

# 2023 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 2023 to 31 December 2023 and has been approved by the Board of Directors of A.C.N. 630 698 716 Pty Ltd and Graymont (Australia) Pty Ltd on 26 March 2024. 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 and Graymont (Australia) Pty Ltd ACN 004 406 688 (together “Graymont” or “Graymont’s operations in Australia”). This is Graymont’s fourth Modern Slavery Statement. This Modern Slavery Statement was approved by the Board of Directors of A.C.N. 630 698 716 Pty Ltd and Graymont (Australia) Pty Ltd.

## **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.

# TABLE OF CONTENTS

**02**

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Identify the reporting entity

**11**

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Describe the reporting entity's structure, operations and supply chain

**16**

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Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls

**17**

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Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes

**21**

---

Describe how the reporting entity assesses the effectiveness of these actions

**22**

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Describe the process of consultation with any entities the reporting entity owns or controls

**23**

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Provide any other relevant information

# ABOUT GRAYMONT

Graymont is a global leader in lime and limestone solutions and employs over 275 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 75 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 of 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's 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 fourth 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 four years, while also setting out Graymont's plans to continue to build on these actions in 2024.

## 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 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

## 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 2023 GRAYMONT BUILT ON THE ACTIVITIES IN PRIOR YEARS THROUGH THE FOLLOWING KEY ACTIONS:

- Ensured existing employees and new starters completed the modern slavery eLearning module
- Integrated modern slavery awareness into the employee onboarding program
- Finalised an interactive modern slavery awareness poster
- Progressed Graymont's targeted supplier due diligence questionnaire
- Conducted anti-bribery and anti-corruption training
- Broadened the composition of the modern slavery working group

## LOOKING FORWARD TO 2024, GRAYMONT WILL SEEK TO CONTINUE TO BUILD ON OUR ONGOING WORK THROUGH THE FOLLOWING ACTIONS:

- Develop an eLearning training module for employees in Canada, New Zealand and Malaysia
- Establish an intranet page dedicated to modern slavery
- Launch the interactive modern slavery awareness poster across all Graymont Australia locations
- Conduct a pilot program for the implementation of Graymont's targeted supplier due diligence questionnaire
- Continue to focus on broadening the modern slavery working group

# 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 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 organization 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



*“Since joining Graymont in the role of President, Asia Pacific in January 2023, I’ve been very pleased to support the various initiatives Graymont has implemented to eradicate modern slavery from our global supply chains. Collaboration on this important issue between our Asia Pacific and North American businesses has enabled a united response to ensure modern slavery is not present in our global supply chains.*”

*This is Graymont’s fourth Modern Slavery Statement and is aligned with our vision to be world class in everything we do. The Statement outlines how we delivered our 2023 commitments and outlines our plans in 2024 to further improve. I look forward to continuing to take an active role in these activities as we work 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 2023 include:

- Ensured existing employees and new starters completed the modern slavery eLearning module
- Finalised an interactive modern slavery awareness poster
- Progressed Graymont's targeted supplier due diligence questionnaire
- Conducted anti-bribery and anti-corruption training
- Broadened the composition of the modern slavery working group

Each of these key areas of action is discussed further below in the section titled 'Actions Implemented in 2023' commencing on page 17 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 19 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
- ▼ Corporate Office

Graymont's Asia Pacific operations (22 plants) supply quality lime and limestone products primarily to the agricultural, animal health and industrial markets in the region. In Australia, Graymont's facilities are located in the states of Queensland, New South Wales, Victoria and Tasmania. In New Zealand, Graymont operates on both the North and South Islands. In Southeast 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, and Braeside, 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".

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.

## 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

# SUPPLY CHAIN

Graymont's supply chain is extensive. Graymont had over 1,000 direct suppliers in 2023, 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



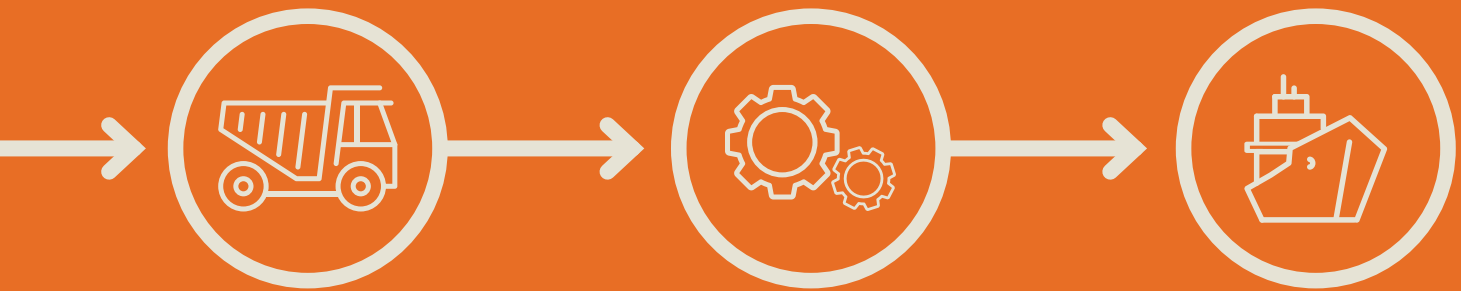
### PERMIT APPROVALS AND TECHNICAL SUPPORT

