

Modern Slavery Statement

FY21



This statement has been prepared in accordance with the following Acts, collectively referred to as the 'the Acts', for the reporting period ended 30 September 2021:

- Modern Slavery Act 2018 (Cth)
- Modern Slavery Act 2015
- California Transparency in Supply Chains Act

This is a joint statement which has been prepared on behalf of United Malt Limited (ABN 61 140 174 189) and its subsidiaries which are also reporting entities under their respective Acts, which include:

Reporting entities under the Australian Act

- United Malt Group Limited (ABN 61 140 174 189)
- Australia Malt Holdco Pty Ltd (ABN 18 121 418 899)
- Australia Malt Finco Pty Ltd (ABN 35 121 418 906)
- Barrett Burston Malting Co Pty Ltd (ABN 39 050 142 526)

Reporting entities under the UK Act

- Bairds Malt Limited (CRN 03580592)

Reporting entities under the California Act

United States based entities

- Great Western Malting Co. (Delaware File Number 2184031)

Entities registered in Canada

- Canada Malting Co. Ltd (Canada Corporation Number 454021-2)

The registered office details of United Malt Group Limited are as follows:

**Citigroup Centre,
Level 18, Suite C
2 Park Street,
Sydney NSW, Australia 2000**

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Introduction

Welcome to United Malt Group Limited's (United Malt) second Modern Slavery Statement (the Statement). In alignment with our group-wide Modern Slavery Risk Program, we made the decision this year to consolidate our public modern slavery disclosure and have prepared a joint statement on behalf of our subsidiaries, and in accordance with the respective modern slavery reporting legislation across each of our jurisdictions.

This Statement outlines the steps we have taken during the reporting period to identify, address, mitigate and remediate the risks and impacts of modern slavery in our operations and supply chains. I am pleased to share the actions we have taken throughout the year to continue to develop our response to this serious issue.

FY21 Overview

- We introduced our Modern Slavery Policy to formalise our commitment and governance
- We established our group-wide Modern Slavery Working Group to lead our modern slavery response
- We achieved a 99% completion rate of modern slavery training for relevant personnel across the group (with 100% achieved shortly thereafter)
- We introduced our revised group-wide supplier screening process to support the identification of modern slavery risks and to inform appropriate due diligence activities
- We commenced targeted due diligence activities over suppliers identified to be within our higher risk categories through the distribution of questionnaires
- We engaged an external advisor to assess the current state of our Modern Slavery Risk Program and to support the development of a roadmap to continue to enhance our program

We recognise that modern slavery remains a serious issue globally and acknowledge the risk that modern slavery practices may exist within our global value chain. Our leadership remains of the unanimous view that we have an ethical and moral responsibility to take appropriate action towards mitigating the risks of modern slavery within our value chain and engage in appropriate remediation where modern slavery instances are identified.

Recognising that modern slavery is only one example of a violation of human rights, United Malt plans to expand our program to capture broader human rights issues over the coming years. As part of this, we plan to identify our salient human rights issues, understand our wider human rights impacts, and cement our position and strategy for future action. We look forward to updating you on our progress next year.

This Statement was approved by the Board of Directors of United Malt Group Limited on the 15 March 2022.



Mark Palmquist
Managing Director and CEO

Overview

Governance

FY21 Actions

- Introduced our Modern Slavery Policy
- Established our group-wide Modern Slavery Working Group to lead our modern slavery response

FY22 commitments

- Expand the Modern Slavery Working Group to ensure appropriate geographic and cross-functional representation
- Develop a Modern Slavery Working Group charter to define accountabilities
- Formalise a group-wide modern slavery risk tolerance

Training

FY21 Actions

- Achieved a 99% completion rate of modern slavery training for relevant personnel across the group

FY22 commitments

- Introduce second phase of training for key personnel to further support our approach to identifying and addressing potential risks during the supplier vetting stage
- Deliver group wide introductory modern slavery training

Due diligence activities

FY21 Actions

- Introduced our revised group-wide supplier screening process to support the identification of modern slavery risks and to inform appropriate due diligence activities
- Commenced targeted due diligence activities on suppliers identified to be within our higher risk categories through the distribution of questionnaires

FY22 commitments

- Commence supply chain mapping and perform inherent risk assessment over Tier 1 existing supplier base
- Develop detailed supplier engagement materials to support procurement personnel
- Commence mapping and assessing the risks of human rights violations within our shipping and logistics supply chains, and explore collaboration opportunities to address systemic issues
- Continue due diligence activities over existing suppliers
- Identify our salient human rights issues and establish a strategy to integrate broader human rights issues into our Modern Slavery Risk Program

Remediation

FY21 Actions

- No instances of modern slavery were identified within our operations or supply chains within the year, and therefore no remediation activities were performed

