Dear Stakeholders:

As a global agricultural processor and food ingredient provider, we at ADM serve vital needs for food and energy throughout the world. Our commitment, as we do so, is to deliver the right results, the right way.

The right way, to us, includes working to help ensure the crops we source are responsibly grown. It means striving to lessen the environmental impact of our transportation, processing and distribution operations. It means we contribute to the quality of life in the communities where we live and work. And it means we do all we can to keep our colleagues safe.

In the past year, we made significant progress toward our environmental goals and adopted strong supply-chain policies to help ensure that human rights and ecologically sensitive forest lands are respected and protected. We continued to make grants to support education, hunger relief, sustainable agriculture and other important causes. We had our safest year ever, and extended our momentum into 2015. And we continued to innovate to improve the efficiency and environmental footprint of our operations.

We welcome your comments and suggestions at responsibility@adm.com.

Juan R. Luciano
CEO and President
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Establishing Clear Guidelines and Expectations

In this section, we highlight several key social and environmental corporate policies. These policies set forth our expectations of our colleagues, business partners and contractors, and our organization as a whole. They establish clear standards that govern our approach to raw-material sourcing, environmental stewardship and employee conduct, among other areas, and they state our positions on issues of widespread public interest.

**POLICIES AND COMMITMENTS**

**HUMAN RIGHTS**

*Helping to Protect Workers throughout the Global Supply Chain*

In 2014, ADM published a formal Commitment to Respect Human Rights, aimed at ensuring that our colleagues, our suppliers and their contractors respect workers’ rights and comply with all applicable local, national and international laws governing working conditions.

The commitment contains strict prohibitions against the use of child labor, forced labor and bonded labor, and includes several other guidelines to protect workers and communities from exploitation. We are currently working in partnership with expert third parties to ensure our raw material suppliers’ adherence to its terms and conditions.

This commitment to no deforestation is advanced through policies focused on palm and soy supply chains.

Read the entire commitment here.

**NO DEFORESTATION**

*As one of the world’s leading agricultural processors and food-ingredient providers, ADM commits to build traceable and transparent agricultural supply chains that protect forests worldwide.*

Though we are not a grower of crops, we work independently and with industry partners and other stakeholders to improve the quality of crops in the global supply chain, the lives of farmers and communities that grow them, and the environment we share.

This commitment to no deforestation is advanced through policies focused on palm and soy supply chains.

Read the entire commitment here.
ENVIRONMENTAL

A Commitment to Good Stewardship

ADM’s Environmental Policy sets forth our commitment to:

• Establish programs and practices intended to ensure operations are conducted in an environmentally sound manner and that applicable laws and regulations are followed;
• Commit the resources needed to support and implement these programs and practices;
• Perform periodic evaluations to ensure that the ADM environmental programs and practices established to support its requirements are working effectively;
• Communicate and reinforce accountability for environmental stewardship throughout the company;
• Provide training as needed to assist colleagues in understanding their environmental responsibilities and carrying out their job duties in ways consistent with sound environmental practices;
• Participate constructively in the process of creating reasonable environmental laws, regulations, policies and guidelines to safeguard the workplace, the community and the environment; and
• Develop, design and operate facilities and conduct activities taking into consideration the efficient use of energy and materials, environmental impact, and safe and responsible management of waste.

Read the entire commitment here.

CODE OF CONDUCT

Working to Achieve the Right Results, the Right Way

ADM’s Code of Conduct establishes high standards of integrity for all ADM colleagues and business partners, and sets forth specific policies to help ensure that our company conducts business fairly and ethically at all times, everywhere we operate.

The Code also offers guidance on the appropriate handling of situations in which personal and business interests have the potential to conflict.

GMOs

Statement On Genetic Modification and Other Technologies

ADM supports a wide variety of technologies that can help farmers do more with less. This issue is a critical goal for agriculture; new technologies and products are key in the effort to feed a growing global population while limiting increased use of farmland and water. We also recognize and respect our customers’ desire for options. We work to meet our customers’ need for identity-preserved crops and products. Because of our vertical integration, we have developed—for certain product lines—systems that track and preserve crop identity from seed to factory to finished product to make such options available for our customers.

Read the entire commitment here.
Working to Advance Sustainable Agriculture Worldwide

ADM connects the harvest to the home, making products for food, animal feed, chemical and energy uses. We generally don’t grow crops; we typically buy them from growers and third parties that market crops from many different growers. But because we occupy a prominent position in the agricultural value chain that extends from the farm gate to the consumer’s plate, we work with our industry peers, trade associations, growers, governments, NGOs and operating communities to improve the quality and availability of crops in the global supply chain, and the lives of farmers and communities that grow these crops.

SUPPLY CHAIN INTEGRITY

NORTH AMERICAN OILSEEDS

ADM is among the world’s largest soybean originators and processors. Following are recent highlights of our work to foster a more sustainable soy supply chain.

160,000 Documented acres of sustainably cultivated soybeans sourced in 2014 through our Field to Market collaboration with Unilever.

200,000 Documented acres of sustainably cultivated soybeans sourced since the program began in 2013.

In recent years, several certification bodies—including the Round Table on Responsible Soy and the International Sustainability and Carbon Certification—have emerged to establish standards for the sustainable production and sourcing of soy meal and soy oil. In North America, no such program or system has yet gained widespread acceptance. Therefore, we work in innovative partnership with companies that want to procure sustainably sourced soy.

For instance, ADM has teamed with Unilever, the WWF, the United Soybean Board, the Iowa Soybean Association and the Field To Market sustainable agriculture initiative to ensure that the oil used in Unilever’s Hellmann’s Mayonnaise brand is sustainably sourced. Using Field to Market’s Fieldprint Calculator, which enables growers to analyze how their management choices impact natural resources and operational efficiency, our companies have been able to secure soybeans from Midwest farms that satisfy Unilever’s stringent sustainability requirements, and meet its commitment to customers.

In 2014, we sourced 160,000 documented acres of sustainably cultivated soybeans through our Field to Market Program with Unilever.

Click here to link to ADM’s soybean sourcing policy contained in Our Commitment to No Deforestation.
**SOUTH AMERICAN OILSEEDS**

“Doing It Right”

770,000

Approximate number of hectares of farmland listed with Brazil’s Registry of Socio-Environmental Responsibility under the ADM/Aliança da Terra Doing It Right program.

16

Participating farms at program’s inception in 2009.

375

Participating farms today.

Since 2009, ADM and Aliança da Terra, a not-for-profit sustainable farming group founded by farmers, have partnered to help soybean growers in the Brazilian states of Mato Grosso, Mato Grosso do Sul and Bahia improve their yields on existing cropland and minimize the need to expand into ecologically sensitive regions.

