

Food Safety Modernization Act

Corbion is the global market leader in lactic acid and its derivatives, and a leading supplier of emulsifiers, functional enzyme blends, minerals, vitamins, and algae ingredients. Food safety is of utmost importance for Corbion. It is at the core of everything we do and fundamental to our success.

To ensure that we continually provide our customers with safe, quality products, Corbion has monitored the final rules of the United States Food and Drug Administration's (FDA) Food Safety Modernization Act (FSMA). Corbion facilities have conducted risk-based hazard assessments and incorporated processes into food safety plans to ensure food safety and food security programs meet FSMA requirements. Below are some of the key aspects of our FSMA compliance programs:

- **Preventive Controls – Food Safety Program:** Corbion has comprehensive, prevention-based controls in place to prevent or minimize the likelihood of acts intended to cause large-scale public harm. A fully functional food safety program is in place utilizing the Codex HACCP principles. Each facility has at least one trained PCQI team leader and a cross-functional food safety team. Physical, biological, chemical and radiological hazards for each raw material or family of raw materials are evaluated, additionally, each processing step is assessed for the introduction of potential hazards. The plan is examined annually; including review of any changes in raw materials, processes or scientific developments; and is audited on a routine basis.

Corbion manufactures and sells food solutions that may be derived from agriculture-based or mined raw materials (e.g. grains, seeds, spices) which may contain inherent pathogenic microorganisms. Biological risks associated with these materials cannot always be controlled or mitigated, and therefore Corbion products are not intended for direct consumption without further processing. Consequently, the Corbion products are not defined as RTE (ready-to-eat) (21CFR117.3 – FDA) nor intended for direct human consumption without further processing. These risks should be assessed as part of your FSMA food safety risk analysis for the final process and product.

- **Supply Chain Controls and Import Food Safety (FSVP):** Corbion conducts continuous evaluation of supplier performance and compliance. In addition, a comprehensive raw material risk evaluation is maintained, which includes a review for economically motivated adulteration. Transparency within the supply chain contributes to identifying risks and subsequently to minimize risks. Corbion has a procedure in place to perform risk-based assessments to verify that food imported into the United States has been produced in a manner that meets applicable food safety standards. We value our partnership with our suppliers, as well as holding them accountable for the safety and quality of the ingredients they supply. Documents provided to Corbion by our suppliers are considered confidential information, and Corbion has a policy not to share these supplier documents with outside parties.

- **Inspection and Compliance:** Corbion facilities receive third party audits to confirm our systems meet the Global Food Safety Initiative (GFSI) expectations. Additionally, a food defense program clearly defines measures in place to prevent intentional contamination, including but limited to: pre-employment background checks and limited access to facilities with card readers.

- **Response:** Corbion has an effective recall policy and recall procedures in place; verification of the policy and procedure are done with annual mock exercises. Corbion is also aware of the requirement to report when there is reasonable probability that the use of an article of food will cause serious adverse health consequences or death to humans or animals. Therefore, Corbion maintains FDA registration for all facilities. Last, we recognize the importance of strengthening existing collaboration among all food safety agencies to achieve FSMA public health goals and maintains sound relationships with regulators.

For questions, please contact customercare@corbion.com or 800-669-4092.

Janel Keep - Sr. Manager of Quality Assurance