



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.



**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

Date Approved
01/25/2016

Version
1.0

Document #
CBU.TS.AC.001

The information contained herein is correct as of the date of this document to the best of our knowledge. Any recommendations or suggestions are made without guarantee or representation as to results and are subject to change without notice. We suggest you evaluate any recommendations and suggestions independently. WE DISCLAIM ANY AND ALL WARRANTIES, WHETHER EXPRESS OR IMPLIED, AND SPECIFICALLY DISCLAIM THE IMPLIED WARRANTIES OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, AND NON-INFRINGEMENT. Our responsibility for claims arising from any claim for breach of warranty, negligence, or otherwise shall not include consequential, special, or incidental damages, and is limited to the purchase price of material purchased from us. None of the statements made here shall be construed as a grant, either express or implied, of any license under any patent held by Archer Daniels Midland Company ingredients.



**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

Date Approved
01/25/2016

Version
1.0

Document #
CBU.TS.AC.002

The information contained herein is correct as of the date of this document to the best of our knowledge. Any recommendations or suggestions are made without guarantee or representation as to results and are subject to change without notice. We suggest you evaluate any recommendations and suggestions independently. WE DISCLAIM ANY AND ALL WARRANTIES, WHETHER EXPRESS OR IMPLIED, AND SPECIFICALLY DISCLAIM THE IMPLIED WARRANTIES OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, AND NON-INFRINGEMENT. Our responsibility for claims arising from any claim for breach of warranty, negligence, or otherwise shall not include consequential, special, or incidental damages, and is limited to the purchase price of material purchased from us. None of the statements made here shall be construed as a grant, either express or implied, of any license under any patent held by Archer Daniels Midland Company ingredients.



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

The information contained herein is correct as of the date of this document to the best of our knowledge. Any recommendations or suggestions are made without guarantee or representation as to results and are subject to change without notice. We suggest you evaluate any recommendations and suggestions independently. WE DISCLAIM ANY AND ALL WARRANTIES, WHETHER EXPRESS OR IMPLIED, AND SPECIFICALLY DISCLAIM THE IMPLIED WARRANTIES OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, AND NON-INFRINGEMENT. Our responsibility for claims arising from any claim for breach of warranty, negligence, or otherwise shall not include consequential, special, or incidental damages, and is limited to the purchase price of material purchased from us. None of the statements made here shall be construed as a grant, either express or implied, of any license under any patent held by Archer Daniels Midland Company ingredients.



**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.

Date Approved
2017-10-31

Version
2.0

Document #
CBU.TS.MISC.053

The information contained herein is correct as of the date of this document to the best of our knowledge. Any recommendations or suggestions are made without guarantee or representation as to results and are subject to change without notice. We suggest you evaluate any recommendations and suggestions independently. WE DISCLAIM ANY AND ALL WARRANTIES, WHETHER EXPRESS OR IMPLIED, AND SPECIFICALLY DISCLAIM THE IMPLIED WARRANTIES OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, AND NON-INFRINGEMENT. Our responsibility for claims arising from any claim for breach of warranty, negligence, or otherwise shall not include consequential, special, or incidental damages, and is limited to the purchase price of material purchased from us. None of the statements made here shall be construed as a grant, either express or implied, of any license under any patent held by Archer Daniels Midland Company ingredients.



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.

Date Approved
2017-11-06

Version
2.0

Document #
CBU.TS.MISC.030

The information contained herein is correct as of the date of this document to the best of our knowledge. Any recommendations or suggestions are made without guarantee or representation as to results and are subject to change without notice. We suggest you evaluate any recommendations and suggestions independently. WE DISCLAIM ANY AND ALL WARRANTIES, WHETHER EXPRESS OR IMPLIED, AND SPECIFICALLY DISCLAIM THE IMPLIED WARRANTIES OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, AND NON-INFRINGEMENT. Our responsibility for claims arising from any claim for breach of warranty, negligence, or otherwise shall not include consequential, special, or incidental damages, and is limited to the purchase price of material purchased from us. None of the statements made here shall be construed as a grant, either express or implied, of any license under any patent held by Archer Daniels Midland Company ingredients.



