



## Towards the sustainable **agriculture network**





## Modern slavery statement **2024**

## About this **statement and our structure**

This is our seventh modern slavery statement published in accordance with the United Kingdom Modern Slavery Act 2015, our fifth in accordance with the Australian Modern Slavery Act 2018 and our second in accordance with the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act.

The information set out in this statement is provided as a consolidated description for the Viterra Group, except where information is identified as relevant to specific reporting entities within the group. References to "Viterra", "the group" and "group" and the terms "we" and "our" are used in this statement to refer collectively to the Viterra Group. These collective expressions are used for ease of reference only and do not imply any other relationship between the companies. These expressions are also used where no useful purpose is served by identifying the particular company or companies.

In preparing this joint statement we engaged with each of the reporting entities covered by this statement and consulted the entities we own or control. This process of consultation included a wide variety of stakeholders across our human resources, compliance, sustainability, communications and legal teams.

Viterra Limited is a privately held company incorporated in Jersey. We are owned by three shareholders: Glencore, CPP Investments and the British Columbia Investment Management Corporation (BCI).

Viterra Limited is the parent company of the reporting entities for the purposes of the applicable legislation, and has acted in consultation with these entities, which it controls, and whose revenue exceeds the threshold, and makes this joint statement in relation to the following Viterra entities for the purposes of the applicable legislation:

Reporting entities incorporated in Australia:

Viterra Holdings Pty Ltd; Level 1, 186 Greenhill Road, Parkside SA 5063 (ABN: 87 137 191 023; ACN: 137 191 023) and Viterra Australia Holdings Pty Ltd; Level 1, 186 Greenhill Road, Parkside SA 5063 (ABN: 81 161 229 867; ACN: 161 229 867).

This statement also covers, and Viterra Limited has consulted with, the wholly owned entity, Viterra Operations Pty Ltd, which operates below the threshold of reporting.

Reporting entities incorporated in the United Kingdom:

Viterra UK Ltd; Warren House, Bell Lane, Thame, Oxfordshire, OX9 3AL and Belfurt Limited: Warren House, Bell Lane, Thame, Oxfordshire, OX9 3AL.

Reporting entities incorporated in Canada:

Viterra Canada Inc.; 2625 Victoria Avenue, Regina, Saskatchewan, Canada S4T 7T9 (BN 104725437).

Our sustainability committee, which includes senior executives from the reporting entities, namely our Chief Executive Officer, Chief Financial Officer, Global Head Of Sustainability and Executive Manager Human Resources/ Communications, was also informed and contributed to the development of this statement. The involvement of the sustainability committee is critical as it sets the strategic and policy direction for our global sustainability and community and human rights activities including those relating to eliminating modern slavery from our supply chains.

This committee works to an established charter and is responsible for determining policy and strategy and for monitoring relevant risk management and performance. It reports to the board ESG committee and the board of directors through routinely scheduled risk updates.

This statement was approved by our global executive and board of directors of Viterra Limited (the parent company for the Viterra group) by 26 February, and is signed on its behalf by:

#### David Mattiske

Chief Executive Officer

I have the authority to bind Viterra.

## Table of contents

- 2 About this statement and our structure
- A message from our Chief Executive Officer 3
- How we have addressed the criteria 4
- 5 Who we are
  - 5 Our values
  - 6 Our governance structure
- 7 Our operations and value chain
  - 8 Network map
- 9 **Risks of modern slavery practices**
- Actions and due diligence to address 10 modern slavery risks
  - 10 Our policies
  - Implementation, training and awareness 11
  - Identification and due diligence 12
  - 13 Collaboration and stakeholder engagement
- Assessing the effectiveness of our actions 15
- 16 Disclaimer

## A message from our Chief Executive Officer



# About CEO message Criteria Who we are Our operations Risks Actions Assessment

## 2024 highlights

No reported human rights concerns, including modern slavery, through our channels

Implemented a cross-functional executive led human rights committee Integrated further human rights screening

We have zero tolerance to modern slavery in any form and are committed to upholding peoples' human rights across our network.

Last year, we continued to strengthen our commitment to addressing human rights and modern slavery risks across our operations and supply chains. Our approach remains focused on transparency, governance, and proactive risk management to ensure our business upholds the highest ethical standards.

