

F0. Introduction

F0.1

(F0.1) Give a general description of and introduction to your organization.

Cargill's 155,000 employees across 70 countries work relentlessly to achieve our purpose of nourishing the world in a safe, responsible and sustainable way. Every day, we connect farmers with markets, customers with ingredients, and people and animals with the food they need to thrive. We combine 155 years of experience with new technologies and insights to serve as a trusted partner for food, agriculture, financial and industrial customers in more than 125 countries. Side-by-side, we are building a stronger, sustainable future for agriculture.

F0.2

(F0.2) State the start and end date of the year for which you are reporting data.

	Start Date	End Date
Reporting year	January 1 2019	December 31 2019

F0.3

(F0.3) Select the currency used for all financial information disclosed throughout your response.

USD

F0.4

(F0.4) Select the forest risk commodity(ies) that you are, or are not, disclosing on. For each forest risk commodity selected, identify the stages of the supply chain which best represents your organization's area of operation.

	Commodity disclosure	Stage of the value chain	Explanation if not disclosing
Timber products	Not disclosing	Processing	While we source fiber-based packaging for use in our own operations, we do not produce, process, manufacture or sell it. Nonetheless, we have a Policy on Sustainable Fiber-Based Packaging since 2017.
Palm oil	Disclosing	Production Processing Trading Manufacturing	<Not Applicable>
Cattle products	Not disclosing	Processing	Cargill does not source cattle from tropical regions.
Soy	Disclosing	Processing Trading Manufacturing Retailing	<Not Applicable>
Other - Rubber	This commodity is not produced, sourced or used by our organization	<Not Applicable>	<Not Applicable>
Other - Cocoa	Disclosing	Processing Trading Manufacturing	<Not Applicable>
Other - Coffee	This commodity is not produced, sourced or used by our organization	<Not Applicable>	<Not Applicable>

F0.5

(F0.5) Are there any parts of your direct operations or supply chain that are not included in your disclosure?

No

F1. Current state

F1.1

(F1.1) How does your organization produce, use or sell your disclosed commodity(ies)?

Palm oil

Activity

Growing/production of raw materials
Harvesting
Milling
Crushing
Refining & fractionation
Exporting/trading
Using as input into product manufacturing

Form of commodity

Fresh fruit bunches (FFB)
Crude palm oil (CPO)
Crude palm kernel oil (CPKO)
Refined palm oil
Palm oil derivatives
Palm kernel oil derivatives

Source

Owned/managed land
Smallholders
Multiple contracted producers
Trader/broker/commodity market
Contracted suppliers (processors)

Country/Area of origin

Brazil
Cambodia
Cameroon
Colombia
Costa Rica
Ecuador
Guatemala
Honduras
Indonesia
Malaysia
Mexico
Nicaragua
Panama
Papua New Guinea
Peru
Thailand
Venezuela (Bolivarian Republic of)

% of procurement spend

Not applicable

Comment

Cargill has company-owned palm plantations in Indonesia: PT. Hindoli in South Sumatra; PT. Harapan Sawit Lestari, PT. Indo Sawit Kekal and Poliplant in West Kalimantan. Cargill operates 9 palm oil mills and 3 kernel crushing plants in Indonesia which process FFBs from its own plantations as well as independent and contracted smallholders. Cargill also operates 17 refineries globally. Palm oil and derivatives are used to produce animal feed and food ingredients. Focus has been on its business units that are the primary producers, traders and processors of palm and have the greatest material risk. Future efforts may include additional food and feed supply chains to be assessed.

Soy

Activity

Crushing
Refining & processing
Exporting/trading
Using as input into manufacturing process for power generation
Buying manufactured products

Form of commodity

Whole soy beans
Soy bean oil
Soy bean meal
Soy derivatives
Soy biodiesel

Source

Smallholders
Single contracted producer
Multiple contracted producers
Trader/broker/commodity market
Contracted suppliers (processors)
Contracted suppliers (manufacturers)
Other, please specify (Multiple non-contracted producers)

Country/Area of origin

Argentina
Bolivia (Plurinational State of)
Brazil
Paraguay
Uruguay

% of procurement spend

Please select

Comment

Cargill has five global enterprises, comprising multiple businesses, operating in 70 countries, and across four sectors: food, agriculture, financial and industrial products and services. Many of these businesses purchase soybeans and/or soy derivatives. Individual businesses track the country of origin, but do not report this at the corporate level. The vast majority of soybeans and soy derivatives Cargill processes and trades are from three countries: the U.S., Brazil and Argentina. Some other countries of origin are noted here because these are the most relevant country / region of origin. Soy is used to produce animal feed, food ingredients and biodiesel. Soy meal and oil are used to feed livestock and poultry in Cargill's animal protein business.

Other - Cocoa

Activity

Refining & processing
Exporting/trading

Form of commodity

Other, please specify (Cocoa beans, Cocoa butter, Cocoa liquor, Cocoa powder, Cocoa Liquor, Chocolate products)

Source

Smallholders
Multiple contracted producers
Trader/broker/commodity market

Country/Area of origin

Brazil
Cameroon
Colombia
Congo
Côte d'Ivoire
Dominican Republic
Ecuador
Ghana
Grenada
India
Indonesia
Liberia
Madagascar
Nigeria
Panama
Papua New Guinea
Peru
Sao Tome and Principe
Uganda
United Republic of Tanzania
Venezuela (Bolivarian Republic of)

% of procurement spend

Please select

Comment

Cargill Cocoa & Chocolate sources, exports and ships cocoa beans in origin countries Ghana, Côte d'Ivoire, Cameroon, Indonesia, Brazil. The vast majority of directly sourced cocoa and cocoa products are sourced from the latter 5 countries. Cargill operates processing facilities for pressing cocoa and conching chocolate in the Netherlands, Belgium, France, Germany, Ghana, Côte d'Ivoire, Indonesia

F1.2

(F1.2) Indicate the percentage of your organization's revenue that was dependent on your disclosed forest risk commodity(ies) in the reporting year.

	% of revenue dependent on commodity	Comment
Timber products	<Not Applicable>	<Not Applicable>
Palm oil	Please select	Cargill considers this information proprietary
Cattle products	<Not Applicable>	<Not Applicable>
Soy	Please select	Cargill considers this information proprietary
Other - Rubber	<Not Applicable>	<Not Applicable>
Other - Cocoa	Please select	Cargill considers this information proprietary
Other - Coffee	<Not Applicable>	<Not Applicable>

F1.3

(F1.3) Provide details on the land area you control and/or manage that is used for the production of your disclosed commodity(ies)?

Forest risk commodity

Palm oil

Type of control

Own land

Country/Area

Indonesia

Land type

<Not Applicable>

Area (Hectares)

93459.92

% Area certified

68.84

Certification scheme

RSPO producer/grower certification

International Sustainability and Carbon Certification (ISCC)

Other, please specify (Indonesia Sustainable Palm Oil, ISO 14000, Halal certification)

Conversion of natural ecosystems during the reporting year

Yes

Area converted during the reporting year (hectares)

438.08

% covered by natural forests

0

Please explain

Any land clearing is in accordance with RSPO's NPP process to validate sustainable land clearing and new planting. NPP was already approved before 2018.

Forest risk commodity

Palm oil

Type of control

Scheme/Plasma smallholders

Country/Area

Indonesia

Land type

<Not Applicable>

Area (Hectares)

35452.36

% Area certified

73

Certification scheme

RSPO producer/grower certification

International Sustainability and Carbon Certification (ISCC)

Conversion of natural ecosystems during the reporting year

Please select

Area converted during the reporting year (hectares)

<Not Applicable>

% covered by natural forests

<Not Applicable>

Please explain

Details provided on land conversion cover all Cargill managed/controlled land.

F1.4

(F1.4) Provide details on the land you control and/or manage that was not used for the production of your disclosed commodity(ies) in the reporting year.

Forest risk commodity

Palm oil

Country/Area

Indonesia

Type of control

Own land

Land type

Set-aside land

Area (hectares)

16809.69

% covered by natural forests

93.05

Please explain

List types of set-aside land: HCV-HCS area, peatland area How is the set-aside land being managed to ensure it is conserved? We regularly conduct internal audits on NDPE practices in addition to scheduled RSPO audits. We also use the Zoological Society of London's (ZSL's) Spatial Monitoring and Reporting Tool (SMART) conservation software to conduct effective, real-time patrolling of the HCV and HCS areas in and around our five plantations in Indonesia. HCV-HCS assessments have also been conducted to identify set-aside areas. How will you ensure there is no deforestation when beginning future operation/expansion plans? Cargill validates that any new planting is in accordance to RSPO's New Planting Procedure (NPP) and has been approved by RSPO. The NPP requires HCS-HCV assessments to be conducted, preparation of implementation plan, verification by certification body and a public notification to be submitted on the RSPO website. Cargill also implements our Standard Operating Procedure for Sustainable Land Clearing and New Planting which must be completed before Cargill can commence land clearing and new planting.

Forest risk commodity

Palm oil

Country/Area

Indonesia

Type of control

Own land

Land type

Other land type, please specify (Unplanted land controlled or managed by the Company for potential oil palm cultivation)

Area (hectares)

1255.28

% covered by natural forests

93.05

Please explain

Not applicable. Cargill has not conducted NPP process on the unplanted land yet so the land has not been categorized.

F1.5

(F1.5) Does your organization collect production and/or consumption data for your disclosed commodity(ies)?

	Data availability/Disclosure
Timber products	<Not Applicable>
Palm oil	Consumption data available, disclosing
Cattle products	<Not Applicable>
Soy	Production data available, disclosing
Other - Rubber	<Not Applicable>
Other - Cocoa	Data available, but not disclosing
Other - Coffee	<Not Applicable>

F1.5a

(F1.5a) Disclose your production and/or consumption data.

Forest risk commodity

Palm oil

Data type

Consumption data

Volume

2595876

Metric

Metric tons

Data coverage

Partial commodity production/consumption

Please explain

Partial data provide where available and not commercially sensitive.

Forest risk commodity

Soy

Data type

Production data

Volume

0

Metric

Other, please specify (Confidential volume)

Data coverage

Partial commodity production/consumption

Please explain

Confidential volume

F1.5b

(F1.5b) For your disclosed commodity(ies), indicate the percentage of the production/consumption volume sourced by national and/or sub-national jurisdiction of origin.

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Not disclosing

% of total production/consumption volume

100

Please explain

Data considered confidential. Consumption: Not disclosed.

Forest risk commodity

Soy

Country/Area of origin

Brazil

State or equivalent jurisdiction

Not disclosing

% of total production/consumption volume

64

Please explain

Brazil represents 64% of the South America production

Forest risk commodity

Soy

Country/Area of origin

Argentina

State or equivalent jurisdiction

Not disclosing

% of total production/consumption volume

28

Please explain

Argentina represents 28% of the South America production

Forest risk commodity

Soy

Country/Area of origin

Paraguay

State or equivalent jurisdiction

Not disclosing

% of total production/consumption volume

5.7

Please explain

Paraguay represents 5.7% of the South America production

Forest risk commodity

Soy

Country/Area of origin

Bolivia (Plurinational State of)

State or equivalent jurisdiction

Not disclosing

% of total production/consumption volume

1.25

Please explain

Bolivia represents 1.25% of the South America production

F1.5c

(F1.5c) Why is your organization not disclosing production and/or consumption data for your disclosed commodity(ies)?

	Primary reason	Please explain
Timber products	<Not Applicable>	<Not Applicable>
Palm oil	<Not Applicable>	<Not Applicable>
Cattle products	<Not Applicable>	<Not Applicable>
Soy	<Not Applicable>	<Not Applicable>
Other - Rubber	<Not Applicable>	<Not Applicable>
Other - Cocoa	Data considered confidential	Cargill considers production and consumption volume data confidential and of strategic business value.
Other - Coffee	<Not Applicable>	<Not Applicable>

F1.6

(F1.6) Has your organization experienced any detrimental forests-related impacts?

No

F2. Procedures

F2.1

(F2.1) Does your organization undertake a forests-related risk assessment?

Yes, forests-related risks are assessed

F2.1a

(F2.1a) Select the options that best describe your procedures for identifying and assessing forests-related risks.

Palm oil

Value chain stage

- Direct operations
- Supply chain

Coverage

- Full

Risk assessment procedure

- Assessed in an environmental risk assessment

Frequency of assessment

- More than once a year

How far into the future are risks considered?

- 1 to 3 years

Tools and methods used

- Internal company methods
- External consultants
- Global Forest Watch Pro
- National specific tools and databases

Please explain

Cargill's Policy on Sustainable Palm Oil, released in July 2014, calls for no deforestation of high conservation value (HCV) lands or high carbon stock (HCS) areas, no development on peat, and no exploitation of land or labor rights. During the reporting period, Cargill achieved a combined average of 93 percent traceability to the mill and 48 percent traceability to plantations for the palm oil and palm kernel oil it purchases and trades. Each mill is analyzed through desktop research and satellite mapping to identify potential environmental and social risks in its supply shed. Risk indicators include forest cover loss, peat, proximity to protected areas, fire alerts and certification status. Cargill is also aiming to co-create means for identifying and monitoring labor and land rights issues. Where high-risk areas are identified, the company will carry out on-the-ground field assessments in partnership with third parties. As we progress from traceability to supply chain transformation, we will work with mills and third-party suppliers to deepen our engagement with smallholders to uphold our policy and implement best practices. Focus to date has been on it's business units that are the primary producers, traders and processors of palm and have the greatest material risk. Results are reported to the company's palm business leadership team. Future efforts may include additional food and feed supply chains to be assessed.

Soy

Value chain stage

Direct operations
Supply chain

Coverage

Full

Risk assessment procedure

Assessed in an environmental risk assessment

Frequency of assessment

More than once a year

How far into the future are risks considered?

Up to 1 year

Tools and methods used

Internal company methods
External consultants
National specific tools and databases
Other, please specify (Detailed description added below)

Please explain

As we map all the sources of our soy, we must also understand the risks of deforestation or other land conversion in local areas across our supplier network. Getting a more granular assessment helps us identify the full scope of risks involved and opportunities to mitigate them. In August 2019, we published our first risk assessment methodology, laying out how we would examine the high-risk biomes of the Amazon, Cerrado and Gran Chaco. We then set to work conducting this risk assessment across a large portion of South America at a pixel level of 30 meters. We used data from several sources – including Global Forest Watch, the University of Maryland, MapBiomias, various government agencies, and others – as well as our own proprietary data. The assessment segmented current land use across all high-risk regions, broken down into the categories of cultivated agriculture, pasture and native vegetation (including forests). It also identified areas that would be suitable for future soy cultivation based on rainfall, soil and terrain, while setting aside protected regions. It then prioritized areas that are suitable for soy and that still currently have higher concentrations of native vegetation – in other words, areas that could be at risk of deforestation or other land use conversion. We also used historical information to inform our risk assessment. We looked at areas of forest cover loss since 2008 laid side-by-side with areas where soy is currently in regular crop rotation. This analysis is helping us identify past patterns of soy growth that can be used to predict future trends. We are continuing to gather insights from this risk assessment and our supplier mapping in order to inform our next steps. We are currently identifying the locations of the farms for all of our direct suppliers and the points of procurement for our indirect suppliers in the countries that contain the high-risk biomes of the Amazon, Cerrado and Gran Chaco, as well as Uruguay, using georeferenced single points. We aim to complete this process in 2020 and have already done so for Brazil, which represents the largest share of our soy supply chain in South America. For more information about the methodology: <https://www.cargill.com/doc/1432147632035/soy-risk-assessment-2019.pdf>

Other - Cocoa

Value chain stage

Direct operations
Supply chain

Coverage

Partial

Risk assessment procedure

Assessed in an environmental risk assessment

Frequency of assessment

Annually

How far into the future are risks considered?

