



2021 GRAYMONT  
MODERN  
SLAVERY  
STATEMENT



**GRAYMONT**



This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (Cth) (“Modern Slavery Act”) and has been approved by the Board of Directors of A.C.N. 630 698 716 Pty Ltd on 31 March, 2022. 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 second 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.

- |  |    |
|--|----|
| ▶ Identify the reporting entity  | 01 |
| ▶ Describe the reporting entity’s structure, operations and supply chains  | 05 |
| ▶ Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls                              | 10 |
| ▶ 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 | 12 |
| ▶ Describe how the reporting entity assesses the effectiveness of these actions  | 18 |
| ▶ Describe the process of consultation with any entities the reporting entity owns or controls   | 19 |
| ▶ Provide any other relevant information   | 20 |

# About Graymont

Graymont 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 is the ultimate holding company with operating activities being primarily conducted through Graymont (Australia) Pty Ltd. Graymont is a global leader in lime and limestone solutions. Headquartered in Canada, the business serves markets throughout North America and Asia Pacific. Professionally managed and family owned, Graymont has been in operation for more than 70 years. Graymont aims to be the preferred supplier, employer, and partner of choice wherever we operate.

Graymont's 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 well
- Long-Term Perspective** We take a long-term perspective around decisions
- Accountability** We honor our commitments

## HOW WE WORK

Our way of working supports a 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 organization
- ▶ 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 seen as a crucial contribution to combatting the exploitation of individuals in domestic and global supply chains. It is acknowledged that this is only one measure 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

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
- ▶ Confirmed 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
- ▶ Developed a Supplier Due Diligence Questionnaire
- ▶ Enhanced Contractual Protections
- ▶ Established Equity, Diversity and Inclusion Statement of Principles
- ▶ Strengthened our Global Procurement Team

During 2022 Graymont will seek to build on our ongoing work through the following key actions:

- ▶ Developing a Modern Slavery learning Module
- ▶ Incorporating Modern Slavery Training into Employee Onboarding Program
- ▶ Distributing Modern Slavery Posters
- ▶ Implementing Due Diligence Questionnaire with Supply Partners
- ▶ Launching a new Contractor Management Platform

## Our Values

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

**OUR VISION** World class in everything we do!



### Safety

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



### Customers

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



### Communities

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



### Environment

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



### Value Creation

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



### People

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

# Our Approach

Central to Graymont's corporate philosophy is a long-term approach to business, built on a solid 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, 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 campaign 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 is committed to the journey and 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 JOHN MCBRIDE, PRESIDENT, ASIA PACIFIC:

“ Graymont's second Modern Slavery Statement is a demonstration of the actions being undertaken by Graymont to eradicate modern slavery from global supply chains. Our initiatives in this area commenced well before the introduction of the Modern Slavery Act and our commitment to protect human rights goes to the core of who we are at Graymont. This commitment also aligns with our vision of being world class in everything we do.

As a company we welcomed the opportunity to help bring awareness to the global issue of modern slavery in 2020. Our One Graymont culture means we are all working together to tackle this important issue, and I would like to acknowledge all of our employees, consultants, agents, suppliers, and partners for their efforts and thank them for their combined contribution towards driving positive change. While globally there is a large amount of work still to be done, I remain confident that by working together we can 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 continue to build on the work previously undertaken.**

Examples of the key areas of action taken by Graymont in 2021 include:

- ▶ Review of Compliance Practices
- ▶ Establishment of a Modern Slavery Working Group
- ▶ Education and Training
- ▶ Supplier Due Diligence Questionnaire
- ▶ Enhanced Contractual Protections
- ▶ Equity, Diversity and Inclusion Statement of Principles
- ▶ Strengthened Global Procurement Team