We are pleased to report that in the past year, no human rights concerns, including modern slavery, were raised through our reporting channels. This outcome reflects our ongoing efforts to embed human rights considerations into our culture and business practices.

To further enhance our governance framework, in 2024, we established a cross-functional, executive-led human rights committee. This group, which includes subject matter experts from our organisation, will play a critical role in driving the implementation of our human rights strategy and strengthening our ability to identify and mitigate risks effectively. We also enhanced our human rights due diligence by integrating a more targeted approach into our screening processes. We have strengthened our ability to assess counterparties' human rights risk management systems, ensuring they align with our commitment to ethical and responsible business practices.

Viterra remains committed to supporting a sustainable and resilient agricultural supply chain while ensuring that our operations do not come at the expense of people, communities, or the environment. Our 2024 modern slavery statement outlines our continued progress in mitigating modern slavery risks and reinforces our dedication to protecting human rights across our global network. This statement was approved by our global executive and board of directors of Viterra Limited (the parent company for the Viterra group) by 26 February 2025.

I attest that I have reviewed the information contained in the report for the entity or entities listed <u>on page 2</u>. 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 reporting year listed above.

#### David Mattiske

Chief Executive Officer

26 February 2025 I have the authority to bind Viterra.

and supply chains

The table below sets out where in this statement we have addressed the criteria under the Australian Modern Slavery Act, the UK Modern Slavery Act and the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act.

UK Modern Slavery Act	Section	Australian Modern Slavery Act	Section	Canadian Fighting Against Forced	Section
Organisation's structure, its business and its supply chains	<ul> <li><u>About this statement and</u> our structure</li> <li><u>Our operations and value</u> chain</li> </ul>	Identify each reporting entity covered by the joint statement	About this statement and our structure	Labour and Child Labour in Supply Chains Act	
		Describe the structure, operations and supply chains of each reporting entity	> <u>Our operations and value</u> chain	The steps the entity has taken during its previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity	<ul> <li>Actions and due diligence to address modern slavery risks</li> </ul>
Parts of the organisation's 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	<ul> <li>&gt; Risks of modern slavery practices</li> <li>&gt; Actions and due diligence to address modern slavery risks</li> </ul>	covered by the joint statement			
		Describe the risks of modern slavery practices in the operations and supply chains of each reporting entity covered by the joint statement and any entities that each of those reporting entities owns or controls	<ul> <li>Risks of modern slavery practices</li> </ul>		
Organisation's policies in relation to	Actions and due diligence to			Its structure, activities and supply chains	> <u>Our operations and value</u> chain
slavery and human trafficking; its due diligence processes in relation to slavery and human trafficking in its business and supply chains	address modern slavery risks > <u>Our policies</u>	Describe the actions taken by each reporting entity covered by the joint statement and any entities that each of	<ul> <li>Actions and due diligence, to address modern slavery risks</li> </ul>	Its policies and due diligence processes in relation to forced labour and child labour	Actions and due diligence to address modern slavery risks > <u>Our policies</u>
Training about slavery and human trafficking available to the organisation's staff	Actions and due diligence to address modern slavery risks > Implementation. training and awareness	those reporting entities owns or controls to assess and address these risks, including due diligence and remediation processes		The parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk	<ul> <li>Risks of modern slavery practices</li> </ul>
Organisation's 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	<ul> <li>Assessing the effectiveness of our actions</li> </ul>	Describe the process of consultation with each reporting entity covered by the joint statement and with any entities that each of those reporting entities own or control	<ul> <li>About this statement and our structure</li> </ul>	Any measures taken to remediate any forced labour or child labour	Risks of modern slavery practices > Human rights assessment > Actions and due diligence to address modern slavery
		Describe how each reporting entity covered by the joint statement assesses the effectiveness of actions being taken to assess and address modern slavery risks	<ul> <li>Assessing the effectiveness of our actions</li> </ul>		risks
The training and capacity building about slavery and human trafficking available to the organisation's staff.	Actions and due diligence to address modern slavery risks > Our policies > Implementation, training, and awareness			Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child	<ul> <li>Assessing the effectivenes of our actions</li> </ul>
				labour in its activities and supply chains The training provided to employees on forced labour and child labour	Actions and due diligence to address modern slavery risk > Implementation, training and awareness
				How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business	<ul> <li>Assessing the effectivenes of our actions</li> </ul>

## Who we are

Viterra is a leading, fully integrated global agriculture network which connects producers and consumers to supply sustainable, traceable and qualitycontrolled agricultural products to end users around the world.

