

Cargill Modern Slavery and Human Trafficking Statement

Joint Statement – Cargill Australia Limited and Cargill Japan LLC for the period 1 June 2022 to 31 May 2023

This statement covers the activities of **Cargill Australia Limited** ACN 004 684 173 (**'Cargill Australia'**) and **Cargill Japan LLC** ARBN 097781452 (**'Cargill Japan'**) and their controlled entities to understand and implement actions to minimize the risk of modern slavery and human trafficking in our operations and supply chain. It also includes information more generally related to the activities of Cargill worldwide.

We empower and connect people and partners across our global supply chains and within the communities we serve.

- Respect internationally recognized human rights and treat people with dignity and respect in the workplace and in our communities.
- Convene stakeholders – from customers and farmers to governments and NGOs – to collaborate and co-create solutions to shared global challenges.
- Connect to a global community of more than a million producers – to increase productivity, market access, and expand responsible practices to nourish a growing population.
- Support communities and engage partners throughout the world in areas we operate through philanthropic giving, volunteerism and local outreach.

We consulted the relevant companies we own or control in the development of this statement.

Our priorities:

- Human Rights & Inclusion
- Food & Nutrition Security
- Farmer Prosperity
- Enriching Communities

Introduction

- This is the fourth Modern Slavery Statement (Statement) for Cargill Australia and Cargill Japan as set out in the Modern Slavery Act 2018 (Cth). This Statement is a joint statement by Cargill Australia and Cargill Japan. It only relates to the entities owned and controlled by Cargill Australia and Cargill Japan. The purpose

of this Statement is to outline our approach to ensuring we have robust frameworks and processes in place to minimize the risk of modern slavery in our operations and supply chain. It also includes information about the activities of Cargill globally to minimize the risk of modern slavery and human trafficking in our operations and supply chains.

- 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 160,000 employees in 70 countries who strive to feed the world in a responsible way and improve the communities where we live and work.

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.

Cargill Code of Conduct

Cargill has a strong set of values: put people first, do the right thing, and reach higher. Cargill's [Code of Conduct](#) outlines our company's ethical and compliance standards for conducting business throughout the world and serves as a guide for employees in conducting their daily work. Our Code is grounded in seven Guiding Principles that are ingrained in our culture and serve as the foundation for the behaviors expected from all employees.

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.

Cargill's Human Rights Policy

Our [Human Rights Policy](#) outlines our commitment to human rights within our operations and supply chains, and it applies to Cargill Incorporated and its subsidiaries. We also expect our suppliers and business partners to uphold these principles and urge them to adopt similar policies within their own businesses.

Cargill does not tolerate the use of any form of forced labor – including prison labor, indentured labor, bonded labor, and any forms of modern slavery or trafficking – anywhere in our own operations and supply chains.

Cargill's Human Rights Policy and other policies, which outlines Cargill's commitment to operating sustainable supply chains, respecting and supporting communities, and promoting an equitable, safe, and supportive workplace, can be found here:

<https://www.cargill.com/sustainability/reporting-hub>

Operating Responsible Supply Chains – Supplier Code of Conduct

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 fulfil that purpose—ethically and in compliance with applicable laws. Our Supplier Code of Conduct extends our seven 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 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 International Labor Organization (ILO).

CARGILL AUSTRALIA

Structure, Operations and Supply Chain

Established in 1967, Cargill Australia is an unlisted public company and the key flagship operating entity for Cargill in Australia. Cargill Australia is a wholly owned subsidiary of Cargill, Inc., a US based corporation and one of the world's largest, privately-owned businesses, providing food, agricultural, risk management, financial, and industrial products and services around the globe.

Cargill Australia services the country's large grain export commodities and has over time extended into grain and oilseed origination, oilseed processing and refining, processing and packing value add, seed distribution, grain and cotton trading, grain storage and handling as well as joint ventures including in beef processing.

Cargill Australia currently employs approximately 291 employees. Its operations take place in Australia with its head office located in Melbourne.

Cargill Australia's main operating entities include AWB GrainFlow Pty Ltd; Cargill Processing Limited; and Cargill Australia Financial Services Pty Ltd. Cargill Australia acts as local agent for Cargill Japan a registered foreign company operating in Australia.

Cargill Australia also has an interest in the following joint ventures:

- Teys Australia Pty Ltd – a beef processing and cattle feeding businesses. Head office located in Queensland.
- Cargill Altona Grain Partnership – storage and handling joint venture in Temora, NSW.
- Rightship Pty Ltd – Rightship helps customers manage marine risk by identifying and eliminating substandard ships from their supply chain. Head office located in Melbourne.

