

Company Name Archer Daniels Midland (ADM)
Industry Agricultural Products (Supply Chain and Own Operations)
Overall Score 17.9 out of 100

Theme Score	Out of	For Theme
2.3	10	A. Governance and Policies
8.1	25	B. Embedding Respect and Human Rights Due Diligence
3.5	20	C. Remedies and Grievance Mechanisms
1.5	25	D. Performance: Company Human Rights Practices
2.5	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2022 Methodology document for the sector concerned. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: General HRs commitment: The Human Rights Policy states: 'We commit to protect and respect the human rights of our employees, those within our value chain, and in the communities in which we operate'. [Human Rights Policy, 2021: assets.adm.com] Score 2 <ul style="list-style-type: none"> Not Met: Commitment to the UNGPs: The Policy also indicates that 'We strive to promote human rights in accordance with the UN Guiding Principles on Business and Human Rights' three pillars [...]. This policy is in accordance with company values and these external publications: [...] UN Guiding Principles on Business and Human Rights'. However, 'to strive to promote in accordance' is not considered a formal statement of commitment according to CHRB wording criteria. [Human Rights Policy, 2021: assets.adm.com] Not Met: Commitment to the OECD Guidelines for Multinational Enterprises
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Company has a commitment to the ILO Core: The Company states that its Human Rights Policy 'is in accordance with company values and these external publications: [...] Fundamental Principles and Rights at Work of the International Labour Organization (ILO)'. [Human Rights Policy, 2021: assets.adm.com] Not Met: Company has an explicit commitment to All four ILO Core: Its The HR Policy includes the following commitments: 'We prohibit discrimination [...] We prohibit the use of all forms of forced labor [...] We prohibit child labor [...] We respect employees' right to join, form or not to join a labor union without fear of reprisal, intimidation, or harassment. Where employees are represented by a

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			<p>legally recognized union, we support establishing a constructive dialogue with their freely chosen representatives. We are committed to bargaining in good faith with such representatives of our employees, and expect our suppliers to do the same.' However, it is not clear whether it is committed to respect the rights of freedom of association and collective bargaining in all contexts and locations (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as the Company indicates that it establishes a constructive dialogue with 'where employees are represented by a legally recognized union'. [Human Rights Policy, 2021: assets.adm.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Company expect suppliers to commit to ILO Core: See below. [Supplier expectation, 09/05/2018: assets.adm.com] & [Human Rights Policy, 2021: assets.adm.com] • Met: Company explicitly list All four ILO for suppliers: The Supplier Expectation document states that 'We expect suppliers to respect freedom of association and collective bargaining, to support diversity and equal opportunity in their workplace, and to promote the health and safety of all parties. Suppliers must also adhere to laws related to working hours, wages, human trafficking, and the prevention of child labor and forced labor. Suppliers are expected to conduct business consistent with ADM's commitment to the environment'. In addition, the Human Rights Policy that includes a no discrimination principle, the Company indicates: 'ADM expects that our direct and indirect suppliers, business partners, agents and consultants uphold these principles'. [Supplier expectation, 09/05/2018: assets.adm.com] & [Human Rights Policy, 2021: assets.adm.com]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to respect H&S of workers: The HR policy states that '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. We expect our suppliers to do the same'. [Human Rights Policy, 2021: assets.adm.com] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: The Policy indicates: '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.' However, no statement committing to respecting the ILO conventions on labour standards on working hours or that workers shall not be required to work more than 48 hours in a regular work week was found. [Human Rights Policy, 2021: assets.adm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expect suppliers to commit to H&S of their workers: The Company states in its Supplier Expectation that 'expect suppliers to promote the health and safety of all parties'. In addition, in its Human Rights Policy it indicates: '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. We expect our suppliers to do the same'. [Supplier expectation, 09/05/2018: assets.adm.com] & [Human Rights Policy, 2021: assets.adm.com] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: Its Supplier Expectation reads: 'Suppliers must also adhere to laws related to working hours'. However, no formal requirement about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by requiring a 48 hours regular working week, and consensual overtime paid at a premium rate. [Supplier expectation, 09/05/2018: assets.adm.com]
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry – land, natural resources and indigenous	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Respect land ownership and natural resources as set out in VGGT • Not Met: Respect land ownership and natural resources as set out in The IFC Performance Standards • Met: Respecting indigenous peoples' rights or ILO Convention No.169 or UN Declaration: In its No deforestation Policy, the Company states: 'We will work throughout our supply chains to achieve the following: [...] Respect Indigenous and Local Community rights to land and resources in accordance with the U.N. Declaration on the Rights of Indigenous Peoples,[...] This policy applies to ADM's own operations and across all supply chains in which ADM operates, including all

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	peoples' rights (AG)		<p>supplier tiers back to the origin from where commodities are sourced, and for all companies/JVs in which ADM holds an ownership stake.' [Policy to Protect Forests, Biodiversity and Communities, 03/2021: assets.adm.com]</p> <ul style="list-style-type: none"> • Met: Expecting suppliers to make these commitments: The HR Policy states that '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.' [Human Rights Policy, 2021: assets.adm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Respecting the right to water: The Company states in its Human Rights Policy: 'We respect the right to access safe and clean drinking water and sanitation in our operations and supply chain'. [Human Rights Policy, 2021: assets.adm.com] • Not Met: Company's policy commits to obtain FPIC: Although the Company indicates that it work with suppliers to achieve respecting Indigenous and Local Community rights to land and resources, and that it respects the rights to access safe and clean drinking water in its supply chain, no statement expecting its suppliers to commit to these rights was found. [Human Rights Policy, 2021: assets.adm.com] & [Policy to Protect Forests, Biodiversity and Communities, 03/2021: assets.adm.com] • Met: Expecting suppliers to make these commitments : See above [Human Rights Policy, 2021: assets.adm.com]
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (AG)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Women's rights: Although the Company's Human Rights Policy includes a provision prohibiting any kind of discrimination, including the one based on gender, no commitment to respect women's rights was found in a suitable source for policy statements under CHRB's revised approach. [Human Rights Policy, 2021: assets.adm.com] • Not Met: Children's rights: Although the Company's Human Rights Policy includes a provision prohibiting Child Labour, no commitment to respect children's rights was found in a suitable source for policy statements under CHRB's revised approach. [Human Rights Policy, 2021: assets.adm.com] • Not Met: Migrant worker's rights • Not Met: Expects suppliers to respect at least one of these rights <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: CEDAW/Women's Empowerment Principles • Not Met: Child Rights Convention/Business Principles • Not Met: Convention on migrant workers • Not Met: Expecting suppliers to respect these rights
A.1.4	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: The Company commits to remedy: The HR Policy states that 'We strive to promote human rights in accordance with the UN Guiding Principles on Business and Human Rights' three pillars: [...] Remedy: Ensure access to remedy through judicial and nonjudicial means'. However, 'strive to promote is not considered a formal statement of commitment according to CHRB wording criteria. The policy also indicates that 'We recognize the role engagement plays in preventing, addressing, and remedying human rights concerns. Where applicable, we strive to engage with employees, communities, civil society and other stakeholders to address risks along our value chain'. However, no formal, direct explicit statement of a commitment to remedy the adverse impacts was found. [Human Rights Policy, 2021: assets.adm.com] • Not Met: Company expect suppliers to make this commitment: In its Policy to Protect Forests, Biodiversity and Communities, the Company indicates: 'we expect our direct and indirect palm oil suppliers to commit to the following: [...] Cooperate with ADM and all parties necessary to enable the provision of access to fair and just remediation'. However, such requirement was not found in the Supplier Expectation document, that applies to all suppliers. [Policy to Protect Forests, Biodiversity and Communities, 03/2021: assets.adm.com] & [Supplier expectation, 09/05/2018: assets.adm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Collaborating with other remedy initiatives • Not Met: Work with suppliers to remedy impact: In its Policy to Protect Forests, Biodiversity and Communities, the Company indicates: 'we expect our direct and indirect palm oil suppliers to commit to the following: [...] Cooperate with ADM and all parties necessary to enable the provision of access to fair and just remediation'. However, no commitment statement from the Company to work with suppliers to