Our business, headquartered in Rotterdam, the Netherlands, covers the whole global supply chain, from the farm gate to the end user.

We use our decades of experience, diverse capabilities and our talented people to create innovative solutions that open up pathways and create value for customers along our supply chains.

We are a responsible long-term business, continually investing in and developing our network, so that we can meet the needs of a growing world.

We are owned by three shareholders who support our vision: Glencore, CPP Investments and British Columbia Investment Management Corporation (BCI).

## Our values

About

#### We make things happen

We are open

to be successful.

We are true to our word.

We partner with colleagues and customers in a positive,

straightforward way, operating

with transparency and integrity

Efficient and effective, we get the job done. We empower our people to make well-informed decisions, fast. We respond to change and pursue opportunity.

#### We are responsible

We care for our colleagues, our customers, our communities and our environment. We prioritise safety and sustainability throughout our business, continuously looking to improve our performance and to maximise the positive contribution we make to the world.

#### We look ahead

We are solutions focused. The future presents us with possibilities. We constantly learn and evolve, developing new ways of doing business to be the leaders in our field.

#### We are connected

Risks

We value diversity and work inclusively to bring together many minds, many talents and many perspectives. Throughout our network, we collaborate respectfully and build successful partnerships that last.



#### Assesment

## Our governance structure

We have a robust system of governance to oversee our sustainability strategy which includes human rights. It is led from the top and is based around our values and code of conduct, so everybody in the business understands their role in ensuring the success, accountability and transparency of the strategy.

#### Governance and accountability

Our sustainability ambitions and actions are overseen by our board of directors and the global sustainability committee. These bodies consider not only our own assets but the sustainability performance of our global supply chains.

Social performance risks are integrated into our enterprise risk register and are routinely reviewed by the board audit and risk committee.

#### Strengthening our governance

Our approach is underpinned by a robust organisational structure that ensures our standards meet or exceed legal requirements and address material risk.

About

Our board ESG committee ensures we operate in an openly sustainable, ethical and responsible manner, and manage our health and safety, environmental, community and human rights risks effectively.

In 2024, we further strengthened our governance with implementation of a cross-functional executive led human rights committee, to drive the implementation of our human rights strategy.

To increase awareness and reduce human rights risk in our business, their responsibilities include:

- advising on initiatives and actions
- developing training programmes
- tracking implementation and effectiveness of performance indicators

We are further supported by our sustainability committee who oversee the development of company-wide policy and programmes, and with regional management teams leading the local implementation. We monitor our performance closely at every level of the business.

#### **Board of directors**

Oversight and regular performance communication

**Board ESG committee** 

ESG and climate risk focus

Global sustainability committee

 $\bigwedge$ 

CEO, CFO, global sustainability & HR functions

Global steering committees

Executive-level carbon, human rights and community investment fund committees

#### Regional CEOs, sustainability leads and global forums

Involvement with suppliers, communities, authorities, NGOs, industry associations and our employees

## Our operations and value chain

 About
 CEO message
 Criteria
 Who we are
 Our operations
 Risks
 Actions
 Assessment

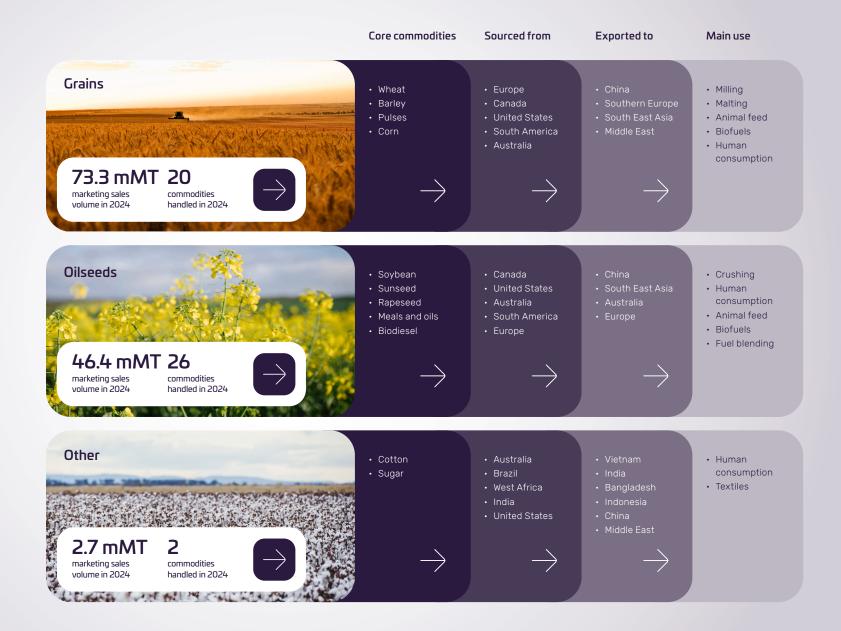
We take great pride in supplying essential food and feed products to the world. Our agricultural network spans 37 countries, drawing on our close relationships with producers and end use customers, connecting them to provide traceable and sustainable agricultural commodities.

