



Sustainable Financing Framework

February 2022

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I – ADM – Unlocking Nature. Enriching Life.

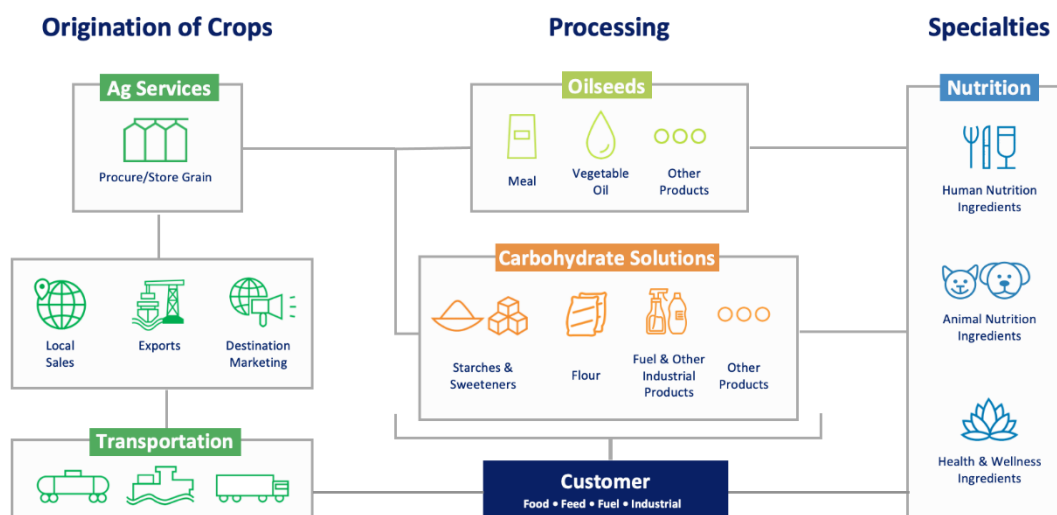
Company Overview

Archer-Daniels-Midland Company (“ADM”) is a global leader in human and animal nutrition and the world’s premier agricultural origination and processing company. Headquartered in Chicago, Illinois, our purpose is to unlock the power of nature to enrich the quality of life worldwide. With more than 800 facilities, our 40,000 colleagues serve customers in 200 countries, serving as a bridge between the producer on the farm and the consumer-facing brands on our table.

ADM’s operating structure is segmented across the following three units that come together to provide our products and services:

- **Agricultural Services & Oilseeds:** This segment includes global activities related to the origination, merchandising, transportation, and storage of agricultural raw materials, and the crushing and further processing of oilseeds. Oilseeds products produced and marketed by the segment include ingredients for food, feed, energy, and industrial customers.
- **Carbohydrate Solutions:** Our Carbohydrate Solutions segment consists of our Corn and Milling operations. Products include food and beverage components including sweeteners, syrup, starch, sugar, flour, and dextrose; as well as renewable fuel ethanol and our Biosolutions business that produces sustainable materials for various applications.
- **Nutrition:** Our Nutrition segment serves various end markets including foods, beverages, nutritional supplements, and feed and premix for livestock, aquaculture, and pet food. This segment engages in the 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, enzymes, botanical extracts, and other specialty food and feed ingredients, including edible beans.

Serving Customers Across the Value Chain with Unmatched Products & Services



Sustainability Strategy

At ADM, sustainable practices and a focus on environmental responsibility are not separate from our primary business: they are integral to the work we do every day to serve customers and create value for shareholders. Fulfilling our purpose to unlock the power of nature to enrich the quality of life is made possible by our efforts in environmental, social and governance (ESG). Consumers around the world expect that food and beverage products come from sustainable ingredients, produced by companies that follow similar standards. Therefore, ADM has been working independently and with other stakeholders to advance the critical work to end deforestation, preserve biodiversity, and conserve resources in our operations and across the entire food and agriculture supply chain.

