

PRODUCT INFORMATION FILE – POTATO STARCH

Contents

1	Product Information	3
1.1	Product Description	3
1.2	Ingredient Statement	3
1.3	Lot Numbering System	3
1.4	Packaging Compliance	4
1.5	Residual / Organic Solvents	4
1.6	Chlorpyrifos	4
1.7	Melamine.....	4
1.8	Palm Oil.....	4
1.9	Sifting.....	4
1.10	Partially Hydrogenated Oils	4
2	Regulatory / Legal Requirements	5
2.1	Regulatory Compliance.....	5
2.2	Allergen & Sensitizing Agent Information	5
2.3	Free from Gluten	6
2.4	Irradiation / Sewage Sludge.....	6
2.5	Ethylene Oxide.....	6
2.6	Animal Derivatives.....	6
2.7	BSE / TSE Statement	6
2.8	Nanotechnology	6
2.9	Proposition 65	6
2.10	Pesticide, Mycotoxins and Heavy Metals	7
2.11	WADA, NFL / NFLPA and NSF Prohibited Ingredients.....	7
2.12	Bisphenol A.....	7
2.13	REACH Status	7
2.14	Animal Testing	7
2.15	California Transparency in Supply Chains Act 2010.....	7
2.16	Conflict Minerals.....	8
2.17	FDA Facility Registration	8

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Note: Nothing herein is intended as legal or regulatory advice, nor should you rely on the information contained in this position statement, which is presented solely for your independent consideration, review, and verification. The information is presented in good faith as of the date set forth herein and Ingredion Incorporated assumes no obligation to update this position statement. Ingredion Incorporated makes no representations or warranties, and shall have no liability, regarding this position statement or your use of the information contained herein.

2.18	FSMA (Food Safety Modernization Act) Compliance.....	8
2.19	Bioengineered (BE)	8
2.20	No GE Audits.....	8
3	Food Safety and Quality Programs	9
3.1	Food Safety Programs.....	9
3.2	Foreign Supplier Verification Program (FSVP)	9
3.3	Recall Policy / Traceability Exercises.....	9
3.4	Supplier Approval Program / Supplier Code of Conduct	10
3.5	Change Management	10
4	Other	11
4.1	Business Continuity	11
4.2	Statement of Code of Conduct	11
4.3	Sustainability	11
4.4	Document Control Program	12

1 PRODUCT INFORMATION

1.1 PRODUCT DESCRIPTION

This Product Information File applies to the following food potato starches:

N-HANCE® 59 – 07730402	PENNOVO® 00 - 06170400
NOVATION® 1600 - 34121404	PENPLUS® 10-500A - 06840401
NOVATION® 1900 - 34121403	PENPLUS® 40 - 12140410
NOVATION® 6600 - 34281400	PENPLUS® 47 - 12150408
PENBIND® 100 - 06450403	PENPLUS® 300 - 12150406
PENBIND® 130 - 06430400	PENPLUS® 2100 – 12150411
PENBIND® 140 - 06820400	PENPLUS® 2140 - 12150405
PENBIND® 170 - 06450401	PENPLUS® MG - 12110401
PENBIND® 180 - 06440400	PENPURE® 10 – 04400403
PENBIND® 190 - 06420401	PENPURE® 10 – 70000834
PENBIND® 196 - 06400401	PENPURE® 10L – 04400407
PENBIND® 800 - 05090400	PENPURE® 60 - 04400404
PENBIND® 850 - 05690404	PENPURE® 65 – 12100407
PENBIND® 850 - 05690400	PENPURE® 85D - 12100410
PENBIND® 851 - 05690401	PENPURE® UM – 12100405
PENBIND® 853 - 05690402	PENTECH® 7000 - 31471404
PENBIND® 1000 - 06850403	PENTECH® 7000U – 70000556
PENBIND® 1015 – 06840404	PENTECH® 8500 - 31471400
PENBIND® 1040 - 06810403	PENTEXTURE® - 12140408
PENBIND® 1381 - 06430401	PRECISA® 604 – 05590405
PENBIND® 1397 - 06840400	ULTRA-TEX 1311 – 70000090
PENCLING® 208 – 05590403	VERSAFIBE™ 1485 Dietary Fiber - 06400406
PENCLING® 320 – 06450402	VERSAFIBE™ 1490 Dietary Fiber - 06400400
PENCLING® 530 - 06840402	
PENCLING® 550 – 06840403	
PENCLING® 596 - 06810401	
PENCLING® 597 - 06810402	
PENCLING® 598 - 06830400	

1.2 INGREDIENT STATEMENT

Potato Starch

1.3 LOT NUMBERING SYSTEM

See separate Lot/Batch Code Statement.

