



Declaration of Principle as per the German Act on Corporate Due Diligence Obligations in Supply Chains (*LkSG*)

Our Commitment to the Protection of Human Rights

ADM WILD Europe GmbH & Co. KG (hereinafter referred to as “ADM”) unlocks the power of nature to enrich the quality of life.

We, ADM and all its subsidiaries are committed to respecting and promoting human rights and protecting the environment.

As a world’s leading agriculture and nutrition company, we are aware of our responsibility to protect human rights and the environment. We see this responsibility as an integral part of our business and corporate policy.

This declaration of principle describes our strategy to meet this responsibility in our own operations and supply chains. Our human rights strategy includes measures to promote human and environmental rights, to identify risks to protected rights at an early stage, to minimize them and to take appropriate corrective action in the case of violations. Our strategy is informed by international frameworks and guidelines, among other:

- Fundamental Principles and Rights at Work of the International Labour Organization (ILO)
- United Nations (UN) Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- the German Act on Corporate Due Diligence Obligations in Supply Chains (“Lieferkettensorgfaltspflichtengesetz”).

Our Human Rights Strategy

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.

Our human rights and environmental standards and expectations, which form the basis for our measures to protect human rights, have been defined in more detail in group-wide policies which apply to both our own operations and the cooperation with our partners within our supply chains: [Human Rights Policy](#), [Environmental, Health & Safety \(EHS\) Policy](#), [Policy to Protect Forests, Biodiversity and Communities](#), [ADM Supplier Expectations](#).

We understand compliance with the standards set out in our policies as a basic prerequisite for doing business with us. Our goal is to work actively with our direct suppliers to ensure that human rights and environmental rights are respected within our business relationships and to establish these standards with our indirect suppliers as well.

Our policies require our direct suppliers to respect human and labour rights described in such policies in more detail, such as the prohibition of forced labour, child labour and discrimination, and to use natural resources responsibly. The policies also set out our expectation that our direct suppliers have appropriate reporting mechanisms in place and promptly notify us of any potential human or environmental rights violations in their own operations or along their supply chains. They also refer to consequences that violations of the standards set out in the policies may have for our direct suppliers.





Beside our policies, we adhere to and apply our group-wide [Code of Conduct](#) in our own operations. This Code of Conduct sets out our ethical standards including our expectations towards our employees with regard to human rights and the environment.

Our Code of Conduct describes our basic ethical principles for the protection of our employees, our community and our planet. It clarifies what rights need to be protected, the obligations of each of our employees' and specifies how we translate our ethical standards into sustainable action in our daily work. In addition to our commitment to respect and promote human rights, the Code of Conduct sensitizes our employees to topics such as non-discrimination, workplace safety and the responsible use of resources. The Code of Conduct also contains further information on our whistleblowing system for reporting potential violations of our Code of Conduct.

Risk and Impact Assessment

In order to address human rights and environmental risks arising from our business activities in an efficient manner, we have developed a risk analysis process. This enables us to identify, assess and prioritize relevant human rights and environmental risks in our own operations as well as in our direct suppliers' operations.

In order to identify risks that are relevant to us, we first use country and industry-specific risk scores that are based on a variety of recognized indices and data sources from international human rights organizations, as part of an abstract risk analysis.

The business areas and supplier relationships identified on this basis with an increased risk are subject to a concrete, in-depth risk analysis.

For this in-depth analysis we involve internal experts and leverage the abstract risk assessment. Based on the results of this in-depth risk analysis, we prioritize particularly relevant risks and high risk suppliers. Based on our initial abstract risk analysis, we have identified the following topics as mostly relevant in the context of our business activities: forced labor, impact on communities, Living wage, Health and safety, just transition in agriculture, and Child labor. These topics are the focus of the further in-depth risk analysis.

The risk analysis is carried out on an annual basis as well as on an ad hoc basis in case of changes of our risk profile. The insights gained from the risk analysis are incorporated into our efforts of implementing effective actions. We extend the risk analysis to our indirect suppliers along our supply chains if we have actual indications for a violation of human rights or environmental standards.

