

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 is committed to treating people with dignity and respect in the workplace and in the communities where we do business. We promote and respect human rights as outlined in the Universal Declaration of Human Rights and the UN Sustainable Development Goals. We are a participant in the UN Global Compact. We take guidance from the UN Guiding Principles on Business and Human Rights and the International Labour Organisation (ILO) Fundamental Principles and Rights at Work. These frameworks call on us to engage in due diligence 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 throughout the world. Our Code is grounded in our seven Guiding Principles, which are ingrained in our culture and serve as the foundation for the behaviors 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 labor or child labor. In particular:

- the recruitment, harboring, 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 fulfill that purpose—ethically and in compliance with applicable laws. Our Supplier Code of Conduct extends our 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 prioritizing 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 of their operations, foster an inclusive work environment that is free of harassment and discrimination, and respect employees’ rights to organize and bargain collectively. Cargill demands that Suppliers never use or tolerate the use of human trafficking, forced labor, or child labor as defined by the ILO.

We believe it is essential that all parties in the supply chain – industry, government and non-governmental organizations (NGOs) – work together to address this complex problem and support rural prosperity 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 working to protect the rights of children, to raise awareness of labor issues and improve working practices through training and education for farmers and their communities and families. We are working hand in hand with government, civil society, and other industry members to protect the rights of children in the cocoa sector. We are committed to eradicating child labor in our cocoa supply chain and have developed a strategic action plan to deliver and demonstrate this by 2025. To that end, we have implemented a range of activities within our cocoa supply chain to identify and protect children at risk. We tackle root causes such as poverty in cocoa-growing communities, lack of awareness and education, and insufficient economic opportunities. By designing and deploying programs that help improve the livelihoods of cocoa farmers and their communities, we are taking a coordinated, multi-sectoral approach to addressing this complex issue. More detailed information about our efforts and commitment to sustainable and responsible cocoa is available on our website at <https://www.cargill.com/sustainability/cocoa/protecting-children>.
- **Soy** – our commitment to responsible soy production includes being a signatory to the Brazilian National Pact for the Eradication of Slave Labor, which monitors suppliers. We will not do business with those who appear on this list. Further, Cargill’s Policy on Sustainable Soy – South America Origins 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 labor within our soy operations anywhere in the world, and work 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 organizations 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 sits between growers and consumers, we commit to using this position to take practical measures to promote responsible supply chains that respect people and human rights. We are working towards a 100% transparent, traceable and sustainable palm supply chain by 2020, including strict criteria for fair labor rights and human rights. In particular, we commit to a palm supply chain that:
 - Recognizes 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 labor within our palm operations anywhere in the world, and 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 organizations 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.

As a member of the Round Table on Sustainable Oil (RSPO), our palm plantations are RSPO certified and we offer RSPO certified palm oil products to our customers. In line with RSPO standards, we will conduct a living wage assessment, initially in our palm plantation operations, based on credible methodologies with the goal of ensuring workers have access to decent living wages.

- **Cotton** – We are committed to supporting the work being done by governments and organizations like the Association of Cotton Merchants in Europe and the ILO to find practical solutions to labor issues while fostering responsible economic development. At origin, we support the efforts of certifying organizations 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 labor 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 utilizes 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 utilizing Cargill’s Supplier Code of Conduct, our aquaculture business deploys risk assessments of its suppliers focusing on the risk of modern slavery and trafficking of persons. Assessments center on country of origin and supply sector. Suppliers identified as working in high risk areas are contacted individually and asked to provide more details about how they work to mitigate risk. We also use supplier due diligence programs and are working to install compliance verifications to help ensure against forced labour and the ILO worst forms of child labour in our supply chains.

Throughout the company, 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 2019.



Paul Kingston
Chairman of the Board of Directors
Cargill PLC

17th June 2019