



## Human Rights Disclosure 2025

### Contents

I. Introduction.....	1
II. ADM Global Operation and Supply Chain .....	2
III. Sustainability Governance.....	3
IV. Policy Commitment .....	3
V. Sustainability Due Diligence .....	6
VI. Assessing Risks and Impacts in ADM’s Supply Chain .....	7
VII. Implementing Effective Actions .....	8
VIII. ADM’s Remediation of Human Rights Issues .....	11
IX. Attestation.....	13
X. Appendix .....	14

### I. Introduction

Archer-Daniels-Midland Company and its subsidiaries (the "Company" or "ADM") unlocks the power of nature to enrich the quality of life. The Company is an essential global agricultural supply chain manager and processor, providing food security by connecting local needs with global capabilities. ADM is also a premier human and animal nutrition provider, as well as a leader in health and well-being products. Around the globe, ADM's expertise and innovation are meeting critical needs from harvest to home. Learn more at [www.adm.com](http://www.adm.com).

ADM is committed to upholding and advancing human rights throughout its operations and supply chains, guided by the principles set out in our Human Rights Policy. The Company expects its business partners to uphold similar commitments. ADM has been a signatory to the United Nations Global Compact since 2016 and has embedded human rights commitments into its policies and management systems through an integrated due diligence process that identifies and assesses risks, implements mitigation and corrective actions, provides access to remedy when needed, and reports on progress through ADM’s [corporate reports](#).

To further transparency, ADM discloses its efforts to eradicate modern slavery and human trafficking in its global supply chains, in compliance with the California Transparency in Supply Chains Act 2010, the United Kingdom’s Modern Slavery Act 2015, the Australian Modern Slavery Act 2018 and the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 (the “Acts”) promulgated thereunder, for the calendar year ended December 31, 2025. In some jurisdictions, applicable laws require the inclusion of additional, country-specific information. Such details are available in the Appendix under the country-specific disclosures section.





## II. ADM Global Operation and Supply Chain

ADM is a truly global company of approximately 41,496 employees working together to achieve extraordinary results. The Company's operations are organized, managed, and classified into three reportable segments: Ag Services and Oilseeds, Carbohydrate Solutions, and Nutrition. Each of these segments is organized based upon the nature of products and services offered:

- The Ag Services and Oilseeds segment includes global activities related to the origination, merchandising, transportation, and storage of agricultural raw materials, as well as the crushing and processing of oilseeds, including soybeans and soft seeds such as cottonseed, sunflower seed, canola, rapeseed, and flaxseed. The segment produces and markets vegetable oils and oilseed protein meals used by food, feed, energy, and industrial customers. Crude and partially refined vegetable oils are sold to third parties, including renewable diesel manufacturers, or further processed into salad oils, margarine, shortening, biodiesel, glycols, and other food and industrial products. Oilseed protein meals are primarily sold as ingredients for commercial livestock and poultry feeds. The segment is also a major supplier of peanuts and peanut-derived ingredients and manufactures cotton cellulose pulp in North America for chemical, paper, and other industrial markets. In addition, its integrated grain sourcing, handling, and multimodal transportation network supports global import, export, and distribution activities and provides essential services to customers and the Company's processing operations. The Company also engages in various structured trade finance activities through this segment to leverage its global trade flows.
- The Carbohydrate Solutions segment engages in corn and wheat wet and dry milling and related processing activities. The segment converts corn and wheat into products and ingredients used in food and beverage applications, including sweeteners, starches, syrups, glucose, wheat flour, and dextrose. Dextrose and starches are also utilized as feedstocks in downstream processes, including fermentation to produce alcohol and other food and animal feed ingredients. Ethanol is produced for use as an octane enhancer and oxygenate in gasoline. In addition, the segment produces distillers' grains, corn gluten feed, and corn gluten meal for use as animal feed ingredients. Corn germ, a by-product of wet milling, is further processed into vegetable oil and protein meal, and citric acids are produced for food and industrial applications. The Carbohydrate Solutions segment also advances carbon capture and sequestration and other emissions-reduction initiatives, positioning the business to support lower-carbon operations and the growing use of plant-based alternatives to fossil-derived materials.
- The Nutrition segment serves various end markets including food, beverages, and nutritional supplements for humans, and complete feed, feed premix and additives, pet food and pet treats for livestock, aquaculture, and pets. The segment engages in the creation, manufacturing, sale, and distribution of a wide array of ingredients and solutions including plant-based proteins, flavors and colors derived from nature, flavor systems, emulsifiers, soluble fiber, polyols, hydrocolloids, probiotics, prebiotics, postbiotics, enzymes, botanical extracts, and other specialty food and feed ingredients and systems. The Nutrition segment also includes activities related to the procurement, processing, and distribution of edible beans, the processing and distribution of formula feeds and animal health and nutrition products and the manufacture of contract and private label pet treats and foods.



