

Human Rights Policy

Archer-Daniels-Midland Company (the "Company" or "ADM") is committed to respecting human rights in line with the [UN Guiding Principles on Business and Human Rights](#) (UNGPs). This Policy sets out our commitment, including the standards we apply to our company and expect of our business partners, and how we implement it through risk-based due diligence.

Introduction

About this policy

This policy was developed by ADM's sustainability team in close coordination with key senior leaders across our businesses, relevant departments and geographies, and includes input from a diverse range of external stakeholders, including civil society organizations and human rights experts.

It has been reviewed and authorized by the Chief Executive Officer and approved by the company's Sustainability & Technology Committee of the Board of Directors.

The Policy is embedded in, and informed by, other policies and standards that set out relevant requirements for ADM and our business partners, including our [Code of Conduct](#), [Supplier Expectations](#) and [Policy to Protect Forests, Biodiversity and Communities](#).

This is the fourth update since the original Policy was published in 2014. We aim to review and, where necessary, update the policy regularly.

About ADM

ADM is an essential global agricultural supply chain manager and processor, providing food security by connecting local needs with global capabilities. The Company is also a premier human and animal nutrition provider, as well as a leader in health and well-being products.

We partner with thousands of farmers around the world to purchase their crops and use our integrated global origination, logistics, and manufacturing network to transform many of those raw commodities into an expansive array of products serving the food, feed, fuel, and industrial and consumer products sectors.

ADM's purpose is to unlock the power of nature to enrich the quality of life. Our Human Rights Policy underpins this purpose by guiding responsible business conduct across our value chain.

Commitment

ADM's commitment to respect human rights is led by the UNGPs, which sets out this responsibility alongside the duty of states to protect human rights. Our approach is also guided by the [UN Global Compact Ten Principles](#) and the [OECD-FAO Guidance for Responsible Agricultural Supply Chains](#).

We recognize the human rights set out in the [United Nations Universal Declaration of Human Rights](#), and [International Labor Organization \(ILO\) Declaration on Fundamental Principles and Rights at Work](#).



Scope

Our commitment covers all ADM workers (including all employees, officers, directors, contract workers and agents of ADM, our divisions, and affiliates in all countries), individuals across our value chain, and those in the communities in which we and our business partners operate.

Our policy applies to our company, including all ADM workers. We expect our suppliers and business partners to respect human rights by adopting similar approaches to those set out in this policy, including by meeting the standards for our core human rights issues.

Standards

In applying these standards, circumstances may occur where national law and international human rights standards do not align. Where they are in conflict, we will comply with national law and explore how we can respect international human rights standards to the extent practicable.

- **Freedom of Association and Collective Bargaining** – We respect the right of our employees to join, form or refrain from joining or forming an organization such as a labor union, and without fear of reprisal, intimidation, or harassment. Where employees are represented by a legally recognized union, we support the establishment of a constructive dialogue with their freely chosen representatives. Where the right to freedom of association is restricted by law, or employees have decided not to appoint representatives, we support alternative means of engagement, such as direct and open communication between employees and management.
- **Forced or Compulsory Labor** – We prohibit all forms of forced labor, including involuntary prison labor, bonded labor, indentured labor and any forms of modern slavery or human trafficking in our operations and supply chains. Decisions regarding work must be based on free and informed choice. Terms and conditions of the employment shall be communicated at hire, and workers shall retain the right to terminate their employment. Workers must not be required to pay fees to secure or retain their employment, and conditions must not restrict their freedom of movement through practices such as the retention of identification documents, personal belongings, deposits or any kind of unlawful collateral. ADM does not tolerate the use of physical punishment, threats of violence, or other forms of abuse towards its workers.
- **Child Labor** – We prohibit child labor, defined as work that is hazardous to children's health, safety or morals, work that interferes with compulsory education or for which they are simply too young. We follow relevant ILO principles, including ILO Convention 138, taking into account applicable local laws and regulations.
- **Harassment and Discrimination** – We strive to maintain a safe, respectful, and inclusive working environment that is free of harassment, discrimination, and retaliation. We prohibit discrimination in our operations and supply chains on the basis of race, color, religion, sex, gender identity, national origin, citizenship, disability, age, sexual orientation, marital status, or any legally protected characteristic. These prohibitions extend to vulnerable groups, including migrant workers. We do not tolerate unwelcome conduct (sexual or non-sexual) - whether verbal, physical, or visual - that could be intimidating, offensive, demeaning, or create a hostile or abusive work environment.
- **Safe and Healthy Working Conditions** – We strive to provide a safe and healthy working environment and comply with applicable health and safety laws and regulations. We maintain systems and procedures designed to keep workers safe and protect them from occupational hazards, harassment and abuse.