Up to 1 year

Tools and methods used

Internal company methods
Global Forest Watch Pro
National specific tools and databases
Jurisdictional/landscape assessment

Please explain

Cargill has outlined its plan to eliminate deforestation from its cocoa supply chain. The Protect Our Planet plan provides concrete actions the company is taking to achieve 100 percent cocoa bean traceability. The company will map its entire cocoa supply chain, using GPS and polygon farm mapping globally, to identify the exact location of the farms and accurately assess farm size. 72% of farmers in the global direct Cargill Cocoa Promise sourcing partner network are now mapped (Annual Cocoa Sustainability Report 2018/2019). We use satellite technology to determine where forests remain and where forest loss has taken place. We do this by using geo information systems (GIS) software tools, as well as geospatial data and analytical methods available in the World Resources Institute's (WRI) Global Forest Watch Pro platform. By overlaying and combining the farm maps we've collected with the geospatial satellite data, our teams can see changes in tree cover that have occurred on our cocoa suppliers' farms as well as in nearby forests and protected areas. To further analyze risk, Cargill developed a methodology for evaluating farmer organizations, district buying stations and other cocoa sourcing structures to rank their relative risk. Risk rankings take into consideration past deforestation-related impacts and potential for future deforestation. These insights help us to prioritize interventions in the areas of highest risk within each sourcing geography. Cargill Cocoa & Chocolate is currently in the process of establishing a due diligence approach to identify and address forests-related risks in the indirect supply chain.

F2.1b

(F2.1b) Which of the following issues are considered in your organization's forests-related risk assessment(s)?

Availability of forest risk commodities

Relevance & inclusion

Relevant, always included

Please explain

Availability risks are relevant and included. These risks are mitigated by working with farmers and suppliers to implement best agriculture management practices including optimizing land use and maximizing yields.

Quality of forest risk commodities

Relevance & inclusion

Relevant, always included

Please explain

At Cargill, to nourish the world in a safe, responsible and sustainable way, we believe supply chains that support global human and animal food systems must be safe, of high quality, and regulatory compliant. Because we are engaged in numerous food supply chains around the world, we are committed to working with our supply chain partners to verify our customers and consumers have access to safe, high quality, and regulatory compliant products every time, everywhere. Cocoa: Our extensive cocoa-sourcing operations enable us to buy early in the supply chain where the best quality is available. Once the beans have been checked, they are delivered to our warehouses. From there they are transported for further processing to our ultra-modern factories situated in the local cocoa producing country or in the main consuming market. Our passion for detail can be found in all our plants – whether in our new high-tech cocoa facility in Ghana or in our state-of-the-art fillings and coatings factory in Deventer, Holland. Our meticulous care and expertise allows us to preserve the sensitive properties of the cocoa bean throughout the process. This enables our customers to choose from a wide selection of products, ranging from the purity of single-origin chocolate to the complexity of intricate flavors and colors.

Impact of activity on the status of ecosystems and habitats

Relevance & inclusion

Relevant, always included

Please explain

Our prioritization approach is to identify the higher risk supply from the higher risk areas and align our actions and resources accordingly. For over a decade, Cargill has been tackling deforestation in our supply chains and delivers its commitment through time-bound policies and action plans in our cocoa, palm and soy supply chains: Cargill's Policy on Forests, Policy on Sustainable Soy – South American Origins, South American Soy Action Plan and Sustainable Palm Oil Policy and Commitments. In 2019, Cargill took bold steps to advance its commitment to protect forests and promote rural agricultural development across its supply chains, with the launch of a South America Sustainable Soy Policy, a Human Rights Commitment and an updated Forest Policy. Months later released the South American Action plan and the methodology to risk assessment. In 2019, Cargill has formed a new Land Use and Forest Protection Advisory Panel to accelerate progress across priority supply chains and provide a more systematized basis for the input of key global partners and NGOs. Cargill also committed \$30 million to source and scale innovative ideas to help end deforestation in South America. Since 2006, Cargill has partnered with industry and environmental organizations to uphold the Brazilian Soy Moratorium in the Amazon – a voluntary agreement to not purchase soy from lands in the Amazon biome that were deforested after July 2008 – that has contributed to the 80 percent decline in deforestation in the Amazon in the last decade.

Regulation

Relevance & inclusion

Relevant, always included

Please explain

Regulations are factored into Cargill's business scenario planning process generally at a country level. To understand proposed regulatory changes and their potential impact, the company's government relations team actively engages in dialogue around regulations and policies, working closely with trade associations and local and national governments on numerous policy matters.

Climate change

Relevance & inclusion

Relevant, always included

Please explain

Impact on climate and the ability of forests to sequester carbon has been included in Cargill's forest-related risks assessment and was a key driver behind the company's deforestation commitments.

Impact on water security

Relevance & inclusion

Relevant, not included

Please explain

Forest-related risks likely overlap with water security issues. While Cargill conducts a robust water-risk assessment, the specific overlap between water- and forest-related risks has not been assessed.

Tariffs or price increases

Relevance & inclusion

Not considered

Please explain

Loss of markets

Relevance & inclusion

Relevant, always included

Please explain

Cargill works closely with customers to help them meet their changing requirements with respect to forest risks. Cargill acknowledges deforestation may impact the company's operations and has built processes that may mitigate risk and create opportunities.

Brand damage related to forest risk commodities

Relevance & inclusion

Relevant, always included

Please explain

Reputational risks are considered during Cargill's operational planning. The company works to mitigate reputational risks through transparency and engagement with key stakeholders. In 2015, Cargill began discussions with World Resources Institute's Global Forest Watch to assist the company in establishing a more formal mechanism for monitoring and tracking forest loss in key supply chains. In 2016, the WRI team mapped 1,918 Cargill sourcing areas for cocoa, palm and soy across 14 countries to establish a baseline for tree cover loss as of 2014 that Cargill can use to help measure and track our progress against our implementation plans. Put together, these points encompass an area of more than 166 million hectares and include more than 119 million hectares of historical tree cover. That is why we developed a soy action plan with six elements: - Assess and plan implementation: Defining our policies, action plans and key performance indicators, and training our internal teams so they can help advance them - Understand supply chain risks: Identifying the sources of all our soybeans in South America and the risks of deforestation in those areas, through mapping and analysis - Engage supplier partners: Working closely with farmers to provide them with resources, make sure their concerns are addressed and enlist them in leading the sector's transformation - Deploy action levers: Spurring progress by building solutions that curb deforestation and provide farmers with alternatives as they seek to maintain their livelihoods - Advance transformational partnerships: Engaging with many stakeholder groups, including farmers, processors, traders, NGOs and governments, to create lasting protection for forests and native vegetation - Monitor, verify and report: Using advanced systems to confirm that the change we want to see is taking place, promote transparency and take corrective action when needed. Additionally, Cargill has formed a new Land Use and Forest Protection Advisory Panel to accelerate progress across priority supply chains and provide a more systematized basis for the input of key global partners and NGOs. The panel is designed to ensure that the strategies and resources underpinning Cargill's forest commitments are adequate to deliver positive socio-economic and environmental impact.

Corruption

Relevance & inclusion

Relevant, always included

Please explain

Cargill's Guiding Principles of "We obey the law" and "We conduct our business with integrity" are linked to Ethics and Compliance policies that cover third parties and legal conduct, anti-bribery, business gifts and entertainment, and fair competition.

Social impacts

Relevance & inclusion

Relevant, always included

Please explain

Rural economic development and livelihoods is a primary consideration in our forest protection action plans. Cargill established its grievance procedure for its palm supply chain to enable stakeholders to raise issues. Cargill is also partnering with suppliers in Guatemala, Indonesia and Malaysia to support use of the Ulula worker voice system in our supply chains to improve workers' ability to provide feedback and help suppliers appropriately manage concerns or risks raised by workers. Additionally, the company is engaged in many multi-stakeholder roundtables, associations and initiatives that provide mechanisms to engage stakeholders on questions and concerns with respect to forest risk commodities. In 2019, we launched Cargill Commitment on Human Rights. Cargill does not tolerate the use of illegal, abusive or forced labor in any of our operations anywhere in the world, and we abide by all of the laws in the countries where we operate. We also partner with suppliers to positively influence labor practices on palm oil plantations owned by our suppliers. We believe it is essential that all members of the supply chain work together with governments, local communities and NGOs to find practical solutions to labor issues while fostering responsible economic development. We support the work being done to address labor and human rights issues by governments and organizations, including the International Labor Organization and the United Nations Children's Fund (UNICEF), RSPO's Human Rights Working Group and Earthworm (formerly The Forest Trust) "No Exploitation" standard. For the soybean chain in South America this procedure was improved in 2019, in alignment with our Soy Action Plan. Besides that, one of the commitments established on Cargill Policy on Sustainable Soy - South American Origins is: Respect and uphold the rights of workers, indigenous peoples and communities.

Other, please specify

Relevance & inclusion

Not considered

Please explain

F2.1c

(F2.1c) Which of the following stakeholders are considered in your organization's forests-related risk assessments?

Customers

Relevance & inclusion

Relevant, always included

Please explain

Why stakeholders are included in the risk assessment Cargill aims to be the most trusted source of sustainable products and services to our customers. Cargill's strategic management is directly linked to its purpose of nourishing our world in a safe, responsible and sustainable manner. To achieve its mission, the company has developed the Game Plan for Success (GPS), a strategic direction plan that guides it in your highest aspirations (purpose and vision), decision making (values), the scope of what it offers to customers (customer value proposition), and the presentation of means to achieving results faster (accelerators). In the GPS, Cargill focuses collectively on strategies that are able to deliver more results in achieving performance goals and objectives. Each year, priorities are set to drive the business and the roles, driving progress in what matters most to the company. It now operates with a greater emphasis on the customer. We do a lot of things in support of our customers – from building complex global supply chains to ensuring food safety to helping manage price risks. That's our expertise. We have an opportunity to bring the best of Cargill to our customers, and to support their growth and ours along the way. Our customer value proposition sums up both what we already do well and what we aspire to do better. It defines how we will have the biggest impact on our customers' success: A world of expertise delivered locally, quickly and reliably – creating value together with our customers. Palm: Cargill updates our customers regularly on our sustainability progress, including hosting site visits at our plantations and 3rd-party suppliers' plantations to share best practices. Cargill also participates in initiatives and working groups which includes customers as participants. In 2019, Cargill initiated the formation of the Palm Oil Collaboration Group with partners to trial the NDPE Implementation Framework used by companies to track progress in delivering NDPE commitments across their volumes. Cargill also partners in landscape projects with customers in priority areas, such as the Siak-Pelalawan landscape initiative, to identify and address common environmental, land and labor issues.

Employees

Relevance & inclusion

Relevant, sometimes included

Please explain

Our entire commercial team is trained in the procedures and is aware of all the steps taken by the company related to the topic.

Investors

Relevance & inclusion

Relevant, always included

Please explain

While Cargill is privately held, we do consider Cargill family shareholders, lenders, corporate bond holders and ESG rating agencies as relevant stakeholders in our forest-related risk assessment.

Local communities

Relevance & inclusion

Relevant, always included

Please explain

Cargill is committed to the communities where we live and work. We invest in, engage with and respect cultures while promoting sustainable and responsible economic development to improve living standards and promote stable communities. In Brazil we enrich our communities through Fundação Cargill (Cargill Foundation). With the mission of promoting safe, sustainable and affordable food, the Fundação Cargill invests in the communities where the company operates. One of its forms of action is through the Fundação Cargill call for proposals, through which the institution supports the development of social projects carried out by civil society organizations in line with its mission. The Foundation is also responsible for the Alimentação em Foco ("Food in Focus") Award, an initiative implemented in partnership with Enactus Brazil to support projects developed by university students in the country, who act locally and drive the social transformation of their communities. In addition, in order to strengthen the cause of food and disseminate knowledge and information, the Foundation makes its website www.alimentacaoemfoco.org.br available and has a corporate volunteer program called Semeando Futuro ("Sowing the Future"), which encourages employees to act positively on their communities. Palm: Cargill's Sustainable Policy on Palm Oil calls for the respect of indigenous peoples and local communities. Cargill expects the process of Free Prior Informed Consent to be obtained before commencement of activities, and expects our suppliers to do the same. We also strongly encourage suppliers to conduct Social Impact Assessments if not already completed for RSPO or national sustainability certification (Malaysia Sustainable Palm Oil). Cargill also regularly provides local communities NDPE training and socialization to verify they understand our policy and their role in adhering to our NDPE commitments.

NGOs

Relevance & inclusion

Relevant, always included

Please explain

Cargill recognizes the complex social, economic and environmental issues facing our world. Due to the complexity of these issues, we form partnerships with organizations to provide meaningful impact in the nutrition and health of those in our communities; foster sustainable economic development; and promote responsible business practices in our supply chains. We contribute our knowledge, skills, financial and technical support to our partnerships and believe our contributions can help deliver long-term solutions to our local communities as well as globally. Cargill has formed a new Land Use and Forest Protection Advisory Panel to accelerate progress across priority supply chains and provide a more systematized basis for the input of key global partners and NGOs. The panel is designed to ensure that the strategies and resources underpinning Cargill's forest commitments are adequate to deliver positive socio-economic and environmental impact. Members will bring cross-sector insights to Cargill, accelerating the company's ambitions and supporting continuous improvement. The panel will build on the company's existing work with trusted advisors and thought leaders, which resulted in a revised Global Forest Policy and accompanying Land Use Operating Guidelines in the past two years, both of which are now being actively implemented across the company's businesses.

Other forest risk commodity users/producers at a local level

Relevance & inclusion

Relevant, sometimes included

Please explain

We have been in dialogue with associations of rural producers to find inclusive solutions to eliminate the gap in the soy supply chain, such as the partnership with AIBA in Western Bahia, a region that was defined as one of the highest risk for the company.

Regulators

Relevance & inclusion

Relevant, always included

Please explain

Cargill's Guiding Principles of "We obey the law" and "We conduct our business with integrity" are linked to Ethics and Compliance policies that cover third parties and legal conduct, anti-bribery, business gifts and entertainment, and fair competition.