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			remedy adverse impacts which are directly linked to the company's operations, products or services was found, including suppliers beyond this context. [Policy to Protect Forests, Biodiversity and Communities, 03/2021: assets.adm.com]
A.1.5	Commitment to respect the rights of human rights defenders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Zero tolerance attacks on HRs Defenders (HRDs): The Company states in its Human Rights Policy: 'ADM is committed to the protection of Human Rights Defenders, whistle-blowers, complainants, and community spokespersons, including those defined in the RSPO Human Rights Defenders Policy.' [Human Rights Policy, 2021: assets.adm.com] • Met: Company expect suppliers to make this commitment: Although, its Supplier Expectation document does not include a provision related to human rights defenders, the Company indicates in its Human Rights Policy, that it 'expects that our direct and indirect suppliers, business partners, agents and consultants uphold these principles'. [Human Rights Policy, 2021: assets.adm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Work with HRD to create safe and enabling environment

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Board level responsibility for HRs: The Company indicates that 'the Sustainability and Corporate Responsibility Committee ("Sustainability Committee") of the Board has direct oversight responsibility for the company's objectives, goals, strategies and activities relating to sustainability and corporate responsibility matters. The Sustainability Committee also oversees the company's compliance with sustainability and corporate responsibility laws and regulations, assesses performance relating to industry benchmarks, and assists the Board of Directors in ensuring that the company operates as a sustainable organization and responsible corporate citizen in order to enhance shareholder value and protect ADM's reputation.' Human Rights is included in the sustainability strategy. [Corporate Sustainability Report 2020, 2021: assets.adm.com] • Not Met: Describe HR expertise of Board member <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Speeches/letters by Board members or CEO
A.2.2	Board responsibility	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Board/Committee review HRs strategy: According to its Sustainability and Corporate Responsibility Committee Charter: 'The Committee shall meet at least annually and otherwise as the members of the Committee deem necessary or appropriate [...] The Committee shall oversee (a) the Company's objectives, goals, strategies, and activities relating to sustainability and corporate responsibility, including workplace safety, process safety, environmental, social well-being, diversity and inclusion, corporate giving, and community relations, (b) the Company's compliance with sustainability and corporate responsibility laws and regulations, and (c) the Company's performance relating to its sustainability and corporate responsibility goals and industry benchmarks. The Committee shall receive and review reports from management regarding (a) the Company strategies and activities to support the Company's sustainability and corporate responsibility objectives, (b) the Company's compliance with sustainability and corporate responsibility laws and regulations, (c) the Company's performance relating to its sustainability and corporate responsibility goals and industry benchmarks, (d) significant risks to, and the physical security of, the Company's facilities and employees and the public, (e) significant sustainability and corporate responsibility litigation and regulatory proceedings in which the Company is or may become involved, (f) trends, risks, legislations, regulations, public policies, judicial decisions, treaties, protocols, or medical or scientific developments relating to sustainability and corporate responsibility that may have a material effect on the Company's business, and (g) the Company's relationships with key sustainability and corporate responsibility stakeholders and the issues raised by those stakeholders.' [Sustainability and Corporate Responsibility Committee Charter, 2019: s1.q4cdn.com] • Not Met: Examples/trends re HR discussion in the last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions

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A.2.3	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Incentives for at least one board member: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. • Not Met: At least one key HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other board performance criteria
A.2.4	Business model strategy and risks	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board process to review business model and strategy: According to its Sustainability and Corporate Responsibility Committee Charter: 'The Committee shall oversee (a) the Company's objectives, goals, strategies, and activities relating to sustainability and corporate responsibility, including workplace safety, process safety, environmental, social well-being, diversity and inclusion, corporate giving, and community relations, (b) the Company's compliance with sustainability and corporate responsibility laws and regulations, and (c) the Company's performance relating to its sustainability and corporate responsibility goals and industry benchmarks. The Committee shall receive and review reports from management regarding (a) the Company strategies and activities to support the Company's sustainability and corporate responsibility objectives, (b) the Company's compliance with sustainability and corporate responsibility laws and regulations, (c) the Company's performance relating to its sustainability and corporate responsibility goals and industry benchmarks, (d) significant risks to, and the physical security of, the Company's facilities and employees and the public, (e) significant sustainability and corporate responsibility litigation and regulatory proceedings in which the Company is or may become involved, (f) trends, risks, legislations, regulations, public policies, judicial decisions, treaties, protocols, or medical or scientific developments relating to sustainability and corporate responsibility that may have a material effect on the Company's business, and (g) the Company's relationships with key sustainability and corporate responsibility stakeholders and the issues raised by those stakeholders'. However, no further information describing the process to discuss and review its business model and strategy for inherent risks to human rights at board level or a board committee. Current evidence focuses on how the Board Committee oversees sustainability issues (which include human rights) [Sustainability and Corporate Responsibility Committee Charter, 2019: s1.q4cdn.com] • Not Met: Describe frequency and triggers for reviewing <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions decided

