



NUFARM LIMITED
2023
Modern
Slavery
Statement

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The following modern slavery statement is made on behalf of Nufarm Limited (Nufarm) as required under the Australian Commonwealth Modern Slavery Act 2018 and the UK Modern Slavery Act 2015.

Modern slavery describes exploitative situations where a person cannot refuse or leave because threats, violence, coercion, deception or abuse of power deprive them of their freedom. Modern slavery can take the form of trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour where children are subjected to slavery or similar practices or engaged in hazardous work.^{1,2} The Walk Free Foundation's 2023 Global Slavery Index identified that in 2021 there were 50 million people living in modern slavery on any given day, an increase of 10 million since 2018.²

Nufarm Limited (as the global parent company) has two key platforms: crop protection and seeds technology. It is publicly owned and listed on the Australian Securities Exchange (ASX), with symbol NUF. Our registered office is located at 103–105 Pipe Road, Laverton North, Victoria, Australia. As permitted under the Australian Commonwealth Modern Slavery Act, this is a joint statement prepared by Nufarm for the following reporting entities:

- Nufarm Limited (ABN 37 091 323 312)
- Nufarm Australia Limited (ABN 80 004 377 780)
- Medisup Securities Limited (ABN 13 090 761 523)
- Agryl Holdings Limited (ABN 61 005 968 178)
- Nuseed Global Holdings Pty Ltd (ABN 36 623 104 950)
- Nuseed International Holdings Pty Ltd (ABN 30 623 104 987)
- Nuseed Pty Ltd (ABN 82 088 231 814)
- Nugrain Pty Ltd (ABN 31 085 901 604)
- Danestoke Pty Ltd (ABN 50 088 231 681)

which all had a consolidated revenue greater than AUD100 million for the reporting period and conducted business in Australia during the reporting period. Medisup Securities Limited, Agryl Holdings Limited, Nuseed Global Holdings Pty Ltd, Nuseed International Holdings Pty Ltd, Nugrain Pty Ltd and Danestoke Pty Ltd are deemed resident in Australia for income tax purposes, but operate as holding companies only.

Since Nufarm Limited is also the controlling entity, this statement describes the supply chain and operations for both reporting and non-reporting entities within the Nufarm Group globally and actions taken to assess and address modern slavery risks. It also responds to the requirements of the UK Modern Slavery Act for our company Nufarm UK Limited (Company number 02882993) which had an annual turnover of more than GBP36 million and conducted business in the United Kingdom during the reporting period.

References to 'Nufarm', 'the organisation', 'we', 'our', 'us' are to Nufarm Limited and the wholly owned subsidiaries included in Appendix 1.

This statement applies to our financial year 1 October 2022 to 30 September 2023, referred to as 'FY23' and 'this year'.

Our Canadian entity, Nufarm Agriculture Inc. (business number 881976773), is also subject to Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023*, which came into effect on 1 January 2024. Nufarm Agricultural Inc. plans to prepare and submit a FY23 modern slavery statement to Public Safety Canada by 31 May 2024.

This statement contains forward-looking statements which involve known and unknown risks, uncertainties and assumptions, some of which are beyond Nufarm's control. As a result, actual performance or achievements may be significantly different.

The spend analytics included in this report have been prepared in good faith to provide scope and context to our supply chain disclosures. In preparing this information:

- We have used payments made to suppliers this year to expand our scope of reporting. In previous years we reported this information on a goods received basis which had a reduced spend scope due to business system limitations.
- We were unable to include payment data from our companies Croplands Equipment in both Australia and New Zealand, Nufarm KK in Japan, Nufarm Korea, and Nufarm Middle East Operations in Egypt.
- We cannot exclude amounts paid to customers as rebates because these are treated as supplier transactions in our business systems.
- We have excluded local goods and services and value-added type taxes (GST and VAT) and bank payments.
- All transactions are converted to AUD using our monthly corporate exchange rates.
- The country of origin is used as the source country for our direct purchases; however, the country of supplier incorporation is used as the source country for our indirect purchases.

¹ Attorney-General's Department. (2023). Commonwealth Modern Slavery Act, Guidance for Reporting Entities. May 2023* Commonwealth of Australia.

² Walk Free Foundation. (2023). The global slavery index 2023. Walk Free Foundation.

About this statement continued

This statement was approved by Nufarm Limited's board of directors on 22 March 2024 and signed by Nufarm's managing director and chief executive officer, Greg Hunt. It was submitted to:

- The Australian Government Attorney-General's Department's Modern Slavery Register
- the UK Modern Slavery Statement Register, as required by the UK Government.

It was also published on the home page of our corporate and UK company websites.

A message from our Managing Director and CEO

I am pleased to present our Modern Slavery Statement for FY23 which outlines our operations and supply chain, and the actions we are taking to identify and reduce our modern slavery risk.

Nufarm is committed to conducting business honestly, ethically and responsibly. We uphold human rights, and we seek to partner with suppliers who share our standards. We take a zero-tolerance approach to modern slavery practices, and we work to identify and mitigate modern slavery risks.

As a global agricultural innovator, we recognise that modern slavery can potentially enter our supply chain and operations, particularly in higher risk countries. We remain especially vigilant for modern slavery risks in countries and industries where people are more vulnerable to exploitation and where legal and institutional protections are weak.

This year we completed our business-wide modern slavery assessment, giving us insight into the risks and controls in our operations, and we took tangible steps towards improving the equity and stability of employment for workers in our Asian operations.

Recognising the importance of sustainability in our supply chain, we employed a dedicated sustainable procurement lead. This allowed us to increase the number of suppliers in our corporate social responsibility assessment program.

The importance of our seeds business to our group strategy is growing, and we are proud of the sustainability benefits of these products. To help uphold human rights in this supply chain this year, we began conducting modern slavery audits in one of our key seed growing regions, Türkiye. We were pleased to find no matters of concern and aim to complete this work in FY24.

In accordance with our human rights policy, we remain committed to employing workers who have freely given their consent to employment and who are of legal age and status to work, and to undertaking business with suppliers and contractors who share this goal. This year we continued to focus our modern slavery risk mitigation efforts on the areas of our operations where our employees are located in countries we identified as higher risk, on the most significant purchasing spend in our supply chain in higher risk countries, and on areas where we are most at risk of causing or contributing to modern slavery.

We continue to work with our suppliers to uphold our position on human rights and to comply with regulatory requirements in relation to their employees and workplaces.

Nufarm recognises that identifying and addressing modern slavery risk in our operations and supply chain requires ongoing focus and continuous improvement, and positive collective action. We will endeavour to continue assessing and acting on our commitment to this important issue.



Greg Hunt

Managing Director and Chief Executive Officer, Nufarm

22 March 2024



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Our business

The agricultural industry and Nufarm are evolving to meet global sustainability challenges.

Nufarm is a global company based in Australia. For more than 100 years, we have been helping farmers, locally and globally, meet changing nutrition and energy needs. We are focused on crop protection and seed technology solutions to help our customers meet new global challenges through innovation and technology.

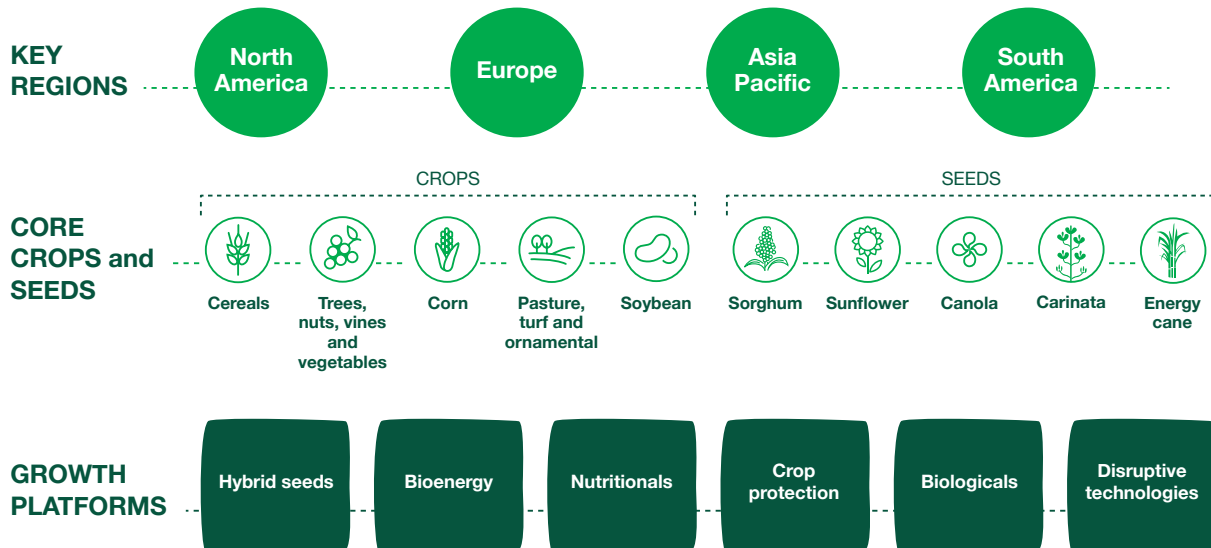
Today, Nufarm takes an integrated approach to crop science innovation. We leverage our unique capabilities across chemistry, production, seeds, digital sciences and alliances to deliver the products our customers depend on, and to unlock new solutions, business models and value chains, and help growers produce more while conserving natural resources.

Across our crop protection and seed technologies platforms, we invest in technologies that deliver innovative solutions to combat weeds, pests and disease, and we deliver new crops, traits and hybrid varieties that generate new sources of value, some of which will serve entirely new markets.

Our group strategy focuses on four key regions (North America, Europe, Asia Pacific and South America)¹ and 10 core crops and seeds where we can provide most value. We carefully selected these based on our portfolio, market position and the potential for growth.

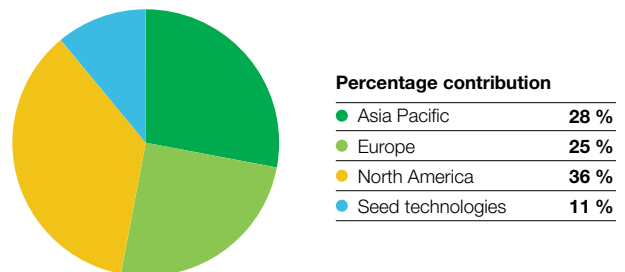
Our platforms also aim to strengthen agricultural sustainability, which to us means reliably producing more affordable food, feed and fuel in ways that support farmer livelihoods and regenerate the environment. As we increasingly steer our business towards innovation, we continue to forge partnerships with agricultural collaborators and world-class innovators. We are thinking bigger and bolder. Nufarm is the first company to develop and commercialise plant-based omega-3 and we have developed and commercialised advanced bioenergy feedstock technology.

