

I. EXTERNAL DESCRIPTION GRIEVANCE PROCESS FOR CARGILL'S POLICY ON SOY SOUTH AMERICAN ORIGINS ("SOY GRIEVANCE PROCESS") – (Created March 2020)

1. BACKGROUND

Cargill's Policy on Sustainable Soy – South American Origins ("Soy Policy") commits to work with parties to resolve complaints and conflicts in the South American soy supply chain through an open, accessible, transparent and consultative process.

Under this framework, where suppliers' practices regarding sustainability raise concerns among our stakeholders, we have created a grievance procedure to address these in a timely, transparent, equitable and participatory manner, so we can ensure progress.

Implementing an effective grievance mechanism is a part of being a responsible global citizen, in line with Cargill's Code of Conduct and Guiding Principles, Commitment on Human Rights, and Supplier Code of Conduct.

Cargill will continue to consult with stakeholders and review our Grievance Process on a regular basis to ensure efficacy.

2. OBJECTIVES

Cargill's South American Soy Grievance Process ("Soy Grievance Process") serves as a guide to review, address, and monitor the outcome of any grievance concerning the Soy Policy across Cargill's South American supply chain. It aims at providing a clear, predictable and effective path of action.

Cargill's strategy aims to achieve long-term transformation of our supply chains. We engage and support our suppliers in addressing non-compliances through time-bound action plans. If a supplier does not want to engage in this Grievance Process in good faith, Cargill will cease doing business with that supplier.

3. SCOPE

This Procedure covers grievances related to Cargill's origination of soybeans in Brazil, Argentina, Paraguay, Bolivia and Uruguay. The Procedure applies to both direct and indirect suppliers.

If a grievance relates Cargill's own operations – such as warehouses, plants or ports, it will be managed through the regular Ethics Open Line process flow.

A "grievance" is a complaint or concern, associated with the implementation of Cargill's Soy Policy, which an individual or a group seeks to address with Cargill. A grievance must be raised in writing, by email, or via [Cargill's Ethics Open Line](#) system.

Cargill has a long-standing Ethics Open Line accessible through the web and by telephone, hosted by third party Navex Global on a secure and independent site.

The Ethics Open Line is confidential and available 24 hours a day, 7 days a week in multiple languages. It provides mechanisms for anonymous reporting and gives people tools to track the progress of their report or respond to follow-up questions.

This Soy Grievance Process is deployed by Cargill to handle any grievance identified and raised by internal or external parties, including individuals, employees, contractors, suppliers, and civil society organizations, concerning compliance of the Soy Policy. This includes recording grievances, verifying claims, rectifying confirmed issues, reporting key performance indicators, delivering responses to stakeholders and managing and monitoring follow-up actions.

When a report regarding a third-party supplier is submitted to Cargill, we will engage the grievance raiser and the grievance subject to discuss the issues raised in accordance with this procedure, with the objective of resolving the issues where they have been confirmed.

Cargill prohibits harassment, intimidation and the use of violence by any employee, supplier, third party and contractor throughout engagement in the Soy Grievance Procedure. Cargill will not tolerate retaliation against anyone who, in good faith, raises a concern or participates in an investigation or whistleblowing.

(a) Grievances against suppliers

There are two situations related to grievances against suppliers:

1. Cargill is sourcing directly from a supplier against whom a grievance has been raised (direct supplier).
2. Cargill is sourcing through an intermediary from a supplier against whom a grievance has been raised (indirect supplier).

In cases related to indirect suppliers, where Cargill is impacted through intermediary relationships, the company's internal team will provide guidance to the indirect supplier to deal with this issue and engage its direct supplier. Cargill will continuously and closely monitor implementation of this process and developments of the grievance.

(b) Non-soy commodities and non-South America origins

The scope of this Grievance Process is limited to Cargill's soy supply chain in South America. Other commodities and/or locations are out of scope. However, areas where other commodities such as maize, cotton and wheat are grown in rotation with soy are included in the scope of this procedure.

Regardless, all suppliers remain subject to Cargill's Supplier Code of Conduct and the Forest Policy. Grievances outside the scope of this Process will be managed through Cargill Ethics Open Line.

4. REFERENCES

This Soy Grievance Process is developed as a part of our Soy Policy and is based on the following guidelines:

- a) [Cargill Code of Conduct & Guiding Principles](#)
- b) [Cargill Supplier Code of Conduct](#)
- c) [Cargill Policy on Forests](#)
- d) [Cargill Policy on Sustainable Soy -- South American Origins](#)
- e) [Cargill South American Soy Action Plan](#)
- f) [Cargill Commitment on Human Rights](#)

5. PROCEDURE

a) The grievance may be raised by any external stakeholder or Cargill employee through three channels available to receive grievances. These are listed below.

- Via internet or phone through Cargill Ethics Open Line: In this case, the grievance is received through Cargill's Global Ethics & Compliance Office (GECO) and then forwarded to the member of the Sustainability team responsible for the grievance process
- E-mail: Ideally directed to the e-mail soy_grievancecoordinator@cargill.com
- Letter: Handed out in person to members of the Sustainability team or addressed to the South America Soy Sustainability Grievance Coordinator, located in Brazil headquarters Av. Dr. Chucri Zaidan, 1240 – 6th floor – Diamond Tower – São Paulo – SP – Brazil

Contact details are required to seek further clarification on the grievance. The party reporting the grievance (grievance raiser) may request that their identity remain confidential. Any party may appoint a third-party to submit their grievances provided that the third-party follows the procedure.

To process a grievance, it should contain the information below. Without such information we may not be able to perform an investigation.

- Full name of the contact person/ grievance raiser (can be anonymous)
- Name of organization (if any)
- Job title (if any)
- Address
- Phone Number/Email Address (at least one contact point)
- Description of the grievance in detail
- Evidence to support the grievance investigation (e.g., pictures, documents, minutes of meetings, public consultations, location point or polygon, etc. If deforestation, add a location point or polygon.)

In addition to grievances submitted through the official channels above, issues raised through unofficial channels, such as the media and the internet, may be investigated and recorded as a grievance, if accepted.

6. GRIEVANCE PROCEDURE PROCESS FLOW

