



77 W. Wacker Drive
Suite 4600
Chicago, Illinois 60601

312-634-8100

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Statement on the California Transparency in Supply Chains Act and UK Modern Slavery Act

A critical component of ADM's efforts to enrich lives around the world is our commitment to creating positive impacts for the people throughout our value chain, and the communities in which we live and work. As part of that commitment, ADM is proud to disclose its efforts to eliminate slavery and human trafficking in product supply chains, in compliance with the California Transparency in Supply Chains Act of 2010 and the UK Modern Slavery Act of 2015.

ADM, its subsidiaries and its joint ventures strongly support human rights, and we expect our business partners to treat their employees with dignity and respect. We will never knowingly use suppliers who employ or exploit legally underage workers or forced labor, and will not condone such practices. In order to enforce these strict standards, we have implemented the following programs and policies related to our human rights commitments.

Corporate Programs and Policies

Governance

Our sustainability efforts are led by our Chief Sustainability Officer, who is supported by regional sustainability teams. Sustainability-related risks are reviewed quarterly through ADM's Enterprise Risk Management process. In 2019, our company's Board of Directors created a Sustainability and Corporate Responsibility Committee. This committee has oversight of sustainability and corporate responsibility matters, ensuring leadership and oversight at the highest level for these efforts. Sustainability updates and discussions are also regularly undertaken by the full Board.

Human Rights Policy

The ADM Human Rights Policy is approved by our Chief Executive Officer. The Policy:

- Is aimed at ensuring that our colleagues, suppliers and contractors respect workers' rights and comply with all applicable local, national and international laws governing working conditions.
- Contains strict prohibitions against the use of child labor, forced labor and bonded labor, and includes several other guidelines to protect workers from exploitation.
- Creates an implementation framework for identifying, assessing and addressing potential human rights risks in our supply chain.
- Requires appropriate action to be taken against suppliers if we learn that they do not satisfy our principles to respect human rights or misrepresent the conditions under which crops, goods or services have been produced.
- Specifies actions taken if a supplier does not demonstrate a good-faith effort to address issues in a timely manner; actions may include exclusion from new direct contracts or termination of our relationship.

- Includes a definition section which clearly outlines what child and forced labor mean, in accordance with International Labour Organization (ILO) standards. This enables ADM to clearly communicate our expectations and requirements.
- Has been translated into key languages and posted on our website, www.adm.com in recognition of our global supply chain.

Please refer to our [ADM Human Rights Policy Implementation Progress Report 2020](#) for an overview of our goals and plans as well as activities and actions related to respect for human rights and sustainability in 2019.

Training

ADM Colleagues receive regular trainings, reinforcing the duty to know and abide by our Company's core values, policies, procedures and guidelines. In addition, all new hires receive [Code of Conduct](#) training in the beginning of their employment.

Supplier Mandate

We expect all of our suppliers to:

- Know, understand, and follow laws and regulations that govern work done on our behalf.
- Never use child labor or forced or bonded labor.
- Refrain from using labor brokers who charge fees to job-seekers in exchange for employment.
- Have appropriate measures in place to ensure eligibility for employment.
- Compensate workers in accordance with all applicable local laws and regulations.
- Provide working conditions that comply with applicable laws and industry norms.

For more information view [ADM Supplier Expectations](#), [ADM Code of Conduct](#) and [Human Rights Policy](#).

Compliance Assurance

- Supplier Risk Assessment
 - In 2018 and 2019, ADM engaged a third-party to conduct a supplier risk assessment of human rights compliance in our supply chain. The analysis mapped the supply chain for key commodities based on inherent sourcing risks and business leverage insights to determine which segments have the highest risk profiles and which provide the greatest opportunity for ADM to influence positive change.
 - Assessment consists of three phases:
 - Phase 1 – Macro (country and commodity) level risks – this phase was designed to identify high-risk and high-leverage suppliers to assess in phase two. From a pool of over 300,000 suppliers, 15 commodities (based on procurement spend and stakeholder concern) sourced from more than 100 countries were assessed at a macro level.
 - Phase 2 – Micro (site/farm) level risks – using the results from phase one, eight commodities (corn, soy, wheat, palm, apples, macadamias, peanuts and pecans) in 20 countries from 1,132 suppliers were assessed.

