



ADM's Commitment to Protecting **Forests, Biodiversity and Communities**

2025 Palm Progress Report



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Introduction

Since ADM committed to No Deforestation, No Peat, and No Exploitation (NDPE) in March 2015, ADM has been continuously reinforcing its commitment with actions and engagements, especially for the palm supply chain. Palm generates revenue for millions of farmers, mostly located in Southeast Asia. ADM's sourcing requirements are defined in ADM's [Human Rights Policy](#) and [Policy to Protect Forests, Biodiversity and Communities](#).

In 2024, ADM continued to advance its commitment to responsible palm sourcing, delivering volumes aligned with its sustainability commitments and goals.

As a company that does not own plantations or mills, ADM's influence is exercised through robust engagement with suppliers and stakeholders across the value chain. Our longstanding commitment to no deforestation, no peat-development, and no exploitation in the palm supply chain remains a cornerstone of our strategy implemented through 4 pillars.

This report highlights key milestones achieved with volumes from 2024, reflecting progress in delivering traceable, responsibly sourced volumes according to the 4 pillars of ADM's palm sourcing strategy:

- Supply chain traceability
- Supplier Engagement
- Monitoring and verification
- Reporting

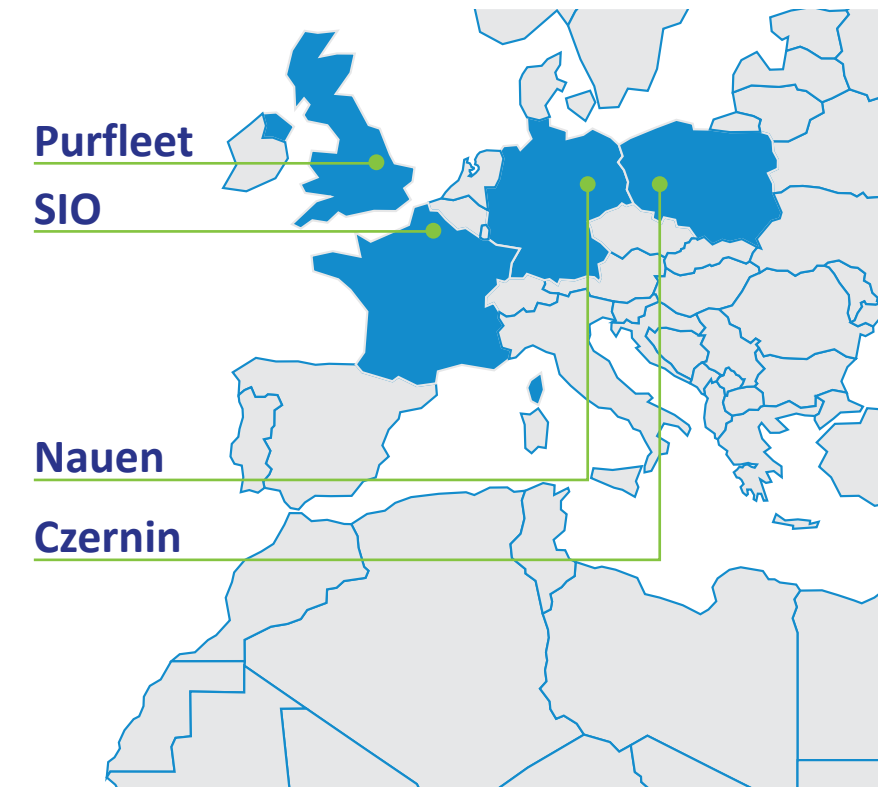
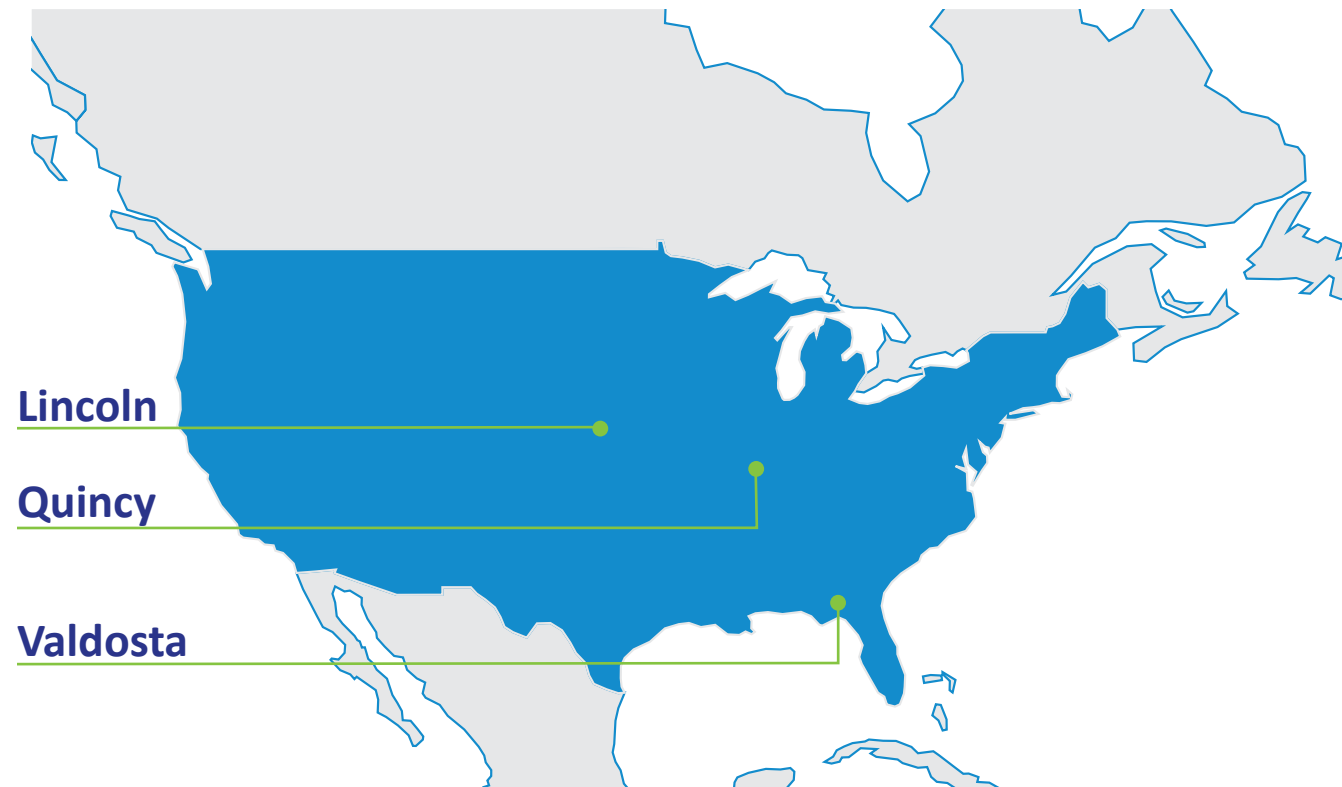
This report covers Crude Palm Oil (CPO) and Palm Kernel Oil (PKO) volumes processed by ADM facilities and includes the achievement of palm-related ambitions set by the Agriculture Sector Roadmap to 1.5°C. More information can be found on ADM's [website](#).

