

# Supply Chains Act (Canada) Report of Cargill Limited and its Canadian affiliates

Joint Statement – Cargill Limited – Cargill Limitée, Precision Agricultural Services Inc. and EWOS Canada Ltd. for the period June 1, 2023 to May 31, 2024

This report covers the activities of *Cargill Limited* (“**Limited**”), *Precision Agricultural Services Inc.* (“**Precision**”) and *EWOS Canada Ltd.* (“**EWOS**”) (Limited, Precision and EWOS are referred to herein collectively as “**Cargill Canada**”) and addresses our efforts to understand and implement actions to minimize the risk of forced labour and child labour in our Canadian operations and their global supply chain. It also includes general information related to policies of our parent company, Cargill, Incorporated, that apply to Cargill Canada, and activities of Cargill Canada’s foreign affiliates worldwide, which form part of the Cargill Canada supply chain. “**Cargill**”, without qualification, refers to the global Cargill enterprise consisting of *Cargill, Incorporated* and its affiliates worldwide, including Cargill Canada.

This report is Cargill Canada’s second report filed pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act. It confirms relevant policies, processes and measures applicable as of Cargill Canada’s financial year ending 31st May 2024, only 5 months after this legislation came into effect.

Cargill’s purpose is to nourish the world in a [safe, responsible and sustainable](#) way. Sitting at the heart of the global supply chain, we join farmers, ranchers, manufacturers, foodservice customers and retailers in sourcing, making and delivering products that are vital for living. Every day, our 160,000 team members come to work:

- Driving to improve lives through food, nutrition and health
- Looking for ways to innovate with purpose
- Committing to nourishing our growing world by providing access to life’s essentials

This is how we create new opportunities for our customers to grow, communities to prosper and consumers to live well.

Human rights are fundamental at Cargill. In Canada and throughout the world, our actions are driven by our values. We are committed to respecting the human rights of all whose lives and livelihoods we touch. Cargill complies with local laws and respects internationally recognized human rights throughout our own operations, supply chains and the communities where we do business. We take guidance from international standards and declarations, including the United Nations Guiding Principles on Business and Human Rights (UNGPs), the International Bill of Human Rights and the International Labour Organization Fundamental Principles and Rights at Work. As a signatory to the United Nations Global Compact, we also are committed to promoting human rights.

The most fundamental steps Cargill has taken to prevent and mitigate the risk of forced and child labour in its Canadian supply chain and production processes during the reporting period are listed as follows: i. the implementation of policies prohibiting forced and child

labour, including our Code of Conduct, Human Rights Policy, and Supplier Code of Conduct, ii. the creation of a due diligence process for selected products and geographies, in a stepwise approach to identify, assess and mitigate risks, and iii. the enhancement of our Human Rights and Environmental Grievance Process as part of the due diligence process as outlined in our [Human Rights Policy](#). These steps are further discussed below.

## Guiding Codes, Policies, and Procedures

Cargill's [Code of Conduct](#) outlines our company's ethical and compliance standards for conducting business throughout the world and serves as a guide for employees in conducting their daily work. Our Code is grounded in [seven Guiding Principles](#) that are ingrained in our culture and serve as the foundation for the behaviors expected from all employees. Guiding Principle #5, "We treat people with dignity and respect", addresses our commitment to human rights. It expressly states that Cargill will "Act to eliminate any form of forced labour – and work to eradicate child labour – from our own operations and supply chains".

Our [Supplier Code of Conduct](#) extends our seven Guiding Principles into the supply chain and is translated into nearly thirty languages. It requires suppliers, farmers, producers, manufacturers, and other business partners (each a "Supplier Partner") to work with us to fulfill our purpose – ethically and in compliance with applicable laws. When selecting our Supplier Partners and extending an existing business relationship, we consider the expectations imposed by this Supplier Code of Conduct. The Supplier Code of Conduct enlists our Supplier Partners in upholding the same principles we expect of our employees through our Code of Conduct. We believe a joint commitment to ethical conduct and integrity is a strong foundation for trusted business relationships that create shared value.