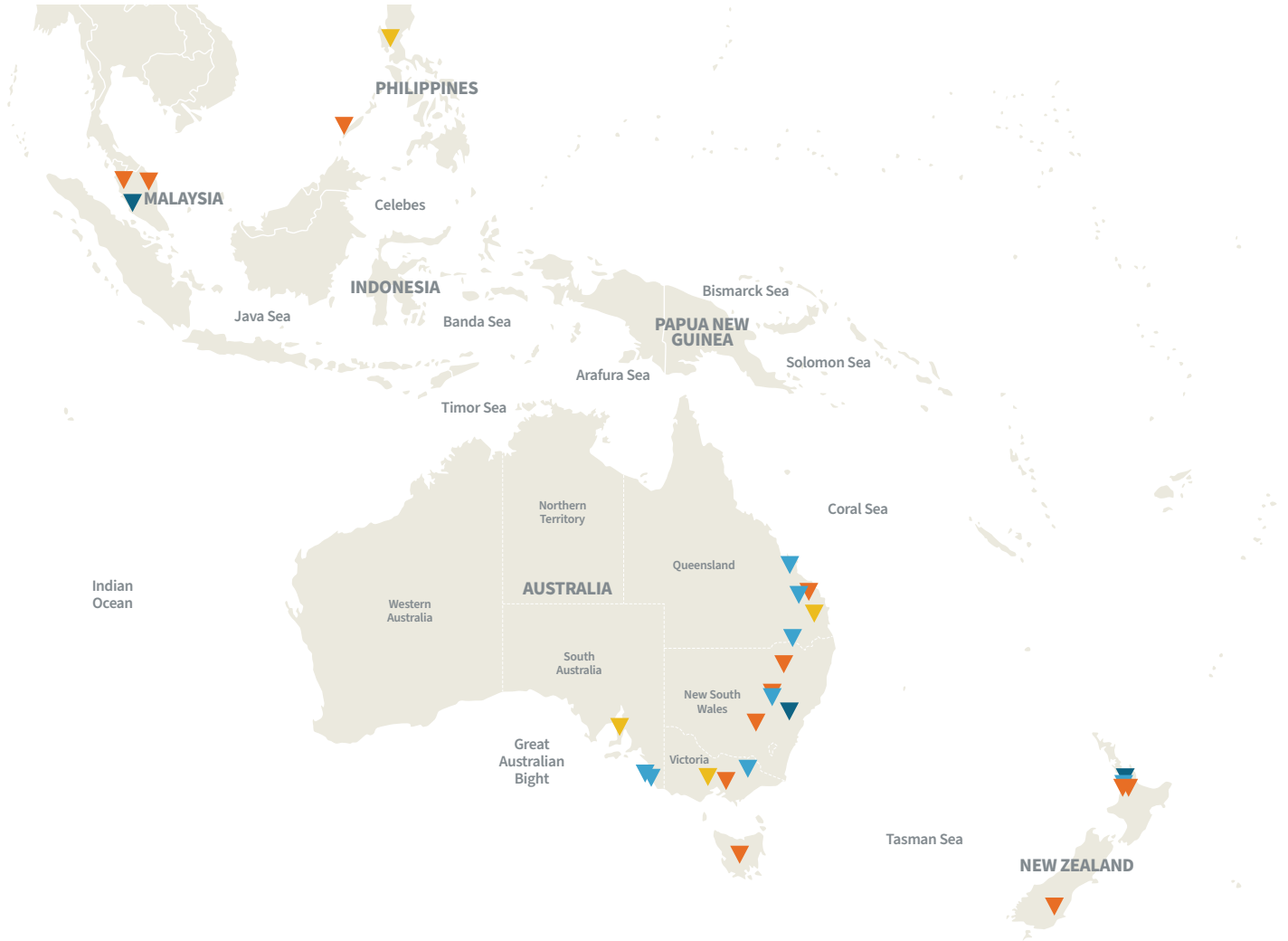
Each of these key areas of action is discussed further below in the section titled 'Actions Implemented in 2021' commencing on page 11 of this Modern Slavery Statement.

The work of the modern slavery working group, combined with the actions taken over numerous years, have enabled Graymont to identify additional ways to build on our actions to help eradicate modern slavery in future years. These actions are discussed further below in the section titled 'Future Actions for Continuous Improvement' commencing on page 15 of this Modern Slavery Statement.

## OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Graymont's operations in Australia form part of the broader Graymont group, having become part of the Graymont group following the acquisition of the lime and limestone business of Belgian-based Sibelco in August 2019. While relatively new to the Graymont group, 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 in so far as they form a key part of Graymont's supply chains 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 (20 plants) 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, 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 high temperature. The intense heat triggers the chemical reaction that transforms limestone into lime. Lime can 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
- ▶ **Food production and conservation:** sugar, produce, dairy, glue and gelatin, baking industry
- ▶ **Agriculture:** soil pH, soil conditions improvement, dairy and poultry feeding supplements
- ▶ **Industry:** steel, alumina, glass, pulp and paper and oil and gas production
- ▶ **Construction:** mortar, plastering, restoration, whitewash, soil stabilization and asphalt treatment
- ▶ **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 Chains

