



Cargill



**Cargill's Code
of Conduct**

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Cargill's Code of Conduct

Our Code of Conduct helps us fulfill our purpose as a company, guided by our shared values.
Our Code is a reflection of who we are and how we act every day.

We use our Code as a guide to live out our values—making a positive impact on our people,
our customers, our business partners, our company and our communities.

In sum, we live with an inspired purpose, building trust by always doing the right thing.

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CARGILL'S CODE AND YOU

A Message from the CEO

Dear colleagues:

One of the best parts of my job is meeting our teams around the world. In our conversations, I've often felt your pride in Cargill's commitment to doing the right thing. I share that pride with you.

Since Cargill's founding, we've been clear with our customers, suppliers and communities that "our word is just as good as our bond." The ethics we share and the actions we take in our work are our collective commitment to Cargill's Guiding Principles. We have kept this solemn promise for nearly 160 years. And keeping that promise earns the trust of our partners every day.

Maintaining that trust has never been more important. Customers and consumers take our lead to meet ever higher standards of responsibility for sustainable supply chains. We're navigating a volatile marketplace, ever-changing regulatory environments and global disruptions. This requires an even steadier hand and an unwavering commitment to responsible decision-making.

On the Cargill team, you play a key role in helping us meet these goals. As you do, use our Code of Conduct as your guide to Cargill's policies and legal requirements. It also outlines our expectations of you for ethical and responsible behavior. We use our Code and our own good judgment to live up to our responsibility to Cargill's high ethical standards and values. And if any of us feels that something isn't right, we share a duty to speak up. We do not retaliate against anyone for reporting misconduct in good faith.

Please review our Code carefully and use it as a resource to work responsibly and with integrity every day. Together, we'll keep our promises to our partners. And in doing so, we'll maintain our reputation as a leader that nourishes the world safely, responsibly and sustainably.

Brian Sikes
President and CEO

"The policy on which our business has always been conducted is...our word is just as good as our bond."

—John MacMillan, Sr., 1923

OUR CODE

About Cargill's Code of Conduct

Why do we have a Code?

Cargill's Code of Conduct outlines our ethical standards for business conduct wherever we operate. It's your guide to answer questions and resolve ethical dilemmas.

Our Code has 7 Guiding Principles. They express Cargill's core values and ethics. Use them to guide your actions and decision-making on our behalf. The Code also summarizes key compliance policies. It highlights the key legal and ethical issues and provides guidelines for appropriate conduct.

Who must follow our Code?

Our Code applies to all employees of Cargill, its affiliated companies and to members of our Board of Directors when acting on behalf of Cargill. Our Code cannot be waived unless the General Counsel or Board of Directors approves such a waiver.

What does the Code require of me?

As employees of Cargill, we must follow our Code by making decisions consistent with it. We must speak up if we have any concerns and report any Code violations that we discover or experience. Disciplinary action will also apply for the failure to report Code violations or refusing to participate with an investigation.

What does the Code require from managers?





Managers set the tone for their teams. They are often the first people employees will turn to with questions. As a result, we expect managers to:

- Set a strong example of ethical conduct
- Provide support to employees in complying with the Code of Conduct and compliance policies
- Encourage employees to speak up when they have questions or concerns.
- Appropriately address misconduct

Q I manage a team, but sometimes lack the time and resources to promote our Code. What can I do?

A *You can model the Code in your behavior and actions. This promotes the Code without requiring extra time or resources. Have an "open door" that invites your team to discuss concerns. Convey and model our zero tolerance for retaliation and tell your team about the resources available to help them follow our Code. If you have questions or doubts, please reach out to your manager or the Ethics and Compliance Office.*

Cargill's Guiding Principles

-  We obey the law.
-  We conduct our business with integrity.
-  We keep accurate and honest records.
-  We honor our business obligations.
-  We treat people with dignity and respect.
-  We protect Cargill's information, assets and interests.
-  We are committed to being a responsible global citizen.



“Doing the right thing is clearly embedded in Cargill’s culture. We all can support this culture through thoughtful decision-making and building a strong compliance foundation that equals our ethical spirit. Together, our ethics and compliance define us, and will be a key factor in our vision to become the most trusted partner in agriculture, food and nutrition.”

— Anna Richo, General Counsel and Chief Compliance Officer

Our Ethical Culture



Since our founding in 1865, Cargill has acted on the belief that doing the right thing sets the foundation for long-term success.

We work to foster a culture of respect and cooperation, focusing on shared ethical standards and strong compliance programs that enable our customers to succeed and our communities to thrive.

