

# Cargill's Human Rights Policy

## Introduction

Cargill connects farmers with markets, customers with ingredients, and families with daily essentials – working across industries.

Cargill is in a unique position to impact multiple supply chains globally. From the sourcing and production of raw materials like soy, palm and cocoa, to the shipping and transportation of traded goods, Cargill has the ability to influence and work with stakeholders across the diverse value chains in which we operate.

With our global reach and geographical footprint comes the responsibility to understand and manage how we impact the human rights of those in our businesses and supply chains. We know our ability to grow as a company depends on the way we treat people, how we empower our communities, and how well we serve our customers.

### **Purpose and Scope**

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's Commitment to Respect Human Rights

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 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.

## How we meet this Commitment

### **Governance**

Cargill's Chief Sustainability Officer (CSO) reports directly to our Board Chair and Chief Executive Officer and oversees the implementation of company policies and programs to deliver against Cargill's global sustainability commitments, including human rights. A Global Vice President for Social Sustainability and a Global Human Rights Lead reporting through the CSO are responsible for delivering the human rights strategy and orchestrating its implementation through a diverse, cross-functional team. The implementation of Cargill's Human Rights Policy is overseen by a subset of members of Cargill's Executive Team, including our Chief Human Resources Officer, General Counsel & Chief Compliance Officer, Business Operations and Supply Chain Chief Transformation Officer and Chief Sustainability Officer.

### **Policy Framework**

Our Human Rights Policy framework consists of this Human Rights Policy and the other policies, codes, and programs described below. Together, this collective guidance helps us meet our human rights commitments and embed human rights practices in our own operations and supply chains.

### **Cargill Code of Conduct**

Cargill has a strong set of values: do the right thing, put people first 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 behaviors expected from all employees.

## **Supplier Code of Conduct**

Our [Supplier Code of Conduct](#) enlists our supplier partners in upholding these same Guiding Principles. We believe this joint commitment to ethical conduct and integrity is a strong foundation for trusted business relationships that create shared value.

## **Supply Chain Specific Policies**

Cargill has several supply chain specific policies and commitments, including the following:

- **Cocoa:** the [Cargill Cocoa Promise](#) sets out our approach to protecting the rights of children, raising awareness of labor issues and improving working practices through training and education of cocoa farmers, their communities and families.
- **Palm:** Cargill's [Policy on Sustainable Palm Oil](#) sets out our commitment to recognize and uphold the rights of workers, indigenous peoples and local communities in the palm supply chain.
- **Soy:** Cargill's [Policy on Sustainable Soy – South America Origins](#) sets out our commitment to sustainable soy production and to a transparent and sustainable South American soy supply chain that respects and upholds the rights of workers, indigenous peoples and communities. Cargill's [South American Soy Action Plan](#) describes the pathway to achieve these commitments.

## **Salient Human Rights Issues**

Cargill's salient human rights issues are at the core of our human rights strategy and were determined – in alignment with the UNGPs – through human rights assessments, internal and external consultations, and engagement in multi-stakeholder collaborative forums and were validated by external advisors.

We prioritize our actions in the areas with greatest risk to people in our operations and supply chains and seek to identify and address negative impacts where they occur and remediate those we have caused or to which we have contributed. We also seek to focus on areas where we can have the greatest positive impact, using our influence to affect change.

Cargill's salient human rights issues are:

1. Health and safety
2. Worker Voice
3. Fair wages and working hours
4. Forced labor
5. Child labor
6. Land rights

Advancing equity and women's empowerment is central to addressing the root causes of our salient human rights issues and we will use this as a cross-cutting lens as we implement our work. We strive to ensure fair treatment and access to opportunity, while contributing to broad societal change by empowering women and promoting equity for all.

This is not intended to be an exhaustive list of all human rights issues that exist across our businesses, and we will continue to address and update this list, as needed. Cargill will assess its human rights issues by implementing periodic risk-based human rights assessments.