Our relationships with farmers around the globe give us unparalleled opportunities to combat greenhouse gas emissions on the farm and advance sustainable agriculture practices. We have set aggressive goals to reduce the environmental impact of our own operations. Our array of innovative, bio-based products offer alternatives to everything from traditional meats to petroleum-based products.

Honesty and integrity – of our colleagues and our partners – are core foundations of our culture. We uphold all of the principles listed in our Code of Conduct to ensure the company always operates fairly and ethically. ADM is devoted to Diversity, Equity and Inclusion (DEI) in addition to Human Capital Management. We prioritize and protect the human rights of our employees, those within our value chain, and those within the communities in which we operate. As we continue to have a direct impact on several communities around the world due to our sourcing practices, we use the United Nations Human Development Index (HDI) to prioritize higher-risk geographies and commodities within our global reach.

Our Commitments

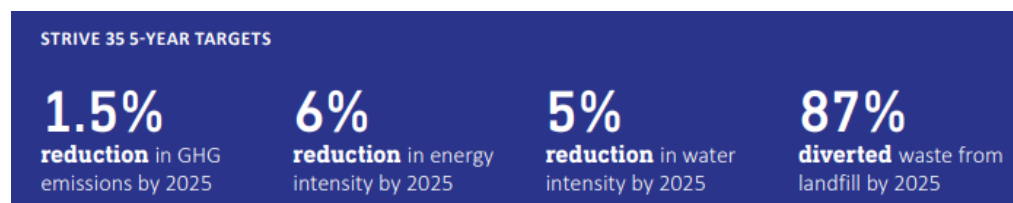
The United Nations Sustainable Development Goals (SDGs) were first introduced in 2015 as a universal call to action to end poverty, protect the planet, and ensure that all people enjoy peace and prosperity. At ADM we have undertaken a mapping exercise to determine which SDGs align with our business objectives and, in turn, allow us to make the greatest contribution toward achievement. Our main focus areas are Zero Hunger, Clean Water and Sanitation, Decent Work and Economic Growth, Climate Action, and Life on Land.

Our sustainability agenda is informed by the 17 SDGs and Sustainability Accounting Standards Board (SASB). From these guidelines we have been able to align our business objectives and create a set of material goals, including environmental goals focused on reducing our impact and conserving resources; greenhouse gas reduction goals covering our own footprint as well as Scope 3 supply chain emissions; and no-deforestation goals aimed at eliminating deforestation and conversion in our supply chains.

MATERIAL TOPIC	GOAL	PROGRESS	TARGET DATE	SDG/SASB ALIGNMENT	
				SDG	SASB
 Emissions	25% absolute reduction in GHG emissions over 2019 baseline by 2035*	 In progress  8.9% reduction	12/31/2035	 	Greenhouse Gas Emissions
 Energy	15% reduction in energy intensity over 2019 baseline by 2035	 In progress  1.7% reduction	12/31/2035	 	Energy Management
 Water	10% reduction in water intensity over 2019 baseline by 2035	 In progress  1.9% reduction	12/31/2035	  	Water Management
 Waste	90% diverted waste from landfill over 2019 baseline by 2035	 In progress  83.4% diverted	12/31/2035	  	

*Includes Scope 1 (direct emissions from our equipment), Scope 2 (emissions from the electricity and steam we buy from local utilities), and Scope 3 (emissions resulting from the activities of assets not owned or controlled by ADM) emissions

To ensure we are charting a path to achieve our Strive 35 goals, we also set 5-year targets to measure our progress against these longer-term goals:



Additionally, our commitment to sustainable agriculture is reflected in our published “Policy to Protect Forests, Biodiversity and Communities” where we announced our goal to completely eliminate deforestation from all of our supply chains by 2030. In this policy we have outlined supply chain specific policies for Palm Oil, Soy, and Conversion of Native Vegetation. To ensure the continued effective implementation of these ADM ESG policies, we regularly update our log of grievances and resolutions through which we publicly disclose inquiries about our supply chains. We also publish semi-annual progress reports with milestones and data focused on Palm Oil and South American Soy.

