

Cargill Modern Slavery and Human Trafficking Statement

Cargill Australia Limited and Cargill Japan Limited – Joint Statement for the period 1 June 2019 to 31 May 2020

This statement covers the activities of Cargill Australia Limited ACN 004 684 173 (Cargill Australia) and Cargill Japan Limited ARBN 097781452 (Cargill Japan) and their controlled entities to understand and implement actions to minimise the risk of modern slavery and human trafficking in our operations and supply chain. It also includes information more generally related to the activities of Cargill worldwide.

We empower and connect people and partners across our global supply chains and within the communities we serve.

- Respect human rights and treat people with dignity and respect in the workplace and in our communities
- Convene stakeholders – from customers and farmers to governments and NGOs – to collaborate and co-create solutions to shared global challenges
- Connect to a global community of more than a million producers – to increase productivity, market access, and expand responsible practices to nourish a growing population
- Support communities and engage partners throughout the world in areas we operate through philanthropic giving, volunteerism and local outreach

Our priorities:

- Human Rights & Inclusion
- Food & Nutrition Security
- Farmer Prosperity
- Enriching Communities

Introduction

- This is the first Modern Slavery Statement (Statement) for Cargill Australia and Cargill Japan as set out in the Modern Slavery Act 2018 (Cth). This Statement is a joint statement by Cargill Australia and Cargill Japan. It only relates to the entities owned and controlled by Cargill Australia and Cargill Japan. The purpose of this Statement is to outline our approach to ensuring we have robust frameworks and processes in place to minimise the risk of modern slavery in our operations and supply chain. It also includes information about the activities of Cargill globally to minimise the risk of modern slavery and human trafficking in our operations and supply chains.
- Cargill's purpose is to nourish the world in a safe, [responsible and sustainable](#) way. We aspire to be the most trusted source of products and services across the agricultural, food, industrial and financial markets we serve. We have 155,000 employees in 70 countries who strive to feed the world in a responsible way and improve the communities where we live and work. Cargill is committed to treating people with dignity and respect in the workplace and in the communities where we do business.
- We promote and respect human rights as outlined in the Universal Declaration of Human Rights and the UN Sustainable Development Goals. We are a signatory of the UN Global Compact. We take guidance from the UN Guiding Principles on Business and Human Rights and the International Labour Organisation (ILO) Fundamental Principles and Rights at Work. These frameworks call on us to engage in due diligence and take action to remedy issues where identified in our workplaces, supply chains and extended communities.

Code of Conduct and Commitment to Human Rights

Together we can help the world *thrive*.

At Cargill, all employees and affiliated companies worldwide are required to comply with Cargill's Code of Conduct. The Code of Conduct outlines our company's ethical and compliance standards for conducting business throughout the world. It highlights our policy statements on a variety of topics and is grounded in our seven Guiding Principles, which are ingrained in our culture and serve as the foundation for the behaviours expected from all of our employees in all parts of the world.

Our complete Code of Conduct is publicly available on our Web site:

<https://www.cargill.com/about/ethics-and-compliance>

Cargill's Commitment on Human Rights

Cargill's people are our greatest asset.

We provide an equitable, safe and supportive workplace. Every employee receives an introduction to the Code of Conduct and Guiding Principles, which is followed by regular training to help ensure that employees' actions align with the company's commitments on business conduct and human rights.

Our [Commitment on Human Rights](#) further frames and articulates Cargill's approach and standards across our diverse business lines. Cargill does not use or tolerate the use of human trafficking, forced labour or child labour. In particular:

- the recruitment, harbouring, transportation, provision, or obtaining of a person for work or services through force, fraud or coercion for the purpose of involuntary servitude or slavery;
- any work or service not of free will, exacted under threat of penalty, including practices such as restricting movement or imprisonment, withholding wages or identity documents to force a worker to stay on the job, or entangling workers in fraudulent debt;
- any work or service by children exposing them to risks that can harm physical, mental or educational development.

Migrant or temporary foreign workers are accorded treatment and protection equal to other workers. We support the UN Sustainable Development Goals' ambitions to promote decent work for all around the world.

