ADM – FY 2023 AU Modern Slavery Disclosure

1. Introduction

This statement ("Statement") is prepared under the Australian Modern Slavery Act 2018 (Cth) for the reporting period 1 January 2023 to 31 December 2023 on behalf of ADM Trading Australia Pty Ltd ("ADM Trading") (ACN: 126 806 979) whose registered office is Naylor House, Level 4 North, 191 Pulteney Street Adelaide SA 5000 Australia. ADM Trading is a wholly owned subsidiary of Alfred C. Toepfer International Netherlands B.V. The ultimate parent undertaking and controlling party is Archer Daniels Midland Company, which is incorporated in Illinois, Unites States of America. ADM Trading does not own or control any other entities.

2. ADM Structure and Operations

Archer-Daniels-Midland Company (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; a premier human and animal nutrition provider; a trailblazer in groundbreaking solutions to support healthier living; an industry-leading innovator in replacing petroleum-based products; and a leader in sustainability. ADM's breadth, depth, insights, facilities and logistical expertise give the Company unparalleled capabilities to meet demand driven by global trends related to food security, health and well-being, and sustainability of the agriculture and food value chains. From the seed of the idea to the outcome of the solution, ADM gives customers an advantage in solving the nutritional and sustainability challenges of today and tomorrow. The Company is one of the world's leading producers of ingredients for sustainable nutrition. From staple foods, such as flour, oils, and sweeteners, to innovative alternatives like plant-based meat and dairy, ADM offers the industry's broadest portfolio of food and beverage solutions. The Company is also a leader in animal nutrition. Today, more and more people want to feed their pets with the same kind of clean, simple, and healthy products that they eat themselves, and consumers expect livestock and poultry to be fed and raised naturally, humanely, and sustainably. ADM offers a range of ingredients, flavors, and solutions from nature to meet animal's needs.

The Company's operations are organized, managed, and classified into three reportable business 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, and the crushing and further processing of oilseeds such as soybeans and soft seeds (cottonseed, sunflower seed, canola, rapeseed, and flaxseed) into vegetable oils and protein meals. Oilseeds products produced and marketed by the segment include ingredients for food, feed, energy, and industrial customers. Crude vegetable oils produced by the segment's crushing activities are sold "as is" to manufacturers of renewable green diesel and other customers or are further processed by refining, blending, bleaching, and deodorizing into salad oils. Salad oils are sold "as is" or are further processed by hydrogenating and/or interesterifying into margarine, shortening, and other food products. Partially refined oils are used to produce biodiesel and glycols or are sold to other manufacturers for use in chemicals, paints, and other industrial products. Oilseed protein meals are principally sold to third parties to be used as

ingredients in commercial livestock and poultry feeds. The Ag Services and Oilseeds segment is also a major supplier of peanuts and peanut-derived ingredients to both the U.S. and export markets. In North America, cotton cellulose pulp is manufactured and sold to the chemical, paper, and other industrial markets. The Ag Services and Oilseeds segment's grain sourcing, handling, and transportation network (including barge, ocean-going vessel, truck, rail, and container freight services) provides reliable and efficient services to the Company's customers and agricultural processing operations. The Ag Services and Oilseeds segment also includes agricultural commodity and feed product import, export, and global distribution, and structured trade finance activities. The Company engages in various structured trade finance activities to leverage its global trade flows.

The activities of ADM Trading fall principally within the Ag Services and Oilseeds segment. ADM Trading Australia Pty Ltd is primarily engaged in the trading of grains, cotton, oilseeds and legumes. ADM Trading connects Australian growers with domestic and international markets, providing risk management, logistics, and supply chain solutions. ADM Trading's supply chain consists of the origination and acquisition of grain, cotton, oilseed and legume commodities and the subsequent trading, merchandising and sale of those commodities, including substantial related-party sales.

3. ADM's Policies Related to Human Rights in our Supply Chain and Operations

A. Governance

Our sustainability efforts are overseen by our Board of Directors, including a dedicated Sustainability and Corporate Responsibility Committee, and led by our Chief Sustainability Officer (CSO), who is supported by regional sustainability teams.

