

## **Transparency in Supply Chain and Modern Slavery Joint Disclosure Statement**

Alltech, Inc., its business units and majority-owned or controlled subsidiaries including Masterfeeds Inc. and Ridley USA Inc. (referred to collectively herein as "Alltech", "we", "our") have made this joint disclosure Statement in accordance with various requirements in the United Kingdom Modern Slavery Act of 2015\*, the California Transparency in Supply Chains Act of 2010 and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Canadian Act") to describe steps taken to avoid/combat/remediate any form of slavery or human trafficking in our supply chain. This joint Statement pertains to Alltech's most recent financial year ended December 31, 2023 (the "Reporting Period"). The reporting entities are Alltech, Inc., Masterfeeds Inc. and Ridley USA Inc.

### **Alltech Overview, Structure, Activities and Supply Chain**

Founded in 1980 by Irish entrepreneur and scientist Dr. Pearse Lyons, Alltech delivers smarter, more sustainable solutions for agriculture. Our diverse portfolio of products and services improves the health and performance of plants and animals, resulting in better nutrition for all and a decreased environmental impact. We are a global leader in the agriculture industry. Our team produces specialty ingredients, premix, supplements, feed and biologicals, backed by science and an unparalleled platform of services.

Strengthened by more than 40 years of scientific research, we carry forward a legacy of innovation and a unique culture that views challenges through an entrepreneurial lens. As a private, family-owned company, we are able to adapt quickly to our customers' needs and focus on advanced innovation.

We believe agriculture has the greatest potential to shape the future of our planet. Our more than 5,000 talented team members worldwide share our vision of Working Together for a Planet of Plenty™. Together, we can provide nutrition for all, revitalize local economies and replenish the planet's natural resources. Headquartered just outside of Lexington, Kentucky, USA, Alltech has a strong global presence.

As a global corporation with 80 manufacturing operations around the world, Alltech relies on a vast network of suppliers of goods and services (hereafter referred to as "Business Partners"). These Business Partner relationships are critical to our success. We expect our Business Partners to comply with all laws and regulations of the countries in which they operate. We also expect our Business Partners to conduct business in an ethical and responsible manner.

The Canadian Act requires disclosure on Alltech's Structure (the entity's legal and organizational form) and Activities (activities include pursuits undertaken by the entity in relation to the production or importation of goods by the entity).

In keeping with our values, we have taken the steps outlined in the following sections to ensure that we, and our Business Partners, meet the highest standards for ethical conduct, especially as it relates to human rights.

## **Modern Slavery Risk**

The term “Modern Slavery” is used throughout this document and includes both Child Labour and Forced Labor as those terms are defined in the Canadian Act.

Alltech’s supply chain includes thousands of suppliers around the world providing key raw materials that are used in the production of Alltech’s final products. Materials are sourced from various tiers in the supply chain.

Modern Slavery risk in Alltech’s supply chain is mainly related to suppliers in our upstream sourcing.

During the Reporting Period, Alltech took the following steps to prevent and reduce the risk that Modern Slavery 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:

### **Key Elements to Combating Modern Slavery**

Alltech’s approach to combating modern slavery is comprised of ten key elements:

1. Commitment/Expectations
2. Policy/Process Framework
3. Training and Awareness
4. Risk Assessments
5. Supplier Terms and Conditions
6. Inspections and Due Diligence
7. Third-party Risk Management
8. Accountability
9. Governance
10. Remediation Measures

#### Commitment/Expectations

Alltech is committed to the protection and advancement of fundamental human rights and will not be complicit with human rights abuses. Across all of its operations, Alltech will not tolerate the use of exploitive child labor, human trafficking or any forced, compulsory or otherwise involuntary labor. Alltech expects Business Partners to uphold the same standards. Alltech may discontinue the business relationship with any individual or company that does not follow the same standards.

Alltech’s commitment is aligned with and is informed by the Universal Declaration of Human Rights; the International Covenant on Civil and Political Rights; the International Covenant on Economic, Social and Cultural Rights; the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work; and the United Nations Global Compact, Principles 1, 2 and 3 (pertaining to human rights) and Principles 4, 5 and 6 (pertaining to labor).

#### Policy/Process Framework

Alltech expresses its commitment to human rights through documented policy. Internally, we have

our Alltech Global Code of Conduct and our Labor and Human Rights Policy. Externally, we have our [Alltech Business Partner Code of Conduct](#), which lays out our expectations for the behavior of third parties with whom we do business. These written policies cover labor matters, including the avoidance and deterrence of child/forced labor.

