

**Modern Slavery Statement**  
2025



## Introduction

GrainCorp is a leading diversified Australian agribusiness, with an integrated operating model that connects growers to consumers around the world to provide food, feed and agri-energy products.

### In this Statement

About this Joint Modern Slavery Statement	3
Our Structure and Operations	4
Our People	6
Our Supply Chains	7
Identifying our Modern Slavery Risk	8
Policy and Governance	9
Due Diligence and Risk Management	10
Grievance Management and Remediation	12
Assessing the Effectiveness of Our Actions	13
Future Actions	14
Consultation with Controlled Entities	14
Statement Approval	14
Appendix A – Australian, UK and Canadian Reporting Comparison	15
Appendix B – Our Structure Mapped to Our Operations	16

### Acknowledgement of Country

GrainCorp acknowledges Aboriginal and Torres Strait Islander peoples as the First Peoples of Australia and embraces the spirit of reconciliation, working towards the equality of outcomes and ensuring an equal voice.

At GrainCorp we recognise, value and respect Aboriginal and Torres Strait Islander peoples' deep relationship, connection and responsibility to land, waterways and communities as central to identity and culture.

This report was produced on the lands of the Gadigal People of the Eora Nation and we specifically acknowledge the traditional custodians of the lands on which our businesses reside and operate.

We extend this recognition and respect to Indigenous peoples and communities around the world.



Aboriginal Artist and Graphic Designer Lani Balzan created the artwork for GrainCorp's Innovate RAP.

## About this Joint Modern Slavery Statement

This Modern Slavery Statement covers the period 1 October 2024 to 30 September 2025 (FY25 or Reporting Period) and is the sixth joint statement made in respect of GrainCorp Limited ACN 057 186 035 and the entities it owns or controls, that are reporting entities for the purposes of the Australian *Modern Slavery Act 2018* (Cth) (Australian Act). This Statement also serves as a Modern Slavery Transparency Statement in respect of our reporting obligations under the UK *Modern Slavery Act 2015* (UK Act) and the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canadian Act). A comparison of the Australian Act and the UK and Canadian Act's reporting requirements, and how GrainCorp has addressed these requirements is at Appendix A.

The term Modern Slavery used throughout this Statement includes all forms of human exploitation defined by each of the aforementioned Acts. The forms of exploitation and their definitions are available via the links below.

- Modern Slavery as defined by the [Australian Act](#)
- Modern Slavery as defined by the [UK Act](#)
- Child Labour and Forced Labour as defined by the [Canadian Act](#)

### The companies covered by this Statement are:

#### Australia

- GrainCorp Limited ACN 057 186 035;
- GrainCorp Services Limited ACN 050 099 146;
- GrainCorp Operations Limited ACN 003 875 401;
- GrainCorp Commodity Management (Holdings) Pty Ltd ACN 000 013 123;
- GrainCorp Oilseeds Pty Ltd ACN 006 772 578;
- GrainCorp Commodity Management Pty Ltd ACN 107 971 095;
- GrainCorp Oils Holdings Pty Ltd ACN 160 256 057;
- GrainCorp Nutrition and Energy Australia Pty Ltd ACN 160 258 677;
- Performance Feeds Pty Limited ACN 061 399 675;
- X F Enterprises (Australia) Pty Limited ACN 111 171 530;
- XF Australia Pty Ltd ACN 113 288 323;

#### United Kingdom

- GrainCorp Europe (UK) Limited CRN 07626308;
- Saxon Agriculture Limited CRN 03599544;

#### Canada

- GrainCorp Canada Inc. reg ID 8190372; and
- GrainCorp Operations Canada Inc. reg ID BC1056947.

(referred to together as **GrainCorp** in this Statement).

During the reporting period, GrainCorp engaged with each of the companies covered by this Statement and consulted the entities we own or control. GrainCorp's operations are described in the next section and have been mapped to the companies listed above at Appendix B.

#### Registered Office

Level 20, Tower 2  
International Towers  
200 Barangaroo Avenue  
Sydney NSW 2000 Australia

Tel: + 61 2 9325 9100  
Fax: + 61 2 9325 9180

#### Company website

[www.graincorp.com.au](http://www.graincorp.com.au)

## Our Structure and Operations

GrainCorp Limited is a public company, listed on the Australian Securities Exchange. GrainCorp is a leading Australian Agribusiness and processing company, with integrated operations across four continents and a proud history of delivering for customers for more than 100 years.

