

Modern slavery statement 2021



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A message from our Chief Executive Officer



We are committed to upholding human rights, wherever in the world we work.

Viterra is a world-leading, fully integrated agriculture network that connects producers and consumers to supply sustainable, traceable and quality-controlled agricultural products.

We place a high priority on food security and ensuring the continued movement of food ingredients to all areas of need, this was particularly important in 2021 as the global pandemic continued to have impact.

As the demand for agricultural goods increases, we need to make sure this increase in demand is not met at the expense of our communities or the environment.

A zero tolerance approach to modern slavery in any form is a moral imperative for our company and we support the goal of reducing the exploitation of individuals at the hands of others. Throughout our operations, we seek to avoid complicity in human rights abuses and to uphold relevant international standards.

With more than 17,200 talented employees operating in 37 countries, we recognise that we have a responsibility to respect the dignity, liberty and equality of everyone with whom we work and of all of the people in the communities in which we operate.

Viterra is pleased to share this modern slavery statement for 2021, which outlines our approach to mitigate the risks of modern slavery and human trafficking in our business operations and supply chains.

David Mattiske

Chief Executive Officer

Key modern slavery actions 2021

- We received no reported human rights including modern slavery breaches in 2021 through our various channels
- We have reviewed and realigned this statement with our approach to modern slavery to provide more information for the audience
- We completed our internal human rights impact assessment survey to identify, understand and assess the potential human rights threats present within our own business and supply chains
- We have extended awareness of our human rights policy which was introduced in 2020
- We added modern slavery clauses in certain contracts in 2021 and we intend to add similar clauses to additional contracts in 2022.

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

This is our fourth modern slavery statement published in accordance with the United Kingdom Modern Slavery Act 2015 and our second in accordance with the Australian Modern Slavery Act 2018.

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 in a number of regions.

Viterra Limited is a privately held company incorporated in Jersey. We are owned by three shareholders: Glencore plc, 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: 81 161 229 867; ACN: 161 229 867) and Viterra Australia Holdings Pty Ltd; Level 1, 186 Greenhill Road, Parkside SA 5063 (ABN: 87 137 191 023; ACN: 137 191 023)

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

Our sustainability committee, which includes senior executives from the reporting entities, namely our Chief Executive Officer, Chief Financial Officer, Global Sustainability Manager 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 which was reviewed and updated in 2021. It is responsible for determining policy and strategy and for monitoring relevant risk management and performance. The committee meets quarterly and discusses and reviews Viterra's approach to upholding human rights in those meetings. It reports directly to the board of directors through routinely scheduled risk updates.

This statement was approved by our global executive team and board of directors of Viterra Ltd (the parent company for the Viterra group) on 7 September 2022.

Who we are

We believe in the power of connection.



Viterra's world-leading, fully integrated agriculture network connects producers and consumers to supply sustainable, traceable and quality-controlled agricultural products.

With our talented people, decades of experience and diverse capabilities, we offer innovative solutions to open up pathways and create value for customers through our supply chains.

As a responsible, long-term business, we continue to invest in and develop our network, allowing us to meet the needs of a growing world.

Our business covers the whole supply chain, from the farm gate to the end user.

We source commodities such as grains, oilseeds, pulses, rice, sugar and cotton from producers.

Using our network of storage facilities, processing plants and transport assets, we process, manage and supply these agricultural commodities and products to our end use customers around the world. These include the processing industry with food, animal feed and consumer products, local importers and distributors and governments.

We pride ourselves on being a responsible business that cares for our customers, our people, our communities and the environment. We prioritise safety and sustainability throughout our network and continuously look to improve our performance.

Who we are

Our values

Viterra's values empower our people to behave in ways that contribute to the success of our business as well as treating the world with respect.

We make things happen

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 connected

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.



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 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 are open

We are true to our word. We partner with colleagues and customers in a positive, straightforward way, operating with transparency and integrity to be successful.

Our operations and supply chain

What we do

Viterra operates on a global scale, marketing and distributing physical agricultural commodities mainly sourced from third party producers to industrial consumers, such as those in the oil and food processing industries.

We also provide logistics and other services to producers and consumers of agricultural commodities and products. In this regard, Viterra seeks to capture value throughout the commodity supply chain.

Our experience in production, processing, storage and handling, and marketing of agricultural commodities has allowed us to develop and build upon our expertise in the commodities we market. We have cultivated long-term relationships with a broad supplier and customer base across diverse industries and in multiple geographic regions.

