



Non-U.S. New Hire Required Training Handbook for Non-Networked Colleagues



This handbook is designed to help new non-networked colleagues (colleagues without a company email address and/or no access to a computer) fulfill their training requirements independently when online or classroom options are not feasible.

New colleagues should read the information provided in this handbook carefully, sign the attestation at the end and return the signed sheet to the facility's hiring manager, HR representative or training coordinator. The hiring manager, HR rep or Training Coordinator receiving the signed document should upload completion information into CourseMill. The original signed document should be retained at the facility for audit purposes.

These actions should be completed within the first five working days of the colleague's start date.

Achieving the Right Results, the Right Way
ADM New Colleague Training Handbook

Dear Colleague,

Welcome to ADM!

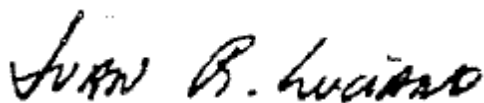
We're excited that you have chosen to join our company during an exciting time in our 115-year history. ADM is already among the most admired companies in the agribusiness and food-ingredient industries, and your contributions will enable us to continue delivering outstanding value to our customers and shareholders the ADM Way—that is, with integrity, responsibility and respect.

This handbook aims to ensure you are fully prepared to conduct business the ADM Way from Day 1. We want to ensure you don't put yourself or the company at risk of violating policies, competition laws or data security practices, which is why this guide will provide you with an overview of tools and resources you can turn to when you have questions.

The pages that follow cover our code of conduct, security awareness, and diversity and inclusion. Once you've read the entire book, you will have a better understanding of how to make decisions that are consistent with the core values of our company and our code of conduct. You'll also understand your obligation to report misconduct, and you'll know whom to consult if you have compliance concerns.

Once again, welcome to ADM. We look forward to working with you!

Sincerely,

A handwritten signature in black ink that reads "Juan R. Luciano". The signature is written in a cursive, slightly slanted style.

Juan R. Luciano
Chairman and CEO

Our Code of Conduct

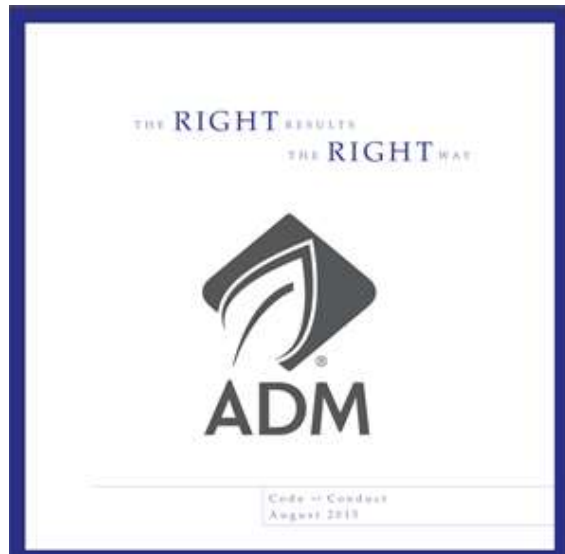
Following is an overview of ADM's code of business conduct and ethics, which will help you better understand ADM's core values and our way of doing business. It also will help you understand the policies that govern our company, the laws that regulate our business, and—when laws and policies don't provide the answers—the ethical principles that guide us.

Our goal is to enable you to make informed decisions, understand that you are responsible for reporting any misconduct you see, and know where and whom to go to for help.

Our Code of Conduct shows each of us how to make sound decisions and act appropriately when conducting business for ADM. The Code applies to every employee, officer and director of the company, and we expect our suppliers, business partners, agents and consultants to uphold it as well.

As employees, all of us are expected to know, respect and uphold the Code standards.

You should have received our Code of Conduct Booklet during the hiring process from your local HR representative or supervisor/manager.



This booklet is every employees "how to" guide when addressing compliance-related concerns.

Values and Ethics

The Code helps us succeed as a global company. With operations on six continents, we are subject to different rules and regulations in more than 60 countries. By having a universal code to guide us, we can maintain the highest degree of integrity regardless of variations in local laws or customs.

