

2022 GRAYMONT MODERN SLAVERY STATEMENT



GRAYMONT



This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (Cth) (“Modern Slavery Act”) for the period 1 January 2022 to 31 December 2022 and has been approved by the Board of Directors of A.C.N. 630 698 716 Pty Ltd on 27 March 2023. This statement is made by A.C.N. 630 698 716 Pty Ltd and is a joint statement prepared on behalf of both A.C.N. 630 698 716 Pty Ltd ACN 630 698 716 and Graymont (Australia) Pty Ltd ACN 004 406 688 (together “Graymont” or “Graymont’s operations in Australia”). This is Graymont’s third Modern Slavery Statement.

MODERN SLAVERY ACT CRITERIA

This Modern Slavery Statement addresses the seven mandatory criteria set out in the Modern Slavery Act. The content list below identifies where the response to each criterion is located within this statement.

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Provide any other relevant information

ABOUT GRAYMONT

Graymont is a global leader in lime and limestone solutions and employs over 250 individuals across Queensland, New South Wales, Victoria, South Australia, and Tasmania. Graymont's operations in Australia are made up of 14 legal entities, A.C.N. 630 698 716 Pty Ltd being the ultimate holding company. Headquartered in Canada, the company is professionally managed, and family owned, and has been in operation for over 70 years. Graymont aims to be the preferred supplier, employer, and partner of choice wherever we operate.

Graymont strives to be an industry leader and attain world-class performance in all aspects of our operations. Our products are well positioned to meet the increasing demand for lime stemming from a heightened global emphasis on environmental protection, while supporting vital industrial processes and agricultural needs. Among a myriad vital applications, lime is used in the purification of drinking water; the treatment of wastewater; in agriculture; in the manufacture of steel, paper, and glass; and in the production of critical minerals and materials necessary for a decarbonised world. As a demonstration of the value of lime, it has been deemed an essential product in every jurisdiction that Graymont operates in globally.

WHAT WE VALUE

Our success requires both individual effort and teamwork in accordance with our shared Graymont values.

- **Integrity**
We always do the right thing.
- **Respect**
 - We respect the right of every individual to a safe workplace.
 - We respect the cultures, customs and values of all people whether they be employees, customers, suppliers, regulators or community members.
 - We respect the sustainability objectives of society including community, economic, social and environmental priorities, needs and interests through all stages of facility development, operations and closure.
 - We respect shareholder capital - the investment the owners have made in the business.
- **Teamwork**
Effective teams can better solve complex problems.
- **Innovation**
There is always a better way to do things.
- **Excellence**
Whatever we do, we do it well.
- **Long-Term Perspective**
We take a long-term perspective around all decisions.
- **Accountability**
We honour our commitments.

HOW WE WORK

Our way of working supports our One Graymont Culture.

- We all understand, share and promote Graymont strategy and direction
- We all act for the benefit and success of all of Graymont, not the geography, region or function
- We vigorously debate and share ideas and points of view
- We hold ourselves and others accountable
- We work cross-functionally and collaboratively across the organisation
- We leverage mistakes as opportunities for learning and innovation
- We are open to change and do not fear the loss of familiar order
- We have fun doing what we do!



MODERN SLAVERY

Graymont continues to support Australia's national modern slavery reporting requirements, as they are a crucial contribution to combatting human exploitation in domestic and global supply chains. It is acknowledged that this initiative is only one of many required to achieve Target 8.7 of the United Nations Sustainable Development Goals:

“Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.”

Graymont's approach to assessing and addressing modern slavery is guided by the United Nations Guiding Principles on Business and Human Rights. When referring to 'modern slavery' Graymont relies on the definition provided in the Modern Slavery Act. The Modern Slavery Act defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour (situations where children are subject to slavery or similar practices or engaged in hazardous work).



