



## Knowledge grows

### 2023 Modern Slavery Transparency Statement

#### Yara International ASA

##### 1. About this statement

Yara International ASA (Yara) 2023 Modern Slavery Transparency Statement (**Statement**) is for the financial year 1 January – 31 December 2023. The statement is pursuant to the UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018 (Cth) and the Canadian Act to enact the Fighting Against Forced Labor and Child Labor in Supply Chains Act 2022 (Canadian Modern Slavery Act).

Yara operates and is managed as an integrated group with overarching policies, systems and processes that apply across our controlled entities. Yara's 2023 Modern Slavery Transparency Statement has therefore been prepared as a joint statement that is valid for Yara International ASA and its subsidiaries. These include, but are not limited to, Yara UK Limited, Yara Pilbara Fertilisers Pty Ltd, Yara Canada Inc., Yara Belle Plaine Inc. and Yara North America Inc. This statement is also valid for Yara Pilbara Nitrates Pty Ltd, an entity that is not fully owned, but operated by Yara and falls under the reporting requirements of the Australian Modern Slavery Act 2018. Yara Pilbara Nitrates Pty Ltd follows relevant Yara policies and procedures and utilizes Yara systems.

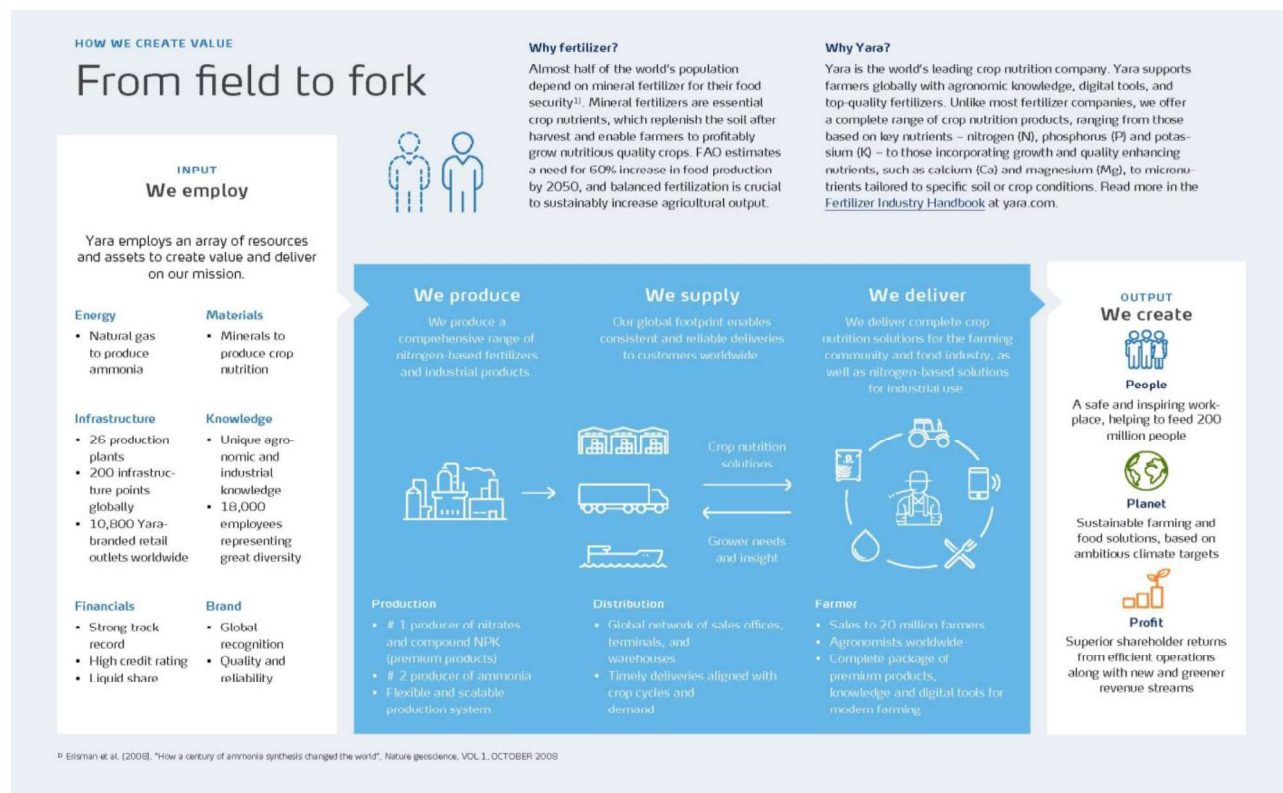
The statement is prepared based on information collected from all subsidiaries, and the entities mentioned above have been consulted on the statement itself.

