

# ADM Supplier Expectations



ADM recognizes that healthy supplier relationships are critical to our success and strives to promote a mutually beneficial business relationship based on the highest standards of ethical conduct. We choose our suppliers carefully to ensure that they share our commitment to integrity. Suppliers to ADM are expected to do business fairly, ethically, and in compliance with all applicable laws and regulations at all times. Additionally, suppliers are expected to understand and abide by the following principles.

- **Bribery** – ADM prohibits corruption in any form and expects the same from its suppliers. This means that suppliers must not offer or accept any bribes, kickbacks, or other unethical payments when dealing with a government official or with any other business. Suppliers must at all times comply with the [U.S. Foreign Corrupt Practices Act](#) as well as all local anti-corruption laws prohibiting commercial and governmental bribery. ADM requires suppliers to participate in its due diligence review process prior to interacting with a government official on the company's behalf.
- **Business and Financial Records** – We expect suppliers to maintain accurate financial books, records, and accounts related to its business with ADM. Suppliers must keep an accounting of all payments (including any gifts, meals, entertainment or anything else of value) made on behalf of ADM or out of funds provided by ADM. Suppliers must furnish a copy of this accounting to ADM upon request. Suppliers may also be required to retain certain documentation related to food safety and product traceability (origin mapping).
- **Business Gifts, Meals and Entertainment** – Suppliers should avoid offering ADM employees travel, frequent meals or expensive gifts. Ordinary business meals and small tokens of appreciation of nominal value are acceptable. Gifts of cash or cash equivalents, such as cash gift cards, are prohibited.
- **Conflicts of Interest** – ADM employees should not have any financial interest or employment arrangement with a supplier that might conflict, or appear to conflict, with the employee's obligation to act in the best interest of ADM. If a supplier employee has a family relation (spouse, child, parent, sibling, grandparent, mother- or father-in-law, sister- or brother-in-law, grandchild, domestic partner) to an ADM employee, or if the supplier has any other relationship with an ADM employee that might represent a conflict of interest, the supplier should disclose this fact to ADM or ensure that the ADM employee does so. Friendships between suppliers and ADM employees are inevitable and acceptable, but should not be used to influence business decisions.
- **Human Rights and Environmental Responsibility** – We expect suppliers to respect freedom of association and collective bargaining, to support diversity and equal opportunity in their workplace, and to promote the health and safety of all parties. Suppliers must also adhere to laws related to working hours, wages, human trafficking, and the prevention of child labor and forced labor. Suppliers are expected to conduct business consistent with ADM's commitment to the environment.
- **Information Protection** – Suppliers are expected to secure and safeguard confidential ADM information they obtain as part of the business relationship. Similarly, suppliers should not share with anyone at ADM information related to any other company if the supplier is under a contractual or legal obligation not to share this information.
- **Product Safety and Quality** – We expect our suppliers to provide products and services that are safe, suitable in meeting agreed upon and represented specifications, and compliant with all applicable laws and regulations.
- **Trade Sanctions** – ADM expects its suppliers to comply with applicable trade sanctions laws and regulations of countries in which it conducts business. In connection with the business it does with ADM, suppliers must refrain from engaging in any transaction with a sanctioned party or country (unless otherwise authorized by ADM's Legal department), or using another party to carry out any activity that cannot be lawfully performed directly due to trade sanctions prohibitions.
- **Reporting Potential Misconduct** – Suppliers may direct questions or report concerns to ADM via postal mail: P.O. Box 1470, Decatur, IL, USA 62525; email: [compliance@adm.com](mailto:compliance@adm.com); telephone: +1-800-637-5843 ext. 4929; or online: [www.theadmwayhelpline.com](http://www.theadmwayhelpline.com). Reports may be made anonymously where permitted by law.