



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
4666 Faries Parkway Decatur, IL 62526
Phone: 217/451/4049 fax: 217/451-2473
Website: www.adm.com

April 16, 2014

Dear ADM Business Partner,

Archer Daniels Midland Co. (ADM) is pleased to announce its validation membership in the Customs –Trade Partnership Against Terrorism (C-TPAT) security initiative. ADM is committed to the continuous development of global supply chain security, and subscribes to the CTPAT ‘Minimum Security Criteria’.

As stated in the C-TPAT ‘Minimum Security Criteria’, Certified C-TPAT partners need to verify the participation status of other eligible C-TPAT business partners to verify the participation status of other consenting certified C-TPAT Partners. Each party must have consented to the release of their company name among the C-TPAT membership. The SVI is the point of electronic access to verify the C-TPAT status of another Status Verification Interface Participant (SVIP). Access to the C-TPAT SVI is now found in the C-TPAT Security Link Portal.

ADM has been assigned the following SVI for Verification of our C-TPAT participation:
f66a50ed-5a41-49a5-b37d-70b429008078

Please utilize the aforementioned SVI, querying it on CBP’s ‘Web Portal’ located at
<https://ctpat.cbp.dhs.gov/Login.aspx>

ADM maintains its approach to actively encourage our suppliers, carriers, vendors, and all other business partners to engage in safe and secure supply chain security practices, consistent with CBP’s ‘Minimum Security Criteria’. ADM desires to widen global supply chain security by creating a broad partner base. If your company would submit its SVI to ADM, it will be added to our growing C-TPAT partner register.

Thank you for your genuine efforts to mitigate the risks associated with the global supply chain.

Sincerely,
Stephen K. Stanner
Senior Security Specialist
Archer Daniels Midland Company
217-451-4049
steve.stanner@adm.com



ADM Technical Services
4666 Faries Parkway
Decatur, IL 62526
T 217.424.5200

Soybean Lecithin - National Organic Program

Pursuant to section 205.605b(20) and section 205.606(4) of the National Organic Program, Agricultural Marketing Service of the USDA, the following ADM Soy Lecithin products are considered as suitable ingredients in or on processed products labeled as organic or made with organic ingredients when produced from standard oilseeds that have not been genetically modified:

- Yelkin® series products (T, TS, SS, DS, and Gold)
- Beakin® series products LV1 and LV3
- Capsulec® series products
- Ultralec® series deoiled lecithin products

Please refer to ADM's GMO statement for soy lecithin for clarification of the GMO status of these products. To meet the requirement on the NOP the above lecithin products must be manufactured under ADM's Identity Preserved (IP) program for soy ingredients. These ingredients are not irradiated nor do they have any contact with sewage sludge.

Reference: National Organic Program, Part 205, December, 2000 (as amended on March 6, 2007, Federal Register 72, No. 43).

Sincerely,
ADM Technical Services
Specialty Food Ingredients Division

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May 11, 2010



REACH and Substance of Very High Concern Status – ADM Lecithin

ADM Lecithin products are native lecithin; a substance recognized to be of low hazard as indicated by its listing in Annex IV of EU Regulation 1907/2006 and subsequent amendments on REACH, as “sufficient information is known about these substances that they are considered to cause minimum risk because of their intrinsic properties” (Article 2.7(a) REACH). Lecithin (EINECS – Nr. 232-307-2; CAS – Nr. 8002-43-5) is on this list and is exempted from the obligation to register independent of its use.

Lecithins are therefore not SVHC’s or candidate SVHCs. Accordingly, we have not tested our lecithin for these compounds. While we have not tested for them we do not believe that ADM Lecithin contain detectable levels of any SVHCs or candidate SVHCs.

ADM Lecithin product exempted from the registration: Adlec®, Yelkin® and Ultralec®.

Sincerely,
ADM Quality Assurance

Date Approved
January 9, 2017

Version
2.0

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Archer Daniels Midland Company
ADM Foods and Wellness Division
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1-800-637-5843

December 20, 2013

**Metal results for lecithin produced in the ADM De-oiled Lecithin Plant at
3883 Faries Parkway, Decatur, IL 62526.**

Once a year, ADM sends lecithin samples to a consultant lab for the following heavy metal analysis: mercury, cadmium, lead and arsenic. The latest results (Sept. 26, 2013) were “none detected” and the tests were conducted by Eurofins Scientific, Inc., Des Moines, IA.

Mwd-ICP-MS is used for metal analysis and the detection limits are as follows: mercury = 0.01 ppm, cadmium = 0.01 ppm, lead = 0.02 ppm and arsenic = 0.02 ppm.

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

Kindest Regards,

ADM Technical Services

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April 7, 2015

Residual Solvent Statement for ADM Soy Lecithin Products

It is important to note that ADM Lecithin products are not sold as USP grade. These products are manufactured to U.S. Food Chemical Codex specifications and primarily sold as food ingredients. USP 35 General Chapter <467> Residual Solvents defines residual solvents as organic volatile chemicals used or produced in the manufacture of drug substances or excipients, or in the preparation of drug products. Furthermore, this chapter states that it is only necessary to test for those solvents used in the production of, or resulting from the production of, the substance, excipients or products. Due to previous results which indicated very low levels of residual solvent ADM fluid lecithin is subjected to annual residual solvent testing. Each lot of de-oiled lecithin is tested for residual solvent.

Archer Daniels Midland's fluid and de-oiled lecithin products are manufactured through processes which utilize hexane – the same solvent used to remove the crude soybean oil from the crushed soybeans. Therefore, only the Class 2 solvent hexane is likely to be present. No other organic solvents are likely to be present. Residual solvent testing to-date has shown the residual solvent level to be well below the 290 ppm maximum concentration listed in <467> which would necessitate quantification and reporting.

Best regards,

A handwritten signature in black ink that reads "Doris A. Dougherty".

Doris Dougherty
ADM Technical Services Representative
Email: doris.dougherty@adm.com

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