



# Rabobank Group Modern Slavery Statement 2025

## 1. Scope of the Rabobank Group Modern Slavery Statement 2025

The reporting entities under the Australian Modern Slavery Act 2018 (Cth) are:

- Coöperatieve Rabobank U.A. (ABN 70 003 917 655) ('**CRUA**');
- Rabobank Australia Limited (ABN 50 001 621 129) ('**Rabobank Australia**'); and
- De Lage Landen Pty Limited Australia (ABN 20 101 692 040) ('**DLL Australia**'), together, the '**Australian Law Reporting Entities**'.

The reporting entities under the UK Modern Slavery Act 2015 are

- CRUA;
- De Lage Landen Leasing Limited ('**DLL UK**'); and
- AGCO Finance Limited ('**AGCO Finance UK**'), together, the '**UK Law Reporting Entities**'.

The Australian Law Reporting Entities together with the UK Law Reporting Entities are the '**Reporting Entities**'<sup>1</sup> for the purposes of this Modern Slavery Statement (hereafter the '**Statement**'). The Australian *Modern Slavery Act 2018* (Cth) and the UK *Modern Slavery Act 2015* are collectively referred to as the '**Acts**' in this Statement. This Statement has been prepared to meet the requirements of the aforementioned Acts in respect of the Reporting Entities and the entities that each Reporting Entity owns or controls (together with the Reporting Entities, the '**Rabobank Group**') for the calendar year of 1 January 2025 to 31 December 2025 (the '**relevant period**'). In this Statement, references to 'we', 'us' or 'our' should be read as a reference to Rabobank Group unless explicitly stated otherwise. References to '**Modern Slavery**' capture slavery and human trafficking as set out under the Acts.

## 2. About Rabobank Group

### Our Structure, Operations and Supply Chains

CRUA has the legal form of a cooperative with excluded liability (*coöperatie U.A.*) formed under the laws of the Netherlands. It has its executive head office in Utrecht, the Netherlands and a history dating back over 125 years<sup>2</sup>. Its statutory seat is in Amsterdam, the Netherlands. CRUA is a credit institution and the parent company of the international Rabobank Group<sup>3</sup> which has a **Workforce** of

over 49,000 individuals including **Employees** and **Contingent Workers**, and operations in 34 countries across Europe, North America, South America, Africa and the Asia-Pacific region. In these regions, CRUA may operate through one or more branches, representative offices, agencies and/or subsidiaries. The international Rabobank Group services Clients mainly in the Retail Banking, Private Banking, Wholesale Banking, Rural Banking, Supplier Finance, Vendor Finance and Property Development sectors.

The main categories of **Suppliers**<sup>4</sup> to Rabobank Group for the relevant period are set out in the table below. In 2025 Rabobank Group had a total of approximately 18,000 Suppliers<sup>5</sup>, of which approximately 56% were located in the Netherlands, 10% in Australia, 8% wider Europe, 8% in Brazil, 8% in the USA, and the remainder elsewhere across the globe.

Category	Description of Goods/Services Provided within each Category
<b>HR and facilities</b>	Including but not limited to human resources such as Contingent Workers as well as products and services related to facility management.
<b>Professional services</b>	Including but not limited to consulting, external legal services, (market) data and banking payments.
<b>IT</b>	Including but not limited to IT hardware, telecommunications, IT software and implementation and other IT services.

## 3. Prevalence, Assessment and Management of Modern Slavery Risks

As a financial institution with a focus on banking the food and agricultural sector internationally, Rabobank Group is linked to risks of Modern Slavery, particularly in its roles as a financial services provider and procurer of goods and services. The risks arise through our relationships with Business Clients and Suppliers, and their respective value chains, especially where operations take place in high-risk industries or countries. In our role as an Employer, based on the Human Rights Impact Assessment ('**HRIA**') completed in 2025, we consider that the prevalence of Modern Slavery risks in our own Workforce is low.

<sup>1</sup> Further detail on Structure, Operations and Supply Chains for the Australian Law Reporting Entities, UK Law Reporting Entities and RBUK are provided in the respective Appendices below, along with detail on their wider group structure where relevant.

<sup>2</sup> Please refer to our [Annual Report 2025](#) for more details.

<sup>3</sup> Note that international Rabobank Group in this paragraph refers to the entire global operation of Rabobank Group which is wider than the scope of Rabobank Group as specifically defined in section 1 (above) for the purposes of this Statement.

<sup>4</sup> We also interact with other non-Supplier third parties and will continue to work on enhancing our centralized oversight of this group into 2026 which may include consideration of Modern Slavery risks. Accordingly for this Statement, we have not included such third parties in considering Modern Slavery risks relevant to Rabobank Group.

<sup>5</sup> Figures in this paragraph capture Suppliers for the material proportion of Rabobank Group, i.e. CRUA and its core financial services related branches and subsidiaries globally. Note that the same Suppliers are also used by a number of the entities owned/controlled by the Reporting Entities. The data reflects all Suppliers that had booked invoices in the year 2025.

As a procurer of goods and services, we note that supply chain pressures such as the drive to reduce costs, widespread outsourcing, and complex logistics often result in opaque supply and value chains, which in turn can increase the risks of Modern Slavery. Such risks further increase where multiple risk drivers such as labor intensity, lower levels of worker protection, and/or high reliance on migrant workforces are prevalent. Approximately 72% of our Suppliers in 2025 were based in Europe or the USA which typically have stringent labor laws and show a lower level of vulnerability<sup>6</sup>.

We set out below the key global policies, standards and procedures<sup>7</sup> that governed our efforts across 2025 with regard to identifying and addressing Modern Slavery risks<sup>8</sup> alongside other actions completed in 2025 and actions proposed to be undertaken 2026 with a view to continuously improving how we assess and manage such risks.



### 3.1. Our Key Policies, Standards and Procedures

Rabobank Group recognizes and is committed to respecting and upholding all human rights under international law, including labor rights as codified in the International Labour Organization ('ILO')'s core conventions and the ILO Declaration on Fundamental Principles and Rights at Work as well as other international human rights frameworks.<sup>9</sup> As we want to play our part in supporting the elimination of Modern Slavery, Rabobank is committed to international standards which support the values of the Acts, including the UN Guiding Principles on Business and Human Rights ('UNGPs') and OECD Guidelines for Multinational Enterprises on Responsible Business Conduct ('OECD Guidelines').

<sup>6</sup> Government Response | The Global Slavery Index and Vulnerability | The Global Slavery Index  
<sup>7</sup> Where this Statement refers to Rabobank Group policies, standards and procedures, these generally apply across Rabobank Group, however these policies, standards and procedures are subject to local legal requirements and thus the operationalization of such policies, standards and procedures may vary in practice between different regions and subsidiaries (including within DLL Group), due to country-specific laws or requirements, and/or due to differing stages of implementation as well as to take into account differing business activities and risks. Where Rabobank Australia Group (defined below), RBUK or any part of DLL Group follows additional or different processes from the rest of Rabobank Group, this has been highlighted within the Statement and/or addressed in the relevant appendices. Within Rabobank Group, we have a formal process under which, in certain cases, temporary waivers and deviations or ongoing exemptions from our policies and standards may be granted (and thereafter will be monitored) by the relevant Global Policy/Standard owners. Further, under Rabobank Group's risk and control

Rabobank Group sets out the conduct we expect our Staff to adhere to across a number of policies, standards and procedures as well as in the Rabobank Group code of conduct ('Compass') available [here](#). The policies and standards relevant to Modern Slavery include (without limitation) those shown below and are subject to regular review. The scope, key requirements and relevance of these policies and standards in managing Modern Slavery risks are elaborated upon in the following sections.

- Global Policy and Standard on Procurement
- Global Policy on Whistleblowing
- Global Policy Against Harassment
- Global Standard on Screening
- Global Standard on Sustainable Development
- Global Standard on Physical Safety & Security
- Global Standard and Procedure on Sanctions
- Global Standard on Customer Due Diligence

## 3.2. Actions To Assess and Manage Modern Slavery Risks in Our Operations

### 3.2.1. In our Role as Employer

In 2025, CRUA carried out a HRIA to identify and assess its most salient human rights risks.<sup>10</sup> The approach, in which we first identified the human rights risks most relevant to our business operations, was informed by human rights risk drivers, internal stakeholder insights, and desk-based research. These risks were then assessed against severity of risk of impacts (determined by scale, scope and remediability) and likelihood of the risks occurring. Taking into account sectoral, business model, geographic and demographic characteristics relevant for a bank, we concluded that the risk of Modern Slavery among our Employees and Contingent Workers was low and that discrimination, harassment and privacy were salient human rights risks.