Cargill's Commitment on Human Rights, which outlines our commitments to operating sustainable supply chains, respecting and supporting communities, and promoting an equitable, safe, and supportive workplace, can be found here:

<https://www.cargill.com/news/labor-employment-and-human-rights>

Cargill's Modern Slavery and Human Trafficking Statement (found at Cargill's UK site)

<https://www.cargill.co.uk/en/slavery-human-trafficking>

Cargill's California Transparency in Supply Chains Act Disclosure

<https://www.cargill.com/news/supply-chains-act-disclosure>

Operating Responsible Supply Chains

Supply chains supporting the global food system must be sustainable—balancing the needs of today with the needs of future generations. We can achieve Cargill’s purpose only by working closely with our Suppliers. Our [Supplier Code of Conduct](#) explains how we expect farmers, producers, manufacturers, and others to work with us to fulfill that purpose—ethically and in compliance with applicable laws.

Our Supplier Code of Conduct extends our seven Guiding Principles into the supply chain, and is translated into nearly thirty languages.

We believe this joint commitment to ethical conduct and integrity is a strong foundation for trusted business relationships that create shared value.

Our Supplier Code of Conduct requires Suppliers to know and follow the laws that apply to them and their business. It requires Suppliers to treat legal requirements as a minimum standard, including meeting or exceeding all legal requirements for compensation and working conditions. Cargill also expects our Suppliers to stand with us in prioritising the safety, well-being, and dignity of all individuals whose talents and hard work help us deliver our products and services. Our Supplier Code requires Suppliers to provide safe and healthy working conditions at all of their operations, foster an inclusive work environment that is free of harassment and discrimination, and respect employees’ rights to organise and bargain collectively. Cargill demands that Suppliers never use or tolerate the use of human trafficking, forced labour, or child labour as defined by the ILO.

More information about our sustainability commitments across our supply chains can be found at: <https://www.cargill.com/sustainability>

CARGILL AUSTRALIA

Structure, Operations and Supply Chain

Established in 1967, [Cargill Australia](#) is an unlisted public company and the key flagship operating entity for Cargill in Australia. Cargill Australia is a wholly owned subsidiary of Cargill, Inc., a US based corporation and one of the world's largest, privately-owned businesses, providing food, agricultural, risk management, financial, and industrial products and services around the globe.

Cargill Australia services the country’s large grain export commodities and has over time extended into grain and oilseed origination, oilseed processing and refining, processing and packing value add; seed distribution, grain and cotton trading, grain storage and handling as well as joint ventures including in beef processing.

Cargill Australia currently employees approx. 291 permanent and part time employees. Its operations take place in Australia with its head office located in Melbourne.

Cargill Australia's main operating entities comprise: AWB GrainFlow Pty Ltd; Cargill Processing Limited; Cargill Australia Financial Services Pty Ltd. Cargill Australia acts as local agent for Cargill Japan a registered foreign company operating in Australia.

Cargill Australia also has an interest in the following joint ventures:

- Teys Australia Pty Ltd – a beef processing and cattle feeding businesses. Head office located in Queensland.
- BFB Pty Ltd – storage and handling joint venture in Temora, NSW.
- Rightship Pty Ltd – Rightship helps customers manage marine risk by identifying and eliminating substandard ships from their supply chain. Head office located in Melbourne.

The joint ventures are either not reporting entities or will make their own reports.

CARGILL JAPAN

Structure, Operations and Supply Chain

[Cargill Japan](#) is a Japanese company (with no equivalent Australian liability to an Australian unlisted public company). Headquartered in Tokyo, Japan. Cargill Japan is wholly-owned by Cargill, Inc. and is mainly engaged in the wholesale of agricultural products and foods as well as the provision of agency, transportation, risk management and other services. Cargill Japan's subsidiary entities are engaged in providing purchasing agency services to Cargill Japan and purchases/sales of various foods/agricultural products.

Cargill Japan currently employees approx. 300 people.

Cargill Japan's operations mainly take place in Japan – locations in Tokyo and Kobe, Kansai. In addition, Cargill Japan has overseas branches and representative offices in Vancouver (Canada), Winnipeg (Canada), Bangkok (Thailand) and Melbourne (Australia).

Our integrated supply chain



For farmers
We supply feeds, other inputs and expertise to farmers, and buy crops and livestock from them

We provide insights to our partners



Data analytics



Market expertise



Risk management



Financial solutions

We transform raw materials into finished goods



Animal nutrition



Food ingredients



Animal protein



Branded foods



Bioindustrials



For customers
We deliver finished goods to customers in the foodservice, retail, consumer packaged goods and industrial sectors

We move products around the world



Roads



Rail



Rivers



Oceans

Structure, Operations, Supply Chain

Cargill Australia: Corporate Functions

Main Operations

- Head office Operations located in Melbourne, Australia
- Direct Employment of workers
- Manages/operates joint ventures
- Acts as local agent for Cargill Japan

