

BUNGE LIMITED
EXECUTIVE COMPENSATION RECOUPMENT POLICY

If the Board of Directors of Bunge Limited (“Bunge”) or an appropriate committee thereof determines that any current or former (A) member of Bunge’s Executive Committee or (B) officer who is, or was, subject to Section 16(b) of the Securities Exchange Act of 1934, as amended (each, an “Executive”), has engaged in any fraud or misconduct that caused or was a significant contributing factor to Bunge having to restate all or a portion of its financial statement(s), the Board shall take such actions as it deems appropriate to remedy the misconduct and prevent its recurrence. In determining what remedies to pursue, the Board will take into account all relevant factors, including, without limitation, the circumstances and nature of the conduct that resulted in the restatement.

The Board or an appropriate committee thereof may, as it deems appropriate and to the extent permitted by applicable law, (i) require reimbursement of any bonus or incentive compensation, (ii) cause the cancellation of any outstanding stock options, restricted stock units or other equity-based awards granted by Bunge to the Executive, and (iii) seek reimbursement of any gains realized on the disposition or transfer of any stock options, restricted stock units or other equity-based awards, if and to the extent that, (a) the amount of compensation awarded to or received by the Executive was calculated based upon the achievement of certain financial results that were subsequently reduced due to a restatement, (b) the Executive engaged in fraud or misconduct that caused or significantly contributed to the restatement, and (c) the amount of the compensation that would have been awarded to or received by the Executive had the financial results been properly reported would have been lower than the amount actually awarded or received.

Any recoupment under this Policy is in addition to, and not in lieu of, any other remedies or rights of recoupment that may be available to Bunge under applicable law, including, without limitation, (i) dismissing the Executive, (ii) adjusting the future compensation of the Executive or (iii) authorizing legal action or taking such other action to enforce the Executive’s obligations to Bunge as it may deem appropriate in view of all of the facts and circumstances surrounding the particular case.