Grain receival sites throughout ECA

>160

Refining, bleaching, deodorising (RBD) capacity (kmt)

290

Oilseed crush capacity (kmt)

>500

Grain elevators and one port in western Canada

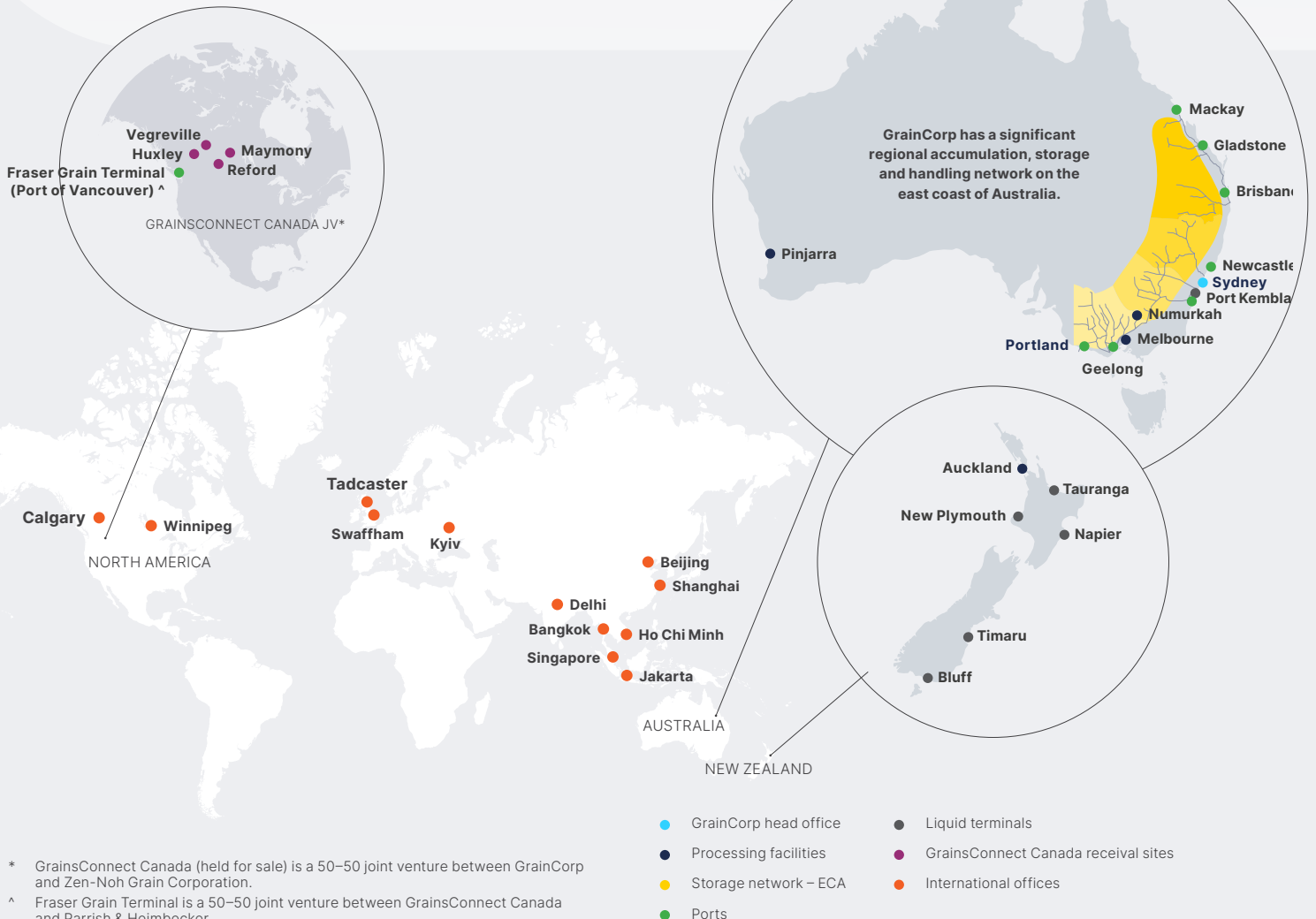
4

Ports across ECA

7

Marketing offices globally

12

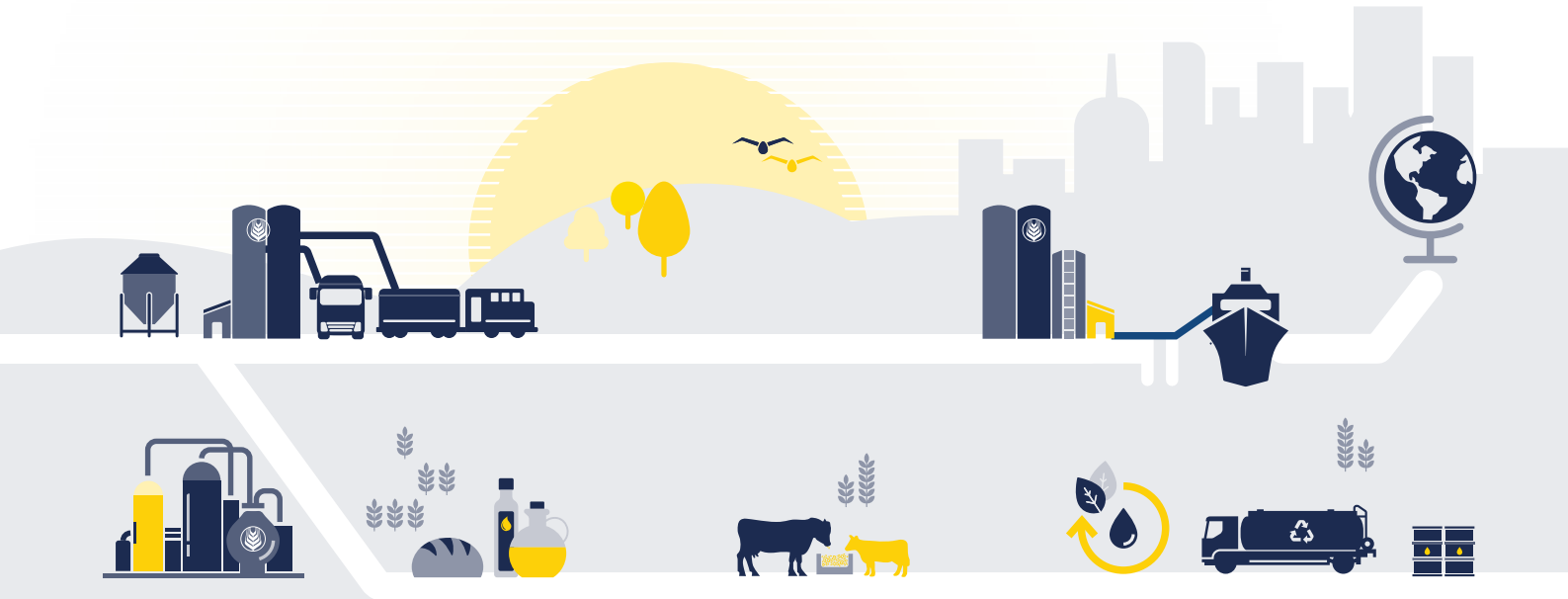


\* GrainsConnect Canada (held for sale) is a 50–50 joint venture between GrainCorp and Zen-Noh Grain Corporation.

^ Fraser Grain Terminal is a 50–50 joint venture between GrainsConnect Canada and Parrish & Heimbecker.

## Our Structure and Operations

GrainCorp partners with growers to maximise the value of their crops, connecting them to domestic and global marketplaces through our end-to-end supply chain and infrastructure assets.



### Agribusiness

#### East Coast Australia

- Largest grain storage and handling network on East Coast Australia (ECA).
- Services over ten thousand growers annually.
- Capability to handle non-grain materials such as cement, woodchips and fertiliser.

### International

- Global network of offices, originating grains and oilseeds in regions outside ECA.
- Delivering to 350+ customers in 50+ countries.
- Includes GrainsConnect Canada joint venture<sup>1</sup> and Saxon Agriculture<sup>2</sup>.

### GrainCorp Nutrition and Energy

#### Human Nutrition

- One of Australia's largest canola seed crushers producing canola oil and meal.
- One of Australia's largest importers and refiners of edible fats and oils.
- Products include blended and single oils, infant nutrition, bakery products, margarines and spreads and frying shortening.

