

Mighty Earth - Rapid Response Soy Report 2 - Right of Reply, 12 March 2024

Below are responses from key soy traders (ADM, ALZ Grãos, Amaggi, Bunge, Cargill, Cofco, and LDC) to questions from Mighty Earth about their links and commercial relationship to the seven case studies of deforestation in our new Rapid Response Soy Report.

ADM replied on February 26, 2024:

Thanks for reaching out to ADM. We have checked our systems and we do not have Fazenda Sete Barras in Ribeirao Cascalheira (MT- BRAZIL), or the CAR you provided, as a supplier of ADM.

ALZ Grãos replied on March 6, 2024:

ALZ Grãos would like to inform that it does not have commercial relationships with the referenced properties.

In order to guarantee a responsible grain chain, ALZ Grãos' commercialization principles consolidate the implementation of its Sustainability Policy by vetoing the purchase of grains from areas that are subject to: environmental embargoes; Indigenous and Quilombolas Lands; Full Protection Conservation Units; non-compliant areas included in the Soy Moratorium list; areas of producers included in the Official Slave Labor List. Furthermore, ALZ Grãos requires, through a contractual clause, that suppliers comply with environmental legislation.

ALZ Grãos implemented a specialized geoprocessing tool for the traceability of its supply chain, optimizing the monitoring of grains commercialized directly or indirectly. With a database updated daily, the innovative technology provided rapid traceability advances for ALZ Grãos, reinforcing the monitoring and application of company principles.

One of the company's principles, according to its Policy, is to conserve biomes of proven high ecological value (such as the Amazon and Cerrado) with the intention of discouraging the conversion of native vegetation to alternative land use in MATOPIBA, Brazil, as ALZ Grãos' operational scope. The monitoring of deforestation and conversion of native vegetation is carried out at polygon level, with the above-mentioned geoprocessing tool and public geospatial database, as INPE's PRODES layers, and satellite images with different historical dates.

As a reporting mechanism, digital channels are made available to the public on the 'Contact us' area of the ALZ Grãos website, or via email to contato@alzgraos.com.br.

Finally, the company informs that its due diligence process to confirm the regularity of its purchases is continual. Thus, if there is evidence of non-compliance with ALZ Grãos policies in its business, the company will take appropriate measures, such as blocking or suspending the commercial relationship.

Amaggi replied on March 6, 2024:

Thanks for your email and extra time. Below you have our comments.

It is importante to say that were difficult to cross check the deforestation mentioned in the cases with our monitoring system. It would help us if you send more detailed information or the polygonon of the area deforested in the next times.

Please feel free to contact us if you have any further question.

About the farms linked with AMAGGI, the summary of our evaluation is:

Fazenda Senhor Jesus A, B and G (Brasnorte-MT): No commercial relationship was identified between AMAGGI with the mentioned property after the deforestation date.

Fazenda Sete Barras (Ribeirão Cascalheira-MT): No commercial relationship was identified between AMAGGI with the mentioned property after the deforestation date.

Fazenda Rio de Janeiro (Barreiras-BA): AMAGGI don't have operation in Bahia state.

Fazenda Vale do Urso (Barreiras-BA): AMAGGI don't have operation in Bahia state.

AMAGGI has the commitment to remaining deforestation and conversion free (DCF) since 2008 for agricultural production at proprietary farms, *ensuring expansion only in already open areas and having a 100% monitored and traced grain supply chain, that is deforestation and conversion Free (DCF) for agricultural production until 2025, considering all biomes, countries, and regions where it is present.*

Besides that AMAGGI does not trade grain from production areas that have an impact on:

- Embargo by Ibama and state environmental agencies
- Indigenous lands and Fully Protected Conservation Areas
- Areas not in accordance with Green Protocol of Grains in Pará
- Areas deforested after 2008 in the Amazon biome not in compliance with the Soy Moratorium
- Transparency List of Slave Labor

To ensure that the socio-environmental criteria and commitments established are met, AMAGGI developed ORIGINAR 2.0, a platform that allows for the monitoring of the entire grain supply chain. To monitor producer's farms, AMAGGI uses high-quality satellite images, updated on a daily basis. Those images are used exclusively by the company and provide support to predictive monitoring, able to identify potential crop issues that would be difficult to identify without satellite use. All farms registered are monitored by the ORIGINAR 2.0 and the system has a tool to emit fire and deforestation alerts in case any incidents are identified in the area. Those are daily and monthly alerts that help in the territorial and socio-environmental management of properties. All grain purchase lots undergo the 2.0 ORIGINAR geospatial system, and only those 100% in compliance with AMAGGI's minimum trade criteria are able to progress to the following steps to receive grain.

