

US corporate human rights index: Tracking changes in company commitments to human rights

Findings as of July 2025

Archer Daniels Midland (ADM)

Indicator	Finding	Source	Source Link
Policies and commitments			
<u>General</u>			
Human rights policy - UNGPs	<p>We commit to protect and respect the human rights of our employees, those within our value chain, and in the communities in which we operate. We strive to promote human rights in accordance with the UN Guiding Principles on Business and Human Rights' three pillars. [...] This policy applies to all employees, officers, directors, contract workers and agents of ADM, our divisions and our affiliates in all countries. In addition, ADM expects that our direct and indirect suppliers, business partners, agents and consultants uphold these principles.' [Human Rights Policy 2021, 1]</p> <p>'This policy is in accordance with company values and these external publications [...] United Nations (UN) Universal Declaration of Human Rights.' [Human Rights Policy 2021, 4]</p>	Human Rights Policy	https://www.adm.com/globalassets/sustainability/goals--programs/human-rights-policy/human-rights-policy-2021-update-2.pdf/
Human rights policy - ILO Core Labor Standards	Above, plus: 'This policy is in accordance with [...] Fundamental Principles and Rights at Work of the International Labour Organization (ILO)	Human Rights Policy, pg 4	https://www.adm.com/globalassets/sustainability/goals--programs/human-rights-policy/human-rights-policy-2021-update-2.pdf/
Forced labor & prison labor	We prohibit the use of all forms of forced labor, including bonded labor, indentured labor, and child labor in our operations and our supply chains	Human Rights Policy, pg 2	https://www.adm.com/globalassets/sustainability/goals--programs/human-rights-policy/human-rights-policy-2021-update-2.pdf/
Human rights defenders & civic space	<p>ADM is committed to the protection of Human Rights Defenders, whistle-blowers, complainants, and community spokespersons, including those defined in the RSPO Human Rights Defenders Policy...</p> <p>...ADM expects that our direct and indirect suppliers, business partners, agents and consultants uphold these principles.</p>	Human Rights Policy	https://www.adm.com/globalassets/sustainability/goals--programs/human-rights-policy/human-rights-policy-2021-update-2.pdf/
Gender equality and women's empowerment	As a global organization, the Company is strongly committed to a culture of inclusion and belonging. ADM fundamentally values the differences between individuals and believes a variety of perspectives and backgrounds support innovation, growth, and value creation.	2025 Proxy Statement 2024 Form 10-K	https://investors.adm.com/financials/annual-reports/default.aspx
Indigenous Peoples <u>Natural resources</u>	See Land Rights; in addition, 'Respect Indigenous and Local Community rights to land	Policy to Protect Forests,	https://www.adm.com/globalassets/sustainability/goals--

