



This statement is made pursuant to Section 54 (Part 6) of the UK Modern Slavery Act 2015 and Part 1 Section 5(1) of the Australian Modern Slavery Act 2018 by Koch Ag & Energy Solutions LLC for the financial year ending December 31, 2020. Koch Ag & Energy Solutions, LLC and its subsidiaries are referred to herein collectively as “KAES”.

## **Introduction**

KAES is a global provider of value-added solutions for the agriculture, energy and chemical markets. We are a wholly owned subsidiary of Koch Industries, Inc. KAES is one of the world's largest producers and marketers of fertilizers. These companies own or have interests in fertilizer plants in the U.S., Canada, and Trinidad and Tobago and a distribution network covering global demand through state-of-the-art terminals in the U.S., Canada, Mexico, Brazil, and Australia.

KAES is committed to conducting all affairs lawfully and with integrity. This commitment extends throughout our global organizations, no matter where we do business. Relationships with persons or entities who provide goods or services to KAES or who are authorized to conduct business for or on our behalf (collectively, “Third Parties”) who demonstrate they share this commitment are a key part of KAES’s continued success. KAES’s compliance and ethics expectations are set out in the Koch Code of Conduct, and in training and other communications we provide to our own employees, officers, advisers, agents and representatives, as well as our suppliers and other third parties.

## **Our Supply Chains**

As part of our initiative to identify and mitigate risk, we have processes in place to vet our employees as well as Third Parties prior to them engaging in any business activities. Individuals that work for KAES go through various screening processes based on what their role will be at KAES. Non-compliance with laws, regulations and our standards regarding human trafficking and slavery will result in corrective action, up to and including termination, depending on the circumstances. The Koch Code of Conduct identifies numerous avenues to individuals, whether employees or Third Parties, for reporting compliance concerns, including on an anonymous basis (where allowed by law). Concerns raised are objectively investigated under the guidance and direction of our compliance or legal departments. KAES prohibits retaliation against anyone who, in good faith, raises a concern.

Evidence of the management of our compliance and ethics expectations in relation to human trafficking and slavery/forced labor in our supply chains, can be found in Koch’s Code of Conduct, which states:

Our companies strive to make people’s lives better through the products we make, support for the communities in which we live and work, maintaining quality work environments, and sourcing responsibly. We are committed to adhering to applicable employment and labor laws everywhere we operate. This includes observing those laws that pertain to child labor, forced labor, human trafficking, wages and work hours and freedom of association.

We perform internal checks and have contracted with outside services to monitor our business relationships with Third Parties to avoid dealings with individuals or businesses that do not align with

our values. All Third Parties go through various screening processes based on the perceived risk of the interaction. KAES maintains a Third Party vetting program which describes the process for selecting Third Parties in alignment with KAES's risk philosophy, including but not limited to preventing transactions with Third Parties that are in violation of the law. Part of the program focuses on enhanced vetting for Third Parties in high risk jurisdictions. Our suppliers, distributors, and agents may conduct business in locations that are known to have elevated risks. There is no widely known risk of human trafficking or slavery in the industry, however locations where we have business could have an elevated risk regardless of the industry.

### **Training on Human Trafficking & Slavery**

Due to the perceived low risk, KAES does not have a comprehensive, mandatory training program focusing on human trafficking and slavery.

### **Supplier Adherence to Our Values**

We expect all those in our supply chain to comply with our values. We maintain standard Terms and Conditions that require counterparties to fully comply with applicable laws and regulations. Due to the perceived low risk, KAES does not have a direct supplier certification process specifically focused on human trafficking and slavery.

This statement is made and reflects the position of KAES, approved by the KAES Board of Directors as of 05/05/2021.



Troy Honeywell  
Manager, Board of Directors  
Koch Ag & Energy Solutions, LLC