



Ethics and Compliance

Cargill is committed to doing business in an ethical manner. Our customers, shareholders, employees, and communities count on us to uphold this commitment, and we know that Cargill's continued success depends on it.

Our approach

Since we were founded in 1865, Cargill has acted on the belief that doing the right thing sets the foundation for long-term success.

We work to foster a culture of respect and cooperation, focusing on shared ethical standards and strong compliance programs that enable our customers to succeed and our communities to thrive.

Our ethical culture

Our shared ethical standards along with our corporate values – do the right thing, put people first, and reach higher – shape our decisions and behaviors at all levels of the organization.

Guiding Principles

Cargill's seven **Guiding Principles** are ingrained in our culture and serve as the foundation for the behaviors expected from all our employees around the globe:

1. We obey the law.
2. We conduct our business with integrity.
3. We keep accurate and honest records.
4. We honor our business obligations.
5. We treat people with dignity and respect.
6. We protect Cargill's information, assets, and interests.
7. We are committed to being a responsible global citizen.

Code of Conduct

Our **Code of Conduct** is grounded in our Guiding Principles and outlines the shared ethical standards and critical compliance policies that apply to all employees worldwide.

The Code of Conduct is shared with new employees during onboarding and reinforced through annual training, and it has been translated into 24 languages for our global colleagues. Every employee must comply with and report known or suspected violations of the Code of Conduct and Cargill's compliance policies. Employees have many options for reporting ethics and compliance concerns. Managers set the tone for their teams and are often the first place employees turn. In addition, employees can reach out to the company's Ethics and Compliance Office or their Human Resources representative. Employees and external parties can also contact our confidential helpline, the **Ethics Open Line**, which is available 24 hours a day, seven days a week for employees, contractors, and external stakeholders anywhere in the world.

Cargill does not tolerate retaliation against anyone who reports concerns or violations in good faith or participates in an investigation. Any employee who does not comply with our Code of Conduct, fails to report violations, or participates in retaliation against someone who reported suspected misconduct may face disciplinary action, up to and including termination.

Celebrating our commitment

In February 2023, we celebrated our third global Ethics Week. This year's theme focused on respecting others. Throughout Ethics Week, employees worldwide shared what respect means to them and we experienced tremendous employee engagement. Participants spanning 37 countries shared photos, videos, quotes, and more, underscoring our collective commitment to fostering an ethical culture and creating a respectful workplace for everyone, every day.

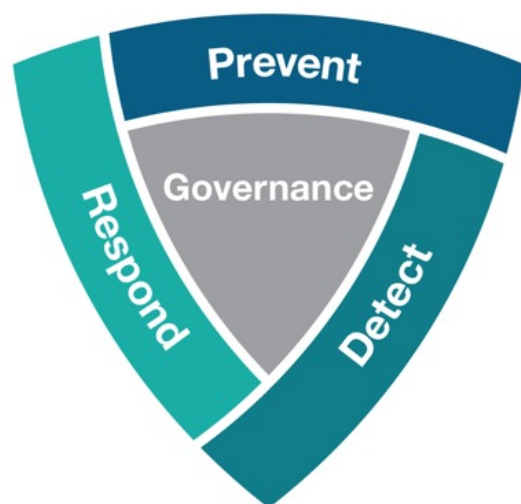
Supplier Code of Conduct

Given the role our suppliers play in our business, ethics and compliance are also critically important within our supply chain. That's why we established Cargill's **Supplier Code of Conduct**, which complements our Code of Conduct for employees and is grounded in the same seven Guiding Principles. This reflects our belief that a shared commitment to ethical conduct and integrity is the foundation of trusted business relationships that create shared value.

We work very closely with our supplier partners, and we routinely request information, certifications, and/or audit access from them. Through our Continuous Risk Management Process, we work on a regular basis with our supplier base on managing ESG risks and improving our overall responsible sourcing framework. When a concern is raised, we work to identify possible improvements. However, when an issue cannot be corrected or a supplier partner is unwilling to engage, we reserve the right to end our business relationship. Like our employees, suppliers have access to our confidential, third-party hotline, **Ethics Open Line**, for reporting ethics and compliance concerns.

Promoting risk management and compliance

As an organization privileged to do business all over the world, Cargill is constantly looking at our environment to understand our risks and comply with the laws that are applicable to our businesses.



Risk management

Assessing and managing compliance risks is a shared responsibility – from the Audit Committee of Cargill’s Board of Directors to our businesses and functions.

Cargill prevents risks through policies, procedures, controls, communications, training, and due diligence; detects ethics and compliance risks through monitoring and auditing; and responds to concerns of misconduct through internal reporting, investigations, and enforcement.

Compliance programs and governance

Our Ethics and Compliance Office connects business groups and functions across Cargill to deliver effective and efficient global programs. Below are highlights of three of those programs.

- Cargill is committed to avoiding corruption in all forms and promotes awareness about anti-corruption laws through communication and training. Our Anti-Bribery program focuses on Cargill’s most important risks including vendor due diligence, oversight of government donations, and gift and entertainment monitoring. Anti-bribery due diligence has also been embedded in our vendor onboarding process to streamline compliance and to broaden the scope of our screening.
- With operations worldwide, Cargill is obligated to comply with all applicable laws, including those regulating competition and sanctions, in all countries where we operate. Our Competition program supports our efforts to engage in fair and honest competition in markets where we operate.
- Cargill employees are expected to avoid all conflicts of interest. Employees that find themselves in a possible conflict must disclose the situation. We also have programs to protect the confidential information of our stakeholders and ourselves.

In addition to promoting and managing our compliance programs, we maintain systems and processes to audit and monitor ongoing compliance with Cargill policies. We also report on our Ethics and Compliance programs, our helpline (Ethics Open Line) volumes and trends, material investigations, and emerging risks to senior leaders and the Audit Committee of the Board of Directors.

Compliance training and communication

We provide employees with annual training and targeted communications to improve their understanding of ethics and compliance expectations, enhance awareness of compliance risks, provide guidance on courses of action, and increase transparency into how Cargill investigates and remediates issues of concern.

Each year, employees are required to complete online courses covering topics such as Cargill’s Code of Conduct, our ethical culture, conflicts of interest, competition, anti-bribery, information security, and data privacy. Additionally, we send out advisory emails reminding employees about our compliance policies and our commitment to ethical conduct.



“Cargill’s legacy, combined with the strength of our ethical culture, continues to play a pivotal role in helping fulfill our purpose – to nourish the world in a safe, responsible, and sustainable way.”

Anna Richo
General Counsel, Chief Compliance Officer, and Corporate Secretary, Cargill