

## MODERN SLAVERY STATEMENT

This is the second Modern Slavery Statement for Emerald Grain Pty Ltd ACN 109 203 054 (**Emerald Grain**) during the financial periods commencing 1 April 2020 and ending 30 September 2021 (**Reporting Period**).

Emerald Grain has prepared its second Modern Slavery Statement in accordance with sections 14 and 16 of the Act, this Statement reports on the operations and supply chains of the Emerald Grain Group. The legal entity issuing this statement is Emerald Grain Pty Ltd.

### OUR BUSINESS OPERATIONS, ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

#### Structure:

Emerald Grain has approximately 75 permanent employees. Casual employees range from between approximately 10 up to 160 during peak harvest period in the period between October to January.

**Operations within Australia:** Emerald Grain is a grain accumulation, marketing and export company operating in New South Wales, Victoria and Western Australia with its registered office in Abbotsford, Victoria.

Emerald Grain accumulates and then trades the following commodities:

- Wheat,
- Barley,
- Canola,
- Sorghum,
- Lupins, and
- Oats.

**Supply Chains:** Our major areas of spend fall within:

- Raw produce – grain,
- Facilities management - site receipt, port and administrative facilities, and
- Transportation.

The goods that we procure are sourced predominantly from:

- Growers (raw produce i.e. grain), and
- Locally sourced site-running supplies (tarps, bunker consumables, equipment and parts).

Emerald Grain procures services from:

- Transportation companies (intrasite, road, rail and ocean freight), and
- Technical and professional services (repairs, engineering, quality)

### THE PART OF OUR BUSINESS OPERATIONS AND SUPPLY CHAINS WITH A RISK OF MODERN SLAVERY PRACTICES

While Emerald Grain does not directly cause or contribute to modern slavery practices, Emerald Grain recognises that there are parts of our business operations and supply chains which may be directly linked to modern slavery through the goods and/or services procured, be it high risk industries, high risk goods or containing components that are high risk goods, or the manufacturing of these goods or procurement of services taking place in high risk countries:

- **High Risk Countries** - Emerald Grain recognises that while procuring ocean freight services, our ocean freight broker may utilise services that are domiciled in high risk countries.
- **High Risk Industry** – for example, Agriculture (growers), and transportation and Warehousing, and Electronics and Electrical Products Manufacturing, and
- **High Risk Goods** – for example, Cereal grains and Computer equipment (Laptops, Mobile phones).

### OUR POLICIES

Emerald Grain believes in respecting human rights in everything we do. Accordingly, we have zero tolerance to inaction to any form of modern slavery and human trafficking.

Emerald Grain has put in place a modern slavery framework to assist in mitigating human rights risks in our business and supply chains. This framework includes Emerald Grain's Modern Slavery Policy which outlines:

- Due diligence requirements,
- Emerald's response plan,
- Assessment and training,
- Reporting and Modern Slavery Statement, and
- Continuous improvement activities.

### ACTIONS TAKEN DURING THE REPORTING PERIOD

During the Reporting Period Emerald Grain continued its commitment to ethical business practices and its work on a Modern Slavery framework geared toward zero tolerance for all forms of modern slavery, specifically human trafficking, forced labour and child labour:

Actions taken during this Reporting Period include:

- An operational Modern Slavery Working Committee to oversee the Modern Slavery Framework,
- Continued review and analysis of operations, supply chain and spend, identifying where non-direct exposure to modern slavery may exist,
- Continued review and where possible, updating standardised forms and policies e.g. Purchase Orders have been modified referring to Emerald's Modern Slavery Policy
- Developing training on Modern Slavery risks to deliver to Emerald Grain employees where possible;

- Emerald Grain initiated discussions with Grain Trade Australia (GTA) regarding an Australian industry wide approach, chiefly with grower contracts

### **IMPACT OF COVID19**

With the COVID-19 pandemic continuing during most of 2021, business resources continued to be disrupted and redirected to dealing with the challenges of COVID-19 workforce arrangements. Unfortunately, these disruptions did impact Emerald Grain's capacity to make progress on building the modern slavery framework during the Reporting Period.

### **PLAN FOR REMEDIATION**

Remediation processes will be further considered in the next reporting period when Emerald Grain has confirmed whether it has caused or contributed to modern slavery in its business operations or supply chains. In the meantime, our website is linked to our whistleblower service provider, which offers 24/7 access to safely report issues of concern or otherwise can be directed to [compliance@emeraldgrain.com](mailto:compliance@emeraldgrain.com)

### **CONSULTATION PROCESS**

Emerald Grain (although it does not own or control any other reporting entity) has consulted with its controlled entities during this reporting period by reviewing a broad range of transactions from all entities, as well as educating directors of each Group company about Modern Slavery (given they are the same directors) and giving them an opportunity to participate in this process.

This Modern Slavery Statement has been approved by Emerald Grain Board of Directors on



David Johnson – Managing Director  
4 October 2021