



Knowledge grows

2021 Modern Slavery Transparency Statement Yara International ASA

1. About this statement

Yara International ASA (Yara) 2021 Modern Slavery Transparency Statement is for the financial year 1 January – 31 December 2021. The statement is pursuant to the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018.

Yara operates and is managed as an integrated group with overarching policies, systems and processes that apply across our controlled entities. Yara's 2021 Modern Slavery Transparency Statement has therefore been prepared as a joint statement that is valid for Yara International ASA and its subsidiaries. These include, but are not limited to, Yara UK Limited and Yara Pilbara Fertilisers Pty Ltd. This statement is also valid for Yara Pilbara Nitrates Pty Ltd, an entity that is not fully owned, but operated by Yara and falls under the reporting requirements of the Australian Modern Slavery Act 2018. This entity follows relevant Yara policies and procedures and utilises Yara systems.

The statement is prepared based on information collected from all subsidiaries, and the entities mentioned above have been consulted on the statement itself.

The table below sets out the reporting requirements and recommendations pursuant to the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 and where these are addressed in our statement.

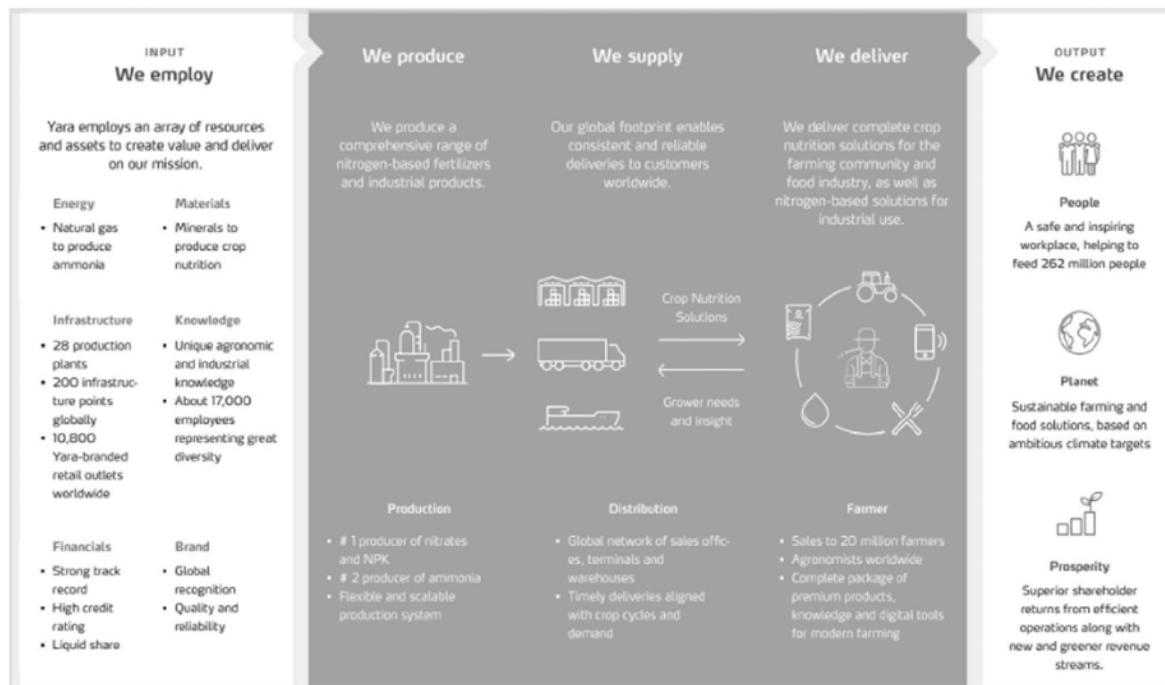
Australian Act requirements	UK Act recommendations	This statement
Identify the reporting entity		1. About this statement, p. 1
Describe the structure, operations and supply chain of the reporting entity.	Describe the organisation's structure, its business and its supply chain.	2. Our business and supply chain, p. 2
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Describe the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk.	3. Human rights due diligence, p. 3
Describe the actions taken by the reporting entity and any entities that reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	Describe its policies in relation to slavery and human trafficking. Describe its due diligence processes in relation to slavery and human trafficking in its business and supply chain.	3. Human rights due diligence, p. 3 4. Policies and commitments, p. 4 6. Grievance and whistleblowing channels, p. 5 7. Training and awareness, p. 6
Describe how the reporting entity assesses the effectiveness of these actions	Describe its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.	5. Governance, p. 5 9. Assessing effectiveness, p. 6
Describe the process of consultation with any entities the reporting entity owns or controls. In the case of a joint statement this must also describe consultation with the entity giving the statement.		1. About this statement, p. 1
	Describe the training and capacity building about slavery and human trafficking available to its staff.	7. Training and awareness, p. 6
Any other relevant information		