Our [Human Rights Policy](#) further outlines our commitment to human rights within our operations and supply chains and is translated into more than 20 different languages. We also expect our suppliers and business partners to uphold these principles and urge them to adopt similar policies within their own businesses. Cargill expects Suppliers to uphold the principles outlined in Cargill's Human Rights Policy and take guidance from the International Labour Organization Fundamental Principles and Rights at Work. Cargill requires that Suppliers act to eliminate any form of forced labour and work to eradicate child labour from their operations and supply chains. Our **Human Rights and Environmental Grievance Process** provides a framework for stakeholders to raise concerns related to human rights.

We also have policies for specific commodities, as discussed later in this report.

In addition to the information below in this report, more information on the actions we are taking in our supply chains can be found in Cargill's [2024 Impact Report](#), which identifies forced labour and child labour as salient human rights issues for Cargill.

## Forced Labour

Cargill does not tolerate the use of any form of forced labour – including all prison labour, indentured labour, bonded labour, and any forms of modern slavery or trafficking – both in our own operations and supply chains. Cargill Canada complies with Cargill policies and applicable law. Cargill's [Code of Conduct](#) and [Supplier Code of Conduct](#) require the following:

*Respecting the terms and conditions of employment with transparency:* Terms and conditions of employment are communicated to workers in a language they understand, and changes are communicated transparently. All workers are free to terminate employment upon reasonable notice.

*Allowing workers to have freedom of movement:* Workers have the ability to move freely and are not restricted through abuse, physical force, or threats of violence or reprisals.

*Recruiting Responsibly:* In accordance with the Supplier Code of Conduct, when Cargill Canada recruits workers internationally, we comply with Canadian law and follow the United Nations International Organization for Migration (IOM) IRIS Ethical Recruitment standards. Employees do not pay recruitment or similar fees to obtain employment. The costs of recruitment are borne by Cargill Canada. Further, temporary foreign workers are accorded treatment and protection equal to other workers and retain control over their personal identification documents and other valuable possessions.

## **Child Labour**

At Cargill we work to eradicate child labour from our operations and supply chains. We implement appropriately designed due diligence systems that are intended to identify, prevent and remediate child labour in our business and supply chains. We will not hire individuals under the legal working age or in conflict with other legal restrictions. Cargill only employs workers under the age of 18 in accordance with applicable law and will not assign them work that is mentally, physically, or socially dangerous or that deprives them of the opportunity to attend school. We expect our supplier partners to uphold the principles and due diligence obligations outlined in Cargill's Human Rights Policy, including working to eradicate child labour from their operations and supply chains.

## **CARGILL CANADA – Structure, Operations, Supply Chain**

Cargill has conducted business in Canada since 1928. Limited, the key flagship operating entity for Cargill in Canada, is a privately-owned Canadian company headquartered in Winnipeg, Manitoba. It conducts business from more than 80 Canadian locations and employs over 8,000 people across Canada. Limited is a subsidiary of Cargill, Incorporated, an international provider of food, agriculture, and risk management products and services. Limited, primarily an agrifood business, is one of Canada's largest merchandisers and processors. Our interests include the processing of beef, poultry, chocolate and oilseed, and the manufacturing of livestock feed. We are involved in the distribution and sale of food and food ingredients, bioindustrial products, road safety salt and crop inputs products. Grain handling and merchandising continue to be a core part of our business.

Precision is a subsidiary of Limited which operates four crop input retail locations in Saskatchewan. EWOS, also a Cargill-owned company, manufactures feed for the aquaculture industry at its facility in Surrey, British Columbia.

Cargill Canada's operations are divided into the four enterprises, each with multiple businesses and supply chains. Further information on these businesses and their supply chains for the reporting period from June 1, 2023 – May 31, 2024 are provided in Appendix A.

## Due Diligence and Remediation Measures

Cargill Canada took steps in addition to the policy framework discussed above to assess and mitigate forced and child labour risks during the 2024 fiscal year, some of which are discussed in this report.