FY22 commitments

- Develop a remediation policy and establish a modern slavery response protocol

Assessing effectiveness

FY21 Actions

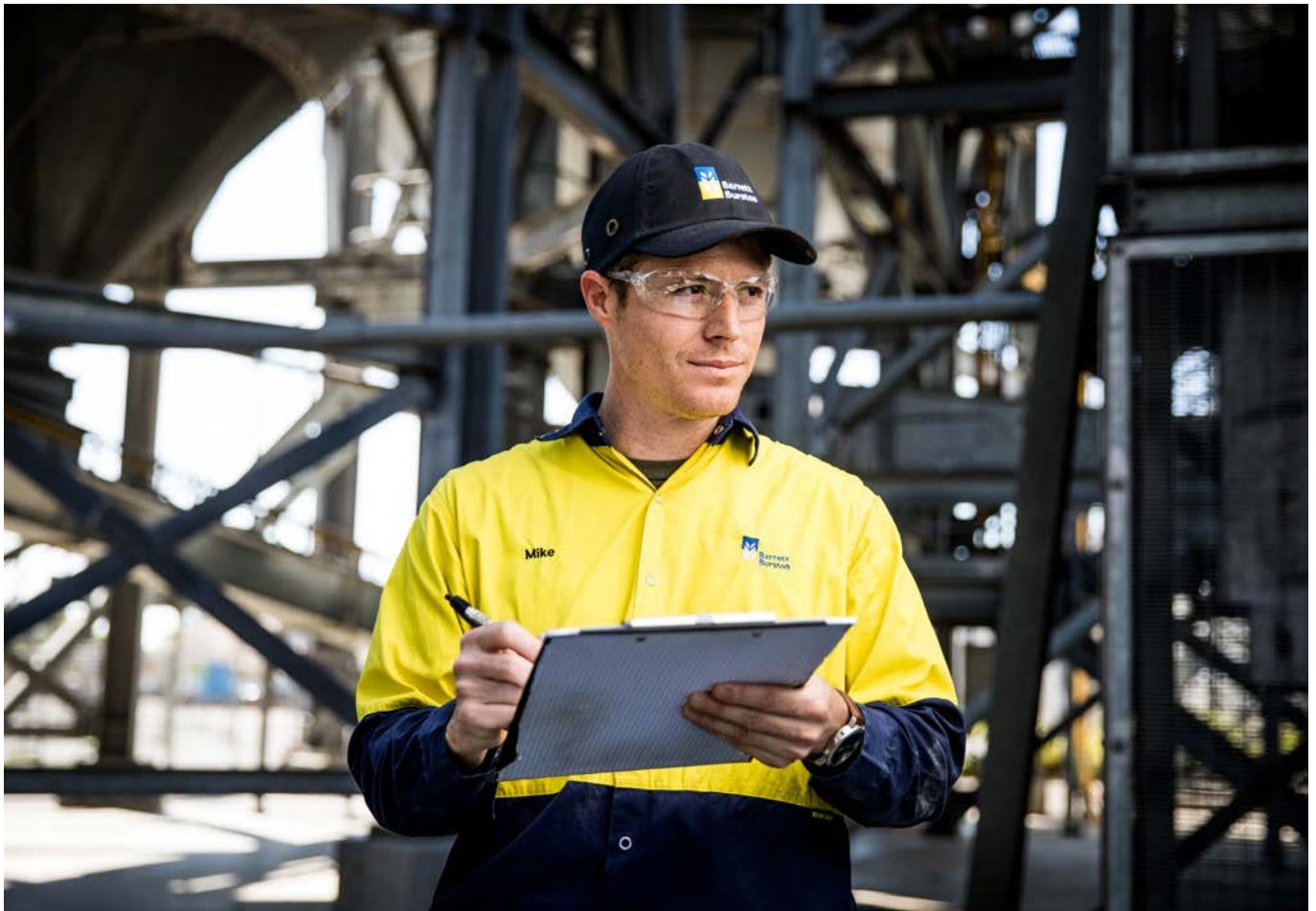
- Engaged an external advisor to assess the current state of our Modern Slavery Risk Program and to support the development of a roadmap to continue to enhance our program

FY22 commitments

- Establish a schedule to conduct periodic reviews to assess the effectiveness of our program
- Review existing whistleblowing process
- Establish an internal monitoring and reporting framework

Consultation

While the day-to-day management of our operations across the different jurisdictions and entities is typically decentralised, United Malt is governed by our group-wide policies and procedures, and internal reporting lines, which are monitored at a group level. Our Modern Slavery Risk Program is governed and managed at a group level and has been implemented across our business activities globally. Representatives from all of the entities we own, or control (entities outlined in Appendix A) were engaged and consulted regularly throughout the reporting period to drive the effective implementation of our due diligence procedures, and to support the development of this Statement. Further, we engaged an external advisor within the reporting period to assess the effectiveness of our Modern Slavery Risk Program and support the development of a roadmap to continue to enhance our approach. Throughout this process, representatives across our global operations were consulted to confirm our understanding of the consistency in which the implementation of our existing modern slavery management practices were taking place.



Structure, operations & supply chains

United Malt is the fourth-largest commercial maltster globally, operating as a consolidated network of companies that span Australia, New Zealand, North America, and the United Kingdom. United Malt (ASX: UMG) has 100% ownership of subsidiaries which are registered and operate in each of our regions.

United Malt has a production capacity of 1.25Mtpa across 12 processing plants in Australia, Canada, the United States, and the United Kingdom. We also operate an international warehouse and distribution business, with 25 warehouses, both company-operated and through third party logistics providers, and have international craft distribution partnerships throughout North America, South America, Europe, Asia and Australia. Our global presence enables us to be a leading malt supplier for breweries, distillers, and food companies from all over the world.

At the end of the reporting period, United Malt employed approximately 900 staff globally, with 883 permanent employees, 3 fixed term casual and 8 temporary workers. We recognise there are increased modern slavery risks associated with the employment of casual or temporary workers, however all of our casual and temporary workers are employed on contracts equitable with permanent employees, with remuneration packages commensurate with the market. The majority of our staff are located in the United States (343) and Canada (239), with smaller contingents in the United Kingdom (180), Australia (128), and New Zealand (4). These are countries with relatively strong regulatory environments in relation to employment protections and workplace conditions.

