



May 9, 2025

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. Introduction

Archer-Daniels-Midland Company and its subsidiaries (the "Company" or "ADM") unlock the power of nature to enrich the quality of life. The Company is an essential global agricultural supply chain manager and processor, providing food security by connecting local needs with global capabilities. ADM is a premier human and animal nutrition provider, offering one of the industry's broadest portfolios of ingredients and solutions from nature. The Company is a trailblazer in health and well-being, with an industry-leading range of products for consumers looking for new ways to live healthier lives. ADM is a cutting-edge innovator, guiding the way to a future of new consumer and industrial solutions. ADM is a leader in sustainability, scaling across entire value chains to help decarbonize the multiple industries it serves. Around the globe, the Company's 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 ADM's 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 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 has a strict human rights policy, 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. We have been a signatory of the United Nations Global Compact since 2016. In order to enforce these standards, we have implemented a human rights due diligence program which embeds human rights into policies & management systems, identifies and assesses human rights risks, provides mitigation and corrective actions, offers access to remedy where appropriate, and communicates our actions through our [corporate reports](#).

II. ADM Structure and Operations

ADM is a truly global company of approximately 44,000 employees working together to achieve extraordinary results. The Company's operations are organized, managed, and classified into three reportable business segments: Ag Services and Oilseeds, Carbohydrate Solutions, and Nutrition. Each of these segments is organized based upon the nature of products and services.

- The Ag Services and Oilseeds segment includes global activities related to the origination, merchandising, transportation, and storage of agricultural raw materials, and the crushing and further processing of oilseeds such as soybeans and soft seeds (cottonseed, sunflower seed, canola, rapeseed, and flaxseed) into vegetable oils and protein meals. Oilseeds products produced and marketed by the segment include ingredients for food, feed, energy, and industrial customers. The Ag Services and Oilseeds segment is also a major supplier of peanuts and peanut-derived ingredients to both the U.S. and export markets. Additionally, the segment also includes agricultural commodity and feed product import, export, and global distribution, and structured trade finance activities. This segment also includes the Company's share of the results of its equity investments in Wilmar, Pacificor, Stratas Foods LLC, Edible Oils Limited, Olenex, SoyVen, and Gradable.
- The Carbohydrate Solutions segment is engaged in corn and wheat wet and dry milling and other activities. The Carbohydrate Solutions segment converts corn and wheat into products and ingredients used in the food and beverage industry including sweeteners, corn and wheat starches, syrup, glucose, wheat flour, and dextrose. By fermentation of dextrose, the Carbohydrate Solutions segment produces alcohol and other food and animal feed ingredients. Carbohydrate Solutions also produces citric acids which are used in various food and industrial products. The Carbohydrate Solutions segment is a leader in carbon capture and sequestration. This segment also includes the Company's share of the results of its equity investments in Hungrana Ltd., Almidones Mexicanos S.A., Aston Foods and Food Ingredients, Red Star Yeast Company, LLC, and LSCP, LLLP.
- The Nutrition segment serves various end markets including food, beverages, and nutritional supplements for humans, and complete feed, feed premix and additives, petfood and pet treats for livestock, aquaculture, and pets. The segment engages in the creation, manufacturing, sale, and distribution of a wide array of ingredients and solutions including plant-based proteins, natural flavors, flavor systems, natural colors, emulsifiers, soluble fiber, polyols, hydrocolloids, probiotics, prebiotics, postbiotics, enzymes, botanical extracts, and other specialty food and feed ingredients and systems. The Nutrition segment also includes activities related to the procurement, processing, and distribution of edible beans, the processing and distribution of formula feeds and animal health and nutrition products and the manufacture of contract and private label pet treats and foods. This segment also includes the Company's share of the results of its equity investments in Vimison S.A. de C.V., ADM Matsutani LLC, Matsutani Singapore Pte. Ltd., ADM Vland Biotech Shandong Co., Ltd., Dusial S.A., and Vitafort ZRT.

III. ADM's Policies Related to Human Rights in our Supply Chain and Operations

A. Governance

The Sustainability and Technology Committee of the Board actively oversees the Company's objectives, goals, strategies, and activities relating to sustainability. The Sustainability Committee also oversees the Company's compliance with sustainability laws and regulations, assesses performance relating to industry benchmarks, and assists the Board of Directors in overseeing the Company's operations as a sustainable organization and responsible corporate citizen in order to enhance shareholder value and protect ADM's reputation. The Company's Chief Sustainability Officer, Senior Vice President of Global Operations, and Chief Technology Officer regularly attend committee meetings as management representatives. The Executive Council of ADM, the Company's highest strategic and operational body, provides close supervision of the Company's ESG efforts and in-depth review of sustainability issues. Furthermore, regional sustainability teams, along with the corporate sustainability team, support the Chief Sustainability Officer to drive sustainability efforts in the Company's facilities and supply chains around the world. ADM's sustainability efforts are also supported by functional expertise throughout the Company such as in Operations and Utilities, Supply Chain and Procurement, Agricultural Services and Oilseeds, and Environmental Health and Safety.