We are stewards of some of the world's most critical food and feed supply networks. As one of the largest producer facing businesses in our industry, we source grains, oilseeds, pulses, sugar, rice and cotton from the major growing regions and use our extensive network of assets to store, transport and process them into a range of value-added products, delivering them to the exact quality and specifications our customers expect.

We market to food and animal feed manufacturers, consumer product processors, local importers and distributors, and governments around the world. Our robust network of producers, combined with our strategically positioned assets, gives us the ability to originate supply from a range of origins so we can meet their needs consistently and reliably.

Through our global chartering operations, we provide vessel transportation for a wide range of agricultural commodities. Our extensive fleet of vessels transports to hundreds of ports around the world annually.

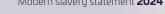
Our diverse and talented workforce of more than 16,000 people have extensive experience in global agricultural supply chains. Together, we provide our customers with dependable and efficient service and open pathways to new business.





Site numbers reflect our 2024 full-year report.

growing regions in the world.



growing regions to ensure products are available when customers need them.

265+ storage facilities in



agricultural commodities and supply

them to customers worldwide.

tonnes of commodities marketed in

122m

marketing offices in

2024

30

30+ processing and

refining facilities in

ready for consumer use.

11 countries

around the world. 26 port terminals in

ships to destinations

9 countries to oversee our commodities from farm gate to customer.

1,356 ocean freight voyages

200 +ocean-going vessels

## **Risks** of modern slavery practices

Viterra does not accept modern slavery practices in any of our business activities, from our third parties or suppliers. We have zero tolerance for any form of modern slavery, including forced, compulsory or child labour as per International Labour Standards (ILO) standards, physical assault or harassment within our workplace.

We are aware that agricultural supply chains and the vast number of suppliers involved can include products associated with human rights related risks including modern slavery. Based on information from agriculture industry reviews and our own assessments, potential human rights related risks include:

- the use of child labour as per ILO standards
- the use of forced labour
- purchasing grain commodities from suppliers in countries and regions where labour rights may not be protected or where employers may utilise vulnerable low-skilled workers
- the health and safety of workers and local communities
- the impact on communities and their traditional livelihoods due to monoculture, land use for cash crops, volume of water use, and the impact of effluent and wastes
- forced resettlement of communities, including indigenous people
- transporting goods over land and ocean with an associated risk of human trafficking through the black market discrimination of people.

#### ESG risk analysis

In 2024, Viterra maintained its public ESG rating conducted by Morningstar Sustainalytics, with a score of 25.7, placing us within the top five of more the 100 agriculture companies assessed.

The report identified Viterra has a medium risk potential from our exposure to human rights issues through our cotton and sugar cane supply chains.

However, the report rated our human rights risk management as strong, noting our board-level ESG committee and our modern slavery statement and supplier code of conduct as supporting this assessment.

#### Human rights risk assessment

In 2024, we continued our human rights due diligence as specified in the UN guiding principle 17. This process included assessing potential human rights risks within our supply chain, acting on the findings and communicating these and tracking responses.

We engaged an external provider to refresh our human rights risk assessment. This involved reviewing the current human rights risks within our operations and supply chain, our human rights governance structure and human rights policy, and identifying requirements for policy development or further actions, specifically in areas such as child labour, modern slavery and forced labour.

The report highlighted a potential for child labour and human trafficking risks in sourcing and farming activities. It emphasised these risks as areas Viterra should focus on going forward.