Implementing Effective Actions

In order to prevent human rights violations and counter environmental risks, we have updated existing processes and established further measures both in relation to our own operations and to our partners. We consider the transfer of knowledge and increase of awareness on human rights and environmental requirements to be a key element in mitigating human rights and environmental risks in our own operations and in our supply chains. We regularly train our employees on the standards set out in our Code of Conduct and our policies. In addition, our employees receive further training on human rights and environmental standards in the business areas which are particularly relevant to the implementation of our human rights strategy, like procurement, food safety and quality and human resources. The





publication and communication of this declaration of principle is also part of our effort of implementing effective actions.

Generally, we expect our direct suppliers to contractually adhere to the minimum standards set out in our policies and ADM supplier expectations and to work towards compliance by their own business partners. This also includes that our direct suppliers have appropriate management processes in place and pass our minimum standards to their own business partners along their supply chain.

Depending on the risk level of the respective supplier, our further measures include among other obtaining further contractual assurances, self-assessment questionnaires (e.g. with EcoVadis), or frequent and annual audits (e.g. with Sedex) and agreeing individual corrective action plans. To lead by example, our own operations are regularly audited by Sedex SMETA framework.

Sedex is the world's largest data platform for supply chain assessment and sustainable supply chain solutions. The assessment is based on inherent risk data, site information, information provided by suppliers through self-assessment questionnaires, as well as audits. This allows to identify relevant human rights and environmental risks and to prioritize risk suppliers and areas that need action.

Dealing with Violations

We respond to violations of human rights and environmental standards consistently and with appropriate measures. Should a violation occur or be imminent in our own business, we will immediately take appropriate corrective action to prevent or cease the violation.

If we become aware of a potential violation along our supply chain, we will first investigate the concern in cooperation with our supply chain partners as per our [Managing Supplier Non-Compliance protocol](#).

In the event that a breach has occurred or is imminent at one of our direct suppliers, we will immediately take appropriate corrective action to prevent, stop or minimize the extent of the violation. If it is not possible to end the violation in a reasonable timeframe, we will work with the direct supplier to develop a corrective action plan to cease the violation and prevent future violations. Depending on the severity of the violation, the actions may also include the suspension or termination of the business relationship with a supplier.

In the event of fact-based knowledge of a violation at one of our indirect suppliers, we will take appropriate measures such as risk analysis, implementing effective actions, development of a corrective action plan, or other, depending on the individual case.

Tracking and Monitoring

We see our human rights strategy and its implementation as a process that we have to regularly review and continuously enhance in terms of its timeliness, effectiveness and efficiency.

The implementation of the human rights strategy is monitored by way of risk-based control measures. In addition, the results of our annual and ad hoc risk analyses, as well as the findings of whistleblower reports and feedback from experts involved in the implementation, are incorporated into the further development of our prevention and corrective action program. If necessary, we update our processes and standard measures. The same applies to the effectiveness of preventive actions and the complaints procedure, which we also review once a year and on an ad hoc basis.





Documentation and Reporting

We continuously document our risk analysis as well as the actions we take to prevent or remedy human rights or environment-related violations and report annually on our progress.

Grievance and Remedy

We are aware that despite greatest care in the implementation of our prevention program, violations of human rights and environmental standards can occur at our suppliers, but also in our own business. We have therefore set up a whistleblowing system that offers to everyone inside and outside our company the opportunity to report human rights and environmental violations or breaches of the law in connection with our own business activities and the business activities of our business partners, especially our suppliers. Information from employees, suppliers and third parties helps us to identify violations so that action can be taken, prevent damage to our fellow human beings and the environment, and to avoid future violations.

Concerns can be reported by e-mail (responsibility@adm.com) or via the [ADM Way Helpline](#), an online tool that can be accessed via smartphone and PC and allows anonymous reporting if preferred.

We take all reports of potential violations of human rights and environmental standards very seriously. Further information on ADM Grievance and Remedy mechanisms can be found in the [Grievances and Resolutions protocol](#), the [Managing Supplier Non-Compliance protocol](#), and the [ADM Way Helpline](#).

Responsibilities for the implementation of this declaration of principle

To implement this declaration of principle, we have established responsibilities in the relevant business areas including sustainability, procurement, quality management, legal and compliance. The overall responsibility for the implementation of this declaration of principle lies with the management of ADM whereas the monitoring of the implementation lies with the appointed supply chain law officer. This declaration of principle was adopted by the management of ADM. It will be made publicly available and uploaded on ADM website.