Today ADM is a member of several global communities that promote sustainability and ethical business such as the Business Ethics Leadership Alliance (BELA), International Sustainability and Carbon Certification (ISCC), and the Round Table on Sustainable Palm Oil (RSPO). We are also strong supporters and signatories of global initiatives that align with our values, such as the UN Global Compact and ITC’s Trade for Sustainable Development Principles.

Sustainability Reporting and Governance

At ADM, the Sustainability and Corporate Responsibility Committee (“Sustainability Committee”) of the Board of Directors has direct oversight responsibility for the company’s objectives, goals, strategies, and activities relating to sustainability and corporate responsibility matters. The Sustainability Committee also

oversees the company's compliance with sustainability and corporate responsibility laws and regulations, assesses performance relating to industry benchmarks, and assists the Board of Directors in ensuring that the company operates as a sustainable organization and responsible corporate citizen in order to enhance shareholder value and protect ADM's reputation.

Regional sustainability teams, along with the corporate sustainability team, support the Chief Sustainability Officer to drive sustainability efforts in our facilities and supply chains around the world. Our sustainability efforts are also supported by Centers of Excellence (CoE) that drive efficiency programs in their areas of focus such as the Utilities CoE; Diversity, Equity and Inclusion CoE; and Environmental, Health and Safety CoE.

To further drive ADM's commitment to doing business with integrity and responsibility, we have designed a strong Sustainability Governance and Risk Management framework. At the management level, the expectations and standards we have for our facilities and supply chains are directly overseen by the Sustainability Committee. Further description on our governance structure can be seen below.

Sustainability Governance: Strategy and Risk Overview

Board of Directors

- Receives sustainability updates at each quarterly Board meeting
- Reviews risk matrices, including risks related to climate change and other sustainability matters, prepared by ERM team at each quarterly Board meeting

Sustainability and Corporate Responsibility Committee of the Board

- Has direct oversight responsibility of objectives, goals, strategies, risks, and activities related to sustainability

Vice President, Chief Sustainability Officer (CSO)

- Leads ADM's sustainability efforts
- Reports metrics quarterly to ADM Board of Directors
- Meets quarterly with ADM Board of Directors' Sustainability and Corporate Social Responsibility Committee
- Reports regularly to ADM leadership

Regional and Corporate Sustainability Teams

- Support business units to drive transformation and help create value across the supply chain
- Support sustainability initiatives and implementation on the ground
- Engage and interact with stakeholders
- Located in North America, South America and EMEA

Further, ADM's sustainability reporting adheres to the guidelines set forth by the Global Reporting Initiative. The disclosures included in our Sustainability Report also align with the requirements of the Task Force on Climate Related Financial Disclosures (TCFD) and SASB. To ensure our focus areas remain relevant and effective, ADM regularly conducts a materiality assessment to identify topics that reflect the economic, environmental, and social impacts that are the most significant to our sustainability strategy and stakeholders.

More information about our sustainability commitments and ESG initiatives can be found in our annual Sustainability Report at ADM.com.

Rationale behind this Sustainable Financing Framework

In accordance with the Global Reporting Initiative (GRI) Framework and as noted above, ADM conducts regular materiality assessments. With so many topics that could be covered, conducting a materiality assessment allows us to focus our reporting on topics that reflect the economic, environmental, and social impacts that are the most significant to our strategy and business operations, and to our stakeholders. The most recent assessment, completed in Q1 2021, indicated several key topics that are consistent across all stakeholder groups as critically important: “GHG Emissions,” “Deforestation & Conversion,” “Governance,” and “Water Management.” Through this Sustainable Financing Framework, we plan to further the development and implementation of programs that address these topics and others identified by our materiality assessment. We intend to use this Sustainability Financing Framework to identify sustainable financing opportunities to address and provide solutions to these complex topics and bring us closer to achieving our vision.

