

of Conduct







Ca g!!!'s Code of Conduct







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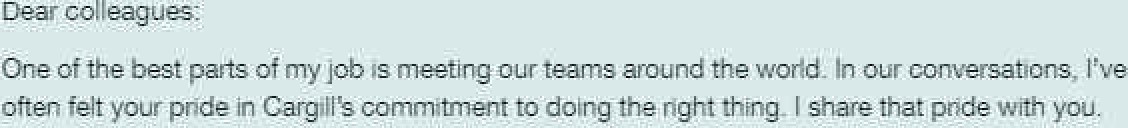


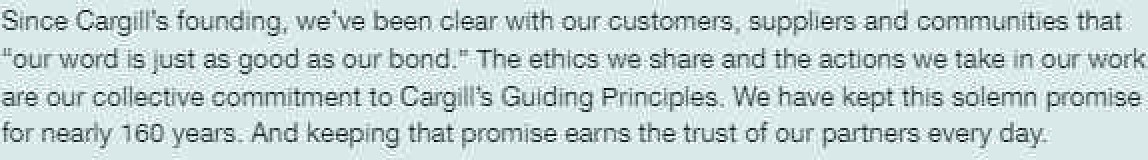
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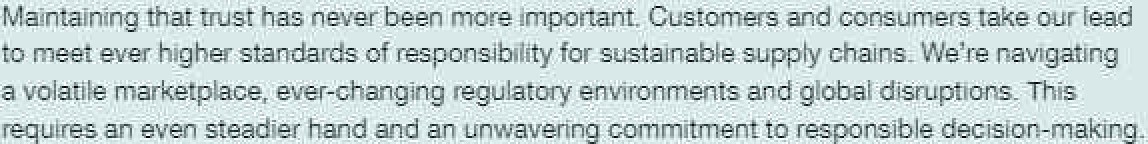


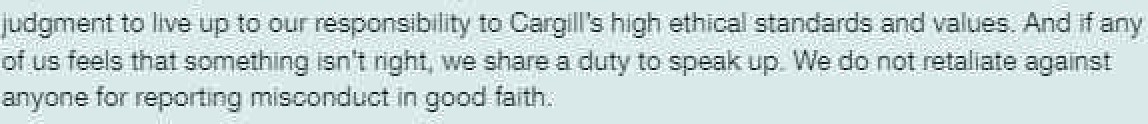
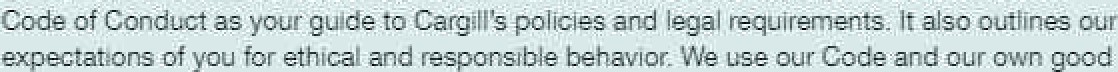
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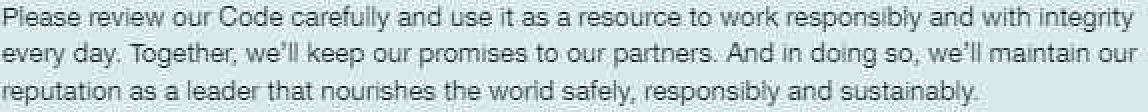
### A. Message fr,a”r:u. the .CEO.













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RERDRT A OOIgCE RR

OUR CODE

### About Cargill’s Code of Conduct

###### Why do we have a Code? What does the Code require

**Cargill's** Code of Conduct outlines our ethical standards for buslness from managers?

conduct wherever we aperate' It's your guide to answer questions and

resolve ethical dilemmas.

Our Code has 7 Guidmg Principles. They express Carglll's core values and ethics. Use them to guide your actions and decision-making on our behalf. The Code also summai1zes key compliance policies. It

h! hlights the key legal and ethical issues and provides guidelines for appropnate conduct.

###### Who must follow our Code?

Our Code applies to all employees of CafgllJ, its affiliated compznl and to members of our Board of Directors when acting on behalf of Cargill. Our Code cannot be wanted unless the General Counsel or Baard of Directors appioves such a waiver.

Manage+s set theline for their teams. They are often the first people empk›y¢es will Mm to with questions. As a result, we expect managers to.

* Set a strong example of ethical conduct
* Provide support to employees in camplying with the Code of Conduct and compliance policies

Enoourage employees to speak up when tttey have questions or concerns.

* Appropriately addfess misco-nduct

I mwiage a team, but sometimes lack the time and resources to promote o-ur Code. What can I do?

What does the Code require of we? A

As employees of Cargill, we must follow our Code by making decJsions consistent with ñ. We must speak up if we have any concerns md report any Code violations that we discover or expanence. Disciplinary action will also apply for the failure to report Code violaf1ons or refusing to participate with an iwestigation

*Y6u can model It e Code in your Dehaviar anD actions. This promotes Ifie CoOe without requiring extra lime or resources.* Have ao *“open door tfiat invites your team to Discuss concerns.*

Car/ 9/ arid mod I Or/r Z9/O *IoIeraTICe* /’oF re/a/iat/Ori *aTiO tell*

*your* learn adout //ie resaurces avaiiaIt/e fa help //iem to/low sur

Code. // u' *have* guestions or cfoob/s, please reach *oo/* fa jrour





### Cargill’s Guiding Principles

We obey the law.

