

Human Rights Policy



Revision History

| Version No. | Date | Summary of Changes | Author | Reason |
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Purpose

The purpose of this policy is to establish a framework for protecting and promoting human rights across adm Indicia's global operations, value chain, and in line with international standards and best practice.

Our business decisions and partnerships can have a real impact on people's lives, and we take that obligation seriously. Human rights are everyday realities that shape individual lives. As a company with a global reach, we therefore recognize our responsibility to uphold the values that put people at the centre of our business, not just in theory, but more importantly, through meaningful action.

At adm Indicia we believe that the protection and advancement of human rights is integral to our mission and core values. Through our sustainability program 'From Purpose to Impact', we want to make sure that best practice is maintained, both within our core business, and across our sourcing activities.

Human rights are basic rights inherent to all human beings, regardless of nationality, place of residence, gender, sexual orientation, national or ethnic origin, colour, religion, language, or any other status.

Our Commitments

This Human Rights Policy sets out our commitment to respecting, protecting, and promoting internationally recognized human rights across our own operations, supply chain, and business relationships.

adm Indicia upholds all human rights and maintains the highest standards of ethical and business conduct, ensuring compliance with applicable laws and regulations, as well as our internal policies, practices, and procedures.

The policy is guided by the UN Guiding Principles on Business and Human Rights (UNGPs), the Universal Declaration of Human Rights (UDHR), and the Ten Principles of the UN Global Compact (UNGC). It is further supported by the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work and by applicable local laws.

In addition, this Human Rights policy exists to:

- Inform all our stakeholders including employees, business partners, contractors, suppliers, and customers of adm Indicia's commitment to human rights.
- Confirm implementation of robust human rights due diligence processes to identify, prevent and address any potential or actual negative human rights impacts across

our operations and value chain. We also take appropriate steps to remediate impacts if they occur.

- Support our annual reporting on impact, achievements, and progress against sustainability targets.
- Contribute to the advancement of human rights globally.

Scope

As set out in our Code of Conduct for Employees and Code of Conduct for Suppliers, the objective of adm Indicia's documented policies is to provide an overview of expectations for all employees and business partners.

This policy therefore applies to:

- All employees, including part-time and temporary workers, managers, agency workers, and joint ventures where adm Indicia has a controlling interest.
- All locations and companies under operational control.
- All third-party contractors, agents, suppliers, strategic partners and consultants representing or acting on behalf of adm Indicia.

It encompasses human rights principles such as fair labour practices, non-discrimination, health and safety, and just working conditions.

In this Policy "adm-Indicia" means and includes adm (Group) Limited and all affiliates, subsidiaries, and any other entities under its control or within its corporate group. adm-Indicia ("adm-Indicia", "us", "we") is dedicated to conducting business and relationships in a lawful manner.

Governance and Accountability

At adm Indicia we view respect for human rights as a collective responsibility, shared across the entire organisation. Oversight on human rights is firmly integrated into our broader corporate governance structure, extending from Board-level, through to dedicated committees and operational implementation by Group-level functions and individual business units. This structure ensures that our human rights commitments are embedded into decision-making at every level of the company.

This policy outlines our individual and shared responsibilities to human rights. It is available to all adm Indicia employees and publicly on our website.

The policy and its associated practices are owned and managed by the Global Sustainability team, responsible for the development, implementation, maintenance, and communication of the policy. Oversight and formal approval of the policy are provided by the adm Indicia Policy Committee and Group Steering Committee.

To ensure our commitments are carried through into our supply chain, adm Indicia business partners are members of SEDEX, the Supplier Ethical Data Exchange, and we request suppliers are likewise, to maintain supplier compliance with adm Indicia's Codes of Conduct and principles.

Our CEO, CSO and Executive Team are accountable for policy enforcement. Progress is reported annually in sustainability disclosures.

Individuals and groups that may be impacted

There are several ways companies can impact human rights through their own business activities or indirectly through those of whom they do business with. In adm Indicia, we have identified the following stakeholder groups that could stand the most risk of being negatively impacted by the activities that we do as a business:

- adm Indicia's own employees and contract workers.
- Employees and contract workers of companies that contribute to our operations, products or services through their value chain.
- Communities and individuals affected by the company's operations.
- Other stakeholder groups that may be affected through adm Indicia's activities or business relationships.

Certain groups could be particularly vulnerable to impacts in some circumstances, for example, children, women, migrant, minority or ethnic groups.

Implementation

To demonstrate the effectiveness of our actions, and communicate our performance transparently, we are working to increasingly embed human rights performance into our sustainability metrics through clear, measurable KPIs. These indicators will allow us to track progress over time, identify areas for improvement, and importantly measure our impact.

By aligning these metrics with our broader reporting framework, we want to integrate human rights more deeply into our decision-making processes and day-to-day activities.

This policy supports adm Indicia's ongoing improvement in human rights performance by embedding standards and guidance into its business operations, and by regularly reviewing and updating its approach as its sustainability program matures and business needs evolve.

1. Diversity, Equity & Inclusion

Diversity is an important part of who we are. Our vision is to ensure that all of our people can reach their full potential without having any unfair barriers put in their way.