B. ADM's Policies

Our [Code of Conduct](#) is fundamental to everything we do at ADM. We take seriously our commitments to make a positive impact on our people, in our businesses, and in the global community. By sharing our Code and specific applicable policies with colleagues and business partners, we communicate what is expected and strengthen our culture of integrity.

As part of the onboarding process, ADM employees receive training on the Code of Conduct. All employees take part in annual training designed to ensure that their actions consistently align with the company's commitment to integrity and ethical business practices.

The [ADM Human Rights Policy](#) outlines our commitments to human rights. Approved by our Chief Executive Officer, the policy is guided by the United Nations Guiding Principles on Business and Human Rights (UNGPs), the International Bill of Human Rights, and the International Labour Organization (ILO) Fundamental Principles and Rights at Work. This policy addresses, though is not limited to, the following key areas:

- Forced, Bonded, or Compulsory Labor - ADM prohibits the use of all forms of forced labor, including bonded labor, indentured labor, and child labor in our operations and our supply chains. Employees should not be charged fees in exchange for employment or have collateral in the form of money, identification or other personal belongings held – without workers' consent – as a condition of employment. The use of physical punishment, threats of violence or other forms of abuse will not be tolerated.

- Child Labor - ADM prohibits child labor, defined as work that is hazardous to children's health, safety or morals, work that interferes with compulsory education or 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 - ADM prohibits 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.

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.

Our policies have been translated into key languages to ensure broad understanding across global supply chains. Our Supplier Expectations are embedded into procurement contracts on a regional and business unit basis as part of ADM's global supply chain program.

IV. Identifying and Assessing Forced Labor and Child Labor Risks

Facilitated by an independent third party, ADM has identified the human rights salient risks inherent to our operations and supply chain, which include forced labor and child labor. These risks have been integrated into ADM's human rights risk assessment framework.

The 2024 risk assessment analyzed the social risks associated with specific commodities along with the salient risks in the countries of origin for 99% of the total volume of commodities sourced by ADM during the 2023 calendar year. By mapping our supply chain and identifying the highest risk profiles, ADM can work to prevent or mitigate adverse human rights impacts on local communities and influence positive change.

The risk assessment was conducted through three phases:

- Phase 1: Commodity

This phase was designed to assess the risk of 25 in-scope commodities based on the social risk associated with the production (workforce profile, businesses practices and production characteristics).

- Phase 2: Geography

Building on the results from phase one, several social indices were assessed to identify the salient risks associated with the 76 countries of origin of the in-scope commodities.



- Phase 3: Leverage

Leveraging the insights derived from both phases 1 and 2, this phase focused on the prioritization of high-risk commodities and their respective countries of origin, based on purchased volumes, while categorizing those with similar characteristics into distinct clusters for more targeted analysis.

We used these results to assess the scale, scope, and irremediability of potential human rights impacts identified in our high risk supply chains, helping us to develop a long-term strategy to address and prevent systemic human rights issues.

V. Potential Risks & Risk Mitigation Programs

ADM is committed to preventing, mitigating, addressing, and, where appropriate, providing access to remedies for human rights violations across our supply chain and operations. In 2024, four areas were identified as priorities based on their risk and ADM's leverage and position within the supply chain.

A. South American soybeans

- Through our Policy to Protect Forests, Biodiversity and Communities, we commit 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. If supplier engagement is not successful and/or accusations of violations are severe, ADM will suspend business with suppliers who violate our policies and refuse to take action to comply. For more information, please go to 'Soy Supply Chain' reports available on our [website](#).
- We have partnered with specialized firms utilizing GIS technology (satellite imaging) to cross-reference the planted areas of our direct suppliers in high-risk regions. This process ensures that the soy we source complies with our policies. Additionally, farms are verified to confirm that there are no environmental violations, encroachment on protected areas or indigenous territories, or labor practices that contravene our policy. In 2024, ADM detected 2,000 yellow flags that went through a deeper investigation that ended up blocking 10% of the cases for non-compliances.
- ADM is a signatory to the National Agreement to Eradicate Slave Labor in Brazil. We are committed to refraining from negotiating with companies included in the "Lista Suja," or "dirty list," maintained by the Brazilian Ministry of Labor.
- ADM is an active participant of the Sustainability and Human Rights commission at ABIOVE, the Brazilian Association of Vegetable Oil Industries (ABIOVE).
- ADM is a member of the World Business Council for Sustainable Development (WBCSD) which unites companies across the world that share the same goals regarding No Deforestation and No Exploitation in their supply chains.
- ADM's Responsible Soybean Standard (ARS) is a voluntary certification program that promotes sustainable soybean farming practices across five key areas: legal compliance, social and community protection, environmental stewardship, good agricultural practices,

and traceability. Through annual inspections, ADM ensures that suppliers adopt practices that protect biodiversity, uphold fair labor standards, and comply with national laws.

