

Modern Slavery Act Transparency Statement

Introduction

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Nutreco and its divisions Trouw and Skretting during the year ending 1 October 2021 to prevent modern slavery and human trafficking in its business and supply chains.

General

Feeding the world's growing population in a sustainable way is our purpose. To feed the global population in 2050 we need to create a sustainable protein system that provides fair and equal opportunities within our supply chain.

Nutreco is a global company with production plants in 37 countries and over 12.000 employees. We are committed to corporate social responsibility and foster a culture with respect for dignity and human rights as well as high ethical standards in the conduct of our business. Nutreco is fully opposed to any abuses of a person's freedoms and rights in our direct operations and our indirect operations, including our supply chain.

Our approach, policies and procedures

While we have full control over our own operations, the challenge for companies that operate in a global and complex supply chain, is to engage with suppliers to ensure they adhere to the same standards.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. Policies are developed by subject matter experts and signed off by group functional heads and approved at director level.

These policies include:

1. [Code of Conduct Business Partners](#): This Code was launched and rolled out in 2013 and has been updated in 2021, all suppliers and business partners are required to adhere to it. It contains the basic principles of what we expect from both Nutreco's direct and indirect suppliers and the minimum legal and ethical requirements they need to meet. It enables us to engage with our suppliers on material sustainability issues relating to their operations, and to set minimum criteria that should be met.
2. The Nutreco Code of Conduct: This Code, fully revised in 2019, provides our standards for business and personal conduct. It applies to all employees of Nutreco worldwide, regardless of their job and seniority level. It has been translated into 20 languages and can be found on our internal SharePoint, Nutranet, and on our website. The dedicated e-learning is mandatory for all employees with system access and new hires sign for acceptance and abidance by its rules.
3. Recruitment Policy: We operate a robust recruitment policy and conduct eligibility evaluations, designed to safeguard against human trafficking (or individuals being forced to work against their will) by ensuring that all Nutreco's employees are working free of will for Nutreco.

4. Whistleblowing Policy: This measure instils a culture whereby all employees feel free to raise concerns about how colleagues are being treated or in connection with practices within our business or supply chain, without fear of reprisals. Concerns can be raised via Speak Up, the central whistleblower program of SHV. Information on Speak Up can be found on special display boards in almost all of our locations. Employees can reach Speak Up online (www.shvspeakup.com) or by telephone using the toll-free national number. Reports can be made by name or anonymously. Speak Up also allows third parties to share their concerns.

Suppliers

Nutreco has an ongoing commitment to engaging only those suppliers that uphold the same principles as we do and, where necessary, ensure the implementation of corrective measures.

As stated by our Code of Conduct for Business Partners, our suppliers shall:

- Not engage in child labour;
- Apply wages and working time that shall, as a minimum, comply with all applicable laws and regulations, including minimum wage, overtime and maximum hours in the country concerned;
- Support equal opportunities and fight discrimination at the workplace;
- Not use prison, indentured, or bonded labour, or use corporal punishment or other forms of mental and physical coercion as a form of discipline; and
- Respect and support the free association of labour and employee rights to join a trade union where allowable by law.

Regarding labour practices, our suppliers shall:

- Provide safe and healthy working conditions for its employees;
- Have a Health & Safety Policy that is freely available for all employees to access at any time, if and to the extent required under local laws; and
- Demonstrate compliance with the Health & Safety policies and continuously strive to minimize accidents and risks

All of our new suppliers receive an email by the person onboarding that supplier that states “by engaging into business with Skretting / Trouw Nutrition / Nutreco you accept and comply with this Code of Conduct for Business Partners.

Compliance Audits

Once a supplier has committed to our Code of Conduct, the next step is to validate their commitment. We have developed a monitoring program to ensure continued compliance. This program started in 2014 with the installation of a credible supplier sustainability audit platform that allows for active exchange between buyers and suppliers on continued improvement. We also completed an audit manual, which has been reviewed by an external organisation specialised in responsible sourcing.