



2020 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 April 6, 2021. 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 first Modern Slavery Statement.

**MODERN SLAVERY ACT CRITERIA**

This Modern Slavery Statement addresses the seven mandatory criteria set out in the Modern Slavery Act. The below table identifies where the response to each criterion is located within this statement.

**MODERN SLAVERY**

Graymont welcomes the establishment of Australia’s national modern slavery reporting requirements. We see this as a crucial step in combatting the exploitation of individuals in domestic and global supply chains. We acknowledge this is only one step 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.**

Our 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 Australian Modern Slavery Act.

**The Australian 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).**

- ▶ 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 245 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, it 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.

Our products are essential in addressing today's most pressing environmental issues, while supporting vital industrial processes and agricultural needs. Uses for our products include the purification of air and water, agricultural soil improvement, sewage and wastewater treatment, and the production of items essential to a modern economy such as steel, paper, and metals.



## OUR MISSION

Improving our world by responsibly meeting society's needs for quality lime and limestone.

## WHAT WE VALUE

Our success requires both individual effort and teamwork in accordance with our shared Graymont values.

- |                              |  |
|------------------------------|--|
| <b>Integrity</b>             | We always do the right thing   |
| <b>Respect</b>               | <ul style="list-style-type: none"><li>- We respect the right of every individual to a safe workplace.</li><li>- We respect the cultures, customs and values of all people whether they be employees, customers, suppliers, regulators or community members.</li><li>- 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.</li><li>- We respect Shareholder Capital — the investment the owners have made in the business.</li></ul> |
| <b>Teamwork</b>              | Effective teams can better solve complex problems  |
| <b>Innovation</b>            | There is always a better way to do things  |
| <b>Excellence</b>            | Whatever we do, we do well   |
| <b>Long-Term Perspective</b> | We take a long-term perspective around decisions regarding   |
| <b>Accountability</b>        | 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!

## 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 our consultants, agents, suppliers, and partners. Through this shared responsibility, a 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 fight to achieve the goal of eradicating modern slavery in supply chains.

We acknowledge the eradication of modern slavery in domestic and global supply chains will not happen overnight. However, we see this global challenge as an opportunity for Graymont to show leadership and demonstrate our values in action 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:

“ At Graymont we are committed to achieving industry leadership in sustainability, community relations and social performance in accordance with our mission to improve our world by responsibly meeting society's needs for quality lime and limestone products.

As a company we welcome the opportunity to help bring awareness to the global issue of modern slavery. I would like to thank all of our employees, consultants, agents, suppliers, and partners for their vigilance in tackling this important issue. While globally there is a large amount of work still to be done, I'm confident that by working together we can put an end to modern slavery. ”



# Key Areas of Action

**At Graymont, the preparation of our first Modern Slavery Statement is one more step in our journey towards being world class in everything we do. This journey started for Graymont well before the introduction of the Modern Slavery Act.**

Examples of key areas of action taken by Graymont during this journey include:

- ▶ Internal Reviews of Compliance Practices
- ▶ Code of Business Conduct and Ethics
- ▶ Strong Corporate Governance and Accountability Framework
- ▶ Ethics Reporting System
- ▶ Respectful Workplace Training