Figure 1. Focused on markets, crops and segments where we can provide the most value



We have four revenue-generating operating segments. In FY23, North America was our largest contributor to revenue with 36 per cent, followed by Asia Pacific with 28 per cent and then Europe with 25 per cent. Our seed technologies operating segment, which is global, contributed 11 per cent of revenue in FY23, up from eight per cent in FY22 (Figure 2).

Figure 2. Our FY23 underlying revenue was A\$3,481m



¹ Our major geographic segments are Asia Pacific, which includes Australia, New Zealand and certain parts of Asia; Europe, which includes the United Kingdom, the European Union, and certain other countries in Europe; the Middle East and Africa; North America, which includes the United States of America, Canada and Mexico; and South America, which includes Brazil, Argentina and certain other countries in South America.



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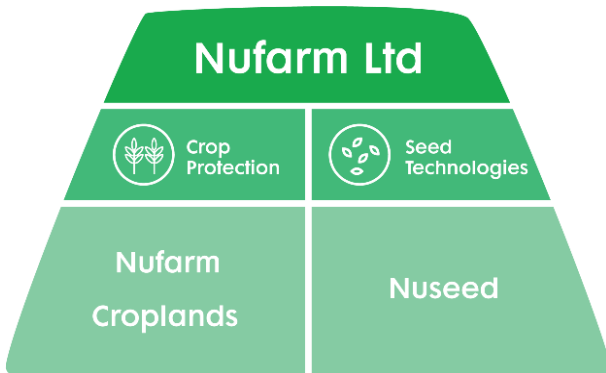
Our engagement with entities covered by this statement

Our business structure

Nufarm Limited is the controlling entity of almost 150 mostly wholly owned companies globally. We largely operate through different companies in crop protection (where the focus is on our core crops and manufacture and supply of crop protection products and equipment) and in seeds (where we breed, grow and sell seeds and plant-based oils). We also have a joint venture in crop protection – Leshan Nong Fu in China – over which we have a joint controlling interest.

The entities covered by this statement can be found in Appendix 1.

Figure 3. Our primary business units and companies



Recognising sustainability progress

Nufarm partners with Ecovadis to help manage sustainability performance and risk of our key current and new crop suppliers. This year Ecovadis assessed Nufarm and awarded us a silver sustainability rating, up from bronze in FY22. Nufarm demonstrated improvement across all four key areas of evaluation: environment, ethics, human rights, and sustainable procurement. The most significant improvement was in sustainable procurement, lifting our score from 40 to 70 out of 100.

The oil from our Nuseed® Carinata seed is a lower-carbon biofuel and a feedstock to the sustainable aviation industry. This important product is certified by the Roundtable on Sustainable Biomaterials (RSB), which includes International Labour Organisation (ILO) aligned standards on human rights and modern slavery.

Figure 4. Our supply chain sustainability ratings and certifications¹

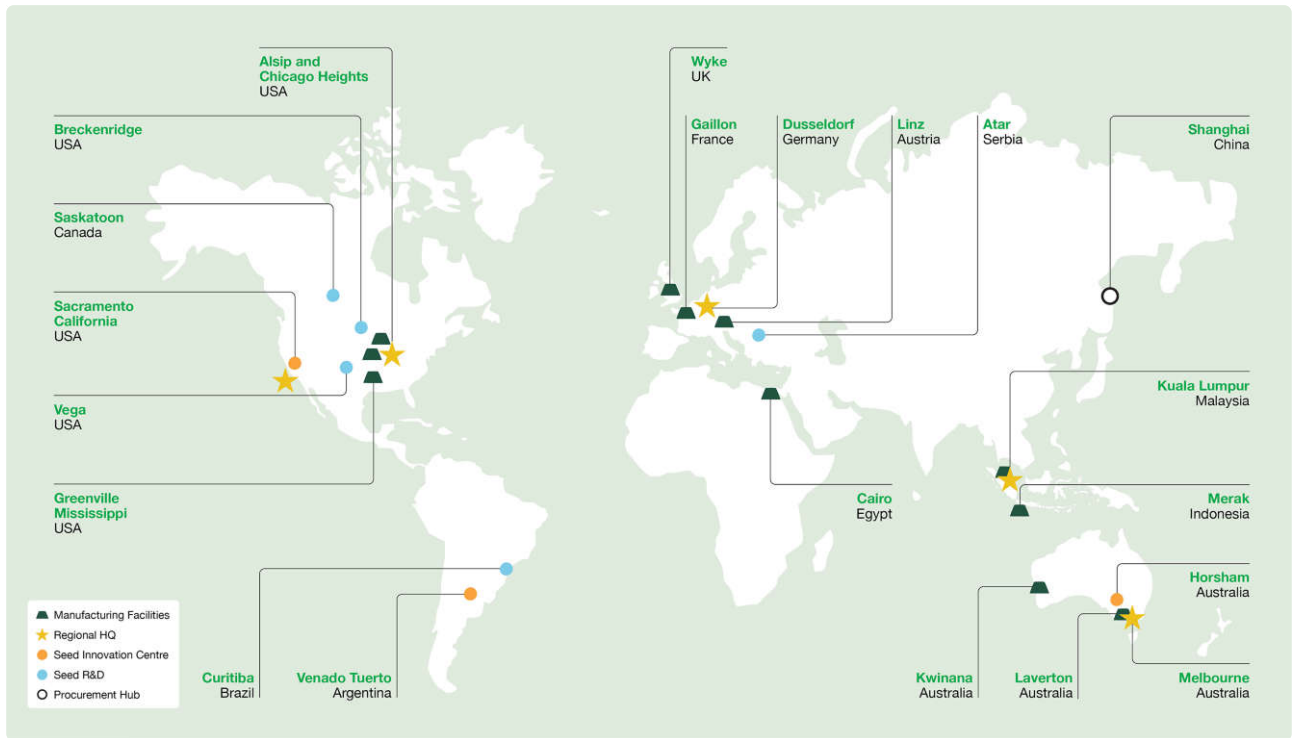


¹ Our Ecovadis rating applies to the Nufarm Group while the RSB certification applies to Nuseed® Carinata only.

Our operations and supply chain

We operate a global manufacturing and distribution platform with an extensive network of local distributors and a strategy to manufacture close to our main customer markets.

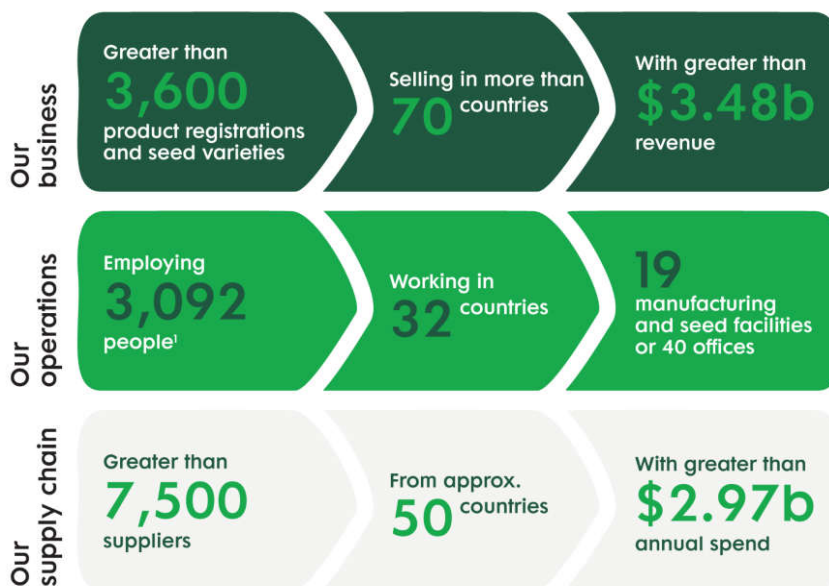
Figure 5. Our key locations



From humble origins in New Zealand over 100 years ago, Nufarm has grown to a global agricultural innovation organisation with 3,092 employees located in 32 countries.¹ Nufarm is now headquartered in Melbourne, Australia.

We exist to grow a better tomorrow through manufacturing or growing innovative crop protection products, equipment and seeds technologies and selling them to our customers. Our customers are primarily agricultural distributors and our consumers are farmers and the plant-based oil industry.

Figure 6. A snapshot of our operations and supply chain in FY23



¹ Measured as head count



Our operations

Nufarm has 11 crop protection manufacturing facilities in eight countries: the United States, the United Kingdom, France, Austria, Egypt, Malaysia, Indonesia and Australia. Our largest facilities are in Australia, Austria, the United Kingdom and North America. In some regions, we also have sales offices independent from our manufacturing locations.

Nufarm synthesises key active ingredients used in crop protection. Using these and other purchased chemicals, we formulate our broad range of herbicides, insecticides and fungicides. Some of our significant crop protection brands are Crucial®, Weedmaster® DST, Glyphosate 450, Terrad'or®², Triflur® X and Estericide® Xtra.

We pack our products into a range of pack sizes to suit on-farm application and sell and distribute our products to our crop protection customers, primarily through third party logistic providers. Our customers are wholesalers of agricultural goods, and our consumers are the farmers who use our products on their fields and crops. We engage professional, engineering and trade service providers to support our business and manufacturing sites.

We also produce canola, carinata, sunflower and sorghum seeds. We develop seeds using our own in-house research and development team and by collaborating with industry and government agencies. We make our products available to growers through local sales, distribution, and retail networks specific to each relevant region in Australia, Europe, North America and Latin America.

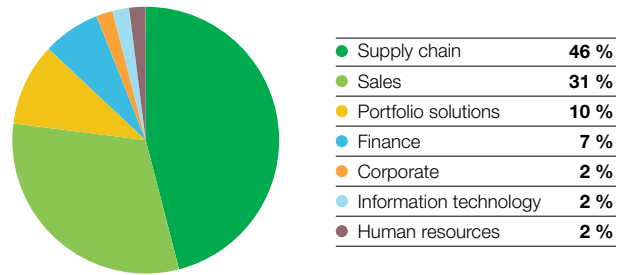
Our bioenergy and nutritional seed products are significant to Nufarm's growth strategy. Nuseed® Carinata is grown to produce biofuel in Argentina, Uruguay and the United States. We currently ship the bulk grain to France to process into oil. We have plans to expand our growing operations into Europe, Brazil and Australia and seek to expand the processing network as well. Nuseed® Omega-3 Canola is grown in South America and processed into Omega-3 oil and sold as a human nutritional supplement, Nutriterra®, and an aquaculture feedstock, Aquaterra®.

Our people

We grew our global team in FY23 and we are now a community of 3,092 people (3,059 full-time equivalent (FTE) employees), up from 2,838 (2,811 FTE employees) in FY22. This net year-on-year increase of 248 roles was predominantly in the supply chain, sales, and portfolio functions and is helping us to implement our business growth strategy. The majority of our people work at our crop protection manufacturing plants, in our sales teams or support the business in product development and administrative functions (Figure 7).

