

October 1, 2015

Dear Customer:

Please find our batch code interpretation below.

Batch code numbers are listed on our CoA's - e.g. 3000017976010

Batch code numbers are a 10 digit system generated unique code. For packaged goods the last 3 additional numbers refer to the pallet number. This number is also located at the bottom of the package label under the bar code.

Please make reference to the batch code number should you need to communicate any information to Niacet regarding any of our products.

Sincerely,
NIACET CORPORATION

Salvatore J. D'Angelo



Niacet's Propionate, Acetate and Lactylate products do not contain Gluten.

Sincerely,

NIACET CORPORATION

Salvatore J. D'Angelo



Sodium Stearoyl Lactylate Ingredient List

100% Sodium Stearoyl Lactylate

Sincerely,

NIACET CORPORATION

Salvatore J. D'Angelo



To Whom It May Concern:

Re: Product Statement

Please be advised that Niacet Corporation Stearoyl Lactylate Products are manufactured from natural and synthetic chemical raw materials. They are packaged in materials suitable for food use. They contain no Pesticides, BSE, Alfa Toxin, Gluten, Residual Solvents, Diacetyl or Melamine. These products may contain trace amounts of soy bean oil which is GMO. These products are partially derived from vegetable oil and contain no other potential allergens.

Niacet Stearoyl Lactylate Products are sifted prior to packaging and meet the Guidelines of AIB Operation standards.

The shelf life of these products is generally regarded to be indefinite, however, we recommend a re-test after 2 years from date of manufacture to ensure conformance to specifications. Please store at temperature less than 90° F in a dry protected environment.

FDA Bio No. 19691631666

Sincerely,

NIACET CORPORATION

Salvatore J. D'Angelo



Re: Product Source Statement SSL/ CSL

To Whom It May Concern:

Please be advised that Niacet Corporation Stearoyl Lactylate Products are made from Soy oil derived Stearic acid, synthetically derived Lactic acid, and synthetically derived Caustic Soda, or mineral derived Calcium Hydroxide.

Sincerely,

Salvatore J. D'Angelo

Salvatore J. D'Angelo Niacet Corporation Manager Quality Assurance & Regulatory Affairs



August 1, 2016

To Whom It May Concern:

Re: Product Statement

Please be advised that Niacet Corporation Stearoyl Lactylate Products are manufactured from natural and synthetic chemical raw materials. They are packaged in materials suitable for food use. They contain no Pesticides, BSE, Alfa Toxin, Gluten, Residual Solvents, Diacetyl or Melamine and is Non-Irradiated. These products are made using Stearic acid which may contain a trace amount of soy bean oil which is GMO. Current industry consensus is that GM DNA, or protein, in the raw material stream is denatured, degraded, or removed through refining by successive processing which includes physical separation, heating, purification, and filtration. As a result, GM DNA, or protein, cannot be detected in these highly refined products. These products contain no other potential allergens.

Niacet Stearoyl Lactylate Products are sifted prior to packaging and meet the Guidelines of AIB Operation standards.

The shelf life of these products is generally regarded to be indefinite, however, we recommend a re-test after 2 years from date of manufacture to ensure conformance to specifications. Please store at temperature less than 90° F in a dry protected environment.

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NIACET CORPORATION

Salvatore J. D'Angelo

4.1 <u>INTRODUCTION:</u>

The following information provides the essence of what Good Manufacturing Practices (GMP) are all about; i.e., conducting manufacturing operations in such a manner that protects all products produced from contamination or from the potential of becoming contaminated.

To meet these principles, it will take the interest, cooperation, and alertness of all employees. Operators, shippers, maintenance personnel, managers, and staff must work together to assure that GMP requirements are met.

4.2 OPERATING PROCEDURES:

Each production unit shall maintain standard operating procedures (SOP's). Operators shall be familiar with these instructions and observe the requirements thereof. These procedures should include specific reaction details (e.g. quantities, control parameters, etc.), operating instructions of major equipment/systems, process flow diagrams, raw material handling instructions, and product specifications. Revisions should be issued periodically reflecting any changes or improvements in the daily operating procedures.

4.3 SAFETY POLICIES AND PROCEDURES:

Specific safety policies and procedures shall be maintained to ensure the safe conduct of all employees. Each individual has an obligation to comply with these policies and procedures to provide the maximum, reasonable level of safety and health within the plant.

Appendix 4.0 contains plant safety requirements, policies and procedures.

4.4 PROCESS AND CONTROLS:

All operations should comply with adequate operating practices to guard against product contamination.

Appropriate quality control measures shall be employed to determine that raw materials and products are suitable for their intended usage.

Raw materials, other ingredients and rework material should be properly labeled and held in vessels (with lids) suitable to protect against contamination.

All equipment used to handle, process or hold raw materials, work-in-process, or finished products should be constructed in such a manner that protects against contamination.

Contaminated product or raw materials shall be disposed of in a manner that does not affect other materials.

4.0 - GOOD MANUFACTURING PRACTICES

4.5 CLEANING OPERATIONS:

Plant facilities should be maintained in a good condition to prevent product contamination.

Cleaning substances used should be free of contamination, safe for use, and adequate to do the job. Effective measures to guard against product contamination by pests should be taken.

