



## **Business Code of Conduct**

This Business Code of Conduct (Code) sets out Tate & Lyle’s standards, expectations, and commitments with respect to key areas of corporate responsibility. Tate & Lyle is committed to upholding high standards of responsible and ethical behaviour in its own operations and to support a similar commitment amongst its business partners.

### **Vision and Values**

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Tate & Lyle’s vision is to become the world’s leading manufacturer of renewable food and industrial ingredients. We will grow our business by providing a portfolio of distinctive value-added products and services for our customers built on the foundation of responsible business practices.

Corporate responsibility for Tate & Lyle means applying our four core values – safety, knowledge, innovation and integrity – to the way we run our business. This involves continuous progress in: achieving the highest standards of safety; assessing the environmental impact of every aspect of what we do; and treating our employees, business partners and local communities with dignity and respect.

### **Scope of Application**

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This Code applies unconditionally to all operations and subsidiary companies wholly-owned by Tate & Lyle. We will also seek to apply the Code’s principles in those operations where we have a 50% stake or more. For those business operations where we have a minority interest, for our suppliers and contractors (together our “business partners”), we will communicate our Code to them and will actively encourage them to work rigorously towards adopting and implementing its principles within their own operations. We recognize that because these operations encompass many different legal, political, cultural, economic, and social environments, the speed and extent of implementation of the Code’s principles will necessarily vary. Our policy is to work collaboratively with our business partners to assist them in implementing the Code’s principles, including such areas as training and development, raising awareness, and sharing best practice.

### **Legal Compliance**

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Tate & Lyle will comply with all applicable local, national, and supra-national laws and regulations in every country in which it operates. In countries, or specific situations, where there is no law or regulation governing a particular activity or operation, Tate & Lyle will seek to conduct operations consistent with the principles of this Code.

## **Workplace**

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Tate & Lyle is committed to providing a workplace built on trust, honesty, fair treatment, and respect for basic human values. A successful and sustainable business requires a workforce that is given the opportunities and incentives to develop professionally and to live full lives outside of the workplace. Tate & Lyle applies the following principles which are based on internationally recognized workplace rights:

- Child labor is not allowed under any circumstances. A child is defined as any person less than fifteen years of age, unless local law stipulates a higher age for work or for the continuation of mandatory schooling, in which case the higher age would apply. The one allowable exception is if the country defines the minimum age for work as 14 years in accordance with ILO Convention 138. National laws may permit the employment of children aged 13 to 15 years (12 to 14 years for light work) if the job is not harmful to their health and development, does not interfere with attendance at school or vocation programs, and is not detrimental to their ability to learn.
- All employment relationships are of a voluntary nature. Use of forced or prison labor and/or indentured or bonded labor is not allowed under any circumstances.
- Workers rights of freedom of association are recognized and respected. Workers exercising their rights of freedom of association shall not be discriminated against.
- Hiring and employment decisions, including those relating to compensation, benefits, promotion, training and development, discipline, and termination, are made solely on the basis of the skill, ability, and performance of workers. Discrimination is not permitted on the basis of gender, age, disability, marital status, sexual orientation, religion or other beliefs and ethnic or national origin.
- Wages shall be provided at least equal to the applicable legal minimum wage and any associated statutory benefits. Overtime hours shall be paid at either the legally mandated premium or, in the absence of laws or agreements to that effect, at the same rate as regular hours worked. Working hours (regular and overtime) shall reflect applicable national and local legal norms. When overtime hours are required, every effort shall be made to minimize their impact on workers. Every effort shall be made to provide at least one day of rest during a seven day work period.

## **Community**

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Tate & Lyle has a long and distinguished record of supporting the communities in which our operations are located through the donation and investment of financial resources and the direct involvement of our employees. We strive to have a positive impact on communities, and to build relationships with local organizations. Prosperous and healthy communities are central to our view of sustainable business, and we are dedicated to improving our impact by further integrating our community involvement programs throughout the company.

## Health & Safety

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Tate & Lyle places a high priority on ensuring that its facilities are safe for workers, visitors, and for the communities in which they are embedded. This is not only a legal responsibility, but a business imperative as well. At Tate & Lyle there is no acceptable level of accidents and we have set a target of zero accidents for every operation around the world. Tate & Lyle has an extensive safety and health risk management program that encompasses all of our global operations and includes:

- Complying with applicable national/local laws relating to workplace safety and health;
- Documenting safety procedures and implementation of training programs for workers to ensure that they are aware of workplace hazards;
- Assessing, identifying, and controlling potential hazards;
- Understanding the risks associated with equipment and processes; and
- Monitoring and analyzing safety indicators.