2021 Modern Slavery Statement

Knowledge grows

2. Our business and supply chain



Yara grows knowledge to responsibly feed the world and protect the planet. Supporting our vision of a world without hunger and a planet respected, we pursue a strategy of sustainable value growth, promoting climate-friendly crop nutrition and zero-emission energy solutions. Yara has a worldwide presence with about 17,000 employees and operations in over 60 countries.

Our business model combines production, sales and marketing in one, global system. It enables us to deliver premium products, share knowledge, and develop innovative solutions to farmers, distributors and food value chains worldwide.

Our operations are based on the efficient conversion of energy, and of natural minerals and nitrogen from the air into essential products for agriculture and industry. As the leading global provider of nitrogen fertilizers and industrial applications, we leverage our experience and knowledge to tailor solutions to local needs. Yara's value chain starts with mining operations and the sourcing of raw materials and extends to the distribution of crop nutrition and industrial solutions to customers worldwide.

A large part of Yara's overall costs are variable and related to sourcing. We source a wide variety of goods and services from more than 40,000 suppliers worldwide. Close to 80% of Yara's operating expenses are related to the purchase of raw materials, energy costs and freight expenses.

The main materials and services used in our supply chain are:

Feedstock and energy, mainly natural gas, and in some cases other forms of hydrocarbons, and electricity. These are produced in many regions across the world and mostly sourced locally close to our production locations for the production of nitrogen fertilizers and industrial products.

Ammonia and Nitrogen-based products (N), are produced in the same way as Yara produces these, in many regions across the world, especially in so-called low-gas costs regions such as the Middle-East. These are sourced as input for our production processes, in addition to the materials we produce ourselves.



2021 Modern Slavery Statement

Knowledge grows

Phosphorus (P) occurs in natural geological deposits of phosphate rock, which is mined from the earth's crust. The largest phosphate rock resources are located in Morocco, China, Algeria, Syria, and Brazil. Yara sources P to produce granular and feed phosphates and NPK fertilizers.

Potassium salts, or potash (K), are mined from naturally occurring ore bodies that were formed as seawater evaporated. Yara sources mainly from the countries with the largest deposits, such as Belarus, Russia, Germany, Israel, Canada and Chile.

Logistics Services, especially maritime logistics and road transport for transport of some of the raw materials to our production units and deliveries of finished goods to the markets where we operate. Road transport services are provided from local service providers in the markets, whereas maritime logistics are mostly provided by globally operating suppliers.

Yara sources many other products and services, such as; other crop nutrients; technical equipment for our production facilities; maintenance services; professional services; IT services and equipment; personal protective equipment (PPE) and safety equipment for site personnel; and packaging materials.

For more details on our operations and on how we manage our relationships with suppliers, please refer to www.yara.com

3 Human Rights Due diligence

Human rights is integrated in our Compliance Program and risk management processes. We are committed to conducting human rights due diligence in accordance with the UN Guiding Principles for Business and Human Rights and OECD Guidelines for Responsible Business Conduct, which includes identifying our potential human rights impacts; preventing, mitigating, and remediating those we are causing or contributing to; and seeking to prevent and alleviate impacts we may be linked to. We commit to continuously improving our work in this area.

