



June 28, 2024

Statement on the California Transparency in Supply Chains Act, UK Modern Slavery Act, and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act

I. About ADM

ADM unlocks the power of nature to enrich the quality of life. We're an essential global agricultural supply chain manager and processor, providing food security by connecting local needs with global capabilities. We're a premier human and animal nutrition provider, offering one of the industry's broadest portfolios of ingredients and solutions from nature. We're a trailblazer in health and well-being, with an industry-leading range of products for consumers looking for new ways to live healthier lives. We're a cutting-edge innovator, guiding the way to a future of new consumer and industrial solutions. And we're a leader in sustainability, scaling across entire value chains to help decarbonize the multiple industries we serve. Around the globe, our innovation and expertise are meeting critical needs while nourishing quality of life and supporting a healthier planet. Learn more at www.adm.com.

A critical component of our efforts to enrich lives around the world is our commitment to creating positive impacts for the people throughout our value chain and the communities in which we live and work. As part of this commitment, we are proud to disclose our efforts to eradicate slavery and human trafficking in product supply chains, in compliance with the California Transparency in Supply Chains Act of 2010, the UK Modern Slavery Act of 2015, and the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Acts").

ADM strongly supports human rights, and we expect our business partners to treat their employees with dignity and respect. We will never knowingly use suppliers who employ or exploit legally underage workers or forced labor and will not condone such practices. In order to enforce these rigorous standards, we have implemented the following programs and policies related to our human rights commitments.

II. ADM's Corporate Programs and Policies Related to Human Rights in our Supply Chains and Operations

A. Governance

Our sustainability efforts are overseen by our Board of Directors, including a dedicated Sustainability and Corporate Responsibility Committee, and led by our Chief Sustainability Officer (CSO), who is supported by regional sustainability teams.



B. Human Rights Policy

In 2021, we updated our Human Rights Policy to improve clarity and align with the United Nations Guiding Principles (UNGP) framework. The ADM Human Rights Policy is approved by our Chief Executive Officer. The Policy promotes the practice of Human Rights Due Diligence and emphasizes the prevention of:

- *Forced, Bonded, or Compulsory Labor* - employees should not be charged fees in exchange for employment or have collateral held, in the form of money, identification or other personal belongings, without workers' consent as a condition of employment.
- *Child Labor* - defined as (1) work that is hazardous to children's health, safety or morals, (2) work that interferes with compulsory education, or (3) work for which they are simply too young. All workers in our operations and our supply chain must meet the minimum age to work as defined by ILO Convention 138 as well as applicable local laws and regulations.
- *Harassment and Discrimination* - we prohibit discrimination in our operations and supply chain on the basis of race, color, religion, sex, gender identity, national origin, immigration status, disability, age, sexual orientation, marital status or any other status protected by local law. We prohibit harassment and abuse. These prohibitions extend to migrant workers.

Please refer to our [Implementation Progress Report 2023](#) for an overview of our goals, plans, KPIs, and activities and actions to respect human rights in 2023.

C. ADM's Expectations for Its Suppliers

We set forth [Supplier Expectations](#) that include specific sustainability and Human Rights provisions addressing wages, prohibitions on slavery and child labor, health and safety, working hours, freedom of association, discrimination, grievances, environmental impact, land rights, and sourcing and materials. We expect each of our suppliers to comply with these expectations. Please see our Supplier Expectations document [here](#).

Our policies have been translated into key languages to ensure broad understanding across global supply chains. Our Human Rights Policy is embedded into contracts on a regional and business unit basis as part of ADM's global supply chain program. For additional information view [ADM's Code of Conduct](#) and ADM's [Human Rights Policy](#).

We include Human Rights related questions in certain supplier pre-screening questionnaires to proactively screen suppliers prior to entering business relationships in high-risk geographies and supply chains. ADM has leveraged third-party verifiers, such as Sedex and EcoVadis, to review that our supply chains uphold human rights and are free from violations. The chart below sets forth our progress on relevant supply chain due diligence initiatives.



