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August 20, 2018

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

The California Transparency in Supply Chains Act of 2010 and the UK Modern Slavery Act of 2015 strive for the elimination of slavery and human trafficking in product supply chains and require certain companies to disclose efforts to achieve those goals.

ADM companies (ADM) respect human rights and expect our business partners to also 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. We implement the following programs and policies related to our human rights commitments.

### **Corporate Programs and Policies**

#### **Supplier Mandate**

We expect all 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.

#### **Compliance Assurance**

- **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 in global supply chains, including labor standards.
  - Select ADM facilities register with SEDEX and periodically host and complete SEDEX audits. The human rights portion of these audits include assessment 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. At the ADM facilities visited in 2017, 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.
  
- Our Commitment to Respect for Human Rights
  - Aimed at ensuring 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.
  - Appropriate action taken against suppliers when 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.
  - 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.
  - Our recently updated Human Rights Policy now includes a definition section which more clearly outlines what child and forced labor mean, in accordance with the International Labour Organization (ILO) definitions. This enables ADM to more clearly communicate our expectations and requirements.
  - In recognition of our global supply chain, the updated Human Rights Policy has been translated into key languages and posted on our website.

Please refer to the ADM [Human Rights Policy Implementation Reports](#) for H1 and H2 of 2017 and ADM [2017 Corporate Sustainability Report](#) for the overview of our goals and plans as well as activities and actions taken by ADM with respect to human rights and sustainability related topics in 2017.

### Training

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

## **Product-Based Programs and Policies**

### Soy

- 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

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

In 2017 ADM collaborated with The Forest Trust, a global environmental not-for-profit organization, to map our soybean supply chain and create action plans that incorporate implementation elements of Our Commitment to Respect Human Rights. As a result of this cooperation, TFT developed two documents related to the No Exploitation portion of our policy. One of them is a document to raise supplier awareness of the most critical issues related to No Exploitation and Respect for Human Rights; the other is a consultation guide for country elevators sourcing soy in regions where there are social conflicts.

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 their 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 implementation elements of Our Commitment to Respect Human Rights.

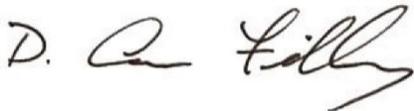
- Children in Plantations Workshop in Sabah, Malaysia

As a part of our Commitment to No-Deforestation, ADM supported the H2 2017 workshop “Children in the Plantations of Sabah: Stakeholder Consultation,” co-convened by TFT, Wilmar, ADM, and Nestlé in September 2017. The workshop offered an opportunity for suppliers to engage in dialogue on the challenges and solutions regarding children in plantations. The workshop was successful with good engagement from both supply chain actors and industry experts. Approximately 50 participants attended, including directors, managers, and executive level staff from small, medium, and large plantations and mill companies in Sabah.

Attendees were informed of the risks related to children in plantation work and possible strategies to reduce the participation of children, including how to strengthen access to education.

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, 2017.



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