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a: See indicator A.1.2.a • Met: Senior responsibility for HR implementation and decision making: The Company CSR 2020 indicates: 'Vice President, Chief Sustainability Officer (CSO): Leads ADM's sustainability efforts; Reports metrics quarterly to ADM Board of Directors; Meets quarterly with ADM Board of Directors' Sustainability and Corporate Social Responsibility Committee; Reports regularly to ADM leadership'. According this document Human Rights Policy is part of the Sustainability Commitments and Policies (p 11) [Corporate Sustainability Report 2020, 2021: assets.adm.com] & [Corporate Sustainability Report 2019, 2020: assets.adm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How it assigns Day-to-day responsibility: In addition, it indicates: 'Regional sustainability teams — along with the corporate sustainability team — support the Chief Sustainability Officer to drive sustainability efforts in our facilities and supply chains around the world. Our sustainability efforts are also supported by Centers of Excellence (CoE) that drive efficiency programs in their areas of focus such as the Utilities CoE, Diversity, Equity and Inclusion CoE, and Environmental, Health and Safety CoE.' [Corporate Sustainability Report 2020, 2021: assets.adm.com] & [Corporate Sustainability Report 2019, 2020: assets.adm.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Day-to-day resources and expertise allocation in own ops: The Company has provided comments to CHRB regarding this indicator. However, this document or its content has not been found in publicly available sources. • Not Met: Resources and expertise allocation in the supply chain
B.1.2	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Senior manager incentives for human rights • Not Met: At least one key HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other senior management performance
B.1.3	Integration with enterprise risk management	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR risks is integrated as part of enterprise risk system: The Company indicates that Sustainability risk management, including climate change and deforestation, is integrated into the multi-disciplinary companywide enterprise risk management (ERM) process. Each quarter, the ERM Sustainability subgroup reviews the risk matrix. Previously identified risks are discussed to ensure proper focus and time is spent discussing and assessing emerging risks.' In addition, in its Human Rights Policy, it states: 'The ADM Enterprise Risk Management (ERM) Team conducts quarterly reviews of all sustainability risks, including human rights risks'. [Corporate Sustainability Report 2020, 2021: assets.adm.com] & [Human Rights Policy, 2021: assets.adm.com] • Met: Provides an example: In addition, it states that 'The risk matrix includes quantitative review of impact, mitigation, and residual risk as well as qualitative information about risk categories, warning periods, mitigation strategies and effectiveness. [...] Various risk types are included in the analysis including [...] Legal impacts pose a relevant risk to the company and are always assessed. For example, palm from Indonesia/Malaysia and soy from Brazil are at risk of being sourced from growers who are in violation of labor laws or deforestation regulations. [...] ; [Corporate Sustainability Report 2020, 2021: assets.adm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Audit Ctte or independent risk assessment: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. [Corporate Sustainability Report 2019, 2020: assets.adm.com]
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a: See indicator A.1.2.a • Met: Communicates its policy to all workers in own operations: The Company states in its Modern Slavery Statement that: 'ADM Colleagues receive regular Code of Conduct training reinforcing the duty to know and abide by our Company's core values, policies, procedures and guidelines'. In addition, in its Human Rights Implementation H2 2018 Progress Report it indicates that 'In H2 2018, the ADM Board of Directors and employees of new acquisitions received human rights program training using updated slides. The new training information is simplified and standardized to be used in all geographies. We will continue to ensure new hires and employees of new acquisitions receive training on our human rights program and Code of Conduct'. [Progress reports on HR, 2018-2020: adm.com] & [Modern Slavery Statement 2018, 28/03/2019: assets.adm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communication of policy commitments to stakeholder: The Company states in its Human Rights Policy: 'This policy will be communicated to suppliers through direct communication, posting in areas that are visible to suppliers, and inclusion in supplier contracts and/or incorporation via ADM's Supplier Expectations.' However, no further information describing how the Company communicates its policy commitment to affected stakeholders was found. [Human Rights Policy, 2021: assets.adm.com] • Not Met: How policy commitments are made accessible to audience: Although stakeholders have grievance channels available to communicate issues related to the Company's human rights policy, it is not clear how it communicates these policy commitments to stakeholders, including local communities and potentially affected stakeholders. [Grievances and Resolutions - Protocol, N/A: assets.adm.com] & [Human Rights Policy, 2021: assets.adm.com]
B.1.4.b	Communication /dissemination of policy commitment(s)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2.a • Not Met: Steps to communicate policy commitments to supply chain: The Company states in its Human Rights Policy: 'This policy will be communicated to

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	to business relationships		<p>suppliers through direct communication, posting in areas that are visible to suppliers, and inclusion in supplier contracts and/or incorporation via ADM's Supplier Expectations.' However, no further information describing how it communicates its Policy down its supply chain (including suppliers' supply chain) was found. [Human Rights Policy, 2021: assets.adm.com]</p> <ul style="list-style-type: none"> • Not Met: Requires suppliers to communicate policy requirements <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: The Company states in its Human Rights Policy: 'This policy will be communicated to suppliers through direct communication, posting in areas that are visible to suppliers, and inclusion in supplier contracts and/or incorporation via ADM's Supplier Expectations.' [Human Rights Policy, 2021: assets.adm.com] • Not Met: Company requires suppliers to cascade down to their suppliers
B.1.5	Training on Human Rights	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a • Met: How workers are trained on HR policy commitments: The Company reports in its MSA 2020: '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 addition, the HR policy implementation report states that 'In 2021, we published an update of the policy to improve clarity and align with the United Nations Guiding Principles (UNGP) framework. We also ensured that 100% of our colleagues completed human rights training'. [Statement on the California Transparency in Supply Chains Act and UKModern Slavery Act 2020, 06/21: assets.adm.com] & [Human Rights Policy Implementation - Progress Report 2021, 2022: adm.com] • Not Met: Trains relevant managers including procurement: See above description that 100% of employees are trained. However, this subindicator looks for evidence of how relevant workers, including those working on procurement, receive specific human rights training relevant to their role. [Human Rights Policy Implementation - Progress Report 2021, 2022: adm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a: See indicator A.1.2.a • Not Met: Meets both requirements under score 1: See above • Not Met: Trains suppliers to meet company's HR commitment • Not Met: Disclose % trained
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a • Met: Monitoring implementation of HR policy commitments across global ops and supply chain: In its Human Rights Policy Implementation Progress Report 2019, the Company states: 'ADM is a member of Sedex and hosts responsible sourcing audits conducted by 3rd party auditors at our facilities around the globe. At the ADM facilities visited in 2018, 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. No human trafficking was observed. All findings were considered to be minor and low risk. ADM sustainability, legal, operations, and compliance teams work with the locations to identify and implement corrective actions.' In addition, in its MSA 2020, it reports: 'In 2020, ADM leveraged its SEDEX membership to review select upstream suppliers' SAQs, audits, and corrective action plan reports to further our supply chain risk assessment. Based on our supplier risk assessment, in 2021 ADM will focus on reviewing Sedex SAQs and audits for suppliers of fruit and fruit products and suppliers in Asia.' [Human Rights Policy Implementation - Progress Report 2019, 2019: assets.adm.com] & [Statement on the California Transparency in Supply Chains Act and UKModern Slavery Act 2020, 06/21: assets.adm.com] • Not Met: Proportion of supply chain monitored • Not Met: Describe how workers are involved in monitoring <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a: See indicator A.1.2.a • Not Met: Describes corrective action process • Not Met: Disclose findings and number of corrective action
B.1.7	Engaging and terminating	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: HR affects selection of suppliers: The Company indicates: 'ADM expects its suppliers to fully comply with applicable laws and to adhere to internationally