Our shared ethical standards along with our corporate values shape our decisions and behaviors at all levels of the organization.

Good decisions through discussion

Does my decision comply with our Code, our policies and applicable law?

YES NO

Is my decision consistent with our Guiding Principles?

YES NO

Would I be okay with everyone knowing about my decision?

YES NO

If you can answer "YES" to each of these questions, then you are probably on the right course.

If you are not sure the answer is "YES" or think the answer might be "NO," then you should seek guidance from your manager or one of the other resources listed in our Code.

Our Duty to Speak Up

What should I do if I discover or suspect misconduct?

Even the most ethical companies can have conduct issues; it's how we deal with those issues that will flag our commitment to our Guiding Principles and set us apart from other companies.

Reporting misconduct takes courage, but it's the right thing to do. Cargill will not tolerate retaliation against anyone who, in good faith, raises a concern, reports misconduct or participates in an investigation.

Where should I start?

Talk to your manager. If you're not comfortable doing so, or if your manager doesn't respond appropriately, reach out to any of the following:

- Your Human Resources Manager
- Your Business or Function Leader
- The Ethics and Compliance Office at ethics@Cargill.com

You may also submit a confidential report via Cargill's [Ethics Open Line](#). It's available 24 hours a day, 7 days a week for employees anywhere in the world, and depending on the country in which you reside, you can choose to report anonymously.

How will Cargill respond?

Cargill will investigate any reports fairly and appropriately. We will take all necessary steps to address any violations of our Code or our policies.

We do not tolerate any retaliation against someone who makes a report in good faith about a concern, or who cooperates or participates in any investigation. If you experience or discover retaliation, either in person or online, please report it to your manager or any of the above Speak Up resources. Review Cargill's [Anti-Retaliation Policy](#) for guidance.

Q One of my employees is raising concerns about a new law that applies to our operations. He suspects that not everyone on the team is following the law appropriately. I question his conclusions, however. What should I do?

A *Even if you have doubts, take the report seriously. Thank the employee for speaking up and listen attentively to his concerns. Ask clarifying questions. Take good notes and forward his concerns to the Ethics and Compliance Office, along with your own assessment. Keep in mind that you should not conduct your own investigation into the matter; contact the Ethics and Compliance Office for assistance.*

OUR ETHICAL/LEGAL RESPONSIBILITIES

We Obey the Law

Obeying the law is the foundation on which our reputation and Guiding Principles are built. As a global organization privileged to do business all over the world, we have the responsibility to comply with all of the laws that apply to our businesses.



Obeying Applicable Laws

Cargill conducts business globally, and our employees come from a variety of countries. As a result, the laws of many different jurisdictions apply to our business operations. Some laws extend beyond a specific country's borders. For instance, certain U.S. laws concerning imports and exports, bribery and trade sanctions apply not only to our U.S. operations, but to our operations around the globe. We must comply with all of the laws that apply to our businesses. At times, the law that applies to our business activities may be unclear. If you have any questions or concerns about the law, please contact the Law Department.

Q I saw on the news that my locality passed a new law on food safety. No one has said anything about it at work, but I wonder if it applies to my job in any way? If it's not in the Code, do I need to follow it?

A *If it applies to your work, you will need to follow it—even if it is not in the Code. Raise your concerns about the law with your manager or the Law Department.*

WE OBEY THE LAW

Third Parties and Legal Conduct

Assisting a third party in illegal activities can damage our reputation and result in serious legal action against both you and Cargill. This can include fines and claims for damages from us. In addition to obeying the laws that apply directly to us, we must not take actions which we know, or ought to know, will help a third party break the law. Do not ignore signs that a third party is using Cargill to help them do something illegal. If you have any concerns that a third party with whom you are doing business is using Cargill in that way, report it to the Law Department.

-
- Q** We have been working with a new supplier. Based on a few conversations, I have concerns that they might be doing business on our behalf in a country that is subject to economic sanctions. What should I do?
- A** *Raise your concern with your manager or the Ethics and Compliance Office, as we strive to work with third parties who comply with the law.*



We Conduct Our Business with Integrity

We take pride in conducting our business with integrity. We compete vigorously but do so fairly and ethically. We do not offer or accept bribes or inappropriate gifts, and we comply with the laws and regulations that support fair competition and integrity in the marketplace.