### III. Sustainability Governance

The Sustainability and Technology Committee of the Board actively oversees the Company's objectives, goals, strategies, and activities relating to sustainability. The Committee also oversees the Company's compliance with sustainability laws and regulations, assesses performance relating to industry benchmarks, and assists the Board of Directors in overseeing the Company's operations as a sustainable organization and responsible corporate citizen in order to enhance shareholder value and protect ADM's reputation. 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.

Furthermore, regional sustainability teams, along with the corporate sustainability team, support the Chief Sustainability Officer to drive sustainability efforts in the Company's facilities and supply chains around the world. ADM's sustainability efforts are also supported by functional expertise throughout the Company such as in Operations and Utilities, Supply Chain and Procurement, Agricultural Services and Oilseeds, and Environmental Health and Safety. Further details on ADM's governance are available at [Governance at ADM](#).

### IV. Policy Commitment

#### A. ADM's Policies

At ADM, the [Code of Conduct](#) is fundamental to everything we do. We believe in making a positive impact and leading by example, setting a global standard for good business that other companies in our industry will follow. Building on this principle, the Code of Conduct illustrates what doing business with integrity means to us, no matter where we are in the world.

Respect for human rights is an integral part of our ambition to make a positive impact in the global community. The [Human Rights Policy](#) outlines how we uphold and promote the rights of our employees, those within our value chain, and in the communities in which we operate. We strive to promote human rights in accordance the United Nations Declaration of Human Rights and the Fundamental Principles and Rights at Work of the International Labour Organization (ILO). The Human Rights Policy addresses, though is not limited to, the following key areas:

- **Forced, Bonded, or Compulsory Labor** - ADM prohibits the use of all forms of forced labor, including bonded labor, indentured labor, and child labor in our operations and our supply chains. Employees should not be charged fees in exchange for employment or have collateral in the form of money, identification or other personal belongings held – without workers' consent – as a condition of employment. The use of physical punishment, violence or other forms of abuse will not be tolerated.



- Child Labor - ADM prohibits 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. All workers in our operations and our supply chain must meet the minimum age to work as defined by ILO Convention 138 as well as applicable local laws and regulations.

In addition, ADM has established [Supplier Expectations](#) that set clear standards expected for suppliers to follow in areas such as business integrity, labor conditions and human rights, and environment and land rights. We expect all our suppliers to do business fairly, ethically and in compliance with all applicable local laws and regulations.

All ADM colleagues are expected to adhere to the commitments set out in our Human Rights Policy. Allegations of violations will be investigated, and confirmed violations may result in disciplinary action, up to and including termination of employment.

Furthermore, if any supplier, contractor, or business partner fails to adhere to the Supplier Expectations' commitments, or misrepresents the conditions under which crops, goods, or services have been produced, ADM will take appropriate action. We expect cooperation with investigations of alleged violations and disclosure of remediation measures. If the party does not demonstrate a good-faith effort to address issues in a timely manner, actions may include exclusion from new direct contracts and/or termination of the relationship.

## B. Embedding ADM's Policies Across the Organization

ADM makes its corporate policies accessible to all colleagues and stakeholders. Employees can access global and regional corporate policies through our internal central resource, while the public can view them at [www.adm.com](http://www.adm.com) by searching for 'policies'. ADM's policies are typically translated into key languages to ensure broad understanding across our global supply chains. Additionally, our Supplier Expectations may be communicated at the regional and business unit levels through procurement contracts, purchase orders, quality manuals, or public reports.