In addition to NDPE progress, ADM has continued to implement the other pillars of its Palm Responsible Sourcing Program, in line with the priorities outlined in our [2024–2025 Action Plan](#).



ADM Palm Oil Refineries

● ADM Refineries



Our Palm Sustainability Journey

ADM joins RSPO

2007

2015

ADM commits to No Deforestation for soy and palm supply chain

ADM joins the Palm Oil Collaboration Group (POCG)

2020

ADM implements a non-compliant supplier process

2021

ADM supports landscape and smallholder transformation projects in Sabah and Aceh

The palm sector releases the Agriculture Sector Roadmap to 1.5°C

2022

ADM publishes verified NDPE Implementation Reporting Framework (IRF) profiles

ADM develops new partnership in Riau

2023

ADM revises and updates Policy to Protect Forests, Biodiversity and Communities.

ADM completes of palm-related targets in Agriculture Sector Roadmap to 1.5°C

2025



From Policy to Practice: Driving Sustainability and Transparency in ADM's Palm Oil Supply Chain

At ADM, we are committed to building a sustainable and transparent oil palm supply chain. Although ADM does not own plantations or mills and only sources palm products from third-party suppliers, we strive to achieve the highest standards of environmental and social responsibility across all aspects of our operations, encourage our direct and indirect suppliers* to adopt the same standards while supporting smallholders. ADM Supplier Expectations outline that all ADM suppliers are expected to adhere to ADM's sustainability policies, including core principles of the [Human Rights Policy](#) and the [Policy to Protect Forests, Biodiversity and Communities](#).

ADM's Policy to Protect Forests, Biodiversity and Communities (originally released in 2015 and updated in 2021 and 2023) sets requirements for a robust NDPE commitment. This policy applies to ADM's own operations and across all supply chains in which ADM operates, including all supplier tiers back to the origin from where commodities are sourced and covers all palm products, including CPO, PKO, and other derivatives: Suppliers are expected to comply with ADM Supplier Expectations, including by communicating our NDPE expectations to their own suppliers and maintaining traceability of their supply chains, ADM policies are complemented by [ADM's Palm Action Plan 2024-2025](#) and is overseen by senior leadership with clear accountability mechanisms embedded throughout the supply chain.

ADM's Palm progress report enables transparent reporting on traceability to both mills and plantations.

ADM enforces a strict deforestation cut-off date of December 2015, meaning that any palm oil sourced from land deforested after this date cannot be considered deforestation-free. Through satellite monitoring, ADM actively monitors and requires protection of High Conservation Value* (HCV) and High Carbon Stock* (HCS) areas. We expect our direct suppliers to adhere to ADM policies and follow supplier expectations. ADM supports suppliers through capacity building and training, and supports communities with participation in landscape projects, ensuring that sustainability practices are effectively implemented on the ground.

* as defined in ADM Policy to Protect Forests, Biodiversity and Communities.

As a requirement of sustainability standards, we promote integrated pest management and the responsible use of agrochemicals, banning most controversial chemicals. ADM also expects its suppliers to implement comprehensive pesticide, water and waste management systems across all operations to minimize environmental impact.

ADM's commitment to the Agriculture Sector Roadmap to 1.5°C has acted as catalyst for efforts from ADM and its suppliers towards a more responsible palm oil supply chain. ADM has been actively participating in the sectoral roadmap's development as well as implementation by participating in industry working groups like Palm Oil Collaboration Group (POCG) or Roundtable for Sustainable Palm Oil (RSPO).

ADM upholds a dedicated [Human Rights Policy](#) aligned with the UN Guiding Principles on Business and Human Rights, and suppliers are required to comply with [ADM supplier expectations](#). We are committed to:

- Respecting the rights of workers, indigenous peoples, and local communities
- Protecting Human Rights Defenders
- Providing accessible grievance mechanisms

Transparency is central to our approach. In addition to ADM's [annual sustainability report](#), ADM maintains a public [grievance log](#), and reports to global platforms such as [CDP](#), or palm-specific platforms such as [Annual Communication On Progress \(ACOP\)](#) and [Sustainable Palm Oil Transparency Toolkit \(SPOTT\)](#).



Agriculture Sector Roadmap to 1.5°C

Agri-commodity companies are essential to executing the shift to a more sustainable future. Acknowledging their importance, 13 of the world's major agricultural commodities companies issued a joint declaration during COP26, agreeing to build a unified roadmap for greater supply chain action, consistent with the 1.5°C path. In 2025, we achieved an important milestone, closing the roadmap and reporting on ADM achievements.

[Agriculture Sector Roadmap to 1.5°C \(tropicalforestalliance.org\)](https://tropicalforestalliance.org)

Pillar 1



Accelerate supply chain action to reduce emissions from land use change

All palm oil volumes are in the “Delivering” category of the NDPE IRF (Implementation Reporting Framework) by 2025

The NDPE Implementation Reporting Framework (IRF) was created by the POCG and is a common tool that helps palm oil companies track and report progress on their NDPE goals. It shows how much of their supply meets these standards, highlights where improvements are needed and provides a common language when it comes to NDPE progress.

Volumes are categorized as “Delivering” only if the upstream suppliers demonstrate they have required actions in place to deliver on NDPE commitments
see: [NDPE-IRF Website](#)

2024 Updates

ADM is close to sourcing 100% of its palm oil volumes in the “Delivering” category of the NDPE IRF methodology:

Among all CPO volumes sourced by ADM refineries in 2024, IRF-Delivering volumes represented 99.3%

Among all PKO volumes sourced by ADM refineries in 2024, IRF-Delivering volumes represented 96.4%

[Verification statement is available online](#), section Global Palm.

Sources

Pages 14, 18 and 19 of this report
Individual profiles of ADM palm-refineries are available [online](#) and verified by Control Union.

Pillar 2



Drive transformation of commodity producing landscapes

Scaling-up forest positive action for production and forest protection in priority landscapes through proactive interventions.

This approach encourages companies to go beyond their own supply chains and work together in key regions to support sustainable palm oil production, protect forests, and improve local livelihoods to create a long-term, systemic change.

2024 Updates

ADM maintained its contribution to landscape projects in priority areas:

- Aceh
- Riau
- North Sumatra
- Sabah

Sources

- Page 15, 16

Pillar 3



Support forest positive sector transformation

Support the uptake of the mandatory regulatory frameworks in Indonesia and Malaysia, so that the last-mile transformation can be achieved.