In response to the assessment and its recommendations to action, in 2024 we have completed:

- strengthening governance with implementation of a crossfunctional human rights working group
- integrating further human rights screening into our know your counterparty screening tool

We have also continued working on:

- developing modern slavery training and continuing to raise its awareness across Viterra
- reviewing the recommendations on changes to our human rights policies and procedures and how best to implement them to ensure effectiveness.

## Actions and due diligence to address modern slavery risks

Our approach to identifying and addressing modern slavery risks includes:

Our code of conduct and policies Implementation, training and awareness

n, Identification and due diligence Collaboration and stakeholder engagement

## **Our policies**

Our policies are the first step in our approach to addressing modern slavery. We have established a comprehensive suite of policies for both internal and external use available on our website, and internal use only which are available in multiple languages to employees.

Our policies are developed and owned by the relevant department(s) and signed off before being published/rolled out.

Policy or document	Relevance to modern slavery	How it is availabl	
Statement of values	Our values include how we are responsible for people and communities, continuously looking to improve our performance.	Viterra.com, interna systems and introductory training View	
	They explain that we are true to our word and partner with customers in a positive way operating with transparency and integrity.		
	They also state how we make things happen and empower our people to make well-informed decisions.		
Code of conduct	Our code of conduct applies to everyone working for Viterra, in all locations and across all functions. All employees, contractors, directors and officers are expected to understand the code and apply it to each of our roles and responsibilities.	Viterra.com, internal systems and introductory training	
	It includes information on raising concerns, our people, human rights and communities.	View	
	Our code encompasses information from our policies including our zero tolerance for forced labour and child labour in our workplace or along our supply chains, and our commitment to paying at least minimum wages in accordance with local regulations.		
Human rights policy	Our human rights policy applies to all Viterra employees and contractors and states our fundamental commitment to respect human rights consistent with the UN Universal Declaration of Human Rights.	Viterra.com and internal systems	
	It includes our zero tolerance towards any form of workplace discrimination, forced labour, child labour, physical assault or harassment within our workplace or along our supply chains.	View	

Policy or document	Relevance to modern slavery	How it is availabl	
Global anti- corruption policy	Our global anti-corruption policy applies to all employees and sets out our expectations for everyone in our business to subscribe to the Viterra culture. Our culture requires employees to abide by the highest ethical standards at all times irrespective of subtleties of legal interpretation in different countries.	Viterra.com, internal systems and annual training <u>View</u>	
	This policy informs colleagues that any form of criminal activity in our business is unacceptable. Whatever the circumstances, personal or collective, profiting from bribery or other acts of corruption goes against Viterra's fundamental values and will not be tolerated in any part of our business.		
HSEC policy	Our health, safety, environment and community (HSEC) policy is underpinned by our values and our approach to sustainability.	Internal systems and is visually displayed at appropriate	
	It states how we uphold human rights and support the long-term development of the local communities in which we operate.	locations <u>View</u>	
Whistleblowing policy	Our whistleblowing policy sets out our approach in respect of the reporting, escalating, handling/investigating and remedying of reportable concerns related to our business.	Global policy - internal systems Australian policy -	
	This policy is intended to encourage and support employees to report concerns with the knowledge that we take them seriously, handle and/ or investigate them appropriately and respect confidentiality. It aims to reassure employees that Viterra will not tolerate any retaliation made against them for reporting a concern.	viterra.com.au	
Supplier code of conduct	Our supplier code of conduct defines our expectations for all suppliers in our supply chains with regard to ethical business practices, health and safety, food and feed safety, labour standards and human rights, the environment and local communities.	Viterra.com and internal systems	
	It is based on internationally accepted standards, as well as our values, code of conduct and policies including our anti-corruption and human rights policies.		
	This code applies to any individual, organisation or company that provides, sells or leases materials, products or services directly to any company within the Viterra corporate group, including the farms and plantations from which our commodities are sourced.		
	We published this code on our website in 2023, <u>read more about how we</u> are implementing it.		
Soy sustainability policy for South America	Our soy sustainability policy for South America outlines how we plan to eliminate soy-driven deforestation and conversion of natural ecosystems from our network, while simultaneously reducing greenhouse gas emissions from land use change (LUC) and biodiversity loss.	Viterra.com and internal systems	
	The policy applies to all soy and its derivatives originated in South America that are sourced and supplied through Viterra.		
	It includes our commitments to respecting the rights of indigenous and local communities, and providing access to our grievance mechanism for stakeholders to raise concerns.		