If there are any kinds of restrictions are identified during purchase, the commercialization registration is automatically blocked by the system, and it can only be released upon confirmation from the Sustainability area that the purchase meets the company's socio-environmental

demands. AMAGGI also supports producers with restrictions in their regularization process, through custom guidelines and based on a regularization plan.

The Sustainability area has a team of experts in socio-environmental assessments using geospatial tools, working independently from the Origin area, avoiding conflicts of interest. The company holds clear procedures for approval flows and levels, following the best compliance recommendations. AMAGGI's grain trading contracts are also supported by socio-environmental clauses.

AMAGGI has a confidential whistleblowing hotline, which is open 24/7 and can be accessed via a toll-free number, the company intranet or the website. Whistleblowing complaints are handled by an independent company, in Portuguese, Spanish or English, then referred to the Committee of Ethics & Business Conduct and the Corporate Security Department to be analyzed and investigated.

We reinforce that the areas mentioned in the cases above are current blocked in AMAGGI's purchasing system until we have the guarantee that they will meet AMAGGI's social-environmental criterias again.

You can have more information about AMAGGI's monitoring system at https://www.amaggi.com.br/wp-content/uploads/2023/09/Amaggi_ProgressReport_EN_2022.pdf (pages 32 to 38).

Bunge replied on March 6, 2024:

On behalf of the Bunge Sustainability Team, please find our comment below:

We would like to kindly remind you that Bunge has an established grievance mechanism for allegations of deforestation and other matters related to South America soy. In the future, we encourage you to submit allegations such as those mentioned in your report through the mechanism by using this link.

At this time we have not identified any commercial relationship with the farms in your report.

Bunge's commitment to be free of deforestation and native vegetation conversion in our value chains in 2025 is a central part of the company's business strategy and planning. Bunge does not source soy from illegally deforested areas and has exercised robust monitoring of the socio-environmental conditions in our operations. We use cutting-edge satellite technology to monitor priority areas in South America - over 16,000 farms, covering more than 20 million hectares. Our monitoring can identify changes in land use and soy planting on each of the farms we source from and captures any new cleared lands in the monitored regions.

As a result of our efforts, over 97% of our soybean volumes from Brazil are deforestation and conversion-free. We continue to press our efforts to realize our goal of zero deforestation in 2025.

The majority of our sourcing in Brazil is direct, for which 100% of the volumes are traceable and monitored. This process is also audited every year by a third-party. Our focus is now on reaching 100% traceability and monitored soybean volumes acquired indirectly through third-party resellers. Last year we announced that we overperformed our interim target for indirect traceability: 82% of the purchased volumes in key regions such as the Cerrado are traceable. This

accomplishment is made possible through the Sustainable Partnership Program, a pioneering initiative to support grain resellers in the adoption of socio-environmental verification systems that create traceability and monitoring, thus enabling them to gain visibility into their supply chains. The program has benefits beyond Bunge's operations. It contributes in a definitive way to raising the standards of sustainability and transparency throughout much of the indirect soy supply chain in Brazil, promoting important systemic transformations that benefit the entire sector. Resellers participating in the program have targets and incentives to gradually progress in the traceability of their chains until they reach the monitoring of 100% of their suppliers within the period of the Bunge's 2025 commitment. The Brazilian Institute of the Environment and Renewable Natural Resources (IBAMA, in Portuguese) public list of embargoes and legal compliance checks of all operations is a basic requirement for resellers to participate in the initiative.