II Our Sustainable Financing Framework

This Sustainable Financing Framework is in alignment with the core components of the Green Bond Principles (“GBP”), updated in June 2021, the Social Bond Principles (“SBP”), updated in June 2021, as well as the Sustainability Bond Guidelines, updated in June 2021 (the “SBG”), each published by the International Capital Markets Association (“ICMA”). The GBP, SBP, and SBG (collectively, the “Principles”) are a collection of voluntary frameworks with the stated mission and vision of promoting the role that global debt capital markets can play in funding projects that contribute to financing progress towards environmental and social sustainability.

ADM intends to follow best market practices and will communicate in a transparent manner on the four core components of the GBP and SBP:

1. Use of Proceeds
2. Process for Project Evaluation and Selection
3. Management of Proceeds
4. Reporting

Use of Proceeds

We expect to apply an amount equal to the net proceeds of any green, social, or sustainability bond (each, a “Sustainable Bond”) issued to finance and/or refinance, in whole or in part, one or more new and/or existing eligible Green Projects and/or eligible Social Projects (together, “Eligible Projects”).

Eligible Green Projects are investments and expenditures made by us or any of our subsidiaries that contribute to environmental objectives such as: sustainable aquaculture and animal husbandry, sustainable agriculture, green buildings, energy efficiency, renewable energy, clean transportation, water and waste management, and pollution prevention and control.

Eligible Social Projects are investments and expenditures made by us or any of our subsidiaries that aim to address or mitigate a specific social issue and/or seek to achieve positive social outcomes especially, but not exclusively, for certain target populations, such as: socioeconomic advancement and empowerment, and food security and sustainable food systems.

We expect that each of our Eligible Projects will meet one or more of the following eligibility criteria:

Green or Social Eligible Project Category	Eligibility Criteria and example projects	Sustainable Development Goal (SDG)
Sustainable Aquaculture and Animal Husbandry	Investments and expenditures (including research and development (“R&D”)) to reduce the environmental impact and resource use associated with aquaculture and animal husbandry. Example projects may include:	 
	(i) Development of alternatives to animal feed, such as insect ingredients	
	(ii) Development of plant-based fish feed for sustainable aquaculture	
Sustainable Agriculture	Investments and expenditures to protect, restore, and promote sustainable use of terrestrial ecosystems. Example projects may include:	 
	(i) Expenditures made to procure deforestation-free palm oil and soybeans	
	(ii) Procurement costs for third party certified ingredients, such as Proterra or RTRS, RSPO or Rainforest Alliance, Fairtrade, ISCC, REDcert, Vivescia, Invivo, Red Tractor, Leaf, ARSS, Field-to-Market	
	(iii) Expenditures to support supply chain traceability	
	(iv) Expenditures to support financial and technical assistance directly linked to specific regenerative agricultural practices such as cover crops, no-till and development of alternative proteins for consumption	

	(v) Spend on acquisition of firm that develops and markets alternative plant-based proteins for consumption	
Green Buildings	Investments and expenditures to conserve water and reduce carbon emissions, energy usage, and waste related to the design, construction, maintenance or refurbishment of buildings. Example projects may include: (i) Capital investments in new or existing (office) facilities with Leadership in Energy and Environmental Design (LEED) Gold or Platinum or other equivalent local or regional sustainability certifications (ii) Lease payments for LEED Gold or Platinum certified buildings payable under long-term contracts (i.e. at least 5 years)	
Energy Efficiency	Investments and expenditures related to improving and optimizing energy efficiency. Example projects may include: (i) Computer-based control systems installed in buildings that control and monitor the buildings' mechanical and electrical equipment, LED lighting or HVAC upgrades (ii) Replacement of air compressors or installation of cogeneration technology that result in energy savings of at least 30%	
Renewable Energy	Investments in the generation capacity for renewable energy and expenditures related to the procurement of renewable energy. Example projects may include: (i) On-site wind and solar projects (ii) Power purchase agreements (PPAs) with renewable energy providers (including wind, solar or small hydro (run-of-river or <25MW)) with a term of at least 5 years (iii) Expenditures to support the production of renewable green diesel feedstock	

