



Modern slavery  
statement 2023



## A message from our Chief Executive Officer



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

Viterra continued to make advancements in our approach to addressing human rights and modern slavery risks in 2023.

Through our code of conduct and policies, we clearly set our expectations in upholding human rights to everyone in our business, and this year extended those expectations to our supply chain, with the publication of our supplier code of conduct.

Our supplier code of conduct reinforces to our customers and other stakeholders the value we place on operating sustainably through our network, improves transparency and ensures we can take the necessary steps to ensure the suppliers we work with uphold the same principles as Viterra. When implementing the code, we are taking a risk-based approach.

Working with external partners, in 2023 we carried out an environmental, social and governance (ESG) risk analysis and updated our human rights risk assessment across our operations and supply chain.

The human rights risk assessment provided some recommendations for us to implement, which we have started actioning in 2024.

In 2023, we also continued to look at how we currently address modern slavery risks and ensure our employees, contractors and suppliers understand our zero tolerance to modern slavery in any form, including making enhancements to our code of conduct training and due diligence procedures.

Throughout supply constraints and demand fluctuations in 2023, Viterra's global agriculture network continued to ensure the reliable and sustainable supply of critical food and feed products around the world.

2023 provided opportunity for Viterra to demonstrate the true strength and resilience of our network. In a year characterised by geo-political, logistical and environmental challenges, we closed with record annual sales volumes.

However, we need to be sure this fantastic achievement by our colleagues to meet the increased demand for essential agricultural goods is not met at the expense of people, our communities or the environment.

Viterra is pleased to share our 2023 modern slavery statement which outlines our approach to mitigate the risks of modern slavery in our business operations and supply chains and supports our commitment to transparency.

This statement was approved by our global executive and board of directors of Viterra Limited (the parent company for the Viterra group) by 24 May 2024.

I attest that I have reviewed the information contained in the report for the entity or entities listed [on page 3](#). Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the reporting year listed above.

**David Mattiske**  
Chief Executive Officer

24 May 2024

I have the authority to bind Viterra.

## 2023 highlights

- We had no reported human rights concerns, including modern slavery, through our channels
- We published and rolled out our supplier code of conduct to all regions
- We carried out an external human rights risk assessment

# Contents

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

## About this statement and our structure

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

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

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

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

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

Reporting entities incorporated in Australia:

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

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

Reporting entities incorporated in the United Kingdom:

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

Reporting entities incorporated in Canada:

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

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

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

This statement was approved by our global executive and board of directors of Viterra Limited (the parent company for the Viterra group) by 24 May, and is signed on its behalf by:

David Mattiske  
Chief Executive Officer

I have the authority to bind Viterra.

## How we have addressed the criteria

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

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

## Who we are

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

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

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

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

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

## Our values

### 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 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 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 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.

### 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.

## Our governance structure

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

### Governance and accountability

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

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

### Strengthening our governance

We have established a board ESG committee to ensure we operate in an openly sustainable, ethical and responsible manner, and manage our health and safety, environmental, community and human rights risks effectively.

Our approach is underpinned by a robust organisational structure that ensures our standards meet or exceed legal requirements and address material risk. Our global steering committees oversee the development of company-wide policy and programmes, with regional management teams leading the local implementation. We monitor our performance closely at every level of the business.

### Board of directors

Oversight and regular performance communication



### Board ESG committee

ESG and climate risk focus



### Global sustainability committee

CEO, CFO, global sustainability & HR functions



### Global steering committees

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



### Regional CEOs, sustainability leads and global forums

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



# Our operations and supply chain




We take great pride in supplying essential food and feed products to the world. Our agricultural network spans 38 countries, drawing on our close relationships with producers and end use customers, connecting them to provide traceable and sustainable agricultural commodities.