 We conduct our business with integrity.  We keep accurate and nonest records.  We honor our business obligations.

We traat people witn dignity and respect.

Code

bfCondwm

We protect Cargill's informatiDn, assets and interests.

We are committed to being a responsible global citizen.

### Our Ethical Culture



Since our founding in 1865, Carglll has acted on thB 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 anct our communities to thrive.

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

y REPORT A CONCERN

Good clecisions tnrocigls discussion

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



Is my di3cision consistent with our Guiding Principles?



Would T be okay with everyone knowing about my decision?



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

IN you are not sure the answer is "YES" or think the answer m:ght be "NO," then vou shculd seek guidance from your martag=r

or onc of the other resources i›sted in our Gode.

### Our Duty to Speak Up

##### What sl or dcl I do if I discover or srisgect misconduct?

Even the most ethical companies can have conduct issues. it’s how we deal with those issues that will flag otir commitment to our Guld‹ng *P rnclples* and set us apart from other companies.

Reporting m.sconduct takes courage, but it's the ngfit thing to do. CargilT will not to'erate retaliation against anyone who, in good faith, raises a concern, reports misconduct or participates iri an investigation.

Where slzoulcl T start?

Talk to your manager. If you're not comfortable doing so, or rf your manager doesn”t respond appropriatetv. reach a-uñ to any of fhe following-

* + Your Human Resorirses Manager
  + Your Business or Function Leader

The Ethics and Compliance O1fice at =tñ'cs4Cara•!|.com

You may also submit a confidential report via Carglll's Ethics Open Line. It's available 24 hours a day, 7 days a week fo1 employees an vñere in the world. and depending on the co+intry io which you *res›de,* you can choose to report ar‘.onymousIy.

y **REPORT A CONCERN**

How will Cargill respond?

Cargill will nvestigat= arry reports Ja›rly and appropnately. We will take all necessary steps to address any vio'ations 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 cooperate or participates in any invest:'gation. If vou experience or discover retaliation. either •n person or online. please report it to your manager or any of the above Speak Up resources. Review Cargil!'s Aoti-Retaliation Po!icy for guidance.

One of my empioyees 1s raising concerns about a new law thai appJies to our operations. He suspects that not everyone on the team is following the law appropriately. I guestion Els conclusions. however. What should I do?

*E\-en if you* hav\* *clou0ts, take Ifie feport se.fiousIy. Tfian ’ i:fie employee for* shiny *up* and listen *o Hentive!y to* his concerns. *Ask ctorityi'ri9 qunsâons. Take good notes and* forwafii DfS mDcems *to be E*tn*ics and Compl!'arice Oboe,* aioaq *w.''th your own am•eszr e ’. keep in mind .\*ha\** row *snoul0 not conduct Your own i'n r* es*tiqation i,n In the maRer;* contact the Ethrcs *and Compliance* Ohm *ter ass .''s* is *oce.*

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RERDRT A OOIgCERN

OUR ETHICAL/LEGAL RESPONSIBILITIES

## We Obey the Law

Obeying the law is the founclation on which our reputation and Guicling 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 courrtnes. 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 LI.'3. 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 will all of the laws that apply to our businesses. At times. the law that applies to our business activitles may be unclear. If you have any questions or concerns about the law, please contact the Law Departmen'L

i saw on the news that rrry loca£rty passed a new law on food sa1'ety. 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, *ao* I need to follow It?

/f /t *applies to your won you will neeD to follow ”it— even if it is not in Ifie C:ode. Raise your concerns aDout file law witti your* manager or *Ifie Law Department.*

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y REPORT A **CONCERN**

WE OBEY THE LAW

Tlsircl Panes nncl Legnl Condr ct

Ass sting a third party in illegal activlties can. damage our r=puiation and result in señous legai action against both you and Cargill. This can include fines and claims for damage from us. In addition to obeying the laws tf+at apply directly to us, we must not taJce actions which we krow, or ought to know. will help a third party break the law. Do riot ignore signs that a third *p* is using Cargiil to help them do something illegal. If you have any concerns that a th!rd party with whom you are doing business s using Cargiii in that \vav, report it to the Law Department.

 We have Deen 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 w//fi your *manager or tfiie Ethics and*

## We Conduct Our Business with Integrity

y REPORT A CONCERN

We take pride in conducting our business with inti9grity. We compete vigorously but do so fairly and ethically. We do not offer or accept bribes or !napproprTate gifts, and we comply with the laws and regulations that support fair competition and integrity in the marketplace.

Anti-Br!Dery

We never offer, accept or *ece”we* bribes, *4cfibac’ a* or other corrup? payments to or from others. Including government officials. We ensure that we understand and stnctly foliow all applicable anti-b+ibery and ant—corrupt o-n laws. including wLien we Interact with aovemment officials. We oa+efuIIy select and in1eract wñh th‹rd parties (such as saI=s agents, representatives, consultants and distributors) who act on our behalf. and vie speak up about any bribery misconduct. We also adhere to our Anti-Bribery Due Diligence Piocedttre when h.ring or retainsns high rsk vendors (who interact with a government official on our behalf or who were recommended to us dy a government officla) located in and/or providing services in Latin America, Afnca.