Sodium Citrate Dihydrate Elemental Impurities Statement

As part of our continued effort to provide customers with information on compliance to USP-NF monograph specifications, we have tested ADM Sodium Citrate Dihydrate for the Elemental Impurities listed in USP <232>. We selected a representative number of lots as our sample data set and submitted samples to our ADM Analytical Research Laboratory. Results were achieved using Inductively Coupled Plasma-Mass Spectrometry (ICP-MS) following AOAC 2013.06 methodology. In the table below, the elemental impurities established in USP <232> are listed. You will find elements that may be present in our product and the average concentration observed.

ADM plans to conduct testing on a quarterly basis for Sodium Citrate Dihydrate as part of our continued effort to better understand our process as it relates to Elemental Impurities and to provide customers assurance that our products will be compliant with USP <232>.

| Elemental Impurity | | Class | Likely to be Present | | | Permitted Inhalation Concentration USP <232> Table 3* | If Known, Please Identify the Expected Concentration /Units (or Range)* |
|---------------------|----|-------|---|--|----------------------------------|---|---|
| | | | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | Unknown <input type="checkbox"/> | | |
| Arsenic (inorganic) | As | 1 | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | Unknown <input type="checkbox"/> | 0.2 µg/g | 5 µg/kg |
| Cadmium | Cd | 1 | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | Unknown <input type="checkbox"/> | 0.2 µg/g | |
| Mercury (inorganic) | Hg | 1 | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | Unknown <input type="checkbox"/> | 0.1 µg/g | |
| Lead | Pb | 1 | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | Unknown <input type="checkbox"/> | 0.5 µg/g | |
| Cobalt | Co | 2A | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | Unknown <input type="checkbox"/> | 0.3 µg/g | |
| Nickel | Ni | 2A | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | Unknown <input type="checkbox"/> | 0.5 µg/g | 105 µg/kg |
| Vanadium | V | 2A | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | Unknown <input type="checkbox"/> | 0.1 µg/g | |
| Silver | Ag | 2B | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | Unknown <input type="checkbox"/> | 0.7 µg/g | |
| Gold | Au | 2B | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | Unknown <input type="checkbox"/> | 0.1 µg/g | |
| Iridium | Ir | 2B | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | Unknown <input type="checkbox"/> | 0.1 µg/g | |
| Osmium | Os | 2B | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | Unknown <input type="checkbox"/> | 0.1 µg/g | |
| Palladium | Pd | 2B | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | Unknown <input type="checkbox"/> | 0.1 µg/g | |
| Platinum | Pt | 2B | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | Unknown <input type="checkbox"/> | 0.1 µg/g | |
| Rhodium | Rh | 2B | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | Unknown <input type="checkbox"/> | 0.1 µg/g | |
| Ruthenium | Ru | 2B | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | Unknown <input type="checkbox"/> | 0.1 µg/g | |
| Selenium | Se | 2B | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | Unknown <input type="checkbox"/> | 13 µg/g | |
| Thallium | Tl | 2B | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | Unknown <input type="checkbox"/> | 0.8 µg/g | |
| Barium | Ba | 3 | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | Unknown <input type="checkbox"/> | 30 µg/g | 165 µg/kg |
| Chromium | Cr | 3 | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | Unknown <input type="checkbox"/> | 0.3 µg/g | 275 µg/kg |
| Copper | Cu | 3 | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | Unknown <input type="checkbox"/> | 3.0 µg/g | 15 µg/kg |
| Lithium | Li | 3 | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | Unknown <input type="checkbox"/> | 2.5 µg/g | |
| Molybdenum | Mo | 3 | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | Unknown <input type="checkbox"/> | 1.0 µg/g | 50 µg/kg |
| Antimony | Sb | 3 | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | Unknown <input type="checkbox"/> | 2.0 µg/g | |
| Tin | Sn | 3 | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | Unknown <input type="checkbox"/> | 6.0 µg/g | 13 µg/kg |

*Please note that the Permitted Inhalation concentrations are given in parts per million (µg/g) values and the known/expected concentrations are given in parts per billion (µg/kg) values. Table 3 in USP 41 lists the permitted concentrations in oral, parenteral and inhalation applications. The lowest permitted concentration given in USP <232> Table 3 is in the Inhalation category.

CUSTOMS - TRADE PARTNERSHIP AGAINST TERRORISM



*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.

