

Human Rights Policy

Nufarm Limited (Company or Nufarm)
ACN 091 323 312

Adopted by the Board on 14 July 2021

Human Rights Policy

1. Purpose

Human rights are the basic political, civil, economic, labour, social and cultural rights and freedoms to which all people are entitled, without discrimination¹ (**Human Rights**).

This policy is the Nufarm Group's (**Nufarm**) commitment to the protection of Human Rights in our business, supply chain and communities and along with the Code of Conduct, sets out Nufarm's expectations of its employees, officers, employees, contractors, distributors, and suppliers (**People**).

2. Scope

This policy applies to all Nufarm subsidiaries and its People.

3. Commitment

Nufarm is committed to providing a work environment where Human Rights are respected and upheld. We expect the same commitment from all parties that we do business with.

We believe that respecting Human Rights in all that we do is integral to the sustainability and success of our business because employees and communities who act with integrity contribute to a more stable and profitable business.

3.1. Safety and Security

The safety of our employees is Nufarm's first priority and we are working to a goal of zero harm; Nufarm's Health, Safety and Environment policy is available on our corporate website

Harassment, violence, or the threat of violence is not tolerated in our workplaces.

3.2. Freedom of Association and Collective Bargaining

Nufarm recognises and respects employee's rights and freedom to join or not to join organisations of their own choosing, to associate freely and bargain collectively. No employee shall be subject to dismissal, discrimination, harassment, intimidation or retaliation due to their membership in a lawful workers' association or union.

Where the right to freedom of association and collective bargaining is restricted by law, Nufarm shall facilitate open communication and direct engagement between workers and management.

¹ Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights.

3.3. Diversity and Inclusion

We are committed to developing and maintaining a diverse and inclusive workplace where every employee is treated fairly and with respect and has the opportunity to realise their full potential and contribute to Nufarm's success.

For more information, please refer to our Diversity and Inclusion Policy on our corporate website.

3.4. Equal Opportunity

Nufarm will take reasonable measures to ensure equal opportunities for all employees.

Employment related decisions, including recruitment, promotion, training and development; compensation, disciplinary and termination of employment will be based on merit (work performance, qualifications, capability, knowledge and experience) and business considerations. Decisions based on attributes unrelated to job performance, including but not limited to race, gender, sexuality or family responsibilities, will not be tolerated.

Nufarm acts in accordance with local legislation and cultural considerations that may impact workplace decisions and actions.

3.5. Modern Slavery

Modern slavery can take many forms; child labour, forced labour, servitude, slavery, human trafficking and bonded or indentured labour. Nufarm recognises that depriving another individual of their liberty is a violation of the individual's fundamental human rights and has adopted a zero-tolerance approach to the practice of modern slavery.

Nufarm commits to:

- Employing workers who have freely given their consent to employment, who are of a legal age and status to work; and
- To undertake business with suppliers and contractors who share this goal.

4. Actions to enforce our commitment

Nufarm is committed to ensuring it acts in accordance with upholding Human Rights and the requirements of this Policy, by providing a clear directive to its suppliers and following up with globally recognised assessments.

Nufarm's selection and evaluation process of its suppliers is governed by a [Supplier Global Code of Conduct](#) (Supplier Code), which is supported by a Corporate Social Responsibility assessment tool provided by Ecovadis.

The Supplier Code provides guidance to our suppliers about our expectations regarding ethical and responsible behaviour when conducting business together, including adherence to Human Rights.

Nufarm engages EcoVadis to undertake corporate social responsibility ratings of its suppliers, in accordance with a risk priority assessment by Nufarm. This includes an assessment of human rights adherence.

Nufarm also conducts internal reviews on human rights adherence.

5. Training and communication

Our employees will be educated in Nufarm's expectations of them under this policy. This policy shall be published on both our corporate internet site and internal intranet site, the Vine.

6. Raising a concern

Nufarm's [Whistleblower Policy](#) sets out the way People can confidently and if they wish, anonymously, report improper misconduct, wrongdoing, or improper conduct.

Employees may also access the [Integrity Helpline online](#) or [over the phone](#).

7. Responsibilities

The Chief Executive Officer is responsible for reporting on human rights performance in the annual reports.

The Nominations and Governance Committee of the Nufarm Board shall review of the effectiveness of this policy annually.

The Group Executive – People and Performance is responsible for the timely communication, training and deployment of this policy.

It is the responsibility of all senior managers to ensure the requirements of this policy are implemented within their teams.

All employees are required to practice and promote the values of this policy and take reasonable measures to prevent the exploitation of other people.

8. Policy compliance

- a) Actions prohibited by this policy involving:
 - i) officers or any member of the Nufarm Leadership Team (NLT), regardless of the type of breach of this policy;
 - ii) a breach of this policy by any Officer or employee that is a criminal act; or
 - iii) repeated breaches of this policy by an employee or business unit that likely establishes a systemic issue;

(each a Material Breach), must be reported to the Risk and Compliance Committee.
- b) Actions prohibited by this policy involving any other person or non-criminal incident, must be

reported to the reporting person's manager and the Group General Counsel and Company Secretary.

- c) After receiving a report of an alleged prohibited action, the Risk and Compliance Committee, the relevant manager or Group General Counsel and Company Secretary must consider the most appropriate policy and process that may apply to the alleged prohibited action and promptly take all appropriate actions necessary to investigate in accordance with the appropriate policy.
- d) All individuals are expected to cooperate in any internal investigation of an alleged prohibited action.
- e) Any person being investigated for breach of this policy will be dealt with fairly and in accordance with local Disciplinary and Grievance Policies.
- f) In the event of criminal conduct or other serious violations of the law, the appropriate governmental authorities will be notified.
- g) Nufarm does not tolerate acts of retaliation or victimisation, including demotion, dismissal, discipline, discrimination, harassment, suspension or threats, of or against any individual who makes a good faith report of known or suspected violations of this policy. This is consistent with Nufarm's Whistleblower Policy - Nufarm is committed to the protection of Whistleblowers against action taken in reprisal for making reports. Any acts of retaliation will be dealt with utilising local Disciplinary and Grievance Policies and with due regard to the Whistleblower Policy.

9. Policy review

This policy will be reviewed and updated as required periodically.