

2020 - 21 Compliance Program

Submitted by:

**Graincorp Operations Limited
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#Workplace overview

Policies and strategies

1: Do you have a formal policy and/or formal strategy in place that specifically supports gender equality in the following areas?

...Recruitment	Yes(<i>Select all that apply</i>)
...Yes	Policy Strategy
...Retention	Yes(<i>Select all that apply</i>)
...Yes	Strategy
...Performance management processes	Yes(<i>Select all that apply</i>)
...Yes	Policy Strategy
...Promotions	Yes(<i>Select all that apply</i>)
...Yes	Policy Strategy
...Talent identification/identification of high potentials	Yes(<i>Select all that apply</i>)
...Yes	Policy Strategy
...Succession planning	Yes(<i>Select all that apply</i>)
...Yes	Policy Strategy
...Training and development	Yes(<i>Select all that apply</i>)
...Yes	Policy Strategy
...Key performance indicators for managers relating to gender equality	Yes(<i>Select all that apply</i>)
...Yes	Policy Strategy

2: Do you have formal policy and/or formal strategy in place that support gender equality overall?

Yes(*Select all that apply*)

...Yes	Policy Strategy
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3: If your organisation would like to provide additional information relating to your gender equality policies and strategies, please do so below.

Various strategies and policies support GrainCorp's commitment to equality, diversity and inclusion including:

- GrainCorp's Diversity & Inclusion Strategy focuses on ensuring a culture of inclusion, cognitive diversity and collaboration. Supporting this strategy, we have identified activities, initiatives and success measures that support gender equality and increase the representation of women in all roles but particularly those of influence.

- GrainCorp's Preventing Harassment and Bullying in the Workplace Policy reinforces our commitment to decisions that are transparent, fair, and non-discriminatory relating to people (recruitment, development, work allocation, remuneration, promotions and leave arrangements).

- GrainCorp's Remuneration Policy states one of our key principles of remuneration philosophy as; "*all frameworks, remuneration management processes and programs will be developed and monitored to ensure they are gender neutral, non-discriminatory and free from bias*".

Policies and procedures are reviewed regularly to support the achievement of these goals and to ensure they are inclusive and free from biases.

Governing bodies

Graincorp Operations Limited

1: Does this organisation have a governing body?	Yes, same as local ultimate parent organisation(<i>The local ultimate parent's governing body details must be reported against the local ultimate parent. The information is not required to be entered again for subsidiary organisations even if it is reported in a different submission group.</i>)
11.1: Confirm how the ultimate parent's governing body/ies are being reported:	It is reported as part of this submission group.

Graincorp Limited

1: Does this organisation have a governing body?	Yes(<i>Provide further details on the governing body(ies) and its composition</i>)
1.1: What is the name of your governing body?	Graincorp Board of Directors
1.2: What type of governing body does this organisation have?	Board of directors
1.3: How many members are on the governing body and who holds the predominant Chair position?	
...Chairs	
...Female (F)	
...Male (M)	1
...Gender X	0
...Members	
...Female (F)	1
...Male (M)	2
...Gender X	0

1.4: Do you have a formal selection policy and/or formal selection strategy for this organisation's governing body members?	Yes(<i>Select all that apply</i>)
	Policy
1.5: Has a target been set to increase the representation of women on this governing body?	Yes(<i>Provide further details on your target</i>)
10.6: What is the percentage (%) target?	30.00%
10.7: What year is the target to be reached (select the last day of the target year)?	31-Mar-2023

2: If your organisation would like to provide additional information relating to governing bodies and gender equality in your workplace, do so below.

GrainCorp has 25% female representation on our Board. GrainCorp supports the need for increased female representation on public company boards, and in doing so, will continue to identify suitably qualified women for appointment to the GrainCorp Board.

#Action on gender equality

Gender pay gaps

1: Do you have a formal policy and/or formal strategy on remuneration generally?

Yes(*Select all that apply*)

...Yes

Policy
Strategy

1.1: Are specific pay equity objectives included in your formal policy and/or formal strategy?

Yes(*Select all that apply*)

...Yes

To achieve gender pay equity
To ensure no gender bias occurs at any point in the remuneration review process (for example at commencement, at annual salary reviews, out-of-cycle pay reviews, and performance reviews)
To implement and/or maintain a transparent and rigorous performance assessment process

2: Did your organisation receive JobKeeper payments?