This aims to link the sector's no-deforestation commitment to the producer countries' own sustainability and climate policies such as Indonesia's ISPO (Indonesian Sustainable Palm Oil) and Malaysia's MSPO (Malaysian Sustainable Palm Oil).

2024 Updates

ADM is participating in the Palm Oil Collaboration Group engaging on the IRF methodology, and is regularly contributing to consultations organized by Roundtable for Sustainable Palm Oil (RSPO). Those working groups actively monitor local frameworks' evolution and encourage adoption of ISPO and MSPO standards.

Sources

- Page 5, 6, 10, 18 and 19 of this report

Our 2025 Goals for Responsible Palm Sourcing



Supply Chain Traceability

- Maintain high level of traceability to palm oil mill (TTM)
- Increase traceability to palm plantation (TTP)



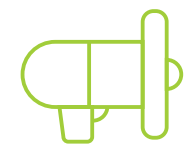
Monitoring & Verification

- 100% of palm volumes in the IRF “Delivering” category for deforestation
- Monitor and verify suppliers to achieve responsible sourcing of palm oil.



Supplier Engagement

- 100% of palm volumes sourced from direct suppliers who have a responsible sourcing palm program
- Engage 100% of our direct palm suppliers in ADM human rights due diligence process
- Invest in Landscape transformation projects



Reporting

- ADM Palm Responsible sourcing progress report
- Regularly update grievance log and review the grievance process



See ADM's [2024- 2025 Palm Oil Action Plan](#)

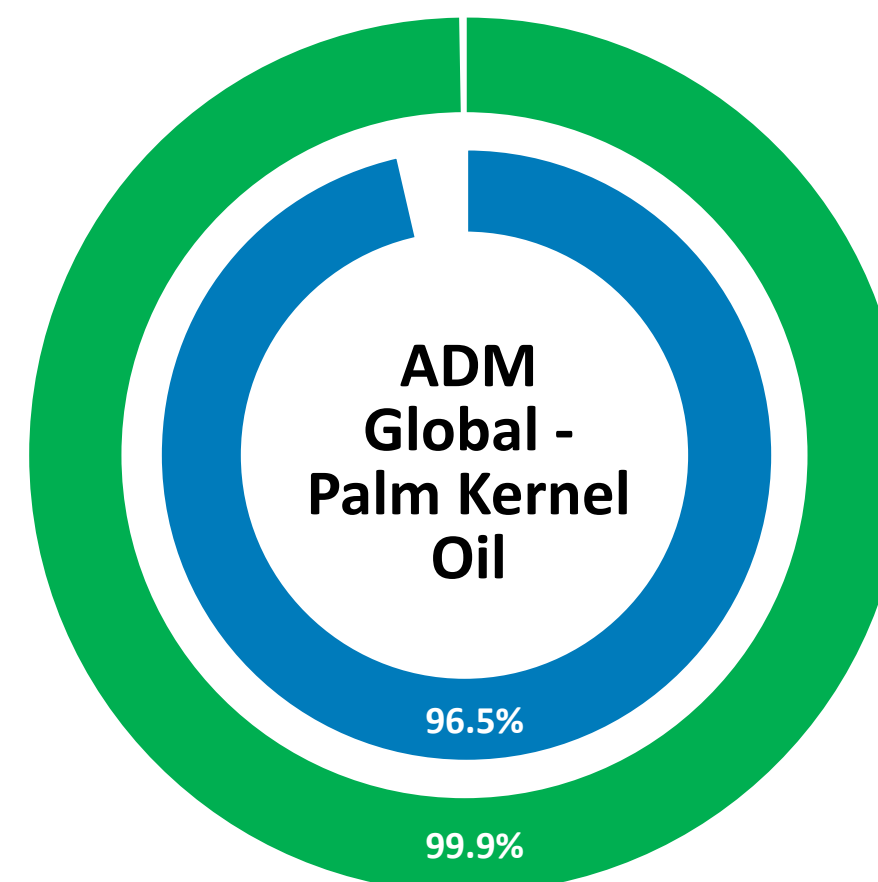
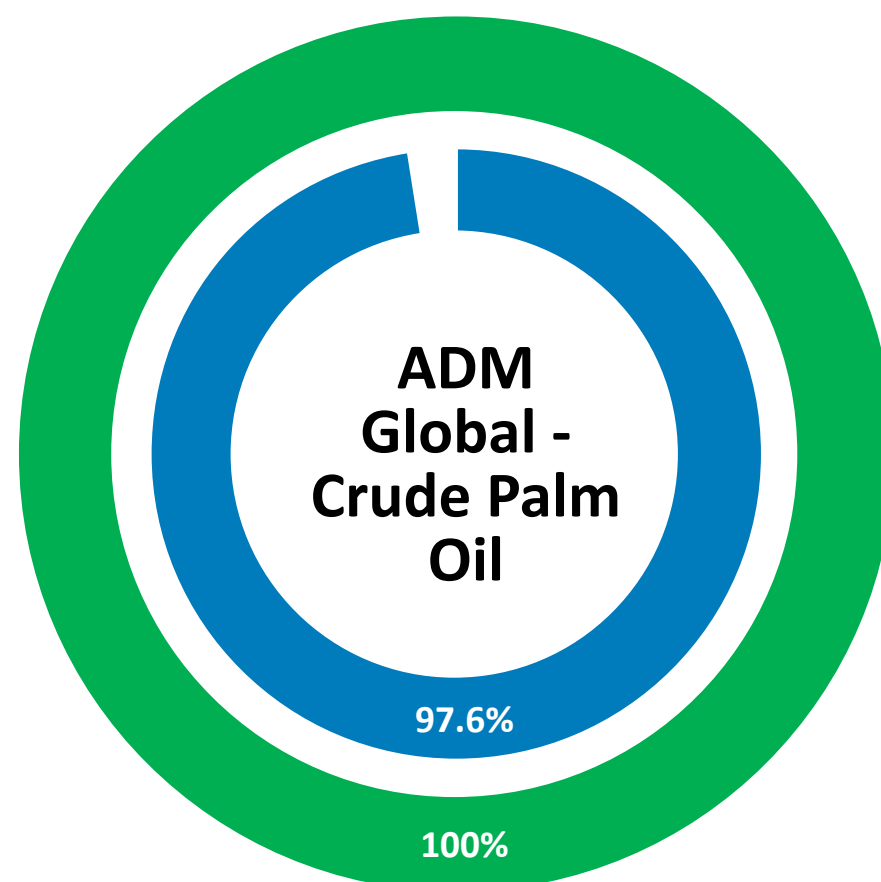


Supply Chain Traceability

ADM maintained its collaboration with direct suppliers and collected palm traceability information to the mill (TTM) and to the plantation (TTP). This year again, Control Union, an independent third party, verified the reliability of the ADM-internal traceability protocol and accuracy of data collected. For each of its palm refineries, ADM publishes on its [website](#) the mill list, list of direct suppliers, traceability percentage (TTM and TTP), NDPE IRF profile of the site and Control Union's verification statement.