## Environment

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Tate & Lyle believes that companies must take steps to manage their impact on the natural environment. As a consequence we are committed to conducting our business in a manner that is sensitive to the environmental needs of the communities within which we operate. This aim will be achieved by upholding defined, key environmental standards in all our operations, which include:

- **Management systems:** Integrate environmental management into operational systems and training and monitoring activities, and enforce through a robust reporting system;
- **Continuous improvement:** Seek continuous improvement in reducing the environmental footprint of operations through such means as the use of renewable energy resources;
- **Prior assessment:** Commit to assessing environmental impacts before undertaking a new activity or project and before decommissioning a facility or leaving a site; and
- **Measurement:** Commit to measure and minimize our environmental impact in the three areas where our business most significantly impacts the environment being energy use, water use, and non-hazardous solid waste production.

Tate & Lyle recognizes that companies should take steps to manage their impact on climate change and, to this end we have established a program to analyze our carbon footprint across our manufacturing and transport activities. We are committed both to minimizing our carbon footprint and to reporting our footprint to all stakeholders on an annual basis.

## Food Safety and Quality

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Tate & Lyle is committed to providing agriculture-based products that are safe and of the highest quality, and will not sell or distribute products if they do not meet applicable company specifications and government laws and regulations.

## **Bribery & Corruption and Conflicts of Interest**

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Tate & Lyle will adhere to all national legislation and will seek to maintain high ethical standards in all of our operations around the world. Gifts and entertainment, other than those of nominal value, cannot be accepted without full disclosure, and any understandings regarding benefits in exchange for such gifts are strictly forbidden. Employees must not pay bribes or make illicit payments in order to advance Tate & Lyle's interest and must, in the course of making business decisions and carrying out their job responsibilities, avoid conflicts of interest between personal, direct or indirect interests and the interests of the company and its business objectives. Any person acting on behalf of Tate & Lyle must ensure that the best interests of the company are respected and the use of its assets is intended to benefit the company for a legitimate business purpose.

## **Fair Competition**

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Tate & Lyle is committed to the principles of lawful and free competition, and to competing vigorously based strictly on the merits of our products and services. Trust is essential to our business success and to maintaining positive relationships with our customers, suppliers, and other stakeholders. Tate & Lyle does not condone the misrepresentation, concealment, or manipulation of privileged information, and forbids any understanding with competitors on pricing, market allocation, or other efforts to restrict competition. We abide by all applicable anti-trust and competition laws in all countries in which we operate.

## **Whistle-blowing**

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Tate & Lyle supports its employees and other legitimate stakeholders to come forward with any information concerning any actual or alleged breaches of this Code. No employee will suffer as a consequence of a good faith effort to bring to light evidence of non-compliance with the Code.

## **Implementation**

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Accountability for the implementation of the Code ultimately rests with the Chief Executive and the Board of Directors. Division leaders are expected to oversee the implementation of the Code, and this will include: communicating its content to employees and business partners; taking appropriate steps when needed to enhance its implementation including, when necessary, auditing and monitoring; developing corrective action plans to address deficiencies in implementation; and reporting annually on compliance with the Code.

## **Review**

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Tate & Lyle recognizes that the circumstances in which we operate around the world are constantly changing and because of this we will periodically review this Code to ensure that its content and implementation remain effective.

Tate & Lyle PLC  
March 2008



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[www.tateandlyle.com](http://www.tateandlyle.com)

## MISSION STATEMENT

Tate & Lyle Food and Industrial Ingredients Americas (TALFIIA), is committed to providing Quality products and services for our customers. A culture of continuous improvement is supported by strong management and by the measurement of results. We believe that:

- Quality creates value for our customers and shareholders.
- Quality is a key part of every job and business process at TALFIIA.
- Quality is key to customer preference.
- Quality is key to lower costs.

Creating value for our customers and shareholders requires understanding customer needs and expectations and understanding TALFIIA processes.

By practicing these Quality beliefs, TALFIIA will streamline processes, improve services, reduce variability, lower costs, increase customer satisfaction and create value for shareholders.

September 30, 2009

To Whom It May Concern:

Due to the nature of the products , routine microbiological testing is not performed on Citric Acid, Malic Acid, Fumaric Acid, Sodium Citrate and Potassium Citrate manufactured by Tate & Lyle Citric Acid. Results of past testing indicate that our acidulant products do not support microbial growth. These testing results are available upon request if required.

Respectfully,

*Faye Valentine*

Faye Valentine  
Technical Resource  
Tate & Lyle

standardreplies\microtesting



TATE & LYLE  
2200 East Eldorado Street  
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USA  
Tel 800-348-7414  
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February 8, 2016

TO WHOM IT MAY CONCERN:

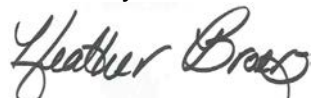
RE: Tate & Lyle Malic Acid, FCC

Tate & Lyle's Malic Acid, FCC is produced synthetically via the catalyzed hydrolysis of maleic anhydride at our Duluth, MN manufacturing facility. It is a racemic mixture of D&L Malic Acids. Malic Acid is not considered to be a "Natural" Or "Organic" product.