No

3: What was the snapshot date used for your Workplace Profile?

31-Mar-2021

4: If your organisation would like to provide additional information relating to gender pay gaps in your workplace, please do so below.

Employer action on pay equity

1: Have you analysed your payroll to determine if there are any remuneration gaps between women and men (e.g. conducted a gender pay gap analysis)?

Yes(*Provide further details on the most recent gender remuneration gap analysis that was undertaken.*)

1.1: When was the most recent gender remuneration gap analysis undertaken?

Within the last 12 months

1.2: Did you take any actions as a result of your gender remuneration gap analysis?

No(*Select all that apply*)

...No

No unexplained or unjustifiable gaps identified

1.3: You may provide details below on the type of gender remuneration gap analysis that has been undertaken (for example like-for-like and/or organisation-wide)

A like for like pay equity review was carried out during the review period and confirmed that there were no identifiable outliers that were outside of 2 standard deviations from our internal pay positioning.

2: If your organisation would like to provide additional information relating to employer action on pay equity in your workplace, please do so below.

Pay equity (including gender) remains a focus at GrainCorp and is monitored and addressed throughout the employment lifecycle. GrainCorp's remuneration is structured on fixed and variable pay frameworks. Fixed remuneration is determined using an internationally recognised job evaluation methodology that removes gender differentiation. Our reward strategy (variable pay) is modelled on a market-based approach which limits potential gender bias. Compensation is linked to performance factors including the performance of GrainCorp as a whole, the relevant business unit and individual achievements. As such, GrainCorp's remuneration framework continues to ensure fairness and equity across the organisation.

Employee consultation

1: Have you consulted with employees on issues concerning gender equality in your workplace?
Yes(*Provide further details on the employee consultation process.*)

1.1: How did you consult employees?

Consultative committee or group
Exit interviews

1.2: Who did you consult?

Human resources managers
Diversity committee or equivalent

2: If your organisation would like to provide additional information relating to employee consultation on gender equality in your workplace, please do so below.

Ongoing consultation with the GrainCorp HR and Organisational Development teams identify opportunities and risks relating to diversity and inclusion. This also informs people plan development, progress of initiatives and adherence to policies relevant to diversity & inclusion. This process is informed by the ongoing consultation HR undertakes with leaders, managers and employees across the business through channels such as leadership team meetings, 1:1 discussion, hiring and promotion processes, talent management discussions, onboarding and exit interviews and employee surveys.

During the reporting period, development of enhanced data collection and analysis has provided greater insight of our business diversity, including gender.

Following the appointment of a new CEO and executive team members, a more action focused approach to D&I has been launched in the shape of our Inclusion and Diversity Action Plan (iDAP). This approach empowers all GrainCorp employees with increased awareness and understanding of the activities and events. The iDAP connects GrainCorp employees as part of a single team to support the inclusion, retention, engagement, development and productivity of specific under-represented groups across the business, including gender.

An all-business employee survey was conducted during the reporting period. Results are analysed to determine any significant differences in favourable responses between men and women (and other demographic groups) regarding overall satisfaction, advocacy, autonomy, leadership, work-life balance, and inclusion. Enterprise action plans will be developed to address any differences.

#Employee work/life balance

Flexible working

1: Do you have a formal policy and/or formal strategy on flexible working arrangements?

Yes(*Select all that apply*)

...Yes	Policy Strategy
...A business case for flexibility has been established and endorsed at the leadership level	Yes
...Leaders are visible role models of flexible working	Yes
...Flexible working is promoted throughout the organisation	Yes
...Targets have been set for engagement in flexible work	No(<i>Select all that apply</i>)
...No	Not aware of the need
...Targets have been set for men's engagement in flexible work	No(<i>Select all that apply</i>)
...No	Not aware of the need
...Leaders are held accountable for improving workplace flexibility	No(<i>Select all that apply</i>)
...No	Not aware of the need
...Manager training on flexible working is provided throughout the organisation	Yes
...Employee training is provided throughout the organisation	Yes
...Team-based training is provided throughout the organisation	No(<i>Select all that apply</i>)
...Employees are surveyed on whether they have sufficient flexibility	Yes
...The organisation's approach to flexibility is integrated into client conversations	No(<i>Select all that apply</i>)
...The impact of flexibility is evaluated (e.g. reduced absenteeism, increased employee engagement)	Yes
...Metrics on the use of, and/or the impact of, flexibility measures are reported to key management personnel	No(<i>Select all that apply</i>)
...No	Not aware of the need

...Metrics on the use of, and/or the impact of, flexibility measures are reported to the governing body	No(<i>Select all that apply</i>)
...No	Not aware of the need
...Other (provide details)	No

2: Do you offer any of the following flexible working options to MANAGERS in your workplace?

