

# 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.*

*Albert C. Bonner*  
\_\_\_\_\_  
**Commissioner**



**Brent D. Flickinger, PhD**  
Vice President, Product Quality,  
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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 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



## **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  
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website: www.adm.com

## To Whom It May Concern

### Lot Numbering System for NovaXan™ and OptiXan™ Xanthan Gum

Per your request, please find the description of ADM's Lot Numbering System for Xanthan Gum product lines.

#### NovaXan:

##### Product Coding: 110102XAA

11	=	Production Year
01	=	Month
02	=	Day
X	=	Xanthan
A	=	Product line (NovaXan)
A	=	Batch number for that day

#### OptiXan:

##### Product Coding: 110102XCA

11	=	Production Year
01	=	Month
02	=	Day
X	=	Xanthan
C	=	Product line (OptiXan)
A	=	Batch number for that day

Sincerely,  
ADM Technical Services

XA-062-110102

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## **USP <467> Residual Solvents in NovaXan™ Product Line**

To Whom It May Concern:

ADM NovaXan™ product line are produced by an aqueous fermentation and recovery process. No USP <467> Class 1, Class 2 solvents are used in the manufacture of these products nor are they likely to be present in the finished products. Isopropyl alcohol (2-Propanol) which is a class 3 solvent is used in the recovery of the gum and is within the limits of the USP monograph for xanthan gum of less than 750 ppm.

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

Sincerely,  
ADM Technical Service

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 or other parties. Customers are responsible for obtaining any licenses or other rights that may be necessary to make, use, or sell products containing Archer Daniels Midland Company ingredients.





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## 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

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 or other parties. Customers are responsible for obtaining any licenses or other rights that may be necessary to make, use, or sell products containing Archer Daniels Midland Company ingredients.

MI-014-110511



## Archer Daniels Midland Company Corn Business Unit

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### 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

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1.0

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CBU.TS.MISC.074

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Fax: 217/451-2473

Date:03/17/11

TO WHOM IT MAY CONCERN

This is in regard to your request for a "natural statement" for **Xanthan Gum**. There is no formal definition for the term "natural" except as it is defined for "natural flavors" under 21 CFR 101.22. As an ingredient not fitting the definition of a "flavor", we can state that the bacterium used to produce ADM xanthan gum, **Xanthomonas campestris**, is found in nature on the leaf surfaces of green vegetables, particularly the **brassica** family.

NovaXan™ (Xanthan Gum) can be found in the National Organic Program, filed under 7 CFR 205.605 , entitled, "Nonagricultural substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic".

NovaXan™ is not produced using any sewage sludge streams. NovaXan™ is also not irradiated at anytime during or after production.

Sincerely,

*Michael L. Rambo*

Michael L. Rambo  
ADM Technical Services  
Specialty Food Division

110317mlr