Let's begin by going over a few key concepts.

- **Compliance** simply means following the law and company policies.
- **Ethics** takes you beyond the law. In simple terms, ethics is making decisions based on principles. At work, that means using our company's core values to guide your choices.
- **Core Values** are the things we consider important at our company—things like integrity, respect, excellence, resourcefulness, teamwork, and responsibility.

To consider

If you ever are confronted with an ethical dilemma, first stop and determine the facts. Then, ask yourself these four questions about the action you're considering:

- Will it violate any laws or company policies?
- Could it appear improper?
- Might it hurt others?
- Will others feel I owe them something in return—or they owe me something—if I take this action?



If the answers to these questions are "yes" or "I don't know," that's a warning sign to stop, reconsider your options, and—if need be—get further guidance.

There may be times when you feel pressured to do something that feels wrong. If this happens, don't proceed until you've sought guidance from your supervisor, or from the ADM Way Helpline.

Never compromise your commitment to doing the right thing, and never compromise our core values. Our integrity is part of our brand—our "good name," if you will—and once it's tarnished, it could take a very long time to repair.

Discrimination

We believe that people with varied backgrounds and perspectives add vitality and creativity to the company, and we encourage diversity in the workplace.



We therefore provide equal employment opportunities regardless of race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, veteran status, genetic information, or any other legally protected group status. So if you're in a position to make employment decisions for the company, be sure they're justifiable and based on business-related, nondiscriminatory factors.

It's important to be treated fairly at work. It's equally important to do the right thing and treat others fairly.

Discrimination is negative, unequal treatment based on one or more personal characteristics. It can place artificial barriers in the way of success. It is prohibited at ADM.

We also are committed to honoring employee rights:

- We comply with all applicable wage and hour laws
- We treat employees with dignity and respect
- We follow local employment laws
- We never knowingly uses suppliers who employ or exploit legally underage workers or forced labor and does not condone such practices.
- We expect our business partners to treat their employees with dignity and respect, and to follow local employment laws.

Protection from Discrimination and Harassment

Just as we treat others with respect, it's our policy never to discriminate against employees or potential employees based on a **legally protected category**.

Respect for others ensures a workplace free of harassment. Harassing behavior is destructive to our culture and against our core values, even when it isn't illegal.

Sometimes, harassing behavior may be against the law. Sexual harassment—offering a job or promotion in exchange for sexual favors or demands for sex as a condition of continued employment or advancement—will never be tolerated.

Instances of discrimination and harassment should be reported to your manager or Human Resources representative.

You can also file a report using one of the following resources:

- The ADM Way Helpline
- Phone: Visit [The ADM Way Helpline](#) on Inside to find toll-free numbers by country.
- Online: Visit www.theadmwayhelpline.com to submit a confidential report.
- ADM's compliance office
- Phone: 1-217-424-4929 or 800-637-5843, ext. 4929
- E-mail: compliance@adm.com
- Postal mail: P.O. Box 1470, Decatur, IL 62526



Hostile Work Environment

Some kinds of behaviors are never acceptable in the workplace because they constitute harassment and are against the law. It's important that we share the same definition of what harassment means.

Harassment is repeated, unwelcome conduct directed toward others on the basis of their race, color, religion or sex (including pregnancy) national origin, sexual orientation, age, disability or genetic information.

Illegal harassment, including sexual harassment, can also occur when unwelcome conduct—whether visual, verbal, or physical—is severe or pervasive enough to change an employee's working conditions.

As a general rule, **if it's mean or demeaning, don't say it, and don't do it.** And, speak out if you ever have a concern about discrimination or harassment.

To the extent possible, we'll keep everything you tell us confidential, and we'll protect you from retaliation for making a good-faith report or participating in an investigation.

Health, Safety and the Environment

Whether working with a forklift, a keyboard, electricity or chemicals, we all must be attentive to safety on the job, and ADM policies offer you guidance for preventing accidents.



For our benefit—and that of the communities we operate in—we need to comply with all health and safety regulations that apply to our jobs. We must never conduct business on ADM's behalf, or ask others to do so, when it cannot be done safely.