...Flexible hours of work	Yes(<i>Select one option only</i>)
...Yes	SAME options for women and men(<i>Select all that apply</i>)
...SAME options for women and men	Formal options are available Informal options are available
...Compressed working weeks	Yes(<i>Select one option only</i>)
...Yes	SAME options for women and men(<i>Select all that apply</i>)
...SAME options for women and men	Formal options are available Informal options are available
...Time-in-lieu	Yes(<i>Select one option only</i>)
...Yes	SAME options for women and men(<i>Select all that apply</i>)
...SAME options for women and men	Informal options are available
...Telecommuting (e.g. working from home)	Yes(<i>Select one option only</i>)
...Yes	SAME options for women and men(<i>Select all that apply</i>)
...SAME options for women and men	Formal options are available Informal options are available
...Part-time work	Yes(<i>Select one option only</i>)
...Yes	SAME options for women and men(<i>Select all that apply</i>)
...SAME options for women and men	Formal options are available
...Job sharing	Yes(<i>Select one option only</i>)
...Yes	SAME options for women and men(<i>Select all that apply</i>)
...SAME options for women and men	Formal options are available
...Carer's leave	Yes(<i>Select one option only</i>)
...Yes	SAME options for women and men(<i>Select all that apply</i>)
...SAME options for women and men	Formal options are available
...Purchased leave	Yes(<i>Select one option only</i>)
...Yes	SAME options for women and men(<i>Select all that apply</i>)
...SAME options for women and men	Formal options are available
...Unpaid leave	Yes(<i>Select one option only</i>)

...Yes	SAME options for women and men(<i>Select all that apply</i>)
...SAME options for women and men	Formal options are available

3: Are your flexible working arrangement options for NON-MANAGERS the same as the options for managers above?

Yes

4: Were managers in your organisation allowed to make INFORMAL flexible working arrangements with their team members in response to the COVID-19 pandemic?

Yes, ALL managers

5: Did you see an increase, overall, in the approval of FORMAL flexible working arrangements for your workforce compared to pre-COVID-19?

Yes, for both women and men

6: If your organisation would like to provide additional information relating to flexible working and gender equality in your workplace, please do so below.

GrainCorp recognises that our people have priorities both within and outside the workplace, and that achieving a healthy balance is important. GrainCorp's Flexible Work Policy and guidelines demonstrate our commitment to providing all employees with flexible working arrangements where possible including working from home, altered working patterns and reduced hours working. Our Flexible Working Policy was reviewed and enhanced prior to COVID19 and has been essential to transitioning back to the workplace as part of a hybrid model.

In addition to terms, conditions and practices, we have additional/delete duplication practices in place to support flexible working arrangements, employees experiencing domestic violence and those with carers responsibilities which include:

- * Core meeting hours between 10am and 4pm, Monday to Friday;
- * Provision of up to 2 weeks unpaid leave, where an employee has exhausted their paid personal or carer's leave balance and is required to care for immediate family or household members;
- * Extended parental leave up to a further 52wks following the initial period (where reasonable);
- * Purchased Leave program to enable staff to purchase additional leave to be utilised throughout the year;
- * Leave without pay is available for special circumstances where employees have more than 12 months continuing service; and
- * Our Employee Assistance Program (EAP).

With the changing landscape during the pandemic, we experienced a relatively straightforward passage to remote working with additional support tools and training available to all employees. With the subsequent return to the workplace this was conducted

on a flexible basis with employees encouraged to work with their manager to agree a hybrid approach. The use of a hybrid working model has also enabled GrainCorp to react quickly to changing circumstances and pandemic restrictions on an ongoing basis.

We seek feedback from employees as part of our Employee Survey regarding their awareness and utilisation of flexible working at GrainCorp.

#Employee support

Paid parental leave

1: Do you provide employer funded paid parental leave regardless of carer's status (i.e. primary/secondary) in addition to any government funded parental leave scheme?