Indicator Code	Indicator name	Score (out of 2)	Explanation
	business relationships		<p>recognized environmental and social standards, in addition to its Code of Conduct and policies. ADM will partner with suppliers to further develop their sustainability performance when needed. Where the company maintains long-term or recurring buying relationships with producers or primary processors, ADM will support these suppliers in achieving compliance'. However, it is not clear how human rights performance affects selection of suppliers. [Managing Supplier Non-compliance, N/A: adm.com]</p> <ul style="list-style-type: none"> • Met: HR affects on-going supplier relationships: The Company states in its Human Rights Policy: 'Upon discovery of any supplier, contractor, or business partner that does not adhere to these commitments or that misrepresents the conditions under which crops, goods or services have been produced, ADM will take appropriate action. We expect participation in investigations of violations and disclosure of actions to remedy the situation. If the party does not demonstrate a good-faith effort to address issues in a timely manner, actions may include exclusion from new direct contracts and/or termination of relationship.' [Human Rights Policy, 2021: assets.adm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe positive incentives offered to respect human rights • Not Met: Working with suppliers to meet HR requirements
B.1.8	Approach to engagement with affected stakeholders	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: The Company states that it identified its stakeholders as part of the Company's regular materiality assessment with Deloitte Advisory. The Company conducted secondary research, interviews or survey to identify various stakeholders including employees, trade associations or Civil Society. In addition, it indicates in its Corporate Sustainability Report 2021: 'Following the guidelines from the Global Reporting Initiative (GRI), we use a third-party to conduct a formal assessment to identify and prioritize our key sustainability topics that reflect our most significant impacts to the economy, environment, and people, including human rights. [...] The assessment team applied its knowledge of the GRI methodology and our industry to select an initial set of topics for discussion. During the engagement phase, stakeholders provided additional topics relevant to ADM either due to impact to the company or impact to stakeholders. The firm selected 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 from a variety of internal and external stakeholders, including ADM leadership, investors, customers, employees, and non-governmental organizations (NGOs).' [Corporate sustainability report 2018, 2018: assets.adm.com] & [Corporate Sustainability Report 2021, 2022: adm.com] <ul style="list-style-type: none"> • Not Met: Discloses stakeholders that HRs may be affected • Not Met: Provides two examples of engagement with stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HR issues • Not Met: Describe how views influenced company's HR approach

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Identifying risks in own operations: The Company indicates in its CSR 2019 that 'For the past two years, ADM has worked with ELEVATE to support its Human Rights Action Plan to conduct a supply chain risk analysis. ELEVATE initially took a two-phased approach to segment ADM's complex and expansive supply chain to gain deeper insight into inherent risks and challenges with sourcing based on country and commodity. In the third phase, the analytical scope was expanded to include the vanilla bean supply chain after acquisition of Rodelle'. In addition, in its CSR 2020, it reports: 'ADM has a direct impact on numerous communities around the globe through our sourcing practices, and we focus on mitigating threats in areas at higher risk for human rights violations. Using the United Nations Human Development Index (HDI) and third-party risk assessments, we have prioritized those higher-risk geographies and commodities within our global reach. Although the global pandemic created many challenges in 2020, we were able to move forward and implement the next phase of our human rights program – onsite assessment. Working with ELEVATE, we identified our vanilla supply chain in Madagascar as a high risk.' However, no evidence found describing how the Company identifies risks in its own operations, as evidence seems to refer only in the supply chain. [Corporate Sustainability Report 2019, 2020: assets.adm.com] & [Corporate Sustainability Report 2020, 2021: assets.adm.com] • Met: Identifying risks through relevant business relationships: The Company indicates that it 'worked with ELEVATE to support its Human Rights Action Plan to conduct a supply chain risk analysis in 2018-2019. ELEVATE initially took a two-phased approach to segment ADM's complex and expansive supply chain. In the third phase, the analytical scope was expanded to include the vanilla bean supply chain after acquisition of Rodelle'. In addition, in its CSR 2020, it reports: 'ADM has a direct impact on numerous communities around the globe through our sourcing practices, and we focus on mitigating threats in areas at higher risk for human rights violations. Using the United Nations Human Development Index (HDI) and third-party risk assessments, we have prioritized those higher-risk geographies and commodities within our global reach. [...] in 2020, we were able to move forward and implement the next phase of our human rights program – onsite assessment. Working with ELEVATE, we identified our vanilla supply chain in Madagascar as a high risk.' Finally, in its Modern Slavery Statement, the Company states: '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 two phases: 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. Micro (site/farm) level risks– using the results from phase one, ELEVATE is assessing eight commodities (corn, soy, wheat, palm, apples, macadamias, peanuts and pecans) in 20 countries from 1,132 suppliers'. [Human Rights Policy Implementation - Progress Report 2019, 2019: assets.adm.com] & [Modern Slavery Statement 2018, 28/03/2019: assets.adm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: The Company started a 6 phase process. The first two were reported completed in the first half of 2016, including analysing global human rights issues and identification of high risk geographies, and analysing the supply chain, identifying priority geographies, activities and facilities with respect to issues and risks. According to its latest Progress Report 2019 the Company keeps working on its human right risk assessment: 'After completing a macro-level supply chain risk assessment, ELEVATE worked with ADM to conduct an in-depth supplier analysis. This second part of the assessment focused on specific commodities. However, no further evidence was found showing that the Company consulted with affected stakeholders as part of its risk identification process. [Progress reports on HR, 2018-2020: adm.com] & [Human Rights Policy Implementation - Progress Report 2019, 2019: assets.adm.com] • Not Met: Triggered by new circumstances • Not Met: Describes risks identified

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.2	Assessing human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describe process for assessment of HR risks and discloses salient HR issues: No evidence found in relation to due diligence human rights risk and impact assessment covering own direct operations. [Modern Slavery Statement 2018, 28/03/2019: assets.adm.com] • Met: How process applies to supply chain: As indicated in the previous indicator, the Company conducted a supply chain risk assessment of human rights in two phases: '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. Micro (site/farm) level risks– using the results from phase one, ELEVATE is assessing eight commodities (corn, soy, wheat, palm, apples, macadamias, peanuts and pecans) in 20 countries from 1,132 suppliers'. Analysis of the vanilla supply chain resulted in suppliers' scores being categorized into four quadrants based on inherent risks in the country-commodity combination and the leverage ADM has based on factors such as procurement volume and spend. Based on the sourcing geography vanilla suppliers are considered high or extreme risk. Based on ADM's relative leverage, vanilla suppliers are considered high leverage. ELEVATE recommended focus on the highest risk and highest leverage segment for risk management and mitigation. In 2020, ADM is committed to focusing first on these suppliers, particularly with regards to developing vanilla-specific sourcing policies and piloting supplier visibility and monitoring programs.' [Modern Slavery Statement 2018, 28/03/2019: assets.adm.com] & [Human Rights Policy Implementation - Progress Report 2019, 2019: assets.adm.com] • Met: Public disclosure of the results of HR assessment: The Company indicates that that 'agricultural production, particularly in countries with lower HDI values, has a higher risk of using slave and child labor, not paying living wages, having unsafe working conditions and violating additional rights. These practices threaten the development and livelihood of local communities'. [Corporate sustainability report 2018, 2018: assets.adm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: How it involved affected stakeholders in the assessment
B.2.3	Integrating and acting on human rights risks and impact assessments	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Action Plans to mitigate risks • Not Met: Description of how global system applies to supply chain • Met: Example of actions decided on at least 1 salient HR issues: Regarding Child Risk Assessment Framework (CRAF) in Malaysia it states that 'CRAF aims to support palm oil producers in Malaysia to: identify potential risks faced by children in palm oil plantations; develop policies, procedures and interventions to minimize risk by responding in a timely manner to the identified potential risks; remediate adverse impacts discovered; review whether adequate measures have been taken to prevent, eliminate or reduce these risks; and make oil palm plantation sites and the surrounding areas a safe place to work and to live for children and for young people.' It also reports on its SAVAN project: 'In 2020, guided by the results from the risk assessment, ADM focused first on these suppliers [vanilla suppliers], particularly with regards to developing vanilla-specific sourcing policies and piloting supplier visibility and monitoring programs. [...] In 2020, ADM focused its Respect for Human Rights implementation efforts on its vanilla supply chain, and specifically its joint venture, SAVAN. Partnering with ELEVATE, ADM: Developed a vanilla sourcing protocol; Designed a self-assessment questionnaire (SAQ) based on the protocol to allow growers to provide information on practices and conditions; Conducted outreach and deployed SAQ receiving responses from 1,000 growers; and Audited 63 growers and associations to assess conditions and validate SAQ responses'. [Human Rights Implementation Policy - Progress Report 2020, 2021: assets.adm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions
B.2.4	Tracking the effectiveness of actions to respond to human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: System for tracking or monitor if actions taken are effective: The Company has provided additional comment/source to CHRB regarding this indicator. However, evidence was not material. • Not Met: Lessons learnt from checking system effectiveness

