

MODERN SLAVERY STATEMENT

This is a Modern Slavery Statement for the following reporting entities:

- Emerald Grain Pty Ltd ACN 109 203 054 (**Emerald Grain**)

during the financial year commencing 1 April 2019 and ending 31 March 2020 (**Reporting Period**).

Emerald Grain has prepared a 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 Group. The entity issuing the statement is Emerald Grain.

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 of October to January.

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

Emerald 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 ie grain), and
- Locally sourced site-running supplies (tarps, bunker consumables, equipment and parts).

Emerald 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 does not directly cause or contribute to modern slavery practices, Emerald 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 recognises that while procuring ocean freight services, our ocean freight broker may utilise services that are domiciled in high risk countries as per Annexure A of the Modern Slavery Policy,
- High Risk Industry – as per Annexure B of the Modern Slavery Policy - Agriculture (growers), and transportation and Warehousing, and Electronics and Electrical Products Manufacturing, and
- High Risk Goods – as per Annexure C of the Modern Slavery Policy - Cereal grains and Computer equipment (Laptops, Mobile phones).

OUR POLICIES

Emerald 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.

We have put in place a modern slavery framework to assist in mitigating human rights risks in our business and supply chains. This framework includes Emerald'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 continued its commitment to ethical business practices and commenced 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 include:

- Formation of Modern Slavery Working Committee to oversee the Modern Slavery Framework,
- Review and analysis of operations, supply chain and spend, identifying where non-direct exposure to modern slavery may exist,
- Review and update where possible of standardised forms and policies has begun. eg Purchase Orders have been modified referring to Emerald's Modern Slavery Policy

- Training of all Emerald employees has begun,
- Emerald initiated discussions with Grain Trade Australia (GTA) regarding an Australian industry wide approach, chiefly with grower contracts

The effectiveness of steps taken to ensure that modern slavery is not taking place in our business operations or supply chains will be assessed in the next reporting period when Emerald has seen the impact on the tools and processes put in place for this first year of reporting. Emerald acknowledges that a continuous improvement approach will be required.

IMPACT OF COVID19

With the onset of the COVID-19 pandemic during 2020, business resources had to be unexpectedly directed towards the formation of COVID safety plans and actions to ensure the continuity of the business in this new challenging environment. This impacted our capacity to make progress on building the modern slavery framework during the second half of the reporting period.

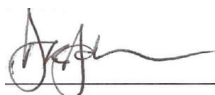
PLAN FOR REMEDIATION

Remediation processes will be further considered in the next reporting period when Emerald 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.

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 Board of Directors on 18 December 2020



David Johnson – Managing Director

18 December 2020