A global human rights risk assessment is updated annually and ranks the countries where Yara operates and countries we source raw materials from in terms of human rights risk exposure. This guides our focus on targeted human rights impact assessments (HRIA), which is an integral part of meeting our due diligence obligations. HRIAs are performed by independent external subject matter experts in locations where our operations have the highest impact on human rights, and where our leverage to remedy is considered highest.

Findings from HRIA's are presented to Executive Management and the Board of Directors. Mitigating actions remain a local management responsibility, and the Ethics and Compliance department monitors implementation and reports on progress.

The Integrity Due Diligence (IDD) procedure is also used for identification of human rights risk exposure in our supply chain. On a risk-basis, certain Business Partners are selected for additional follow-up, including in depth due diligence work, training and other communications efforts. Depending on the matter; this is conducted by either the Ethics & Compliance department, other expert functions or the business line. Continued monitoring of business partner transactions is also part of the IDD procedure and consists of daily screening against sanctions and compliance databases as well as close cooperation between the business line and the Ethics and Compliance department. Compliance with the Code of Conduct for Yara's Business Partners is followed up by the business line, and by Procurement and HESQ functions.

Compliance requirements, particularly related to anti-corruption and human rights, are integral to the part of the decision-making process for the assignment of capital for all of Yara's major investment activities. Yara's Capital Value Process includes clear compliance requirements for all projects covered by the policy, including due diligence activities and verification by the Ethics & Compliance department.



2021 Modern Slavery Statement

Knowledge grows

3.1 Risks of modern slavery in our operations and supply chain

Yara does not consider any of its fully owned operations to be at significant risk of child or forced labor, however we recognize that due to Yara's geographic risk, complex value chain and sector risk, many of the materials and services we source/purchase carry a risk of modern slavery, child labor and/or human trafficking.

The risk of modern slavery in Yara's operations increases in geographic areas without strong industrial relations laws and in circumstances where Yara subcontracts its workforce. For example, sectors with a traditionally transitory, highly casualised and/or subcontracted workforce like the construction industry or cleaning services generally carry a higher risk of modern slavery particularly when the people in these workforces are not engaged directly by Yara.

Work to further map human rights impacts and risks in our value chain, and to implement human rights considerations in our supplier compliance management process will continue in 2022. This will include an assessment of sustainability risk factors within each of our procurement categories and our suppliers, including risks of child and forced labor. The supplier compliance management process will be an integrated part of our Sustainable Procurement Program. >> *See more under 8. Priorities and the way forward, p. 6.*

3.2 Identified impacts

The 2021 Yara human rights risk assessment identified 19 high-risk countries, up from 18 in 2020. All high- and medium-risk countries are monitored through the Compliance Program and specific action plans are developed to mitigate identified impacts.

In 2021 we conducted HRIA's on our main production sites in Brazil, including selected fertilizer blending units and bagging warehouses. One of the concerns identified was related to child and adolescent sexual exploitation in local communities due to influx of labor at ports and in industrial areas, including road freight activities possibly linked to Yara's activities. It is a priority area to address these findings, which is one of the major social issues identified in the local communities surrounding some of Yara's operations. A Yara multi-disciplinary team has been established to engage in dialogue with key stakeholders for the prevention of sexual exploitation of children and adolescents and to develop a country-level strategic plan to help identify, prevent, and address this risk in connection to our operations. These stakeholders include local communities, NGOs, local service stations, road freight users, transportation companies and drivers' unions. Reporting on progress is done regularly to the Executive Committee in Brazil. Findings and actions are also formally discussed at the highest levels in the organization.

No further significant breaches or human rights impacts related to modern slavery or child or forced labor were identified through our existing systems in 2021, either in our own operations nor in the supply chain.

We continuously work to improve our due diligence processes to identify and mitigate human rights impacts, and expect the same from our business partners.

4. Policies and commitments

Yara has made a commitment to respecting internationally recognized human & labor rights throughout our own operations, as well as in our supply chain - not only because it is the right thing to do, but because it makes business sense. Respecting human rights is fundamental to sound risk management and Yara's value creation.

We support the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, the Voluntary Principles on Security and Human Rights and the core conventions of the International Labor Organization (ILO). As a signatory to the United Nations Global Compact, Yara is firmly committed to its ten core principles, which cover human rights, labor rights, environment and anti-corruption.