The table below sets out the reporting requirements and recommendations pursuant to the UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018 (Cth) and the Canadian Modern Slavery Act 2022 and where these are addressed in our statement.

Australian Act requirements	UK Act Guidance	Canadian Act Requirements	This statement
Identify the reporting entity.		Reporting entity's legal name and business number(s) if applicable.	1. About this statement, p.1
Describe the structure, operations and supply chain of the reporting entity.	Describe the organisation's structure, its business and its supply chain.	Describe the structure, activities and supply chains.	1. About this statement, p.1 2. Our business and value chain, p.2 6. Governance, p.7
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Describe the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk.	Describe the parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk.	5. Actions, p.5
Describe the actions taken by the reporting entity and any entities that reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes.	Describe its policies in relation to slavery and human trafficking.  Describe its due diligence processes in relation to slavery and human trafficking in its business and supply chain.	Describe its policies and its due diligence processes in relation to forced labour and child labour.  Any measures taken to remediate any forced labour or child labour.  Any measures taken to	3. Policies and commitments, p.3 4. Human Rights Due Diligence, p.4 5.2. Identified adverse human rights impacts, p.5 8. Training and awareness, p.8

		remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains.	
Describe how the reporting entity assesses the effectiveness of these actions.	Describe its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.	Describe how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains.	9. Assessing Effectiveness, p.8
Describe the process of consultation with any entities the reporting entity owns or controls. In the case of a joint statement this must also describe consultation with the entity giving the statement.			1. About this statement, p.1
	Describe the training and capacity building about slavery and human trafficking available to its staff.	Describe the training provided to employees on forced labour and child labour.	8. Training and awareness, p.8
Any other relevant information.		Additional information on measures that entities may have taken to prevent and reduce risk of forced labour and child labour.	5. Actions, p.5

## 2. Our business and value chain



Yara grows knowledge to responsibly feed the world and protect the planet. Supporting our vision of a world without hunger and a planet respected, we pursue a strategy of sustainable value growth, promoting climate-friendly crop nutrition and zero-emission energy solutions. Yara has a worldwide presence with about 18.000 employees and operations in over 60 countries.

Our business model combines production, sales and marketing in one, global system. It enables us to deliver premium products, share knowledge, and develop innovative solutions to farmers, distributors and food value chains worldwide.

Our operations are based on the efficient conversion of energy, and of natural minerals and nitrogen from the air into essential products for agriculture and industry. As the leading global provider of nitrogen fertilizers and industrial applications, we leverage our experience and knowledge to tailor solutions to local needs. Yara's value chain starts with mining operations and the sourcing of raw materials and extends to the distribution of crop nutrition and industrial solutions to customers worldwide.

A large part of Yara's overall costs are variable and related to sourcing. We source a wide variety of goods and services from more than 30.000 suppliers worldwide. Sourcing of natural gas and nutrients are important elements of our purchases and operating expenses. Close to 80% of Yara's operating expenses are related to the purchase of raw materials, energy costs and freight expenses. We have developed strong relationships with key suppliers to ensure continuity and profitability in our business.

The main materials and services used in our value chain are:

- Feedstock and energy, mainly natural gas, and in some cases other forms of hydrocarbons, and electricity. These are produced in many regions across the world and mostly sourced locally, close to our production locations, for the production of nitrogen fertilizers and industrial products.
- Ammonia and Nitrogen-based products (N), which are produced in the same way as Yara produces these, in many regions across the world, especially in so-called low-gas costs regions, such as the Middle East. These are sourced as input for our production processes, in addition to the materials we produce ourselves.
- Phosphorus (P), which occurs in natural geological deposits of phosphate rock, mined from the earth's crust. The largest phosphate rock resources are located in Morocco, China, Algeria, Syria and Brazil. Yara sources P to produce granular and feed phosphates and NPK fertilizers.
- Potassium salts, or potash (K), which are mined from naturally occurring ore bodies that were formed as seawater evaporated. Yara sources mainly from countries with the largest deposits, such as Germany, Israel, Canada and Jordan.
- Logistics Services, particularly related to maritime logistics and transportation by road of some of the raw materials to our production units and deliveries of finished goods to the markets where we operate. Road transport services are provided by local service providers in the markets, whereas maritime logistics are mostly provided by globally operating suppliers.