Asia-PacCc. the Middle East or Eastern Europe.

Bnbery is against our Code and many international laws.

Bv complying with our Code's ant1-bn'bery and corruption requirements, we adhere to the law ar'.d protect our iorg-standing ethical reputation. Review Cargil!'s Anti-Bribery Policy and

Anti-Bribery Due Diligence Piocedure for guidance.

WE CONDUCT OUR BUSiN ESS WITH IN TE GRITY

Business Gits and E‹stertninment

Used correctiy, gifts and entertanment can promote goo-dvzill and reinforce sDong bus\ness relationships. In some cultures. gifts may be customary and expected. However, because gifts and entertainment. carry valtie for tLie recipient, consider tLiem carefully. We must avo-'d situations in which they might Influence or appear to influence your decision—making or someone e'se”s. Review Cargill’s Gifts and Entertainment Pol cy for guidance.

Do not oRer or accept any gifts or entertainment that:

Are extravagant, illegal pr unreasonable under local custom of tile giver or receiver

* + Coincide with s:'gnrficant decisions affecting Cargill that could appear to imp+operIy Influence them

Are in the form of cash cr cash equivalents such as *gif cards,*

gitt certificates or vouchers

Would cause embarassment to Garg4l or prompt questions

about Gargtll's integrity

y REPORT A **CONCERN**



After hav1ng had lunch wG a distrlbutor represerrtafive, 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?

*No.* 77ie cosr *of* the *wrist 'atch* won/d i/'ke}’ de cons!'dered 'extravaoant. " *Report it lo* your *manager or the Elfiics and Compliances OtTice. E\-en* tfiouqn *i“he.*' e *are no upco.minp Decifi!ons concerning the disi“riDutor, Lie gitt’s cost alone makes it* /'na prcpfaN. *We wristwatch may give i“he appears.n<-e of undue ink.uence on soul future decision• wi'tn* tile *d.''strihutor.*

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y REPORT A CONCERT

WE CONDUC TOUR BUSINESS WITH IN TEGRiTY

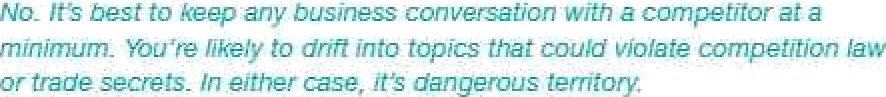
##### Fair Con petition

l’e protect customers and the marketplace by complying with fair competition and antlst laws Thèse laws =ncourage free and oper competrtion in the maiketplace. Th y ensure customers have an opportunity to purchase goo¢i qualifi pro-ducts and servies from a varïety of sources at Iow=r prix.

Fair competrt!on and antitrust laws are complex and vary by courrtry. But th=y generally proh bit competitors from working together to limb competition in commercial or labor mark=ts. They aiso prohibit mproper attempts to monopoI ze markets or control pfices.

We expect all employees to follow our Code and ñomp=tition Pollcy. We must in1eract wñh comp=titors carefully. This is especially Fue during trade association meetings arid events and benchmarking inltiativu.

I was approached by an employee of a competlor at a conference. We started chatting about a talk that had just been glven. Then she brought up a new product her company was launching. Should I continue the conversal1on?

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VIE CONDUIT OUR BUSINESS WITH INTEGRITY

Third Party lntellectual Property

We respect the lrrtellectua! pioperty righa ôf indlvidua!s arid œmpanies.outsidè of Cargill. We do not attempt to obtain their œnfidemial infonnation ör.otherwise uee their intelJectual



WE CONDUC T OUR BUSINESS WITH IN TEGRiTY

Trace Sanctions

Numerous countries and organizations, such as the Urited Nations, impose trade sanctums. They may be against certain countria, organizations, entities or Ind vfduats. Many trade sanctions apply to transactions done outsid= the borders of the country imposing the sancton.

Some trade sanctions ban &l transaction:s with a particular country. Others may ban only certain types of transactions, sue-h as trad'ng in specific goods or seivises. Review CargiII1 Trade Sanctions Policv for guidance.

Cargill does not do business with any sanctloned country, entity or ir'divIduaJ, unI°ss permitted by law. If youi work irivoIv=s an irrternational Fansaction or other bus:ness that has the pot=ntiaI of 'nolating a sanction. you must.

Famiiiarize yourse!f and compiy wñh an.y applicable sanctions

* + Avoid doing buslness w th any sanctioned country, entry or individual, unless permitted by law
  + Consult with the Law Department before you even cons der any dusin=ss with a sanotioneci country. entfty or individual

Trade sanction laws aie complex artd change frequently and rapidly for foreign policy purposes. So. a transaction that was allied before m'ght be Illegal now. Gonsult the Law Department and available or+line resources *repa\arIy.*

y REPORT A CONCERN



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

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OU.R. CUS.TO MERS’ ,TR.ÜST

# We Keep Accurate an.d Hone:st Records.

Accuratë. ańò honest FOCCiFÓ5 ô£O Critical tö rnăkihğ söund busińess deciëiöns ang maintaining the i'ntögrity öf óur

financial reporting. Öur business.information, in whatever form, must reflect the true nature of our transactions.