Anti-Bribery

We never offer, accept or receive bribes, kickbacks or other corrupt payments to or from others, including government officials. We ensure that we understand and strictly follow all applicable anti-bribery and anti-corruption laws, including when we interact with government officials. We carefully select and interact with third parties (such as sales agents, representatives, consultants and distributors) who act on our behalf, and we speak up about any bribery misconduct. We also adhere to our Anti-Bribery Due Diligence Procedure when hiring or retaining high risk vendors (who interact with a government official on our behalf or who were recommended to us by a government official) located in and/or providing services in Latin America, Africa, Asia-Pacific, the Middle East or Eastern Europe.

Bribery is against our Code and many international laws. By complying with our Code's anti-bribery and corruption requirements, we adhere to the law and protect our long-standing ethical reputation. Review Cargill's [Anti-Bribery Policy](#) and [Anti-Bribery Due Diligence Procedure](#) for guidance.



What is a bribe?

A bribe is giving or offering to give anything of value to someone in exchange for influencing business decision-making (such as getting or keeping business), for any other business advantage or to receive a benefit.

What is “anything of value”?

Things of value include gifts, cash, donations, favors, a job offer or anything else that could be valuable to the recipient.

Who is a “government official”?

A government official includes employees of a government agency or a government-controlled company or organization, a politician or political party, or an employee of an international organization such as the World Bank.

WE CONDUCT OUR BUSINESS WITH INTEGRITY

Business Gifts and Entertainment

Used correctly, gifts and entertainment can promote goodwill and reinforce strong business relationships. In some cultures, gifts may be customary and expected. However, because gifts and entertainment carry value for the recipient, consider them carefully. We must avoid situations in which they might influence or appear to influence your decision-making or someone else's. Review Cargill's [Gifts and Entertainment Policy](#) for guidance.

Do not offer or accept any gifts or entertainment that:

- Are extravagant, illegal or unreasonable under local custom of the giver or receiver
- Coincide with significant decisions affecting Cargill that could appear to improperly influence them
- Are in the form of cash or cash equivalents such as gift cards, gift certificates or vouchers
- Would cause embarrassment to Cargill or prompt questions about Cargill's integrity



Q After having had lunch with a distributor representative, I received a high-end wristwatch in the mail. It had a note from the distributor that said, "For all you do!" There are no upcoming business decisions concerning this distributor. May I keep the wristwatch?

A *No. The cost of the wristwatch would likely be considered "extravagant." Report it to your manager or the Ethics and Compliance Office. Even though there are no upcoming decisions concerning the distributor, the gift's cost alone makes it inappropriate. The wristwatch may give the appearance of undue influence on your future decisions with the distributor.*

WE CONDUCT OUR BUSINESS WITH INTEGRITY

Fair Competition

We protect customers and the marketplace by complying with fair competition and antitrust laws. These laws encourage free and open competition in the marketplace. They ensure customers have an opportunity to purchase good quality products and services from a variety of sources at lower prices.

Fair competition and antitrust laws are complex and vary by country. But they generally prohibit competitors from working together to limit competition in commercial or labor markets. They also prohibit improper attempts to monopolize markets or control prices.

We expect all employees to follow our Code and [Competition Policy](#). We must interact with competitors carefully. This is especially true during trade association meetings and events and benchmarking initiatives.

Q I was approached by an employee of a competitor at a conference. We started chatting about a talk that had just been given. Then she brought up a new product her company was launching. Should I continue the conversation?

A *No. It's best to keep any business conversation with a competitor at a minimum. You're likely to drift into topics that could violate competition law or trade secrets. In either case, it's dangerous territory.*



What is a trade association?

A trade association is specific to a commercial industry and presents opportunities for members to engage, intentionally or unintentionally, in anticompetitive discussions and activities. Use Cargill's Trade Association Membership App to obtain approval and guidance from the Group Lead Lawyer before joining one.

We comply with fair competition and antitrust laws concerning the proper collection and use of competitive intelligence. When obtaining competitive intelligence, we never engage in:

- Fraud
- Misrepresentation
- Trespassing
- Other illegal or unethical methods

Complying with these laws has helped us prosper and grow over the years—we don't need to take shortcuts to succeed.

Review Cargill's [Competition Policy](#) and the [Principles of Competition Law Guide](#) for further guidance.

WE CONDUCT OUR BUSINESS WITH INTEGRITY



Third Party Intellectual Property

We respect the intellectual property rights of individuals and companies outside of Cargill. We do not attempt to obtain their confidential information or otherwise use their intellectual property inappropriately.



What is intellectual property?

Intellectual property includes trademarks, copyrights, patents and trade secrets. In some contexts, trade secrets are also known as confidential information or know-how.

If you have received confidential information that doesn't belong to Cargill, or if you may be using another's intellectual property without having the rights to do so, report it to the Law Department.

