



## **ADM's Environmental Programs**

Archer Daniels Midland Company (ADM) has established an environmental mission statement and principles addressing environmental protection. That statement sets forth ADM's commitment to the protection of human health and the environment and the environmental principles constitute a guide to the implementation of that commitment. In furtherance of that commitment ADM has:

1. Established an Environmental group, which is a part of the corporate Office of Compliance and Ethics (OCE), that provides assistance, guidance and training on environmental matters to all of ADM's facilities and other company environmental professionals,
2. placed a sizable number of employees who are devoted to the oversight of environmental matters at either individual facilities or groups of facilities, and
3. developed internal environmental audit teams within the OCE Environmental group which are expected to audit all major ADM facilities and representative smaller facilities on a periodic basis for compliance with the full range of federal, state and local environmental laws.



## **Environmental Mission Statement**

*ADM has established a global business based on the land's ability to grow the raw materials it uses. Naturally, the Company strives to act in ways that protect and enhance this ability over the long term. ADM's success is dependent upon a sustainable future, and ADM's worldwide presence has given it a unique perspective on what it takes to sustain a growing population. The constant effort to feed more and more people must be balanced by equal efforts to protect the land, water and air. ADM is committed to the protection of human health and the environment in all areas where it conducts operations. Implementation of this commitment is a primary management objective and the responsibility of every employee.*

## **Environmental Principles**

- To recognize environmental stewardship as among the highest corporate priorities and as a key determinant to sustainable development; to establish principles, programs and practices intended to ensure that operations are conducted in an environmentally sound manner and that applicable laws and regulations are followed.
- To educate, train and motivate employees to conduct their activities in an environmentally responsible manner and to communicate and reinforce accountability for environmental stewardship throughout the Company.
- To develop, design and operate facilities and to conduct activities taking into consideration the efficient use of energy and materials, the sustainable use of renewable resources, the minimization of adverse environmental impact and waste generation, and the safe and responsible management of wastes.
- To participate constructively in creating reasonable and cost-effective environmental laws, regulations and standards to safeguard the community, workplace and environment.
- To commit the necessary employee and management resources to support and implement these principles and to perform periodic evaluations to ensure that the environmental programs and practices established are consistent with them.



**Brent D. Flickinger, PhD**  
Vice President, Product Quality,  
Regulatory & Scientific Affairs  
4666 Faries Parkway  
Decatur, IL 62526  
T 217.451.2456 F 217.451.2248  
Brent.Flickinger@adm.com

February 20, 2015

The safety and security of our world's food and feed supply chain is of utmost importance to responsible participants in that chain. Archer-Daniels-Midland Company ("ADM") exists for the purpose of serving vital needs for food and energy. We connect the harvest to the home and transform crops into products that serve those needs. That purpose necessitates attending to the safety and security of our supply chain. ADM offers this letter to inform its business partners of its commitment to the safety and security of its processes and products and to compliance with regulatory requirements designed to protect the world's food supply.

ADM is continually reviewing and improving its food safety systems and procedures, including its good manufacturing practices and implementation of programs such as hazard analysis and critical control point (HACCP). ADM regularly evaluates its facilities, processes and procedures to assess the risk of contamination of its products. A variety of safeguards and security concepts are utilized to reduce that risk. With respect to ADM's delivery network, we track rolling stock and barges and have secure areas for storage of fleets where ADM products are being held. Bulk containers for food service are inspected prior to loading and procedures for the sealing of certain empty bulk containers are in place to reduce the possibility of contamination of a container, such as a trailer, railcar or barge, while being returned for the next load. Procedures for sealing loaded containers help ensure that all openings are properly sealed and those seals are tracked to maintain integrity of the vessel to its destination.

Considering risks of unexpected events, such as global terrorism, natural disasters or global pandemic outbreaks, ADM recognizes the importance of business continuity and supply chain resilience planning. ADM maintains a Crisis Leadership Plan and has engaged in, and is committed to, initiatives to ensure a safe and stable supply of products to our customers. Examples of these efforts include ADM's active participation in the U.S. Department of Homeland Security's Customs-Trade Partnership Against Terrorism Program, an international supply chain security program, and our Pandemic Planning Task Force, a strategic planning group focused on the unique safety, security and business continuity concerns presented by the potential of a pandemic disease.

With respect to ADM's information technology, proper recovery procedures are in place to allow ADM's commercial activities to resume within a reasonable period of time in the event of a disaster. These off site data center procedures have been reviewed, enhanced and tested to ensure that information relating to the business of ADM and its business partners is protected. Established disaster recovery procedures will allow ADM to continue operations, including supplying and servicing its customers, with minimal interruptions.

The U.S. Public Health Security and Bioterrorism Preparedness Response Act of 2002 requires registration with the U.S. Food and Drug Administration ("FDA") of facilities that manufacture, process, pack, or hold food for human or animal consumption in the United States. Additionally, the Food Safety Modernization Act requires re-registration by December 31, 2012 and biennial thereafter. All covered ADM facilities are registered and ADM has procedures to assure that those registrations are properly maintained. ADM also has procedures in place to assure we meet regulatory requirements regarding record keeping by registered facilities. The Global Trade Compliance section of ADM works with key managers, customs brokers and carriers involved in importing to implement systems and procedures for compliance with the prior notice regulations issued by the FDA and to develop a flow of information that continuously ensures a timely and efficient transfer of data.

ADM's Code of Conduct recognizes the Company's obligation to follow applicable laws and regulations in every aspect of its business. Specifically, it has been and will continue to be the intent of ADM to fully comply with the regulations issued pursuant to the Public Health Security and Bioterrorism Preparedness Response Act ("Bioterrorism Act").

Occasionally, we are asked to provide registration numbers issued to ADM facilities registered under the Bioterrorism Act. Due to security concerns and advice issued by the FDA, ADM will not disclose those registration numbers, which the FDA has declared as beyond the reach of Freedom of Information Act requests. Provision of those numbers would, in our estimation, be unwise because of concerns that it could allow access to information that should be treated as confidential. However, if a customer needs confirmation of registration of specific facilities, that confirmation can be provided upon request.

