



EU Code of Conduct on Responsible Food Business and Marketing Practices

At ADM, we unlock the power of nature to enrich the quality of life for people across the world. We know that the health of our natural resources is critical to our future, and that our commitments to sustainable practices will result in a stronger ADM and a better planet.

We are proud to be the go-to sustainable sourcing partner for our customers, and more widely, we are committed to driving change through good practices, progressive solutions and mindful actions that make a positive impact.

Building a More Sustainable Value Chain

We are the foundation of food on tables the world over – flavoring culture, forwarding health and wellness, and venturing into new possibilities and discoveries for human and animal nutrition. Creating value through the entire supply chain gives us the opportunity to help build a more sustainable food system



Sustainability Commitments and Policies

ADM has set forth several key social and environmental commitments and policies that collectively outline our expectations for our colleagues, business partners and contractors, and our organization as a whole, with respect to our sourcing operations. They establish clear standards that govern our approach to raw material sourcing, environmental stewardship and employee conduct, among other areas, and they state our positions on issues of widespread public interest. These standards were developed with input from our operations, law,



compliance, environmental, and health and safety teams. You can find our commitments and the justification of these in our [Sustainability Report](#).

Materiality Assessment and Stakeholder Engagement

According to the Global Reporting Initiative (GRI), materiality is a way to assess the topics that have a direct or indirect impact on an organization's ability to create, preserve or erode economic, environmental and social value for itself, its stakeholders and society at large.

Materiality is a crucial step in defining our sustainability program. With so many topics that could be covered, conducting a materiality assessment allows us to focus our reporting on topics that reflect the economic, environmental and social impacts that are the most significant to our strategy and business operations, and to our stakeholders.

ADM engaged a reputable professional services firm to undertake an updated formal materiality assessment to guide our sustainability strategy in the coming years. Although this year's Corporate Sustainability Report and priorities are based on the previous materiality assessment, we are presenting the refreshed matrix in order to inform all stakeholders of where we are going.

The assessment team applied its knowledge of the GRI methodology and our industry to select stakeholders for engagement based on the selection criteria of responsibility, influence, proximity, dependency, and representation. Working with ADM, the firm interviewed, surveyed, and researched publicly available information for a variety of internal and external stakeholders.

The following stakeholder groups were included as part of the assessment:

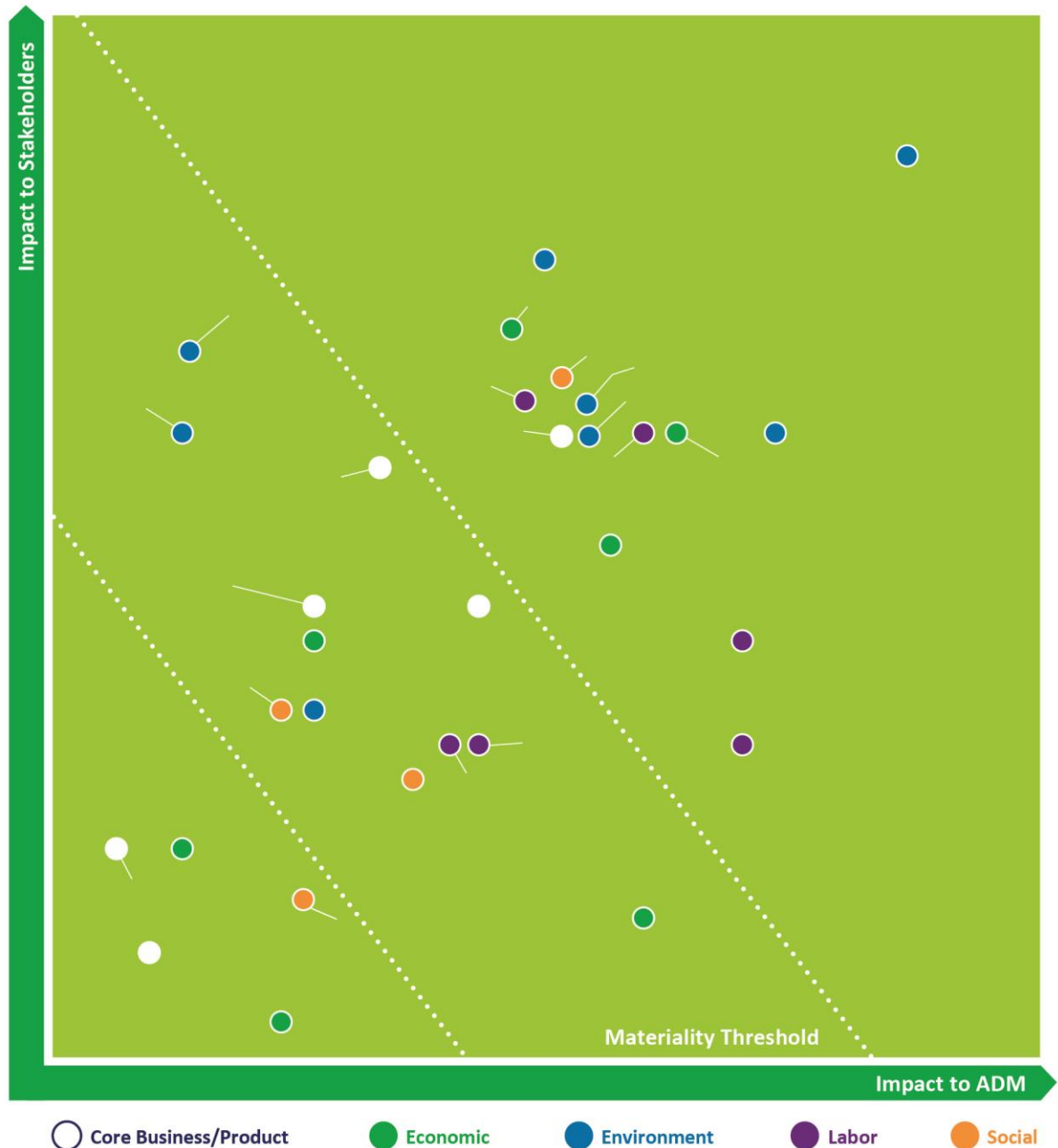
- ADM leadership
- Investors
- Customers
- Employees
- Civil society/non-governmental organizations (NGOs)