Graymont’s supply chains are extensive. Graymont had over 1,000 direct suppliers in 2021 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



### 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



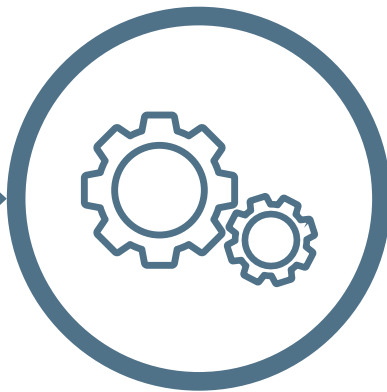


The level of risk associated with modern slavery is influenced by factors such as the geographic location and industry type. Graymont's supply chains are regularly reviewed to identify areas of increased risk of modern slavery.



### 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

# Risk Assessment

Graymont further advanced our risk assessment in 2021 by leveraging the outcomes from the 2020 review to complete a deeper evaluation of suppliers who operate in the geographies, sectors and industries of highest risk and concern. The evaluation completed included benchmarking against other businesses which share a similar profile to Graymont to understand and gain an insight into industry best practices regarding eradicating modern slavery. The evaluation and benchmarking were then used to support the development of a targeted modern slavery due diligence questionnaire.

The modern slavery due diligence questionnaire, discussed further on page 16 below, is a critical assessment tool designed to identify details and information that otherwise may have been overlooked when undertaking a more traditional evaluation of suppliers. Further, the questionnaire will provide Graymont with additional information on our current suppliers which can be utilised for the purpose of future risk assessments. Through more targeted risk assessments, Graymont can be sure that we are focusing our attention on the areas of highest risk and concern.



A Graymont ISO tank container that offers a solution to customers by providing additional storage of lime on project jobs, or for customers that have limited silo capacity

# Actions Implemented in 2021

## REVIEW OF COMPLIANCE PRACTICES

As part of Graymont's goal to be world class in everything we do, Graymont has always had a strong focus on compliance. Graymont regularly reviews company practices and processes to ensure they remain robust and effective.

As noted in Graymont's 2020 Modern Slavery Statement, the purchase of the Sibelco lime and limestone business in August 2019 resulted in a significant expansion to Graymont's operating footprint in Asia Pacific. Following this acquisition, Graymont undertook a detailed review of compliance practices across the Asia Pacific operations. Graymont has continued to build on this work through the course of the 2021 calendar year ensuring that our compliance practices not only protects us from potential risks, but also strengthens our reputation and relationship with stakeholders.

## MODERN SLAVERY WORKING GROUP

In 2021 Graymont established a cross-functional modern slavery working group whose collective mission is to address the emerging risks of modern slavery and to agree on the specific actions to be taken to combat these risks. This working group met quarterly to discuss opportunities for improvement across Graymont's operations in Australia and comprises members from various functions within Graymont including procurement, sustainability, human resources, health, safety and environment, logistics and legal. This group will remain in place as Graymont continues our journey of identifying and implementing effective measures to help eradicate modern slavery from global supply chains.

## EDUCATION AND TRAINING

Building on the structured review of compliance practices and actions outlined in Graymont's 2020 Modern Slavery Statement, the modern slavery working group developed a plan to educate Graymont's workforce about modern slavery and provide them with the tools to help them identify potential risks, or the actual presence, of modern slavery in our supply chains. This included delivering a presentation to over 100 Asia-Pacific employees as part of a monthly business update and holding targeted modern slavery training for people in roles that interact with supply chain partners across all Graymont functions including procurement, sales, logistics, operations, human resources, engineering, geology and maintenance excellence.

The training focused on increasing knowledge and awareness of what constitutes modern slavery, Graymont's obligations under the Modern Slavery Act, how Graymont is assessing and managing the risk of modern slavery in our day-to-day business practices and throughout our supply chain, and importantly, what our people can do to support Graymont's efforts to eradicate modern slavery. A key outcome of the training was to enhance people's understanding of the risks of modern slavery and the signals that might indicate the presence of modern slavery, helping them work with our supply chain partners on this important issue, increasing their vigilance, and coaching them on what to do if they identify areas of potential concern.





