



TRANSPARENCY IN SUPPLY CHAIN AND MODERN SLAVERY DISCLOSURE STATEMENT

Alltech Inc. its business units and majority-owned or controlled subsidiaries (referred to collectively herein as “**Alltech**”), has made this disclosure statement in accordance with various requirements in the United Kingdom Modern Slavery Act of 2015* and the California Transparency in Supply Chains Act of 2010 to describe various steps taken to avoid/combat any form of slavery or human trafficking in our supply chain.

Alltech Overview, Structure and Supply Chain

Alltech is a global leader in the animal health industry, producing specialty ingredients, premix supplements, and complete feed. Alltech is a private, family-owned company, which allows us to adapt quickly to our customers’ needs and maintain focus on advanced innovation. Headquartered just outside of Lexington, Kentucky, USA, Alltech has a strong presence in all regions of the world.

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. Our more than 5,000 talented team members in over 350 communities share our vision for a Planet of Plenty™. We believe agriculture has the greatest potential to shape the future of our planet, but it will take all of us working together, led by science, technology and a shared will to make a difference.

As a global corporation with manufacturing operations around the world, Alltech relies on a vast network of suppliers of goods and services (hereafter referred to as “**Suppliers**”). These supplier relationships are critical to our success. We expect our suppliers to comply with all laws and regulations of the countries in which they operate. We also expect our suppliers to conduct business in an ethical and responsible manner. In keeping with our values, we have taken the steps outlined in the following sections to ensure that the suppliers we select and partner with meet our standards and adhere to our expectations for ethical conduct, especially as it relates to human rights.

Policies in Relation to Modern Day Slavery and Human Trafficking

Framework

Alltech has established a framework relating to trafficking and slavery that consists of three key elements: **Commitment/Expectations, Accountability and Governance/Reporting.**

Commitment/Expectations

Alltech is firmly committed to conducting business throughout the world in accordance with the highest legal and ethical rules and principles. As an example, we committed to the United Nations Global Compact (UNGC) on July 12, 2019. The UNGC provides corporations with a value system and principle-based approach to conducting business 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 as reflected in various sections of this disclosure statement.

Alltech outlines its commitments/expectations through several documents including our Global Code of Conduct, our Human Rights Policy, and our Supplier Code of Conduct.

Alltech's Global Code of Conduct outlines our values and our standards for conducting business throughout the world. It also serves as a resource to guide employees when the right choice may not be clear. This document is distributed to every employee.

Alltech's Human Rights Policy establishes that Alltech will not tolerate any form of slavery or trafficking in its supply chain. The policy also highlights the alignment of Alltech's values with various global principals including the Universal Declaration on Human Rights; The International Covenant on Civil and Political Rights; The International Covenant on Economic, Social and Cultural Rights; and The International Labor Organization's Declaration on Fundamental Principles and Rights at Work and the United Nations Global Compact, Principles 1, 2, 3, 4, 5 and 6.

The Supplier Code of Conduct outlines what Alltech expects from its suppliers with respect to human rights, labor and employment rights, environmental health and safety, business ethics and social responsibility, and global trade practices. Suppliers are expected to adhere to this code and must operate in full compliance with the laws and regulations of the countries in which they operate and applicable international laws. When local laws and regulations are less restrictive than this code, suppliers are expected to adhere to Alltech's principles. Failure to comply with internationally recognized standards, and the standards set forth in the Supplier Code of Conduct document, may result in the termination of the supplier's contract. The Supplier Code of Conduct is distributed to substantially all critical suppliers.

Accountability

Through our **Speak Up! reporting system**, Alltech encourages an open environment where concerns can be raised, and people feel confident to report concerns - including

concerns relating to slavery and trafficking in the supply chain. The Speak Up! Reporting System is a confidential system administered by an independent, globally recognized third party, providing several reporting options including live operators (with language support), online and mobile options.

In the past year, Alltech did not have any reports or investigations that were indicative of either modern slavery or human trafficking.

Governance/Reporting

Alltech has **governance structures** in place to ensure proper oversight on issues pertaining to slavery and trafficking including the review of any reported concerns that may be submitted via the Speak Up! reporting platform.

Through its annual **Sustainability Report**, Alltech provides a publicly available document that outlines key performance indicators and our focus on matters pertaining to trafficking and slavery.