Traceability to the plantation means being able to identify the exact farm or location where the palm fruit was originally produced.

Traceability to the mill means being able to identify the specific palm oil mill where the oil palm fruit was processed after harvest.



* Reporting period of 2024

● Traceable to Mill

● Traceable to Plantation



To ensure responsible sourcing and visibility, ADM maintains detailed traceability of its palm supply chain. Mills information for each supplying mill goes through a palm risk assessment relying on the Forest Change analysis tool by Global Forest Watch Pro. This assessment illustrates the risk that palm oil mills are associated with deforestation and indicates priorities for ADM in its future supplier engagement.

All direct suppliers fulfill ADM standard requirements for traceability and share their mills lists with ADM.

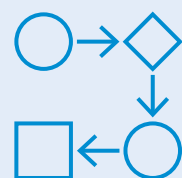
For CPO and PKO processed and traded by ADM:



52 Direct suppliers



Origination from
21 countries



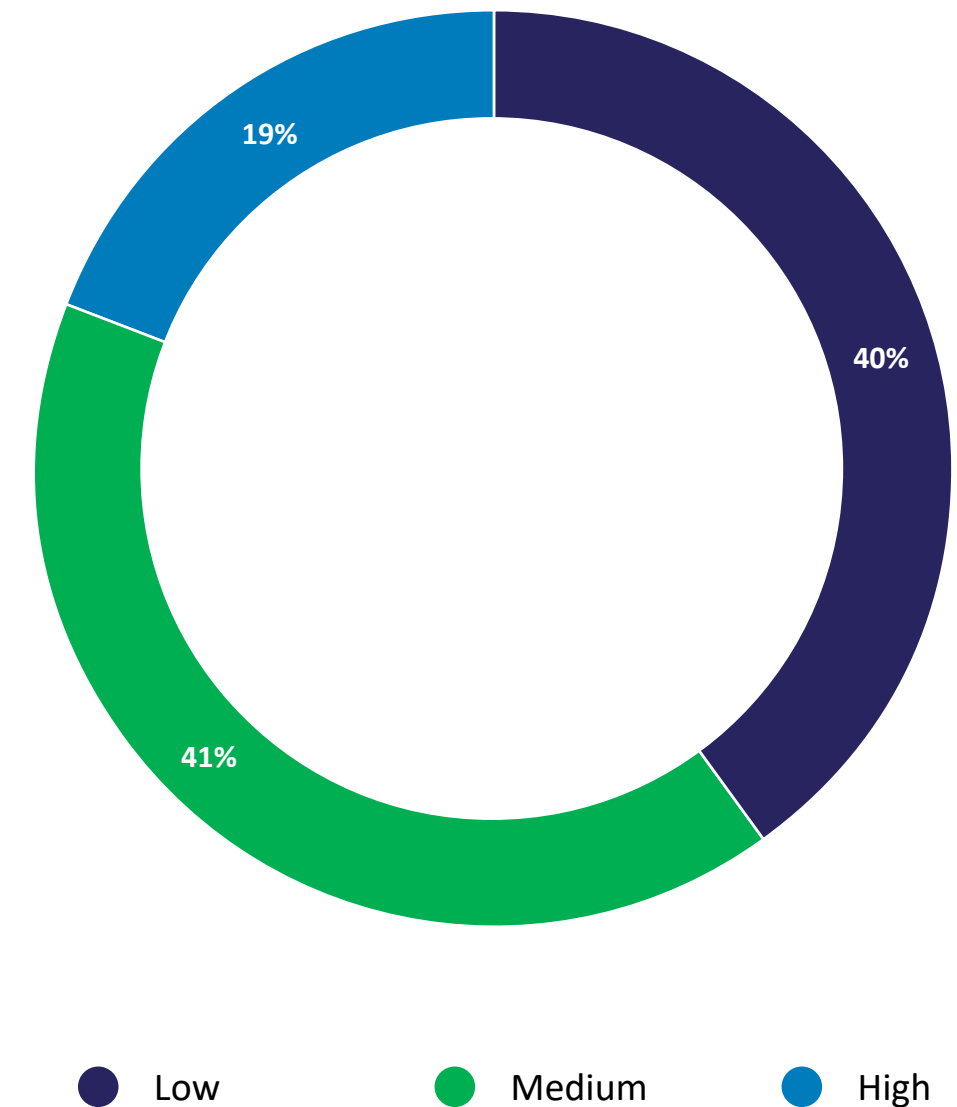
1800+ Indirect Mills



Traceability data verified
by third- party

Percentage of Mills by Forest-Related Risk Level

Results from Global Forest Watch Pro Palm Risk Analysis Tool for reporting 2024 (conducted annually)