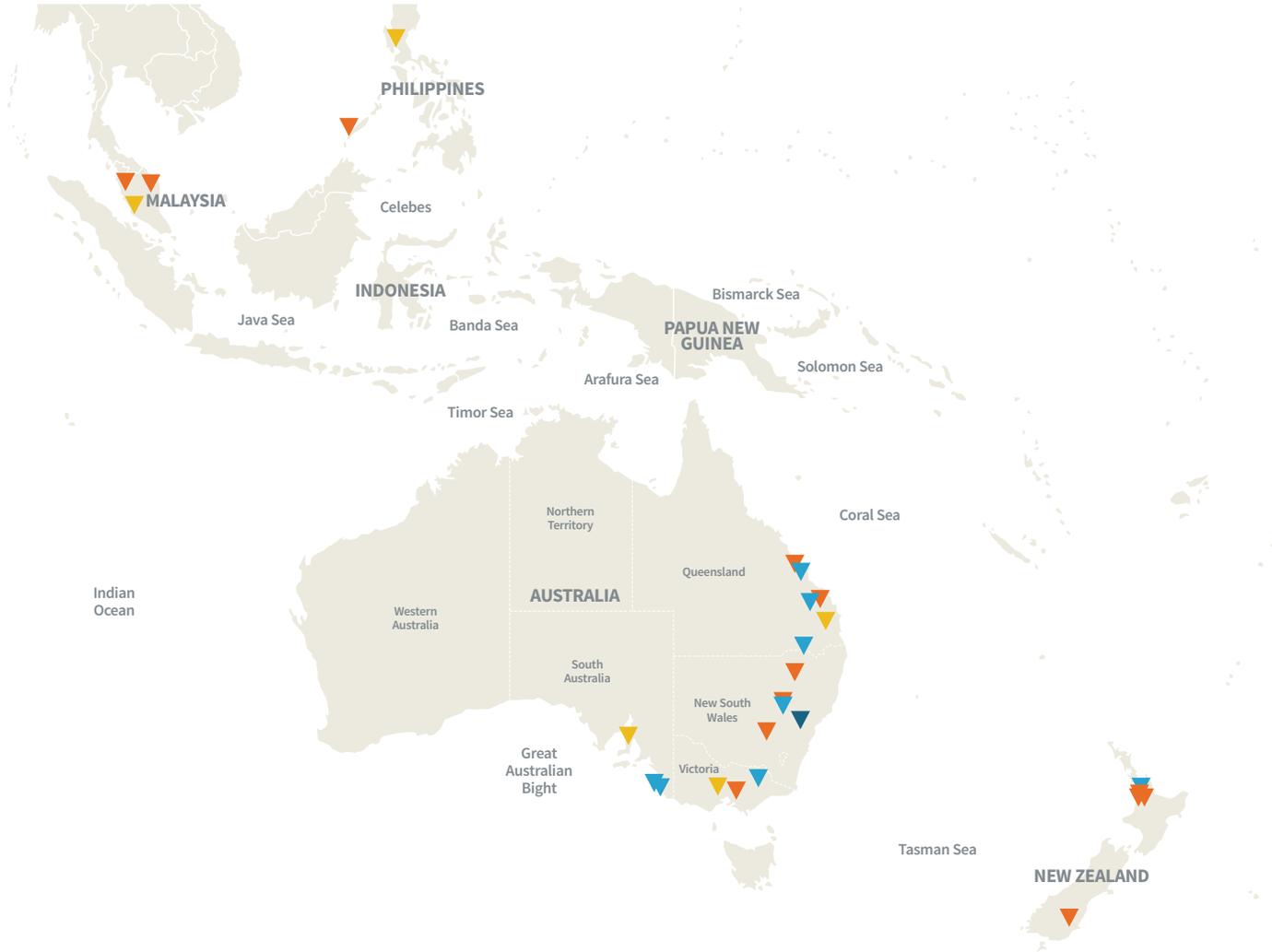
Each of these key areas of action is discussed further below in the section titled 'Actions Implemented' commencing on page 12 of this Modern Slavery Statement.

The requirement to report under the Modern Slavery Act, and our review of the guidance materials provided by the Australian Department of Home Affairs, have helped sharpen our focus even further by identifying additional ways we can partner to prevent, and help eradicate, modern slavery. These actions are discussed further below in the section titled 'Future Actions for Continuous Improvement' commencing on page 16 of this Modern Slavery Statement.

## OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Graymont's operations in Australia form part of the broader Graymont group, having joined following the acquisition of the lime and limestone business of Belgian-based Sibelco in August 2019. While relatively new to Graymont, Graymont's operations in Australia are well established, including seven lime plants and a number of limestone quarries 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 in order to support our Australian customers.

# Graymont in Asia Pacific



**LEGEND**

- ▼ Regional Offices
- ▼ Other Offices
- ▼ Lime
- ▼ Limestone operations

Graymont’s Asia Pacific operations (14 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, and 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 solution 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

- ▶ **Mining:** including soda ash, copper, zinc, nickel, gold, uranium
- ▶ **Industry:** steel, alumina, glass, pulp and paper and oil and gas production
- ▶ **Agriculture:** soil pH, soil conditions improvement, dairy and poultry feeding supplements
- ▶ **Food production and conservation:** sugar, produce, dairy, glue and gelatin, baking industry
- ▶ **Construction:** mortar, plastering, restoration, whitewash, soil stabilization and asphalt treatment
- ▶ **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

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 our modern society.

# Supply Chains

Graymont’s supply chains are extensive. Graymont has over 900 direct suppliers, 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 our manufacturing process from Asia, North America and Europe.

