



July 3, 2023

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

At ADM, we unlock the power of nature to enrich the quality of life. We're a premier global human and animal nutrition company, delivering solutions today with an eye to the future. We're blazing new trails in health and well-being as our scientists develop groundbreaking products to support healthier living. We're a cutting-edge innovator, leading the way to a new future of plant-based consumer and industrial solutions to replace petroleum-based products. We're an unmatched agricultural supply chain manager and processor, providing food security by connecting local needs with global capabilities. And we're a leader in sustainability, scaling across entire value chains to help decarbonize our industry and safeguard our planet. From the seed of the idea to the outcome of the solution, we give customers an edge in solving the nutritional and sustainability challenges of today and tomorrow.

Learn more at www.adm.com.

A critical component of ADM's efforts to enrich lives around the world is our commitment to creating positive impacts for the people throughout our value chain and the communities in which we live and work. As part of that commitment, ADM 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.

ADM, its subsidiaries and its joint ventures strongly support 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

Governance

Our sustainability efforts are led by our Chief Sustainability Officer (CSO), who is supported by regional sustainability teams in North America, South America, and EMEA. Sustainability-related risks are reviewed quarterly through ADM's Enterprise Risk Management process. The



CSO provides sustainability updates to the Board of Directors at each quarterly meeting. The Sustainability & Corporate Responsibility Committee of the Board of Directors has direct oversight responsibility of the objectives, goals, strategies, risks and activities of the Company related to sustainability, including its human rights program and reviews progress and updates on a quarterly basis.

Human Rights Policy

In 2021, we updated our Human Rights Policy to improve clarity and align with the United Nations Guiding Principles (UNGP) framework. The ADM Human Rights Policy is approved by our Chief Executive Officer. The implementation of this Policy is the responsibility of the Sustainability team led by its Chief Sustainability Officer. The Policy promotes the practice of Human Rights Due Diligence and emphasizes the prevention of:

- *Forced, Bonded, or Compulsory Labor* - 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.
- *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.
- *Harassment and Discrimination* - we prohibit discrimination in our operations and supply chain on the basis of race, color, religion, sex, gender identity, national origin, immigration status, disability, age, sexual orientation, marital status or any other status protected by local law. We prohibit harassment and abuse. These prohibitions extend to migrant workers.

The Human Rights Policy also aims to protect the following:

- *Freedom of Association and Collective Bargaining* - We respect employees’ right to join, form or not to join a labor union without fear of reprisal, intimidation, or harassment.
- *Diversity and Inclusion* - We strive to ensure that our workplace is one of inclusion and acceptance. The diversity of our individual backgrounds, experiences and ways of thinking is an important driver in ADM’s success.
- *Safe and Healthy Working Conditions* - We will provide a safe and healthy working environment and comply with applicable health and safety laws and regulations. We will maintain systems and procedures designed to keep workers safe and protect them from occupational hazards, harassment and abuse
- *Proper Working Hours, Wages and Benefits* - All employees in our operations and supply chain will be compensated 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 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.
- *Access to Water* - We respect the right to access safe and clean drinking water and sanitation in our operations and supply chain.

Please refer to our [ADM Human Rights Policy Implementation Progress Report 2022](#) for an overview of our goals, plans, KPIs, and activities and actions to respect human rights in 2022.

Training

ADM Colleagues receive regular trainings, reinforcing the duty to know and abide by our Company's core values, policies, procedures and guidelines. In addition, all new hires receive Code of Conduct training at the beginning of their employment. In 2021, 99% of colleagues completed Human Rights Training.

Updated Supplier Expectation Document

In 2022, we updated our to include more robust sustainability language, including:

- **Wages** - All employees in the supplier's operations and supply chain will be compensated in accordance with all applicable local laws and regulations including those related to minimum wage and overtime pay.
- **Slavery and Child Labor – Slavery** - The supplier must prohibit the use of all forms of forced labor, including bonded labor, indentured labor, and child labor in their operations and 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, threats of violence or other forms of abuse will not be tolerated. **Child Labor** – The supplier explicitly 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 their operations and supply chain must meet the minimum age to work as defined by ILO Convention 138 as well as applicable local laws and regulations.
- **Health and Safety** - The supplier will provide a safe and healthy working environment and comply with applicable health and safety laws and regulations. Access to clean and appropriate sanitation facilities are required. Physical abuse, sexual abuse and harassment, and any other forms of abuse or harassment will not be tolerated.
- **WASH (Water, Sanitation, and Hygiene)** - The supplier respects the right to access safe and clean drinking water for their supply chain and the communities in which they operate. Access to sanitation and proper hygiene will also be respected.