Creating and Managing Business Records

Eve'ry.day. wè create thousands:of buèiness réctirds: Thóśè Mary from custómer cõńtracts a d 'repörts for fegulatöry. agencies, to timœheets .and .expense.repoîts. At-.times, our email and te!ephone

cõmfńunioations become busineśs records. Wë coùnt on their.'acc uracÿ, cömpletenesś ańö truth to analyźe' ănd iëpört.on òür ôperatioris ańô.țo make sownd business. decisions. Any buśiness.resord could become public.thróugh litigation, a govemmént ifwëstigatiön ór à media inquiry.

For these reasôns, .all business recordś we create, in vyhätever form,

must reftëćt.the:trúe raturë of trañśaćtíònś' and events. Néverfałsify

a record.or try tó 'disguisë whät rea„IIy happœed. Ävöid exaggèfatiön, colorful lariguage.and legal conüluslons in.ali your communications.

Under I+õrmaJ circurnstarices, wë fółło'w öur records ïêtentigń schedclœ when deciding whicł+ records to:keep and which to:dispose ôf. But:there may be exceptions to this schedule; such 'as litig'atiòn õr 'a gòvëmmeńt in'veś\ig&oñ. So óe súre tö ask if in döubt.ãnõ f.oIIów'ãny instructio/ñs you receive.

I aim cIaan'ifig my o1Tice sğace. ăñ'd see a'box:öf papefwõrk that Iś due fõr shredding according to *o*lu*r* record retenfion policy. But just heard there is a p'enõing client matter- at my workğlace. What shoulò I do\*

*Dofi”t śe”nd* fhe:õox'For *shredding.* Corïsu/ż with Me law Oepartment I‘o see 'it *any of tti•* õocumen/s inside show/Ö öe

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WE KEEP AC CURATE AND HONEST RECORDS



y REPORT A CONCERN

Financial Statements and Controls

We use our financial statemmts to prepare government returns and reports for tax, regulatory and stahstcal purposes. We comply with applicable accounting rules when compflfng and sharing our financial Information. We prepare and fiie our tax returns ar'.d other fii:ngs in accordance with ail tax laws.

It your job involves supplying financial 'nformation to the controllership organization or the Tax Department, you must ensure It is tsmely You must aiso certify both the accuracy of the

›nforrrtaton and vour compliance with Cargill policies. Failure= to

provide timely and accurate information in these cases can result

›n sqni\icant leoal and commerc.aI nsk ior Cargill. Contact the Tax Department fcr tax-reIat=d questons and your oorttrolfership resource for finance-related questions. Review Gargill’s

Financial Statem=nt Controls Poi:cy for guidance





We Honor Our Business Obligations

Oùr.business re!ationships are grounded in mutual trust:änd. hâve beeri throughôut’OarqIÏI’s histöry. We buÏld and rnaintain the’trust and confidüùce.df our.custömers and other business pärtners by comrnunicating honestly; respacting infaFfT Btiön entrusted to us'and stancting behind our commitments.



WE HONO R OUR **BUSINESS** 0 BLI GATION S

y REPORT A **CONCERN**

Trust in Business Relationships

Hononna our obligations to our customers and business partners goes beyond just meeting our ccritractual responsibiii0es. The mutual trust we have

‹n our business relationships wrth customers, srippliers, vendors, consultants, other business hers and one another means something much more.

Maintaining the mutual trust of our business relatiorishifis reguires that we:

Communicate honestly

We communicate honesty about our products and services. This includes our conversations, contracts, sale matenaJs, emals and all other communications.

Source responsibly

We wor'< with suppi.ers wnose values align with our own and we

*expeofi* our suppliers to follow our Supplier Code of Conduct.

Make commitments we can fulfill

A commitment means any prom.se, not just those in our

Respect and protect confidentiality and ownership rights We protect intellectual property entrusted to us as *d:'IigentIy* as we protect our own.

Treat persona1 information with care

We may collect, hold or process personal information of our customers, suppliers, dig'taI application users oi others outside= of Gargill. If you handle such information, make su›e it is projected and used lawfully and properly. Review Cargfll's

Oata Privacy for Business Information Po'.cy for guidance.

contracts. Oon”t overpromise and oommit to someth ng that

Marg.II can't deliver.

*Ana* iaandle changes to commitments responsibly

If we won't be able tc meet a commitment we have ma¢le, work v/rIh the affected customer or busines partner to find a

solution and discuss appropriate nd steps. Maice sure= ex:sting contracts are p+operIv changed {am=nded) or terminated,

if needed.

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

he/\* rfie *affected* customer or *business partner right’ away’. No one wants to miss a deaclIine, but i'It worse when the* d=/ay” is not mauepe¢f props/y. Do w'hat jrou can to reduce be /'mpacf of be o'e/a¿. Keep in m/no Mat *changes* fa lie contract may be necessary.