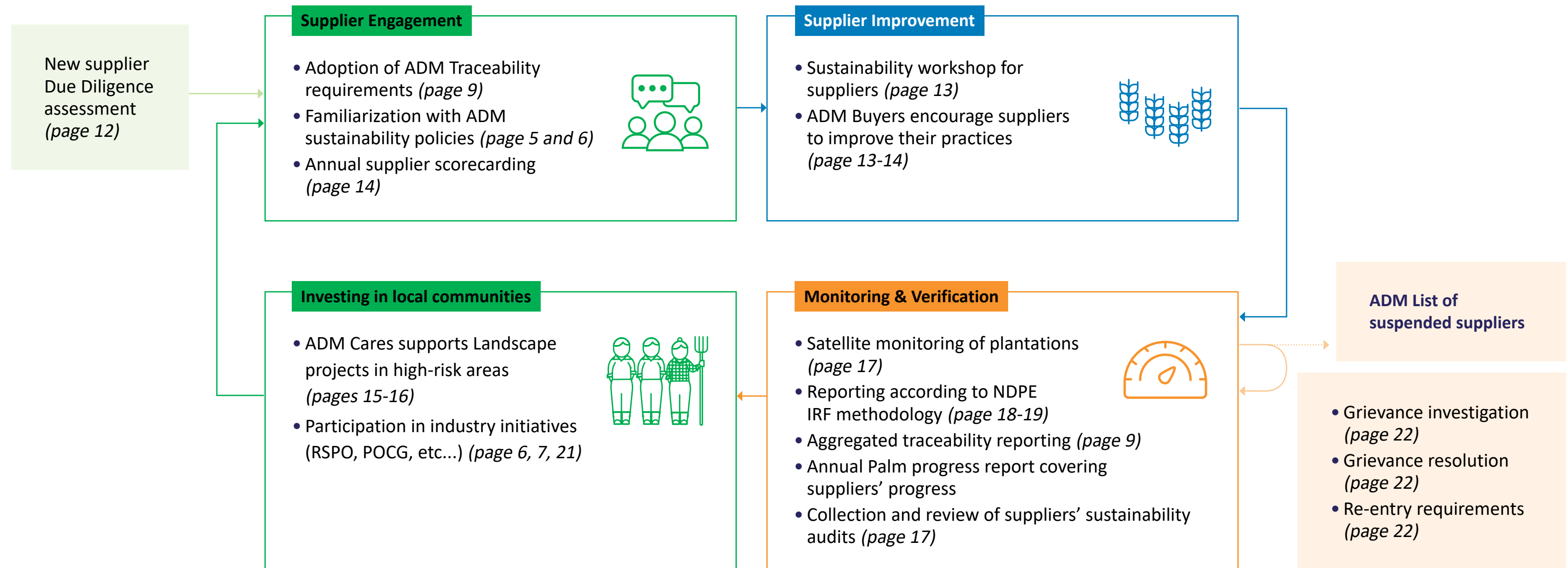


* Reporting period of 2024



Supplier Engagement

ADM Actions for Engagement Throughout the Palm Supply Chain



ADM Supply Chain Due Diligence program for potential new suppliers

ADM is committed to maintaining high standards of integrity across its palm supply chain. Potential new suppliers are vetted through our due diligence process, with support from a third party to evaluate their progress toward:

- Environmental protection and human rights policy commitments & timebound implementation plan.
- Traceability To Mill (TTM), To Plantation (TTP), mill list disclosure
- Supplier engagement and management
- Inclusion of smallholders in the supply chain
- Human rights and environmental risk assessment and monitoring,
- Deforestation monitoring and verified deforestation-free methodology (VDF)
- Landscape and sectoral engagement high-risk area
- Participation in industry initiatives (e.g. POCG, RSPO)
- Grievance procedure and grievance log
- Monitoring effectiveness and progress reporting



Training On Sustainability Topics and Engagement with Current Suppliers

ADM conducts an annual scorecard assessment of all its Tier 1 palm suppliers for traded and refined volumes. This scorecard evaluates direct suppliers' performances across key sustainability criteria such as policies, traceability, supply chain, monitoring mechanism, landscape and sectoral engagement, grievance management, transparency & reporting, and NDPE IRF score.

Based on these assessments, ADM engages suppliers through tailored action plans to promote the adoption of best sustainability practices. Additionally, ADM supports supplier development by organizing workshops on sustainability topics, most recently focusing on education around the EU Deforestation Regulation (EUDR).



For Crude Palm Oil and Palm Kernel Oil delivered to ADM facilities:



Policy Commitment

100%

of volumes are sourced from direct suppliers that have public NDPE Policy in place

100%

of volumes are sourced from direct suppliers whose policy includes verifiable time-bound targets and milestones.

All these companies publicly report progress against their timebound implementation plan.



Human Rights Protection

100%

of volumes are sourced from direct suppliers that conduct human rights due diligence

100%

of volumes are sourced from direct suppliers having public grievance log



No Deforestation

100%

of volumes are sourced from direct suppliers that conduct deforestation monitoring

100%

of volumes are sourced from direct suppliers that conduct supplier engagement and awareness-raising programs

100%

of volumes are sourced from direct suppliers that directly support landscape and on-the-ground programs in priority production landscapes



NDPE IRF

100%

of volumes are sourced from direct suppliers that report volumes through the NDPE IRF or are committed to it

100%

of volumes are sourced from direct suppliers with NDPE IRF Commitments, including 100% volumes in the “Delivering” category by 2025



Environmental Protection

100%

of volumes are sourced from direct suppliers that undertake environmental risk assessments of mills in their supply base

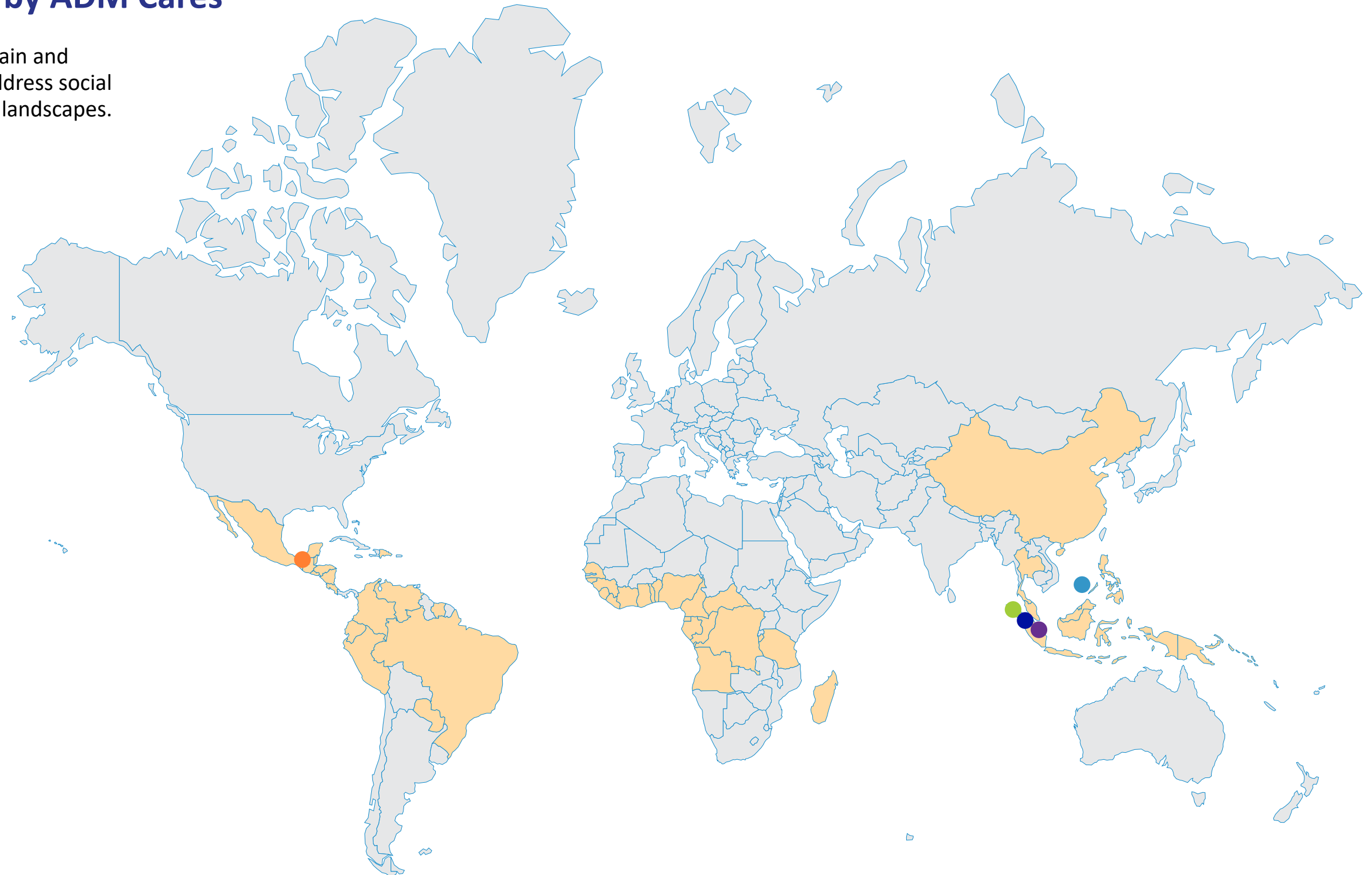
100%

of volumes are sourced from direct suppliers having public grievance log

Landscape Projects Supported by ADM Cares

ADM continues to enhance the palm oil supply chain and extend its innovative long-term partnerships to address social and environmental challenges in priority sourcing landscapes.