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

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

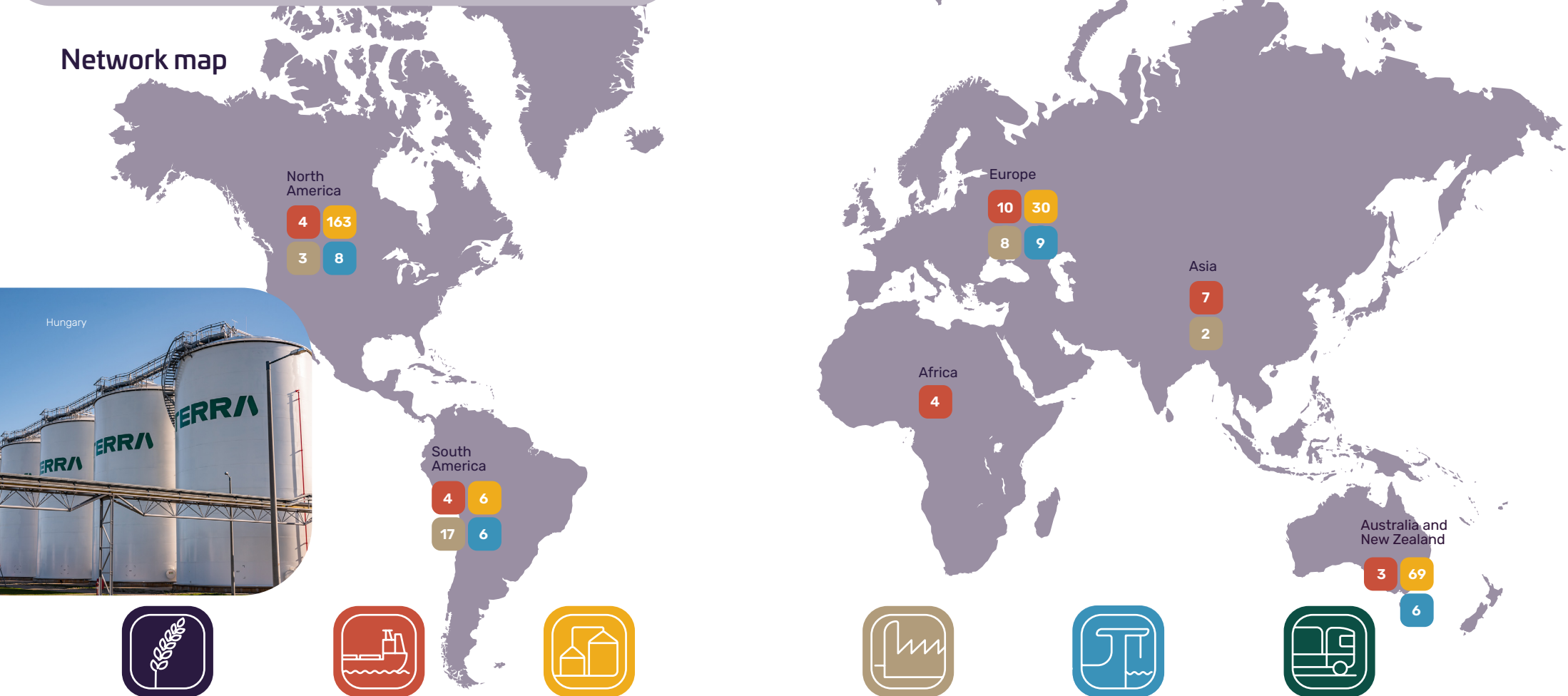
Through our global chartering operations, we provide vessel transportation for a wide range of agricultural commodities. Our extensive fleet of vessels transports to hundreds of ports around the world annually.

