Responsible Business



OUR APPROACH

Cargill's stakeholders count on us to uphold high ethical standards across our business practices, decision-making, and culture. Through our policies, programs, training, and due diligence, we aim to communicate clear expectations, strengthen transparency, support accountability, and build trust with our stakeholders.

"Ethics and compliance are core to how we do business at Cargill. Our values guide the choices we make, especially when the path is hard. We speak up, ask questions, and win the right way. That is how we earn trust and nourish the world safely, responsibly, and sustainably."

Rishi Varma
Executive Vice President, Chief Legal, Compliance and Corporate Affairs Officer and Corporate Secretary
Cargill

Ethics and compliance

Our shared ethical standards guide us when we face ethical dilemmas, and our strong focus on compliance drives our business conduct throughout the world. Our ethical approach is grounded in our **Code of Conduct**, which includes our **Guiding Principles** and references our key compliance policies. The Code applies to all employees worldwide, as well as anyone acting on behalf of Cargill. Reviewed annually, Cargill has had a written Code of Conduct since 2012. Our suppliers are expected to uphold the same principles, as outlined in our **Supplier Code of Conduct**.

If someone has a concern about the behavior of a Cargill employee or a person representing Cargill, we want them to speak up. Our **Ethics Open Line** is available 24 hours a day, seven days a week worldwide, for confidential reporting. **Learn more about ethics and compliance at Cargill**.

Cargill's ethics and compliance framework

Equipping employees with the knowledge of how to apply ethics, maintain compliance, and practice sound judgment in their daily work strengthens responsible decision-making. At Cargill, we share our ethical standards and compliance focus with employees through training, communications, conversations, and global events.

New employees take online Code of Conduct training within their first three months, and current employees are assigned refresher training on an annual basis. In-person training is provided by ethics and compliance professionals and covers topics including anti-bribery, anti-fraud, and conflicts of interest, as well as respect in the workplace and the value of speaking up.

As part of Cargill's commitment to conducting business free from corruption and promoting awareness of anti-corruption laws, our anti-bribery program focuses on third-party due diligence, gifts and entertainment, and government donations. Our anti-fraud program focuses on other types of corruption including financial misstatement fraud and asset misappropriation.

Throughout the year, our internal communication channels promote conversations on ethical dilemmas and internal case studies that share examples of sound business judgment.

In March 2026, during our sixth annual Ethics Week, employees around the world participated in discussions and activities focused on ethical decision-making, accountability, and the role each person plays in maintaining trust. Over 57,000 employees viewed more than 500 Ethics Week social media posts on our internal social media channel, reflecting broad participation across regions and businesses.



Responsible AI

As new technologies shape how we work and serve customers, responsible business practices are central to how Cargill explores, tests, and deploys artificial intelligence (AI). At Cargill, we are applying AI in targeted ways to support food security, improve productivity, accelerate research and development, and create products and solutions that better serve our customers. We are also using AI to streamline internal processes, help our teams make more informed business decisions, and create measurable value throughout our global operations. For example, we are exploring ways AI can help create a more connected customer experience by linking customer needs with relevant products, services, and capabilities from across Cargill's broader portfolio.

AI technologies are evolving rapidly; we are continuing to strengthen our governance, processes, and controls to support responsible, ethical, and effective AI use. We have established internal guidelines for the responsible use of AI within our company, including an AI Governance Council, policies, and programs designed to support responsible AI practices, human oversight, and appropriate safeguards. This includes a risk-based approach intended to help manage evolving regulatory, security, privacy, and operational considerations. Our oversight helps guide Cargill's use of AI in ways that align with our values, ethics, business interests, and applicable laws and regulations.

Recognition for AI-enabled innovation

As we develop and scale AI-enabled solutions that aim to strengthen the food system and support our customers, our work has received external recognition. The Business Intelligence Group (BIG) named Cargill **a winner in the 2026 BIG AI Awards** for work applying AI across the global food and agriculture system. We also received a **2026 Edison Award** that recognized, in part, AI-enabled innovation in our meat business.

Responsible sourcing

Responsible sourcing at Cargill entails risk-based due diligence and supplier engagement in priority areas of the business. Through these processes, we assess whether products and raw materials Cargill purchases are produced, traded, and delivered in a manner consistent with Cargill's supplier expectations.