- Aceh Landscape Project – in progress
- Riau Project – in progress
- North Sumatra Project – in progress
- Sabah Landscape Project – in progress
- Mariposa Project – in progress
- Palm Producing countries



Zoom In: Riau Landscape Co-Funded Project

Thriving Communities Conducted by Tzu Chi Foundation and GAR

Empowering Rural Communities in Riau: ADM, GAR, and Tzu Chi Indonesia Deepen Commitment to Sustainable Growth

Since 2023, ADM, Golden Agri-Resources (GAR), and Tzu Chi Indonesia have been working together to uplift communities in Riau Province, Indonesia's largest palm-producing region. Their joint efforts aim to improve food security, early childhood education, and economic resilience across the palm oil supply chain.



Key Achievements (2023–2024)

The partnership successfully upgraded 100% of GAR's early childhood care centers (BPAs) in Riau with new educational books and learning kits by the end of 2024. Caregivers at 34 BPAs received specialized training in child safety, nutrition, and early development, with the support of Dharma Wanita volunteers : the spouses of GAR employees who actively support Tzu Chi initiatives. These volunteers also organized regular educational activities for children at the BPAs. As a result, 95% of parents expressed satisfaction with the improved caregiving and learning environments.

In parallel, Community Learning Centers (CLCs) trained over 450 local residents in sustainable agriculture, waste management, and business development. A total of 83 mentoring sessions, consultations, and field visits were conducted to support micro, small, and medium enterprises (MSMEs). 13 MSMEs in sectors such as food and beverage, agriculture, and waste management have flourished, indirectly benefiting more than 411 people in the local community. Each month, over 50 individuals, including business owners, family members, and workers, continue to benefit from these ongoing programs.

Looking Ahead

With the pilot phase completed, the partnership is expanding successful models across Riau Province. This long-term collaboration reflects a shared vision: to build stronger, self-reliant communities through sustainable agriculture, quality education, and inclusive economic growth.





Monitoring & Verification

Since 2022, ADM has partnered with an external consultant to reinforce its No Deforestation, No Peat, No Exploitation (NDPE) commitments. Leveraging advanced geospatial technology, supply chain intelligence, and local expertise, our independent service provider helps ADM ensure a transparent and accountable palm oil supply chain

100%

of direct suppliers are committed to ADM's Human Rights Policy and policy to Protect Forests, Biodiversity and Communities.

100%

of mills supplying volumes refined at ADM facilities are satellite monitored against deforestation, representing 15 millions hectares

Increasing number of palm suppliers sharing results of SEDEX SMETA responsible sourcing audits

Satellite Monitoring

High-resolution, near-real-time satellite alerts enable ADM to detect deforestation and peatland development at the plantation level, facilitating prompt and proactive risk mitigation. These alerts are highly accurate, as they rely on the most up-to-date and precise existing maps combined with comprehensive corporate intelligence databases.



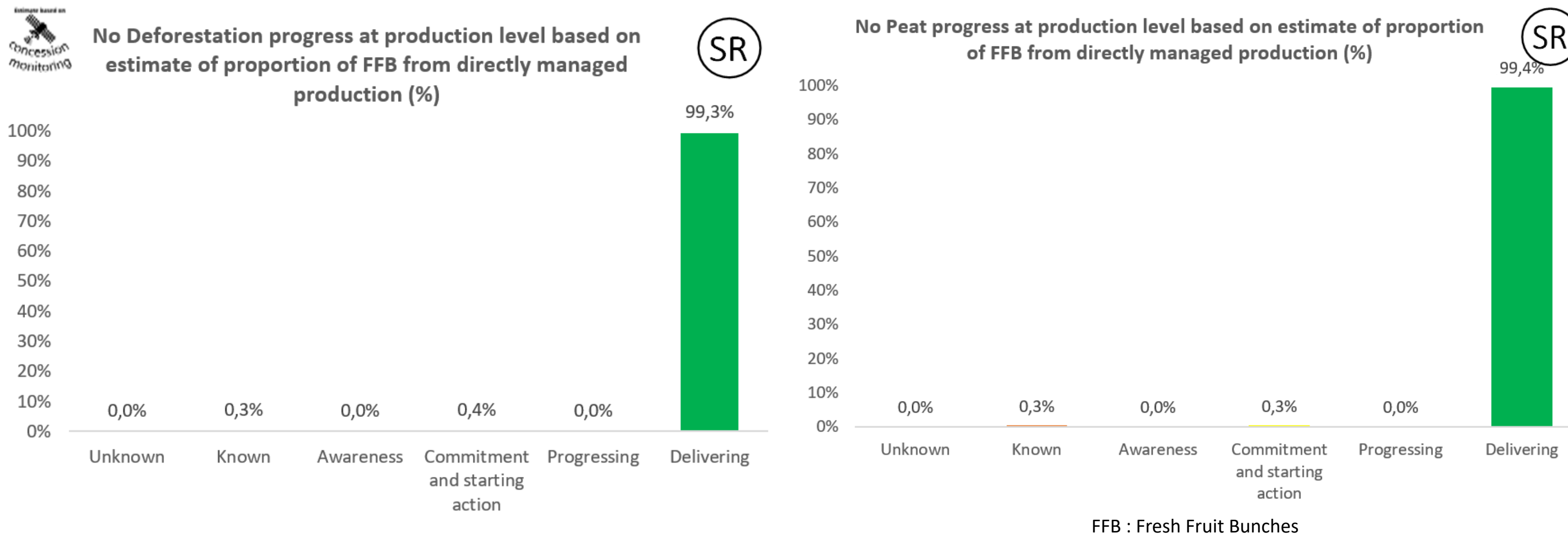
NDPE IRF Reporting – Crude Palm Oil

ADM continues to actively participate in the NDPE IRF Working Group to drive progress on reporting against NDPE criteria, including evolution of the IRF methodology towards IRF 6.0, which will provide improved accuracy. ADM has engaged with all its direct suppliers on the provision and improvement of their respective NDPE IRF profiles. As a result of mutual collaboration and engagement with its suppliers, ADM's NDPE IRF score in the delivering category achieved the target set by ADM's public commitment.