Sustainability is a priority for ADM as it serves vital needs globally. Supplying our customers and the markets they serve with responsibly grown agricultural products is an operational priority at ADM. Sustainably produced crops and products reduce the impact to the environment and benefit the communities where we live and work. ADM actively participates in internationally recognized certification schemes to support sustainable agriculture worldwide. For example, ADM participates in the Roundtable for Responsible Soy, the Roundtable on Sustainable Palm Oil, the International Standard for Carbon Certification and more to support the development and implementation of sustainable agriculture.

ADM is committed to supplying its customers with safe, high-quality products. If you need additional information regarding the issue of product and process protection at ADM, please feel free to communicate with your service or technical contact or with Product Quality, Regulatory and Scientific Affairs which can be reached by phone (217) 451- 4880, by email ([ProductQRSA@adm.com](mailto:ProductQRSA@adm.com)) or by facsimile (217) 451-2248.



Brent D. Flickinger, PhD  
Vice President,  
Product Quality, Regulatory & Scientific Affairs

BDF/ah



Archer Daniels Midland Company  
Corn Business Unit

ADM Technical Services | 4666 Faries Parkway, Decatur IL 62526  
P: 800.238.9026 | F: 217.451.2153 | CPTechService@adm.com

## Current Good Manufacturing Practices Statement

This is to certify that the products listed below are manufactured following Current Good Manufacturing Practices (cGMP) as defined in 21 CFR 117s.

### All Products

Alcohol-Beverage, Fuel and Industrial Grade	Maltodextrin (Clintose®)
Allulose (JustSweet™)	Potassium Citrate
Citric Acid Anhydrous	Propylene Glycol
Corn Syrup-Liquid and Solids	Resistant Maltodextrins (Fibersol®)
Corn Starch-Food and Industrial Grade	Sodium Citrate-Anhydrous and Dihydrate
Crystalline Dextrose (Clintose®)	Sorbitol-Liquid, Dry and Non-Crystallizing
Crystalline Fructose (CornSweet®)	Sucralose (VivaSweet™)
Glycerin	Sucrose*-Dry, Liquid and Invert
High Fructose Corn Syrups (CornSweet®)	Sweetener Blends
Liquid Citric Acid-Food and Industrial Grade (Citrosol®)	Xanthan Gum ( NovaXan™)
Maltitol Syrup	

*\*Sourced from sugarcane and sugar beets*

### Feed Products

Citristim	Golden Synergy™
Corn Germ Meal	Liquid Gold
Corn Gluten Feed	Liquid Lysine
Corn Gluten Meal	L-Lysine HCl
Distiller's Corn Oil	L-Threonine
Distiller's Dried Grains with Solubles	Modified Wet Distiller's Grains
Golden Gluten	Proplex DY, T, Y

If you have any questions, please do not hesitate to contact us.

ADM Technical Services

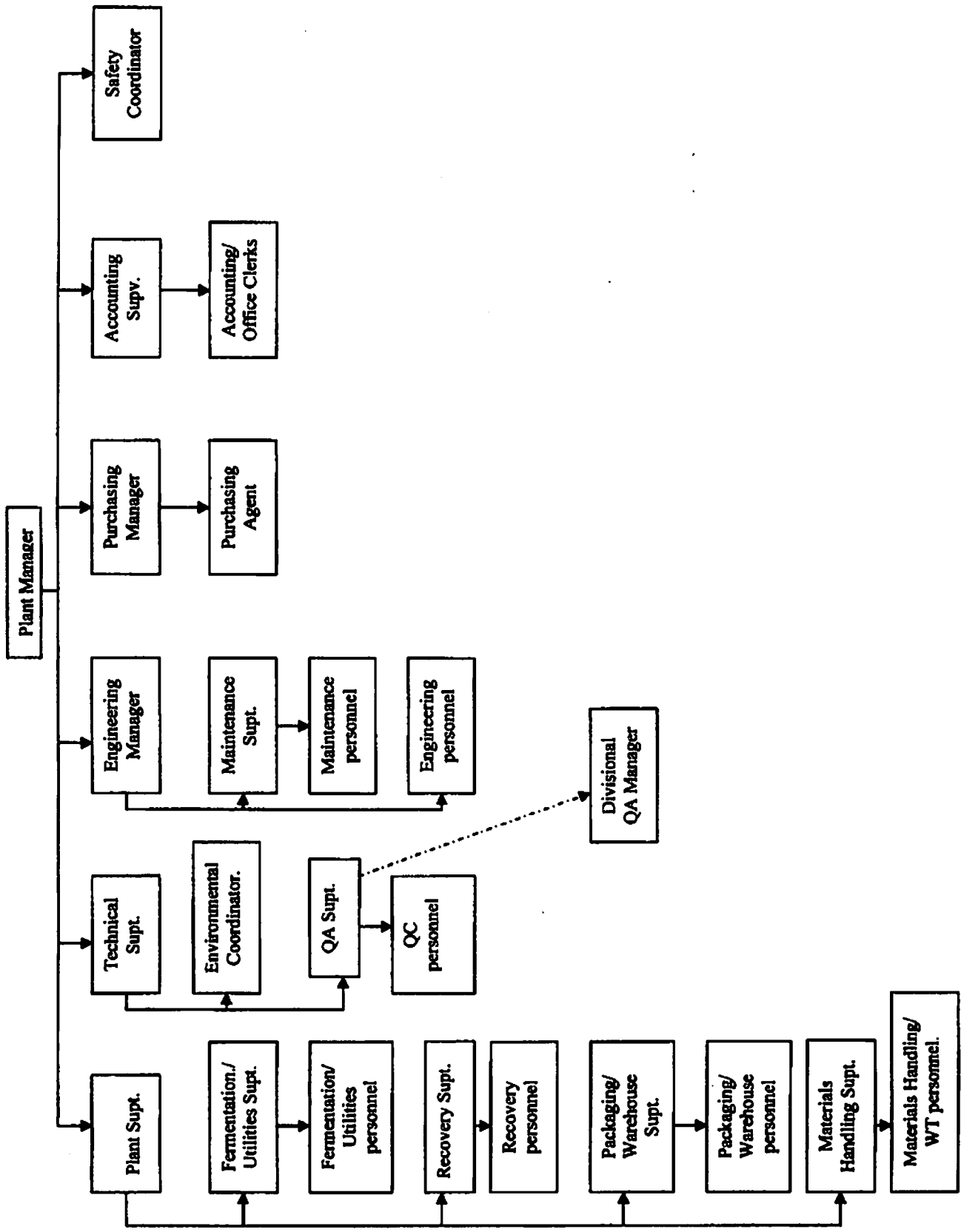
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# ADM SOUTHPORT QUALITY SYSTEMS ORGANIZATIONAL CHART





