

# Integrity. It's in our Nature.



## Code of Conduct



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# **Integrity. It's in our Nature.**

**A Message from our Chairman and CEO, Juan R. Luciano**

**Our Purpose, Values and Our Leadership Behaviors**

**About Our Code**

**Our Responsibilities**

**Making Good Choices**

**Speaking Up**



**Integrity.  
It's in our  
Nature.**

## A Message from Our Chairman and CEO, Juan R. Luciano

As a premier global nutrition company, supply chain manager and agricultural processor, ADM provides access to sustainable human and animal nutrition worldwide. We unlock the power of nature to provide groundbreaking solutions that support healthier living. We are an innovator in replacing petroleum-based products and leader in sustainability.

ADM's purpose is to **"Unlock the power of nature, to enrich the quality of life."** With this vital purpose comes responsibility: we must ensure that we fulfill ADM's deeply held commitments and uphold the highest standards of integrity and ethical business conduct. Our Code – *Integrity. It's in Our Nature.* – is set forth in the following pages and is designed to guide us in our work activities wherever located. It shows how to conduct business in an ethical and legal manner and consistent with our Company's values and culture of integrity.

The Code also directs us where to go when we have questions or concerns or wish to make a report. We are all expected to report violations of our Code. To do so, you can contact any of the resources listed in the "Speaking Up" and "Helpful Resources" sections. And remember, ADM will not tolerate retaliation against you for reporting misconduct or concerns. It is important that each of us knows and follows not only the letter, but also the spirit of our Code of Conduct. By living our values and upholding our Code, you will help ensure we continue to achieve the right results, the right way.

**Juan R. Luciano**  
Chairman and CEO

# Our Purpose and Values

## Our Purpose

To unlock the power of nature, to enrich the quality of life.



## Our Values

Our core values express what we expect of ourselves and each other. They are the foundation for everything we do at ADM.

### Have Integrity

Be honest and true.

### Be Resourceful

Make it work the right way.

### Show Respect

Treat everyone and everything with care and consideration.

### Practice Teamwork

Succeed together.

### Achieve Excellence

Be great at what you do and keep getting better.

### Take Responsibility

Own it. Do it. Don't give up.

# Our Leadership Behaviors

Whether we lead people or projects, we all have the ability to make a positive impact on our culture by setting an example and modeling these behaviors.



## We are owners

We effectively communicate and translate ADM's vision and strategy into clear day-to-day priorities. We anticipate market trends and shape our future through innovation. We are customer centric and build strong partnerships. We take responsibility and hold ourselves and others accountable for results.

## We continuously learn

We take personal accountability for our own development. We learn from successes and setbacks; these learnings make us stronger. We are enterprise leaders and perpetuate learnings for the greater good of the ADM enterprise.

## We help each other thrive

We are one ADM, and empower our colleagues through respect and teamwork. We have a strong sense of self-awareness and understand our impact on others. We provide ongoing coaching, feedback and recognition to unlock the potential of teams to meet both professional and personal goals. We are agile and effectively lead change through empathy, influence and communication. We celebrate our wins, both big and small.

## We create the environment for diversity, equity and inclusion to strengthen us

We instill trust and create an open, psychologically safe environment where people feel comfortable to be themselves. We listen intently and make room for different points of view to influence decisions; differences make us stronger. We have a global mindset.





# About Our Code

At ADM, we believe in making a positive impact and leading by example, setting a global standard for good business that other companies in our industry will follow. Our values and our Code of Conduct (“Code”) illustrate what doing business with integrity means to us, no matter where we are in the world.

While it may not cover every possible situation we will encounter, our Code, along with our Company policies provides guidance on:

- **Acting with integrity**
- **Complying with applicable laws, rules, and regulations that govern our business**
- **Where to go for additional information, advice, and guidance when we need it**
- **Speaking up if we see something that doesn't align with our values or this Code**

Our Code applies to all employees, officers, directors, contract workers and agents of ADM, our divisions, and affiliates in all countries (collectively referred to as “ADM” or the “Company” in this document). We expect our suppliers, business partners, and anyone who works on behalf of our Company to comply with the principles outlined in our Code and in our [Supplier Expectations](#).

Keep in mind that violations of the Code may also violate the law and can have serious consequences for our Company and the individuals involved. Violations of our Code or Company policies will lead to disciplinary action, up to and including termination of employment.

## Food For Thought



**Q**

What should I do if there is a conflict between what is in our Code and the laws or customs in the country where I work?

**A**

The best approach is to follow the stricter standard. If you aren't sure what to do, contact the Legal department or Compliance team for guidance.

# Our Responsibilities

**Building a culture of integrity requires a commitment from each one of us to:**

- Be honest and true and treat everyone and everything with care and consideration
- Read, understand and abide by the Code of Conduct
- Comply with the Code and any laws or Company policies that apply to our work
- Complete any required training so we fully understand what is expected of us
- Make it work the right way by seeking advice from a manager or the Compliance team if we have a question
- Take ownership by holding ourselves and each other accountable and speaking up if we see something that doesn't seem right
- Cooperate fully in the investigation of any possible violation of our Code, our policies, or the law

**Leaders have additional responsibilities to model our values and leadership behaviors for others and to:**

- Clearly communicate expectations for acting with integrity in everything we do
- Help others thrive by providing the training they need to do their jobs effectively and in compliance with Company policies, and by leading with respect and empathy
- Celebrate diversity and promote an inclusive workplace where all employees feel valued and can perform at their very best
- Create an environment of openness and trust that allows employees to feel safe and speak up and ask questions or raise concerns without fear of retaliation
- Promptly and appropriately address concerns raised to you and never take any form of retaliatory action, or allow retaliation, against anyone for raising a question or concern