Under the “Doing It Right” program (Produzindo Certo), soybean growers agree to allow Aliança da Terra technicians to visit their farms, map the property and analyze the operations. From there, the organization develops a social and environmental action plan for the farmer and recommends a technical training program to help him or her achieve the plan’s goals. After one year, Aliança da Terra returns to the farm to evaluate progress against the plan and determine next steps in consultation with the grower.

**ADM’s Responsible Soy Standard**

90+

Growers participating in the March 2015 launch of the ADM Responsible Soy Standard in Brazil.

The ADM Responsible Soy Standard will enable our customers in Europe and other regions to source protein meal made from sustainably grown soybeans.

Participating growers will be audited based on their adherence to a broad set of social, environmental, legal and agronomic standards, including their labor practices, water and soil usage, solid waste management, observance of land rights, legal compliance, and the responsible use of fertilizers.

In December 2014, ADM began selling soybean meal produced from ISCC-certified sustainable soybeans to European customers.

**Supporting Certification Programs that Meet Customers’ High Standards**

3

Sustainable soybean certification programs in which ADM actively participates in South America.

ADM was also the first company in South America to be certified jointly by 2BSvs (the Biomass, Biofuel and Sustainability voluntary program), a second program developed to help soybean suppliers demonstrate compliance with RED sustainability criteria.

We were the first company in South America to achieve the International Sustainability and Carbon Certification (ISCC) for soybeans by working with growers in both Brazil and Paraguay to successfully complete exacting third-party audits. The certification has allowed ADM to supply the European market with certified-sustainable soy that meets the EU’s Renewable Energy Directive (RED) requirements.

**Signing on to Commitments that are Effecting Change**

8

Years in which ADM has been a signatory to the Brazilian Soy Moratorium.

This participation confirms our commitment to refrain from trading in soy originated in areas within the Amazon Biome that were deforested after July 2006. Prior to the moratorium, according to the University of Wisconsin-Madison, 30 percent of soy expansion occurred through deforestation, and after the moratorium, only about 1 percent has come at the expense of forest.

ADM has also agreed to respect the embargo on crops produced in areas identified by IBAMA, the Brazil Institute of Environment and Renewable Natural Resources, as improperly deforested or burned.

8

Years in which ADM has been a signatory to the National Agreement to Eradicate Slave Labor in Brazil.

The pact is a commitment to refrain from negotiating with companies included in the Lista Suja, or “dirty list,” maintained by the Brazilian Ministry of Labor.

We are a member of the Round Table on Responsible Soy, whose certification system assures that soybeans have been originated from a process that the organization describes as “environmentally correct, socially adequate and economically viable.”

In addition, we are working with the global civil society group Solidaridad to develop a certification-training program for growers in Brazil and Paraguay. Our participation in the organization’s Rural Horizons system is designed to support continual improvement of agricultural production and to strengthen partnerships throughout the supply chain.

We were the first company in South America to achieve the International Sustainability and Carbon Certification (ISCC) for soybeans by working with growers in both Brazil and Paraguay to successfully complete exacting third-party audits. The certification has allowed ADM to supply the European market with certified-sustainable soy that meets the EU’s Renewable Energy Directive (RED) requirements.
EUROPEAN OILSEEDS

Enhancing the Sustainability of the Softseed Supply Chain

ADM Oilseeds production facilities in Europe that have been ISCC PLUS-certified, enabling them to supply the food industry with certified-sustainable edible oils from crops including rapeseed and sunflower seed.

Through the ADM Sustainable Oilseeds Program, participating rapeseed and sunflower growers in Poland, Slovakia, Hungary, the Czech Republic and Ukraine develop environmental management systems and implement sustainable agricultural practices that address soil fertility, water protection, energy efficiency and biodiversity protection. Farms are subject to audits to help ensure compliance. The program is based on ISCC PLUS principles.

As part of the program, ADM has provided financial support to the Polish Society for Bird Protection, which strives to protect rare birds in the grasslands of the Upper Narew Valley in northeast Poland. Through their participation in the Sustainable Oilseeds Program, farmers support this biodiversity development project.

In the United Kingdom, ADM has also entered into a partnership with Linking Environment And Farming, or LEAF, a global organization that promotes sustainable agricultural practices at the farm level to produce sustainable rapeseed oil.

PALM

Toward a Supply Chain that Respects the Environment and Workers’ Rights

Metric tons of RSPO-certified palm products (crude palm oil, palm kernel oil, palm-based derivatives and fractions) ADM handled in 2013.

Percentage of the palm oil ADM can offer to North American customers that will meet the RSPO Mass Balance standard later in 2015. All of ADM’s major palm oil refining facilities worldwide have been RSPO-certified and are able to meet existing market demand for RSPO-certified oil and derivatives. We are also working with Wilmar International Limited to provide fully traceable, sustainable palm oil that meets the RSPO Mass Balance standard.

Oil streams at our European refineries that were using 100 percent RSPO-certified, segregated palm oil as a feedstock at the end of 2014. We plan to convert an additional three streams in 2015.

Smallholder farmers participating in ADM’s sustainable palm oil production and processing program in Pará, Brazil. The program, which conforms to RSPO standards by allowing planting only in areas that were deforested prior to 2006, encompasses approximately 7,500 hectares of oil palm plantation land in areas that have been approved by the government for palm cultivation. Approximately 2,000 of those hectares have been planted by smallholder participants; ADM manages the remaining acreage.

Click here to read ADM’s palm oil sourcing policy contained in Our Commitment to No Deforestation
SUPPLIERS ETHICAL DATA EXCHANGE (SEDEX)

Committed to Helping Customers Build Stronger, More Transparent Supply Chains

55

Number of ADM facilities registered with the Suppliers Ethical Data Exchange, which helps identify safety, environmental compliance, and labor-practice issues in supply chains.

30

Number of SEDEX facility audits hosted and successfully completed as of Dec. 31, 2014. ADM agrees to allow inspections covering each of the areas noted at left.

COCOA

Leaving a Lasting Legacy

ADM entered the cocoa and chocolate businesses in 1997. In 2014, we announced the sale of our chocolate business to Cargill and the sale of our cocoa business to Olam International Limited. These transactions are expected to be complete later in 2015.

