



Human Rights Policy

ADM's purpose is to unlock the power of nature, to enrich the quality of life. As a global leader in human and animal nutrition and the world's premier agricultural origination and processing company, we work collaboratively with stakeholders to improve working, environmental and safety conditions in our operations and supply chains.

We commit to protect and respect the human rights of our employees, those within our value chain, and in the communities in which we operate. We strive to promote human rights in accordance with the UN Guiding Principles on Business and Human Rights' three pillars:

- Commit and Embed: Safeguard human rights through appropriate policies and implementation programs
- Conduct Human Rights Due Diligence: "Know and show" human rights impacts, and take steps to mitigate and eliminate negative impacts or human rights risks
- Remedy: Ensure access to remedy through judicial and nonjudicial means.

Commit and Embed

Scope

This policy applies to all employees, officers, directors, contract workers and agents of ADM, our divisions and our affiliates in all countries. In addition, ADM expects that our direct and indirect suppliers, business partners, agents and consultants uphold these principles.

ADM is committed to the protection of Human Rights Defenders, whistle-blowers, complainants, and community spokespersons, including those defined in the [RSPO Human Rights Defenders Policy](#).

Governance

This policy has been reviewed by the company's Sustainability & Corporate Responsibility Committee of the Board of Directors and has been authorized by Juan Luciano, Chair and Chief Executive Officer. It is in effect as of May 5, 2021 until superseded by a new version.

The implementation of this policy is the responsibility of the ADM Sustainability team led by its Chief Sustainability Officer (CSO). The CSO provides sustainability updates to the Board of Directors at each quarterly meeting. The Sustainability & Corporate Responsibility Committee has direct oversight responsibility of the objectives, goals, strategies, risks and activities of the company related to sustainability, including its human rights program and reviews progress and updates on a quarterly basis. The CSO is supported by regional sustainability teams in North America, South America, and EMEAI.

In addition to the sustainability team, the compliance team has responsibility for the ADMWay Helpline that serves as an internal and external grievance mechanisms for our employees and interested stakeholders. The compliance team also tracks and ensures all employees complete annual compliance training and maintains the ADM Supplier Expectations Guidelines. The ADM Enterprise Risk Management (ERM) Team conducts quarterly reviews of all sustainability risks, including human rights risks.

Training and Awareness

Employees – This policy will be communicated to employees through internal channels such as compliance training (completion of which is tied to remuneration and tracked on a global basis), workplace postings and ADM's intranet. 100% of employees will receive human rights training in 2021 as a part of annual compliance training.

Suppliers – This policy will be communicated to suppliers through direct communication, posting in areas that are visible to suppliers, and inclusion in supplier contracts and/or incorporation via ADM's [Supplier Expectations](#).

Non-Compliances

All ADM colleagues are expected to adhere to these commitments. All allegations of violation will be investigated. Violations may lead to disciplinary action, up to and including termination of employment. When appropriate, ADM may also refer cases to government authorities.

Upon discovery of any supplier, contractor, or business partner that does not adhere to these commitments or that misrepresents the conditions under which crops, goods or services have been produced, ADM will take appropriate action. We expect participation in investigations of violations and disclosure of actions to remedy the situation. If the party does not demonstrate a good-faith effort to address issues in a timely manner, actions may include exclusion from new direct contracts and/or termination of relationship.

Human Rights Due Diligence

We recognize the role engagement plays in preventing, addressing, and remedying human rights concerns. Where applicable, we strive to engage with employees, communities, civil society and other stakeholders to address risks along our value chain.

We work throughout our operations to implement and enforce programs that aim to respect the following key human rights, and we expect others in our value chain to uphold these criteria, encourage them to adopt similar policies, and will work to develop and strengthen relationships with contractors and suppliers who do so.

Freedom of Association and Collective Bargaining – We respect employees' right to join, form or not to join a labor union without fear of reprisal, intimidation, or harassment. Where employees are represented by a legally recognized union, we support establishing a constructive dialogue with their freely chosen representatives. We are committed to bargaining in good faith with such representatives of our employees, and expect our suppliers to do the same.

Forced or Compulsory Labor – We prohibit 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 – We prohibit 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 – We prohibit 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 expect our suppliers and business partners to implement the same practices.