1.4 PACKAGING COMPLIANCE

We are pleased to affirm that all packaging material used by Ingredion Incorporated complies with U.S. Food, Drug, and Cosmetic Act regulations for food contact packaging.

1.5 RESIDUAL / ORGANIC SOLVENTS

We have reviewed our potato starch products and can affirm that residual / organic solvents are not used in the manufacture of our potato starch products intended for use in food or pharmaceuticals.

1.6 CHLORPYRIFOS

Ingredion Inc. companies, at our global manufacturing operations, perform routine analyses on either in-coming raw materials or finished products on an audit basis. Chlorpyrifos is included in these residue surveys and results are historically not detected (using <0.01 ppm as Limit of Detection).

Further, we have been working with our supply chain partners to ensure our raw material and purchased ingredient suppliers are aware of the new USA EPA guidance revoking the tolerance limits for chlorpyrifos and are aware that this pesticide is banned for use in products sold into the US effective February 22, 2022. Based on this analysis we can advise that food products supplied to you by Ingredion Inc. will meet the 2021 USA EPA Final Tolerance Rule for Chlorpyrifos.

1.7 MELAMINE

Ingredion Incorporated does not intentionally add melamine or melamine-related compounds during our manufacturing processes.

1.8 PALM OIL

We are pleased to affirm that our potato starch products are not manufactured using palm oils.

1.9 SIFTING

We are pleased to affirm that our potato starch products are sifted, screened, or sieved prior to packaging as part of the HACCP or food safety program.

1.10 PARTIALLY HYDROGENATED OILS

We can affirm that no partially hydrogenated oils are used in the production of our potato starch products.

2 REGULATORY / LEGAL REQUIREMENTS

2.1 REGULATORY COMPLIANCE

United States

All products meet applicable FCC (Food Chemical Codex) requirements and are suitable for food grade use. Please see our Technical Data Sheets for labelling information and additional details.

Canada

All products meet the applicable CFDA Regulation. Please see our Technical Data Sheets for standard of identity and labelling information

2.2 ALLERGEN & SENSITIZING AGENT INFORMATION

The table provides information concerning the presence of allergens and sensitizing agents in potato starch products:

Material	Contained as ingredient?
Milk ^{1,2,3}	No
Eggs ^{1,2,3}	No
Fish ^{1,2,3}	No
Crustacean shellfish ^{1,2,3}	No
Molluscs ^{2,3}	No
Tree Nuts ^{1,2,3}	No
Peanuts ^{1,2,3}	No
Legumes	No
Soybeans ^{1,2,3}	No
Wheat ^{1,2}	No
Gluten-containing Grains ^{2,3,4}	No
Sesame seeds ^{1,2,3}	No
Celery ³	No
Mustard ³	No
Lupin ³	No
Sulfites ^{2,3}	No
Monosodium glutamate (MSG)	No
Hydrolyzed vegetable protein (HVP)	No
Butylated hydroxyanisole (BHA)	No
Butylated hydroxytoluene (BHT)	No
Tertiary butylhydroquinone (TBHQ)	No
Colorings ⁵	No

¹ Allergens identified by the FDA as causing serious allergic reactions in some individuals.

² Priority Food Allergens identified by Health Canada

³ Allergenic foods identified in Annex IIIa of the EU Labeling Directive

⁴ Gluten-containing grains include barley, oats, rye, triticale, wheat, kamut, spelt, or their hybridized strains.

⁵ FD&C certified (including Yellow 5 & 6), titanium dioxide, carmine, artificial colorings.

2.3 FREE FROM GLUTEN

We are pleased to affirm that our products do not contain gluten containing grains^{2,3,4} and gluten^{2,3,4} is less than 20 ppm in the final product.

2.4 IRRADIATION / SEWAGE SLUDGE

Our sourcing and manufacturing processes do not undergo irradiation treatment nor do our potato starch products contain sewage sludge.