Program Component	Status	Progress
Supply Chain Due Diligence Standard Operating Procedure and Training	Completed	Our Standard Operating Procedure specifies detailed requirements for conducting sustainability-based risk assessments with corresponding risk mitigation measures. All procurement staff have been trained on the procedure.
Sustainability Contract Clauses	In Progress	Efforts continue to embed human rights contract clauses in all types of supplier relationships.
Supplier Expectations Document	Completed	The Supplier Expectations Document has been embedded into Terms and Conditions, certain contract clauses, and in agreements for our suppliers depending on relationship and region.
Supply Chain Mapping	In Progress	Nearly 100% of ADM's Global Human Nutrition supply chain has been mapped to country of origin. Animal Nutrition and non-commodity procurement for AS&O and Carb Sol are in progress. Traceability of our Palm and Soy supply chains can be found in our Sustainability Goals and Key Performance Indicators .
Risk Analysis	Annual, and during supplier onboarding	An ongoing risk analysis is underway for human rights issues. We leverage the EiQ platform to facilitate risk analyses.
Risk Mitigation	Ongoing	Supplier engagement with strategic suppliers is conducted in accordance with Standard Operating Procedures. Mitigation includes the inclusion of contract clauses, completion of Self-Assessment Questionnaires, and auditing for compliance.

III. Potential Risks in ADM's Supply Chain


A. Soy

- Policy to Protect Forests, Biodiversity and Communities: We commit to build traceable and transparent agricultural supply chains that protect forests, biodiversity and communities worldwide. This Policy covers the overarching commitments applicable to all supply chains, as well as the more specific commitments to address the complexity of palm oil and soy supply chains. Our Commitment to Protect Forests, Biodiversity and Communities includes no exploitation of people and local communities in accordance with our Human Rights Policy, emphasizing the respect of Indigenous Rights and Labor Rights.
- Responsible Soy: Commitment to no exploitation of people or local communities as part of our effort to help develop a more sustainable supply chain for South American soy. We will not conduct business with suppliers who violate our soy supply chain policies repeatedly and refuse to take action to comply.
- As a member of the Soft Commodities Forum (SCF), we committed and achieved full traceability to farm for direct suppliers in the priority municipalities that account for almost 70% of all conversion

within the Cerrado biome.

- As a signatory to the National Agreement to Eradicate Slave Labor in Brazil, we commit to refrain from negotiating with companies included in the “Lista Suja,” or “dirty list,” maintained by the Brazilian Ministry of Labor.
- The ADM Responsible Soy Standard allows participating growers in Brazil to undergo periodic audits that assess their adherence to a broad set of standards, including labor practices and legal compliance.
- We’re also a member of the Round Table on Responsible Soy (RTRS), an international organization whose certification system assures that soybeans originate from a process that includes responsible labor conditions.
- We are a member of the World Business Council for Sustainable Development (WBCSD) who share the same goals regarding No Deforestation and No Exploitation in their supply chains.
- Through a joint effort with Aliança da Terra, a not-for-profit sustainable farming group founded by farmers, we’ve created the Doing it Right (Produzindo Certo) program to educate Brazilian farmers and emphasize fair labor conditions.
- Since 2018, specialized firms with GIS technology (satellite imaging) have been cross-referencing planted areas within the farm polygons of our direct suppliers in high-risk areas to determine if the soy being sourced is compliant with our Policy. Farms are also verified to make sure there are no environmental issues (embargoed areas), encroachment into protected areas or Indigenous Territories, or labor issues which violate our No Exploitation Policy.
- Pará Coalition Territorial Project: Led by [Childhood Brasil](#), this is an innovative initiative for preventing and combating the sexual exploitation of children and adolescents. The Pará Coalition promotes local, integrated and systemic action in a region where the sexual exploitation of children and adolescents is a pre-existing problem. This is due to risk factors related to multimodal road, river and sea cargo transport operations. This program focuses on three municipalities in Pará State: Itaituba and Barcarena, where the operations of the five participating companies are located - ADM, Cargill, Norsk Hydro, Vibra and Viterro - and Breves, which is considered the most critical municipality on the river route.
- InPacto: We are associated with [InPacto](#), designating our commitment to eradicating slave and child labor and promoting decent work in the production chains operating in Brazil.
- In 2023, we continued to map our South American soybean supply chain and implement action plans that incorporate elements of our Human Rights Policy. In particular, supplier contracts in Brazil have been updated to include a clause prohibiting exploitation and human rights violations; furthermore, we are sending training documents to our suppliers which outline our Human Rights Policy and the No Exploitation portion of our Commitment to No-Deforestation.
- Please refer to our Sustainability Progress Tracker and [2023 Soy Progress Report](#) for more information on our progress on Sustainable Soy initiatives.