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



### 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 chains illustrates the importance of regular risk assessments. Graymont continues to assess our supply chains 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 continues to engage in person with key suppliers. As part of these in person engagements we discuss with suppliers the actions being taken by Graymont in respect to modern slavery and also ask range of questions to understand the actions and initiatives our suppliers are taking to eradicate modern slavery from global supply chains.





# ACTIONS IMPLEMENTED IN 2023

## MODERN SLAVERY eLEARNING MODULE

In 2022 we launched 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 actions they can take if they identify any areas of potential concern.

In 2023 we embedded the utilization of the eLearning module by ensuring all new salaried employees in Australia completed the training. The 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.

## INTEGRATED 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 2022 the modern slavery working group drafted a 'Modern Slavery Onboarding Note' to be utilised by managers when onboarding new employees, and this was updated in 2023 to include the modern slavery working group's new actions. 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 chains, and what each employee can do within their own roles to help achieve this goal.

## MODERN SLAVERY AWARENESS POSTER

In 2023 the modern slavery working group developed an interactive modern slavery awareness poster. This will be displayed at each operations 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, environment and wellbeing messages.

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. A copy of the poster is shown above.

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 deployed in 2024 to all Australian sites. Further information on the rollout plan for the poster is set out in 'Future Actions for Continued Improvement' on page 19.



## SUPPLIER DUE DILIGENCE QUESTIONNAIRE

In 2023 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.

## CONDUCTED ANTI-BRIBERY AND ANTI-CORRUPTION TRAINING

We recognise that corruption can facilitate and perpetuate modern slavery by enabling exploitative conditions and creating vulnerabilities in supply chains. Instances of bribery and abuse of power can contribute to the persistence of forced labour, while eroding ethical cultures within organisations. Effectively addressing one issue requires tackling the other. In 2023 we delivered a series of in-person and online anti-bribery and anti-corruption training sessions throughout the Asia-Pacific region which covered Australia, New Zealand, Malaysia and the Philippines. These sessions were specifically tailored to critical business functions in each of the jurisdictions including finance, procurement, human resources and logistics with a total of 115 attendees. The purpose of the sessions was to educate and equip employees in pivotal positions with the tools to combat corruption and champion a culture of integrity, contributing to a supply chain that is ethically resilient and proactive in reporting and preventing instances of corruption and exploitative behaviour such as modern slavery.

The training underscores the critical correlation between anti-bribery and anti-corruption training and our efforts to mitigate modern slavery within our business operations. Recognising that corruption and exploitation often coexist, our training sessions emphasised the interconnectedness of ethical behaviour and human rights. By instilling a culture of vigilance against corrupt practices, employees are not only better equipped to navigate business transactions with integrity but also play a pivotal role in identifying, preventing and reporting instances of modern slavery. The importance of this training in our fight against modern slavery cannot be overstated, as it serves as a key pillar in our strategy to uphold ethical standards and contribute to a supply chain that is free from exploitation.

## BROADENED THE COMPOSITION OF THE MODERN SLAVERY WORKING GROUP

Graymont first established a modern slavery working group in 2021. The group's collective mission was to raise awareness of modern slavery, identify potential higher risk areas within our operations and supply chain and agree on the specific actions to be taken to combat these risks. Since its formation the working group has met quarterly to discuss opportunities for improvement across Graymont's supply chain and operations in Australia and comprises members from various functions within Graymont including procurement, sustainability, human resources, health, safety and environment, logistics and legal.

Since its formation the working group has been focused on Graymont's operations in Australia and the risk of modern slavery in Graymont's supply chains. In 2023 Canada announced it was also introducing legislation to combat the risk of modern slavery in supply chains. The Fighting Against Forced Labour and Child Labour in Supply Chains Act ("Canadian Modern Slavery Act") came into force on January 1, 2024. The Canadian Modern Slavery Act applies to Graymont Limited meaning that Graymont Limited will need to report annually on the steps taken to prevent and reduce the risk of modern slavery.

As a company we felt there was real value in broadening the scope of the modern slavery working group to include representatives from Graymont Limited's North American business. This would allow the working group to better understand the requirements under the Canadian Modern Slavery Act while also ensuring that Graymont Limited can capture the learnings from the Australian business.

Finalising the scope and composition of the updated working group will be a key action item for 2024.

