

## Archer-Daniels Midland Co (ADM)

### Vote Yes: Item #5 – Disclosure of Pesticide Use Data in Regenerative Agriculture Program

Annual Meeting: May 7, 2026

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#### THE RESOLUTION

Shareholders request that ADM issue a report, at reasonable expense and omitting proprietary information, disclosing if and how the Company can incorporate pesticide use data reporting in its regenerative agriculture program disclosures.

#### SUMMARY

This Proposal asks ADM to disclose if and how it can report pesticide use data for its regenerative agriculture program. Regenerative agriculture depends on robust soil biology. Thriving microorganisms in a healthy soil ecosystem help retain water and enhance water filtration; prevent topsoil loss; break down organic matter; and facilitate nutrient cycling and nutrient uptake into plants. Healthy soils also increase farm resiliency in the face of climate-related droughts and floods and increase soil's ability to sequester carbon.<sup>1</sup>

The Boston Consulting Group estimates that farmers adopting regenerative practices can see between 70% to 120% higher profitability over time, above peers farming conventionally, due to increased resiliency.<sup>2</sup> Such gains also include reduced input costs from significant pesticide and fertilizer use. By promoting the adoption of regenerative agricultural practices in its supply chain, ADM can help stabilize farmers' incomes and its own resiliency.

In contrast, pesticides kill or significantly suppress soil microorganisms, thereby undermining soil health and farm resiliency and creating reliance on large amounts of costly fertilizer. In addition to harming soil ecosystems, pesticides also create negative health impacts on farmworkers and fenceline communities, increase air and water pollution, and harm biodiversity. Reducing pesticide use is essential for regenerative agriculture to achieve its intended outcomes.

While certain aspects of regenerative agriculture, such as no- or reduced tillage or crop rotation, can help retain topsoil and reduce crop disease, these gains are significantly undermined when pesticide use continues. Without reducing pesticide inputs, soil microbial activity cannot be restored, limiting outcomes such as carbon sequestration, water retention, and crop resilience.

Currently, ADM fails to report pesticide use and reduction data for its regenerative agriculture program. As a consequence, investors have insufficient information to understand the success of its program and whether ADM adequately mitigates risks related to pesticide use in the Company's regenerative supply

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<sup>1</sup> <https://www.sciencedaily.com/releases/2023/02/230208125121.htm>

<sup>2</sup> <https://www.wbcd.org/resources/cultivating-farmer-prosperity/>



chains. ADM has fallen behind other peer food companies, including Lamb Weston, McCain Foods, and Conagra, which are measuring and/or publicly reporting pesticide reductions across their supply chains achieved through regenerative agriculture practices.

Tracking progress is necessary for investors and the Company to effectively manage risk. ADM's unwillingness to obtain and/or disclose pesticide use and reduction information achieved through its regenerative agriculture program leaves the Company vulnerable to greenwashing claims and reputational risk, unsatisfied customers seeking healthier foods, and failure to obtain the benefits of its regenerative agriculture program including farm resiliency, reduced environmental and health impacts, and increased profits.

## RATIONALE FOR A YES VOTE

- 1. ADM's pesticide reporting gap creates material financial and reputational risk for shareholders**
- 2. ADM lags peers in measuring and disclosing pesticide reduction within its regenerative agriculture program**
- 3. ADM's growth depends on winning verified-outcome contracts; pesticide disclosure is the missing credential**

## DISCUSSION

- 1. ADM's pesticide reporting gap creates material financial and reputational risk for shareholders**