B. Palm

- Responsible Palm Oil: Commitment to no exploitation of people or local communities as part of our effort to help develop a more sustainable supply chain for palm oil, palm kernel oil and palm derivatives. Business will not be conducted with suppliers who violate our palm oil supply chain policies and refuse to take action to comply.
 - We are a member of the Roundtable on Sustainable Palm Oil (RSPO). RSPO is an international
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organization that develops global certification standards for sustainable palm oil based upon an exacting set of criteria, including the fair treatment of workers. Efforts continue to increase the total amount of RSPO-certified products we offer.

- We engaged with 100% of our direct PKE suppliers in Indonesia and Malaysia. The engagement process includes discussions on sustainability topics including:
 - ADM's responsible palm policies and commitments.
 - Increasing traceability scores.
 - Assessing tier one suppliers using the palm scorecard.
- Alongside with the high targets set for sustainability, we decided to broaden the scope of our Palm reporting and include all palm sources across our different businesses. Therefore, the baseline of suppliers and volumes has been increased compared to the previous palm progress reports.
 - 96.5% of volumes reported through the NDPE IRF.
 - 98% of volumes are sourced from suppliers implementing plan with verifiable timebound targets and milestones.
 - 97.5% of volumes are sourced from suppliers conducting engagement and awareness-raising programs.
 - 96.5% of volumes are sourced from suppliers undertaking environmental risk assessment of mills.
 - 97.5% of volumes are sourced from suppliers that support landscape and local programs in high-risk production landscape.
 - 91.2% of volumes are sourced from suppliers implementing Human Rights Policy.
 - 97.5% of volumes sourced originates from suppliers with a Grievance Management Procedure in place.
 - 100% of direct suppliers are committed to ADM's Human Rights policy and policy to protect Forests, Biodiversity, and Communities.
 - 100% of direct suppliers are included in the scorecard for assessing NDPE and Human Rights.
 - 100% of mills sourced by ADM are satellite-monitored against deforestation, representing 15 million hectares.
- We continue to participate as an active member in the NDPE IRF Active Working Group to drive progress on reporting against NDPE criteria. We also recognize ISPO/MSPO as a regulatory framework and as an entry point to the NDPE IRF framework.
- Transformation project examples:
 - Project: [Mariposa Project](#), WISSE, Colombia
 - Organizations: Olenex/Wilmar & NES Naturaleza.
 - Focus areas: Smallholder training on NDPE, including workers' rights and community rights.
 - Achievements/Targets: 306 smallholders certified and more than 1,520 smallholders trained.
 - Project: Child Risk Assessment Framework (CRAF), Malaysia
 - Organization: Earthworm Foundation.
 - Focus area: Child Rights, Child Labour.
 - Impact: 6 toolkits covering key child rights issues.
 - Project: Social Issues Working Group NDPE IRF



- Organization: Working group with 38 companies.
 - Focus areas: Deforestation, Human Rights, Traceability.
- Please refer to our Sustainability Progress Tracker and [2023 Palm Oil Progress Reports](#) for more information on our progress on Sustainable Palm initiatives.

