

ACTI Code of Ethics

The Alfred C. Toepfer International Group (ACTI) is a global leader in the field of international trade in agricultural commodities. We strive towards conducting our activities in a manner that protects the environment, the health of our employees, our business partners and the public.

Our paramount task is the long-term safeguarding of ACTI's economic viability with the goal of attaining adequate continued company development. In the long term, this will be the sole guarantor to secure jobs with ACTI.

Our employees are our most valuable asset. Integrity characterizes the manner employees deal with one another as well as with our business partners and with the public. It is not merely tradition but also conviction that leads us to conduct our business fairly and honestly.

ACTI's image in the public eye is essentially characterized by the appearance, actions and conduct of each one of us. Each of us shares the responsibility to ensure we, as an enterprise, meet our social responsibilities.

ACTI's Code of Ethics forms the basis of our activities. These globally binding rules are applicable to every one of our fellow employees.

A. Basic Rules of Conduct

Observance of the law and the legal system is ACTI's No. 1 priority. Each employee¹ must observe the provisions of the legal system applicable to his location. Violation and/or infringement of the laws will not be tolerated.

ACTI's reputation with our business partners and in the public eye is essentially characterized by the conduct of each one of us. Inappropriate conduct by just a single employee may substantially damage the company. Each individual must, therefore, fulfil his responsibilities with these aims in mind.

We respect personal dignity, a person's private sphere and the personal rights of each individual. Where men and women of different nationalities, cultures, religious beliefs and race collaborate, ACTI tolerates neither discrimination nor sexual or other personal molestation or insult. We evaluate job applicants and employees by their professional skills and achievements. We will not employ legally underage workers or forced labour.

We will not knowingly doing business with companies or suppliers who use abusive labour practices.

Our conduct is characterized by the highest form of loyalty towards colleagues and the company. ACTI employees distinguish themselves through exemplary personal conduct, performance and social competency.

We are open and sincere; we accept our responsibility within the sphere of company-internal collaboration as well as in our dealings with external partners. We promise only what we are able to delivery.

B. Conduct towards Business Partners and Third Parties

The actions of ACTI employees are governed by the terms of each employee's employment contract as well as by ACTI's own "*Good Commercial Principles*".

¹ Hereinafter used as a non-gender specific term; it is applicable to both female and male employees. The term "employees" includes management personnel.

Moreover, each employee is obliged to adhere to the rules that govern fair trade and competition. Employees are prohibited from discussing prices and/or quantities with competitors. Neither are they permitted to exert influence on ACTI customers with respect to the structuring of their onward pricing. Prohibited are also in particular agreements with competitors in writing or orally regarding prices in (public) tenders, the allocation of customers or sales territories, or restricting competition. When transacting business with a competitor to serve the Company's legitimate commercial needs or objectives, agreements with that competitor on the specific terms of a transaction are necessary and acceptable.

In the context of his employment with ACTI, no employee is allowed to offer or extend to anyone any direct or indirect advantages. Gifts for business partners must be selected judiciously to avoid any appearance of impropriety and incorrectness.

Exerting influence over the actions of civil servants and persons representing government agencies, political office-holders or parties, or other legal entities must remain within the boundaries set by the applicable legal provisions. Correspondingly, this excludes automatically all actions that offer such persons or political entities monetary reward or other important advantages.

Employees are prohibited from using their employment with ACTI to demand, accept or (allow to) be promised benefits of any kind. The foregoing excludes occasional gifts of minor value.

Any invitations extended by business partners may be accepted only if the occasion and extent of such invitation are appropriate.

It is important for ACTI that employees shall not be trapped in conflicts of interest or loyalty in the discharge of their duties. Any employee accepting a part-time job requires prior approval in writing by Human Resources. Such approval of part-time employment may be denied if the part-time work interferes with the employee's full-time job performance, if it contradicts the employee's obligations within ACTI or if there is the danger of a conflict of interest.

C. Treatment of Company Property

The use of equipment and installations in offices (e.g. telephone, copy machine, PC including the Internet and/or Intranet) is reserved for company business only. Applicable details and exceptions concerning limited personal use are included in the employment contract and in supplementary company agreements.

ACTI must protect intellectual property of itself and others. All employees will from time to time come in contact with matters that are subject to protection of intellectual property. The foregoing includes the copyright on software programs used by ACTI (more relevant details are included in a corresponding company agreement). All employees must observe the company's restrictions concerning the utilization of items that are protected by intellectual property rights.

D. Dealing with Information

To enjoy open and effective collaboration accurate and truthful reporting is essential. The foregoing applies equally to conduct between colleagues and business partners as well as with all public offices and agencies.

All transactions and business information must be recorded accurately to allow the preparation of accurate financial statements and internal controls shall ensure financial information is reported to Management in a timely and accurate manner.

Company-internal matters that are not intended for publication must be kept confidential and not disclosed to outsiders. The foregoing includes, for example, details about ACTI's organizational structure or figures from the internal reporting system.

It is essential to safeguard confidential information from reaching the public domain accidentally and to prevent strangers from overhearing business conversations (e.g. discussions in planes or restaurants).

The release of information to the press and to other media is strictly reserved for the Chairman of the Management Board or to persons explicitly authorized by him.

The obligation to maintain secrecy about business matters extends beyond the termination of a person's employment.

Personal information may be gathered, processed or utilized only to the extent such is required to satisfy defined, unequivocal and justified purposes.

ACTI employees are authorized to trade in the parent corporation's (ADM) stock or in securities of other companies only if they do not have insider information. Insider information is considered to be all non-publicly known information that is apt to influence an investor to acquire, sell or retain certain securities.

E. Environmental, Health, Safety/Security

ACTI considers the protection and the preservation of the environment a very high priority. Each employee is to strive at his workplace towards meeting this obligation.

ACTI is fully aware of its responsibility for a high standard of safety concerning food- and feedstuffs. For this reason, it is imperative that all employees observe at all times the quality management and quality assurance systems put in place by ACTI. Imminent or detected quality deficiencies must be reported immediately to the employee's supervisor. All measures necessary to prevent imminent damage to man, animal or the environment must be implemented immediately.

ACTI makes every effort to provide a place to work for all employees that is safe and secure and not detrimental to a person's health. The working environment must meet requirements for the preservation of good health.

All ACTI employees are required to contribute towards safety in the workplace. Accepting responsibility towards the safety of colleagues offers the best possible precaution to avoid the danger of accidents.

All employees must report any accidents or dangers in offices or other company facilities immediately to the responsible safety officer appointed or his supervisor.



F. ACTI and the ACTI Shareholders

The majority shareholder in ACTI, Archer Daniels Midland Company (ADM) is listed on the New York Stock Exchange and has issued its own "*Code of Conduct*". All ACTI employees will be given this Code together with the ACTI Code of Ethics for their information and compliance.

G. Complaints and Remedies

Any employee may lodge a personal complaint or indicate circumstances that point to the violation of the ACTI Code of Ethics. Such complaint is to be submitted to the employee's supervisor, the human resources manager or a company-internal workers' representative. Moreover, every employee is free to approach Management directly in such matters. Such matters will be thoroughly investigated and to the extent appropriate or required, appropriate measures initiated. All such matters will be treated in confidence, being disclosed only to persons with a need to know in order to adequately respond to the matter. Reprisal actions, in whatever form, will not be tolerated.

Employees are encouraged to take full advantage of available internal opportunities for conciliation.