The joint ventures are either not reporting entities or will make their own reports.

CARGILL JAPAN

Structure, Operations and Supply Chain

Cargill Japan is a Japanese company (with no equivalent Australian liability to an Australian unlisted public company). Headquartered in Tokyo, Japan, Cargill Japan is wholly-owned by Cargill, Inc. and is mainly engaged in the wholesale of agricultural products and foods as well as the provision of agency, transportation, risk management and other services. Cargill Japan's subsidiary entities are engaged in providing purchasing agency services to Cargill Japan and purchases and sales of various foods and agricultural products.

Cargill Japan currently employees approximately 280 people.

Cargill Japan's operations mainly take place in Japan – locations in Tokyo and Kobe, Kansai. In addition, Cargill Japan has overseas branches and representative offices in Vancouver (Canada), Winnipeg (Canada), Bangkok (Thailand) and Melbourne (Australia).

Our integrated supply chain



Structure, Operations, Supply Chain

Cargill Australia: Corporate Functions

Main Operations

- Head office Operations located in Melbourne, Australia
- Direct Employment of workers
- Manages/operates joint ventures
- Acts as local agent for Cargill Japan

Supply Chain

- Office consumables
- Leased Office space
- Kitchen equipment/supplies
- Office equipment
- Technology (hardware, software and cloud services)
- Employment services – casual labor provided by professional services/recruitment providers
- Service providers who provide services to Cargill Australia, e.g. accounting, legal, cleaning, back office support
- Local office business services (i.e mail), catering, visitor/caller management

Cargill Australia: Origination

Main Operations

- Acquiring grain and oilseeds; provision of risk management products

Supply Chain

- Grain and oilseed products purchased from growers, traders
- Employment services – agents and distributors who provide professional services
- Service providers who deliver services to our origination business to facilitate for example, payments to growers, payment paperwork

Cargill Australia: Trading and Supply Chain

Main Operations

- Transporting/moving goods/ rail and truck
- Commodity Trading; sales and marketing
- Distribution of meals and oils
- Supply of specialty seed for oilseed production

Supply Chain

- Grain and oilseed products purchased from growers, traders
- Forward purchase contracts, cash at silo, hectare-based contracts
- Service providers, contractors and sub-contractors who deliver services to our supply chain business: road and rail transport providers; storage services; stevedoring and port terminal services; container packing; shipping agents

AWB GrainFlow: Storage and Handling

Main Operations

- Receiving, storing and out turning grains and oilseed

Supply Chain

- Site consumables (e.g. tarps, ground sheets, fuel, PPE, electricity, fumigant)
- Service providers, contractors and subcontracts who deliver services to our sites such as consulting services, OH&S services, waste removal, electrical/mechanical/civil maintenance, freight, fumigation, equipment certification, lease and hire equipment, security, drug and alcohol testing, IT
- Employment services – casual labor provided by professional services/recruitment providers

Cargill Australia and Cargill Processing, Crushing and Refining

Main Operations

- Process oil seeds to produce crude oil and oilseed crush by products
- Process crude oil to produce refined oil
- Cargill Processing – employs workers

Supply Chain

- Plant consumables
- Safety equipment (gloves, glasses, hard hats, etc)
- Maintenance consumables
- Production consumables (brooms, shovels, etc)
- Laboratory consumables (chemicals, lab equipment)
- Power and Gas
- Chemicals/processing aids (hexane, bleaching clay, etc)
- Plant and Equipment (motors, gear boxes, couplings, belts, conveyor chain, pumps, plant replacement, etc)
- Packaging Material (20L drums, cardboard, etc)
- Employment services – casual labor provided by professional services/recruitment providers

- Service providers who deliver services to our crushing and refining business such as consulting services, environmental services, maintenance contractors, electricians, cleaning, gardening
- Waste disposal (solid waste, liquid waste)

Cargill Japan: Corporate Functions

Main Operations

- Head office operations located in Japan
- Direct employment of workers
- Manages minor investments

Supply Chain

- Office consumables
- Leased Office space
- Kitchen equipment/supplies
- Office equipment
- Technology (hardware, software and cloud services)
- Service providers who provide services to Cargill Japan, e.g. accounting, legal, cleaning, back office support
- Local office business services (i.e mail); catering and entertainment; visitor/caller management

Cargill Japan: Food Purchase and Supply

Main Operations

- Purchases food products/materials

Supply Chain

- Cargill Japan purchases various foods/agricultural products/proteins from outside of Japan through Cargill group companies or external suppliers and sells these products to Japanese customers
- Cargill Japan procures risk management services and ocean transportation services from other Cargill entities