C. Vanilla

- In 2018, ADM acquired Rodelle Inc., a premium originator, processor and supplier of vanilla products with supply chains in Madagascar and Uganda. In 2019, we conducted supply risk analysis of those supply chains and have been working since to develop a unique supplier sourcing protocol to ensure human rights are being protected in this high-risk supply chain.
- Our responsible sourcing code for vanilla establishes stringent requirements covering agronomy, social responsibility, environmental impact, compliance, and human rights in vanilla sourcing.
- Additionally, we are a board member of the Sustainable Vanilla Initiative, which aims to promote industry-wide, long-term stable supply of high-quality, natural vanilla, which is produced in a socially, environmentally and economically sustainable way.
- We also leverage ADM Cares to provide additional support on an ad hoc basis when needs are critical. For example, during COVID, ADM Cares supplied over 6,000 COVID testing kits to vanilla partners in Madagascar. In 2022, as a response to Cyclone Batsirai, ADM Cares provided \$20K for the local purchase of necessities to distribute to vanilla farmers. Since ADM acquired Rodelle in 2018, ADM Cares in collaboration with Rodelle and ADM Rice has donated over 390 MT of rice to vanilla farmers in Madagascar to alleviate malnutrition.

IV. **ADM's Remediation of Human Rights Issues**

A. Training

ADM Colleagues receive regular trainings, reinforcing the duty to know and abide by our Company's core values, policies, procedures and guidelines. In addition, all new hires receive Code of Conduct training at the beginning of their employment. In 2021, 99% of colleagues completed Human Rights Training. In 2023, all procurement staff were trained on Supply Chain Due Diligence. We plan to include further Human Rights training for all colleagues in the coming year.

B. Supplier Risk Assessment

We engaged a third-party to conduct a supplier risk assessment of human rights compliance in our supply chain. The analysis mapped the supply chain for key commodities based on inherent sourcing risks and business leverage insights to determine which segments have the highest risk profiles and which provide the greatest opportunity for ADM to influence positive change. The assessment consisted of three phases:

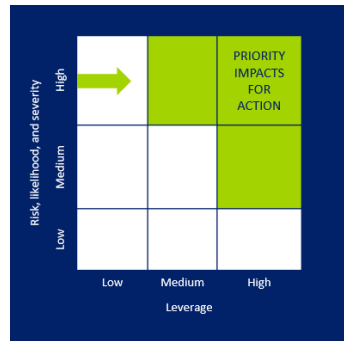
- **Phase 1: Macro (country and commodity) level risks.**
 - This phase was designed to identify high-risk and high-leverage suppliers to assess in phase two. From a pool of over 300,000 suppliers, 15 commodities (based on procurement spend and stakeholder concern) sourced from more



than 100 countries were assessed at a macro level.

- **Phase 2: Micro (site/farm) level risks.**
 - Using the results from phase one, eight commodities (corn, soy, wheat, palm, apples, macadamias, peanuts and pecans) in 20 countries from 1,132 suppliers were assessed.
- **Phase 3: Macro and micro analysis of specialty commodities.**
 - Using the results from phase 1 and 2, this phase included an analysis and interpretation of our risk analysis to inform decision making.

Additionally, we utilize the EiQ tool to conduct human rights risk assessments based on sourcing country and commodity. The tool provides an array of indices from a combination of international, academic, and civil society data. Our indices are weighted in a customized way for our most salient human rights concerns. We then use the results of the tool to prioritize areas for impact.



From these preliminary results, we began crafting a due diligence program that ensures effective risk assessment and mitigation strategies.