Yes, we offer employer funded parental leave (using the primary/secondary carer definition)

1.1: Do you provide employer funded paid parental leave for primary carers in addition to any government funded parental leave scheme?	Yes(<i>Please indicate how employer funded paid parental leave is provided to the primary carers.</i>)
1.1.a: Please indicate whether your employer-funded paid parental leave for primary carers is available to:	All, regardless of gender
1.1.b: Please indicate whether your employer-funded paid parental leave for primary carers covers:	Birth Adoption Surrogacy
1.1.c: How do you pay employer funded paid parental leave to primary carers?	Paying the employee's full salary
1.1.d: Do you pay superannuation contribution to your primary carers while they are on parental leave?	Yes, on employer funded parental leave
1.1.e: How many weeks (minimum) of employer funded paid parental leave for primary carers is provided?	14
1.1.f: What proportion of your total workforce has access to employer funded paid parental leave for primary carers, including casuals?	71-80%
1.2: Do you provide employer funded paid parental leave for secondary carers in addition to any government funded parental leave scheme?	Yes(<i>Please indicate how employer funded paid parental leave is provided to the secondary carers.</i>)
1.2.a: Please indicate whether your employer-funded paid parental leave for secondary carers is available to:	All, regardless of gender
1.2.b: Please indicate whether your employer-funded paid parental leave for secondary carers covers:	Birth Adoption Surrogacy
1.2.c: How do you pay employer funded paid parental leave to secondary carers?	Paying the employee's full salary

1.2.d: Do you pay superannuation contribution to your secondary carers while they are on parental leave?	Yes, on employer funded parental leave
1.2.e: How many weeks (minimum) of employer funded paid parental leave for secondary carers is provided?	2
1.2.f: What proportion of your total workforce has access to employer funded paid parental leave for secondary carers, including casuals?	70-80%

2: If your organisation would like to provide additional information relating to paid parental leave and gender equality in your workplace, please do so below.

91-100% of permanent workforce has access to paid parental leave. The reason for the lower amount specified above is due to a vast amount of seasonal labour at the time of the report end period.

GrainCorp provides unpaid leave for Stillbirth parents if pregnancy ends after 12 weeks.

The parental leave provisions within GrainCorp's Leave Policy and Procedures enable both men and women to take paid primary and secondary carers' leave. For primary carers parental leave can be taken at full or half pay to be determined by the employee providing flexibility. The amount of paid leave available to secondary carers has also been increased. Superannuation continues to be paid on all forms of paid parental leave with up to 14 weeks counting towards an employee's continuous service.

Support for carers

1: Do you have a formal policy and/or formal strategy to support employees with family or caring responsibilities?

Yes(Select all that apply)

...Yes	Policy Strategy
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2: Do you offer any of the following support mechanisms for employees with family or caring responsibilities?

...Employer subsidised childcare	No(You may specify why the above support mechanism is not available to your employees.)
...No	Not aware of the need
...On-site childcare	No(You may specify why the above support mechanism is not available to your employees.)
...No	Other (provide details)
...Other (provide details)	Due to number and location of sites
...Breastfeeding facilities	Yes(Please indicate the availability of this support mechanism.)
...Yes	Available at SOME worksites

...Childcare referral services	No(<i>You may specify why the above support mechanism is not available to your employees.</i>)
...No	Not aware of the need
...Internal support networks for parents	No(<i>You may specify why the above support mechanism is not available to your employees.</i>)
...No	Not aware of the need
...Return to work bonus (only select if this bonus is not the balance of paid parental leave)	No(<i>You may specify why the above support mechanism is not available to your employees.</i>)
...No	Not aware of the need
...Information packs for new parents and/or those with elder care responsibilities	Yes(<i>Please indicate the availability of this support mechanism.</i>)
...Yes	Available at ALL worksites
...Referral services to support employees with family and/or caring responsibilities	Yes(<i>Please indicate the availability of this support mechanism.</i>)
...Yes	Available at ALL worksites
...Targeted communication mechanisms (e.g. intranet/forums)	No(<i>You may specify why the above support mechanism is not available to your employees.</i>)
...No	Currently under development(<i>Select the estimated completion date.</i>)
...Currently under development	
...Support in securing school holiday care	No(<i>You may specify why the above support mechanism is not available to your employees.</i>)
...No	Not aware of the need
...Coaching for employees on returning to work from parental leave	No(<i>You may specify why the above support mechanism is not available to your employees.</i>)
...No	Currently under development(<i>Select the estimated completion date.</i>)
...Currently under development	31-Mar-2022
...Parenting workshops targeting mothers	No(<i>You may specify why the above support mechanism is not available to your employees.</i>)
...No	Not aware of the need
...Parenting workshops targeting fathers	No(<i>You may specify why the above support mechanism is not available to your employees.</i>)
...No	Not aware of the need
...Other (provide details)	No

3: If your organisation would like to provide additional information relating to support for carers in your workplace, please do so below.