Yara sources many other products and services, such as; other crop nutrients; technical equipment for our production facilities; maintenance services; professional services; IT services and equipment; personal protective equipment (PPE) and safety equipment for site personnel; and packaging materials.

### **3. Policies and commitments**

Yara supports the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights and the core conventions of the International Labor Organization (ILO). As a signatory to the United Nations Global Compact, Yara is firmly committed to its ten core principles, which cover human rights, labor rights, environment and anti-corruption.

Our key policy documents clearly state our commitment to living up to internationally recognized policies and principles. These policies apply to everyone working in and for Yara.

The key principles of Yara's compliance program are defined in the **Code of Conduct**, which outlines our position and commitments on a wide range of topics, and which expressly prohibits forced labor, child labor and human trafficking. The Code of Conduct applies to all Yara employees, whether full-time, part-time, permanent or temporary, and to the members of the Board of Directors. We are proud to say that the document is translated into 18 languages and distributed globally. Yara's Code of Conduct is reviewed annually and is approved by the Board of Directors.

The **Code of Conduct for Yara's Business Partners** considers internationally recognized and endorsed standards in key areas such as human rights, business ethics and labor conditions. Yara expects its Business Partners to uphold similar standards and to require the same from its own set of Business Partners, especially those that conduct business for Yara. The Code of Conduct for Yara's Business Partners shall be included in all material contracts.

Yara's **Sustainable Procurement Policy**, launched in June 2022, outlines how we intend to deliver sustainable value by promoting transparency and a higher standard of our suppliers' sustainability performance. It sets out a specific expectation on Yara's part that suppliers respect the United Nations Guiding Principles on Business and Human Rights and details how Yara will follow up on supplier sustainability compliance and performance management.

All policy documents are available on our website [www.yara.com](http://www.yara.com).

#### 4. Human Rights Due Diligence

Yara's approach to human rights due diligence follows the six steps and supporting measures set forth in the OECD Due Diligence Guidance for Responsible Business Conduct. The scope of our due diligence measures incorporates internationally recognized human rights, including child and forced labor.

Human rights is integrated in key policies and procedures, as well as in our Compliance Program and risk management processes. Our human rights and geopolitical risk assessments rank Yara's countries of operation, as well as countries from which we source raw materials, in terms of human rights risk exposure. This guides our focus on where to conduct targeted human rights impact assessments (HRIA), which is an integral part of meeting our due diligence obligations. HRIAs are performed by independent external subject matter experts in locations where our operations have the highest impact on human rights, and where our leverage to remedy is considered highest. Findings from HRIAs are presented to Executive Management and the Board of Directors. Mitigating actions remain a local management responsibility, and the Ethics and Compliance department monitors implementation and reports on progress.

Yara uses the Integrity Due Diligence (IDD) process along with our Sustainability Procurement Policy, Supplier Compliance Management Process (under implementation) and Supplier Audit Procedure to identify our human rights risk exposure and manage compliance in the value chain. In addition, we assess our suppliers' sustainability performance through EcoVadis, which includes human and labor rights topics.

The **IDD procedure** includes identifying human rights risk exposure in our supply chain. On a risk-basis, certain Business Partners are selected for additional follow-up, including in-depth due diligence work, training and other communications efforts. Depending on the matter, this is conducted by either the Ethics & Compliance department, other expert functions or the business line. Continued monitoring of business partner transactions is also part of the IDD procedure and consists of daily screening against sanctions and compliance databases as well as close cooperation between the business line and the Ethics and Compliance department. Compliance with the Code of Conduct for Yara's Business Partners is followed up by the business line, and by Procurement and HESQ functions.

**The Supplier Compliance Management (SCM) Process**, developed in 2022, defines the minimum criteria for the selection, qualification, and ongoing monitoring of suppliers. These criteria are aligned with the standards outlined in the Code of Conduct for Yara's Business Partners and the Sustainable Procurement Policy. Utilizing a risk-based approach, the SCM process aims to enable the Procurement teams to meet the escalating internal and external due diligence and reporting requirements. The full implementation of the process was not completed in 2023 due to competing priorities and resource constraints, but this remains a main priority for 2024.