ADM integrates training on its corporate policies into every stage of employment. New colleagues complete Code of Conduct training during the onboarding to understand ADM's shared values and expected behaviors. To reinforce these principles, ADM provides regular refresher trainings on the Code of Conduct, reflecting the Company's ongoing commitment to responsible business practices.

In 2025, 39,548 ADM colleagues, including global category buyers and supply chain management planners with responsibility for supply-chain decisions, completed the sustainability training. The training was designed to deepen understanding of why sustainability, one of the key pillars of ADM's growth strategy, is essential to our business. The training highlights how ADM integrates its sustainability goals and commitments into all aspects of its operations. It also addresses ADM's human rights programs, including our commitment to human rights protection and sustainability due diligence.



During the reporting year, ADM partnered with a Brazilian non-profit organization specializing in local development, applied research, and public policy advocacy to drive positive change in supply chains and communities. Together, we developed a three-hour course on human rights and sustainability due diligence tailored specifically for our procurement colleagues in Brazil. The program reached 58 participants in the first cohort and 52 in the second session.

### C. Enforcing ADM's Policies in Our Operations

To ensure that ADM processing sites uphold our Human Rights Policy, we conduct regular third-party audits focused on labor standards, health and safety, environmental practices, and business ethics. In 2025, ADM carried out 57 announced and semi-announced audits across 11 countries: Brazil, Bulgaria, Canada, the Czech Republic, Germany, India, the Netherlands, Poland, Turkey, the United Kingdom, and the United States of America. Beginning in the fourth quarter of 2025, ADM initiated a transition from fully announced audits to semi-announced audits, allowing auditors to arrive without prior notice within a defined audit window, typically two to three weeks, to strengthen the effectiveness of audit oversight.

These audits assessed the working conditions of 7,969 workers, including ADM employees and on-site service providers such as security, cleaning and cafeteria contractors, as well as temporary and staffing workers. To ensure a credible evaluation, auditors conducted 900 confidential worker interviews. Where sites had union representation, a union leader participated in the audit process, promoting transparency and providing an opportunity for open feedback on workplace conditions.

When findings were identified, a cross-functional committee, including site management such as the operations manager, environment, health and safety manager, and human resources manager, supported by the sustainability team, was convened. Progress on corrective actions was tracked and reported to the Sustainability and Technology Committee of the Board. Notably, no instances of child labor or forced labor were identified.

ADM recognizes that even strong training programs and third-party audits may not fully eliminate the risk of policy violations. When issues arise, we investigate and implement corrective actions. In 2024, independent media reports linked ADM to the use of involuntary prison labor in the United States. In response, we initiated an internal review to evaluate whether a rehabilitation program at two of our facilities aligned with International Labour Organization (ILO) guidelines for voluntary prison labor.

Although all program participants received the same training, safety equipment, and pay as other employees performing similar activities, we could not confirm full alignment with ILO standards. In keeping with our human rights commitments, we began phasing out the program, refraining from accepting new participants while safeguarding current workers. We continue to monitor working hours and compensation to ensure compliance with our policies, and we offer full-time employment opportunities upon release. In fact, in 2025, ADM hired three former participants from the rehabilitation program. Our investigation traced the program's origin to a company acquisition, and we have since strengthened our M&A due diligence to prevent reoccurrence.



## V. Sustainability Due Diligence

### A. Governance

The sustainability team holds primary accountability for the program coordination and risk prioritization, applying analytics to data provided by Procurement, Commercial Origination, and Trading to identify and evaluate higher-risk areas and suppliers. Mitigation actions are formulated jointly with supplier-facing functions and subject matter experts to ensure targeted and measurable actions. Compliance and Legal functions provide governance oversight, ensuring alignment with internal protocols and applicable regulations. This structured approach reinforces accountability and continuous improvement in sustainability performance.