A

WE HONO R **OUR BUSINESS** OBLI GATION S

Government Contracting

We conduct business wrth 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 fhose 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 irrforrnation about our company and shareholders under these contracts may be necessary, too. And basic sales- related communications may be regulated when government offlials are involved.

If you work on government **contracts,** make sure you:

y **REPORT A CONCERN**

Fully understand the special IegaJ rules and contract terms that apply to that customer relationship

Know which contract requirements apply to third parties, like consultants, resellers, distributors or suppJiers

Know the third party is aware of the requirements and can meet them

I'm assigning one of my t•.ams a project that involves a governnier+I 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\*

*Absolutely.* +overnmenf con‘mcL have a lot of specia/ *requ/'remenLs* tialo/fier con/rac/s *do not.* Gel *the* Law *Department involved anâ ensure mat the team ancl any hnfi* /xtrf*ies you may be work:ing witfi I‹now anoui’ tfie .”urns that apply “o* the *contract. Specific oisc”!osures* mav be *required. Government contracts aiso typically have rules sound sales. gi”ts and 0ri'oerv that“ are mole rigio than thafie* t/ia/

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OU.R PÉO PLE

### We Treat Our Employees with Dignity and Respect

We achiëve our ğoàls thrôugh our’peõpIe. We providè ă.safe wõrkplacë änd valuë the unique contrtbutións of õur global team, enabling those who support.CarqiII’s goals to achiBve their own individual potential. We are committed to respecting:the human rights of Carq!ll employees and äll those whose livelihoods we tõuch.

Health and Safety

We.believe.ał1 jobs ego be dońe safely. Workplač'eś' with ze+a injunps and (ata!ities are.possiöle..Ensuriñg.e\n ryo'r›è.returns hõrnë'safely fro'm work every day is core.to our operations. We expect an unwavering commitmerit to th'ese gõałs fióm all Carg:II leader's, empfoyèes-aod' odütrãctom.

This commftmerit requires that we:

* + Cófriply with all 'health and.safety laws

Compiy with our own sałëty ïequirețrients thàt often go beyońd the legal ories

Continuously imprõŸe our safety performan.ce through &ming' fforñ others, bõth in'side ar+d outside.our ó janizatlöri

Mtabliśh aggreśstvë safety aöalś:

Recognize people:for imp+oving safety processes

Insist ón a.culture:that reqúires all wörk, however urge I, be done safelv



All'employ müst ,follow heaIfh *àn'd* sãfety laths acid cömpăny

£ØC|UiŒ II £• ÎS Watt 8|g]DÏŞ tÔ !£ jOÓS. F CEUR sCrNS tO

pròtëct ÿüürśelf; you'r feIJo'w . mpIòyëes'ãri d viśilors. Report.any indidèrits, unsaîè pfactices.õr se.curity 'iss.uœ'yôu witnëss îo your mar.ager..Ğargiil maîtagefs must ensure that everyone they supervise receivëś: bainiñg, prograrnś and ïësourceś to do their

tobs.safelÿ. They must alsö ensure.that thë dësign and processes of õur facilities enable:safe working condition.s.

Rèyiew Cœgïll's Envirónrnènt, Heălth ańd Safely Pölicy ąnd.the. Cargtll EHS Põlicy Manual for..guidance::

y REPORT A CONCERN

WE TREAT OUR EM P LOYEES WITH DIGNITY AND RESPECT



Otir commitment to human fights is fundamental to our Guiding Principles. Respecting these rights aligns with our values of doing the right thing and putting people first Our Human R-ghts Po'icy ensuies

Gonduct our business activities whlle keeping in mind the Stealth and safety of those whose lives we touch

Respect the rights of workers to form or join a legally recognized Jabor organization, rf they choose, without fear of reprisal, intimidation or ftarassmerrt

Treat all workers with dignity and respect, and provide an emotionally and psychologically safe and Inclusive working environment

Provide competitive. falr and equitable pay, which includes a living wage that supports our employs and their families

* + Comply wrth applicable walking 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 eLhnic or minority groups

WE TREAT OUR EM P LOYEES WI.TH DIG NITY AND R ESPECT



Strength Through Diversity

Cargill embracés the variety of b'aćkgłounds and (îfe experiènc eś

öur'émpIoyeœ brińğ 1ó won Our vvórłdorce ..

perspectives of a lot: of diflerent social groups. :Tłæy include. genderś. languages, focøl cüstorńs, phÿsiœf ãbJlitiës, iacès, réligion's„sexuaf:órientationś, ğèrider ideritìties,' lrfe eżperióncës arid socio—economic.statuses. We aiso vary in our personal.styles of thinking, axprëssiog öursetvëś ănd probJërń-solvirtg.

As a vital part:of óeing-a successful and èfiective global orgariizãt:'õn, w'e.

