ADM – FY 2019 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 2019 to 31 December 2019 on behalf of ADM Trading Australia Pty Ltd ("ADM Trading") (ACN: 126 806 979) whose registered office is Level 3, 199 Grenfell St, 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. ADM is a global leader in human and animal nutrition and one of the world's premier agricultural origination and processing companies. The Company's breadth, depth, insights, facilities, and logistical expertise give it exceptional 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'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. Crude vegetable oils produced by the segment's crushing activities are sold "as is" 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, tree nuts, 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.

3. **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, who is supported by regional sustainability teams. Sustainability-related risks are reviewed quarterly through ADM's Enterprise Risk Management process. In 2019, our company's Board of Directors created a Sustainability and Corporate Responsibility Committee. This committee has oversight of sustainability and corporate responsibility matters, ensuring leadership and oversight at the highest level for these efforts. Sustainability updates and discussions are also regularly undertaken by the full Board.

B. Human Rights Policy

The ADM Human Rights Policy is approved by our Chief Executive Officer. The Policy:

- Is aimed at ensuring that our colleagues, suppliers and contractors respect workers' rights and comply with all applicable local, national and international laws governing working conditions.
- Contains strict prohibitions against the use of child labor, forced labor and bonded labor, and includes several other guidelines to protect workers from exploitation.
- Creates an implementation framework for identifying, assessing and addressing potential human rights risks in our supply chain.
- Requires appropriate action to be taken against suppliers if we learn that they do not satisfy our principles to respect human rights or misrepresent the conditions under which crops, goods or services have been produced.
- Specifies actions taken if a supplier does not demonstrate a good-faith effort to address issues in a timely manner; actions may include exclusion from new direct contracts or termination of our relationship.
- Includes a definition section which clearly outlines what child and forced labor mean, in accordance with International Labour Organization (ILO) standards. This enables ADM to clearly communicate our expectations and requirements.
- Has been translated into key languages and posted on our website, www.adm.com in recognition of our global supply chain.

Please refer to our ADM Human Rights Policy Implementation Progress Report 2019 for an overview of our goals, plans, KPIs, and activities and actions to respect human rights in 2019.

C. Supplier Mandate

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.

4. 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 acquired vanilla business.

B. SEDEX Membership and Social Compliance Audits:

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.

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 2018 and in 2019, there were no fees charged to job-seekers 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 2019, ADM expanded its SEDEX membership to enable review of upstream suppliers' self-assessment questionnaires, audits, and corrective action plan reports to further our supply chain risk assessment.

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 Commitment to No- Deforestation 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 3-4
(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 (pages 2-3), C. Supplier Mandate (page 3) and D. Training (page 3) Section 5, ADM's Remediation of Human Rights Issues, sub-headings A. ADM Way Helpline and B. Public-Facing Grievance Mechanism, pages 4-5
(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 4
(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 2010.

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