**TO WHOM IT MAY CONCERN  
CITRIC ACID LOT NUMBERING SYSTEM**

For dry citric products, Citric Acid Anhydrous, USP/FCC, Sodium Citrate Dihydrate, USP/FCC, Sodium Citrate Anhydrous, USP/FCC, and Potassium Citrate Anhydrous, USP/FCC:

**S402161**

Where S = production site (Southport, NC)  
4 = last digit of year; 2004  
02 = month; February 01 to 12 scale  
16 = day of month  
1 = packaging bin number

For Citrosol 501, 502 and 503, 50% Citric Acid Solutions:

**04021601**

Where 04 = last 2 digits of year; 2004  
02 = month; February 01 to 12 scale  
16 = day of month  
01 = batch sequence identifier for that day

Sincerely,  
ADM Technical Services

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ARCHER DANIELS MIDLAND COMPANY BOX 1470 DECATUR, ILLINOIS 62525  
TEL: 800/637-5843 or 217/451-7418 FAX: 217-451-2473  
[www.adm.com](http://www.adm.com)

ADM SOUTHPORT

MASTER DOCUMENT MANUAL #2

LIST OF SOP

=====

SOP100.	WRITING PROCEDURES
SOP101.	PURCHASING
SOP102.	SUPPLIER APPROVAL
SOP103.	LABELING CONTROL
SOP104.	MATERIAL IDENTIFICATION
SOP105.	MANUFACTURING PROCEDURES
SOP106.	IN PROCESS CONTROLS
SOP107.	PROCESS CHANGE PROCEDURE
SOP108.	MASTER MFG. PLAN:CITRIC/CITRATES
SOP109.	ISSUE OF PACKAGING SPECIFICATIONS
SOP110.	VERIFICATION OF RAW MATERIALS
SOP111.	RELEASE OF PACKAGING MATERIALS
SOP112.	ISSUE OF RAW MATERIAL SPEC
SOP113.	RETAINED SAMPLES OF RAW MATERIALS
SOP114.	SHIPMENT OF SAMPLES
SOP115.	PERFORMANCE/QUALITY TRENDS
SOP116.	RECORDS REVIEW
SOP117.	INSPECTION OF FINISHED GOODS
SOP118.	RELEASE OF FINISHED GOODS
SOP119.	ISSUES OF CERTIFICATES OF ANALYSIS
SOP120.	RECORDS RETENTION
SOP121.	APPARATUS IDENTIFICATION
SOP122.	MAINTENANCE & CALIBRATION OF WEIGHT & MEASURING
SOP123.	CALIBRATION OF LAB INSTRUMENTS
SOP124.	EQUIPMENT IDENTIFICATION
SOP125.	INSTRUMENT CALIBRATION - MAINT.
SOP126.	ISOLATION OF REJECTED MATERIAL
SOP127.	REWORK PROCEDURE
SOP128.	PRODUCT WITHDRAWAL PROCEDURE
SOP129.	CORRECTIVE-PREVENTATIVE ACTION
SOP130.	COMPLAINT PROCEDURE
SOP131.	CONTRACT REVIEW
SOP132.	PURCHASER SUPPLIED PRODUCT
SOP133.	DOCUMENT CONTROL
SOP134.	STATISTICAL TECHNIQUES
SOP135.	FINISHED GOODS HANDLING
SOP136.	PEST CONTROL
SOP137.	PACKAGING
SOP138.	MATERIAL MOVEMENT PROCEDURE
SOP139.	AUDITING
SOP140.	PERSONNEL TRAINING
SOP141.	PERSONNEL TRAINING - QC DEPT.
SOP142.	QUALITY CONTROL OF WATER
SOP143.	RECORDED LABORATORY WORK
SOP144.	RESERVE SAMPLE OF FINISHED GOODS
SOP145.	PREVENTION OF CONTAMINATION FROM ENGINEERING WORK
SOP146.	PLANT COMPUTER CONTROL
SOP147.	PRODUCT/PERSONAL PROTECTION PROCEDURE