MODERN SLAVERY

KEY ACTION HIGHLIGHTS

This document represents Graymont's third Modern Slavery Statement. Facilitated through the work of a cross-functional working group, Graymont has continued to take positive steps to combat the risk of modern slavery in our supply chain.

This section provides an overview of the key actions taken by Graymont over the past three years, while also setting out Graymont's plans to continue to build on these actions in 2023.

IN 2020 GRAYMONT UNDERTOOK THE FOLLOWING KEY ACTIONS TO ADDRESS THE RISK OF MODERN SLAVERY:

- Internal Review of Compliance Practices
- Maintained a Strong Corporate Governance and Accountability Framework
- Promoted our Ethics Reporting System
- Conducted Respectful Workplace Training
- Reinforced the critical role of the Code of Business Conduct and Ethics

IN 2022 GRAYMONT BUILT ON THE ACTIVITIES IN PRIOR YEARS THROUGH THE FOLLOWING KEY ACTIONS:

- Launched the Modern Slavery eLearning Module on Graymont's LearnCentre.
- Began integrating modern slavery awareness into the Employee Onboarding Program
- Commenced development of a Modern Slavery Awareness Poster
- Continued enhancing the Supplier Due Diligence Questionnaire for our supply partners
- Launched a new Contractor Management Platform

IN 2021 GRAYMONT CONTINUED OUR EFFORTS TO ERADICATE MODERN SLAVERY FROM SUPPLY CHAINS THROUGH THE FOLLOWING ACTIONS:

- Review of Compliance Practices
- Establishment of a Modern Slavery Working Group
- Education and Training
- Enhanced contractual protections
- Established Equity, Diversity and Inclusion Statement of Principles
- Strengthened our Global Procurement Team

LOOKING FORWARD TO 2023, GRAYMONT WILL SEEK TO CONTINUE TO BUILD ON OUR ONGOING WORK THROUGH THE FOLLOWING ACTIONS:

- Ensure all relevant existing employees and new starters complete the Modern Slavery eLearning Module
- Incorporate Modern Slavery into Graymont's Employee Onboarding Program
- Launch the interactive Modern Slavery Poster across all Graymont Australia locations
- Implement Graymont's targeted Supplier Due Diligence Questionnaire
- Strengthen the implementation of our new Contractor Management Platform

OUR VALUES

OUR MISSION

Contributing to a decarbonized world by providing essential lime and limestone solutions.

WORLD CLASS LEADER

World Class in everything we do!

You know we are operating safe, clean and orderly facilities where everyone shares a strong commitment to an injury-free workplace.

You recognise our commitment to exceeding our customers' needs by reliably delivering quality products and services.

You feel that we are proactively developing and maintaining relationships of mutual support with our neighbours and others for the long term success of Graymont and our

communities.

You know that we are dedicated to improving our environmental performance.

You see that we are continuously optimising our processes and activities to deliver increased value to all stakeholders.

You know that we are a talented team of engaged and empowered individuals collaborating to deliver World Class performance.



OUR APPROACH

Graymont has roots stretching back for over seven decades and operations which, in some instances, have been lynchpins of their local communities for well over a century. As might be expected of an enterprise with such a history, Graymont takes a long-term approach to business and this is evident in our strong commitment to sustainable growth and strict adherence to responsible environmental, social, workplace and operating practices.

In Graymont's view, accountability for combatting modern slavery is a responsibility shared at all levels within the organisation and is achieved through collaboration with consultants, agents, suppliers and partners. Through this shared responsibility, a focus on continuous improvement and a strong commitment to action we strive to ensure the highest ethical standards are met and, together, we are tackling this key global fight to achieve the goal of eradicating modern slavery in supply chains.

It is acknowledged that the eradication of modern slavery in domestic and global supply chains will not happen overnight. However, Graymont sees this global challenge as an opportunity to show leadership and demonstrate our values as we work to maintain the fundamental human right of freedom from slavery for all of those with whom we interact.