We respect the varied diversity characteristics (including race, disability, gender, LGBTQIA+, mental health, religion, belief and age and anything else that's important to people) of every one of our team members and others in our networks.

As a business, we believe that our diverse mix of backgrounds, skills and experiences drives new ideas, products, and services and provides us with a sustained competitive advantage. At the time of publication, we have 1300+ employees across the globe who are spread over more than 36 countries and represent numerous, varied diversity characteristics.

adm Indicia strives to foster an equitable and inclusive culture and are committed to evolving our range of benefits and employee engagement initiatives to support our people. Our approach to DEI and the absence of discrimination involves active contributions to ensure equal opportunities for all employees. This includes implementing fair hiring practices, providing equitable access to career development and advancement, compensation, and promoting a culture of respect and inclusion. We carefully nurture our employees making sure that individuals, regardless of their background, identity, or circumstances, feel valued, accepted, and supported to succeed.

Our target of actively encouraging women into leadership continues to be a core foundation of our DEI program and, by 2030, we'll ensure 40% female representation across our Global Leadership Team.

The company's DEI approach focuses on preventing all forms of discrimination, assuring equitable treatment and an inclusive workplace for all employees. We commit to mitigating and addressing discrimination by ensuring all reported cases are promptly investigated and resolved, strengthening employee confidence in speak-up mechanisms, and reducing any verified incident through continuous improvements.

2. Safe & Healthy Working Conditions

Working to ensure the health and safety of individuals within our scope of operations is a fundamental human rights obligation and an integral part of our assurances to dignity at work.

adm Indicia provides a safe and healthy workplace for our employees globally and adhere to applicable local and international occupational health and safety laws and regulations. This includes taking proactive steps to prevent workplace injuries and illnesses, ensuring access to appropriate training, equipment, and support, and promoting a culture of safety through open communication.

We strive to provide our employees with regular training across this important area. Every year, and as part of our annual compliance training, 100% of our staff are required to complete learning across global health and safety. Attendance is regularly monitored and reported on.

3. Freedom of Association & Collective Bargaining

We respect our employees' right to choose to join or not join a trade union, or to have recognized employee representation without fear of discrimination, retaliation, or harassment.

We are committed to engaging in constructive dialogue with employee representatives and to recognizing lawful labor organizations in accordance with applicable laws. adm Indicia upholds the freedom of association by ensuring non-interference, enabling worker representation, maintaining effective grievance mechanisms, and engaging with employee representatives.

We respect and support workers' rights to participate in social dialogue and collective engagement on matters concerning the workplace.

4. Working hours, Wages & Benefits

adm Indicia abide by all laws and regulations governing pay practices, working hours, holidays, and the proper classification of employment according to job level and employment status.

We uphold fair wages that meet or exceed legal and industry standards. adm Certified as a Living Wage employer by the Fair Wage Network (FWN) initially in 2023, ensuring that all our global employees are paid a decent and recognized salary for the work that they do. Re-Certification was also achieved in 2024.

Following the integration of adm and Indicia in 2025, adm Indicia is committed to extend this commitment also across the combined business, ensuring that 100% of our employees globally are paid at or above recognised living wage benchmarks through 2028.

5. Prohibition of Child Labour and All Forms of Forced or Compulsory Labor

Our goal is to foster a culture of transparency and accountability, where every individual can work freely and safely.

All employment with adm Indicia is voluntary. We do not use child labour or any form of forced or compulsory labour in any of our operations or facilities. We do not tolerate any form of unacceptable treatment of workers, including but not limited to the exploitation of children, physical punishment or abuse, or involuntary servitude.

We fully respect all applicable laws establishing a minimum age for employment, to help support the effective abolition of child labour worldwide.

We hold a **zero tolerance** to, and strictly prohibit forced or compulsory labour, debt bondage, human trafficking, and child labour across all operations and supply chains.

Our progress across these critical issues is supported by continued monitoring of preventative actions including:

- Number of employees having completed our compulsory compliance training module on 'Preventing human trafficking' (target:100% of employees annually and until 2028).
- Number of internal and/or external reported whistleblowing incidents related to a matter concerning child labour, forced/compulsory labour, and human trafficking. (target: 0 each year)
- Number and nature of reported audit non-compliances annually concerning this area, including number of Corrective Action Plans initiated and resolved.

6. Supply Chain Management

Safeguarding human rights is a vital component of responsible sourcing. Over time, we have gradually improved our human rights due diligence framework by embedding a range of

targeted measures to more effectively identify, prevent and remedy actual and potential human rights risks.

Our work includes upholding respect and consideration to all who play a role in our business. To achieve this, we recognize the need to work together with our suppliers and business partners. Our goal is to encourage improvements that support individuals in our value chains to enjoy their fundamental human rights. We support this through our many projects which aim to build resilience, empower workers, and promote fair and safe labour conditions.

We place particular emphasis on addressing those rights that are most at risk of severe, adverse impact through our activities or business relationships, which we identify as our salient human rights issues. Addressing and mitigating these salient human rights risks is a critical element of this process.

adm Indicia has several procedures in place designed with the specific purpose to monitor and manage risk to human rights. Measures across our global value chain and operations are based on a multifaceted approach that ensures each issue is addressed appropriately, while enabling us to monitor critical areas as needed. Where we may cause or contribute to harm, we facilitate or provide effective remedy.