Rabobank Group undertakes a range of actions in support of the labor rights of Employees and Contingent Workers. These include adherence to applicable labor laws and regulations, pre-employment screening to verify identity and the legal right to work. A Collective Labor Agreement is in place for Employees of CRUA and Obvion N.V (one of its wholly owned subsidiaries) in the Netherlands,

framework, findings of non-compliance (if not subject to waivers, deviations or exemptions) with policies/standards are recorded and remediated through time-bound corrective action plans.  
<sup>8</sup> Note that the particular risk and mechanisms referenced as means by which we seek to manage Modern Slavery risk may not appear in every consecutive annual Modern Slavery Statement we produce. This does not necessarily mean that such tools/mechanisms have ceased to exist, but that other more pertinent tools/means have been recognized or introduced and have been deemed better suited for inclusion in this Statement.  
<sup>9</sup> See for more details the CRUA [Human Rights Statement](#).  
<sup>10</sup> The HRIA included in its scope Employees and Contingent Workers of CRUA, including its branches and its key international subsidiaries that conduct banking activities (please refer to overview in 2.1), and excluding DLL Group. This scope applies where we refer to "we" or "our" in section 3.2.1.

providing additional safeguards based on equality, transparency and structured dispute resolution processes. We also promote a safe, healthy and respectful working environment through the Global Standard on Physical Safety & Security and the Global Policy Against Harassment. Rabobank encourages Employees to speak up about integrity or compliance concerns. Such concerns can be shared with management or a compliance officer. In addition, advice can be asked, or a report of suspicion of wrongdoing can be made under the [Global Policy on Whistleblowing \("GPW"\)](#). The GPW ensures confidentiality, protection against retaliation and supports anonymous reporting. All reports are registered in the dedicated Case Management System and overseen by the Whistleblowing Committee.

### 3.2.2. In Our Role as Financial Services Provider

We conducted sustainability assessments as part of the credit approval process for Business Clients above a certain credit exposure financed by Rabobank Group's Wholesale, Rural or Dutch Retail business lines (and to the extent permitted by local laws or regulations).

The assessment covered the Global Standard on Sustainable Development ('GSSD') requirements and so included, as relevant to the activity of the Business Client, questions on human rights violations, adherence to labor laws and whether due diligence was conducted to identify violations such as forced labor and child labor in their value chain. For wholesale Business Clients deemed high-risk (based on sectors they operate in and financial exposure) a further in-depth sustainability assessment was completed. This assessment covered sustainability risks and performance on topics including human rights violations such as forced labor and child labor, working conditions, and inclusion of human rights as a topic in their sourcing requirements. Any potential issues would be investigated, and depending on the outcome the Business Client would be engaged to reach a solution or agreement to remedy. For example, through the sustainability assessment in 2025 one Business Client was deemed to be non-compliant with Rabobank's human rights and labor rights policy due to severe labor violations, after further engagement, the relationship was terminated in the same year. For the Business Client reported in our 2024 Modern Slavery Statement, as facing allegations of severe labor violations, engagement has continued and the relationship remains under review due to ongoing court proceedings.

We also continued work on designing an enhanced Sustainability Assessment Framework ('SAF'). The SAF proceduralizes and sets governance on how sustainability (including human rights) related risks/impacts linked to

Business Clients should be identified and managed using a risk-based approach. Efforts will continue into 2026, focusing on execution and implementation and may include, for instance, adjustments to the tooling used for the sustainability assessments above.



#### 3.2.2.1. Labor Exploitation

Following from Rabobank Group's 2024 human rights saliency assessment (which identified labor exploitation as a salient human rights risk) we took action during 2025 to address labor exploitation in two ways: (i) integration of labor exploitation into our updated Human Rights policy ('HRP')<sup>11</sup> and (ii) addressing labor exploitation as a strategic focus area:

##### *(i) Integration of labor exploitation in our updated HRP*

- Additional human rights requirements were made applicable to Business Clients operating in sectors with a high risk of adverse human rights impacts, particularly those engaged in high-risk activities. This approach enabled us to apply our HRP proportionately, tailoring expectations based on factors such as business type, sector characteristics, and geographic context. It also considers the Business Client's level of responsibility and control over their value chains. Our sustainability assessment tools were updated in line with the HRP as of January 2026.
- Criteria applicable to Business Clients was strengthened. For example, we included criteria for remediation of actual adverse impacts caused or contributed to by Business Clients. We also included specific commitments on the prohibition of Modern Slavery and the elimination of child labor.

##### *(ii) Addressing labor exploitation via our strategic focus area approach*

As part of CRUA's People Vision and Approach<sup>12</sup> labor exploitation is prioritized as a strategic focus area. In 2025 we explored opportunities to address labor exploitation risks at Business Client and system level in order to develop a Decent Work strategy. Labor exploitation is a risk both in the Netherlands, where our Business Clients are active in sectors such as Dutch horticulture and animal protein (with risks higher in the processing phase such as in slaughterhouses), and internationally in the food and agriculture sector. As such we considered drivers that may contribute to a greater adverse impact on workers in the Dutch horticulture sector.

<sup>11</sup> More information on the sustainability policies and implementation can be found in the [Rabobank Group Annual Report](#).

<sup>12</sup> Detailed information on the saliency assessment, including on the scope and methodology, is set out within Rabobank Group's [People Vision and Approach](#)

We understood that in the Dutch horticulture sector, features (such as high labor intensity and highly season-driven work), could heighten the risk of adverse impacts on working conditions, especially for the migrant workers which the sector relies heavily on. Accordingly, we conducted interviews with internal and external stakeholders (e.g. human rights practitioners, Business Clients, and representatives of sector associations) to broaden our knowledge and further understand which practices are already in place within CRUA and in the sector. Through several pilot projects and knowledge sessions with our commercial colleagues to exchange ideas, best practices and challenges, especially in their interaction with our Business Clients, we gained experience on addressing the risks of labor exploitation and raising awareness for the issue.

### 3.2.2.2. Financial Crime

As a gatekeeper of the financial system, we have a responsibility to prevent the misuse of financial channels for criminal purposes. We acknowledge that both perpetrators and victims of Modern Slavery could utilize our financial products and services (for example bank accounts), and that Modern Slavery can be viewed as a predicate offence to financial crimes.

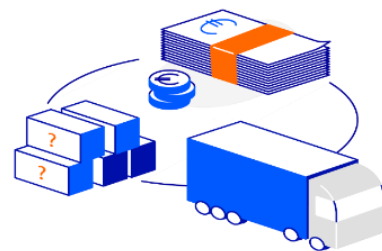
We have a number of global policies, standards, and procedures to support the management of financial crime risks linked to money laundering, terrorist financing, sanctions violations, bribery and corruption, fraud, and tax evasion. Our Customer<sup>13</sup> Due Diligence ('CDD') and Anti-Money Laundering/Counter-Terrorism Finance ('AML/CTF') policies and standards require that CDD is conducted at the Customer acceptance stage and periodically throughout our business relationship, and that Customer transactions are monitored for unusual behavior. CDD includes periodic automated adverse media screening of our Customers with a view to detecting any potential links they may have to human rights abuses and human trafficking.

Through our Global Standard and Procedure on Sanctions, we are fully committed to strict adherence to applicable sanctions laws and regulations which prohibit us from entering into or maintaining banking relationships with, or facilitating transactions involving, individuals or entities subject to sanctions designations, including those linked to human rights abuses and Modern Slavery. We seek to prevent bribery and corruption within our own operations and within Customer-related activities, in line with our Global Standard on Anti-Bribery and Corruption.

<sup>13</sup> Note for this section that the term 'Customer' reflects the terminology used with the financial crime field. For the purposes of this Statement, 'customer' can be understood as synonymous with 'Client'.