A WORD FROM ANDREW SPEED, PRESIDENT, ASIA PACIFIC

“ *Having assumed the role of President Asia Pacific in January 2023, I am fully committed to sustaining, and further building on, the various actions Graymont has in place to help eradicate modern slavery from global supply chains.*

From my first introduction to the company, it was apparent that Graymont is a values-led organisation. The objectives of the Modern Slavery Act align strongly with those values. This is Graymont's third Modern Slavery Statement. It reinforces the ongoing initiatives Graymont has taken over many years to deliver our vision of being world class in everything we do, outlines how we delivered our 2022 commitments, and sets out our plans in 2023 to further improve on these.

I look forward to taking an active role in these activities as we continue to work together with our employees, consultants, agents, suppliers, and partners to protect human rights and drive the positive change required to put an end to modern slavery. ”



KEY AREAS OF ACTION

Graymont's first Modern Slavery Statement in 2020 was one more step in our journey towards being world class in everything we do. As an organisation we have embraced the opportunity to use the framework of the Modern Slavery Act to continue to build on the work previously undertaken.

Examples of the key areas of action taken by Graymont in 2022 include:

- Launched the Modern Slavery eLearning Module on Graymont's LearnCentre
- Began integrating Modern Slavery awareness into the Employee Onboarding Program
- Commenced development of an interactive Modern Slavery Awareness Poster
- Continued enhancing the Supplier Due Diligence Questionnaire for our supply partners
- Launched a new Contractor Management Platform

Each of these key areas of action is discussed further below in the section titled 'Actions Implemented in 2022' commencing on page 16 of this Modern Slavery Statement.

The input from various Graymont teams, facilitated by the modern slavery working group, combined with the actions taken over numerous years, have enabled Graymont to identify additional ways to help eradicate modern slavery. These actions are discussed further below in the section titled 'Future Actions for Continuous Improvement' commencing on page 18 of this Modern Slavery Statement.

OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Graymont's operations in Australia form part of the broader Graymont group, having joined the Graymont group following the acquisition of the lime and limestone business of Belgian-based Sibelco in August 2019. While relatively new to Graymont, Graymont's operations in Australia are well established, including seven lime plants and several limestone quarries primarily on the east coast of Australia. They form part of the broader Asia Pacific business, which includes lime plants in New Zealand, Malaysia and the Philippines. While these operations do not sit within Graymont's operations in Australia, they are included in this Modern Slavery Statement because they form a key part of Graymont's supply chain, with products being sourced from our Malaysian and New Zealand operations to support Australian customers.



GRAYMONT IN ASIA PACIFIC



LEGEND

- ▼ Regional Offices
- ▼ Other Offices
- ▼ Lime
- ▼ Limestone operations

Graymont’s Asia Pacific operations supply quality lime and limestone products primarily to the agricultural, animal-health and industrial markets in the region. In New Zealand, Graymont operates on both the North and South Islands. In Australia, Graymont’s facilities are located in the states of Queensland, New South Wales, Victoria and Tasmania. In South-East Asia, Graymont has facilities in the Philippines and Malaysia.

The Asia Pacific operations are supported by three regional offices situated in Kuala Lumpur, Malaysia; North Sydney, Australia; and Hamilton, New Zealand; as well as offices in Manila, Philippines, Braeside and Adelaide in Australia.

NATURE OF OPERATIONS

Lime and limestone products are essential to a wide range of services and industries. Lime, Graymont's main product, is a versatile industrial solution that has long been indispensable for vital industrial processes and applications. More recently, lime has also become an essential element for addressing a myriad of complex environmental issues and challenges, both naturally occurring and man-made.

The word 'lime' refers to products derived from burnt (calcined) limestone. Limestone is a naturally occurring and abundant sedimentary rock, comprised of high levels of calcium and/or magnesium carbonate and/or dolomite (calcium and magnesium carbonate), along with small amounts of other minerals. It is extracted from quarries and underground mines all over the world.

