



The GrainCorp Limited (“GrainCorp”) Supplier Code of Conduct (“Code”) outlines the standards and principles that we expect our suppliers (and a supplier’s next tier suppliers) (“the Supplier”) to adhere to when conducting business with GrainCorp.

This Code is supplementary to any agreement or arrangement between a Supplier and GrainCorp, and it is the responsibility of the Supplier to ensure compliance with the Code.

1. INTRODUCTION

GrainCorp’s corporate and social commitments are set out in its Code of Conduct and related Policy Statements (Modern Slavery, Safety & Health, and Environment) available on the Company’s website.

When Suppliers do business with GrainCorp, we expect them to:

- Comply with all relevant and applicable laws and regulations in the countries within which they operate
- Endeavour to meet international and industry guidelines, standards and best practice, and
- Implement systems, processes and controls to:
 - Protect the environment
 - Respect human rights
 - Prohibit modern slavery labour practices
 - Prohibit child labour
 - Ensure reasonable working hours and wages
 - Provide a safe working environment
 - Act lawfully and with integrity
 - Adequately manage grievances

2. PROTECTION OF THE ENVIRONMENT

GrainCorp is committed to minimising its environmental impact and stewarding the resources of the earth for future generations. We require our Suppliers to adhere to the spirit and intent of our commitment. We expect our Suppliers to demonstrate compliance with this requirement by:

- Being compliant with all environment laws and regulations relevant to a Supplier’s business;
- Taking reasonable steps to improve resource efficiency, by addressing waste and pollution, and the use of water, gas and other natural resources;
- Minimising the use of chemicals and substances which may be harmful to the environment

3. RESPECT FOR HUMAN RIGHTS

Respect for human rights is fundamental to our values, and GrainCorp is committed to complying with the labour rights, standards, legislation and statutory requirements in the countries in which we operate. This includes equality and diversity in employment, anti-discrimination, and ‘zero tolerance’ against violence, sexual harassment, bullying, vilification and victimisation in the workplace.

We require our Suppliers to adhere to this commitment and demonstrate compliance with this requirement by:

- Being compliant with all labour standards, laws and regulations relevant to a Supplier’s business;
- Ensuring all of its employees and contractors are free from bullying, harassment, or victimisation;
- Preventing discrimination on the basis of race, age, gender, sexual preferences, religious or political beliefs, disability and impairment or marital status;

4. PROHIBIT MODERN SLAVERY LABOUR PRACTICES

Slavery, servitude, human trafficking and forced and bonded labour represent grave human rights abuses, and GrainCorp’s approach is one of zero tolerance. GrainCorp is committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or supply chain.

We require our Suppliers to adhere to this commitment and demonstrate compliance with this requirement by:



- Ensuring it maintains records of all employees and contractors, documenting: wages or fees paid, age, visas and legal right to work verification;
- Ensuring all individuals working on behalf of the Supplier are provided with a documented employment agreement that states employment is voluntary, and individuals are free to exit their employment at a time of their own choosing;
- Ensuring workers are not obligated to hand over their identification documents, or provide deposits to the Supplier, and may leave their employment of their own free will.

5. PROHIBIT CHILD LABOUR

Child labour is a gross human rights abuse. GrainCorp is committed to ensuring that child labour does not exist in its business operations or supply chain, in accordance with the International Labour Organisation Convention 138 and Convention 182, which require that no child below the age of 15 years (or 14 years in some circumstances) is engaged in work, subject to certain exceptions allowed by law. We require our Suppliers to adhere to this commitment and demonstrate compliance with this requirement by:

- Ensuring child labour is strictly prohibited in its operations and supply chain;
- Ensuring strong age-verification processes and procedures are in place during recruitment;
- Maintaining records of any workers under the age of 18 years;
- Establishing processes, systems and controls to identify child labour practices, and implement remediation procedures should child labour be identified.

GrainCorp acknowledges that there are circumstances where children may assist with tasks on their family farm or other agricultural enterprise – work of that nature is not prohibited by this Code, as long as the work does not adversely impact the child's safety, health and well-being, or education. A child's involvement in this work must be adequately supervised by an adult, and the child must be trained in those tasks.

6. REASONABLE WORKING HOURS & WAGES

The number of hours worked, and the wages and benefits received, by a Supplier's employees must comply with all relevant laws, standards or agreements of the countries in which our Suppliers operate. GrainCorp expects that a Supplier's employees are paid sufficiently to meet basic needs, and that overtime hours worked are voluntary.

We require our Suppliers to demonstrate compliance with this requirement by:

- Ensuring employees are informed in a clear and transparent manner of the working hours expected of their role;
- Ensuring total hours worked (including overtime) is not excessive and beyond acceptable norms;
- Endeavour to pay employees a living wage and provide an adequate level of discretionary income.

7. PROVIDE A SAFE WORKING ENVIRONMENT

The safety, health and welfare of employees, contractors and visitors is extremely important to GrainCorp, and the company is committed to a culture of zero harm. GrainCorp will comply with applicable workplace health and safety laws in all jurisdictions in which the company operates. GrainCorp has implemented systems, processes and controls to ensure all people that interact with our business are provided a safe working environment. We require our Suppliers to adhere to the intent of our commitment and demonstrate compliance by:

- Ensuring safety and health risk assessments are undertaken, with mitigating controls implemented;
- Ensuring incident and near-miss records are adequately maintained, including corrective action plans;
- Where relevant, ensuring accommodation / lodgings are clean, safe and sanitary;
- Ensuring strong fire safety and preventive maintenance processes in place and regularly reviewed; and
- Ensuring employees have access to adequate medical assistance as required.

8. ACT LAWFULLY & WITH INTEGRITY

GrainCorp strives to meet the highest ethical standards in all of our business dealings. In all jurisdictions in which we operate there are laws, codes, standards and regulations that govern our work practices, business transactions and the



manner in which we conduct ourselves in most daily interactions. We expect our employees and contractors to be aware of the laws, codes, standards and regulations which govern our work practices and ensure that they do not engage in offending conduct.

We require our Suppliers to adhere to this commitment and demonstrate compliance by:

- Ensuring that the Supplier and its employees do not engage in bribery, corruption or fraud, and that appropriate policy and procedures are in place to mitigate such acts from occurring;
- Ensuring a mechanism is established whereby employees or contractors can confidentially report suspected unethical business practices, and that appropriate processes are established to investigate and resolve any identified issues.

9. ADEQUATELY MANAGE GRIEVANCES

GrainCorp is committed to protecting the identity of individuals that wish to report confidentially, and in good faith, concerns or complaints regarding suspected breaches of the GrainCorp Code of Conduct. Our Whistleblower Policy and Procedure sets out how individuals can confidentially disclose or report information, and how such matters can be handled. We require our Suppliers to adhere to the intent of our commitment.

We expect our Suppliers to demonstrate compliance with this requirement by:

- Putting in place a confidential mechanism across multiple communication channels that allows for grievances, concerns or suggestions to be raised by employees, contractors and Suppliers;
- Ensuring adequate policies and procedures are established to report, investigate and resolve grievances in a confidential manner; and
- Ensuring there is a process to appeal a decision, conclusion or finding following an investigation of a reported grievance.

10. REPORTING & COMPLIANCE

Suppliers are required to report any suspected violations of regulations, laws and/or this Code to GrainCorp.

GrainCorp may take steps to assess a Supplier's compliance with this Code, which may involve independent external auditors or other third-parties.