Supply Chain

- Office consumables
- Leased Office space
- Kitchen equipment/supplies
- Office equipment
- Technology (hardware, software and cloud services)
- Employment services – casual labour provided by professional services/recruitment providers
- Service providers who provide services to Cargill Australia, e.g. accounting, legal, cleaning, back office support
- Local office business services (i.e mail); catering; visitor/caller management

Cargill Australia: Origination

Main Operations

- Acquiring grain and oilseeds; provision of risk management products

Supply Chain

- Grain and oilseed products purchased from growers, traders
- Employment services – agents and distributors who provide professional services
- Service providers who deliver services to our origination business to facilitate for example, payments to growers, payment paperwork

Cargill Australia: Trading and Supply Chain

Main Operations

- Transporting/moving goods/ rail and truck
- Commodity Trading; sales and marketing
- Distribution of meals and oils
- Supply of specialty seed for oilseed production

Supply Chain

- Grain and oilseed products purchased from growers, traders
- Forward purchase contracts, cash at silo, hectare-based contracts
- Service providers, contractors and sub-contractors who deliver services to our supply chain business: road and rail transport providers; storage services; stevedoring and port terminal services; container packing; shipping agents

AWB GrainFlow: Storage and Handling

Main Operations

- Receiving, storing and out turning grains and oilseed

Supply Chain

- Site consumables e.g. tarps, ground sheets, fuel, PPE, electricity, fumigant
- Service providers, contractors and subcontracts who deliver services to our sites such as consulting services, OH&S services, waste removal, electrical/mechanical/civil maintenance, freight, fumigation, equipment certification, lease and hire equipment, security, drug and alcohol testing, IT,
- Employment services – casual labour provided by professional services/recruitment providers

Cargill Australia and Cargill Processing, Crushing and Refining

Main Operations

- Process oil seeds to produce crude oil and oilseed crush by products
- Process crude oil to produce refined oil
- Cargill Processing – employs workers

Supply Chain

- Plant consumables
- Safety equipment (gloves, glasses, hard hats, etc)
- Maintenance consumables
- Production consumables (brooms, shovels, etc)
- Laboratory consumables (chemicals, lab equipment)
- Power and Gas
- Chemicals/processing aids (hexane, bleaching clay etc)
- Plant and Equipment (motors, gear boxes, couplings, belts, conveyor chain, pumps, plant replacement, etc)
- Packaging Material (20L drums, cardboard, etc)
- Employment services – casual labour provided by professional services/recruitment providers

- Service providers who deliver services to our crushing and refining business such as consulting services, environmental services, maintenance contractors, electricians, cleaning, gardening
- Waste disposal (solid waste, liquid waste)

Cargill Japan: Corporate Functions

Main Operations

- Head office operations located in Japan
- Direct employment of workers
- Manages minor investments

Supply Chain

- Office consumables
- Leased Office space
- Kitchen equipment/supplies
- Office equipment
- Technology (hardware, software and cloud services)
- Service providers who provide services to Cargill Japan, e.g. accounting, legal, cleaning, back office support
- Local office business services (i.e mail); catering and entertainment; visitor/caller management

Cargill Japan: Food Purchase and Supply

Main Operations

- Purchases food products/materials

Supply Chain

- Cargill Japan purchases various foods/agricultural products/proteins from outside of Japan through Cargill group companies or external suppliers and on sells these products to Japanese customers
- Cargill Japan procures risk management services and ocean transportation services from other Cargill entities

Potential Risks in Our Supply Chains

Cargill's approach:

- Is consistent with the UN Guiding Principles on Business and Human Rights and means that we focus our actions to address modern slavery risks on the highest risk areas. Through a mandatory Compliance Risk Assessment process managed by our Chief Compliance Officer and Global Ethics & Compliance Office, Cargill systematically assesses the risks of forced and child labour across its global supply chains.
- Involves conducting a qualitative task risk assessment and prioritization methodology dependent on the knowledge, experience and professional judgment of those involved. We employ subject matter experts to guide this work.

Specific to the entities discussed herein – following the guidance provided by the Australian Border Force “Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities” – we identified the different parts of our supply chain for each operation and considered risks that may cause or contribute to modern slavery practices. We also took into consideration other risk factors such as the sector, industry, types of products and services, geographic locations and business models.

In undertaking this process we were able to identify areas of no or low risk, such as any operational or corporate head office activities undertaken directly by Cargill employees in accordance with internal policy and processes.

Cargill takes a targeted risk-based approach to assessing and addressing modern slavery risks in its supply chains.