*Alltech's Global Code of Conduct states:*

"We strive to operate in a way that meets fundamental responsibilities in the areas of human rights, labor, the environment and anti-corruption, and we are working to incorporate the Ten Principles of the U.N. Global Compact into our strategies, policies and procedures."

*Alltech's Labor and Human Rights policy states:*

"Alltech, Inc. and its majority owned subsidiaries (Alltech) seek to treat all individuals fairly and create a diverse and inclusive environment, and it respects human and labor rights and standards. This includes ensuring team members are paid a living wage and work in healthy and safe environments and conditions. It also includes prohibitions against discrimination and harassment, employing children and forced labor."

*Alltech's Business Partner Code of Conduct states:*

"Alltech expects its suppliers, contractors, agents, distributors, consultants, joint-venture partners and any other third parties doing business with Alltech to act in a manner consistent with this Code. We also expect our Business Partners to ensure that subcontractors and other supply chain partners they engage on our behalf do the same.

"How our Business Partners work in accordance with this Code is an essential part of their performance for Alltech. Alltech may elect to not work with or cease to work with Business Partners who do not meet our expectations. Any violation of this Code or applicable laws may result in termination of the Business Partner's relationship with Alltech."

### *Recruitment Process*

A formalized recruitment process is in place for seeking out employees for various positions on a strictly voluntary basis. This includes partnering with reputable third parties for administrative support in this process which includes validating the age and social insurance numbers of applicants.

### Training and Awareness

We believe it is important for our team members to have an awareness and understanding of the issue of modern slavery. Accordingly, we require team members to complete a training course on our learning management system about modern slavery. The learning objectives of the course are to provide team members with a basic understanding of what modern slavery is and how to implement strategies to help eliminate it. In 2023, 95.2% of applicable team members were trained on modern slavery and protecting human rights.

## Risk Assessments

Two key risk assessments are performed that support our objectives:

1. Alltech manufacturing locations
2. Third parties

### *Alltech Manufacturing Locations*

As noted, Alltech has 80 manufacturing sites around the world. A specific global risk assessment is performed and documented to identify those Alltech manufacturing locations that may be at higher risk for the occurrence of child/forced labor situations (due mainly to risk associated with the region/country). This drives our selection of locations for on-site, unannounced child/forced labor inspections (coordinated by Alltech's independent Internal Audit function).

### *Third Parties*

Alltech regularly assesses the risk of child/forced labor situations within our supply chain, taking into account factors such as geographic location, industry sector, product provided, and nature of work. For suppliers that may be at higher risk, Alltech monitors them rigorously and routinely as part of the third-party management process (discussed below).

## Supplier Terms and Conditions

Alltech's standardized purchase order stipulates that, by agreeing to its terms and conditions, suppliers:

- Acknowledge and agree to fully comply with Alltech's Business Partner Code of Conduct.
- Warrant that it is not using Child Labor or Slave-like Conditions in meeting its obligations in the manufacture, acquisition, delivery of the goods, or performance of the Order.
- Agree to inspections to ensure compliance with the Alltech Business Partner Code of Conduct, which includes prohibitions against child/forced labor."

## Inspections and Due Diligence

Alltech's independent Internal Audit function coordinates the inspection process. The program is founded upon the principles of having unannounced, independent inspections. The inspection approach is to observe/ audit for the existence of child/forced labor red flags, as noted below.

Team member(s) at the location:

- Appear to be under the control of someone else and are reluctant to interact with others.
- Do not have personal identification on them.

- Have few personal belongings, wear the same clothes every day or wear unsuitable clothes for work.
- Are not able to move around freely.
- Are reluctant to talk to strangers or the authorities.
- Appear frightened or withdrawn, or show signs of physical or psychological abuse.
- Are dropped off and collected for work always in the same way, especially at unusual times (i.e., very early or late at night).
- Do not have documents that allow them to travel.
- Avoid eye contact.
- Appear malnourished.
- Work excessive overtime.
- Are subject to unusual work restriction rules.
- Are subject to high security measures such as boarded-up windows.
- Live in squalid conditions on-site.
- Live in overcrowded conditions.
- Are not allowed to talk to the inspector.
- Are not in control of their own money.

At the conclusion of an inspection visit, the third party prepares a detailed report that outlines procedures performed and highlights any issues noted. When issues are identified, they are communicated internally, and remediation plans are developed, implemented and tracked via internal governance processes. Follow-up site inspections may be necessary to validate that remediation plans have been implemented and continue to be followed.