Once extracted, the stone goes through a crushing and screening process to create the proper sizes required for various applications. The stone is then fed to a kiln, where it is heated at a high temperature. The intense heat triggers the chemical reaction that transforms limestone into lime. Lime can then be used at this stage, where it's called "quicklime", or water can be added to produce "hydrated lime".

TYPICAL QUICKLIME AND HYDRATED LIME APPLICATIONS

Environment:

acid rain reduction, environment rehabilitation, water and sewage treatment, animal waste treatment, flue gas treatment, industrial sludge and petroleum waste treatment, acidic drainage treatment

Agriculture:

soil pH, soil conditions improvement, dairy and poultry feeding supplements

Food production and conservation:

sugar, produce, dairy, glue and gelatin, baking industry

Construction:

mortar, plastering, restoration, whitewash, soil stabilization and asphalt treatment

Industry:

steel, alumina, glass, pulp and paper and oil and gas production

Mining:

including soda ash, copper, zinc, nickel, gold, uranium

Beyond the extraction and processing of limestone, Graymont's business provides an end-to-end solution aimed at meeting society's needs for quality lime and limestone products. In this way, Graymont's business extends from the evaluation of potential investment and exploration opportunities, securing relevant permits and approvals, partnering to ensure ongoing sustainability, through to rehabilitation and closure of sites. Through this process, Graymont engages with thousands of suppliers across various industry sectors and countries, enabling us to continue to produce and deliver the products required for the ongoing operations of our customers, many of whom provide products and services that are essential in modern society.

SUPPLY CHAIN

Graymont's supply chain is extensive. Graymont had over 1,000 direct suppliers in 2022, ensuring the ongoing reliability of our operations. Almost 99% of these suppliers are based in Australia, and we are committed to supporting businesses local to our operations wherever possible. That said, Graymont also purchases key inputs for company manufacturing processes from Asia, New Zealand, North America and Europe.

GRAYMONT SUPPLY CHAIN INCLUDES



EXPLORATION AND INVESTMENT

- Earthmoving and drilling contractors
- Environmental and water consultants
- Financial services
- Geotechnical support
- Laboratory and technical services



PERMIT APPROVALS AND TECHNICAL SUPPORT

- Environment, health and safety specialists
- Planning and development consultants
- Surveyors
- Financial services



SUPPORT SERVICES

- IT and communication services
- Insurance
- Legal, accounting and employee support services
- Health and safety services
- Laboratory and technical services
- Stakeholder partnerships and initiatives



QUARRY OPERATIONS

- Explosives and blasting contractors
- Fuel supplies
- Health and safety equipment and services
- General contractors and labour support
- Maintenance, parts and equipment supplies



PROCESSING OPERATIONS

- Fuel supplies
- Health and safety equipment and services
- General contractors and labour support
- Maintenance, parts and equipment supplies



TRANSPORT AND LOGISTICS

- Customs brokers
- Freight and haulage services
- Loading and unloading services
- Rail services
- Shipping services

The level of risk associated with modern slavery is influenced by factors such as the geographic location and industry type. Graymont's supply chain is regularly reviewed to identify areas of increased risk of modern slavery.

RISK ASSESSMENT

The ever changing and dynamic nature of global supply chain illustrates the importance of regular risk assessments. Graymont continues to assess our supply chain on an annual basis, using this information to put in place initiatives for continued improvement. In addition to conducting a desktop assessment of potential modern slavery risks within our supply chain, Graymont also took the opportunity in 2022 to re-engage in person with key suppliers. As part of these in person engagements we discussed with suppliers the actions being taken by Graymont in respect to modern slavery and also asked a range of questions to understand the actions and initiatives our suppliers are taking to eradicate modern slavery from global supply chain.



A Graymont ISO tank container providing lime storage for a customer project.