At the outset of the assessment, informed by the current landscape and with a forward-looking lens, the firm and ADM revised previous topic names and definitions. Consequently, some topics were disaggregated or consolidated to better reflect the way ADM manages the issues such as separating "Biodiversity" from "Land Use" and renaming the latter to "Deforestation & Conversion." Through the process, new topics were also identified, including but not limited to: "Transparency," "Information & Cyber Security," "Tax Strategy," and "Alternative Products & Green Chemistry."

The assessment results indicate several key topics that are consistent across all stakeholder groups as critical importance: "GHG Emissions," "Deforestation & Conversion,"



“Governance,” and “Water Management.” Although these are critical to manage, the other topics on the matrix are also important to ADM and our stakeholders.



We recognize that these priorities can change rapidly, so we will continue to monitor and adjust our focus as informed by ongoing stakeholder engagement via customer feedback, NGO inquiries, and dialogue with stakeholders. Any interested party can reach out to us at sustainability@adm.com. All of these touchpoints help direct our sustainability programs.





Goals, Targets and KPIs

The United Nations Development Programme created the Sustainable Development Goals (SDGs) as a universal call to action to end poverty, protect the planet and ensure that all people enjoy peace and prosperity. The 17 SDGs provide clear guidelines and targets for countries and governments, although industry still has a vital role to help achieve these goals. At ADM, we have undertaken a mapping exercise to determine which SDGs align with our business objectives and in turn, allow us to make the greatest contribution toward achievement. Specifically, we are focusing our efforts toward Zero Hunger, Clean Water and Sanitation, Decent Work and Economic Growth, Climate Action, and Life On Land.



In our Sustainability report you can find the highlights of some of our activities that support our commitment to these SDGs, as well as some of our other company goals. The commitments under the Code of Conduct

Commitments under the EU Code of Conduct on Responsible Food Business and Marketing Practices

Since 2011, we are committed to improvements in energy and water usage, greenhouse gas emissions and waste to landfill rate. We achieved all targets from our original “15x20” plan (15 percent reduction in each category until 2020) ahead of schedule, and we know we can do even more. Therefore we stand with the European Commission, committing to:

A climate neutral food chain in Europe by 2050

We have a large economic footprint and we know it is important to reduce greenhouse gas (GHG) emissions related to our business activities and the entire agricultural supply chain. We use internal and external science-based resources to identify opportunities and take action to reduce our GHG emissions globally to meet our commitment to mitigate the effects of climate change. In 2020, we engaged with a leading engineering professional services firm to conduct an in-depth [carbon reduction feasibility study](#) and help us shape our new set of goals to combat climate change.