- Phase 3 – Macro and micro analysis of the company’s newly acquired vanilla business.
- SEDEX Membership and Auditing
 - SEDEX (Supplier Ethical Data Exchange) is a not-for-profit organization dedicated to driving improvements in responsible and ethical business practices – including labor standards – in global supply chains.
 - Select ADM facilities register with SEDEX, maintain a self- assessment questionnaire and periodically host and complete 3rd-party SEDEX audits. The human rights portion of these audits includes assessments of facility conditions, child labor, forced/bonded labor, eligibility for employment, ethical recruitment, safety, discrimination, harassment and abuse, compensation, freedom of association and collective bargaining, and indigenous populations and communities.
 - In addition to tracking all audit outcomes and corrective actions, ADM reports on specific KPIs, in accordance with our Human Rights program. At the ADM facilities visited in 2020, there were no fees charged to job- seekers in exchange for employment and no collateral was taken in the form of money, identification or other personal belongings (without workers’ consent) as a condition of employment by ADM or contracted companies. Additionally, no human trafficking was observed.
 - In 2020, ADM leveraged its SEDEX membership to review select upstream suppliers’ SAQs, audits, and corrective action plan reports to further our supply chain risk assessment.
 - Based on our supplier risk assessment, in 2021 ADM will focus on reviewing Sedex SAQs and audits for suppliers of fruit and fruit products and suppliers in Asia.
- ADM Way Helpline
 - ADM hosts a 24 hour phone line, an email address, and a mailing address where violations of applicable laws, regulations, and our policies can be reported (anonymously where permitted by applicable law), promptly and thoroughly investigated, and handled as appropriate.
 - Anyone who violates applicable laws, regulations, or our policies will be subject to disciplinary action, up to and including termination.
- Public-Facing Grievance Mechanism
 - ADM has a [protocol](#) that outlines our workflow and response mechanism for addressing concerns and inquiries pertaining to deforestation or human rights violations in our supply chain.
 - The grievance mechanism is available to any party – internal or external – who wants to voice a concern by emailing responsibility@adm.com.
 - Allegations of violations of our Commitment to No- Deforestation or Human Rights Policy will be investigated according to the protocol, and results will be added to the [Grievances and Resolutions Log](#) on our website, www.adm.com.
 - In 2020, there were several allegations of human rights violations in our supply chains. Each was investigated and addressed in accordance with our protocol, and the outcomes were published in our log. The allegations were addressed as three reports:

- US Customs and Border Control – issuance of a Withhold Release Order for palm products based on allegations of human rights violations in the supply chain connected to two suppliers.
- Xinjiang Uygur Autonomous Region – multiple reports of human rights abuses across industries in the region.
- Global Witness Letter – list of 129 concerns and allegations of human rights violations in the palm industry.

Product-Based Programs and Policies

Soy

- **Responsible Soy**
Commitment to no exploitation of people or local communities as part of our effort to help develop a more sustainable supply chain for South American soy.
Business will not be conducted with suppliers who violate our soy supply chain policies repeatedly and refuse to take action to comply.
- **Signatory to the National Agreement to Eradicate Slave Labor in Brazil**
Commitment to refrain from negotiating with companies included in the “Lista Suja,” or “dirty list,” maintained by the Brazilian Ministry of Labor.
- **ADM Responsible Soy Standard**
Participating growers in Brazil face periodic audits that will assess their adherence to a broad set standards, including labor practices and legal compliance.
- **Member of the Round Table on Responsible Soy (RTRS)**
International organization whose certification system assures that soybeans originate from a process that includes responsible labor conditions.
- **Doing it Right (*Produzindo Certo*)**
Effort with Aliança da Terra, a not-for-profit sustainable farming group founded by farmers, to educate Brazilian farmers and emphasize fair labor conditions.
- **Our Commitment to No-Deforestation**
Our Commitment to No-Deforestation includes no exploitation of people and local communities in accordance with our Human Rights Policy.
In 2020, ADM continued to map our South American soybean supply chain and implement action plans that incorporate elements of our Human Rights Policy. In particular, supplier contracts in Brazil have been updated to include a clause prohibiting exploitation and human rights violations; furthermore, suppliers are being sent training documents which outline our Human Rights Policy and the No Exploitation portion of our Commitment to No-Deforestation.