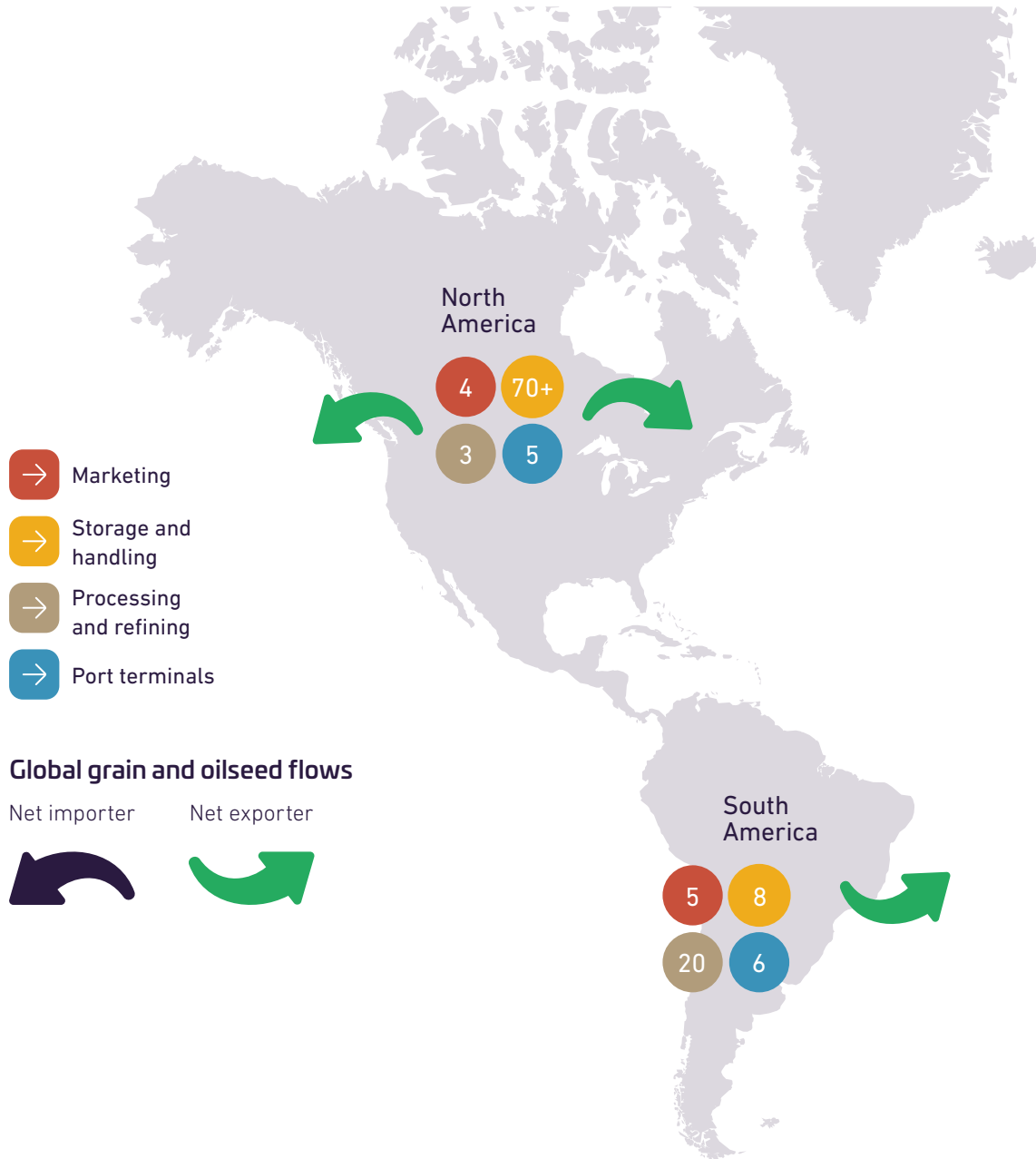
Viterra's agriculture network draws on close relationships with producers, suppliers and consumers to source sustainable and traceable agricultural commodities and deliver them worldwide.

Viterra oversees agricultural commodities from the origination point in the growing region. We transport them to and from storage, processing facilities and port terminals via road, rail or vessel all year round.

We are a major employer in many of the areas where we operate and have a responsibility for the health, prosperity and sustainability of those communities. Our workforce is made up of permanent employees, part-time employees and casual employees including seasonal workers and contractors. Of our 17,200+ employees in 2021, 24% were contractors.

Our operations bring social benefits to local communities through employment, trainee programmes and programmes with schools and universities. We also support local initiatives with donations, sponsorship and fundraising activities and the expertise and support of our staff who volunteer their time. We support initiatives and projects that contribute positively to the wellbeing of the local communities surrounding our operations and offices.

