

Cargill Human Rights Disclosure

FY2025



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Introduction

At Cargill, Incorporated (herein referred to as “Cargill” or “the Company”), we provide food, ingredients, agricultural solutions, and industrial products to nourish the world in a [safe, responsible, and sustainable way](#). We connect farmers with markets, customers with ingredients, and families with daily essentials. Headquartered in Wayzata, Minnesota USA, we have more than 150,000 employees, operating in 70 countries. The Company markets its products principally in four geographic regions: Asia/Pacific, Europe/Africa, Latin America and North America.

Human rights are fundamental at Cargill, and we respect the human rights of our employees and 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 Labour Organization Fundamental Principles and Rights at Work. As a signatory of the [United Nations Global Compact](#) (UNGC), we are committed to promoting human rights.

Cargill's [Impact Report](#) details the progress we are making towards meeting our sustainability goals and the work we're doing to drive greater global impact across our operations, supply chains and communities; including our work to mitigate human rights risks within our supply chains.

Scope of Disclosure

This report sets out the approach taken to prevent and reduce the risk of child labour, forced labour, modern slavery and human trafficking, as part of Cargill, Incorporated, in our business operations and supply chains. The actions described in this report are implemented across our businesses and supply chain teams in countries where we operate using a risk-based approach. As a result, certain supply chains and/or geographies are at different stages of implementation.

This report is a joint statement to cover the following Cargill entities for the period June 1, 2024, to May 31, 2025:

- Cargill Australia Limited ACN 004 684 173 (**‘Cargill Australia Limited’**) and Cargill Japan LLC ARBN 097781452 (**‘Cargill Japan’**)
- Cargill Limited (**“Limited”**), Precision Agricultural Services Inc. (**“Precision”**) and EWOS Canada Ltd. (**“EWOS”**) (Limited, Precision and EWOS are referred to herein collectively as **“Cargill Canada”**)
- Cargill International SA in Geneva (**“CISA”**)
- Cargill PLC (**“PLC”**), EWOS Limited (**“EWOS”**), Cargill Bioindustrial UK Limited (**“CBI”**), Provimi Limited (**“Provimi”**), Sun Valley Foods Limited (**“Sun Valley”**), Cargill Cotton Limited (**“Cargill Cotton”**) and Cargill Global Funding PLC (**“Cargill Global Funding”**). PLC, EWOS, CBI, Provimi, Sun Valley, Cargill Cotton and Cargill Global Funding are referred to herein collectively as **“Cargill UK”**
- Cargill, Incorporated (California, US)

This disclosure is intended to cover the laws listed below. In some instances, those laws require more specific detail which can be found in the country specific disclosures in the Appendices.

- Australia Modern Slavery Act 2018
- Canada Fighting Against Forced Labour & Child Labour in Supply Chains Act

- Art. 964j-Art. 964l of the Swiss Code of Obligations (CO) and the Swiss Ordinance on Due Diligence and Transparency in Relation to Minerals and Metals from Conflict-Affected Areas and Child Labour (DDTrO)
- United Kingdom Modern Slavery Act 2015
- California Transparency in Supply Chains Act

Our Approach:

In accordance with Cargill's Code of Conduct, Human Rights Policy, Human Rights and Environmental Due Diligence Policy and country-specific laws as detailed above, Cargill conducts human rights due diligence to help identify, prevent, mitigate and remediate relevant human rights risks.

Governance

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 Senior Director of Responsible Sourcing and the Global Human Rights 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.

Code of Conduct

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. Guiding Principle #5, "We treat people with dignity and respect", addresses our commitment to human rights. It expressly states that Cargill will "Act to eliminate any form of forced labour – and work to eradicate child labour – from our own operations and supply chains". In addition, it is mandatory that all banded employees complete annual training on the Code of Conduct.

Supplier Code of Conduct

Our [Supplier Code of Conduct](#) extends our seven Guiding Principles into the supply chain and is translated into nearly thirty languages. These Guiding Principles are as follows:

1. Obey the law
2. Conduct business with integrity
3. Keep accurate and honest records
4. Honor business obligations
5. Treat people with dignity and respect
6. Protect Cargill's information, assets and interests
7. Be a responsible global citizen

It requires suppliers, farmers, producers, manufacturers, and other business partners (each a "Supplier Partner") to work with us to fulfil our 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. The Supplier Code of Conduct enlists our Supplier Partners in upholding the same principles we expect of our employees through our Code of Conduct, and all Cargill suppliers must abide by this Code. We believe a joint commitment

to ethical conduct and integrity is a strong foundation for trusted business relationships that create shared value.

Human Rights Policy

Our [Human Rights Policy](#) further outlines our commitment to human rights within our operations and supply chains and is translated into more than 20 different languages. Cargill expects Suppliers to uphold the principles outlined in Cargill's Human Rights Policy and take guidance from the International Labour Organization Fundamental Principles and Rights at Work. Cargill requires that Suppliers act to eliminate any form of forced labour and work to eradicate child labour from their operations and supply chains. Additionally, our Human Rights and Environmental [Grievance Process](#) provides a framework for stakeholders to raise concerns related to human rights.