Pesticide use creates converging financial and reputational risks for agricultural processors. At the farm level, the financial case for reducing pesticide use is well established. A peer-reviewed study in *Nature Plants* analyzing 946 commercial farms found that reducing pesticide use rarely decreases productivity or farm profitability — and in many cases improves both by reducing input costs.<sup>3</sup> The American Farmland Trust's soil health case studies found that farmers adopting regenerative practices reduced pesticide costs by \$3 to \$36 per acre per year and improved net income on the majority of participating farms.<sup>4</sup> The underlying science is also well established: a 2025 peer-reviewed study in the *Proceedings of the National Academy of Sciences* found that increasing pesticide diversity impairs soil microbial network complexity and disrupts the carbon, nitrogen, and phosphorus cycling functions on which crop yields depend.<sup>5</sup> When soil biology is chemically suppressed, regenerative agriculture cannot deliver the

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<sup>3</sup> Lechenet et al., "Reducing Pesticide Use While Preserving Crop Productivity and Profitability on Arable Farms," *Nature Plants* 3, 17008 (2017). Analysis of 946 non-organic commercial farms in France found that low pesticide use rarely decreases productivity and that more than 75% of farms could reduce pesticide use with no negative impact on profitability. Available at <https://www.nature.com/articles/nplants20178>

<sup>4</sup> American Farmland Trust, "Soil Health Case Study Findings." Case studies across 26 farms found that adoption of soil health practices reduced pesticide costs by \$3–\$36 per acre per year on participating row crop farms, and that 22 of 23 row crop farmers improved net income. Available at <https://farmland.org/soil-health-case-study-findings>

<sup>5</sup> Zhang et al., "Increasing Pesticide Diversity Impairs Soil Microbial Functions," *Proceedings of the National Academy of Sciences* (PNAS), January 2025. Study finds that higher pesticide diversity enriches specialist bacteria and reduces generalist communities, impairing carbon, nitrogen, phosphorus, and sulfur cycling. Available at <https://www.pnas.org/doi/10.1073/pnas.2419917122>



outcomes it promises — and the financial value of the program to ADM and its customers erodes accordingly.

Agricultural pesticides also create direct legal and reputational exposure. They cause long-term health harms including asthma, cancer, and birth defects, and result in acute poisoning of 25 million farmworkers annually.<sup>6</sup> Pesticides also harm pollinators critical to 35% of global crop production, a direct threat to ADM's agricultural supply chains.<sup>7</sup> Consumer pressure is intensifying these risks: the World Economic Forum reports that 65% of consumers want access to healthy and sustainable foods,<sup>8</sup> a market signal that food and agricultural companies ignore at competitive peril.

Greenwashing litigation risk in the food and agricultural sectors is rising sharply and is directly relevant to ADM to the extent the Company is making claims about the benefits of regenerative agriculture that are not occurring in practice. Tyson Foods, a food and agricultural supply chain company, settled a lawsuit in November 2025, agreeing to stop making climate claims not substantiated by the company's actual practices.<sup>9</sup> JBS also settled a similar suit in 2024.

ADM describes its regenerative agriculture program as "an outcome-based farming approach that protects and improves soil health, biodiversity, climate, and water resources" and commits in the same report to "delivering tangible outcomes."<sup>10</sup> This claim covers four distinct outcome categories. ADM's most recent Regenerative Agriculture Report — covering 2024, the year the program reached 5 million acres — discloses quantified outcomes for one category: carbon sequestration/greenhouse gas reduction,<sup>11</sup> which its corporate Strive 35 goal requires it to track. ADM reports no metrics for soil health, biodiversity, or water quality across any of its enrolled acres. A claim of improvement that specifies no starting point, no target, and no measurement methodology for three of its four stated outcome categories cannot be verified by regulators, customers, shareholders, or by ADM itself. This structural deficiency is precisely what state attorneys general and plaintiffs' counsel have targeted in recent greenwashing enforcement: not that companies lied about a specific number, but that they made broad improvement claims their own disclosures did not substantiate.