Diversity and Inclusion – We strive to ensure that our workplace is one of inclusion and acceptance. The diversity of our individual backgrounds, experiences and ways of thinking is an important driver in ADM's success. We must therefore value the diversity of every member of our team and encourage the same of our suppliers.

Safe and Healthy Working Conditions – We will provide a safe and healthy working environment and comply with applicable health and safety laws and regulations. We will maintain systems and procedures designed to keep workers safe and protect them from occupational hazards, harassment and abuse. We expect our suppliers to do the same.

Working Hours, Wages and Benefits – All employees in our operations and supply chain will be compensated in

accordance with all applicable local laws and regulations including those related to minimum wage and overtime pay. Working hours must be in line with legal requirements and any collective bargaining agreements applicable to the location.

Land Rights – We respect land-tenure right and the rights of indigenous and local communities to give or withhold their free, prior and informed consent (FPIC) to operations on lands to which they hold legal or customary rights. We expect all suppliers to uphold the principles of FPIC in their operations and business dealings.

Water – We respect the right to access safe and clean drinking water and sanitation in our operations and supply chain.

Take Action

ADM conducts social compliance audits throughout our operations to verify compliance with our policies. Audit frequency is based on facility size, number of employees, geography, and number/severity of findings from previous audits. Findings and observations are reviewed with the facility and with sustainability team to ensure all issues are addressed.

Implementation of this policy in our supply chains will be prioritized based on risk assessment. To accommodate supply chain complexities and regional variations, implementation and verification activities may be adjusted to address the different commodities and/or specific regional characteristics where we do direct and indirect sourcing. Implementation in each supply chain will be organized in the following areas:

- **Assessing Impacts:** Available systems and sourcing procedures in every region will be assessed to understand potential risks throughout the supply chain. We will maintain traceability for high risk commodities and geographies that enables the identification of crop sourced to the lowest possible unit.
- **Integrating Findings:** Effective communication and engagement with suppliers is fundamental to ensure they clearly understand our commitments, and, together, help us create more sustainable supply chains. We require our suppliers to operate their businesses ethically—including land acquisition and land use—within all applicable laws and regulations, and to uphold our commitments.
- **Tracking Performance:** Regional and supply chain based monitoring procedures will be established and updated to verify supplier compliance with this policy. We acknowledge that transparent and periodic communication is an effective way of publicly demonstrating progress in our journey. To support transparency in the supply chain, ADM will regularly publish reports outlining implementation and results of this policy at www.adm.com/ProgressTracker.

Remedy

- Stakeholders, including ADM employees, supply chain workers, and community members, who have issues or concerns related to the implementation of our policies are encouraged to contact the ADM Way Helpline at www.TheADMWayHelpline.com. Where local law permits, concerns can be reported anonymously. Phone numbers for specific geographies are listed on the website.
- All complaints will be responsibly managed using a transparent grievance procedure. All allegations brought forward will be reviewed and addressed in line with our [Grievances and Resolutions mechanism](#).
- An [updated log](#) of issues and resolutions will be maintained and made publicly available through our website.

Related ADM Policies and Adherence with International Standards

Internal – These additional policies support and complement this policy:

- [ADM Code of Conduct](#)
- [ADM No-Deforestation Policy \(TO BE UPDATED\)](#)
- [ADM Supplier Expectation Guidelines](#)

External – This policy is in accordance with company values and these external publications:

- [Fundamental Principles and Rights at Work of the International Labour Organization \(ILO\)](#)
- [ILO Multinational Enterprises \(MNE\) Declaration](#)
- [United Nations \(UN\) Universal Declaration of Human Rights](#)
- [UN Guiding Principles on Business and Human Rights](#)
- [UN General Assembly Resolution A/RES/64/292 – The human right to water and sanitation](#)

3.0 Revision History

Version	Date Published	Description of Change(s)
1.0	2014	N/A - Initial publication
2.0	09/15/17	Updated format, added definitions and references sections, updated standard language, added right to water and sanitation.
3.0	05/05/21	Updated format, wording, hyperlinks, references. Inclusion of customary land use rights, alignment with UNGP framework.