

Cargill Modern Slavery and Human Trafficking Statement

Cargill's purpose is to nourish the world in a [safe, responsible and sustainable](#) way. We aspire to be the most trusted source of products and services across the agricultural, food, industrial and financial markets we serve. We have 155,000 employees in 70 countries who strive to feed the world in a responsible way and improve the communities where we live and work.

Cargill respects internationally recognized human rights throughout our own operations, supply chains and the communities where we do business. We take guidance from international standards and declarations, including the United Nations Guiding Principles on Business and Human Rights (UNGPs), the International Bill of Human Rights and the International Labor Organization Fundamental Principles and Rights at Work. As a signatory company of the United Nations Global Compact, we also are committed to promoting human rights. In accordance with these frameworks, we undertake due diligence and risk assessments, and take action to remedy issues where identified in our workplaces, supply chains and extended communities.

Code of Conduct and Commitment on Human Rights

Since our company was founded in 1865, we have acted on the belief that doing the right thing sets the foundation for long-term success. Cargill's [Code of Conduct](#) outlines our company's ethical and compliance standards for conducting business. Our Code is grounded in our [seven Guiding Principles](#), which serve as the foundation for the behaviours expected from all our employees in all parts of the world.

Cargill's people are our greatest asset. We provide an equitable, safe and supportive workplace. Every employee receives an introduction to the Code of Conduct and Guiding Principles, which is followed by regular training to help ensure that employees' actions align with the company's commitments on business conduct and human rights.

Our [Commitment on Human Rights](#) further frames and articulates Cargill's approach and standards across our diverse business lines. Cargill does not use or tolerate the use of human trafficking, forced labour or child labour. In particular:

- the recruitment, harbouring, transportation, provision, or obtaining of a person for work or services through force, fraud or coercion for the purpose of involuntary servitude or slavery;
- any work or service not of free will, exacted under threat of penalty, including practices such as restricting movement or imprisonment, withholding wages or identity documents to force a worker to stay on the job, or entangling workers in fraudulent debt;
- any work or service by children exposing them to risks that can harm physical, mental or educational development.

Migrant or temporary foreign workers are accorded treatment and protection equal to other workers. We support the UN Sustainable Development Goals' ambitions to promote decent work for all around the world.

Operating responsible supply chains

Supply chains supporting the global food system must be sustainable—balancing the needs of today with the needs of future generations. We can achieve Cargill's purpose only by working closely with our Suppliers. Our [Supplier Code of Conduct](#) explains how we expect farmers, producers, manufacturers, and others to work with us to fulfil that purpose—ethically and in compliance with applicable laws. Our Supplier Code of Conduct extends our seven Guiding Principles into the supply chain, and is translated into nearly thirty languages. We believe this joint commitment to ethical conduct and integrity is a strong foundation for trusted business relationships that create shared value.

Our Supplier Code of Conduct requires Suppliers to know and follow the laws that apply to them and their business. It requires Suppliers to treat legal requirements as a minimum standard, including meeting or exceeding all legal requirements for compensation and working conditions. Cargill also expects our Suppliers to stand with us in prioritising the safety, well-being, and dignity of all individuals whose talents and hard work help us deliver our products and services. Our Supplier Code requires Suppliers to provide safe and healthy working conditions at all their operations, foster an inclusive work environment that is free of harassment and discrimination, and respect employees' rights to organise and bargain collectively. Cargill demands that Suppliers never use or tolerate the use of human trafficking, forced labour, or child labour as defined by the ILO.

We believe it is essential that all parties in the supply chain – industry, government and non-governmental organisations (NGOs) – work together to address these complex problems, support rural communities and ensure children and adults are not subject to these conditions. We are taking actions in our supply chains to prevent and address illegal, abusive or forced work, which include:

- **Cocoa** – as part of our [Cargill Cocoa Promise](#) we are committed to protecting the rights of children, to raise awareness of labour issues and improve working practices through training and education of farmers, their communities and families. We are partnering with government, civil society and other industry

members to protect the rights of children in the cocoa sector. We are actively working towards identifying and intervening in instances of child labour in the cocoa supply chain. By 2025 we will have introduced a monitoring and remediation system in the five countries where we directly source cocoa— Brazil, Cameroon, Côte d'Ivoire, Ghana and Indonesia. In our indirect supply chain, we will carry out due diligence assessments to identify where the risks are located and engage supplier partners to increase their own transparency and build their capacity to address common challenges. Our [Community Wellbeing Strategic Action Plan](#) outlines the concrete steps we are taking to deliver on this commitment with great urgency.