Indicator Code	Indicator name	Score (out of 2)	Explanation
	risks and impacts		Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Involve stakeholders in evaluation of actions taken
B.2.5	Communicating on human rights impacts	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Provides two examples of comms with stakeholders: The Company discloses a Grievance and resolution log with stakeholders. The log includes the issue at stake, who reported it, the relationship with the Company and the progress that is being made in each case. Although it does not describe how it specifically reaches each affected stakeholder during the process, the process followed is publicly disclosed and periodically updated (last update as of this review was May 2022). [Grievance and resolution - Log May 2022, 05/2022: adm.com] Score 2 <ul style="list-style-type: none"> • Not Met: Describe challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Code of conduct describes different channels for communicating grievances and raise concerns for employees, including local resources, appropriate representatives, the Compliance and the ADM Helpline. The helpline is operated by a third party and is available worldwide on the website and it provides a list of phone numbers and online reporting. For employees in EU countries, the helpline is only available for reporting financial and corruption issues. If the report comes from these countries, and the employee wishes to report other type of matters, then the contact point is the regional compliance team, the human resources, or the legal department. In addition, the Company discloses on its website the contact of the VP of compliance. [Code of Conduct, 2017: assets.adm.com] Score 2 <ul style="list-style-type: none"> • Met: Channel is available in all appropriate languages and workers aware: The Company indicates in its CSR 2020: 'Employees are encouraged to voice concerns or ask questions through multiple channels, including by talking with their supervisors, Human Resources, or Compliance, or at any time through additional reporting channels such as The ADM Way Helpline, which is available by phone or web in more than 30 languages. Reporting via the Helpline can be done anonymously, where permitted by law. [...] In 2020, all employees completed required compliance training on topics such as anti-corruption, conflicts of interest, data privacy and protection, and speaking up.' [Corporate Sustainability Report 2020, 2021: assets.adm.com] • Met: Describe how workers in the supply chain have access to grievance mechanism: The Supplier code states that to report potential misconducts 'suppliers may direct questions or report concerns to ADM via postal email [...] email[...] telephone [...] or online [...] Reports may be made anonymously where permitted by law. [Supplier expectation, 09/05/2018: assets.adm.com] • Not Met: Expect Suppliers to convey expectation to their own suppliers
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Grievance mechanism for community: In the company's 'Grievances and Resolutions Protocol' individuals/communities can raise concerns. The document states the following: 'We welcome correspondence from any external parties, including individuals, government organizations and non-governmental organizations, regarding the implementation of and compliance with our Commitment to No-Deforestation and our Human Rights Policy.' In addition, the Company states in its Human Rights Policy: 'Stakeholders, including ADM employees, supply chain workers, and community members, who have issues or concerns related to the implementation of our policies are encouraged to contact the ADM Way Helpline at TheADMWayHelpline.com. Where local law permits, concerns can be reported anonymously.' [Grievances and Resolutions - Protocol, N/A: assets.adm.com] & [Human Rights Policy, 2021: assets.adm.com] Score 2 <ul style="list-style-type: none"> • Not Met: Describes accessibility and local languages and stakeholder awareness: The ADM Way Helpline telephone service is free. It is available 24 hours a day, seven days a week to those of us located in countries that have available access codes (see the back of our Code for details). Its operators speak nearly all languages'. No further evidence was found describing how the Company ensures

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>that all affected external stakeholders at its own operations are aware of it. [Grievances and Resolutions - Protocol, N/A: assets.adm.com] & [Human Rights Policy, 2021: assets.adm.com]</p> <ul style="list-style-type: none"> • Not Met: Communities access mechanism direct or through suppliers • Not Met: Expect supplier to convey expectation to their own suppliers
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Engages users to create or assess system • Not Met: Examples (at least two) of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Engages with potential or actual users on the improvement of the mechanism • Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Response timescales and how complainants will be informed: The Company indicates in the FAQ of its Ethics Point website: 'The length of investigations depends on several factors, including the complexity of issues, the number of issues raised, and availability of persons involved for investigations. The Compliance team endeavours to complete all investigations expediently, and when possible, within 30 days. [...] At the end of your telephone call or web-based report, EthicsPoint will provide you with a report key and ask you to create a password. You may call the Helpline or visit the EthicsPoint website periodically after you make your initial report. At that time, you may check the progress of your report or learn whether any additional information is needed from you to address your concern.' In addition, the Company presents in its Grievance and resolutions protocol 2021 a workflow detailing the timescale of the grievance process (2 weeks since issue reception until first evaluation and engagement, and then 6 weeks for investigation and management of grievance). [Grievance mechanism website, N/A: secure.ethicspoint.com] & [Grievance and resolutions - Protocol 2021, 2021: adm.com] • Not Met: Describe support (technical, financial, etc) available for equal access by complainants <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Escalation to senior/independent level
C.5	Prohibition of retaliation for raising complaints or concerns	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation: On the website of the grievance mechanism is stated that 'ADM will not tolerate retaliation against colleagues who raise concerns, report misconduct, or ask for advice in good faith. Any instance of retaliation against colleague for reporting a concern in good faith is itself a violation of our Code, and should be reported'. In addition, on its website section Compliance and Ethics, it indicates: 'Reporting via the Helpline can be done anonymously, where permitted by law. ADM does not tolerate any form of retaliation for making a good-faith report of actual or potential misconduct. The ADM Way Helpline may also be used by stakeholders outside of ADM to raise questions or voice concerns.' [Grievance mechanism website, N/A: secure.ethicspoint.com] & [Compliance and Ethics, N/A: adm.com] • Not Met: Practical measures to prevent retaliation: The Company discloses that 'If you wish to make a report via the ADM Way Helpline, you may share your name or stay anonymous, where local law allows'. In addition, the Company states in its Human Rights Policy: 'ADM is committed to the protection of Human Rights Defenders, whistle-blowers, complainants, and community spokespersons, including those defined in the RSPO Human Rights Defenders Policy.' However, it is not clear what are the company's practical measures to prevent retaliation in places where the local law does not allow to make anonymous complaint. [Code of Conduct, 2017: assets.adm.com] & [Human Rights Policy, 2021: assets.adm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company indicate it will not retaliate against workers/stakeholders • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders
C.6	Company involvement with state-based judicial and non-judicial	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Complainants not asked to waive rights • Not Met: Company does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)