You must also comply with all contractual commitments and restrictions regarding the use of the intellectual property of our customers and business partners.

WE CONDUCT OUR BUSINESS WITH INTEGRITY

Trade Sanctions

Numerous countries and organizations, such as the United Nations, impose trade sanctions. They may be against certain countries, organizations, entities or individuals. Many trade sanctions apply to transactions done outside the borders of the country imposing the sanction.

Some trade sanctions ban all transactions with a particular country. Others may ban only certain types of transactions, such as trading in specific goods or services. Review Cargill's [Trade Sanctions Policy](#) for guidance.

Cargill does not do business with any sanctioned country, entity or individual, unless permitted by law. If your work involves an international transaction or other business that has the potential of violating a sanction, you must:

- Familiarize yourself and comply with any applicable sanctions
- Avoid doing business with any sanctioned country, entity or individual, unless permitted by law
- Consult with the Law Department before you even consider any business with a sanctioned country, entity or individual

Trade sanction laws are complex and change frequently and rapidly for foreign policy purposes. So, a transaction that was allowed before might be illegal now. Consult the Law Department and available online resources regularly.



Q We're considering doing business in a country that we did a lot of business with a few years ago but not recently. Do we still need to check to see if any sanctions apply?

A *Absolutely. The law on trade sanctions changes frequently. A country that did not have restrictions before may be subject to restrictions now. The consequences are serious if we violate them. Check online resources and reach out to the Law Department for help.*

OUR CUSTOMERS' TRUST

We Keep Accurate and Honest Records

Accurate and honest records are critical to making sound business decisions and maintaining the integrity of our financial reporting. Our business information, in whatever form, must reflect the true nature of our transactions.

Creating and Managing Business Records

Every day, we create thousands of business records. These vary from customer contracts and reports for regulatory agencies, to timesheets and expense reports. At times, our email and telephone communications become business records. We count on their accuracy, completeness and truth to analyze and report on our operations and to make sound business decisions. Any business record could become public through litigation, a government investigation or a media inquiry.

For these reasons, all business records we create, in whatever form, must reflect the true nature of transactions and events. Never falsify a record or try to disguise what really happened. Avoid exaggeration, colorful language and legal conclusions in all your communications.

Under normal circumstances, we follow our records retention schedules when deciding which records to keep and which to dispose of. But there may be exceptions to this schedule, such as litigation or a government investigation. So, be sure to ask if in doubt and follow any instructions you receive.



Q I am cleaning my office space and see a box of paperwork that is due for shredding according to our record retention policy. But I just heard there is a pending client matter at my workplace. What should I do?

A *Don't send the box for shredding. Consult with the Law Department to see if any of the documents inside should be kept because of the client matter.*

WE KEEP ACCURATE AND HONEST RECORDS



Financial Statements and Controls

We use our financial statements to prepare government returns and reports for tax, regulatory and statistical purposes. We comply with applicable accounting rules when compiling and sharing our financial information. We prepare and file our tax returns and other filings in accordance with all tax laws.

If your job involves supplying financial information to the controllership organization or the Tax Department, you must ensure it is timely. You must also certify both the accuracy of the information and your compliance with Cargill policies. Failure to provide timely and accurate information in these cases can result in significant legal and commercial risk for Cargill. Contact the Tax Department for tax-related questions and your controllership resource for finance-related questions. Review Cargill's [Financial Statement Controls Policy](#) for guidance.

We Honor Our Business Obligations

Our business relationships are grounded in mutual trust and have been throughout Cargill's history. We build and maintain the trust and confidence of our customers and other business partners by communicating honestly, respecting information entrusted to us and standing behind our commitments.







WE HONOR OUR BUSINESS OBLIGATIONS

Trust in Business Relationships

Honoring our obligations to our customers and business partners goes beyond just meeting our contractual responsibilities. The mutual trust we have in our business relationships with customers, suppliers, vendors, consultants, other business partners and one another means something much more.

Maintaining the mutual trust of our business relationships requires that we:

- 
Communicate honestly
 We communicate honestly about our products and services. This includes our conversations, contracts, sales materials, emails and all other communications.
- 
Source responsibly
 We work with suppliers whose values align with our own and we expect our suppliers to follow our Supplier Code of Conduct.
- 
Make commitments we can fulfill
 A commitment means **any** promise, not just those in our contracts. Don't overpromise and commit to something that Cargill can't deliver.
- 
And handle changes to commitments responsibly
 If we won't be able to meet a commitment we have made, work with the affected customer or business partner to find a solution and discuss appropriate next steps. Make sure existing contracts are properly changed (amended) or terminated, if needed.

