

# Global Procurement Supplier Code of Conduct Policy



# Table of Contents

<b>A message from our CEO</b>	<b>3</b>
<b>1. Introductions</b>	<b>4</b>
<b>2. Operating Lawfully</b>	<b>4</b>
<b>3. Health and Safety</b>	<b>5</b>
<b>4. Integrity and Ethics</b>	<b>5</b>
<b>5. Human Rights</b>	<b>6</b>
<b>6. Sustainability and the Environment</b>	<b>7</b>
<b>7. Cease Trading</b>	<b>7</b>
<b>8. Record Keeping</b>	<b>8</b>
<b>9. Confidentiality</b>	<b>8</b>
<b>10. Nufarm's Life Saving Rules</b>	<b>9</b>
<b>11. Document Information, Review &amp; Sign-off</b>	<b>10</b>

## A message from our CEO

### **Our commitment**

Nufarm has a proud history of delivering what farmers and customers need now, while developing what they need for the future. Nufarm is a global agricultural innovator providing crop protection and seeds technology solutions to help our customers grow a better tomorrow.

We are committed to conducting business consistent with the principles of honesty, integrity and respect which allow us to positively contribute to society. In doing this we strive to build an inclusive and diverse culture that embraces learning and fosters trust. The decisions we make everyday impact our colleagues, our customers, and our shareholders.

The Nufarm Code of Conduct emphasises the role that our employees play in building trust, and the approach we should take in making decisions.

During our day-to-day work, we are faced with situations and decisions where the right response is not obvious or easy.

The safety of our people, our products, our customers, and the community is foremost in all that we do. We should always act with integrity and honesty and use our values of respect, agility, responsibility, and empowerment to guide our decision making and help us to make ethical choices.

We expect all Nufarm employees to be transparent in their actions. Our Code of Conduct brings our Values to life and assists us to make the right decision by outlining minimum expectations of behaviour and demonstrating how to practically apply our Values, policies, procedures, and guidelines.

We are committed to upholding our Code of Conduct both inside and outside of Nufarm. It sets a standard of behaviour and keeps us accountable.

Greg Hunt,

Chief Executive Officer

## 1. Introductions

The purpose of this Supplier Code of Conduct (**Code**) is to provide guidance to our suppliers about our expectations regarding ethical and responsible behaviour in the course and conduct of business between our respective organisations.

1.1 Nufarm is committed to ethical, sustainable, and socially responsible procurement, and we seek the same standards of conduct from our suppliers. Our suppliers are important partners in our business, and we care how they manage their business when providing goods and/or services to Nufarm.

1.2 Nufarm believes its suppliers should act in accordance with the same high standards of ethical and responsible behaviour that we expect from our employees, officers, and stakeholders, which is articulated in the message from our CEO. Suppliers should read this Code to ensure they are, or can become, compliant with these standards.

## 2. Operating Lawfully

This Code sets out the minimum requirements suppliers should meet to become or remain a supplier to Nufarm. By supplier we mean, any entity that supplies goods and/or services, howsoever described, to any Nufarm entity, anywhere in the world. Where reference is made to employees, it includes permanent labour, contractors, temporary and agency personnel, and officers of the supplier's organisation.

2.1 Any reference in this Code to a law or regulation, is the law or regulation in the jurisdiction where goods and/or services are procured or provided by the supplier to Nufarm, and where applicable, any other international instrument to which the supplier may be bound. It is expected that suppliers are fully compliant with all laws and regulations applicable in the jurisdictions in which they operate and should ensure anyone acting on their behalf is aware of, understands and can comply with those laws and this Code.

2.2 Nufarm prohibits bribery and corruption in all of our business. You must not offer, provide, or receive anything of value to or from a public official or someone in business, either directly or indirectly, to obtain or retain a commercial advantage or to induce or reward the recipient, or any other person, for acting improperly.

2.3 Nufarm respects our competitors and will not misuse our position to restrict competition and we expect the same from our suppliers. You must actively promote compliance with competition, antitrust and related laws. You must not enter into agreements or understandings that have the purpose or effect of unlawfully restricting competition, including price fixing, market sharing, restricting output and bid rigging. You must not abuse or misuse market power or a dominant position in a market.