## SUPPLIER DUE DILIGENCE QUESTIONNAIRE

In 2021 Graymont developed a supplier due diligence questionnaire that strengthens the due diligence practices already in place to identify and assess any actual or potential human rights impacts in our operations and supply chains. The questionnaire was designed with a partnership approach in mind and is intended to help improve Graymont’s ability to recognise and appropriately respond to modern slavery risks. Graymont recognises the importance of working with our key supply partners to eradicate any potential modern slavery risks, and using our values and influence to drive positive change. To this end, the questionnaire is not designed to eliminate suppliers with potential modern slavery risks or practices. Instead, it is designed to identify any inappropriate practices and to work with the supplier to ensure the risk is understood and appropriately mitigated.

The due diligence questionnaire will be formally launched in 2022. Graymont will take a risk-based approach to progressively implement the questionnaire across our supply chains. The working group has started by identifying potential higher-risk industries and will initially require suppliers in these areas to complete the questionnaire, with suppliers in lower-risk areas being added later as Graymont continues to expand the roll out of the questionnaire. The implementation process for the due diligence questionnaire is discussed further below in the section titled ‘Future Actions for Continuous Improvement’ commencing on page 15 of this Modern Slavery Statement.



## ENHANCED CONTRACTUAL PROTECTIONS

As part of Graymont's 2020 Modern Slavery Statement it was noted Graymont intends to build in enhanced contractual protections going forward. In early 2021 a detailed review of Graymont's contract suite was completed to ensure contracts were providing sufficient protection, allowing Graymont to assess compliance and in turn identify suppliers of greater risk. As part of this review, Graymont also looked at the requirements of sub-contractors to agree, at a minimum, to comply with the obligations under the contract between Graymont and our direct counterparty.

Following a review of the contractual templates they now all include a clear requirement to comply with relevant laws as well as contain termination rights and audit rights. Further, where Graymont is using a supplier's documentation, we seek to build in the same requirements. Graymont has found counterparties to be extremely receptive of these provisions, as they apply equally to both parties, ensuring Graymont is not putting an obligation on a supplier that we are not willing to meet ourselves.

Going forward, as previously executed agreements come up for renewal, we will look to make the necessary amendments to include these enhanced contractual protections. While Graymont acknowledges that a contractual provision alone does not guarantee compliance, it is seen as an important step in building awareness amongst our business partners of human rights risks and our expectations that they identify and address them.

## EQUITY, DIVERSITY AND INCLUSION STATEMENT OF PRINCIPLES

The principles of equity, diversity and inclusion (“EDI”) are important for ensuring everyone, regardless of who they are or what they do for the business, feels equally involved in and supported in all areas of the workplace. In 2021 Graymont developed an EDI Statement of Principles to guide our ongoing efforts to foster equity, diversity, and inclusion at Graymont. These complement Graymont’s values and existing policies such as the Code of Business Conduct and Ethics. An EDI Action Plan was also developed to deliver on our commitments and ensure that the EDI Statement of Principles is upheld.

While Graymont’s EDI Statement of Principles and EDI Action Plan refer to employees and the employment life cycle, the principles of equity, diversity and inclusion are fundamental for ensuring that we recognize and respect the human rights of everyone we interact with on behalf of Graymont. This includes our supply chain partners and colleagues in the workplace who are directly employed by labor hire agencies and who may also be foreign workers. The EDI Statement of Principles fosters a culture where honest feedback is sought to better understand the experience of people with diverse backgrounds at Graymont and where each person feels their unique perspective is heard and valued.

Proactive EDI activities, combined with Graymont’s Respectful Workplace Policy and associated training helps ensure a respectful workplace that is free from discrimination, harassment, bullying, victimization, violence, or retaliation of any kind. This in turn supports Graymont’s efforts to address the risk of modern slavery by increasing awareness of the types of behaviors that may cause offense, reinforcing Graymont’s values, and reinforcing the importance of reporting inappropriate behaviors, thereby building the leadership, courage and commitment required at all levels of our business to identify, report, and help to eliminate modern slavery risks and practices.

A copy of Graymont’s Equity, Diversity and Inclusion Statement of Principles is available on the Graymont website at <https://www.graymont.com/en/about-us/mission-vision-values>.