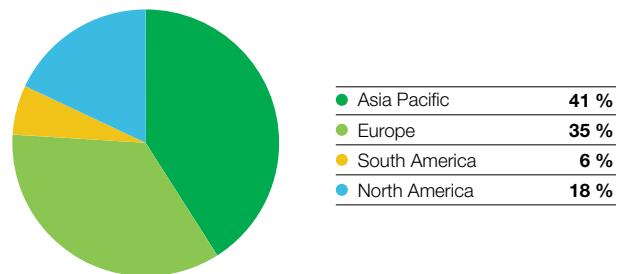
Seventy per cent of our workforce is located in just five countries: Australia, the United States, Indonesia, the United Kingdom and Austria (Figure 8).

Figure 7. Our employee's functional departments¹



¹ Measured as full-time equivalent (FTE) employees

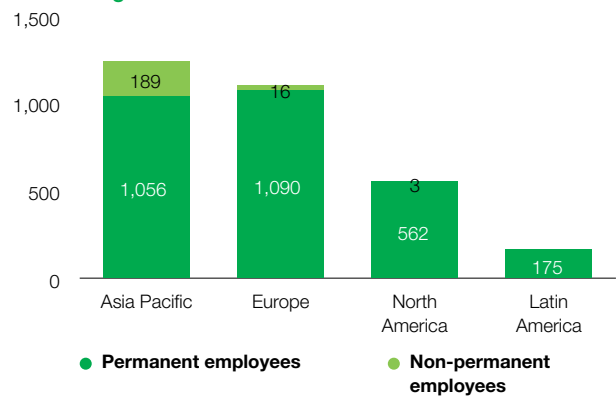
Figure 8. Our employees' locations¹



¹ Measured as full-time equivalent (FTE) employees

In FY23, 93 per cent of our team globally were permanent employees, compared with 89 per cent last year. The remaining 7 per cent were contract or non-permanent employees, down from 11 per cent in FY22 (Figure 9). Refer to the Actions taken this year section, for further information on the work we undertook to provide stable employment for more of our people³.

Figure 9. Employee employment contract by our business regions^{1,2,3}



¹ Measured as head count.

² This information is sourced from our corporate human resources information system and measured as head count. Seasonal temporary workers are not included because this information is not reported in our corporate human resources business system.

³ Our European business region also includes 29 people located in the Middle East and Africa.

² Terrad'or is a registered trademark of Farm Hannong Co. Ltd.

³ Permanent employees are those on employment contracts with no fixed end date, while non-permanent employees are those on fixed term contracts.

Our operations and supply chain continued

We minimise the use of contract labour at our operations, but we employ some casual contract labour through labour hire companies for short periods of time. These people support our crop protection manufacturing activities, carrying out tasks such as labelling and packing during high seasonal demand. In FY23, we estimated this was 6 per cent of our workforce (measured as head count). Due to historical labour shortfalls, we also continue to employ a small number of foreign workers at our manufacturing facility in Port Klang, Malaysia.

Our supply chain

We operate different supply chains for crop protection and seeds technologies. Crop protection comprises the largest portion of our procurement and operational spend (94 per cent) and supply chain complexity, with the majority of materials sourced internationally.

Our tier 1 direct suppliers are those that supply the chemical inputs, packaging materials and finished crop protection

products ready for sale.¹ Our indirect suppliers are those that provide ancillary materials, professional services and outbound logistics to support our business (Figure 10).

Six per cent of our group procurement and operational spending relates to seeds technologies, the majority of which is on the indirect services of growers and seed producing companies who grow our seed, and seed processing operators who clean, treat and pack the seed ready for sale. These tier 1 suppliers primarily engage contract labourers through labour hire companies to help plant and harvest these crops. As a natural product, our seed production has few input materials (mainly crop protection products and packaging materials) (Figure 11).

We work to build long-term relationships with our chemical suppliers and seed production companies to ensure reliable supply that meets our quality standards and corporate values.

Figure 10. Overview of the crop protection supply chain



Figure 11. Overview of the seed technologies supply chain

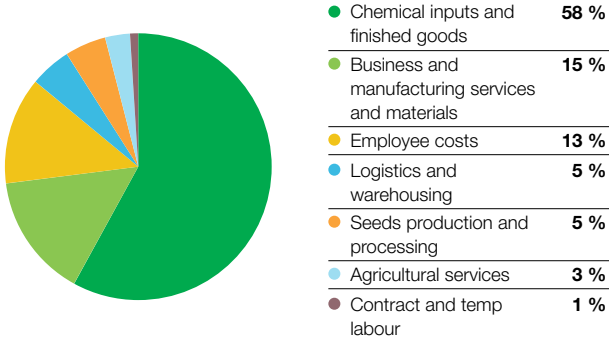


¹ Our tier 1 suppliers are those from whom we directly source materials and services. Our tier 2 suppliers are those that supply our tier 1 suppliers, and tier 3 suppliers are those that supply our tier 2 suppliers and so on.



The chemical inputs and finished goods for crop protection are our most significant purchasing spend category, followed by business and manufacturing services and materials spend at our operations (Figure 12).

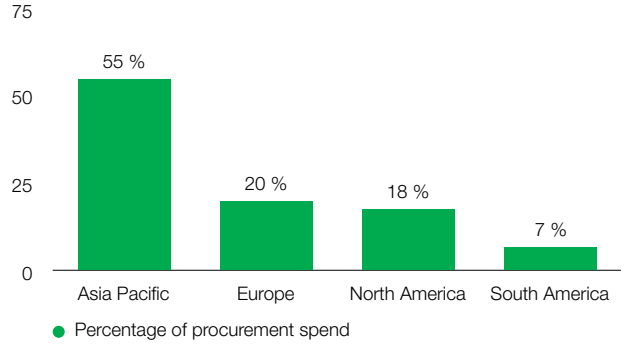
Figure 12. Percentage of purchasing and operational spend per category in FY23¹



¹ Chemical inputs and finished goods includes the inbound logistics costs and import duties and taxes (where applicable).

While we have over 7,500 suppliers spread across almost 50 countries, our direct vendors are our most significant vendor group, comprising 69 per cent of our total purchasing spend in FY23. Over 80 per cent of our materials are sourced from just 10 countries: Australia, Argentina, Belgium, China, Germany, India, Indonesia, South Korea, the United Kingdom and the United States. The proportion of spend per region is shown in Figure 13.

Figure 13. Percentage procurement spend by source region^{1,2}



- ¹ As a global business, one of the challenges we face in modern slavery risk assessment is combining our business information across all of our locations to capture the breadth of our tier 1 suppliers. Our locations operate different business systems with their own unique business rules to capture and classify business data. As a result of this, our source country data for our tier 1 indirect purchases is incomplete.
- ² Includes direct and indirect spend from seeds technologies and direct spend from crop protection but excludes indirect spend from crop protection.



Modern slavery due diligence

Nufarm is committed to ensuring that our policies and practices reflect a high standard of corporate governance. Our approach to modern slavery due diligence is underpinned by our commitment to be a responsible business and to partner with organisations that share these values. The oversight of modern slavery is embedded in our governance framework and the policies and procedures we use in our daily operations. These procedure seek to identify and mitigate modern slavery risk.¹

Modern slavery governance

The board considers that Nufarm's governance framework and adherence to that framework are fundamental to demonstrating accountability to shareholders and appropriate oversight of the management of risk and promoting a culture of ethical, lawful and responsible behaviour within Nufarm. Our modern slavery governance structure and the relevant modern slavery responsibilities of the Nufarm management team are set out in Figure 14.

Figure 14. Our modern slavery governance structure



¹ Organisation for Economic Co-operation and Development. (2018). OECD due diligence guidance for responsible business conduct. OECD



Responsible business conduct

Nufarm's code of conduct applies to all directors, employees, contractors, agents and representatives.

The key values underpinning the code of conduct are:

- Actions must be governed by the highest standards of integrity and fairness.
- All decisions must be made in accordance with the spirit and letter of applicable law.
- business must be conducted honestly and ethically, with skill and the best judgement, and for the benefit of customers, employees, investors and Nufarm alike.

Our code of conduct outlines the expectations that guide our employees' daily actions. It requires Nufarm to promote

high standards of integrity by conducting our affairs honestly, ethically and responsibly. We emphasise care and respect for colleagues, partners, suppliers, the environment and the communities where we operate. Bribery and corruption are prohibited in all parts of our business. Material breaches of the code of conduct are reported to the board audit and risk committee.

In October and November 2023, we delivered a training program in multiple languages for our code of conduct and speak up (whistleblower) policy. All active employees were required to complete this program by the end of 2023. In early FY24, 98 per cent of those employees, and all board members, had completed the training.

Our policies

We have policies and procedures that embody Nufarm's values and set out our expectations of employee and supplier behaviour and standards. These help to embed modern slavery risk management into our business practices. We have reviewed the majority of these policies within the last two to three years and aim to undertake periodic reviews of them going forward.

Table 1. Summary of relevant corporate codes and policies

Policy ¹	Approved by	Approval date
Code of conduct	Chief Executive Officer	November 2020
Human rights policy	Board of directors	July 2021
Health safety and environment policy	Chief Executive Officer	October 2023
Inclusion and diversity policy	Group Executive People and Performance	November 2022
Supplier code of conduct	Global Strategic Procurement Manager	July 2022
Speak up (whistleblower) policy	Board of directors	June 2022

¹ Go to nufarm.com or click on the policy titles in this table to access these policies.

Respecting human rights

Nufarm is committed to providing a work environment where human rights are respected and upheld. We expect the same from all parties with whom we do business. We believe that respecting human rights in all we do is integral to the sustainability and success of our business because employees and communities who act with integrity contribute to a more stable and profitable business.

Our human rights policy sets out our expectations of employees, officers, contractors, distributors and suppliers in upholding our human rights obligations and responsibilities in our business, supply chain and the communities in which we operate, consistent with the United Nations' Universal Declaration of Human Rights.

We respect the rights and freedom of our employees to join or not join organisations of their choosing, to associate freely and bargain collectively and to do so free from any discrimination or harassment. Where we operate in countries that restrict these rights by law, we facilitate open communication and engagement between workers and management.

Nufarm considers slavery and trafficking in persons and child labour to be very serious issues. Our human rights policy establishes our commitment to workplaces free from harassment, violence or threats of violence, in keeping with our goal of zero harm to our employees.

Worker and community health and safety

Our updated health, safety and environment policy (HSE) reflects our belief that HSE extends beyond our employees to

our customers and communities. It is expressed to apply to all Nufarm directors, employees (permanent and non-permanent), and visitors to our facilities.

The policy emphasises our commitment to creating a safe working environment, promoting HSE leadership and awareness, and continuously improving our HSE management systems. We encourage open communication on HSE matters and make sure that everyone is aware of their HSE responsibilities, from the CEO to the newest employee.