2.4 Nufarm is committed to complying with sanctions and restrictions on trade imposed by governments and international bodies (such as the United Nations) that restrict us from entering into agreements or arrangements with certain countries, entities, and people. You must not breach sanctions obligations by conducting business with sanctioned or designated people, supplying sanctioned products to Nufarm or to a sanctioned country.

2.5 In addition to this Code, contracts and purchase orders may require higher standards of conduct or compliance with laws, than those stated in this Code and suppliers should ensure they carefully read and understand any additional obligations.

### 3. Health and Safety

The health and safety of our employees and the employees of our suppliers is of paramount importance to our business. At Nufarm, safety is not just something we talk about, it's something we prioritise. Whether you are dealing with chemicals in a laboratory or walking down the stairs in an office building, your safety and the safety of those around you is of paramount importance.

3.1 If your employees are working at a Nufarm site, they must meet all conditions and follow all instructions set out by the site HSE manager.

3.2 Nufarm has 7 Life Saving Rules, which are key to ensuring all people operating on our sites go home to their families safe and well and are included at the end of this document for information.

3.3 Suppliers are expected to provide a safe and healthy work environment at their own operations and must have processes in place to identify and manage risks to the health and safety of their employees, including a process that investigates worker injuries and seeks long term and effective preventative actions.

3.4 Suppliers must provide basic employee necessities such as potable drinking water, adequate restrooms, first aid and fire suppression equipment and provide appropriate safety equipment required for each job function.

3.5 Suppliers should have an emergency response plan in place, which is periodically reviewed, and updated as required. Nufarm may request a copy of such plans at any time to satisfy itself that health and safety standards at the suppliers' operations are being met.

### 4. Integrity and Ethics

Nufarm encourages interaction with its suppliers based on mutual interest in commercial transactions for valuable consideration. We make decisions in the best interests of Nufarm, free from personal bias.

4.1 A conflict of interest can arise when private interests or activities influence, or appear to influence, a person's ability to act in the best interests of their organisation. Conflicts of interest may include but are not limited to:

- i. The Nufarm employee with whom the supplier is dealing, or who is the decision maker in a current or proposed business engagement, has an investment directly or indirectly in the supplier's business.
- ii. The Nufarm employee with whom the supplier is dealing, has a close personal relationship with the supplier, including a close relative, or a romantic or intimate relationship with any of the supplier's employees.

4.2 Suppliers should not provide personnel gifts or benefits nor undertake nor engage in any action or activity that could be considered an inducement to obtain unfair advantage, or unduly or unfairly influence a Nufarm decision maker.

4.3 Suppliers should not be subjected to demands for gifts or personal benefits by Nufarm employees.

4.4 If you suspect, on reasonable grounds, that a Nufarm employee is seeking to commit or has committed an act of misconduct in relation to their dealings with you, then you can make disclosure to any other officer or senior manager of the Nufarm Group through the "Integrity Helpline" which can be accessed via our Nufarm Ltd website, or through the telephony service provided by our partner Navex. Telephone numbers and our website may be found here: [Integrity Helpline](#) , these details may also be found at the end of this document.

4.5 In the event a local procurement team member is the Nufarm employee who is the cause of the potential conflict, the supplier should make disclosure of the conflict to the Global Strategic Procurement Manager, who can be reached via the local Nufarm entity.

## 5. Human Rights

Nufarm is committed to fair, ethical, and professional business practices and an inclusive, safe workplace for all. Suppliers must comply, both in letter and spirit, with all applicable laws, rules and regulations in the jurisdictions in which Nufarm operates.

5.1 Suppliers must provide a work environment that is free of harassment, abuse, and discrimination. Employees should be valued for their contributions and any form of harassment or intimidation, prohibited.

5.2 Employees should be treated fairly and working hours, wages and benefits should be provided in accordance with local laws and industry standards.

5.3 Nufarm's suppliers are expected to adhere to the International Convention on the Rights of the Child. At no time shall any form of child labour be used which is not compliant with national laws and relevant International Labour Organization (ILO) Standards concerning age.

