



ADM – FY 2024 AU Modern Slavery Disclosure

1. Introduction

This statement (“Statement”) is a joint modern slavery statement made under the Australian Modern Slavery Act 2018 (Cth) for the reporting period 1 January 2024 to 31 December 2024. It covers two reporting entities: ADM Australia Holdings I Pty Ltd (“ADM Holdings”) (ACN 158 548 675) and its wholly owned subsidiary 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 Holdings is the parent company of two wholly owned Australian subsidiaries, ADM Trading and ADM Australia Pty Ltd (“ADM Australia”) (ACN 057 641 308). The immediate parent of ADM Holdings is Archer Daniels Midland Singapore, Pte. Ltd. The ultimate parent undertaking and controlling party is Archer Daniels Midland Company, which is incorporated in Illinois, United States of America. ADM Trading and ADM Australia do not themselves own or control any other entities.

2. ADM Structure and Operations

Archer-Daniels-Midland Company and its subsidiaries (the “Company” or “ADM”) unlock 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 a premier human and animal nutrition provider, offering one of the industry's broadest portfolios of ingredients and solutions from nature. The Company is a trailblazer in health and well-being, with an industry-leading range of products for consumers looking for new ways to live healthier lives. ADM is a cutting-edge innovator, guiding the way to a future of new consumer and industrial solutions. ADM is a leader in sustainability, scaling across entire value chains to help decarbonize the multiple industries it serves. Around the globe, the Company's innovation and expertise are meeting critical needs while nourishing quality of life and supporting a healthier planet. Learn more at www.adm.com

ADM is a truly global company of approximately 44,000 employees working together to achieve extraordinary results. The Company's operations are organized, managed, and classified into three reportable business segments: Ag Services and Oilseeds, Carbohydrate Solutions, and Nutrition.

- 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. 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. Additionally, the segment also includes agricultural commodity and feed product import, export, and global distribution, and structured trade finance activities. This segment also includes the Company's share of the results of its equity investments in Wilmar, Pacificor, Stratas Foods LLC, Edible Oils Limited, Olenex, SoyVen, and Gradable.
- The Carbohydrate Solutions segment is engaged in corn and wheat wet and dry milling and other activities. The Carbohydrate Solutions segment converts corn and wheat into products and ingredients used in the food and beverage industry including sweeteners, corn and wheat starches, syrup, glucose, wheat flour, and dextrose. By fermentation of dextrose, the

Carbohydrate Solutions segment produces alcohol and other food and animal feed ingredients. Carbohydrate Solutions also produces citric acids which are used in various food and industrial products. The Carbohydrate Solutions segment is a leader in carbon capture and sequestration. This segment also includes the Company's share of the results of its equity investments in Hungrana Ltd., Almidones Mexicanos S.A., Aston Foods and Food Ingredients, Red Star Yeast Company, LLC, and LSCP, LLLP.

- The Nutrition segment serves various end markets including food, beverages, and nutritional supplements for humans, and complete feed, feed premix and additives, petfood 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, natural flavors, flavor systems, natural colors, 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. This segment also includes the Company's share of the results of its equity investments in Vimison S.A. de C.V., ADM Matsutani LLC, Matsutani Singapore PteLtd., ADM Vland Biotech Shandong Co., Ltd., Dusial S.A., and Vitafort ZRT.

The activities of the Australian reporting entities described fall principally within the Ag Services and Oilseeds segment (in the case of ADM Trading's commodity trading) and, in the case of ADM Australia Pty Ltd, within the group's Nutrition segment. The principal activities of the reporting entities are:

- ADM Trading Australia Pty Ltd: 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 and having country aggregator facilities in Western Australia, Victoria and Queensland and two grain receival sites in South Australia and Victoria. 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.
- ADM Holdings: a non-operating holding company and does not have its own operations or supply chain. It does not generate revenue or employ any employees. ADM Holdings is the immediate parent company of ADM Australia and ADM Trading; as such, the principal activities within the consolidated group also include the importation and distribution of food oddities, bioproducts and protein specialties in Australia with a central office and laboratory in Sydney, New South Wales and an office in Melbourne, Victoria.

