



**MODERN SLAVERY POLICY**

**UNITED MALT GROUP LIMITED**  
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**UNITEDMALT.COM**

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## **1 INTRODUCTION**

United Malt Group Limited (**United Malt**) has respect for human rights as one of its core values; this means that United Malt will conduct its business in a way that recognises and respects the rights of its employees, customers, suppliers and contractors to be free from practices of modern slavery. These actions are not only the moral and ethical thing to do, but central to the ongoing growth and success of our business.

United Malt is committed to making a positive contribution to society by implementing responsible sourcing principles and assessment across our supply chain. We expect all Company Personnel to conduct all activities with integrity and according to the letter, spirit and intent of this Policy and all applicable laws.

The purpose of this Policy is to ensure that the United Malt group of companies:

- is compliant with local, national and other applicable laws and regulations in the areas in which the businesses operate;
- sources products and services in accordance with legal obligations and community expectations while working with suppliers to improve their social and environmental practices; and
- act to prevent, mitigate and where appropriate, remedy modern slavery in their operations and supply chains.

## **2 APPLICATION**

This Policy applies to:

- Company Personnel;
- Agents and Representatives; and
- Any person directly involved in United Malt's joint venture operations, where United Malt exercises control in relation to the joint venture's policies and procedures.

This Policy should be read in conjunction with:

- United Malt's Code of Conduct;
- United Malt's Whistleblower Policy and Procedure;
- United Malt's Anti-Bribery and Corruption Policy;
- United Malt's Third Party Due Diligence Procedure; and
- any local laws or regulations relating to modern slavery.

Copies of these reference materials can be accessed via United Malt's intranet site or made available upon request to the Chief Financial Officer.

## **3 TYPES OF MODERN SLAVERY**

'Modern slavery' describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.

Modern slavery includes 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.

United Malt is committed to identifying and mitigating risks of modern slavery practices in its supply chain. 'Risks of modern slavery practices' means the potential for United Malt to cause, contribute to, or be directly linked to modern slavery through its operations and supply chains. This includes:

- the risks that United Malt's operations may directly result in modern slavery practices;
- the risks that United Malt's operations and/or actions in its supply chains may contribute to modern slavery, including acts or omissions that may facilitate or incentivise modern slavery; and
- the risks that United Malt's products may be connected to modern slavery through the activities of another entity United Malt has a business relationship with (including entities United Malt does not have a direct contractual relationship with).

#### **4 UNITED MALT'S MODERN SLAVERY RISK PROGRAM**

United Malt's Modern Slavery Risk Program is administered by [the Safety, Health, Environment and Governance Committee] and provides a framework that:

- raises awareness of modern slavery risks;
- delivers training to persons involved in procurement about modern slavery risks, including the key indicators of modern slavery;
- maintains systems and procedures for conducting due diligence on Third Parties;
- encourages reporting of identified or potential modern slavery risks; and
- investigates any reported suspicions of modern slavery involving United Malt.

Compliance acts as an independent compliance function to prevent and minimise the risk of modern slavery in United Malt's supply chains throughout the world.

#### **5 RESPONSIBILITIES**

Company Personnel are required to:

- understand and comply with this Policy and United Malt's Code of Conduct in all United Malt dealings throughout the world;
- attend and participate in training sessions relating to the Modern Slavery Risk Program;
- follow certain due diligence and risk assessment processes in respect of suppliers; and
- immediately report any suspicious activities in good faith.

In addition, Company Personnel who exercise managerial supervision over Company Personnel and/or Third Parties must also:

- ensure all persons under his or her supervision understand their obligations under this Policy;
- never request or suggest that Company Personnel and/or Third Parties pursue or achieve business results at the expense of breaching this Policy;
- create an environment that enables and encourages others to raise concerns; and
- respond appropriately to questions and concerns related to this Policy (including referring Company Personnel and/or Third Parties to Compliance, if appropriate).

#### **6 THIRD PARTY DUE DILIGENCE**

Before engaging any Third Party, you must follow the supplier risk assessment processes and, if required by the supplier risk assessment process, escalate for approval by the person designated under the supplier risk assessment process. Approval will be required where, among other circumstances, the supplier risk assessment process indicates there is a medium to high risk of modern slavery being present in the supplier's operations or its supply chain.

## **7 CONTRACT GOVERNANCE**

All commercial arrangements must be clearly documented in writing and duly executed by United Malt and the relevant Third Party.

All new contracts, including any renewals or amendments of existing contracts, involving suppliers must include provisions indicating that all parties will comply with all applicable laws relating to employment and safety standards, human rights, human trafficking and modern slavery.

## **8 GOOD FAITH REPORTING**

United Malt encourages raising concerns in good faith and expects you to report all activity which does or may breach this Policy. If you identify any modern slavery risks or factors indicating such risks may be present in United Malt's supply chain, you are encouraged to report this regardless of any direction you have received from a supplier or Company Personnel.

To report suspicious activity, please contact the [Group Risk and Insurance Manager] or Company Secretary, or alternatively refer to United Malt's Whistleblower Protection Policy, available on United Malt's website at [www.unitedmalt.com](http://www.unitedmalt.com).

There will be no retribution of any kind for reports made in good faith.

## **9 POLICY REVIEW AND AMENDMENT**

This policy must be reviewed by the Board or its delegated committee with the assistance of Compliance at least annually to ensure it is operating effectively. Any recommended changes must be approved by the Board or its delegated committee.

## **10 DEFINITIONS**

**Agents and Representatives** means any individual or entity, including any personnel working for such individual or entity, engaged to act on behalf of United Malt (with the authority to bring United Malt into contractual relationships with other parties) and/or represent United Malt (having the authority to describe itself as United Malt's representative in dealings with other parties).

**Company Personnel** means all individuals who are employed or engaged by United Malt including any officers, directors, associates, employees and contract-basis personnel, wherever located.

**United Malt** means United Malt Group Limited, including its subsidiaries and affiliates.

**Third Party** means any individual or entity not employed or engaged by United Malt (i.e. not Company Personnel), and includes any joint venture partner, Agent and Representative, advisor, affiliate, contractor, consultant, intermediary, actual or potential customer, broker, dealer, distributor, supplier, service provider, vendor, shipping company or agent, customs agent, exporter, shipper, consignee, receiver, Public Official or State Owned Entity.



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