2.5 ETHYLENE OXIDE

Ethylene Oxide (ETO) is not utilized in the production, storage, or transport of potato starch products.

2.6 ANIMAL DERIVATIVES

Based on information from our suppliers, our knowledge about the raw materials and the manufacturing process; we can affirm that no animal derivatives or by-products are used in the production of our potato starch products.

2.7 BSE / TSE STATEMENT

Our potato starch products are derived from botanical sources and are not manufactured using materials of bovine, sheep, goat, or human origin. These products do not come into contact with any animal origin material in which transmissible spongiform encephalopathies (TSE) or bovine spongiform encephalopathy (BSE) have been found.

2.8 NANOTECHNOLOGY

We can affirm that our potato starch products are not produced via nanotechnology.

2.9 PROPOSITION 65

California Proposition 65: Safe Drinking Water and Toxic Enforcement Act of 1986 provides a chemical list of substances known to the State of California to cause cancer or reproductive toxicity.

We have reviewed, our potato starch products and to our knowledge these products do not contain chemicals known to the State of California to cause cancer or toxicity at levels above the “no significant risk levels”.

2.10 PESTICIDE, MYCOTOXINS AND HEAVY METALS

Ingredion Incorporated's contaminant monitoring program consists of regular audits of our incoming raw materials and finished products.

To monitor compliance to requirements, we perform testing of the incoming raw materials annually for pesticides and mycotoxins. We also perform pesticide, mycotoxin, heavy metals, and residuals testing on random finished products from each of our manufacturing locations on an annual basis. Testing is compliant to the regulations where the material is manufactured.

2.11 WADA, NFL / NFLPA AND NSF PROHIBITED INGREDIENTS

We are pleased to affirm our potato starch products do not contain any substances that appear on the WADA, NFL/NFLPA or NSF prohibited lists. We do not handle any substances banned by these agencies and the risk that our products could come into contact with these prohibited substances is minimal.

2.12 BISPHENOL A

We are pleased to affirm that our potato starch products are not manufactured or packaged with Bisphenol A and based on product chemistry Bisphenol A would not reasonably be expected to be present.

2.13 REACH STATUS

REACH is the acronym for the Registration, Evaluation, Authorization and Restriction of Chemicals. This legislation sets chemical policy in Europe (EC No. 1907/2006).

The majority of products supplied by Ingredion are classified as food additives, food ingredients or feed materials and are therefore exempt from the scope and the main provisions of EU and UK REACH. Further products are listed on Annex IV and are exempt from registration regardless of their end use.

2.14 ANIMAL TESTING

Please follow the link below to review Ingredion's Animal Testing Policy.

<https://www.ingredion.com/content/dam/ingredion/pdf-downloads/corporate/sustainability-documents/Animal-Testing-Policy-05-11-21.pdf>

2.15 CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT 2010

Ingredion Incorporated is committed to conducting business in compliance with all applicable laws and regulations, including the California Transparency in Supply Chain Act. Consistent with our Policies on Business Conduct and Core Values, we neither accept nor support the use of illegal or enforced labor.

2.16 CONFLICT MINERALS

Our products do not originate in the Democratic Republic of the Congo (DRC) where minerals are mined in conditions of armed conflict and human rights abuses. Conflict minerals including tantalum, tin, gold, or tungsten are not used during the production of these products.

2.17 FDA FACILITY REGISTRATION

Ingredion Incorporated has registered all of our manufacturing facilities worldwide as required by the Public Health & Bioterrorism Preparedness & Response Act of 2002 and FSMA 2011 (Food Safety Modernization Act).

We consider the FDA registration number of each facility to be confidential information which will be shared only when required by law or on a case-by-case basis under a non-disclosure agreement.

2.18 FSMA (FOOD SAFETY MODERNIZATION ACT) COMPLIANCE

Ingredion Incorporated considers product safety to be of utmost importance and maintains robust quality, food safety, and food defense systems at all of our manufacturing facilities. Our facilities are GFSI certified.

Certified Preventive Control Qualified Individuals (PCQIs) are in place at all Ingredion manufacturing sites producing goods for sale to US and Canada customers. PCQIs have overseen the transition of our risk-based food safety management systems to align with the requirements of the Food Safety Modernization Act (FSMA) Preventive Control Rules. All have established GMP procedures and use a risk-based approach in our hazard analysis.