### B. Due Diligence Framework

ADM's sustainability due diligence process is an integrated, cross-functional framework aiming to avoid causing or contributing to adverse impacts on people, the environment and society by identifying, preventing, mitigating, and accounting for potential and actual sustainability issues across our supply chains. We aim to align our due diligence program with the United Nations Guiding Principles on Business and Human Rights and the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Business Conduct. ADM's sustainability due diligence framework operates through the following steps:

- Assessing Risk and Impact - Guided by policy commitments, ADM systematically identifies, evaluates, and prioritizes potential and actual sustainability risks across its operations and business relationships. The risk assessment is conducted internally, drawing on more than 20 indices from leading research institutions and risk management vendors.
- Implementing Effective Actions - Based on the findings of the risk and impact assessment, ADM proceeds to implement effective actions to prevent and mitigate adverse impacts, integrating these measures into relevant decision-making and operational processes.
- Tracking and Monitoring - ADM monitors and evaluates the progress of corrective actions, collaborative actions and the effectiveness of its sustainability programs.
- Communicating and Reporting - ADM commits to maintaining regular communication and reporting on its sustainability performance, promoting transparency and fostering sustainable practices across the industry.

ADM's due diligence program operates at a global level and continues to be strengthened across regions and product lines. As with any large-scale program, levels of maturity may naturally vary, and we are committed to ongoing enhancement. The program will continue to evolve as we refine our practices and incorporate insights from emerging supply chain due diligence legislation.



## VI. Assessing Risks and Impacts in ADM's Supply Chain

### A. ADM Sustainability Salient Risk

In 2023, ADM partnered with a United States–based non-profit organization recognized as a leading center of expertise on the UN Guiding Principles on Business and Human Rights to conduct a comprehensive assessment of its sustainability salient risks. The assessment reviewed the severity of potential risks, considering their scale, scope, and irremediability, as well as the likelihood of their occurrence. Through this process, ADM gained a deeper understanding of how its activities and business relations may negatively affect communities, identifying the salient risks outlined below:

- Child Labor - Work performed by child that is hazardous to children's health, safety or morals, that interferes with compulsory education or for which they are simply too young.
- Forced Labor - Work performed involuntarily under the threat of a penalty, including practices such as debt bondage, withheld documents, recruitment fees, or abuse.
- Gender Discrimination - Unequal treatment or opportunities based on gender within the workplace or labor market.
- Health and Safety - Serious violations of occupational health and safety standards that endanger workers' well-being.
- Impacts on Communities - Adverse effects on the rights, livelihoods, or environments of local communities resulting from business activities.
- Just Transition in Agriculture - Shifts toward sustainable agricultural practices that may unfairly disadvantage workers or communities.
- Living Wages - Compensation that fails to meet basic needs.

ADM understands that sustainability risks evolve over time, and we continually review the risks outlined above through ongoing research and stakeholder feedback, including insights gathered from our public-facing grievance mechanisms.

### B. Prioritizing Sustainability Risks

ADM conducts regular risk assessments across its ingredient and commodity supply chains. We integrate insights from our salient risk analysis into more detailed, quantitative assessments that measure supplier and supply chain risks, enabling prioritization and targeted action.

In 2025, as part of our ingredient risk assessment, we evaluated more than 6,000 ingredient supply flows, defined as suppliers by ingredient type. Furthermore, we refined the results of the commodity supply chain risk



assessment previously conducted in 2024. The earlier assessment analyzed social risks associated with specific commodities, covering 99% of ADM's total sourced commodity volume. Both the ingredient and commodity risk assessments were conducted through three distinct phases:

- Phase 1: Product Risk - This phase evaluates risks based on the social risk associated with the production, such as workforce profile and production characteristics.
- Phase 2: Geography Risk - Building on the findings from phase one, ADM uses over 20 indices, aligned with the identified salient risks, to evaluate country-level risk. Among these are the Children's Rights in the Workplace Index (UNICEF and Global Child Forum) and the Global Slavery Index (Walk Free Foundation).
- Phase 3: Leverage - Leveraging insights from phases one and two, this phase focuses on prioritizing higher-risk suppliers and supply chains based on ADM's level of leverage with each supplier or supply chain.

The following three areas of our global business have been identified as priorities for sustainability risk management, due to exposure to social risks, such as child and forced labor.

Commodities:

- South American Soybeans - Although ADM does not own or operate soybean farms, we recognize our role in influencing sustainable practices across the soybean value chain. ADM sources soybeans from both direct suppliers (farmers) and indirect suppliers (aggregators) in Brazil, Paraguay, Argentina and Uruguay. The soybeans are either exported in their raw form or further processed into a range of food, feed, energy, and industrial products, including vegetable oil, protein meal, biodiesel, and other value-added solutions.
- Global Palm - Although ADM does not own or operate palm oil plantations or mills, we recognize our role in influencing sustainable practices throughout the palm value chain. ADM sources palm oil and palm kernel oil from Southeast Asia and Latin America. These products are further processed to create tailored solutions for a variety of applications, including baked goods, confectionery, and frying.

