

Supplier code of conduct





Our business is a diverse network operating across a range of geographies, commodities and assets.

We provide one of the world's leading agriculture networks, connecting producers with consumers and supplying sustainable, traceable and quality controlled agricultural products.

Our suppliers are critical partners in what we do and in our commitment to ethical business practices, health and safety, food and feed safety, labour and human rights, the environment and local communities in which we operate.

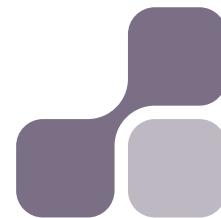
Purpose

This supplier code of conduct details the expectations we have for our suppliers and is 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.

Scope

Viterra's supplier code of conduct applies to our suppliers within all our supply chains, including the farms and plantations from which our commodities are sourced. We expect our direct suppliers to ensure their suppliers are compliant with the expectations set out in this supplier code of conduct and aim to fulfil due diligence towards their suppliers as described in this document.

For the purposes of this supplier code of conduct, a supplier is any individual, organisation or company that provides, sells or leases materials, products or services directly to any company within the Viterra corporate group.



Supplier code of conduct

Viterra expects this supplier code of conduct to be referenced in relevant supplier contracts. In addition, Viterra expects all suppliers maintain agreed standards of quality and timeliness of delivery. All suppliers working on a Viterra site must also comply with site-specific requirements.

As an agriculture network, one Viterra business may supply products or services to another Viterra business. Viterra adheres to its code of conduct and policies which in turn meet the expectations of this supplier code of conduct.

We reserve the right to review and update this supplier code of conduct when deemed necessary. The most recent version is available on our website.

Where appropriate, this supplier code of conduct must be supported through communication, training and/or contractual arrangements.

Where reasonable and appropriate Viterra may assist a supplier who does not comply with the standards set out in this code of conduct. They may be given the opportunity to propose and implement a corrective action plan. We may choose to suspend or discontinue a business relationship with a supplier who does not comply with the standards set out in this supplier code of conduct, especially if such supplier is unwilling to cooperate.

Our supplier code of conduct applies across six separate areas:

1. Ethical business practices

We are committed to operating in accordance with strong ethical principles, as detailed in our code of conduct, and expect our suppliers to take responsibility for ensuring their conduct conforms to these principles.

We expect our suppliers to:

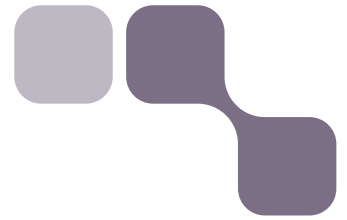
- comply with all applicable laws and regulations, including requirements relating to:
 - o anti-corruption;
 - o fair competition and market integrity;
 - o sanctions and trade controls;
 - o anti-money laundering; and
 - o preventing criminal tax evasion.
- not solicit, accept, offer, provide or authorise bribes of any kind, either directly or indirectly;
- avoid conflict of interests with their obligations to Viterra and take steps to declare and manage any conflicts, including in respect of their employees; and
- have appropriate controls to ensure compliance with the above requirements.

2. Health and safety

The health and safety of everyone involved in our business is our highest priority. We aim to be an industry leader in health and safety outcomes. We expect everybody to actively maintain a safe and healthy workplace, and promote a culture where people take responsibility for their own safety and for that of their colleagues and communities.

We expect our suppliers to:

- comply with all applicable laws and regulations to ensure safe and healthy work places;
- provide access to (emergency) healthcare;
- provide a safe working environment, including appropriate personal protective equipment and access to clean water and sanitation;
- provide regular health and safety training to their workforce; and
- have appropriate controls protecting the safety and health of their workforce.



3. Food and feed safety

We have detailed management policies and programmes that ensure our food and feed products are safe. Our supply chains are considered essential services to safely transport food and feed products for communities around the world.

We expect our suppliers to:

- have appropriate controls in place that ensure the safety of products meets legal, contractual and regulatory requirements; and
- maintain high standards of quality and food and feed safety to meet customers' needs.

4. Labour and human rights

We respect the dignity, liberty and equality of everyone we work with and of those in the communities in which we operate and from which we source our products. We ensure that human rights awareness is embedded in our internal risk assessment processes.

We support and respect human rights in a manner consistent with the Universal Declaration of Human Rights.

Across all our assets and offices, we comply with standards set by the International Labour Organization (ILO), the UN Global Compact and the UN Guiding Principles. We expect our suppliers to respect the ILO Core Labour Standards to treat their workforce fairly and with respect.

We expect our suppliers to:

- respect and comply with human rights and the United Nations Guiding Principles demonstrated by controls and processes appropriate to their circumstances;
- where appropriate, align security management practices with The Voluntary Principles on Security and Human Rights;
- respect workforce rights to lawful freedom of association and collective bargaining;
- have zero tolerance for any form of modern slavery, including forced, compulsory or child labour as per ILO standards;
- prohibit all forms of discrimination based on race, nationality, religion, gender, age, sexual orientation, disability, ancestry, social origin, trade union membership or any other potential bias;
- pay at least minimum wage and fair remuneration, and offer fair working hours and conditions; and
- have appropriate controls protecting the labour rights of their workforce and supply chains.