We also recognize our obligation to safeguard the environment by meeting environmental obligations for protecting the environment and enhancing environmental sustainability. Our communities depend on us to recognize the impact of our activities, and minimize any environmental

hazards. So we must all take steps to ensure that we are good environmental stewards.

If it's your job at ADM to oversee our use of water, monitor plant emissions, or make sure that we follow environmental permits and approvals, then you already know how important it is for ADM to do business in an environmentally responsible way.

Violence in the Workplace

Workplace safety is everyone's job. ADM won't tolerate fighting, physical abuse, threats, possession of firearms or other weapons in company facilities, or the use of alcohol or illegal substances in the workplace, or other dangerous behaviors.

If you spot a potential health or safety violation, or if you suspect that someone in our workplace is a danger to him- or herself or others, contact your manager or other company personnel at once. When it comes to workplace health and safety, there's no margin for error.

Careful Communication

Communicating properly and appropriately with each other and with our clients, vendors, and suppliers is critical. It's especially important with e-mail. Once sent, e-mail can live virtually forever both in hard drives and on company networks. So bear in mind that when you use company e-mail or instant messaging, your online presence represents the company. Be especially careful when visiting websites, or when sending or forwarding jokes, images, or other material that others may not appreciate.

ADM reserves the right to monitor your e-mail and other electronic communications, subject to the laws of the jurisdictions where we work. And while we welcome and encourage your participation in civic and political affairs, make sure you don't inadvertently link ADM to any outside organization without our knowledge and approval. Also, never use ADM assets or facilities for nonbusiness purposes—such as working for a political campaign or charitable organization—without prior approval.

Gifts and Entertainment

Throughout the business world, giving modest gifts is a common practice—either to express appreciation for a job well done or simply to advertise a company's brand.

But problems arise when gifts or hospitality could be perceived as influencing business decisions.



We permit gifts of a nominal value, as well as business-related entertainment that isn't excessive, such as meals. Refer to our Anti-Corruption Policy for guidance related to gifts and entertainment for government officials. Never give a gift that could be seen as an attempt to improperly influence another person or company. Be sure to consult the Code of Conduct for additional guidance on gifts and entertainment. And remember: Some companies and government agencies have a zero-tolerance policy toward accepting gifts, so be aware of their policies and laws before you give.

If you're offered an unsolicited, inexpensive gift that's clearly not given to influence your judgment, you most likely can accept it, but you should check with your supervisor first. If the gift is expensive or inappropriate, or could appear to influence your work, you need to decline it. Even the appearance of impropriety can damage a business's reputation and bottom line. So avoid doing anything that might raise questions about ADM's intentions or integrity.

Confidential Information

All ADM colleagues are responsible for safeguarding their own and the company's confidential information. This includes any information related to our dealings, plans, or know-how. Examples include information about business activities and financial performance; technical data and other proprietary information; and documents, files, or e-mail messages.

Our **intellectual property (IP)**—the unique ideas of our business—sets us apart from our competitors. It includes copyrighted materials, patented inventions, trademarked products and services, and confidential trade secrets. We're proud of our innovations, but we also need to keep our "secrets" secret. You're responsible for protecting ADM's confidential information as well as that of our customers, suppliers, vendors and business partners.

ADM also protects confidential information about you. Only authorized employees with a legitimate "need to know" have access to any personal information about you. Confidential Information includes:

- Personnel data
- Trade secrets
- Customer information
- Business activities
- Financial performance and records
- Technical data or proprietary information

You must avoid discussing ADM's confidential information in public places such as elevators, restaurants, or airplanes. Our most valuable trade secrets could be stolen because of an ill-timed comment.

It's also important to respect the rights of other companies and individuals. If you copy and distribute a protected work—like software, a book passage, or other copyrighted material—without first getting the proper authorization to do so, you and the company could be subject to civil and criminal penalties.

Misstating Numbers = Fraud



In recent years, many companies have been caught falsifying their books and records. Financial statements are the cornerstone of ADM's integrity, so every entry we make has to be accurate. From descriptions of transactions to sales forecasts, the watchword is **transparency**.