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

A. Governance

The Sustainability and Technology Committee of the Board actively oversees the Company's objectives, goals, strategies, and activities relating to sustainability. The Sustainability 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 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.

B. ADM's Policies

Our Code of Conduct is fundamental to everything we do at ADM. We take seriously our commitments to make a positive impact on our people, in our businesses, and in the global community. By sharing our Code and specific applicable policies with colleagues and business partners, we communicate what is expected and strengthen our culture of integrity.

As part of the onboarding process, ADM employees receive training on the Code of Conduct. All employees take part in annual training designed to ensure that their actions consistently align with the company's commitment to integrity and ethical business practices.

The ADM Human Rights Policy outlines our commitments to human rights. Approved by our Chief Executive Officer, the policy is guided by the United Nations Guiding Principles on Business and Human Rights (UNGPs), the International Bill of Human Rights, and the International Labour Organization (ILO) Fundamental Principles and Rights at Work. This 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, threats of 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.
- Harassment and Discrimination - ADM prohibits 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.

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.

Our policies have been translated into key languages to ensure broad understanding across global supply chains. Our Supplier Expectations are embedded into procurement contracts on a regional and business unit basis as part of ADM's global supply chain program.

C. 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.

4. Identifying and Assessing Risks

Facilitated by an independent third party, ADM has identified the human rights salient risks inherent to our operations and supply chain, which include forced labor and child labor. These risks have been integrated into ADM's human rights risk assessment framework.

The 2024 risk assessment analyzed the social risks associated with specific commodities along with the salient risks in the countries of origin for 99% of the total volume of commodities sourced by ADM during the 2023 calendar year. By mapping our supply chain and identifying the highest risk profiles, ADM can work to prevent or mitigate adverse human rights impacts on local communities and influence positive change.

The risk assessment was conducted through three phases:

- Phase 1: Commodity

This phase was designed to assess the risk of 25 in-scope commodities based on the social risk associated with the production (workforce profile, businesses practices and production characteristics).

- Phase 2: Geography

Building on the results from phase one, several social indices were assessed to identify the salient risks associated with the 76 countries of origin of the in-scope commodities.

- Phase 3: Leverage

Leveraging the insights derived from both phases 1 and 2, this phase focused on the prioritization of high-risk commodities and their respective countries of origin, based on purchased volumes, while categorizing those with similar characteristics into distinct clusters for more targeted analysis.

We used these results to assess the scale, scope, and irremediability of potential human rights impacts identified in our high risk supply chains, helping us to develop a long-term strategy to address and prevent systemic human rights issues.

5. Implementing Effective Actions

A. Supply Chain Due Diligence

ADM's Human Rights Due Diligence Framework provides a clear guide for identifying, preventing, resolving, and mitigating the negative impacts on people and the environment within our supply chains. It is based on the United Nations Global Compact (UNGC) Framework and the United Nations Guiding Principles on Business and Human Rights.

ADM developed an integrated framework – Standard Operating Procedure (SOP) - to serve as a guide to effectively identify, prevent, resolve, and/or mitigate adverse impacts on people and the environment in our supply chains. ADM's goal is to leverage the framework on a global scale, which will be achieved through a progressive rolling out in strategic regions and businesses.

ADM's Risk & Impact Assessment supports ADM's efforts to evaluate the risk exposure of our suppliers and elaborate specific measures to promote their alignment with ADM Supplier Expectation Policy. Our Risk & Impact Assessment is pursued throughout three sequential steps.