Ingredients:

- Global Ingredients - ADM sources a diverse range of ingredients, such as oils, fruits, vegetables, nutritional additives and supplements, to create and manufacture ingredient solutions for food and feed industries. About 25% of the over 6,000 ingredient supply flows assessed may carry higher sustainability risks.

## VII. Implementing Effective Actions

Based on our risk prioritization and understanding of ADM's position within higher-risk supply chains, we have been developing and implementing action plans aimed at preventing or mitigating actual and potential adverse impacts on people, the environment, and society:



#### A. South American Soybeans

- Traceability – ADM has achieved and maintained full traceability since 2022, covering direct suppliers at the farm level and indirect suppliers at a minimum to the first aggregation-point level. We have partnered with specialized firms utilizing GIS technology (satellite imaging) to cross-reference the planted areas of our direct suppliers in high-risk regions. This process ensures that the soy we source complies with our policies.
- Certification – ADM’s soybean product portfolio includes ADM’s Responsible Soybean Standard (ARS) certified soybean. The voluntary certification program promotes sustainable soybean farming through legal compliance, social and community protection, environmental stewardship, good agricultural practices, and traceability. Through annual inspections, ADM ensures that suppliers adopt practices that protect biodiversity, uphold fair labor standards, and comply with national laws. We also offer Biomass Biofuels Voluntary Scheme (2BSvs), International Sustainability & Carbon Certification (ISCC) and Round Table on Responsible Soy (RTRS) certified soybeans to our global customers.
- Management Systems – ADM employs a systematic approach to monitoring the sustainability performance of its suppliers. To strengthen our due diligence, we have integrated the “Lista Suja”, a regularly updated public registry compiled by the Brazilian government that identifies entities associated with forced labor or degrading working conditions, into our internal monitoring systems. Suppliers identified through this process that do not implement effective corrective actions are suspended from our supply chain. ADM is a signatory to the National Agreement to Eradicate Slave Labor in Brazil and we are committed to refraining from negotiating with companies included in the “Lista Suja”.
- Collaborative Action – ADM supports Territorial Coalizão Pará, a project led by Childhood Brazil that aims to prevent and combat the sexual exploitation of children and adolescents in multimodal supply chain hubs in Northern Brazil, where ADM operates a soybean export flow. Furthermore, ADM engages with InPACTO, a non-profit aiming to prevent and eradicate slave labor and child labor, and to promote decent working conditions across production chains in Brazil. Through our participation in InPACTO’s regular meetings, which convene stakeholders from the private sector, public sector, and broader Brazilian society, we gain valuable insights into social challenges within Brazilian supply chains and the progress made across various sectors in developing action plans to advance good practices. Every two years, ADM reports its progress on initiatives to promote an agricultural supply chain free from forced and child labor to InPACTO and receives feedback on areas for improvement as well as recognition of effective practices.
- Memberships – ADM is also a member of the Round Table on Responsible Soy (RTRS), an international organization whose certification system ensures that soybeans are produced in accordance with responsible environmental and social standards. In addition, ADM actively participates in the Sustainability and Human Rights Commission of the Brazilian Association of Vegetable Oil Industries (ABIOVE), contributing to the advancement of responsible industry practices in Brazil.