- 
Respect and protect confidentiality and ownership rights
 We protect intellectual property entrusted to us as diligently as we protect our own.
- 
Treat personal information with care
 We may collect, hold or process personal information of our customers, suppliers, digital application users or others outside of Cargill. If you handle such information, make sure it is protected and used lawfully and properly. Review Cargill's [Data Privacy for Business Information Policy](#) for guidance.

Q I can tell from our plan that we are going to be late on a deliverable. What should I do?

A *Tell the affected customer or business partner right away. No one wants to miss a deadline, but it's worse when the delay is not managed properly. Do what you can to reduce the impact of the delay. Keep in mind that changes to the contract may be necessary.*

WE HONOR OUR BUSINESS OBLIGATIONS

Government Contracting

We conduct business with government entities. These may include national, state, provincial and local ones. The laws and requirements for our contracts with governments are typically much stricter than those for our contracts with commercial customers.

For instance, offering any gifts to government officials, even ones of minimal value, is often prohibited entirely. Disclosing detailed information about our company and shareholders under these contracts may be necessary, too. And basic sales-related communications may be regulated when government officials are involved.

If you work on government contracts, make sure you:

- Fully understand the special legal rules and contract terms that apply to that customer relationship
- Know which contract requirements apply to third parties, like consultants, resellers, distributors or suppliers
- Know the third party is aware of the requirements and can meet them



Q I'm assigning one of my teams a project that involves a government contractor. The team is one of my most experienced. But they have never worked with government contractors, only companies in the private sector. Are there extra precautions I need to take?

A *Absolutely. Government contracts have a lot of special requirements that other contracts do not. Get the Law Department involved and ensure that the team and any third parties you may be working with know about the rules that apply to the contract. Specific disclosures may be required. Government contracts also typically have rules around sales, gifts and bribery that are more rigid than those that apply to private-sector relationships.*

OUR PEOPLE

We Treat Our Employees with Dignity and Respect

We achieve our goals through our people. We provide a safe workplace and value the unique contributions of our global team, enabling those who support Cargill's goals to achieve their own individual potential. We are committed to respecting the human rights of Cargill employees and all those whose livelihoods we touch.

Health and Safety

We believe all jobs can be done safely. Workplaces with zero injuries and fatalities are possible. Ensuring everyone returns home safely from work every day is core to our operations. We expect an unwavering commitment to these goals from all Cargill leaders, employees and contractors.

This commitment requires that we:

- Comply with all health and safety laws
- Comply with our own safety requirements that often go beyond the legal ones
- Continuously improve our safety performance through learning from others, both inside and outside our organization
- Establish aggressive safety goals
- Recognize people for improving safety processes
- Insist on a culture that requires all work, however urgent, be done safely



All employees must follow health and safety laws and company requirements that apply to their jobs. Take precautions to protect yourself, your fellow employees and visitors. Report any incidents, unsafe practices or security issues you witness to your manager. Cargill managers must ensure that everyone they supervise receives training, programs and resources to do their jobs safely. They must also ensure that the design and processes of our facilities enable safe working conditions.

Review Cargill's [Environment, Health and Safety Policy](#) and the Cargill EHS Policy Manual for guidance.

WE TREAT OUR EMPLOYEES WITH DIGNITY AND RESPECT

Human Rights

Our commitment to human rights is fundamental to our Guiding Principles. Respecting these rights aligns with our values of doing the right thing and putting people first. Our [Human Rights Policy](#) ensures that we:

- Conduct our business activities while keeping in mind the health and safety of those whose lives we touch
- Respect the rights of workers to form or join a legally recognized labor organization, if they choose, without fear of reprisal, intimidation or harassment
- Treat all workers with dignity and respect, and provide an emotionally and psychologically safe and inclusive working environment
- Provide competitive, fair and equitable pay, which includes a living wage that supports our employees and their families
- Comply with applicable working hours laws, including overtime hours
- Act to eliminate any form of forced labor—and work to eradicate child labor—from our own operations and supply chains
- Respect land resources and tenure rights for everyone, especially for Indigenous people, local communities and ethnic or minority groups



WE TREAT OUR EMPLOYEES WITH DIGNITY AND RESPECT



Strength Through Diversity

Cargill embraces the variety of backgrounds and life experiences our employees bring to work. Our workforce offers the perspectives of a lot of different social groups. They include genders, languages, local customs, physical abilities, races, religions, sexual orientations, gender identities, life experiences and socio-economic statuses. We also vary in our personal styles of thinking, expressing ourselves and problem-solving.