During our 18 years in these industries, ADM worked independently and with fellow stakeholders to help improve the quality and sustainability of the global cocoa supply, and the lives and livelihoods of growers and communities along the value chain. Among our most notable contributions:

Cocoa growers who participated in ADM’s Socially and Environmentally Responsible Agricultural Practices program, or SERAP—our flagship cocoa-sustainability platform. We designed SERAP to promote sound, sustainable agronomic, economic and social practices, and to support the pivotal roles women play in cocoa cultivation and rural development. The program also promoted vocational education and worked to fight tropical diseases, such as malaria, through preventative health training, and by creating awareness of the importance of clean drinking water, proper sanitation and good nutrition.

$29,200,000

Premiums ADM provided to grower cooperatives from 2005 through Jan. 31, 2015, to promote sustainable cocoa cultivation and better living standards for cocoa farmers and their communities.

48,600

Côte d’Ivoire farmers participating in 400 ADM Cocoa Technical training program sustainability seminars from 2000 to 2014. The aim has been to teach cocoa growers about labor practices, farm safety, HIV/AIDS prevention, operational transparency, bean quality and environmental stewardship.
Progress Toward 15x20 Targets Continues

A key component of ADM’s business strategy is to drive operational efficiencies, largely through improvements in energy-consumption, process technology, maintenance and other areas.

**15% by 2020**
Targeted reductions in energy, emissions and waste intensity ADM seeks to achieve from 2010 baseline levels.

**15% by 2018**
Targeted reduction in water intensity ADM seeks to achieve from its 2008 baseline level.

From 2008 to 2014, ADM succeeded in surpassing its water and energy-intensity targets and making significant progress toward its emissions goal.

**SYSTEMS**
Environmental Management System, Information System Rollout Moves Ahead

Number of ADM facilities that had implemented the company’s Environmental Management System as of Dec. 31, 2014.

500+

ADM’s EMS—now fully implemented at our U.S. facilities—sets forth a detailed set of procedures and practices to identify and address our company’s environmental impacts, while the EMIS provides technological support, as well as data-collection and analysis capabilities.

The rollout of our EMS to ADM’s locations outside the United States is underway, with completion anticipated by Dec. 31, 2016. In addition, several key components of our EMIS—including our task-tracking and compliance modules—have been fully implemented globally, and a media pilot that will allow tracking of data on emissions, water, waste, and chemical inventories is currently underway.
ENGLISH STEWARDSHIP

ENERGY

Reducing Usage on a Per-Unit-of-Production Basis

Energy intensity reduction achieved since our 2010 baseline.

As of Dec. 31, 2014, ADM’s global footprint comprised more than 300 ingredient-manufacturing facilities, more than 460 crop-origination facilities, 40 innovation centers and a vast global transportation network consisting of approximately 2,600 barges, 28,100 railcars, 1,900 trucks and trailers, and 41 oceangoing vessels.

Since 2011, we have implemented hundreds of energy-saving projects at our plants in areas ranging from pump and fan operations to exhaust heat recovery, process controls optimization and improved data-management. These projects, resulting in reduced electricity purchases—coupled with changes in the fuel we use at several large ADM facilities—have enabled us to achieve an estimated 17.3 percent improvement in energy-intensity—the ratio of energy consumption to production volumes in our plants—since 2010.

As we are currently ahead of our goal of a 15 percent reduction in energy per unit of production by 2020, our focus going forward will be on sustaining and building upon the progress we have already achieved.

ADDING UP THE SAVINGS

1.88 million Megawatt hours (Mwh) of energy saved through ADM’s operational excellence initiatives in 2014

71,520 Number of U.S. homes whose annual energy needs could be met with 1.88 MWh of power (based on average U.S. residential consumption of 89.6 MMBtu/year)

$144.8 million Estimated cost to power 71,520 U.S. homes for one year (based on average spending of $2,024/year)

Sources: U.S. Energy Information Administration, ADM Operational Excellence leadership

EMISSIONS

Reducing Output on a Per-Unit-of-Production Basis

Emitted in emissions intensity achieved since our 2010 baseline.

From 2010 to 2014, thanks to a companywide energy-efficiency push, ADM succeeded in reducing CO₂ emissions intensity—the ratio of emissions to production volumes in our plants—by 8.6 percent. Emissions from ADM processing operations are primarily a function of energy use and the type of fuel we use to power our operations. As we continue implementing energy efficiency projects in our pipeline, we expect intensity to decline at a rate that will enable us to reach our goal of a 15 percent improvement by 2020.

Also in 2014, ADM participated in the Carbon Disclosure Project’s Climate Change survey with our first-ever public disclosure. Our survey response covered Scope 1 (direct) and Scope 2 (indirect) emissions for 2012 and 2013, as well as a host of information about the company’s energy use, risk-management practices and corporate responsibility initiatives.

PROGRESS AT A GLANCE

Companywide CO₂ emissions intensity improvement, 2010-14

-8.6% Reduction in emissions intensity achieved since our 2010 baseline.

-15% 2014 year-end

-15% 2020 goal

Companywide energy intensity improvement, 2010-14

-17.3% 2014 year-end

-15% 2020 goal

Companywide water intensity improvement, 2010-14

-19.1% 2014 year-end

-15% 2018 goal

Emissions and energy improvements are measured against 2010 baseline levels. For water, the improvement is determined against our 2008 baseline.
WATER

Efficiency Projects and Comprehensive Tracking Improve Results

-19.1%

Decline in ADM’s water consumption on a per-unit-of-production basis from 2008 to 2014 thanks to aggressive implementation of water reuse systems, investments in high-efficiency equipment, and operational improvements in boilers and cooling-tower systems.

Conservation initiatives advanced by ADM’s Corn and Oilseeds teams demonstrate how the company was able to surpass its target three years ahead of schedule.

• During the historic U.S. drought of 2012, water levels in Lake Decatur—which supplies the company’s large local processing complex—were declining, prompting the city to impose water-usage restrictions. In response, Corn Division teams at the complex installed equipment that enabled them to capture and recover more process water from wastewater—something the plant was already doing successfully—and use it to supply four cooling-tower systems. This generated savings of 1 million gallons of water per day at the complex—about 6 percent of its total usage.

• At the same time, ADM’s Decatur Oilseeds teams found an innovative way to displace potable water needed upstream at one of the soybean plants with recycled water. These projects netted another 1 million gallons per day in water savings.

Going forward, we will continue implementing efficiency projects worldwide with a view to achieving further improvements.

WASTE

Working to Reduce Waste Output Per Unit of Production

As we work toward a companywide tracking system for our waste streams, we have several ongoing projects designed to reduce our output at many of our worldwide facilities.

In 2014, ADM sweetener terminals in Salt Lake City and Langhorne, Pennsylvania, achieved zero landfill waste at their facilities.