C. SEDEX Membership and Social Compliance Audits

We work closely with Sedex to connect to our direct suppliers via the SEDEX platform. SEDEX (Supplier Ethical Data Exchange) is a not-for-profit organization dedicated to driving improvements in responsible and ethical business practices, including labor standards, in global supply chains. Risk mitigation includes many components, such as social compliance audits and self-assessment questionnaires (SAQ) using a standardized methodology allows for active monitoring of our suppliers' efforts. Linking to suppliers through SEDEX provides better visibility into our supply chain and insight into potential risks as well as our suppliers' corrective action plans. While we are actively looking to use SEDEX as our standard method for assessment, we are also looking into comparable social compliance audits to allow flexibility for our suppliers to demonstrate compliance.

Certain ADM facilities register with SEDEX, maintain a self-assessment questionnaire, and periodically host and complete third-party SEDEX audits. The human rights portion of these audits includes assessments of facility conditions, child labor, forced/bonded labor, eligibility for employment, ethical recruitment, safety, discrimination, harassment and abuse, compensation, freedom of association and

collective bargaining, and indigenous populations and communities. In addition to tracking all audit outcomes and corrective actions, we report on specific KPIs, in accordance with our Human Rights program. At the ADM facilities visited in 2023, there were no fees charged to jobseekers in exchange for employment and no collateral was taken in the form of money, identification or other personal belongings (without workers' consent) as a condition of employment by ADM or contracted companies. Additionally, no human trafficking was observed.

D. ADM Way Helpline

We host a 24-hour phone line, an email address, and a mailing address where violations of applicable laws, regulations, and our policies can be reported (anonymously where permitted by applicable law), promptly and thoroughly investigated, and handled as appropriate. Anyone who violates applicable laws, regulations, or our policies will be subject to disciplinary action, up to and including termination.

E. Public-Facing Grievance Mechanism

We have a protocol that outlines our workflow and response mechanism for addressing concerns and inquiries pertaining to deforestation or human rights violations in our supply chain. The grievance mechanism is available to any party – internal or external – who wants to voice a concern by emailing responsibility@adm.com or through our [ADMWay Helpline](#).

Allegations of violations of our Policy to Protect Forests, Biodiversity and Communities or Human Rights Policy will be investigated according to the protocol, and results will be added to the Grievances and Resolutions Log on our [website](#).

In 2023, allegations of human rights violations in our supply chains were investigated and addressed in accordance with our protocol, and the outcomes were published in our log. The allegations came from four entities:

- US Customs and Border Control – allegations of human rights violations in the supply chain indirectly via third party suppliers and directly with a parent company.
- Reuters, Global Witness, and Christliche Initiative Romero E.V. Letters – multiple reports of human rights violations in the supply chain indirectly via third party suppliers, including indigenous rights and land tenure disputes.

F. Other Engagement

We actively engage with our smallholder farmers in capacity building efforts throughout our value chain. This programming can include access to training, equitable business opportunities, community livelihood enhancement, and other techniques to ensure our grower communities are supported. To date, we have not identified that any of our sustainability actions have resulted in loss of income to vulnerable families.

For more information on our broader sustainability efforts, please visit our [sustainability website](#).



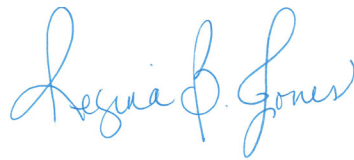
G. Remediation

ADM engages with its stakeholders on an ongoing basis to monitor for forced or child labour risk factors and to appropriately remediate any issues or material risks that are identified. Remediation is undertaken in a manner that is sensitive to the risk of adverse income consequences to vulnerable families that can result from broader remediation measures.

V. Attestation

This report constitutes ADM's disclosures pursuant to the Acts for the financial year ending December 31, 2023.

In accordance with the requirements of the Acts, I attest that I have reviewed the information contained in the report for ADM. 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 these Acts, for the reporting year listed above.



Regina Bynote Jones
Senior Vice President, General Counsel and Secretary
May 31, 2024