	(iv) R&D expenditures to support the development of renewable energy solutions, including renewable natural gas	
Clean Transportation	Expenditures to reduce the emissions of our transportation fleet. Example projects may include: (i) The purchase of electric, hybrid, or renewable biodiesel vehicles with CO2 emission thresholds of less than 50 gCO2/pkm, as well as supporting charging infrastructure (ii) Investments related to projects to support the use of renewable fuels or emissions reductions in the transportation sector	
Water and Waste Management	Expenditures to reduce water consumption and improve water quality, including investments in wastewater treatment infrastructure and water metering equipment. Example projects may include: (i) Expenditures on membranes and other equipment to reduce water withdrawal	
Pollution Prevention and Control	Expenditures (including R&D and capital expenditures) for projects related to the reduction of waste, improvement of recycling and reduction of air emissions. Example projects may include: (i) Carbon Sequestration Projects (ii) CAPEX for construction of highly efficient, reduced footprint processing locations	
Socioeconomic Advancement and Empowerment	Investments and expenditures to empower women and smallholders socially and economically through microfinancing programs, training programs for female farmers. Example projects may include: (i) Projects to identify and implement microfinancing (ii) Programs to identify risks/gaps in supply chain and address through education or other opportunities for women and/or smallholders	
Food Security and Sustainable Food Systems	Investments to empower smallholder farmers and promote environmentally-responsible farming practices. Example projects may include:	

(i)	Expenditures to support farmers to obtain third party certification for sustainable farming practices	
(ii)	Training on environmentally responsible agricultural practices	

Exclusions: Any expenditures related to fossil fuel technologies are explicitly excluded from allocation to any Eligible Project.

Target Populations: Target populations for any social Eligible Project may be further defined in conjunction with a discrete issuance of a Sustainable Bond in the relevant offering documentation, as applicable. Target populations will align with the SBP.

Process for Project Evaluation and Selection

We have established a Sustainable Finance Committee (the “Committee”) that includes representatives from different internal organizations: Sustainability, Treasury, Legal, Procurement, and Operations. The Committee, will be responsible for identifying, evaluating and selecting eligible projects based on the eligibility criteria in this Sustainable Financing Framework. Further, the Committee will be responsible for reviewing the allocation and impact reporting, for ensuring a comprehensive external verification process, and for updating the Sustainable Financing Framework, if applicable.

The Committee will be responsible for project selection and evaluation which will go through a multi-step process:

- Project or expenditure must fit within ADM’s sustainability strategy focused specifically on climate obligations, responsible sourcing practices, or community engagement.
- Any negative environmental and social risks associated with the project must be assessed. Risks will be identified and managed in accordance with ADM’s world-class operating standards and procedures, including the guidelines laid out in ADM’s Policy to Protect Forests, Biodiversity and Communities; the Environmental, Health and Safety Policy; the Respect for Human Rights Policy; the Responsible Soy Standard; the Statement on Animal Testing; and ADM’s Protocol for Managing Supplier Non-Compliance.
- Project or expenditure must align with the Sustainable Financing Framework.

Management of Proceeds

We will deposit an amount equal to the net proceeds from the issuance of any Sustainable Bond in a general bank account of ADM and earmark an amount equal to the net proceeds for allocation to Eligible Projects, in accordance with this Sustainable Financing Framework. The Committee will track and keep a record of the amount of net proceeds from the sale of any Sustainable Bond allocated to Eligible Projects.

Any necessary changes to or modifications of the allocation to Eligible Projects will be managed and reviewed by the Committee.

We intend to allocate the full amount of the net proceeds from each Sustainable Bond as soon as practical, but at least within 24 months from the date of issuance. The Eligible Projects may include investments and expenditures that were financed up to 36 months prior to the issuance of a Sustainable Bond.