Food Defense Qualified Individuals (FDQIs) are in place at all Ingredion manufacturing sites producing goods for sale to US and Canada customers. FDQIs have developed robust food defense programs that comply with the requirements of the Food Safety Modernization Act (FSMA) Intentional Adulteration (IA) Rule.

2.19 BIOENGINEERED (BE)

We are pleased to affirm that our potato food starches are exempt from the USDA National Bioengineered Food Disclosure Standard (NBFDS).

2.20 NO GE AUDITS

Ingredion Facilities producing potato food starches certified to the SGS No GE Ingredients Supply Chain Process Verification Standard U.S. version are Fort Fairfield, Idaho Falls, Moses Lake, Plover and Richland. The audits are conducted annually and verifies the process of preparing non-genetically engineered (non-GE) ingredients for sale in the United States.

3 FOOD SAFETY AND QUALITY PROGRAMS

3.1 FOOD SAFETY PROGRAMS

Ingredion Incorporated is committed to the manufacture and sale of food, healthcare, nutritional, and pharmaceutical ingredients that are fit for use and safe to consume. All facilities owned or contracted by Ingredion Incorporated that manufacture, process, handle, or distribute food, healthcare, nutritional, or pharmaceutical ingredients for Ingredion have documented Food Safety and GMP procedures in place that provide for the safety of our products. Each facility's food safety management systems are comprehensive, and science based.

The food safety management systems drive continuous improvement and encompass a food safety risk assessment and preventive measures, good manufacturing practices, and employee training.

3.2 FOREIGN SUPPLIER VERIFICATION PROGRAM (FSVP)

Ingredion Inc. continues to enhance and support its Supplier Verification Program which includes foreign supplier verifications. For incoming raw materials or ingredients, our program identifies all known or reasonably foreseeable hazards with each food received/ imported. An evaluation of the risk is based on our hazard analysis and the supplier's performance. Reevaluation occurs at least every three years or when new information comes to light about a potential hazard or a change in supplier's performance. We conduct onsite audits of our foreign affiliates. Non-affiliate suppliers are audited when there is a reasonable probability that exposure to a hazard will result in an adverse health consequence.

Ingredion values its commitment to Food Safety and considers itself to be a strategic contributor to everyday products used in the food and beverage industries.

3.3 RECALL POLICY / TRACEABILITY EXERCISES

Ingredion Incorporated's "Product Recall Program" sets requirements for each Ingredion manufacturing facility regarding the procedures and training needed to effectively handle a potential recall situation. The index of the Standard includes the following topics:

- Introduction (Purpose, scope, responsibilities, definitions, references)
- Detection of a possible recall situation
- Notification of Corporate Quality Assurance
- Initial Investigation and Problem Assessment
- Recall Strategy
- Recall Notifications (authorities, customers, 3rd party auditors)
- Recall Completion and Follow-Up Activities
- Product Recall Simulation (Traceability Exercises)

Quality Assurance initiates traceability exercises at each Ingredion facility at least annually. The results of the traceability exercises are reviewed by Quality for effectiveness and analyzed for improvement opportunities.

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3.4 SUPPLIER APPROVAL PROGRAM / SUPPLIER CODE OF CONDUCT

Ingredion's Supplier Management Program is managed by multiple departments within Ingredion who are responsible for ensuring approved suppliers do not contribute to any risk and conform to all specified requirements.

Ingredion only uses approved suppliers who have been evaluated to conform to Ingredion's specifications. Ingredion determines and applies criteria for the evaluation, selection, monitoring of performance, and the re-evaluation based on their ability to continuously provide such specified requirements. A risk-based analysis is performed on all suppliers to determine the depth of the evaluation and thus suppliers are categorized into tiers based on their ability to meet requirements, the effect on product realization, and the impact of food safety and/or product quality.

The Supplier Management Program also applies to outside contracted facilities, transportation and all other facilities which are not operated by Ingredion but are contracted to provide a service, they are approved for use by meeting all the necessary documented requirements.