## GLOBAL PROCUREMENT TEAM

Graymont’s global procurement team, established in 2020, continued to grow in 2021. Collectively, this global team has extensive procurement experience assisting to drive world class procurement practices across Graymont’s operations. The global procurement lead has played a key role in Graymont’s modern slavery working group. The procurement team is integral to Graymont’s work to prevent modern slavery in supply chains, from conducting risk assessments, engaging with suppliers, ensuring contracts are in place and reviewing the effectiveness of actions taken. Further, this team plays a key role in educating suppliers, consultants, agents and partners about Graymont’s expectations in respect to ensuring modern slavery is eliminated from global supply chains.



# Future Actions for Continued Improvement

**As a company we strive for continued improvement in everything we do and this approach applies equally to our efforts to eradicate modern slavery. Graymont continues to explore ways to better identify and act on risks within our supply chains. We have committed to implementing the following key actions in 2022 that build on our ongoing work to address the risk of modern slavery:**

## **E-LEARNING MODULE**

In 2022 Graymont will establish a modern slavery e-learning module which can be undertaken by Graymont staff to help them understand Graymont's efforts to help put an end to modern slavery, including our goals, expectations, priority focus areas and how they can support Graymont in this journey. This module will complement other e-learning training content that Graymont has provided our people including with respect to fostering a respectful workplace and our standards of business conduct and ethics. The upcoming modern slavery e-learning module will help our people support our drive for world class performance.

Graymont comprises a talented team of engaged individuals who are empowered to speak up and stop practices that do not align with Graymont's values. With our One Graymont culture every employee contributes, as individuals and as team members, to understanding and meeting the expectations of our stakeholders and collaborating to deliver world class performance. Central to this is ensuring we provide strong development for our people on new topics and initiatives to enable them to deliver outcomes that align with new and emerging expectations. Through the introduction of a modern slavery e-learning module in 2022, Graymont can ensure increased awareness of this important topic while also arming our employees with the tools and knowledge they need to drive positive change in this area.

## **EMPLOYEE ONBOARDING PROGRAM**

All new employees at Graymont participate in an onboarding program. This is a structured way to help new employees quickly become a value-adding member of the Graymont team. Through the onboarding program they learn about Graymont's culture and current strategies, whilst getting to know their fellow team members and the key priorities and objectives of their function. Onboarding provides an opportunity to create alignment on purpose by being clear about the individual's role responsibilities and performance expectations, learn more about Graymont's policies, processes, and initiatives, and commence development planning which includes completing relevant e-learning modules. Our onboarding program is flexible, enabling new relevant content to be delivered.

In 2022 modern slavery content will be added to the onboarding program to inform our new employees of the key role Graymont plays in helping to eradicate modern slavery from global supply chains and how they can assist Graymont to achieve this.

## MODERN SLAVERY POSTER

To promote further awareness within Graymont of the existence of modern slavery and the potential risk within supply chains, an awareness poster will be created in 2022 for display at Graymont's operations and offices in Australia. The modern slavery working group will collaborate with each site to develop a communication plan to complement the roll-out of the posters. The campaign will focus on a clear definition of modern slavery, illustrate the prevalence of modern slavery in global supply chains and note Graymont's commitment to eradicating modern slavery. The awareness campaign will complement Graymont's modern slavery education and training programs and will promote Graymont's Ethics Reporting System.

## DUE DILIGENCE QUESTIONNAIRE IMPLEMENTATION

As outlined earlier, a supplier due diligence questionnaire was developed in 2021 to identify and assess the risks of modern slavery. Taking a risk-based approach, the questionnaire will initially be used to evaluate suppliers who operate in the geographies, sectors and industries of concern due to their higher modern slavery risk.

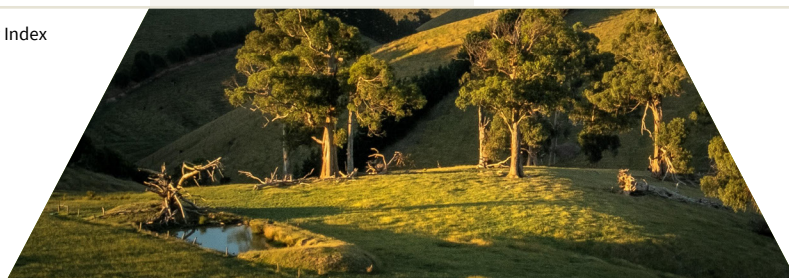
The below tables set out information extracted from the Global Slavery Index that we have used to help us evaluate the relative modern slavery risk associated with our various suppliers. This information includes the four key countries in the Asia Pacific region with which Graymont primarily trades and the estimated prevalence of modern slavery in each of these countries, as well as some of the sectors and industries that were identified in 2020 as posing a higher risk of modern slavery practices. Graymont will utilise this information to conduct a targeted, phased roll out of our due diligence questionnaire in 2022.