<sup>14</sup> COMCRIM refers to 'COMbatting CRIMes' that undermine democracy and the rule of law. COMCRIM is an interdisciplinary Dutch research project in which public and private partners work together to study subversive crime, such as human trafficking, money laundering, and corruption.

During the year (and following on from 2024), the Rabobank Group Financial Economic Crime (FEC) Investigations Department continued to conduct risk-based investigations to monitor CRUA's Dutch Retail business divisions exposure to emerging risks, including Modern Slavery. Insights from any identified instances of Modern Slavery relating to Rabobank Group were shared amongst relevant internal stakeholders to consider and implement mitigating factors as appropriate. Under our Human Trafficking Program, FEC completed a holistic review of investigations, actions and insights gathered over the past seven years, during which time this theme has been, and continues to be, an active area of focus. Insights from this review process continue to be evaluated with the aim of guiding future improvements, including for investigations. FEC also used the insights to conduct knowledge sharing sessions within the FEC division. As a continuation of this effort, two impact and risk analyses are planned to commence in 2026 on criminal exploitation and forced organ removal, both of which are linked to Modern Slavery. These risk-based investigations aim to better understand, identify and prevent emerging risks, as well as translate associated financial crime typologies to create intelligence. Any alerts or suspicions of Modern Slavery will be followed up with appropriate CDD measures, event-driven reviews, and reporting under the relevant law(s) including the Dutch Money Laundering and Terrorist Financing (Prevention) Act, including the filing of any unusual transaction reports with the relevant regulatory authority. Finally, FEC continued participation in public-private-private partnerships focused on combating Human Trafficking (including the COMCRIM<sup>14</sup> and Fieldlab THB<sup>15</sup> initiatives) and maintained active engagement with relevant authorities, subject matter experts and industry peers to further strengthen our expertise.



### 3.2.3. In Our Role as Procurer of Goods and Services

Across 2025, our Suppliers remained in scope of the GSSD as well as the Global Standard on Procurement ('GSP'). The GSP governs our day-to-day procurement activities applied globally in all regions where PRISMA (the system through which the Supplier sustainability risk assessment takes place) was implemented<sup>16</sup>. Accordingly newly contracted Suppliers and existing Suppliers with contracts

<sup>15</sup> LIEC Field Lab Trafficking in Human Beings (THB) strengthens integrated collaboration on urgent societal issues, incl. human trafficking by uniting public and private partners to address undermining activities.

<sup>16</sup> For region Australia & New Zealand, the process for implementation of PRISMA is scheduled to commence in 2026, in the meantime their localized approach to managing Modern Slavery risks attached to Suppliers is in the Appendix below. For RBUK, PRISMA is already in place.

open for negotiation (e.g. due to periodic review) were subject to the following checks/requirements during 2025.

The Suppliers were screened against sanctions and other exclusion criteria. Where Suppliers were expected to show adherence to GSSD requirements (as per internal proportionality rules) we asked them to include our sustainability statement (or a reference to it) in the contractual documentation. The sustainability statement outlined our expectation of a Supplier's compliance with the relevant GSSD acceptance requirements. In addition, where the annual spend on a Supplier was estimated to be 250,000 EUR (Excl. VAT) or above and (additionally since June 2025) at least one procured product or service was deemed 'material' on sustainability, we asked the Supplier to share with us an Independent Sustainability Rating Report from EcoVadis ('Scorecard') within 6 months of signing the contract<sup>17</sup>. The Scorecard rated Suppliers against four fixed themes including labor and human rights, and sustainable procurement in the supply chain. Contractual provisions required the Suppliers to refresh the Scorecard annually in order for it to remain valid. Our Suppliers and their contracts were subjected to ongoing periodic review in accordance with their inherent risk rating and in order to capture changes in their sustainability performance and risks over time, and ensure a valid Scorecard remained in place (as applicable).

In any cases where a Supplier did not accept the sustainability statement and (as applicable) provide a Scorecard, an internal escalation would have occurred for a decision on whether and how to proceed. In such cases, options included granting of a time-limited deviation, in limited circumstances risk acceptance, and ultimately discontinuation of the Supplier relationship.

Aside from the above checks and requirements imposed on Suppliers, and with a view to identifying Rabobank Group's salient human rights risks in its upstream supply chain, we initiated a HRIA in 2025. The HRIA will conclude within 2026 and result in the final determination of high-risk procurement categories linked to our salient human rights risks. Following this, we will undertake a gap analysis to understand how the salient human rights risks in our supply chain are managed and develop actions plans where needed.

## 4. Tracking Effectiveness and Looking Ahead

Whilst we have a number of processes/controls to support the management of Modern Slavery risks commensurate with the prevalence of such risks across our operations and supply chains (as set out above), we continue to focus on ways to improve the identification, mitigation and

remediation of Modern Slavery risks. Accordingly we set out below key actions completed in 2025 and actions planned for 2026 (full details are available in Appendices D and E).

### 4.1. Tracking Effectiveness

We assess effectiveness primarily through tracking progress against goals set in the previous year. One key goal achieved during 2025 was the HRP update which includes a new acceptance requirement for relevant Business Clients in high-risk sectors to explicitly commit to the prohibition of Modern Slavery and the elimination of child labor in line with relevant ILO conventions. In addition, through the HRIA, we enhanced our understanding of salient human rights issues in our own Workforce.

With a view to enhancing awareness on the topic of Modern Slavery, we ran webinars on *Modern Slavery and the Financial Sector* hosted by the Mekong Club. The webinars were attended by Staff from many departments and locations globally, including Australia and the UK, and provided powerful insights into the scale and complexity of Modern Slavery, and the financial sector's critical role in supporting the elimination of it.

Finally, as part of our People approach, we launched a bank wide initiative in 2025 to assess the effectiveness of our grievance mechanisms and remedy processes across our different roles. This review enabled us to align the current approach more closely with our human rights commitments and regulatory obligations and to develop an 'enabling remedy strategy' for human rights grievances raised by rightsholders impacted by activities of our Business Clients.

### 4.2. Looking Ahead: Continuous Improvement in Addressing of Modern Slavery Risks

Key goals planned for 2026 include (i) development of our Decent Work Strategy and (ii) strengthening of our due diligence. Under the first item, we will use insights from stakeholders and pilot projects to create a strategy to address labor exploitation risks in Dutch horticulture. The strategy will aim to capture actions on certification and housing and will guide our approach in other high risk sectors (including animal protein and global food and agriculture chains). To strengthen our due diligence, we will focus on monitoring our Business Clients' performance, accounting for proportionality factors and labor exploitation risks.

<sup>17</sup> The requirement to provide a Scorecard has applied to contracts since February 2022. For legacy contracts before that time, the Scorecard is requested. We requested the Scorecard for existing/legacy contracts from time to time, for example when the contract is due for renewal.

As part of the general ongoing effort to strengthen our processes to identify and address Modern Slavery risks and impacts, we will continue to engage in dialogue between different parts of the Rabobank Group and within the Rabobank Global Modern Slavery Working Group ('MSWG') (see description further below) with a view to understanding particular exposure to Modern Slavery risks and actions needed or taken to address such risks.

## 5. Consultation Process & Approval Statement

This Statement has been prepared in accordance with the requirements of the Australian Modern Slavery Act 2018 (Cth) and s.54 of the UK Modern Slavery Act 2015.

This Statement was prepared jointly by the Reporting Entities through the MSWG. The MSWG is comprised of representatives of the relevant functions/departments<sup>18</sup> across the Reporting Entities, including (but not limited to) Sustainability, Financial & Economic Crime, Procurement and Vendor Management, Compliance, Legal, Human Resources and Facilities. Working group discussions focused on identifying any changes to the content included in the previous Modern Slavery statement (which was used as a base for this Statement), and identification of new developments/achievements for inclusion. A selection of representatives from business units were separately asked to provide input on this Statement.

Additional consultations were held with entities owned or controlled within Rabobank Group. The consultation process involved engaging with the relevant representative(s) of each such entity<sup>19</sup> to understand their business activities and operations, so as to identify which entities' profiles gave rise to different Modern Slavery risks and/or mechanisms to manage such risks as compared to the financing activities of Rabobank Group. Further interaction took place with those entities, more specifically they were asked to review a draft of this Statement and confirm that the content suitably covered or caveated their way or working regarding management of Modern Slavery risks.