Suppliers

Relevance & inclusion

Relevant, always included

Please explain

We are committed to working in partnership with our suppliers, customers, NGOs and governments to innovate and scale real solutions. Cargill has been developing supplier engagement actions in all priorities supply chains. Cargill works closely with farmers all around the world, buying their crops and offering them risk management services. We also provide millions of them with training on good agricultural practices to raise their yields and incomes, and work with them to advance the environmental, social and economic dimensions of sustainability. Palm: Suppliers must be operating in compliance with our NDPE policy commitments and our Supplier Code of Conduct. Cargill adopts a risk-calibrated approach as part of our traceability efforts in 2019 is helping us to prioritize the most important areas and suppliers for action. For example, each palm mill is analyzed through desktop research and satellite mapping to identify potential environmental and social risks in its supply shed. Risk indicators include forest cover loss, peat, proximity to protected areas, fire alerts and certification status. Cargill is also aiming to co-create means for identifying and monitoring labor and land rights issues. Where high-risk areas are identified, the company will carry out on-the-ground field assessments in partnership with third parties to identify gaps in the mills' performance, provide support to develop continuous improvement plans which address those gaps, and verify compliance. Sustainability engagement is not limited to direct suppliers but also extends to indirect suppliers to understand indirect suppliers' risks and traceability, supporting them in satellite monitoring for potential deforestation. Cargill also offers supports on action plans by direct suppliers which get rolled out to indirect suppliers. Soy: In Brazil, our commercial teams maintain close relationships with the farmers who supply us soy. We also help them grow their soy in a sustainable way by offering training and other support from partners like Instituto BioSistêmico (IBS). These extension agents visit farms regularly to share practical applications of sustainability know-how. They also provide assistance digitally through WhatsApp. Cargill trained more than 2,600 farmers in Brazil on sustainable agricultural practices and certification programs.

Other stakeholders, please specify

Relevance & inclusion

Not considered

Please explain

F3. Risks and opportunities

F3.1

(F3.1) Have you identified any inherent forests-related risks with the potential to have a substantive financial or strategic impact on your business?

	Risk identified?
Timber products	<Not Applicable>
Palm oil	Yes
Cattle products	<Not Applicable>
Soy	Yes
Other - Rubber	<Not Applicable>
Other - Cocoa	Yes
Other - Coffee	<Not Applicable>

F3.1a

(F3.1a) How does your organization define substantive financial or strategic impact on your business?

- i) **A definition of substantive financial or strategic impact is given:** Cargill's corporate compliance is led by a board-level audit committee, an Executive Team committee, and a Global Ethics & Compliance Office (GECO) function. GECO coordinates and manages the compliance risk assessment process, which is deployed at Group level. Part of this process is to classify risks based upon three criteria: risk likelihood, risk impact, and control effectiveness.
- ii) **The measure(s), metric(s) or indicator(s) used to identify substantive change:** risk likelihood, risk impact, and control effectiveness.
- iii) **The threshold or amount of change in the metric/measure/indicator which indicates substantive change:** Financial impact: "High" impact \$25 million USD or more. An issue in the middle range would be one that could potentially impact \$1-24 million USD, and issues that could impact less than \$1 million USD will be categorised as "Low" impact. Likelihood of occurrence within a given amount of time: High = likely to occur in less than three (3) years. Medium = likely to occur in 3-5 years. Low = likely to occur in 5-10 years. Issues that appear to be more than about 10 years are classified as emerging trends.
- iv) **Whether the definition applies to direct operations, or supply chain, or both:** The definition applies to impacts on direct operations and supply chain.

F3.1b

(F3.1b) For your disclosed forest risk commodity(ies), provide details of risks identified with the potential to have a substantive financial or strategic impact on your business, and your response to those risks.

Forest risk commodity

Soy

Type of risk

Reputational and markets

Geographical scale

Global

Where in your value chain does the risk driver occur?

Direct operation
Supply chain

Primary risk driver

Shifts in consumer preference

Primary potential impact

Reduced demand for products and services

Company-specific description

Cargill's role in the soy supply chain comes with significant responsibility, and we are keenly aware of the need to deliver customer solutions in a safe, responsible and sustainable way. Not meeting these expectations could impact demand for our products.

Timeframe

1-3 years

Magnitude of potential impact

Medium

Likelihood

Likely

Are you able to provide a potential financial impact figure?

No, we do not have this figure

Potential financial impact (currency)

<Not Applicable>

Potential financial impact figure - minimum (currency)

<Not Applicable>

Potential financial impact figure - maximum (currency)

<Not Applicable>

Explanation of financial

Cargill considers this information confidential

Primary response to risk

Other, please specify (Sustainable Sourcing Policies, time-bound plans and engagement in multi-stakeholder initiatives.)

Description of response

Our Soy Action Plan is an important component of the comprehensive actions we are taking across our supply chains to increase transparency and advance our sustainability commitments. Progress during reporting period: Cargill mapped 100% of its Brazilian supply chain with georeferenced single points – completing the project six months ahead of schedule. Georeferenced single points allow the company to identify the locations of its direct suppliers and points of procurement for our indirect suppliers, a critical step toward effectively protecting forests and native vegetation. For the first time, Cargill calculated the estimated share of its soy in Brazil grown on land that is deforestation- and conversion-free, 95.68%, by analyzing data from external sources about both crop growth and changes in land use, using 2008 (Forest Code) as a reference point. Cargill expanded its direct engagement with farmers in Brazil, including the launch of a new partnership with the largest farmer association in the state of Bahia. The company continued to grow its Sustainably Sourced and Supplied certification program in Brazil and Paraguay, providing a large market for soybeans grown through verified sustainable methods. Farmers who commit to this program pledge to produce their crops by using the best agricultural practices, protecting worker welfare, and managing greenhouse gas emissions under a continuous improvement process.

Cost of response

0

Explanation of cost of response

Cargill considers this information confidential.

Forest risk commodity

Soy

Type of risk

Regulatory

Geographical scale

Country

Where in your value chain does the risk driver occur?

Supply chain

Primary risk driver

Non-compliance with national legislation

Primary potential impact

Supply chain disruption

Company-specific description

Government agencies in Brazil play a key role in protecting native vegetation. The country's 2012 Forest Code established mechanisms for addressing illegal deforestation and stipulated that between 20% and 80% of native vegetation on agricultural properties must be preserved, depending on the region. Meanwhile, the federal government maintains lists of farming operations accused of illegal deforestation and slave labor. As a responsible company, we expect our global Supplier Partners to share our commitment to following the law. Non-compliance and with these regulations and our Supplier code-of-conduct is a risk to our supply chain.

Timeframe

1-3 years

Magnitude of potential impact

Medium-low

Likelihood

Unlikely

Are you able to provide a potential financial impact figure?

No, we do not have this figure

Potential financial impact (currency)

<Not Applicable>

Potential financial impact figure - minimum (currency)

<Not Applicable>

Potential financial impact figure - maximum (currency)

<Not Applicable>

Explanation of financial

Cargill does not do business with producers who violate the Brazilian Forest Code, and we have internal processes and controls to prevent acquisitions from embargoed areas and guarantee the sale of products originated from properties that are in compliance with Brazilian law.

Primary response to risk

Other, please specify (Sustainable Sourcing Policies, time-bound plans and engagement in multi-stakeholder initiatives.)

Description of response

Through participation in the Soy Working Group (GTS) and Cerrado Working Group (GTC), Cargill continues to focus on reducing deforestation and ensuring sustainable soy production in Brazil. This includes significant work with farmers to help them comply with the Brazilian Forest Code and use of responsible agricultural practices. Cargill's Policy on Sustainable Soy – South American Origins 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. Cargill's South American 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. 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. If cases of illegal activity are confirmed, we take immediate action in line with our forest and sustainable soy policies, global Supplier Code of Conduct and soy grievance process.

Cost of response

0

Explanation of cost of response

Cargill considers this information confidential

Forest risk commodity

Other - Cocoa

Type of risk

Regulatory

Geographical scale

Country

Where in your value chain does the risk driver occur?

Supply chain

Primary risk driver

Poor enforcement of regulation

Primary potential impact

Supply chain disruption

Company-specific description

i) Company-specific details about how the impact identified will affect their own operations or in their supply chain ii) The response strategy is implemented OR if not yet implemented the timeframe for when the response strategy is expected to be implemented is included: iii) A description of how effective the response has been/is expected to be in preventing the inherent risk driver reoccurring:

Timeframe

1-3 years

Magnitude of potential impact

Medium

Likelihood

About as likely as not

Are you able to provide a potential financial impact figure?

No, we do not have this figure

Potential financial impact (currency)

<Not Applicable>

Potential financial impact figure - minimum (currency)

<Not Applicable>

Potential financial impact figure - maximum (currency)

<Not Applicable>

Explanation of financial

Cargill considers this information confidential

Primary response to risk

Engagement in multi-stakeholder initiatives

Description of response

Cargill co-founded the Cocoa for Forest Initiative for Ghana and Cote d'Ivoire. CFI brings together government, private sector, including farmer and farmers' organizations, national and international civil society organizations, development partners, and other stakeholders in Côte d'Ivoire, Ghana and at the global level. Cargill has published an Action Plan that sets out concrete activities to protect and restore forests, grow more cocoa on less land, and engage with communities. We are collaborating with industry partners, government officials and NGOs to design, develop and implement practical solutions.

Cost of response

0

Explanation of cost of response

Cargill considers this information confidential

F3.2

(F3.2) Have you identified any forests-related opportunities with the potential to have a substantive financial or strategic impact on your business?

	Have you identified opportunities?
Timber products	<Not Applicable>
Palm oil	Yes
Cattle products	<Not Applicable>
Soy	Yes
Other - Rubber	<Not Applicable>
Other - Cocoa	Yes
Other - Coffee	<Not Applicable>

F3.2a

(F3.2a) For your selected forest risk commodity(ies), provide details of the identified opportunities with the potential to have a substantive financial or strategic impact on your business.

Forest risk commodity

Palm oil

Type of opportunity

Markets

Where in your value chain does the opportunity occur?

Direct operation

Supply chain

Primary forests-related opportunity

Expansion into new markets

Company-specific description & strategy to realize opportunity

i) Company specific explanation of the opportunity chosen: Cargill offers traceable and sustainably sourced palm oil to some customers. ii) Explanation of the strategy to realize the opportunity: In 2019, Cargill achieved 93% traceability to mills and 48% traceability to plantations, providing good visibility into our supply chain. Using GPS coordinates and concession shape files, we can identify and visualize the potential risk of deforestation around the mills from which we purchase palm oil. We upload this data to a geospatial information system to monitor changes using satellites and radar imageries. Cargill also adopts a risk-calibrated approach to collect traceability data and prioritize follow-up engagement. This is practical for tracing and understanding risk of outside third-party fruit sources. Central to this approach is tracing fruit back to aggregations of producers, defined as the smallest administrative unit in a region, such as a village or municipality.

Estimated timeframe for realization

1-3 years

Magnitude of potential impact

Low

Likelihood

Likely

Are you able to provide a potential financial impact figure?

No, we do not have this figure

Potential financial impact figure (currency)

<Not Applicable>

Potential financial impact figure – minimum (currency)

<Not Applicable>

Potential financial impact figure – maximum (currency)

<Not Applicable>

Explanation of financial impact figure

Cargill considers this information confidential

Forest risk commodity

Soy

Type of opportunity

Markets

Where in your value chain does the opportunity occur?

Direct operation

Supply chain

Primary forests-related opportunity

Expansion into new markets

Company-specific description & strategy to realize opportunity

Cargill's role in the soy supply chain comes with significant responsibility, and we are keenly aware of the need to deliver customer solutions in a safe, responsible and sustainable way. Providing products that meet and exceed these expectations is an opportunity for Cargill. We are taking the following actions to meet these expectations and realize the opportunity: Cargill will transform our supply chain to be deforestation free while protecting native vegetation Cargill will promote responsible production, which benefits farmers and surrounding communities Cargill respect and uphold the rights of workers, indigenous peoples and communities Cargill will uphold high standards of transparency through reporting of key metrics, progress and grievances Example : Since launching in 2010, our 3S program has sourced soy from farms that are certified to meet exceptionally high standards for agricultural practices, labor and environmental impact. About 200 farmers in Brazil participate in the program today, which is independently verified and is focused on continuous improvement each year. Farmers get technical assistance to enhance their operations from experts at organizations like IBS. Because 3S is deforestation- and conversion-free, it aligns with European Union standards and programs such as RTRS, ISCC, FEFAC and others. This makes it ideal for our European customers who have a strong interest in soy that addresses several dimensions of sustainability. Consumers in Brazil can now participate in the 3S story, too. Our Liza® Origens brand of cooking oil is made with soy from our 3S program. Available at retail locations, this brand helps consumers know more about the type of farm that produced it. We also started the process of deploying our 3S program in Paraguay, beginning by training our commercial teams. We rolled out a 3S pilot at five farms in October, with the aim of expanding 3S to 200 farming operations in the country for the 2020 crop.

Estimated timeframe for realization

1-3 years

Magnitude of potential impact

High

Likelihood

Likely

Are you able to provide a potential financial impact figure?

No, we do not have this figure

Potential financial impact figure (currency)

<Not Applicable>

Potential financial impact figure – minimum (currency)

<Not Applicable>

Potential financial impact figure – maximum (currency)

<Not Applicable>

Explanation of financial impact figure

Cargill considers this information confidential

Forest risk commodity

Other - Cocoa

Type of opportunity

Markets

Where in your value chain does the opportunity occur?

Direct operation

Supply chain

Primary forests-related opportunity

Increased availability of products with reduced environmental impact (other than certified products)

Company-specific description & strategy to realize opportunity

Product sustainability is becoming an increasing driver for consumers who see their product choices as a reflection of who they are and what they value. Consumers want to see the issues they care about acknowledged in the brands they buy. Providing products that meet and exceed these expectations is an opportunity for Cargill. We believe that a prerequisite for making real progress on sustainability is ensuring maximum transparency and traceability across the cocoa supply chain. The proliferation of innovative and cost-effective technological solutions is accelerating traceability, real-time data collection and financial transparency. It also allows for greater transparency on how cocoa is grown and sourced from farmers. As the quality of this information improves, consumers have greater confidence, and demand for sustainable cocoa goes up. This cycle will help hold everyone to a higher standard and move our industry forward. Cargill intends to achieve 100 percent cocoa bean traceability and is integrating environmental protection projects into its Cocoa Promise program in collaboration with customers. The Cargill Cocoa Promise is our commitment to improving the lives of cocoa farmers and their communities. At the same time, it will help us to secure a long-term supply of cocoa for our business.

Estimated timeframe for realization

>6 years

Magnitude of potential impact

Medium

Likelihood

More likely than not

Are you able to provide a potential financial impact figure?

No, we do not have this figure

Potential financial impact figure (currency)

<Not Applicable>

Potential financial impact figure – minimum (currency)

<Not Applicable>

Potential financial impact figure – maximum (currency)

<Not Applicable>

Explanation of financial impact figure

Cargill considers this information confidential

F4. Governance

F4.1

(F4.1) Is there board-level oversight of forests-related issues within your organization?

Yes

F4.1a

(F4.1a) Identify the position(s) of the individual(s) (do not include any names) on the board with responsibility for forests-related issues.

Position of individual	Please explain
Board Chair	Our CEO and Chairman is the owner of Cargill's Policy on Forests. Progress toward forest and land-use commitments is reviewed by CEO and Chairman on a quarterly basis and reported to the board.
Chief Executive Officer (CEO)	Our CEO and Chairman is the owner of Cargill's Policy on Forests. Progress toward forest and land-use commitments is reviewed by CEO and Chairman on a quarterly basis and reported to the board.