Indicator Code	Indicator name	Score (out of 2)	Explanation
	grievance mechanisms		
C.7	Remedying adverse impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes how remedy has been provided • Not Met: Says how it would provide remedy for victims if no adverse impact identified Score 2 <ul style="list-style-type: none"> • Not Met: Changes to systems, processes and practices to stop similar impact • Not Met: Describe approach to monitoring implementation of agreed remedy • Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Number grievances filed, addressed or resolved and outcome achieved: The Company reports every year a document with data about the practical operation of the grievance mechanism, including allegations of violations of commitment to No Deforestation or Human Rights Policy. This document informs if the issue is filed, addressed or resolved and last update. Also, the Company reports that 'In 2020, we received a total of 968 reports, concerning topics like employee relations, environmental, health and safety (EHS), diversity, equal opportunity and respect in the workplace, and misuse or misappropriation of assets or information. We log and track all reports we receive. Each is classified by type and then assigned to an investigator to conduct an independent and objective investigation. If an allegation is substantiated, we implement corrective actions which can include coaching and counselling, process or control improvement, verbal or written warnings, or termination.' However, no evidence found of the number of reports either addressed or resolved. [Compliance and Ethics, N/A: adm.com] & [Grievance-and-Resolution, 2022: assets.adm.com] Score 2 <ul style="list-style-type: none"> • Not Met: How lessons from mechanism improve management system • Not Met: Evaluation of the channel/mechanism and changes made as result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.a	Living wage (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Pays living wage or sets target date • Not Met: Describes how living wage determined Score 2 <ul style="list-style-type: none"> • Not Met: Achieved paying a living wage • Not Met: Definition of living wage reviewed with unions
D.1.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Discloses timebound target for suppliers to pay living wage or include in code or contracts: The human rights policy, which also applies to suppliers, indicates that it expects standards that include 'compensate workers in accordance with all applicable local laws and regulations including those related to minimum wage and overtime pay'. However, no further detailed found in this or other policies affecting suppliers in relation with living wage guidelines (basic and discretionary income for workers and their families). [Human Rights Policy, 2021: assets.adm.com] & [Supplier expectation, 09/05/2018: assets.adm.com] Score 2 <ul style="list-style-type: none"> • Not Met: Improving living wage practices of suppliers • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress
D.1.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Avoids business model pressure on HRs (purchasing practices) • Not Met: Practices adopted to pay suppliers in line with agreed timeframes • Not Met: Review own operations to mitigate negative impact Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Examples of how it assessed, addressed and change purchasing practices

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.3	Mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The Company reports in its MSA 2021: 'In 2020, ADM continued to map our South American soybean supply chain and implement action plans that incorporate elements of our Human Rights Policy. [...] Since 2015 ADM has been working with The Earthworm Foundation (EF), formerly The Forest Trust, a global environmental not-for-profit organization, to map our palm oil supply chain and create action plans that incorporate elements of our Human Rights Policy.' However, no further information was found about a generalized mapping process that involved all direct and indirect suppliers. [Statement on the California Transparency in Supply Chains Act and UKModern Slavery Act 2020, 06/21: assets.adm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP and why • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities
D.1.4.a	Prohibition of child labour: Age verification and corrective actions (in own production or manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Does not use child labour: The Company states in its Human Rights Policy: 'We prohibit 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'. [Human Rights Policy, 2021: assets.adm.com] • Not Met: Age verification of workers recruited: The Company has provided comments to CHRB regarding this indicator. However, this document or its content has not been found in publicly available sources. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remediation if children identified
D.1.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Child Labour rules in codes or contracts: In the HR policies there is a clear prohibition of child labour which is also in the supplier expectations but it does not have guidelines on verification of age and remediation programmes [Human Rights Policy, 2021: assets.adm.com] & [Supplier expectation, 09/05/2018: assets.adm.com] • Met: How working with suppliers on child labour: The Company reports in its MSA 2021: 'In 2017, ADM supported a multi-stakeholder workshop, "Children in the Plantations of Sabah: Stakeholder Consultation," co-convened by The Forest Trust, Wilmar, ADM, and Nestlé. Part of ADM's funding support to the Earthworm Foundation (EF) went toward creating the Child Risk Assessment Framework(CRAF). CRAF aims to support palm oil producers in Malaysia to: identify potential risks faced by children in palm oil plantations; develop policies, procedures and interventions to minimize risk by responding in a timely manner to the identified potential risks; remediate adverse impacts discovered; review whether adequate measures have been taken to prevent, eliminate or reduce these risks; and make oil palm plantation sites and the surrounding areas a safe place to work and to live for children and for young people'. See indicator B.2.3 for additional info. [Statement on the California Transparency in Supply Chains Act and UKModern Slavery Act 2020, 06/21: assets.adm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made
D.1.5.a	Prohibition of forced labour: recruitment fees and costs (in own production or manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Job seekers and workers do not pay recruitment fee: The Human rights policy reads: 'We prohibit 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 [Human Rights Policy, 2021: assets.adm.com] • Not Met: Commits to fully reimbursing if they have paid <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How practices are implemented and monitored for agencies, labour brokers or recruiters