Paid and unpaid carers leave is available to GrainCorp permanent employees as stated within Leave Policy and

Procedures (reviewed March 2020) and allows carers to provide support to a member of the employee's immediate family, or a member of the employee's household, who requires care.

Unpaid carers leave is available to employees who have exhausted any accumulated paid personal leave and is determined based on individual circumstances.

Sex-based harassment and discrimination

1: Do you have a formal policy and/or formal strategy on sex-based harassment and discrimination prevention?

Yes (*Select all that apply*)

...Yes

Policy

1.1: Do you provide a grievance process in any sex-based harassment and discrimination prevention formal policy and/or formal strategy?

Yes

2: Do you provide training on sex-based harassment and discrimination prevention to the following groups?

...All managers

Yes (*Please indicate how often is this training provided (select all that apply):*)

...Yes

At induction
Every one-to-two years

...All employees

Yes (*Please indicate how often is this training provided (select all that apply):*)

...Yes

At induction
Every one-to-two years

3: If your organisation would like to provide additional information relating to sex-based harassment and discrimination, please do so below.

GrainCorp's Code of Conduct and Preventing Bullying & Harassment in the Workplace policy aims to prevent all forms of discrimination, harassment and bullying in the workplace, including sex-based harassment and discrimination.

All new employees (managers and non-managers) are required to complete the online 'Code of Conduct' and 'Preventing Bullying & Harassment' modules within their first 90 days as an employee. Seasonal labour employees are required to complete this learning prior to, or on their first day on employment.

Family or domestic violence

1: Do you have a formal policy and/or formal strategy to support employees who are experiencing family or domestic violence?

Yes (*Select all that apply*)

...Yes

Policy

2: Other than a formal policy and/or formal strategy, do you have the following support mechanisms in place to support employees who are experiencing family or domestic violence?

...Employee assistance program (including access to psychologist, chaplain or counsellor)	Yes
...Training of key personnel	Yes
...A domestic violence clause is in an enterprise agreement or workplace agreement	Yes
...Workplace safety planning	Yes
...Access to paid domestic violence leave (contained in an enterprise/workplace agreement)	No(<i>Select all that apply</i>)
...No	Not aware of the need
...Access to unpaid domestic violence leave (contained in an enterprise/workplace agreement)	Yes
...Access to paid domestic violence leave (not contained in an enterprise/workplace agreement)	No(<i>Select all that apply</i>)
...Access to unpaid leave	Yes
...Confidentiality of matters disclosed	Yes
...Referral of employees to appropriate domestic violence support services for expert advice	Yes
...Protection from any adverse action or discrimination based on the disclosure of domestic violence	Yes
...Flexible working arrangements	Yes
...Provision of financial support (e.g. advance bonus payment or advanced pay)	No(<i>Select all that apply</i>)
...No	Not aware of the need
...Offer change of office location	No(<i>Select all that apply</i>)
...No	Not aware of the need
...Emergency accommodation assistance	No(<i>Select all that apply</i>)
...No	Insufficient resources/expertise
...Access to medical services (e.g. doctor or nurse)	Yes
...Other (provide details)	No(<i>Select all that apply</i>)

3: If your organisation would like to provide additional information relating to family and domestic violence affecting your workplace, please do so below.

GrainCorp is committed to supporting permanent and casual employees who are experiencing family or domestic violence, protecting their employment, health and well-being

in a sensitive manner. GrainCorp's Leave Policy and Procedures include purchased annual leave and Family & Domestic Violence provisions and the enhancement of our parental leave offering.

Based upon the individual needs and circumstances of the employee, access to more forms of paid and unpaid leave of absence, including authorised leave of absence may be considered.

During the pandemic and enforced work from home additional measures were taken including the option to continue working in the stated workplace where appropriate. Additionally, support materials were made available and the Employee Assistance Program benefits were regularly communicated.