As a vital part of being a successful and effective global organization, we:

- Respect the diversity of humanity
- Accept our differences
- Recognize that our own way of thinking is not the only way

- Acknowledge that the diverse viewpoints that result from varied backgrounds are not weaknesses but are in fact strengths
- Serve the needs of our global organization and diverse customer base

We provide equal employment opportunities to all existing and prospective employees. This means we make our employment decisions without regard to personal characteristics, such as race, ethnicity, color, gender, age, disability or other characteristics protected by law. Illegal discrimination and retaliation against anyone for either sharing a concern, reporting misconduct, or participating in an investigation are not tolerated at Cargill. This applies to the way we treat each other, our customers, and anyone with whom we interact or do business.

Review Cargill's [Global Anti-Discrimination Policy](#) and the anti-discrimination/equal employment opportunity policies at your location for guidance.

Q I supervise an employee who recently converted to another religion. We used to belong to the same congregation, and I don't agree with her decision. She is asking for time off for religious observance. What are my obligations here?

A *You have an obligation to provide reasonable accommodation for religious observance. It would be an abuse of your discretion to discriminate or harass her in any way because you don't agree with her decision to convert. We respect each other's religious choices, even if they contrast with our own.*

WE TREAT OUR EMPLOYEES WITH DIGNITY AND RESPECT

Harassment

We do not tolerate harassment in any form. This applies to how we treat each other, our customers, and anyone with whom we interact or do business. We conduct ourselves in a manner consistent with our values of putting people first and doing the right thing, and we adhere to applicable laws. Review Cargill's [Global Anti-Harassment Policy](#) for guidance.

If you experience or see harassment, report it immediately to a manager or Human Resources. You may also submit a confidential report to MyHR or the [Ethics Open Line](#).

Q I started working on a new team and immediately noticed that a co-worker tells sexual jokes and uses sexual gestures in the workplace. The co-worker just came up and rubbed my back and made me feel very uncomfortable. What should I do?

A *These behaviors are unacceptable and may also constitute sexual harassment, which is prohibited by Cargill's policies. You should report these behaviors to your manager or Human Resources, or by submitting a ticket request through MyHR or an Ethics Open Line report.*



What is harassment?

Harassment is unwelcome conduct that creates an intimidating, hostile or offensive environment by targeting a personal characteristic that is protected by law, such as race, gender, disability and the like. This can be physical, verbal (such as insults, jokes and offensive remarks), written, electronic or online/social media behavior.

What is sexual harassment?

Examples of sexual harassment may include:

- Inappropriate jokes or comments, relating to gender, appearance, attraction or sex
- Unwanted sexual attention and conduct, including emails, in-person conversations and/or text messages
- Unwanted sexual proposition or expression
- Unwanted touching
- Promises of special treatment in exchange for sexual acts, or that employment is contingent upon committing sexual acts

WE TREAT OUR EMPLOYEES WITH DIGNITY AND RESPECT

Violence-Free Workplace

Everyone has a right to work in a safe workplace. This includes one that is free of acts and threats of violence. We do not tolerate acts or threats of violence by employees or third parties. We take all reports of violence seriously.

Everyone must help maintain a violence-free workplace. In cases of imminent danger, call the police. If you experience or witness an act or threat of violence, report it to Human Resources, any manager or the police. You may also use MyHR or Cargill's [Ethics Open Line](#).

Review Cargill's [Violence-Free Workplace Policy](#) for guidance.

Q I saw one of my co-workers confront another one. She was enraged and slammed her fist on the desk. She then yelled a violent threat at him. Could a threat count as violence that violates our Code?

A Yes, the threat and the intimidating fist slamming would all fall under the prohibition of violence under our Code.



WE TREAT OUR EMPLOYEES WITH DIGNITY AND RESPECT



Alcohol and Drugs

Cargill provides a safe and secure workplace. The misuse of drugs, alcohol and other controlled substances on the job or at job-related events is prohibited.

We expect employees to be free from the influence of intoxicating substances while working on our behalf. Manufacturing, soliciting, distributing, possessing or using unauthorized drugs, alcohol and other controlled substances at Cargill locations is also prohibited. Alcoholic beverages may be served at company-approved social functions in accordance with our drug and alcohol policy. If you are taking prescription medication that could impair your ability to work or pose a threat to safety, consult with Human Resources, your manager, local Environment, Health & Safety personnel and/or the Company medical service (where it exists). Your prescription/medical information will be kept confidential, in accordance with Cargill policy.

