

ACC InConversation: Rishi Varma of Cargill

Interviews and Profiles



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Rishi Varma, corporate senior vice president, chief legal and compliance officer, and corporate secretary at Cargill, the multinational food corporation and the largest privately held company in the United States in terms of revenue. He joined ACC President and CEO Veta T. Richardson for a

conversation about his career journey during the latest ACC InConversation webcast.

Watch the full interview!

While attending Georgetown University as an undergraduate, Varma majored in political science and minored in social and political thoughts. “I was not going to follow in my parents’ footsteps and be the good Indian son and go to medical school,” he quickly realized.

His curiosity and interest in law eventually led him to Georgetown Law School where he earned his JD in 1997.

Law firm to corporate transition

Varma expressed feeling like his transition from law firm to in-house was similar to others, but what Varma genuinely learned during this time were key elements about legal critical thinking, issue spotting, legal analysis, and the basic structure of a law firm.

Law firms measure productivity based on available hours, whereas in-house lawyers are measured by the completeness of their ability to provide counsel. Efficiency in delivering messages, providing solid guidance, and being held accountable for what comes next form a trifecta for becoming a great in-house attorney.

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When asked if he believes there are disadvantages to going straight in-house after law school and if law firm experience is critical to being successful as an in-house attorney, Varma answered, “Legal experience is critical. You have to think about the size and scale of where you’re going so you can make sure you have the breadth of education.”

Practicing as a new in-house lawyer, Varma then discovered a deeper connection to the business and legal department and started exploring his newfound passion and purpose — delivering wins and making an impact for the company.

Adhering to new communication styles

“Your communication is dependent on your audience,” says Varma. He disclosed several tips he finds useful when communicating with colleagues.

- “Never sell past the close.” Tailor what you’re going to say to your audience.
- Understand your audience.
- “Have good leaders in your department that impress upon you what your different communication style needs to be.”
- Brevity — “You need to be able to hit the highlights.”

Navigating through new beginnings

Prior to his role at Cargill, Varma was the general counsel at Hewlett Packard Enterprise — a different company in a very different industry. When asked how he learned a new industry, his first piece of advice was to absorb all of the information in front of you.

“To be a really good in-house counsel, you cannot be agnostic to industry,” Varma says. He is continuously learning and understanding the business, to then understand the risks and provide helpful solutions.

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Varma also warned of the importance of establishing yourself early in your new role. “You can never make a first impression again,” he said. In his 30-60-90-day approach, Varma wanted to make sure people saw him and were receptive to seeing him and his suggestions in the first 30 days at Cargill. Stating how important it was to have an open-door policy and ensuring colleagues were comfortable enough to express their concerns, observations, or challenges to him.

As a GC, he suggests getting to know your colleagues and direct reports and figuring out what communications style works best for both of you. Varma wanted to make certain he understood what normal was and what best practices looked like before agreeing with it.

Managing a team

Operating with approximately 585 employees worldwide, Cargill’s legal department has adopted a decentralized structure, but Varma is working to build more connections throughout the enterprise. Labor and employment, intellectual property, M&A, corporate governance, and litigation are all areas he manages, and some others who are not in the legal profession — such as global security and government relations — report in to him, as well.

This is not uncommon. ACC’s 2024 Chief Legal Officers Survey found that 58 percent of CLOs oversee three or more business functions beyond legal, and 27 percent oversee five or more.

Download ACC’s 2024 Chief Legal Officers Survey

A day in the life at Cargill

> “We start early.”

It is not unusual for Varma to hold and conduct meetings around 6 or 6:30 in the morning. Some days, the executive team will discuss and digest any ongoing and upcoming challenges or issues from 6 to 9 am and then start their workday.

A typical day for Varma includes a day full of discussions and meetings about the week ahead, regulatory issues, geopolitical issues, and more. He conducts one-on-one meetings with direct reports and key leaders to monitor progress on certain tasks. Later in the week, Varma considers proposed solutions to those issues and ways to prepare for the week ahead.

The evolution of today’s legal department and technology

How can I make what I do faster? And how can I provide solutions faster? Those are two questions Varma thinks every company should keep in mind when using AI to assist with their productivity.

Varma broke down in his perspective on four major in-house practice phases of evolution in his lifetime:

1. In the late 1980s, when GE decided there should be a real in-house legal department.
2. Growing offshore resources in the early 2000s, and how they can be more cost effective.
3. The business of running a legal department became relevant in the early 2010s, including e-billing, eDiscovery, and legal operations.
4. Today’s large language models.

To him, the ultimate solution that AI can offer is the problem of institutional knowledge. “We need to better understand how we can both modernize the department but also modernize how we have our upskilled people who can deliver solutions through the department,” Varma said.

Varma also took questions from the audience, including: Do you have any suggestions on how you convince leadership to take on proactive legal risk management and quantify the value of that as opposed to reactive legal risk management? The first thing that comes to mind for him was: “How do we proactively manage this?”

“Find use cases and share examples that help quantify what proactive risk management looks like. To prevent bigger problems from happening down the road, utilize use cases and examples that help identify why proactive risk management has been helpful for you, your company, another company, or another person in the same industry,” Varma added. This way, he believes proactive legal risk management can be showcased as a competitive advantage and that you can win the right way.

DEI initiatives

> “Not a lot of GCs or CLOs look like me.”

Diversity, equity, and inclusion (DEI) is something Varma is passionate about. It holds importance to Varma, and it is valuable to Cargill.

Traditional career paths are not always readily available to people of diverse backgrounds, and that is why it is so important to him that the progression of DEI needs to have a broader portfolio, to be able to choose from the best and brightest applicants. “But it’s not just the pipeline that needs repair, it’s the leadership,” Varma says, mentioning that leaders need to pay particular attention to career progression and be in tune with their own implicit biases.

“As a legal profession, we need to be making bigger changes, structural changes, and we need to start seeing a lot more people that look like me. A lot more women in GC roles, CLO roles, a lot more people of color, and we’re just not there yet,” he said.

Having a seat at the table

“The great work of my department, and the value they deliver to the business, actually makes me more credible in those rooms,” Varma says, noting he’s a respected member of the C-suite.

The legal department sees many challenges, gaps in execution, and opportunities that commercial teams may not see due to other responsibilities or fields they’re in. The real value-add is connecting those dots, communicating with each other, sharing best practices between enterprises, and finding creative ways to ensure differentiations can deliver solutions for our customers. Being able to see end to end is extremely helpful for effective CLOs wanting to make an impact at the table.

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A direct reporting line to the CEO is just the beginning.

Fostering a sense of well-being and culture at Cargill

At Cargill, employees operate on a hybrid schedule and certain roles are fully remote. But Varma believes that “bringing people together is helpful.” Just recently, Cargill’s legal department implemented a Global Day of Service where employees committed to different community service activities together including pro bono and legal services. Sharing photos, stories, and connecting with people all over the world from Singapore, Brazil, Europe, Canada, and the United States. This event was energetic and just an example of the kinds of things that foster a great work culture and sense of well-being for his company.

Varma takes pride in making his employees feel empowered to do the things that matter to them

while providing active support and recognition, so they know that what they're doing matters.

Five checklists to support your well-being and leadership.

A piece of advice for aspiring lawyers

Varma's advice for aspiring GCs is to hone the leadership skills they already possess in the role they are in now, and invest in opportunities as they arise.

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