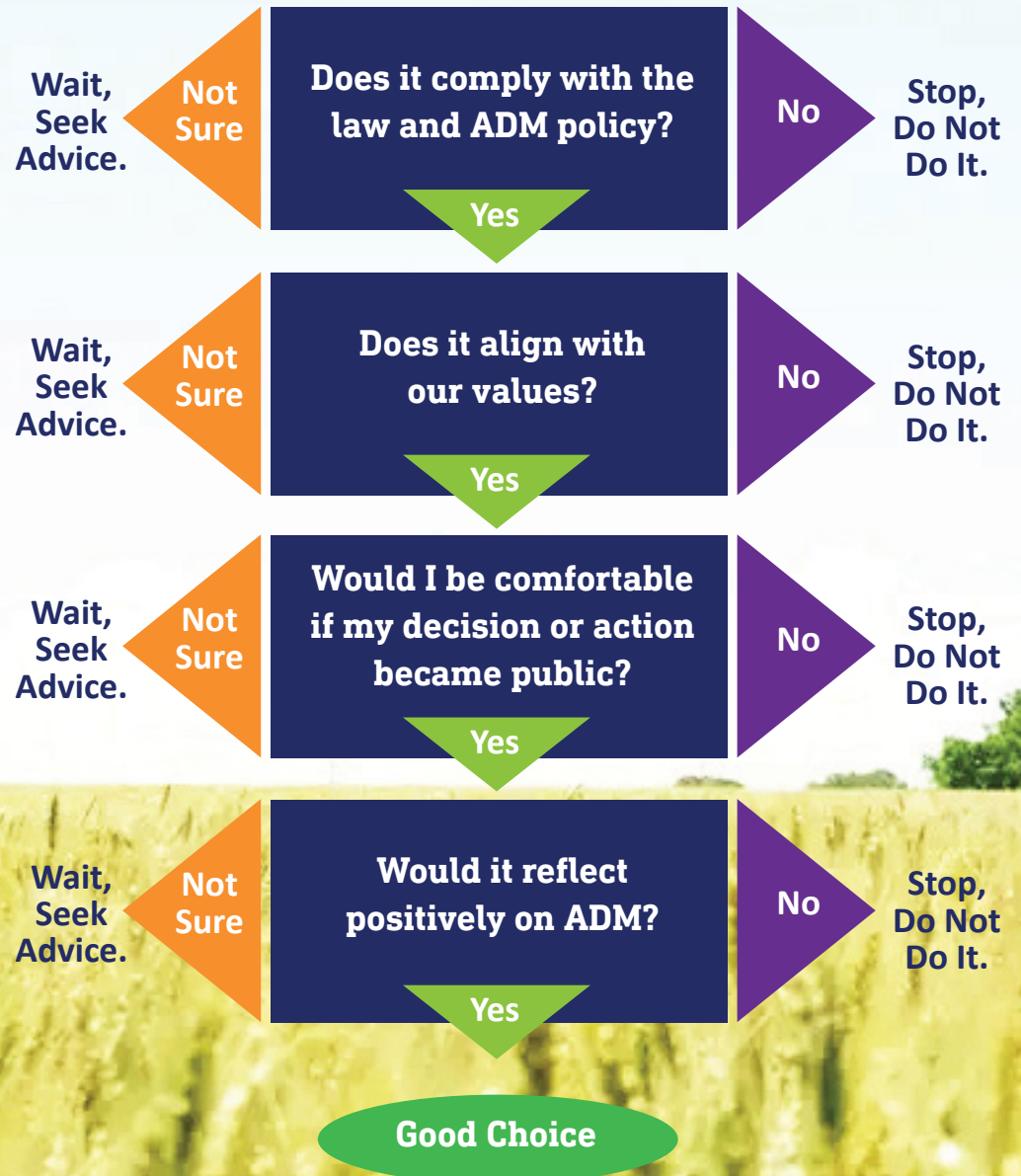


# Making Good Choices

Our purpose and our values guide our behavior, and they serve as the foundation for our decision making. The choices we make every day reflect who we are as an organization and as individuals. The right choice may not always be clear so it is important that we are comfortable asking questions and seeking advice when faced with a challenging decision.

If your answer to all of these questions is yes, it is likely a good choice to make. If your answer is no to any of these questions — stop, think, and seek advice from your manager or the Compliance team before taking any action.

When thinking about the right choice, consider these questions:





# Speaking Up

Speaking up about a possible violation of the Code, Company policies, or the law is the right thing to do and it is required. The sooner we know about a problem, the sooner we can address it, minimize any potential harm, and live up to our commitment to a culture of integrity.

We encourage you to speak up directly to your supervisor or manager, but you may also ask questions or raise concerns to:

- Any supervisor or manager
- Human Resources professionals
- The Compliance or Legal team
- The Global Security team
- The ADM Way Helpline

The [ADM Way Helpline](#) is a confidential and anonymous (where local law permits) means of asking a question or raising a concern in your local language 24 hours a day, seven days a week by internet or telephone.

**Note:** Contact information for the Compliance team and instructions for using the ADM Way Helpline can be found in the Helpful Resources section of this Code.





# Retaliation

## Food For Thought



**Q** I saw something at work that I am pretty sure violates our Code of Conduct, but I don't want to get involved because I don't want to be seen as a troublemaker. I know there are others who know about it, so I am sure someone else will report it. It's not my responsibility, right?

**A** Wrong. We are all responsible for speaking up if we believe something violates the law, our Code, or other Company policies. Others may not feel able to speak up for themselves. Even if you're not personally involved, failing to speak up or raise the issue to others who can take action means we are missing an opportunity to protect the Company and to protect each other.

We will never tolerate retaliation against anyone for speaking up in good faith. Making a report "in good faith" means your report is honest, sincere and complete to the best of your knowledge even if your report turns out to be unsubstantiated. If you believe that you or someone else has been retaliated against for raising a concern or participating in an investigation, you should contact the Compliance or Legal team or raise your concern using the [ADM Way Helpline](#).

**Q** I recently raised a concern about something I saw happening at work that I felt might violate the Code. Since then I feel like I am being treated differently. I used to go to lunch regularly with co-workers but now no one seems to want to go with me. I know the Company prohibits retaliation against anyone for raising a concern, but I am not sure if what I am experiencing could be retaliation. What is considered retaliation?

**A** *Retaliation* can be any adverse conduct taken against a person who raises a concern or participates in a Company investigation of misconduct. It can include shunning or harassing the person, making threats intended to intimidate them, or taking an employment action against them because of their report or participation in an investigation. If you feel you are being retaliated against, you should discuss your concerns with your manager, a Human Resources professional, or the Compliance team.

For more examples and guidance

[CLICK HERE](#)



# Making a Positive Impact on our People

We Are Safe

We Are Inclusive

We Show Respect

We Protect What's Personal



## We Are Safe

## Health, Safety, and Security

Our commitment to health and wellness is reflected in our shared commitment to maintain a safe, secure, and healthy workplace.

To make a positive impact we must:

- Know and follow health, safety, and environmental laws, regulations, and Company policies and procedures
- Never conduct business on ADM's behalf, or ask others to do so, if it cannot be done safely
- Strive to achieve zero injuries and safety incidents
- Do not work while under the influence of alcohol, cannabis, illegal drugs, or misused over-the-counter or prescription drugs
- Maintain an environment free of bullying, violence, threats of violence, and weapons
- Share ideas and work together to develop safe work practices
- Speak up if we see potentially unsafe conditions or behaviors that could pose a risk to the health, safety, or security of our colleagues or our workplace



Responsible alcohol consumption may be permissible at certain Company-sponsored events or when entertaining customers, such as at a business dinner. In these instances, only legal, moderate consumption is acceptable, and we must take appropriate measures to ensure that we, and others in our group, get home safely.



## Resources

- [Environmental, Health, and Safety Policy](#)
- [Life Critical Standards Policy](#)
- [Workplace Threats and Violence Policy](#)

**! SAFE**  
**Or We Don't Do It**

### Food For Thought



**Q**

I noticed one of my colleagues has not been wearing the required personal protective equipment (PPE) while working in the plant. When I mentioned it to them, they complained that it was uncomfortable and said they didn't think it was necessary. What should I do?