#### Animal Nutrition

- Supplier of vegetable oil, molasses-based feed supplements and blended feed solutions to enhance farm productivity.
- Provider of feedlot performance and nutritional consulting.
- Presence in Australia and NZ.

#### Agri-Energy

- One of Australia's largest collectors of Used Cooking Oil (UCO).
- Australia's largest exporter of tallow and UCO.
- Access to a broad network of liquid tank storage across Australia and New Zealand.

➤ Further details on GrainCorp's business, operating structure and joint ventures are outlined in our 2025 Annual Report and 2025 Sustainability Report, which are available on our website: [graincorp.com.au](https://graincorp.com.au).

1. GrainsConnect Canada is a network of grain elevators located in Western Canada. See [grainsconnect.com](https://grainsconnect.com) for more information. On December 17, 2025, GrainCorp and Zen-Noh Grain Corporation, joint shareholders of GrainsConnect Canada, announced they have entered into a definitive agreement to sell 100 per cent of GCC to Parrish & Hemibecker Limited.

2. Saxon Agriculture is a UK-based seed and grain merchant specialised in the trade, import and export of cereals, oilseeds and pulses and a supplier of arable seeds and organic agriproducts in the UK. See [saxonag.co.uk](https://saxonag.co.uk) for more information.

## Our People

Our workforce brings together a breadth of experience and expertise, reflecting both the diversity of our operations and our strong connection to regional communities.

At GrainCorp, we believe our people are the foundation of our success. We take a layered approach to building a workplace where individuals can thrive, professionally, personally and with a genuine sense of belonging.

