



Commitment to Anti-Corruption Compliance

ADM is committed to doing business with integrity. This means avoiding corruption in all forms, including bribery. We abide by all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act and local laws in every country in which we do business.

ADM has a robust anti-corruption program that includes a global Anti-Corruption Policy and other compliance procedures and controls designed to minimize the potential for corruption in ADM's global business dealings. The company raises awareness about anti-corruption laws in order to avoid inadvertent violations of the law and to enable early recognition and handling of potential issues. The anti-corruption program aims to protect the company from corruption risks in the context of:

- Commercial transactions with government entities and government employees;
- Commercial bribery and extortion;
- Hosting and gifting provided to government entities and government employees;
- Government and private tenders;
- Hiring current or former government employees;
- Due diligence on third parties with which ADM does business;
- Donations and contributions;
- Political contributions;
- Commercial bribery and extortion;
- Due diligence in the context of mergers, acquisitions, joint ventures and investments;
- Anti-corruption training;
- Anti-corruption auditing;
- Anti-corruption monitoring; and
- Maintaining accurate books and records.

ADM prohibits its officers, directors and employees, including its subsidiaries and majority-owned or controlled joint ventures and partnerships worldwide, from engaging in any form of bribery (i.e., directly or indirectly promising, paying, offering, giving, receiving, or authorizing a bribe) in order to improperly or in bad faith obtain a financial or other advantage personally or for the company. ADM also prohibits employees from directly or indirectly (through a third party) promising, paying, offering, giving, receiving or authorizing a bribe or anything of value to a government employee in order to:

- influence the government employee in his or her official capacity;
- induce the government employee to take any particular action or inaction;
- induce the government employee to use his or her influence to affect a government decision;
- assist the company in obtaining or retaining business; or
- assist the company in obtaining some other improper advantage.

Just as the company strictly prohibits the bribery of a government official or employee, ADM also prohibits the bribery of private persons or private entities. Under no circumstances may an employee or any third party acting on ADM's behalf offer, promise, give or pay anything of value to anyone in return for any improper advantage. ADM employees are also prohibited from accepting bribes from any governmental or non-governmental entity or employee.

ADM provides periodic training, guidance and awareness on anti-corruption compliance to its employees, joint ventures and suppliers. All employees are expected to understand and abide by the requirements set forth in ADM's anti-corruption program at all times.