One year earlier, the Salt Lake City terminal was sending nearly 2,000 pounds of waste to a landfill each month. By expanding the facility’s existing recycling program, more efficiently managing food waste and organic debris, directing the terminal’s sweet water waste to local beekeepers, and sending remaining waste to a nearby waste-to-energy plant, the facility was able to remove its dumpsters and replace its trash bins with recycling bins.

ADM’s Langhorne colleagues also took steps to make theirs a Zero Waste to Landfill facility by maintaining a single-stream recycling program—sending the terminal’s starch waste to a local pig farmer, sweet water waste to a nearby vinegar facility and remaining waste to local waste-to-energy facilities.
Innovating to serve customer needs, improve operational efficiency and further our competitive advantage

With more than 700 scientists and engineers around the world engaged in everything from process research to chemistry and biotechnology, animal nutrition, and food and beverage applications, ADM has averaged approximately 200 patents and published patent applications each year since 2009. At 40 R&D facilities worldwide, our teams innovate to improve the efficiency and environmental profile of our operations and develop novel new products that meet customers’ evolving needs.

OPERATIONAL EXCELLENCE

Pursuing Operational Excellence to Save Energy, Improve Yields, Achieve Cost-Savings

- **100+** Number of energy- and process-efficiency projects completed in our operations between 2013 and 2014.
- **$240 million** Total cost savings attributable to these efforts.
- **200+** Number of projects in our pipeline for 2015-2017.
- **$350 million** Anticipated additional cost savings resulting from successful completion of these projects.

ADM’s strategic approach to Operational Excellence emphasizes enhancing the efficiency of our production plants, standardizing best practices throughout our global operations, and promoting effective collaboration across business units and functions. Areas of focus include energy efficiency, yield improvement, water reduction, health and safety, product quality, and environmental stewardship.

Among the various types of projects in our pipeline are those aimed at improving maintenance and operational reliability, installing more energy-efficient equipment in our plants, enhancing data structure and analytics, and improving process controls. We are also focused on leveraging our core competencies in fermentation, separations and catalysis to drive yield improvements in our Corn and Oilseeds operations.
In 2014, Dr. Todd Werpy, ADM’s senior vice president, Research and Development, and Chief Technology Officer, received the American Chemical Society Affordable Green Chemistry award for his work in producing bio-based propylene glycol economically on a commercial scale.

ADM’s first-in-the industry process can produce 100,000 metric tons per year of propylene glycol from renewable sources.

The resulting bio-based product meets all of the same U.S. Pharmacopeia (USP) and industrial specifications as petroleum-based propylene glycol.

Werpy shared the award with Dr. John Frye and Mr. Alan Zacher of the Pacific Northwest National Laboratory (PNNL) in Richland, Washington.

**RENEWABLE CHEMICALS**

**Developing and Driving Adoption of a New Generation of Renewables**

ADM continues to invest in research to develop a broad range of renewable alternatives to petroleum-derived chemicals. Many of these chemicals, made from starch and oilseed-based feedstocks, are in the early development phase, while others are approaching the pilot-plant demonstration phase.

Among our successes to date and key works in progress:

- **Renewable propylene glycol:** Our USP-grade version is used in fragrances, cosmetics and personal-care products; food and flavorings; pet foods and animal feed; and pharmaceutical applications. Our industrial-grade PG is used in coolants and antifreeze; hydraulic and brake fluids; aircraft deicing fluid; heat transfer fluids; and paints and coatings. In March 2014, ADM and Hawkins, Inc. introduced Chill-Pro, a USDA-certified, biobased heat transfer fluid made with our propylene glycol. Chill-Pro is designed to maintain a constant temperature and provide superior freeze protection for closed-loop, water-based HVAC systems.

- **Ethanol improvements:** We continue to make process improvements to increase yields at our dry mills, which produce fuel ethanol as well as co-products such as distillers’ dried grains and solubles, or DDGS, for use in animal feed. Continued improvements allow us to reduce our energy use and improve our capital efficiency.

- **Investing in Rennovia:** a privately held company that develops catalysts and processes for the cost-advantaged production of chemical products from renewable feedstocks. We are optimistic that our collaboration with Rennovia will enable us to expand our portfolio of value-added renewable chemicals.

**CARBON SEQUESTRATION**

**Carbon capture and storage research programs progressing**

ADM is participating in two major research studies to determine whether carbon dioxide generated by industrial processes can be captured and stored permanently in underground rock formations, rather than being released into the atmosphere.

The research is being conducted in cooperation with the U.S. Department of Energy, the U.S. Geological Survey, the Illinois State Geological Survey, Richland Community College, and Schlumberger Carbon Services.

The first project, the Illinois Basin-Decatur project, is validating the use of the Mount Simon Sandstone—a saltwater-bearing rock formation that runs underneath the company’s Decatur, Illinois, processing complex—for geologic storage of carbon dioxide. In November 2014, the project successfully reached its goal of capturing and injecting 1,000,000 tons of carbon dioxide from ADM’s Decatur ethanol plant.

The second project, the Illinois-Industrial Carbon Capture & Sequestration Project, is designed to demonstrate the economic feasibility of capturing and storing commercial-scale volumes of carbon dioxide within the Mount Simon Sandstone. ADM has received permit approval, and is currently drilling the new injection well. We plan to complete the construction of the compression, dehydration, transmission, and storage facilities and begin injection by the third quarter of 2015.
TRANSPORTATION

Investing to Improve the Fuel Efficiency, Emissions Profile of our Transportation Network

Trucking

458,000 Gallons of fuel saved since 2008, when ADM began installing auxiliary power units in our North American trucking fleet to cool and heat the tractors’ cabs rather than relying on diesel fuel.

In addition, ADM, ADM Trucking and ADM Logistics have been certified as members of the U.S. Environmental Protection Agency’s SmartWay Partnership, a sustainability program aimed at reducing transportation-related emissions and improving fuel efficiency.

Oceangoing Vessels

27% Improvement in carbon emissions offered by two new ADM oceangoing vessels—the Harvest Frost and Harvest Moon—compared with conventional bulk carriers. Measuring 237 meters long by 40 meters wide, and capable of safely carrying 95,000 tons of cargo, these vessels employ Mitsubishi Heavy Industry’s proprietary Mitsubishi Air Lubrication System, which reduces the drag between vessel hull and seawater by blowing air bubbles at the vessel bottom—creating an "air carpet" that reduces friction and, subsequently, fuel consumption.

By installing auxiliary power units in our North American trucking fleet, ADM has saved 458,000 gallons of fuel since 2008.

