



Environmental Policy

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Objective, Scope and Policy Statement

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.

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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.

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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.

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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.

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Training, Guidance and Revision History

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

Revision History

Version 1.0 – released 4 April 2013

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