

#### January 2015

# Guiding Principles Reminders Frequently Asked Questions

The Ethics Open Line

As an employee of Cargill, you play a vital role in helping the company maintain its commitment to our Guiding Principles and doing business in the right way. Sometimes, you may witness an incident or action that is not consistent with our values, but are unsure of what to do. While reporting misconduct takes courage, it's the right thing to do and helps Cargill maintain its reputation as an ethical company.

#### Who should I turn to if I have a concern?

When you observe some behavior that you believe violates our Guiding Principles and related Compliance Policies, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, or other member of your management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that we have partnered with a third-party vendor and created the **Ethics Open Line**. We would rather you report anonymously than keep the information to yourself.

#### When I submit a report on the Ethics Open Line, where does it go? What will be done?

Reports are entered directly on a secure server to prevent any possible breech in security. The reports are available only to specific individuals within Cargill who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.

### How confidential is the Ethics Open Line? I'm worried that people may learn about my report and get me into trouble.

Our vendor, EthicsPoint, is an industry leader in helping companies provide a confidential and anonymous way to express concerns or report incidents of misconduct. When you make a submission through the Ethics Open Line, you receive a report key and password to monitor progress on your report. At all times, confidentiality will be maintained to the greatest extent possible under the circumstances.

In addition, it is a stated Cargill policy that we will not tolerate retaliation or threat of retaliation against employees who in good faith report, oppose, or participate in the investigation of suspected unethical or unlawful activities or other cases of misconduct in or related to its business activities.

## I'm not sure if any misconduct actually occurred, I just don't feel right about something. What should I do?

File a report. Assistance through the Ethics Open Line can help you prepare and file your report so it can be properly understood. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you weren't sure.

Even if misconduct didn't take place, other positive actions can result from a report, such as clearer communication or additional training on important policies.

#### **Quick Facts**

#### **To call the Ethics Open Line:**

- Inside the United States, dial 1-800-357-OPEN (6736)
- Outside the United States, access the Ethics Open Line website at www.CargillOpenLine.com where you will find a hotline number for your country / region.

### To send a message to the Ethics Open Line:

 Access www.CargillOpenLine.com from any computer with internet access.

# Additional Resources available about the Ethics Open Line:

To learn more about the Ethics Open Line and instructions for its use, you may consult:

- The Cargill Code of Conduct
- The Ethics and Compliance pages on the Cargill Connects employee website
- The Ethics Open Line website at www.CargillOpenLine.com