**Graymont’s supply chains include:**

## 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



Graymont acknowledges that the level of risk associated with modern slavery is influenced by factors such as the geographic location and industry type. As a result, we continue to investigate our supply chains in a bid 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

In 2020 Graymont conducted a desktop review of our supply chains to better understand the modern slavery risks that may exist within it. This review focused on those parties with whom we have a direct contractual relationship. We acknowledge the need to look beyond our direct supply partners, and we plan to do so in the future. However, our direct supply partners were our immediate priority as we have greater visibility and stronger influence with them to effect positive change. As part of this review we considered the following geographic, industry and global risk factors in so far as they relate to our business:

## GEOGRAPHY

Given the nature of Graymont’s operations, our supply chains span a number of different geographic locations. We recognise the heightened risk of exposure to modern slavery in some emerging economies and the potential for modern slavery to occur in developing markets. To assess these risks we have looked to the Global Slavery Index 2018, published by the Minderoo Walk Free Foundation. The Global Slavery Index measures the extent of modern slavery country by country, and the steps governments are taking to respond to this issue, to objectively measure progress towards ending modern slavery.

As part of our review of the Global Slavery Index 2018, we looked at the countries with which Graymont has a key trading relationship. The table below sets out the four key countries in the Asia Pacific region with which Graymont traded in 2020 and notes the estimated prevalence of modern slavery in each of these countries.

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

Through completing this geographic risk assessment, we have identified countries which may pose a higher risk of modern slavery. This risk assessment has assisted Graymont as we map out our actions to combat the risk of modern slavery in 2021.



