



Soy Responsible Sourcing Policy

Effective Date: March 2015

Last Update/Review Date: May 2026

1. Purpose

This policy defines how ADM implements its *Policy to Protect Forests, Biodiversity and Communities* across the soy supply chains.

It establishes commodity-specific requirements for:

- Deforestation- and conversion-free sourcing
- Traceability and monitoring
- Supplier compliance

This policy should be read alongside ADM's [Policy to Protect Forests, Biodiversity and Communities](#). Where requirements are not specified in this policy, the provisions of the enterprise policy apply.

ADM will expand this approach over time to additional commodities, including corn and cotton, in regions where they share production systems and geographic footprints with soy, as part of a phased implementation of responsible sourcing commitments.

2. Scope

This policy applies globally to all soybeans and soybean products sourced by ADM, all direct and indirect soy suppliers across the supply chain, and all operations and majority-owned joint ventures.

ADM implements this policy using a risk-based approach, as described in Section 4.

Commodity-specific cutoff dates apply to soy sourced from high-risk regions defined in this policy. Outside of these regions, ADM implements its commitments in alignment with its *Policy to Protect Forests, Biodiversity and Communities* and applicable local conditions.

The approach and requirements defined in this policy currently apply to soy. ADM intends to expand the scope to corn and cotton over time, prioritizing regions where they share production systems and geographic footprints with soy.



3. High-Risk Areas

ADM prioritizes implementation of this policy in regions where deforestation and conversion of primary native vegetation risks are greatest. These include the following biomes of Amazon, Cerrado, Pantanal and Chaco¹. ADM applies its commitments across all countries within these biomes where it sources commodities.

These biomes represent priority sourcing regions where the risk of deforestation and conversion of primary native vegetation is highest based on sectoral assessments and geospatial analysis.

In these areas, ADM applies enhanced traceability, monitoring, and supplier engagement requirements as part of its risk-based approach, beginning with soy and expanding to other commodities over time.

4. Core Requirements

4.1 Deforestation- and Conversion-Free Sourcing

ADM will not source soy produced on land that has been subject to deforestation and conversion of primary native vegetation after January 1, 2025.

4.2 Traceability and Monitoring

ADM applies a risk-based approach to traceability and monitoring, reflecting differences in supply chain structure between direct and indirect suppliers. The level of traceability and monitoring applied reflects the level of deforestation and conversion of primary native vegetation risk associated with specific sourcing regions and commodity production, particularly in the high-risk biomes defined in this policy.

- **Direct soy suppliers**
 - Soy is traced to the farm level (e.g., farm polygons)
 - Compliance with deforestation- and conversion-free requirements is verified through geospatial monitoring and supplier data

¹ ADM follows official biome boundaries established by national authorities in each relevant sourcing country.



- **Indirect soy suppliers**

- Sourcing is assessed using a risk-based methodology. This includes the use of subnational risk classification and geospatial analysis of sourcing areas (e.g., radius-based assessments around aggregation points)
- Sourcing areas may be classified as deforestation- and conversion-free only when the percentage of production area overlapping with deforested or converted primary native vegetation represents a negligible or zero risk

ADM prioritizes monitoring and engagement in high-risk areas and suppliers.

ADM will continue to enhance traceability across supply chains, including progressing toward increased farm-level traceability for indirect suppliers, prioritizing high-risk areas, in line with appropriate methodologies and implementation roadmaps.

4.3 Supplier Expectations

In addition to ADM's applicable company policies, including the [Human Rights Policy](#) and [Supplier Expectations](#), ADM requires soy suppliers to:

- Comply with applicable environmental, labor, and land-use laws
- Not source or produce on land that is embargoed or otherwise non-compliant, including areas where deforestation or conversion of native vegetation has occurred after the applicable cutoff date
- Provide information necessary for traceability and monitoring
- Engage with ADM to address identified risks or non-compliance
- Demonstrate continuous progress toward deforestation- and conversion-free production

5. Cutoff and Target Dates

ADM establishes a deforestation- and conversion-free cutoff date of January 1, 2025, and a target date of December 31, 2025, for implementation of these requirements for soy originating in Brazil, Paraguay and Argentina.