5.4 Nufarm is committed to ensuring that slavery and human trafficking are not occurring anywhere in Nufarm's business or supply chain, or by Nufarm's business partners. You are expected to adhere to the requirements of applicable modern slavery laws and related human rights law, and to uphold those requirements.

5.5 Nufarm suppliers must prohibit all and any form of slavery, forced labour or human trafficking and must provide, when requested by Nufarm or its nominated agents, evidence they are compliant with all relevant legislative provisions including assurances that the supplier's supply chains are free from Modern Slavery practices.

## 6. Sustainability and the Environment

We are committed to agricultural sustainability and the sustainability of our operations.

6.1 Suppliers are expected to support our efforts to progress the important environmental, social and governance issues we have identified through engagement with our stakeholders, including sustainable agricultural innovation, decarbonisation and climate change adaptation, employee and community safety, health and wellness, compliance and the regulatory environment, and product safety and stewardship.

6.2 Suppliers are expected to support our efforts by, actively seeking improvements to their operations which will benefit the environment, implement, introducing or maintaining continuous programs such as recycling, natural resources preservation, landfill reduction, green product development, energy management, GHG emissions reporting, and end-of-life disposal management.

6.3 Nufarm may request information on how a supplier is managing its environmental and sustainability practice and seek evidence from the supplier of compliance with legislative provisions relating to this matter.

6.4 Suppliers are expected to willingly participate in Nufarm's sustainability programs when requested to do so and to approach the local procurement team in the event a supplier has a proposal regarding sustainability improvement opportunities.

## 7. Cease Trading

Nufarm may cease trading with a supplier where Nufarm has:

7.1 asked the supplier to provide evidence of compliance with the requirements of this Code in relation to the sections on Slavery, Labour Practices, and the Environment, and the supplier fails to do so within a reasonable period; or

7.2 the evidence requested in a) above has been provided by the supplier and Nufarm determines it is insufficient to support the supplier's claim of compliance; or

7.3 Nufarm becomes aware of a breach by the supplier of legislative provisions to which the supplier is bound.

## 8. Record Keeping

All suppliers are expected to keep accurate and up to date records of their business transactions.

8.1 Suppliers must ensure they comply with all relevant legislative requirements in relation to managing and maintaining business records relating to the manufacture and/or sale of goods and services, including, financial records, accounting practices, labour, health and safety and environmental practices.

8.2 Suppliers may be audited by any Nufarm entity with notice, and it is expected that full disclosure of all requested documentation will be provided in the original, subject to any required agreement in relation to confidentiality.

## 9. Confidentiality

During discussions, negotiations, or other business-related activity, Nufarm may disclose confidential information.

9.1 You must maintain the confidentiality of information entrusted to you by Nufarm except when disclosure is expressly authorised or legally required. Confidential information includes all non-public information (regardless of its source) that might be of use to Nufarm's competitors or harmful to Nufarm or our customers, suppliers or partners if disclosed. The obligation to maintain the confidentiality of information remains even after a supplier ceases to provide goods and/or services to Nufarm for a period of at least ten (10) years from the final date goods/services are provided.