Cargill began implementing its [Corporate Due Diligence Policy](#) in December 2023. This policy articulates our due diligence process for identifying risks and working to ensure our products are compliant with our other policies and legal requirements. We integrate a variety of tools to assist us in our due diligence, which depending upon the product and geography may include partnerships with our supplier partners to conduct on-site visits, certifications, grievances reported via our Ethics Open Line, and information from third party sources – including governmental authorities, international nongovernmental organizations (NGOs), and consulting experts. Some of these tools are discussed below and in the next section of this report.

Foundational to Cargill's strategy is a risk management process to proactively identify and manage human rights impacts. We are continuously enhancing as applicable our human rights due diligence program to identify, prevent, mitigate and account for human rights impacts in our operations and supply chains.

In our global supply chains, Cargill seeks to reduce the vulnerability of children to child labour by supporting farming families and producers through prevention efforts such as enhancing income generation and access to education and employment. Our integrated approach combines prevention with a supply-chain based monitoring system and is supported by a network of community development activities to address critical needs.

In select high priority geographies, remediation of child labour is provided at both the individual and community levels by Cargill together with NGO and governmental partners. We believe it is essential that all parties in the supply chain – industry, government and nongovernmental organizations (NGOs) – work together to address these complex problems, support rural communities and ensure children and young adults are not subject to these conditions.

We are taking actions in our supply chains to prevent and address illegal, abusive or forced work, which in Cargill's FY2024 include the implementation of Cargill's Corporate Due Diligence Policy to identify and manage human rights risks in our operations and supply chains. This Policy was implemented in high-risk regions and value chains, which involves a four-step approach to identify and assess, act, track, and report on issues via abstract and concrete risk assessments.

## Key Risk Mitigation Programs Applicable to Cargill Canada Global Supply Chains

Cargill Canada has Cargill Animal Nutrition & Health, Cargill Protein & Salt, Cargill Cocoa and Chocolate, and Cargill Agriculture & Trading as the key enterprises, as described on Appendix A. Cargill has taken a risk-based approach to address forced and child labour in its operations and supply chains based on the industries and geographies of its value chain. Cargill Canada has prioritized efforts addressing the priority human rights salient issues of child and forced labour through various initiatives. Cargill Canada's initiatives are tailored to the particular products and their supply chains. Programs applicable to Cargill Canada's global supply chains operating in FY2024 include the following.

## Cargill Protein and Salt

- **Protein**

- Our Protein enterprise conducted third-party audits with SEDEX for their own operations and on-site sanitation companies.
- Select Protein facilities in Canada have recruited skilled migrant workers from outside of Canada. In these cases, we align with the International Organization of Migration's Ethical Recruitment Principles. We connect our workers to affordable housing and make them aware of community resources and local services to facilitate a smooth transition. We provide on-the-job training while also recruiting experienced migrant workers who are already trained in skilled labour, specifically industrial butchers and meat cutters, filling skills gaps in the local workforce. Cargill Canada does not employ unskilled migrant workers.
- Due to an identified risk of child labour within the U.S. meatpacking facilities in 2023, Cargill continues to reinforce its stringent supplier verification procedures and protocols in our U.S. protein business, including adding a visual inspection requirement by our management team of suppliers' employees on our worksite to identify age concerns. These risk mitigation procedures benefit our Canadian protein supply chain, which sources from our U.S. facilities.

## Animal Nutrition & Health

In FY2024, our Animal Nutrition & Health (ANH) enterprise conducted internal assessments of forced and/or child labour risks in their activities and supply chains, designating certain regions as 'high risk'. Following an internal assessment of potential forced and/or child labour risks in our supply chains, our Animal Health & Nutrition enterprise commissioned human rights impact assessments by two expert consultancies for some of the designated 'high-risk' regions. The objectives of the assessments were first to identify actual and potential impacts on internationally recognized human rights that the enterprise causes or contributes to, and those it is linked to, as a result of its operations, products, services, and/or business relationships. Additionally, the assessments helped Cargill set a framework to mitigate and remediate, if necessary, negative potential impacts. For all suppliers in non-low-risk regions, ANH continued to engage suppliers through its [ANH Sourcing Policy](#), requiring these suppliers to acknowledge the need to comply with our human rights requirements regarding forced and child labour.