### 5.1. Approval Statement

This Statement has been approved the following principal governing bodies of the Reporting Entities for the year ending 31<sup>st</sup> December 2025.

1. Managing Board of CRUA
2. Board of Rabobank Australia
3. Board of AGCO Finance UK
4. Executive Committee of DLL UK<sup>20</sup>
5. Board of DLL Australia

**Stefaan Decraene**  
Chair and Member of the Managing Board,  
Coöperatieve Rabobank U. A.

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**Vincent Maagdenberg**  
Chief Risk Officer and Member of the Managing Board,  
Coöperatieve Rabobank U. A.

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**Caroline Oosterbaan**  
CEO and Director,  
Rabobank Australia

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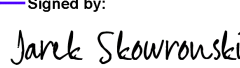
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**Mike Partington**  
Managing Director,  
De Lage Landen Pty Limited Australia

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**Jarek Skowronski**  
General Manager,  
De Lage Landen Leasing Limited

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**Nick Fulford**  
General Manager,  
AGCO Finance Limited

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<sup>18</sup> Where these functions and departments sit within CRUA, they generally conduct their role with a global view

<sup>19</sup> Note that this Statement does not exhaustively list all entities owned or controlled by the Reporting Entities. In addition, where such owned /controlled entities were sold, liquidated,

dissolved or otherwise had very limited activities during 2025 (e.g. special purpose vehicles), they were not included in considering Modern Slavery risks relevant to Rabobank Group, nor consulted with in the drafting or approval of this Statement.

<sup>20</sup> Since superseded by the Statutory Board of Directors DLL UK.

# Appendix A – Additional Information on Rabobank Australia Group

## Structure, Operations and Supply chains

In Australia, CRUA has both a branch and subsidiaries. The branch is registered as a Foreign Company under Australian Registered Body Number (ARBN) 003 917 655 and Australian Business Number (ABN) 70 003 917 655. In this Appendix, where we refer to 'Rabobank Australia Branch' it is a reference to the operations of CRUA in Australia via its branch.

## CRUA also has the following wholly owned subsidiaries operating in Australia:

- Rabobank Australia Limited - ABN 50 001 621 129
- Rabo Australia Limited- ABN 39 060 452 217
- Rabo Equipment Finance Limited -ABN 37 072 771 147
- Soft Commodity Trading Pty Limited- ABN 45 085 595 562
- GrainCorp Pools Pty Limited (noting that this entity was deregistered on 24 February 2025).

Where in this Appendix, we refer to 'Rabobank Australia Group' it means these subsidiaries together with Rabobank Australia Branch and excludes the DLL Group entities which have been outlined separately below. All of the Rabobank Australia Group entities have common management, Staff and premises in Australia. Rabobank Australia Group is managed locally by the Chief Executive Officer ('CEO') and an executive team which reports to the CEO. The Rabobank Australia Group CEO has delegated authority from the Managing Board of CRUA (as Rabobank's Regional Manager for Australia and New Zealand) and from the Board of Rabobank Australia to fulfil the CEO's roles and responsibilities. The Senior Officer Outside Australia ('SOOA') also has responsibilities in relation to the conduct of Rabobank Australia Branch. The SOOA is appointed by the Managing Board of CRUA. Rabobank Australia has a board consisting of 4 non-executive independent directors<sup>21</sup>, 2 non-executive, non-independent directors, and 1 executive director.

Rabobank Australia Group is an agricultural lender providing rural, wholesale and retail banking services through its authorized deposit-taking institutions in Australia. The Rabobank Australia Group serves Clients across farming, corporate and online savings markets,

offering deposit products, loans, equipment finance, transactional banking and a range of risk management solutions. It also undertakes food and agribusiness research, education and events. Rabobank Australia Group employs nearly 1,300 people and operates 60 offices nationwide, predominantly in rural areas.

Rabobank Australia Group's supply chain is built around supporting Australian businesses and technological infrastructure required for operations. Approximately 97% of a total of 1,700 external service arrangements are with Suppliers based in Australia with the remaining 3% based offshore, mostly in the EU, USA and UK. Additionally, CRUA, based in the Netherlands, is also a Supplier of services to Rabobank Australia Group.

## Key Policies, Standards and Procedures

For Rabobank Australia Group, the global policies (referred to in section 3.1 above) are supported by additional local policies, standards and procedures which include the following (without limitation):

- Anti-money laundering & counter-terrorism financing policies, systems and controls
- Local Policy on Whistleblowing
- Local Policy on Harassment, Bullying and Discrimination
- Local Policy on Financial Crime Compliance
- Local Standard on Anti-bribery and Corruption
- Local Standard on Service Provider Arrangements
- Local Standard on Reporting Unacceptable Behavior

## Employees and Contingent Workers

Further to section 3.2.1 above, the majority of Rabobank Australia Group Employees are engaged by Rabobank Australia Branch and are therefore covered by the Fair Work Act 2009 (Cth), the Banking, Finance and Insurance Award 2020, relevant work health and safety legislation, and individual employment contracts. Direct employment arrangements provide Rabobank Australia Group with clearer visibility over employment conditions and help reduce certain common Modern Slavery risk factors.

Less than 2% of the Workforce comprises onshore third party labor hire workers who are subject to the same Fair Work and work health and safety legislative protections as Rabobank Australia Group. Further, Rabobank Australia Group provides multiple channels for raising concerns, including confidential and anonymous reporting through a 24/7 externally managed hotline and web portal under its Local Whistleblowing Policy. Support is also available through the Local Policy on Harassment, Bullying and Discrimination.

<sup>21</sup> An additional non-executive independent director was appointed in March, which brings the total to 4 on Rabobank Australia's Board.

### *Clients and their Value Chains*

Rabobank Australia Group screens Clients and related parties including for adverse media—including Modern Slavery indicators—at onboarding and through daily automated monitoring. Periodic reviews occur based on risk. Any alerts will trigger an investigation, where appropriate, escalate to FEC Investigations, suspicious matters are reported to AUSTRAC as required. We also screen relevant compliance and sanctions lists covering areas including crimes against humanity, human rights abuse, human trafficking and labor violations.

### *Supply chains*

Following section 3.2.3 above, Rabobank Australia Group following the Supplier due diligence at onboarding, an adverse media screening is conducted daily, while other assessments are refreshed based on Supplier risk rating. A Modern Slavery risk assessment is also undertaken through the Supplier questionnaire supporting the identification of potential Supplier-related risks and informing decisions on next steps, which may include escalation or disengagement.

Suppliers assessed as high Modern Slavery risk (based on industry risk or annual spend exceeding AUD 1 million) provided a Modern Slavery statement or completed Rabobank’s Modern Slavery questionnaire. These assessments were reviewed at onboarding and at each contract renewal. In 2025, 180 new Suppliers were onboarded, nine of which were identified as high Modern Slavery risk. Further analysis was conducted on these Suppliers, and they proceeded through onboarding in line with internal requirements.

### *Tracking Effectiveness & Looking Ahead*

Rabobank Australia Group maintains a local cross-departmental working group comprising of representatives from Sustainability, Legal, Risk, Compliance, Vendor Management, Human Resources, Rural and Wholesale Business Units. The working group supports oversight and coordination of Modern Slavery risk management activities. In 2025, a review of the Modern Slavery response document was initiated, along with updates to the local procedure that informs contributions to this Statement. The response document sets out steps to be followed when a potential Modern Slavery incident is identified. The updates are expected to be finalized and made available internally in 2026.

Two activities were completed including a sample review of current Suppliers to assess process compliance and an internal evaluation of the Supplier assessment process. In response, a Modern Slavery Assessment Guidance document was developed which sets out trigger criteria, assessment steps, and roles and responsibilities to support consistent due diligence. Integration of this guidance into onboarding and review workflows is planned for 2026. Rabobank Australia Group is also considering additional targeted training for key stakeholders involved in the vendor management lifecycle to further support capability development in identifying and assessing Modern Slavery risks.