Additionally, credible allegations of human rights abuse or other forms of exploitation are not tolerated. Farms that have been identified by the authorities to have engaged in human rights abuse are promptly blocked from our supply chain. Amongst other safeguards, we conduct daily checks of the public list drawn up by the Ministry of Labor and Employment of businesses that have subjected workers to conditions analogous to slavery. We continue to enhance our governance and practices on human rights matters, including establishing a global human rights team in 2022, issuing our global human rights policy in early 2023, and rolling out our new Supplier Code of Conduct in late 2023 and throughout 2024.

More details on our non-deforestation commitment and latest progress can be found in our upcoming global sustainability report, expected to be released in May 2024.

When asked by Mighty Earth if Bunge is sourcing soy from Fazenda Santa Isabel, Bunge replied on March 11, 2024:

Thank you for the follow up message. We reiterate that there are no commercial relationships - direct or indirect - with the previously mentioned farms. For the new allegation regarding Santa Isabel, we kindly request you submit this through so that we may investigate appropriately.

Cargill replied on March 1, 2024:

Thank you for the opportunity to respond to your inquiry prior to the publication of your report.

Cargill does not tolerate illegal deforestation in our supply chains, and we take all allegations seriously.

It is important to note that of the four properties you identified, we do not do business with three of them. For the one property that is in our supply chain, we are investigating the allegations in accordance with our soy grievance process. If a violation of our South America Soy Policy or any of Cargill's policies is found, we will block the farm. Information about grievances and blocked farms in our South America soy supply chain are published on Cargill.com and in our ESG report.

When asked by Mighty Earth which property Cargill would investigate, Cargill replied on March 11, 2024:

We do not release individual names or CARs due to privacy reasons.

Cofco replied on March 5, 2024:

We appreciate the opportunity to respond to the questions and are available for further clarification.

1. Please inform if Cofco's monitoring system had already identified the deforestation case on this farm.

COFCO International's do not have purchase contracts or agriculture financing for this plot.

2. Please state any past or present commercial or other supply chain connection (seed and inputs supply, credit, joint venture, investment, etc.) to the farm unit listed above.

No commercial relationship, past or currently, was found with this declared area (MT-5106190-D1FEA2E36BCF4812BA07FB75F42750A8) according to the area declared in the Brazilian database on April 4, 2023.

3. Please inform us of how you plan to address, monitor or potentially block this specific case of native vegetation clearance.

COFCO International confirms that this CAR was immediately inserted into the company socio-environmental monitoring system and will be monitored daily to avoid non-compliance with our sustainable purchasing policy and our public commitments.

4. Please submit this case to your formal grievance mechanism and ensure the complaint is publicly available.

COFCO International is treating this case as a formal grievance received through direct contact. Please be informed that, while we do not have a public grievance log with case-specific details, we use our Sustainability Report (see page 77 of last year's report) to report annually on the number of grievances handled.

5. Highlight the next steps your company will take to ensure the soy supplier is not destroying natural vegetation, and the soy coming from cleared areas are not part of your supply base.

As previously stated, the company immediately inserted this CAR into its socio-environmental monitoring base to ensure compliance with internal policies and commitments. Every day, the company's systems monitor hundreds of thousands of hectares of national park areas, sensitive biomes and other regions of interest to ensure compliance and protection of these regions.

LDC replied on March 5, 2024:

Please find our answer below:

We are monitoring the Fazenda Sete Barras, however, our system does not indicate deforestation in the indicated CAR according to PRODES methodology, whereas for the DETER system we see an overlap in 2023, though over degraded area with a date prior to the alert, not native vegetation. Please let us know if you disagree with this analysis and advise the data source used in your assessment, so we can further investigate.

Considering our analysis above, we had a soybean origination contract in the last harvest with Fazenda Sete Barras.

We have no commercial connection with Fazenda Rio de Janeiro and Fazenda Vale do Urso.

In line with LDC's commitment to zero deforestation and conversion for agricultural purposes, we are monitoring origination areas in Brazil for all commodities using the PRODES methodology, which we recognize as the most accurate public database nationally. From the end of 2025 onward, areas with validated deforestation or conversion will be excluded from our supply chain, until the farmer takes adequate compensation and remediation actions for such conversion.