- Working Hours - Working hours must be in line with legal requirements and any collective bargaining agreements applicable to the location. All overtime shall be voluntary. Working hours will not be excessive and workers will receive appropriate time off. It is strongly recommended working hours and rest days align with the ETI Base Code.
- Freedom of Association - The supplier respects employees' right to join, form or not a labor union without fear of reprisal, intimidation, or harassment. Where employees are represented by a legally recognized union, the supplier supports establishing a constructive dialogue with their freely chosen representatives. The supplier is committed to bargaining in good faith with such representatives of their employees.
- Discrimination - There will be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- Grievances - The supplier should have a grievance procedure in place to allow workers to bring concerns or workrelated issues to the attention of management in an anonymous manner.
- Environmental Impact - The supplier will take steps to minimize its environmental impact and ensure its compliance with applicable laws and regulations in the countries in which it operates. Suppliers should ensure they are monitoring their use of natural resources, as well as their waste management.
- Land Rights - The supplier respects land-tenure rights and the rights of indigenous and local communities to give or withhold their free, prior and informed consent (FPIC) to operations on lands to which they hold legal or customary rights. The supplier will respect Indigenous and Local Community rights to land and resources in accordance with the U.N. Declaration on the Rights of Indigenous Peoples.
- Taking Action - ADM recommends the supplier promote solutions to reduce climate change and GHG emissions, as well as promoting conservation of water resources and biodiversity in agricultural landscapes through sustainable land use management and ecological restoration practices in high conservation value areas.
- Sustainability - All suppliers are expected to adhere to ADM's sustainability policies, including the Human Rights Policy and the Policy to Protect Forests, Biodiversity and Communities, as well as the provisions in the following sections (Labor Conditions and Human Rights; Environment and Land Rights).
- Data Protection – We expect suppliers to safeguard ADM's confidential information, including personal and proprietary data, in order to remain our trusted partner. Suppliers must comply with all applicable data protection laws, including executing data processing agreements which require breach notification, employee training, appropriate technical and organizational measures preventing improper access, disclosure or destruction, among other requirements. Suppliers shall not share or sell ADM's information unless agreed in writing and shall not share unauthorized third-party information with ADM.
- Sourcing and Materials - The supplier will comply with any requests for material country of origin of goods and services or supply chain traceability strategies.



- Auditing - ADM retains the right to request an ADM and/or a third-party audit to verify compliance with these expectations. Audits will be based on risk analysis, previous findings, sentinel incidents, and stakeholder engagement.
- Non-Compliance (Consequences of misconduct and failing to meet ADM’s Supplier Expectations) - ADM expects its suppliers to fully comply with applicable laws and to adhere to internationally recognized environmental and social standards, in addition to its Code of Conduct and policies. Suppliers are expected to review the Managing Supplier Non-Compliance Procedure to best understand how ADM will handles issues of non-compliance.

For more information view [ADM Supplier Expectations](#), [ADM Code of Conduct](#) and [Human Rights Policy](#).

Compliance Assurance

Supply Chain Due Diligence

- In 2022, a cross functional group began including Human Rights in supplier agreements, onboarding, and policy language. The [Supplier Expectations Document](#) now includes specific sustainability and Human Rights provisions. Our policies have been translated into key languages to ensure broad understanding across global supply chains. Our Human Rights Policy has been embedded into contracts on a regional and business unit basis for part of ADM’s global supply chain.
- Additionally, Human Rights related questions have been implemented in certain supplier pre-screening questionnaires to proactively screen suppliers prior to entering business relationships in high risk geographies and supply chains.
- Further work is being done to verify our supply chains uphold human rights and are free from violations. ADM has been leveraging the use of 3rd party verifiers, Sedex and EcoVadis, to assist with this initiative. Work continues to onboard strategic suppliers onto sustainability verifiers.
- Please see key components on our program and their progress below:

Program Component	Status	Progress
Supply Chain Due Diligence Standard Operating Procedure	Drafted	The standard operating procedure is currently going under legal and compliance review to assure it will meet the requirements of upcoming due diligence laws.
Sustainability Contract Clauses	In Progress	Human Rights and Environmental contract clauses are embedded in contract templates for Human Nutrition and EMEA Transport. Efforts are ongoing to complete this on a global level.
Supplier Expectations Document	Completed	The Supplier Expectation Document now includes detailed Human Rights Provisions.



Supply Chain Mapping	In Progress	Over 90% of ADM's Global Human Nutrition supply chain has been mapped to the country of origin.
Risk Analysis	In Progress	An ongoing risk analysis is underway for human rights issues, with the first wave focusing on suppliers to our facilities that are subject to the German Supply Chain Act.
Risk Mitigation	In Progress	Supplier engagement with strategic suppliers has begun in accordance with the Standard Operating Procedure.

Supplier Risk Assessment

- In 2018 and 2019, ADM engaged a third-party 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 three phases:
 - Phase 1 – 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.
 - Phase 2 – Micro (site/farm) level risks – using the results from phase one, eight commodities (corn, soy, wheat, palm, apples, macadamias, peanuts and pecans) in 20 countries from 1,132 suppliers were assessed.
 - Phase 3 – Macro and micro analysis of the Company’s newly acquire vanilla business.
- From these preliminary results, we were able to begin crafting a due diligence program that ensures effective risk mitigation strategies. There are several ongoing projects that aim to bolster our mitigation processes throughout our supply chain:
 - *Standard Operating Procedure:*
 - We have been working this past year to develop a Human Rights Standardized Operating Procedure (HR SOP) for supplier engagement. The HR SOP will dictate how we assess risk and assign risk categories for all suppliers, as well as mitigation strategies and action plan development. As we continue to develop this framework, mitigating human rights risks will be at the forefront; working with our suppliers to assess and address risks increases transparency and enables collaboration to protect human rights throughout our supply chain.
 - *EiQ Analysis*
 - Utilizing Elevate’s EiQ tool, ADM began a risk-ranking process for commodities and countries. This comprehensive platform allows us to



standardize risk ranking and scoring mechanisms, evaluate specific risks within different supply chains, monitor news and press, and ensure proper focus on salient human rights risks.

○ *SEDEX Membership and Social Compliance Audits*

- We have been working closely with Sedex to connect to our direct suppliers via the SEDEX platform. 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. Risk mitigation includes many components, and social compliance audits and self-assessment questionnaires (SAQ) using a standardized methodology allows for active monitoring of our supplier’s efforts. Linking to suppliers through SEDEX provides visibility into our supply chain and insight into potential risks as well as our suppliers’ corrective action plans. While we are actively looking to use SEDEX as our standard method for assessment, we are also looking into comparable social compliance audits to allow flexibility for our suppliers to demonstrate compliance.
- Select ADM facilities register with SEDEX, maintain a self- assessment questionnaire and periodically host and complete 3rd-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 2022, there were no fees charged to jobseekers 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.
- In 2023, ADM will focus on connecting all applicable direct suppliers to the SEDEX platform and other sustainability tools to increase visibility across our supply chain.

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.
- 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 on our website, www.adm.com.
- In 2022, there were allegations of human rights violations in our supply chains. Each was investigated and addressed in accordance with our protocol, and the outcomes were published in our log. The allegations came from two entities:
 - US Customs and Border Control – allegations of human rights violations in the supply chain indirectly via third party suppliers and directly with a parent company.
 - Global Witness Letters – multiple reports of human rights violations, including indigenous rights and land tenure disputes.

High Risk 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.
- As a member of the Soft Commodities Forum (SCF), ADM committed and achieved in 2021 full traceability to farm for direct suppliers in the priority municipalities that account for almost 70% of all conversion within the Cerrado biome.
- 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 undergo periodic audits that assess their adherence to a broad set of 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.