Potential Risks

Cargill Australia:

We identified potential “risk areas” of forced labour in relation to:

- origination of grain and oilseed – labour on grain growing farms;
- supply of road and rail transport, stevedoring, port terminals services, container packing, shipping agents and grain and meal storage;
- crushing and refining - supply of safety, maintenance and production supplies, lab supplies /consumables, chemicals, plant and equipment and capital, waste disposal and/or transportation of these materials;
- storage and handling - supply of materials, supplies, equipment, workforce labour, maintenance and engineering works and transportation of goods.

Cargill Japan:

- The risk that suppliers of food products and materials are engaged in modern slavery practices.

Addressing the Risks

The qualitative task risk assessment and prioritization methodology undertaken involved identifying risks and defining identified risks as “high”, “medium” and “low”. For each identified risk we then identified the defence layers/control measures that are in place and any proposed changes or ways to eliminate, substitute or reduce identified risks.

For tasks identified as “High Risk” additional defence layers must be implemented with high priority to reduce risk. For tasks identified as “Medium Risk” additional defence layers must be developed and implemented. Tasks identified as “Reduced Risk” may continue to be performed with existing safety processes and managed for continuous improvement.

Cargill Japan engages in a thorough due diligence process prior to doing business with external suppliers. This involves Cargill representatives undertaking site visits/inspections of potential supplier premises, having suppliers complete and attest to certain matters in

an Initial Self-Assessment Questionnaire; the undertaking of risk assessments, audits and follow ups if required.

In relation to modern slavery risks Cargill Australia Limited (trading as AWB), AWB Grainflow Pty Ltd, and Cargill Processing Limited address risks in a variety of ways:

- Having suppliers agree to follow Cargill's Supplier Code of Conduct <https://www.cargill.com/about/supplier-code-of-conduct>.
- Our origination field teams are provided regulatory and ethics training on a regular basis and conduct regular farm visits.
- In relation to our supply chain operations road freight is heavily regulated by NHVR and rail is heavily regulated by ONSR. The majority of Cargill road carriers are NHVAS accredited and externally audited. Cargill conducts random audits. Stevedore and Port Terminal Services pay and working conditions are Union regulated. All managed spend, container packing and bulk storage is contracted and suppliers contractually agree to follow Cargill's Supplier Code of Conduct.
- All major suppliers to our oilseed crushing and refining operations (safety, maintenance and production suppliers, chemical / processing aids, plant and equipment, packaging materials, employment services, waste disposal, maintenance contractors, electricians, cleaning, gardening, laboratory consumables and consulting services) contractually agree to follow Cargill's Supplier Code of Conduct. The majority of our maintenance and construction contractors are trade certified and covered by Government Awards.
- A number of the larger contracts in our Grainflow storage and handling business are managed services in relation to which suppliers contractually agree to follow the Cargill Supplier Code of Conduct. GrainFlow has controls and systems in place to manage workforce fatigue and health and safety. Invoices from suppliers are itemized and reviewed to ensure correct pay allocations. For large spend areas Cargill also tenders for supply on a regular basis with site visits of certain suppliers where required.

Our Approach

We believe it is essential that all parties in the supply chain – industry, government and non-governmental organisations (NGOs) – work together to address the complex problem of modern slavery and support rural communities and ensure children and adults are not subject to unfair labour conditions. Globally, we are taking actions in our supply chains to prevent and address illegal, abusive or forced work, which include:

- Cocoa
- Soy
- Palm
- Cotton
- Poultry
- Aquaculture Feed

Cocoa – as part of our [Cargill Cocoa Promise](#) we are committed to protecting the rights of children, to raise awareness of labour issues and improve working practices through training and education of farmers, their communities and families. We are partnering with government, civil society and other industry members to protect the rights of children in the cocoa sector. We are actively working towards identifying and intervening in instances of child labour in the cocoa supply chain. By 2025 we will have introduced a monitoring and remediation system in the five countries where we directly source cocoa— Brazil, Cameroon, Côte d’Ivoire, Ghana and Indonesia. In our indirect supply chain, we will carry out due diligence assessments to identify where the risks are located and engage supplier partners to increase their own transparency and build their capacity to address common challenges. Our [Community Wellbeing Strategic Action Plan](#) outlines the concrete steps we are taking to deliver on this commitment with great urgency.