River Transportation

10 Number of U.S. tugboats designed and deployed by ADM that incorporate: double-hull protection around the fuel and lubricant bunker tanks; energy-efficient, biodiesel-capable main engines and generators designed to deliver 10 to 12 percent fuel savings per year; and zero-discharge "gray water" systems, which treat all wastewater generated by the crew rather than discharging it into the water, as most vessels do.
ADM Cares: Investing in the future of agriculture and the well-being of our communities

Total grants provided by ADM since 2009 through ADM Cares, a social investment program that directs funds to initiatives and organizations that drive meaningful social, economic and environmental progress worldwide.

ADM Cares comprises three distinct focus areas: Strong Roots, which supports the responsible development of agriculture; Strong Communities, which emphasizes improving the quality of life in ADM communities; and Strong Bonds, which promotes employee giving and volunteer activities.

SOCIAL INVESTMENTS

$60,000,000

ADM Cares

STRONG ROOTS

Promoting Sustainable Agriculture

Through the Strong Roots component of ADM Cares, ADM funds initiatives that support safe, responsible and environmentally sound agricultural practices in critical growing regions in South America, North America, West Africa and Southeast Asia. The focus is on-farm and on-plantation health and safety programs for children and workers; responsible use of agricultural chemicals; sustainable farming practices; and rehabilitation and preservation of environmentally sensitive lands.

Among the organizations and programs we support:

Aliança da Terra: To date, we have contributed almost $1 million to the Brazilian sustainable farming group to promote the adoption of sustainable soybean farming practices that can improve yields and prevent expansion into ecologically sensitive areas. Most recently, we contributed $100,000 to help pre-certify 58 farms covering 63,000 hectares of soybean production in the greater Paragominas region in Brazil, and $100,000 to include 100,000 hectares in the Registry of Social-Environmental Responsibility in Mato Grosso, Brazil.

Asociación Jopoi: Since 2013, ADM Cares has contributed more than $80,000 to Asociación Jopoi to empower agricultural smallholders to improve the quality of life of low-income communities in Paraguay.

Living Lands & Waters: Since 2004, ADM has supported river clean-ups and tree-planting events throughout the U.S., with over $1.4 million in total contributions. In 2012, this included $200,000 to create a floating classroom barge—made of entirely repurposed items, many found during river clean-ups—to help educate classes about the importance of clean waterways.

Helping Indian farmers gain access to farm equipment: In 2014, ADM Cares provided $76,500 in financial assistance to Manavlok, an Indian NGO focused on providing economic opportunities to the rural poor, to help make farm machinery available at cost to smallholder farmers in the state of Maharashtra. In the program’s first season, 121 small farmers covering 348 acres switched from manual operations to mechanized cultivation.

National FFA Foundation: ADM supports the National FFA Foundation with an annual contribution of $275,000 to help develop the next generation of U.S. agricultural leaders.

Progressive Agriculture Foundation: Since 2013, we have contributed $225,000 to provide safety education days for more than 80,000 children per year throughout the U.S. and Canada.
University of Illinois Feed Processing Facility and Service Unit: ADM will provide $1.5 million to the University of Illinois at Urbana-Champaign over the next three years to develop a facility to investigate and determine the feed value of new ingredients produced for commercial livestock. Those ingredients include new products ADM will manufacture from our wet and dry corn milling and oilseeds processing facilities.

The university’s department of animal sciences is considered one of the top such departments in the U.S., and ADM’s grant, coupled with UIUC’s own fundraising efforts, will enable the construction of a feed mill and related research facilities.

Economic Development Corporation of Decatur & Macon County: ADM will provide $1.25 million over five years to support efforts to develop the Midwest Inland Port in Decatur, a multi-modal freight facility that offers access to three Class 1 railroads, five major roadways, an airport capable of handling widebody aircraft and ADM’s intermodal ramp, which—with two high-capacity cranes that can handle 50,000 containers per year—offers exceptional access to global markets for businesses and a unique platform for economic growth in central Illinois, home to ADM’s North American headquarters.

The ADM Institute for the Prevention of Postharvest Loss: Preserving Staple Crops to Help Feed the World

Since its establishment in 2011, the ADM Center for the Prevention of Postharvest Loss at the University of Illinois Urbana-Champaign has served as an international information and technology hub for evaluating, creating, and disseminating economically viable technologies, practices, and systems to reduce postharvest loss in staple crops. Since its establishment in 2011, the ADM Institute has quickly become a prominent leader in the field of postharvest loss prevention.

Its most notable accomplishments to date include:

- Involving about 1,500 farmers in postharvest research, knowledge exchanges and training. Through collaborations with partners such as the Bill & Melinda Gates Foundation, the Research Center for Rural Economy in China, the Rockefeller Foundation, Asia-Pacific Economic Cooperation and the United States Agency for International Development, the Institute has launched postharvest loss prevention projects in Bangladesh, Brazil, China, India and other nations.
- Funding a host of major research projects in the areas of measurement and technology development, systems informatics and analysis, policy analysis, and education, training and information-transfer.
- Launching an online course on fundamentals of postharvest loss prevention that has educated more than 3,900 learners from 153 countries around the world on its initial offering.
- Producing a series of animated extension videos with Scientific Animations Without Borders (SAWBO)—programs that were accessed by 200,000 farmers who learned about proper crop bagging, storage techniques and other crop loss prevention methods.

In October 2015, the Institute will co-organize the First International Congress on Postharvest Loss Prevention, a high-level cross-sector forum to be held in Rome.

Economic Development Corporation of Decatur & Macon County: ADM will provide $1.25 million over five years to support efforts to develop the Midwest Inland Port in Decatur, a multi-modal freight facility that offers access to three Class 1 railroads, five major roadways, an airport capable of handling widebody aircraft and ADM’s intermodal ramp, which—with two high-capacity cranes that can handle 50,000 containers per year—offers exceptional access to global markets for businesses and a unique platform for economic growth in central Illinois, home to ADM’s North American headquarters.

**STRENGTH COMMUNITIES**

Promoting a Better Quality of Life in our Cities and Towns

ADM provides our locations throughout the world with the tools to contribute to organizations and programs that help make a positive difference in the communities where we live and work. Our facility managers work with small teams to create giving plans that deliver maximum local impact.

Strong Communities focuses on education, environmental stewardship, and maintaining vibrant communities through grants to local schools and universities, hunger-relief organizations, local fire departments, local FFA chapters, Boys & Girls Clubs, Jobs for America’s Graduates and Habitat for Humanity.