Protecting our employees from harm is one of a number of factors that contribute to providing decent work. While exposing employees to a hazardous workplace is not a form of modern slavery, it is illegal and can be an indicator of poor labour or slavery-like practices.²

Our inclusion and diversity commitment

Nufarm promotes a culture of inclusion, diversity and equity, fostering workplaces free from discriminatory activities and practices. We work towards providing an inclusive work environment where individuals are valued for their diversity, can bring their whole self to work and be empowered to reach their full potential. Nufarm's policy is to take all reasonable measures to ensure equal opportunity for all employees, making merit-based decisions on employment matters at all of our locations around the world.

Women and girls are disproportionately affected by modern slavery, and we recognise we have a role to play in helping to break down the systemic gender inequalities that exist in society and contribute to making women more vulnerable to

² Attorney-General's Department. (2023) Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities May 2023. Commonwealth of Australia.

Modern slavery due diligence continued

exploitation. We actively work to progress gender diversity and in FY23 we achieved 35 per cent female representation in our senior leadership team and increased the representation of women in our overall workforce by 1 per cent, to 29 per cent.

To continue advancing a more diverse workplace, we set a new target in FY22 to have 40:40:20 representation by 2030 for our senior leadership team (CEO-1 and CEO-2): 40 per cent who identify as female, 40 per cent who identify as male, and 20 per cent who identify as male, female or other.

Supplier conduct

Our global supplier code of conduct prohibits our suppliers from engaging in any form of modern slavery. The code also extends our broader position on human rights to our suppliers. We require all our suppliers to comply with regulatory requirements in relation to employees and workplaces and in particular to:

- provide workplaces free of harassment and discrimination
- treat their employees fairly and abide by all local labour laws regarding minimum pays, working hours, benefits etc.
- provide a safe and healthy workplace, with processes to identify and manage risks, investigate injuries, and implement effective preventative actions
- provide employees basic necessities, such as potable drinking water, adequate restrooms, first aid and fire suppression equipment
- provide employees with the appropriate safety equipment required for each job function
- comply with national laws and the International Labour Organization's standards on workers' age.

Raising concerns

Nufarm has a speak up (whistleblower) policy that outlines how employees, contractors and other external stakeholders can report unethical, unlawful or irresponsible behaviour without fear of intimidation or recrimination. Our speak up policy is designed to be accessible and inclusive, with multilingual support. We provide the means for individuals to come forward and, if they wish, to anonymously express their concerns about suspected misconduct or any actions that seem unethical, illegal or simply out of place with our values.

Our speak up policy is supported by our independently operated integrity helpline and is a mechanism for reporting and investigating grievances, including those that are human rights related.

Reported cases are referred to the Global General Counsel and Company Secretary and the Group Executive People and Performance as appropriate to the nature of the issue. Investigations are conducted fairly, independently and in strict confidence. The audit and risk committee oversees the application of the speak up policy, including review of reporting trends.



Our policies are implemented through our due diligence procedures which seek to identify and mitigate modern slavery risk within our operations and supply chain.

Our risk framework

Our group risk framework, policies and procedures align to the concepts and principles identified in the Australia/New Zealand standard on Risk Management (AS/NZ ISO 31000:201809). They set out the roles, responsibilities and guidelines for managing financial and non-financial risks associated with Nufarm's business and were designed to provide effective management of material risks at a level appropriate to Nufarm's global business. We continue to enhance them as the Nufarm Group's operations develop and range of activities expands. These risks include contemporary and emerging risks such as cybersecurity, post-COVID impacts, privacy and data breaches, increased geopolitical risk, sustainability and climate change.

Nufarm's key risks are summarised on pages 26-30 of our FY23 annual report. While we have identified a compliance breach of one or more of the many regulatory obligations, including our sustainability obligations, under which we operate as a key business risk, we have not specifically identified modern slavery risk as a key business risk. As a result, identifying and managing modern slavery risk is done at a functional level within the business.

In FY24 we will be refreshing our sustainability materiality study and during this process we will assess the materiality of human rights risks, including modern slavery.

Concerned? Speak up

Nufarm is committed to fair, ethical and professional business practices and an inclusive, safe workplace for all. If you have a concern about unethical, illegal or unsafe activity, please do not keep it to yourself. Contact our [Integrity helpline](#).



Our approach to modern slavery risk identification

To identify modern slavery risk in our operations and supply chain, we examine the following modern slavery risk factors:

- whether the countries in which we work and source materials from are more vulnerable to modern slavery practices
- whether the supplier industries we are purchasing materials from are known to have modern slavery risks within them or their supply chain
- whether the commodities used by our suppliers in our supply chain are known to have modern slavery risks in their supply chain, and
- the ways in which we engage people to work within our organisation.

These risk factors may expose Nufarm’s operations and supply chain to the risk of modern slavery practices, (Table 2).

Table 2. Modern slavery risk factors

Country vulnerability	<p>Some countries in which we operate have been identified as being more vulnerable to modern slavery practices due to country-specific weaknesses. These weaknesses include governance issues, lack of basic needs, inequality, disenfranchised groups and effects of conflict. We use the country vulnerability index from the Walk Free Foundation’s Global Slavery Index (2023), to identify locations where country vulnerability contributes to their modern slavery risk.¹</p> <p>Country vulnerability is a scale, rather than a simple high, medium or low ranking. We recognise that Egypt, Mexico, South Africa and Türkiye are some of the countries in which we operate that are more vulnerable to modern slavery as a result of country-specific weaknesses. To a lesser degree, Indonesia, Ukraine, Brazil, China and Vietnam also have some vulnerability to modern slavery practices.^{1,2}</p> <p>We also recognise that our suppliers in Philippines, Mexico, India and South Africa are located in countries that have been identified by the Global Slavery Index as being more vulnerable to modern slavery practices. To a lesser degree, Indonesia, Brazil, Thailand and China also have some vulnerability to modern slavery practices.^{1,2}</p>
Industry	<p>Modern slavery is more prevalent in certain industries, such as the textile and garment industry.¹ Either by itself or combined with an at-risk source country, this industry can contribute to modern slavery risk. Some of the industries from which we source materials or services, such as agricultural and logistics services, have been found to have modern slavery practices occurring within them.^{3,4}</p> <p>The majority of our suppliers are chemical manufacturers and modern slavery is not reported to be highly prevalent in this industry; however, there is some potential for it to enter deeper in the supply chain, through some of the raw materials or commodity inputs to our suppliers’ manufacturing process.^{1,2,5}</p>
Commodities	<p>Specific products or commodities are at risk of modern slavery practices when sourced from high-risk countries. For example, we purchase finished products containing copper, and solvents and surfactants derived from palm oil.⁵ While we do not directly source these items, they are used in our supply chain to manufacture the products that we purchase.</p>
Employment arrangements	<p>Employment conditions, such as temporary or uncertain employment arrangements or visa status, can make people more vulnerable to exploitation, particularly workers in higher risk countries working in low-skilled roles. This can be exacerbated for people with limited education, local knowledge or language.⁶</p>

1 Walk Free Foundation. (2023). The global slavery index 2023. Walk Free Foundation.
 2 Office to Monitor and Combat Trafficking in Persons. (2022). 2022 trafficking in persons report. United States Department of State, Washington, DC.
 3 International Labour Organization, Walk Free Foundation and International Organization for Migration. (2022). Global estimates of modern slavery forced labour and forced marriage. ILO.
 4 Caskey, C., O’Sullivan, N. and Pickette, R. (2022). Modern slavery within maritime shipping supply chains: guidance for Australian businesses in identifying, managing, and mitigating modern slavery risks within maritime shipping. Global Compact Network Australia & Maritime Union of Australia.
 5 Bureau of International Labor Affairs. (2022). List of goods produced by child labour or forced labour. United States Department of Labor.
 6 Gangmasters and Labour Abuse Authority. (2023). Modern slavery. GLAA.

In identifying risk factors and evaluating our risks, we have consulted sources such as the International Labour Organization (ILO), US Customs and Border Protections, US Department of Labour, Australian Government – Australian Institute of Criminology (AIC), Australian Border Force, UK Government’s Gangmasters and Labour Abuse Authority, the Walk Free Foundation, Verité, Anti-slavery International, International Finance Corporation, Responsible Sourcing Tool and various other non-government organisations and public media sources.

Modern slavery due diligence continued

Risk identification and management procedures

Taking these risk factors into consideration, we identify and review our risks and implement improvement actions, prioritising the areas of highest spending in our supply chain and operations where:

- Nufarm's activities may cause the modern slavery risk, or
- Nufarm's activities directly link or contribute to the modern slavery risk and Nufarm has a high influence over the risk.

We take our existing control measures into consideration when assessing the risk and developing action plans.

Modern slavery risk management in our operations

Recruiting and engaging workers

We have due diligence processes and controls in place that endeavour to prevent modern slavery from entering our business. We provide standard employment contracts in the local language to ensure we fully inform our employees of their legal labour rights and working conditions when first engaged so they can make an informed decision to work for us. We comply with local jurisdictional employment obligations. We pay our employees at least a minimum wage, pay all legal entitlements on a regular basis, and compensate employees monetarily.

Where we use third party labour hire, we require those organisations to comply with the local regulations, employment standards and awards through the contractual terms of their engagement.

Engaging service providers

We communicate our global supplier code of conduct to all suppliers of temporary labour and service providers in at-risk industries, such as cleaning.¹ Raising suppliers' awareness of our human rights standards is a first step towards minimising risk to their workers.

We limit our use of contract and casual labour, endeavouring to provide stable, permanent employment where we can.

Employing foreign workers

We employ foreign workers in Malaysia only. Our policy is to apply the same employment terms and conditions, such as annual leave entitlements, annual salary review, promotion opportunities etc., to our foreign workers as we do to our permanent employees. We periodically review employment conditions to ensure equity between our local and foreign workers.

We support the annual visa renewal process for our foreign workers, subject to the employee wishing to continue employment with Nufarm and government approval. If an employee chooses to cease employment and return home, Nufarm repatriates the employee, paying for and organising their return flight.

Self-assessing our operations

We self-assess our locations, including our joint venture Leshan Nong Fu in China, to help us better understand and plan steps to improve the controls we have in place to

prevent modern slavery entering our organisation through our employment processes.

Supporting our employees in challenging times

Nufarm recognises that our people are central to our success. We aim to create a culture that encourages all of our people to be safe, stay curious, own their growth, and come as they are. We believe these are the attributes that will help us to deliver on our ambition to be a global agricultural innovator.

Sometimes our employees are exposed to challenging situations outside of their control and, where we can, we take steps to help them out.

The war in Ukraine increases the Ukrainians' vulnerability to human trafficking. The millions of displaced people and refugees are especially vulnerable to forced labour or to being forcibly removed from Ukraine and trafficked.² Nufarm continued to employ and support its people who chose to remain in Ukraine this year (we have 22 people working in the country). We help to address wellbeing concerns where we can, and this year we provided shipments of essential supplies, such as gas heaters, generators, battery packs, and food hampers. Providing security of employment and basic living essentials helps to make our people and their families less vulnerable to exploitation.