Pending the allocation or reallocation, as the case may be, we may invest an amount equal to the net proceeds from the sale of any Sustainable Bond in cash, cash equivalents, or other short-term marketable securities, in accordance with the Company's liquidity management policy.

Reporting

If we issue Sustainable Bonds, we will report on the allocation of net proceeds and, where feasible and applicable, associated expected impact metrics within one year from the inaugural issuance date and annually thereafter until the net proceeds are fully allocated to Eligible Projects and promptly as practicable in case of any material change in allocation thereafter. Any impact calculation methodologies and assumptions will be disclosed at time of reporting.

As much as possible, we intend to align reporting practices with the ICMA recommendations as detailed in the "Handbook - Harmonized Framework for Impact Reporting," updated in June 2021.

Any Sustainable Bond Report (a "Report") will be published as a separate investor communication and will be published on our corporate website.

Any Report will include:

- The total net proceeds from the sale of any Sustainable Bond that have been allocated to one or more Eligible Projects, either individually or by category, and a brief description of certain representative projects within each category;
- The amount of net proceeds from the sale of any Sustainable Bond that have been allocated to the refinancing of existing Eligible Projects, if applicable;
- The outstanding amount of net proceeds from the sale of any Sustainable Bond yet to be allocated to Eligible Projects at the end of the reporting period; and
- Where feasible, relevant expected impact metrics.

Additional reporting will be made in case of any material changes to the underlying allocations.

Sample Impact Metrics

Where feasible, we plan to report on expected impact metrics for Eligible Projects. Examples of possible metrics include:

Green or Social Eligible Project Category	Example Impact Metrics
Sustainable Aquaculture and Animal Husbandry	• Units sold of sustainable alternative animal feeds
Sustainable Agriculture	• Farm acres converted to Organic (ECO-Cert) • # of technical audits conducted • % of fully traceable commodity sourcing • Acres implementing sustainable practices
Green Buildings	• Office or facility space that is certified as LEED Gold, Platinum, or other equivalent local or regional sustainability certification (sq ft)
Energy Efficiency	• Sample projects with indication of energy efficiency improvement achieved • % reduction in energy intensity
Renewable Energy	• On Site Renewable energy generation capacity (MW) • Off-site renewable energy sourcing (MWh) • Renewable energy consumption as % of total energy consumption
Clean Transportation	• % electric, hybrid, or renewable biodiesel vehicles in fleet
Water and Waste Management	• % reduction in water intensity
Pollution Prevention and Control	• % reduction in GHG emissions
Socioeconomic Advancement and Empowerment	• # of micro financings provided • Impact on smallholder farmers income • # of signed adherents to the child labor code of conduct • # of child labor awareness training sessions provided to farmers
Food Security and Sustainable Food Systems	• # of farmers trained on responsible agricultural practices • Volume of rice distributed to smallholder farmers during the lean period

External Review

Second Party Opinion:

Standard & Poor's Financial Services LLC ("S&P") has provided a second party opinion (the "Opinion") on this Sustainable Financing Framework. S&P's opinion intends to provide an assessment of the alignment

of the Sustainable Financing Framework with the transparency and reporting requirements of the Principles as well as assess ADM's overall sustainability objectives and alignment with the Sustainable Financing Framework. The Opinion will be made available on ADM's website.

Assurance:

ADM intends to engage an independent auditor to provide a limited assurance report over the allocation of the net proceeds of any Sustainable Bond to Eligible Projects and may also engage an independent consultant with experience in sustainability research and analysis.

The independent auditor will be engaged one year after issuance or after full allocation to review that the aggregate amount allocated to Eligible Projects is equal to or greater than the net proceeds attributable to outstanding Sustainable Bonds.

Amendments to this Framework

The Committee will review this Sustainable Financing Framework on a regular basis, including its alignment to updated versions of the Principles as and when they are released, with the aim of adhering to best practices in the market. Such review may result in this Sustainable Financing Framework being updated and amended. If the changes are material, ADM will seek a new second party opinion. Any future updated version of this Sustainable Financing Framework that may exist will either maintain or improve the current levels of transparency and reporting disclosures, including the corresponding review by an external reviewer. An updated Sustainable Financing Framework, if any, will be published on ADM's website and will replace this Sustainable Financing Framework.