- ADM is 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.

B. Global palm

- Through our Policy to Protect Forests, Biodiversity and Communities, we commit 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. If supplier engagement is not successful and/or accusations of violations are severe, ADM will suspend doing business with suppliers who violate our policies and refuse to take action to comply. For more information, please go to 'Global Palm' reports available on our [website](#).
- To monitor compliance with our standards, direct palm suppliers are annually assessed by a third party on the robustness of their sustainability programs. The most recent assessment showed:
 - 100% of the sourced volume is traceable to the mill.
 - 100% of the mills in our supply chain are satellite monitored against deforestation, representing 15 million hectares.
 - 100% of direct suppliers are committed to our Human Rights Policy and our Policy to Protect Forests, Biodiversity and Communities.
 - 97.1% of the sourced volume comes from companies that conduct human rights due diligence.
 - 99.7% of the sourced volume comes from companies with a public grievance log that includes human rights.
- We continue to participate as an active member in the No Deforestation, No Expansion on Peat and No Exploitation (NDPE) Implementation Reporting Framework (IRF) to drive progress on reporting against NDPE criteria. We also recognize the Indonesian Sustainable Palm Oil (ISPO) / Malaysian Sustainable Palm Oil (MSPO) as a regulatory framework and as an entry point to the NDPE IRF framework:
 - 100% of the sourced volume comes from companies that have a public No Deforestation, No Peat and No Exploitation Policy in place.
 - 99.4% of the sourced volume comes from companies that report volumes through the NDPE IRF or are committed to it.
- ADM is a member of the Roundtable on Sustainable Palm Oil (RSPO). RSPO is an international organization that develops global certification standards for sustainable palm oil based upon an exacting set of criteria, including the fair treatment of workers. As market demand drives the volume of certified products, we remain committed to continuously evaluating our product offerings to meet the demand for RSPO-certified products.

C. Transportation

- ADM Trucking in North America partnered with TAT (Truckers against Trafficking) to promote awareness and advocacy for the prevention of human trafficking – or modern-day slavery. The transportation industry is strategically positioned to identify and report to local authorities cases of human trafficking. In 2024, ADM Trucking educated 375 employees on human trafficking prevention, awareness and reporting.
- ADM supports ‘Territorial Coalizão Pará’, a project led by Childhood Brazil, which aims to systematically prevent and combat the sexual exploitation of children and adolescents in the multi-modal supply chain nodes in Northern of Brazil.

D. ADM’s Processing Facilities

Several ADM facilities are registered on Supplier Ethical Data Exchange (Sedex) and regularly undergo third-party Sedex audits. The human rights portion of these audits includes assessment 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. At the ADM facilities audited, there have never been findings of human trafficking.

Furthermore, in 2024, ADM initiated an internal review to assess whether a rehabilitation program supported by one of our facilities aligned fully with the guidelines recommended by the International Labour Organization (ILO) for engaging voluntary prison labor. The program was intended to support individuals nearing the end of their sentences by offering opportunities to develop skills and gain work experience to help ease their transition post-incarceration.

While all participants received the same training, safety equipment, and pay as other employees, ADM was unable to confirm that every aspect of the program met the full scope of ILO-recommended standards. In line with our commitment to upholding our human rights policy, we made the decision to start the phasing out our participation in the program.

E. Supplier’s Facilities

ADM is connected to over a thousand of direct suppliers on Sedex. The platform allows ADM to continuously monitor the progress of our suppliers on responsible sourcing audits and self-assessment questionnaires (SAQ), which provides visibility into our supply chain’s compliance with labor standards, health & safety, environment and business ethics best practices and insight into potential risks and improvement areas.



VI. 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.

B. 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.

C. 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 operations or supply chains. 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 [ADM Way 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](#).

D. Other Engagement

We actively engage with our smallholder farmers in capacity building efforts throughout our value chain. These programs 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 any loss of income to vulnerable families as a result of our actions. For more information on our broader sustainability efforts, please visit our [sustainability website](#).

E. Remediation

ADM engages with its stakeholders on an ongoing basis to monitor for forced or child labor 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.



VII. Attestation

This report constitutes ADM's disclosures pursuant to the Acts for the financial year ending December 31, 2024.

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, Chief Legal Officer
May 9, 2025