North America

United States (343 employees) and Canada (239 employees)

Global HQ: Vancouver, WA

Great Western Malting and Canada Malt: Approximately 750kt malting capacity in five locations in the US and Canada, with nine country elevators in Canada

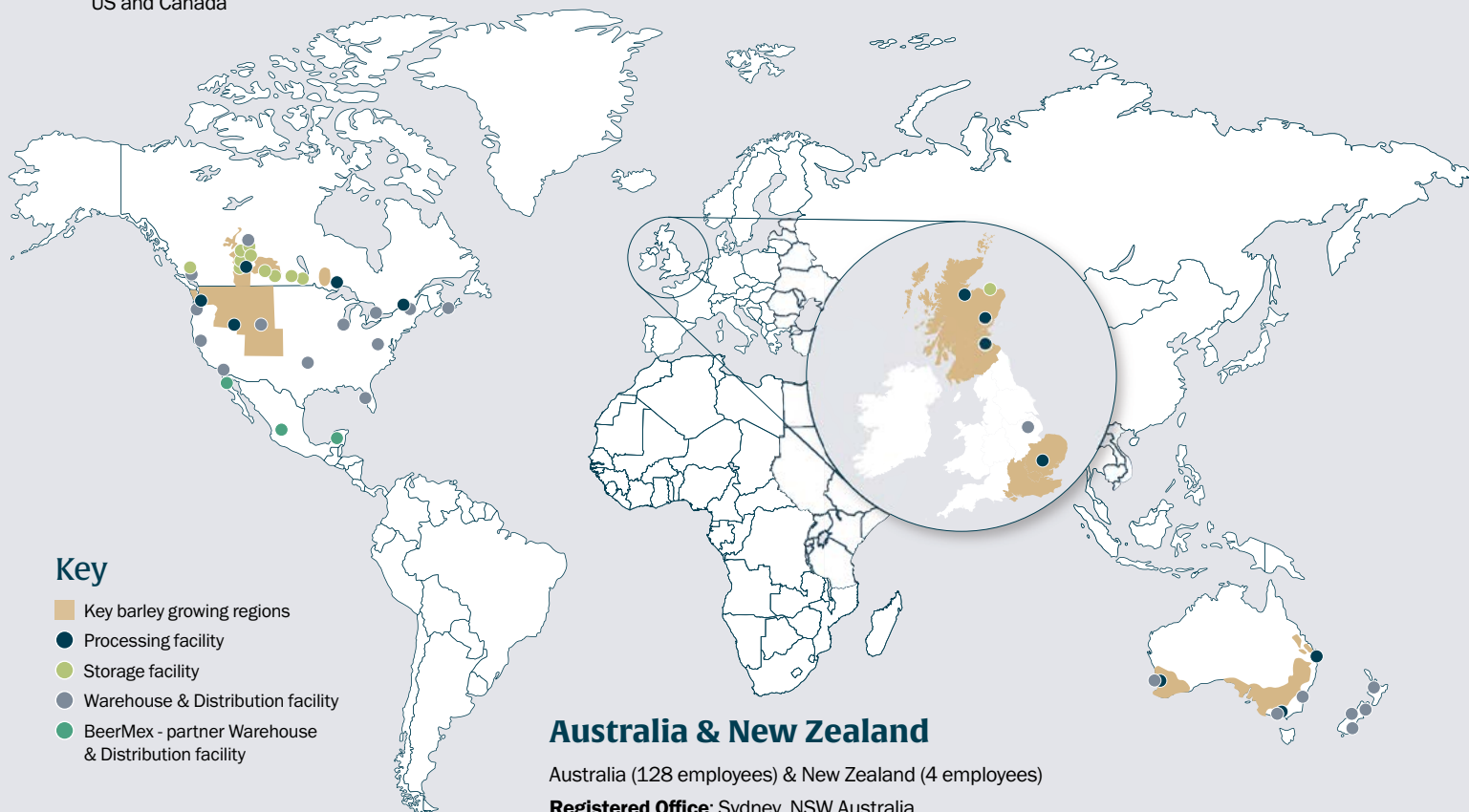
Country Malt Group: Twelve Distribution Centres across the US and Canada

United Kingdom

(180 employees)

Bairds Malt: Approximately 225kt malting capacity, with three plants in Scotland and one in England

Brewers Select: One distribution Centre in Peterborough, UK



Key

- Key barley growing regions
- Processing facility
- Storage facility
- Warehouse & Distribution facility
- BeerMex - partner Warehouse & Distribution facility

Australia & New Zealand

Australia (128 employees) & New Zealand (4 employees)

Registered Office: Sydney, NSW Australia

Barrett Burston Malting: Approximately 250kt malting capacity across three locations in Australia

Cryer Malt: Eight Distribution Centres across Australia and New Zealand

Structure, operations & supply chains cont.

Long term relationships with our network of local barley growers and aligned suppliers enable United Malt to serve our growing customer base of brewers, distillers, and other users of malt and craft ingredients all around the world. As outlined in our prior statement, our core areas of supply are as follows:

- 1. Grains** – supplied to the Processing division which are ultimately converted into malt for sale to customers. We prioritise the procurement of our barley from growers, farmer co-operatives or grain merchants in local regions that support our processing facilities.
- 2. Other products for resale to customers** – in addition to grains, United Malt sources malt and malt-adjacent products and agrichemicals. These are resold by our Warehouse and Distribution division directly to customers.
- 3. Warehousing & Transport logistics** – Where United Malt does not own warehouses in certain locations, barley storage is outsourced to third party warehousing providers. Freight carriers are engaged to transport our products to domestic and international customers.

- 4. Goods not for resale** – To support our business activities, we procure a range of goods and services which are not intended for resale to customers. This predominantly includes equipment used in our facilities, packaging materials, merchandise, office stationery, and services such as cleaning, IT services and professional services. Typically, we engage suppliers locally; however, we recognise that the goods are often produced in other countries and therefore require additional enquiry to understand the origins of the goods.

In FY22, we will commence supply chain mapping and perform an inherent risk assessment over our Tier 1 existing supplier base. This will include, at a minimum, considering not only where the goods are sourced from, but also where the goods are produced.



Selection of the highest quality barley

We maintain long term relationships with a diverse range of growers, over multiple growing regions.

We contract directly with growers for production acres and planting of specific varieties to meet the needs of our customers. We also contract with Merchants for supplies of grain, who have the direct relationship with the farmers.



Quality & providence preservation

We have capabilities to store our barley in the right conditions to maintain quality prior to processing.

