# **Cargill's Human Rights and Environmental Grievance Process**

#### 1. Background

Cargill commits to working with parties to resolve complaints and conflicts in its own operations and supply chain through an open, accessible, transparent and consultative process. Under our grievance framework, when internal or external stakeholders raise concerns about sustainability, human rights, or environmental practices (relating to Cargill or our suppliers or business partners), we will deploy a holistic grievance approach to address those concerns in a timely, transparent, equitable and participatory manner. Implementing an effective grievance mechanism is a part of being a responsible global citizen, in line with our Cargill Code of Conduct & Guiding Principles, Cargill Human Rights Policy, Cargill Supplier Code of Conduct and Corporate Due Diligence Policy. Cargill will continue to consult with stakeholders and potentially affected rightsholders and review its grievance process on a regular basis to ensure effectiveness, in line with the United Nations Guiding Principles on Business and Human Rights (UNGP).

## 2. Objectives

Cargill's human rights and environmental grievance process serves as a guide to ensure that grievances are received, addressed, solved, and monitored across Cargill's supply chains and own operations. It aims to provide a clear, predictable, and effective course of action. The complaints procedure enables persons to report human rights and environmental risks related to Cargill's own business operations, or those of a Cargill supplier or other business partner.

It is our goal to build trust-based relationships with ethical suppliers and business partners who comply with our Supplier Code of Conduct. We engage and support our suppliers and business partners in addressing non-compliances through time-bound action plans. If a supplier or business partner refuses to engage in this grievance process or subsequent remediation process in good faith, Cargill will reserve the right to cease business relations with them.

## 3. Scope

This process covers human rights and environmental grievances related to Cargill's own operations and all products and services Cargill procures. It applies to all suppliers and business partners in Cargill's supply chain, direct and indirect. A "Supplier" is defined as a person or business that provides a product or service to Cargill. This includes, but is not restricted to, direct suppliers, indirect suppliers, cooperatives, warehouses, transportation companies, third party contracting entities, etc.

A "grievance" is a complaint or concern, associated with Cargill's business, which an individual or a group seeks to address with Cargill. Grievances will be managed through Cargill's Ethics Open Line system.

Please note that grievances related to Cargill plantations may be addressed through a local, culturally appropriate grievance procedure, unless a community or their representative has opted to follow this mechanism.

#### 4. Process

Cargill has a long-standing Ethics Open Line accessible through the web and by telephone, hosted by a third party (Navex Global) on a secure and independent site. The Ethics Open Line is confidential and available 24 hours a day, 7 days a week in multiple languages. It provides mechanisms for anonymous reporting and gives people tools to respond to follow-up questions.

Cargill's overall approach includes recording grievances, verifying claims, addressing confirmed issues, delivering responses to stakeholders, managing and monitoring follow-up actions, and reporting key performance indicators to stakeholders.

When a report regarding a third-party supplier is submitted to Cargill, we will engage the grievance raiser and the grievance subject (if and as appropriate) to discuss the issues raised. This will be done in accordance with this process, with the objective of evaluating the matters raised and to find the best ways to address them.

#### 5. Grievance-Raising Procedure

Anyone can submit a grievance through <u>Cargill's Ethics Open Line</u>. This can be done by scanning a QR code on a mobile device, completing an on-line form, or calling a country-specific phone number.



We strongly recommend utilizing Cargill's Ethics Open Line to ensure that a grievance is timely considered and addressed. We take reports of potential misconduct seriously, and we handle investigations promptly, fairly, and as confidentially as possible.

Grievances shared with Cargill in any other way (e.g., through social media, email, letter, or otherwise) should be routed by the grievance recipient through the Ethics Open Line.

A person reporting a grievance may remain anonymous or appoint a third-party to act as their agent and assist them in articulating their grievance.

It is our preference that persons raising grievances identify themselves, so we can follow up with questions or ask for additional information or clarification, if necessary.

Cargill will acknowledge receipt of a grievance. When appropriate, the persons entrusted with the implementation of this procedure will discuss the facts with the grievance raiser and will notify them when the grievance investigation has been completed. Critical and high-risk allegations will proceed through a grievance panel process. Medium and low-risk allegations will be investigated and reported. See section 6.

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

#### 6. Grievance Procedure Process Flow



## 7. References

This Grievance Process is based on and in alignment with the following guidelines:

- a) Cargill Code of Conduct & Guiding Principles
- b) Cargill Supplier Code of Conduct
- c) Cargill Policy on Forests
- d) Cargill Human Rights Policy
- e) Corporate Due Diligence Policy