III Disclaimer

This Sustainable Financing Framework is intended to provide non-exhaustive, general information. This Sustainable Financing Framework represents current Archer-Daniels-Midland Company, Incorporated (“ADM”) policy and intent and is not intended, nor can it be relied on, to create legal relations, rights or obligations. This document may contain or incorporate by reference public information not separately reviewed, approved or endorsed by ADM and accordingly, no representation, warranty or undertaking, express or implied, is made and no responsibility or liability is accepted by ADM as to the fairness, accuracy, reasonableness or completeness of such information.

This Sustainable Financing Framework is provided for informational purposes only and does not constitute a recommendation regarding the purchase, sale, subscription or other acquisition or disposal of any debt or other securities of ADM or any of its subsidiaries (“securities”). This Sustainable Financing Framework is not and is not intended to be, and does not constitute or form part of, and should not be construed as, an offer to sell or an offer or invitation to buy, or the solicitation of an offer or invitation to buy, any securities of ADM or any of its subsidiaries. If any such offer or invitation is made, it will be done pursuant to separate and distinct documentation (the “Offering Documents”) and any decision to purchase or subscribe for any securities pursuant to such offer or invitation should be made solely on the basis of such Offering Documents and not these materials. Prospective investors should make their own independent investigations and appraisals of the business and financial condition of ADM and its subsidiaries and the nature of the securities before taking any investment decision with respect to securities of ADM or any of its subsidiaries.

This material is not intended for distribution to, or use by, any person or entity in any jurisdiction or country where such distribution or use would be contrary to law or regulation. Persons into whose possession such documents may come must inform themselves about, and observe, any applicable restrictions on distribution.

The information and opinions contained in this Sustainable Financing Framework are provided as of the date of this Framework and are subject to change without notice. ADM has and undertakes no obligation to update, modify or amend the information contained herein or to otherwise notify any recipient if any information, opinion, projection, forecast or estimate set forth herein changes or subsequently becomes inaccurate. None of ADM, its subsidiaries or any of its representatives and affiliates shall have any liability whatsoever in negligence or otherwise for any loss arising from any use of this presentation or its contents or otherwise arising in connection with this presentation or any other information or material discussed.

No representation is made as to the suitability of any issuance of a sustainable bond to fulfill environmental, social, sustainability, or other criteria required by prospective investors. Each prospective investor should determine for itself the relevance of the information contained or referred to in this framework or the relevant bond documentation regarding the use of proceeds and its purchase should be based upon such investigation as it deems necessary. Each prospective investor should be aware that projects may not satisfy the investor’s expectations concerning environmental, social, or sustainability benefits, and may result in adverse impacts.

Forward-Looking statements:

This Sustainable Financing Framework may contain certain forward-looking statements that are not historical facts or current facts. These forward-looking statements convey ADM’s current expectations or forecasts of future events. Forward-looking statements regarding ADM involve known and unknown risks, uncertainties and other factors that may cause ADM’s actual results, performance or achievements to be materially different from any future results, performances or achievements expressed or implied by the forward-looking statements in this Sustainable Financing Framework. Certain of these risks and uncertainties are described in the “Risk Factors,” “Forward-Looking Statements” and “Cautionary Note Regarding Forward-Looking Statements” sections of ADM’s annual report on

Form 10-K for the year ended December 31, 2020, ADM's quarterly reports on Form 10-Q for the quarters ended March 31, 2021, June 30, 2021 and September 30, 2021, and any of ADM's other applicable filings with the Securities and Exchange Commission. You are cautioned not to place undue reliance on the forward-looking statements contained herein, which are made only as of the date of this document. ADM does not undertake any obligation to publicly release any updates or revisions to any forward-looking statements to reflect the impact of events or circumstances that arise after the date the forward-looking statements were made.

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