Recent contributions have included grants in the following amounts to organizations in:

- **$650,000** South America, to support local fire and police departments, educational facilities, infrastructure repairs, sustainable agricultural practices, and nutritional programs.
- **$2,000,000** Decatur, Illinois
- **$400,000** Chicago
- **$260,000** Columbus, Nebraska
- **$200,000** Quincy, Illinois
- **$140,000** Clinton, Iowa
- **$110,000** Cedar Rapids, Iowa

**STRIONG BONDS**

Supporting Colleagues and Causes Worldwide

ADM Cares Strong Bonds Programs highlight colleagues’ contributions and efforts connected to social investing. ADM colleagues care about each other and the world around them. They have consistently demonstrated their care and concern by helping each other in times of need, donating money to non-profit institutions and volunteering time to worthy causes.

Recent contributions have included:

- **$200,000** to match colleagues’ personal philanthropic donations to qualified charities, schools, and local fire, police and rescue squads.
- **$140,000** in in-kind donations of ADM products, land and used equipment.
- **$12,000** in emergency funds to colleagues who faced unusual financial strain due to events beyond their control.
- **$12,750** in support for organizations where our colleagues volunteer through our Dollars for Doers program.
Sending More Colleagues Home Safe Than Ever Before

In 2014, more ADM colleagues went home safe than ever before as we achieved a 15.6% reduction in lost workdays and a 4.9% reduction in recordable injuries. The number of serious incidents and fatalities at our facilities also fell from 6.7 percent of recordable cases in 2013 to 4.3% in 2014.

Meanwhile, 77% of our locations successfully completed the year with no recordable injuries, while 92% had no lost workdays.

We will work to achieve further gains in 2015 by improving hazard recognition and elimination, continuing to standardize processes, and reinforcing our behavioral and Total Process Safety initiatives.
APPENDIX 1:
Our Commitment to No-Deforestation
As one of the world’s leading agricultural processors and food-ingredient providers, ADM commits to build traceable and transparent agricultural supply chains that protect forests worldwide.

Though we are not a grower of crops, we work independently and with industry partners and other stakeholders to improve the quality of crops in the global supply chain, the lives of farmers and communities that grow them, and the environment we share.

This commitment is advanced through policies focused on palm and soy supply chains.

**Palm Supply Chain Policies**

With rare exceptions, ADM is not a producer of palm oil and does not own palm plantations. Virtually all of our palm oil is sourced through other companies. We nonetheless work closely with customers and industry stakeholders to help develop a more sustainable supply chain for palm oil, palm kernel oil and their derivatives.

ADM hereby commits to the following standards in our palm oil supply chain:

1. **No Deforestation of High Carbon Stock (HCS) Forests or High Conservation Value (HCV) Areas**
2. **No Development on Peatlands, regardless of depth**
3. **No Exploitation of People and Local Communities**

**1. No Deforestation**

No Development in High Carbon Stock Forests

Our commitment classifies primary forests as well as High, Medium, Low Density and Regenerating forests as High Carbon Stock Forests. Young Scrub, Cleared/Open Land areas, existing plantations or other land already in agricultural production may be developed.

No Development in High Conservation Value Areas

We commit to preserving High Conservation Value land. ADM recognizes that in some instances, non-forest areas — particularly those with significant cultural or historical value — may also be considered High Conservation Value land. Such areas would fall within the scope of this policy.

**2. No new development on peatland, regardless of depth**

ADM will not accept new development of peatland, regardless of depth, for palm production. We remain committed to supporting RSPO Principles & Criteria Section 4.3 and the standards set forth in the RSPO manual on best-management practices for existing plantations on peatlands.

**3. No exploitation of people and local communities**

In accordance with our Commitment to Respect Human Rights, we require that stakeholders in the ADM supply chain:

- Comply with all applicable laws and regulations;
- Never use child labor, or forced and/or bonded labor;
- Do not charge fees to job-seekers in exchange for employment, do not use labor brokers who charge such fees, and do not withhold collateral in the form of money, identification or other personal belongings—without workers’ consent—as a condition of employment;
- Have appropriate measures in place to ensure eligibility for employment;
- Maintain systems and procedures designed to keep workers safe and protect them from occupational hazards, harassment and abuse;
- Do not discriminate in employment-related decisions;

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1. With the cooperation of the Government of Brazil, ADM has entered into a collaboration with more than 250 smallholder farmers and their families to develop a small (12,000-hectare) sustainable palm venture in Pará, Brazil. We are also a minority stakeholder in two Indonesian palm joint ventures with Wilmar. ADM does not otherwise own palm plantations.
3. ADM will use the Common Guidance developed by the HCV Network for the identification of these areas, available at: [https://www.hcnetwork.org/resources/cg-identification-apr-2014-english](https://www.hcnetwork.org/resources/cg-identification-apr-2014-english)
• Compensate workers in accordance with all applicable local laws and regulations—including those pertaining to age, minimum wage and hours worked—and provide working conditions that comply with applicable laws and industry norms;
• Respect workers’ rights, including contract, temporary and migrant workers, to the freedom of association and the right to collective bargaining;
• Facilitate the inclusion of smallholders into the supply chain;
• Respect land-tenure rights, and the rights of indigenous and local communities to give or withhold their free, prior and informed consent to operations on lands to which they hold legal or customary rights; and
• Work collaboratively with stakeholders to improve working, environmental and safety conditions in agricultural supply chains.

This policy applies across all palm oil supply chains in which ADM operates, from direct suppliers back to the source (plantation and smallholder-sourcing region), and for all companies in which ADM holds an ownership stake.

Implementation and Reporting: This policy is effective immediately. We understand that our palm suppliers may need time to implement the provisions described. We therefore expect our suppliers to develop action plans to achieve compliance by Dec. 31, 2015. We will partner with stakeholders to improve the performance of suppliers who do not adhere to these policies, but who are willing to commit to taking appropriate, immediate action to correct their violations. We will not conduct business with suppliers who violate this policy repeatedly and refuse to take action to comply.

ADM will work closely with The Forest Trust to begin mapping our palm oil supply chain and expeditiously develop appropriate action plans to create a more sustainable, traceable supply chain. These plans will also incorporate information gathered in the course of our implementation of Our Commitment to Human Rights. We will publish the action plans and provide regular updates of our progress.