- Member of the World Business Council for Sustainable Development (WBCSD) who share the same goals regarding No Deforestation and No Exploitation in their supply chains.
- 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.
- Since 2018, specialized firms with GIS technology (satellite imaging) have been cross-referencing planted areas within the farm polygons of our direct suppliers in high-risk areas to determine if the soy being sourced is compliant with our Policy. Farms are also verified to make sure there are no environmental issues (embargoed areas), encroachment into protected areas or Indigenous Territories, or labor issues which violate our No Exploitation Policy.
- In Brazil, we have mapped 100% of our direct suppliers to farm (polygons). This database enabled us to measure our DCF (Deforestation + Conversion Free) footprint, which in 2020 was 97% DCF. As our baseline we used 2015, the year we launched our No Deforestation Policy. In Argentina we source indirectly from areas close to the export facilities.
- Our Commitment to Protect Forests, Biodiversity and Communities includes no exploitation of people and local communities in accordance with our Human Rights Policy, emphasizing the respect of Indigenous Rights and Labor Rights.
- From 2019 through 2022, we have investigated around 250 allegations of deforestation and exploitation in our supply chain. All grievances were investigated in accordance with our protocol and reported on our public grievance log. Zero cases investigated were linked to our soy supply chain or showed a non-compliance with our No Deforestation Policy.
- In 2022, ADM continued to map our South American soybean supply chain and implement 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, we are sending training documents to our suppliers which outline our Human Rights Policy and the No Exploitation portion of our Commitment to No-Deforestation.
- Please refer to our Sustainability Progress Tracker and [2022 Soy Progress Reports](#) 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 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.
- ADM has engaged with 100% of its direct PKE suppliers in Indonesia and Malaysia. The engagement process includes discussions on sustainability topics including:
 - ADM's responsible palm policies and commitments.
 - Increasing traceability scores.
 - Assessing tier one suppliers using the palm scorecard.
- ADM encourages and expects its suppliers to report through the IRF profile. In 2022, 100% of suppliers had a public NDPE policy, and 99% had a fully aligned Human Rights Policy.
- Also in 2022, 100% of our palm suppliers had an internal grievance management procedure, and 100% had a public grievance log.
- Further, 100% of sourced palm volumes are covered under a public report of progress and 100% of volumes are covered under IRF reporting or committed to in 2022. ADM committed to have 100% of its volumes in the IRF category "Delivering" by 2025.
- Policy to Protect Forests, Biodiversity and Communities: ADM commits to build traceable and transparent agricultural supply chains that protect forests, biodiversity and communities worldwide. This Policy covers the overarching commitments applicable to all supply chains, as well as the more specific commitments to address the complexity of palm oil and soy supply chains.
- ADM continues to participate as an active member in the NDPE IRF Active Working Group to drive progress on reporting against NDPE criteria. ADM also recognizes ISPO/MSPO as a regulatory framework and as an entry points to the NDPE IRF framework.
- Transformation project examples:
 - Palm Lab Colombia
 - In this project, ADM supports the multi-stakeholder alliance of The Netherlands Oils and Fats Industry (MVO), Aceites S.A./Palmaceite S.A., Colombian National Federation of Palm Growers (Fedepalma), and Solaridad, an international nonprofit. The goal of the initiative is building a more inclusive palm oil value chain among Colombia's small producers, processors and the international market.
 - The mills Aceites S.A. and El Roble S.A.S. have undergone an analysis of their policies to identify gaps and receive input on how to close them. The smallholders supplying to these mills were benchmarked and recommendations for improvements were made.
 - In Q1 of 2022, main outcomes of the projects have been trainings for producers and workers, the definition of an internal control system and sustainability policy, and a submission of an independent smallholder