The global **Supplier Audit procedure** and a corporate social audit program was established in 2023. Its primary objective is to guarantee that our suppliers comply with applicable laws and regulations and with Yara's requirements as outlined in the Code of Conduct for Business Partners, especially related to human rights and working conditions. The audits are conducted through documentation reviews, on-site inspections, and interviews. Its results must be communicated to the suppliers and be translated into corrective action plans, facilitating continuous improvement, and ensuring compliance in Yara's supply chain.

Compliance requirements, particularly related to anti-corruption and human rights, are integral to the part of the decision-making process for the assignment of capital for all of Yara's major investment activities. **Yara's Capital Value Process** includes clear compliance requirements for all projects covered by the policy, including due diligence activities and verification by the Ethics & Compliance department.

Our **Stakeholder Management Procedure** provides a structured approach to the way we consult, involve, and collaborate with stakeholders.

## 5. Actions

### 5.1 Risks of modern slavery in our operations and value chain

Yara does not consider any of its employees or contracted labor at our fully owned operations to be at significant risk of child or forced labor. However, we recognize that we are likely exposed to these risks in our value chain given our presence in countries where these issues are prevalent, the complexity of our value chain, and the high number of business partners. We are committed to continuously monitoring our risk exposure and potential impact and ensure that we have adequate systems in place to identify, mitigate and remediate where relevant.

The risk of modern slavery in Yara's operations typically increases in geographic areas without strong industrial relations laws and in circumstances where Yara subcontracts its workforce. For example, sectors with a traditionally transitory, highly casualized and/or subcontracted workforce like the construction industry, logistics or cleaning services, generally carry a higher risk of modern slavery, particularly when the people in these workforces are not engaged directly by Yara.

Work to further map human rights impacts and risks in our value chain, and to implement human rights considerations in our supplier compliance management process is ongoing. In 2023, an assessment of ESG risk factors within each of our procurement categories was enhanced as part of our planning phase for the 2024 supplier audits. This will continue in 2024.

### 5.2 Identified adverse human rights impacts

#### Human rights impact assessments

The 2023 country human rights risk assessment identified 24 high-risk countries, up from 17 in 2022. This guides our focus on where to conduct targeted human rights impact assessments (HRIAs).

Between 2019 and 2022 Yara has used external human rights experts to conduct HRIAs in India, the Philippines, Colombia, China, South Africa, Tanzania, Zambia, and Brazil. In 2023, our focus was on mitigating salient risks of adverse impacts consistently identified in HRIAs performed to date and performing internal audits to verify the implementation and effectiveness of agreed actions from previously conducted HRIAs in India, Colombia and Brazil.

The scope of the HRIAs has focused on Yara's sites, however, they have also identified risks in our supply chain, covering, for instance, third-party run warehouses and logistics providers. We recognize that contracted labor is a core driver of adverse human rights impacts for workers at Yara's sites and in our supply chain. Yara's ability and leverage to secure individual workers' labor rights, including fair wages, working hours, benefits, annual leave, work predictability, and a safe and healthy workplace free from discrimination is reduced when using contracted labor. Performing heavy manual labor is an additional health and safety risk when combined with high temperatures and humidity.

In 2021, HRIAs in Brazil were performed by external subject matter experts, covering operations and logistics to and from seven of our key sites. A severe finding was related to the risk of sexual exploitation of both adults and children in the trucking industry. Actions were implemented following the assessments and are continuously followed up and monitored.

We recognize that the risk of child labor and labor rights violations in the agricultural sector is prevalent, and we continuously work to improve our due diligence processes to identify and mitigate human rights impacts, and expect the same from our business partners.

### **Supplier audits**

In 2023, alongside the standard integrity due diligence questionnaire outlined in the Integrity Due Diligence process, we incorporated a dedicated focus on human rights and working conditions into the 6 supplier audits conducted in the corporate pilot program of Supplier Social Audits. Given the complexity of Yara's supply chain, we employed a risk-based approach to prioritize suppliers for social and human rights due diligence and audits. Suppliers were selected based on a combination of geopolitical and industry risks, along with their strategic importance to Yara's business. This approach will continue to guide the prioritization of social and human rights audits in 2024.