## Implementation, training and awareness

Implementation, training and awareness is key in addressing modern slavery risks since policies only matter to the extent they are put into practice. Our training empowers and guides employees on how they should identify, approach and raise potential breaches of modern slavery so we can address them.

As with our policies, our training packages are developed and owned by the relevant department(s), and records of all completed training sessions are maintained by the appropriate compliance or human resources contact.

Our workforce is required to complete annual training which covers, amongst other subjects, Viterra's approach to upholding human rights, our code of conduct, anti-bribery and corruption, conflict of interest and sanctions.

#### Code of conduct training

On a yearly basis, we provide our employees with training on Viterra's code of conduct, which includes our approach to respecting and upholding human rights throughout our operations. Specifically mentioned in the code is Viterra's zero tolerance for any form of forced labour or child labour as per ILO standards in our supply chains, and our commitment to paying at least minimum wages in accordance with local regulations.

Last year, we enhanced our code of conduct training to include a human rights section to increase employees' awareness of this important topic and assess their understanding of how to raise a human rights concern should they see one.

In most instances, the training is completed via an e-learning platform. When employees cannot easily access online training, we provide guidance in other ways including pre-shift training and toolbox talks. Additionally, where relevant, our compliance teams give face-to-face training on our policies and procedures to raise awareness about compliance risks related to their functions.

We provide grievance mechanisms for our stakeholders throughout our operations to raise any issues that go against our code.

#### Human rights policy training

Our human rights policy lays out our commitment to respecting human rights and is consistent with the United Nations Universal Declaration of Human Rights in relation to modern slavery. This document specifically lists Viterra's zero tolerance for forced labour and child labour as per ILO standards in our workplace or along our supply chains.

We sent the policy to all employees with work email addresses globally, and in Australia, training on the policy is included in the code of conduct training package.

#### **Raising concerns**

Employees also receive training on raising concerns which includes our expectation that we are informed of any situation in which the Viterra code of conduct, its underlying policies or the law appear to be breached.

They may raise the concern with their supervisor or manager, an appropriate manager from another department, their local compliance contact or by utilising our <u>raising concerns programme</u>.

#### Supplier code of conduct implementation

We are taking a risk-based approach in implementing the supplier code of conduct which defines our expectations for all suppliers in our supply chains with regard to ethical business practices, health and safety, food and feed safety, labour standards and human rights, the environment and local communities.

The first step is making suppliers aware of the code and working with them to share the same standards of how we operate responsibly and sustainably for the benefit of our customers, communities, employees and the environment as well as future generations. All suppliers working on a Viterra site must continue to comply with site-specific requirements.

We rolled out the code to all regions in 2023 and are working towards implementing the code which reinforces the value we place on operating sustainably through our network, improves transparency and ensures we can take the necessary steps to ensure the suppliers we work with uphold the same principles as Viterra.

## Identification and due diligence

We have a philosophy of giving responsibility to individuals within Viterra. With that responsibility comes the obligation to act ethically and identify and report human rights breaches including modern slavery through our mechanisms.

Our due diligence processes enable us to help mitigate modern slavery risk in our supply chain.

#### **Raising Concerns programme**

If one of our people believes they have encountered a breach of policy, including human rights and modern slavery, we encourage them to raise it promptly with their supervisor or manager. Alternatively, the individual may bring it to the attention of another manager, a local compliance contact, or a member of Viterra's business ethics committee, which is made up of our Chief Executive Officer, Chief Financial Officer, General Counsel and Global Head of Compliance.

However, if they feel their concern remains unresolved or wish to remain anonymous we provide our Raising Concerns programme where people can submit the matter.

Anyone, whether from our business or not, can use the programme to raise a concern. It provides different contact options and considers local conditions, languages and ease of use with telephone and online platforms.

Viterra does not penalise anyone for raising a concern in good faith, including demotion, penalty or any other disciplinary action.

The Raising Concerns programme is advertised and promoted via dedicated training and visual material, such as posters, available throughout work sites.

There were 51 concerns raised through our Raising Concerns platform in 2024 and investigated by our compliance team, none of which were modern slavery or human rights related.

#### Know your counterparty procedure

Our know your counterparty framework sets out a risk-based assessment process, where we screen our business partners to identify and mitigate exposure to potential money laundering, terrorism financing, corruption, bribery, sanctions and human rights violations. There is a global screening system in place and local checks can also be carried out.