### Employees by Country

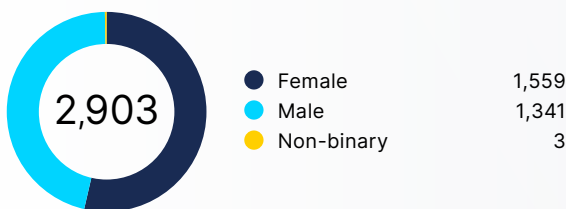
	Female	Male	Non-binary	Total
Australia	547	1,289	2	1,838
New Zealand	26	38	–	64
United Kingdom	17	16	–	33
Ukraine	8	4	–	12
Singapore	6	3	–	9
Canada	2	2	–	4
China	1	1	–	2
India	1	–	–	1
<b>Total</b>	<b>608</b>	<b>1,353</b>	<b>2</b>	<b>1,963</b>

### Senior Leadership Composition

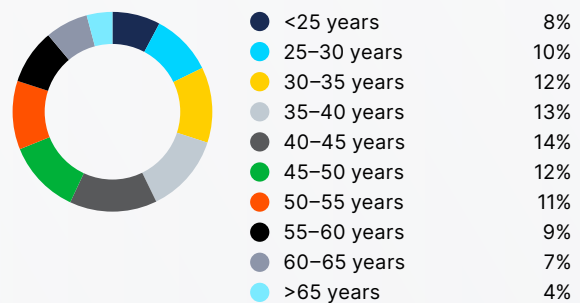
	Female	Male	Total
Non-executive Directors	2	4	6
Executive Leadership Team	2	3	5
Senior Leaders	24	52	76
<b>Total</b>	<b>28</b>	<b>59</b>	<b>87</b>

At 30 September 2025 approximately 4 per cent of GrainCorp's permanent and fixed-term employees worked on a part-time basis.

### Harvest casual workforce – Snapshot



### Employees by Age Group (%)



## Our Supply Chains

GrainCorp's supply chains include the storage, transportation and processing of grains and oilseeds. Our supply chains also facilitate the import and export of a range of commodities which are ingredients or other inputs in our value-added manufacturing operations or those of our customers.

GrainCorp procures a broad range of goods and services from several thousand suppliers across our operating regions. More than 90 per cent of all goods and services procured are from suppliers located in Australia, New Zealand and Singapore.

The main goods and services we source are:

- Commodities and raw materials including grains, tallow, oilseeds, edible oils, used cooking oil (UCO) and animal feed ingredients
- Variable labour (to supplement the permanent workforce at times of peak harvest) supplied through third-party employment agencies
- Logistics and transport services
- Fleet and mobile equipment
- Professional Services
- Packaging
- Plant equipment and maintenance services
- Personal Protective Equipment (PPE), including clothing and footwear
- Bunker consumables and site chemicals
- Office equipment including IT hardware
- Property and facilities management
- Utilities and environmental services
- Energy and fuels

GrainCorp's relationship with suppliers of goods and services in categories identified to be at high risk for modern slavery are generally supported by contracts and relationships that are long-term in nature.

## Identifying our Modern Slavery Risk

GrainCorp continues to consider modern slavery risks and the potential for the company (or its controlled entities) to cause, contribute or be directly linked to modern slavery through our operations and supply chains on an ongoing basis.

Risk is inherent in GrainCorp's daily operations and the ability to achieve our goals depends heavily on how effectively risk is managed. GrainCorp's risk management objective is to ensure all material risks are identified and measures are implemented to mitigate or otherwise manage those risks.

Over the last six years we have been progressively building processes to identify areas vulnerable to modern slavery risk in our operations and supply chains using a range of globally recognised resources as a reference point including the UN Human Rights Index<sup>1</sup>, the Walk-Free Global Slavery Index<sup>2</sup> and the Sedex Radar tool<sup>3</sup>.

These areas of potential risk, and the nature of GrainCorp's potential involvement are summarised in the table below.

This table applies to GrainCorp and all entities it owns or controls:

Category	Example	Relevance to GrainCorp	Potential involvement of GrainCorp along the UNGP Continuum <sup>4</sup>
<b>Vulnerable Populations</b>	Unskilled or temporary labour	During peak harvest periods, GrainCorp engage variable labour to supplement the needs of the permanent workforce where we do not have an ongoing or fixed need for the labour. Most of our variable labour workforce is hired directly. However, where required, we also procure variable labour through preferred supplier third-party employment agencies and other agencies as required.	Cause/Directly Linked
<b>Product and Service Categories</b>	Cost pressures or delivery timeframes may have an unintended consequence of influencing suppliers to compromise on their labour conditions	GrainCorp uses international logistics including ocean freight for the import and export of grains, oilseeds and other commodities.	Contribute/Directly Linked
<b>Geographies</b>	Operating or maintaining relationships with suppliers in countries and industry sectors with reported evidence of human rights violations	The edible oils (palm, coconut, sunflower, soybean) industry and textiles industry are two sectors relevant to GrainCorp with higher risk of human rights violations.	Directly Linked

➤ Further details on GrainCorp's risk management framework are outlined in our 2025 Corporate Governance Statement, which is available on our website: [graincorp.com.au](https://graincorp.com.au).