Please refer to our [Sustainability Progress Tracker](#) and [2020 Soy Progress Reports](#) for more information on our progress on Sustainable Soy initiatives.

Palm

- Responsible Palm Oil
Commitment to no exploitation of people or local communities as part of our effort to help develop a more sustainable supply chain for palm oil, palm kernel oil and palm derivatives. Business will not be conducted with suppliers who violate our palm oil supply chain policies repeatedly and refuse to take action to comply.
- Member of the Roundtable on Sustainable Palm Oil (RSPO)
International organization that develops global certification standards for sustainable palm oil based upon an exacting set of criteria, including the fair treatment of workers. Efforts continue to increase the total amount of RSPO-certified products we offer.
- Our Commitment to No-Deforestation
Since 2015 ADM has been working with The Earthworm Foundation (EF), formerly The Forest Trust, a global environmental not-for-profit organization, to map our palm oil supply chain and create action plans that incorporate elements of our Human Rights Policy.
- Transformation Efforts in Sabah, Malaysia
In 2017, ADM supported a multi-stakeholder workshop, “Children in the Plantations of Sabah: Stakeholder Consultation,” co- convened by The Forest Trust, Wilmar, ADM, and Nestlé. Part of ADM’s funding support to the Earthworm Foundation (EF) went toward creating the Child Risk Assessment Framework(CRAF). CRAF aims to support palm oil producers in Malaysia to: identify potential risks faced by children in palm oil plantations; develop policies, procedures and interventions to minimize risk by responding in a timely manner to the identified potential risks; remediate adverse impacts discovered; review whether adequate measures have been taken to prevent, eliminate or reduce these risks; and make oil palm plantation sites and the surrounding areas a safe place to work and to live for children and for young people.
- Labor Assessment Builder Program - Colombia.
In this project, ADM supports the multi -stakeholder alliance of The Netherlands Oils and Fats Industry (MVO); Aceites S.A./Palmaceite S. A.; Colombian National Federation of Palm Growers (Fedepalma), and Solaridad, an international nonprofit. The project aims to build a more inclusive palm oil value chain between Colombian smallholders, processors and international market through the development and implementation of a step-by-step, data-driven tool that will enable farmers and processors to plan, monitor and verify the uptake of labor practices as defined by the Voluntary Sustainability Standards (VSS) and corporate policies. The project will train 500 producers in improving labor conditions, promoting free, prior and informed consent to strengthen the social dialogue, providing mobile technologies to assess and monitor labor practices and completing formalized labor contracts for workers, helping farmers meet VSS

Please refer to our [Sustainability Progress Tracker](#) as well as our [2020 Palm Progress Reports](#) for more information on our progress on Palm Oil initiatives.

Vanilla

In 2018, ADM acquired Rodelle Inc., a premium originator, processor and supplier of vanilla products with supply chains in Madagascar and Uganda. In 2019, ADM conducted supply risk analysis of those supply chains.

ADM sources vanilla through a vertically-integrated joint venture – Sahanala. The direct supply from grower to purchaser allows for a fair purchase price with more of the money going directly to the farmer. In addition, the Sahanala joint venture offers many community programs to help support the growers in the supply chain, including health offices, education support, and access to training and market information.

In 2020, ADM implemented a grower-level compliance verification program.

- ADM worked with a third party to develop a vanilla sourcing standard.
- Based on the developed standard, a self-assessment questionnaire (SAQ) was developed and implemented with 1,000 growers (25%).
- To validate the SAQ responses, ADM contracted with a third-party to conduct audits of a sample of growers and grower associations (63 audits).
- Summary SAQ and audit reports will be complete in early 2021 and response plans and corrective actions will be identified and implemented, as needed.

This statement constitutes ADM's disclosure pursuant to the California Transparency in Supply Chains Act of 2010 (Cal. Civ. Code § 1714.43). It also constitutes ADM's slavery and human trafficking statement pursuant to section 54(1) of the U.K. Modern Slavery Act 2015 for the financial year ending December 31, 2020.

This statement has been approved by the Sustainability and Corporate Responsibility Committee of the Board of Directors of ADM.



D. Cameron Findlay

Senior Vice President, General Counsel and Secretary