**A**

You should remind your colleague of the importance of wearing the required PPE to protect them from potential injury. You should also discuss it with your supervisor. It is important to speak up about anything that may increase the possibility of injury or contribute to unsafe working conditions.

For more examples and guidance

[CLICK HERE](#)



# We Are Inclusive

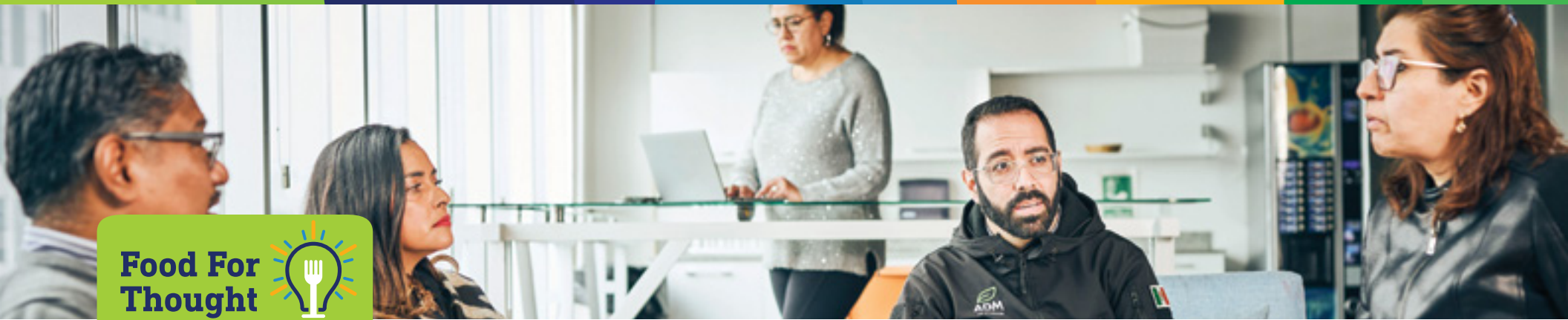
## Diversity, Equity, and Inclusion

We believe that a diverse team is an empowered team and that having an inclusive culture strengthens us and allows us to cultivate the innovation that is critical to our success.

To make a positive impact we must:

- Embrace diversity in race, gender, sexual identity, ethnicity, economic and educational backgrounds, experiences, perspectives, and interests
- Provide all current and prospective colleagues equal opportunity when making decisions that involve recruiting, hiring, training, assigning work, promoting, compensating, or any other term or condition of employment
- Listen intently and make room for different points of view when making decisions
- Work together to create an open, psychologically-safe environment where everyone feels comfortable to be themselves and perform at their very best





**Food For Thought**

**Q** What does our commitment to Diversity, Equity, and Inclusion mean in our day-to-day business?

**A** We believe a diverse team is an empowered team, so we have implemented procedures across the employee life cycle to ensure equal opportunities for all:

- We are committed to diverse talent slates and interview panels during the hiring process
- We ensure our candidate review and selection efforts address and reduce unconscious bias
- We provide specialized mentorship programs to support career acceleration
- We have a dedicated talent review program to ensure we fully support advancement of colleagues from underrepresented backgrounds

**Q** We have a new person on our team that comes from a very different background. I think their unique perspective really adds value to our discussions, but I notice that some people ignore them or discount their ideas without making an effort to understand. I don't want them to get discouraged. What should I do about this?

**A** We believe diverse ideas and opinions bring about innovation, so it is important that everyone feels their participation is valued. We encourage you to support this person in meetings and encourage others to hear them out by reminding them of our commitment to diversity, equity, and inclusion. If you are uncomfortable doing that, seek advice and guidance from your Human Resources professional.

For more examples and guidance

[CLICK HERE](#)





## We Show Respect

### Discrimination, Harassment, and Equal Opportunity

We show respect by treating everyone and everything with care and consideration. We help each other thrive by creating an environment free from discrimination and harassment, where our colleagues can grow and succeed.

To make a positive impact we must:

- **Not discriminate on the basis of race, color, religion, sex, gender identity, national origin, disability, age, sexual orientation, marital status, or any other characteristic protected by law**
- **Not engage in or tolerate unwelcome conduct (sexual or non-sexual) – whether verbal, physical, or visual – that could be intimidating, offensive, demeaning, or create a hostile or abusive work environment**





**Food For Thought** 

While the definition of **harassment** may vary from one location to another, it generally refers to unwelcome conduct related to a person's legally protected characteristics that creates a hostile or abusive work environment. Harassment may be verbal, physical, or visual. It may be non-sexual or sexual in nature. Examples include insults, abusive language, threats, intimidation, slurs, offensive jokes, or visual displays, or unwelcome touching, sexual flirtations, advances, or propositions. We are each responsible for preventing harassment in the workplace. If you ever experience, see, or suspect behavior that violates our commitment to a respectful workplace, speak up.

**Resources**

- [Anti-Harassment Policy](#)

**Q** A co-worker often insults me, then turns around and says, "just kidding." This has been going on for a long time, and it's really upsetting me. Am I overreacting if I raise my concerns about it?

**A** No, you're not overreacting. If it is hurtful to you or interferes with your ability to do your work, you should raise your concern so it can be addressed appropriately.

**Q** I believe a qualified person may have been denied a position because of their race. Since I wasn't actually involved in the hiring process, should I just let it go?

**A** No. You should raise your concerns to determine whether any discrimination took place in the hiring process. If discrimination did occur, it would violate our policy and the law.

For more examples and guidance

[CLICK HERE](#)



# We Protect What's Personal

## Privacy and Data Protection

Each one of us is unique and the data about us is personal. By saying what we do and doing what we say with personal data, we create trust wherever we do business. We ensure responsible data use by following all applicable privacy and data protection laws.

To make a positive impact we must:

- Use only the amount of personal data needed for our business purposes and delete it after these purposes are met
- Be thoughtful and responsible about how we protect and share personal data by using reasonable security measures to prevent loss, misuse, or unauthorized access
- Promptly report any possible data breach (unauthorized access or disclosure) to the Global Data Privacy Office

### Resources

- [Data Privacy Policy](#)

**Food For Thought**



**Personal information or data** includes any information that can reasonably be used to identify, contact, or locate an individual directly or indirectly. Some examples include telephone numbers, email addresses, banking or financial information, government identification numbers, health information, biometrics, race, and ethnicity among other things. Remember, what is considered personal information varies by country, so if you are unsure, seek guidance from the Privacy team at [DataPrivacy@adm.com](mailto:DataPrivacy@adm.com).

For more examples and guidance

[CLICK HERE](#)



# Making a Positive Impact in our Businesses

**We Achieve Excellence**

**We Have Integrity**

**We Follow the Law**

**We Are Transparent**

**We Take Responsibility**

**We Communicate Clearly and Carefully**

**We Practice Teamwork**



## Product Quality and Safety

Every day, all around the world, we demonstrate our commitment to excellence by delivering high-quality products and services. We achieve excellence by being great at what we do and making efforts to continuously improve.