Product-contact surfaces and work implements should be cleansed as necessary to prevent product contamination.

4.6 PEST CONTROL:

The pest control program shall be administered by the Regulatory Department. A pest control contractor licensed by the State of New York shall perform the pest control duties. The contractor shall use Catchalls, Glue Boards, and Exterior Bait stations to control pests. The contractor shall report his findings to the Production Coordinator on a monthly basis. The Regulatory Department will use this information to assess the pest control status.

4.7 WAREHOUSING AND DISTRIBUTION:

Storage and transportation of finished products should be done under conditions that protect product from physical, chemical, or pest contamination.

Approved products should be properly identified and stored away from rework or contaminated material (also properly labeled).

4.8 GLASS & BRITTLE PLASTIC

Niacet Corporation maintains a Glass and Brittle Plastics Policy that is consistent with Good Manufacturing Practices. The purpose of the program is to control any risks that are associated with the use of glass and brittle plastics that cannot be effectively protected or replaced with alternative materials, and are therefore required in the plant environment. Such items may include thermometers, site glass, windows, signal lights, glassware used for chemical tests, etc.

Niacet's policy includes the following elements:

- *Identification of glass and brittle plastic materials in the plant.*
- *Elimination or adequate protection of materials.*
- Inventory and inspection of materials that cannot be protected.
- Action plan to handle any breakage that may occur
- Prevention of employees or contractors bringing materials into our facility
- *Universal authority for reporting glass/brittle plastic breakage incidents.*
- Defined authority for managing the program
- Audit and review of the program for effectiveness during Unit meetings.

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- Audit and review of the program for effectiveness during Unit meetings.

4.9 CLOTHING & JEWELRY POLICY

- 1.) Safety shoes with steel toe or equivalent protection must be worn while working in the plant.
- 2.) Hard hat, Safety glasses with side shields, Hearing protection, Respiratory protection, and any other applicable PPE must be worn in designated areas or when performing designated activities. Safety glasses with dark or tinted lenses are not permitted indoors or in low light conditions.
- 3.) Facial hair (such as a beard), and long side burns are not permitted on employees who work in the plant where such conditions interfere with proper fit of a respirator face piece, or presents a food safety concern, Long hair must be maintained in a safe manner to avoid an entanglement hazard, or presents a food safety concern.
- 4.) Protective clothing issued by Niacet shall be worn at work and must be changed regularly. Clean uniforms must be kept separate from street clothes. Protective clothing such as uniforms must not be worn off site and kept in good condition. Soiled clothing and hard hats, loose clothing, shorts, sleeveless shirts, ripped or torn clothing is prohibited.
- 5.) Jewelry with the exception of wristwatches and rings without stones are not permitted in production areas.
- 6.) It is prohibited to carry writing implements behind the ear or anywhere else where they may fall.



August 31, 2015

Dear Customer:

In a continuing effort to improve our management systems, Niacet will be upgrading to a new SAP version in Q4 2015. We are excited about the many features we will gain with the new software version. We do not anticipate any negative effects for our customers; however, we would like to take this opportunity to inform you of some changes that will occur.

- 1. All item/material numbers will be re-numbered in the new system. We will reference the old item numbers in the master data of the new SAP system, allowing us the option to reference the old item numbers for product manufactured prior to the switch.
- 2. The current lot code will be replaced with a computer generated sequential 10 digit batch number. Current inventory at the time of cut over will carry a reference to the old lot number, allowing forward traceability to the point of sale. All history in the old system will be maintained to allow backward traceability to raw materials and packaging.
- 3. There will be changes in layout and appearance to the present documents provided, including invoices, order acknowledgments and certificate of analysis.

Should you have any concerns or questions, please feel free to address them through our customer service team at niacet.com or 800-828-1207. We at Niacet appreciate your business. We will continue to provide World-Class Quality and maintain a World-Class Reputation.

Sincerely,

NIACET CORPORATION

Michael R. Bowers

Michael R. Bowers Director, Sales and Marketing



To Whom It May Concern,

Niacet Corporation hereby declares that in all production and storage locations, pest control is in place. Pest control is performed by an external company once per month.

Sincerely,

NIACET CORPORATION

Salvatore J. D'Angelo



March 25, 2015

Niacet Corp. 400 47th street Niagara Falls, NY, USA 14304

Attn: Scott Barnum

Subject: <u>LETTER OF NON-OBJECTION</u>

We, Gelpac Rouville Packaging Solution registered with the CFIA under the number E235 certifies that all bags manufactured for Niacet Corp. are of Canada/USA origin and produced using raw materials that are safe and approved for product use in contact with food for human consumption as per FDA Regulations.

The paper used is compliant to FDA as per 21 CFR 176.170 and 176.180. The polyethylene film is compliant to FDA as per 21 CFR 177.1520.

Gelpac Rouville Packaging Solution guarantee extends to all bags already delivered, bags in process and all future shipment of bags.

Frédéric Rousseau, Chemist

Corporate Quality, R&D, Purchasing, Health & Safety Manager frousseau@gelpac.com www.gelpac.com



To Whom It May Concern:

Please be advised that Niacet Acetate and Propionate products are anti microbial by nature and do not support microbiological growth.

Sincerely,

NIACET CORPORATION

Salvatore J. D'Angelo