Providing modern slavery training

We provide modern slavery awareness training to our procurement teams, and our human resources team members who are responsible for our operations in countries with a higher vulnerability to modern slavery. This aims to increase the awareness of modern slavery risks and the control measures in place to mitigate these risk.

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Employee satisfaction^{3,4}

This score tells us our employees are happy to work at Nufarm, and the score remains in the top quartile benchmark in the GLINT⁵ database (2023:77).

¹ Cleaning Accountability Framework Ltd. (2023). Modern slavery in cleaning supply chains. CAF.

² Office to Monitor and Combat Trafficking in Persons. (2022). 2022 trafficking in persons report. United States Department of State, Washington, DC.

³ Nufarm Voice is our employee engagement platform. We use it to facilitate continuous listening through regular, anonymous surveys. This year we conducted three employee surveys.

⁴ Measured as 78 out of 100

⁵ We have partnered with GLINT to facilitate our employee engagement surveys. We benchmark ourselves against GLINT's 900-strong customer base.



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Procurement procedures and processes

We have a global procurement management system in place which includes the policies and procedures by which our global procurement teams operate.

New suppliers

Within our crop protection business we have a new supplier evaluation process with a supplier risk assessment that evaluates our modern slavery risk factors in addition to other sustainability considerations, such as environmental risk. If a supplier is identified as high risk, our procurement team examines the underlying risk factors and prepares strategies to mitigate the risk.

We work to build long-term relationships with our direct suppliers and there is not a significant turnover in our major supplier base. Crop protection suppliers are asked to comply with our global supplier code of conduct and are typically subject to an ongoing evaluation process. We communicate our code to our direct suppliers when commencing a relationship with them.

Supplier contracts - clauses

Our crop protection supplier contracts include a definition of modern slavery and a clause requiring the supplier to comply with applicable modern slavery laws.

Our key seed producers and processors are formally advised of and committed to conducting business in a manner consistent with our corporate social responsibility policies, including our global supplier code of conduct and human rights policy.

Supplier assessment

We have a supplier corporate social responsibility (CSR) assessment program to target our direct suppliers of chemical inputs for manufacturing and packaging materials.

We partner with Ecovadis, a global leader in this field, to support us in this activity. Our supplier CSR assessments cover a comprehensive range of environmental, corporate governance and human rights topics, including modern slavery. EcoVadis undertakes an independent assessment of our suppliers' policies, actions and outcomes, providing us with insight into our suppliers' potential risks and impacts.

While this program is broader than modern slavery, modern slavery is an important element of the assessment. We use a risk-based approach to determine which suppliers need to undergo CSR assessment. Our risk assessment considers a range of factors, including the supplier's country of operation and industry. Direct suppliers with higher CSR risk were given high priority for CSR assessment.

Supplier audits

Rather than immediately terminate a relationship with a supplier who falls short of our CSR assessment hurdle, our global supply team directly engages with and conducts on-site audits to help them better understand and improve their CSR performance. We may continue to maintain the relationship if these issues can be addressed. This activity is focused on China, where we have the most significant spend in a country that is more vulnerable to modern slavery practices.

Monitoring our supply chains

We use supply chain risk management applications, Sphera and Ecovadis, to monitor our supply chain. Both systems provide notifications of potential incidents of modern slavery that may be linked to our suppliers. Such alerts are promptly investigated.

Remediation

Modern slavery has the potential to cause its victim physical, physiological and/or financial harm and, if we were to identify an instance of modern slavery in our supply chain, we recognise the need to remedy the situation.

We have several mechanisms that should alert us to an incident or suspected incident of modern slavery in our operations or supply chain:

- direct escalation through our management personnel
- our integrity (speak up) helpline
- our CSR assessment program
- our in-person supplier audits
- our risk alert systems, Sphera and Ecovadis.

Such a matter would be brought to the attention of the responsible Nufarm executive and appropriate advice obtained on how to proceed. The nature of modern slavery and our relationship to it (i.e. cause, contributor or directly linked) means any incident of modern slavery would be unique and require a tailored remediation approach.

We have not identified any instances of modern slavery in our supply chain this year.

Balancing sustainability in our palm oil derivative supply chain

Two important ingredients of crop protection products are solvents and surfactants. The solvent is used to dissolve the active ingredient and the surfactant helps the active ingredient be absorbed by that plant or pest, improving efficacy of the product.

We purchase solvents and surfactants to formulate our products. Traditionally these materials are derived from non-renewable petroleum-based chemicals. One of the ways we are able to reduce our dependence on non-renewable materials is transitioning to renewable,¹ plant-based derived raw materials, where suitable, effective and economical alternatives exist.

Oil derived from palm kernels has the right short-chain fatty acids and alcohols needed to produce the surfactants and solvents we use, and it produces these more efficiently than other plant-based oil crops, such as rapeseed or sunflower seed.¹ This means it requires less land to produce the same amount of oil.

When formulated into crop protection products, the palm oil solvents may have better health safety and environmental² outcomes in manufacturing and use, however, their use introduces new sustainability risks, one of which is the risk of labour and human rights issues at palm oil plantations and milling and refining.³

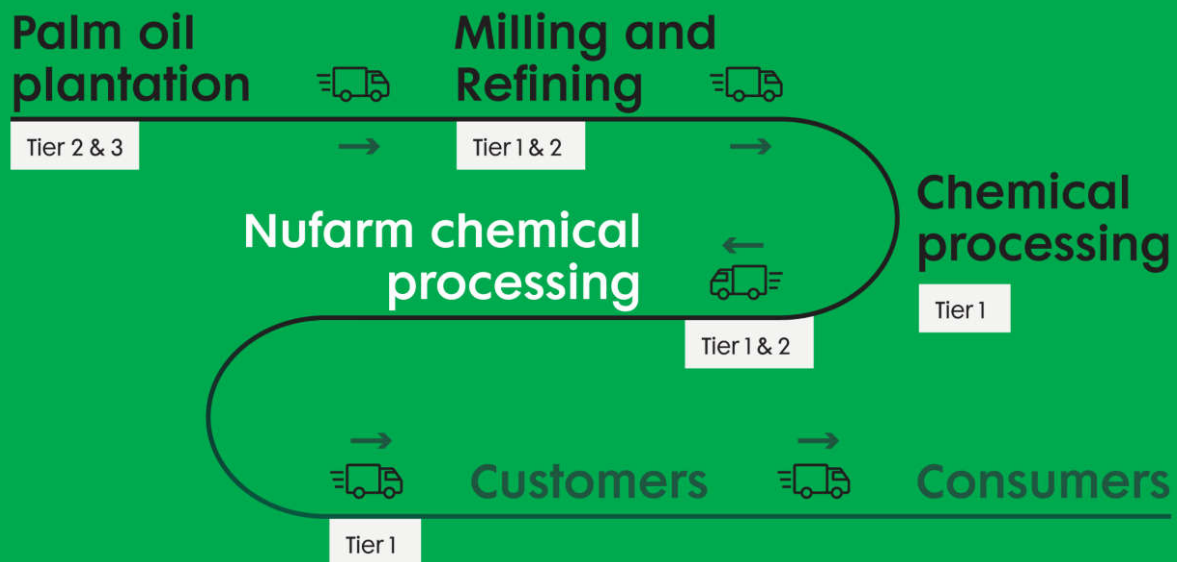
We are directly linked to this risk through our tier 2 and 3 suppliers⁴ (Figure 15). While we have a limited ability to directly influence the conditions in which palm oil is grown and produced, we can reduce the modern slavery risk through the suppliers we choose to work with.

Our suppliers of palm oil derived surfactants and solvents all participate in our sustainable sourcing program and are among our highest ranked suppliers in Ecovadis, holding Gold or Platinum ratings. In addition, they all hold Roundtable on Sustainable Palm Oil (RSPO) supply chain certifications. RSPO is a global organisation made up of 4,000 palm oil producers, buyers and environmental and social organisations.^{1,3}

This certification is verified by an annual, third party audit to RSPO's standards, and certifies that our suppliers are sourcing RSPO Certified Sustainable Palm Oil. RSPO Certified Sustainable Palm Oil is a certification obtained by growers and processors of palm oil and sets a range of environmental, social and economic standards for their industries. These standards include respecting worker's rights, conditions and human rights.

We only work with suppliers with RSPO certification.⁵ Through this we are able to minimise sustainability and modern slavery risk in this supply chain.

Figure 15. Simple supply chain for our palm oil derived materials⁶



¹ Thomas, M., Buchanan, J., McLaughlin, D. & Grubba, D., (2015), Sustainable sourcing guide for palm oil users, WWF & Conservation International.
² Nanda, B., Sailu, M., Priyaranjan, P., Ranjan, R. & Nanda, B. (2021). Green solvents: a suitable alternative for sustainable chemistry. Science Direct, 47(5).
³ Bureau of International Labor Affairs. (2022). List of goods produced by child labour or forced labour. United States Department of Labor.
⁴ We have multiple suppliers who have different levels of forward and backwards integration in their supply chains which influences whether the suppliers are our tier 2 or 3 suppliers.
⁵ While Nufarm only purchases palm oil derived surfactants and solvents from RSPO certified suppliers, it does not specifically purchase RSPO certified surfactants and solvents.
⁶ Our tier 1 suppliers are those from whom we directly source materials and services. Our tier 2 suppliers are those that supply our tier 1 suppliers, and our tier 3 suppliers are those that supply our tier 2 suppliers, and so on.

Modern slavery risks in our operations and supply chain

We have prioritised eight areas of operational and supply chain spending in this statement which have some exposure to modern slavery risk (Table 3).