To make a positive impact we must:

- Know and follow the quality and food safety rules, regulations, policies, and procedures that apply to our products
- Consistently deliver excellent service to our customers
- Understand how our actions can directly impact the safety and quality of our products and services, including the food our families and customers consume
- Look for ways to continuously improve
- Speak up immediately if we see something that doesn't meet our standards

## Resources

- [Food Safety and Quality Policy](#)
- [Quality and Food Safety Management System](#)
- [Quality at ADM](#)



## Food For Thought



We've built our Food Safety and Quality program around three pillars:

Achieving best-in-class food safety

Maintaining a culture of quality

Leveraging innovation and technology

**Q**

I think I saw something fall into product being inspected by a colleague. When I told them, they didn't seem concerned and walked away. I am not really sure what I saw, but I am worried that the product could be tainted. What should I do?

**A**

You should report the incident to your manager or supervisor immediately. This way, any affected product can be placed on hold right away, and the incident can be investigated.

For more examples and guidance

[CLICK HERE](#)



# We Have Integrity

## Books and Records / Internal Controls

Our value of Integrity means we are honest and true in everything we do, including maintaining accurate books and records. Our books and records form the basis for making sound business decisions and for ensuring the integrity of the financial statements and disclosures we make to the public.

To make a positive impact we must:

- **Maintain complete, accurate, and timely books and records for our areas of responsibility**
- **Follow all internal controls and applicable accounting policies and legal or regulatory requirements**
- **Comply with our Records Management policy regarding the proper retention and destruction of Company documents**
- **Cooperate with internal and external auditors, investigators, and regulators**
- **Report any actual or suspected accounting or auditing errors or irregularities, or violations of internal controls to the Controller or to Compliance promptly**

## Resources

- [Records Management Policy](#)
- [Anti-Corruption Policy](#)



Anyone who intentionally misrepresents or falsifies information in our books and records, or assists others to do so, has engaged in fraud. Fraudulent activity is against the law and our Code of Conduct, and may result in legal liability for those involved.

If a governmental investigation is to take place, local management must contact Compliance before proceeding.

If you know that documents in your control may be relevant to a lawsuit or government investigation, do not alter, conceal, or destroy any of those documents.



**Food For Thought** 

**Q** If I don't work in Finance or Accounting, do I need to be concerned about the accuracy of our books and records?

**A** Yes. In addition to our financial statements, a record can be anything that documents a business activity, decision, or transaction such as payroll documents, timecards, travel and expense reports, measurement and performance records, customer and supplier records, and design and engineering records. We all have a duty to make sure that the information we submit in all Company records is complete, accurate, timely, and understandable.

**Q** One of my colleagues has committed to spending \$30,000 with a supplier for services in the next year. Since his spending authority is only \$25,000, he asked me to create two purchase orders instead of one so he could avoid asking for higher approval. Is that okay?

**A** No, this action would enable your co-worker to violate important internal controls that are in place to ensure all transactions are properly authorized. You should explain this to them and discuss it with your manager to be sure it doesn't happen again.

For more examples and guidance

[CLICK HERE](#)



## We Follow The Law

We are each responsible to know, understand, and follow the laws and regulations that govern the work we do on behalf of the Company. While we cannot cover all of the laws that apply to our business in this Code, we have included some of the most important ones for all of us to understand. These laws can be complex and may vary by country, so if you have any questions or concerns about the right thing to do, seek advice from the Legal department or Compliance team before taking any action.





## We Follow The Law

### Fair Competition and Fair Dealing

We are encouraged to compete aggressively for business and sales opportunities, but we must always do it the right way. That means that we compete fairly in the marketplace and comply with the laws that promote free and fair competition. These laws, called competition or antitrust laws, vary by country but they generally prohibit activities that can restrict competition.

We must always be extremely careful whenever we interact with our competitors so that there can be no perception that we are engaged in any improper discussions or agreements. Even the appearance of violating competition laws can be a problem.

We must never enter into formal or informal agreements with customers, suppliers, or other business partners that may unfairly restrict competition or participate in other abusive behavior.

We must always engage in fair and ethical sales and marketing practices. This means we truthfully emphasize the quality of our products and services, and never say anything false, disparaging, or misleading about our competitors or their products or services.

We may appropriately gather competitive intelligence that is publicly available or has been provided to us through proper means. We must never attempt to obtain a competitor's confidential or proprietary information directly or through illegal or unethical practices.

Violations of competition and antitrust laws can carry criminal penalties and result in significant civil legal damages for both the Company and individuals involved so if you have any questions, please seek guidance from Compliance.



### Resources

- [Antitrust and Competition Compliance Policy](#)
- [Advertising and Promotion Policy](#)

**Food For Thought**



**Do:**

- ✓ Compete aggressively but fairly
- ✓ Win business based on truthful and accurate statements about the quality of our products and services
- ✓ Acquire competitive information through good work rather than illegal or unethical practices

**Don't:**

- ✗ Discuss pricing, markets, territory, production, or customer information with a competitor
- ✗ Say anything false or misleading about our own or a competitor's products or services
- ✗ Make any agreement that could be seen as restricting competition

For more examples and guidance

[CLICK HERE](#)



## We Follow The Law

## Anti-Corruption

We are committed to doing business with integrity and working to prevent bribery and corruption around the world. As a global company, we follow the anti-corruption laws of every country where we do business.

We must never offer, give, or receive anything of value to or from anyone in an attempt to gain an unfair business advantage or to improperly influence a business decision. To ensure integrity and transparency in our books and records, we ensure all payments and transactions are accurately described and properly recorded.

In some situations, lower-level government officials may seek facilitating payments, or “grease payments,” to complete or speed up routine, non-discretionary government actions. Although facilitating payments may be legal in certain locations where we do business, we strongly discourage them. You must obtain approval from Compliance before offering, promising, authorizing, or making such a payment, no matter how small the amount.

These rules also apply to anyone acting or doing business on our behalf, such as consultants, agents, representatives, subcontractors and joint venture partners. It's simple – if we can't do it, neither can they. We must be diligent in selecting business partners that comply with our standards for doing business in compliance with the law as we may be held responsible for their actions.

If you ever suspect a bribe, kickback, or other prohibited payment has been made, immediately inform your manager and the Compliance team.

## Resources

- [Anti-Corruption Policy](#)
- [Anti-Corruption Resource Center](#)
- [Government Gifting and Hosting Request Form](#)



**Food For Thought**



**Q** Who is considered a government or public official?

**A** Under the law, government or public official is broadly defined and includes:

- Officials and employees at any level of government
- Officials of, and candidates for, political parties
- Employees of public international organizations (such as the United Nations)
- Employees of entities that are owned or controlled by the government
- The family members of any of the above

**Q** Can I give a gift to a government employee?

**A** Special rules apply when interacting with government officials. You must obtain approval from the Compliance team using the Government Hosting and Gifting Request Form before providing any gifts, meals, or entertainment of any value to a government official.