The key principles of Yara's compliance program are defined in the **Code of Conduct** which outlines our position and commitments on a wide range of topics, and which expressly prohibits forced labor, child labor and human trafficking. The Code of Conduct applies to all Yara employees, whether full-time, part-time, permanent or temporary, and to the members of the Board of Directors. We are proud to say that the document is translated into more than 15 languages and distributed globally. Yara's Code of Conduct is reviewed annually and is approved by the Board of Directors.



2021 Modern Slavery Statement

Knowledge grows

The **Code of Conduct for Yara's Business Partners** considers internationally recognized and endorsed standards in key areas such as international human rights, business ethics and labor conditions. Yara expects its Business Partners to uphold similar standards and to require the same from its own set of Business Partners, especially those that conduct business for Yara. The Code of Conduct for Yara's Business Partners shall be included in all material contracts.

The **Ethics and Compliance Commitment** outline our Compliance Program for preventing corruption and human rights abuse, and to promote an ethical culture and responsible business conduct. It has been created for the benefit of all Yara's stakeholders.

All policy documents are available on our website www.yara.com

5. Governance

Yara's Ethics and Compliance Department has organizational responsibility to provide a best in class ethics and compliance program. The department plays a key role in the management of all risks related to corruption, fraud, human rights and Business Partner integrity. Ethics training of employees is among the key performance indicators (KPIs) followed by Yara's Board of Directors. The Ethics and Compliance department consists of 17 full time employees, with a corporate team in Oslo supported by a network of Regional Compliance Managers. The Regional Compliance Managers are responsible for implementing Yara's Compliance Program including providing training and giving guidance in their respective regions.

Ethics and compliance matters, including human rights, are regularly and formally discussed at the highest levels in the organization. The Chief Compliance Officer reports administratively to the Executive Vice President and General Counsel, twice annually to the Board of Directors, quarterly to the Board Audit and Sustainability Committee and monthly or as needed to the CEO on matters relating to ethics and compliance, including human rights.

Yara has a Compliance Committee, which is chaired by the CEO and attended by the members of Yara's Group Executive Board. The Compliance Committee meets quarterly and acts as a focal point for these topics.

Yara has established a Sustainability Network, which ensures that Yara has clearly established accountability, processes, and systems in place for our ESG policies and performance indicators. This includes matters related to ethics and compliance and human rights. The Sustainability Network includes representatives from our corporate functions: Sustainability Governance, Health, Environment, Safety and Quality (HESQ), Human Resources, Ethics and Compliance, Corporate Communications, and Enterprise Risk Management, as well as representatives from the business line.

6. Grievance and whistleblowing channels

Many of Yara's production sites have established green lines or communicate similar channels for neighbors and other stakeholders to call in questions, suggestions, or criticisms. Social media is also increasingly used to engage with local communities. Our local production units have systems in place to register and follow up complaints and other feedback from external stakeholders. Grievances related to our environmental performance are reported monthly to our central Corporate HESQ function. Several product quality complaint handling systems are also in place, each adapted to the various business models and operations throughout the world. Our country websites feature contact forms for anyone who wants to raise questions or provide feedback.

In 2021, we also started a process to advance our grievance mechanisms by mapping the use of local reporting channels across our operations. This work will continue in 2022, aiming to establish best practices and increase transparency in our overall monitoring and reporting of grievances.

Employees and Business Partners are expected to report suspected violations of the Code of Conduct, Yara's policies and procedures, or laws and regulations in our own operations and in our supply chain. For employees the first point of contact should be the line manager. Alternatively, both employees and external stakeholders may use the Ethics Hotline which is available in 60 languages 24 hours a day, 7 days a week. Our website and intranet also feature an option to contact the Ethics and Compliance department directly at ethics@yara.com. Yara has an obligation to investigate all reports made, and all notifications are treated confidentially.