Soy – our commitment to sustainable soy production, laid out in [Cargill’s Policy on Sustainable Soy – South America Origins](#), includes being a signatory to the Brazilian National Pact for the Eradication of Slave Labour, which monitors Suppliers. We will not do business with those who appear on this list. Further, [Cargill’s South American Soy Action Plan](#) commits to a transparent and sustainable South American soy supply chain that respects and upholds the rights of workers, indigenous peoples and communities. Cargill prohibits the use of human trafficking, illegal, abusive, forced or child labour within our soy operations anywhere in the world, and works with our Suppliers to prevent and address such practices across the supply chain. In cases where exploitative practices are identified, we will determine remedial actions to ensure appropriate and transparent responses. We commit to working with our employees, contractors, Suppliers, independent organisations and governments to uphold an ethical and transparent recruitment process. We prohibit any form of unlawful retention of identity documents.

Palm – Cargill has deployed a global [Policy on Sustainable Palm Oil](#). As Cargill largely operates between growers and consumers, we commit to using this position to take practical measures guided by strict criteria for fair labour rights and human rights. In particular, we commit to a palm supply chain that:

- Recognises and upholds the rights of workers, indigenous peoples and local communities in line with international human rights principles and local applicable laws, and;
- Upholds high standards of transparency through reporting of traceability, timebound implementation plans, resolving grievances and achieving third party verified policy compliance. Our [palm grievance dashboard](#) is publicly available.

Cargill prohibits the use of human trafficking, illegal, abusive, forced or child labour within our palm operations anywhere in the world, and we work with our Suppliers to prevent and address such practices across the supply chain. In cases where exploitative practices are identified, we determine remedial actions to ensure appropriate, timely and transparent responses. Cargill commits to working with our employees, contractors, Suppliers, independent organisations and governments to uphold an ethical and transparent recruitment process whether carried out directly or indirectly for our palm

business through sub-contractors. We prohibit any form of unlawful retention of identity documents and are taking steps to embed forced labour issues as part of due diligence. As we recognise a number of issues require stakeholder collaboration, we have launched a [study](#) of migrant labour in the palm oil sector in Malaysia with industry peers to assess the risk and seek informed, credible and specific recommendations on how to address them. In addition, we recognise that worker representation is critical to effective monitoring and transparency, and are piloting the use of worker voice systems in our supply chain to improve workers' ability to provide feedback and help Suppliers appropriately manage worker concerns.

Cotton – We are committed to improve sustainability across the [cotton](#) supply chain. We support the work being done by governments and organisations like the Association of Cotton Merchants in Europe and the ILO to find practical solutions to labour issues while fostering responsible economic development. At origin, we support the efforts of assurance organisations Cotton Made in Africa and the Better Cotton Initiative, which work to educate farmers, assess working standards, and ensure against use of forced or child labour per ILO standards.

Poultry – In addition to ensuring we operate in compliance with all legal requirements surrounding employee rights, health and safety, ethical responsibilities and human trafficking, [Cargill's poultry business](#) utilises Sedex auditing. Our facilities' annual SMETAs (Sedex Members Ethical Trade Audits) verify that we operate to a high ethical standard. We also partner with ethical trade nonprofit consultancies to focus improvements on labour conditions in our supply chain.

Aquaculture Feed – Beyond utilising Cargill's Supplier Code of Conduct, our aquaculture feed business in Scotland deploys assessments of all of its Suppliers of feed ingredients on the risk of modern slavery and human trafficking. Assessments centre on the country of origin and supply sector. Suppliers identified as working in high risk countries or sectors are contacted individually and asked to provide more details about how they work to mitigate risk.

Throughout the company, Cargill is an active member of Sedex, which promotes improvements in ethical and responsible business practices. We make information about our businesses and facilities available to customers through this widely used and recognised system.

Human rights & inclusion

Together we can advocate for dignity, respect and diversity.

- Cargill is unconditionally committed to protecting human rights, treating people with dignity and respect in the workplace and in the communities where we do business, and operating responsibly across the agricultural, food, industrial and financial markets we serve.
- It is essential that all parties in the supply chain—industry, government and non-governmental organizations—work together to improve rural livelihoods, raise incomes, and ensure fair working conditions for all.

This Joint Statement has been approved by:

The Board of Cargill Australia Limited on 21 December 2020

Signed by: Erik Wibholm, Managing Director, Cargill Australia

A handwritten signature in black ink, appearing to read 'Erik Wibholm', with a long horizontal flourish extending to the right.

The Board of Cargill Japan Limited on 10 December 2020

Signed by: Hiroto Sasaki, President, Cargill Japan

A handwritten signature in black ink, appearing to read 'Hiroto Sasaki', written in a cursive style.