Review Cargill's Alcohol and Drug Policy for your location for guidance.

Q A worker I supervise has been slipping in productivity. After I questioned her, she broke down in tears, saying she feared she had a drinking problem. What should I do?

A *We care about the well-being of all our employees. We cannot, of course, tolerate drinking alcohol on the job. But we do offer help for those who are ready to receive it. Consult with the Human Resources Department for resources to share with the employee.*

OUR COMPANY AND COMMUNITIES

We Protect Cargill's Information, Assets and Interests

We count on one another to act as stewards of the organization. To preserve the value of Cargill, we protect the information and assets entrusted to us and avoid situations that may let personal interests influence our business judgment.

Cargill Property and Resources

We protect Cargill's property and resources. These include both our physical assets, such as our facilities, materials and equipment, as well as our communication systems, such as our computers, Internet service, telephones and email.

Employee Data Privacy

We may collect, hold or process personal information for employment purposes. We handle this information lawfully and properly, and protect it from disclosure. Review Cargill's [Data Privacy for Employment Information Policy](#) for guidance.



WE PROTECT CARGILL'S INFORMATION, ASSETS AND INTERESTS



Cargill Intellectual Assets

Among Cargill's most valuable assets is our intellectual property. This includes copyrights, patents, trademarks and trade secrets. Unless you know information may be disclosed, assume it is confidential.

Never disclose confidential information to anyone outside the company unless you have explicit approval and it's covered by a non-disclosure agreement, if appropriate. Even inside Cargill, do not share such information unless the person has a business need to know it.

If you create or invent things on the job, make sure you understand how to protect the intellectual property that results from your work. For instance, you may need to keep records, report on research and development or assist with obtaining patents on behalf of Cargill.

Review Cargill's [Copyright Policy](#), [Trademark Policy](#) and [Confidential Information Policy](#) for guidance.

Q I have found that someone has left a file in our break room containing a detailed customer list. It was not marked confidential. What should I do?

A *Even though it is not marked as such, treat it as confidential and report what you found to your manager. A customer list is a typical kind of trade secret that would be useful to competitors if discovered. That's valuable information and a disclosure could deplete its worth.*

WE PROTECT CARGILL'S INFORMATION, ASSETS AND INTERESTS

Insider Trading

Cargill strictly prohibits:

- Trading on "material nonpublic information" about third-party or partner companies with publicly traded securities (including debt securities)
- Communicating "material nonpublic information" to others in violation of the law
- This conduct, commonly referred to as "insider trading," is illegal in most places. It can result in severe penalties for both you and Cargill, even if you do not profit from the violation.

Information is "material" if it is likely a reasonable investor would consider it important in making an investment decision.

Q I occasionally discuss work with my brother. Could I risk violating insider trading laws by telling him something that has not been made public?

A *Yes. Our Code prohibits sharing material, nonpublic information with anyone, such as your brother, since that person could then subsequently trade on that information, which is against the law. Consequences for insider trading can include significant criminal and financial penalties. So, you should not share such information.*

Derivatives Transactions

Cargill enters into derivative transactions, including futures, swaps and options, throughout the world. We enter these transactions on organized exchanges and bilaterally with counterparties.

Personal trading in commodity derivatives in which Cargill trades or holds positions (known as "In-Scope Products") raises conflicts of interest concerns. So, before trading in In-Scope products, you must disclose your intent to make these trades and obtain approval from your manager, group or function leader and from Derivatives and Commodities Compliance (DCC).

In addition, do not trade any other product that could create a conflict of interest with your Cargill responsibilities, without first disclosing the trade and receiving prior approval.

Consult with our [Policy on Employee Trading](#) for further guidance. Cargill's Derivatives and Commodities Compliance (DCC) team also provides information and resources on derivatives and commodities trading on My Connects under Functions → Law → Ethics & Compliance → Derivatives & Commodities Compliance. Email questions or requests to derivatives-compliance@cargill.com.

WE PROTECT CARGILL'S INFORMATION, ASSETS AND INTERESTS

Conflicts of Interest

We avoid situations where our personal interests could inappropriately influence our business judgment or even simply appear to do so. These situations are called “conflicts of interest,” because there is a conflict between personal and job-related interests.