We segregate our barley to preserve its unique identity and key quality attributes to meet our customers' requirements.



Processing Conversion to Malt

Our processing plants are in close proximity to barley crops, reducing transportation and handling requirements. In our 12 processing plants we convert the barley into malt via a process of steeping, germination and kilning. Through these processes we create our range of base and speciality malts for applications in the brewing, distilling and food markets.



Distribution

Distribution is a further step in our value creation, as we connect our customers to our malts in the format that meets their requirements.

Our Processing division distributes our malt products in a bulk format via rail car, road and containers to major food and beverage producers.

Our Warehouse and Distribution division provides our malts in a smaller format to meet the needs of craft producers. We complement our malt ingredient offering with the provision of the full range of other brewing and distilling ingredients. We provide our customers with products including hops, yeast, adjuncts, flavours and packaging materials – providing the one stop shop for craft producers.

Modern Slavery Risks

Modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedoms. Modern slavery manifests within modern day supply chains in practices such as forced labour, debt bondage, child labour and other slavery-like practices such as human trafficking.

While modern slavery risks can be present in any context, we consider the modern slavery risk level within our operations to be low. As mentioned above, we predominantly hire permanent employees, with a small number of casual or temporary workers. While the employment of manual workers across some of our operating activities, such as our warehouse and distribution, presents an inherently higher risk of modern slavery, we are confident that the strong regulatory environments in which we operate, coupled with our robust policy environment including remuneration, strict compliance culture, and our zero tolerance for modern slavery related practices within our operations, mitigates the risk of modern slavery occurring within our operations.

For this reason, our focus on managing modern slavery risks at United Malt is on our supply chains where our relationship to the risk is less direct. During the year, we focused efforts on further understanding the risks associated with the risk areas identified last year, namely:

- Raw agricultural materials
- Packaging
- Labour Hire Agencies

Additionally, freight providers have been identified as an emerging area of modern slavery risk and so we will further develop our due diligence activities in this area in FY22.

Barley and other raw agricultural materials

The most frequently procured raw material in our business is barley. We recognise that, in certain jurisdictions, agricultural industry presents a higher inherent risk of modern slavery, such as forced labour, bonded labour and human trafficking where there is typically a manual workforce, higher levels of seasonal workers, and an increased vulnerability for exploitation due to the work often being in remote locations.

The production of barley however is harvested by our suppliers through a largely mechanised process which is not labour intensive, and therefore does not involve high levels of seasonal workers. Many of the barley farms we engage are operated by a small group of workers, including family-run farms. Furthermore, we predominantly procure our barley and other raw agricultural materials in close proximity to our operating activities, which are all jurisdictions with comparatively strong regulatory environments for employee protections. That said, we recognise that harvest methods vary by geography and product type, and there may be some risk of modern slavery, or labour-related issues occurring. Where we procure through co-operatives or grain merchants, we are provided with information of the source of the grains through to the farms.

While we consider the modern slavery risk level within our barley suppliers to be low, we do have a stronger causal relationship to the

risks, and therefore we have a responsibility to continue to monitor this core area of our supply chain. Our raw material suppliers will remain a focus area within our Modern Slavery Risk Program.

Packaging

We procure a large volume of packaging, used to store and distribute our malting products. We recognise there is a higher inherent risk of modern slavery practices, such as forced labour, bonded labour and child labour, associated with the bulk manufacturing of packaging products. This is due to the low-cost model of the industry, manual workforce, and often the presence of opaque intermediaries, which reduces the visibility of where the products are produced and the extent to which labour practices are upheld by producers. While we typically engage suppliers who are based locally in the countries in which we operate, we understand that our packaging is produced by contract manufacturers of these suppliers in higher risk countries for modern slavery practices, such as India, Indonesia, China and Vietnam.

In FY22, we will continue to conduct further supply chain mapping and due diligence activities over our packaging suppliers to validate our understanding of inherent risk and to address any identified issues.

Freight providers

United Malt engages freight providers to transport our products to customers domestically and internationally. Although most of these providers operate out of North America, the United Kingdom and Australia, we recognise that in certain areas the global shipping and logistics industry continues to face systemic issues relating to human rights violations, including modern slavery, such as forced and bonded labour. This is due to a number of factors which significantly heighten the workers' vulnerability to exploitation, such as the limited visibility over the treatment of workers, limited access to domestic employment protections, and working remotely without means to contact home for long periods of time.

The shipping industry has faced unprecedented levels of disruption during the pandemic, with estimates of approximately 100,000 seafarers being stranded at sea beyond their usual rosters. In an already high risk industry for labour rights violations, the pandemic has pushed the shipping industry into an area of global human rights focus. The shipping industry is critical to United Malt's business, and we therefore recognise that we hold a responsibility to do what we can to improve the lives of people within our value chain.

In FY22, we will commence mapping and assessing the risks of human rights violations within our shipping and logistics supply chain. As part of this, we will explore opportunities with other industry partners and civil society organisations to support collective actions to address systemic issues within the shipping industry.

In FY22, we will also commence a broader supply chain mapping and risk assessment exercise over our existing supplier base and will analyse the causal relationship we have to the risks identified, which is anticipated to further refine United Malt's response.

Modern Slavery Risk Program

Governance

At United Malt, respect for human rights remains one of our core business values, and we are committed to upholding our responsibility to do our part to avoid harm and to improve the working lives of people within our global value chains.

FY21 Overview

- We established our formal position and commitment to addressing modern slavery through the introduction of our Modern Slavery Policy
- We established our Modern Slavery Working Group to lead the strategy and execution of our Modern Slavery Risk Program

Introduced our Modern Slavery Policy

We introduced our Modern Slavery Policy during the year which established our overarching position and commitment to conduct business in a way that recognises and respects the rights of our employees, customers, suppliers, and contractors to be free from practices of modern slavery.