ACTIONS IMPLEMENTED IN 2022

LAUNCH OF MODERN SLAVERY eLEARNING MODULE

In 2021 through various forums, we briefed our employees across Asia Pacific about the potential risks of modern slavery in our supply chain and the ways in which Graymont is working with our supply partners to assess and manage those risks in our day-to-day business practices. We supplemented this with a targeted training session to over 100 employees working in roles that interact with our supply chain partners across all Graymont functions including procurement, sales, logistics, operations, human resources, engineering, geology and maintenance excellence.

In 2022 we built on this education drive with the development, and subsequent launch, of an eLearning module that provides anywhere, any-time training for our employees about what constitutes modern slavery, Graymont's obligations under the Modern Slavery Act, the risks of modern slavery in our supply chain, the signals that might indicate the presence of modern slavery, and what action they can take if they identify any areas of potential concern. This eLearning module complements other eLearning training content that Graymont provides to our people including fostering a respectful workplace and our expected standards of business conduct and ethics. The training incorporates a knowledge check that each participant must 'pass' before they are deemed to have completed the training.

INTEGRATING MODERN SLAVERY AWARENESS INTO EMPLOYEE ONBOARDING PROGRAM

At Graymont all new employees participate in an onboarding program. This is a structured way to help new employees join the Graymont team where they learn about Graymont's culture and current strategies, whilst getting to know their team members and the focuses of their function. Onboarding provides an opportunity to establish purpose by being clear about role responsibilities and performance expectations, commence development planning and to complete assigned eLearning activities that help employees learn more about Graymont's policies, processes and emerging initiatives.

In 2021, the modern slavery working group acknowledged the impact this program would have if it was utilised as a tool to introduce the risks of modern slavery to all Graymont employees from the beginning of their employment. Thus in 2022, the modern slavery working group drafted a 'Modern Slavery Onboarding Note' to be utilised by managers when onboarding new employees. This content provides employees with a summarised view of what modern slavery is, what Graymont has done and will continue to do on the journey towards eradicating modern slavery from global supply chain, and what each employee can do within their own roles to help achieve this goal.

MODERN SLAVERY AWARENESS POSTER

In 2022 the modern slavery working group decided to prepare an interactive modern slavery awareness poster. This will be displayed at each site and office in Australia and will assist to bring awareness of the risks of modern slavery to employees, contractors and visitors at each location. This initiative builds on other successful posters that have been used across the Graymont network to communicate key safety and environmental messages.

In 2022, the modern slavery working group began developing this awareness poster. The poster provides a brief definition of modern slavery, presents Graymont's goal of eradicating modern slavery from global supply chains, and summarises how people can learn more. The poster is interactive as it has a QR code that redirects the reader to Graymont's latest Modern Slavery Statement.

Graymont recognises the importance of ensuring employees remain vigilant for any potential modern slavery indicators. The poster will serve as a visual reminder of the potential risks of modern slavery. The poster will be finalised and deployed in 2023 to all Australian sites. Further information on the rollout plan for the poster is set out in 'Future Actions for Continued Improvement' on page 18.

SUPPLIER DUE DILIGENCE QUESTIONNAIRE

In 2022 Graymont continued enhancing our Supplier Due Diligence Questionnaire. The questionnaire is designed to strengthen the due diligence practices already in place to identify and assess any actual or potential human rights impacts on our operations and supply chain. The questionnaire is not designed to eliminate suppliers with potential modern slavery risks or practices. Instead, it is designed to identify any potentially inappropriate practices and to work with the supplier to ensure they understand our expectations and appropriately mitigate any modern slavery risks.

Initially the modern slavery working group had Planned to implement the Supplier Due Diligence Questionnaire in 2022. As work progressed during the course of 2022 on the implementation of our new Contractor Management Platform, discussed above, it was identified that the Avetta platform could potentially be used as a medium to ask modern slavery related questions of contractors identified as operating in high-risk sectors, industries or geographies. It was agreed that the formal rollout would be delayed until 2023 to allow time for the modern slavery working group to assess the best way to utilise the Contractor Management Platform for this purpose.



