



# Human Rights Policy

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Approver: Juan R. Luciano

Chairman and CEO

# Index

1.0	Objective	2
2.0	Scope and Policy Statement	2
3.0	Definitions	3
4.0	Standards	4
5.0	Implementation	5
6.0	References	6
7.0	Revision History	6

# 1.0 Objective

This policy contains the minimum requirements to protect the rights, safety and well-being of all people, communities and resources in our direct operations and our supply chain.

## 2.0 Scope and Policy Statement

### 2.1 Scope

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 suppliers, business partners, agents and consultants uphold these principles.

### 2.2 Policy Statement

Archer Daniels Midland Company creates long-term value by providing innovative, responsibly-sourced ingredients for a growing population. ADM colleagues are united through 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 company values, and specifically 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.”

# 3.0 Definitions

## 3.1 Child Labor

Work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development.

3.1.1 This includes work that

- Is mentally, physically, socially or morally dangerous and harmful to children; and
- Interferes with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely, or requiring them to attempt to combine school attendance with excessively long and heavy work.

3.1.2 This includes the worst forms of child labor listed in ILO convention 182, and specifically:

- All forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labor, including forced or compulsory recruitment of children for use in armed conflict;
- Work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.

## 3.2 Forced Labor

All work or service which is exacted from any person under the threat of any penalty and for which the said person has not offered himself voluntarily.

## 3.3 Minimum Age

The minimum age for admission to employment:

<b>Work</b>	<b>Age</b>
Hazardous Work (any work which by its nature or the circumstances in which it is carried out is likely to jeopardize the health, safety or morals of young persons)	18 years
Minimum age for work	15 years or minimum age to finish compulsory schooling.
Light work, as long as it does not threaten their health and safety or hinder their education or vocational orientation and training	13-15 years

# 4.0 Standards

- 4.1 ADM expects the below standards to be upheld and will work to develop and strengthen relationships with contractors and suppliers who do so.
  - 4.1.1 Never use child labor, forced labor or bonded labor.
  - 4.1.2 Do not charge fees to job-seekers in exchange for employment or use labor brokers who charge such fees.
  - 4.1.3 Do not withhold collateral in the form of money, identification or other personal belongings – without workers’ consent – as a condition of employment.
  - 4.1.4 Have appropriate measures in place to ensure eligibility for employment.
  - 4.1.5 Maintain systems and procedures designed to keep workers safe and protect them from occupational hazards, harassment and abuse.
  - 4.1.6 Do not discriminate in employment-related decisions.
  - 4.1.7 Respect the right to safe and clean drinking water and sanitation in our operations and supply chain.
  - 4.1.8 Compensate workers in accordance with all applicable local laws and regulations – including those pertaining to minimum age, minimum wage and hours worked – and provide working conditions that comply with applicable laws and industry standards.
  - 4.1.9 Respect workers’ rights, including freedom of association and collective bargaining.
  - 4.1.10 Respect land-tenure right 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.
  - 4.1.11 Work collaboratively with stakeholders to improve working, environmental and safety conditions in agricultural supply chains.

**4.2** Upon discovery of any supplier, contractor, or business partner that does not satisfy the standards in 4.1 above or that misrepresents the conditions under which crops, goods or services have been produced, ADM will take appropriate action. If that party does not demonstrate a good-faith effort to address issues in a timely manner, those actions may include:

**4.2.1** Exclusion from new direct contracts

**4.2.2** Termination of relationship

## **5.0 Implementation**

### **5.1 Training and Awareness**

**5.1.1** Employees – This policy will be communicated to employees through internal channels such as compliance training, workplace postings and ADM’s intranet.

**5.1.2** Suppliers – This policy will be communicated to suppliers through direct communication, posting in areas that are visible to suppliers, and inclusion in supplier contracts and/or incorporation via ADM’s [Supplier Expectation Guidelines](#).

### **5.2 Communication on Progress**

To support transparency in the supply chain, ADM will regularly publish reports outlining implementation and results of this policy at [www.adm.com/ProgressTracker](http://www.adm.com/ProgressTracker).

### **5.3 Issue Resolution**

**5.3.1** Stakeholders who have issues or concerns related to the implementation of our policies are encouraged to contact the ADM Way Helpline at [www.TheADMWayHelpline.com](http://www.TheADMWayHelpline.com). Phone numbers for specific geographies are listed on the website.

**5.3.2** Issues will be reviewed and addressed using the workflow posted in our [Issues and Resolutions Procedure](#).

**5.3.3** An [updated log](#) of issues and resolutions will be maintained and available publicly through our website.

# 6.0 References

6.1 Internal – These additional policies support and complement this policy:

[ADM Code of Conduct](#)

[ADM No-Deforestation Policy](#)

[ADM Supplier Expectation Guidelines](#)

6.2 External – This policy is based on company values and these external publications:

[International Labour Organization \(ILO\) Conventions 29, 105, 138 and 182](#)

[United Nations \(UN\) Universal Declaration of Human Rights](#)

[UN Guiding Principles on Business and Human Rights](#)

[UN General Assembly Resolution A/RES/64/292](#)

# 7.0 Revision History

Version	Date Published	Description of Change(s)
1.0	2014	N/A - Initial publication
2.0	09/15/17	Updated format, added definitions and references sections, updated standard language, added right to water and sanitation.