2021 Modern Slavery Statement

Knowledge grows

7. Training and awareness

Human rights is included in all ethics and compliance training, including mandatory e-learning for new hires and face-to-face training programs. We also have additional e-learning modules covering topics from the Code of Conduct that are available to all Yara employees. This includes Ethical conduct and reporting concerns, with a specific section on Human rights; Harassment & Discrimination; and Gender Bias. The Ethics and Compliance training program is delivered by dedicated Regional Compliance Managers.

In 2021 more than 3500 employees received 'face-to-face' training in ethics and compliance related matters, including human rights as a distinct topic. Since we introduced human rights in our training portfolio in 2018, 1142 Yara employees and 171 external business partners have received training specifically on human rights. Read more about our training performance in our 2021 Sustainability Report available on www.yara.com.

As a response to our commitments to the Voluntary Principles on Security and Human Rights (VP), a specific training program incorporating Yara's program for human rights and VP training material was developed and rolled out in 2021. The training material is mandatory for relevant internal staff and contracted security providers. The training material is based on the VP Training Material available for members, and small adjustments have been done to fit the Yara context. Read more in our [Voluntary Principles Report 2021](#).

On a risk-basis, certain Business Partners are selected for additional follow-up, including training and other communications efforts. Depending on the matter; this is conducted by either the Ethics & Compliance department, other expert functions or the business line.

8. Priorities and the way forward

Human rights impact assessments conducted by external subject matter experts are an essential part of our human rights due diligence work. In 2022 we will perform human rights impact assessments on selected operations in Africa and Asia.

Yara is committed to continuously improving our work on human rights due diligence, both in our own operations and in our supply chain. A target for 2022 is to perform human rights due diligence activities on selected high risk business partners including audits and training.

We will continue to improve our work on raising awareness on human rights in our organization. In 2022, we will design and implement a new human rights e-learning course and make it available to all employees.

Yara is committed to being a part of a responsible and sustainable supply chain and will continue to work on improving our systems and processes to achieve this objective. In 2021 Yara started the process of drafting a Sustainable Procurement Policy and Supplier Compliance Management Process, which will be finalized and implemented as of 2022. These are specific measures to monitor compliance with Yara's Business Partner Code of Conduct and to integrate our business integrity standards into the full cycle of supplier management. To support implementation of these measures we will use, as of 2022, third party business sustainability ratings to evaluate our suppliers and support implementation of any corrective action plan where needed in our supply chain. These are essential steps in advancing our human rights due diligence efforts, both to meet our Mission, Vision and Values and our legislative obligations in the expanding mandatory human rights due diligence landscape.

9. Assessing effectiveness

Yara International ASA has a dedicated Ethics & Compliance team to address the identification of human rights risks, including modern slavery, child labor and human trafficking at group level. The effectiveness of the Compliance Program is evaluated annually in the business plan process and an annual maturity assessment of the program is presented to the Board of Directors. Policies and procedures follow the established renewal cycle of three years on the Yara Steering System.

The Code of Conduct and Code of Conduct for Yara's Business Partners have both been reviewed and updated in 2021, valid from 1 January 2022. Both documents have also been reviewed by an external partner to assist in



2021 Modern Slavery Statement

Knowledge grows

ensuring that the content is relevant and up to date. This includes the chapter on human rights in the CoC. The Code of Conduct is approved by the Yara CEO and Board of Directors, whilst the Code of Conduct for Yara's Business Partners is circulated amongst relevant internal stakeholders for input with final approval by the Global Executive Board. Material changes to the Code of Conduct include a new section acknowledging our environmental impact and responsibilities, and outlining our dedication to excellent environmental performance.

More information about our Sustainability and Human Rights performance can be found in Yara's 2021 Sustainability Report available on www.yara.com.

A handwritten signature in black ink, appearing to read "Trond Berger".

Trond Berger, Chairman of the Board
Yara International ASA
Date

DocuSigned by:

A handwritten signature in black ink, appearing to read "Alvin Rowall".

84BCAFD9D1F8464...

Chairman of the Board
Yara Pilbara Nitrates Pty Ltd
Date

A handwritten signature in black ink, appearing to read "Andy Salway".

Chairman of the Board
Yara UK Limited
Date