Forced labour

Cargill does not tolerate the use of any form of forced labour – including all prison labour, indentured labour, bonded labour, and any forms of modern slavery or trafficking – both in our own operations and supply chains. Cargill complies with policies and applicable law. Cargill's [Code of Conduct](#) and [Supplier Code of Conduct](#) require the following:

Respecting the terms and conditions of employment with transparency: Terms and conditions of employment are communicated to workers in a language they understand, and changes are communicated transparently. All workers are free to terminate employment upon reasonable notice.

Allowing workers to have freedom of movement: Workers can move freely and are not restricted through abuse, physical force, or threats of violence or reprisals.

Recruiting Responsibly: Employees are forbidden to pay recruitment or similar fees to obtain employment. The costs of recruitment are borne by Cargill. Further, temporary foreign workers are accorded treatment and protection equal to other workers and retain control over their personal identification documents and other valuable possessions. In addition, Cargill suppliers must not use any form of forced, bonded, indentured, or prison labor. Workers must have freedom of movement, access to identity documents, and no recruitment fees.

Child Labour

At Cargill we work to eradicate child labour from our operations and supply chains. We implement appropriately designed due diligence systems that are intended to identify, prevent and remediate child labour. We will not hire individuals under the legal working age or the mandatory age of schooling (whichever is lower). Cargill does not tolerate the use of any form of forced labour – including all prison labour, indentured labour, bonded labour, modern slavery or trafficking – anywhere in our own operations and supply chains. Suppliers must not employ children below the minimum age as defined by ILO Convention 138 and 182, or local law (whichever is higher) and cannot allow hazardous work for any employee under the age of 18.

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.

[Cargill's Human Rights and Environmental Due Diligence Policy](#) brings clarity to our due diligence process for identifying risks and has been designed to specifically address risks associated with human rights and environmental impacts within our own operations, supply chains, and business relationships. Our work in this area is supported by a multidisciplinary team to implement this process across our businesses. We are committed to regularly evaluating and strengthening our process to identify, prevent, mitigate, and remediate adverse human rights and environmental impacts within our own operations, supply chains, and business relationships.

Operating Responsible Supply Chains

Identify and Assess

Cargill's global human rights due diligence program is designed to identify and address human rights-related risks across our own operations and supply chains. This program is applied using a risk-based approach, beginning with an Abstract Risk Assessment (ARA) to evaluate general risks associated with geography and commodity. Suppliers identified as high risk through the ARA proceed to a more detailed Concrete Risk Assessment (CRA), which includes a self-assessment questionnaire. This tool enables a supplier-specific evaluation of how risks are being managed through mechanisms such as policies, procedures, and audits. If a supplier continues to be categorized as high risk following the CRA, tailored action plans are developed collaboratively to mitigate those risks. Cargill's Code of Conduct and Human Rights Policy outline our global standards and expectations for respecting and promoting human rights across all business entities and supply chains. As a global company, we recognize our responsibility to act decisively when modern slavery violations are identified. This includes conducting thorough investigations, engaging affected stakeholders, and implementing remediation plans that prioritize the wellbeing of impacted individuals. We are committed to taking corrective action, which may include enhanced oversight, supplier disengagement, or collaboration with local authorities and NGOs to support recovery and prevention efforts.

Our approach is grounded in internationally recognized human rights frameworks and reinforced through periodic and targeted assessments of our global operations, national-level risk analyses, and supplier-specific due diligence. We expect all supply chain and business partners to uphold the principles outlined in our Code of Conduct and Human Rights Policy—treating workers with dignity and respect, complying with applicable labour laws, and actively working to prevent human rights abuses. Through transparency, accountability, and continuous improvement, we aim to drive meaningful change and uphold our commitment to ethical and responsible business practices worldwide.

Monitoring performance & effectiveness

Track

To track compliance with Modern Slavery legislations, Cargill has implemented a structured, risk-based approach that includes publishing an annual Human Rights and Modern Slavery Disclosure;

mapping global supply chains to identify high-risk areas; and conducting regular risk assessments and due diligence. This involves using tools like supplier self-assessments, audits, and worker interviews. Confirmed violations trigger corrective actions and remediation efforts, while Cargill also sets measurable KPIs, provides training to staff and suppliers, and aligns its practices with international frameworks such as the UN Guiding Principles. Transparency, continuous improvement, and stakeholder engagement are key to maintaining accountability and driving meaningful change.

Report

Cargill communicates its performance on human rights—including forced labour and child labour—that reflects its global footprint and commitment to transparency. This includes publishing annual Human Rights and Modern Slavery Disclosure in compliance with legislation in the UK, Australia, California, Canada, Norway and Switzerland. These reports detail Cargill's risk-based due diligence processes, supplier assessments, remediation actions, and training programs. Cargill also submits an annual Communication on Progress (CoP) to the UNGC, outlining its alignment with the Ten Principles and Sustainable Development Goals (SDGs), including those related to labour rights and human rights. These disclosures are supported by Cargill's Human Rights Policy, Human Rights and Environmental Due Diligence Policy, Supplier Code of Conduct, and grievance mechanisms, and are made publicly available through corporate websites and government registries to ensure accountability and stakeholder engagement.