[Signature]

Commissioner



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

Date Approved
12/29/2014

Version
1.0

Document #
CBU.TS.MISC.006

The information contained herein is correct as of the date of this document to the best of our knowledge. Any recommendations or suggestions are made without guarantee or representation as to results and are subject to change without notice. We suggest you evaluate any recommendations and suggestions independently. WE DISCLAIM ANY AND ALL WARRANTIES, WHETHER EXPRESS OR IMPLIED, AND SPECIFICALLY DISCLAIM THE IMPLIED WARRANTIES OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, AND NON-INFRINGEMENT. Our responsibility for claims arising from any claim for breach of warranty, negligence, or otherwise shall not include consequential, special, or incidental damages, and is limited to the purchase price of material purchased from us. None of the statements made here shall be construed as a grant, either express or implied, of any license under any patent held by Archer Daniels Midland Company ingredients.



Residual Solvents Statement

This statement certifies that, based on our knowledge of the manufacturing process and our storage, shipping and handling procedures, the products listed below comply with the established standard for Residual Solvents as set forth in the current USP.

Sweeteners and Food Additives

No Class 1, 2, 3, or non-ICH solvents are used in the manufacture of these products. Due to possible organic acid and other carbohydrate reactions that naturally occur in sugars, only Class 3 or non-ICH solvents may be present below 0.1%.

| | |
|--|--|
| Allulose (JustSweet™) | Liquid Citric Acid-Food and Industrial Grade (Citrosol®) |
| Citric Acid Anhydrous | Maltodextrin (Clintose®) |
| Corn Syrup-Liquid and Solids | Potassium Citrate |
| Corn Starch-Food and Industrial Grade | Resistant Maltodextrins (Fibersol®) |
| Crystalline Dextrose (Clintose®) | Sodium Citrate-Anhydrous and Dihydrate |
| Crystalline Fructose (CornSweet®) | Sucrose*-Dry, Liquid and Invert |
| High Fructose Corn Syrups (CornSweet®) | Sweetener Blends |

**Sourced from sugarcane and sugar beets*

Sorbitol Products

Solvents are not used in the manufacturing process of ADM Sorbitol products as listed below. However, Ethylene Glycol, a Class 2 solvent, may be formed in the manufacturing process. Residual ethylene glycol levels in finished Sorbitol products are below the USP Option 1 limit.

| | |
|----------------|--|
| Maltitol Syrup | Sorbitol-Liquid, Dry and Non-Crystallizing |
|----------------|--|

NovaXan™ Products

Solvents are not used in the manufacturing process of ADM NovaXan™ nor are they likely to be present in the finished product. Isopropyl alcohol (2-Propanol), a Class 3 solvent, is used in the recovery process and residuals are within the limits of the USP monograph for Xanthan Gum (<750 ppm).

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

ADM Technical Services

Date Approved
03/02/2016

Version
2.0

Document #
CBU.TS.MISC.042

The information contained herein is correct as of the date of this document to the best of our knowledge. Any recommendations or suggestions are made without guarantee or representation as to results and are subject to change without notice. We suggest you evaluate any recommendations and suggestions independently. WE DISCLAIM ANY AND ALL WARRANTIES, WHETHER EXPRESS OR IMPLIED, AND SPECIFICALLY DISCLAIM THE IMPLIED WARRANTIES OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, AND NON-INFRINGEMENT. Our responsibility for claims arising from any claim for breach of warranty, negligence, or otherwise shall not include consequential, special, or incidental damages, and is limited to the purchase price of material purchased from us. None of the statements made here shall be construed as a grant, either express or implied, of any license under any patent held by Archer Daniels Midland Company ingredients.