- group membership to RSPO. Furthermore, first aid kits and signs with social and environmental policies were delivered to producers as well as recycling points implemented. Next steps in the project will be the design of the health and safety system, the development of strategies to promote labour formalization, the diagnosis and analysis of gender equity, and the implementing of further trainings on different topics.
- Sabah Landscape (EF) – Malaysia
 - The Sabah Landscape project aims to sustainably transform palm supply chains by engaging in topics of sustainability practices, wildlife conflict, deforestation outside concessions, riparian zone management and labours issues. During Q1 of 2022, Covid-19 restrictions were lifted, and we resumed direct engagement activities with the smallholder community, upstream suppliers and other strategic stakeholders.
 - Progress this quarter happened in the supply chain transformation: 48 mills are making progress to achieve 100% traceability to plantations and 1 new mill is engaged to explore collaboration on smallholder activities. Forest protection and restoration increased to 9,547 ha of elephant range which is covered by conflict mitigation activities that are managed by a multi-stakeholder collaboration facilitated by EF. Field visits to smallholders were done to understand the ground situation and explore the riparian zone to design a buffer zone to reduce elephant movements from forest into plantations. In Q1 2022, the project reached 204 new farmers, and 33 new smallholders started transformation activities focused on resilience. Significant progress was also achieved in securing collaboration with key government agencies. Next steps will be the development of a digital platform for easier data analysis and group events will restart.
 - Mariposa - WISSE – Latin America
 - The Mariposa fund was launched at the end of 2019 to work with palm oil growers and processors in Latin America to transform the supply chain to be more sustainable. Mariposa is an innovative crowdfunding project. The first project launched runs for a duration of three years and aims to train local palm oil farmers on sustainable farming practices to protect the environment and become certified under a sustainability scheme.
 - The project has progressed very well despite not only Covid-19 related difficulties and damages from hurricanes, but also new difficulties arising from the war between Russia and Ukraine. The project goals have been slightly adjusted to have 540 smallholders certified under the ISCC and/or RSPO standards. The four mills enrolled in the program,



together with their independent smallholders, continue to be committed and managed to fulfill all activities planned for the year. So far, a total of 306 smallholders have been certified.

- During Q1 of 2022, the first training was held in February on the topic of generational gap and difficulties of involving young generations in the family farm business. In April, the second training was conducted on the topic of traceability of palm to the plantation. Additionally, videos explaining the certification audit process were developed to support the auditing process. 1520 smallholders were trained using the videos. In May, a digital notebook trial was implemented for record keeping and control of different sustainability practices.
- Please refer to our Sustainability Progress Tracker and [2022 Palm Oil Progress Reports](#) for more information on our progress on Sustainable Soy initiatives.

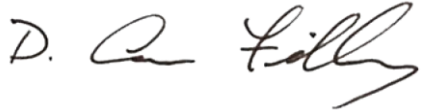
Vanilla

- In 2018, ADM acquired Rodelle Inc., a premium originator, processor and supplier of vanilla products with supply chains in Madagascar and Uganda. In 2019, ADM conducted supply risk analysis of those supply chains and has been working since to develop a unique farm-level assessment process to ensure voices are given to our growers.
- ADM sources vanilla through a vertically-integrated joint venture with Sahanala – SAVAN. The direct supply from grower to purchaser allows for a fair purchase price with more of the money going directly to the farmer.
- In addition, the SAVAN joint venture offers many community programs to help support the growers in the supply chain, including health offices, education support, and access to training and market information.
- In 2021, ADM continued the implementation of a grower-level compliance verification program, and we worked with a third party to develop a vanilla sourcing standard.
- Based on the standard created in 2021, a self-assessment questionnaire (SAQ) was developed and implemented. This self assessment questionnaire was distributed in 2021 and 2022.
- ADM expanded its program in 2022 to encompass more regions of Madagascar, ensuring further representation and allowing more growers to take part in the joint venture.
- Both Rodelle and Sahanala have completed third-party SMETA audits and will have routine re-audits in 2023.
- The results of the 2022 audits and SAQ responses are currently under review and will shape the future of our program.



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, 2022.

This statement is subject to approval by the Sustainability and Corporate Responsibility Committee of the Board of Directors of ADM.

A handwritten signature in black ink, appearing to read "D. Cameron Findlay". The signature is fluid and cursive, with a large initial "D" and a long, sweeping underline.

D. Cameron Findlay
Senior Vice President, General Counsel and Secretary