F4.1b

(F4.1b) Provide further details on the board's oversight of forests-related issues.

	Frequency that forests-related issues are a scheduled agenda item	Governance mechanisms into which forests-related issues are integrated	Please explain
Row 1	Scheduled - some meetings	Monitoring implementation and performance Reviewing and guiding annual budgets Reviewing and guiding business plans Reviewing and guiding corporate responsibility strategy Reviewing and guiding major plans of action Reviewing and guiding risk management policies Reviewing and guiding strategy Setting performance objectives	Description of how the governance mechanisms selected contribute to the board's oversight of forest issues: The board members mentioned above have provided input and support into our expanded efforts around land use. This included the approval of a \$30 million fund to accelerate new ideas and collaborative solutions that will help improve the soy industry's efforts to end deforestation in Brazil.

F4.2

(F4.2) Provide the highest management-level position(s) or committee(s) with responsibility for forests-related issues (do not include the names of individuals).

Name of the position(s) and/or committee(s)	Responsibility	Frequency of reporting to the board on forests-related issues	Please explain
Chief Sustainability Officer (CSO)	Both assessing and managing forests-related risks and opportunities	Quarterly	ii) A description of the individual's/committee's position in the corporate structure: Cargill's Chief Sustainability Officer and Corporate Senior Vice President is a member of the Executive Leadership Team and leads the company's integrated supply chain, research and development, and sustainability practices. She also oversees Cargill's communications, brand and corporate responsibility functions. iii) A description of the nature of the report to the board referred to in "Frequency of reporting to the board on forests-related issues": Progress toward forest and land-use commitments is reported to the board on a quarterly basis iv) Details on the forest-related responsibilities of the individual/committee selected: Monitors progress on the company's sustainability efforts, including our commitment to ending deforestation in our supply chains.

F4.3

(F4.3) Do you provide incentives to C-suite employees or board members for the management of forests-related issues?

	Provide incentives for management of forests-related issues	Comment
Row 1	Yes	

F4.3a

(F4.3a) What incentives are provided to C-Suite employees or board members for the management of forests-related issues (do not include the names of individuals)?

	Role(s) entitled to incentive?	Performance indicator	Please explain
Monetary reward	No one is entitled to these incentives	No indicator for incentivized performance	
Non-monetary reward	Chief Executive Officer (CEO) Chief Financial Officer (CFO) Chief Sustainability Officer (CSO)	Achievement of commitments and targets	Cargill's strategic direction, the Game Plan for Success (GPS) brings Cargill together around a common set of goals to advance both our purpose and performance in an integrated and balanced way. The quarterly integrated performance scorecard includes specific indicators related to progress toward forest and land-use commitments.

F4.4

(F4.4) Did your organization include information about its response to forests-related risks in its most recent mainstream financial report?

Yes (you may attach the report – this is optional)

F4.5

(F4.5) Does your organization have a policy that includes forests-related issues?

Yes, we have a documented forests policy that is publicly available

F4.5a

(F4.5a) Select the options to describe the scope and content of your policy.

	Scope	Content	Please explain
Row 1	Company-wide	Commitment to eliminate deforestation Commitment to protect rights and livelihoods of local communities Commitments beyond regulatory compliance Commitment to transparency Commitment to stakeholder awareness and engagement Commitment to align with the SDGs Recognition of the overall importance of forests and other natural ecosystems Recognition of potential business impact on forests and other natural habitats Description of forests-related performance standards for direct operations	We are delivering on our commitment through time-bound policies and action plans in our cocoa, palm and soy supply chains. Recognizing both the size and complexity of our global supply chains and the importance of taking a rigorous approach across all our businesses, we have established a set of internal land use operating guidelines. These provide the base foundation and direction required by individual Cargill businesses to deliver on this corporate deforestation-free commitment and serve as an addition to existing policies and procedures held at the corporate and individual supply chain levels. The guidelines are also designed as a platform from which each business can accelerate its own progress against the deforestation commitment, e.g. in our Palm business we are committed to a 2020 target. These internal guidelines are supported by supply chain working teams for each supply chain risk or origination biome comprising sustainability, commercial and corporate affairs employees from related areas of the company. Additional support and guidance are provided by Cargill's Sustainability Hub and overseen by our executive level sustainability advisory process.

F4.5b

(F4.5b) Do you have commodity specific sustainability policy(ies)? If yes, select the options that best describe their scope and content.

	Do you have a commodity specific sustainability policy?	Scope	Content	Please explain
Timber products	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>

	Do you have a commodity specific sustainability policy?	Scope	Content	Please explain
Palm oil	Yes	Selected facilities, businesses or geographies only	<p>Commitment to eliminate deforestation</p> <p>Commitment to protect rights and livelihoods of local communities</p> <p>Commitments beyond regulatory compliance</p> <p>Commitment to transparency</p> <p>Commitment to stakeholder awareness and engagement</p> <p>Commitment to align with the SDGs</p> <p>Recognition of the overall importance of forests and other natural ecosystems</p> <p>Recognition of potential business impact on forests and other natural ecosystems</p> <p>Description of forest risk commodities, parts of the business, and stages of value-chain covered by the policy</p> <p>List of timebound commitments and targets</p> <p>Description of forests-related performance standards for direct operations</p> <p>Description of forests-related standards for procurement</p>	<p>Cargill Policy on Sustainable Palm Oil dated March In 2019 (updated from July 2014). Cargill's commitments to producing and sourcing palm oil in an ethical, environmentally sustainable and socially responsible manner are embodied in our responsible production requirements that aim to deliver palm oil that is produced in accordance with "No Deforestation, No Peat and No Exploitation" (NDPE) practices. Our time-bound roadmap outlines the four pillars that have been the cornerstones of our Palm Policy, guiding its implementation and delivering impact: traceability, supplier engagement, sustainable plantations and smallholder programs.</p>
Cattle products	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Soy	Yes	Selected facilities, businesses or geographies only	<p>Commitment to eliminate deforestation</p> <p>Commitment to protect rights and livelihoods of local communities</p> <p>Commitments beyond regulatory compliance</p> <p>Commitment to transparency</p> <p>Commitment to stakeholder awareness and engagement</p> <p>Commitment to align with the SDGs</p> <p>Recognition of the overall importance of forests and other natural ecosystems</p> <p>Recognition of potential business impact on forests and other natural ecosystems</p> <p>Description of forest risk commodities, parts of the business, and stages of value-chain covered by the policy</p> <p>Description of forests-related standards for procurement</p>	<p>Our Policy on Sustainable Soy allows for both sustainability values and agricultural development to simultaneously thrive. Cargill sits in a unique position between growers and consumers. We commit to using this position to take practical measures to help protect forests, mitigate agriculture as a contributor to deforestation, provide farmers with access to markets, and promote rural economic development.</p>
Other - Rubber	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>

	Do you have a commodity specific sustainability policy?	Scope	Content	Please explain
Other - Cocoa	Yes	Company-wide	Commitment to eliminate deforestation Commitment to protect rights and livelihoods of local communities Commitments beyond regulatory compliance Commitment to transparency Commitment to stakeholder awareness and engagement Commitment to align with the SDGs Recognition of the overall importance of forests and other natural ecosystems Recognition of potential business impact on forests and other natural ecosystems List of timebound commitments and targets Description of forests-related performance standards for direct operations	Cargill has outlined its plan to eliminate deforestation from its cocoa supply chain. The Protect Our Planet plan provides concrete actions the company is taking to achieve 100 percent cocoa bean traceability and includes a commitment of "no further conversion" of any forest land in Ghana and Ivory Coast for cocoa production. It also expands the company's forest efforts to five origin countries (Brazil, Indonesia, Cameroon, Ivory Coast and Ghana) as well as the indirect cocoa supply chain, while securing the future livelihoods and resilience of smallholder cocoa farmers.
Other - Coffee	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>

F4.6

(F4.6) Has your organization made a public commitment to reduce or remove deforestation and/or forest degradation from its direct operations and/or supply chain?

Yes

F4.6a

(F4.6a) Has your organization endorsed any of the following initiatives as part of its public commitment to reduce or remove deforestation and/or forest degradation?

New York Declaration on Forests

Soy Moratorium

Other, please specify (Tropical Forest Alliance, Cerrado Working Group (GTC), Soft Commodities Forum (SCF), Protocolo Verde de Grãos do Pará, Cocoa & Forest Initiative Joint Frameworks for Action Ghana and Cote d'Ivoire, CocoaAction,)

F4.6b

(F4.6b) Provide details on your public commitment(s), including the description of specific criteria, coverage, and actions.

Forest risk commodity

Palm oil

Criteria

Zero gross deforestation/ no deforestation
 No new development on peat regardless of depth
 Best management practices for existing cultivation on peat
 Restoration and compensation to address past deforestation and conversion
 Avoidance of negative impacts on threatened and protected species and habitats
 No land clearance by burning or clearcutting
 No conversion of High Conservation Value areas
 No conversion of High Carbon Stock forests
 Secure Free, Prior and Informed Consent (FPIC) of indigenous people and local communities
 Operations are in accordance with the UN Declaration on the Rights of Indigenous Peoples
 Remediate any adverse impacts on indigenous people and local communities
 Adoption of the UN International Labour Organization principles
 Resolution of complaints and conflicts through an open, transparent and consultative process
 Facilitate the inclusion of smallholders into the supply chain
 No sourcing of illegally produced and/or traded forest risk commodities
 No sourcing of forest risk commodities from unknown/controversial sources
 Recognition of legal and customary land tenure rights

Operational coverage

Direct operations and supply chain

% of total production/ consumption covered by commitment

100%

Cutoff date

2016

Commitment target date

2020

Please explain

Cargill Policy on Sustainable Palm Oil dated March In 2019 (updated from July 2014) Cargill achieved a combined average of 93 percent traceability to the mill and 48 traceability to the plantation for the palm oil and palm kernel oil it purchases and trades, and has a goal of a 100 percent transparent, traceable and sustainable palm supply chain by 2020. Cargill has been deeply involved in the RSPO Working Groups, Sustainable Landscapes Working Group and the HCS Approach. Our policy commits to: • Commitment to the High Carbon Stock Approach (HCSA) • Strengthened standards on social and human rights protection of workers, indigenous peoples and local communities • Zero tolerance to retaliation and intimidation • Dedicated section to smallholder inclusion • High standards of transparency and monitoring

Forest risk commodity

Soy

Criteria

No conversion of natural ecosystems
Zero gross deforestation/ no deforestation
No sourcing of illegally produced and/or traded forest risk commodities
No sourcing of forest risk commodities from unknown/controversial sources

Operational coverage

Direct operations and supply chain

% of total production/ consumption covered by commitment

100%

Cutoff date

2008

Commitment target date

2026-2030

Please explain

In 2006 Cargill supported the Soy Moratorium committing the company not to purchase soy from lands that have been deforested in the Amazon biome. The Soy Moratorium was adapted to align with Brazil's new Forest Code and in May 2016 was renewed indefinitely - until it is no longer necessary. In Brazil's Pará state, Cargill only purchases from those farms that have obtained a CAR (Rural Environmental Registry). In 2014, Cargill endorsed the New York Declaration on Forests, a global commitment to end deforestation worldwide. In 2015, Cargill released its Policy on Forests, which was revised earlier this year. It sets principles to guide Cargill businesses in addressing deforestation risk in their supply chains. We launched the Policy on Sustainable Soy - South American Origin this year. The Policy highlights 4 key commitments: Cargill commits to a transparent and sustainable South American soy supply chain that: 1. Transforms our supply chain to be deforestation free while protecting native vegetation beyond forests. 2. Promotes responsible production, which benefits farmers and surrounding communities. 3. Respects and upholds the rights of workers, indigenous peoples and communities. 4. Upholds high standards of transparency through reporting of key metrics, progress and grievances.

Forest risk commodity

Other - Cocoa

Criteria

Other, please specify (No deforestation)

Operational coverage

Supply chain

% of total production/ consumption covered by commitment

100%

Cutoff date

Please select

Commitment target date

2026-2030

Please explain

Cargill Cocoa & Chocolate introduced our five sustainability Goals in 2017, cementing our commitments to delivering our contribution to the SDGs and further improving farmer and community livelihood. As outlined in our Protect our Planet Strategic Action Plan we will promote environmental best practices in our business and across our supply chain. We set our targets of reaching zero deforestation in the cocoa supply chain by 2030. The Protect Our Planet plan provides concrete actions the company is taking to achieve 100 percent cocoa bean traceability and includes a commitment of "no further conversion" of any forest land in Ghana and Ivory Coast for cocoa production. It also expands the company's forest efforts to five origin countries (Brazil, Indonesia, Cameroon, Ivory Coast and Ghana) as well as the indirect cocoa supply chain, while securing the future livelihoods and resilience of smallholder cocoa farmers

F5. Business strategy

F5.1

(F5.1) Are forests-related issues integrated into any aspects of your long-term strategic business plan, and if so how?

	Are forests-related issues integrated?	Long-term time horizon (years)	Please explain
Long-term business objectives	Yes, forests-related issues are integrated	11-15	Example of how forests-related issues are integrated into the plan: In 2014, Cargill endorsed the New York Declaration on Forests, the only global agricultural commodities company to do so. The Declaration calls for collective efforts to at least halve the rate of loss of natural forests globally by 2020 and strive to end natural forest loss by 2030. We remain committed to our overall goal to be deforestation free by 2030 in line with NY Declaration—but we won't wait until 2030 to deliver, we're taking action today. In 2018, Cargill inaugurated the Sustainability Hub, which is a centre of excellence to accelerate sustainability priorities across Cargill. The groundwork of mapping and prioritising high-risk supply chains has been completed, focusing efforts and investment on the three key supply chains of cocoa, palm and soy. Recognising the individual characteristics of each supply chain, we have continued to advance the following business objectives on each commodity: Fully traceable cocoa supply chain by 2020 (already achieved in Ghana) Fully traceable palm (currently at 93% traceable to the mill) Fully traceable soy by 2030. Cargill believes that forests and farming can and must coexist in order to sustain the health of people and our planet. In addition to the goals mentioned above, we are fully committed to supporting farmer livelihoods, and promoting responsible production, which benefits farmers and surrounding communities. Examples of this include: - Training more than 250,000 farmers in good agricultural practices across the three supply chains - Managing the 3S training program in Brazil, which helps farmers protect natural resources in their own operations—includes training on measuring and improving performance - One million community members benefiting from the Cargill Cocoa Promise
Strategy for long-term objectives	Yes, forests-related issues are integrated	11-15	Example of how forests-related issues are integrated into the plan: Sustainability is written into Cargill's purpose to nourish the world in a safe and responsible way. In addition, it guides our vision to be the most trusted partners in agriculture, food and nutrition. As such, it is embedded in Cargill's corporate strategy, Our Game Plan for Success, and underpins our customer value proposition and three value-generating accelerators: innovate what matters, unlock Cargill's full potential, and Grow markets and margins. In specific relation to Forests we are committed to transforming our agricultural supply chains to be deforestation-free, through prioritized supply chain policies and time-bound action plans. Key examples include: Updated our Forest Policy—with specific focus on time-bound action plans, KPIs and greater consistency and measurability of progress. Introduced Sustainable Soy Policy and Action Plan, which joins our sustainable palm and cocoa policies and action plans to complete our sustainable supply chain approach. Launched Human Rights Commitment, protecting workers and indigenous people. Asset sighting, location, size, and feeder area are assessed based-on land use impact and risk and incorporated into our strategy for long-term objectives.
Financial planning	Yes, forests-related issues are integrated	5-10	Example of how forests-related issues are integrated into the plan: In specific relation to forests, financial planning includes the resources necessary to meet Cargill's objectives and strategic goals as mentioned above. This includes the launch of a Future Forest Fund to accelerate the development and implementation of economically viable alternatives to protect forests and native vegetation. The launch of the fund was also a call to action and invitation for others in Cargill's supply chain to invest with us to accelerate progress and scale solutions that help balance farmer livelihoods, protection of forests and native vegetation, and support strong, resilient communities. More generally however, Cargill is a privately owned company and most of its assets are reinvested for the long term success of the business. As mentioned above, the long term drivers of value for the company include: innovating what matters, unlock Cargill's full potential, and growing new markets. Examples of capital investments in these areas include: Memphis Meats is a California-based company seeking to commercialize cultured meat grown directly in a lab. This year, we were an early investor in Memphis Meats to spur new types of alternative proteins. Descartes Labs specializes in machine learning and refining large data sets from sources like satellite imagery. Our partnership with the company helps us analyze huge quantities of data to better forecast crop production both globally and locally. To expand innovation within food and agriculture, we joined with Techstars, a top global technology accelerator, and Ecolab, a global leader in water, hygiene and energy technologies and services. Our Farm to Fork Accelerator will work with promising startups to share expertise and other resources, including a 13-week program to support the development of new products and business models that will culminate in a showcase for investors. Asset sighting, location, size, and feeder area are assessed based-on land use impact and risk and incorporated into our financial planning.