Examples of situations in which a conflict could exist include:

- Outside employment, such as working for a competitor or competing with Cargill with a side business
- Personal relationships, such as hiring a family member as an employee or a vendor
- Business opportunities discovered on the job and used for your own gain instead of Cargill's
- Gifts or entertainment that affect—or could appear to affect—your business judgement
- Reporting arrangements (either direct or indirect) with another employee with whom you have a personal (familial, romantic or intimate) relationship

It's not always clear whether an activity creates a conflict of interest. Consult with your manager or the Ethics and Compliance Office if a conflict appears possible. We must disclose all potential conflicts of interest, even when we are unsure about whether they are conflicts, so that we can confirm if they are actual conflicts and how to best manage them.

Review Cargill's [Conflicts of Interest Policy](#) for guidance.



Q I am on a panel to choose a new supplier. My sister-in-law has invested in one of the suppliers and would stand to benefit if we selected that supplier. What should I do?

A *Disclose your sister-in-law's investment as soon as possible to your manager or other appropriate personnel. You may need to recuse yourself from the panel over this decision. When in doubt about whether a conflict of interest exists, always disclose as soon as possible.*

We Are a Responsible Global Citizen

The breadth of our operations means that Cargill touches almost every aspect of society. With our global reach comes the responsibility to understand and manage our impact. We maintain strict environmental and food safety standards within our operations and share our global knowledge and experience to help meet economic and social challenges.

Managing Our Environmental Footprint

We manage our environmental impact and help conserve natural resources. We comply with environmental laws and our own strict requirements to improve our performance. This includes:

- Diligent review of environmental impacts
- Waste minimization
- Efficient resource use

We evaluate the environmental impact of and obtain all necessary permits and approvals before making substantial changes to our business, such as a new plant or a major capital project.

All Cargill employees must follow applicable environmental laws and company requirements. This includes prompt responses to, and mitigation of, any impacts of environmental incidents or violations. Our managers must make sure employees have the training and resources to help meet these responsibilities.

Review Cargill's [Environment, Health and Safety Policy](#) and the Cargill EHS Policy Manual for guidance.



WE ARE A RESPONSIBLE GLOBAL CITIZEN



Food and Feed Safety

We have a commitment to produce safe food and feed every time, everywhere. Cargill has a strong food safety culture throughout our system. This includes an external supplier verification program, a robust food safety plan in each facility, and sanitary transportation requirements.

All Cargill employees are responsible for food and feed safety. Our facility managers make sure employees have the necessary training and resources to carry out this responsibility. We share information on food and feed safety both internally and externally, and encourage our employees to bring forward good ideas. Review Cargill's [Product Safety, Quality and Regulatory Policy](#) and the Cargill Food Safety Policy Manual for guidance.

Q My business operates in a developing country and competes with companies that don't have Cargill's strict food safety requirements, putting Cargill at a competitive disadvantage. Can we just comply with the laws of the developing country?

A *No. Because we touch the global food supply chain in so many ways and places, we purposely take a stronger, comprehensive approach to ensure the safety of our food and feed products.*

WE ARE A RESPONSIBLE GLOBAL CITIZEN

Enriched Communities

We apply our expertise to help meet the economic, environmental and social challenges of our communities. We work with a wide range of public and private partners. Together, our people and businesses contribute time, talent and financial resources to address the difficult issues that no one organization alone can solve. This is part of being a responsible global citizen. We hold ourselves to high standards and encourage others to do the same.

Contact your local Corporate Responsibility Team for guidance on how your business or function can support worthy projects in our communities. Review Cargill's [Charitable Contributions Policy](#) for guidance.

Political Activity

Cargill respects the right of its employees to participate in the political process and in any political activities they choose. But employees must keep personal political activities and views separate from their work for Cargill. Do not use Cargill's resources, like our facilities, email or trademarks, for your own political activities. We must avoid giving any impression that Cargill supports any political view that you happen to hold.

Corporate political activity, including contributions and lobbying, is highly regulated. The Government Relations team manages Cargill's political activities. Businesses and functions should contact Government Relations for review and approval before making any political contribution on Cargill's behalf. These contributions may be in support of a candidate, party, campaign, public official or ballot issue, or to further a lobbying activity. This helps ensure that political activities on behalf of Cargill comply with the law and support the organization's interests.



Resources to Report a Concern

Remember, if you witness or suspect misconduct, you have a duty to report it.
This will take courage, but it is the right thing to do.

Talk to your manager or reach out to any of the following:

Your Human Resources Manager

Your Business or Function Leader

The Ethics and Compliance Office at ethics@Cargill.com

You may also submit a confidential report via **Cargill's Ethics Open Line**, available 24 hours a day, 7 days a week for employees anywhere in the world, and depending on the country in which you reside, you can choose to report anonymously.



Cargill's Code of Conduct
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