## Cargill Food & Bio-Industrial

- **Cocoa** – As part of our Cargill Cocoa Promise, Cargill is committed to protecting the rights of children, raising awareness of labour issues and improving working practices through training and education of farmers, their communities and families. To address the root causes of child labour, we are combining our Child Labour Monitoring & Remediation System (CLMRS) with preventative measures such as community development, women's empowerment, and opportunities for youth. The steps of the CLMRS are as follows: field agents visit households and farms to conduct surveys during school holidays and harvest season; the data collected allows us to identify the

number of incidents of child labour, the type of activities carried out by the children (such as using machetes and pesticides or carrying heavy loads), and vulnerability factors in the household as causes of child labour (such as school attendance); based on the data collected, a remediation plan is developed that includes direct remediation activities for the cases of child labour identified and broader activities to address potential endemic root causes.

- **Palm** – Cargill has a global [Policy on Sustainable Palm Oil](#) through which we monitor our suppliers' compliance with our guidelines and industry-wide frameworks using a supplier questionnaire and verification process.
  - In Indonesia, we engage with suppliers through visits, assessments, and workshops.
  - In Malaysia, Cargill works with [Earthworm Foundation](#) in an effort to improve labour and human rights practices through the Labour Transformation Program. The program's goal is to generate long-term engagement with suppliers and improvement on prevalent social issues, including recruitment practices, employment contracts, grievance mechanisms, freedom of movement, freedom of association, wages and working hours, health and safety, and access to safe accommodation.
  - Our [palm grievance dashboard](#) is publicly available. We prioritize engagement based on varying levels of severity and impact. When a supplier is unable or unwilling to make progress within the agreed upon timeframe, or has repeated non-compliances, we remove the supplier from our supply chain.
- **Soy** – Cargill also has a global Policy on Sustainable Soy. When stakeholders raise concerns about suppliers' practices, we work to address these concerns in a timely, equitable and participatory manner to ensure progress. Guided by the [Grievance Process](#), we review, address and monitor the outcome of grievances following a predictable and effective path of action. Our objective is to achieve long-term risk mitigation, so we engage and support our suppliers in addressing instances of noncompliance through time-bound action plans. We share updates on the grievances of every year in our [dashboard](#).

## Employee Training

Cargill Canada employees receive annual training on the Cargill Code of Conduct, which as described above, prohibits forced and child labour.

In addition, Cargill offers relevant employees robust training on the definitions of human rights issues and their root causes, and enhancing skills to identify, analyze and resolve human rights issues in our operations and supply chains. Additional human rights training for relevant employees covers Cargill's Human Rights Strategy Framework and policy, including an overview of forced and child labour and child protection.

In FY2024, Cargill Canada conducted a mandatory training session with representatives from both our Canadian businesses teams specific to the requirements of the Canada Modern Slavery Act. During the training, participants were educated on the reporting obligations under the Act. The training was developed internally by our legal team.

## Assessing the Effectiveness of our Measures

Cargill Canada works with customers, suppliers and service providers to learn about and resolve complaints and conflicts in its own operations and supply chains through an open, accessible, transparent and consultative process. Cargill Canada is committed to taking measures to remediate any instances of forced or child labour that are identified and to remediate any loss of income to the most vulnerable families that results from any such measures taken. Cargill Canada did not identify risks in FY2024 requiring remedial action that would impact loss of income to the most vulnerable families or people.

We continue to increase awareness of the opportunities for workers and other stakeholders in our supply chains, including community members, to bring concerns to the attention of Cargill. Individuals can anonymously report on the conduct of a Cargill employee or business through the Cargill's Ethics Open Line which is available 24 hours a day, seven days a week for employees and third parties anywhere in the world (subject to certain countries' legal limitations). This channel is managed by a third-party to secure confidentiality and protection from retaliation. In FY2024, Cargill Canada did not receive any Ethics Open Line complaints alleging risks or violations of forced or child labor relevant to Cargill Canada.

Cargill also enforces an Anti-Retaliation Policy which applies to all employees, agents, contractors, and others acting on behalf of Cargill. This policy encourages employees to report unlawful or unethical behaviors and requires protection of those employees from retaliation after they report in good faith.