The Policy applies to all company personnel, including agents and representatives, regardless of where they are employed or contracted across the United Malt Group, including any subsidiaries and affiliates. It also sets out our commitment to take the necessary steps to address modern slavery risks within our operations and supply chain and communicates this commitment externally to those with whom we interact.

Established our Modern Slavery Working Group

Our Managing Director and Chief Executive Officer holds ultimate accountability for our modern slavery response.

To operationalise the Policy, and lead our modern slavery response, we established our Modern Slavery Working Group during the year. The Working Group is comprised of leadership representatives across our global operations, including, our Group Chief Financial Officer, Chief Operating Officer, Chief People Officer, Corporate Counsel & Company Secretary, UK Chief Financial Officer, Director of Risk and Insurance and key functional leads from across the business, all of whom have been tasked with the role to lead the overarching strategy, design and implementation of our Modern Slavery Risk Program across our global operations. The working group convenes monthly, at a minimum, to drive progress on agreed undertakings, facilitate internal monitoring and reporting, including reporting of progress to the Executive Leadership Team (ELT) and Board, establish our longer-term strategy, and to deliberate and resolve any identified modern slavery related matters of contention.

We acknowledge the importance of defining and maintaining clear accountabilities for relevant personnel across our businesses to drive the successful implementation of our Modern Slavery Risk Program. During an annual review of our program, we identified this to be an improvement area within our program, and we plan to take the necessary efforts in FY22 to enhance our governance.

In FY22, we will formalise the governance structure of our Modern Slavery Risk Program through the expansion of our Modern Slavery Working Group to include appropriate geographic and cross-functional representation, and the development of a Modern Slavery Working Group charter to clearly define roles and responsibilities, maintain accountabilities, and to establish a clear action plan to drive continuous improvements in our program. As part of this, we will also work to formalise a group-wide risk tolerance for modern slavery, and human rights more broadly, to support the development of risk-based due diligence procedures.

Training

We recognise that modern slavery is a complex issue and that it is our responsibility to ensure our people have a strong awareness, and understanding of, the relevance of modern slavery to our business, and the ways in which our business decisions have the potential to cause, contribute to, or be directly linked to modern slavery practices in our operations and our supply chains.

FY21 Overview

- We achieved a 99% completion rate against our prior year commitment to conduct modern slavery training for all relevant personnel across the group, with the remaining personnel trained subsequent to the end of the year

Conducted training for relevant personnel

In our 2020 Modern Slavery Statement, we committed to rolling out modern slavery training to our management and procurement staff. Within the year, we conducted modern slavery training for 275 key personnel in management positions, as well as staff involved in procurement practices and supplier selection and onboarding. We finished the year with a 99% completion rate, and have, subsequent to the end of the reporting period, successfully trained all remaining key personnel.

The training was designed to build awareness of the key indicators of modern slavery practices, and to support personnel to identify and appropriately escalate any signs that modern slavery practices may be occurring within our supplier workforce.

In FY22, we plan to introduce a second phase of training for key personnel to further support our approach to identifying and addressing potential risks during the supplier vetting stage. The training will include specific modern slavery risk factors associated with different industries, supplier categories, and geographies, as well as the appropriate remediation protocols where modern slavery instances are found. We also plan to provide all staff throughout United Malt with an introductory session on modern slavery to raise awareness of the issue, and to drive a greater understanding, and acceptance, that modern slavery is connected to most businesses, including our own, and that we have a responsibility to do our part to address those issues.

Modern Slavery Risk Program cont.

Due diligence activities

Our approach to operational due diligence

Our approach to managing risks of modern slavery practices within our operations is underpinned by the regulatory environments in the geographies in which we operate and is supported by our robust policy environment relating to labour rights and standards. This includes, among other things, our [Code of Conduct](#), which outlines how we expect directors, employees, and contractors to behave and conduct themselves towards each other, and requires compliance with the laws in the countries in which we operate. Given the well-established controls in place to mitigate risks of modern slavery within our operations, our due diligence activities focus on the modern slavery risks within our supply chain.

Our approach to supplier due diligence

Taking a risk-based approach, our due diligence activities focus on the identification of modern slavery risk areas to inform where, and how to appropriately direct United Malt's resources for further enquiry and action.

FY21 Overview

- We implemented our revised supplier screening and onboarding process across all geographies with the introduction of a new Compliance Information Declaration Form, which all third parties are required to complete
- We commenced targeted due diligence activities over suppliers identified to be within our higher risk categories through the distribution of questionnaires to gain a deeper understanding of the supplier's modern slavery risk profile and management practices.

Revised supplier screening and onboarding process

Last year, we outlined details of our supplier due diligence approach which was under development. During the year, we successfully implemented the below tiered approach across our geographies which features a new supplier Compliance Information Declaration Form:

- All new direct suppliers are required to complete the new supplier Compliance Information Declaration Form, which sets out our standards and expectations, requires any potential suppliers to agree to adhere to our policies (including a requirement that the supplier agree to have in place appropriate due diligence to ensure there is no modern slavery within their supply chain), and requests information about the supplier's business activities and geographical operating locations. Based on the response, our supplier vetting teams assess the degree of inherent modern slavery risk that may be present in the supplier's operations and supply chain with the consideration of various matters, including, among other things, the industry and geography in which the supplier operates and produces the goods.
- If the supplier is determined to have a moderate to high level of risk of modern slavery inherent in its operations or supply

chains, the supplier is required to complete a second, more comprehensive questionnaire to request information about the supplier's modern slavery policies, staff training, labour hire practices, workplace health and safety, and information about their suppliers. Engaging with the supplier is then escalated for relevant leadership approvals, in consultation with the Modern Slavery Working Group, where various matters are considered, including identified modern slavery risks, mitigating actions taken by the supplier, and the willingness of the supplier to take mitigating actions.

