



ADM UK TAX STRATEGY

Financial year ended 31 December 2020

This page sets out the strategic tax objectives for the Archer Daniels Midland (“ADM”) UK group of companies.

ADM and the Board of Directors of the ADM UK entities regard the publication of this document as complying with the duty under Schedule 19 Finance Act 2016 to publish the UK tax strategy for the current financial year for all ADM UK entities. In this strategy, references to ‘ADM UK’ are to all UK companies within the ADM group.

Our tax strategy is reviewed periodically. The Chief Financial Officer of the ADM group is ultimately responsible for management of the tax affairs of the group. The EMEA Tax Department, headed by the ADM EMEA Tax Director, located in Rolle, Switzerland, is responsible for the day-to-day management and coordination of the tax affairs of entities in the EMEA region, including the ADM UK entities.

This strategy applies from the date of publication until it is superseded.

The tax strategy sets out the group's general tax arrangements as well as the policy and approach to tax risk management, attitude to tax planning and working with HMRC.

Aim and Alignment with group policy

As part of a multinational group we are aligned with and follow the wider ADM guiding principles, code of conduct and tax policy for the group. The latest tax policy can be found on the webpage of ADM: <https://assets.adm.com/Sustainability/Tax-policy.pdf>

Guiding principles

We act as a responsible global corporate tax citizen in compliance with applicable tax law and regulations.

We encourage ethical and transparent business practices and do not employ legal entities for purposes of tax avoidance. We encourage an open and honest dialogue between tax policy makers and the business segment.

We make tax part of every important business decision.

We report and disclose our tax positions in accordance with applicable regulations and requirements.

Tax code of conduct and tax policy at ADM

We are committed to provide transparent and accessible information to tax administrations in order to facilitate an understanding of our tax strategy and the underlying business models. We promote an open and honest dialogue between tax policy makers and businesses as the basis of our daily work.

We see the strict compliance with the legal framework set by national legislators as our obligation.

We meet internationally recognized standards by applying transfer pricing policies such as the arm's-length principle. This approach is consistent taking in all countries that ADM operates in and ensuring appropriate remuneration where the value is created.

The increasing complexity and uncertainty in the international and national tax systems requires us to have mechanisms in place that ensure all policies and regulations are adhered to. It is our primary

objective to act in accordance with the respective tax laws in the countries we operate in. We are committed to complying with our tax obligations and maintaining good relationships with HMRC. To do this we only engage in reasonable tax planning that is aligned with our commercial, economic and reputational goals. We keep HMRC informed of business activities, results and key developments and pro-actively disclose and resolve issues, risks and uncertain tax positions.

ADM in the UK

For more than a century, the people of Archer Daniels Midland Company (NYSE: ADM) have transformed crops into products that serve the vital needs of a growing world. ADM's operations encompass agricultural producing and consuming regions on six continents, with a global network of agricultural sourcing, processing, transportation and financial services. Headquartered in Chicago, Illinois, ADM has over 38,000 employees and more than 340 food and feed processing locations. The primary business segments of ADM are Agricultural Services and Oilseeds, Carbohydrate Solutions, Nutrition and Other. ADM has one of the most extensive agricultural operations in the U.K. This includes one of the UK's largest import and distribution business of non-grain feed ingredients, a crop origination and marketing business, storage, freight and logistic services, seven flour mills, two oil refineries, a pulse and seed processing plant, an oils & fats packaging facility, a probiotic supplement manufacturing facility and a flavors and specialty ingredients sales office, altogether employing approximately 1,300 people. Alongside these operations is ADM Investor Services International Limited, ADM's London-based investor services branch resulting in the UK representing all of ADMs business segments.

Tax strategy and strategic objectives

Generally the tax strategy and strategic objectives are intended to establish a clear and unequivocal approach to all aspects of tax reporting and compliance in every segment the company operates. The tax strategy is focused on ensuring that taxes (and tax risks) are managed to provide outcomes consistent with commercial reality and are within the parameters of the Group's strategic objectives. The strategy also requires that all tax obligations are complied with in the UK and other relevant jurisdictions.

With the tax landscape constantly changing, ADM UK's tax affairs and tax risk management procedures are regularly reviewed to ensure that processes and measures are up-to-date so that we are able to identify, assess, manage and mitigate tax risk as well as being aligned with the ADM Group's business strategy and governance framework.

Tax risk management and risk appetite

The management of ADM UK tax affairs is provided by the ADM EMEA Tax Department, supported by the local UK finance teams. The day to day management of employment taxes is provided by the UK HR team, supported by the HR Department in Rolle, Switzerland. Processes relating to different taxes are allocated to appropriate specialist functions within the tax team who carry out a review of activities and processes to identify key risks and mitigating controls in place. These key risks are monitored for changes in business and legislation and processes and controls are updated accordingly. ADM seeks to reduce the level of tax risk arising from its operations as far as is practically reasonable by having in place ADM Tax Department Controls, Procedures and Protocols, which are updated periodically. All entities in the EMEA region, including the UK, have to comply with and adhere to said ADM Tax Department Controls, Procedures and Protocols.

Attitude to tax planning

ADM UK utilizes tax reliefs and allowances available in the manner in which intended by HMRC and statute. There will, however, be circumstances where this manner may not be clearly defined, or where

alternative approaches may result in differing tax outcomes. The Group will use its best judgment in determining the appropriate course of action, using available reliefs and incentives where possible and liaising with HMRC where appropriate.

ADM UK does not engage in artificial tax arrangements and ensures that the outcomes are consistent with commercial realities.

ADM UK endeavors to be considered a low risk taxpayer by HMRC and we only structure our affairs based on sound commercial principles and in accordance with the ADM Group policy and relevant tax legislation. Aggressive tax planning is not proactively undertaken, and external advice is sought where appropriate.

Relationship with HMRC

It is ADM UK's general policy to be transparent and proactive in all interactions with HMRC through regular meetings and communications with HMRC.

We have an open, honest and positive working relationship with HMRC. We are committed to prompt disclosure and transparency in all tax matters with HMRC. We recognize that there will be areas of differing legal interpretations between ourselves and HMRC and where this occurs, we will engage in proactive discussion to bring matters to as rapid a conclusion as possible.

Any inadvertent errors in submission of tax returns and tax computations to HMRC are fully disclosed as soon as reasonably practicable after they have been identified.

UPDATED: DECEMBER 2020