



Unigrain Pty Ltd (ACN 120 061 847)

Modern Slavery Statement 2022

This statement is made by Unigrain Pty Ltd (ACN 120 061 847) (“**Unigrain**”, “**we**” or “the **Company**”) in accordance with sections 13 and 16 of the *Modern Slavery Act 2018* (Cth) for the year ending 30 June 2022.

Entity Structure

The PDF attached as Annexure A sets out the organisational chart for Unigrain.

Operations

Unigrain is an Australian owned and operated company, and is a leading agricultural producer specialising in oat cereal, pulse based and animal nutrition. Our focus is on providing customers with healthy, natural foods grown in Australia for export. Our commitment to quality, safety and ethical systems extends to our unwavering commitment to actively monitor and contribute to the effort to eradicate modern slavery practices from Australia and around the world. We understand that modern slavery practices are active around the globe, and we are committed to identify risks across our business and those we do business with.

We directly employ over 120 staff across Australia, from manufacturing to clerical staff, and we consider our people part of the Unigrain family. Our recruitment ethos is driven by the key values of honesty, integrity, passion for our work and above all a treating everyone with respect. Our recruitment process and practices ensure when hiring Australian and international candidates that we comply with the labour rights, standards, legislation, and statutory requirements that are in Australia. Our recruitment policy ensures that we recruit in a way that acknowledges and respects the rights of candidates to be free from practices of modern slavery.

On commencement of employment, Unigrain is committed to supporting employees to understand their employee rights in Australia. Our onboarding process and practices highlight the importance of helping employees, with emphasis on our international employees, understand their rights under the National Employment Standards and the benefits included in their Award or Individual Agreement. Here at Unigrain we understand that when employees do not understand the conditions of employment, they may be susceptible to modern slavery practices such as working excessive work hours, being underpaid, or feeling that they are unable to leave their position. Unigrain takes seriously its responsibilities in relation to eliminating these risks.



Supply Chain

Unigrain's supply chain, illustrated in the chart below, begins at the sourcing of cereal, oat, and pulse products from Australian farmers. Products are stored both in in-house mills and using externally contracted storage facilities. Products are transported to local and international customers using externally contracted road, air, train, and sea freight transportation.



Modern slavery risks

Unigrain recognises that all production of goods and services are at risk of practices of modern slavery occurring in their supply chain, and therefore monitoring our supply chain for such risks is important. Unigrain is committed to working with our suppliers to ensure that appropriate steps are taken to remediate risks of modern slavery. Modern slavery risks within Unigrain's goods and services supply chain are;

- Forced labour
- Deceptive recruiting for labour or services
- Trafficking in persons
- Domestic trafficking
- Debt bondage
- Unlawful withholding of wages
- Withholding identity documents
- Excessive work hours and restriction of movement
- Deducting excessive fees for remuneration
- Inflated loans to be paid back to employer.



Actions taken to assess and address modern slavery risks

Unigrain have taken steps to implement a Modern-Day Slavery Policy which will outline the processes and procedures that the company undertakes to ensure strict adherence to identify and expose illegal conduct towards modern slavery. We are determined to promote awareness within our workforce and supply chain of the risks relating to modern slavery. We are committed to acting ethically and with integrity in all business dealings and relationships and to implementing and enforcing effective systems and controls to assess and manage modern slavery risks. We will continue to monitor, review, and assess the effectiveness of our measures and work to identify areas where we can implement changes in our Australian operations to reduce the risk of adverse acts in our supply chain.

We expect that our employees and contractors will, once finalised, comply with the Modern-Day Slavery Policy, and always uphold our values. Any breaches of our policy will be subject to investigation and potential disciplinary action.

How Unigrain assesses the effectiveness of actions taken

- Undertaking an enterprise-wide risk assessment and identifying modern slavery risks
- Mapping supply chains
- Annually reviewing Modern- Day Slavery Policy
- Revising procurement terms and conditions
- Revising employee codes of conduct and policies to address modern slavery – such as human rights policies
- Training employees on risks and compliance related to modern slavery
- Setting up systems and procedures to monitor risks in operation and supply chain, including grievance mechanisms

We expect that entities in our supply chain match and reflect our dedication to preventing the existence of modern slavery and that they will comply with all applicable legislation and regulations in relation to workplace rights and labour laws.



Approval by governing body

This Statement was approved by Unigrain's Board of Directors on 18th July 2022.

Signed on behalf of the Board of Directors by

A handwritten signature in black ink, appearing to read "Fiona May".

Fiona May

Co-CEO

UniGrain Pty Ltd

A handwritten signature in black ink, appearing to read "Andrew May".

Andrew May

Co-CEO

UniGrain Pty Ltd