Training

Cargill employees receive annual training on the Cargill Code of Conduct, which prohibits forced and child labour.

In addition, Cargill offers relevant employees robust training on the definitions of human rights issues and their root causes, and enhancing skills to identify, analyze and resolve human rights issues in our operations and supply chains. Additional human rights training for relevant employees covers Cargill's Human Rights Strategy Framework and policy, including an overview of forced and child labour and child protection.

Raising grievances

Cargill's [grievance channel](#) is in line with the UN Guiding Principles on Business and Human Rights; where we have caused or contributed to adverse impacts on people, we will provide or contribute to a remedy for the impact. 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 [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.

Cargill maintains accessible and confidential grievance mechanisms that allow workers, suppliers, and other stakeholders to report concerns related to forced labour, child labour, or other human rights violations. These channels are available across our global operations and supply chains and are designed to ensure that all reports are taken seriously, investigated promptly, and resolved transparently. When grievances are substantiated, we implement appropriate remediation measures, which may include corrective action plans, supplier engagement, or disengagement where necessary.

We also take steps to mitigate potential harm to affected individuals, including income loss for vulnerable families, in line with international best practices. Oversight of grievance management is embedded in our governance structure, with cross-functional teams—including legal, procurement, and sustainability—ensuring accountability. Insights from grievance data are used to strengthen our due diligence processes, inform training programs, and continuously improve our approach to preventing and addressing modern slavery risks.

Assessing the Effectiveness of our Measures

Cargill works with customers, suppliers and service providers to learn about and resolve complaints and conflicts in its own operations and supply chains through an open, accessible, transparent and consultative process. Cargill is taking measures to remediate any instances of forced or child labour, modern slavery and human trafficking that are identified and to remediate any loss of income to the most vulnerable families that results from any such measures taken.

We continue to increase awareness of the opportunities for workers and other stakeholders in our supply chains, including community members, to bring concerns to the attention of Cargill. Individuals can anonymously report on the conduct of a Cargill employee or business through the [ethics open line](#).

Cargill also enforces an Anti-Retaliation Policy which applies to all employees, agents, contractors, and others acting on behalf of Cargill. This policy encourages employees to report unlawful or unethical behaviours and requires protection of those employees from retaliation after they report in good faith.

References

[Sustainability at Cargill](#)

[Human Rights and Environmental Due Diligence Policy](#)

[Code of Conduct](#)

[Supplier Code of Conduct](#)

[Corporate Due Diligence Policy](#)

[Ethics Open Line](#)

[Grievance Process](#)

[ESG Reporting Hub](#)

[Impact Report](#)

Appendix

This is a joint disclosure, prepared in consultation with reporting entities, including providing the entities an opportunity to participate.

Australia and Japan

This statement covers the activities of Cargill Australia Limited ACN 004 684 173 ('**Cargill Australia Limited**') 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.

Established in 1967, Cargill Australia Limited is an unlisted public company and the key flagship operating entity for Cargill in Australia. Cargill Australia Limited is a wholly owned subsidiary of Cargill, Inc.

Cargill Australia Limited services the country's large grain export commodities and has over time extended into grain and oilseed origination, provision of risk management products, transportation, storage and distribution of grain and oilseed products, 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. The supply chains that support the listed activities include but are not limited to grain and oilseed products purchased from growers and traders, employment services, and service providers.

Cargill has completed their ARA for Australia and potential high-risk suppliers have been identified to move forward to the CRA.

Cargill Australia Limited currently employs approximately 211 employees. Its operations take place across locations in Victoria, New South Wales, South Australia, Western Australia, and Queensland with its head office located in Melbourne.

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

Cargill Australia Limited 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. Teys will become a wholly owned subsidiary of Cargill, pending regulatory approval expected to be finalized in the second half of 2025.
- Cargill Altora 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 for FY25.

Cargill Japan LLC (CJL) 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.

The supply chains that support Cargill Japan include but are not limited to various foods/agricultural products/proteins from outside of Japan through Cargill group companies or external suppliers, risk management services and ocean transportation services from other Cargill entities.

Cargill plans to initiate its ARA for Japan in July 2026, with completion anticipated in time for inclusion in the FY26 report.

Cargill Japan currently employees approximately 250 people.


Cargill Japan's operations mainly take place in Japan - location in Tokyo. In addition, Cargill Japan has overseas branches and representative offices in Vancouver (Canada), Winnipeg (Canada) and Melbourne (Australia).

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 2025.


This Joint Statement has been approved by:

The Board of Cargill Australia Limited on 11/01/2025

Signed by:

Signed by:

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Zsolt Kocza, Managing Director, Cargill Australia Limited

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Tatsuo Ishii, President Cargill Japan LLC