ADM SOUTHPORT

MASTER DOCUMENT MANUAL #2

LIST OF SOP

=====

- SOP148. . . . . USE OF SAMPLING DEVICES
- SOP149. . . . . MATERIAL DISPOSAL
- SOP150. . . . . CLEANING OF PRODUCTION
- SOP151. . . . . RETURNED GOODS PROCEDURE
- SOP152. . . . . ASSEMBLY OF FINISHED GOODS LOT DOSSIER
- SOP153. . . . . HANDLING OF SPECIAL CUSTOMER REQUIREMENTS
- SOP154. . . . . FAILURE ANALYSIS
- SOP155. . . . . DAILY PRODUCTION STATUS REPORT
- SOP156. . . . . ISSUE OF PRODUCT SPECIFICATIONS
- SOP157. . . . . HANDLING OF REGULATORY INSPECTIONS
- SOP158. . . . . GOOD MANUFACTURING PRACTICES
- SOP159. . . . . HAZARD ANALYSIS CRITICAL CONTROL POINT PLAN
- SOP160. . . . . SEALING PROCEDURE
- SOP161. . . . . PRODUCT DOWNGRADE
- SOP162. . . . . NON-SOLUBLE RESIDUE, NSR SAMPLING PROTOCOL
- SOP163. . . . . STABILITY TESTING PROGRAM
- SOP164. . . . . ALLERGEN CONTROL**
- SOP165. . . . . REWORK PROGRAM**
- SOP166. . . . . PRODUCT CONTACT AIR QUALITY PROGRAM**
- SOP167. . . . . PRODUCT INFORMATION PROGRAM**
- SOP168. . . . . FACILITY SECURITY/ACCESS CONTROL ASSESSMENT**
- SOP169. . . . . GLASS BRITTLE PLASTIC POLICY**
- SOP170. . . . . ENVIRONMENTAL MONITORING PROGRAM**
- SOP172. . . . . CHEMICAL CONTROL PROGRAM**
- SOP175. . . . . CONDITIONED AIR QUALITY AND VENTILATION IN FINISHED PACKAGING AND WAREHOUSE**
- SOP175. . . . . HACCP PLAN FOR CITRIC ACID**
- SOP176. . . . . HACCP PLAN FOR CITROSOL 501**
- SOP177. . . . . HACCP PLAN FOR SODIUM AND POTASSIUM CITRATE**
- SOP178. . . . . MANAGEMENT OF CHANGE (MOC)**
- SOP179. . . . . SOFTWARE CHANGE REQUEST**
- SOP180. . . . . ASSESSMENT OF FOOD SAFETY TRAINING EFFECTIVENESS**
- SOP181. . . . . DAILY MEETING ACTION ITEM PROCEDURE**
- ESOP600. . . . . SOUTHPORT- LEGAL ENVIRONMENTAL REQUIREMENTS (2)**
- ESOP601. . . . . SOUTHPORT IDENTIFYING ENVIRONMENTAL ASPECTS**



Archer Daniels Midland Co  
4666 Faries Parkway  
Decatur, IL 62526

November 20, 2015

RE: Code of Conduct and Ethics

Thank you for your recent inquiry. Archer Daniels Midland Company is committed to integrity in the conduct of all its business affairs and has implemented an integrity program to ensure achievement of this commitment. Attached, please find a copy of ADM's Business Code of Conduct and Ethics implemented by ADM and distributed to its employees. In this Code, ADM employees are informed of the objective to operate ADM's business in accordance with the highest ideals of character and business conduct. In addition, the Code states our policy to abide by the national and local laws of the countries in which we operate. ADM is committed to operating its business in accordance with all applicable laws and regulations, including those relative to environmental protection, food safety, labor and individual employee rights. We hope this material will satisfy your company that ADM is committed to integrity in its business.

Because of the values and integrity program that ADM has itself implemented, it has determined that wholesale acceptance and adoption of values and principles from other companies is inappropriate and would elevate form over substance. Therefore, ADM requests that you accept this information as confirmation that our company meets the criteria you have set for your Company's suppliers and to serve as a substitute for acceptance by ADM of your Code of Conduct.

Regards,

A handwritten signature in blue ink, appearing to read "Patty Pagel", is written over a faint, larger version of the signature.

Patty Pagel  
Director, Quality & Technical Service  
[patty.pagel@adm.com](mailto:patty.pagel@adm.com)  
217-451-2314

Patty Pagel  
Director, Quality & Technical Service  
Corn Business Unit



Archer Daniels Midland Company  
Corn Business Unit

ADM Technical Services | 4666 Faries Parkway, Decatur IL 62526  
P: 800.238.9026 | F: 217.451.2153 | CPTechService@adm.com

## Proposition 65 Statement

In response to your inquiry, we are familiar with the list of chemicals published pursuant to the California Safe Drinking Water and Toxic Enforcement Act of 1986, as amended, and the related regulations, which are generally known as Proposition 65. It is our opinion that Proposition 65 does not require any warning label for the products we sell you.

As you know, our products are manufactured from a number of agricultural products where naturally occurring chemicals may be present. All agricultural products may from time to time contain one or more of the chemicals which have been listed under Proposition 65, allow, subject to certain conditions, naturally occurring chemicals to be present in food products. See: Cal. Code Regs., Title 27, Sec. 25501

If you have any questions, please do not hesitate to contact Technical Services.

Sincerely,

Patty Pagel

Director – Technical Services and Quality

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07/16/2015

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**Archer Daniels Midland Company  
Corn Business Unit**

ADM Technical Services | 4666 Faries Parkway, Decatur IL 62526  
P: 800.238.9026 | F: 217.451.2153 | CPTechService@adm.com

## **Metal Catalysts/Reagents in Citric Products**

ADM Citric products (Citric Acid, Sodium Citrate and Potassium Citrate) are produced by the fermentation of carbohydrates from corn and molasses. ADM produces these products for food/excipient use only. Metal Catalysts are not used in the production of ADM Citric products and Metal Reagents (as listed in the EMEA/CHMP/SWP/4446/2000 guideline) are not added during the manufacturing process.

We are happy to provide this information to you. Please do not hesitate to contact us if you have questions or need additional information.

ADM Technical Service

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**Archer Daniels Midland Company  
Corn Business Unit**

ADM Technical Services | 4666 Faries Parkway, Decatur IL 62526  
P: 800.238.9026 | F: 217.451.2153 | CPTechService@adm.com

**ADM Citric Acid and Citrates and the NOP National List of Allowed and Prohibited Substance**

ADM Citric Acid products meet the annotation requirements of Citric Acid in 7 CFR Part §205.605; produced by the fermentation of carbohydrate substances by an unmodified organism. ADM Citric Acid Anhydrous, USP-NF/FCC (Excipient/Food Use Only), may be used in organic products in accordance with 7CFR §205.605; Non-agricultural (non-organic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients in food group(s))", Sec. (a) Non-synthetics allowed.

ADM Sodium Citrate Dihydrate, USP-NF/FCC (Excipient/Food Use Only), Sodium Citrate Anhydrous, USP-NF/FCC (Excipient/Food Use Only), and Potassium Citrate, USP-NF/FCC (Excipient/Food Use Only), may be used in organic products in accordance with 7 CFR §205.605; non-agricultural (non-organic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food group(s))", Sec. (b) Synthetics allowed.