Soy Supply Chain Policies
ADM does not grow soybeans, but rather purchases them primarily from third parties and cooperatives that combine crops from many growers. We commit to build a transparent, traceable soy supply chain that does not contribute to deforestation or exploitation. We recognize that this goal may be achieved in different ways in different countries and regions where we source, so we are currently working with partners and suppliers in a variety of ways:

1. ADM Responsible Soy Standard
In March 2015, we will launch the ADM Responsible Soy Standard in Brazil on a pilot basis, with a group of growers participating in the initial implementation. We will work with expert third-party inspectors to conduct annual inspections that will assess growers based on their adherence to a broad set of social, environmental, legal and agronomic standards, including their labor practices, water and soil usage, solid waste management, observance of land rights, legal compliance, and the responsible use of fertilizers.

2. IBAMA Embargo
In Brazil, ADM participates in the Brazil Institute of Environment and Renewable Natural Resources embargo. Under this agreement, surveillance of deforested areas is made by satellite imaging and, if a producer clears a small fraction of native vegetation on his property and plants soy in this area, all of the farm’s production becomes ineligible for trading.

3. Brazilian Soy Moratorium
We have joined with fellow industry participants to promote a sustainable supply chain for South American soybeans through our support of the Brazilian soy moratorium, which since 2006 has prohibited participants from trading, acquiring or financing soybeans from areas of the Amazon Biome that were deforested after July 2008.

In addition, ADM was the first company in South America to achieve the International Sustainability and Carbon Certification (ISCC) for soybeans by collaborating with growers in both Brazil and Paraguay to successfully complete exacting third-party audits.

We also work with Aliança da Terra—an NGO founded by farmers—to help Brazilian soy growers adopt sustainable agronomic practices. Under the Doing It Right program, soybean farmers allow ADT technicians to map their property and analyze their operations. From there, the organization develops a social and environmental action plan for the farmer and evaluates progress annually. To date, the project has resulted in the mapping of more than 600,000 hectares of soybeans.

4. No exploitation of people and local communities
In addition to being a signatory to the National Agreement to Eradicate Slave Labor in Brazil, our Commitment to Respect Human Rights, extends to all stakeholders in the ADM soy supply chain:

• Comply with all applicable laws and regulations;
• Never use child labor, or forced and/or bonded labor;
• Do not charge fees to job-seekers in exchange for employment, do not use labor brokers who charge such fees, and do not withhold collateral in the form of money, identification or other personal belongings—without workers’ consent—as a condition of employment;
• Have appropriate measures in place to ensure eligibility for employment;
• Maintain systems and procedures designed to keep workers safe and protect them from occupational hazards, harassment and abuse;
• Do not discriminate in employment-related decisions;
• Compensate workers in accordance with all applicable local laws and regulations—including those pertaining to age, minimum wage and hours worked—and provide working conditions that comply with applicable laws and industry norms;
• Respect workers’ rights, including contract, temporary and migrant workers, to the freedom of association and the right to collective bargaining;
• Facilitate the inclusion of smallholders into the supply chain;
• Respect land-tenure rights, and the rights of indigenous and local communities to give or withhold their free, prior and informed consent to operations on lands to which they hold legal or customary rights; and
• Work collaboratively with stakeholders to improve working, environmental and safety conditions in agricultural supply chains.

Implementation and Reporting: We will continue to comply with the terms of the Soy Moratorium and adhere to all other laws and regulations governing biodiversity and conservation in every jurisdiction where we operate.

Beginning in 2015, ADM will work with The Forest Trust to begin mapping our soybean supply chain against HCS forests, HCV areas and peatlands as defined above and expeditiously develop appropriate action plans to create a more sustainable, traceable soybean supply chain that protect these areas. These plans will also incorporate information gathered in the course of our implementation of Our Commitment to Human Rights. We will publish the action plans and provide regular updates of our progress.

This policy will be updated as circumstances and events warrant.

March 2015
OUR COMMITMENT TO RESPECT HUMAN RIGHTS

As a global agricultural processor whose purpose is to serve vital needs, Archer Daniels Midland Company connects the harvest to the home worldwide. We source crops from farmers in the world’s major growing regions, transport them to more than 270 processing facilities, and convert them into a wide variety of food ingredients, animal feeds and renewable industrial chemicals and energy products.

ADM operates in more than 75 countries around the world, and its 31,000 colleagues are united by six values that demonstrate our insistence on achieving the right results, the right way: Integrity, Respect, Excellence, Resourcefulness, Teamwork and Responsibility. ADM’s commitment to human rights embodies and reflects these values, particularly Respect, which we define as follows:

“We feel a deep and genuine regard for the safety and well-being of all people, communities and resources, and we treat them with care and consideration. We demonstrate trust and openness. And, we are good stewards of the environment.”

Our role

We believe that although governments have the primary duty to protect and ensure fulfillment of human rights, we have a responsibility to respect human rights and can play a positive role in the communities where we operate. While we generally are not growers, ADM’s scale, reach and vast supplier network give us the opportunity to help improve the conditions under which crops are grown, transported and marketed around the world, as well as the lives of those who grow them and of other workers and communities along the supply chain.

We work collaboratively with stakeholders—including other industry participants, governments and NGOs—to address opportunities for improvement in the agricultural supply chain, including worker rights and conditions, on-farm health and safety, and the land rights of indigenous peoples.

ADM also maintains its own standards, policies and practices to ensure that our colleagues, our suppliers and their contractors respect workers’ rights and comply with all applicable local, national and international laws governing working conditions.

Scope

This commitment to respect human rights is informed by international law and by the principles of liberty and dignity enshrined in the United Nations Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights.

This statement applies to all employees, officers, directors, contract workers and agents of ADM, our divisions and our affiliates in all countries. ADM expects that, when working on our behalf, our suppliers, business partners, agents and consultants will uphold the principles of this commitment.

Our standards and expectations

Our standards for ADM colleagues are included in our ADM Code of Conduct, updated in January 2013, which states:

“ADM is committed to honoring the rights of our employees, as well as complying with all applicable wage and hour laws in all areas of the world where we have operations. In addition, ADM expects our business partners to treat their employees with dignity and respect, and follow local employment laws. We will never knowingly use any suppliers who employ or exploit legally underage workers or forced labor. We do not condone such practices.”

We will develop and strengthen relationships with contractors and suppliers who are committed to the principles set forth below. We expect that suppliers:

- Never use child labor, or forced and/or bonded labor;
- Do not charge fees to job-seekers in exchange for employment,
- do not use labor brokers who charge such fees, and do not withhold collateral in the form of money, identification or other personal belongings—without workers’ consent—as a condition of employment;
- Have appropriate measures in place to ensure eligibility for employment;
- Maintain systems and procedures designed to keep workers safe and protect them from occupational hazards, harassment and abuse;
- Do not discriminate in employment-related decisions;
- Compensate workers in accordance with all applicable local laws and regulations—including those pertaining to age, minimum wage and hours worked—and provide working conditions that comply with applicable laws and industry norms;
• Respect workers’ rights, including the right to freedom of association and collective bargaining;
• Respect land-tenure rights, and the rights of indigenous and local communities to give or withhold their free, prior and informed consent to operations on lands to which they hold legal rights; and
• Work collaboratively with stakeholders to improve working, environmental and safety conditions in agricultural supply chains.