5. Environment

We aim to positively impact the environment wherever we operate and achieve environmental sustainability along our supply chains. We recognise the need for the sustainable supply of agricultural products for the increasing food, feed and renewable fuel demands of a growing global population.

We expect our suppliers to:

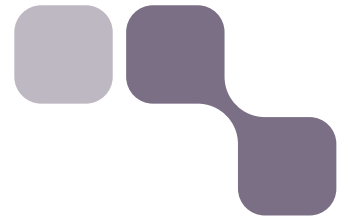
- comply with all applicable laws and regulations to protect the environment;
- make a commitment to eradicating conversion of natural ecosystems and no deforestation, burning of forests, development on High Conservation Value (HCV) areas, development on High Carbon Stock (HCS) areas and planting on peat on any depth;
- maintain all legally required environmental permits, licenses, approvals and other certifications;
- improve their efficiency of energy, water and natural resource usage;
- responsibly manage their air emissions, water quality and handling of hazardous materials; and
- have appropriate controls to effectively manage compliance with environmental requirements.

6. Communities

We support the sustainable, long term development of the local communities in which we operate. We contribute to these communities by employing people, purchasing commodities, goods and services, paying taxes – and through continued investment in our infrastructure.

When present in our host communities, we expect our suppliers to:

- treat members of the community with dignity and respect;
- have zero tolerance for activities such as threatening behaviour, violence, coercion, sexual exploitation or abuse; and
- respect the land tenure rights of indigenous people and vulnerable communities and adhere to the principle of Free, Prior and Informed Consent (FPIC) (this includes but is not limited to respecting legal and customary land rights and prevention of land grabbing activities).



Due diligence and corrective action

We undertake, and communicate on, appropriate due diligence of our current and potential suppliers, using a risk-based approach.

We conduct risk assessments of our suppliers during pre-qualification, the tendering process, or at the renewal of an existing contract term. Suppliers are expected to cooperate in the investigation and assessment of potential or adverse impacts found during the assessment and to provide Viterra access to relevant information on reasonable request.

If an unacceptable level of risk is identified, we will work with the supplier to determine appropriate corrective action. The corrective action will be monitored by Viterra and the affected supplier until both parties agree the desired outcome has been achieved. Subject only to contract commitments which are legally binding and cannot be terminated, at all times we reserve the right to suspend, discontinue or terminate our business relationship with a supplier when we have reason to suspect or can identify that the supplier:

- is in breach of applicable law; or
- refuses or fails to demonstrate reasonable and timely efforts to implement agreed corrective actions that we determine are required to operate in accordance with this supplier code of conduct.

We recognise local circumstances and conditions may sometimes pose potential challenges for complying with this supplier code of conduct. When appropriate, we will seek to support our suppliers in capacity building and improving their adherence to the expectations set out. We encourage our suppliers to share and apply the expectations detailed in this supplier code of conduct with their own supply chain and exercise due diligence on the materials, products and services supplied to Viterra and its subsidiaries. We recommend due diligence policies and management systems are aligned with standards, such as the OECD Due Diligence Guidance for Responsible Business Conduct. We encourage our suppliers to ensure their workforce and associated communities have access to grievance mechanisms to confidentially raise any concerns without fear of retaliation.

Speaking openly

At Viterra, we are committed to creating a culture where everyone feels free to speak openly about concerns in a secure and confidential way. This includes employees and contractors working in our offices and assets as well as third parties such as suppliers or other stakeholders.

We encourage everyone to report concerns regarding conduct that potentially breaches our code of conduct and its underlying policies, including this supplier code of conduct, with a Viterra supervisor or manager, or with a local Viterra procurement contact at the relevant office or asset. If a concern remains unresolved or a reporter feels uncomfortable using the local channels, they may refer to the Raising Concerns programme to submit the matter.

The Raising Concerns programme provides different contact options and considers local conditions, languages and ease of use. It can be accessed at <https://viterra.raisingconcerns.org/>.

We have zero tolerance for retaliation against anyone who raises concerns about conduct they believe does not comply with our code of conduct, supplier code of conduct or policies, even if the concern is not substantiated.



Assistance for suppliers

The following resources support this supplier code of conduct and are available on the Vitterra website:

- Our values
- Code of conduct
- Human rights policy
- Modern slavery statement
- Health, safety, environment and community policy
- Global anti-corruption policy
- Soy sustainability policy for South America
- Group tax policy

Selected reference standards

- International Labour Organization Declaration on Fundamental Principles and Rights at Work
- OECD Due Diligence Guidance for Responsible Business Conduct
- United Nations Guiding Principles on Business and Human Rights
- United Nations Global Compact
- Voluntary Principles on Security and Human Rights

→ Find out more at
viterro.com