If you need any additional information or if you have any questions, please do not hesitate to contact us.

Sincerely,

ADM Corn Division Technical Services

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## Archer Daniels Midland Company Corn Business Unit

ADM Technical Services | 4666 Faries Parkway, Decatur IL 62526  
P: 800.238.9026 | F: 217.451.2153 | CPTechService@adm.com

### Irradiation and Radioactive Contamination

The ADM products listed below have not been irradiated and are free of radioactive contamination.

#### All Products

Alcohol-Beverage, Fuel and Industrial Grade	Maltodextrin (Clintose®)
Allulose (JustSweet™)	Potassium Citrate
Citric Acid Anhydrous	Propylene Glycol
Corn Syrup-Liquid and Solids	Resistant Maltodextrins (Fibersol®)
Corn Starch-Food and Industrial Grade	Sodium Citrate-Anhydrous and Dihydrate
Crystalline Dextrose (Clintose®)	Sorbitol-Liquid, Dry and Non-Crystallizing
Crystalline Fructose (CornSweet®)	Sucralose (VivaSweet™)
Glycerin	Sucrose*-Dry, Liquid and Invert
High Fructose Corn Syrups (CornSweet®)	Sweetener Blends
Liquid Citric Acid-Food and Industrial Grade (Citrosol®)	Xanthan Gum ( NovaXan™)
Maltitol Syrup	

*\*Sourced from sugarcane and sugar beets*

#### Feed Products

Citristim	Golden Synergy™
Corn Germ Meal	Liquid Gold
Corn Gluten Feed	Liquid Lysine
Corn Gluten Meal	L-Lysine HCl
Distiller's Corn Oil	L-Threonine
Distiller's Dried Grains with Solubles	Modified Wet Distiller's Grains
Golden Gluten	Proplex DY, T, Y

Please contact us with questions.

#### ADM Technical Services

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06/23/2015

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ADM Technical Services  
4666 Faries Parkway      Decatur, IL 62526  
Phone: 217/451-4524      Fax: 217/451-2473  
www.adm.com

## **USP <467> Residual Solvents in Citric Products**

To Whom It May Concern:

ADM Citric products (Citric Acid; Sodium Citrate and Potassium Citrate) are produced by an aqueous fermentation and recovery process. No USP <467> Class 1, Class 2, Class 3 solvents, or other solvents are used in the manufacture of these products nor are they likely to be present in the finished products.

If you need any additional information or if you have any questions, please, do not hesitate to contact me.

Sincerely,  
ADM Technical Service

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CA-029-130603



TECHNICAL SERVICES  
4666 FARRIS PARKWAY  
DECATUR, IL 62526  
TEL: 217-424-7418  
FAX: 217-424-2473  
[www.adm.com](http://www.adm.com)

## Animal Testing on ADM Products

07/02/2013

### Confirmation:

Archer Daniels Midland Company (ADM) manufactures the products listed below. ADM does not conduct animal testing on these products for cosmetic purposes or for use in house hold cleaning agents. ADM would have no have knowledge of animal testing performed on these products after they are sold into commercial or government markets.

Citric Acid Anhydrous, USP/FCC  
Citrosol<sup>®</sup> 501, 502 and 503  
Potassium Citrate, USP/FCC  
Sodium Citrate Anhydrous, USP/FCC  
Sodium Citrate Dihydrate, USP/FCC  
Lactic Acid 88, 90% USP Heat Stable  
Lactic Acid 50, 80 and 88% FCC  
Arlac S (Sodium Lactate)  
Arlac P (Potassium Lactate)  
Ethyl Lactate FCC  
NovaXan<sup>™</sup> NF/FCC (Xanthan Gum)  
OptiXan<sup>™</sup> Industrial Grade Xanthan Gum  
Sorbitol Solution, USP/FCC  
Sorbitol Crystalline, NF/FCC  
Sorbitol Solution, Noncrystallizing  
Sorbitol Solution, High Mannitol  
Resistant Maltodextrin (Fibersol-2<sup>™</sup>)  
USP Glycerin  
Propylene Glycol

If you need any additional information or have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Patty Pagel".

Patty Pagel

Director, Quality and Technical Services  
Corn Business Unit

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MI-014-110511





ADM Technical Services  
4666 Faries Parkway      Decatur, IL 62526  
Phone: 217/451-7418      Fax: 217/451-2473

December 23, 2008

To Whom It May Concern:

ADM Citric products are produced following U.S. Food and Drug Administration Good Manufacturing Practices Guidelines and are fit for human consumption. Phthalates are not used in the production of ADM's Citric Acid and Citrate salts nor expected to be found in the finished product.

We are happy to provide this information. Please do not hesitate to contact our Technical Service office if you have questions or need additional information. The toll free number here in Decatur is 1-800-553-8411

Sincerely,  
ADM Technical Services  
Specialty Food Ingredients Division

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08/05/2005



TO WHOM IT MAY CONCERN

MICROBIOLOGICAL TESTING ON CITRIC ACID AND CITRATE SALTS

Your inquiry regarding routine microbiological testing on ADM citric acid and citrate salts was forwarded to my attention. Please be advised that microbiological testing is not routinely performed on every lot. However, periodic spot checks are made and typical data are:

**1. Citric Acid Anhydrous, UPS/FCC**

Aerobic Plate Count	15 CFU/g
Yeasts & Molds	<5 CFU/g
Salmonella	Negative
E. coli	Negative

**2. Sodium Citrate Dihydrate, USP/FCC**

Aerobic Plate Count	<5 CFU/g
Yeasts & Molds	<5 CFU/g
Salmonella	Negative
E. coli	Negative

**3. Potassium Citrate, USP/FCC**

Aerobic Plate Count	<5 CFU/g
Yeasts & Molds	<5 CFU/g
Salmonella	Negative
E. coli	Negative

If we can be of further assistance, please do not hesitate to contact us.