**Q** What is considered a bribe?

**A** “A bribe” is defined as anything of value given or offered with the intent to influence the recipient to act in an employee’s or another person’s favor. Bribes can be monetary payments, such as cash or cash equivalents, kickbacks, excessive commissions, as well as other things of value such as gifts, excessive travel, and entertainment, offers of employment, or any form of preferential treatment.

[CLICK HERE](#)

For more examples and guidance

# We Follow The Law

## Working with Government Customers

We recognize that the rules for doing business with the government are often stricter and more complex than those that govern our sales to commercial customers.

When selling to, buying from, negotiating with, or working with government customers, we must carefully comply with these requirements. If you work on government contracts or interact with government officials, make sure you fully understand the special legal rules and contract terms that apply to that unique relationship. If you have any questions, contact the Compliance team.

A white ADM tanker truck is shown from a side profile. The truck features the ADM logo on the door and the slogan "Unlocking Nature. Enriching Life." on the tank. The truck is parked on a paved surface with trees in the background.

# We Follow The Law

## Anti-Money Laundering

We only do business with those who share our commitment to integrity and following the law. We will not knowingly conduct business with anyone involved in illegal activities such as bribery, fraud, terrorist financing, or money-laundering. Money laundering controls and regulations are fundamental in the fight against terrorism and organized crime. We comply with all anti-money laundering laws in every country where we do business. We are each responsible to know our customers and business partners and to conduct appropriate due diligence to ensure they are meeting these expectations.

### Resources

- [Anti-Money Laundering Policy](#)



Food For Thought



**Money laundering** occurs when money obtained from criminal activities such as terrorism, drug dealing, or fraud are processed through legitimate commercial transactions to conceal the source, avoid reporting, or evade taxes.

Signs that may be indications of money laundering activity include:

- Attempts by a customer to provide false or anonymous information to open an account, or refusal to provide requested information
- Payments made or requested in currencies other than those specified in the contract, or requests to pay more than provided for in the contract
- Orders, purchases, or payments that are unusual or inconsistent with a customer's trade or business
- Payments on behalf of a customer from an unknown or anonymous person or from an unusual non-business account
- Transactions structured to evade reporting requirements in any jurisdiction
- An unusual pattern of transactions, such as bulk purchases of products or gift cards, or repetitive cash payments

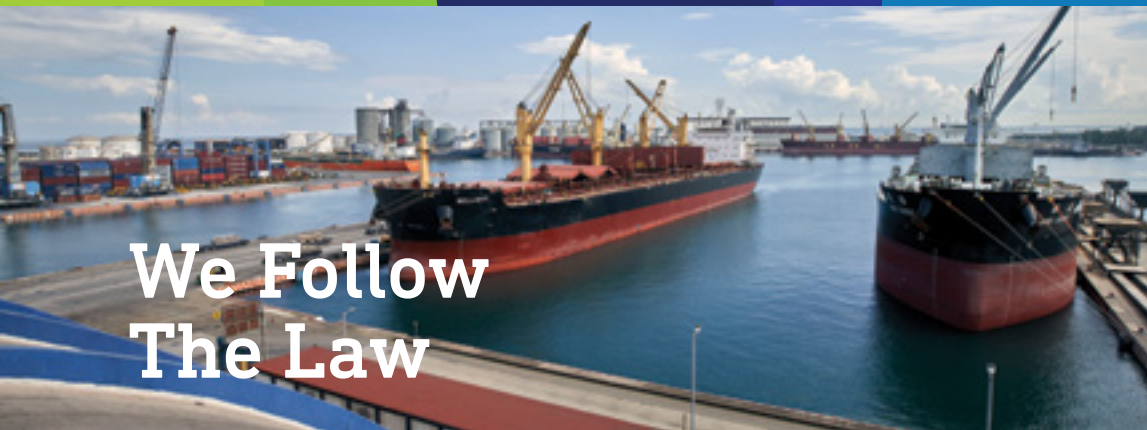
If you see any of these warning signs, notify Compliance.



[CLICK HERE](#)

For more examples and guidance





# We Follow The Law

## International Trade

We ship products and services to countries all over the world and must abide by all applicable laws and regulations regarding international trade in the countries where we do business.

These laws and regulations apply to the movement of products, services, information, or technologies across international borders and include:

- **Controls over imports and exports**
- **Political and economic sanctions that restrict trade with certain countries, entities, or persons**
- **Anti-boycott laws that prohibit us from participating in a boycott by another country not sanctioned by the United States**

Trade regulations are complex and subject to change, and violations can be costly. They usually apply not only to direct business by ADM, but also to indirect business by companies in our supply chains and distribution networks. If you have any questions, seek advice from the Trade Compliance team before taking action.



## Food For Thought



**Economic sanctions** are laws passed by governments that restrict international trade. They usually apply not only to direct business by ADM, but also to indirect business by companies in our supply chains and distribution networks.

**Antiboycott laws** prohibit complying with certain economic sanctions of other countries. In practice antiboycott laws usually deal with the Arab Boycott of Israel.

Review ADM's Trade Sanctions and Antiboycott Policy and be familiar with those countries and territories that present elevated risks and follow the proper procedures when warning signs are present.

## Resources

- [Trade Sanctions and Antiboycott Policy](#)

**Q**

We have been selling product to a supplier but I think they may be reselling it to a company that cannot buy product directly from ADM due to economic sanctions. Do I need to be concerned?

**A**

Yes. Economic sanctions usually apply to any indirect business we have. If we know or should be aware that a third party or distributor is violating economic sanctions, it may implicate ADM. Review ADM's Trade Sanctions and Antiboycott Policy and contact Compliance or the Legal Team if you have questions or concerns regarding a particular situation.

[CLICK HERE](#)

For more examples and guidance

# We Follow The Law

## Insider Trading

During the course of our work at the Company, we may come across material inside information about ADM or one of its business partners. We must remember that:

- We cannot buy or sell stock in ADM or any other company based on inside information
- We cannot provide inside information or a “tip” to a family member, friend, or any other person
- We must avoid even the appearance of violating these rules

Trading on inside information or tipping others to do so is against the law and Company policy and can result in severe consequences for the individuals involved. If you are not sure whether certain information would be considered material inside information or if you have any questions about the laws and regulations that govern securities trading, ask the Legal department before taking any action.



## Food For Thought



**Material inside information** is information that is not yet known to the public (inside) and would be considered important to an investor when making a decision to buy or sell stock (material). Some examples of material inside information include unpublished financial results, potential mergers or acquisitions, new products or other innovation, and changes in senior leadership, among other things.