Sourcing partners and logistics suppliers were included in the 2023 audit plan. Key findings from the audits relate to the following areas:

- Working conditions for contracted labor, including hygienic facilities, eating- and resting areas, heat stress, and manual handling
- Lack of effective grievance mechanisms, including transparency around internal investigations and follow-up of grievances
- Lack of policies and processes covering all areas in Yara's Code of Conduct for Business Partners
- Inclusion of human rights and working conditions in supplier compliance management
- Lack of effective control of wages and working hours
- Contract letters are not always available in a language the workers can understand

All findings and improvement areas are discussed in full openness with our suppliers, along with possible actions or remediation efforts. Yara is committed to using our leverage to the best of our abilities to address any identified impacts.

In the planning phase for the 2024 supplier audits, we recognized the need to enhance our Industry Risk assessment, which is central in the selection and prioritization of suppliers. This exercise involved combining insights acquired from the 2023 audits with internal expertise and external resources. Consequently, procurement categories were linked to their respective industries and assessed for inherent ESG risks, resulting in a documented Industry Risk assessment comprising four pillars: Environment, Labor & Human Rights, Ethics, and Sustainable Procurement. The industry risk assessment served as valuable input for prioritizing suppliers to be audited in the upcoming year and will be further improved in 2024.

In 2024 audits will focus on the following industries; Mining, Road transport, Manufacture of plastics products and Construction.

No further significant breaches or human rights impacts related to modern slavery or child or forced labor were identified through our existing systems in 2023, either in our own operations nor in the value chain. There have been a limited number of incidents of underage workers accessing Yara sites through, for instance, distributors or other third-party service providers. Adequate systems are in place at the sites, though improvements have been implemented where relevant to prevent further occurrences. If a case of child labor is found in our operations, Yara will contribute to the transition from employment to education by, for example, collaborating with local communities and NGOs, providing suitable on the job training, or sponsoring educational opportunities.

## **6. Governance**

Yara's Ethics and Compliance Department has organizational responsibility to provide a best-in-class ethics and compliance program. The department plays a key role in the management of all risks related to corruption, fraud, human rights and Business Partner integrity. Ethics training of employees is among the key performance indicators (KPIs) followed by Yara's Board of Directors. The Ethics and Compliance department consists of 17 full-time employees, with a corporate team in Oslo supported by a network of Regional Compliance Managers. The Regional Compliance Managers are responsible for implementing Yara's Compliance Program, including providing training and giving guidance in their respective regions.

Ethics and compliance matters, including human rights, are regularly and formally discussed at the highest levels in the organization. The Chief Compliance Officer reports administratively to the Executive Vice President and General Counsel, twice annually to the Board of Directors, quarterly to the Board Audit and Sustainability Committee and monthly or as needed to the CEO on matters relating to ethics and compliance, including human rights.

Yara has a Compliance Committee, which is chaired by the CEO and attended by the members of Yara's Group Executive Board. The Compliance Committee meets quarterly and acts as a focal point for these topics.

Yara has established a Sustainability Network, which ensures that Yara has clearly established accountability, processes, and systems in place for our ESG policies and non-financial performance indicators. The Sustainability Network includes representatives from our corporate functions: Sustainability Governance, Health, Environment, Safety and Quality (HESQ), Human Resources, Ethics and Compliance, Communications and Brand, Global Climate and Energy, Enterprise Risk Management and Procurement.

## **7. Grievance and whistleblowing channels**

Yara's grievance channels help us identify and assess adverse human rights impacts. Many of Yara's production sites have established green lines or similar communication channels for neighbors and other stakeholders to call in questions, suggestions, or criticisms. Social media is also increasingly used to engage with local communities. Our local production units have systems in place to register and follow up complaints and other feedback from external stakeholders. Grievances related to our environmental performance are reported monthly to our central Corporate HESQ function. Several product quality complaint handling systems are also in place, each adapted to the various business models and operations throughout the world. Our country websites feature contact forms for anyone who wants to raise questions or provide feedback.

In 2023, we continued assessing the effectiveness of our grievance channels. Accessibility to grievance channels in local languages has been improved and awareness raising of grievance processes continues. Work to evaluate Yara's grievance channels against the UN Guiding Principles Effectiveness Criteria will be initiated in 2024.

Employees and Business Partners are expected to report suspected violations of the Code of Conduct, Yara's policies and procedures, or laws and regulations in our own operations and in our supply chain. For employees, the first point of contact should be the line manager. Alternatively, employees and external stakeholders may use the Ethics Hotline, available in 60 languages 24 hours a day, 7 days a week. Our website and intranet also feature an option to contact the Ethics and Compliance department directly at [ethics@yara.com](mailto:ethics@yara.com). Yara has an obligation to investigate all reports made, and all notifications are treated confidentially.