Sincerely,  
ADM Technical Services

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TEL: 800/637-5843 or 217/451-7418 FAX: 217-451-2473  
www.adm.com



ADM Technical Services  
4666 Faries Parkway      Decatur, IL 62526  
Phone: 217/451-4524      Fax: 217/451-2473

RE: Latex in ADM Citric Products

To Whom It May Concern:

Please be advised that Latex is not used in the manufacture of ADM Citric products.

We are happy to provide this information to you. Please do not hesitate to contact me if you have questions or need additional information. The toll free number here in Decatur is 1-800-553-8411

Sincerely,  
ADM Technical Service

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ADM Technical Services

4666 Faries Parkway Decatur, IL 62526

Phone: 217/451-7418 Fax: 217/451-2473

February 12, 2013

To Whom It May Concern:

RE: Sulfites in ADM Citric Products

Be advised that there are no sulfites present (levels greater than 10 ppm) in ADM Citric products (including citric acid; sodium citrate and potassium citrate).

We are happy to provide this information to you. Please do not hesitate to contact me if you have any questions or need additional information. The toll free number here in Decatur is 1-800-553-8411.

Best regards,

ADM Technical Service

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## BULK DENSITY\* OF CITRIC PRODUCTS

PRODUCT	Loose lb/ft <sup>3</sup>	Loose gm/cm <sup>3</sup>	Packed lb/ft <sup>3</sup>	Packed gm/cm <sup>3</sup>
Citric Acid Anhydrous				
Granular	56	0.897	64	1.025
Fine Granular	53	0.849	59	0.945
Powder	27	0.432	51	0.817
Citric Acid Monohydrate				
Granular	48	0.769	54	0.865
Fine Granular	51	0.817	56	0.897
Powder	31	0.497	47	0.753
Sodium Citrate Dihydrate				
Granular	62	0.993	69	1.105
Fine Granular	60	0.961	68	1.089
Powder	35	0.561	54	0.865
Sodium Citrate Anhydrous				
Granular	56	0.897	62	0.993
Powder	34	0.545	47	0.753
Potassium Citrate	69	1.105	80	1.281

\*These are average typical bulk densities and not specification values

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ARCHER DANIELS MIDLAND COMPANY BOX 1470 DECATUR, ILLINOIS 62525  
TEL: 800/637-5843 or 217/451-7418 FAX: 217-451-2473  
www.adm.com



## Archer Daniels Midland Company Corn Business Unit

ADM Technical Services | 4666 Faries Parkway, Decatur IL 62526  
P: 800.238.9026 | F: 217.451.2153 | CPTechService@adm.com

### Melamine Statement

The ADM products listed below are derived, processed and refined without the use of melamine or melamine-related products:

#### All Products

Alcohol-Beverage, Fuel and Industrial Grade	Maltodextrin (Clintose®)
Allulose (JustSweet™)	Potassium Citrate
Citric Acid Anhydrous	Propylene Glycol
Corn Syrup-Liquid and Solids	Resistant Maltodextrins (Fibersol®)
Corn Starch-Food and Industrial Grade	Sodium Citrate-Anhydrous and Dihydrate
Crystalline Dextrose (Clintose®)	Sorbitol-Liquid, Dry and Non-Crystallizing
Crystalline Fructose (CornSweet®)	Sucralose (VivaSweet™)
Glycerin	Sucrose*-Dry, Liquid and Invert
High Fructose Corn Syrups (CornSweet®)	Sweetener Blends
Liquid Citric Acid-Food and Industrial Grade (Citrosol®)	Xanthan Gum ( NovaXan™)
Maltitol Syrup	

\*Sourced from sugarcane and sugar beets

#### Feed Products

Citristim	Golden Synergy™
Corn Germ Meal	Liquid Gold
Corn Gluten Feed	Liquid Lysine
Corn Gluten Meal	L-Lysine HCl
Distiller's Corn Oil	L-Threonine
Distiller's Dried Grains with Solubles	Modified Wet Distiller's Grains
Golden Gluten	Proplex DY, T, Y

If you have any questions, please do not hesitate to contact us.

ADM Technical Services

Date Approved  
01/25/2016

Version  
1.0

Document #  
CBU.TS.MISC.074

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## TYPICAL TRACE METAL CONTENT FOR CITRIC PRODUCTS

	Citric Acid Anhydrous	Sodium Citrate Anhydrous	Sodium Citrate Dihydrate	Potassium Citrate	GDL
Calcium	2.2	2.6	2.7	2.6	0.4
Iron	<0.1	1.0	0.8	0.4	<0.1
Sodium	2.9	26.7% <sup>DB</sup>	26.7% <sup>DB</sup>	300	2.5
Potassium	2.9	330	1248	36.2% <sup>DB</sup>	3.3
Zinc	ND	0.01	0.01	0.01	ND
Mercury	ND	ND	ND	ND	ND
Arsenic	ND	ND	ND	ND	ND
Boron	ND	ND	ND	ND	ND
Tin	ND	ND	ND	ND	ND
Antimony	ND	ND	ND	ND	ND
Lead	ND	ND	ND	ND	ND
Bismuth	ND	ND	ND	ND	ND
Silver	ND	ND	ND	ND	ND
Nickel	ND	ND	ND	ND	ND
Cadmium	ND	ND	ND	ND	ND

All values in parts per million (ppm) unless indicated otherwise

ND = None Detected (<0.1ppm)

DB = Stoichiometric - Dry Basis

All data generated by ICAP-AES  
(Inductively Coupled Argon Plasma  
Atomic Emission Spectroscopy)

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**TEL: 800/ 637-5843 or 217/ 451-7418 FAX: 217/ 451-2473**  
**WWW.ADMWORLD.COM**



## BULK DENSITY\* OF CITRIC PRODUCTS

PRODUCT	Loose lb/ft <sup>3</sup>	Loose gm/cm <sup>3</sup>	Packed lb/ft <sup>3</sup>	Packed gm/cm <sup>3</sup>
Citric Acid Anhydrous				
Granular	56	0.897	64	1.025
Fine Granular	53	0.849	59	0.945
Powder	27	0.432	51	0.817
Citric Acid Monohydrate				
Granular	48	0.769	54	0.865
Fine Granular	51	0.817	56	0.897
Powder	31	0.497	47	0.753
Sodium Citrate Dihydrate				
Granular	62	0.993	69	1.105
Fine Granular	60	0.961	68	1.089
Powder	35	0.561	54	0.865
Sodium Citrate Anhydrous				
Granular	56	0.897	62	0.993
Powder	34	0.545	47	0.753
Potassium Citrate	69	1.105	80	1.281

\*These are average typical bulk densities and not specification values

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www.adm.com





ADM Technical Services  
4666 Faries Parkway      Decatur, IL 62526  
Phone: 217/451-7418      Fax: 217/451-2473

June 15, 2010

RE: Mustard and ADM Citric Products

To Whom It May Concern:

Please be advised that mustard is not used in the manufacture of ADM citric products (including citric acid sodium citrate and potassium citrate) nor is mustard added to the finished product.