Network map



Our network in numbers

Marketing

90m
tonnes of
agricultural
commodities
marketed in 2021

marketing offices in

32
countries

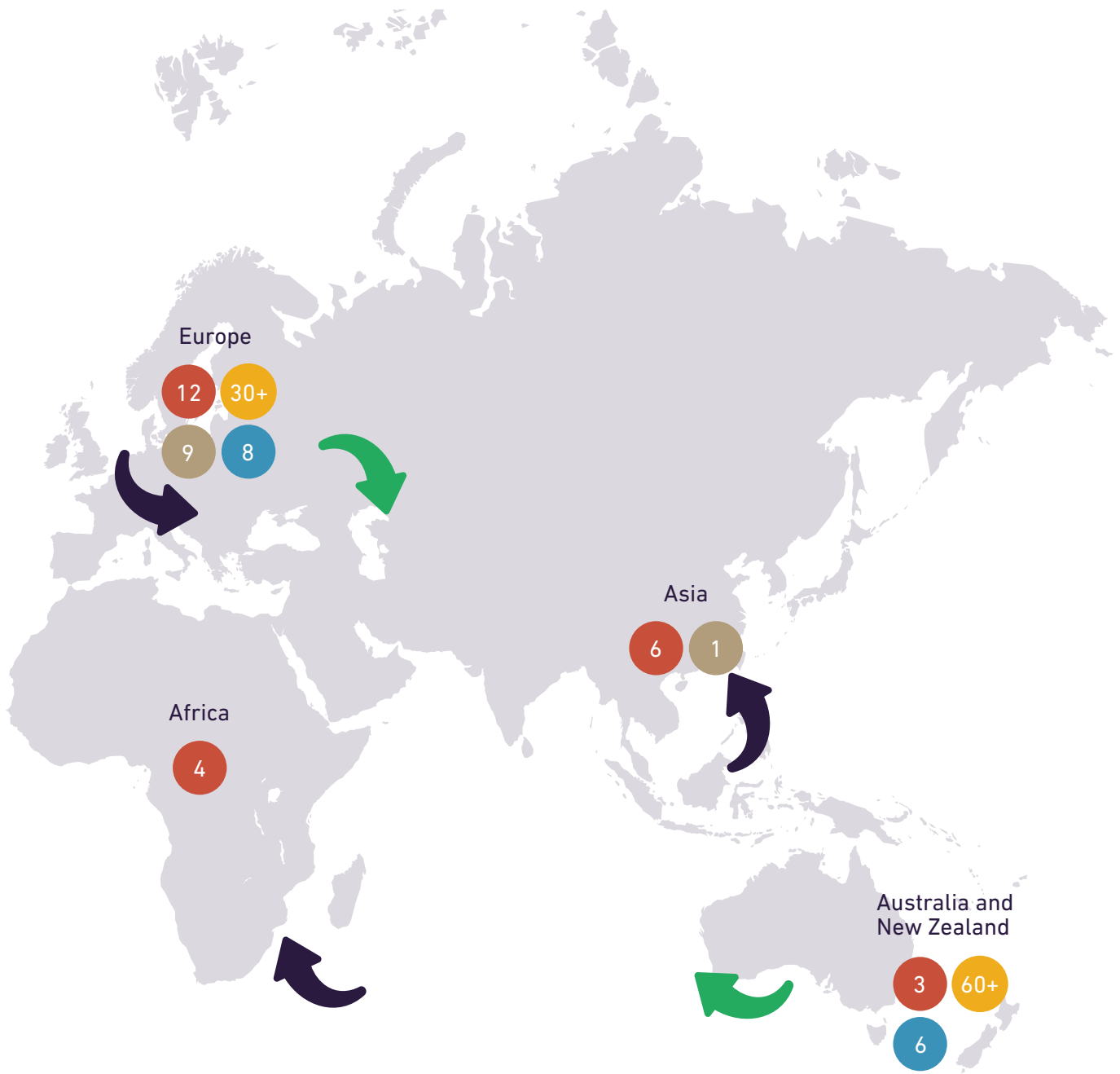


Storage and handling

180+
storage facilities in

14
countries





Processing and refining



30+
facilities in
13
countries

Logistics



2,000+
owned or leased
rail wagons
200+
ocean-going vessels

Port terminals



25
port terminals in
9
countries

Risks of modern slavery practices

Viterra does not accept modern slavery practices in any of our business activities, from our third parties or our suppliers. We have zero tolerance towards any form of forced labour, child labour, 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 internal assessment, potential human rights related risks include:

- the use of child labour
- 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 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 peoples
- transporting goods over land and ocean with an associated risk of human trafficking through the black market
- discrimination of people.