Respect the diversity öf humanity

AoepŁourdiFœAnces

Recognize that òür owo waÿ of thinking Jś 'nót the ónly way

Ackrtowledge that 'tń'e' dive' rsó viewpoints that 'reśuh from varied baclcgrouńds ãre not weaknósses but ąre Iñ fact strengths

* Serve!tŁte:needs of ôur ğlobaJ. órgãnizatión and dŸerśè customer base

We provide equa! employment opportunities to all existing and prospective emğloyees. This fTieãns.wë make our empioymènt”dećiśionś' wîthöut regard to. persorial characteistics, sucÏi æ rače, .ethnicity, coİòr; .gender; agë, disability or other charactei1stics protected: by law. Illegal disci1minatioa and'retaliation against anyo'ne:for' either sharinlg a.ponœm, rëporting' rniscondúčt, or p'artičipatinğ in'an invœtigatiöri arë.not ,tolerated at CàiqiJl. This appliœ to the way we treat each other, our customers,:md anyone with whõm we irrterãct or'do..buśiness.

Review Cargill's Globa AriIi-Disaimination Policy and the

anti-diśčriminatim’equal empJoym'errt:oğportu'nity policies ät' ÿörir İocatiõn for:guIdance.

I supervise. an employee.who recently conveîte'd to another reiigion:'We used.to .belong to the same. congregation, and.I dond agree with fler decision. She is asking.for time óff for religious observance. What.äre.my obtigätìans here2

A *religious oö* se *mance.* ft *wo.uld oe.* art ***A v* se *of*** *your fraction i‘o aiseriminale or narass tier. in any way betause you OonJ agree'w”ith. her äecisio'n to converL We respect each õtlJér’s reIigIo'us* c *foices,* even /f Wi=v confrbst wM Our oi+'n.

y **REPDRT A CONCERN**

WE TREAT OUR EM P LOYEES WITH DIGNITY AND RESPECT

Harassn ent

We do not to!erate harassment in any form. This applies tc how we treat each other. our customers. artd anyooe with whom

we Interact or do business. We conduct ourselves rn a manner

C Onsistent with our values of putt'ng people first and do›ns -•

rght thing, and we adhere to applicable lav/s. Review Cargill’s ñlodal 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 L'n=.

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

A ***These*** ßetiariors are u.nacceytaOfe ans mcv afso constimte

*zelne! ' ri*ara*zsmerit, which* ls *p*m*m*= *hiD d Oy Caigiil’s po!iües.*

*You should Sport ttiese Deüaviois io your manag=r or* Human Resources, er t:'y *suDmitt'n9 a ticket mquezt thtouph Myi-IR of an ALtncz Op*e.*n Eine* repo0.

y REPORT A CONCERT

WE TREAT OUR EMPLOYE ES WITH DIGNITY AND RES P ECT

Violence-Free Workplace

Everyone has a right to wor’< In a safe workplace.

This inc•udes one that is free of acts and threats of violence. We do not tolerate acts or threats ot vio.enoe by employees or third parties. We take all reports of vioJence seriously.

Everyone must hip maintain a vio!ence-free wcrkplaœ. In cases oJ imm.nertt danger cal! the police If you experier'ce or witness an act or fhreat ai violence, report it to Human Resources. any manager or the police. Yon may also use MyHR or Cargill's Ethics Open Une.

Review Cargill's Vio'ence-Free Workplace Policy for *guidanœ.*

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

*Yes, tfie tfiieat and* //ie /nNmic/aMg *fist sIarnmi.ng* wau/d a// *fall under the pmlfiiDition or violence unôer our Code.*

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WE TREAT OUR EM P **LOYEES WITH** DIG**NITY AND RESPECT**

y **REPORT A CONCERN**

AlcolaoT and Drugs

Cailgill provides a safe and secure worlcplace. The misuse of drugs, alcohol and other controt!ed substances on the job or at job-related events is prod bited.

We expect employees to be free from We influence of intoxicat'ns substances while worlung on oLfr behalf. Manufacturing, soliciting. distributing, possessing or using unauthorized drugs, alcohol and other controlled substances a1 Cargill locations

is also pi ohiGited. Alcoholic beverages may be served at company-approved social functions io accordance with cur drug and alcohol policy. If you are taking prescription rnedicat‹cn tha? could impair your abilrty to work or pose a threai to safely, consult with Human Resources, your manager local Environment. Health & Safety personnel and/or the Company rned.cal service (where 1 extsts;i. Your prescription/medicaJ inform.ation will be kept contdential. in accor¢iartce with

Review Cargill’s Alcohol and Drug Policy for your location for guidance

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

*We cafie about the well-being* o/’ a// our *erup/o\ee°. We cannot,* o/ course, *toI*e/ *a‹“e dn'nking alcohol on* tne *joo. 9ut we* ego *ofter nelp for thou-e* w/?o are ready to receive /t. Consult with the Humao Resources Department for *resources to share w'th the employee.*

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OU.R. C OMPANY AND COMMÛNI TI ES

### We Protect Cargill’s Information, Assets and lnterests

We count ün öñ.e anöther to äct..as.Sti3wards.of thè ofgänizaüö'n. To..prese e thè value of:Cargill,

we protect the Information and assets entrusted to us and avoîd situations that may Jet personal interests inftuëncè ôür business juctgrnent.