Across our global business there are requirements to screen counterparties and our know your counterparty procedure has been altered specifically for different regions based on their supply chains and risk levels.

Following successful trials, we rolled out an updated screening platform in our Rotterdam, Netherlands office, as well as in our UK and Australian operations in 2024. The platform facilitates the digital KYC process and automates elements of the process to make this important screening step quicker and simpler to do. We are continuing work to roll out this new platform to more regions in 2024, including Canada.

#### Supplier due diligence in our soy supply chains

We incorporate a georeferencing farm monitoring system into our soy procurement operations to monitor suppliers.

The system monitors soy suppliers and their farms for relevant environmental, social and legal information. It combines up-to-date imagery sources with data from sources such as embargoes of the Brazilian Institute of Environment and Renewable Natural Resources (IBAMA), the Amazon Protection System, Green Protocol of Grains at Pará state, Amazon Soy Moratorium and Modern Slavery.

We carry out a deeper analysis for all suppliers who are flagged for not meeting the minimum requirements. We will guide the supplier on how to improve, or we may decide not to work with them if the issue shows they do not comply with our soy sustainability policy for South America or any other socio-environmental requirements.

#### EUDR due diligence project

This year, we improved traceability and enhanced our due diligence framework to comply with the European Union Deforestation Regulation (EUDR), ensuring readiness for evolving trade requirements. This includes collecting geolocation data, verifying legal compliance and submitting due diligence statements.

EUDR compliance ensures products are deforestation-free and comply with relevant laws, including human rights and labour protections. Companies must assess and mitigate risks related to forced labour and land rights violations in their supply chains.

While this legislation will now come into effect only at the end of 2025, Viterra's EUDR-related due diligence framework has been independently assessed as ready to comply with this regulation based on its initial implementation date of 30 December 2024.

## International Sustainability and Carbon Certification (ISCC)

We are members of the ISCC as part of our focus on sourcing commodities from sustainable supply chains.

ISCC is a global leading certification system that certifies the sustainable origins of the agricultural produce we market and supply. It is aimed at reducing greenhouse gas emissions, using land sustainably, and maintaining socially responsible production of agricultural materials. This includes compliance with human, labour and land rights and responsible community relations.

#### Monthly internal management reporting

Each month we require local departments to collate any raised issues in their jurisdiction.

This includes any human rights issues which could identify modern slavery breaches in our supply chain. The report is shared within the business globally with any issues raised with the appropriate management for action.

We have not had a modern slavery related breach reported through this mechanism.

## Collaboration and stakeholder engagement

We collaborate across our business on human rights and modern slavery risks and how we prevent them, while also ensuring we allow for regional based approaches to ensure effectiveness in our actions.

We also believe collaboration with our suppliers, business partners and industry, and non-government and government organisations is required to make real and effective change in addressing modern slavery risks.

We are focused on ensuring our suppliers understand our zero tolerance policy on human rights and modern slavery breaches. Our supplier code of conduct defines our expectations and we have continued adding modern slavery clauses to local contracts.

We evidence our commitment through our participation in international conventions, including the United Nations Global Compact, a set of principles covering human rights, labour, environment and anti-corruption and the standards set out by the International Labour Organization (ILO). Viterra is a member of many organisations and standards organisations providing opportunities for shared learnings and valuable insights to inform our response to modern slavery and broader human rights issues.

We worked or collaborated with the following organisations during 2024:

#### United Nations Global Compact (UNGC)

Viterra has been a member of the UNGC since 2018, an organisation which calls on its members to align their operations with universal principles on human rights, labour, environment and anti-corruption. As a member, Viterra pledges to implement changes to business operations and strategy, incorporating the Ten Principles of the UNGC.

Viterra also supports the 17 United Nations Sustainable Development Goals (UNSDGs) which are mapped to our sustainability pillars.

This includes:

**SDG 8** – Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.

**Target 8.7** – 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.

## Brazilian Association of Vegetable Oil Industries (ABIOVE)

Viterra is associated with ABIOVE, which represents companies who produce meal, vegetable oils and biodiesel in Brazil and cooperates in the implementation of sector policies, promotes sustainability programmes and generates statistics used in sectorial studies.

