

GrainsConnect Canada Operations, Inc.

***Modern Slavery
Act Report***

(Fiscal Year 2024)

1. Introduction

The Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) requires that businesses state actions they have taken during the fiscal year to prevent and reduce the risk of forced labour or child labour within their operations and supply chain. This is a report for GrainsConnect Canada Operations, Inc. (“GCC”). This report refers to the 2024 fiscal year end, being September 30, 2024 and describes steps taken by the GCC in 2024.

At GCC, our purpose is to bring value to the family farm and connect local farmers to international markets. We recognize our responsibility to respect and protect the human rights of all people who support and intersect with our business throughout our supply chain network. Our suppliers and customers trust that the products we buy and sell come from suppliers that provide safe, fair, and ethical working conditions for workers.

GCC’s commitment to prevent and reduce the risk of forced and child labour applies to our business, our business partners, and our worldwide supply chain network. We expect our business partners and suppliers (as well as their contractors, agents, subcontractors, sub-agents and labour agencies) to uphold these same principles within their operations and adhere to applicable human rights and employment standards laws.

2. Steps taken to prevent and reduce the risk of forced labour or child labour

In 2023, GCC has taken the following steps to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods which GCC buys or sells..

- a. Compliance with all applicable laws
- b. Initial internal assessment regarding risk of forced or child labour in our supply chain

3. GCC Structure, Activities and Supply Chains

Structure

GCC is a Canadian company, founded in 2015, and is a 50/50 joint venture owned by two large global agribusinesses, GrainCorp Limited and Zen-Noh Grain Corporation. GCC is headquartered in Calgary, Alberta and owns four grain handling facilities, two in Alberta and two in Saskatchewan. Additionally, GCC is 50% owner of Fraser Grain Terminal, Ltd., a grain export facility located in Vancouver, British Columbia (“FGT”)

GrainCorp Limited is a public company, listed on the Australian Securities Exchange. It is a diversified Australian agribusiness, with integrated operations spanning four continents and a proud history of delivering for our customers for more than 100 years.

Zen-Noh Group is a federation of agricultural cooperatives in Japan. Since its establishment in 1972 it has grown into one of the largest cooperatives in the world, valued at over 100+ billion yen and supplying products and services to its 1,000+ member cooperative unions in Japan and internationally. The Zen-Noh Group is responsible for supplying food products to consumers across Japan, Asia and other regions. The Group accounts for a major share of food production and supply in Japan. Its operations also include fertilizer, agrichemicals, energy, and a wide variety of other products and services.

Activities

GCC's business is an integrated grain storage and handling network consisting inland terminals located in Maymont, Saskatchewan; Wilkie (Reford), Saskatchewan; Vegreville, Alberta; and Huxley, Alberta. GCC buys grain from farmers mainly to be put through our supply chain for export through our (50% owned) terminal in Vancouver. For transportation services, we either lease the road/rail assets or contract with third parties. The main commodities we handle are wheat, canola, and barley.

Upon purchase of grain from local grower/farmers, GCC elevates, cleans, and sometimes dries grain intended to be loaded onto railcars for transportation to the coast for export. Grain arrives at FGT to be loaded on vessels. GCC relies on our two parent companies (GrainCorp and Zen-Noh Grain) for global marketing into their extensive global network of customers and sells the vast majority of our products to our parent companies. Most GCC products are sold on an FOB basis with product loaded on an ocean going vessel. Where GCC is marketing grain or oilseeds to a customer, it takes a position to seek to capture a margin between prices paid to growers and prices received from customers. Derivatives are used to hedge long and short positions.

Revenue and profits in grain marketing are subject to variability in grain production, prices, the position taken and risk management processes. Ownership of supply chain infrastructure is a competitive advantage as it enables GCC to reliably source supply, provide customers with consistent quality, manage logistics more effectively, and have coordinated access to storage facilities.

Supply Chain

GCC supply chain includes the purchase, storage, transportation, handling, and selling of grain and grain products. GCC purchases grain from a few thousand grower/farmers throughout Western Canada.

For transportation, GCC procures services from Canadian National Railway as well as dozens of 3PL companies (mostly trucking companies).

For storage and handling, GCC procures services almost exclusively from our JV partner, FGT.

For selling of grain, GCC sells the vast majority of grain to our parent companies, GrainCorp and Zen Noh. Additionally, GCC sells small quantities to many other grain consuming companies in Western Canada including grain crushers, animal feed lots, and some feed producing customers.

Other products GCC procures include: Office-based support and equipment including IT hardware and systems, stationery, cleaning services, and personal protective equipment (PPE), including clothing and footwear .

4. Policies and due diligence processes

Through formal policies, primarily the code of conduct, GCC strives to uphold the rights of all people involved in GCC's supply chain.

GCC's policies and due diligence processes are informed by the following policies:

GCC Code of Conduct

GCC's Code of Conduct is founded on a set of defined values which guide how all GCC employees should behave toward each other, our customers, other relevant stakeholders, the community and our environment. The Code of Conduct naturally requires compliance with all laws, and also goes

beyond that, requiring our employees to hold themselves to the highest standard of personal and professional ethical behaviour. The Code of Conduct is approved by the Board of GCC.

Every employee in GCC is given a copy of the code of conduct upon commencement of employment and is obligated by the policies and practices set out in the document.

Whistleblower

GCC has a dedicated Whistleblower hotline which is available to GCC's employees and those within our extended supply chains. Individuals can confidentially report breaches of any GCC policy they may have observed or experienced, including concerns relating to modern slavery practices.

5. Forced labour and child labour risks

At GCC, we are aware that our supply chain and the industry in which we operate present a risk of forced labour and child labour.

Procurement

The vast majority of GCC procurement is made up of grain from small family farms. We are aware that the nature of family farms carry the risk of forced and/or child labour. While we are aware of the risk, we have not identified any instances of forced and/or child labour at any of our suppliers.

Transportation

The vast majority of GCC procured transportation is rail freight from Canadian National Railway ("CN"). CN has published an annual report on fighting against forced labour and child labour in supply chains and therefore carries little risk.

Selling

GCC sales are made mostly to our two parent companies. GrainCorp has published an annual report on fighting against forced labour and child labour in supply chains and therefore carries little risk.

6. Remediation Measures

As GCC has not identified any forced labour or child labour in its business or supply chain, it has not had to take any measures to remediate any forced labour or child labour or to remediate any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities or supply chains.

7. Training

GCC uses a tracking system ("DATS") to monitor employee training and onboarding. While the Code of Conduct does not directly address issues of modern slavery, it affirms our commitment to ensuring everyone working on behalf of the GCC adheres to the highest ethical standards.

8. Assessing Effectiveness

GCC is committed to addressing the risks of forced labour and child labour in our business and supply chains. As described in this Report, GCC has a number of measures to prevent and reduce these risks. However, to date, no actions have been taken to assess the effectiveness of these measures.

9. Approval and attestation

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act), and in particular section 11 thereof, I, in the capacity of [title], attest that I have reviewed the information contained in the report on behalf of the governing body of the entity [or entities] listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed within this report.

- **Leanne Bingleman**
- **VP Finance**
- **June 25, 2025**

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