1. <https://uhri.ohchr.org/en>.

2. <https://www.walkfree.org/global-slavery-index/>.

3. [Sedex Radar tool](#).

4. Cause: The business' operations directly result in modern slavery practices.

Contribute to: The business' operations or actions in its supply chain may contribute to modern slavery, including through acts or omissions that facilitate or incentivise slavery.

Directly linked: The business' operations, products or services may be connected to modern slavery through the activities of another entity it has a business relationship with.

<https://modernslaveryregister.gov.au/resources/>.

## Policy and Governance

Our Human Rights Position Statement, Code of Conduct and Supplier Code of Conduct together outline our commitments and expectations of suppliers when conducting business with GrainCorp and align with our values to ensure that we observe the highest standards of fair dealing, honesty and integrity in our business activities.

### Human Rights Position Statement

GrainCorp's Human Rights Position Statement outlines our commitment to respecting internationally recognised human rights as set out in the Universal Declaration of Human Rights. We respect the fundamental principles and rights at work as outlined in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work and we are committed to complying with statutory requirements in the countries in which we operate, and to acting ethically and with integrity in all business dealings. We are progressively implementing effective systems and controls to understand, manage and minimise instances of modern slavery and human rights risks within our business and supply chain.

The GrainCorp Board, through its Sustainability Committee and Audit and Risk Committee, oversees our human rights initiatives and response to human rights.

Our policies and statements on key human rights aspects include but are not limited to:

- Human Rights Position Statement
- Code of Conduct
- Supplier Code of Conduct
- Health, Safety and Environment Policy
- Anti-Bribery and Corruption Policy
- Conflicts of Interest Policy
- Group Whistleblower Policy
- Privacy Policy
- Diversity, Equity & Inclusion Policy
- Preventing Harassment and Bullying in the Workplace Policy

Key policies and statements are supported through training, including compulsory modules covering the Code of Conduct, Preventing Harassment and Bullying in the Workplace, Anti-bribery and Corruption and Modern Slavery.

➤ These policies are available on our website at [graincorp.com.au/corporate-governance](https://graincorp.com.au/corporate-governance).

## Due Diligence and Risk Management

GrainCorp's third party due diligence procedure provides a framework for entering or renewing existing business relationships. For the onboarding of new suppliers, we take a risk based, due diligence approach, aligned with our existing Anti-bribery and Corruption procedures. Certain 'Defined Risk Criteria', including but not limited to source location and category of spend, form the basis for determining the requirement for due diligence, under three categories – Simple Due Diligence, Regular Due Diligence and Heightened Due Diligence.

We have developed additional and specific due diligence procedures for suppliers within supply chains that pose a high risk for modern slavery.

### Palm Oil

The palm oil industry, largely located in Indonesia and Malaysia, carries a heightened risk of environmental damage through deforestation and a heightened risk of modern slavery where migrant workers are vulnerable to exploitation on palm plantations and in palm processing.

The palm oil GrainCorp uses in its food processing operations is already managed under GrainCorp's Responsible Sourcing Program. GrainCorp has been a member of the Roundtable on Sustainable Palm Oil (RSPO) since 2013 and all three of our food processing sites hold RSPO certification. GrainCorp only sources palm oil from RSPO certified suppliers. In addition, our palm oil suppliers are subject to heightened due diligence and regular monitoring, including through SEDEX Member Ethical Trade Audits (SMETA).

In FY24, GrainCorp became aware of allegations of forced labour in a new palm oil supplier's supply chain through the due diligence conducted during the onboarding process. The facilities subject to the allegations did not form part of GrainCorp's supply chain and the supplier took action to identify, correct and prevent forced labour in their operations. In FY25, a SMETA was conducted at the facility used to supply GrainCorp and we continue to monitor the supplier's progress in establishing appropriate controls to meet internationally recognised labour standards via the SEDEX platform.

### Palm Oil By-products and Waste Residues

#### Palm Acid Oil

Palm acid oil (PAO) is a waste product that results from the alkaline refining of palm oil. Along with other vegetable acid oils, this waste product can be repurposed as a calorie rich component of animal feed formulations and is an ingredient for GrainCorp's Animal Nutrition business.

While the palm oil GrainCorp uses is RSPO certified (and thus managed to an industry-wide standard), achieving transparency over the supply chain for a waste product such as PAO poses challenges. For example, to efficiently collect commercial volumes of PAO, a supplier must collect the waste from multiple collection points of differing size and capability.