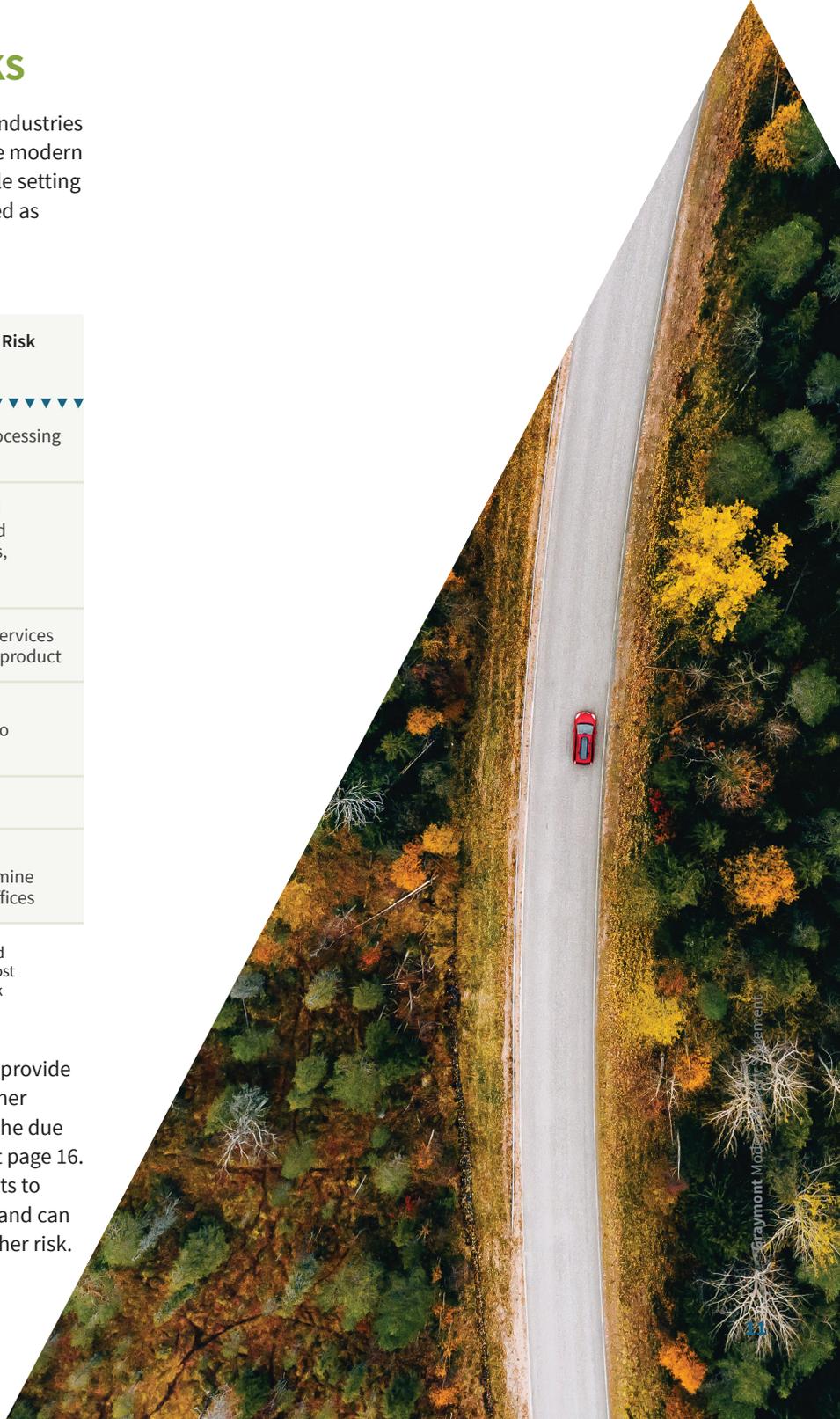
## SECTOR AND INDUSTRY RISKS

We also conducted an analysis of the sectors and industries from which we procure goods and services and the modern slavery risks in these supply chains. Below is a table setting out some of the sectors and industries we identified as posing a higher risk of modern slavery practices:

Sector / Industry	Good or Service with Risk of Modern Slavery
Extractive Industry Sector	Limestone 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.

The above list is not exhaustive and is designed to provide an overview of the areas identified as posing a higher risk. These higher-risk areas will be a key focus of the due diligence questionnaire discussed further below at page 16. Graymont will continue to conduct risk assessments to ensure we understand our evolving supply chains and can tailor our actions to address emerging areas of higher risk.



# Actions Implemented

## REVIEW OF COMPLIANCE PRACTICES

With our vision to be world class in everything we do, Graymont has always had a strong focus on compliance and we continually review our practices and processes to maintain world class standards.

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. This included a questionnaire to assess compliance against key requirements, conducting one-on-one interviews with Asia Pacific management and other key employees to understand existing processes and policies, and critically analysing the feedback received to identify improvement actions.

This review provided an opportunity for Graymont to improve our practices globally by adopting learnings from the Asia Pacific business in our North American operations and implementing improvements across the Asia Pacific business drawn from Graymont's experience globally in the lime and limestone business. A number of these improvements have already been implemented while others will be introduced throughout the 2021 calendar year.

## STRONG CORPORATE GOVERNANCE AND ACCOUNTABILITY FRAMEWORK

Graymont has a solid corporate governance and accountability framework that is critical to ensuring compliance with applicable laws and regulations. One of Graymont's core values is a long-term perspective. This is built on a solid commitment to sustainable growth, strict adherence to responsible environmental, social, workplace and operating practices, and partnering with our community stakeholders to create shared value. Fundamental to this is partnering to protect against human rights abuse. Our values and this philosophy are evident in actions taken at every level of the organisation, from the group parent company, Graymont Limited's Board of Directors and the Strategic Leadership Team to managers, supervisors and our front-line employees throughout the organisation.

### Global Board Oversight

The fundamental objective of Graymont Limited's Board of Directors is to create shareholder value. The Board recognises that, in addition to delivering sustained profitability, the company must maintain a high level of health and safety, environmental and social performance.

In accordance with this objective, and in keeping with the Board's governance responsibilities, six permanent Board committees oversee specific aspects of the business considered crucial to Graymont's long-term sustainability. The Legal and Risk Management Committee assists the Board of Directors to oversee risk management and ensure that policies, processes and procedures are in place to effectively manage significant risks to Graymont and ensure compliance with applicable laws and regulations. Management has presented to the Legal and Risk Management Committee on the risks associated with modern slavery in our domestic and global supply chains and on the actions Graymont is taking to address these.



### Local Board Oversight

In addition to global oversight by Graymont Limited's Board of Directors, the local boards of directors provides guidance to management in relation to jurisdiction specific risks of modern slavery. The local boards will continue to focus on this important issue, including reviewing the Modern Slavery Statement on an annual basis.

### Strategic Leadership Team and Local Management Team

The Strategic Leadership Team led by the President and Chief Executive Officer, as well as the local Asia Pacific management team led by the President, Asia Pacific, play a key role in Graymont's strategies to protect against the risk of modern slavery in our supply chains. The local management team has been actively involved in providing guidance and oversight to ensure modern slavery risks are understood, identified and addressed. This guidance will continue in 2021 and will be critical as Graymont pursues continuous improvement in addressing the risk of modern slavery (see page 16 of this Modern Slavery Statement for Graymont's 2021 plans).