The following sections outline portions of our framework documents that pertain to trafficking and slavery.

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 Supplier Code of Conduct States:

"There shall be no forced labor of any kind, including forced, bonded, trafficked or imprisoned labor. This is to include but not limited to harboring, transporting against their will, recruiting or receiving persons by means of force, violence, deceit, abduction or misleading practices for labor."

Alltech's internal Human Rights policy states:

"Alltech Inc. (Alltech), its business units and majority-owned or controlled subsidiaries ("Alltech"), are committed to the protection and advancement of fundamental human rights and will not be complicit with human rights abuses. Alltech will not tolerate the use

of exploitative child labor, forced, compulsory, or other forms of involuntary labor or human trafficking in any of its operations. Alltech expects suppliers and contractors to uphold the same standards. Alltech shall discontinue the business relationship with any individual or company that does not follow the same standards.”

Alltech’s 2020 Sustainability Report states:

“This year, we introduced a Code of Conduct to clearly communicate our values and set expectations for behavior, decision-making, business practices and anti-corruption. There is nothing more important than the integrity and quality of character represented by Alltech. It is not a request, but an expectation, that we all act with honesty and abide by the values detailed within our Code of Conduct. To support our shared commitment to the values and culture represented within the Code, we have established a Speak Up! Reporting System. This confidential system administered by an independent third party enables our team members to make us aware of issues that are inconsistent with the law or our values, policies or Code of Conduct.

We also created a Human Rights Policy to uphold our commitment to the protection and advancement of fundamental human rights. Alltech will not tolerate the use of exploitative child labor, forced, compulsory or other forms of involuntary labor, or human trafficking in any of its operations. We also expect suppliers and contractors to uphold the same standards.”

Risk Assessment, Verification, Due Diligence Audits

Alltech is actively working to develop and improve processes pertaining to the areas of risk assessment, verification, due diligence and audits. An internal team has been formed and is assessing new procedures and applications to support a formalized third-party risk management framework. Embedded with the team is the objective to have a framework that is focused on risk assessing potential suppliers for trafficking and slavery risk. Key elements of the risk assessment will include evaluating risks associated with particular products/raw materials, geographic regions and any prior compliance/ethical issues with the supplier. The team is also focused on developing on-boarding procedures for new suppliers to ensure they are aware of expectations in the human rights area. Finally, the team has been tasked with developing on-going procedures that are designed to ensure that higher risk suppliers are periodically risk assessed.

In addition, Alltech is a member of EcoVadis, a third-party platform by which Alltech can measure suppliers’ social, environmental and ethical performance.

Training on Modern Day Slavery and Trafficking

During 2021, Alltech's Sustainability and Compliance Teams developed content for an instructor-led awareness training course on Modern Day Slavery and Human Trafficking. In late 2021, this course was presented to Alltech's executive and senior leadership team and included the following learning objectives:

- Understand key definitions relating to modern day slavery and human trafficking
- Understand the global frameworks and laws that guide improvement in Human Rights
- Understand the size and scope of the problem of modern day slavery and human trafficking

In the first half of 2022, Alltech will be implementing a global Learning Management System (LMS) to enable computer-based learning for all employees. The associated course library will contain several courses that are focused on developing awareness around human rights, Modern Day Slavery and Human Trafficking. Over the course of the second half of 2022, we expect to assign these courses to appropriate employee groups/roles where awareness in these areas is considered essential to an overall risk mitigation strategy.

Key Performance Indicators

Alltech's 2020 Sustainability Report identified the following two key performance indicators:

- Number of child or forced labor incidents reported
- Number of inspections per year to audit factories for child or forced labor

Path Forward

Alltech is committed to improving our understanding and management of modern slavery and trafficking risks over time. As we learn from our risk assessments, we expect our approach to continue to evolve, our practices to become more refined and our capabilities to mitigate and support slavery and human trafficking risks to become more robust.



Dr. Mark Lyons
President and CEO, Alltech

** With regard to the UK Modern Slavery Act, this disclosure is made for and on behalf of, and approved by the boards of directors of:*

- *Alltech (U.K.) Limited – (UK Company No. 01634012);*
- *Alltech E-CO2 Limited – (UK Company No. 06910273);*
- *Alltech Farming Solutions (UK) Limited – (UK Company No. 10122494); and*
- *CMS UK Services Limited (UK Company No. 04490837).*