LAUNCH OF NEW CONTRACTOR MANAGEMENT PLATFORM

Graymont has engaged Avetta as our global platform for contractor and carrier management to assist us with managing supply chain safety, sustainability and risk. Avetta is a global organisation with strong credentials in this important area. In 2022, Graymont and Avetta worked with relevant supply partners to onboard them to the Avetta platform. This will help strengthen governance, consistency in our approach to managing our supply chain, validation or pre-qualification of key supply partners, and access to e-learning and e-documentation.

The introduction of the Avetta platform signifies a significant step forward in contractor and carrier management. It will allow Graymont to better understand our supply chain while ensuring contractors and carriers understand and meet key minimum standards.

By the end of 2022 the majority of Graymont's contractors and carriers had been onboarded to the Avetta platform. Further details about how we will strengthen the implementation and effectiveness of the Avetta platform can be found in 'Future Actions for Continued Improvement' on page 18.



FUTURE ACTIONS FOR CONTINUED IMPROVEMENT

As a company we strive for continued improvement in everything we do. This approach applies equally to our efforts to identify risks within our supply chain and proactively address them so we can continue to play our part in eradicating modern slavery. We have committed to implementing the following key actions in 2023 that build on our ongoing work to address the risk of modern slavery:

MODERN SLAVERY eLEARNING MODULE

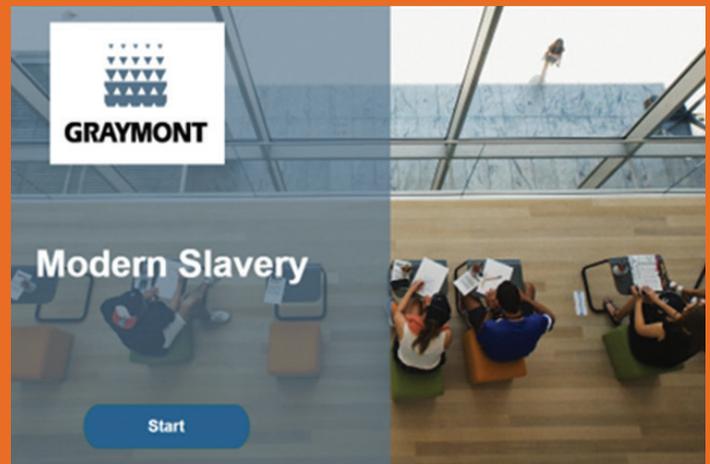
Following the launch of Graymont's Modern Slavery eLearning Module in 2022, the majority of people across our Asia Pacific business, including all salaried employees and additional targeted roles, will be expected to complete this training within a specified timeframe in early 2023. From 2023 onwards, all relevant new starters will also be allocated this training to complete as part of their onboarding process.

Through the introduction of this Modern Slavery eLearning Module we will increase awareness and vigilance across our business on this important area, whilst also arming our employees with the tools and knowledge they need to work with our supply chain partners to drive positive change, helping them support Graymont's continued focus on delivering world class performance in everything we do.

In 2023 Graymont's modern slavery working group will ensure that all targeted employees complete the eLearning module. The group will also evaluate the effectiveness of the training and continue to develop the content in the module to ensure all information remains current.

EMPLOYEE ONBOARDING PROGRAM

In 2023, Graymont will continue to build upon the communication and usage of the Modern Slavery Onboarding Note that was generated in 2022. As a next step, Graymont will map out the preferred Onboarding Program flow and content for different roles and share that with people managers, globally. This program will include the modern slavery content that was implemented in 2022 and will enable further standardisation of onboarding practices by providing a tool for managers to follow when structuring the onboarding plan for their newly hired employees. Future technology enhancements that may be incorporated will be used to further encourage utilisation of the Modern Slavery Onboarding Note and will enhance the benefit of this communication through use of timely, planned notifications to managers and employees.