Actions and due diligence to address modern slavery risks

Our approach to modern slavery risks includes:

- our policies
- implementation, training and awareness
- identification and due diligence
- collaboration and stakeholder engagement.

Our policies

Our policies are our 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 and available to employees on our internal systems.

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



Actions and due diligence to address modern slavery risks

Our policies

Policy or document	Relevance to modern slavery	How it is available
Statement of values Click to view	<p>Our values include how we are responsible for people and communities, continuously looking to improve our performance.</p> <p>They explain that we are true to our word and partner with customers in a positive way operating with transparency and integrity.</p> <p>They also state how we make things happen and empower our people to make well-informed decisions.</p>	<p>Viterra.com, internal systems and introductory training</p>
Code of conduct Click to view	<p>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.</p> <p>It includes information on raising concerns, our people, human rights and communities.</p> <p>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.</p>	<p>Viterra.com, internal systems and introductory training</p>
Global anti-corruption policy Click to view	<p>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.</p> <p>This policy informs colleagues on the various forms in which bribery and corruption can take place, and how to identify and report suspected breaches of this policy.</p>	<p>Viterra.com, internal systems and annual training</p>
Human rights policy Click to view	<p>This 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.</p> <p>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.</p>	<p>Viterra.com and internal systems</p>
HSEC policy	<p>Our health, safety, environment and community (HSEC) policy is underpinned by our values and our approach to sustainability.</p> <p>It states how we uphold human rights and support the long-term development of the local communities in which we operate.</p> <p>This policy is available to all employees through the Viterra intranet and is visually displayed at appropriate locations.</p>	<p>Internal systems</p>

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 approach and raise potential breaches of modern slavery so we can address them.

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

Both our employees and contractors are 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 in our supply chains, and our commitment to paying at least minimum wages in accordance with local regulations.

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

Viterra requires employees who have responsibility for ensuring the implementation of human rights to undergo further training aligned with international standards if relevant. We operate grievance mechanisms for our stakeholders throughout our operations.

Human rights policy training

We published our Human rights policy in 2021 which 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 in our workplace or along our supply chains.

The policy was sent to all employees with work email addresses globally, and in Australia, training on the policy was added to 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 raising concerns programme (explained on page 14).

Sustainability report

We have published our annual sustainability report since 2018. The report details our commitment and progress in health and safety, environment, community, human rights and food and feed safety.

It also includes case studies detailing initiatives within our global business across all these topics.

Actions and due diligence to address modern slavery risks

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 report human rights breaches including modern slavery through our mechanisms.

Our due diligence processes have been designed with reference to key human rights standards and 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 they 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. It was relaunched in 2020 following the global rebrand from Glencore Agriculture to Viterra. New posters were delivered to all sites in our network including Australia and the UK.

There were 91 concerns raised through our Raising Concerns platform in 2021 and investigated by our compliance team, none of which were modern slavery related.

Know your counterparty procedure

Know your counterparty identifies and verifies counterparties Viterra engages with, checking for any red flags such as money laundering, terrorism financing, corruption, bribery, sanctions and human rights violations.

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. There is a global screening system available and local checks can also be carried out.

Supplier due diligence in our soy supply chains

We incorporate a georeferencing farm monitoring system into our Brazilian 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.

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

If a modern slavery risk is detected with a supplier, our zero tolerance policy means we would cease working with them straight away.

Collaboration and stakeholder engagement

We 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.

In Australia, we have added modern slavery clauses to our design and construct contract and our consultancy agreement with a plan to add a similar clause to more contracts for 2022.

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 2021:

United Nations Global Compact (UNGC)

Viterra has been a member of the United Nations Global Compact (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 the 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, or those 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.

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.

Actions and due diligence to address modern slavery risks

Better Cotton Initiative (BCI)

BCI supports farmers by helping them understand and respect national legal requirements, as well as the fundamental, interrelated International Labour Organization 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.

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.

Though we had no reported human rights breaches in 2021 through our various channels, we acknowledge the need for further action across the industry and are working to further advance how we address modern slavery risks in our business.

We completed our internal human rights impact assessment to identify, understand and assess the potential human rights threats present within our own business and supply chains. The results were collated and a report tabled with the sustainability committee. The assessment identified there are no material human rights risks within our business or supply chains. While there is no specific actions to be taken as an outcome of the assessment, human rights is an ever present risk and something we will continue to monitor and explore potential forward looking actions.