Cargill Property and Resources

We protéñt Garg11l’s property and resources..These include both o'ur phy'sk assets, soch'as air facilitiés;'materials.and equipment, as well aa our communication systems, svch as our

oïziputen,. lftt'ernet s'erVicë; telephonës-art.d.prrfaJI.

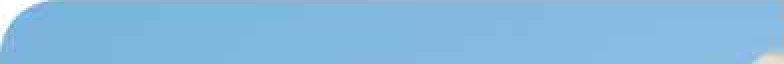
Employee Data Privacy

We may collent, hold or pmcess personal information for

.empIöyrnërrt'purposes. Wè hândle this-iriforrriät‹oñ lawfully an'd prôpeily,'and p'rötùùt' it from di sÏösure.. Review Cargi1I’s'. Data Privacy.för EmpJoyment' Information Policy for gLtidartce:

WE P **ROTECT CARGILL’S** INFORMATION, ASSETS AND INT ER ESTS

y **REPORT A CONCERT**

 Cargill lntellectual Assets

*Amerg* Cargill's most valuable assets ›s our inteiiectua! property. This includes oopynghts. patents. trademarks and trade secrets. Uniess you know information may be disc osed, assume it is cónfider+that.

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 kriow it.

If you cfeate or invent things on the |ob. make sure you understand how to prot=ct ltte intellectual property that resu!ts from your work. For instance. you may need to keep records, report on research and development or assist w:th obtaining patents or'. behalf of Cargill.

Review Cargill's CG|gÿright Policy, Trademark Po'›cy an.d Gonfiderrtiat Inforrriation Pollcy for guidance.

I have found that someone has left a file in our break room containing a detailed customer list. ft was not mark•.d confidential. What should I do?

*Even Lough 'ñ is not marked* as such. *treat“ i't as .onñden lin! and*

A

re*port* what yoi/ /ourO *to your manager. <^ cvztomm 1s• ia o tfpicvt*

«/nd *of tr*ac *e secret M I would* Oe *usehal to ‹::ompetiIois if discovemo. Ttiut’s valuable i'riforniati'on and* a disclosure *could* cfep/ete /ts w'oW.

**WE PROTECT CARGILL’S INFORMATION, ASSETS AND** INT ER ESTS

y **REPORT A CONCERN**

Insider TraaJ g



* Trading on "material nonpublic information" about thtrd-party or partner companies with publicly tladed sec‹Jrities (including debt securities)
* Communicating “matenal nonpublic information™ to others in violation of the law

Th s conduct, commonly referred to as ’ insider lrading," is illegal in most piac='s. It can fesult in severe peraities for both you and Carg II, =.ven if you do not profit from the violation.

Information is "material" rf it is likely a reasonab.e invator wou!d consider i1 importarrt in m ng an •nvestmer't decision.

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

Y'es *Our Cocle prohibit: stiaifing material, nonpublic*

A

*in fa rm a tlo ri witfi an',‘one, such afi* yoL/r O/Otner *Since tfiat*

person *coulo' tfien* subsequent *bade on tfiat information, wtiich is against* the law’. *Consequences for insides tradi.eg can* inc/uc/e *significant* crimrr'ar *and* financial *penaIb”es. fiio,* you *should not* sfiare sucn /nTormadon.

Derivatives Transactions

Cargill enters into derivative transactions; including futures, swaps and options. through+out the world. \/\/= enter these transactions on oroaru'ed exchanges and bilaterally with counterparties.

Personal tradirig :n commo-dity derivatñ’es 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 dssc!o-se your intent to make these trades and obtain approval fmm your manager. group or function !eader and from Derivatives and Commodities Compliance (DCG).

In addition. do not trade any other product that could create a conflict of interest \vrth your Carg‹ll responsibilities, ithout first disclosing the trade and r ivino prior approval.

Consult wlth our Policy on ErTip!oyee Trading for further guidance. Cargi1I's Denvatrves and Commodifies Compliance (OCG) team also provides inform at on and resources on derivatives anti commodities trading on

My Gonnects under Function+s Law Ethics & Compliance —>• Denvatrves & Commadities Compliance. EmalI questio-ns or requests to deri\[’atives-comp'•ance@oargiII.com.](mailto:ance@oargiII.com)

**WE PROTECT CARGILL°S INFORMATION, ASSETS AND** INTERESTS

###### Convicts of Interest

We avoid situations where our pesonal interests oould inappropriately Influence our business judgment or even simpiy appear to do so. These situations are called "conflicts of Interest," because there Is a conflict between personaJ and job-related Interests.

Examples of stations in which a conflict could exist include:

* Outside employment, such as working for a competitor or competing wrth Gargill

yvith a side business

Perso-nal relationships, snort as hiring a fami!y member as an employee or a vendor

* Business opportunities discovered on the job and used for your own gain Instead of Cargill's

*Gi* fts 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) relatfo-nship

It's r+ot always clear whether an activity creates a conflict of interest Cor+suit with your manager or the Ethics and Compliance Office if a oorrflict appears possible.