F6. Implementation

F6.1

(F6.1) Did you have any timebound and quantifiable targets for increasing sustainable production and/or consumption of your disclosed commodity(ies) that were active during the reporting year?

Yes

F6.1a

(F6.1a) Provide details of your timebound and quantifiable target(s) for increasing sustainable production and/or consumption of the disclosed commodity(ies), and progress made.

Target reference number

Target 1

Forest risk commodity

Palm oil

Type of target

Traceability

Description of target

Fully traceable with 100% traceability to plantation

Linked commitment

Zero net/gross deforestation

Traceability point

Plantation

Third-party certification scheme

<Not Applicable>

Start year

2014

Target year

2020

Quantitative metric

<Not Applicable>

Target (number)

<Not Applicable>

Target (%)

100

% of target achieved

48

Please explain

In 2019, Cargill achieved a combined average of 93 percent traceability to the mill and 48 percent traceability to the plantation for the palm oil and palm kernel oil it purchases and trades, and has a goal of a 100 percent transparent, traceable and sustainable in high-priority palm supply chains by 2020.

Target reference number

Target 2

Forest risk commodity

Soy

Type of target

Traceability

Description of target

We are mapping 100% of our direct source in 2020 and we are currently mapping indirect suppliers in the four countries that contain the high-risk biomes of the Amazon, Cerrado and Gran Chaco, using georeferenced single points to identify their locations. We aim to complete this process in 2020. Sharing a summary of this information is part of our effort to increase transparency across our South American soy supply chain.

Linked commitment

No conversion of natural ecosystems

Traceability point

Farm

Third-party certification scheme

<Not Applicable>

Start year

2014

Target year

2020

Quantitative metric

<Not Applicable>

Target (number)

<Not Applicable>

Target (%)

100

% of target achieved

100

Please explain

Cargill mapped 100% of its Brazilian supply chain with georeferenced single points – completing the project six months of schedule. Georeferenced single points allow the company to identify the locations of its direct and points of procurement for our suppliers, a critical step toward effectively protecting forests and native vegetation. Additional statistics: Our soybean volume origination in Brazil by biome : 12% Amazon, 48% Cerrado, 40% Other 980,000,000 hectares were analyzed in our risk assessment at a resolution of 30 meters Our agricultural supply chain business in South America buys crops from more than 13,500 farmers.

Target reference number

Target 3

Forest risk commodity

Other - Cocoa

Type of target

Traceability

Description of target

100% farm to factory traceability of our cocoa beans 100% chocolate ingredients sourced in line with our sustainability code of conduct

Linked commitment

Not linked to specific commitment

Traceability point

Farm

Third-party certification scheme

<Not Applicable>

Start year

2011

Target year

2030

Quantitative metric

<Not Applicable>

Target (number)

<Not Applicable>

Target (%)

100

% of target achieved

50

Please explain

In 2018-2019, 43% of our cocoa volumes was third-party certified sustainable. We have reached 50% farm to factory traceability with our technological innovations in Ghana and Cote d'Ivoire. In 2018-2019, we engaged extensively with the suppliers of cocoa in our indirect supply chain. We expect them to identify the risks in their supply chains related to human rights, child labor and deforestation.

F6.2**(F6.2) Do you have traceability system(s) in place to track and monitor the origin of your disclosed commodity(ies)?**

	Do you have system(s) in place?	Description of traceability system	Exclusions	Description of exclusion
Timber products	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Palm oil	Yes	In 2019, Cargill achieved a combined average of 93 percent traceability to the mill and 48 percent traceability to the plantation for the palm oil and palm kernel oil it purchases and trades. Cargill's trading and oil refining businesses that report sourcing information quarterly. When Cargill buys from a third party supplier, the third party is asked to provide GPS coordinates, among other details, for the source mill. Cargill has also adopted a risk-calibrated approach for traceability to plantation which focuses on data for areas at higher risk of unsustainable practices, including deforestation, peatland clearance and fires.	Business activity	The company's focus to date has been on its 12 businesses that are the primary producers, traders and processors of palm and have the greatest material risk. Future efforts may include additional food and feed supply chains to be assessed.
Cattle products	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Soy	Yes	Brazil: we mapped 100% of our soy supply chain with georeferenced single points six months ahead of schedule. We continue to develop more precise traceability tools to help drive transformation in South America's soy sector. We are currently identifying the locations of the farms for all of our direct suppliers and the points of procurement for our indirect suppliers in the countries that contain the high-risk biomes of the Amazon, Cerrado and Gran Chaco, as well as Uruguay, using georeferenced single points. We aim to complete this process in 2020 and have already done so for Brazil, which represents the largest share of our soy supply chain in South America. 95.68% of our soy volumes in Brazil for the 2018-19 crop year were deforestation- and conversion-free (DCF), based on this analysis. Additional statistics: Our soybean volume origination in Brazil by biome : 12% Amazon, 48% Cerrado, 40% Other 980,000,000 hectares were analyzed in our risk assessment at a resolution of 30 meters Our agricultural supply chain business in South America buys crops from more than 13,500 farmers.	Not applicable	<Not Applicable>
Other - Rubber	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Other - Cocoa	Yes	In 2018-2019, 43% of our cocoa volumes was third-party certified sustainable. We have reached 50% farm to factory traceability with our technological innovations in Ghana and Cote d'Ivoire. In 2018-2019, we engaged extensively with the suppliers of cocoa in our indirect supply chain. We expect them to identify the risks in their supply chains related to human rights, child labor and deforestation. We also launched our Cargill Cocoa Promise Sourcing Partner Network map, which shows the names and locations of cooperative offices in Cote d'Ivoire and buying stations in Ghana that are part of our direct sourcing network. We plan to achieve 100 percent traceability in Cote d'Ivoire by 2021 and introduce Cooperative Management Systems in Cameroon. Progress is also underway in Indonesia and Brazil through robust digital traceability systems. For our indirect supply chain, we have developed a due diligence system, which will enter its second phase of supplier engagement in 2020. We will also work with partners on sustainable chocolate ingredients, with a focus on dairy, sugar, vanilla and lecithin.	Not applicable	<Not Applicable>
Other - Coffee	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>

F6.2a**(F6.2a) Provide details on the level of traceability your organization has for its disclosed commodity(ies).**

Forest risk commodity	Point to which commodity is traceable	% of total production/consumption volume traceable
Palm oil	Mill	93
Soy	Farm	100
Other - Cocoa	Country	100

F6.3**(F6.3) Have you adopted any third-party certification scheme(s) for your disclosed commodity(ies)? Indicate the volume and percentage of your certified production and/or consumption.**

Forest risk commodity

Palm oil

Third-party certification scheme

RSPO (any type)

Certification coverage

Consumption volume

% of total production/consumption volume certified

29

Form of commodity

Crude palm oil (CPO)

Crude palm kernel oil (CPKO)

Palm oil derivatives

Palm kernel oil derivatives

Volume of production/ consumption certified

752712

Metric

Metric tons

Please explain

Cargill is committed towards a 100% transparent, traceable and sustainable palm supply chain by 2020. Our policy is rooted in the Principles and Criteria of the Roundtable on Sustainable Palm Oil (RSPO) and we believe they serve as the primary global sustainability standards for palm products and encourage all end-users of palm oil and palm oil products in the mature markets. All operations with exception for some of the mills acquired under Poliplant Group in 2014 are certified. Cargill's acquisition of Poliplant Group in 2014 comprises five plantations of approximately 50,000 hectares of planted company and smallholder land. In 2016, PT. Poliplant Sejahtera's (PSA) mill and estate operations were the first under Poliplant Group to be RSPO certified. PSA's certification cover Siriham mill operations and 4,005 hectares of associated inti (company-owned) estates. In 2019, over 3,000 smallholders across eight cooperatives at Cargill's PT Poliplant Sejahtera oil palm plantation in West Kalimantan received RSPO certification. They join four other groups of smallholders in Cargill's Indonesian supply chain with RSPO certification (at PT Hindoli in South Sumatra, Poliplant Group, PT Harapan Sawit Lestari and PT Indo Sawit Kekal in West Kalimantan). To date, Cargill has helped more than 16,500 of its smallholders in Indonesia to be RSPO certified. Available data is in RSPO ACOP and takes into account only what is being produced internally. Certified production volume is an estimation based on conversion of Crude Palm Kernel to Crude Palm Kernel Oil. Information on Crude Palm Kernel can be found on our RSPO ACOP report.

Forest risk commodity

Soy

Third-party certification scheme

RTRS (any type)

Certification coverage

Consumption volume

% of total production/consumption volume certified

0

Form of commodity

Whole soy beans

Soy bean oil

Soy bean meal

Soy biodiesel

Volume of production/ consumption certified

50900

Metric

Metric tons

Please explain

Cargill buys RTRS soy from certified producers. Cargill's Chain of Custody certificate is audited annually. Telling consumers the story of certified soy Since launching in 2010, our 3S program has sourced soy from farms that are certified to meet exceptionally high standards for agricultural practices, labor and environmental impact. About 200 farmers in Brazil participate in the program today, which is independently verified and is focused on continuous improvement each year. Farmers get technical assistance to enhance their operations from experts at organizations like IBS. Because 3S is deforestation- and conversion-free, it aligns with European Union standards and programs such as RTRS, ISCC, FEFAC and others. This makes it ideal for our European customers who have a strong interest in soy that addresses several dimensions of sustainability. Today 400,000 hectares are monitored across six Brazilian states as part of our 3S program. Talking about change with farmers in Paraguay As the expectations of our customers and their consumers change, we are taking that message to farmers in the region to help them grow soy in a more sustainable way so that they can maintain their market access. At a sustainable agriculture seminar this August in Paraguay's Naranjal district, our sustainability team spoke with more than 700 people about sustainability issues, market demands and good agricultural practices. We also started the process of deploying our 3S program in Paraguay, beginning by training our commercial teams. We rolled out a 3S pilot at five farms in October, with the aim of expanding 3S to 200 farming operations in the country for the 2020 crop. % of volume is confidential.

Forest risk commodity

Other - Cocoa

Third-party certification scheme

Other, please specify (UTZ, Rainforest Alliance, FairTrade, Organic))

Certification coverage

Consumption volume

% of total production/consumption volume certified

43

Form of commodity

Other, please specify (Cocoa Beans, Cocoa Liquor, Cocoa Powder, Cocoa Butter, Chocolate Products)

Volume of production/ consumption certified

Metric

Please select

Please explain

Cargill purchases its cocoa beans directly from farmers through farmer organizations, as well as through third parties. In 2018-2019, 43% of our cocoa volumes was third-party certified sustainable. 83% of our sustainable beans are sourced from our direct networks in West Africa, 17% come through third party sourcing

F6.4

(F6.4) For your disclosed commodity(ies), do you have a system to control, monitor, or verify compliance with no conversion and/or no deforestation commitments?

	A system to control, monitor or verify compliance	Comment
Timber products	<Not Applicable>	<Not Applicable>
Palm oil	Yes, we have a system in place for our no conversion and/or deforestation commitments	<Not Applicable>
Cattle products	<Not Applicable>	<Not Applicable>
Soy	Yes, we have a system in place for our no conversion and/or deforestation commitments	<Not Applicable>
Other - Rubber	<Not Applicable>	<Not Applicable>
Other - Cocoa	Yes, we have a system in place for our no conversion and/or deforestation commitments	<Not Applicable>
Other - Coffee	<Not Applicable>	<Not Applicable>

F6.4a

(F6.4a) Provide details on the system, the approaches used to monitor compliance, the quantitative progress, and the non-compliance protocols, to implement your no conversion and/or deforestation commitment(s).

Forest risk commodity

Palm oil

Operational coverage

Direct operations
Supply chain

Description of control systems

We monitor supplier progress in our operations and third-party supply chain through several mechanisms including the use of satellite imageries, self-assessments, field assessments and verifications. We are also leveraging the NDPE Implementation Reporting Framework to track performance in our indirect supply chain and to prioritize suppliers for engagement and continuous improvement. For our own operations, we have improved procedures to verify continued compliance with our policy, and regularly conduct internal audits on NDPE practices in addition to scheduled RSPO audits. We also use the Zoological Society of London's Spatial Monitoring and Reporting Tool conservation software to conduct effective, real-time patrolling of the HCV and HCS areas in and around our five plantations in Indonesia. We partner with the Natural Resources Conservation Center to monitor the Cagar Alam wildlife reserve boundaries near our Poliplant plantation in West Kalimantan to protect biodiversity.

Monitoring and verification approach

Geospatial monitoring tool
Ground-based monitoring system
Community-based monitoring
First-party verification
Second-party verification
Third-party verification

% of total volume in compliance

100%

% of total suppliers in compliance

100%

Response to supplier non-compliance

Retain & engage
Suspend & engage
Exclude

Procedures to address and resolve non-compliance with suppliers

Developing time-bound targets and milestones to bring suppliers back into compliance
Providing information on appropriate actions that can be taken to address non-compliance
Assessing the efficacy and efforts of non-compliant supplier actions through consistent and quantified metrics
Re-integrating suppliers back into supply chain based on the successful and verifiable completion of activities

Please explain

Cargill's Palm Grievance Process serves as a guide to review, address, and monitor the outcome of any grievance from any external parties concerning the Palm Policy across Cargill's global palm supply chain. It aims to provide a transparent, open, and predictable process for dealing with grievances. Cargill recognizes and appreciates that feedback and input from stakeholders help to enhance transparency and continuous improvement of our supply chain. Cargill's grievance process is developed with the aim of achieving long-term transformation of our supply chain and the palm oil industry. 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. This Palm Grievance Process is deployed by Cargill to handle any grievance from internal or external parties, including individuals, employees, contractors, suppliers, and civil society organizations concerning implementation of the Palm Policy. This includes recording grievances, verifying claims, rectifying confirmed issues, reporting the verification results and actions, delivering the response to stakeholders and managing and monitoring follow-up actions. Cargill's Code of Conduct and Guiding Principles, Commitment on Human Rights cover our direct operations.