## CODE OF BUSINESS CONDUCT AND ETHICS

Graymont's Code of Business Conduct and Ethics sets out the principles and behaviours we expect from all employees, officers and directors of Graymont in order to uphold our commitment to maintaining high ethical standards and always acting with integrity. In addition to applying to all employees, officers and directors of Graymont, we also encourage third parties working on Graymont's behalf, including consultants, agents, suppliers, and partners, to adhere to our ethical standards. We meet with our key supply partners to strengthen the relationship and monitor key compliance and performance indicators.

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.

As the ethical risks posed to our business constantly change and evolve, it is necessary for our policies to be updated to reflect these changes. Further, as we expand into new jurisdictions it is necessary for our policies to reflect any new jurisdiction specific risks. Following the successful acquisition of Sibelco's lime and limestone business in 2019, Graymont undertook a review of our Code of Business Conduct and Ethics to ensure it addressed applicable local laws and the risks associated with extending Graymont's operations into Australia, Malaysia and the Philippines. Following this review changes were made to the Code of Business Conduct and Ethics which were adopted by the respective Boards of Directors of A.C.N. 630 698 716 Pty Ltd and Graymont (Australia) Pty Ltd in 2019.

A copy of Graymont's Code of Business Conduct and Ethics is available on our website at [graymont.com/en/about-us/mission-vision-values](http://graymont.com/en/about-us/mission-vision-values).

## ETHICS REPORTING SYSTEM

We acknowledge the importance of providing avenues for individuals to report concerns identified during their day-to-day activities. As a result, we have established an Ethics Reporting System 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.

Graymont has also established an investigation framework process to ensure all reports are taken seriously and investigated. Further detail on the Ethics Reporting System is set out in Graymont's Code of Business Conduct and Ethics which is also made available in local languages as well as in Graymont's Australian and Malaysian Whistleblower Policies, copies of which are available on our website.





## RESPECTFUL WORKPLACE TRAINING

In 2020 all Graymont employees were required to complete refresher training on our Respectful Workplace Policy. This strengthened awareness of the types of behaviours that can constitute a breach of Graymont’s expectations of our employees to contribute to a safe and respectful workplace. While this training did not directly address modern slavery, by increasing awareness of the types of behaviours that may cause offense, reinforcing Graymont’s values, and reinforcing the importance of reporting inappropriate behaviours, we build the leadership, courage and commitment required at all levels of our business to identify, report and help to eliminate modern slavery risks and practices.

## GLOBAL PROCUREMENT TEAM

Following the successful integration of the Asia Pacific operations, Graymont took the opportunity to create a global procurement team. Collectively, this global team has extensive procurement experience and is well placed to identify and share best practice approaches, including in addressing modern slavery, and will help drive world class procurement practices across Graymont’s operations in Australia. The global procurement lead will play a key role in our cross-functional working group on modern slavery discussed further below in the section titled ‘Future Actions for Continued Improvement’.

# Future Actions for Continued Improvement

**As a company we strive for continued improvement in everything we do. Our approach to ensuring the eradication of modern slavery is no different. We are continuing to explore ways to better identify and act on risks within our supply chains. In 2021 we are seeking to build on our commitment to addressing the risk of modern slavery through implementing the following key actions:**

## MODERN SLAVERY WORKING GROUP

In 2021 we will establish a cross-functional working group to consider current and emerging risks of modern slavery and agree specific actions to address them, and to assess the effectiveness of actions already implemented. This working group will seek to meet quarterly and will look at opportunities for improvement across Graymont's operations in Australia.

## DUE DILIGENCE QUESTIONNAIRE

In 2021 we will implement guidelines for 'best practices' when engaging a new supplier. As part of these guidelines, we will also develop and implement a due diligence questionnaire. Suppliers will be required to complete a due diligence questionnaire prior to contract award, commencing with those in higher-risk areas of the business. This will include questions on modern slavery risks as well as other key human rights and compliance areas including health and safety and compliance with applicable laws. Where a potential risk or unacceptable practice is identified, additional discussions will be held between Graymont and the supplier to ensure practices are improved or rectified and any risks appropriately mitigated.