## B. Global Palm

- Traceability – ADM has achieved and maintained traceability for the majority of its sourced crude palm oil and palm kernel oil to mill level and plantation levels. The exact figures are reported annually in our sustainability reports, available at [corporate reports](#).
- Certification – ADM’s palm product portfolio includes Roundtable on Sustainable Palm Oil (RSPO) certified crude palm oil and palm kernel oil. We offer both segregated volumes, sourced exclusively from certified farms and kept separate from non-certified palm products to ensure full traceability, and mass balance volumes, which combine certified and non-certified palm products but maintain tracking of certified content.
- Management Systems – ADM continuously monitors the compliance of its direct palm suppliers with the Company’s sustainability requirements. To strengthen oversight, ADM partners with a third-party verification body to assess potential deforestation linked to mills in its supply chains through satellite monitoring. The assessment also reviews suppliers’ sustainability commitments and their implementation mechanisms, including supplier’s human rights policy, sustainability due diligence programs and public grievance logs.
- Collaborative Action – ADM participates of The Palm Oil Collaboration Group, contributing to the advancement of the No Deforestation, No Expansion on Peat and No Exploitation (NDPE) Implementation Reporting Framework (IRF) to drive progress on reporting against NDPE criteria. We also recognize the Indonesian Sustainable Palm Oil / Malaysian Sustainable Palm Oil as regulatory framework and an entry point to NDPE IRF framework.
- Memberships – ADM is a member of the Roundtable on Sustainable Palm Oil (RSPO). RSPO is an international organization that develops global certification standards for sustainable palm oil based upon an exacting set of criteria, including the fair treatment of workers. As market demand drives the volume of certified products, we remain committed to continuously evaluating our product offerings to meet the demand for RSPO-certified products.

## C. Ingredient Supply Chain

- Traceability – ADM’s internal tools enable effective tracking and management of ingredient sourcing, including visibility into country of origin and supplier detailed information.
- Certification – ADM offers a range of certified ingredients, drawing on our expertise in sourcing certified tropical fruits, tea, sugar, and cocoa products through globally recognized sustainability standards, including Fair Trade and the Rainforest Alliance.
- Management System - We onboard suppliers identified as medium or higher risk through our risk assessment process in platforms that enable ADM to continuously monitor the progress of our suppliers on responsible sourcing audits and self-assessment questionnaires (SAQ), providing visibility into our supply chain’s compliance with labor



standards, health and safety, environment and business ethics best practices. ADM is connected to over 1,000 supplier's processing sites and warehouses on the Supplier Ethical Data Exchange (Sedex), spanning 66 countries. In addition, ADM recognizes other sustainability assessment schemes and certifications, including Ecovadis.

- Collaborative Action - ADM works in partnership with civil society organizations and the private sector to promote initiatives around the world that advance food security, sustainability, and health and well-being. In 2025, ADM partnered with a non-profit organization in Peru to restore local ecosystems and enhance household food security for 300 families across four rural communities that cultivate ingredients used in our natural color portfolio. Through this initiative, ADM is supporting the establishment of 12 community biogardens, 300 household mini-poultry units, and the reforestation of 20 hectares with native species, contributing to both environmental conservation and community resilience. This partnership builds on ADM's long-term engagement in these communities. Previously, ADM supported projects to improve access to clean drinking water and sanitation facilities in local schools, directly benefiting nearly 1,000 students across six schools.

We engage smallholder farmers across our value chain through capacity-building programs that support training, equitable business opportunities, and community livelihoods. To date, we have not identified any loss of income to vulnerable families resulting from these efforts. For more information on our sustainability efforts, please visit our [sustainability website](#).

### VIII. ADM's Remediation of Human Rights Issues

When ADM's operations or supply chain cause or contribute to an adverse human rights or environmental impact that cannot be prevented or mitigated, ADM provides access to remediation.

#### A. Public-Facing Grievance Mechanism

We have a protocol that outlines our workflow and response mechanism for addressing concerns and inquiries pertaining to deforestation or human rights violations in our operations or supply chains. 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) or through our [ADM Way Helpline](#).

Allegations of violations of our Policy to Protect Forests, Biodiversity and Communities or Human Rights Policy will be investigated according to the protocol, and results will be added to the [Grievances and Resolutions Log](#).



B. ADM Way Helpline

We host a 24-hour phone line, an email address, and a mailing address through which violations of applicable laws, regulations, or our policies can be reported. ADM employees, on-site service providers, and workers in our supply chains may raise concerns anonymously, where permitted by applicable law. Reports are promptly and thoroughly investigated and addressed as appropriate. For more information, refer to ADM Way Helpline [Frequently Asked Questions \(FAQ\)](#) page.

C. Remediation

ADM engages with its stakeholders on an ongoing basis to monitor for forced or child labor risk factors and to appropriately remediate any issues or material risks that are identified. Remediation is undertaken in a manner that is sensitive to the risk of adverse income consequences to vulnerable families that can result from broader remediation measures.