Our due diligence procedures are performed in-house, and any verification procedures undertaken have not been conducted by a third party. We do not currently perform site audits of our suppliers specifically relating to modern slavery risks, however, through our close relationships with our barley suppliers, we maintain visibility over their practices through our regular farm visits to perform quality checks of the annual barley yields.

As part of our targeted due diligence activities in FY22, we will take a risk-based approach to evaluate whether any additional site-based audits are required, particularly over our suppliers within other core risk areas.

In FY22, we will introduce detailed supplier engagement materials, tailored by industry and geography, to support our procurement and vetting staff to conduct streamlined and deeper due diligence over areas of higher risk.

Case study – Supplier engagement challenges

During the year, we faced some resistance from a potential new supplier to respond to our modern slavery questionnaire. Unfortunately, after a number of follow up requests to provide this important information, the supplier did not agree to provide a response. Given the inherent risk presented within this supplier's operating activities and geography, our Modern Slavery Working Group, in consultation with the leadership of the respective business unit, made the difficult decision not to engage this supplier.

We consider choosing not to engage with a supplier, or terminating our engagement with an existing supplier, to be our last resort, and while we would have preferred to work with the supplier to encourage improvements in how modern slavery risks are managed over time, their unwillingness to engage with us on these matters led to our decision not to engage. While we recognise that responding to our questionnaire may take time to complete, we consider this process to be critical to our modern slavery response, as it supports our understanding of the modern slavery risks within our supply chain and informs our mitigating actions.

Distributed questionnaires to existing suppliers

During the year, we commenced a due diligence exercise over selected suppliers within our existing supplier base. The suppliers were selected from our priority risk areas which were identified within the prior year risk assessment performed, including, packaging, labour hire agencies, and raw material suppliers

Modern Slavery Risk Program cont.

where there is a requirement for seasonal or harvest resources. The questionnaires have been distributed to confirm whether our understanding about from where the goods are sourced and additional information relating to the suppliers' management practices to mitigate modern slavery risks. This process will continue into the following year, and we look forward to providing additional detail in our disclosure next year on our findings.

In FY22, we will collate the outputs of the questionnaires sent to our existing suppliers across our global operations and take additional steps to understand and address risks identified. This will include conducting further due diligence activities over our packaging, labour hire agencies and raw material suppliers, mentioned above, to validate our understanding of inherent risks, and to address any identified issues.

Remediation

United Malt did not identify any incidents of modern slavery within the year, and therefore did not conduct any remediation activities within the period.

Grievance mechanism and remediation approach

United Malt remains committed to leading with integrity, accountability and transparency in all areas of our value chain. As such, we continued our partnership with Navex Global (EthicsPoint) in providing an independent, safe and confidential channel for anyone in our value chain to anonymously report concerns, such as those relating to modern slavery and labour

rights. Anyone who wishes to report an eligible disclosure remains protected by our [Whistleblower Protection Policy](#).

We encourage third parties to utilise our ethics portal in good faith. Our customers, suppliers, stakeholders and members of the communities in which we operate may also report modern slavery incidents and risks.

If we become aware of an incident or risk of modern slavery in our operations or supply chains, this will be escalated for review at the senior management level. An appropriate remedy will be determined on a case by case basis having regard to the goal of mitigating modern slavery risks and eradicating incidents of modern slavery.

Concerns can be reported here - [United Malt Whistleblower Protection Disclosure Portal](#)

In FY22, we will develop a remediation policy to establish a modern slavery response protocol to provide clear process guidance for our team members in the event that an instance of modern slavery is identified within either our supply chains or business operations. This protocol will set out our approach to identifying, escalating and investigating identified instances of modern slavery and will include guidance to provide effective remedy as required by the UN Guiding Principles on Business and Human Rights.



Case study

Inserting modern slavery clauses into supplier contract terms – what we learnt?

In FY21, United Malt committed to undertaking a global review of our contracting practices with a view to refining our procurement process. During this work, we found that our goal of inserting clauses prohibiting modern slavery practices into our standard form supplier contracts to be impractical for our procurement team. This was due to many factors, which included utilising purchase orders instead of contracts in certain scenarios, engaging suppliers on their terms and conditions, and also that supplier contracts are often not being refreshed frequently.

In order to facilitate the needs of our procurement team, and communicate our standards and expectations to our suppliers, we implemented our new supplier Compliance Information Declaration Form which outlines United Malt's position on modern slavery and requires any potential suppliers to recognise their adherence to our policies before trade.

Our updated onboarding forms outlining our expectations relating to modern slavery and human rights were implemented across all geographies within the year.

Assessing the effectiveness of our actions

We recognise that we are still in the early stages of our Modern Slavery Risk Program, and we are committed to continue assessing the effectiveness of our program in its design and implementation, and to continue identifying areas for improvement.

External assessment

During the year, we engaged an external advisor to undertake a comprehensive assessment of our Modern Slavery Risk Program and assist with the development of an action plan to further refine our processes. The output of this assessment has subsequently formed a roadmap to allow us to target our due diligence activities throughout FY22-FY25.

Engaging with our people

Throughout the external assessment performed, we conducted cross-functional and geographical engagement with relevant personnel to hear feedback on the existing practices and draw insights into areas requiring attention in the year ahead.

Key insights included:

- We identified some conflicting expectations relating to the roles and responsibilities of personnel throughout the modern slavery supplier vetting process
- There were some concerns raised with regards to the capacity of personnel to take on additional responsibilities, as well as the level of expertise of personnel to make judgements relating to modern slavery risks, and when reviewing supplier responses
- Stakeholders raised the risk that information relating to existing suppliers may be outdated, due to potential gaps in monitoring supplier performance over time, and therefore any changes to where products are being sourced may not have been captured
- Supplier vetting teams expressed concerns that the process felt too burdensome for suppliers due to there already being a large volume of questions being asked of third parties, in addition to the modern slavery questions

The above insights were invaluable to our team and supported our FY22 commitment to formalise our governance structure, allocate appropriate resources, address gaps in our supplier monitoring processes, and refine (where possible) our supplier screening materials.