GrainCorp first engaged with its primary supplier of PAO over a decade ago and since this time has built a strong relationship. To meet the requirements of GrainCorp's Responsible Sourcing Program, the supplier, provides a bi-annual traceability report outlining the proportion of PAO sourced from companies with strong environmental and labour controls in place, the proportion of PAO traceable to plantation and the proportion of PAO traceable to mill. The supplier is subject to SMETA, and GrainCorp continue to monitor the supplier's progress in establishing appropriate controls to meet internationally recognised labour standards via the SEDEX platform.

### Palm Kernel Expeller

Palm kernel expeller (PKE) is a by-product of the palm oil extraction process and, similar to PAO, is an ingredient for GrainCorp's Animal Nutrition business.

In FY25 we engaged with our primary supplier of PKE who shared information on their supplier approval process, the basis of which is a robust and public NDPE (No Deforestation No Peat No Exploitation) policy and a credible and accessible grievance mechanism with a track record of holding itself and its supply chain accountable for NDPE violations.

### Other Edible Oils

In FY25, GrainCorp began expanding our high-risk supplier program to the next tier of risk and applying the commodity controls outlined above to suppliers of other edible oil commodities including coconut, sunflower and soybean oil.

### Ocean Freight

Ocean freight is a critical component of GrainCorp's supply chain, however international shipping providers are susceptible to labour rights violations due to a number of factors. These factors include ocean freight workers potentially sourced from vulnerable populations (e.g. from countries with poor track records on human rights), the involvement of multiple parties, increasing the risk of inconsistent labour standards and lack of oversight to ensure compliance with human rights obligations, and cost pressures or delivery timeframes potentially influencing suppliers to compromise on their labour conditions.

In addition to GrainCorp's third party due-diligence procedure described above, GrainCorp requires the vessels provided by suppliers:

- Maintain a Declaration of Maritime Labour Compliance certificate
- Are International Transport Workers' Federation fitted (or equivalent bargaining agreement)
- Have no labour related deficiencies recorded by the Australian Maritime Safety Authority (AMSA) or any other Port State Control Authority against vessels provided by the supplier in the last twelve months.

GrainCorp also requires that the ocean freight providers with whom we have an ongoing contract of affreightment, formally accept our Supplier Code of Conduct.

No material non-compliance events with ocean freight suppliers were identified during the reporting period.

## Due Diligence and Risk Management

### Oil commodity controls

Formal acceptance of GrainCorp's Supplier Code of Conduct<sup>1</sup>

A requirement for the supplying site or sites to have conducted a Sedex Members Ethical Trade Audit (SMETA) or similar in the previous 36 months, which provides visibility over the following human rights issues:

- Freely chosen employment
- Safe and hygienic working conditions
- Responsible recruitment and entitlement to work
- No child labour
- Freedom of association and the right to collective bargaining
- Fair wages
- Reasonable working hours
- Non-discrimination

### Ocean freight controls

Formal acceptance of GrainCorp's Supplier Code of Conduct<sup>1</sup>

Vessels provided by supplier:

- maintain a Declaration of Maritime Labour Compliance certificate
- are International Transport Workers' Federation fitted or (equivalent bargaining agreement).

No labour related deficiencies recorded by the Australian Maritime Safety Authority (AMSA) or any other Port State Control Authority against vessels provided by the supplier in the last twelve months

A requirement for the details of any non-conformances to be entered into GrainCorp's centralised grievance tracker for monitoring by the Responsible Sourcing working group

1. Or demonstration that the supplier adheres to an equivalent policy/code of conduct. Formal acceptance of GrainCorp's Supplier Code of Conduct only applies to Ocean Freight providers with an ongoing contract of affreightment for the carriage of animal fats and vegetable oils.

### Variable Labour

During peak harvest periods, GrainCorp engages variable labour to supplement the needs of the permanent workforce where we do not have an ongoing or fixed need for the labour. Most of our variable labour workforce is hired directly. However, where required, we also procure variable labour through preferred supplier third-party employment agencies and other agencies as required.

GrainCorp has confirmed that our preferred third-party agencies have implemented modern slavery policies and risk management frameworks to identify and address modern slavery risk in their workforce. No material non-compliance events were identified through our preferred supplier during the reporting period.

### Clothing and Footwear

GrainCorp purchases industrial workwear and corporate uniforms through a preferred supplier. Our preferred supplier has an established Ethical Sourcing Policy and requires their suppliers (GrainCorp's Tier-2 suppliers) to sign and agree to their Ethical Sourcing Policy. Where these Tier-2 suppliers have factories based in higher-risk jurisdictions, our preferred supplier requests ethical-trade audits to assess the risk of modern slavery in their supply chain.

No material non-compliance events were identified through our preferred supplier during the reporting period.

## Grievance Management and Remediation

In line with the United Nations Guiding Principles on Business and Human Rights<sup>1</sup> (UNGPs), we are committed to providing an effective, accessible and confidential grievance mechanism to receive and manage human rights concerns (grievances) within our operations and supply chain.