In 2025, supplier audits indicated two instances where workers paid fees that could be interpreted as recruitment-related charges. The cases involved a service provider engaged by one of ADM's direct suppliers. After becoming aware of the issue, ADM contacted the supplier to clarify the circumstances and confirm the corrective actions taken. The supplier reported that affected workers were reimbursed through a one-time payment. This reimbursement was verified by an independent third-party auditing firm. The service provider was subsequently reminded of the supplier's zero-fee recruitment policy and informed of the supplier's right to conduct third-party assessments to monitor ongoing compliance.





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## IX. Attestation

This statement represents a joint disclosure, developed in close consultation with the relevant reporting entities. Each entity was given the opportunity to actively contribute to and review the content, ensuring that the final statement accurately reflects their respective operations and perspectives. The report constitutes ADM's consolidated disclosure pursuant to the requirements of the applicable Acts, covering activities and performance for the calendar year ending in December 31, 2025.

In accordance with the requirements of the Acts, I attest that I have reviewed the information contained in the report for ADM. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of these Acts, for the reporting year listed above.

DocuSigned by:

*Regina Bynote Jones*

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Regina Bynote Jones

Senior Vice President, Chief Legal Officer

Archer-Daniels-Midland Company

Date: 21 May 2026





## X. Appendix

### A. United Kingdom Modern Slavery Act 2015

ADM employs 1,573 workers<sup>1</sup> in the United Kingdom and operates several entities, reflecting the company's integrated value chain across agricultural origination, processing, and food ingredient manufacturing.

- Archer Daniels Midland (UK) Limited is principally an investment company, providing marketing services to other ADM companies and a joint venture.
- ADM Agriculture Limited engages in the wholesale of grain, oilseeds, and animal feeds.
- Archer Daniels Midland Erith Limited and Pura Foods Limited operate softseed crushing facility dedicated to the production of vegetable oils, fats, and animal feed products.
- ADM Protexin Limited manufactures a range of advanced food and health products, including probiotic and nutritional solutions, Totally Natural Solutions Limited provides natural flavoring ingredients derived from hops and botanicals for beverages, ADM Wild UK Limited develops and supplies natural flavorings, extracts, and specialty ingredients that enhance taste and functionality in food and drinks and, Fuerst Day Lawson Limited produces and distributes specialty ingredients, flavors, sweeteners, and nutritional components for the food, beverage, and industrial sectors.
- ADM Milling Limited engages in grain milling operations, producing flour and related products for the bakery, food manufacturing, and retail sectors.

This statement constitutes the modern slavery and human trafficking statement for the financial year ending April 5, 2026 for the aforementioned companies that fall within the scope of section 54(2) of the UK Modern Slavery Act 2015. It was approved by the boards of directors of its relevant reporting entities listed above in May 2026.

DocuSigned by:

*Regina Bynote Jones*  
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Regina Bynote Jones

Senior Vice President, Chief Legal Officer

Archer-Daniels-Midland Company

Date: 21 May 2026

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<sup>1</sup> As of December 31, 2025. It includes full-time and part-time workers.



B. Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023

ADM has two operating entities in Canada and employees 977 workers<sup>2</sup> in the country.

- ADM Agri-Industries Company is an ADM corporation which produces and sells vegetable oil, soybean and canola meal, wheat flour, animal feed and biodiesel in Canada. ADM Agri-Industries imports corn byproducts and fertilizer into Canada. The entity also buys and sells corn, soybeans, wheat, pulses, lentils, and fertilizer in Canada.
- Pancosma Canada Inc. is an ADM joint stock company which manufactures, sells and distributes animal nutrition products such as nutritional premixes for livestock, poultry and pets.

This statement constitutes the report for the financial year ending December 31, 2025 for ADM Agri-Industries Company and Pancosma Canada Inc. This report was approved pursuant to subparagraph 11(4)(b)(i) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act by the board of directors for ADM Agri-Industries Company and Pancosma Canada Inc in May 2026.

Signed by:  
  
504B1564D84F41F...

Kevin Wright  
General Manager  
ADM Agri-Industries Company  
Date: 12 May 2026

Signed by:  
  
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Karim Castro Carrillo  
Executive President  
Pancosma Canada Inc.  
Date: 18 May 2026

<sup>2</sup> As of December 31, 2025. It includes full-time and part-time workers.