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Debt and fees rules in codes or contracts: The Human rights policy reads: 'We prohibit 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.' The Company indicates that it expects that its 'direct and indirect suppliers, business partners, agents and consultants uphold these principles [...] This policy will be communicated to suppliers through direct communication, posting in areas that are visible to suppliers, and inclusion in supplier contracts and/or incorporation via ADM's Supplier Expectations.' [Human Rights Policy, 2021: assets.adm.com] & [Supplier expectation, 09/05/2018: assets.adm.com] • Not Met: How working with suppliers on debt & fees <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees • Not Met: Analysis of trends in progress made
D.1.5.c	Prohibition of forced labour: Wage practices (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Pays workers in full and on time: Although the Company does not allow bonded labour, no specific mention found in relation to paying the workers in full and on time. [Human Rights Policy, 2021: assets.adm.com] • Not Met: Payslips show any legitimate deductions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How these practices are monitored for agencies, labour brokers or recruiters
D.1.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Suppliers to pay workers in full and on time in codes or contracts • Not Met: How working with supply chain to pay workers regularly and on time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress
D.1.5.e	Prohibition of forced labour: Restrictions on workers (in own production or manufacturing operations)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Does not retain documents or restrict movement: The Human rights policy reads: 'We prohibit 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'. [Human Rights Policy, 2021: assets.adm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How these practices are monitored for agencies, labour brokers or recruiters
D.1.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Free movement rules in codes or contracts: The Human rights policy reads: 'We prohibit 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.' The Company indicates that it expects that its 'direct and indirect suppliers, business partners, agents and consultants uphold these principles [...] This policy will be communicated to suppliers through direct communication, posting in areas that are visible to suppliers, and inclusion in supplier contracts and/or incorporation via ADM's Supplier Expectations.' [Human Rights Policy, 2021: assets.adm.com] & [Supplier expectation, 09/05/2018: assets.adm.com] • Not Met: How working with suppliers on free movement <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.6.a	Freedom of association and collective bargaining (in own production or manufacturing operation)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commits not to interfere with union rights / Steps to avoid intimidation or retaliation: The Company states in its Human Rights Policy: 'We respect employees' right to join, form or not to join a labor union without fear of reprisal, intimidation, or harassment. Where employees are represented by a legally recognized union, we support establishing a constructive dialogue with their freely chosen representatives. We are committed to bargaining in good faith with such representatives of our employees, and expect our suppliers to do the same'. However, no further information describing how the Company avoid intimidation or retaliation against employees or its representatives was found. [Human Rights Policy, 2021: assets.adm.com] • Not Met: Discloses % total direct operations covered by collective CB agreements: In the GRI index of the sustainability report the company provides the figure of 14%. However, no further details found and therefore it is not clear whether this actually are the percentage of the total workforce covered by collective bargaining agreements. No further evidence found in latest report. [Corporate Sustainability Report 2019, 2020: assets.adm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: FoA & CB rules in codes or contracts: The Company states in its Human Rights Policy: 'We respect employees' right to join, form or not to join a labor union without fear of reprisal, intimidation, or harassment. Where employees are represented by a legally recognized union, we support establishing a constructive dialogue with their freely chosen representatives. We are committed to bargaining in good faith with such representatives of our employees, and expect our suppliers to do the same.' In addition, its Supplier expectation document indicates: 'We expect suppliers to respect freedom of association and collective bargaining,...'. However, no provision regarding intimidation, harassment and violence against labor unionist or its representatives was found. The Company has provided additional comment to CHRB regarding this indicator. However, evidence was not material. [Supplier expectation, 09/05/2018: assets.adm.com] & [Human Rights Policy, 2021: assets.adm.com] • Not Met: How working with suppliers on FoA and CB <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress
D.1.7.a	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production or manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes process to identify H&S risks and impacts: The Company indicates in its Corporate Sustainability Report 2021: 'We have a safety and health management system made up of a robust list of policies, standards and other supporting documentation, including life-critical standards governing our high-risk work. We use incident investigation processes and tools to continuously improve our management system and operational practices. Internal safety audits are an essential part of our governance and serve as an important tool to identify opportunities for improvement, reduce risk, support our compliance commitments, and share lessons learned'. [Corporate Sustainability Report 2021, 2022: adm.com] • Met: Injury Rate or Lost days or Near miss disclosures for last reporting period: The Company discloses information about its TRIR in its Corporate Sustainability Report 2020 (0.77) [Corporate Sustainability Report 2020, 2021: assets.adm.com] • Met: Fatalities for lasting reporting period: In addition, it reports: 'After almost two years without a fatality, ADM lost five colleagues in 2020.' [Corporate Sustainability Report 2020, 2021: assets.adm.com] • Not Met: Occupational disease rate for last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Met: Set targets for H&S performance: The Company indicates in its Corporate Sustainability Report 2020_ 'we've set a new, ambitious goal: by 2025, we aim to reduce our Total Recordable Incident Rate and Lost Workday Incident Rate by 50% over a 2020 baseline.' [Corporate Sustainability Report 2020, 2021: assets.adm.com] • Not Met: Met targets or explains why not or how improve management systems

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Sets out clear Health and Safety requirements: Although the Company requires from suppliers to respect and promote the health and safety of all parties in its Human Rights Policy that applies also to suppliers, no further guidelines found. [Supplier expectation, 09/05/2018: assets.adm.com] & [Human Rights Policy, 2021: assets.adm.com] • Not Met: Injury Rate or Lost days or Near miss disclosures for last reporting period • Not Met: Fatalities rate for lasting reporting period • Not Met: Occupation disease rate for last reporting period: The Company indicates that 'Occupational health and safety is a top priority at ADM. We are committed to providing a safe working environment to all our employees and contractors. For the last several years, we have been on a journey to a goal of zero injuries – building a safety culture so everyone will go home safely to their families and the things that are most important to them.' However, no further information reporting occupational disease rate for supplier workers was found. [Corporate Sustainability Report 2021, 2022: adm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How working with suppliers on H&S • Not Met: Assessment of the number affected by H&S issues in the SP • Not Met: Provides analysis of trends demonstrating progress
D.1.8.a	Land rights: Land acquisition (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Approach to identification of land tenure rights holders: The Company states in its Human Rights Policy: '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'. However, no evidence on how it identifies legitimate tenure rights or works with communities was found. [Human Rights Policy, 2021: assets.adm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How valuation and compensation works • Not Met: Follows IFC PS 5 in any state land deals
D.1.8.b	Land rights: Land acquisition (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Rules on land & owners in codes or contracts: The Human rights policy, which also applies to suppliers, indicates: 'We expect all suppliers to uphold the principles of FPIC in their operations and business dealings'. In addition, the Company indicates in its Policy to Protect Forests, Biodiversity and Communities: 'We require our suppliers to operate their businesses ethically - including land acquisition and land use - within all applicable laws and regulations, and to uphold our commitments'. However, no details found in relation to guidelines to have a process to identify legitimate tenure rights holders in the Supplier Code and to negotiate to provide compensation or requested alternatives. [Human Rights Policy, 2021: assets.adm.com] & [Supplier expectation, 09/05/2018: assets.adm.com] • Not Met: How working with suppliers on land issues <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Includes resettlement requirements that the supplier provides financial compensation • Not Met: Assessment of the number affected by land rights issues in its SP • Not Met: Provides analysis of trends demonstrating progress
D.1.9.a	Water and sanitation (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Action to prevent water and sanitation risks: The Company states in its Human Rights Policy: 'We respect the right to access safe and clean drinking water and sanitation in our operations and supply chain.' In addition, in its Corporate Sustainability Report 2020, it indicates: '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'. No details found, however, on action plans already underway to deal with risks and impacts. [Human Rights Policy, 2021: assets.adm.com] & [Corporate Sustainability Report 2020, 2021: assets.adm.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Water targets considering local factors: The Company indicates in its Corporate Sustainability Report 2020: '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.' However, this is a work in progress. [Corporate Sustainability Report 2020, 2021: assets.adm.com] • Not Met: Reports progress and shows trends in progress made
D.1.9.b	Water and sanitation (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Rules on water stewardship in codes or contracts: The human rights policy, which applies to suppliers, indicates: 'We respect the right to access safe and clean drinking water and sanitation in our operations and supply chain.' However, no provision with specific rules on water stewardship was found. [Human Rights Policy, 2021: assets.adm.com] & [Supplier expectation, 09/05/2018: assets.adm.com] • Not Met: How working with suppliers on water stewardship issues: The Company reports that 'we work with downstream customers to implement customized and targeted sustainable agriculture projects based on education, outreach, and continuous improvement. These programs focus on specific outcomes such as irrigation efficiency, carbon reduction and sequestration, or water quality impacts. We have identified four key practices that can provide positive outcomes in several or all of these areas – complex crop rotations, nutrient management plans, reduced tillage, and cover crops. Working across 11 active projects in the United States, we engaged growers representing over 800,000 acres of corn, soy and wheat in 2020. We continue to focus on implementing projects that educate and incentivize positive change. In addition to direct financial incentives, we partner with agronomy specialists to provide technical assistance to ensure growers have support and success when implementing new practices'. It is not clear however, how these actions specifically relate to water and safe access to water for communities. [Corporate Sustainability Report 2020, 2021: assets.adm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by lack of access to water and sanitation • Not Met: Provides analysis of trends demonstrating progress
D.1.10.a	Women's rights (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Process to stop harassment and violence against women • Not Met: Working conditions take account of gender • Not Met: Measures and steps to address gender pay gap at all levels of employment: The Company indicates in its Corporate Sustainability Report 2020: 'We have made a commitment through Paradigm for Parity to achieve gender parity in our senior leadership team by 2030. Since making this commitment in 2018, we have improved our gender diversity from 21% to 27%.' However, no further information describing the measures taken to address gender pay gap was found. [Corporate Sustainability Report 2020, 2021: assets.adm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Provides analysis of trends demonstrating closing gender pay gap
D.1.10.b	Women's rights (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Women's rights in codes or contracts