Land rights	We respect land-tenure right and the rights of indigenous and local communities to give or withhold their free, prior and informed consent (FPIC) to operations on lands to which they hold legal or customary rights. We expect all suppliers to uphold the principles of FPIC in their operations and business dealings.	Human Rights Policy	https://www.adm.com/globalassets/sustainability/goals--programs/human-rights-policy/human-rights-policy-2021-update-2.pdf/
Free, Prior, and Informed Consent (FPIC)	See Land Rights		
<u>Living wage</u>			
Living wage, own operations	All employees in our operations and supply chain will be compensated in accordance with all applicable local laws and regulations including those related to minimum wage and overtime pay.' [Human Rights Policy 2021, 2-3]	Human Rights Policy	https://www.adm.com/globalassets/sustainability/goals--programs/human-rights-policy/human-rights-policy-2021-update-2.pdf/
Living wage in supply chain	No evidence		
Human rights due diligence and supply chain			
Process for assessing human rights risks and impacts	<p>In 2023, we finalized our Supply Chain Due Diligence Standard Operating Procedure (SOP). The SOP serves as a guide to implement the Supply Chain Due Diligence (SCDD) process, which aims to prevent, resolve and/or mitigate adverse impacts on people and the environment in our supply chain. [2024 Report]</p> <p>Assessing Impacts: Available systems and sourcing procedures in every region will be assessed to understand potential risks throughout the supply chain. We will maintain traceability for high risk commodities and geographies that enables the identification of crop sourced to the lowest possible unit. [Human Rights Policy]</p> <p>ADM conducts social compliance audits throughout our operations to verify compliance with our policies. Audit frequency is based on facility size, number of employees, geography, and number/severity of findings from previous audits. Findings and observations are reviewed with the facility and with sustainability team to ensure all issues are addressed. [Human Rights Policy]</p>	<p>2024 Sustainability Report, pg 37</p> <p>Human Rights Policy, pg 3</p>	<p>https://www.adm.com/globalassets/sustainability/sustainability-reports/final_archer-daniels-midland-adm_2023-corporate-sustainability-report_51424.pdf</p> <p>https://www.adm.com/globalassets/sustainability/goals--programs/human-rights-policy/human-rights-policy-2021-update-2.pdf/</p>
Heightened human rights due diligence in Conflict Affected and High Risk Areas (CAHRAs)	No evidence		
Affected stakeholder engagement	Where applicable, we strive to engage with employees, communities, civil society and other stakeholders to address risks along our value chain.	Human Rights Policy	https://www.adm.com/globalassets/sustainability/goals--programs/human-rights-policy/human-rights-policy-2021-update-2.pdf/
Human rights requirements in supplier code/requirements	All suppliers are expected to adhere to ADM's sustainability policies, including the Human Rights Policy and the Policy to Protect Forests, Biodiversity and Communities , as well as the provisions in the following sections (Labor Conditions and Human Rights; Environment and Land Rights).	ADM Supplier Expectations	https://www.adm.com/globalassets/procurement/suppliers/potential-suppliers/supplierexpectations---english-2022-_10-28-22_.pdf

Access to remedy

Grievance mechanism for own employees	Stakeholders, including ADM employees, supply chain workers, and community members, who have issues or concerns related to the implementation of our policies are encouraged to contact the ADM Way Helpline at www.TheADMWayHelpline.com . Where local law permits, concerns can be reported anonymously. Phone numbers for specific geographies are listed on the website.	Human Rights Policy	https://www.adm.com/globalassets/sustainability/goals--programs/human-rights-policy/human-rights-policy-2021-update-2.pdf
Grievance mechanism for workers - supply chain	See above		
Grievance mechanism for external individuals & communities	See above		
Governance and staffing			
Board and/or C-Suite-level oversight	The implementation of this policy is the responsibility of the ADM Sustainability team led by its Chief Sustainability Officer (CSO). The CSO provides sustainability updates to the Board of Directors at each quarterly meeting. The Sustainability & Corporate Responsibility Committee has direct oversight responsibility of the objectives, goals, strategies, risks and activities of the company related to sustainability, including its human rights program and reviews progress and updates on a quarterly basis.	Human Rights Policy	https://www.adm.com/globalassets/sustainability/goals--programs/human-rights-policy/human-rights-policy-2021-update-2.pdf
Senior level responsibility for human rights	See above		
Reporting and transparency			
Human rights reporting (integrated or stand-alone)	2022 Human Rights Standalone; 2024 Sustainability (includes human right)	ADM Human Rights Policy Implementation 2022	https://www.adm.com/globalassets/sustainability/sustainability-reports/2022-reports/adm-human-rights-report_2022.pdf
		2024 Sustainability Report	https://www.adm.com/globalassets/sustainability/sustainability-reports/final_archer-daniels-midland-adm_2023-corporate-sustainability-report_51424.pdf
Memberships			
RBA	No	RBA	https://www.responsiblebusiness.org/about/members/
RSPO	Yes	RSPO	https://rspo.org/search-members/
WEPs (signatory)	No	WEPs	https://www.weps.org/companies
Lobbying and ethics			
Public statement or endorsement in support of mandatory human rights and environmental due diligence	No evidence		
Anti-bribery and anti-corruption policy	ADM has a robust anti-corruption program that includes a global Anti-Corruption Policy and other compliance procedures and controls designed to minimize the potential for corruption in ADM's global business dealings. The company raises awareness about anti-corruption laws in order to avoid inadvertent violations of the law and to enable early recognition and handling of potential issues.	Commitment to Anti-Corruption Compliance	https://www.adm.com/globalassets/sustainability/goals--programs/responsible-sourcing/commitment-to-anti-corruption-compliance.pdf

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