In June 2025, Control Union conducted the annual verification of all ADM's NDPE IRF facility profiles for volumes delivered to ADM facilities from January to December 2024. The audit was conducted in accordance with the NDPE Data Verification Protocol.

The NDPE IRF profiles per facility are available under the Palm Oil Supply Chain Traceability sections of [ADM's Sustainability Policies & Reports](#) webpage.

Aggregated NDPE IRF profile for all ADM CPO-refineries

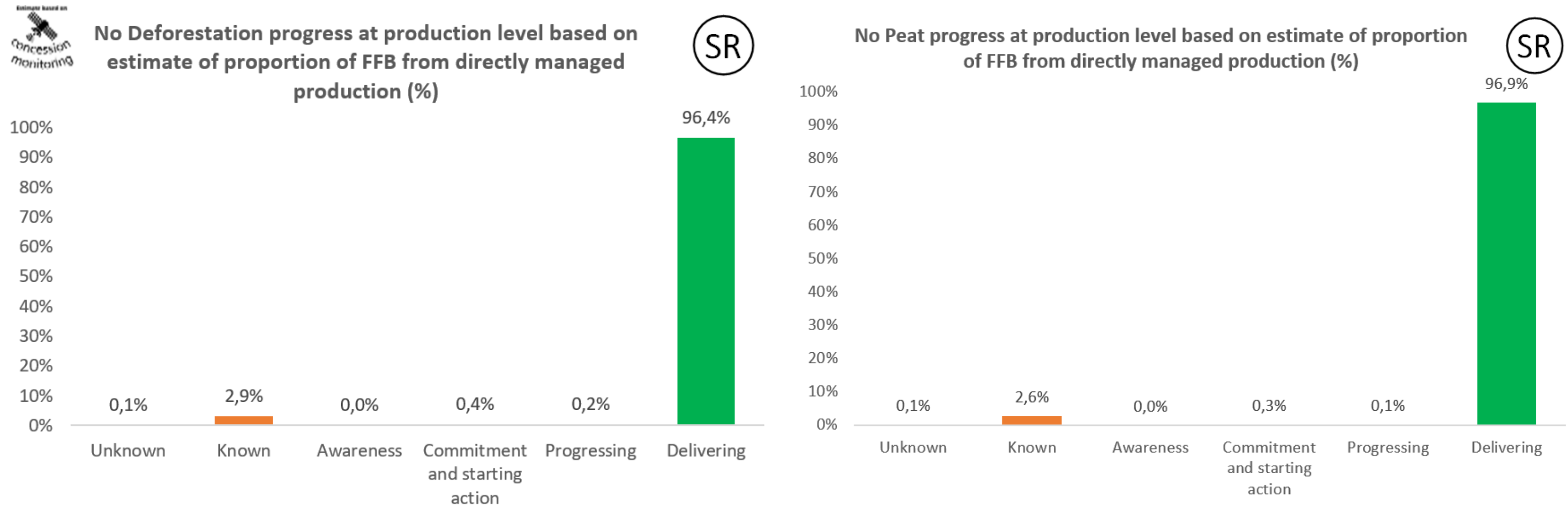


NDPE IRF Reporting – Palm Kernel Oil

In June 2025, Control Union conducted the annual verification of all ADM's NDPE IRF facility profiles for volumes delivered to ADM facilities from January to December 2024. The audit was conducted in accordance with the NDPE Data Verification Protocol.

The NDPE IRF profiles per facility are available under the Palm Oil Supply Chain Traceability sections of [ADM's Sustainability Policies & Reports](#) webpage.

Aggregated NDPE IRF profile for all ADM PKO-refineries

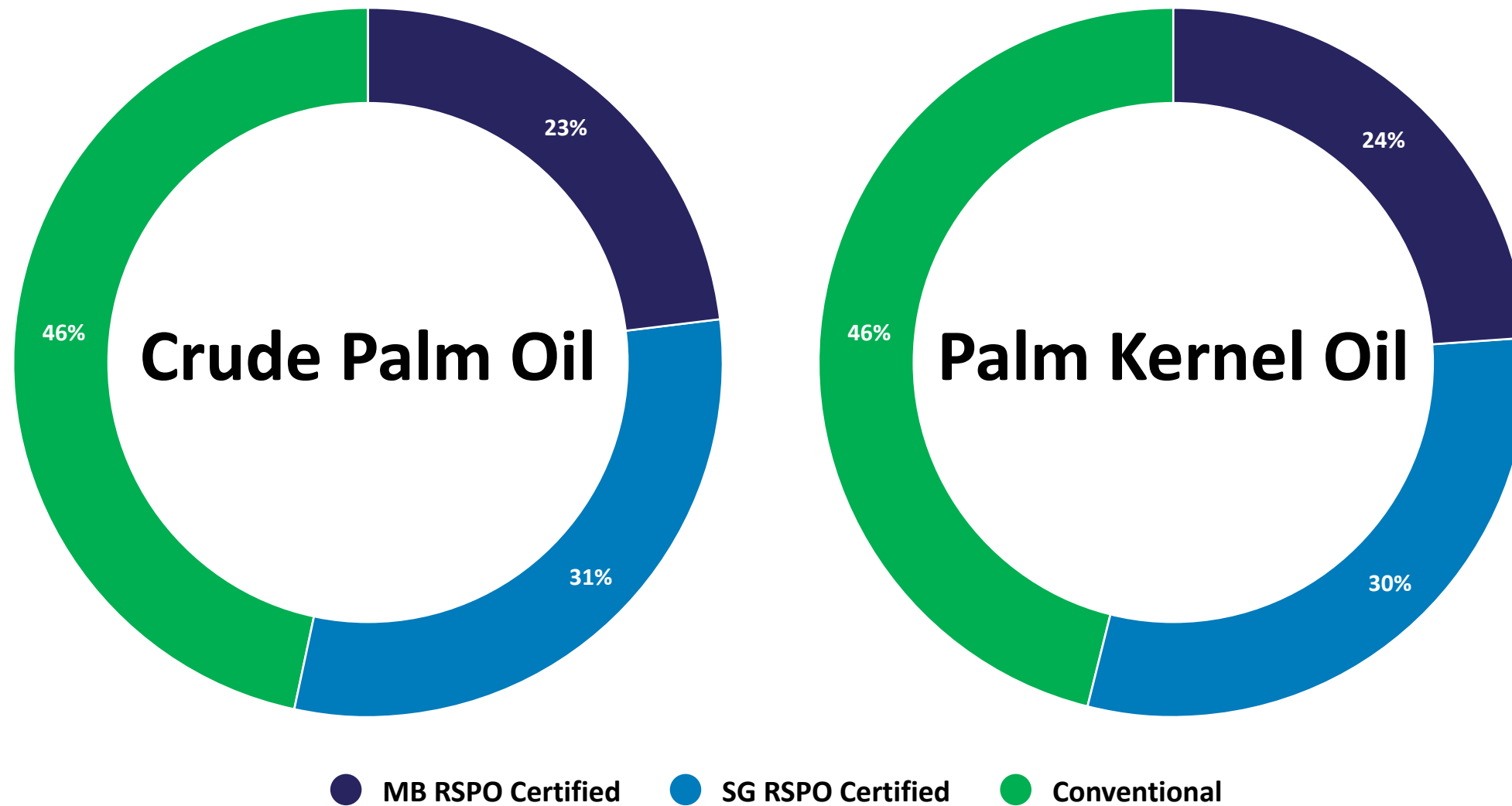


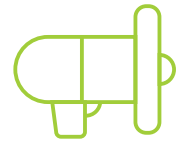
Roundtable on Sustainable Palm Oil (RSPO) -Certified volumes