In FY22, we will establish a schedule to conduct periodic reviews in whole, or in part, over United Malt's existing modern slavery program to assess its effectiveness and drive continuous improvements. The review will consider the effectiveness of the program in its design and its implementation to identify aspects of the program that are not contributing to United Malt's overarching commitment to addressing modern slavery.

In FY22, we will conduct a review over the existing whistleblowing process to understand whether the whistleblowing process meets the needs of all rightsholders throughout our value chain and meets the effectiveness criteria for non-judicial grievance mechanisms as outlined in the UN Guiding Principles on Business and Human Rights.

In FY22, we will establish an internal monitoring and reporting framework over our supplier assessment processes, to facilitate ongoing visibility at appropriate levels throughout the organisation.

Looking ahead

We will continue to take actions to better understand and respond to risks of modern slavery, and broader human rights impacts, within our operations and supply chains. Outlined below are our commitments for the year ahead, all of which have been endorsed by our leadership team. Subsequent to the end of the reporting period, our Modern Slavery Working Group developed an action plan and allocated resources to deliver on the below commitments within the year. We look forward to reporting back on our progress in our next Statement.

Our FY22 Commitments

Governance

- We will formalise the governance structure of our Modern Slavery Risk Program through:
 - The expansion of our Modern Slavery Working Group to include appropriate geographic and cross-functional representation.
 - The development of a Modern Slavery Working Group charter to clearly define roles and responsibilities, maintain accountabilities, and to establish a clear action plan to drive continuous improvements in our program.
- We will develop and formalise a group-wide risk tolerance for modern slavery, and human rights more broadly, to support the development of risk-based due diligence procedures and appropriate responses.
- We will establish an internal monitoring and reporting framework to monitor and communicate the progress and any key findings at regular milestones throughout the reporting period. This will facilitate the ongoing visibility relating to modern slavery related matters at appropriate levels throughout the organisation.
- We will establish a schedule to conduct periodic reviews in whole, or in part, over United Malt's Modern Slavery Risk Program to assess its effectiveness and drive continuous improvements. The review will consider the effectiveness of the program in its design and its implementation, to identify aspects of the program that are not contributing to United Malt's overarching commitment to addressing modern slavery.

Training

- We will introduce a second phase of training for key personnel to further support our approach to identifying and addressing potential risks during the supplier vetting stage. The training will include specific modern slavery risk factors associated with different industries, supplier categories, and geographies, as well as provide training on the appropriate remediation protocols where modern slavery instances are found.
- We will provide all staff throughout United Malt with an introductory training session on modern slavery, to raise awareness of the issue and to drive a greater understanding and acceptance that modern slavery is connected to most businesses, including our own, and that we have a responsibility to do our part to address those issues.

Supply chain mapping and risk assessment

- We will commence supply chain mapping and perform an inherent risk assessment exercise over our Tier 1 existing supplier base. This will include, at a minimum, not only from where the goods are sourced, but also where the goods are produced. We will also analyse the causal relationship we have to the risks identified, which will inform United Malt's response.

Supplier engagement materials

- We will introduce detailed supplier engagement materials, tailored by industry and geography, to support our procurement and vetting staff to conduct streamlined and deeper due diligence over areas of higher risk.

Mapping and risk assessing our shipping and logistics suppliers

- We will commence mapping and assessing the risks of human rights violations within our shipping and logistics supply chain.
- As part of this, we will explore opportunities with other industry partners and civil society organisations to drive collective actions to address systemic issues within the shipping industry.

Continue due diligence activities over existing suppliers

- We will collate the outputs of the questionnaires sent to our existing suppliers across our global operations and take additional steps to understand and address risks identified. This will include conducting further due diligence activities over our packaging, labour hire agencies and certain raw material suppliers to validate our understanding of inherent risks and to address any identified issues.

Expansion of our due diligence program

- Recognising that modern slavery is only one example of a human rights violation, United Malt will explore the expansion of our program to capture broader human rights impacts. At a minimum, we will conduct a human rights salience assessment to identify our salient human rights issues and establish a strategy to integrate broader human rights issues into our Modern Slavery Risk Program.

Remediation

- We will conduct a review over the existing whistleblowing process to understand whether the whistleblowing process meets the needs of all rightsholders throughout our value chain and meets the effectiveness criteria for non-judicial grievance mechanisms as outlined in the UN Guiding Principles on Business and Human Rights.
- Informed by the above review, we will develop a remediation policy to establish a modern slavery response protocol to provide clear process guidance for our team members in the event that an instance of modern slavery is identified within either our supply chains or business operations. This protocol will step out our approach to identifying, escalating and investigating identified instances of modern slavery, and will include guidance to provide effective remedy as required by the UN Guiding Principles on Business and Human Rights.