Our supplier code of conduct is in development. It will detail the requirements and expectations we have for all our suppliers based on internationally accepted standards, as well as our values, code of conduct and our policies including our global anti-corruption and human rights policies.



Disclaimer

This document contains statements that are, or may be deemed to be, "forward looking statements" which are prospective in nature. These forward looking statements may be identified by the use of forward looking terminology, or the negative thereof such as "outlook", "plans", "expects" or "does not expect", "is expected", "continues", "assumes", "is subject to", "budget", "scheduled", "estimates", "aims", "forecasts", "risks", "intends", "positioned", "predicts", "anticipates" or "does not anticipate", or "believes", or variations of such words or comparable terminology and phrases or statements that certain actions, events or results "may", "could", "should", "shall", "would", "might" or "will" be taken, occur or be achieved. Such statements are qualified in their entirety by the inherent risks and uncertainties surrounding future expectations. Forward-looking statements are not based on historical facts, but rather on current predictions, expectations, beliefs, opinions, plans, objectives, goals, intentions and projections about future events, results of operations, prospects, financial condition and discussions of strategy. By their nature, forward looking statements involve known and unknown risks and uncertainties, many of which are beyond Viterra's control. Forward looking statements are not guarantees of future performance and may and often do differ materially from actual results. Neither Viterra nor any of its associates or directors, officers or advisers, provides any representation, assurance or guarantee that the occurrence of the events expressed or implied in any forward-looking statements in this document will actually occur. You are cautioned not to place undue reliance on these forward looking statements which only speak as of the date of this document. Other than in accordance with its legal or regulatory obligations, Viterra is not under any obligation and Viterra and its affiliates expressly disclaim any intention, obligation or undertaking to update or revise any forward looking statements, whether as a result of new information, future events or otherwise. This document shall not, under any circumstances, create any implication that there has been no change in the business or affairs of Viterra since the date of this document or that the information contained herein is correct as at any time subsequent to its date.

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Viterra Ltd, incorporated in Jersey, is the ultimate parent company of among others Viterra UK Ltd, Belfurt Ltd (both of which are incorporated in the United Kingdom) and Viterra Holdings Pty Ltd and Viterra Australia Holdings Pty Ltd (both of which are incorporated in Australia). The text of this statement intends to comply with Section 54 of the Modern Slavery Act 2015, with regards to these UK incorporated legal entities and their operations and with the Australian Modern Slavery Act 2018, with regards to the Australian incorporated legal entities and their operations.

The companies in which Viterra directly and indirectly has an interest are separate and distinct legal entities.

In this document, "Viterra", "The Group" and "Group" are used for convenience only where references are made to Viterra and its subsidiaries in general. These collective expressions are used for ease of reference only and do not imply any other relationship between the companies.

Likewise, the words "we", "us" and "our" are also used to refer collectively to members of the Group or to those who work for them. These expressions are also used where no useful purpose is served by identifying the particular company or companies.



Contact

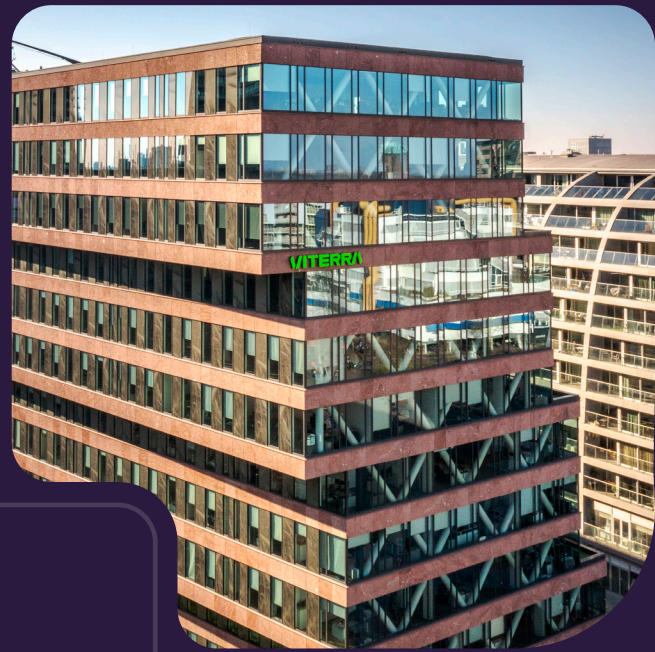
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agriculture network

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