In addition to rolling this out with existing supply partners, going forward the due diligence questionnaire will be incorporated into Request for Information (RFI) documents which are used to solicit specific responses from potential suppliers. The three most common RFI request documents used by Graymont are Request for Information, Request for Quote and Request for Proposal.

Throughout future years, Graymont will continue to roll the due diligence questionnaire out more and 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.

Country	Global Slavery Index 2018 Regional Ranking (Asia Pacific)	Estimated Prevalence of Modern Slavery Victims (per 1,000 Population)	Estimated Absolute Number of Victims of Modern Slavery
Philippines	12	7.7	784,000
Malaysia	14	6.9	212,000
Australia	25	0.6	15,000
New Zealand	26	0.6	3,000

Source: Global Slavery Index



Sector / Industry	Good or Service with Risk of Modern Slavery
Extractive Industry Sector	Raw materials used in processing operations
Manufacturing	Heavy machinery and equipment, repair and maintenance supplies, and packaging
Transport and Logistics	Sea and land freight services used for transporting product
Consumables (non-production)	Personal protective equipment supplied to employees
Bulk Materials	Fuels and biofuel
Security and Cleaning	Security and cleaning companies servicing mine sites and corporate offices

The Global Slavery Index Regional Ranking is based on the Estimated Prevalence of Modern Slavery Victims per 1,000 Population (from most prevalent to least prevalent). The higher the rank, the higher the risk of Modern Slavery.

## GLOBAL HEALTH AND SAFETY WORKPLACE PLATFORM FOR CONTRACTOR AND CARRIER MANAGEMENT

In 2021 Graymont engaged Avetta as our global health and safety workplace platform provider for contractor and carrier management. Avetta is a global organisation with strong credentials in this important area. Graymont's objective is to globally implement a universal system that strengthens governance of our contractor and carrier partners including in the areas of standardisation, e-Learning, e-documentation of site inductions, and validation of insurance requirements. Avetta provides comprehensive contractor management functionality and Graymont and Avetta have planned out several phases of the project to implement the system.

Once Phase I of the contractor and carrier management platform provided by Avetta has been implemented, it is intended that key elements of the modern slavery due diligence questionnaire will be included in the supplier assessment criteria that are built into the platform.





# 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 2021 Graymont focused on implementing steps to address modern slavery risks in our direct supply chains 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 15 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 gain a more detailed understanding of our indirect supply chains.

## 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 behaviours 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 <https://www.graymont.com/en/about-us/mission-vision-values>.

## ETHICS REPORTING SYSTEM

Graymont acknowledges the importance of providing avenues for stakeholders 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, by telephone or via mail with local numbers provided for each country in which Graymont operates.

We encourage our employees and suppliers to take advantage of the Ethics Reporting System and 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 2021 Graymont conducted a number of tailored audits where areas of potential concern had been identified. These audits were conducted by both Graymont personnel and third parties and included an assessment of potential modern slavery risks. 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 to identify further opportunities to support suppliers to meet Graymont's standards over and above compliance. We will continue to use tailored audits where potential concerns and areas of improvement have been identified.

Going forward, Graymont will seek to further build out our audit program in order to better assess the effectiveness of measures we have put in place to address the risk of modern slavery.

## 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 chains, 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 2022 include:**

- ▶ Development of a Modern Slavery e-learning module
- ▶ Incorporating Modern Slavery into our Employee Onboarding Program
- ▶ Further promoting awareness, including via a Modern Slavery Poster
- ▶ Implementing our targeted Supplier Due Diligence Questionnaire
- ▶ Continuing the implementation 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 goal of eradicating modern slavery from our supply chains.

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



John McBride  
President, Asia Pacific







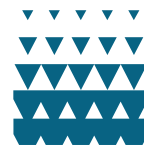
## **CONTACT US**

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 environmental stewardship, workplace health and safety and stakeholder relations, and we welcome your comments and feedback.

Communications should be directed to:

Email: [ehs@graymont.com](mailto:ehs@graymont.com)

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



**GRAYMONT**

[graymont.com](http://graymont.com)