## Resources

- [Insider Trading Policy](#)
- [Regulation FD \(Fair Disclosure\) Policy](#)



For more examples and guidance

[CLICK HERE](#)

# We Follow The Law



To make a positive impact we must:

- Do business with integrity and in compliance with the law;
- Compete fairly
- Promote transparency and work to prevent bribery and corruption
- Conduct due diligence to know and monitor our customers and business partners
- Follow the rules for dealing with government customers and for trading in securities
- Seek expert guidance if we have any questions about the laws that govern our business





## We Are Transparent

### Conflicts of Interest

We must always act in the Company's best interests and avoid any actual or perceived conflicts of interest.

A **conflict of interest** can arise from any situation where our personal interests, including those of our family members, friends, and associates could interfere with our ability to make sound, objective business decisions on behalf of the Company. If you think you may be involved in a potential conflict of interest, you must be transparent and promptly disclose the situation to your supervisor and the Compliance team using the [Disclosure Tool](#). Most conflicts of interest can either be avoided entirely or resolved easily if they are promptly and properly disclosed.

### Resources

- [Conflict of Interest Policy](#)
- [Conflict of Interest Resource Center](#)
- [Conflict of Interest Disclosure Tool](#)
- [Non-Speculation Policy](#)
- [Government Hosting and Gifting Request Form](#)



# Business Gifts and Entertainment

Business gifts and entertainment can be used to strengthen business relationships, but we must be careful to remain independent and objective in our dealings and we must never use gifts or entertainment in exchange for a favor or to improperly influence a business decision. Gifts and entertainment that are generally acceptable are:

- **Modest in value and will not create, or appear to create, a conflict of interest**
- **Given and received openly and transparently**
- **Infrequent and consistent with good business practices**
- **Not solicited**
- **Not cash, a gift card, or other cash equivalent**
- **Not discounts from suppliers or business partners that are not offered to the general public**
- **Not offered or accepted during active negotiations**
- **Not illegal or against Company policy for either party**

Special rules apply when interacting with government officials. You must obtain approval from the Compliance team using the [Government Hosting and Gifting Request Form](#) before providing any gifts, meals, or entertainment of any value to a government official.

To make a positive impact we must:

- **Act in the Company's best interests and avoid situations that could create a conflict of interest**
- **Use gifts and entertainment responsibly**
- **Be transparent and promptly disclose any potential conflicts of interest**



## Food For Thought



### Principles for Avoiding Conflicts of Interest:

- Do not use your influence at ADM to benefit yourself or others in a way that competes with ADM or could be perceived as improper, such as personally speculating in agricultural commodities processed by ADM
- Do not work for a company that competes with ADM
- Understand and follow the disclosure requirements before you invest in a company that competes with or does business with ADM
- Do not make decisions regarding the selection or evaluation of suppliers if a family member or someone with whom you have a close personal relationship is involved
- Do not exchange gifts or entertainment with suppliers or customers that could impair your business judgment or otherwise create a conflict of interest
- Do not supervise or make employment decisions related to a family member or someone with whom you have a close personal relationship
- Do obtain approval from Compliance before accepting officer or director positions with an outside business or not-for-profit board
- Do ensure that any second job or outside business activities do not interfere with your ability to perform your job at ADM
- Do not use ADM information, assets, or resources for your personal gain or the improper gain of others

Keep in mind, some of these principles also apply to our families and those with whom we have a close personal relationship. Conflicts of interest can be difficult to identify and may arise at any time. If you are ever unsure about a situation, speak with your manager, Human Resources representative, or the Compliance team.

For more examples and guidance

[CLICK HERE](#)



# We Take Responsibility

A photograph of a man and a woman in a professional setting, possibly a meeting or office. The man is on the left, looking towards the woman on the right. They are both dressed in business casual attire. The background is a bright, out-of-focus office environment.

## Safeguarding Company Assets

We each take responsibility to use Company assets efficiently and for business purposes rather than for our personal benefit. We must take ownership and be accountable to protect these assets from loss, damage, theft, waste, or misuse. This includes our physical and financial assets such as equipment, supplies, facilities, IT systems, and funds, as well as our confidential and proprietary information.

Our **confidential and proprietary information** is what sets us apart from our competitors and is one of our most important assets. This information includes our intellectual property (copyrights, patents, trade secrets), financial data, pricing, marketing strategies, costs, product information and recipes, technical data and knowledge, processes, equipment and machinery layout and design, employee personal data, customer and vendor data, legal documents and contracts, and other information and materials not publicly available. We must never disclose confidential information with people outside the Company as this could put us at a competitive disadvantage, damage our reputation, or impact our financial results.

Special security measures must be taken to **prevent unauthorized access to information** contained on our computer systems, portable electronic devices, laptops, mobile phones, and other technology.



## Resources

- [Acceptable Use Policy](#)
- [Data Privacy Policy](#)



## Food For Thought



To make a positive impact we must:

- Act as owners, treating Company assets with care, protecting them from waste, damage, misuse, or theft
- Exercise good judgment and limit any personal use of computers and phones so that it doesn't interfere with our job duties, and never use them for something offensive, illegal, or that would violate Company policy
- Properly store all confidential information in a safe and secure place, use it only for authorized business purposes, and only share it with those who have a business "need to know"
- Respect the confidentiality and intellectual property rights of business partners who trust us with their information
- Physically secure laptops, use strong confidential passwords, take appropriate precautions when accessing the internet, install only authorized software, and be alert for phishing scams or other potential cyberattacks

**Q** How will I know if the information I am working with is confidential?

**A** Usually such information is marked internal, confidential, or restricted. If it isn't, ask yourself these questions:

- Is this information known outside the Company?
- Is it proprietary to us or one of our customers, suppliers, or business partners?
- Is it subject to a non-disclosure agreement?
- Would the Company, or an individual, be disadvantaged or harmed if others had the information?

If the answer to any of these questions is yes, the information should be treated as confidential and properly protected. Remember, our responsibility to protect confidential information continues even after we leave the Company.

For more examples and guidance

[CLICK HERE](#)

# We Communicate Clearly And Carefully

## Internal and External Communications / Social Media

We practice teamwork by effectively communicating and collaborating with our colleagues, customers, and suppliers around the world. We do this every day through email, text messages, instant messages, and other means. It is important that we always choose our words carefully, communicating in a way that is professional, factual, and respectful.

Social media and networking websites have changed the way many of us share information and have created new opportunities for communication and collaboration. It can be used to advocate for our Company and enhance our reputation, but it also has the potential for harm to our Company, our business partners, and our fellow colleagues so it must be used with care.

We may receive requests for information about the Company from members of the media, the finance community, or other external parties. To ensure our Company is represented in a consistent and accurate manner to our public audiences, our External Communications team must approve any such communications with external parties.





