



ADM – FY 2021 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 2021 to 31 December 2021 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 is the Archer Daniels Midland Company. 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 provide access to nutrition worldwide. The Company is a global leader in sustainable human and animal nutrition, one of the world’s premier agricultural origination and processing companies, and an innovator in creating sustainable solutions in agriculture, energy, and bio-based alternatives to materials and fuels currently produced from petroleum products. ADM’s breadth, depth, insights, facilities and logistical expertise give the Company unparalleled capabilities to meet needs for food, beverages, health and wellness, and more. From the seed of the idea to the outcome of the solution, ADM enriches the quality of life the world over. The Company is one of the world’s leading producers of ingredients for human and animal nutrition, and other products made from nature.

ADM transforms natural products into staple foods, sustainable and renewable industrial products, renewable fuels, and an expansive pantry of food and beverage ingredients and solutions for foods and beverages, supplements, nutrition for pets and livestock and more. ADM also has significant investments and joint ventures that aim to expand or enhance the market for its products or offer other benefits including, but not limited to, geographic or product-line expansion. With an array of unparalleled capabilities across every part of the global food chain, ADM gives its customers an edge in solving global challenges of today and tomorrow.

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 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, 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, oilseed and legume commodities and the subsequent trading, merchandising and sale of those commodities, including substantial related-party sales. ADM's Policies Related to Human Rights in our Supply Chain and Operations

A. 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 EMEAI. 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.

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 implementation of this policy is the responsibility of the Sustainability team led by its CSO. 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 2021](#) for an overview of our goals, plans, KPIs, and activities and actions to respect human rights in 2021.

C. [ADM's Expectations for Its Suppliers](#)

We expect all of our suppliers to:

- Know, understand, and follow laws and regulations that govern work done on our behalf.
- Never use child labor or forced or bonded labor.

- Refrain from using labor brokers who charge fees to jobseekers in exchange for employment.
- Have appropriate measures in place to ensure eligibility for employment.
- Compensate workers in accordance with all applicable local laws and regulations.
- Provide working conditions that comply with applicable laws and industry norms.

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

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 in the beginning of their employment. In 2021, 99% of colleagues completed Human Rights Training.

3. **Identifying and Assessing Risks**

A. Supplier Risk Assessment

In 2018 and 2019, ADM engaged Elevate, a third-party consultant in sustainable supply chain services, 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 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 risk analysis tool, EiQ, ADM in undertaking a risk-ranking process for commodities and countries. The EiQ tool combines news articles, government, sector, and commodity data to conduct highly detailed risk analyses. Its risk matrix can then be used to determine mitigation steps. 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, a third-party data exchange platform focused on responsible sourcing, to connect to our direct suppliers via their platform. SEDEX is a not-for-profit organization dedicated to driving improvements in responsible and ethical business practices – including labor standards – in global supply chains. Linking to suppliers through SEDEX provides visibility into our supply chain and insight into potential risks as well as our suppliers' corrective action plans. Reviewing suppliers' social compliance audits and self-assessment questionnaires (SAQ) allows for active monitoring of our supplier's efforts to prevent human rights violations and mitigate risks. 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 39 ADM facilities visited in 2021, 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.

4. ADM's Remediation of Human Rights Issues

A. 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.

B. 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.

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)).	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, sub-heading A. Supplier Risk Assessment, pages 4-5
(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 (pages 2-3), C. ADM's Expectations for Its Suppliers (pages 3-4) and D. Training (page 3) Section 5, ADM's Remediation of Human Rights Issues, sub-headings A. ADM Way Helpline, B. Public-Facing Grievance Mechanism and C. Remediation, page 6
(e) The statement must describe how the reporting entity assesses the effectiveness of such actions	Section 4, Identifying and Assessing Risks, under SEDEX Membership and Social Compliance Audits, page 5
(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 under section 14—the entity giving the statement	Not applicable - ADM Trading does not own or control any other entities

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 2021.

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.

A handwritten signature in black ink, appearing to read "T. Henry", is positioned above the printed name.

TIMOTHY HENRY

DIRECTOR

ADM Trading Australia Pty Ltd

Date: 22 July 2026