Table 3. Modern slavery risks identified in our operations and supply chain

Occurs in	Risk #	Description of risk and examples of how modern slavery could potentially enter our supply chain ^{1,2,3}	Impacted operations or source countries	Modern slavery risk factors ^{2,4}	Relevant types of modern slavery	Our relationship to the risk	Nufarm's ability to influence the risk
Our operations	1	<p>Contracting low-skilled labour in our operations to meet seasonal demand through labour hire companies or as service providers in at-risk industries, such as cleaning. The risk of modern slavery occurs in our Tier 1 suppliers:</p> <ul style="list-style-type: none"> We estimate 6 per cent or approximately 186 people were employed as temporary seasonal workers.⁵ We have identified approximately 70 service providers that fall into the category of being an at-risk industry. <p><i>Example of how modern slavery could potentially enter our supply chain: A temporary worker from a labour hire company or a cleaning company worker contracted to work at one of our locations could potentially become a victim of modern slavery if they did not have a legal work visa, their employer had taken their passport and they were working under threat of exposure to authorities.</i></p>	Australia, New Zealand, Malaysia, Indonesia, China, North America, Canada, United Kingdom, Ireland, Austria, France, Germany, Poland, Romania, Hungary, Spain, Italy, Portugal, Belgium, Netherlands and Mexico	Employment arrangements: uncertain employment or visa status or limited local language or knowledge	Forced labour and debt bondage	Contribute to	Medium
	2	<p>Employing foreign workers in our crop protection manufacturing plant in Malaysia. In FY23 we employed 24 people from Nepal and Indonesia. Foreign workers are engaged through a third party labour hire company. The risk of modern slavery occurs in our tier 1 or 2 suppliers.</p> <p><i>Example of how modern slavery could potentially enter our supply chain: A foreign worker could potentially be a victim of modern slavery if they were forced to take employment through threat of violence or if they were required to pay a bond that they are unable to repay, to secure employment by our contracted labour hire company or their local agent in Nepal or Indonesia.</i></p>	Malaysia	<p>Country vulnerability: inequality or lack of basic need</p> <p>Employment arrangements: limited local language or knowledge</p>	Forced labour and debt bondage	Contribute to	High
	3	<p>Operating in countries more vulnerable to modern slavery practices. In FY23 we employed 661 people (21 per cent) in these regions of the world:</p> <ul style="list-style-type: none"> 172 people are on non-permanent contracts in Indonesia. 22 of these people are employed in Ukraine which is a current conflict zone. <p>We recognise that there are two components to this risk: both the risk of modern slavery entering our operations through weaknesses in our internal controls and the risk to the wellbeing of our own employees who may be living and working in situations that could leave them more vulnerable to exploitation.⁶</p> <p><i>Example of how modern slavery could potentially enter our supply chain: An employee working legally for Nufarm could potentially be under threat or coercion from a third party who has control of the employee's income and bank account.</i></p>	<p>Egypt, Mexico, South Africa and Türkiye</p> <p>Indonesia, Ukraine, Brazil, China and Vietnam</p>	<p>Country vulnerability: inequality, lack of basic needs, effects of conflict or disenfranchised groups</p> <p>Employment arrangements: uncertain employment</p>	Forced labour and debt bondage	Caused by	High



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Occurs in	Risk #	Description of risk and examples of how modern slavery could potentially enter our supply chain ^{1,2,3}	Impacted operations or source countries	Modern slavery risk factors ^{2,4}	Relevant types of modern slavery	Our relationship to the risk	Nufarm's ability to influence the risk
Our supply chain	4	<p>Materials purchased from suppliers operating in countries more vulnerable to modern slavery practices. Refer to Figure 16 for a map of the locations from where we source materials and their associated vulnerability. This risk occurs in our ≥ tier 1 suppliers.</p> <p><i>Example of how modern slavery could potentially enter our supply chain: An international supplier could potentially be sourcing chemicals through an intermediary and the original manufacturer of the chemicals is using forced labour in their factory.</i></p>	<p>Philippines, Mexico, India and South Africa</p> <p>Indonesia, Brazil, Thailand and China</p>	Country vulnerability: governance issues, inequality, lack of basic needs, effects of conflict or disenfranchised groups	Forced labour and debt bondage	Directly linked to	Medium
	5	<p>Engaging agricultural service providers and seed producers who in turn use contract labour on their farms. These suppliers represent approximately 3 per cent of our FY23 procurement spend. Modern slavery risk occurs in tiers 2 and 3 of our supply chain, depending on the farm labour arrangements.</p> <p><i>Example of how modern slavery could potentially enter our supply chain: A migrant worker could potentially be engaged by a labour hire company to work on a farm that was contracted to grow our seed. The farm may be remote, the worker may not have private transportation, and their passport may have been confiscated, leaving the worker with no means of leaving their employment.</i></p>	Türkiye	Country vulnerability: effects of conflict	Forced and child labour	Directly linked to	Medium
	6	<p>Purchasing raw materials and finished products that contain copper. Copper-based products are used as fungicides in our crop protection business. These products represent approximately 1 per cent of our total procurement spend. We source most of these products from Chile, which has a lower vulnerability to modern slavery, but there is a potential some of the copper to be sourced from more vulnerable African countries. Modern slavery risk occurs in ≥ tier 3 suppliers in our supply chain.</p> <p><i>Example of how modern slavery could potentially enter our supply chain: An African mining company may use debt bondage to force workers to extract copper from illegal artisanal mines. The extracted ore is consolidated and processed with legally extracted material, entering the copper supply chain. There is a potential that once processed, this material is purchased by one of our suppliers and formulated into a finished goods that we purchase.^{1,7}</i></p>	Chile and other sources still to be identified.	<p>Country vulnerability: Governance issues, inequality, lack of basic needs and effects of conflict</p> <p>Commodity vulnerability</p>	Forced labour, debt bondage, child labour	Directly linked to	Medium
	7 ^{8,9}	<p>Purchasing solvents and surfactants that have been derived from palm oil. Modern slavery risk occurs in tiers 2 and 3 of our supply chain. We estimate that the palm oil derived chemicals we purchase represent approximately 1 per cent of our total procurement spend.</p> <p><i>Example of how modern slavery could potentially enter our supply chain: A migrant worker may be recruited by labour hire companies and given work on a palm plantation on a remote island. At the plantation, the worker may be subjected to physical violence and compelled to work in poor and dangerous conditions for excessive hours. The fruit harvested under these conditions could be sold on to a processor for extraction and refining; the palm oil may then be sold on to one of our suppliers who manufactures it into a solvent or surfactant which we purchase and formulate into one of our products.^{7,10}</i></p>	Indonesia and Malaysia	<p>Country vulnerability: governance issues, inequality and lack of basic needs</p> <p>Commodity vulnerability</p>	Forced labour, debt bondage, child labour, human trafficking	Directly linked to	Very low



Occurs in	Risk #	Description of risk and examples of how modern slavery could potentially enter our supply chain ^{1,2,3}	Impacted operations or source countries	Modern slavery risk factors ^{2,4}	Relevant types of modern slavery	Our relationship to the risk	Nufarm's ability to influence the risk
	8	<p>We use third party shipping to bring raw materials to our sites. Modern slavery and human rights abuses have been found in these industries. Logistics and warehousing spend combined represents approximately 6 per cent of our total procurement spend. Modern slavery risk occurs in \geq tier 1 logistics suppliers.</p> <p><i>Example of how modern slavery could potentially enter our supply chain: Seafarers on ships carrying our materials could potentially have had their wages withheld and be required to stay on the ship for excessive and illegal lengths of time, not being able to leave the ship to take shore leave or be repatriated to their home countries.¹¹</i></p>	We use international shipping across most of our business.	Employment arrangements: uncertain employment	Forced labour and debt bondage	Directly linked to	Low

- 1 Office to Monitor and Combat Trafficking in Persons. (2022). 2022 trafficking in persons report. United States Department of State, Washington, DC.
- 2 Walk Free Foundation. (2023). The global slavery index 2023. Walk Free Foundation.
- 3 Our tier 1 suppliers are those from whom we directly source materials and services. Our tier 2 suppliers are those that supply our tier 1 suppliers, and our tier 3 suppliers are those that supply our tier 2 suppliers, and so on.
- 4 These risk factors occur in the countries listed, but not every risk factor is applicable to each country.
- 5 Measured as head count in FY23
- 6 Nufarm does not cause or contribute to the potential wellbeing risks of our people living and working in countries more vulnerable to exploitative practices where those risks are inherent in the location.
- 7 Bureau of International Labor Affairs. (2022). List of goods produced by child labour or forced labour. United States Department of Labor.
- 8 Responsible Sourcing Tool. (2023). Visualize risk. Responsible Sourcing Tool.<https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods/supply-chains/palm-oil>
- 9 International Labour Organization. (2022). Advancing workers' rights in Indonesia and Malaysia's palm oil sector. ILO.
- 10 Bureau of International Affairs. (2024). Department of Labour's Exposing exploitation in global supply chain series. US Department of Labour.
- 11 Caskey, C., O'Sullivan, N. & Pickette, R. (2022). Modern slavery within maritime shipping supply chains: guidance for Australian businesses in identifying, managing, and mitigating modern slavery risks within maritime shipping. Global Compact Network Australia & Maritime Union of Australia.

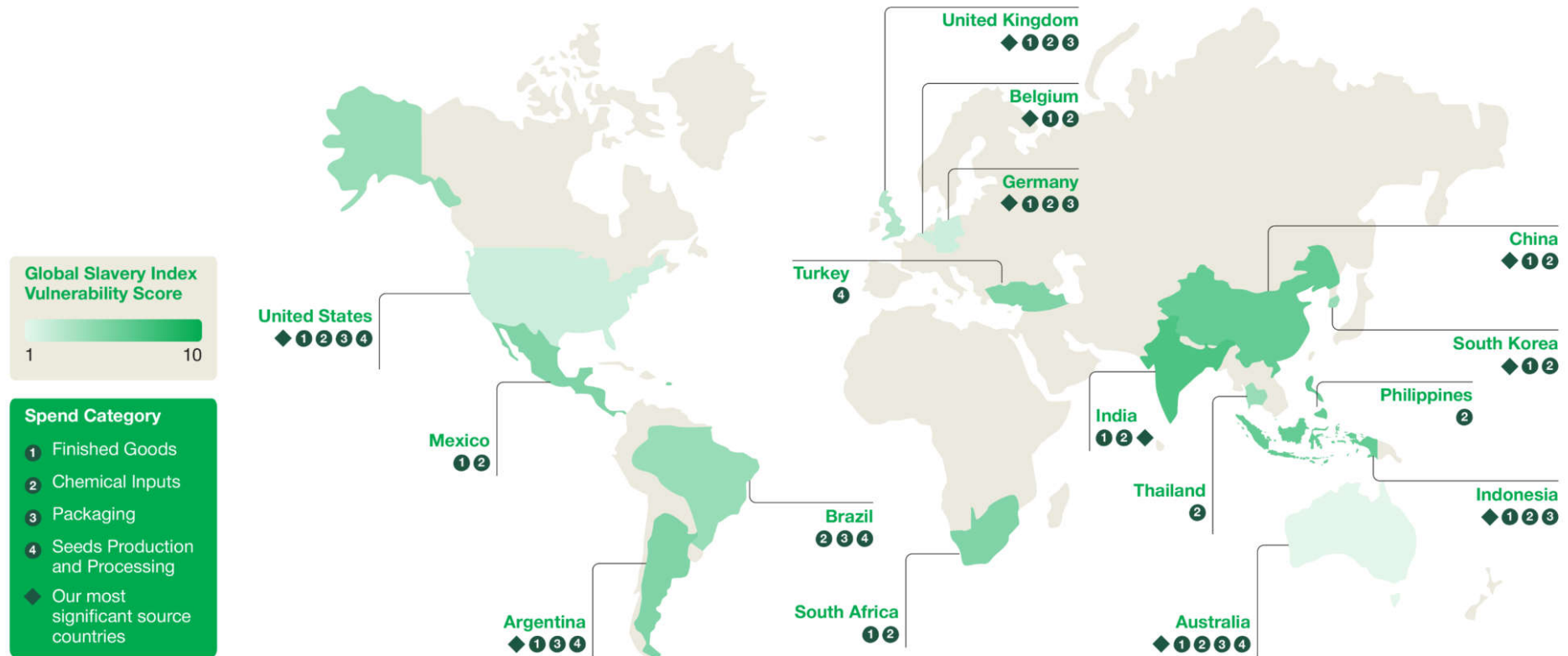
Key¹

- Caused by Where there is a risk that Nufarm's activities (or inaction) at its operations could directly result in modern slavery practices
- Contributed to Where there is a risk that Nufarm's activities (or inaction) at its operations or in its supply chain could lead to other parties engaging in modern slavery practices
- Directly linked to Where there is a risk that Nufarm could be linked to third parties who are engaged in modern slavery practices through its business relationships (excluding customers)

1 United Nations Human Rights Office of the High Commissioner. (2011). Guiding Principles on business and human rights. United Nations.