MODERN SLAVERY POSTER

To promote further awareness within Graymont of the risk of modern slavery, an interactive modern slavery awareness poster will be finalised in 2023 and displayed on staff notice boards at Graymont's operations and offices across Australia. The modern slavery working group will collaborate with each location to develop a communication plan tailored to them that will complement the roll-out of the poster. This poster campaign follows many other successful safety and environmental awareness campaigns carried out across Graymont.

The poster is designed to complement Graymont's modern slavery education and training programs, including the eLearning module and Onboarding Note detailed above, and will provide a visual and interactive tool which brings awareness to this important issue.

Contractor Management Platform

With the majority of contractors and carriers used by Graymont onboarded to the new Avetta contractor and carrier management platform in 2022, we are now able to more actively and effectively manage their company-specific information. To further strengthen the implementation and effectiveness of the Avetta platform across Graymont, a system integration between the Avetta software and Graymont's Enterprise Resource Planning (ERP) software, is due to be effected in early 2023.

In 2023, once the first phase of implementation of the Avetta platform has been completed, we will look to integrate key elements of the Modern Slavery Due Diligence Questionnaire and the eLearning content into the supplier assessment criteria that are built into the Avetta platform.

This will be a key initiative to help deliver Graymont's commitment to ensure that all contractors and carriers who provide services to Graymont are informed about our commitment to helping to eradicate modern slavery in our supply chain and know what they are required to do within their own operations and supply chain to prevent, identify and address potential modern slavery indicators or practices.

We will also look to leverage the Avetta platform to help other businesses within our supply chain who may also have commitment under the Modern Slavery Act.

Due diligence questionnaire implementation

In 2023 Graymont will formally deploy our new supplier due diligence questionnaire. As part of this process Graymont will explore opportunities to build tailored questions into the Avetta contractor management system. For those suppliers not in the Avetta system, Graymont will seek to roll out a paper/online form of the questionnaire. This will be deployed in the first instance to a targeted group of suppliers, allowing Graymont to assess the nature and quality of the responses being received, consider any amendments required, and implement those improvements before rolling the questionnaire out to suppliers more broadly.

Further, Graymont will seek to incorporate the questionnaire into Request for Information (RFI) documents which are used to solicit specific responses from potential suppliers.

Throughout future years, Graymont will continue to deploy the due diligence questionnaire more broadly across the business. We will also leverage the information gained from the due diligence questionnaire to assist with the design of future supplier risk assessments and audit programs as well as proactive initiatives to drive positive change.

ASSESSMENT AND EFFECTIVENESS

As part of our pursuit to be world class in everything we do, Graymont recognises that reflecting on the actions taken to address modern slavery risks, and assessing their overall effectiveness, is a crucial step to putting an end to modern slavery.

In 2022 Graymont focused on implementing steps to address modern slavery risks in our direct supply chain and has continued conversations to drive positive change and awareness with our employees and suppliers. Through our leadership programs and initiatives, the efforts of the modern slavery working group, and significant employee participation, we have already identified opportunities for improvement. Some of these opportunities are outlined in Graymont's 'Future Actions for Continued Improvement' on page 18 of this Modern Slavery Statement. We recognise that we need to actively look for further opportunities for improvement and, to this end, going forward Graymont will seek to better understand our indirect supply chain.

CODE OF BUSINESS CONDUCT AND ETHICS

The Code of Business Conduct and Ethics underpins Graymont's 'One Graymont' values-based approach to compliance. Each year, directors, officers, and employees are asked to refresh their knowledge of and commitment to the Code of Business Conduct and Ethics and sign a declaration confirming that they have received, read and agree to comply with the Code of Business Conduct and Ethics. Periodic training is also provided to all employees to support their ongoing compliance with the Code.