Supplier food safety preventative controls are evaluated by a PCQI trained individual. This determination is based on the assessment of the food safety risk from the material and from the supplier. The PCQI trained assessor verifies that there are adequate and sufficient programs, practices, and procedures in place for food safety and food security.

The Ingredion Global Supplier Code of Conduct ("GSCC") clarifies the principles and expectations for Suppliers doing business with us. The GSCC is a supporting code to the Ingredion Code of Conduct. Ingredion expects all of its employees to comply with the law and act ethically in all matters. We have the same expectations of our Suppliers. We expect our Suppliers to commit to the principles expressed in the GSCC, which are an important part of our Supplier selection and evaluation process.

<https://www.ingredion.com/na/en-us/company/meet-ingredion/corporate-responsibility.html>

3.5 CHANGE MANAGEMENT

Ingredion Incorporated's quality management system is based on ISO 9001:2015 requirements. A Management of Change (MOC) process is in place. The MOC process includes a review and approval of the change by Quality Assurance. Customers are notified when there is a change to stated specification, or when there is a major change that could impact food safety, product quality or fitness for use.

4 OTHER

4.1 BUSINESS CONTINUITY

Ingredion Incorporated recognizes that an uninterrupted supply of purchased materials is a vital business issue for our customers. Ingredion Incorporated has an extensive network of manufacturing facilities that provide flexibility and redundancy in our ability to supply our customers. This network supports our goal which is to minimize the impact that an event might have on the supply of products to our customers. Our Business Continuity Management Program is comprised of three critical elements: Emergency Response Program, Crisis Management Program and Business Continuity Plans.

Ingredion Incorporated has conducted a general risk assessment of its operations, including the impact of natural disasters which may impact our ability to meet customer expectations. The details of this assessment are confidential and cannot be shared outside the company. The Company has robust programs to address developing and emerging issues including a crisis management program and emergency response procedures that are reviewed and exercised on a regular basis. On a regular basis each site conducts emergency response drills, reviews their crisis communication plans, and assesses potential business risks and, when appropriate, establishes plans designed to mitigate these risks.

While Ingredion Incorporated cannot guarantee that forces outside our control will never affect our ability to fulfill a supply agreement, we believe that we are well positioned to minimize the effect on major disruptions.

4.2 STATEMENT OF CODE OF CONDUCT

Please follow the link below to review Ingredion's Policies on Business Conduct (the "Policies"). The Policies are a statement of how Ingredion operates its business and lives its values. The Policies provide general guidance on legal or ethical choices our employees may face in the course of doing business and in interacting with one another.

<https://www.ingredion.com/na/en-us/company/meet-ingredion/corporate-responsibility.html>

Our employees are all stewards of our company's culture and reputation. We are responsible for protecting the interests of the company by acting in accordance with laws, regulations, and our company values of safety, quality, integrity, respect, excellence, and innovation.

At Ingredion, nothing is more important to us than the trust of our customers. As a result, we operate and will continue to operate under these Policies in the future in all our business and community relationships.

4.3 SUSTAINABILITY

Please follow the link below to review Ingredion's latest sustainability report.

<https://www.ingredion.com/na/en-us/company/meet-ingredion/sustainability.html>

4.4 DOCUMENT CONTROL PROGRAM

Ingredion maintains the documented Information necessary to operate an effective quality and food safety management system. The Ingredion Document Control Process contains controls to ensure that Documented Information is:

- Identified and formatted
- Reviewed and approved
- Available for use
- Protected
- Version and access controlled

Documents are identified by title and where applicable by product name and product code. Documents are prepared on approved Ingredion templates. In the case of records such as certificates or audit reports these records are prepared by the issuer on their template.

Documents are reviewed by identified Ingredion subject matter experts prior to being issued for use. The approver's name and approval date are recorded in the document metadata.

Review frequency is defined when a document is posted in the document database. Documents are reviewed and posted as changes occur or at the expiration date. Standard documents are reviewed every 3 years or as changes occur. The exception is the Safety Data Sheet (SDS) which does not expire and is updated only when changes occur. In the case of records such as certificates the review date is set according to the expiration date on the certificate.

Version control is maintained in the document database and document metadata. Electronic documents contain an effective date.

Documents are posted to the document database for internal use. Documents which are approved for public view are available on our Technical Document website. Please press control + click on the link below to access our website.