Forest risk commodity

Other - Cocoa

Operational coverage

Direct operations

Supply chain

Description of control systems

Digital technology enables us to provide our customers with fast and transparent sustainability data, helping them measure and report the impact they achieve through the Cargill Cocoa Promise. As of this year, half of the cocoa in our global direct supply chain is traceable from farm to factory, with the help of barcoded cocoa bags and digital Cooperative Management Systems. Today, 72 percent of farmers are reached with GPS polygon mapping. In combination with satellite imagery, this enables us to effectively monitor deforestation risks. On our website, we started to disclose all farmer organizations in our direct sourcing network in Ghana and Côte d'Ivoire, with the other countries to follow. For these technologies to generate lasting impact for farmers, the partnership and actions by all actors are crucial levers to scale up. Monitoring occurs annually as new land use change data becomes available. 100% chocolate ingredients sourced in line with our sustainability code of conduct

Monitoring and verification approach

Geospatial monitoring tool

First-party verification

Third-party verification

% of total volume in compliance

100%

% of total suppliers in compliance

100%

Response to supplier non-compliance

Retain & engage

Suspend & engage

Exclude

Procedures to address and resolve non-compliance with suppliers

Developing time-bound targets and milestones to bring suppliers back into compliance

Providing information on appropriate actions that can be taken to address non-compliance

Assessing the efficacy and efforts of non-compliant supplier actions through consistent and quantified metrics

Please explain

Digital technology enables us to provide our customers with fast and transparent sustainability data, helping them measure and report the impact they achieve through the Cargill Cocoa Promise. As of this year, half of the cocoa in our global direct supply chain is traceable from farm to factory, with the help of barcoded cocoa bags and digital Cooperative Management Systems. Today, 72 percent of farmers are reached with GPS polygon mapping. In combination with satellite imagery, this enables us to effectively monitor deforestation risks. On our website, we started to disclose all farmer organizations in our direct sourcing network in Ghana and Côte d'Ivoire, with the other countries to follow. For these technologies to generate lasting impact for farmers, the partnership and actions by all actors are crucial levers to scale up. Monitoring occurs annually as new land use change data becomes available. Cargill is known as a company that conducts its business in a legal and ethical manner. Our Code of Conduct and the corresponding Supplier Code of Conduct outline standards for conducting business around the world. The Code of Conduct and the Guiding Principles also serve as the foundation of our Commitment on Human Rights. We have zero tolerance for bribery and other corrupt practices. 100% chocolate ingredients sourced in line with our sustainability code of conduct Cargill's Code of Conduct and Guiding Principles, Commitment on Human Rights cover our direct operations.

Forest risk commodity

Soy

Operational coverage

Direct operations

Supply chain

Description of control systems

Cargill's Policy on Sustainable Soy – South American Origins 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 verify progress. Cargill's Code of Conduct and Guiding Principles, Commitment on Human Rights cover our direct operations. Our local commercial teams have been fully trained on these tools and procedures.

Monitoring and verification approach

Geospatial monitoring tool

Ground-based monitoring system

% of total volume in compliance

100%

% of total suppliers in compliance

100%

Response to supplier non-compliance

Retain & engage

Suspend & engage

Procedures to address and resolve non-compliance with suppliers

Developing time-bound targets and milestones to bring suppliers back into compliance

Providing information on appropriate actions that can be taken to address non-compliance

Assessing the efficacy and efforts of non-compliant supplier actions through consistent and quantified metrics

Please explain

Our action levers are based on our beliefs regarding the most effective means to achieve the change that we and our stakeholders want, specifically, protecting forests and natural vegetation while enabling rural economic development. Our approach acknowledges that farmers can be part of the solution to a variety of critical sustainability challenges. Agriculture has an important effect on a host of social and human rights issues such as rural economic development and the rights of workers, communities and indigenous peoples. Farmers themselves also have rights. We recognize that they may have legal rights concerning land conservation and agriculture. In order to

positively influence land conversion practices, we promote the development of economic alternatives for farmers. In all of this, we believe that sector-wide transformation is the best pathway to success. We will continue to use suspension as a lever when necessary. This includes suspending any suppliers who violate pre-existing embargoed or protected areas, who appear on government lists related to forced-labor practices, or who engage in illegal operations. Anytime a grievance or monitoring detects non-compliance that is then confirmed we take action to address the non-compliance. No known non-compliance remains in the supply chain. Cargill's Code of Conduct and Guiding Principles, Commitment on Human Rights cover our direct operations.

F6.5

(F6.5) For your disclosed commodity(ies), indicate if you collect data regarding your own compliance and/or the compliance of your suppliers with the Brazilian Forest Code.

	Do you collect data regarding compliance with the Brazilian Forest Code?	Please explain
Timber products	<Not Applicable>	<Not Applicable>
Palm oil	No, we do not collect data	Not relevant.
Cattle products	<Not Applicable>	<Not Applicable>
Soy	Yes, from suppliers	Cargill does not do business with producers who violate the Brazilian Forest Code, and we have internal processes and controls to prevent acquisitions from embargoed areas and guarantee the sale of products originated from properties that are in compliance with Brazilian law. Brazil - for certified products we request the Rural Environmental Registry - CAR and in our recently launched Soy Action Plan by 2020 we will: complete single-point location mapping for 100% of direct suppliers in Matopiba, Amazon, Mato Grosso and those adjacent to protected areas (where the CAR is not already available). We will continuously improve this with validated and regularly updated CAR documentation. For all producers that we finance the CAR is a condition of purchase. To make sure that soy does not enter our supply chains from farming operations accused of illegal deforestation or slave labor in Brazil, we have built a robust system of controls. On a daily basis, this system consults government lists of embargoed farms and blocks them so they are not eligible to sell soy to us. Our system also consults lists of non-compliant farms managed by the Soy Working Group (GTS) based on the Amazon Soy Moratorium as well as voluntary programs managed by the state of Pará such as the Green Grain Protocol. When a farm is blocked in our system for being on one of these lists, we also block other farms registered to the same person or entity either in the local area or the entire country, depending on the violation involved. These affiliated farms are only unblocked once we have conducted an analysis to ensure that soy from the violating farm is not being rerouted and sold to us through an affiliated operation. They are re-evaluated with each new crop season to ensure that they are still complying. Our local commercial teams have been fully trained on these tools and procedures. Additional statistics: Our soybean volume origination in Brazil by biome : 12% Amazon, 48% Cerrado, 40% Other Our agricultural supply chain business in South America buys crops from more than 13,500 farmers.
Other - Rubber	<Not Applicable>	<Not Applicable>
Other - Cocoa	Yes, from suppliers	Cargill Cocoa and Chocolate in Brazil is in the process of polygon mapping 100% of certified farms that direct supply our cocoa. We also obtain polygons of Legal Reserves and Permanent Protected Areas as required by the Brazilian Forest Code. Together with NGO Imaflores Cargill supports farmers in the process of mapping their farms including for compliance purposes including the updating and validation of their CAR documentation. Cargill operates an internal system that frequently verified farms for embargoed areas and prevents Cargill Cocoa and Chocolate Brazil of doing business with farmers that violate the Brazilian Forest Code.
Other - Coffee	<Not Applicable>	<Not Applicable>

F6.5b

(F6.5b) For your disclosed commodity(ies), indicate which Key Performance Indicators (KPIs) you use to measure the compliance of your suppliers with the Brazilian Forest Code and their performance against these indicator(s).

Forest risk commodity

Soy

KPIs

% of suppliers registered on the Rural Environmental Registry (CAR) database, with active status

Performance against indicators

100%

Please explain

We are not and will not source soy from farmers who clear land in the protected areas and we have controls in place to prevent non-compliant product from entering our – and our customers’ – supply chains. This includes validating all supply against the Brazilian Forest Code Program through the CAR (Rural Environmental Registry) and cross-checking with the Brazilian government embargoed lists when we establish a contract, and again before receiving physical product. To make sure that soy does not enter our supply chains from farming operations accused of illegal deforestation or slave labor in Brazil, we have built a robust system of controls. On a daily basis, this system consults government lists of embargoed farms and blocks them so they are not eligible to sell soy to us. Our system also consults lists of non compliant farms managed by the Soy Working Group (GTS) based on the Amazon Soy Moratorium as well as voluntary programs managed by the state of Pará such as the Green Grain Protocol. When a farm is blocked in our system for being on one of these lists, we also block other farms registered to the same person or entity either in the local area or the entire country, depending on the violation involved. These affiliated farms are only unblocked once we have conducted an analysis to ensure that soy from the violating farm is not being rerouted and sold to us through an affiliated operation. They are re-evaluated with each new crop season to ensure that they are still complying. Suppliers with no embargoed areas from IBAMA or who are respecting an embargo = 100%. Cargill does not purchase from embargoed areas. All suppliers are checked. Suppliers with no slave labor = 100%. Cargill doesn't source from suppliers / areas that have used slave labor in operations. % of suppliers with gross deforestation after July 2008 in the Amazon Biome = 0%. All suppliers are checked. Additional statistics: Our soybean volume origination in Brazil by biome : 12% Amazon, 48% Cerrado, 40% Other 980,000,000 hectares were analyzed in our risk assessment at a resolution of 30 meters Our agricultural supply chain business in South America buys crops from more than 13,500 farmers.

Forest risk commodity

Soy

KPIs

% of suppliers with no gross deforestation after July 2008

Performance against indicators

91-99%

Please explain

95.68% of our soy volumes in Brazil for the 2018-19 crop year were estimated to be deforestation- and conversion-free How we calculated our results 1. Satellites continuously gather data about land use and feed it to many organizations for research and analysis. 2. The U.S. Geological Survey and the University of Maryland regularly publish datasets on crop production and land conversion, respectively. 3. Our team analyzed both of these datasets to calculate how much of Brazil's soy production has taken place on land converted from native vegetation since 2008, a date that aligns with Brazil's Forest Code. The remainder is deforestation- and conversion-free (DCF). 4. Knowing the sector-wide rate of soy that is DCF for each state (see map below), we multiplied those percentages by the soy volumes Cargill originated in the 2018-19 crop year. For the states of Pará and Rondônia in the Amazon biome, we know that all of the soy we buy is DCF because every purchase we make is independently audited to ensure it is in compliance with the Soy Moratorium. So Cargill's DCF rate for these two states is 100%. We then tallied our estimated DCF soy for all of Brazil and divided by our total soy volumes countrywide to arrive at Cargill's estimated percentage of DCF soy. Additional statistics: Our soybean volume origination in Brazil by biome : 12% Amazon, 48% Cerrado, 40% Other 980,000,000 hectares were analyzed in our risk assessment at a resolution of 30 meters Our agricultural supply chain business in South America buys crops from more than 13,500 farmers.

F6.6

(F6.6) For your disclosed commodity(ies), indicate if you assess your own compliance and/or the compliance of your suppliers with forest regulations and/or mandatory standards.

	Assess legal compliance with forest regulations	Please explain
Timber products	<Not Applicable>	<Not Applicable>
Palm oil	Yes, from both suppliers and owned/managed land	<Not Applicable>
Cattle products	<Not Applicable>	<Not Applicable>
Soy	Yes, from suppliers	<Not Applicable>
Other - Rubber	<Not Applicable>	<Not Applicable>
Other - Cocoa	Yes, from suppliers	<Not Applicable>
Other - Coffee	<Not Applicable>	<Not Applicable>

F6.6a

(F6.6a) For you disclosed commodity(ies), indicate how you ensure legal compliance with forest regulations and/or mandatory standards.

Palm oil

Procedure to ensure legal compliance

Cargill's Policy on Sustainable Palm Oil, released in July 2014, is committed to local, national and international legal compliance. For our own operations, we have improved procedures to verify continued compliance with our policy and we regularly conduct internal audits on NDPE practices in addition to scheduled RSPO audits. For our third party supply chain, we continue to monitor the progress of our suppliers using self-assessment questionnaires and field verifications where relevant. For new suppliers, Cargill implements a new supplier due diligence process. This includes requesting for potential suppliers to declare if they have the legal permits to operate. Based on the Risk Calibrated Approach to traceability, we prioritize engagement and collection of data from suppliers in high-priority landscapes with greater risk of noncompliance. The company will carry out on-the-ground field assessments in partnership with third parties. As we progress from traceability to supply chain transformation, we will work with mills and third-party suppliers to deepen our engagement with smallholders to uphold our policy and implement best practices. Cargill also conducts satellite monitoring to identify and address potential deforestation alerts and verify that our suppliers are NDPE compliant.

Country/Area of origin

Brazil
Colombia
Ecuador
Guatemala
Honduras
Indonesia
Malaysia
Mexico
Nicaragua
Panama
Papua New Guinea
Peru
Venezuela (Bolivarian Republic of)

Law and/or mandatory standard(s)

General assessment of legal compliance
ISPO
MSPO

Comment

Soy

Procedure to ensure legal compliance

Cargill is a signatory to the Amazon Soy Moratorium. The Amazon Soy Moratorium is a sectorial agreement signed in 2006, in which companies undertake not to market or finance soy produced in areas that were deforested (legally or illegally) in the Amazon biome after 2008. Thus, through robust procedures, Cargill verifies that it does not market or even finance soy produced in areas deforested in the Biome after July 22, 2008, the reference date of the Forest Code. Furthermore, Cargill don't buy any soy with illegal deforestation (IBAMA's list, LDI-PA, SEMA-MT) and slaver labor (Ministry of Employment list). Cargill is a signatory of Pará's agreement Green Grain Protocol. Under this commitment, we check several criteria before purchasing grains in the state: valid CAR, embargo (IBAMA and LDI), illegal deforestation, slave labor list, overlap with conservation units or indigenous territories. We have an automatic system that runs a routine daily in order to block non-compliant farms and farmers. When a farm is blocked in our system for being on one of these lists, we also block other farms registered to the same person or entity either in the local area or the entire country, depending on the violation involved. These affiliated farms are only unblocked once we have conducted an analysis to verify that soy from the violating farm is not being rerouted and sold to us through an affiliated operation.

Country/Area of origin

Brazil

Law and/or mandatory standard(s)

Brazilian Forest Code

Comment

Other - Cocoa

Procedure to ensure legal compliance

We can achieve our purpose only by working closely with our Supplier Partners. 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. Variations in local governance, law enforcement limitations, and diverging definitions of what constitutes forest demand a thoughtful and tailored approach. This is why we work closely with partners within and across our supply chains, as well government and civil society, to drive impactful solutions on the ground.

