

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 more than 160,000 employees in 70 countries who strive to feed the world in a responsible way and improve the communities where we live and work.

Human rights are fundamental at Cargill and our actions are driven by our values and our culture of putting people first, championing action and embracing our responsibility to protect people and planet. We are committed to respecting the human rights of all Cargill employees and all those whose lives and livelihoods we touch. Cargill complies with local laws and 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 Labour 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.

Code of Conduct and Human Rights Policy

Cargill has a strong set of values: put people first, do the right thing and reach higher. Cargill's [Code of Conduct](#) outlines our company's ethical and compliance standards for conducting business throughout the world and serves as a guide for employees in conducting their daily work. Our Code is grounded in [seven Guiding Principles](#) that are ingrained in our culture and serve as the foundation for the behaviours expected from all employees.

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 [Human Rights Policy](#) outlines our commitment to human rights within our operations and supply chains, and it applies to Cargill Incorporated and its subsidiaries. We also expect our suppliers and business partners to uphold these principles and urge them to adopt similar policies within their own businesses.

Cargill does not tolerate the use of any form of forced labour – including prison labour, indentured labour, bonded labour, and any forms of modern slavery or trafficking – anywhere in our own operations and supply chains.

Cargill's Human Rights Policy and other policies, which outlines Cargill's commitment to operating sustainable supply chains, respecting and supporting communities, and promoting an equitable, safe, and supportive workplace, can be found here:

<https://www.cargill.com/sustainability/reporting-hub>

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 International Labour Organization (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 actively working towards eradicating child

labour in the cocoa supply chain. To address the root causes of child labour, we are combining CLMRS (Child Labour Monitoring & Remediation System) with preventative measures such as community development, women's empowerment, and opportunities for youth.

- **Soy** – our commitment to sustainable soy production, laid out in [Cargill's Policy on Sustainable Soy – South America Origins](#), includes creating transparency in our supply chain while also enabling our farmer partners to mature in their social sustainability journey. Our 4-step due diligence process ensures that we are accurately polygon-mapping our suppliers and acting on non-conformances once issues are identified. 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.
- **Palm** – Cargill has a global [Policy on Sustainable Palm Oil](#) through which we monitor our supplier's compliance against our own guidelines and industry-wide frameworks. As Cargill largely operates between growers and consumers, we commit to using this position to influence organizations both up and down our value chains to engage in 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. To address labor and human rights issues in the palm oil supply chain, we prioritize engagement based on varying levels of severity and impact to drive long-term capability and compliance improvements. When a supplier is unable or unwilling to make progress within the agreed upon timeframe, or has repeated non-compliances, we remove the supplier from our supply chain.
- **Cotton** – We are committed to improve responsible sourcing and sustainability across the [cotton](#) supply chain. We also 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 like 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. As part of our human rights due diligence process we continue to assess human rights risks at high-risk sourcing countries and engage with suppliers and rightsholders to build capabilities and mitigate risks accordingly.
- **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 use annual SMETAs (Sedex Members Ethical Trade Audits) or equivalent audits to 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 global aquaculture feed business developed a distinct Sourcing Policy that carries specific reference to ILO International Labour Standards. Through these normative documents, we conduct assessments of our aquaculture feed ingredient supply chains on the risk of modern slavery and human trafficking. Assessments centre on the country of origin and supply sector, and 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. For our production operations in the UK – a feed mill in Westfield, Scotland – and with respect to the UK Modern Slavery Act, this includes risk assessments of all suppliers. In addition, we will also pursue Aquaculture Stewardship Council (ASC) certification for feed mills, which requires risk assessments and due diligence processes on working conditions and human rights along the OECD principles, and have initiated intensive human rights assessments on more than ten key supply chains with two specialist third-party organisations.

More information on the actions we are taking in our supply chains can be found in Cargill’s [ESG report](#).

Human Rights Due Diligence

Foundational to our strategy is a risk management process to proactively identify and manage human rights impacts. We are continuously enhancing our human rights due diligence program to identify, prevent, mitigate and account for human rights impacts in our operations and supply chains. We take guidance from the UN Guiding Principles on Business and Human Rights and the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Business Enterprises.

In certain countries and supply chains where we operate, there are particularly high, systemic risks of adverse human rights impacts. This means that we need to put in place heightened human rights due diligence to assess these risks and remediate, where appropriate.

Raising grievances

In line with the UN Guiding Principles on Business and Human Rights, where we have caused or contributed to adverse impacts on people, we are committed to providing or contributing to remedy, including through our existing grievance channels – for instance our [Soy Grievance Process](#) and [Palm Grievance Process](#). We continue to increase awareness of our grievance channels among workers and community members, including in our supply chains. Individuals can raise any concerns anonymously about the conduct of a Cargill employee or business through the [Cargill’s Ethics Open Line](#) which is available 24 hours a day, 7 days a week for employees and third parties anywhere in the world (subject to certain countries’ legal

limitations). This channel is managed by a third-party to secure confidentiality and protection from retaliation.

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 2023.

Paul Kingston

Paul Kingston
Chairman of the Board of Directors
Cargill PLC

24 November 2023