Potential Risks in Our Supply Chains

Cargill's approach:

- Is consistent with the UN Guiding Principles on Business and Human Rights and means that we focus our actions to address modern slavery risks as one of our highest risk areas globally. Cargill systematically assesses the risks of forced and child labor across its global supply chains.
- Involves deployment of a thorough risk assessment and prioritization methodology per business guided by credible data sources and subject matter expertise.
- (Specific to the entities discussed herein) Follows the guidance provided by the Australian Border Force "Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities." In other words, we identified the different parts of our

supply chain for each operation and considered risks that may cause or contribute to modern slavery practices. We also took into consideration other risk factors such as the sector, industry, types of products and services, geographic locations and business models.

- We recognize that our review and assessment of our actions to identify and address our modern slavery risks in our operations and across our supply chain will be an ongoing and evolving process. We are developing frameworks and processes to ensure we can review the effectiveness of the actions we are taking to assess and address modern slavery risks in our operations and supply chains and we are committed to continue to build upon this work.

Cargill takes a targeted risk-based approach to assessing and addressing modern slavery risks in its supply chains.

Potential Risks

Cargill Australia:

We identified potential “risk areas” of forced labor in relation to:

- origination of grain and oilseed – labor on grain growing farms;
- supply of road and rail transport, stevedoring, port terminals services, container packing, shipping agents and grain and meal storage;
- crushing and refining - supply of safety, maintenance and production supplies, lab supplies/consumables, chemicals, plant and equipment and capital, waste disposal and/or transportation of these materials;
- storage and handling - supply of materials, supplies, equipment, workforce labor, maintenance and engineering works and transportation of goods.

Cargill Japan:

- The risk that suppliers of food products and materials are engaged in modern slavery practices.

Addressing the Risks

The qualitative task risk assessment and prioritization methodology undertaken involved identifying risks and defining identified risks as “high”, “medium” and “low”. For each identified risk we then identified the defense layers and control measures that are in place and any proposed changes or ways to eliminate or reduce identified risks.

For tasks identified as “High Risk,” additional defense layers must be implemented with high priority to reduce risk. For tasks identified as “Medium Risk,” additional defense layers must be developed and implemented. Tasks identified as “Reduced Risk,” may continue to be performed with existing safety processes and managed for continuous improvement.

Cargill Japan engages in a thorough due diligence process prior to doing business with external suppliers. This involves Cargill representatives undertaking site visits and

inspections of potential supplier premises; having suppliers complete and attest to certain matters in an Initial Self-Assessment Questionnaire; and the undertaking of risk assessments, audits and follow ups if required.

In relation to modern slavery risks Cargill Australia Limited (trading as AWB), AWB Grainflow Pty Ltd, and Cargill Processing Limited address risks in a variety of ways:

- We have our suppliers agree to follow Cargill's Supplier Code of Conduct <https://www.cargill.com/about/supplier-code-of-conduct>.
- Our origination field teams are provided regulatory and ethics training on a regular basis and conduct regular farm visits.
- In relation to our supply chain operations, road freight is heavily regulated by NHVR and rail is heavily regulated by ONRSR. The majority of Cargill road carriers are NHVAS accredited and externally audited. Cargill conducts random audits. Stevedore and Port Terminal Services pay and working conditions are Union regulated. All managed spend, container packing and bulk storage is contracted and suppliers contractually agree to follow Cargill's Supplier Code of Conduct.
- All major suppliers to our oilseed crushing and refining operations (safety, maintenance and production suppliers, chemical, processing aids, plant and equipment, packaging materials, employment services, waste disposal, maintenance contractors, electricians, cleaning, gardening, laboratory consumables and consulting services) contractually agree to follow Cargill's Supplier Code of Conduct. The majority of our maintenance and construction contractors are trade certified and covered by Government Awards.
- A number of the larger contracts in our GrainFlow storage and handling business are managed services in relation to which suppliers contractually agree to follow the Cargill Supplier Code of Conduct. GrainFlow has controls and systems in place to manage workforce fatigue and health and safety. Invoices from suppliers are itemized and reviewed to ensure correct pay allocations. For large spend areas Cargill also tenders for supply on a regular basis with site visits of certain suppliers where required.