### C. Australian Commonwealth Modern Slavery Act 2018

ADM employs 92<sup>3</sup> workers in Australia and operates ADM Trading Australia Pty Ltd (“ADM Trading”) and ADM Australia Pty. Limited (“ADM Australia”), both of which are wholly owned subsidiaries of ADM Australia Holdings I Pty Limited (“ADM Holdings”). ADM Trading and ADM Australia do not own or control any entities.

- ADM Trading Australia Pty Ltd is primarily engaged in the origination, merchandising, and trading of agricultural commodities, including grains, oilseeds, and pulses. The company connects Australian growers with domestic and international markets, providing risk management, logistics, and supply chain solutions, having country aggregator facilities in Western Australia, Victoria and Queensland and two grain receivals sites in South Australia and Victoria.
- ADM Australia Pty. Limited focuses on the importation and distribution of food ingredients, animal nutrition products, and other value-added ingredients in Australia, with central office and laboratory in Sydney, New South Wales and an office in Melbourne, Victoria.
- ADM Australia Holdings I Pty Limited is the parent company of ADM Trading and ADM Australia. ADM Holdings is a non-operating holding company and does not have its own operations or supply chains. It does not generate revenue or employ any employees.

ADM Australia is not a reporting entity under the Modern Slavery Act 2018 (Cth) for the relevant reporting period, but we provide information in this statement about this entity for the sake of completeness.

As a general comment, ADM globally is a highly integrated business. Accordingly, the same or similar human rights and modern slavery systems, practices, policies and procedures apply to all ADM entities in our group at a global and local level, including at the level of ADM Holdings, and ADM Trading. However, we have provided more specific information about how ADM Holdings and ADM Trading have satisfied each of the mandatory reporting criteria contained in the Modern Slavery Act 2018 (Cth) below.

For a description of ADM Holding’s and ADM Trading’s structure and operations – see above.

For a description of ADM’s supply chains which are relevant to ADM Trading please refer to the information under the heading “II. ADM Global Operations and Supply Chains” in the main body of this statement, and especially the information concerning the “Ag Services and Oilseeds segment” which is directly relevant to ADM Trading.

For a description of the risks of modern slavery practices in the operations and supply chains of ADM Trading please refer to section “VI. Assessing Risks and Impacts in ADM’s Supply Chain” in the main body of this

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<sup>3</sup> As of December 31, 2025. It includes full-time and part-time workers.



statement, which describes the risks of modern slavery practices in ADM's supply chains and business activities which apply to ADM Trading.

For a description of the actions taken by ADM Holdings and ADM Trading to assess and address those risks, including due diligence and remediation processes, please refer to:

- Section "IV. Policy Commitment" in the main body of this statement which sets out details of various ADM policies, including ADM's Supplier Expectations and employee training programs which apply to ADM Holdings and ADM Trading;
- Section "V. Sustainability Due Diligence" in the main body of this statement which sets out details of ADM's governance approach and modern slavery due diligence framework which are relevant to ADM Holdings and ADM Trading;
- Section "VII. Implementing Effective Actions" in the main body of this statement which sets out details of actions taken by ADM to assess and address risks present in ADM at a global level, including in ADM Holdings and ADM Trading;
- Section "VIII. ADM's remediation of Human Rights Issues" in the main body of this statement which sets out details of ADM's remediation processes globally, which apply to ADM Holdings and ADM Trading.

For a description of how ADM Trading assesses the effectiveness of the actions it has taken in relation to the above please refer to:

- Section "IV. Policy Commitment" in the main body of this statement which sets out information relating to the number of ADM employees who completed sustainability training in 2025, which is one way in which ADM assesses the effectiveness of its due diligence and modern slavery frameworks; and
- Section "V. Sustainability Due Diligence" in the main body of this statement which sets out details of ADM's global due diligence framework and includes information relating to ADM's monitoring and evaluation of corrective and collaborative actions taken as well as the effectiveness of its various sustainability programs, all of which is relevant to ADM Holdings and ADM Trading.

For a description of how ADM Holdings and ADM Trading have consulted with the entity providing this statement, Archer-Daniels-Midland Company, please refer to section "IX. Attestation".