Our commitment
If we learn that any supplier does not satisfy the principles above or misrepresents the conditions under which crops, goods or services have been produced, ADM will take appropriate action. If that supplier does not demonstrate a good-faith effort to address issues in a timely manner, those actions may include exclusion from new direct contracts or the termination of our relationship.

Process for implementation
A copy of this statement will be provided to ADM’s direct suppliers. In addition, it will be posted in areas where we interact with suppliers.

This commitment’s provisions also will be communicated directly to employees through internal channels such as the company’s annual compliance training, prominent workplace postings, ADM’s intranet and other strategic communications vehicles.

In addition, ADM will develop, in a timely manner, a due diligence process to help identify and effectively address incidents of concern that arise in the agriculture supply chain. This process, when finalized, will be broadly communicated.

Following the development of our due diligence process, we will incorporate these commitments into direct supplier contracts.

We will report publicly on the implementation and results of our commitment to respect human rights.

Issue resolution
Individuals with concerns about supplier-related issues are encouraged to contact the ADM Helpline at www.theadmwayhelpline.com, or call any of the numbers listed in the column at right.

ADM Helpline contact numbers

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<tr>
<th>Country</th>
<th>Contact Number 01</th>
<th>Contact Number 02</th>
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<tr>
<td>Argentina</td>
<td>0800.666.2529</td>
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<tr>
<td>Australia</td>
<td>1.800.38.7434</td>
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<tr>
<td>Austria</td>
<td><a href="http://www.theadmwayhelpline.com">www.theadmwayhelpline.com</a></td>
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<tr>
<td>Barbados</td>
<td>1.800.225.5288, then 800.728.7907</td>
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<td>Belarus</td>
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<tr>
<td>Belgium</td>
<td>0.800.100.10, then 888.288.1446</td>
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<td>Belize</td>
<td>811, then 800.728.7907</td>
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<td>Bolivia</td>
<td>800.10.0499</td>
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<td>0800.891.4301</td>
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<td>704.540.2921</td>
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<td>Canada</td>
<td>1.888.423.6929</td>
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<tr>
<td>Chile</td>
<td>800.360.311, then 800.443.6192</td>
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<tr>
<td>China</td>
<td>10.800.711.0716 or 10.800.110.0657</td>
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<td>Colombia</td>
<td>01.800.911.0010, then 888.443.6192</td>
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<td>0800.90.0692</td>
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<td>800.96.1111, then 800.443.1978</td>
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<td>India</td>
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<td>Mexico</td>
<td>001.877.563.6957</td>
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<tr>
<td>Peru</td>
<td>Perú (Americana): 0-800-70-088; Perú (Telefónica): 0-800-50-288; Perú (Telefonica - Spanish): 0-800-50-500, then 800-443-6192</td>
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<td>Ukraine</td>
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<td>United Kingdom</td>
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APPENDIX 3:

Environmental Policy
ENVIRONMENTAL POLICY

Being good stewards of the environment is part of ADM’s value of respect. This policy lays out ADM’s commitments and expectations regarding environmental stewardship.

Scope
This policy applies to all ADM operations, company employees, and any person or entity for which ADM has responsibility or control. Hereinafter, these individuals and entities will be collectively referred to as “colleagues.”

Policy Statement
ADM is committed to meeting its environmental obligations, while pursuing ways to continually improve its efforts in both protecting the environment and enhancing environmental sustainability.

ADM’s Commitment
To meet environmental obligations to colleagues, communities and the government, ADM will:

• establish programs and practices intended to ensure operations are conducted in an environmentally sound manner and that applicable laws and regulations are followed;
• commit the necessary employee and management resources to support and implement these programs and practices;
• perform periodic evaluations to ensure that the ADM environmental programs and practices established to support these requirements are working effectively;
• communicate and reinforce accountability for environmental stewardship throughout the company;
• provide training as needed to assist colleagues in understanding their environmental responsibilities and carrying out their job duties in ways consistent with sound, environmental practices;
• participate constructively within the process of creating reasonable environmental laws, regulations, policies and guidelines to safeguard the workplace, the community and the environment; and
• develop, design and operate facilities and conduct activities taking into consideration the efficient use of energy and materials, environmental impact, and safe and responsible management of waste.

Colleague Expectations
ADM expects all colleagues to support and implement programs and practices that allow ADM to conduct business in an environmentally sound manner.

Colleagues must:
• understand the potential environmental impacts of their job responsibilities;
• participate in training programs designed to educate them about those responsibilities and other issues as deemed necessary by the company’s corporate environmental leadership, local, regional and business unit environmental management, operations groups and/or human resources functions;
• work to minimize the risk of environmental hazards;
• comply with environmental laws and/or regulations, as well as company-imposed requirements; and
• promptly report all incidents and unsafe environmental conditions to local, business unit and corporate environmental resources.

It is the responsibility of each colleague to familiarize themselves with this policy and to comply with it. Failure to follow the policy will result in appropriate disciplinary action, up to and including termination of employment.

Accurate Books and Records
Colleagues must ensure that ADM maintains and keeps books and records which, in reasonable detail, accurately and fairly reflect any environmental requirements imposed by governments and the company itself.

Colleagues or any other person who conducts business on behalf of ADM shall not knowingly disguise or falsify any records or documents in ways that would violate the law or this policy.

Records
Every ADM employee is responsible for handling and managing their records in accordance with the ADM Records Management Policy and Procedures. The Records Management Program currently applies to all North American locations. Locations outside the U.S., Canada and Mexico must keep environmental records while they are active and then for the additional retention period required by the local government. Questions regarding records retention should be directed to your department/ location’s designated Records Coordinator or to the Corporate Records Manager.
Responsibility for helping ADM uphold its commitment to environmental stewardship rests with all colleagues. As noted in Section 3, the company’s role is to provide training, guidelines and other resources to ensure colleagues are able to carry out their responsibility.

**Guidance**
Sources for advice include:

- your immediate supervisor
- local, regional and divisional environmental managers
- ADM’s Technology Center environmental team
- Corporate environmental counsel
- ADM’s Compliance Officer
- ADM WAY Helpline