1. We will go beyond net emissions on our commitment to reduce GHG emissions by pledging an **absolute reduction** in GHG emissions: 25 percent over 2019 baseline by year 2035 (*By comparison, the EU-wide targets have 1990 as baseline*).



2. We commit to reducing energy intensity by 15 percent over 2019 baseline by year 2035.

An optimized circular and resource-efficient food chain in Europe

At ADM, we are committed to improving resource-efficiency within our own operations, including improvements on water management practices and waste from landfill.



We will reduce our water intensity by 10 percent over 2019 baseline by 2035.

Water availability has become a critical issue in the last few years. As we see an increase in regions classified as water scarce or projected to be water scarce in the future, the importance of reducing water consumption and improving water quality is clear. In 2020, we announced our target to reduce water consumption by 10% per ton of product produced at our largest sites by 2035 over a 2019 baseline. In addition, to support the health and wellbeing of the communities where we operate, by 2025, we will develop a global improvement strategy in priority watersheds. This approach will allow us to implement projects where they will be the most impactful.



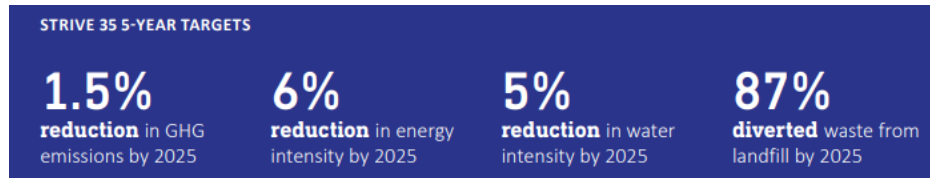
We commit to 90 percent diverted waste from landfill over 2019 baseline by 2035.

In 2020, we announced our new waste diversion goal. We aim to beneficially reuse, recycle or otherwise divert from landfill at least 90% of our waste. To achieve this goal, we have focused on developing a strategy to standardize our waste management and reporting program. We created a Landfill Diversion Team and rolled out our new Strive 35 Waste Management standard operating procedure.





We defined 5-year milestones to keep track of improvement and ensure we reach our goals.



Sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all

At ADM we work to create a diverse and inclusive culture where colleagues feel they belong and are empowered to contribute fully and do their best work.



We reaffirm our pledge to achieve 50 percent gender parity among ADM's senior leadership structure by 2030.

ADM is one of the first 100 companies to join the coalition of business leaders, board members and business academics dedicated to addressing the corporate leadership gap. ADM's commitment focuses on improved gender balance in our global leadership forum by 2030, with the purpose to ensure we create and maintain a respectful culture in which all colleagues feel included and empowered.

ADM has committed to :

- Addressing unconscious bias in the workplace
- Significantly increasing the number of women in senior operating roles, with the near-term goal of at least 30% representation in all leadership groups
- Measuring targets and maintaining accountability by providing regular progress reports
- Basing career progress on business results and performance, rather than physical presence in the office
- Providing sponsors, not just mentors, to women well positioned for long term success

To support this commitment ADM is continuing to drive internal efforts focused on hiring processes, wage gap elimination, internal network development and widespread diversity and inclusion engagement at all levels.





Sustainable sourcing in food supply chains

ADM is fully committed to ending deforestation, and to preserving biodiversity and water resources in our supply chains. This includes holding our suppliers accountable for producing commodities in ways that do not further deforestation in order to reduce impact on climate change. We believe that sustainable, ethical and responsible production by the food industry is critical for curbing global warming, conserving native biodiversity, and upholding the rights of indigenous communities and smallholders.

Natural resources are essential to an abundant future, and we are striving to reduce the impact of our operations and supply chain while making a positive contribution to the wellbeing of people and the health of the planet. Our dedication to sustainable practices results in a stronger ADM and a better world.

ADM is committed to continuous improvement and to adaptation based on the latest science. In March 2021, we released our [Policy to Protect Forests, Biodiversity and Communities](#).

We have revised and launched a new policy to Protect Forest, Biodiversity and Communities to help transform agricultural supply chains.



We aim to eliminate deforestation from all of our supply chains by 2030.



We commit to achieve full traceability of direct and indirect sourcing throughout our soy supply chains in Brazil, Paraguay and Argentina by the end of 2022.

We pledge to promote initiatives to protect native vegetation beyond forests with the aim to end native vegetation conversion in the shortest time possible, reconciling production of soy with environmental, economic and social interests in high risk areas such as the Cerrado and Chaco biomes in South America.