B. 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 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 held, in the form of money, identification or other personal belongings, without workers' consent as a condition of employment.

- Child Labor - defined as (1) work that is hazardous to children's health, safety or morals, (2) work that interferes with compulsory education, or (3) work 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.

Please refer to our Implementation Progress Report 2023 for an overview of our goals, plans, KPIs, and activities and actions to respect human rights in 2023.

C. ADM's Expectations for Its Suppliers

We set forth Supplier Expectations that include specific sustainability and Human Rights provisions addressing wages, prohibitions on slavery and child labor, health and safety, working hours, freedom of association, discrimination, grievances, environmental impact, land rights, and sourcing and materials. We expect each of our suppliers to comply with these expectations. Please see our Supplier Expectations document here. Our policies have been translated into key languages to ensure broad understanding across global supply chains. Our Human Rights Policy is embedded into contracts on a regional and business unit basis as part of ADM's global supply chain program. For additional information view ADM's Code of Conduct and ADM's Human Rights Policy.

We include Human Rights related questions in certain supplier pre-screening questionnaires to proactively screen suppliers prior to entering business relationships in high-risk geographies and supply chains. ADM has leveraged third-party verifiers, such as Sedex and EcoVadis, to review that our supply chains uphold human rights and are free from violations. The chart below sets forth our progress on relevant supply chain due diligence initiatives.

Program Component	Status	Progress
Supply Chain Due Diligence Standard Operating Procedure and Training	Completed	Our Standard Operating Procedure specifies detailed requirements for conducting sustainability-based risk assessments with corresponding risk mitigation measures. All procurement staff have been trained on the procedure.
Sustainability Contract Clauses	In Progress	Efforts continue to embed human rights contract clauses in all types of supplier relationships.
Supplier Expectations Document	Completed	The Supplier Expectations Document has been embedded into Terms and Conditions, certain contract clauses, and in agreements for our suppliers depending on relationship and region.
Supply Chain Mapping	In Progress	Nearly 100% of ADM's Global Human Nutrition supply chain has been mapped to country of origin. Animal Nutrition and non-commodity procurement for AS&O and Carb Sol are in progress. Traceability of our Palm and Soy supply chains can be found in our Sustainability Goals and Key Performance Indicators.
Risk Analysis	Annual, and during supplier onboarding	An ongoing risk analysis is underway for human rights issues. We leverage the EiQ platform to facilitate risk analyses.
Risk Mitigation	Ongoing	Supplier engagement with strategic suppliers is conducted in accordance with Standard Operating Procedures. Mitigation includes the inclusion of contract

		clauses, completion of Self-Assessment Questionnaires, and auditing for compliance.

D. 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. In 2023, all procurement staff were trained on Supply Chain Due Diligence. We plan to include further Human Rights training for all colleagues in the coming year.

4. Identifying and Assessing Risks

We 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. The assessment consisted 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. o

- Phase 3: Macro and micro analysis of specialty commodities.

  Using the results from phase 1 and 2, this phase included an analysis and interpretation of our risk analysis to inform decision making.

Additionally, we utilize the EiQ tool to conduct human rights risk assessments based on sourcing country and commodity. The tool provides an array of indices from a combination of international, academic, and civil society data. Our indices are weighted in a customized way for our most salient human rights concerns. We then use the results of the tool to prioritize areas for impact. From these preliminary results, we began crafting a due diligence program that ensures effective risk assessment and mitigation strategies.

5. Implementing Effective Actions

A. Supply Chain Due Diligence

In 2023, we finalized our Supply Chain Due Diligence Standard Operating Procedure (SOP). The SOP serves as a guide to implement the Supply Chain Due Diligence (SCDD) process, which aims to prevent, resolve and/or mitigate adverse impacts on people and the environment in our supply chain. It is our goal to deploy this SOP globally. ADM is implementing its SCDD program based on the United Nations Global Compact (UNGC) Framework, the UN Guiding Principles on Business and Human Rights, the Organisation for Economic Co-operation and Development (OECD), and the Food and Agriculture Organization (FAO) of the United Nations Guidance for Responsible Agricultural Supply Chains. Our program and policies apply to all employees, officers, directors, contract workers and agents of ADM, our divisions, and our affiliates in all countries. In addition, we expect that our direct and indirect suppliers, business partners, agents, and consultants uphold our policies.