Our Approach

We believe it is essential that all parties in the supply chain – industry, government and non-governmental organisations (NGOs) – work together to address these complex problems, support rural communities 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 protecting the rights of children, to raise awareness of labor issues and improve working practices through training and education of farmers, their communities and families. We are actively working towards eradicating child labor in the cocoa supply chain. To address the root causes of child labor, we are combining CLMRS (Child Labor Monitoring & Remediation System) with preventative measures such

as community development, women's empowerment, and opportunities for youth.

- **Soy** – our commitment to sustainable soy production, laid out in [Cargill's Policy on Sustainable Soy – South America Origins](#), includes creating transparency in our supply chain while also enabling our farmer partners to mature in their social sustainability journey. Our 4-step due diligence process ensures that we are accurately polygon-mapping our suppliers and acting on non-conformances once issues are identified. Further, [Cargill's South American Soy Action Plan](#) commits to a transparent and sustainable South American soy supply chain that respects and upholds the rights of workers, indigenous peoples and communities.
- **Palm** – Cargill has a global [Policy on Sustainable Palm Oil](#) through which we monitor our supplier's compliance against our own guidelines and industry-wide frameworks. As Cargill largely operates between growers and consumers, we commit to using this position to influence organizations both up and down our value chains to engage in 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. To address labor and human rights issues in the palm oil supply chain, we prioritize engagement based on varying levels of severity and impact to drive long-term capability and compliance improvements. When a supplier is unable or unwilling to make progress within the agreed upon timeframe, or has repeated non-compliances, we remove the supplier from our supply chain.
- **Cotton** – We are committed to improve responsible sourcing and sustainability across the [cotton](#) supply chain. We also support the work being done by governments and organisations 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 assurance organisations like 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. As part of our human rights due diligence process we continue to assess human rights risks at high-risk sourcing countries and engage with suppliers and rightsholders to build capabilities and mitigate risks accordingly.
- **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 use annual SMETAs (Sedex Members Ethical Trade Audits) or equivalent audits to verify that we operate to a high ethical standard. We also partner with ethical trade nonprofit consultancies to focus improvements on labor

conditions in our supply chain.

- **Aquaculture Feed** – Beyond utilizing Cargill's Supplier Code of Conduct, our global aquaculture feed business developed a distinct Sourcing Policy that carries specific reference to ILO International Labor Standards. Through these normative documents, we conduct assessments of our aquaculture feed ingredient supply chains on the risk of modern slavery and human trafficking. Assessments centre on the country of origin and supply sector, and suppliers identified as working in high-risk countries or sectors are contacted individually and asked to provide more details about how they work to mitigate risk. For our production operations in the UK – a feed mill in Westfield, Scotland – and with respect to the UK Modern Slavery Act, this includes risk assessments of all suppliers. In addition, we will also pursue Aquaculture Stewardship Council (ASC) certification for feed mills, which requires risk assessments and due diligence processes on working conditions and human rights along the OECD principles, and have initiated intensive human rights assessments on more than ten key supply chains with two specialist third-party organisations.

More information on the actions we are taking in our supply chains can be found in Cargill's [ESG report](#).

Human Rights Due Diligence

Foundational to our strategy is a risk management process to proactively identify and manage human rights impacts. We are continuously enhancing our human rights due diligence program to identify, prevent, mitigate and account for human rights impacts in our operations and supply chains. We take guidance from the UN Guiding Principles on Business and Human Rights and the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Business Enterprises.

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.

Raising grievances

In line with the UN Guiding Principles on Business and Human Rights, where we have caused or contributed to adverse impacts on people, we are committed to providing or contributing to remedy, including through our existing grievance channels – for instance our [Soy Grievance Process](#) and [Palm Grievance Process](#). We continue to increase awareness of our grievance channels among workers and community members, including in our supply chains. Individuals can raise any concerns anonymously about the conduct of a Cargill employee or business through the [Cargill's Ethics Open Line](#) which is available 24 hours a day, 7 days a week for employees and third parties

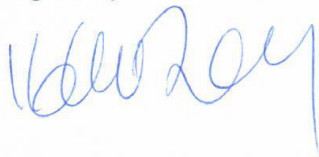
anywhere in the world (subject to certain countries' legal limitations). This channel is managed by a third-party to secure confidentiality and protection from retaliation.

This Statement is made pursuant to section 14 of the Modern Slavery Act 2018 and constitutes the Cargill group's slavery and human trafficking statement for the financial year ending 31st May 2023.

This Joint Statement has been approved by:

The Board of Cargill Australia Limited on 24 November 2023

Signed by:



Zsolt Kocza, Managing Director, Cargill Australia

Cargill Japan LLC on 24 November 2023

Signed by:



Tatsuo Ishii, President, Cargill Japan LLC