Since 2006, the soy production chain has adopted a zero tolerance policy towards labour conditions analogous to slavery. This includes a contractual clause in soy purchases whereby they can terminate trade agreements if there is evidence of abusive labour in their supply chain.

ABIOVE defends the commitment not to trade soy produced on properties with deforested areas, embargoed by environmental monitoring entities or included in the list of slave labour. As part of this focus, it is a signatory of the National Pact for Eradication of Slave Labour – Instituto Ethos, International Labour Organization (ILO), Repórter Brasil, and the Pará State Grain Protocol.

Through our work with ABIOVE we also support InPACTO which is a non-governmental organisation with the mission to promote the prevention and eradication of slave labour in production chains in Brazil.

## Collaboration and stakeholder engagement

#### Round Table on Responsible Soy (RTRS)

Viterra is a member of RTRS Production Standard which aims to guarantee responsible business and agricultural practices by preserving biodiversity, soil and water, protecting human and workers' rights, respecting the customs and cultures of indigenous peoples and improving the wellbeing of local communities.

#### **Better Cotton Initiative (BCI)**

BCI supports farmers by helping them understand and respect national legal requirements, as well as the fundamental, interrelated ILO conventions on respecting the minimum age for young workers and avoiding child labour. BCI does not accept forced and child labour on cotton farms, including where orchestrated by government. If BCI discovers these practices where its cotton is produced, BCI considers it non-compliant with its standards and responds immediately.

#### Cotton made in Africa (CmiA)

CmiA's high standards strictly prohibit child labour outside of a family context, any form of exploitative child labour or where a child's health or development may be harmed. CmiA does not consider prohibition enough on its own, it also actively seeks to combat child labour through local education work, school projects for children from farming families, and measures designed to increase family incomes.

CmiA significantly contributes to improving the living conditions of smallholder farmers in Sub-Saharan Africa by aiding trade. In addition, participation in the programme also forbids slavery and human trafficking according to international labour standards on child labour conventions, deforestation of primary forests, or the use of genetically modified cotton.

#### Roundtable on Sustainable Palm Oil (RSPO)

RSPO prohibits the use of forced labour. Its members aim to influence change through initiatives that bring industry participants together to elevate the protection of human rights and ensure the sustainable production of palm oil.

#### Bonsucro

Much of the world's sugarcane is grown in countries where working conditions are poor. Bonsucro aims to drive and support decent work for smallholder farmers and farm and mill workers, with zero tolerance for forced labour and child labour. It ensures safe recruitment for migrant workers and reduces discrimination in all its forms.

#### Supplier Ethical Data Exchange (Sedex)

Sedex is a non-profit global data platform that provides tools and services to help companies identify, assess, and mitigate supply chain risks, including those related to human rights and modern slavery. Nominated Viterra facilities participate in Sedex by maintaining registration, completing self-assessment questionnaires, and participating in periodic third-party audits as required.

Sedex audits, particularly through the Sedex Members Ethical Trade Audit (SMETA) framework, assess various human rights aspects to identify and mitigate risks associated with modern slavery. They evaluate factors such as forced labour, child labour, employment eligibility, ethical recruitment practices, workplace safety, discrimination, harassment, fair compensation, freedom of association, collective bargaining rights, and the treatment of indigenous communities. By examining these areas, Sedex audits help organisations ensure ethical labour practices and uphold human rights within their supply chains.

## **Assessing** the effectiveness of our actions

Viterra is committed to being part of sustainable change, including the elimination of modern slavery within agricultural supply chains.

Through our actions and due diligence to identify and address modern slavery risks, we have not highlighted any forced labour or child labour in our activities and supply chains. We have also not identified any loss of income to vulnerable families due to measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

Though we had no reported breaches in 2024 through our various channels, we continue to develop our approach to potential modern slavery risks identified.

Throughout our operations, we seek to avoid complicity in human rights abuses and uphold relevant international standards, supporting the goal of reducing any exploitation of individuals at the hand of others.

We are focused on ensuring our suppliers understand our zero tolerance policy on human rights and modern slavery breaches. We continue to work through implementation of our supplier code of conduct to ensure all suppliers in our supply chain understand our expectations that require them to align with our standards, <u>values</u>. code of conduct and policies.

We acknowledge the need for further action across the industry and believe collaboration with our suppliers, business partners and industry, and non-government and government organisations is required to make real and effective change in addressing modern slavery risks.

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