Country/Area of origin

Cameroon
Côte d'Ivoire

Law and/or mandatory standard(s)

General assessment of legal compliance

Comment

All Cargill globally are covered by our Supplier Code of Conduct.

F6.7

(F6.7) Are you working with smallholders to support good agricultural practices and reduce deforestation and/or conversion of natural ecosystems?

	Are you working with smallholders?	Type of smallholder engagement approach	Smallholder engagement approach	Number of smallholders engaged	Please explain
Timber products	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Palm oil	Yes, working with smallholders	Capacity building	Organizing capacity building events		Cargill launched a sustainability program in Malaysia in 2013 with NGOs Wild Asia and Solidaridad to help independent smallholder farmers meet RSPO standards for palm production. The project helped expand the number of independent smallholders and independent mills who achieved RSPO certification from 34 in 2015 to 175 in 2017. 356 smallholders in Perak have now been certified. In 2019, the smallholders were recognized for their achievement to be the first to receive both Malaysian Sustainable Palm Oil and RSPO certification. In Indonesia, the smallholder program at Cargill's PT Hindoli plantation works directly with thousands of farmers to help them increase yields, improve incomes and raise their standards of living. Cargill's investments are enhancing agricultural production, developing infrastructure and supporting education, healthcare and the community's other economic and social needs. In 2009, Cargill's PT Hindoli plantation was one of the first plantations to be RSPO certified. Continued improvements will be implemented to include adjacent smallholder land and in attaining certification under the International Sustainability and Carbon Certification (ISCC) scheme, which provides a framework for measuring greenhouse gas reductions. Cargill's PT Harapan Sawit Lestari plantation received ISCC certification in 2013 and RSPO certification in 2014, including smallholder farmers. In 2019, over 3,000 smallholders across eight cooperatives at Cargill's PT Poliplant Sejahtera oil palm plantation in West Kalimantan received RSPO certification. They join four other groups of smallholders in Cargill's Indonesian supply chain with RSPO certification at PT Hindoli, PT Harapan Sawit Lestari, Poliplant Group and PT Indo Sawit Kekal. To date, Cargill has helped over 16,500 of its smallholders in Indonesia to be RSPO certified. Cargill is also supporting independent smallholders in Ketapang to improve productivity and sustainability while verifying NDPE requirements. Cargill mapped smallholders outside of palm concessions in Air Upas and Manis Mata districts, with over 10,000ha mapped in 2019. Cargill also signed a co-funding agreement with IDH to support 3,500 independent smallholders to obtain sustainability certification. In 2019, Cargill announced partnership to support 105 independent smallholders in Guatemala to attain RSPO certification.
Cattle products	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Soy	Yes, working with smallholders	Capacity building Financial and commercial incentives	Offering on-site technical assistance and extension services Providing agricultural inputs Disseminating technical materials		Since 2006, Cargill has been working as part of the Brazilian soy industry with non-governmental organizations (NGOs) including Greenpeace, WWF, TNC, Conservation International, and IPAM in the Soy Moratorium. This joint Soy Working Group is focused on reducing deforestation and ensuring sustainable soy production in the Amazon biome. The Soy Working Group has established an effective mapping and monitoring system. Using this control, Cargill and other signatories of the Soy Moratorium only acquire soybeans grown in compliant areas within the Amazon Biome. Booklets and training sessions have been to put in place to help rural producers and local stakeholders understand the Moratorium's objectives, comply with the Brazilian Forest Code and learn about good agricultural practices. Cargill created five short videos about the Environmental Rural Registry (CAR) and disseminated them to all its producers. Cargill is also working to help smallholder soy farmers find commercial success. Through its membership in ABIOVE, Brazil's industry association for vegetable oils, Cargill is supporting the Soja Plus Program, which encourages environmental conservation, better agricultural practices and improving the rights and well-being of rural producers and other workers in soy supply chains. Since 2011, Soja Plus has provided technical assistance on 1,322 farms. All the properties registered in the Soja Plus program produce around 7.15 million tons of soybeans, which represents about 8% of the Brazilian oilseed production. In area, Soja Plus covers approximately 2.4 million hectares in Brazil. Cargill's Program for Family Agriculture in Brazil, which began in 2012, reached around 2,341 smallholders during the 2017-18 crop season, offering them free agronomic analysis and other technical support while also paying them a premium on their crops, acquiring a volume greater than 200,000 tons of soy, in the following states: Goias, Mato Grosso do Sul, Minas Gerais, Parana and Santa Catarina. The Program allowed the Cargill factory for biodiesel in Tres Lagoas (MS) to obtain the Social Fuel Seal, which is given by the Ministry for Agrarian Development (MDA) to biodiesel producers that promote social inclusion and regional development by means of generating jobs and income for family farmers who have the Pronaf Declaration of Suitability (PDS).
Other - Rubber	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Other - Cocoa	Yes, working with smallholders	Supply chain mapping Capacity building Financial and commercial incentives	Supplier questionnaires on environmental and social indicators Developing or distributing supply chain mapping tool Supplier audits Offering on-site technical assistance and extension services Providing agricultural inputs Disseminating technical materials Organizing capacity building events Investing in pilot projects Supporting smallholders to clarify and secure land tenure Prioritizing support for smallholders in high-risk deforestation regions Paying higher prices linked to best agricultural practices Financial incentives for certified products	210000	Description of the main strategy of engagement The Cargill Cocoa Promise is our commitment to improving the lives of cocoa farmers and their communities. At the same time, it will help us to secure a long-term supply of cocoa for our business. Our ambition is to accelerate progress towards a transparent global cocoa supply chain, to enable cocoa farmers and their communities to achieve better incomes and living standards, and to deliver a sustainable supply of cocoa and chocolate products - from tree crop to end-product. We will achieve this ambition by leveraging our global reach and experience, and by working together with our vast network of partner organizations and stakeholders. These partnerships include the 200 farmer organizations we work with as well as NGOs, governments and industry partners with whom we are tackling big issues such as farm profitability, child labor and social services.

	Are you working with smallholders?	Type of smallholder engagement approach	Smallholder engagement approach	Number of smallholders engaged	Please explain
Other - Coffee	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>

F6.8

(F6.8) Are you working with your direct suppliers to support and improve their capacity to comply with your forests-related policies, commitments, and other requirements?

	Are you working with direct suppliers?	Type of direct supplier engagement approach	Direct supplier engagement approach	% of suppliers engaged	Please explain
Timber products	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Palm oil	Yes, working with direct suppliers	Supply chain mapping Capacity building	Supplier questionnaires on environmental and social indicators Developing or distributing supply chain mapping tool Supplier audits Disseminating technical materials Organizing capacity building events Investing in pilot projects	Please select	In partnership with Earthworm Foundation and Proforest, among others, Cargill hosts workshops and conducts assessments to improve understanding of key issues, best practices and identify gaps among our third party supply chain. Using the Global Forest Watch Commodities (GFWC) PALM Risk Tool and our Risk Calibrated Approach, we are able to map our palm supply chain to understand where the palm oil comes from and to prioritize those with operations in high risk areas for engagement and action. Cargill has visited a growing number of palm oil mills, estates, dealers and smallholders to assess their performance in comparison to the sustainability criteria outlined in its own palm oil policy and those set forth by the RSPO. Proforest and Earthworm provide feedback to the suppliers and help Cargill identify compliance gaps so it can assist suppliers in developing time-bound corrective action plans and provide training on key areas. In 2019, we reached 100% engagement with direct suppliers in our Latin America sourcing region through workshops, visits, self-assessments and follow-up visits. We have also completed all initial engagements with all our direct suppliers in Malaysia. In Indonesia, we rolled out our group-level engagement approach across our palm supply chain in Indonesia. Our group-level engagements are intended to influence the entire producer group and support them in advancing toward more sustainable practices across their entire organization. Cargill also supports landscape level projects to address issues achieving sustainable supply sheds on a broader scale.
Cattle products	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Soy	Yes, working with direct suppliers	Supply chain mapping Capacity building	Supplier questionnaires on environmental and social indicators Developing or distributing supply chain mapping tool Offering on-site training and technical assistance Disseminating technical materials	Please select	Since 2006, Cargill has been working as part of the Brazilian soy industry with non-governmental organizations (NGOs) including Greenpeace, WWF, TNC, Conservation International, and IPAM in the Soy Moratorium. This joint Soy Working Group (GTS) is focused on reducing deforestation and ensuring sustainable soy production in the Amazon biome. The GTS has established an effective mapping and monitoring system. Using this control, Cargill only acquire soybeans grown in compliant areas within the Amazon Biome. Cargill created five short videos about the Environmental Rural Registry (CAR) and disseminated them to all its producers. Cargill is also working to help smallholder soy farmers find commercial success. Cargill has been originating sustainable soy through its Sustainable Agriculture Initiative in Argentina and Paraguay. In 2017, to meet European customer demands, Cargill originated soy from 470 farms and 240 farmers under the 2BS scheme, and this soy supplies our ISCC certified crushing plant. In Argentina, Cargill has been originating sustainable soy under 2BS to meet the sustainable biofuels demand. Cargill is also working to help smallholder soy farmers find commercial success. In Brazil, Cargill's Program for Family Agriculture, which began in 2012, reached around 2,341 smallholders during the 2017-18 crop season, offering them free agronomic analysis and other technical support while also paying them a premium on their crops. Through its membership in ABIÓVE, Brazil's industry association for vegetable oils, Cargill is supporting the Soja Plus Program, which encourages environmental conservation, better agricultural practices and improving the rights and wellbeing of rural producers and other workers in soy supply chains. Since 2011, Soja Plus has provided technical assistance to Brazilian farms. Cargill directly invests in the program in the states of Goiás and Minas Gerais.
Other - Rubber	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>

	Are you working with direct suppliers?	Type of direct supplier engagement approach	Direct supplier engagement approach	% of suppliers engaged	Please explain
Other - Cocoa	Yes, working with direct suppliers	Supply chain mapping Capacity building Financial and commercial incentives	Supplier questionnaires on environmental and social indicators Developing or distributing supply chain mapping tool Supplier audits Offering on-site training and technical assistance Disseminating technical materials Organizing capacity building events Investing in pilot projects Paying higher prices linked to best agricultural practices Financial incentives for certified products	Please select	The Cargill Cocoa Promise is our commitment to improving the lives of cocoa farmers and their communities. At the same time, it will help us to secure a long-term supply of cocoa for our business. Our ambition is to accelerate progress towards a transparent global cocoa supply chain, to enable cocoa farmers and their communities to achieve better incomes and living standards, and to deliver a sustainable supply of cocoa and chocolate products - from tree crop to end-product. We will achieve this ambition by leveraging our global reach and experience, and by working together with our vast network of partner organizations and stakeholders. These partnerships include the 200 farmer organizations we work with as well as NGOs, governments and industry partners with whom we are tackling big issues such as farm profitability, child labor and social services.
Other - Coffee	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>

F6.9

(F6.9) Are you working beyond your first-tier supplier(s) to manage and mitigate deforestation risks?

	Are you working beyond first tier?	Type of engagement approach with indirect suppliers	Indirect supplier engagement approach	Please explain
Timber products	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Palm oil	Yes, working beyond first tier	Supply chain mapping Capacity building	Developing or distributing supply chain mapping tools Supplier questionnaires on environmental and social indicators Participating in workshops Investing in pilot projects	Our goal is to verify our direct and indirect suppliers are compliant with Cargill's NDPE Policy. Cargill offers support on action plans by direct suppliers which get rolled out to indirect suppliers. Cargill works through our direct suppliers to engage our indirect suppliers, providing them the training and tools they need to motivate improvements within their own suppliers while maintaining processes. We work with our direct suppliers to co-host NDPE workshops and trainings for the indirect suppliers to socialize the importance of NDPE. We have also been actively involved in developing the NDPE Implementation Reporting Framework together with stakeholders, a standard approach for monitoring a reporting progress on our NDPE commitments. The Implementation Reporting Framework also creates better visibility on performance within our indirect supply chain to enable us to engage for improvement and communicate progress. Our Palm Grievance Procedure also covers both our direct and indirect supply chain, where the supplier is expected to respond to grievances, set time-bound action plans to verify progress and close the grievance in a timely manner as agreed to by the complainant. Cargill supports landscape level projects to address issues achieving sustainable supply sheds on a broader scale. We joined a multi-stakeholder landscape-level intervention in 2018 to address environmental, land and labor issues in the Siak and Pelalawan districts in Indonesia. The program includes protecting and enhancing forests, peatlands and empowering smallholders and local communities in support of improved livelihoods.
Cattle products	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Soy	Yes, working beyond first tier	Supply chain mapping Capacity building Other	Supplier questionnaires on environmental and social indicators Supplier audits Offering on-site training and technical assistance Disseminating technical materials Participating in workshops	Since 2006, Cargill has been working as part of the Brazilian soy industry with non-governmental organizations (NGOs) including Greenpeace, WWF, TNC, Conservation International, and IPAM in the Soy Moratorium. This joint Soy Working Group is focused on reducing deforestation and ensuring sustainable soy production in the Amazon biome. The Soy Working Group has established an effective mapping and monitoring system. Using this control, Cargill and other signatories of the Soy Moratorium only acquire soybeans grown in compliant areas within the Amazon Biome. Cargill created five short videos about the Environmental Rural Registry (CAR) and disseminated them to all its producers. Cargill is also working to help smallholder soy farmers find commercial success. Cargill has been originating sustainable soy through its Sustainable Agriculture Initiative in Argentina and Paraguay. In 2017, to meet European customer demands, Cargill originated soy from 470 farms and 240 farmers under the 2BS scheme, and this soy supplies our ISCC certified crushing plant. In Argentina, Cargill has been originating sustainable soy under EPA regulations to meet the sustainable biofuels demand from the United States. Cargill is also working to help smallholder soy farmers find commercial success. In Brazil, Cargill's Program for Family Agriculture, which began in 2012, reached around 2,341 smallholders during the 2017-18 crop season, offering them free agronomic analysis and other technical support while also paying them a premium on their crops. Through its membership in ABIOVE, Brazil's industry association for vegetable oils, Cargill is supporting the Soja Plus Program, which encourages environmental conservation, better agricultural practices and improving the rights and well-being of rural producers and other workers in soy supply chains. Since 2011, Soja Plus has provided technical assistance to Brazilian farms. Cargill directly invests in the program in the states of Goiás and Minas Gerais.
Other - Rubber	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Other - Cocoa	Yes, working beyond first tier	Supply chain mapping Other	Supplier questionnaires on environmental and social indicators On-site meetings with indirect suppliers	In 2018-2019, we engaged extensively with the suppliers of cocoa in our indirect supply chain. We expect them to identify the risks in their supply chains related to human rights, child labor and deforestation. For our indirect supply chain, we have developed a due diligence system, which will enter its second phase of supplier engagement in 2020. We will also work with partners on sustainable chocolate ingredients, with a focus on dairy, sugar, vanilla and lecithin.
Other - Coffee	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>

F6.10

(F6.10) Do you participate in external activities and/or initiatives to promote the implementation of your forests-related policies and commitments?

Forest risk commodity

Palm oil

Do you participate in activities/initiatives?