We conduct ongoing human rights due diligence activities across our supply chain, including risk identification, regular salience assessments and gap analyses, implementation of mitigation measures, corrective action plans (CAPs) and remediation, supply chain mapping, monitoring and reporting through defined key performance indicators (KPIs), ongoing stakeholder engagement and communication.

We integrate human rights criteria into supplier onboarding, third-party social audits, and our expectations towards continuous improvement.

Requirements to all our suppliers on how they are expected to manage human rights are included in our contractual agreements within our Supplier Code of Conduct. All suppliers must sign the Code as well as maintain compliant social audits.

We commit to implementing human rights due diligence across our supply chain, with defined targets for supplier assessment, corrective action, capacity building, and monitoring of potential adverse human rights impacts.

To support this commitment, adm Indicia has established measurable targets and tracking mechanisms, including but not exclusively covering:

- **Worker Voice Engagement:** Conduct a minimum of 30 anonymous worker voice surveys each year until 2028, hosted by our third-party provider Ulula, across higher-risk operating regions.
- **Responsible Sourcing (social audit):** 95% of the spend we manage to be placed with suppliers with valid social audits by 2030 (SMETA 4P or its equivalent), aligned with our Assure standards on continued responsible sourcing activities

- **Inclusive Procurement:** Work towards at least 20% of our annual spend to be placed with smaller business and those owned by diverse, underrepresented groups by 2030.
- **Living Wage Commitment:** Our long-term ambition is for 50% of our procurement spend to be directed to our critical suppliers that provide a living wage to their workers by 2030.
- Maintain **zero tolerance** for child labour, forced labour, and human trafficking across the supply chain

7. Grievance Mechanism & Whistleblowing

adm Indicia upholds confidential, accessible, whistleblowing and grievance channels for its employees, and suppliers' workforce, without fear of retaliation. Reports are reviewed and addressed promptly to ensure fair resolution.

Our Whistleblowing policy outlines the internal process available to adm Indicia employees to manage any incident reported to us through our reporting channels. The adm Indicia Whistleblowing policy function includes a dedicated global ethics helpline available in multiple languages, providing an option for anonymous reporting. This channel, operated by a third-party provider, has been extended in 2025 to include all our strategic suppliers.

Through this helpline we can increasingly monitor, address and remedy any work-related concerns workers may experience including those that could involve salient issues. Our longer-term objective is for 100% of our ASL suppliers to have access to the helpline by 2028.

8. Training and awareness

As adm Indicia continues to grow and expand our operations, it is essential that all our employees are aware of, and comply with, our global policies and procedures.

We encourage our employees to take responsibility for the protection of human rights by providing training and workshops and effectively communicating our principles and expectations. We provide mandatory human rights training for employees and targeted training for suppliers. By building awareness, fostering a culture of accountability, and equipping our teams with the tools and learning that they need, we can collectively contribute to meaningful progress.

adm Indicia recognises that training and development opportunities are essential overall to enabling employees to build their capabilities and achieve greater fulfilment in their work. To support our workforce and promote continuous learning, we offer a range of training programmes, including skills development, professional and leadership training, and role-

specific learning aligned with business needs as part of our Global Learning and Thrive Programs.

- Number of employees trained on topics specifically related to CSR (1% increase annually until 2028).

9. Digital Security and Data Privacy

adm Indicia is committed to respecting and protecting the digital rights, privacy, and personal information of its employees, customers, business partners, and other stakeholders. We strive to safeguard confidential and personal data, maintain secure systems, and promote responsible use of technology in accordance with applicable laws, and regulations.

We prohibit unauthorized access, misuse, disclosure, or exploitation of data and is committed to maintaining a safe and secure digital environment for all.

Looking Forward

In a complex, global operating context, we understand our responsibility and the importance of making sure the protection of human rights is embedded in our strategic and company decisions.

adm Indicia works steadily to improve our internal procedures to progress on our risk management and compliance frameworks, in own operations as well as across our supplier base.

People around us and their welfare is critical to our business. Only through meaningful stakeholder engagement are we able to fully understand any issues they may be facing. We maintain ongoing dialogue with a wide range of both internal and external stakeholders, to identify current and emerging human rights risks, understand their expectations and needs, and refine our focus areas.

Our human rights journey has evolved over time and will continue to do so as we progress. adm Indicia's achievements to date underscore our steadfast commitment to ensure workers connected to our business are empowered to exercise their fundamental freedoms, experience no harm, and are freed to engage with our business in an environment that safeguards their human rights.

Our documents in support of this policy:

DEI Policy
Sustainable Procurement Policy
Whistleblowing Policy
Modern Slavery Statement

Review

We recognize the challenging journey ahead in achieving all of the above, but we are resolute in the progress we have articulated. The adm Indicia Sustainability Team, Policy Committee and the Steering Committee will review this Human Rights Policy periodically. Additional review and amendments can be arranged if there is a request to settle urgent matters.

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