Appendix A

Entities owned or controlled by United Malt which are covered by this Statement

Entity name	Company identifier	Registration jurisdiction	Reporting entity (Y/N)	Relevant Act
United Malt Group Limited	ABN 61 140 174 189	Australia	Y	AU
United Malt Australia Pty Ltd	ABN 84 140 208 680	Australia	N	AU
Australia Malt Holdco Pty Ltd	ABN 18 121 418 899	Australia	Y	AU
Australia Malt Finco Pty Ltd	ABN 35 121 418 906	Australia	Y	AU
Barrett Burston Malting Co Pty Ltd	ABN 39 050 142 526	Australia	Y	AU
Barrett Burston Malting Co WA Pty Ltd	ABN 34 009 079 645	Australia	N	AU
Malt Real Property Pty Ltd	ABN 25 050 552 782	Australia	N	AU
Security Superannuation Fund Pty Ltd	ACN 65 548 343	Australia	N	AU
Barrett Burston Malting Co. (NZ) Limited	NZBN 9429041152447	New Zealand	N	NZ
Canada Malting Co. Ltd	Canada Corporation Number 454021-2	Canada	Y	CA
United Malt (Canada) Holdings UK Limited	CRN 07061049	United Kingdom	N	UK
United Malt UK Limited	CRN 07058755	United Kingdom	N	UK
Malt UK Holdco Limited	CRN 05912580	United Kingdom	N	UK
Ulgrave Limited	CRN 03159144	United Kingdom	N	UK
Bairds Malt Limited	CRN 03580592	United Kingdom	Y	UK
Maltco 3 Limited	CRN 02431308	United Kingdom	N	UK
Brewers Select Limited	CRN 08212390	United Kingdom	N	UK
Norton Organic Grain Limited	CRN 08059243	United Kingdom	N	UK
Moray Firth Maltings Limited	CRN 03599528	United Kingdom	N	UK
Mark Lawrence (Grain) Limited	CRN 03646792	United Kingdom	N	UK
Scotgrain Agriculture Limited	CRN 03609458	United Kingdom	N	UK
Bairds Malt (Pension Trustees) Ltd	CRN 02426370	United Kingdom	N	UK
United Malt Holdings USA	File Number 4750441	United States	N	US
United Malt USA, Inc	File Number 4745587	United States	N	US
Malt U.S. Holdco Inc	File Number 4211171	United States	N	US
Metropolitan Insurance Group	File Number 0394905	United States	N	US
Great Western Malting Co.	File Number 2184031	United States	Y	US

Appendix B

Alignment to mandatory reporting criteria Australia - Modern Slavery Act 2018 (CTH)

Relevant section	Requirement	Section	Page
s 16(1)(a)	A modern slavery statement must, in relation to each reporting entity covered by the statement, identify the reporting entity	Cover	B
s 16(1)(b)	A modern slavery statement must, in relation to each reporting entity covered by the statement, describe the structure, operations and supply chains of the reporting entity	Structure, operations and supply chains	5-6
s 16(1)(c)	A modern slavery statement must, in relation to each reporting entity covered by the statement, describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Modern slavery risks	7
s 16(1)(d)	A modern slavery statement must, in relation to each reporting entity covered by the statement, describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Modern Slavery Risk Program	8-10
s 16(1)(e)	A modern slavery statement must, in relation to each reporting entity covered by the statement, describe how the reporting entity assesses the effectiveness of such actions	Assessing the effectiveness of our actions	11
s 16(1)(f)	[For joint modern slavery statements] A modern slavery statement must, in relation to each reporting entity covered by the statement, describe the process of consultation with: (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a statement under section 14—the entity giving the statement	Consultation	4
s 16(1)(g)	A modern slavery statement must, in relation to each reporting entity covered by the statement, include any other information that the reporting entity, or the entity giving the statement, considers relevant	Training Looking ahead	8 12

Appendix B

Alignment to mandatory reporting criteria United Kingdom - Modern Slavery Act 2015

Relevant section	Requirement	Section	Page
54(5)(a)	An organisation's slavery and human trafficking statement may include information about the organisation's structure, its business and its supply chains	Structure, operations, and supply chains	5-6
54(5)(b)	A [...] statement may include information about its policies in relation to slavery and human trafficking	Modern Slavery Risk Program Modern Slavery Policy	8-10 Appendix C
54(5)(c)	A [...] statement may include information about its due diligence processes in relation to slavery and human trafficking in its business and supply chains	Modern Slavery Risk Program: Due diligence activities	9
54(5)(d)	A [...] statement may include information about the 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	Modern slavery risks Modern Slavery Risk Program	7-10
54(5)(e)	A [...] statement may include information about its 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	Assessing the effectiveness of our actions	11
54(5)(f)	A [...] statement may include information about the training about slavery and human trafficking available to its staff	Modern Slavery Risk Program: Training	8

Appendix B

Alignment to mandatory reporting criteria US - Transparency in Supply Chains Act

Relevant section	Requirement	Section	Page
1714.43 (c) (1)	<p>The disclosure described in subdivision (a) shall, at a minimum, disclose to what extent, if any, that the retail seller or manufacturer does each of the following:</p> <p>Engages in verification of product supply chains to evaluate and address risks of human trafficking and slavery. The disclosure shall specify if the verification was not conducted by a third party.</p>	Modern Slavery Risk Program: Due diligence activities	9
1714.43 (c) (2)	<p>“The disclosure described in subdivision (a) shall, at a minimum, disclose to what extent, if any, that the retail seller or manufacturer does each of the following:</p> <p>Conducts audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains. The disclosure shall specify if the verification was not an independent, unannounced audit.”</p>	Modern Slavery Risk Program: Due diligence activities	9
1714.43 (c) (3)	<p>The disclosure described in subdivision (a) shall, at a minimum, disclose to what extent, if any, that the retail seller or manufacturer does each of the following:</p> <p>Requires direct suppliers to certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking.</p>	Modern Slavery Risk Program: Due diligence activities	9
1714.43 (c) (4)	<p>The disclosure described in subdivision (a) shall, at a minimum, disclose to what extent, if any, that the retail seller or manufacturer does each of the following:</p> <p>Maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking.</p>	Modern Slavery Risk Program: Governance	8
1714.43 (c) (5)	<p>“The disclosure described in subdivision (a) shall, at a minimum, disclose to what extent, if any, that the retail seller or manufacturer does each of the following:</p> <p>Provides company employees and management, who have direct responsibility for supply chain management, training on human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products.”</p>	Modern Slavery Risk Program: Training	8

Appendix C

United Malt Modern Slavery Policy

Please view and download from:

<https://www.unitedmalt.com/wp-content/uploads/2021/02/Modern-Slavery-Policy.pdf>

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Feedback and further information

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