To make a positive impact we must:

- **Communicate in a way that is respectful and does not violate the Code or any Company policy**
- **Protect the confidential information of our colleagues, our Company, and our business partners**
- **Contact the External Communications team for guidance before responding to information requests from outside parties**
- **Keep in mind that electronic communications create records that are permanent and retrievable and could affect the reputation of our colleagues and our Company**

## Resources

- [External Communications Policy](#)
- [Social Media Policy](#)
- [Advertising and Promotion Policy](#)



## Food For Thought



**Q** I received a call from a production company regarding a documentary they are filming. The producer said he received approval from External Communications to speak with me. Should I speak with him?

**A** No. If External Communications had approved a media opportunity that involves your cooperation, they would notify you and work with you directly. You should obtain the producer's contact information and notify External Communications of the call.

**Q** I am on the board of an industry association and have been asked to give a presentation on behalf of the association. Do I need approval from External Communications to give this presentation?

**A** Yes. If asked to present publicly on behalf of an industry association, you must obtain approval from External Communications prior to accepting and External Communications must also review your presentation beforehand.

For more examples and guidance

[CLICK HERE](#)



# We Practice Teamwork

## Working with Third Parties

Just as we practice teamwork within our Company to ensure we succeed together, we recognize that strong and healthy relationships with our suppliers and business partners are also critical to our success. We expect our suppliers and business partners to share our commitment to do business fairly, ethically, and in compliance with all applicable laws, regulations, and our Supplier Expectations. We perform initial screenings of potential business partners and may perform additional due diligence and monitoring activities for various purposes, including anti-corruption compliance.

### Resources

- [Supplier Expectations](#)
- [Managing Supplier Non-Compliance Procedure](#)

To make a positive impact we must:

- **Choose our suppliers based on objective business criteria such as quality, service, and cost while avoiding conflicts of interest**
- **Treat our partners fairly, never engaging in any unfair dealing practice such as manipulation, misrepresentation, or concealment of facts, or abuse of confidential information**
- **Clearly communicate our Supplier Expectations to the suppliers and business partners with whom we work**
- **Speak up if we believe a supplier or business partner is not meeting our expectations**

[CLICK HERE](#)

For more examples and guidance



We expect our suppliers to:

- ✓ Comply with all applicable laws and regulations, including those related to anti-corruption, anti-money laundering, anti-terrorist financing, and trade sanctions
- ✓ Maintain accurate books, records, and accounts related to our business
- ✓ Avoid conflicts of interest and follow our gifts, meals, and entertainment guidance
- ✓ Support human rights and promote environmental responsibility
- ✓ Safeguard our confidential information, including personal and proprietary data
- ✓ Provide products and services that are safe, meet agreed upon specifications, and comply with all applicable laws and regulations





# Making a Positive Impact in the Global Community

We Care for Others

We Are Good Stewards of Our Environment

We Are Good Citizens





# We Care For Others

## Human Rights

Our purpose is to unlock the power of nature, to enrich the quality of life. In so doing, we commit to protect and respect the human rights of our colleagues, those within our value chain, and in the communities in which we operate. We expect our business partners to share in this commitment by adopting similar policies.

### Resources

- [Human Rights Policy](#)
- [Supplier Expectations](#)
- [Managing Supplier Non-Compliance Procedure](#)

To make a positive impact we must:

- **Promote a safe, healthy, and respectful workplace free of discrimination and harassment**
- **Comply with all applicable wage and hour and other employment laws**
- **Respect employees' right to join, form, or not to join a labor union without fear of reprisal, intimidation, or harassment**
- **Prohibit child labor and all forms of modern slavery, including forced labor, bonded labor, indentured labor, and human trafficking**



**Food For Thought** 

**Q** After visiting the facility of one of our suppliers, I suspect the supplier may be employing underage workers. What should I do?

**A** We expect our suppliers to follow the law and uphold our commitment to human rights, including our prohibition of child labor. You should raise your concern to your manager or the Compliance team so it can be properly investigated, and corrective action taken, if needed.



For more examples and guidance

[CLICK HERE](#)

# We Are Good Stewards of Our Environment



## Environmental Sustainability

We know that the health of our environment and natural resources is critical to our future, and that our commitment to sustainable practices will result in a stronger company and a better world. Being resourceful means we make it work the right way by understanding the impact our business has on the environment and working together to mitigate environmental risks and ensure we conduct our business in a sustainable manner.

To make a positive impact we must:

- **Comply with all applicable environmental laws, regulations, and Company policies**
- **Look for ways to continuously improve our efforts**
- **Encourage environmentally sustainable behavior in our customers, suppliers, and other business partners**
- **Maintain our equipment to prevent spills and releases**

## Resources

- [Policy to Protect Forests, Biodiversity and Communities](#)
- [Supplier Expectations](#)
- [Managing Supplier Non-Compliance Procedure](#)
- [Sustainability Commitments](#)



## Food For Thought



“ADM is paving the way with good business practices, progressive solutions, and mindful actions that make a positive impact on the environment.”

**Q** I noticed a colleague back-dating inspections and pressure differential readings required by our air permit. I don't think we were ever outside the permit limits, but I don't feel comfortable back-dating. What should I do?

**A** Accurate records are a critical piece of our compliance programs. You should intervene with your colleague. You should also discuss with your supervisor. It is better to identify and correct the reasons for a missed inspection than to make a false representation. Mismanagement or false representation of records may be subject to disciplinary actions up to and including termination.

For more examples and guidance

[CLICK HERE](#)





# We Are Good Citizens

## Charitable Activities / Political Activities

We work to sustain and strengthen communities where our colleagues work, live, and operate by funding initiatives and organizations that drive meaningful social, economic, and environmental progress. We do this through ADM Cares, our corporate social investment program that coordinates charitable contributions, volunteering opportunities and partnerships with organizations that share our mission focused on sustainability, hunger relief, and education.

Our Company may engage in the political process or contribute to political candidates or campaigns only where permitted by law and with the prior written approval of the CEO or the Government Relations department.

In addition to Company-sponsored activities, colleagues may choose personally to participate in charitable or political activities. If we choose to do so, we must do it on our own time, with our own funds, and be clear that we are acting as individuals and do not represent the Company. We may not use Company resources, including funds, time, property, equipment, or personnel for these personal activities. We may not pressure or attempt to influence our colleagues to support any candidate or cause, or to make a personal contribution.

To make a positive impact we must:

- **Improve the wellbeing of the communities in which we operate by supporting or participating in activities organized by ADM Cares**

## Resources

- [ADM Cares Contributions Policy](#)



**Food For Thought** 

**Q** My manager asked me to make a personal contribution to a charitable organization where he is on the Board. I am worried my manager will be upset if I don't agree to make the contribution. What should I do?

**A** Personal charitable and political contributions are a personal decision. No one should pressure others to make contributions or otherwise support a cause. You should speak with your Human Resources representative if you are unsure how to address this with your manager.

**Q** I am working on a local political campaign. Is it okay to send information about the candidate to my work colleagues and others using my Company laptop and email address?