9.2 You may only use confidential information provided by Nufarm for the purpose for which it was provided.

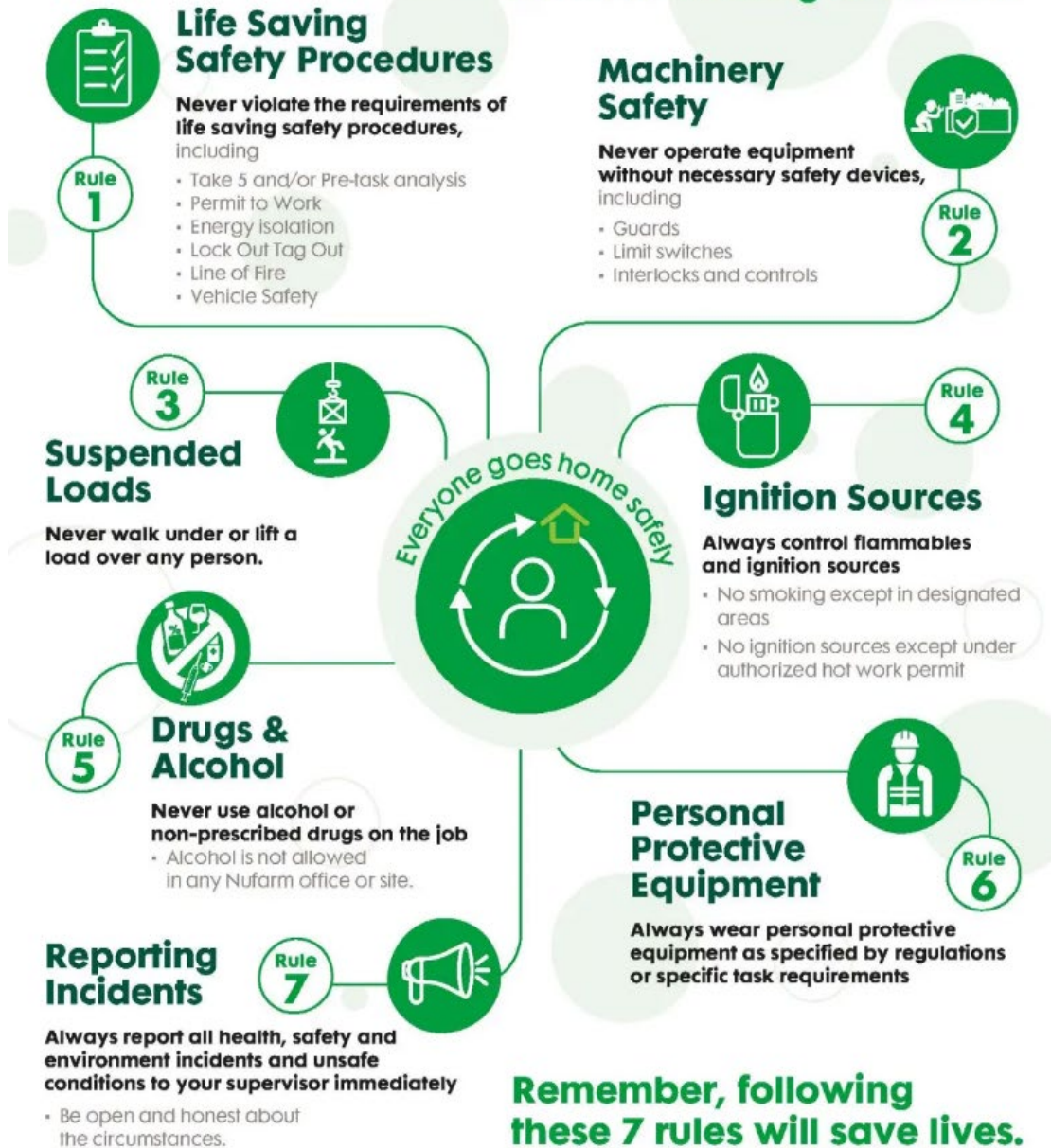
9.3 You must collect, store, and handle confidential information with respect and due care (whether online, digitally, or physically) and only for the intended business purpose.

9.4 Suppliers may be asked to execute a non-disclosure or confidentiality agreement.

# 10. Nufarm's Life Saving Rules

## our LIFE SAVING RULES

Seven non-negotiable rules for working at Nufarm



## 11. Document Information, Review & Sign-off

### Document Information

Name	Global Procurement Supplier Code of Conduct Policy
Author	C McMahon
Owner	David Bury – Global Strategic Procurement Manager
Status	Final
Version	3.0

### Signatories

Role	Name	Signature	Date
Global Strategic Procurement Mgr.	David Bury	David Bury	6/11/2024
Global Strategic Procurement Mgr.	David Bury	David Bury	24/04/2023

### Revision History

Version No.	Date	Author	Revision Description
1.0	1/7/2021	Global System Process & Compliance Mgr.	Reviewed and issued.
2.0	24/4/2023	Global System Process & Compliance Mgr.	Reviewed and issued.
3.0	06/11/2024	Global Systems Process & Compliance Mgr.	Reviewed, updated, issued.