The due diligence questionnaire is not designed to eliminate suppliers with modern slavery risks or practices. Instead, Graymont will seek to work with suppliers to ensure inappropriate practices stop and risks are understood by both parties and appropriately mitigated. Graymont acknowledges that simply excluding a supplier without first working with them can lead to unintended consequences, potentially impacting a supplier's employees, and ultimately potentially increasing the risk of modern slavery. In this way, the due diligence questionnaire is intended to be a collaborative approach designed to enhance Graymont's understanding of our supply chains and ensure solid human rights practices within it.

In putting together the due diligence questionnaire Graymont will seek input from various functions within our business, including human resources, procurement, health and safety, site operations and legal as well as from our external business partners and suppliers. While assisting to identify current practices and risks within our supply chains, even more importantly we see the questionnaire as an opportunity to grow the dialogue around modern slavery, increasing awareness and providing an opportunity for Graymont and our suppliers to learn from each other.

The introduction of the due diligence questionnaire will provide a springboard for Graymont to take further positive steps to address the risk of modern slavery in the future. This will include working with suppliers to see how they are progressing with any actions that they have agreed to put in place to address the risk of modern slavery.



## TRAINING AND COMPLIANCE

Through our structured review of compliance practices (discussed further above), we identified a need for ongoing training outlining specific standards and legal requirements applicable to Graymont's business and the jurisdictions in which we operate. In 2021 we will develop and present modern slavery training for our procurement teams, logistics teams, senior site personnel and senior managers across the business. This training will focus on educating staff around key modern slavery risks within our business and supply chains, ensuring we do not inadvertently increase the risk of human exploitation by placing unreasonable demands on our suppliers, and raising awareness of the tools available to identify and report modern slavery concerns.

This training and compliance will be an important step in increasing knowledge and awareness within the business, enhancing our people's vigilance on modern slavery risks and practices, and establishing a platform from which further targeted training can be completed in future years.

## ENHANCED CONTRACTUAL PROTECTIONS

As Graymont enhances our understanding of our direct and indirect supply chains, we will identify areas to build in greater contractual rights and protections. The first step in this process is to ensure all relevant contracts include a general requirement for the counterparty to comply with all applicable laws and Graymont policies. In addition to this, we will ensure all relevant agreements contain a right for Graymont to audit the counterparty's compliance with applicable laws and policies and a right for Graymont to terminate the contract, at our discretion, if any breaches are identified. This right to audit will enable Graymont to better assess compliance and in turn identify suppliers of greater risk.

In addition to building in audit rights within our contracts, we will also introduce into relevant contracts an obligation for Graymont to consent to any sub-contractor being engaged and a requirement for the sub-contractor to agree, at a minimum, to comply with the obligations under the contract between Graymont and our direct counterparty. This will assist to provide Graymont with additional comfort that we are also identifying and addressing risks in our indirect supply chains. While we acknowledge a contractual provision alone does not guarantee compliance, we see this as an important first step in building awareness amongst our direct business partners of human rights risks and our expectations that they identify and address them.



# 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 in achieving our end goals.**

In 2020 Graymont focused on implementing steps to address modern slavery risks in our direct supply chains. Through the actions taken, Graymont now has a much clearer understanding of our direct supply chains and the risks within them. This has assisted to drive positive change through increased awareness and more meaningful engagements with our suppliers.

That said, it is acknowledged this is the first year Graymont has prepared a Modern Slavery Statement and there are opportunities for further improvement. In addition to our 'Future Actions for Continued Improvement' outlined on page 16 of this Modern Slavery Statement, going forward Graymont will also seek to better understand our indirect supply chains.

In order to ensure these positive steps are completed and Graymont is able to see continued improvement, management will continue to update the Legal and Risk Management Committee on its efforts in these areas and will also discuss the Modern Slavery Statement annually with the A.C.N. 630 698 716 Pty Ltd Board of Directors.



# 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 more 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 2021 include:**

- ▶ Establish a cross-functional modern slavery working group
- ▶ Develop Due Diligence Questionnaire and implement with higher-risk suppliers
- ▶ Develop and implement modern slavery training
- ▶ Enhance contractual obligations with suppliers
- ▶ Continue targeted reviews of compliance practices

Through shared responsibility and a commitment to continuous improvement and action, we are confident we can 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 and Graymont (Australia) 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. As we strive for continuous improvement in crucial areas such as environmental stewardship, workplace health and safety and stakeholder relations, 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)