We are happy to provide this information to you. Please do not hesitate to contact me if you have questions or need additional information. The toll free number here in Decatur is 1-800-553-8411

Sincerely,  
ADM Technical Service

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ADM Technical Services  
4666 Faries Parkway      Decatur, IL 62526  
Phone: 217/451-7418      Fax: 217/451-2473  
www.admworld.com

February 1, 2010

To Whom It May Concern:

Subject: ADM Pallets for Citric products

Be advised that the ADM manufacturing facility (Southport, NC) for our Citric Products use new pallets that have been heat treated to ship product. Please note that the chemicals Tribromanisole and Tribromophenol are NOT used in the treatment of these pallets. The heat treatment stamp can be found on each individual pallet. The origin of the wood for these pallets is from North America.

We are happy to provide this information. If we can be of further assistance please contact our Technical Service office.

Sincerely,  
ADM Technical Service

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10/10/2005



ADM Technical Services  
4666 Faries Parkway      Decatur, IL 62526  
Phone: 217/451-7418      Fax: 217/451-2473  
www.admworld.com

October 29, 2009

To Whom It May Concern:

Subject: Presence of Diacetyl in ADM Citric Products

ADM does not use Diacetyl in the manufacture of the Citric products (including Citric Acid; Sodium Citrate and Potassium Citrate). Further, based on our knowledge of the raw materials and our process we do not expect Diacetyl to be in the finished products, consequently, our citric products are not tested for this compound.

We are happy to provide this information to you. If we can be of further assistance please contact our Technical Services office.

Sincerely,  
ADM Technical Service

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10/10/2005



ADM Technical Services  
4666 Faries Parkway      Decatur, IL 62526  
Phone: 217/451-7418      Fax: 217/451-2473

August 3,2009

Subject: Sieving (Sifting) of ADM Citric Products

Whom It May Concern:

This is in regard to your inquiry for confirmation that ADM's Citric Products are sifted.

Please be advised that ADM Citric products (including Citric acid, sodium and potassium citrate) are screened(sifted) in accordance with our manufacturing requirements for the appropriate particle size. Product is directed through Rotex classification screens just prior to entering the final storage bin for pack off.

The COA for these products report the appropriate size screen values for the lot.

We are happy to provide this information to you. Please do not hesitate to contact me if you have questions or need additional information. The toll free number here in Decatur is 1-800-553-8411

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ADM Technical Service

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10/10/2005



ADM Technical Services  
4666 Faries Parkway      Decatur, IL 62526  
Phone: 217/451-7418      Fax: 217/451-2473

Date: July 14, 2008

Re: WADA Compliance of ADM Citric Products

To Whom It May Concern:

ADM's Citric products are manufactured and tested according to United States Pharmacopoeia (USP) and Food Chemical Codex (FCC) requirements.

None of the items listed on the 2008 Prohibited List of the International Standard in the World Anti-Doping Code are added to our manufacturing processes or expected to be found in our finished citric products (including Citric Acid, Sodium Citrate and Potassium Citrate); consequently, we do not test for them.

We are happy to provide this information to you. Please do not hesitate to contact me if you have questions or need additional information.

Sincerely,  
ADM Technical Service

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08/18/2005



**Archer Daniels Midland Company  
Corn Business Unit**

ADM Technical Services | 4666 Faries Parkway, Decatur IL 62526  
P: 800.238.9026 | F: 217.451.2153 | CPTechService@adm.com

## Raw Materials Statement: ADM Citric Products

ADM citric acid products are produced by the fermentation of carbohydrates from corn and/or molasses. Citric acid is manufactured in a closed dedicated system. Sodium and potassium citrate are campaigned on the same manufacturing line utilizing a hot water cleaning procedure between campaigns. The manufacturing processes for these products are carried out in closed systems.

If you have any questions, please do not hesitate to contact us.

ADM Technical Services

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**Date Approved**  
03/10/2016

**Version**  
1.0

**Document #**  
CBU.TS.AC 005

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# CUSTOMS - TRADE PARTNERSHIP AGAINST TERRORISM

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*In recognition of your commitment to partnership,  
and in appreciation for joining with us to secure  
the international supply chain and protect our country's security,*

***U.S. Customs and Border Protection***

*is pleased to certify your membership in the*

***Customs - Trade  
Partnership Against Terrorism***

*and to present this certificate to*

***Archer Daniels Midland Company***

***Importer***

*During the month of* June, 2005  
*at Washington, D.C.*

*Alte. Bower*  
\_\_\_\_\_  
*Commissioner*



## Irradiation and Radioactive Contamination

All ADM approved food-grade manufacturing facilities have documented Food Safety Plans that are compliant with the Final Rule for the Hazard Analysis and Risk-Based Preventive Controls for Human and Animal Food. Each Food Safety Plan's associated Risk Assessment takes into consideration the possibility of radioactive contamination and irradiation. No radiological or irradiation risks have been identified by the Food Safety Teams.

The ADM products listed below have not been irradiated and are free of radioactive contamination.