We most disclose all potentia! conflicts of interest, even when yve are unsure about whether they are corrflicts, so that we can confirm rf they are actual conflicts and how to best manage lhem.

Review Cargill's Conl1iots of interest Poi\cy for guldance.

RERDRT A OOIgCE RR



I am on a ganel to choose a new supplier. My sister-in-law has invested in one of the suppliers and *woula* stand to benefit If we selected that supplier. Y\fhat should 1 do?

D›scJbse *your* sisier+'n-lab investment as *soon as possible to your manager or otfier apfi›ropifiate* personne/. Y0u' may neecf la recuse yourse//

A

*from* the pooe/ over /fi/s déc/'sion. N//ien in c/oudt a0oot whether a con///cf of /rr/eresf exists, a/n'ays c/isc/ose *as soon as* passid/e.

# We Are a Responsible Global Citizen

y REPORT A CONCERN

The breadth of our operafions means that C:arq!1I touches almost every aspect of society. With our global reach comes thB responsibility to understand and manage our impact. We maintain stnct environmental and food safer standards within our operations and share our global knowledge and experience to help meet economic

and social challenges.

Managing Or‹r Environnsentnl Footpri st

We manage our =.r'viro-nmeutal impact and help conserve raturaI resources. We comply with environmental laws and our own strict requirements to impro\•= our performance. This incJudes.

Dihgerit review of enmronmentaf impacts Waste minimization

* Elficierrt resourc= use

We evaluate the environmerrta! impact of and obtain all necessary permits and approvals before making substantial changes to our business, such as a n=w p!ani or a major capital project.

All Caraill employees must follow applicab!= environmental laws and company requirements. This includes prompt responses to, and mitigation of. any impacts of environment.al incidents or v'oIat!o-ns. Our managers must make sure employees have the traning arid resources to help me='t these responsibilities.

Review Cargill's Erv'ronmerrt, Health and Safety Policy and the Cargill EHS Policy Manual foi gui¢!ance



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WE ARE A R ES P ONSIB LE GLOB A L CITIZ EN

y **REPORT A CONCERN**

FDOd and Feed Safety

We haven a commitment to produce safe load and feed every time. ev=rywtiere. Cargill has a strong food safetv culture throughout our system. This includes an external supplier venfication program, a robust food safety plan in each facility, and sa ary transportation require/Tients.

All Carg‹ll employees are responsible for load and feed safmy. Our facillty managers make sure employees have the necessary training and resources io carry out this responsibility. We= share informat.on on food and feed safety both internally and externally, and encourage our employees to bring forward good ideas.

Review Cargill's Product Safety, Qriality and Fi=gu!atory Poiicy

and the Cargill Food 5aJety Pole Manua' for guidance.

My business operates in a developing country and competes with companies that don't have Cardiff's sti ict food safety reguirements, putting Cargilf at a competitive disadvantage. Can we just comply with ttie laws of the developing country?

Ago. Because *vie to ucn tfie giofial i”ood s upp/ onain in so m.any woos anD places, we purposely lake a* stronger.

A

*comprefi‹ensi*ve *app roaofi to ensure the safety oT our food*

ano' leech produ'c?s.

y **REPORT A CONCERN**

WE ARE A R ES P ONSIB LE GLOB A L CITIZ EN

Enriched Col en unities

We apply our expertise to help meet the economic, environmental and social challenges of our commrinrties. We wor'x with a wide range of public and pñvate partners. Together. our peop'e and businesses c-ontribute time, talent and financial resources to address the di|frcuIt !ssues that no a-ne aroanization alone can solve. Th!s 1s part at beirg a responsible global citizen. We hold ourselves to high standards anc! wcourage others to do the same.

Contact your local Corporate Responsidiiity Team for gu:'dance on how your bus:ness or function can support worthy protects in our communities. Review Cargill's Chantab!e Contnbutions Poiicy for guidance.

Political Activity

Cargill wpects the ngñt of cfs employees to participate in the polittca! process and :'n any political activities they choose. But employees must .keep personaJ political ac vrties and views separaf= from their work ior Cargilt. Do not use Caraili’s resources, like our faciiit.es,

=mail or tad arks. for vour own pal:tical activities. \/‘Ie must avoi¢! giving any impr='ssion tfiat Cargill suppo-rts any political via that you happen to ho•d.

Corporate political actrvrty. Including contribut.ons and lobbying, s highly regulated. The Governmerrt Relations team manages Carg iI's political vities. Businesses and functions should contact Government Refatons for revie'w and approval before ma ng arry political cor‘.tribution on Carg:II's behalf. These contribut!ons may de :'n support of a

didate, party. campaign, public official or ballot .ssue, or to further a lobbying activity.

Th!s helps ensure that political activities on behalf of Caroi:'i comply w.th the law and support the organiza0on intents.





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



The Ethics and Compliance Office al ethics CargilLcom

You may also submit a confldential report vla Ca@ills Ethics Open Line, available 24 hours a day,



