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ADM.COM

California Transparency in Supply Chains Act Disclosure

The California Transparency in Supply Chains Act of 2010 (Cal. Civ. Code § 1714.43) strives for the elimination of slavery and human trafficking in product supply chains and requires certain companies to disclose efforts to achieve those goals.

ADM companies (ADM) respect human rights and expect our business partners to also 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. We implement the following programs and policies related to our human rights commitments.

Corporate Programs and Policies

Supplier Mandate

We expect all suppliers to:

- Know, understand, and follow laws and regulations that govern work done on our behalf
- Never use child labor or forced or bonded labor
- Refrain from using labor brokers who charge fees to job-seekers in exchange for employment
- Have appropriate measures in place to ensure eligibility for employment
- Compensate workers in accordance with all applicable local laws and regulations
- Provide working conditions that comply with applicable laws and industry norms

Compliance Assurance

- SEDEX Membership and Auditing
 - SEDEX (Supplier Ethical Data Exchange) is a not-for-profit organization dedicated to driving improvements in responsible and ethical business practices in global supply chains, including labor standards.
 - Select ADM facilities register with SEDEX and periodically host and complete SEDEX audits.
- ADM Way Helpline
 - ADM hosts 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.
- Our Commitment to Respect for Human Rights
 - Aimed at ensuring our colleagues, suppliers and contractors respect workers' rights and comply with all applicable local, national and international laws governing working conditions.
 - Contains strict prohibitions against the use of child labor, forced labor and bonded labor, and includes several other guidelines to protect workers from exploitation.
 - Creates an implementation framework for identifying, assessing and addressing potential human rights risks in our supply chain.

- Appropriate action taken against suppliers when we learn that they do not satisfy our principles to respect human rights or misrepresent the conditions under which crops, goods or services have been produced.
- Actions taken if a supplier does not demonstrate a good-faith effort to address issues in a timely manner may include exclusion from new direct contracts or termination of our relationship.

Training

- ADM Colleagues receive annual Code of Conduct training which reinforces the duty to know and abide by our Company's core values, policies, procedures and guidelines.

The Code of Conduct training:

- includes elements of ADM's commitment to respect human rights
- outlines our expectations that business partners treat their employees with dignity and respect, and follow local employment laws
- states that ADM will never knowingly use any suppliers who employ or exploit legally underage workers or forced labor.

Product-Based Programs and Policies

Soy

- Signatory to the National Agreement to Eradicate Slave Labor in Brazil
 - Commitment to refrain from negotiating with companies included in the "Lista Suja," or "dirty list," maintained by the Brazilian Ministry of Labor.
- ADM Responsible Soy Standard
 - Participating growers in Brazil face periodic audits that will assess their adherence to a broad set standards, including labor practices and legal compliance.
- Member of the Round Table on Responsible Soy
 - International organization whose certification system assures that soybeans originate from a process that includes responsible labor conditions.
- Doing it Right (*Produzindo Certo*)
 - Effort with Aliança da Terra, a not-for-profit sustainable farming group founded by farmers, to educate Brazilian farmers and emphasize fair labor conditions.
- Our Commitment to No-Deforestation
 - Working with The Forest Trust, a global environmental not-for-profit organization, to map our soybean supply chain and create action plans that incorporate implementation elements of Our Commitment to Respect Human Rights.

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 their derivatives.
- Member of the Roundtable on Sustainable Palm Oil (RSPO)
 - International 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.
- Our Commitment to No-Deforestation
 - Working with The Forest Trust, a global environmental not-for-profit organization, to map our palm oil supply chain and create action plans that incorporate implementation elements of Our Commitment to Respect Human Rights.
- Business will not be conducted with suppliers who violate our palm oil supply chain policies repeatedly and refuse to take action to comply.

Cocoa

- ADM's Commitment to Sustainable Cocoa
 - Requirement to never knowingly use cocoa suppliers that exploit underage workers, force labor or traffic children.
 - Requirement to never knowingly purchase cocoa beans that have not been produced under working conditions consistent with national labor regulations, including those related to child labor.
 - Discovery that a supplier has misrepresented the conditions under which their cocoa bean supply has been produced will result in termination of our contract with that supplier.
- Member of The International Cocoa Initiative (ICI)
 - Diverse stakeholder group established to oversee and sustain efforts to eliminate the worst forms of child labor and forced labor in the growing and processing of cocoa beans and their derivative products.
- ADM Sustainability Seminars
 - Educate cocoa growers about a number of topics, including labor practices.
- ADM's Socially & Environmentally Responsible Agriculture Practices (SERAP) Program
 - Rewards West African and Indonesian cooperatives and farmers committed to addressing social and environmental issues, including labor issues.
- The World Cocoa Foundation's (WCF) African Cocoa Initiative (ACI)
 - Multi-year effort by various stakeholders, including the U.S. Agency for International Development (USAID), to educate thousands of West African cocoa farmers on topics that include labor standards.