Employee capability building remained a focus in 2025. A total of 217 employees were assigned Modern Slavery e-Learning, with a 96% completion rate. The training module was reviewed in 2025 and will be rolled out in Q1 2026 to all Employees.

Rabobank Australia Group also continued its participation in the Australian Banking Association Working Group on Human Rights, contributing to industry-wide approaches to addressing Modern Slavery risks across supply chains and Client bases.



## Appendix B - Additional Information on RBUK

### *Structure, Operations and Supply chains*

In the United Kingdom, CRUA has a branch and a subsidiary. RBUK is the branch of CRUA and is registered with Companies House in the UK under Company No. FC011780 and UK Establishment No. BR002630. CRUA also has one wholly owned subsidiary in the UK, Rabo Holdings (UK) Limited, which is registered with Companies House under Company No. 03855638. However, the subsidiary does not conduct any business activities nor have any Employees hence does not have any direct Modern Slavery risks within its operations or supply chain other than those which are reported by CRUA within this Statement. Consequently, it is not commented on within this Statement. CRUA's UK business focuses on corporate banking and markets activity exclusively with Business Clients, primarily conducted through RBUK, which has supported the UK Food and Agribusiness for over 40 years and has a Workforce of over 600 people. In line with CRUA globally, the UK business is aligned to three key strategic priorities: banking for Food, banking for Energy and banking for Europe. UK offerings include debt products, receivables & payables finance and a range of hedging and risk management products.

RBUK's supply chain is built around supporting its UK business and technological infrastructure. RBUK utilizes external Suppliers predominantly for the purposes of providing IT software and hardware, office supplies, food and catering, cleaning and security. RBUK also utilizes Suppliers to support hiring, training and Staff benefit programs, as well as for providing ad-hoc professional advisory services.

### *Key Policies, Standards and Procedures*

For RBUK, the above global policies, standards and procedures (see section 3.1 above) are supported by the following local Policies (without limitation): UK Whistleblowing Policy; UK Health & Safety Policy; UK Anti-Bullying, Harassment and Sexual Harassment Policy; UK Grievance Policy

### *Employees and Contingent Workers*

Further to section 3.2.1, Key policies supporting RBUK Staff include the UK Anti-Bullying, Harassment and Sexual Harassment Policy, which sets out how RBUK prevents and addresses inappropriate behavior, and the UK Grievance Policy, which enables Employees to raise workplace concerns. The UK Whistleblowing Policy allows Staff to report issues—including Modern Slavery—confidentially or anonymously. Employees also have free confidential support through an external Employee assistance

program. They may raise concerns with the Safe Persons team, which offers a confidential route for reporting potential Modern Slavery indicators and other issues such as bullying, discrimination, or harassment. Until the end of 2025, Staff also had access to Protect, an independent whistleblowing charity.

### *Clients and their Value Chains: Financial Crime*

RBUK screens UK Clients and financial counterparties for adverse media, including Modern Slavery related indicators, at onboarding. Clients are then subject to daily automated checks and periodic reviews every one to five years, depending on their risk rating. Any alerts will trigger an investigation, and where suspicious activity is identified, RBUK may take actions including reporting to the Financial Intelligence Unit in accordance with applicable regulatory obligations.

### *Supply chains*

Following from section 3.2.3, as a London Living Wage employer, RBUK ensures that Suppliers providing Contingent Workers meet London Living Wage requirements. Suppliers are vetted and accredited in line with UK industry standards, and RBUK follows the Institute of Workplace and Facilities Management's Professional Standards Handbook. Suppliers undergo Modern Slavery related adverse media screening at onboarding, with daily monitoring and periodic reviews every one to five years in accordance with their risk rating. Medium- and high-risk Suppliers with turnover above £36 million must share their Modern Slavery statement in line with the UK Modern Slavery Act.

### *Tracking Effectiveness & Looking Ahead*

Following RBUK's participation in the Modern Slavery webinar (see 4.1 above) key messages were reinforced by sharing learning materials. Building on this foundation, RBUK aims to run UK-focused Modern Slavery training in 2026 deepening Employees' understanding of how Modern Slavery risks can arise within financial services.



# Appendix C - Additional Information on DLL Group

## Structure, Operations and Supply chains

De Lage Landen International B.V. ('DLL International') is a wholly owned subsidiary of CRUA. DLL International and its subsidiaries, including DLL Australia, DLL UK and AGCO Finance UK, are collectively referred to as the 'DLL Group'.

DLL International is the DLL Group's holding company and has a banking license under Dutch law. The company is located in, and has its statutory seat in, Eindhoven, the Netherlands. DLL Group has subsidiaries, branches and activities in over 25 countries. DLL Group is a global asset finance partner for equipment and technology, providing asset-based financial solutions to **DLL Customers** across a wide range of industries, including agriculture, clean energy, construction, food, healthcare, industrial and office equipment, technology, and transportation. DLL supports across the entire asset lifecycle by delivering solutions that help move assets to market. This includes both inventory finance and retail finance. DLL's main financial products are operating leases, hire purchase agreements, finance leases, and loans. In 2025, the DLL Group employed 6,178 **DLL Employees**<sup>22</sup> globally. Within this, DLL Australia employed 319 people, while DLL UK and AGCO Finance UK employed 385 people<sup>23</sup>. DLL Group employed nearly 295 **DLL Contractors** through various **DLL Suppliers** in most of the countries where it operates.

DLL Australia is a wholly owned subsidiary of DLL International. AGCO Finance Pty Limited Australia ('AGCO Finance Australia') is a joint venture between DLL Australia and AGCO Australia Pty Limited (AGCO Australia) to provide equipment finance to AGCO Australia's Business Clients in Australia. As AGCO Finance Australia outsources the management of its business to DLL Australia and has no Employees or premises, references to DLL Australia include AGCO Finance Australia for the purpose of this Statement. DLL Australia's procurement and business relationships included approximately 250 general **DLL AUS Suppliers** (such as IT, professional advisory services, premises, and office supplies) and 3,000 DLL AUS Suppliers for equipment, with over 90% based in Australia. Of the less than 10% of DLL AUS Suppliers based offshore, most are located in the European Union, United States of America, United Kingdom, New Zealand, China, and India.

DLL UK is a wholly owned subsidiary of De Lage Landen Limited United Kingdom, which in turn is a wholly owned subsidiary of DLL International. AGCO Finance UK is a joint venture between DLL UK and AGCO International Limited, that is 51% owned by DLL UK. For DLL UK, and AGCO Finance UK, the supply chain includes but is not limited to IT, office, stationery, catering, and cleaning services.

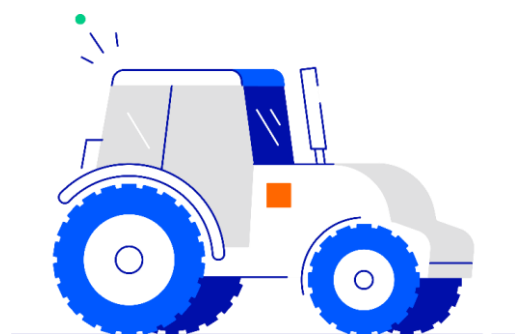
## Key Policies, Standards and Procedures

The Rabobank Group policies set out in section 3.1 above are supported by further policies which account for the operations and value chains of DLL

DLL Group Policies, Standards & Procedures	
Global Standard on Environmental, Social & Governance Risk Management <sup>24</sup>	Global Policy & Global Standard on Procurement and Supplier Management
Global Speak Up Policy	Global Policy on Member Complaints
Global Policy Against Harassment and Discrimination	Global Policy on Financial Crime Compliance
Global Standard on AML/CTF	Global Standard on Sanctions
Global Third Party Due Diligence Procedure	Global Procedure on Name Screening
Global Procedure on FEC Offboarding	

DLL Australia Policies (linked to DLL Group Policies)
DLL Australia Policy on Modern Slavery <sup>25</sup>

DLL UK Policies (linked to DLL Group Policies)
DLL UK Policy on Slavery and Human Trafficking
DLL UK Health & Safety Policy
DLL UK Grievance and Whistleblowing Policy



<sup>22</sup> The Term 'DLL Employee' in this Statement means fixed term and permanent employees whose contract is directly with DLL Group (note that the figure above indicates the average number of full-time equivalents ('FTEs)).