Certified sustainable palm oil volumes are reported by tracking the volume of RSPO certified Crude Palm Oil (CPO) and Palm Kernel Oil (PKO) RSPO delivered to ADM in 2024. ADM responds to downstream demand by supplying RSPO-certified materials to meet market expectations.

Segregated (SG) RSPO palm oil comes only from certified farms and is kept separate from non-certified palm oil to ensure it stays fully traceable.

Mass Balance (MB) RSPO palm oil is a mix of certified and non-certified palm oil, but the amount of certified oil used is tracked to support sustainable sourcing.





Reporting

Grievance Management

In order to strengthen transparency in grievance management, ADM publicly publishes stakeholders' queries into a [grievance log](#), and is supported by an external consultant for the following components of ADM [Grievances and Resolutions protocol](#):

Grievance Investigations

Our consultant conducts spatial and historical analyses to verify third-party allegations and trace supply chain connections, as well as plantation ownership, ensuring grievances are managed in alignment with ADM's sustainability standards. Strategic guidance is also provided to support effective and timely responses.

Grievance Monitoring

Continuous updates on supplier progress and the implementation of corrective actions reinforce transparency and accountability across the supply chain. Inovasi Digital also provides dedicated support for the closure of grievance cases, ensuring that issues are resolved.

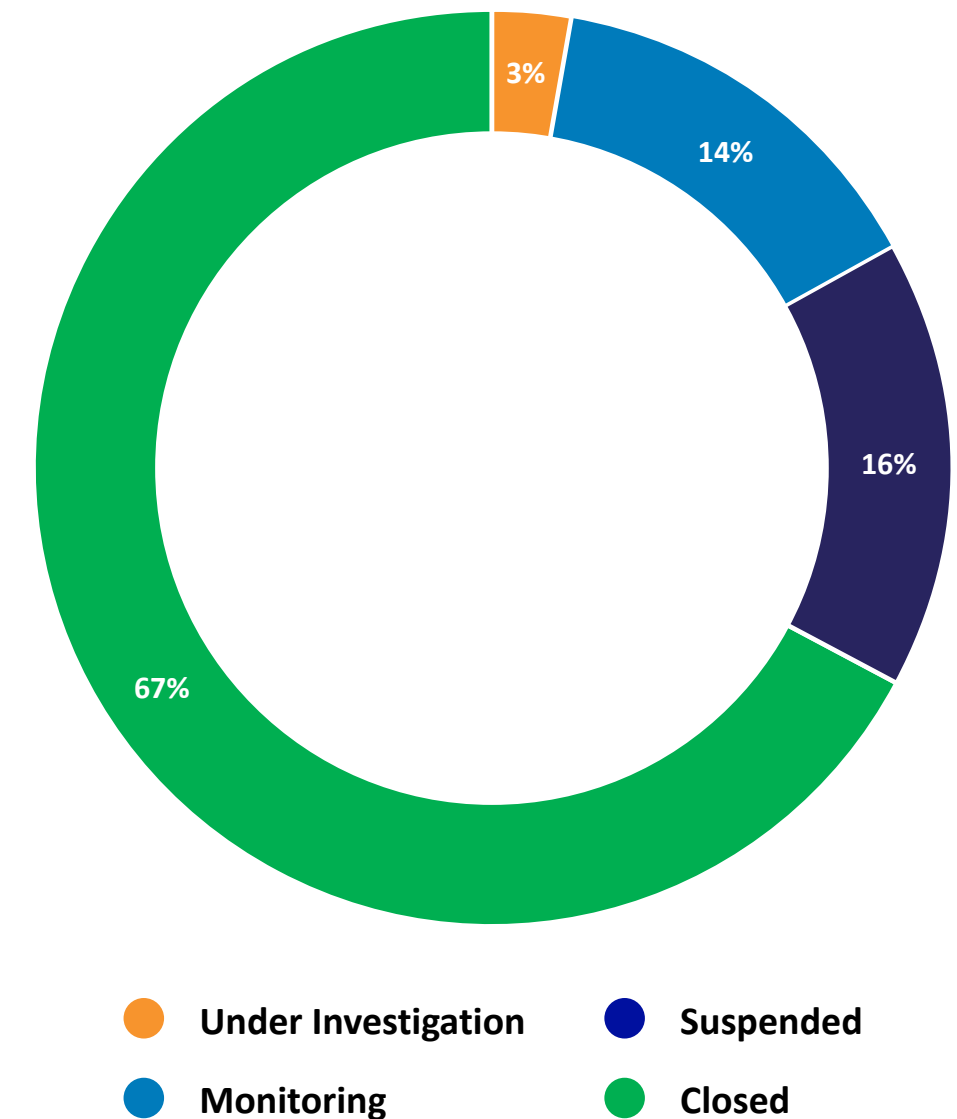
Suppliers re-entry support

Independent assessments are carried out to validate supplier compliance with ADM's re-entry and recovery protocols, ensuring rigorous standards are met before re-engagement.

All grievances submitted to ADM are investigated : If allegations are confirmed and occurred within ADM's supply chains, ADM will react according to its [Managing Supplier Non-Compliance procedure](#), and engage in resolution following the OECD FAO causal relationship framework.

ADM maintains an internal list of suspended suppliers, which it regularly updates and distributes to its purchasing team.

PERCENTAGE OF PALM-RELATED GRIEVANCE PER STATUS



Transparency Drives Changes

As ADM believes that palm supply chain transformation will be accelerated by greater transparency across actors, the company regularly publishes additional resources that contribute to a more reliable and transparent industry such as:

- [Public traceability reports including supplier lists](#) (see Palm Oil Supply Chain Traceability)
- [Non-compliance protocols and grievance logs clear sustainability policies](#) (see Sustainability Commitments and Policies) complemented by [2024 – 2025 Palm Oil Action Plan](#)
- [Regular progress reports](#), and insights from monitoring tools and supplier engagement updates (see Palm Progress Reports)

We welcome feedback and comments from at responsibility@adm.com