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

	Core commodities	Sourced from	Exported to	Main use
 <p><b>Grains</b></p> <p>75.9 mMT 20 marketing sales volume in 2023 commodities handled in 2023</p>	<ul style="list-style-type: none"> <li>Wheat</li> <li>Barley</li> <li>Pulses</li> <li>Corn</li> </ul>	<ul style="list-style-type: none"> <li>Europe</li> <li>Canada</li> <li>United States</li> <li>South America</li> <li>Australia</li> </ul>	<ul style="list-style-type: none"> <li>China</li> <li>Southern Europe</li> <li>South East Asia</li> <li>Middle East</li> </ul>	<ul style="list-style-type: none"> <li>Milling</li> <li>Malting</li> <li>Animal feed</li> <li>Biofuels</li> <li>Human consumption</li> </ul>
 <p><b>Oilseeds</b></p> <p>47.8 mMT 22 marketing sales volume in 2023 commodities handled in 2023</p>	<ul style="list-style-type: none"> <li>Soybean</li> <li>Sunseed</li> <li>Rapeseed</li> <li>Meals and oils</li> <li>Biodiesel</li> </ul>	<ul style="list-style-type: none"> <li>Canada</li> <li>United States</li> <li>Australia</li> <li>South America</li> <li>Europe</li> </ul>	<ul style="list-style-type: none"> <li>China</li> <li>South East Asia</li> <li>Australia</li> <li>Europe</li> </ul>	<ul style="list-style-type: none"> <li>Crushing</li> <li>Human consumption</li> <li>Animal feed</li> <li>Biofuels</li> <li>Fuel blending</li> </ul>
 <p><b>Other</b></p> <p>3 mMT 2 marketing sales volume in 2023 commodities handled in 2023</p>	<ul style="list-style-type: none"> <li>Cotton</li> <li>Sugar</li> </ul>	<ul style="list-style-type: none"> <li>Australia</li> <li>Brazil</li> <li>West Africa</li> <li>India</li> <li>United States</li> </ul>	<ul style="list-style-type: none"> <li>Vietnam</li> <li>India</li> <li>Bangladesh</li> <li>Indonesia</li> <li>China</li> <li>Middle East</li> </ul>	<ul style="list-style-type: none"> <li>Human consumption</li> <li>Textiles</li> </ul>

# Our operations and supply chain

## Network map



### Origination

We source directly from producers and producer cooperatives from all the main growing regions in the world.

Site numbers reflect our 2023 full-year report.



### Marketing

With our insight, experience, network and strong producer relationships, we originate agricultural commodities and supply them to customers worldwide.

**127m**  
tonnes of  
commodities  
marketed in 2023

marketing  
offices in  
**30**  
countries



### Storage and handling

We have storage and handling facilities in key growing regions to ensure products are available when customers need them.

**265+**  
storage facilities in  
**15**  
countries



### Processing and refining

We own a range of facilities that enable us to provide commodities ready for consumer use.

**30+**  
processing and  
refining facilities in  
**11**  
countries



### Port terminals

Our network of port terminals in the main exporting countries ships to destinations around the world.

**29**  
port terminals in  
**10**  
countries



### Logistics

Our comprehensive logistics network allows us to oversee our commodities from farm gate to customer.

**1,494**  
ocean freight voyages  
**200+**  
ocean-going vessels

# Risks of modern slavery practices

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

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

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

## ESG risk analysis

In 2023, Viterra received our first public ESG assessment conducted by Morningstar Sustainalytics.

We achieved a rating of 24.6\*, placing us within the top five of more the 100 agriculture companies assessed.

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

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

\*Viterra's ESG rating has been updated to 24.7 per 2024 risk rating report



## Human rights risk assessment

In 2023, we continued our human rights due diligence as specified in the UN guiding principle 17. This process included assessing potential human rights risks within our supply chain, acting on the findings and communicating these and tracking responses.

We engaged an external provider to refresh our human rights risk assessment. This covered the current human rights risks within our operations and supply chain, our human rights governance structure and human rights policy, and identifying areas needing policy developments or further actions, specifically in areas such as child labour, modern slavery and forced labour. The assessment was undertaken in the last half of 2023.

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

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

- strengthening governance with implementation of a cross-functional human rights working group
- integrating further human rights screening into our know your counterparty screening tool with a targeted approach prioritising high risk countries
- developing modern slavery training and continuing to raise its awareness across Viterra
- reviewing the recommendations on changes to our human rights policies and procedures and how best to implement them to ensure effectiveness.

# Actions and due diligence to address modern slavery risks

Our approach to identifying and addressing modern slavery risks includes:

- our code of conduct and policies
- implementation, training and awareness
- 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 signed off before being published/rolled out.