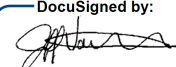
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## Attestations

The attestations below confirm the approval of this report by the respective governing bodies of each entity covered by the report, pursuant to subparagraph 11(4)(b)(i).

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for **Cargill Limited – Cargill Limitée**. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.”

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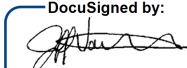
08 May 2025

M. Jeffrey Vassart, President

Date

“I have the authority to bind Cargill Limited – Cargill Limitée.”

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for **EWOS Canada Ltd.** Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.”

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08 May 2025

M. Jeffrey Vassart, President

Date

“I have the authority to bind EWOS Canada Ltd.”

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for **Precision Agricultural Services Inc.** Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.”

Signed by:  
  
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09 May 2025

Glenn Houser, Board Chair

Date

“I have the authority to bind Precision Agricultural Services Inc.”



## **Appendix A**

### **Cargill Canada Structure, Operations and Supply Chains**

#### **1. Cargill Agricultural Supply Chain (“CASC”)**

##### ***Grain Processing, Exports, and Crop Inputs***

###### **Main Operations**

- Transporting/moving goods/rail and truck
- Commodity Trading; sales and marketing
- Distribution of meals and oils
- Process oil seeds to produce crude oil, refined oil, and oilseed crush by products
- Wholesale distribution of seed and agriculture crop protection products
- Retail distribution of seed, agriculture crop protection and fertilizer products

###### **Supply Chain**

- Grain and oilseed products purchased from growers, traders
- Crop Protection, Seed, and Fertilizer supplied from manufacturers
- Transportation services of products to warehouse and to customers
- Third party warehouse storage
- 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, 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.

#### **2. Cargill Protein and Salt (“Protein”)**

##### ***Protein: Beef and Chicken Processing, Hatchery, Case Ready, and Beef Patties***

##### ***Salt: Road Safety***

###### **Main Operations**

- Primary Beef Harvest Facilities, harvesting live cattle, beef carcass deboning, trimming, cutting and grinding to produce boxed beef, beef trimmings, ground beef, beef by-products and offals.
- Beef product distribution
- Beef by-product rendering
- Harvesting live chicken, chicken carcass deboning, trimming and cutting to produce chicken pieces, chicken by-products and offals.
- Chicken meat marinating, grinding, forming, coating, frying and freezing to produce par-cooked chicken products
- Chicken product distribution
- Egg incubation, chick hatching, sorting, vaccination and preparation for distribution to independent, contract chicken farmers
- Portioning and tray-packing fresh meat products for grocery retail sale
- Meat product distribution

- Beef grinding, forming and freezing to produce frozen beef patties for retail and foodservice
- Beef product distribution
- Transporting/moving goods/vessel and truck
- Commodity trading; sales and marketing
- Distribution and supply of Bulk de-icing Road Salt

#### Supply Chain

- Live beef cattle
- Plant consumables
- Live chicken
- Coating ingredients, marinades and spices
- Broiler chicken eggs (from chicken breeder farms)
- Boxed meat
- Marinades and spices
- Fresh and frozen beef trimmings
- Bulk Road salt products
- Service providers, contractors and sub-contractors including road transport providers; storage services; stevedoring and port terminal services; Customs broker and shipping agents.

### **3. Cargill Animal Nutrition & Health (“ANH”)**

#### ***Cargill Animal Nutrition, Cargill Premix, Aqua Nutrition (EWOS)***

#### Main Operations

- Manufacture and distribution of feed products for beef, dairy, swine, poultry, pet food and other agricultural animals
- Manufacture and distribution of micro ingredient premixes for animal feed products
- Manufacture and distribution of aquafeed products

### **4. Cargill Food & Bioindustrial (“CFB”)**

#### ***Cocoa & Chocolate, Go to Market, and Specialty Canola***

#### Main Operations

- Manufacture of finished packaged and bulk chocolate for further processing
- Marketing of high oleic canola oil
- Sale of food ingredient to Canadian manufacturers