

SCOPE

This policy applies to all employees, consultants, representatives, officers, and directors acting on behalf of Cargill, Incorporated and its subsidiaries and affiliates. It should be read in conjunction with Cargill's Code of Conduct.

PURPOSE

Our Human Rights and Environmental Due Diligence process has been designed to specifically address risks associated with human rights and environmental impacts within our own operations, supply chains, and business relationships.

We integrate a variety of tools to assist us in our due diligence, which may include the use of satellite imagery, partnerships with our supplier partners to conduct on-site visits, certifications, grievances reported via our [Ethics Open Line](#), and information from third party sources – including governmental authorities, international nongovernmental organizations (NGOs), and consulting experts.

We take a risk-based approach to our due diligence investigations, and we require all suppliers to comply with our [Supplier Code of Conduct](#). We are continuously enhancing our due diligence procedures to identify, prevent, mitigate, and/or remediate adverse human rights and environmental impacts.

POLICY REQUIREMENTS

Foundational to our due diligence strategy is a risk management process to proactively identify and manage adverse human rights and environmental impacts. Cargill takes guidance from the UN Guiding Principles on Business and Human Rights, the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, the OECD-FAO Guidance for Responsible Agricultural Supply Chains, and the OECD-FAO Business Handbook on Deforestation and Due Diligence in Agricultural Supply Chains.

In certain countries and supply chains where we operate, there are particularly high, systemic risks of adverse human rights and environmental impacts. Our four-step process helps us to identify and address adverse impacts where they occur, and to mitigate or remediate those we have caused or contributed to in some way.

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.

Step 2. Act: When adverse human rights or environmental impacts are identified following an assessment, we implement time-bound action plans to prevent, mitigate, and/or remediate those risks.

Step 3. Track: Following the implementation of an action plan, we measure the results to track specific human rights and environmental impacts.

Step 4. Report: We communicate the impact and results of the action plans via internal and/or external reports.

RELATED PROCEDURES

ADDITIONAL REFERENCES

[Human Rights Policy](#)

POLICY OWNER / VERSION

Christi Koppes, Responsible Sourcing

Last Update Date: December 2023