Policy or document	Relevance to modern slavery	How it is available
<b>Statement of values</b>	<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> <p><a href="#">View</a></p>
<b>Code of conduct</b>	<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> <p><a href="#">View</a></p>
<b>Human rights policy</b>	<p>Our human rights policy applies to all Viterra employees and contractors and states our fundamental commitment to respect human rights consistent with the UN Universal Declaration of Human Rights.</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> <p><a href="#">View</a></p>

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

# Actions and due diligence to address modern slavery risks

## Implementation, training and awareness

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

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

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

### Code of conduct training

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

In 2023, we enhanced our code of conduct training to include a human rights section to increase employees' awareness of this important topic and assess their understanding of how to raise a human rights concern should they see one.

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

We operate grievance mechanisms for our stakeholders throughout our operations to raise issues.

### 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 as per ILO standards in our workplace or along our supply chains.

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

## Raising concerns

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

They may raise the concern with their supervisor or manager, an appropriate manager from another department, their local compliance contact or by utilising our [raising concerns programme](#).

## Supplier code of conduct implementation

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

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

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

## Sustainability report

We publish an annual sustainability report which details our commitment and progress in our people, health and safety, environment, community, human rights and food and feed safety.

It is based on the material topics identified for our business and supply chains, including human rights, and our strategic objective of improving our transparency and ESG credentials.

# 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 identify and report human rights breaches including modern slavery through our mechanisms.

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

### Raising Concerns programme

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

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

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

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

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

There were 52 concerns raised through our Raising Concerns platform in 2023 and investigated by our compliance team, none of which were modern slavery or human rights related.

## Know your counterparty procedure

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

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

In Australia, we expanded our procedure during 2023 to enhance customer screening.

Following successful trials, we have also rolled out an automated screening platform in our Rotterdam, Netherlands office. Automating the process makes this important screening step quicker and simpler to do. We are looking to roll out this new platform to more regions in 2024, including Canada.

We are also working to integrate greater human rights screening into our screening system following the recommendations of our [human rights assessment](#).

## Supplier due diligence in our soy supply chains

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

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

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



# Actions and due diligence to address modern slavery risks

## International Sustainability and Carbon Certification (ISCC)

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

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

## Monthly internal management reporting

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

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

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

## Collaboration and stakeholder engagement

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

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

We are focused on ensuring our suppliers understand our zero tolerance policy on human rights and modern slavery breaches. [Our newly released supplier code of conduct](#) defines our expectations.

We have continued adding modern slavery clauses to local contracts.

We evidence our commitment through our participation in international conventions, including the United Nations Global Compact, a set of principles covering human rights, labour, environment and anti-corruption and the standards set out by the International Labour Organization (ILO).

Viterra is a member of many organisations and standards organisations providing opportunities for shared learnings and valuable insights to inform our response to modern slavery and broader human rights issues.

We worked or collaborated with the following organisations during 2023:

### United Nations Global Compact (UNGC)

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

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

This includes:

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

Target 8.7 – Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.



# Actions and due diligence to address modern slavery risks

## 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.

## Better Cotton Initiative (BCI)

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

## Cotton made in Africa (CmiA)

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

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

## Roundtable on Sustainable Palm Oil (RSPO)

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

## Bonsucro

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



## Assessing the effectiveness of our actions

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

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

Though we had no reported breaches in 2023 through our various channels, we continue to develop our approach to potential modern slavery risks identified.

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

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

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



# 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.

No statement in this document is intended as a profit forecast or a profit estimate. This document does not constitute or form part of any offer or invitation to sell or issue, or any solicitation of any offer to purchase or subscribe for any securities. The making of this document does not constitute a recommendation regarding any securities.

The companies in which Viterra Limited 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 Limited 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.

Viterra Limited, 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) and Viterra Canada Inc (incorporated in Canada). 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, with the Australian Modern Slavery Act 2018, with regards to the Australian incorporated legal entities and their operations and with the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act with regards to the Canadian incorporated legal entity and its operations.

## Contact

Viterra  
Blaak 31, 3011 GA Rotterdam,  
Netherlands  
PO Box 1120, 3000 BC Rotterdam

T: +31 10 4044 400

F: +31 10 4129 635

info@viterra.com



Bringing producers  
and consumers together  
in a **world-leading  
agriculture network**

→ Find out more at  
[viterra.com](https://viterra.com)