- **Soy** – our commitment to sustainable soy production, laid out in [Cargill's Policy on Sustainable Soy – South America Origins](#), includes being a signatory to the Brazilian National Pact for the Eradication of Slave Labour, which monitors Suppliers. We will not do business with those who appear on the public list of companies and individuals who are found to be profiting from slave labour. To operationalise this, Cargill has an automated system in place that prevents employees from making purchases, sign contracts or receive goods from companies or individuals on this list. Further, [Cargill's South American Soy Action Plan](#) commits to a transparent and sustainable South American soy supply chain that respects and upholds the rights of workers, indigenous peoples and communities. Cargill prohibits the use of human trafficking, illegal, abusive, forced or child labour within our soy operations anywhere in the world, and works with our Suppliers to prevent and address such practices across the supply chain. In cases where exploitative practices are identified, we will determine remedial actions to ensure appropriate and transparent responses. We commit to working with our employees, contractors, Suppliers, independent organisations and governments to uphold an ethical and transparent recruitment process. We prohibit any form of unlawful retention of identity documents.
- **Palm** – Cargill has deployed a global [Policy on Sustainable Palm Oil](#). As Cargill largely operates between growers and consumers, we commit to using this position to take practical measures guided by strict criteria for fair labour rights and human rights. In particular, we commit to a palm supply chain that:
 - Recognises and upholds the rights of workers, indigenous peoples and local communities in line with international human rights principles and local applicable laws, and
 - Upholds high standards of transparency through reporting of traceability, timebound implementation plans, resolving grievances and achieving third party verified policy compliance. Our [palm grievance dashboard](#) is publicly available.

Cargill prohibits the use of human trafficking, illegal, abusive, forced or child labour within our palm operations anywhere in the world, and we work with our Suppliers to prevent and address such practices across the supply chain. In cases where exploitative practices are identified, we determine remedial actions to ensure appropriate, timely and transparent responses. Cargill commits to working with our employees, contractors, Suppliers, independent organisations and governments to uphold an ethical and transparent recruitment process whether

carried out directly or indirectly for our palm business through sub-contractors. We prohibit any form of unlawful retention of identity documents and are taking steps to embed forced labour issues as part of due diligence. As we recognise a number of issues require stakeholder collaboration, we have launched a [study](#) of migrant labour in the palm oil sector in Malaysia with industry peers to assess the risk and seek informed, credible and specific recommendations on how to address them. In addition, we recognise that worker representation is critical to effective monitoring and transparency, and are piloting the use of worker voice systems in our supply chain to improve workers' ability to provide feedback and help Suppliers appropriately manage worker concerns.

- **Cotton** – We are committed to improve sustainability across the [cotton](#) supply chain. We support the work being done by governments and organisations like the Association of Cotton Merchants in Europe and the ILO to find practical solutions to labour issues while fostering responsible economic development. At origin, we support the efforts of assurance organisations Cotton Made in Africa and the Better Cotton Initiative, which work to educate farmers, assess working standards, and ensure against use of forced or child labour per ILO standards.
- **Poultry** – In addition to ensuring we operate in compliance with all legal requirements surrounding employee rights, health and safety, ethical responsibilities and human trafficking, [Cargill's poultry business](#) utilises Sedex auditing. Our facilities' annual SMETAs (Sedex Members Ethical Trade Audits) verify that we operate to a high ethical standard. We also partner with ethical trade nonprofit consultancies to focus improvements on labour conditions in our supply chain.
- **Aquaculture Feed** – Beyond utilising Cargill's Supplier Code of Conduct, our aquaculture feed business in Scotland deploys assessments of all its Suppliers of feed ingredients on the risk of modern slavery and human trafficking. Assessments centre on the country of origin and supply sector. Suppliers identified as working in high-risk countries or sectors are contacted individually and asked to provide more details about how they work to mitigate risk.

Cargill is an active member of Sedex, which promotes improvements in ethical and responsible business practices. We make information about our businesses and facilities available to customers through this widely used and recognised system.

Raising grievances

We take all reports of potential misconduct seriously and handle them promptly, fairly, and as confidentially as possible. We have established a transparent, open, and predictable process for dealing with grievances. Any grievance, complaint or concern from external parties and employees may be submitted anonymously online or by phone via Cargill's secure [Ethics Open Line](#), which is operated by an independent third-party and is available 24 hours a day, 7 days a week. Employees can also raise grievances with their manager, human resources representative, and/or through their trade union or employee representative. Cargill will not tolerate retaliation against anyone who, in good faith, raises a concern or participates in an investigation.

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Cargill group's slavery and human trafficking statement for the financial year ending 31st May 2022.

A handwritten signature in black ink, appearing to be 'PK', is centered within a light gray rectangular box.

Paul Kingston
Chairman of the Board of Directors
Cargill PLC
22 November 2022