Key policies and processes supporting this approach include:

- Our **Supplier Code of Conduct**, established in 2018, sets mandatory human rights and environmental expectations for all suppliers, including Cargill's right to conduct due diligence to assess compliance. The code is incorporated into supplier contracts and vendor agreements, and referenced in supplier questionnaires.
- Our **Human Rights and Environmental Due Diligence Policy**, formalized in 2023, outlines Cargill's process for identifying and addressing human rights and environmental risks within our own operations, supply chains, and business relationships.
- Our **Human Rights Policy**, established in 2020, outlines Cargill's commitment to respecting internationally recognized human rights across our operations and supply chains. We expect our suppliers and business partners to uphold these principles and adopt similar practices.
- Our **Human Rights and Environmental Grievance Process**, updated in 2026 to support greater harmonization and efficiency across Cargill businesses, provides a framework for internal and external stakeholders to raise concerns about human rights or environmental issues related to Cargill or our suppliers. This process aims to ensure that complaints are received, addressed, and monitored across our operations and supply chains, with grievance panels reviewing high-risk concerns and establishing time-bound action plans when needed.
- Our global **Animal Welfare Policy**, established in 2025, outlines our expectations for those working in our operations and supply chains. Cargill does not tolerate abusive behavior directed at animals by employees, suppliers, transporters, or others in our supply chains.



Photo credit: Nuning Maryati

Our four-step due diligence process

Cargill's Human Rights and Environmental Due Diligence process involves a four-step approach intended to identify and assess, act, track, and report human rights and environmental risks.

In prioritized regions and supply chains, we begin by identifying risks tied to geography, commodity, and industry. Based on that analysis, we conduct deeper assessments to evaluate specific supplier and operational risks. These results inform how we develop action plans with suppliers, address potential issues in our own operations, define preventative strategies, and maintain high standards of safety, sustainability, and compliance.

We continuously enhance our approach to meet evolving expectations, working closely with suppliers, customers, and partners to strengthen responsible practices, raise standards, and build supplier capabilities.



Human Rights and Environmental Due Diligence process

Our four-step process helps us to identify and address adverse impacts where they occur, and to mitigate or remediate those we may have caused or contributed to in some way.

1	2	3	4
Identify and Assess We screen our operations and supply chains to identify potential and actual adverse impacts.	**Act** When adverse human rights or environmental impacts are identified, we implement time-bound action plans to prevent, mitigate, and/or remediate those risks.	**Track** We measure the implementation of action plans to track deployment and effectiveness on addressing risk issues.	**Report and improve** We communicate our progress, evaluate outcomes, and use insights to continuously strengthen our approach.
Risk screening by geography, commodity, and sector	**Targeted supplier engagement and trainings**	**Monitor key performance indicators**	**Public reporting and stakeholder updates**
Review of data	**Corrective action plans and follow-up**	**Follow-up assessments and audits**	**Lessons learned to enable continuous improvement**
Supplier and site assessments	**Grievance resolution**	**Evaluate effectiveness and adapt**	**Regular review of due diligence process**

Continuous improvement

Governance enablers

These activities support every stage of our due diligence process:

- **Customer needs, external regulations, and industry standards**
- **Cross-functional governance and accountability**
- **Stakeholder engagement**
- **Data analysis, transparent reporting, and continuous monitoring**

We integrate a variety of tools to assist us in our due diligence, which may include the use of satellite imagery, platform analytics, partnerships with our supplier partners to conduct on-site visits, certifications, grievances reported via our Ethics Open Line, and information from third party sources — including governmental authorities, international nongovernmental organizations (NGOs), and consulting experts.

Protecting animal welfare

At Cargill, we support the welfare of animals[33] throughout our operations by embracing established animal science, responsible husbandry practices, and recognized industry standards. Our philosophy is based on the **Five Domains model** for assessing animal welfare, which considers nutrition, physical environment, health, behavioral interactions, and overall mental state. This includes collaborating with farmers and ranchers, customers, NGOs, academics, scientists, and veterinarians to promote best practices in animal welfare.

Our work includes using our animal welfare expertise and supply chain reach to support our customers in advancing their own animal welfare goals. For example, as a supplier of poultry in North America, Asia, and Europe, we have worked with our contract chicken growers to modernize lighting and provide behavioral enrichments in the animals' environments.

In Canada, this included partnering with Conestoga College and Cascades packaging company to design innovative new perching and sheltering structures in poultry barns. Students created a variety of compostable cardboard structures that were tested in our growers' barns. Selected designs will be incorporated into our customers' supply chains, to complement our current enrichment program as needed, and provide birds with additional opportunities to express natural behaviors like roosting and sheltering.[34]

Learn more about Cargill's **animal welfare programs**.



Advancing food safety

Cargill's food safety approach is grounded in rigorous, science-based standards and regulatory compliance, with processes designed to help identify and manage potential risks and deliver safe, high-quality products for customers and consumers.

Our strategy centers on standardizing, automating, and modernizing food safety, quality, and regulatory processes. This work is designed to improve compliance, reduce incidents, and strengthen how we identify and manage risk.

We use innovative tools to simplify operations and support more timely decision-making. For example, the Cargill™ Hazard Alert System is a data-driven tool that uses multiple datasets to detect emerging risks and support earlier action on potential product safety concerns.

We also engage with industry partners to share relevant practices and insights from our tools and systems, supporting continued improvement in food safety across the sector.

What does food safety look like

[33] Animal: farmed animals, excluding insects.

[34] We acknowledge the support of the Natural Sciences and Engineering Research Council of Canada (NSERC).