**A** No. While you are encouraged to find ways to get involved in your community, it is not appropriate to use your Company email address or Company resources to support your personal political activities, nor is it appropriate to solicit contributions from your work colleagues. When personally participating in political activities, we must do it on our own time, with our own resources and be clear we are not representing the Company.

For more examples and guidance

[CLICK HERE](#)



# Helpful Resources

Policies

Additional Resources

The ADM Way Helpline

Key Contacts

Administration



# Policies

- **Acceptable Use Policy**
- **ADM Cares Contributions Policy**
- **Advertising and Promotion Policy**
- **Anti-Corruption Policy**
- **Anti-Harassment Policy**
- **Anti-Money Laundering Policy**
- **Antitrust and Competition Compliance Policy**
- **Conflict of Interest Policy**
- **Data Privacy Policy**
- **Environmental, Health, and Safety Policy**
- **External Communications Policy**
- **Food Safety and Quality Policy**
- **Human Rights Policy**
- **Insider Trading Policy**
- **Life Critical Standards Policy**
- **Non-Speculation Policy**
- **Policy to Protect Forests, Biodiversity, and Communities**
- **Quality and Food Safety Management System**
- **Records Management Policy**
- **Regulation FD (Fair Disclosure) Policy**
- **Social Media Policy**
- **Supplier Expectations**
- **Trade Sanctions and Antiboycott Policy**
- **Workplace Threats and Violence Policy**



# Additional Resources

In addition to the policies linked throughout the Code, additional Company policies can be found in the [Policy Center](#) on ADM Inside.

- **Anti-Corruption Resource Center**
- **Conflict of Interest Disclosure Tool**
- **Conflict of Interest Resource Center**
- **Frequently Asked Questions**
- **Government Hosting and Gifting Form**
- **Quality at ADM**

## The ADM Way Helpline

The ADM Way Helpline is hosted by a third-party provider and can be used to ask questions or raise concerns in a confidential and anonymous manner.

You may access the ADM Way Helpline via the internet at [www.theadmwayhelpline.com](http://www.theadmwayhelpline.com) or by telephone as follows:

*The ADM Way Helpline is also accessible using your mobile phone by scanning the QR Code to report concerns or ask questions.*



## Key Contacts

If you have any questions about the content in the Code, or you would like to raise a concern, contact Compliance:



### By Email

[compliance@adm.com](mailto:compliance@adm.com)



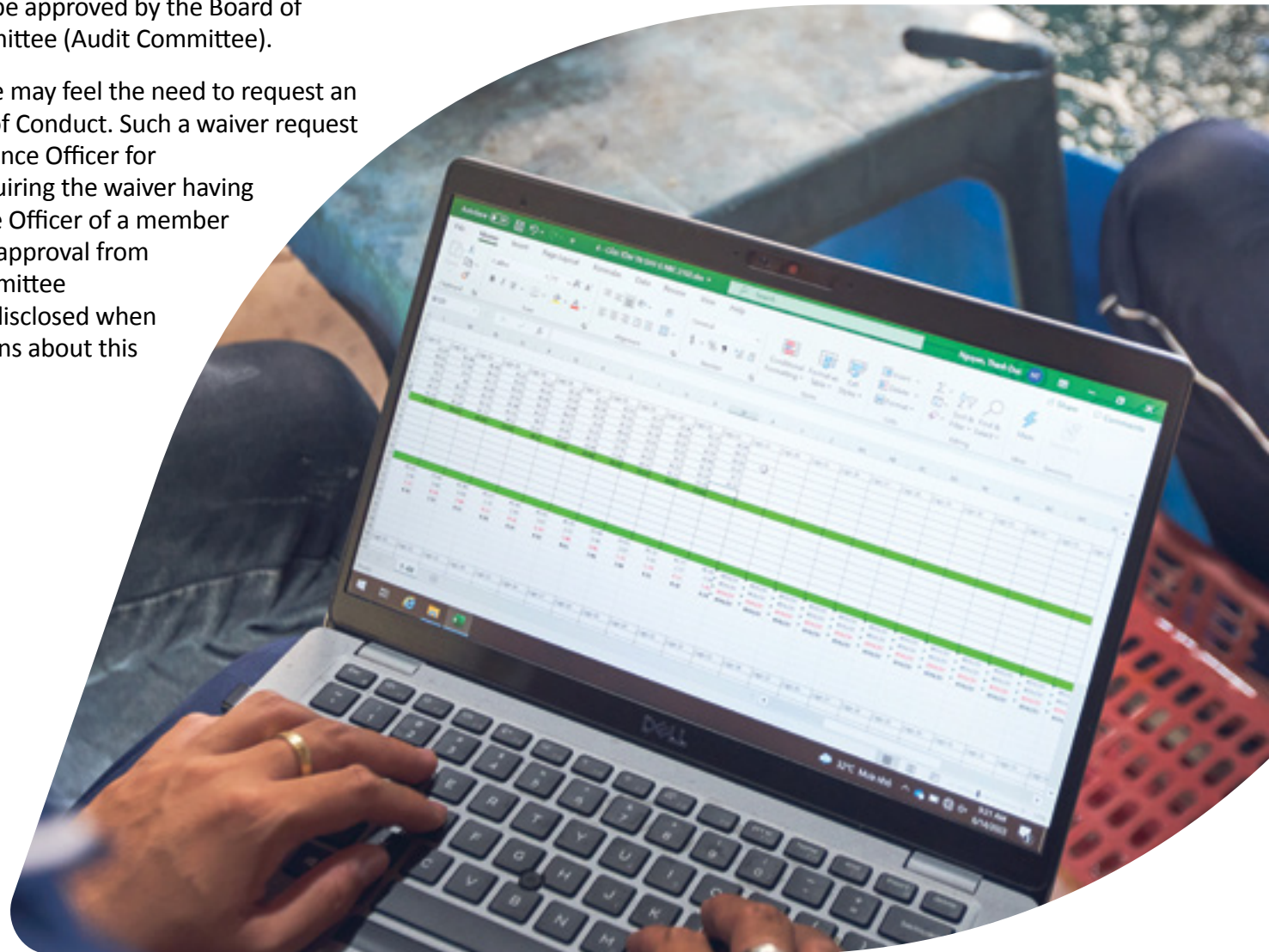
### By Mail

Compliance  
Archer Daniels Midland Company  
PO Box 1470  
Decatur, IL 62526  
USA

# Administration

Our Company may modify the Code of Conduct from time to time as necessary to respond to changing laws, regulations, and Company policies. Amendments to the Code will be approved by the Board of Directors or an appropriate Board committee (Audit Committee).

In very rare circumstances, an employee may feel the need to request an exception from some part of the Code of Conduct. Such a waiver request must be submitted to the Chief Compliance Officer for written approval prior to the action requiring the waiver having taken place. Any waiver for an Executive Officer or a member of the Board of Directors requires prior approval from the Board or an appropriate Board committee (Audit Committee) and will be publicly disclosed when required by law. If you have any questions about this process, please contact Compliance.



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