## **8. Training and awareness**

Human rights is included in all ethics and compliance training, including mandatory e-learning for new hires and face-to-face training programs. We also have additional e-learning modules covering topics from the Code of Conduct available to all Yara employees. This includes Ethical conduct and reporting concerns, with a specific section on Human rights, as well as a separate e-learning course, "Business and Human Rights", launched in 2022. The Ethics and Compliance training program is delivered by dedicated Regional Compliance Managers.

In 2023, more than 4600 employees received 'face-to-face' training in ethics and compliance related matters, including human rights as a distinct topic. Yara's Human Rights Policy is included in our Code of Conduct. All employees receive regular training on the Code of Conduct. In 2023, 711 employees received specific human rights training, and the e-learning on Business and Human Rights has been completed by 224 employees. Through Yara's Integrity Due Diligence (IDD) process, the Code of Conduct for Business Partners was communicated to close to 1,500 business partners during 2023.

We will continue to improve our work on raising awareness on human rights in our organization through trainings, e-learning, communication, and knowledge sharing. Capacity building and awareness raising within the Procurement function continues to be a priority in 2024. Ongoing activities, such as integrity due diligence and maintenance of grievance channels, will continue as usual.

## **9. Assessing effectiveness**

Yara International ASA has a dedicated Ethics & Compliance team to address the identification of human rights risks, including modern slavery, child labor and human trafficking at group level. The effectiveness of the Compliance Program is evaluated annually in the business plan process and an annual maturity assessment of the program is presented to the Board of Directors. Policies and procedures follow the established renewal cycle of three years on the Yara Steering System.

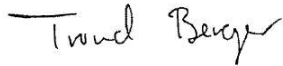
The Code of Conduct was reviewed according to established process and updated in 2023, valid from 1 January 2024. This includes the chapter on human rights in the Code of Conduct, which is approved by the Yara CEO and Board of Directors. The current version includes an update to the Hospitality, Gifts and Expenses chapter, which was shortened and offered some clarifications following staff questions throughout the year. In June 2023, Yara also launched a revised mandatory Code of Conduct e-learning course. No material changes to the Code of Conduct for Yara's Business Partners were made in 2023.

Where the risk of adverse human rights impacts from our operations has been identified, action plans are developed and regularly followed up until completion. In 2023, we conducted internal audits to verify the implementation of agreed actions from previously conducted HRIAs in India, Colombia and Brazil. The aim was to assess whether implemented actions have led to intended results. The audits showed that while most of the agreed actions have been implemented, some lack in effectiveness and some new issues were identified. Findings from the internal audits will be followed up and monitored until closure.


This highlights the importance of continued focus on measuring results and impacts from actions implemented to ensure actual improvements on human rights. A process to ensure continuous monitoring and adequacy of actions following HRIAs will be developed in 2024. We also continue to monitor the overall human rights risk exposure as part of our geopolitical risk assessment.

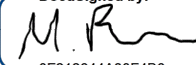
We continue our focus on salient risks of negative impacts consistently identified in HRIAs performed to date. Global initiatives to eliminate or minimize possible negative impact from Yara's operations on affected rights-holders' human rights are our main priority.

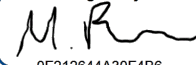
More information about our Sustainability and Human Rights performance can be found in Yara's 2023 Integrated Report, available on [yara.com](https://yara.com).



**Trond Berger, Chairman of the Board**  
**Yara International ASA**

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**Chairperson of the Board**  
**Yara Pilbara Nitrates Pty Ltd**

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**Yara UK Limited**

**Yara Belle Plaine Inc.**

"In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above."

- Full name: Aaron Bourque

- Title: Plant Manager
- Date: 29 April 2024
- Signature:


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"I have the authority to bind 'Yara Belle Plaine Inc.'"

#### Yara Canada Inc.

"In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above."

- Full name: Bruce Hope
- Title: VP Operational Excellence Americas
- Date: 29 April 2024
- Signature:

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"I have the authority to bind 'Yara Canada Inc.'"

#### Yara North America Inc.

"In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above."

- Full name: Geraldo Mattioli
- Title: SVP North America
- Date: 29 April 2024
- Signature:

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"I have the authority to bind 'Yara North America Inc.'"