Through the use of an annual declaration, Graymont can ensure there is an ongoing commitment to the Code of Business Conduct and Ethics. This annual declaration is a regular and effective step in ensuring ongoing compliance and in driving the key behaviors required in order to address the risk of modern slavery in supply chains.

A copy of Graymont's Code of Business Conduct and Ethics is available on our website at:
www.graymont.com/en/about-us/mission-vision-values.

AUDITS

During 2022 Graymont continued our approach of completing tailored audits where areas of potential concern had been identified. Where items of concern were flagged, these were promptly raised with relevant suppliers and Graymont worked with them to ensure those concerns were addressed. The use of tailored audits was an effective tool in ensuring supplier compliance and identifying opportunities to support suppliers to meet Graymont's standards over and above compliance.

Graymont also took the opportunity in 2022 to conduct follow-up audits where areas of concern had been identified in previous audits. Through these audits we were able to ensure not only that the previous concerns had been addressed but the supplier had made lasting changes to their processes to address any potential risk of modern slavery.

ETHICS REPORTING SYSTEM

Graymont acknowledges the importance of providing avenues for individuals to report concerns they may identify during their day-to-day activities. As a result, an Ethics Reporting System was established by Graymont many years ago where directors, employees, shareholders, suppliers of goods or services (including any employee of that supplier), customers and community members can anonymously report to Graymont any serious wrongdoing, ethical misconduct or illegal activities, including in relation to modern slavery. This reporting system is available 24 hours a day, 7 days a week. Issues can be reported through a secure website which is made available in local languages, via mail or by telephone with local numbers provided for each country in which Graymont operates.

Through encouraging employees and suppliers to take advantage of the Ethics Reporting System, Graymont is able to ensure there is a constantly accessible avenue available for the reporting of potential modern slavery. This in turn provides Graymont not only with the necessary information to address risks, but also enables us to assess the effectiveness of the measures currently in place.

CONSULTATION

This Modern Slavery Statement is a joint statement prepared on behalf of both A.C.N. 630 698 716 Pty Ltd and Graymont (Australia) Pty Ltd. Given the way in which our Australian business operates, any risks or actions identified in this Modern Slavery Statement apply equally across the entire business. While this Modern Slavery Statement is limited to A.C.N. 630 698 716 Pty Ltd and Graymont (Australia) Pty Ltd, we have consulted with employees across Asia Pacific in identifying risks and agreeing actions to address these risks.



LOOKING FORWARD

While it is acknowledged that more effort is required to eradicate modern slavery from our supply chain, Graymont is encouraged by the progress made and the great opportunity available not only to us, but the entire business community. Graymont looks forward to continuing to work with our employees, consultants, agents, suppliers and partners to ensure our activities have no adverse impact on the human rights of employees, community members and other third parties and that the highest ethical standards continue to be met.

KEY ACTIONS IN 2023 INCLUDE:

- Ensuring all relevant existing employees and new starters complete the Modern Slavery eLearning Module
- Completing incorporation of Modern Slavery into our Employee Onboarding Program
- Launching the interactive Modern Slavery Awareness Poster across all Graymont Australia locations
- Implementing our targeted Supplier Due Diligence Questionnaire
- Strengthening the effectiveness of our new Contractor Management Platform

Through shared responsibility and a commitment to continuous improvement and action we are confident we can help achieve the global goal of eradicating modern slavery from our supply chain.

This Modern Slavery Statement was approved by the Board of Directors of A.C.N. 630 698 716 Pty Ltd.

Andrew Speed
President, Asia Pacific





At Graymont, we regard our commitment to achieving all-around world class performance as a journey — not a destination. We strive for continuous improvement in crucial areas such as supplier engagement and stakeholder relations. We welcome your comments and feedback.

Communications should be directed to:

E-mail: ehs@graymont.com

Or visit us at: www.graymont.com



GRAYMONT

graymont.com