambitions to support an end to modern slavery**

In the reporting year we undertook a comprehensive review to identify appropriate partnerships which have the ability to drive demonstrable impact through best practice, collective action and shared learning to accelerate the pace of change to end modern slavery.

During the year, we engaged with the Investors Against Slavery and Trafficking (IAST) Asia Pacific initiative, an investor-led working group convened to promote effective action among investee companies in the Asia Pacific region to find, fix and prevent modern slavery. Since the engagement

commenced in 2021, we have had meetings with IAST and have discussed our approach to modern slavery, as well as exploring potential opportunities for continuous improvement.

In FY23 we propose to continue our engagement with IAST and actively contribute to the UNGP principle based multi-stakeholder initiative (MSI), to learn and exchange information with industry peers and like-minded organisations across different industries, and to contribute towards continuous improvement.

Assessing the effectiveness of our actions

FY22 Overview

- **In the reporting period, we engaged an external advisor to support us in the development of a draft internal monitoring and reporting framework, including supplier due diligence processes**

Following management review and approval, the implementation of the internal monitoring and reporting framework will enable us to continue to test the effectiveness of our approaches, enhancing our actions and responses as we work towards best practice and help to drive meaningful change for the individuals most affected by modern slavery.

Looking ahead

We will continue to take actions to better understand and respond to risks of modern slavery, and broader human rights impacts, within our operations and supply chains. Outlined below are our key areas of focus over the coming years, all of which have been endorsed by our Board and senior management.

Our ongoing key focus areas

Governance

- Ensure appropriate geographic and cross-functional resourcing of newly established Modern Slavery Operational Working Committee.
 - Progress a Human Rights Policy through internal review and approvals processes.
 - Develop a Supplier Code of Conduct.
-

Training

- Continue to conduct general awareness training and, where applicable, role-based training for all new employees to the Group.
-

Supply chain mapping, risk assessment and management

- Continue risk-based due diligence activities over existing higher risk category suppliers, including new suppliers to the Group.
 - Commence development of corrective and/or preventative action plans in partnership with suppliers to address control gaps.
-

Collaboration

- Develop strategic partnerships to enable United Malt to play a broader and proactive role in our ambition to support an end to modern slavery through membership in multi-stakeholder and advocacy initiatives; this includes:
 - Continuing our engagement with IAST; and
 - Becoming a signatory to the United Nations Global Compact.
-

Grievance and remediation

- Implement the improvements to our grievance mechanism to render the processes more accessible and to ensure that the service is aligned with the reporting and remediation process being implemented.
 - Continue development of the modern slavery remediation procedure and response protocol.
-

Assessing effectiveness

- Progress activity to review and implement the modern slavery internal monitoring and reporting framework.
-

Appendix A:

Alignment to mandatory reporting criteria Australia – *Modern Slavery Act 2018 (Cth)*

Relevant section	Requirement	Section	Page
s 16(1)(a)	A modern slavery statement must, in relation to each reporting entity covered by the statement, identify the reporting entity.	Cover	1
s 16(1)(b)	A modern slavery statement must, in relation to each reporting entity covered by the statement, describe the structure, operations and supply chains of the reporting entity.	Structure, operations and supply chains	8
s 16(1)(c)	A modern slavery statement must, in relation to each reporting entity covered by the statement, describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.	Risks of modern slavery in our operations and supply chains	10
s 16(1)(d)	A modern slavery statement must, in relation to each reporting entity covered by the statement, describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Modern Slavery Risk Programme	14
s 16(1)(e)	A modern slavery statement must, in relation to each reporting entity covered by the statement, describe how the reporting entity assesses the effectiveness of such actions.	Assessing the effectiveness of our actions	19
s 16(1)(f)	[For joint modern slavery statements] A modern slavery statement must, in relation to each reporting entity covered by the statement, describe the process of consultation with: (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a statement under section 14 –the entity giving the statement.	Consultation	6
s 16(1)(g)	A modern slavery statement must, in relation to each reporting entity covered by the statement, include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Training Looking ahead	18 20

Appendix A:

Alignment to mandatory reporting criteria United Kingdom – Modern Slavery Act 2015

Relevant section	Requirement	Section	Page
54(5)(a)	An organisation's slavery and human trafficking statement may include information about the organisation's structure, its business and its supply chains.	Structure, operations and supply chains	8
54(5)(b)	A [...] statement may include information about its policies in relation to slavery and human trafficking.	Modern Slavery Risk Programme: Policies and governance	14
		Modern Slavery Policy	23
54(5)(c)	A [...] statement may include information about its due diligence processes in relation to slavery and human trafficking in its business and supply chains.	Modern Slavery Risk Programme: Due diligence activities	15
54(5)(d)	A [...] statement may include information about the parts of its 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.	Risks of modern slavery in our operations and supply chains	10
		Modern Slavery Risk Programme	14
54(5)(e)	A [...] statement may include information about its 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	19
54(5)(f)	A [...] statement may include information about the training about slavery and human trafficking available to its staff.	Modern Slavery Risk Programme: Training	18

Appendix B:

United Malt Modern Slavery Policy

<https://www.unitedmalt.com/wp-content/uploads/2021/02/Modern-Slavery-Policy.pdf>

UNITED MALT