6. Implementation

ADM implements this policy through its enterprise due diligence framework, including:

- Risk-based supplier assessment



- Supply chain monitoring and verification
- Supplier engagement and corrective action processes
- Grievance mechanisms and remediation pathways

Non-compliance is addressed in accordance with ADM's [Managing Supplier Non-Compliance Procedure](#) and [Grievances and Resolutions Protocol](#), which define escalation measures, including potential suspension or disengagement from suppliers where necessary.

These systems are defined in the [Policy to Protect Forests, Biodiversity and Communities](#).

ADM will report on progress toward deforestation- and conversion-free sourcing, including coverage of direct and indirect supply chains.

7. Continuous Improvement

ADM will continue to strengthen its approach to responsible sourcing by:

- Enhancing traceability across direct and indirect soy supply chains
- Improving monitoring and verification capabilities
- Supporting initiatives that promote sustainable production and supply chains
- Collaborating with suppliers, customers, and stakeholders to address systemic challenges

This includes advancing traceability, strengthening risk assessment methodologies, and supporting landscape-level initiatives in high-risk regions.

ADM will progressively extend the application of this policy to corn and cotton over time, prioritizing regions where they share production systems and geographic footprints with soy, using a phased, risk-based approach aligned with ADM's [Policy to Protect Forests, Biodiversity and Communities](#). This will include the development of commodity-specific implementation plans aligned with supply chain complexity, traceability maturity, and regional risk profiles. Implementation timelines for corn and cotton in different geographies will be defined through these plans and will be aligned with ADM's current approach for soy and the broader framework set out in the enterprise policy.

8. Definitions

- **Biodiversity:** The total variety of living organisms, including ecological interactions, populations and communities in which they live (FAO Term Portal).



- **Conversion of primary native vegetation:** Change of a natural ecosystem, such that a human caused change of non-forest primary native vegetation results in another land use or profound change in a natural ecosystem's species composition, structure, or function.
- **Cutoff date:** Date after which deforestation or conversion of primary native vegetation renders a given area or production unit non-compliant with ADM's [Policy to Protect Forests, Biodiversity and Communities](#).
- **Deforestation:** Conversion of primary native forests to other land use independently whether human-induced or not (FAO, 2020).
- **Direct soy supplier:** A farmer or farming company that supplies soy or soybean products to ADM under a direct commercial relationship.
- **Ecosystems:** All living things in a given area, as well as their interactions with each other, and with their non-living environments (weather, earth, sun, soil, climate, atmosphere). Each organism has a role to play and contributes to the health and productivity of the ecosystem as a whole (FAO Term Portal).
- **Forest:** Land spanning more than 0.5 hectares with trees higher than 5 meters and a canopy cover of more than 10 percent, or trees able to reach these thresholds in situ. It does not include land that is predominantly under agricultural or urban land use (FAO, 2020).
- **High-risk areas:** Regions or biomes considered at risk for deforestation or conversion of non-forest primary native vegetation that need protection. The Amazon, Cerrado, Pantanal, and Chaco are ADM's currently defined high-risk areas for commodities production.
- **Indirect soy supplier:** An aggregator, cooperative, or other third party that supplies soy or soybean products to ADM, sourcing from multiple farmers or producers further upstream in the supply chain.
- **Ownership stake or equity stake:** The percentage of a business owned by the holder of some number of shares of stock in that company. For the purpose of the policy, it refers to ownership stake of more than 50% by ADM.
- **Primary native vegetation:** An assemblage of native plant species in a specific place or region that has adapted to environmental and biological conditions and has suffered little or no human intervention.



- **Target date:** Date by which the company intends to have fully implemented its policy in a given supply chain.

9. References

- FAO, 2020. Global Forest Resource Assessment 2020. Terms and Definitions. FRA 2020, Rome. <http://www.fao.org/3/i8661EN/i8661en.pdf>
- Food and Agriculture Organization. (n.d.). FAO Term Portal. <https://www.fao.org/faoterm/en>
- OECD/FAO, 2023. OECD-FAO Business Handbook on Deforestation and Due Diligence in Agricultural Supply Chains, OECD Publishing, Paris. <https://doi.org/10.1787/c0d4bca7-en>

10. Contact Information

Concerns related to the application of this policy can be reported through the [ADM Way Helpline](#) or by contacting our Grievance and Resolution channel at responsibility@adm.com.