

## MODERN SLAVERY STATEMENT

This is the third Modern Slavery Statement for Emerald Grain Pty Ltd ACN 109 203 054 (**Emerald Grain**) during the financial periods commencing 1 April 2021 and ending 30 September 2022 (**Reporting Period**).

Emerald Grain has prepared its third 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 91 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,
- 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, and
- Continued review and analysis of operations, supply chain and spend, identifying where non-direct exposure to modern slavery may exist.

### 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 the Emerald Grain Board of Directors on:



David Johnson – Managing Director & Executive Director  
13 April 2023