<sup>23</sup> Per 31 Dec. 2025.

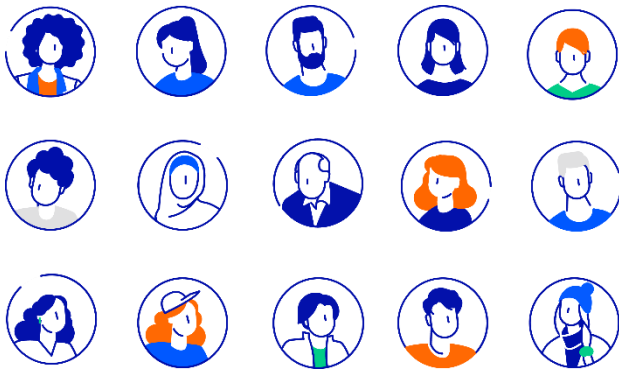
<sup>24</sup> DLL Group does not have a standalone Human Rights policy or Human Rights and Labor Rights standard. However, it adheres to the requirements set out in the Rabobank Global Standard on Sustainable Development, which includes provisions on Human Rights and Labor Rights.

<sup>25</sup> Effective from 10 September 2025.

**Employees and Contractors**

Further to section 3.2.1 above and in alignment with Rabobank Group, DLL Group promotes a high standard of integrity across DLL Group organization and strives to provide its DLL Employees with a safe and supportive working environment. DLL Group’s Global Speak Up Policy supports DLL Employees and Contractors to raise concerns about unethical conduct, wrongdoing or malpractice within DLL, including Modern Slavery, without fear of retaliation, subsequent discrimination, disadvantage or dismissal due to raising such a concern or suspicion and sets out a grievance mechanism for DLL Employees in this respect. The opportunity to raise concerns is also available to external **DLL Reporters** through the DLL Group website.

In addition, DLL Group’s Global Policy against Harassment and Discrimination stipulates that DLL Group is committed that all DLL Employees are treated and treat each other fairly, with dignity and respect, acknowledge and value diversity, equity and inclusion, and strives to create a work environment which is free from any form of disrespectful behavior, bullying and harassment. DLL Group encourages DLL Employees to speak freely to their manager, HR representative, compliance, or legal colleague, or a member of the Speak Up Committee about any issues they face and to resolve conflicts through open dialogue. If a DLL Employee is uncomfortable using the reporting methods described above, they may alternatively raise their concerns through one of DLL Group’s various Speak Up channels, as outlined in the Global Speak Up Policy. All DLL Employees globally are required to complete the annual mandatory Speak Up training.



<sup>26</sup> An industry term capturing the collective sectors that provide food and drink services outside the home, namely of Hotels, Restaurants and Catering.  
<sup>27</sup> The 2024 Rabobank Group (incl. DLL) human rights saliency assessment outcomes were used to support this approach.  
<sup>28</sup> RepRisk provides an external report that can help companies and investors understand ESG risks associated with specific companies. It screens over 150,000 public sources and stakeholders daily in 23 languages, including print and online media, social media, government bodies, and more, to identify ESG risk incidents. Their research covers 28 ESG issues and 80 topic tags, offering universal coverage of companies regardless of size, sector, or location. RepRisk’s methodology is

**Customers and their Value Chains**

Following the Rabobank Group approach set out in section 3.2.2 above, DLL Group acknowledges the potential exposure to Modern Slavery risks arising from its Customer relationships. To mitigate these risks, DLL Group has implemented several processes designed to identify, assess, and address such risks.

DLL Group’s Global Standard on Environmental, Social & Governance (ESG) Risk Management aligns with Rabobank Group’s GSSD. Under this Standard, DLL Customers undergo an ESG risk assessment covering amongst others human rights risks, across both Credit Risk and FEC processes. Customer Due Diligence reviews include periodic adverse media screening of DLL Customers with a view to detecting potential links they may have to human rights abuses. Daily automated screenings monitor sanctions and other exclusion lists, including human rights indicators. Both assessments are risk-based and proportional, with checks tailored to the relevant sector, activities, and exposure. If ESG risks exceed DLL’s risk appetite, DLL may engage with the DLL Customer to remediate. If issues remain unresolved within agreed timelines, DLL may disengage where legally permissible, following the Global Procedure on Customer Offboarding.

In addition to the above, DLL Australia conducts sales-team visits (based on risks and exposure) to dealers and Business Clients with Staff reporting any unusual observations.

**Supply chains**

For DLL Group, goods/services provided by DLL Suppliers include (without limitation) marketing and communications, human resources, events, IT products/services, HoReCa<sup>26</sup> and leisure, sustainability platforms, facilities, legal, consulting and finance.

DLL Group follows the DLL Global Procurement and Supplier Policy. Due diligence is performed on DLL Suppliers using a risk-based and proportionality-driven approach<sup>27</sup>. Due Diligence checks include screening against international sanctions and exclusion lists. Furthermore, Group Sustainability conducts adverse media screenings (supported by RepRisk<sup>28</sup> report insights) to identify potential human rights violations. DLL Suppliers may also be requested to accept the DLL sustainability statement<sup>29</sup>. All Tier 1 DLL Suppliers<sup>30</sup> must share a valid EcoVadis Scorecard within six months of the contract start date. Where a DLL Supplier does not meet requirements, internal escalation determines next steps.

issues- and event-driven, and their data history spans back to January 2007, providing over 15 years of consistent data.  
<sup>29</sup> The sustainability statement incorporates the acceptance requirements as set out in DLL’s Global Standard on ESG Risk Management, including those requirement related toto Human Rights, and outlines our expectation of a Supplier’s compliance with those requirements.  
<sup>30</sup> Tier 1 DLL Suppliers are DLL Suppliers providing critical or important function outsourcing, critical data/core data process/systems applications or have a direct contribution to DLL’s strategy.

The Policy is reviewed annually to ensure it remains effective in mitigating risks in DLL Group’s supply chain.

During onboarding, DLL UK and DLL Australia require confirmation of whether the applicable Modern Slavery Act applies to the relevant DLL Supplier/DLL AUS Supplier and, if so, confirmation that a Modern Slavery Statement has been submitted or published. Many DLL AUS and DLL UK Suppliers already report on their supply chains in their own Modern Slavery Statements and have governance frameworks to identify and minimize risks.

DLL Australia and DLL UK assessed that agriculture, construction (in Australia and the UK), solar panel manufacturing, and cleaning services (in Australia) present elevated sector risk for Modern Slavery within their markets. These insights inform their broader Supplier-risk awareness.

*Tracking Effectiveness & Looking Ahead*

In 2025, DLL Group did not yet have a dedicated Modern Slavery sub-category in its Speak Up system. Nevertheless, such concerns could still be reported, as criminal offences and human rights violations were already within scope of the reporting. In 2026, DLL will introduce a separate category — “Criminal Offence – Modern Slavery” — to enhance the identification and tracking of potential Modern Slavery related reports.

Regarding DLL Customer complaint handling, a working group started reviewing new categorization options for the Customer Relationship Management (CRM) system. This includes the potential introduction of ESG-related categories, with Modern Slavery specifically captured under the Social (‘S’) dimension.



DLL Australia has a cross departmental working group (Senior Management, Human Resources, Legal, Compliance) that assesses and reports on Modern Slavery risks. To ensure ongoing awareness, Modern Slavery and human trafficking training is included in onboarding for all new members and refresher training is offered annually to all DLL Australia’s Employees. In 2025, DLL Australia strengthened its approach by adopting a dedicated Modern Slavery Policy and assigning clear accountability for due diligence activities to the operational teams carrying them out. This has increased awareness, improved ownership of risk controls, and enhanced the effectiveness of Modern Slavery risk identification and due diligence processes. The working group continues to refine these processes each year and evaluates the effectiveness of measures taken to ensure they remain fit for purpose.



DLL UK has a Regulatory Committee, comprising Heads of Compliance, Legal and Risk, that oversees Modern Slavery risk and reviews an annual assessment to set the next year’s actions. In 2025, DLL UK enhanced Modern Slavery training, achieving 100% completion, with onboarding Staff required to complete the same training. In 2026, the annual Modern Slavery risk assessment will be strengthened to identify additional risk indicators, followed by enhanced due diligence for DLL Suppliers meeting certain thresholds. This consists of supply-chain and ownership mapping and adverse-media checks. DLL UK will also introduce additional DLL Supplier-onboarding controls to help identify Modern Slavery risks and trigger enhanced due diligence where needed.