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<sup>6</sup> Rehner et al., "Pesticide Exposure and Health Effects," NCBI / Environmental Health Perspectives (2010). Documents approximately 25 million acute pesticide poisonings among agricultural workers annually worldwide. Available at <https://pmc.ncbi.nlm.nih.gov/articles/PMC2946087>

<sup>7</sup> USDA, "Importance of Pollinators" (2024): pollinators contribute to approximately one-third of the world's food supply. See also FAO, "Pollinators, Pollination and Food Production": estimates pollinators support 35% of global food production by volume. Available at <https://www.usda.gov/about-usda/general-information/initiatives-and-highlighted-programs/peoples-garden/importance-pollinators>

<sup>8</sup> World Economic Forum, "Consumer Power: How Shoppers Can Drive Net-Zero" (January 2023). Reports that 65% of consumers want access to healthy and sustainable food products, with demand accelerating among younger demographics. Available at <https://www.weforum.org/stories/2023/01/consumer-power-net-zero-food-producer-retailer-davos23/>

<sup>9</sup> Green Building Law Update, "Greenwashing Lawsuits Surge in 2025: Navigating the Expanding Risk" (November 2025). Discusses Tyson Foods' November 2025 settlement (agreeing to stop "net-zero" and "climate-smart beef" claims for five years) and the New York State Attorney General's 2024 \$1.1 million settlement with JBS over unsubstantiated net-zero pledges. Available at <https://www.greenbuildinglawupdate.com/2025/11/articles/greenwashing/greenwashing-lawsuits-surge-in-2025-navigating-the-expanding-risk/>

<sup>10</sup> ADM, "Regenerative Agriculture," ADM.com: <https://www.adm.com/en-us/sustainability/regenerative-agriculture/>

<sup>11</sup> ADM, 2025 Regenerative Agriculture Report (2024 outcomes), p. 4 (2024 Highlights) and p. 10 (North America section). [https://www.adm.com/globalassets/sustainability/2023-landing/2023-policies-and-reports/adm\\_regen-ag-report-2025\\_final.pdf](https://www.adm.com/globalassets/sustainability/2023-landing/2023-policies-and-reports/adm_regen-ag-report-2025_final.pdf)



The claim that its regenerative agriculture improves soil health cannot be verified without data — and the scientific record raises specific doubts about whether it can be true at scale without pesticide reduction. The peer-reviewed literature treats pesticide application and conservation tillage as independent variables with independent effects on soil biology. A 2023 study published in *Soil Biology and Biochemistry* found that while conservation tillage benefits soil health relative to conventional tillage, those benefits are undermined when tillage is coupled with pesticide seed treatments, which have direct toxic effects on soil fungal communities and alter microbial substrate function.<sup>12,13</sup> The longest-running field evidence comes from the Rodale Institute's 45-year Farming Systems Trial. After a decade of no-till, conventional plots showed no improvement in most soil health indicators over conventionally tilled plots; organic plots managed without synthetic pesticides showed 18 to 92% higher soil organic carbon, higher microbial biomass, and higher aggregate stability — despite more tillage.<sup>14</sup> The trial's authors concluded that the primary differentiator of soil health was not tillage practice but pesticide elimination.

ADM's enrolled acres are predominantly corn and soy crops, where 93% of no-till acreage typically uses synthetic herbicides. Therefore, a claim of improved soil health and biodiversity based on tillage practices, without pesticide reduction, raises significant questions.

## 2. ADM lags peers in measuring and disclosing pesticide reduction within its regenerative agriculture program

ADM has enrolled more than 5 million acres in its regenerative agriculture program.<sup>15</sup> But acreage enrolled is a measure of program reach, not program outcomes. Reporting how many acres are enrolled provides shareholders with no information about what is achieved on those acres in terms of soil health, pesticide reduction, biodiversity, or water quality. Competitors are already providing the next level of disclosure:

- **Lamb Weston** disclosed year-over-year active ingredient pesticide use in its 2024 sustainability report and has set a 2030 goal to reduce active ingredient pesticide use by 30%.<sup>16</sup>
- **Conagra Brands** disclosed in its 2023 Citizenship Report that regenerative agriculture practices within its supply chain avoided the application of 145,000 gallons.<sup>17</sup>
- **McCain Foods** evaluates pesticide impacts within its Regenerative Agriculture Framework using an indicator for “reduced toxicity of pesticides,” under which crop protection products are selected to reduce environmental, human, and consumer impact.<sup>18</sup>

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<sup>12</sup> Mackay, J.E., Bernhardt, L.T., Smith, R.G., and Ernakovich, J.G. "Tillage and Pesticide Seed Treatments Have Distinct Effects on Soil Microbial Diversity and Function." *Soil Biology and Biochemistry*, Vol. 176 (2023).

<https://doi.org/10.1016/j.soilbio.2022.108860>

<sup>13</sup> Ni, B., Xiao, L., Lin, D., et al. "Increasing Pesticide Diversity Impairs Soil Microbial Functions." *PNAS*, Vol. 122, No. 2 (January 14, 2025). <https://doi.org/10.1073/pnas.2419917122>. Higher pesticide diversity impairs microbial network complexity and disrupts certain cycling functions.

<sup>14</sup> Andrew Smith (Chief Scientific Officer), "New Report Identifies 'Toxic' Impact of No-Till Agriculture, Inaccurately Referred to as 'Regenerative.'" Rodale Institute, May 5, 2025. <https://rodaleinstitute.org/blog/new-report-identifies-toxic-impact-of-no-till-agriculture-inaccurately-referred-to-as-regenerative/>

<sup>15</sup> <https://www.adm.com/en-us/news/news-releases/2025/9/adm-exceeds-5m-regenerative-agriculture-acreage-goal/>

<sup>16</sup> [https://media.potatopro.com/2024-sustainability-report.pdf?utm\\_source](https://media.potatopro.com/2024-sustainability-report.pdf?utm_source)

<sup>17</sup> [https://www.conagrabrands.com/citizenship-reports/conagra-brands-citizenship-report-2023?utm\\_source](https://www.conagrabrands.com/citizenship-reports/conagra-brands-citizenship-report-2023?utm_source)

<sup>18</sup> [https://www.mccain.com/media/4594/mccain\\_regenag\\_framework\\_2024.pdf?utm\\_source](https://www.mccain.com/media/4594/mccain_regenag_framework_2024.pdf?utm_source)



ADM appears to be measuring pesticide use on at least some of its enrolled farms. Its press release on the Mars, Inc. and Royal Canin regenerative agriculture agreements states that participating farmers implement practices including “efficient herbicide/pesticide use,” with outcomes measured and verified by ADM’s partner Gradable using third-party sustainability measurement.<sup>19</sup> ADM’s 2025 Regenerative Agriculture Report further confirms that it tracks pesticide as an emissions category and that enrolled farmers provide “data needed to quantify key metrics.”<sup>20</sup> If the data exists and the measurement infrastructure is operational, ADM can aggregate and publicly disclose the results. The Proposal asks the Company to explain, at minimum, if and how it could do so.

This disclosure gap creates investor-relevant risks. ADM’s competitive disadvantage is growing. Mordor Intelligence documents that major buyers now embed “regenerative specifications in raw-material contracts” and Nestlé has committed \$1.49 billion specifically to source from farms with “verifiable soil-health outcomes.”<sup>21</sup> Nestlé’s DiGiorno wheat initiative demonstrates how these requirements are being operationalized: the company is working through primary suppliers, including ADM, to implement regenerative practices to improve soil health and meet climate goals.<sup>22</sup> Nestlé explicitly identifies reduced pesticide use as part of these regenerative practices. Nestlé’s Responsible Sourcing Standard further embeds these expectations into supplier contracts and allows for verification of supplier performance across agricultural supply chains.<sup>23</sup> Nestlé’s own agriculture framework identifies pesticide use as a material environmental risk, including impacts on water quality and biodiversity, reinforcing the importance of managing and reducing chemical inputs.<sup>24</sup> Suppliers in these value chains are expected to demonstrate measurable outcomes. The commercial consequences of this gap are addressed in Discussion 3.