Modern slavery risks in our operations and supply chain continued

Figure 16. Source countries and their vulnerability to modern slavery¹



¹ Walk Free Foundation. (2023). The global slavery index 2023. Walk Free Foundation.

Actions taken this year

This year we have undertaken the following activities to better understand our modern slavery risk, implement controls to prevent or mitigate the risk, and measure the effectiveness of our response.

Securing equity for foreign workers

In FY22, when reviewing employment conditions for our foreign workers in Malaysia, we identified that while they had all the same employment conditions as our local workforce, they were not included in our short-term incentive plan (STIP) or bonus scheme. This was corrected in FY23 with the workers being brought into the program and receiving one-month's salary as a bonus in August 2023.

Our operating site in Malaysia also underwent a compliance audit and is now approved by the Malaysia Ministry of Health to employ foreign workers under the new Malaysian foreign worker employment regulations. This process and regulation aim to increase protections for foreign workers.

Strengthening controls for service providers

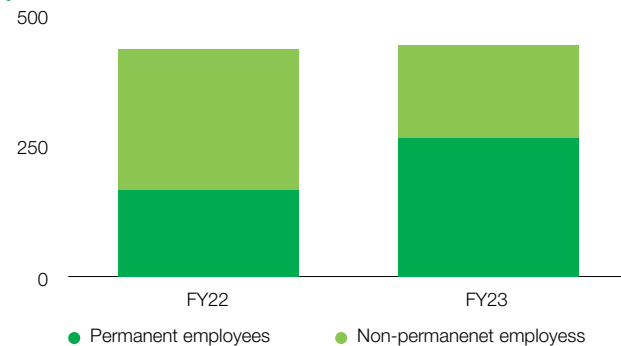
We actively approached our service providers of low-skilled labour, such as labour hire and cleaning companies, and requested they provide written agreement to adhere to our supplier code of conduct. The majority of suppliers within this target group have received and accepted the conditions outlined in our supplier code of conduct.

Providing stable employment

Last year we put in place a three-year plan to progressively transition our non-permanent sales representatives in Indonesia to permanent contracts. While these people had the same employment conditions as our permanent employees in this region, such as, leave entitlements, remuneration, incentive schemes, they were on fixed term contracts.

This year we began implementing that plan, with 61 per cent of our employees in Indonesia now on permanent contracts, up from 39 per cent in FY22. This is in line with our goal to provide stable and equitable employment to our people (Figure 17).

Figure 17. Transitioning our Indonesian employees to permanent contracts¹



¹ Measured as head count

Understanding employment practices at our operations

In FY23 we completed the modern slavery self-assessments of Nufarm locations operating in countries less vulnerable to modern slavery, having prioritised our businesses in more vulnerable countries in FY22. This included our joint venture in China. We have not found any significant gaps in our controls but have identified some opportunities for further improvement which we aim to incorporate into future action plans.

Investigating modern slavery risks in agricultural supply chains

We have adapted our seed production model to suit local agricultural supply chains. In Türkiye, we work with seed producers who contract small-holder farmers from local villages to grow our seed.

We review modern slavery risk factors and their effect on our supply chain and operations. In FY22, we identified a higher risk of modern slavery in agriculture in Türkiye (when compared with other jurisdictions in which we operate) due to the presence of Syrian refugees residing in refugee camps. These individuals are particularly vulnerable to exploitation and forced labour, leading us to plan for in-person audits during the FY23 growing season.¹

This year, our European Agronomy Manager conducted on-site audits for the first time, visiting three of our local Turkish seed producers. The audits examined factors such as the minimum age of workers, their legal status, whether workers incurred any debt in securing work, whether they were free to leave their place of work, and whether they were paid a fair wage for their work.

These audits gave us good insight since we could enter the fields where our seeds are grown, observe operations, and talk directly with labourers. The audit identified no issues of modern slavery.

We have another seed producer in Türkiye who we were unable to audit in FY23 and will endeavour to audit in FY24.

¹ Office to Monitor and Combat Trafficking in Persons. (2022). 2022 trafficking in persons report. United States Department of State, Washington, DC.

Actions taken this year continued

Expanding our ethical sourcing program within our crop protection business

Supported by our Global Procurement Sustainability Lead, we have expanded our crop protection ethical sourcing program this year. We extended our use of Ecovadis' supplier corporate social responsibility (CSR) assessment platform with the addition of Ecovadis' IQ Plus.

IQ Plus brings sustainability risk intelligence to our supplier management process, using Ecovadis' large supplier sustainability database to more quickly provide a sustainability risk rating of our suppliers. This has enabled us to assess 5,500 suppliers for sustainability risks so far.

We now have the ability to engage with higher-risk suppliers and determine whether a more comprehensive CSR assessment is warranted, offering a detailed view of our suppliers' ethical, social, and environmental impacts, risks and controls and rating the companies on these sustainability themes. We increased the number of suppliers who have

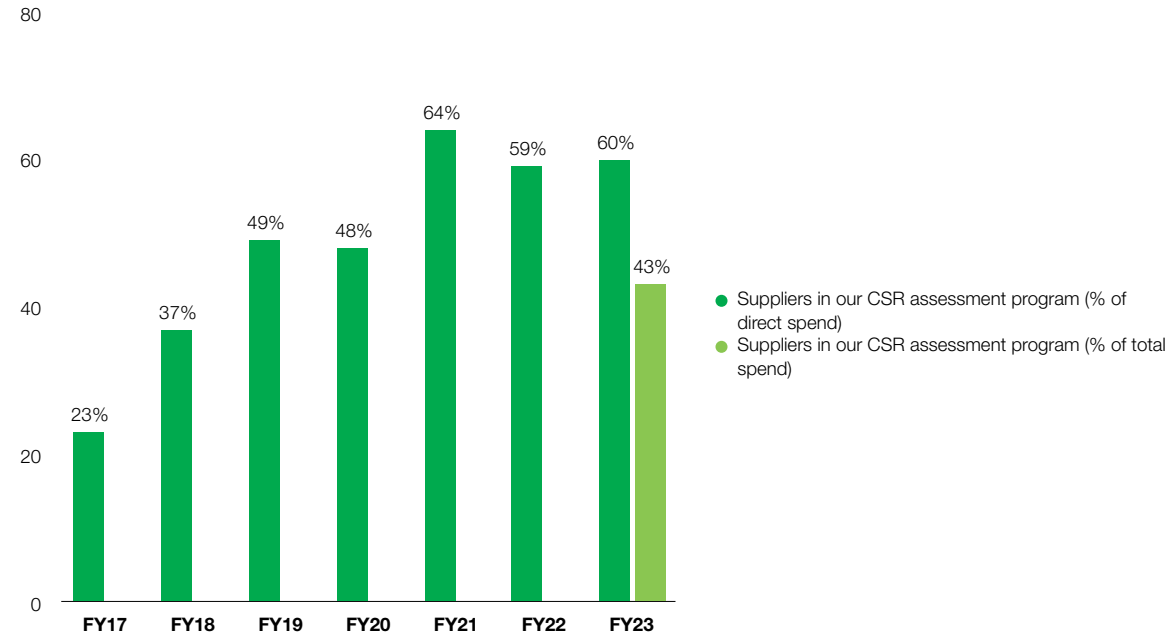
undertaken the comprehensive CSR assessment in Ecovadis this year to 337 or 43 per cent of our total supplier spend.¹ Refer to Figure 18 and also Appendix 3 for our supplier ethical sourcing data.

India is one of the countries we recognise as being more vulnerable to modern slavery,² however, we are also growing our chemicals supplier base in that region. Last year we engaged a product development manager based in India who this year, began implementing our supplier audit program with our Indian suppliers. We anticipate that this will help us to understand their current modern slavery risks and control measures so that we can work with them to address any potential gaps.

Investigating our logistics providers

This year we began to examine our logistics supply chain, identifying our key suppliers and executing our supplier code of conduct and contracts.

Figure 18. Percentage of suppliers in our CSR assessment program^{1,2,3,4,5}



- 1 Measured as a percentage of total spend (i.e. direct and indirect spend) in Australian dollars; however, prior to FY23, this was measured as a percentage of direct spend only. We changed the measure this year because we were able to increase the scope of entities included in our purchasing data.
- 2 We have expanded the number of suppliers in our ethical sourcing program this year, particularly indirect suppliers. These are mostly low-spend suppliers; consequently, the percentage coverage as a portion of spend has only marginally increased.
- 3 In FY20 we changed our financial reporting year. FY21 is the 12-month period from October 2020 to September 2021; all prior years are the 12-month period from August to July.
- 4 Suppliers in our CSR assessment program are those that have participated in an Ecovadis CSR assessment in the last three years through the Ecovadis platform.
- 5 In FY22 we erroneously reported 71 per cent due to a classification error. This has been restated here as 59 per cent.

¹ Refer to Appendix 1 on page for the entities included in this calculation.

² Walk Free Foundation. (2023). The global slavery index 2023. Walk Free Foundation.

Assessing our effectiveness

Our modern slavery steering committee reviews both our progress in delivering our planned actions and the effectiveness of our due diligence procedures at identifying and managing modern slavery risk. We also look to external subject matter experts' reports and peer reviews to help guide improvement opportunities. The performance measures that we use to help track our progress are shown in Table 4.