## Appendix D - Actions Completed in 2025

Entity & Area of focus		Desired outcome	Actions set for 2025	Detail
<b>Rabobank Group</b>	Modern Slavery risks/ impacts in our own operations.	Enhanced insights regarding the nature of our impact (cause, contribute or directly linked to).	CRUA to enhance understanding of the nature of its impact in terms of causing, contributing or being directly linked to Modern Slavery (as per the Australian Modern Slavery Act).	Enhanced insights were gained with regard to various roles held by Rabobank Group. This was done through the HRIA.
	Tracking effectiveness.	Mechanisms for tracking effectiveness of our Modern Slavery actions/ efforts.	Consider possible KPIs for measuring the effectiveness of our efforts to identify and address Modern Slavery practices in our operations and supply chains.	Multiple options were considered however maturity levels were not deemed sufficient to establish a KPI at this stage. The Group MSWG will continue to explore mechanisms to track effectiveness as part of its general ongoing efforts.
	Modern Slavery cases.	Any Modern Slavery cases identified have been followed up in a timely manner.	Ensure any new cases identified in 2025 are followed up in a timely manner.	In respect of a new case that was identified in 2025, following engagement with the Business Client, the relationship was exited.
	Training and awareness.	Build awareness of Modern Slavery risks.	NA - no specific actions were set for 2025.	The Group MSWG ran webinars on Modern Slavery hosted by the Mekong Club (see section 4.1 above). Further opportunities for training will continue to be considered on an ongoing basis.
	Policies and standards.	Inclusion of Modern Slavery within updated Human Rights policy.	Modern Slavery to be included in the updated Human Rights Policy ('HRP'). Group Sustainability team to consider communication/training following the HRP update as a means to extend awareness of Modern Slavery.	The HRP was updated following the human rights saliency assessment on Clients and their value chains (see 3.2.2. above). This included new criteria in relation to Modern Slavery. The Updated HRP will be published in early 2026 with communication and any required training to follow.
	Group insights.	Enhanced understanding of how Modern Slavery risks sit across Rabobank Group.	CRUA to engage in dialogue across different parts of the Bank with a view to understanding their particular exposure to Modern Slavery risks and any actions needed or taken to address such risks.	As part of the consultation process, discussions took place with entities owned or controlled by CRUA with a view to understanding their particular exposure to Modern Slavery risks and how this was managed.
<b>Rabobank Australia Group</b>	Supply chain: strengthen our actions to address Modern Slavery risks within our supply chain.	Adoption of measures to strengthen the identification, prevention and mitigation of Modern Slavery risks in our supply chain.	Implement the updated Supplier management process in 2025.	Implemented the updated supplier management process and reviewed high-risk suppliers to ensure compliance and identify improvements. Preparing to update risk factors in the vendor management system for further improvement.
			Expand the scope of our internal review of Modern Slavery risks within our supply chain.	Reviewed and updated the Supplier Questionnaire.
			Conduct a Sample Check of Suppliers onboarded to ensure Employees are accurately identifying Modern Slavery risk in accordance with our Modern Slavery processes.	Sample Check of current Suppliers by screening them. Additional guidance to be integrated into the current procedure in 2026.
	Internal capability: empower Employees to know their human rights and identify Modern Slavery.	Enhanced Employee understanding on how our provision of banking and finance services can directly or indirectly contribute to the risk of Modern Slavery, as well as how to respond when they are identified.	Review and uplift e-learning training to be delivered in 2026.	Knowledge sessions on identification, prevention and mitigation of Modern Slavery risks on request.
			Explore possibility to host a webinar in Q4 to increase internal capability and knowledge around Modern Slavery risks.	Rabobank Australia Group ran a local webinar hosted by The Mekong Club. In addition, informative slogans regarding Modern Slavery were displayed in the Sydney Head Office across Dec 2025. Knowledge sessions on identification, prevention and mitigation of Modern Slavery risks on request.
Increase Employees' knowledge of Clients' operations to identify the risk of Modern Slavery in their business.	Strengthened identification, prevention and mitigation of Modern Slavery risks in our Client portfolio, through continuously working with our portfolio managers.	Build on 2024 review of the Human Rights & Modern Slavery related questions in the Sustainability Assessment Tool, and enhance Modern Slavery question in 2025.	Rural Client Photo transitioned to Sustainability Assessment tool which includes additional content on human rights. Additional Modern Slavery questions reviewed in the Sustainability Assessment Tool.	
<b>DLL Group</b>	Training and awareness.	Enhanced awareness of Modern Slavery risks.	NA - no specific actions were set for 2025.	<ul style="list-style-type: none"> <li>DLL Group members were invited to attend a Thematic Meeting on Human Rights that also touched upon Modern Slavery.</li> <li>DLL Group updated and rolled out the Supplier sustainability statements.</li> </ul>
<b>DLL UK</b>	Training and awareness.	Enhanced awareness of Modern Slavery risks.	DLL UK to provide updated and enhanced Modern Slavery training to all UK-based members (new and existing).	DLL UK enhanced and completed mandatory training on Modern Slavery for all UK members.
<b>DLL Aus</b>	Training and awareness.	Enhanced awareness of Modern Slavery risks.	<ul style="list-style-type: none"> <li>Continue to hold cross-departmental working group to assess and report on Modern Slavery risks within business</li> <li>Continue running Modern Slavery focused training for new members and existing members</li> </ul>	<ul style="list-style-type: none"> <li>Working group held comprising of representatives from Senior Management, HR, Legal and Compliance to assess and report on the risks of Modern Slavery within its business.</li> <li>DLL Australia completed Modern Slavery risk awareness training as part of onboarding for new members, and annual mandatory training on Modern Slavery risks for all members.</li> </ul>
	Policy & Standards	Strengthened approach on Modern Slavery.	NA - no specific actions were set for 2025.	DLL Australia strengthened its approach by adopting a dedicated Modern Slavery Policy.
	Risks & Controls	Formalized responsibility for identifying Modern Slavery risks.	NA - no specific actions were set for 2025.	DLL Australia assigned accountability for due diligence activities to the operational teams carrying them out.