- **Working Hours, Wages and Benefits** – We compensate employees in accordance with all applicable local laws and regulations including those related to minimum wage and overtime pay. Working hours must be in line with legal requirements and any collective bargaining agreements applicable to the location.
- **Land Rights** – We respect land-tenure right and the rights of indigenous and local communities, including to give or withhold their free, prior and informed consent (FPIC) to operations on lands to which they hold legal or customary rights. We expect all suppliers to uphold the principles of FPIC in their operations and business dealings.
- **Water** – We respect the right to access safe and clean drinking water and sanitation in our operations and supply chains and acknowledge the [UN Resolution on the Human Right to Water](#).

Human Rights Defenders

ADM does not tolerate threats, attacks, or retaliation against any individual or organization that raises human rights concerns in good faith, and strive to protect human rights whistleblowers and complainants. We also believe that open and ongoing dialogue with human rights defenders, community spokespersons, and other stakeholders is critical to informing and strengthening programs.

Implementation

Approach

ADM takes a risk-based approach to human rights due diligence to identify, prevent, mitigate, and account for how it addresses adverse impacts across its value chain. Our approach is supported by our efforts to embed human rights into our own operations and those of our business partners, and is informed by ongoing stakeholder engagement, including with affected stakeholders. We measure the effectiveness of our approach, and the sustainability team regularly communicates progress to the Sustainability and Technology Committee of the Board of Directors and publishes an annual sustainability report, available at [adm.com](#). We strive for continuous improvement, using insights gained from our practices to refine and enhance our policies, standards and their implementation.

Management and Governance

The sustainability team, led by the Chief Sustainability Officer, owns the policy and facilitates its delivery by working with relevant departments, including Operations, Supply Chain and Procurement, Origination, Environmental Health and Safety, Compliance and Legal, to evaluate risk, identify and deliver targeted and measurable actions to address those risks, and to provide governance and oversight.

The Sustainability and Technology Committee of the Board oversees the Company's objectives, goals, strategies, and activities relating to sustainability, including for human rights. The Company's Chief Sustainability Officer, Senior Vice President of Global Operations, and Chief Technology Officer regularly attend committee meetings as management representatives. The Executive Council of ADM, the Company's highest strategic and operational body, provides close supervision of the Company's Environmental, Social and Governance (ESG) efforts and in-depth review of sustainability issues.



Due Diligence in Practice

As an essential global agricultural supply chain manager and processor, our due diligence program encompasses a vast range of commodities and ingredients across our global value chain. While somewhat dependent on business partners, local governments and other stakeholders, we respect human rights and are committed to the following steps:

- **Embedding human rights** - ADM seeks to embed human rights with colleagues and business partners including by: taking a cross-functional approach across business units, departments and geographies to delivering due diligence; raising awareness, for example by making this policy and other relevant documents available in multiple languages on our website; and providing training for those playing a key role in delivery.
- **Identifying and prioritizing potential and actual adverse impacts** - ADM regularly evaluates its operations and supply chain to identify and prioritize potential and actual human rights impacts. We take a salient risk assessment approach, based on severity and likelihood to identify and prioritize our most significant human rights issues.
- **Taking action on potential and actual adverse impacts** - ADM takes appropriate measures to address adverse impacts. Our approach is based on the expectations set out in the UNGPs, including on our level of involvement to the impact, and it may include the following actions: traceability back to the origin of complex commodity supply chains; a formal procedure for [managing supplier non-compliances](#), use of credible third-party certification schemes; capacity building for suppliers in high-risk geographies; third party audit programs to address issues at specific sites and business partners; and collaborative action with peers, business partners and others.
- **Measurement and Communicating Progress** – We measure the progress of our programs to assess performance and identify changes to our approach and activities. We communicate more details on our approach and on our progress to meet our policy through our website page on [ADM Human Rights](#), which also includes related policies and reports. ADM also maintains a [Grievance and Resolution Log](#) to show concerns raised and progress made in addressing them.
- **Grievance and Remedy** – ADM seeks to enable remedy and address grievances in line with the responsibilities set out in the UNGPs. We investigate all allegations of non-compliance with our policies in accordance with established protocols and procedures, addressing incidents on a case-by-case basis to ensure appropriate resolution.

Stakeholders are encouraged to contact the [ADM Way Helpline](#) where they have concerns that ADM's commitments and policies, including for human rights, are not being met. ADM does not tolerate retaliation against anyone who has made a good faith report of possible misconduct. Where local law permits, concerns can be reported anonymously. ADM also has a 'Grievance and Resolution' channel to raise any concerns and report issues covered by our Policy to Protect Forests, Biodiversity and Communities and Human Rights Policy, which can be submitted to: responsibility@adm.com.

- **Stakeholder Engagement** – We regularly engage with rights holders including communities and workers, and other stakeholders such as subject matter experts and civil society to inform our human rights approach and specific activities and issues.