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: How working with suppliers on women's rights: The Company discloses information about its Labor Assessment Builder Program in Colombia: 'In 2020, ADM supported a multi-stakeholder alliance coordinated by Solidaridad aimed to build an inclusive palm oil value chain between Colombian smallholders, processors and international markets. [...] Based on the outcomes of the phase one assessment, an improvement plan will be developed by the participating companies, including: [...] Implementation of non discrimination and equal opportunity policies to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. Establishment of a gender committee to raise awareness, identify and address issues of concern as well as opportunities and improvements for women.' However, this plan will be developed, so it is a work in progress. [Corporate Sustainability Report 2020, 2021: assets.adm.com] Score 2 • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • Not Met: Provides analysis of trends demonstrating progress

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Area: Land Rights • Headline: ADM and Bunge linked in a report to conflict-tainted palm oil in Indonesia • Story: In December 2020, in a new report "Trading Risks: How ADM and Bunge are failing Land and Environmental Defenders in Indonesia", Global Witness uncovered how ADM and Bunge are failing to ensure the hundreds of Indonesian palm oil mills they source from are free from human rights abuses and land grabs. Global Witness calls on both companies to adopt policies to stop land grabbing in their supply chains and to ensure that land and environmental defenders – those communities and individuals that take a stand against the damaging exploitation of natural resources and the environment – are protected. Global Witness found that 129 of 330 sampled mills have been accused of violating local community land rights, criminalising or attacking defenders, and/or causing serious environmental degradation. "Under international standards, global agribusiness companies have clear responsibility to monitor and address the human rights and land rights abuses in their supply chains," said a Senior Campaigner at Global Witness. "Our investigation shows ADM and Bunge are failing to meet these international standards – and the frequency of reports of serious abuses in their supply chains is alarming." "Nearly 40% of sampled palm oil mills had credible allegations against them, yet barely any of these allegations are being investigated or addressed by the two companies," said Ali Hines, Senior Campaigner at Global Witness. "Yet ADM and Bunge do not have sufficient checks or mitigation processes in place to ensure the mills they source from are free from abuses, which is why nearly 40% of the sample of Indonesian mills we analysed have reportedly been associated with environmental and land rights abuses – such as land grabbing – or human rights violations of local communities." +F7 [Global Witness, 10/12/2020, "Indonesia palm oil traders are failing land and environmental defenders": globalwitness.org]
E(1).1	The company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Public response: In response to the allegation, ADM replied to Global Witness that it would be monitoring 9 mills identified in their report, and is continuing investigations on a further 36 mills. It closed investigations or otherwise declined to investigate the remaining mills. In addition, ADM responded to Global Witness that it would investigate all cases raised at the report. [Global Witness, 10/12/2020: globalwitness.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: The company did give an overview of the steps it had taken after being informed of the allegation. However, regarding the human rights violations the response remains general and does not address the various aspects of the alleged conduct.
E(1).2	The company has investigated and taken	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders: The company has implemented 'Transformation Projects' located in Indonesia. However, this contains no

Indicator Code	Indicator name	Score (out of 2)	Explanation
	appropriate action		<p>evidence suggesting that the company engaged with the affected communities identified in the Global Witness report.</p> <p>The company presents a Grievance and Resolution Log listing cases of known grievance and the steps taken afterwards by the company or the linked businesses. However, way the information is presented does not enable CHRB to clearly identify whether any of the cases match the allegations by Global Witness. Therefore, CHRB is unable to identify whether the company or the linked businesses engaged with the affected stakeholders identified in the Global Witness report. [ADM's Commitment to Protecting Forests, Biodiversity and Communities H2 2021 Palm Progress Report, 2021: assets.adm.com] & [Grievance-and-Resolution, 2022: assets.adm.com]</p> <ul style="list-style-type: none"> • Not Met: Identified cause: The company presents a Grievance and Resolution Log listing cases of known grievance and the steps taken afterwards by the company or the linked businesses. However, way the information is presented does not enable CHRB to clearly identify whether any of the cases match the allegations by Global Witness. Therefore, the company does not clearly present investigative results on the underlying causes of the events concerned. [Grievance-and-Resolution, 2022: assets.adm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements • Not Met: Stakeholder input to steps taken
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provided remedy: The company presents a Grievance and Resolution Log listing cases of known grievance and the steps taken afterwards by the company or the linked businesses. However, way the information is presented does not enable CHRB to clearly identify whether any of the cases match the allegations by Global Witness. Therefore, CHRB is unable to identify whether any of the affected stakeholders identified by Global Witness received remedy. [Grievance-and-Resolution, 2022: assets.adm.com] • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders: The company presents a Grievance and Resolution Log listing cases of known grievance and the steps taken afterwards by the company or the linked businesses. However, way the information is presented does not enable CHRB to clearly identify whether any of the cases match the allegations by Global Witness. Therefore, CHRB is unable to identify whether any of the affected stakeholders identified by Global Witness received remedy. [Grievance-and-Resolution, 2022: assets.adm.com] • Not Met: Remedy delivered: The company presents a Grievance and Resolution Log listing cases of known grievance and the steps taken afterwards by the company or the linked businesses. However, way the information is presented does not enable CHRB to clearly identify whether any of the cases match the allegations by Global Witness. Therefore, CHRB is unable to identify whether any of the affected stakeholders identified by Global Witness received remedy. [Grievance-and-Resolution, 2022: assets.adm.com] • Not Met: Independent remedy process used

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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