## Appendix E– New & Existing items for Action in 2026 and Beyond

Entity and Area of Focus		Desired outcome	Actions set in 2025	Status for 2025 and action(s) for 2026 and beyond
Rabobank Group	Modern Slavery cases	Any Modern Slavery cases identified are followed up in a timely manner.	Relevant team to complete engagement with Business Client identified as non-compliant with human rights and labor rights policy in 2024.	Ongoing: Engagement continued with the Business Client and is expected to continue into 2026 due to the Business Client's ongoing court proceedings. See section 3.2.2 also.
	Identification, prevention and mitigation of Modern Slavery risks	Enhanced understanding of Modern Slavery risks related to Clients and their value chains.	Group Sustainability team to further embed the Sustainability component of the global Risk Control Framework through tailored guidance for users.	Ongoing: Work commenced on scoping and control enhancements and will continue into 2026. In time this will support identification/ management of human rights related risks.
		Enhanced understanding of Modern Slavery risks related to Suppliers.	Group Sustainability to lead performance of the HRIA for the role of procurer (direct supply chain only).	Ongoing: HRIA was preliminarily completed and will be finalized with internal stakeholders. Thereafter salient risks will be determined, gap analysis performed, and action plan created.
			Group Procurement and Vendor Management teams to update Supplier sustainability statement in light of updated HRP.	Ongoing: Update was not possible as the HRP did not take effect until Jan 2026. to be completed in 2026.
	Sustainability Assessment Framework ('SAF')	Strengthen how GSSD requirements relating to human rights and labor rights (i.e. relevant to Modern Slavery) are applied in practice.	Consider how sustainability performance monitoring tools (e.g. EcoVadis) may be further utilized to manage Modern Slavery risks. Enhanced SAF for Business Clients and Suppliers, which governs how GSSD requirements are applied in practice.	Ongoing: Discussions commenced and will continue in 2026. Ongoing: Work continued on the Business Client and Supplier SAF and will carry across into 2026.
	Enabling People Vision	Finalized Decent Work Strategy.	NA – new for 2026.	New: Group Sustainability to establish Decent Work Strategy in 2026 (with focus on sectors with high labor exploitation risk).
Reviewed grievance mechanism landscape and remedy approach.		NA – new for 2026.	New: Develop an 'enabling remedy strategy' for human rights grievances raised by rightsholders impacted by activities of our Business Clients.	
Rabobank Australia Group	Governance processes for addressing Modern Slavery risks within our operations	Raised awareness of our grievance and complaints mechanism to internal stakeholders.	Review Modern Slavery Response Document & Compliance Guide.	Ongoing: Reviews of the Modern Slavery Response Document and related compliance policies were completed. The Modern Slavery Response Document will be published internally in 2026.
		Updated local procedure.	Continue review of local procedure for drafting the Modern Slavery statement.	Ongoing: A review of the local procedure was completed. The procedure will be finalized and published internally in 2026. Will also explore need for a central register of Modern Slavery matters.
	Our supply chain	Continue to adopt measures to strengthen the identification, prevention and mitigation of Modern Slavery risks in our supply chain.	Expand the scope of our internal review on Modern Slavery risks within our supply chain.	Ongoing: the Supplier questionnaire was reviewed and updated, and may be updated further in 2026.
Rabobank Australia Group	Identification, prevention and mitigation of Modern Slavery risks in our Client portfolio	Increased Employee knowledge of Clients' operations so as to identify the risk of Modern Slavery in their business.	Build on 2024 review of the Human Rights & Modern Slavery related questions in the Planet tool, and enhance Modern Slavery question(s).	Ongoing: In 2025 Rural Client Photo was transitioned to a new sustainability assessment tool which includes additional content on human rights. Additional Modern Slavery questions house in the tool were reviewed. In 2026, knowledge sessions on identification, prevention and mitigation of Modern Slavery risks will be provided on request.
RBUK	Governance Framework	A common, informed understanding of governance expectations, current practices, and proportionality at UK branch level.	NA – new for 2026.	New: UK Compliance began seeking internal views on ways to further develop and enhance RBUK's local Modern Slavery risk approach and will continue this exercise in 2026.
	Risk & Control framework	Establishment of potential local KPI(s).	NA – new for 2026.	New: Explore possible local KPIs to help towards tracking effectiveness of Modern Slavery risk management.
DLL UK	Risk & Control framework	Identifying Modern Slavery risks.	DLL UK to consider adding a new control, focused on adherence to UK Modern Slavery Act requirements.	Ongoing: DLL UK introduced desktop reviews for Suppliers in high-risk sectors for Modern Slavery, and will incorporate these into the Supplier onboarding process in 2026. In addition DLL UK will perform a risk assessment on Modern Slavery risks within DLL UK and AGCO Finance UK activities.
DLL Group	Risk & Control Framework	Enhanced identification and tracking of human rights risks.	NA – new for 2026.	New: In 2026 DLL Group will complete its implementation of the updated HRP. It will also introduce a distinct Modern Slavery category to enhance identification and tracking of potential Modern Slavery related reports, as well as reviewing new categorization options for its Customer Relationship Management system.

# *Appendix F - Mandatory Reporting Criteria under the Australian Modern Slavery Act*

This Statement has been prepared in accordance with the mandatory criteria set out in the Australian Modern Slavery Act 2018 (Cth). The following table references the content in this Statement which complies with Section 16 of the Australian legislation.

Australian Modern Slavery Act 2018 (Cth)	Reference within 2025 Statement
Mandatory Criteria	Appendix E
1. Identify the reporting entity	Section 1, Appendix A
2. Describe the structure, operations and supply chains of the reporting entity	Section 2, Appendix A
3. Describe the risks of Modern Slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Section 3, including 3.1, 3.2, Appendix A
4. Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Section 4.1, Appendix A
5. Describe how the reporting entity assesses the effectiveness of such actions	Section 4.2, Appendix A
6. Describe the process of consultation with any entities that the reporting entity owns or controls	Section 5, Appendix A
7. Include any other information that the reporting entity, or the entity giving the Statement, considers relevant	Appendix A, Appendix E

## Appendix G - Definitions

Term	Definition
<b>Business Client(s)</b>	'Business Client(s)' refers to Clients that are corporations (as opposed to Clients that are natural persons).
<b>Client</b>	'Client' refers to a customer of Rabobank Group inclusive of Business Clients and Retail Clients. In this statement it may be used interchangeably with the term 'Customer'.
<b>Contingent Worker</b>	'Contingent Worker' refers to a person employed by an intermediary or agency, typically hired for temporary assignments. Such Contingent Workers are selected by Rabobank Group and perform their work under Rabobank's supervision. The term Contingent Worker excludes Outsourced Staff as they are considered part of our supply chain.
<b>DLL AUS Suppliers</b>	'DLL AUS Suppliers' has the same meaning as 'DLL Suppliers' but is expanded to include equipment manufacturers and vendors. This is due to DLL Australia's role as a lessor of equipment.
<b>DLL Contractor</b>	'DLL Contractor' in this Statement refers to a person typically employed by an intermediary or agency. Such DLL Contractors are selected by DLL Group. The term DLL Contractor excludes outsourced workers who are covered in the 'DLL Supply chains' section.
<b>DLL Customer</b>	A 'DLL Customer' for the purposes of this Statement is defined as being end-users, vendors, dealers and remarketing Clients.
<b>DLL Employee/ Member</b>	'DLL Employee' in this Statement means fixed term and permanent Employees whose contract is directly with DLL Group. DLL also uses the term Member for a DLL Employee.
<b>DLL Reporter</b>	'DLL Reporter' sometimes called a 'whistleblower', includes: members; persons having the status of 'employees' or 'workers' under a direct employment contract; people in non-standard employment relationships, including part-time/fixed term employees, agency workers, contractors, sub-contractors, self-employed, volunteers, trainees, shareholders, board/supervisory members, suppliers, supporters of the whistleblower, etc.; job applicants, people in the process of recruitment and former employees.
<b>DLL Supplier</b>	'DLL Supplier' in this Statement means a third party who provides goods and/or services to DLL. The term DLL Supplier is not to be confused with vendor partners or relationships as vendors fall under the 'DLL Customer' definition. DLL Supplier includes DLL Contractors and Subcontractors, distributors, lawyers, accountants and consultants, outsourcing service providers, agents, intermediaries, representatives and introducers.
<b>Employees</b>	'Employees' in this Statement refers to fixed-term and permanent Employees whose contract of employment is directly with one of the entities of Rabobank Group. The term Employee excludes Outsourced Staff.
<b>GPW</b>	Global Policy on Whistleblowing
<b>GSP</b>	Global Standard on Procurement
<b>GSSD</b>	Global Standard on Sustainable Development
<b>HRIA</b>	Human Right Impact Assessment
<b>HRP</b>	'HRP' refers to the Human Rights Policy housed within the Rabobank Global Standard on Sustainable Development.
<b>ILO</b>	International Labour Organization.
<b>OECD Guidelines</b>	Organization for Economic Co-operation and Development Guidelines for Multinational Enterprises on Responsible Business Conduct.
<b>Outsourced Staff</b>	Third party staff who deliver a specialist service or fulfil an entire business function, at the initiative of Rabobank. Outsourced Staff is not selected by Rabobank and perform their work under their employer's supervision, not under Rabobank's supervision.
<b>Retail Client(s)</b>	'Retail Client(s)' refers to Clients that are natural persons (as opposed to corporations).
<b>Staff/ Workforce</b>	'Staff' and 'Workforce' in this Statement are used in the general sense to refer to individuals directly employed by or otherwise working for Rabobank Group. Such individuals may also be referred to in this Statement as 'Own Workforce'. The terms include but are not limited to Employees and Contingent Workers. Outsourced Staff are excluded.
<b>Supplier</b>	'Supplier' in this Statement refers to external providers of goods & services including on an outsourcing basis but excluding intragroup activities unless stated otherwise.
<b>UNGPs</b>	United Nations Guiding Principles on Business and Human Rights.