## **Health and Safety**

We are committed to a culture in which we put our people first, and all our business activities are conducted in a manner that protects the health and safety of those whose lives we touch. While safety is a journey and one that calls for continuous focus and dedication, we live up to this commitment by systematically building on our foundational programs that are designed to protect our people and ensure a safe, healthy workplace for all.

## **Worker Voice**

### *Freedom of association*

Cargill respects the right of workers to form or join a legally recognized labor organization, if they choose, without fear of reprisal, intimidation or harassment. We are committed to constructive dialogue with our employees and / or their freely chosen representatives.

### *Anti-harassment / Anti-violence*

All workers must be treated with dignity and respect and feel physically, emotionally and psychologically safe. Cargill does not tolerate harassment or violence in any form. We will act promptly to investigate all allegations in accordance with applicable laws and our policies.

### *Non discrimination*

Cargill is committed to creating and sustaining a diverse, equitable and inclusive work environment where all workers are treated with dignity and respect. Cargill prohibits discrimination against any worker or applicant based on race, ethnicity, color, religion, national origin, ancestry, sex, gender, gender identity, gender expression, sexual orientation, age, disability, pregnancy, genetic information, marital status, family status, citizenship status, veteran status, military status, union affiliation, political affiliation and/or any other status protected by law. Cargill stands firm against any form of discrimination and remains committed to equal opportunities for all.

## **Fair Wages and Working Hours**

### *Fair Wages*

Cargill is committed to providing competitive, fair and equitable pay. We comply with local laws and will go beyond them as needed to stand behind our commitment to put people first and to nourish the world in a safe, responsible and sustainable way.

### *Working hours*

We are committed to improving workers' well-being through a safe and healthy working environment which includes the adherence to applicable working hours laws, including overtime. When no legal limit exists or the legal limit is at a level that would be to the detriment of workers' safety, health and well-being, we will appropriately manage the number of hours worked and days of rest each week.

## **Forced Labor**

Cargill does not tolerate the use of any form of forced labor – including prison labor, indentured labor, bonded labor, and any forms of modern slavery or trafficking – anywhere in our own operations and supply chains. We will act to eliminate any form of forced labor from our own operations and supply chains through the following actions:

- **Recruiting responsibly:** Workers should not pay recruitment or similar fees to obtain employment. The costs of recruitment should be borne by the employer.
- **Respecting the terms and conditions of employment with transparency:** Terms and conditions of employment should be communicated to workers in a language they understand, and changes should be communicated transparently. Workers should be free to terminate employment upon reasonable notice, and migrant or temporary foreign workers must be accorded treatment and protection equal to other workers.
- **Allowing workers to have freedom of movement:** Workers should have the ability to move freely and should not be restricted by their employer through abuse, physical force, or threats of violence or reprisals. Workers should retain control over their personal identification documents and other valuable possessions.

## **Child Labor**

At Cargill we work to eradicate child labor from our operations and supply chains. We implement appropriately designed due diligence systems that are intended to identify, prevent and remediate child labor. We will not hire individuals under the legal working age or the mandatory age of schooling (whichever is lower). Cargill workers under the age of 18 will not be assigned work that is mentally, physically, or socially dangerous or that deprives them of the opportunity to attend school. In our supply chains, we reduce the vulnerability of children to child labor by supporting farming families and producers through prevention efforts such as enhancing income generation, access to education

and employment. Our integrated approach combines prevention with a supply-chain based monitoring system and is supported by a network of community development activities to address critical needs.

### **Land Rights**

We are committed to respect land resources and tenure rights for everyone, especially for indigenous people, local communities and ethnic or minority groups, and observe the principle of free, prior and informed consent as a core element to protect those rights. We also respect the rights and freedoms of human rights and environmental defenders, recognizing the crucial role they play in protecting land tenure rights, promoting human rights and environmental sustainability. Cargill supports the Food and Agriculture Organization (FAO) Voluntary Guidelines on Responsible Tenure of Land, Fisheries and Forests, which help ensure that land tenure rights of local people are protected.

### **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.

### **Remediation and Grievance Mechanisms**

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.