### **3. ADM's growth depends on winning verified-outcome contracts; pesticide disclosure is the missing credential**

The Company has built a portfolio of multi-year supply agreements with major global food brands around its regenerative agriculture program, including a 7.5-year strategic commercial agreement with PepsiCo targeting up to 2 million shared North American supply-chain acres, as well as agreements with Mars, Inc. and Smucker.<sup>25</sup> These companies have established regenerative agriculture programs that

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<sup>19</sup> <https://www.adm.com/en-us/news/adm-stories/partners-for-pets-adm-collaborates-with-mars-and-royal-canin-on-regenerative-agriculture/>

<sup>20</sup> [https://www.adm.com/globalassets/sustainability/2023-landing/2023-policies-and-reports/adm\\_regen-ag-report-2025\\_final.pdf](https://www.adm.com/globalassets/sustainability/2023-landing/2023-policies-and-reports/adm_regen-ag-report-2025_final.pdf)

<sup>21</sup> Mordor Intelligence, “Regenerative Agriculture Market Size & Forecast to 2030” (2025): market valued at \$9.2 billion in 2025, projected to reach \$18.3 billion by 2030 at 14.75% CAGR. Available at <https://www.mordorintelligence.com/industry-reports/regenerative-agriculture-market>

<sup>22</sup> Nestlé Advances Efforts to Source Key Ingredients Grown with Regenerative Agriculture Practices to Combat the Greenhouse Effect, July 12, 2023, <https://www.nestleusa.com/media/pressreleases/digiorno-regen-wheat?>

<sup>23</sup> Nestlé Responsible Sourcing Core Requirements, June 2025, <https://www.nestle.com/asset-library/documents/library/documents/suppliers/nestle-responsible-sourcing-standard-english.pdf>

<sup>24</sup> <https://www.nestle.com/sites/default/files/2022-07/nestle-agriculture-framework.pdf>

<sup>25</sup> PepsiCo, “Positive Agriculture,” [pepsico.com/en/esg-topics/agriculture](https://pepsico.com/en/esg-topics/agriculture) (program explicitly tracks five measurable outcome areas including soil health; CSO confirmed outcomes focus on “measurable improvements” including “soil health [soil organic matter, water-holding capacity, micro/macronutrients]”). See also PepsiCo Brazil pilot offering bonuses “tied to measurable reductions in agrochemical use,” <https://igrownews.com/pepsico-latest-news/>. For Mars, see Mars European partnerships press release (December 5, 2024), <https://www.mars.com/en-gb/news-and-stories/press-releases-statements/mars->



emphasize measurable and verifiable outcomes, including tracking farm-level practices and environmental impacts such as chemical input use and soil health. As a result, suppliers like ADM are increasingly expected to provide data demonstrating progress against these metrics. The global market for verified regenerative agricultural products is growing at a compound annual rate of over 13%, projected to reach \$17.7 billion by 2030.<sup>26</sup>

The Nestlé relationship makes the stakes concrete. Nestlé — one of ADM's named supply-chain partners — announced in July 2023 that it is sourcing regenerative wheat through ADM and Ardent Mills across more than 100,000 acres in Kansas, North Dakota, Indiana, and Missouri for its DiGiorno brand.<sup>27</sup> Nestlé's press release for that program explicitly names "reducing the use of pesticides" as one of the three required practices. ADM measured and publicly reported carbon sequestration outcomes from those farms. It has disclosed no pesticide data. ADM is therefore already operating inside a documented, named buyer relationship that requires pesticide reduction as a practice while publishing zero data to demonstrate it is meeting that requirement. This is not a future risk. It is a present one. Assuming, however, that ADM is collecting necessary data, it is not yet disclosing that data to support its own claimed outcomes.