In January 2023, the third-party inspector visited three separate Alltech manufacturing locations: Cambodia, Thailand and Vietnam. In October 2023, the third-party inspector visited two separate Alltech manufacturing locations in Brazil. ***No child/forced labor issues were observed or identified during any of these inspections.*** These results are documented in the final reports.

### Third-Party Risk Management

Higher-risk third parties are identified in the risk assessment process (discussed above) and then monitored via the third-party risk management process. Monitoring includes compliance screening

with local regulations, Human rights standards, and adverse media checks. We are working to improve the traceability of the products delivered to Alltech, implement an inspection program for high-risk third parties, and develop applicable key performance indicators (KPIs) pertaining to this area (see below).

Accountability

Key elements of our accountability structure include KPIs and a reporting system called Speak Up!

*KPIs*

Alltech establishes accountability via KPIs that are published in its sustainability report. [Alltech's most recent Sustainability Report](#) identified the following key performance indicators related to modern slavery:

<b>KPI Description</b>	<b>KPI Metric</b>
Number of child or forced labor incidents at Alltech facilities.	0
Number of unannounced inspections per year of Alltech production facilities for child or forced labor.	2
Number of on-site inspections performed at high-risk suppliers of raw material with direct production (based on product and region risk profile).	3 inspections by 2025
Percentage of applicable team members trained on protecting human rights.	100% by 2024

*Speak Up! Reporting System*

Alltech has established a global program branded internally as the Speak Up! Reporting System. Our policy on reporting concerns encourages team members to use this system to share concerns about unethical conduct or matters of noncompliance. This includes concerns about child/forced labor and human trafficking and issues with Alltech's Labor and Human Rights Policy. This also includes concerns about discrimination and harassment and noncompliance with Alltech's Non-Discrimination and Anti-Harassment Policy.

Team members have several options to access the Speak Up! Reporting System, including a mobile app, a webpage option and independent live operators. Each of these is available 24/7 and in 21 languages. The administrator of the system is a third party that is committed to data privacy and is ISO 27001 certified. Alltech's Non-Retaliation Policy is in place to protect team members who share concerns in good faith.

Governance

An effective governance structure is critical to ensuring proper oversight of the program. The responsibility for oversight of our framework and program rests with Alltech's Reputation Overview Committee (ROC). The ROC is a global risk/governance committee comprised of key leaders.

## Assessment of Effectiveness

To evaluate how well Alltech's systematic approach addresses modern slavery, we regularly conduct methodical reviews across our operations and supply chain. Our primary method for gauging the effectiveness of our efforts is through tracking key performance indicators (KPIs). Since 2023, we've measured the impact of our metrics as outlined below:

KPI Description	KPI Metric	2023
Number of child or forced labor incidents at Alltech facilities.	0	0
Number of unannounced inspections per year of Alltech production facilities for child or forced labor.	2	5
Number of on-site inspections performed at high-risk suppliers of raw material with direct production (based on product and region risk profile).	3 inspections by 2025	0
Percentage of applicable team members trained on protecting human rights.	100% by 2024	95.2%

## Remediation Measures

The actual remediation plan for child/forced labor issues is designed to be handled on a case-by-case basis and vary depending on the issues and locations involved. Should a case of child/forced labor be identified, Alltech would apply its incident management plan to the situation, which would mean identifying key team members and team leads to develop a plan targeted to the circumstances. The ROC would review and approve the plan and stay involved from an oversight perspective, receiving status reports and providing guidance as needed through to completion.

In the Reporting Period, no instances of forced and/or child labor have been observed or identified. Accordingly, no remediation efforts have been taken, and we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

## Continuous Improvement

We believe we have implemented an effective framework and program to combat modern day slavery, and we are committed to a continuous improvement process model. As such, we will evaluate our progress over time and make updates as necessary to address this important issue.

There should be no such thing as "modern day" slavery. As a global business, we stand committed to doing whatever we can to combat its presence in the communities in which we live and work.

In accordance with the requirements of the Canadian Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Statement for the entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Statement is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

This Statement has been approved pursuant to Section 11(4)(b)(ii) of the Canadian Act by the respective Board of Directors of Alltech, Inc., Masterfeeds Inc. and Ridley USA Inc. on May 30, 2024.



E. Michael Castle, II

Director

Date: May 31, 2024

I have the authority to bind Alltech, Inc., Masterfeeds Inc., and Ridley USA Inc.

*With regard to Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, this disclosure is made for and on behalf of, and is approved by, the boards of directors of:*

*Alltech, Inc.*

*Masterfeeds Inc.*

*Ridley USA Inc.*