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
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

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

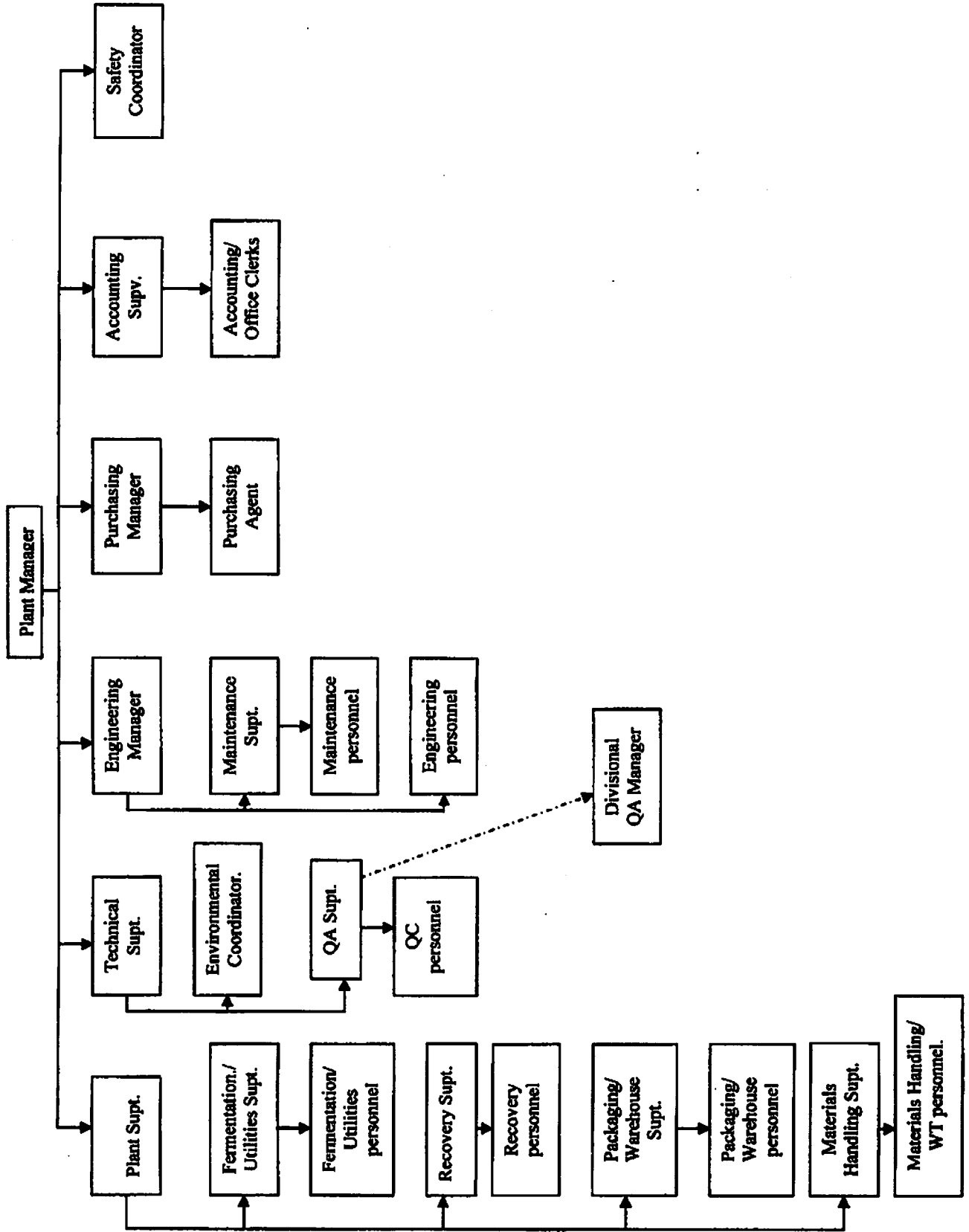
Date Approved
06/23/2015

Version
1.0

Document #
CBU.TS.MISC.020

The information contained herein is correct as of the date of this document to the best of our knowledge. Any recommendations or suggestions are made without guarantee or representation as to results and are subject to change without notice. We suggest you evaluate any recommendations and suggestions independently. WE DISCLAIM ANY AND ALL WARRANTIES, WHETHER EXPRESS OR IMPLIED, AND SPECIFICALLY DISCLAIM THE IMPLIED WARRANTIES OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, AND NON-INFRINGEMENT. Our responsibility for claims arising from any claim for breach of warranty, negligence, or otherwise shall not include consequential, special, or incidental damages, and is limited to the purchase price of material purchased from us. None of the statements made here shall be construed as a grant, either express or implied, of any license under any patent held by Archer Daniels Midland Company ingredients.

ADM SOUTHPORT QUALITY SYSTEMS ORGANIZATIONAL CHART



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**