Grievances may be received through various channels, including anonymously through our independently administered FairCall hotline service (online or through the telephone hotline), our human rights email inbox, sustainability email inbox, via audit findings, suppliers own public grievance trackers, or from third-party stakeholders such as unions and Non-Government Organisations. Each of these channels have an internal owner who reviews matters as they arise and where appropriate, elevates the matter to either the Board Audit & Risk Committee (for matters within our own operations) or to the Responsible Sourcing working group (for matters relating to GrainCorp's supply chain).

The Responsible Sourcing working group includes a core team of procurement, operations, risk and sustainability representatives who meet at least quarterly and review any outstanding matters relating to supplier grievances and supplier Environment, Social and Governance (ESG) performance in general. When engaging with suppliers on grievances and supplier ESG performance, GrainCorp's priority is to find practical resolutions and/or remediate where deemed appropriate, however where a supplier refuses to engage or make progress towards improvement, GrainCorp will terminate the relationship.

This year we investigated a small number of human rights related grievances raised through our grievance mechanism channels. Types of complaints included those relating to underpayment, poor accommodation standards and recruitment. None of the grievances raised met the definition of modern slavery. Any issues, findings or opportunities for improvement arising from investigations are appropriately addressed.

GrainCorp is committed to developing its remediation approach in alignment with the UNGPs, which call for companies to consider whether they have "caused, contributed to or are directly linked" to the breach to determine their level of cooperation in remediation. In accordance with GrainCorp's policies and processes, GrainCorp determines the appropriate action to take depending on the circumstances in each case.

We are committed to providing an effective, accessible and confidential grievance mechanism to receive and manage human rights concerns (grievances) within our operations and supply chain.

1. [https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr\\_en.pdf](https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf).

## Assessing the Effectiveness of Our Actions

### Key Performance Indicators

GrainCorp has developed key performance indicators (KPIs) to measure how effective our actions have been to identify and address modern slavery practices in our operations and supply chains:

KPI <sup>1</sup>	Performance	Commentary
Modern slavery training completion rates	99.9% 94% FY24	Modern slavery training is allocated to permanent employees with responsibilities for managing our people and/or procurement responsibilities.
Percentage of GrainCorp's key operational sites covered by a SMETA completed within last three years	100% 100% FY24	Key operating sites are defined as GrainCorp's two food processing sites: West Footscray and Numurkah (Australia), covering 14% of our permanent workforce.  SMETA for all sites were renewed in FY24 with no material outcomes to report.
Percentage of suppliers in categories identified to be at high risk of modern slavery who have signed GrainCorp's Supplier Code of Conduct (or have an equivalent Code of Conduct of their own) and are covered by a SMETA completed within the last three years.	69% 67% FY24	In FY25, suppliers identified to be at high risk of modern slavery were edible oil commodity suppliers participating in industry sectors in countries with reported evidence of human rights violations.
Number of open critical non-conformances with labour standards <sup>2</sup> identified in high-risk supplier SMETAs	6	4 non-conformances were open against one palm oil supplier relating to excessive working hours and three non-conformances relating to unsafe working conditions due to fire safety system deficiencies.  2 non-conformances were open against two other edible oil suppliers relating to insufficient rest breaks between shifts and payroll deductions not in compliance with legal requirements.  GrainCorp continues to engage with the suppliers to understand their response to the non-conformances and ensure follow-up SMETAs are performed to verify the non-conformances have been remediated.
Number of modern slavery complaints reported through our grievance reporting mechanisms	0	

1. KPIs measured at 30 September 2025 with the exception of number of modern slavery complaints reported through our grievance reporting mechanisms which relates to the period 1 October 2024 to 30 September 2025.

2. SMETA assess a worksite's performance against labour standards set out in the Ethical Trading Initiative ('ETI') Base Code, an internationally recognised code of labour practice.

## Future Actions

GrainCorp is committed to further developing its modern slavery risk program as part of our broader approach to procurement and responsible sourcing. We intend to continue to expand our understanding of modern slavery risks and mitigation options in our supply chain and strengthen our human rights risk management framework.

For the coming year, our focus is on continuing to embed responsible sourcing processes across internal supply chain governance and on enhancing supplier management to align with sustainability risk mapping.

GrainCorp is committed to further developing its modern slavery risk program as part of our broader approach to procurement and responsible sourcing.

## Consultation with Controlled Entities

GrainCorp's Modern Slavery Statement has been prepared with input from an organisation-wide working group tasked with understanding our obligations, shaping our policies and procedures and developing training.

GrainCorp's Risk and Assurance team has provided updates to the Board of Directors of GrainCorp and relevant sub-committees.

