

Supplier Code of Conduct

Our commitment to helping the world thrive

Cargill's purpose is to nourish the world in a safe, responsible, and sustainable way. We understand that supply chains supporting the global food system must be sustainable – balancing the needs of today with the needs of future generations. We can achieve our purpose only by working closely with our suppliers.

Our Supplier Code of Conduct explains how we expect suppliers, farmers, producers, manufacturers, and other business partners (each a "Supplier Partner") to work with us to fulfill that purpose – ethically and in compliance with applicable laws. When selecting our Supplier Partners and extending an existing business relationship, we consider the expectations imposed by this Supplier Code of Conduct.



Our Guiding Principles

Cargill's seven Guiding Principles apply to all our employees; they provide the foundation for our operations globally. Our Supplier Code of Conduct enlists our Supplier Partners in upholding these same principles. We believe this joint commitment to ethical conduct and integrity is a strong foundation for trusted business relationships that create shared value. This Supplier Code of Conduct is incorporated, by reference, into all supplier contracts.

1. Obey the law

As a responsible company, we expect our global Supplier Partners to share our commitment to following the law.

We expect our Supplier Partners to:

- Know and follow the laws that apply to them and their business.
- Treat legal requirements as a minimum standard.
- Alert Cargill to any material issues with the goods and services they supply – especially health and safety issues. This helps Cargill comply with global regulations.

2. Conduct business with integrity

We seek business relationships based on trust, transparency, and mutual accountability.

We expect our Supplier Partners to:

- Compete fairly and ethically for Cargill's business.
- Never offer or accept bribes, kickbacks, inappropriate gifts or hospitality, or other improper incentives in connection with Cargill's business.

- Avoid any conflict of interest relating to financial interests or other arrangements with our employees that may be considered inappropriate.
- Work with their own suppliers to promote business conduct consistent with the principles in this Supplier Code of Conduct and in compliance with applicable laws.

3. Keep accurate and honest records

We expect our Supplier Partners to maintain accurate and honest records. This helps us make responsible business decisions and disclose truthful and timely information to our stakeholders.

We expect our Supplier Partners to:

- Maintain books and records that reflect all transactions in an accurate, honest, and timely way.
- Employ appropriate quality audit and compliance processes for matters such as product, food, and feed safety, worker health and safety, and labor and employment.
- Disclose, on request, the location of facilities and known origins of materials to enable traceability.

4. Honor business obligations

We work with Supplier Partners who share our desire to build productive business relationships. This requires honest communications, mutual respect, and delivering on commitments.

We expect our Supplier Partners to:

- Share our commitment to conducting business honestly and transparently.
- Honor business obligations and manage unanticipated events in a proactive, timely, and open way.

5. Treat people with dignity and respect

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.

We expect our Supplier Partners to:

- Conduct their business activities in a manner that protects the health and safety of those whose lives they touch.
- Respect the right of workers to form or join a legally recognized labor organization, if they choose, without fear of reprisal, intimidation, or harassment.
- Treat all workers with dignity and respect, and provide an emotionally and psychologically safe and inclusive working environment.
- Provide competitive, fair, and equitable pay.
- Comply with applicable working hours laws, including overtime hours.
- Act to eliminate any form of forced labor – and work to eradicate child labor – from their operations and supply chains.
- Respect land resources and tenure rights for everyone, especially for indigenous people, local communities, and ethnic or minority groups.

6. Protect Cargill's information, assets, and interests

We expect our Supplier Partners to protect Cargill's reputation and any information or property we entrust to them.

We expect our Supplier Partners to:

- Protect any of Cargill's confidential information to which they have access, including its intellectual property, trade secrets, or financial information.
- Safeguard any property belonging to Cargill while under their control.
- Avoid any situations that may adversely affect our business interests or reputation, and maintain strict standards to promote product, food, and feed safety.

7. Be a responsible global citizen

We count on our Supplier Partners to help Cargill meet our strategic sustainability commitments and comply with [Cargill's Corporate Due Diligence Policy](#).

We expect our Supplier Partners to:

- Reduce the environmental impact of their business through efforts such as eliminating deforestation, reducing greenhouse gas emissions and waste, and using resources efficiently.
- Protect water resources by minimizing use of water in their operations, avoiding contamination from their operations, and reducing the impact on the water resources of the surrounding communities.
- Commit to addressing and mitigating the impacts of their business on climate, land, water, soil, air, and biodiversity.
- Take guidance from international standards, conventions, and declarations, including the United Nations Guiding Principles on Business and Human Rights (UNGPs), the International Bill of Human Rights, the International Labor Organization Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises.
- Provide their stakeholders access to grievance mechanisms for raising concerns confidentially without fear of retaliation.
- Upon request, provide evidence of their compliance with the requirements of our Supplier Code of Conduct.



Compliance with this Supplier Code of Conduct: Investigations and Corrective Actions

It is our goal to build trust-based relationships with ethical suppliers and business partners who comply with this Supplier Code of Conduct. In furtherance of this goal, we take a risk-based approach to training our Supplier Partners and requiring evidence of compliance with the requirements of this Supplier Code of Conduct. We expect our Supplier Partners to fully cooperate with our reasonable requests for data, information, certifications, and audit access to verify compliance, and to obtain assurances that their own business partners and producers uphold these principles.

When there is a concern, or we become aware of facts that indicate a Supplier Partner has breached this Supplier Code of Conduct, our practice is to investigate these incidents and work with the Supplier Partner to develop an action plan to address the concern. However, during an investigation, we reserve the right to suspend all contractual and business operations with the Supplier Partner. If we determine that an issue cannot be corrected, or a Supplier Partner is unwilling to engage or reasonably cooperate, we further reserve the right to terminate our agreement(s) with that Supplier Partner.

This Supplier Code of Conduct sets forth the minimum requirements that must be met to be a Cargill Supplier Partner. We encourage our Supplier Partners to have due diligence and management systems in place to maintain these minimum requirements. By working closely with our Supplier Partners, we believe we can achieve mutual success while helping communities and the wider world thrive. This Supplier Code of Conduct, as updated and made publicly available at <https://www.cargill.com/about/supplier-code-of-conduct>, replaces all previous versions of the Cargill Supplier Code of Conduct.

Raising Concerns: Grievance Process

If you see or suspect any conduct or business practices that you think could violate our Supplier Code of Conduct, please contact Cargill directly. You may raise a concern or get help by:

- Contacting your Cargill representative; or
- Contacting our secure Cargill Ethics Open Line. Concerns may be raised via phone or by filing an online report. Contact details and further information in over 20 languages may be found at <https://www.cargill.com/about/ethics-open-line>.

Getting in touch with us quickly helps to prevent problems and correct any that have already occurred. We handle all reports promptly, fairly, and as confidentially as possible.