Our SCDD program allows us to set and communicate clear expectations with our customers and monitor compliance, serving as an enforcement mechanism. Due to the nature of human rights and environmental issues, this is an iterative process that we seek to continuously improve. The foundation is based on the aforementioned policies. There are six integral parts of our sustainability program:

- Policy Commitment
- Risk and Impact Assessment
- Implementing Effective Actions
- Tracking and Monitoring
- Communication and Reporting
- Grievance and Remedy

B. SEDEX Membership and Social Compliance Audits

We work 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, such as social compliance audits and self-assessment questionnaires (SAQ)using a standardized methodology allows for active monitoring of our suppliers' efforts. Linking to suppliers through SEDEX provides better 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.

Certain ADM facilities register with SEDEX, maintain a self-assessment questionnaire, and periodically host and complete third-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, we report on specific KPIs, in accordance with our Human Rights program. At the ADM facilities visited in 2023, 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.

C. Other engagement

We actively engage with our smallholder farmers in capacity building efforts throughout our value chain. This programming can include access to training, equitable business opportunities, community livelihood enhancement, and other techniques to ensure our grower communities are supported. To date, we have not identified that any of our sustainability actions have resulted in loss of income to vulnerable families. For more information on our broader sustainability efforts, please visit our sustainability website.

6. ADM's Remediation of Human Rights Issues

A. ADM Way Helpline

We host 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.

B. 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 supply chain. The grievance mechanism is available to any party – internal or external – who wants to voice a concern by emailing 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 on our website.

C. Remediation

ADM engages with its stakeholders on an ongoing basis to monitor for forced or child labour 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.

Compliance Annex

ADM 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 Trading. However, we have provided more specific information about how ADM Trading has satisfied each of the mandatory reporting criteria contained in the Modern Slavery Act 2018 (Cth) below.

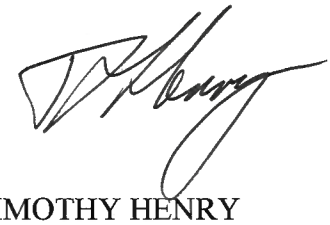
Section 16(1) mandatory content criteria	**Cross-reference**
(a) The statement must clearly identify the reporting entity it covers (s 16(1)(a)). For a joint statement, every reporting entity covered by the statement must be identified	Section 1, Introduction, page 1
(b) The statement must describe the structure, operations and supply chains of the reporting entity	Section 2, ADM Structure and Operations, pages 1-2
(c) The statement must describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Section 4, Identifying and Assessing Risks, page 4
(d) The statement must describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Section 3, ADM's Policies Related to Human Rights in our Supply Chain and Operations, sub-headings B. Human Rights Policy (page 2), C. ADM's Expectations for Its Suppliers (page 3) and D. Training (page 4) Section 5, Implementing Effective Actions, sub-headings A. Supply Chain Due Diligence (page 5) and C. Other engagement (pages 6-7) Section 6, ADM's Remediation of Human Rights Issues, page 6
(e) The statement must describe how the reporting entity assesses the effectiveness of such actions	Section 5, Implementing Effective Actions, sub-heading B. SEDEX Membership and Social Compliance Audits, pages 5-6
(f) describe the process of consultation with: (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a statement	Not applicable - ADM Trading does not own or control any other entities

under section 14—the entity giving the statement	

This statement is made under the Australian Modern Slavery Act 2018 ("Act") on behalf of ADM Trading Australia Pty Ltd for the year ending 31 December 2023.

This statement was approved by the Directors of ADM Trading Australia Pty Ltd in their capacity as principal governing body on 22 July 2026. The directors consider the statement is a true and fair account of the company's modern slavery risks and mitigation actions.

This statement is signed by Timothy Henry in his role as Director of ADM Trading Australia Pty Ltd, a responsible member of its board, being the principal governing body of ADM Trading Australia Pty Ltd.



TIMOTHY HENRY

DIRECTOR

ADM Trading Australia Pty Ltd

Date: 22 July 2026