# FUTURE ACTIONS FOR CONTINUED IMPROVEMENT

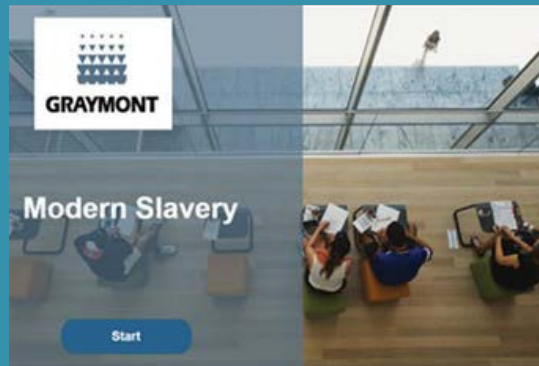
## MODERN SLAVERY eLEARNING MODULE

Through the introduction of Graymont's modern slavery eLearning module in Australia in 2022 we were able to increase awareness and vigilance across our Australian 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 we ensured that all new starters completed the modern slavery eLearning module and in 2024 the modern slavery working group will seek to update the module to incorporate learnings from the past two years and facilitate it being rolled out to employees in Canada, New Zealand and Malaysia. Graymont adopts a network approach to ensuring consistent quality and continuity of supply for our customers. In this way, where necessary, Graymont will call on our plants in New Zealand and Malaysia to supplement lime supply to support the product requirements of our Australian customers. Similar to our approach to product supply, Graymont adopts a collective approach to our training programs. In this way, Graymont will seek to build on the successful rollout of the eLearning module in Australia by launching a similar training module in Canada, New Zealand and Malaysia.

## MODERN SLAVERY INTRANET PAGE

In 2024, the working group aims to create a page on the Graymont intranet website dedicated to modern slavery. This page will serve as a location where all Graymont employees can access modern slavery materials related to our Australian operations such as previous modern slavery statement reports, presentations, any articles of interest and all training materials. It will also include modern slavery materials related to our Canadian operations. This initiative aims to increase awareness of modern slavery for all employees across the company.



## MODERN SLAVERY POSTER

To promote further awareness within Graymont of the risk of modern slavery, in 2024 an interactive modern slavery awareness poster will be 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, environment and well-being awareness campaigns carried out across Graymont. The poster is designed to complement Graymont's modern slavery education and training programs, and will provide a visual and interactive tool which enhances awareness of this important issue.



## DUE DILIGENCE QUESTIONNAIRE IMPLEMENTATION

In 2024 Graymont will seek to formally deploy our new supplier due diligence questionnaire. It was previously proposed that the Avetta platform would be utilised to implement the questionnaire. Following a closer review in 2023 of this proposed approach, it was ultimately decided that, given not all suppliers were covered under the Avetta platform, it would be best to keep the questionnaire as a separate process managed by Graymont's procurement function.

The questionnaire 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.

## BROADEN THE COMPOSITION OF THE MODERN SLAVERY WORKING GROUP

As noted above under the heading 'Actions Implemented in 2023', the Canadian Modern Slavery Legislation came into force on January 1, 2024. With Graymont required to prepare a modern slavery statement under both the Australian Modern Slavery Act and the Canadian Modern Slavery Act going forward, the modern slavery working group feels it is important to review its composition and mandate going forward.

The modern slavery working group sees an opportunity, with the introduction of the Canadian Modern Slavery Legislation, to take a more global approach to its initiatives, seeking to capture the learnings from our Australian operations over the past four years and to apply these to Graymont's Canadian operations. That said, it is acknowledged it will be important to consider the relevant nuances of the local supply chain. To ensure this balance is achieved going forward, the working group will seek to review its composition and scope in 2024. As part of this review the working group will seek a more balanced representation from both Asia Pacific and North America.

# 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 2023 Graymont continued focusing 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 continued to identify opportunities for improvement. Graymont has taken the opportunity to learn from the experiences and approach reported by other companies as well as from the outcomes of the government's statutory review of the Modern Slavery Act.

We recognise that we need to continue to actively look for further opportunities for improvement and, to this end, going forward Graymont will seek to better understand our indirect supply chain. Some of these opportunities are outlined in Graymont's 'Future Actions for Continued Improvement' on page 19 of this Modern Slavery Statement.

## 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](http://www.graymont.com/en/about-us/mission-vision-values).

## 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.

## AUDITS

During 2023 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.

# 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 2024 INCLUDE:

- Develop an eLearning training module for employees in Canada, New Zealand and Malaysia
- Establish an intranet page dedicated to Modern Slavery
- Launch the interactive Modern Slavery Awareness Poster across all of Graymont's Australian sites and offices
- Conduct a pilot program for the implementation of Graymont's targeted supplier due diligence questionnaire
- Broaden the composition of the modern slavery working group

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 and Graymont (Australia) Pty Ltd.

### **Andrew Speed**

President, Asia Pacific



### **Communications should be directed to:**

E-mail: [ehs@graymont.com](mailto:ehs@graymont.com)

Or visit us at: [www.graymont.com](http://www.graymont.com)



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