Yes

Activities

Involved in multi-partnership or stakeholder initiatives

Initiatives

UN Global Compact

Roundtable on Sustainable Palm Oil (RSPO)

High Carbon Stock Approach Steering Group

International Sustainability & Carbon Certification (ISCC)

Other, please specify (Tropical Forest Alliance, European Palm Oil Alliance, SLWG, Palm Oil Collaboration Group)

Jurisdictional approaches

<Not Applicable>

Please explain

Description of the company's role within this activity: Cargill has been an active member of the RSPO since 2004. In 2013 Cargill joined the European Palm Oil Alliance, which provides a platform for palm-oil related issues and discussions. The group focuses on the growing demand for palm oil in both food and non-food applications and the need for all players across the palm oil supply chain – from plantations to retailers – to act in an environmentally sustainable and socially responsible manner. Cargill is

collaborating with Institut Pertanian Bogor (IPB) to build Indonesia's first oil palm teaching farm. The "IPB-Cargill Kebun Pendidikan Kelapa Sawit" (IPB-Cargill Oil Palm Teaching Farm) will provide training to students on the latest plantation production and management techniques. It will also serve as the reference for the application of the RSPO and the ISPO (Indonesian Sustainable Palm Oil) standards. Cargill works with the Indonesian Palm Oil Association (GAPKI) and the Indonesian government to advocate for sustainable palm oil development. Cargill was one of 15 plantation owners that volunteered to pilot the RSPO Principles & Criteria prior to their finalization. The company participates in the RSPO working groups on Human Rights, and Trade and Traceability and on Communications and Claims. Cargill is also a participant in the Tropical Forest Alliance (TFA), of which Consumer Goods Forum (CGF) is a part, and a participant in a working group which is working towards the implementation of a zero deforestation commitment. Cargill is also a member of High Carbon Stock Approach Steering Group. The Group's objective is to provide governance of the current HCS Approach and oversee further development of a methodology to achieve no deforestation. Cargill partnered with IDH, Winrock and Costco to develop a protocol for responsible peat management for smallholders, and continue to seek feedback on these protocols from a number of stakeholder initiatives including RSPO and the High Carbon Stock Approach Steering Group.

Forest risk commodity

Soy

Do you participate in activities/initiatives?

Yes

Activities

Involved in multi-partnership or stakeholder initiatives

Initiatives

UN Global Compact

Tropical Forest Alliance 2020 (TFA)

Cerrado Working Group (GTC)

Roundtable on Sustainable Soy (RTRS)

Sustainable Agricultural Initiative (SAI)

UK Roundtable on Sustainable Soy

Other, please specify (UNDP Green Commodities, Field to Market, SCF, GTC, WBCSD Forest Solutions Group)

Jurisdictional approaches

<Not Applicable>

Please explain

Through its membership in ABIOVE (Brazilian Association of Vegetable Oil Industries), Cargill is supporting the Soja Plus Program, which aims to empower rural producers to improve the management of their farms through distribution of materials, promotion of courses on health and safety work, adaptation of rural construction, environmental regularization, field days and technical visits to monitor performance. As a long-time member of the Round Table on Responsible Soy (RTRS), Cargill continues to be involved with other key global organizations to implement criteria for a responsible and sustainable approach to soy production globally. Cargill supports the U.S. soy industry's efforts to provide reassurance that U.S. soybeans are sustainably grown, helping to ensure export markets remain open. Cargill is participating in efforts to refine the U.S. Soybean Sustainability Assurance Protocol, introduced in 2013. Cargill is also a member of Field To Market: The Alliance for Sustainable Agriculture. Cargill is a participant in the Tropical Forest Alliance (TFA), of which Consumer Goods Forum (CGF) is a part, and a participant in a working group which is working towards the implementation of a zero deforestation commitment. Since 2006, Cargill has been working as part of the Brazilian soy industry with non-governmental organizations (NGOs) including Greenpeace, WWF, TNC, Conservation International, and IPAM in the Soy Moratorium. This joint Soy Working Group is focused on reducing deforestation and ensuring sustainable soy production in the Amazon biome. Furthermore, Cargill participates in the Brazilian Coalition on Climate, Forests, and Agriculture, in a working group that helps the government advance the implementation of a low carbon economy and the Forest Code. In 2016, Cargill joined the Green Commodities Programme in Paraguay, a multi-stakeholder initiative to improve sustainable production and regulatory compliance, which includes United Nations Development Programme, the government and other companies. GTC and SCF for more information: <https://www.cargill.com/doc/1432155385605/south-american-soy-action-plan-dec-2019.pdf>

Forest risk commodity

Other - Cocoa

Do you participate in activities/initiatives?

Yes

Activities

Involved in multi-partnership or stakeholder initiatives

Initiatives

UN Global Compact

Tropical Forest Alliance 2020 (TFA)

Other, please specify (CocoaAction, Cocoa & Forest Initiative, Cameroon "Green Cocoa Landscape" Program)

Jurisdictional approaches

<Not Applicable>

Please explain

Description of the company's role within this activity: Cargill is one of the signatories of the Cocoa and Forests Initiative (CFI) - a public-private partnership launched in 2017 bringing together the governments of Cote d'Ivoire and Ghana as well as leading cocoa and chocolate companies committed to end deforestation and restore forest areas. The initiative is led by the World Cocoa Foundation (WCF), IDH - the Sustainable Trade Initiative and the Prince of Wales's International Sustainability Unit. Cargill Cocoa & Chocolate is also part of CocoaAction, a program that galvanizes the cocoa supply chain to work alongside governments, industry actors to address farm-level challenges including forest-positive cocoa production systems. Cargill Cocoa & Chocolate signed a letter of intent to collaborate in the Cameroon "Green Cocoa Landscape" Program and promote sustainable development of the Cameroonian cocoa sector, contribute to forest protection and create a sustainable livelihood for farmers and their communities through an inclusive landscape approach .

Forest risk commodity

Other - Cocoa

Do you participate in activities/initiatives?

Yes

Activities

Involved in multi-partnership or stakeholder initiatives

Initiatives

Other, please specify (Cocoa & Forests Initiative)

Jurisdictional approaches

<Not Applicable>

Please explain

Wider industry collaboration on sharing data, best practices and learnings has the power to halt deforestation in a harmonized way. We are committed to share our insights and work closely with the industry and governments in origin countries, for instance through the Cocoa and Forests Initiative. The Governments of Côte d'Ivoire and Ghana and the world's leading cocoa and chocolate companies signed landmark agreements in November 2017 to end deforestation and promote forest restoration and protection in the cocoa supply chain. This public-private partnership – called the Cocoa & Forests Initiative (CFI) – has been organized by the World Cocoa Foundation (WCF), IDH - the Sustainable Trade Initiative, and The Prince of Wales's International Sustainability Unit (ISU), in partnership with the Governments of Côte d'Ivoire and Ghana.

F6.11

(F6.11) Is your organization supporting or implementing project(s) focused on ecosystem restoration and protection?

Yes

F6.11a

(F6.11a) Provide details on your project(s), including the extent, duration, and monitoring frequency. Please specify any measured outcome(s).

Project reference

Project 1

Project type

Other, please specify (The community forest project enables community members to protect and manage the forest while also obtaining an income from the sustainable use of natural resources.)

Primary motivation

Voluntary

Description of project

Palm: Conserving surrounding forests and waterways while supporting the rights of indigenous people. (Nanga Lauk community forest project) In December 2019, Cargill committed to finance the Nanga Lauk community forestry conservation project in West Kalimantan, Indonesia over 25 years as part of its RSPO remediation and compensation requirements. The Nanga Lauk community forest project is located in the Kapuas Hulu District of West Kalimantan, and comprises a Village Forest (Hutan Desa) totaling 1,430 hectares of peat swamp forest, marshland and lakes, and a Limited Production Forest with 9,169 hectares of peat swamp and forested areas adjacent to rivers, streams and lakes. Both the Nanga Lauk Village Forest and the Nanga Lauk Limited Production Forest support a population of about 700 residents in 197 households. For generations, the forest areas have been providing the community a means of livelihood through fishing, plant cultivation and the harvesting of wild forest products such as honey. The forests and their surrounding waterways are also a source of water, fuel, building materials and traditional medicine. The Nanga Lauk project is expected to set an example for high-quality conservation projects with long-term impact. The community forest project enables community members to protect and manage the forest while also obtaining an income from the sustainable use of natural resources. Through this project, Cargill will support the local indigenous community with training in basic business skills, harnessing natural resources and attracting sustainable ecotourism so that more than 700 villagers can improve their livelihoods and build a more sustainable future while conserving surrounding forests and waterways. This is the first project to be conceived via the Sustainable Commodities Conservation Mechanism (SCCM), which Cargill developed in conjunction with Lestari Capital to help businesses finance and deliver long-term conservation projects with lasting impact.

Start year

2019

Target year

2041-2045

Project area to date (Hectares)

1600

Project area in the target year (Hectares)

1600

Country/Area

Indonesia

Latitude

1.042026

Longitude

112.631406

Monitoring frequency

Annually

Measured outcomes to date

Biodiversity

Carbon sequestration

Financial

Please explain

The Nanga Lauk project is expected to set an example for high-quality conservation projects with long-term impact. The community forest project enables community members to protect and manage the forest while also obtaining an income from the sustainable use of natural resources. The project will enable the community to take greater control of their livelihoods through training in key areas including forest patrol, basic business skills, marketing and business development, management and processing of natural resources such as rattan, bamboo and wild honey, and ecotourism. Nanga Lauk Village Forest stores more than 130,000 tonnes of carbon in woody biomass, and if the area is not effectively managed by the Nanga Lauk community, deforestation and forest degradation are expected to generate considerable carbon dioxide (CO₂) emissions. The activities designed by the Nanga Lauk community will prevent deforestation and degradation in the Village Forest and preventing around 1,500 tonnes of CO₂e emissions per year from loss of trees, and considerably more than this from avoided emissions from peat drying.

F7. Verification

F7.1

(F7.1) Do you verify any forests information reported in your CDP disclosure?

In progress

F8. Barriers and challenges

F8.1

(F8.1) Describe the key barriers or challenges to eliminating deforestation and/or conversion of other natural ecosystems from your direct operations or from other parts of your value chain.

Forest risk commodity

Soy

Coverage

Supply chain

Other parts of the value chain

Primary barrier/challenge type

Cost of sustainably produced/certified products

Comment

Forest risk commodity

Soy

Coverage

Supply chain

Primary barrier/challenge type

Limited supply chain engagement

Comment

Forest risk commodity

Palm oil

Coverage

Supply chain

Primary barrier/challenge type

Supply chain complexity

Comment

While our suppliers are compliant with forest-related requirements, it is a challenge to map out the parent groups connected to our suppliers and ensuring the entire group is compliant. This is primarily due to the complexity of ownership and lack of direct commercial relationship with the group other than the specific subsidiaries we are purchasing from. It has also been a challenge to address smallholder land clearing outside companies' concession areas. This is especially so as it is a challenge to identify who is responsible as well as what is the intent of the clearing – whether it is for palm development or for other products - which impacts the engagement approach to addressing clearing outside concessions.

Forest risk commodity

Other - Cocoa

Coverage

Supply chain

Primary barrier/challenge type

Supply chain complexity

Comment

Cargill Cocoa & Chocolate purchases cocoa beans directly from farmers through farmer organizations, as well as through third parties. In 2018-2019, 43% of our cocoa is certified sustainable and 82% of our sustainable beans are sourced from our direct networks in West Africa. While we have established a good view on forest-related risks in our direct supply chain, more work is need to gain supply chain insights where we work with third-party suppliers.

F8.2

(F8.2) Describe the main measures that would improve your organization's ability to manage its exposure to deforestation and/or conversion of other natural ecosystems.

Forest risk commodity

Soy

Coverage

Other parts of the value chain

Main measure

Greater customer awareness

Comment

Forest risk commodity

Palm oil

Coverage

Supply chain

Main measure

Greater supplier awareness/engagement

Comment

Going forward, we will intensify our activities on the ground, taking a two-track approach to verify compliance in our supply chains through supplier engagement and improving practices across broader supply sheds through landscape-level programs. Our goal is to establish Cargill as the partner of choice and restore trust in the sustainability of palm oil. Transparency of our actions will be fundamental to restoring this trust. Reaching our goal will require us to tackle issues at scale. Actions include: Working with direct suppliers to verify their compliance with our policy and continue to support those who have not yet reached this milestone to be accountable to their action plans. We will work with them to better facilitate engagement of their supply chains to drive transformation, particularly at the fresh-fruit bunch dealer and smallholder levels, through tools and training.

Forest risk commodity

Other - Cocoa

Coverage

Other parts of the value chain

Main measure

Greater enforcement of regulations

Comment

□ Harmonized definitions and measurement methodologies of what constitute "forest" and "deforestation" □ Collaborative arrangements with (sub)national & landscapes initiatives, and support of stronger legal enforcement mechanisms. □ Industry standards that advance transparency and address common challenges

F17 Signoff

F-FI

(F-FI) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

F17.1

(F17.1) Provide the following information for the person that has signed off (approved) your CDP forests response.

	Job Title	Corresponding job category
Row 1	Chief Sustainability Officer	Chief Sustainability Officer (CSO)

SF. Supply chain module

SF0.1

(SF0.1) What is your organization's annual revenue for the reporting period?

	Annual revenue
Row 1	114600000000

SF0.2

(SF0.2) Do you have an ISIN for your organization that you are willing to share with CDP?

No

SF1.1

(SF1.1) In F6.3 you were asked "Have you adopted any third-party certification scheme(s) for your disclosed commodity(ies)? Indicate the volume and percentage of your certified production and/or consumption". Can you also indicate, for each of your disclosed commodity(ies), the percentage of certified volume sold to each requesting CDP supply chain member?

Please select

SF2.1

(SF2.1) Please propose any mutually beneficial forests-related projects you could collaborate on with specific CDP supply chain members.

SF2.2

(SF2.2) Have requests or initiatives by CDP supply chain members prompted your organization to take organizational-level action to reduce or remove deforestation/forest degradation from your operations or your supply chain?

Yes

SF2.2a

(SF2.2a) Specify the requesting CDP supply chain member(s) that have driven organizational-level action to reduce or remove deforestation/forest degradation from your operations or your supply chain and provide details on how.

SF3.1

(SF3.1) For your disclosed commodity(ies), do you estimate the GHG emission reductions and/or removals from land use and land use change that have occurred in your direct operations and/or supply chain?

Palm oil

Estimate GHG emissions and removals from land use and land use change

No, but plan to do so in the next two years

Please explain

Soy

Estimate GHG emissions and removals from land use and land use change

No, but plan to do so in the next two years

Please explain

Other - Cocoa

Estimate GHG emissions and removals from land use and land use change

No, but plan to do so in the next two years

Please explain

Submit your response

In which language are you submitting your response?

English

Please confirm how your response should be handled by CDP

	I am submitting to	Public or Non-Public Submission	Are you ready to submit the additional Supply Chain Questions?
I am submitting my response	Investors Customers	Public	Yes, submit Supply Chain Questions now

Please confirm below

I have read and accept the applicable Terms