### Food and Industrial Grade Products

Acidulants (Citric Acid, Potassium and Sodium Citrate)	Monk Fruit (VerySweet™)
Alcohol-Beverage, Fuel and Industrial Grade	Polyols-Liquid, Dry and Non-Crystallizing
Allulose (JustSweet™)	Propylene Glycol (EVO-100™)
Corn Starch-Food and Industrial Grade	Resistant Maltodextrins (Fibersol®)
Corn Syrup-Liquid and Solids	Stevia (SweetRight™)
Crystalline Dextrose (Clintose®)	Sucralose (VivaSweet™)
Crystalline Fructose (CornSweet®)	Sucrose*-Dry, Liquid and Invert
Glycerin	Sweetener Blends
High Fructose Corn Syrups (CornSweet®)	Xanthan Gum ( NovaXan® and OptiXan™)
Maltodextrin (Clintose®)	

*\*Sourced from sugarcane and sugar beets*

### Feed Products

CitriStim®	Golden Synergy™
Corn Germ Meal	Liquid Gold™
Corn Gluten Feed	Liquid Lysine
Corn Gluten Meal	L-Lysine HCl
DHA Natur™	L-Threonine
Distiller's Corn Oil	Wet/Modified Wet Distiller's Grains
Distiller's Dried Grains with Solubles	PRO DY™
Golden Gluten™	PROPLEX® DY and T

Date Approved  
07/19/2017

Version  
2.0

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CBU.TS.MISC.020

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**Archer Daniels Midland Company  
Corn Business Unit**

ADM Technical Services | 4666 Faries Parkway, Decatur IL 62526  
P: 800.238.9026 | F: 217.451.2153 | CPTechService@adm.com

## Sewage Sludge Contamination Statement

The ADM products listed in the tables below are free of sewage sludge contamination.

Alcohol-Beverage, Fuel and Industrial Grade	Maltodextrin (Clintose®)
Allulose (JustSweet™)	Potassium Citrate
Citric Acid Anhydrous	Polyols-Liquid, Dry and Non-Crystallizing
Corn Syrup-Liquid and Solids	Propylene Glycol
Corn Starch-Food and Industrial Grade	Resistant Maltodextrins (Fibersol®)
Crystalline Dextrose (Clintose®)	Sodium Citrate-Anhydrous and Dihydrate
Crystalline Fructose (CornSweet®)	Sucralose (VivaSweet™)
Glycerin	Sucrose*-Dry, Liquid and Invert
High Fructose Corn Syrups (CornSweet®)	Sweetener Blends
Liquid Citric Acid-Food and Industrial Grade (Citrosol®)	Xanthan Gum ( NovaXan™)

\*Sourced from sugarcane and sugar beets

### Feed Products

Citristim	Golden Synergy™
Corn Germ Meal	Liquid Gold
Corn Gluten Feed	Liquid Lysine
Corn Gluten Meal	L-Lysine HCl
Distiller's Corn Oil	L-Threonine
Distiller's Dried Grains with Solubles	Modified Wet Distiller's Grains
Golden Gluten	Proplex DY, T, Y

Date Approved  
08/22/2016

Version  
1.0

Document #  
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**Archer Daniels Midland Company  
Corn Business Unit**

ADM Technical Services | 4666 Faries Parkway, Decatur IL 62526  
P: 800.238.9026 | F: 217.451.7574 | CPTechService@adm.com

## **Conflict Mineral Declaration**

In July 2010, the United States Securities and Exchange Commission adopted the Dodd-Frank Reform and Consumer Protection Act (herein referred to as the “Act”). This Act requires U.S. companies to disclose, on an annual basis, whether any “Conflict Minerals” are necessary to the functionality or production of any of their products (see §1502 of the Act). A “Conflict Mineral” is considered to be any of the following minerals or their derivatives originating in the Democratic Republic of the Congo (the “DRC”) or any of the adjoining countries with which the DRC shares a recognized international border:

- Tin (cassiterite)
- Tantalum (columbite-tantalite)
- Tungsten (Wolframite)
- Gold

ADM complies with all national and other applicable laws and regulations. We are committed to keeping our supply chain free from conflict minerals which are covered by laws and regulations concerning the sourcing of minerals from conflict areas.

Based on currently available information, ADM does not use conflict minerals originating in the Democratic Republic of the Congo and its adjoining countries.

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## Archer Daniels Midland Company Corn Business Unit

ADM Technical Services | 4666 Faries Parkway, Decatur IL 62526  
P: 800.238.9026 | F: 217.451.2153 | CPTechService@adm.com

### Pesticides Statement

ADM's Corn Business unit employs an ongoing pesticide monitoring program to ensure there are no detectable pesticide residues found in our finished products as listed below.

For products where corn is the primary raw material, corn is sourced through regional grain distribution systems, regulated by the USDA. The EPA regulates the types of pesticides that may be employed on corn, and has published a list of approved pesticides. Corn that is purchased on the open market may or may not have been treated with these approved materials. ADM does not apply any pesticides on the corn that we process.

#### Food and Industrial Grade Products

Acidulants-Citric Acid, Potassium and Sodium Citrate	High Fructose Corn Syrups (CornSweet®)
Alcohol-Beverage, Fuel and Industrial Grade	Maltodextrin (Clintose®)
Allulose (JustSweet™)	Monk Fruit (VerySweet™)
Corn Starch-Food and Industrial Grade	Stevia (SweetRight™)
Corn Syrup-Liquid and Solids	Sucralose (VivaSweet™)
Crystalline Dextrose (Clintose®)	Sucrose*-Dry, Liquid and Invert
Crystalline Fructose (CornSweet®)	Sweetener Blends
Erythritol	

*\*Sourced from sugarcane and sugar beets*

#### Feed Products

CitriStim®	Golden Synergy™
Corn Germ Meal	Liquid Gold™
Corn Gluten Feed	L-Lysine 50%
Corn Gluten Meal	L-Lysine HCl
DHA Natur™	L-Threonine
Distiller's Corn Oil	Wet/Modified Wet Distiller's Grains
Distiller's Dried Grains with Solubles	PROPLEX® DY and T
Golden Gluten™	PRO DY™

Please do not hesitate to contact us if you have any questions.

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