PUBLIC RESPONSES

1. Please provide one or two examples that demonstrate how your company has identified, assessed, and mitigated risks to Human Rights Defenders through its human rights and environmental due diligence processes since the adoption of your commitment.

For information on our due diligence and risk identification processes, see our Sustainability Report (pages 25-26) and Human Rights Disclosure. We do not have specific examples to share related to Human Rights Defenders.

2. What steps does your company take to ensure that affected or potentially affected stakeholders - including local communities, Indigenous Peoples, workers, and civil society organisations - are aware of its commitments regarding Human Rights Defenders? Please provide an example of how these commitments have been communicated in practice.

Our Human Rights Policy and grievance reporting mechanism are accessible to external parties. As detailed in our integrated sustainability report, palm suppliers are scored and engaged on their monitoring, engagement and grievance mechanisms.

3. What steps does your company take to ensure that business partners - including suppliers, contractors, and other relevant business relationships - understand and respect its commitments regarding Human Rights Defenders? Please provide an example of how a business partner has engaged with or implemented these commitments.

Our Human Rights Policy and grievance reporting mechanism are accessible to external parties. Please see our human rights policy and disclosure, supplier expectations document, and the supplier due diligence section of our 2025 sustainability report, to better understand how palm suppliers are scored and engaged on their monitoring, engagement and grievance mechanisms.

4. Please provide an example of how a Human Rights Defender or affected community member safely raised a concern related to your company's operations, projects, or business relationships, and describe the steps the company took to address the concern and prevent retaliation.

See our Grievance Log, including an incident in 2024 related to human rights defenders. As of 2026, "ADM continues monitoring, given that the cases remain under ongoing engagement, mediation processes and implementation of action plans, with no new verified evidence warranting escalation at this point." Should further concerns be raised,

they would be addressed through this same grievance mechanism and managed in accordance with our grievance procedure, including investigation, stakeholder engagement, remediation where appropriate, and measures to prevent retaliation.