Misstating numbers or incorrectly describing transactions is fraud and can lead to serious criminal penalties. Make sure you know the reporting rules that apply to your job, and cooperate with all auditors and accountants who help keep tabs on our financial integrity.

Proper Record Retention

Has your desk ever been buried under a mountain of paperwork? It's tempting to just sweep the whole pile into the trash, isn't it? But keeping proper records means keeping the right documents around for the right amount of time.

Our business records need to be maintained, stored, and disposed of according to our policies.

We keep some documents for legal reasons and others help us operate more efficiently. Take time to familiarize yourself with ADM's records management policy.

Our Records Management Policy (RMP) establishes the framework of rules and guidelines for handling all records throughout their lifecycle, including creation, access, use, storage, retention, preservation for retention holds and disposition. It also addresses the satisfaction of legal obligations, regulatory requirements and operational needs for records and their retention by establishing consistent and accountable recordkeeping practices throughout the organization.

Bribery and Corruption

When doing business internationally, another area of concern is bribery, since giving or receiving bribes can violate treaties and laws. So even if it's commonly understood that a company has to "pay to play" in a certain country, we don't—not directly, and not through agents or intermediaries.

Remember, you don't have to offer cash to be guilty of bribery. A bribe can be anything of value—even the promise of a job or other business consideration. The golden rule on bribery is simple: **We will never offer or accept any form of bribery, under any circumstances.** The consequences of breaking this rule could be very serious for you and ADM.

When in Doubt, Speak Out!

Suppose you've witnessed or suspect a violation of one of these policies. Now what?

- If you see something that you suspect is illegal, unethical, or unsafe, you're obligated to speak up immediately—no matter who might be involved.

The ADM Way Helpline

- **Phone:** Visit [The ADM Way Helpline](#) on Inside to find toll-free numbers by country.
- **Online:** Visit www.theadmwayhelpline.com to submit a confidential report.
- **ADM's compliance office Phone:** 1-217-424-4929 or 800-637-5843, ext. 4929
- **E-mail:** compliance@adm.com
- **Postal mail:** P.O. Box 1470, Decatur, IL 62526

- When in doubt, contact your manager, supervisor, human resources, legal department, compliance office, or The ADM Way Helpline.

- If the issue is sensitive, you can report it anonymously where allowed by local law. If you do give your name, your report will be kept confidential unless the company is required to disclose it in an investigation or a legal proceeding. **We do not permit retaliation for asking a question or making a report.**

Know the Code!

By now, you should better understand how to let your ethical instincts shape your decisions so that they're consistent with the core values of our company and our Code.

You've learned about the laws and regulations we must follow, and you know how to get help when you need it. You also understand your obligation to report misconduct, and whom to talk to if you have compliance concerns.

Remember, this section isn't designed to address every possible situation that might come up in your workplace, and it can't substitute for legal advice. Just remember that we have plenty of resources in place to help you when you need it.

If you have specific questions about our policies or the laws that govern our work, talk to your supervisor or contact our human resources, compliance office or legal department. All you need to do is ask.

Diversity and Inclusion

At ADM, we feel a deep and genuine regard for the safety and well-being of our colleagues and we treat them with respect. A respectful workplace is more pleasant and more productive for everyone.



Diversity

Diversity – variety in the combination of visible and invisible differences that shape the way each person views and interacts with the world. It means understanding and appreciating that each individual is unique and recognizing how our individual differences contribute to the organization's success.

All of the characteristics that make us who we are.

They can include:

- Ethnicity
- Race
- Sexual orientation
- Education
- Gender
- Religion
- Clothing
- Income
- Age
- Disability
- Hairstyle and color
- Marital Status
- Color
- National Origin
- Tattoos and piercings
- Culture

In business as in sports, the strongest teams usually owe much of their success to the way they select and combine their people. Each person brings something unique to the group and is encouraged to use his or her particular talents in ways that support and bring out the best in each other.