ADM's shareholders have already absorbed a \$15 billion loss in market capitalization tied to a disclosure gap in the in the Company's nutrition segment, where financial performance was overstated without adequate investor visibility into underlying data.<sup>28</sup> The parallel here is not the accounting mechanics but the reporting of key information. When ADM makes public claims about a program central to its commercial strategy without sufficient supporting data, shareholders bear the risk.

## RESPONSE TO ADM BOARD OF DIRECTORS' STATEMENT IN OPPOSITION

The Board's statement in opposition to the Proposal is unpersuasive.

**"Requiring farmers to track pesticide use adds cost and complexity with no benefit to the farmer, and would jeopardize the continued progress of our regenerative agriculture program."**

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[announces-partnerships-supporting-regenerative](#) ("Mars will track the impact of the various projects through robust measurement, reporting, and verification systems to ensure transparency, focusing on enhancing soil health and reducing GHG emissions"); ADM press release on Mars/Royal Canin agreement confirms tracked practices explicitly include "efficient herbicide/pesticide use," <https://www.adm.com/en-us/news/adm-stories/partners-for-pets-adm-collaborates-with-mars-and-royal-canin-on-regenerative-agriculture/>. The J.M. Smucker Company agreement with ADM covers regenerative agriculture in its peanut supply chain but publicly available sources do not specify outcome verification requirements for chemical inputs. ADM, "ADM, Smucker Partnering to Bring Regenerative Agriculture to US Peanut Value Chain," ADM press release. The three-year agreement (2024-2026) covers 20,000 peanut acres annually and includes cover crops, reduced tillage, and responsible pesticide use. Available at <https://www.adm.com/en-us/news/adm-stories/adm-smucker-partnering-to-bring-regenerative-agriculture-to-us-peanut-value-chain/>

<sup>26</sup> [https://www.strategicmarketresearch.com/market-report/regenerative-agriculture-market?utm\\_source](https://www.strategicmarketresearch.com/market-report/regenerative-agriculture-market?utm_source)

<sup>27</sup> Nestlé U.S. press release, July 12, 2023: <https://www.nestleusa.com/media/pressreleases/digiorno-regen-wheat>

<sup>28</sup> Reuters, "ADM CEO's 2024 Compensation Dips Amid Accounting Issues, Job Cuts" (March 25, 2025): "ADM shares are down 32% since news of the accounting issues broke in January 2024, sending its market cap plunging to around \$22 billion from nearly \$37 billion." Available at <https://www.investing.com/news/stock-market-news/adm-ceo-pay-dips-in-2024-as-accounting-issues-job-cuts-hang-over-company-3948181> See also Trellis, "How PepsiCo and ADM Work with Farmers to Cut Agricultural Emissions" (Feb. 2024), available at <https://trellis.net/article/how-pepsico-and-adm-work-farmers-cut-agricultural-emissions/> (ADM-PepsiCo 7.5-year contract covering 2 million acres; outcome-based measurement described as program standard).



ADM is already tracking pesticide use on what appears to be a significant portion of its enrolled farms. Its own published press release on the Mars, Inc. agreements states that practices including “efficient herbicide/pesticide use” are measured and verified using the Gradable platform.<sup>29</sup> Furthermore, farmers enrolled in the program are required by federal law to keep records on Restricted Use Pesticides.<sup>30</sup> The Proposal does not ask ADM to build new measurement infrastructure. It asks ADM to disclose, in aggregate, data the Company is already collecting. The concern the Board raises has already been resolved by ADM’s own program design.

