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ADM.COM

March 28, 2019

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

Archer Daniels Midland Company 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.

Archer Daniels Midland Company (ADM), its subsidiaries and its joint ventures respect 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**

**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
  - ADM engaged ELEVATE 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 two phases:
    - 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.
    - Micro (site/farm) level risks– using the results from phase one, ELEVATE is assessing eight commodities (corn, soy, wheat, palm, apples, macadamias, peanuts and pecans) in 20 countries from 1,132 suppliers.
    - Results from this two-phase assessment will be completed in 2019, and form the basis of an action plan for risk mitigation.
  
- 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 3<sup>rd</sup>-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 2018, 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.

- 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](mailto: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](http://www.ADM.com).
  - In 2018, there were four allegations of human rights violations in our palm supply chain. Each was investigated in accordance with our protocol, and the outcomes were published in our log.
  
- 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 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, ADM.com in recognition of our global supply chain.

Please refer to our [ADM Human Rights Policy Implementation Reports](#) and [Corporate Sustainability Report](#) for an overview of our goals and plans as well as activities and actions related to respect for human rights and sustainability in 2018 and 2017.

## Training

ADM Colleagues receive regular [Code of Conduct](#) training reinforcing the duty to know and abide by our Company's core values, policies, procedures and guidelines.

In 2018, ADM updated its internal training for new hires and prepared mandatory training for the Board of Directors and employees of new acquisitions to include simplified and standardized information on our Human Rights Policy that will be used in all geographies.

## **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 2018, ADM continued to map our South American soybean supply chain and create 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 were 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](#) 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

Working with 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.

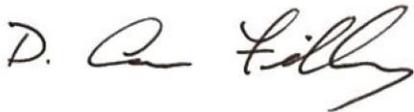
- Transformation Efforts in Sabah, Malaysia

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. Leveraging the learnings and success of the workshop, ADM supported two follow-up projects developed by The Forest Trust to catalyze industry transformation aimed at disinvolvement of children in plantations. The first project was related to socialization of

the Children in Plantations of Sabah Report to government agencies and NGOs in Sabah, Malaysia. The second project was mapping of the services available for vulnerable children in the plantation of Sabah, Malaysia by establishing a database of services provided by NGOs and other agencies. These projects expand public dialogue beyond the initial consultation, raising awareness and stimulating action across the industry.

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

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, 2018.

A handwritten signature in black ink, appearing to read "D. Cameron Findlay". The signature is fluid and cursive, with the first name "D." and last name "Findlay" clearly distinguishable.

**D. Cameron Findlay**

Senior Vice President, General Counsel and Secretary