Furthermore, our Malic Acid, FCC is not derived from products or ingredients that have genetically modified organisms nor have been produced with genetically modified organisms. Tate & Lyle Malic Acid does not contain sewage sludge and has not been irradiated or been treated with Ethylene Oxide. Pesticide residues are also not applicable to this synthetic process.

If you need anything further please contact us.

Sincerely,



Heather Broers  
NOAM Customer Advocacy Lead  
Tate & Lyle

January 5, 2016

To Whom It May Concern:

Tate & Lyle produces all of its products within the guidelines established by the US Food and Drug Administration for food ingredients (Food Chemicals Codex) and the EU Directives on Food Safety. We continuously update our systems and processes to comply with the most current protocols to meet these guidelines. Designations such as "organic" are not, as yet, universally defined and therefore are not part of our production protocol.

Kindest regards,



Angela Maurer-Hyett  
Manager, Technical Resource  
Tate & Lyle





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2200 East Eldorado Street  
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January 5, 2016

TO WHOM IT MAY CONCERN:

RE: Malic Acid

This letter is in response to your inquiry on the ingredient statement for the above products.

Malic Acid Granular, Malic Acid Fine Granular and Malic Acid Powder are 100% Malic Acid.

Sincerely,

A handwritten signature in black ink that reads "Heather Broers".

Heather Broers  
Technical Resource  
Tate & Lyle



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January 1, 2016

TO WHOM IT MAY CONCERN:

RE: Citric Acid, Malic Acid, Fumaric Acid, Sodium Citrate and Potassium Citrate.

This letter is in response to your inquiry concerning the processing of acidulants and citrates from Tate and Lyle Citric Acid.

Due to the manufacturing process of our acidulants and citrates these products have not been irradiated, nor do they contain sewer sludge. However, Tate & Lyle purchases corn and cane sugar from the open market for the citrates and cannot guarantee sewer sludge has not been applied to the crop fields where these are grown.

Sincerely,

*Heather Broers*

Heather Broers  
Technical Resource  
Tate & Lyle

February 18<sup>th</sup>, 2016

To Whom It May Concern:

This is in response to your inquiry concerning GMO status of Malic and/or Fumaric Acid manufactured by Tate & Lyle Ingredients Americas, LLC.

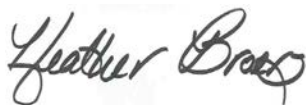
This product is not produced from plant material; therefore a statement about genetic engineering/modification status is not applicable.

Malic Acid and Fumaric Acid are manufactured using Maleic Anhydride as the starting material. Maleic Anhydride is a by-product of the petrochemical industry. This is a synthetic process.

The Malic and/or Fumaric Acid does not meet the definition of a genetically modified organism under EC regulations 1829 and 1830/2003 and therefore does not require labelling as GMO.

If you have any questions or require further information, please contact us at (800)348-7414.

Kindest Regards,



Heather Broers  
Tate & Lyle  
NOAM Customer Advocacy Lead



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March 8<sup>th</sup>, 2016

RE: Tate & Lyle Duluth manufacturing process

The following is a brief description of the process that Tate & Lyle Duluth, MN uses to manufacture our Malic Acid and/or Fumaric Acid.

Tate & Lyle Americas, LLC produces synthetic Fumaric Acid and D, L - Malic Acid. The conventional process is carried out using maleic anhydride as the starting material. Maleic Anhydride is a by-product of the petrochemical industry. This is a synthetic process.

If you have further questions please feel free to contact us.

Sincerely,

A handwritten signature in black ink that reads "Heather Broers". The signature is written in a cursive, flowing style.

Heather Broers  
NOAM Customer Advocacy Lead  
Tate & Lyle

**TYPICAL MICROBIOLOGICAL ANALYSIS  
RESULTS FOR  
TATE & LYLE CITRIC ACID PRODUCTS**

| <b>SAMPLE</b>            | <b>APC</b> | <b>COLIFORMS</b> | <b>YEAST</b> | <b>MOLD</b> | <b>SALMONELLA</b> |
|--------------------------|------------|------------------|--------------|-------------|-------------------|
| <b>CITRIC ACID</b>       | <10        | <0.3             | ND           | ND          | NEGATIVE          |
| <b>FUMARIC ACID</b>      | <10        | <0.3             | ND           | ND          | NEGATIVE          |
| <b>MALIC ACID</b>        | <10        | <0.3             | ND           | ND          | NEGATIVE          |
| <b>POTASSIUM CITRATE</b> | <10        | <0.3             | ND           | ND          | NEGATIVE          |
| <b>SODIUM CITRATE</b>    | <10        | <0.3             | ND           | ND          | NEGATIVE          |

Faye Valentine  
Technical Resource