

ADM – FY 2022 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 2022 to 31 December 2022 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 enrich the quality of life. The Company is an indispensable 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 edge 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 every 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. 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 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.

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 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.

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

In 2022, we updated our supplier expectations document 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 work related 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 handle issues of non-compliance.

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 at the beginning of their employment

3. Identifying and Assessing Risks

A. 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.

4. **Implementing Effective Actions**

A. 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
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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 EMEAI 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.

5. 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.

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)).	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 6-7
(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 3-4), C. ADM's Expectations for Its Suppliers (pages 4-6) and D. Training (page 6) Implementing Effective Actions, sub-heading A. Supply Chain Due Diligence, pages 7-8 ADM's Remediation of Human Rights Issues, sub-headings A. ADM Way Helpline, B. Public-Facing Grievance Mechanism and C. Remediation, pages 8-9
(e) The statement must describe how the reporting entity assesses the effectiveness of such actions	Identifying and Assessing Risks, under SEDEX Membership and Social Compliance Audits, page 7
(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 2022.

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", written over a light blue horizontal line.

TIMOTHY HENRY

DIRECTOR

ADM Trading Australia Pty Ltd

Date: 22 July 2026