GrainCorp's UK-based subsidiary, Saxon Agriculture Limited and GrainCorp's joint venture GrainsConnect Canada, have also been consulted and information has been incorporated into this Modern Slavery Statement to meet our obligations under the UK and Canadian Acts.

## Statement Approval

This Statement was approved by the Board of GrainCorp on 18 March 2026 in its own capacity and on behalf of the entities that it owns or controls that are reporting entities for the purposes of the Act.



**Robert Spurway**  
Managing Director & CEO  
GrainCorp Limited

## Appendix A – Australian, UK and Canadian Reporting Comparison

The sections of the Statement that specifically address what we have done to meet the core mandatory criteria required by the Australian Act are outlined below. The table also shows the Statement's alignment with recommended reporting criteria for statements under the UK Act and the Canadian Act.

Australian Mandatory Reporting Criteria	UK Recommended Reporting Criteria	Canada Reporting Requirements	Modern Slavery Statement Section
Clearly identify the reporting entity that is covered by the statement			<ul style="list-style-type: none"> <li>About this Joint Modern Slavery Statement</li> </ul>
Describe the structure, operations and supply chains of each reporting entity covered by the joint statement	The organisation's structure, its business and its supply chains	Its structure, activities and supply chains	<ul style="list-style-type: none"> <li>Our Structure and Operations</li> <li>Our People</li> <li>Our Supply Chains</li> </ul>
Describe the risks of modern slavery practices in the operations and supply chains of each reporting entity covered by the joint statement and any entities that each of those reporting entities owns or controls	Parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk	The parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk	<ul style="list-style-type: none"> <li>Identifying our Modern Slavery Risk</li> </ul>
Describe the actions taken by each reporting entity covered by the joint statement and any entities that each of those reporting entities owns or controls to assess and address these risks, including due diligence and remediation processes	Policies in relation to slavery and human trafficking	Policies and due diligence processes in relation to forced labour and child labour	<ul style="list-style-type: none"> <li>Policy and Governance</li> <li>Due Diligence and Risk Management</li> <li>Grievance Management and Remediation</li> </ul>
	Due diligence processes in relation to slavery and human trafficking in its business and supply chains		<ul style="list-style-type: none"> <li>Due Diligence</li> </ul>
	Training and capacity building about slavery and human trafficking available to its staff	The training provided to employees on forced labour and child labour	<ul style="list-style-type: none"> <li>Assessing the Effectiveness of Our Actions</li> </ul>
		Any measures taken to remediate any forced labour or child labour	<ul style="list-style-type: none"> <li>Grievance Management and Remediation</li> </ul>
		Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains	<ul style="list-style-type: none"> <li>Grievance Management and Remediation</li> </ul>
Describe how each reporting entity covered by the joint statement assesses the effectiveness of actions being taken to assess and address modern slavery risks	Effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate	How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains	<ul style="list-style-type: none"> <li>Assessing the Effectiveness of Our Actions</li> </ul>
Describe the process of consultation with each reporting entity covered by the joint statement and with any entities that each of those reporting entities owns or controls			<ul style="list-style-type: none"> <li>Consultation with Controlled Entities</li> </ul>
Any other relevant information			

## Appendix B – Our Structure Mapped to Our Operations

The table below maps the GrainCorp group subsidiaries covered by the Statement to Our Operations as described in the relevant section above:

Company	Country of Incorporation	Our Operations
GrainCorp Services Limited ACN 050 099 146	Australia	East Coast Australia International GrainCorp Nutrition and Energy
GrainCorp Operations Limited ACN 003 875 401	Australia	East Coast Australia International GrainCorp Nutrition and Energy
GrainCorp Commodity Management (Holdings) Pty Ltd ACN 000 013 123	Australia	GrainCorp Nutrition and Energy
GrainCorp Oilseeds Pty Ltd ACN 006 772 578	Australia	GrainCorp Nutrition and Energy
GrainCorp Commodity Management Pty Ltd ACN 107 971 095	Australia	GrainCorp Nutrition and Energy
GrainCorp Oils Holdings Pty Ltd ACN 160 256 057	Australia	GrainCorp Nutrition and Energy
GrainCorp Nutrition and Energy Australia Pty Ltd ACN 160 258 677	Australia	GrainCorp Nutrition and Energy
Performance Feeds Pty Limited ACN 061 399 675	Australia	GrainCorp Nutrition and Energy
X F Enterprises (Australia) Pty Limited ACN 111 171 530	Australia	GrainCorp Nutrition and Energy
XF Australia Pty Ltd ACN 113 288 323	Australia	GrainCorp Nutrition and Energy
GrainCorp Europe (UK) Limited CRN 07626308	United Kingdom	International
Saxon Agriculture Limited CRN 03599544	United Kingdom	International
GrainCorp Canada Inc. reg ID 8190372	Canada	International
GrainCorp Operations Canada Inc. reg ID BC1056947	Canada	International

