

## US corporate human rights index: Tracking changes in company commitments to human rights

Findings as of July 2025 Cargill

Indicator	Findings	Source	Source Link
Policies and commitments			
<u>General</u>			
Human rights policy - UNGPs	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.	Human Rights Policy, pg 1, updated Jan 2024	https://www.cargill.com/doc/143213652 9974/cargill-commitment-on-human- rights.pdf
Human rights policy - ILO Core Labor Standards	See above		
Forced labor & prison labor	Cargill does not tolerate the use of any form of forced labor – including all prison labor, indentured labor, bonded labor, and any forms of modern slavery or trafficking – anywhere in our own operations and supply chains.	Human Rights Policy, pg 3, updated Jan 2024	https://www.cargill.com/doc/143213652 9974/cargill-commitment-on-human- rights.pdf
Human rights defenders & civic space	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.	Human Rights Policy, pg 3, updated Jan 2024	https://www.cargill.com/doc/143213652 9974/cargill-commitment-on-human- rights.pdf
Gender equality and women's empowerment	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.	Human Rights Policy, pg 2, updated Jan 2024	https://www.cargill.com/doc/143213652 9974/cargill-commitment-on-human- rights.pdf

Indigenous Peoples	Palm: Cargill commits to a transparent, traceable and sustainable palm oil supply chain that [] Respects and upholds the rights of workers, indigenous peoples and local communities.  Soy: Cargill commits to a transparent and sustainable South American soy supply chain that: Respects and upholds the rights of workers, indigenous peoples and communities.	Cargill Policy on Sustainable Palm Oil Cargill Policy on Sustainable Soy South American Origins	https://www.cargill.com/doc/143207614 9492/palm-oil-policy-statement-pdf.pdf
Natural resources			
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	Human Rights Policy, pg 3, updated Jan 2024	https://www.cargill.com/doc/143213652 9974/cargill-commitment-on-human- rights.pdf
Free, Prior, and Informed Consent (FPIC)	See Land Rights		
<u>Living wage</u>			
Living wage, own operations	Cargill is committed to providing competitive, fair and equitable pay, which includes a living wage that supports our employees and their families. 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.	Human Rights Policy, pg 3	https://www.cargill.com/doc/143213652 9974/cargill-commitment-on-human- rights.pdf
Living wage in supply chain	No evidence		
Human rights due diligence and supply chain			
Process for assessing human rights risks and impacts	Step 1. Identify and Assess: We identify potential and actual adverse impacts by first gathering information and assessing specific country, commodity, and industry related risks. For identified higher risks, we conduct a human rights assessment and/or environmental assessment. We then prioritize the risks within our own operations, supply chains, and business relationships.	Human Rights and Environmental Due Diligence Policy [2023]	https://www.cargill.com/doc/143225248 4948/corporate-due-diligence-policy.pdf
Heightened human rights due diligence in Conflict Affected and High Risk Areas (CAHRAs)	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.	Website - Cargill's Human Rights Policy	https://www.cargill.com/page/cargill-human-rights-policy#:~:text=Foundational%20to%20our%20strategy%20is,Guidelines%20for%20Multinational%20Business%20Enterprises.

Affected stakeholder engagement	Palm & soy: We will enact changes in our direct supply chain while working in close collaboration with critical stakeholders, including our direct and indirect suppliers, customers, communities, governments, non-governmental organizations, academia and others to achieve our commitments.	Cargill Policy on Sustainable Palm Oil Cargill Policy on Sustainable Soy - South America Origins	https://www.cargill.com/doc/143207614 9492/palm-oil-policy-statement-pdf.pdf https://www.cargill.com/doc/143213654 4508/cargill-policy-on-south-american- soy.pdf
Human rights requirements in supplier code/requirements	We expect our Supplier Partners to uphold the principles and due diligence obligations outlined in Cargill's Human Rights Policy and to prioritize the safety, well-being, human rights, and dignity of all individuals whose talents and hard work help us deliver our products and services.	Supplier Code of Conduct, pg 5	https://www.cargill.com/doc/143210107 8794/supplier-code-of-conduct- pdf_en.pdf
Access to remedy			
Grievance mechanism for own employees	Cargill commits to working with parties to resolve complaints and conflicts in its own operations and supply chain through an open, accessible, transparent and consultative process. Under our grievance framework, when internal or external stakeholders raise concerns about sustainability, human rights, or environmental practices (relating to Cargill or our suppliers or business partners), we will deploy a holistic grievance approach to address those concerns in a timely, transparent, equitable and participatory manner Grievances will be managed through Cargill's Ethics Open Line system. Please note that grievances related to Cargill plantations may be addressed through a local, culturally appropriate grievance procedure, unless a community or their representative has opted to follow this mechanism.	Cargill's Human Rights and Environmental Grievance Process	https://www.cargill.com/doc/143225259 6829/grievance-process-en.pdf
Grievane mechanism for workers - supply chain	See Greivance mechanism for own employees		
Grievance mechanism for external individuals &	See Greivance mechanism for own employees		
Governance and staffing			
Board and/or C-Suite-level oversight	Cargill's Chief Sustainability Officer (CSO) reports directly to the Chief Executive Officer and oversees the implementation of company policies and programs to deliver against Cargill's global sustainability commitments, including human rights 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.	Cargill Human Rights Policy, pg 1	https://www.cargill.com/doc/143213652 9974/cargill-commitment-on-human- rights.pdf

Control tever responsibility for multian rights	Rights Lead and a Global Responsible Sourcing Lead reporting through the CSO are responsible for delivering the human rights and responsible sourcing strategies, and orchestrating its implementation through a diverse, cross-functional team	Odigiii Fidinari Agrico Folicy, pg	9974/cargill-commitment-on-human- rights.pdf
Reporting & transparency			
Human rights reporting (integrated or stand-alone)	2024 Impact Report includes human rights	Impact Report 2024	https://www.cargill.com/sustainability/do c/1432270798723/2024-impact- report.pdf
Memberships			
RBA	No evidence	RBA	https://www.responsiblebusiness.org/about/members/
RSPO	Yes	RSPO	https://rspo.org/search-members/
WEPs (signatory)	Yes	WEPs	https://www.weps.org/companies
Lobbying and ethics			
Public statement or endorsement in support of mandatory human rights and environmental due diligence	Cargill welcomes the proposed policies. We believe that greater transparency supported by a broad enabling environment in producing countries will accelerate the efforts to date by companies and drive positive transformation for the cocoa sector. And yet we also want to make sure that the full set of social and environmental risks are taken into account to avoid unintended consequences. We believe that engagement and dialogue between the EU and producing country governments will be crucial and that broad capacity-building on the ground will be required.	Website - How Cargill can help you understand the impact of new EU regulations on your business	https://www.cargill.com/story/cargill-can- help-understand-impact-new-eu- regulations#

Cargill Human Rights Policy, pg 1

Code of Conduct, pg 11

https://www.cargill.com/doc/143213652

https://www.cargill.com/doc/143207640 3017/guiding-principles-en.pdf

A Global Vice President for Social Sustainability, a Global Human

We never offer, accept or receive bribes, kickbacks or other corrupt

payments to or from others, including government officials. We ensure that we understand and strictly follow all applicable antibribery and anti corruption laws, including when we Interact with

government officials.

//END//

Anti-bribery and anti-corruption policy

Senior level responsibility for human rights