1. **Supply Chain Screening** Supply chains are generically evaluated to identify where risk to human rights and the environment may exist. The risk screening considers, but it is not limited to, social norms in country of origin, workforce situation and industry-specific practices.
2. **Suppliers Assessment** Supplier risk exposure is individually calculated based on multiple official indicators which evaluate the likelihood and severity of human rights infringements in supplier's operations.
3. **Risk-Mitigation Measures** Risk exposures are prioritized and correlated to ADM's influence for obtaining risk mitigation, leading to a strategy to execute an effective supplier engagement program towards risk-mitigation measures.

We strive for solid business relations and open communication with stakeholders. However, any supplier found as non-compliant with our policies will be engaged according to our procedure for Managing Supplier Non-Compliance.

B. ADM's Processing Facilities

Several ADM facilities are registered on Supplier Ethical Data Exchange (Sedex) and regularly undergo third-party Sedex audits. The human rights portion of these audits includes assessment of facility conditions, child labor, forced/bonded labor, eligibility for employment, ethical recruitment, safety, discrimination, harassment and abuse, compensation, freedom of association and collective bargaining, and indigenous populations and communities. At the ADM facilities audited, there have never been findings of human trafficking.

Furthermore, in 2024, ADM initiated an internal review to assess whether a rehabilitation program supported by one of our facilities aligned fully with the guidelines recommended by the International Labour Organization (ILO) for engaging voluntary prison labor. The program was intended to support individuals nearing the end of their sentences by offering opportunities to develop skills and gain work experience to help ease their transition post-incarceration.

While all participants received the same training, safety equipment, and pay as other employees, ADM was unable to confirm that every aspect of the program met the full scope of

ILO-recommended standards. In line with our commitment to upholding our human rights policy, we made the decision to start the phasing out our participation in the program.

C. Supplier's Facilities

ADM is connected to over a thousand of direct suppliers on Sedex. The platform allows ADM to continuously monitor the progress of our suppliers on responsible sourcing audits and self-assessment questionnaires (SAQ), which provides visibility into our supply chain's compliance with labor standards, health & safety, environment and business ethics best practices and insight into potential risks and improvement areas.

D. Other Engagement

We actively engage with our smallholder farmers in capacity building efforts throughout our value chain. These programs 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 any loss of income to vulnerable families as a result of our actions. 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.

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 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 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 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.

7. Consultation

This Statement was prepared in consultation with each reporting entity it covers. Because ADM Holdings, ADM Trading and ADM Australia operate under the same group wide human rights and modern slavery policies, systems and procedures, a single consolidated description of those



policies and actions has been prepared and then reviewed on behalf of each reporting entity. ADM Holdings is a non-operating holding company with no employees and no operations of its own; its participation in this statement was therefore effected through its directors and officers and the group legal, compliance and sustainability functions, who confirmed the content of the statement insofar as it concerns ADM Holdings. In the case of ADM Trading and ADM Australia, relevant personnel with responsibility for operations, procurement and supply chain also reviewed and contributed to the Statement.

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 Holdings, ADM Trading and ADM Australia. 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.

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. ADM's Policies (page 3) and C. Training (page 4) Section 5, Implementing Effective Actions, sub-headings A. Supply Chain Due Diligence (pages 4-5), B. ADM's Processing Facilities (pages 5-6), Supplier's Facilities (page 6) and Other Engagement (page 6) 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-headings A. Supply Chain Due Diligence (pages 4-5), B. ADM's Processing Facilities (pages 5-6), Supplier's Facilities (page 6) and Other Engagement (page 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	Section 7, Consultation and preparation of this Statement, page 7

covered by a statement under section 14—the entity giving the statement	
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This joint statement is made under the Australian Modern Slavery Act 2018 (“Act”) on behalf of both reporting entities, ADM Australia Holdings I Pty Ltd and ADM Trading Australia Pty Ltd for the year ending December 31 2024.

This joint statement was approved by the board of ADM Australia Holdings I Pty Ltd, as a reporting entity and as the parent entity of ADM Trading Australia Pty Ltd, on 22 July 2026.

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



TIMOTHY HENRY

DIRECTOR

ADM Australia Holdings I Pty Ltd

Date: 22 July 2026