**“Our regenerative agriculture program encompasses many outcomes beyond pesticide reduction. Focusing solely on pesticide tracking would limit the program’s overall impact.”**

This Proposal does not ask ADM to reduce its program to a single metric. It asks ADM to incorporate pesticide use data into existing disclosures given the fundamental impact of pesticides to the various benefits claimed by ADM. Pesticide reduction is not one outcome among many; it is the biological prerequisite for the outcomes ADM claims. Soil health, biodiversity, carbon sequestration, and water quality all depend on living soil microbial communities, which pesticides suppress.<sup>31</sup> ADM’s program definition lists “responsibly managing inputs, including nutrients and pesticides” as one of five foundational principles,<sup>32</sup> without defining what “responsibly managing” means. Disclosing pesticide data is not a distraction from the program’s goals. It is direct evidence of whether those goals are being met.

**“We already provide significant disclosure on our regenerative agriculture program.”**

ADM’s current disclosures report acres enrolled and carbon sequestration estimates. Shareholders cannot determine from ADM’s published reports whether enrolled acres are achieving improved soil health, reduced pesticide loading, or measurable biodiversity gains. Pesticide reporting is not a high bar. Lamb Weston discloses year-over-year active ingredient pesticide use with a 2030 reduction target;<sup>33</sup> Conagra reports specific volumes of pesticides avoided,<sup>34</sup> and McCain Foods applies a toxicity

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<sup>29</sup> ADM “Partners for Pets” press release documenting the Mars Petcare/Royal Canin agreement and listing Nestlé, Ooni, and Carlsberg as downstream partners, with the ADM 2025 Regenerative Agriculture Report as supporting source.

<https://www.adm.com/en-us/news/adm-stories/partners-for-pets-adm-collaborates-with-mars-and-royal-canin-on-regenerative-agriculture/>

<sup>30</sup> USDA Agricultural Marketing Service, “Pesticide Recordkeeping Program: Restricted Use Pesticide Requirements.” Federal law requires certified pesticide applicators to maintain records of all Restricted Use Pesticide applications for two years. Available at <https://www.ams.usda.gov/rules-regulations/pesticide-records>

<sup>31</sup> Zhang et al., “Increasing Pesticide Diversity Impairs Soil Microbial Functions,” Proceedings of the National Academy of Sciences (PNAS), January 2025. Study finds that higher pesticide diversity enriches specialist bacteria and reduces generalist communities, impairing carbon, nitrogen, phosphorus, and sulfur cycling. Available at <https://www.pnas.org/doi/10.1073/pnas.2419917122>

<sup>32</sup> <https://www.adm.com/globalassets/sustainability/sustainability-reports/pdfs/adm-2024-regenerative-agriculture-report-1-compressed2.pdf>

<sup>33</sup> Lamb Weston Holdings, Global Sustainability Report (Fiscal Year 2024), disclosing year-over-year active ingredient pesticide use and the 2030 goal to reduce active ingredient pesticide use by 30%. <https://media.potatopro.com/2024-sustainability-report.pdf>

<sup>34</sup> Conagra Brands, 2023 Citizenship Report, p. 21, citing the specific disclosure that regenerative agriculture practices avoided 145,000 gallons of soil fumigant pesticides. <https://www.conagrabrands.com/citizenship-reports/conagra-brands-citizenship-report-2023>



assessment framework across its regenerative suppliers.<sup>35</sup> ADM provides none of this. The existence of some disclosure does not resolve the absence of the specific material disclosure this Proposal requests.

## CONCLUSION

**Vote “Yes” on this Shareholder Proposal #5 to Disclose the Success of ADM’s Regenerative Agriculture Program by Reporting Pesticide Use/Reduction Data.**

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*For questions, please contact Cailin Dendas, As You Sow, [cdendas@asyousow.org](mailto:cdendas@asyousow.org)*

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<sup>35</sup> McCain Foods, Regenerative Agriculture Framework (2024), with the specific claim about the "reduced toxicity of pesticides" indicator. [https://www.mccain.com/media/4594/mccain\\_regenag\\_framework\\_2024.pdf?utm\\_source](https://www.mccain.com/media/4594/mccain_regenag_framework_2024.pdf?utm_source)