Diversity is all about the value in differences; inclusion is the combination of all the visible and invisible differences that shape the way that members of a group view and interact with the world—essentially, the individual differences that make us who we are. It means understanding and appreciating that each individual is unique and recognizing how our individual differences contribute to the organization's success.

Notably, diversity has been closely associated with increased workforce productivity, creativity, and business opportunity. For example, an American Sociological Association study found that for every 1 percent rise in the rate of gender diversity and ethnic diversity, there was a 3 percent and 9 percent rise, respectively, in sales revenue. This proves that different people bring different ideas and perspectives to real-world problems, and that truly successful, innovative, and long-lasting companies build diverse teams from the outset. Diversity is a state of mind, not a corporate program.

Inclusion is feeling valued for your unique characteristics and included in the workplace. Inclusive behaviors are intentional actions that help us fully utilize all talent and provide the best service to our clients.

Companies can suffer in many ways if employees don't feel included. They may experience a decline in morale, lost productivity, higher turnover, increased absenteeism, increased recruitment costs, and workplace harassment or discrimination claims.

To ensure you practice inclusion in your daily work, try these suggestions:

- Make sure people get credit for their ideas.



- Speak out against biases in who is assigned certain tasks, given certain stretch assignments, offered career advice, or nominated for leadership opportunities.
- Learn and use the correct pronunciation of colleagues' names.
- Take the time to learn about your coworkers to help better understand their view
- Be careful not to ignore, dismiss, interrupt or talk over others.
- Be aware of your communication and work styles and think of ways to respect other's preferences
- Avoid the distraction of multitasking.
- Avoid critiquing with nonverbal behavior, like rolling of eyes or checking a watch or mobile phone.
- Be aware of your tone of voice
- Print a list of your entire team before selecting someone for a special assignment, as a way to safeguard against choosing someone who may be top-of mind simply because s/he is similar to you or works nearby.

Security Awareness

Data and location security are essential to the safety and well-being of employees and the company. Cybercrime and scams pose a significant threat to company data, systems and locations.

Access to secure areas should be restricted to authorized individuals only. Always keep company IDs, badges, keys and fobs secure. Never lend or borrow others security credentials. Alert security if you spot items with no visible owner, such as ID badges, USB drives, packages, briefcases and so on.

Also, always scan your badge or ID when entering or exiting a company facility, even if someone is holding the door or elevator for you, and remind others to do the same. Make sure the door closes and locks when you pass through. Notify security if a door latch is compromised or there is something that doesn't look right.

And when entering or leaving company facilities, be aware of your surroundings and others in your vicinity. Never give strangers access to secure areas.

Some scammers may use a false identity trying to establish a level of authority or credibility to impersonate an employee, vendor, contractor or customer. They may call employees to trick them into sharing private company or employee information or attempt to access a company building.

Always verify credentials of unknown contractors, service techs or messengers prior to allowing them in the building. In some locations, you would want to contact location security to make sure they are authorized before entering a company facility.

And, when receiving a call from an unknown number ask for a name, disconnect and call back. Often the number does not belong to the person who called or does not match the company the caller represented.

Wrapping Up

Thank you for giving the content of this handbook your full attention. Please be sure to keep it handy for future reference. As a new ADM colleague, you are now part of a company that has adapted, innovated and thrived for more than a century ... all thanks to the great work of employees like you. We're glad you're here, and we look forward to working with you to achieve results the right way...the responsible way...the ethical way...The ADM Way.



ADM New Hire Required Training Handbook Attestation

I attest that I have read the below listed topics in the Non-Networked New Hire Required Training Handbook and agree to support and adhere to all of the policies and practices contained therein.

- Code of Conduct Orientation
- Code of Conduct: Putting Principles into Practice
- Diversity and Inclusion
- Security Awareness

Please separate this sheet from the handbook, sign and return to your immediate supervisor, training coordinator or Human Resource representative within five days of receiving this handbook.

Signature

Printed Name

Note to immediate supervisor, training coordinator or HR representative: Please file this attestation for auditing purposes. This constitutes completion of the courses required in the new hire training. Please record completion in CourseMill.