Some of the challenges we face in identifying and managing modern slavery risk include:

- the scale and complexity of our supply chain
- the breadth of our organisation and the disparate business systems
- evaluating deeper into the supply chain than our tier 1 suppliers

Table 4. Our modern slavery key performance indicators (KPIs)

Measures	Description	FY22	FY23
Self-assessments	Modern slavery self-assessment conducted on Nufarm employee locations	15%	100%
Supplier participation	Supplier participation in our corporate social responsibility (CSR) assessment program ¹	Not available ²	337 suppliers (or 43% of spend)
Supplier performance	Supplier CSR assessment score on social themes (including human rights and modern slavery) benchmarked against more than 100,000 suppliers assessed by Ecovadis globally	22% above global average	No change
Suppliers' management of human rights matters at their operations³	Suppliers assessed by Ecovadis and found acting on: <ul style="list-style-type: none"> • modern slavery • employee working conditions • employee health and safety 		39% (31% in high-vulnerability countries) ⁴ 43% (32% in high-vulnerability countries) 45% (52% in high-vulnerability countries)
Suppliers' management of human rights matters in their supply chain⁵	Suppliers assessed by Ecovadis and found to be undertaking supplier CSR assessment (i.e. our > tier 1 suppliers) ⁶		28 % (15% in high-vulnerability countries) ⁶
Employee modern slavery education	Senior leadership team engaged in a modern slavery education activity	24%	No change
	Human resources talent acquisition and business partners engaged in a modern slavery education activity.	80%	No change
	Procurement team engaged in a two-yearly modern slavery education activity.	15%	100%

1 Suppliers in our CSR assessment program are those that have participated in an Ecovadis CSR assessment in the last three years through the Ecovadis platform.
 2 In FY22 we erroneously reported 157 direct suppliers had undergone an Ecovadis assessment, however this was not over the three-year time period. We are unable to recalculate this retrospectively.
 3 In FY22 we measured these KPIs as a percentage of our spend in high-risk countries, this year we have measured this as a percentage of total spend as we increased the scope of entities included in our purchasing data.
 4 Suppliers management of human rights at their operations in high-risk countries is measured as the percentage of spend on suppliers in high-risk countries who are taking actions on human rights matters, over the total spend in high-risk countries.
 5 Our tier 1 suppliers are those from whom we directly source materials and services. Our tier 2 suppliers are those that supply our tier 1 suppliers, and our tier 3 suppliers are those that supply our tier 2 suppliers, and so on.
 6 Suppliers management of human rights at their supply-chain in high-risk countries is measured as the percentage of spend on suppliers in high-risk countries who are taking actions on human rights matters, over the total spend in high-risk countries.

Our next steps

Managing modern slavery risk is an ongoing activity and we are committed to preventing or minimising this risk through continuous improvement.

Our priorities for FY24 are:

- 1 To help increase our potential reach and impact, we endeavour to identify means of collaborating within our supply chain and industry on sustainability, including modern slavery.
- 2 We aim to prepare a plan for a supplier assessment program to help us identify and assess counterparty risk for new suppliers. We anticipate extending this to modern slavery risk.
- 3 To ensure our ethical and legal business conduct expectations are met, we aim to establish agreements with the labour hire companies that provide foreign workers to our facility in Malaysia.
- 4 To provide assurance that our seed producers are managing modern slavery risk within their workforce, we aim to complete the audits of our Turkish seed producers by carrying out one more on-farm audit.
- 5 We aim to develop a training package to be deployed to key internal stakeholders.



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Our engagement with entities covered by this statement

We took the following steps to consult with the entities covered by this statement this year:

- Our Group Executive Growth and Sustainability and Global General Counsel and Company Secretary reviewed the statement and it was reviewed and approved by our Group Executive Supply Chain Operations and Group Executive People and Performance.
- We communicated the statement to the regional general managers of the entities covered by this statement.
- Nufarm Limited's board of directors reviewed and approved this statement.



Appendix 1 . Entities covered by this statement

Table 5 lists all entities represented in this modern slavery statement. These entities are wholly owned Nufarm subsidiaries and are included in Nufarm’s audited consolidated financial statements. Nufarm’s financial statements also include non-operating subsidiaries which are not included here.

Table 5. Entities covered by this statement

Entity	Place of incorporation	Business description
Nufarm Limited	Australia	Ultimate controlling entity
Subsidiaries		
Croplands Equipment Ltd ¹	New Zealand	Crop equipment
Croplands Equipment Pty Ltd ¹	Australia	Crop equipment
Danestoke Pty Ltd	Australia	Holding company
Medisup Securities Limited	Australia	Holding company
Agryl Holdings Limited	Australia	Holding company
Nufarm Agriculture Inc	Canada	Crop protection
Nufarm Agriculture (Pty) Ltd	South Africa	Crop protection
Nufarm Americas Inc	USA	Crop protection
Nufarm Australia Ltd	Australia	Crop protection
Nufarm Brazil SA	Brazil	Seeds
Nufarm BV	Netherlands	Crop protection
Nufarm Chemical (Shanghai) Co Ltd	China	Crop protection
Nufarm Crop Products UK Limited	Australia	Crop protection
Nufarm Deutschland GmbH	Germany	Crop protection
Nufarm España SA	Spain	Crop protection
Nufarm Europe GmbH	Germany	Crop protection
Nufarm GmbH & Co KG	Austria	Crop protection
Nufarm Grupo Mexico S DE RL DE CV	Mexico	Crop protection
Nufarm Hungária Kft	Hungary	Crop protection
Nufarm Italia srl	Italy	Crop protection
Nufarm KK ¹	Japan	Crop protection
Nufarm Korea Limited ¹	Korea	Crop protection
Nufarm Malaysia Sdn Bhd	Malaysia	Crop protection
Nufarm Middle East Operations ¹	Egypt	Crop protection
Nufarm Nordics AB	Sweden	Crop protection
Nufarm NZ Limited	New Zealand	Crop protection
Nufarm Polska SPZ O.O	Poland	Crop protection
Nufarm Portugal LDA	Portugal	Crop protection
Nufarm Romania SRL	Romania	Crop protection
Nufarm s.a.s	France	Crop protection
Nufarm Services (Singapore) Pte Ltd	Singapore	Crop protection
Nufarm Services Sdn Bhd	Malaysia	Crop protection
Nufarm Turkey Import & Trade of Chemical Products LLP	Türkiye	Crop protection
Nufarm UK Limited	United Kingdom	Crop protection
Nufarm Ukraine LLC	Ukraine	Crop protection
Nugrain Pty Ltd	Australia	Holding company
Nuseed Americas Inc	USA	Seeds
Nuseed Canada Inc	Canada	Seeds
Nuseed Europe Ltd	United Kingdom	Seeds
Nuseed Global Holdings Pty Ltd	Australia	Holding company
Nuseed Global Innovation	United Kingdom	Seeds
Nuseed International Holdings Pty Ltd	Australia	Holding company
Nuseed Global Management USA Inc	USA	Seeds

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Appendix 1 . Entities covered by this statement^{continued}

Entity	Place of incorporation	Business description
Nuseed Nutritional Australia Pty Ltd	Australia	Seeds
Nuseed Nutritional US Inc	USA	Seeds
Nuseed Pty Ltd	Australia	Seeds
Nuseed Russia LLC	Russia	Seeds
Nuseed SA	Argentina	Seeds
Nuseed Serbia d.o.o	Serbia	Seeds
Nuseed Ukraine LLC	Ukraine	Seeds
PT Nufarm Indonesia	Indonesia	Crop protection
Richardson Seeds	USA	Seeds
Leshan Nong Fu Trading Co., Ltd. ²	China	Crop protection joint venture



1 Not included in our procurement spend data.

2 Leshan Nong Fu Trading is a joint venture in which the group has joint control and a 35 percent ownership interest. The joint venture is focused on sales and marketing of formulated crop protection products in China. Of the policies and procedures set out in this statement, this entity's supply chain is currently subject to our global supplier code of conduct and our supplier corporate social responsibility assessment program only.

Appendix 2. Addressing modern slavery reporting criteria

The following is an index of disclosures that meet mandatory reporting criteria of both the *Australian Modern Slavery Act 2018* and the *UK Modern Slavery Act 2015*.

Table 6. Modern slavery reporting indexes

Australian Modern Slavery Act 2018 mandatory reporting criteria	References in this statement	UK Modern Slavery Act 2015 mandatory reporting criteria	References in this statement
Identify the reporting entity	Pages 3-4 and 27-28	Identify the reporting entity	Pages 3-4 and 27-28
Describe the reporting entity's structure, operations and supply chains	Pages 8-11	Organisation's structure, business and supply chain	Pages 8-11
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Pages 19-22	Policies in relation to slavery and human trafficking	Pages 13-14
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Pages 12-18 and 23-24	Due diligence processes	Pages 12-18
Describe how the reporting entity assesses the effectiveness of these actions	Pages 25	Risk of slavery and human trafficking in the business and supply chain and steps taken to assess and manage the risk	Pages 19-22 and 23-24
Describe the process of consultation with any entities the reporting entity owns or controls	Page 26	Key performance indicators to measure effectiveness of steps being taken	Pages 25
Other relevant information	Our next steps on page 25	Training on modern slavery and trafficking	Pages 16 and 25
Approval by the principal governing body and signed by a responsible member of the reporting entity	Pages 3-4 and 5	Approval by the board of directors (or equivalent) and signed by a director (or equivalent) or designated member	Pages 3-4 and 5
Publish the statement within six months of the organisation's financial year end	This statement was published on 28 March 2024, six months after Nufarm's financial year end on 30 September 2023. Our statement is available on our corporate website Nufarm.com: 	Publish the statement within six months of the organisation's financial year end	This statement was published on 28 March 2024, six months after Nufarm's financial year end on 30 September 2023 Our statement is available on our UK website nufarm.co.uk: 

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Appendix 3. Our ethical sourcing data

Table 7. Supplier ethical sourcing data

Supplier social impacts	FY23	
	Count	% of total spend
New suppliers assessed for social impacts		
Direct suppliers	73	7%
Indirect suppliers	164	2%
Total new suppliers assessed	237	9%
Suppliers assessed for social impacts this year		
Direct suppliers	68	20%
Indirect suppliers	9	<1%
Total suppliers reassessed	77	21%
Suppliers with an executed supplier code of conduct		
Direct suppliers	5	<1%
Indirect suppliers	86	1%
Total number of suppliers	91	1%
Suppliers in our CSR assessment program ^{1, 2}		
Direct suppliers	176	40%
Indirect suppliers	161	3%
Total suppliers in our CSR assessment program	337	43%
Suppliers in our CSR assessment program or with an executed supplier code of conduct		
Direct suppliers	181	40%
Indirect suppliers	247	3%
Total suppliers in our CSR assessment program	428	44%
Significant supplier social impacts and their improvement plans ³		
Suppliers with significant social impacts	0	0%
Suppliers with agreed improvement plans	0	0%
Suppliers terminated due to social impacts	0	0%

1 Suppliers in our CSR assessment program are those that have participated in an Ecovadis CSR assessment in the last three years through the Ecovadis platform.

2 In FY22 we erroneously reported 157 direct suppliers had undergone an Ecovadis assessment, however this was not over the three-year time period. We are unable to recalculate this retrospectively.

3 Significant impacts are reported in the year they are first identified; however they may relate to historical incidents.

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