PLANT INFORMATION

OKMULGEE

A HUBER COMPANY

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CPKelco
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Document No.: PLD-03

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1. Facility Overview

A. Supplier Information

	Corporate	Manufacturing Site
Company Name	CP Kelco U.S., Inc.	CP Kelco Okmulgee Plant
Address:	3100 Cumberland Boulevard, Suite 660 Atlanta, GA 30339 USA	1200 W. 20th Street Okmulgee, OK 74447
Telephone:	1-800-535-2687	(918) 758-2600
Fax:	1-312-554-7810	(918) 756-2926
Parent Company:	J.M. Huber Inc	
E-mail:	customer.request@cpkelco.com	
Website:	www.cpkelco.com or www.huber.com	

B. Manufacturing Site Contacts/Emergency Contacts

Name:	Deanna Roberts	Zachary Cole	Jesse Cox
Function:	Plant Manager	Operations Manager	Quality Manager
Phone:	(918) 758-2568	(918) 758-2533	(918) 758-2552
Mobile:	(918) 729-4160	(918) 752-8130	(918) 752-8517
E-mail:	Deanna.Roberts@cpkelco.com	Zachary.Cole2@cpkelco.com	Jesse.Cox@cpkelco.com

C. Facility Description

CP Kelco located in Okmulgee, Oklahoma is nestled on 95 acres with 30 acres utilized for production and 10 acres utilized as a private waste water treatment facility. The plant commissioned in January of 1977 is located approximately 40 miles south of Tulsa.

The principle products of the Okmulgee plant are xanthan and gellan gums. The process for "growing" xanthan and gellan gum requires special technology in fermenting highly viscous broths. Products produced in Okmulgee are shipped around the world and serve the food, pharmaceutical, industrial and oilfield markets.

The site has a population of approximately 180 employees, as follows:

Production*	118
Quality	21
Administration	41

*Production employees include unionized by IUOE (Operating Engineers)

D. Plant History

Construction of the Okmulgee site began in 1975, with manufacturing operations starting in 1977.

1975	Ground broken at Okmulgee
1977	Xanthan manufacture started
1995	Acquired by Monsanto
1996	Kelco NutraSweet and Monsanto's Food Phosphate businesses merged
1998	XANTURAL® (excipient pharmaceutical) manufacture started
1999	Sold Alginates business
2000	Acquired by Lehman Brothers and Hercules Chemical
2002	JM Huber acquired Hercules Chemical share of CP Kelco
2004	Wholly Acquired by JM Huber
2016	Gellan manufacture started

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E. Products manufactured at Plant Site

Major products processed at the facility include xanthan gum (a polysaccharide used in various markets as a versatile thickener and stabilizer) and other highly specialized biopolymers used to control the rheology of solutions under varying conditions of pH, temperature, and salt concentrations. In fact, Okmulgee-produced biogums can be found in thousands of household products including salad dressings, toothpaste, desserts, lotions, cleaners, and cosmetics. In addition, the manufacturing site produces food grade products that are Kosher and Halal certified, as well as excipient pharmaceutical grade products.

Xanthan gum is a high molecular weight polysaccharide produced by a pure culture fermentation of a carbohydrate with *Xanthomonas campestris*, which is then purified by recovery with isopropanol alcohol, dried and milled.

Gellan gum is a high molecular weight polysaccharide produced by a pure culture fermentation of a carbohydrate with *Sphingomonas elodea*, which is then purified by recovery with isopropanol alcohol, dried and milled.

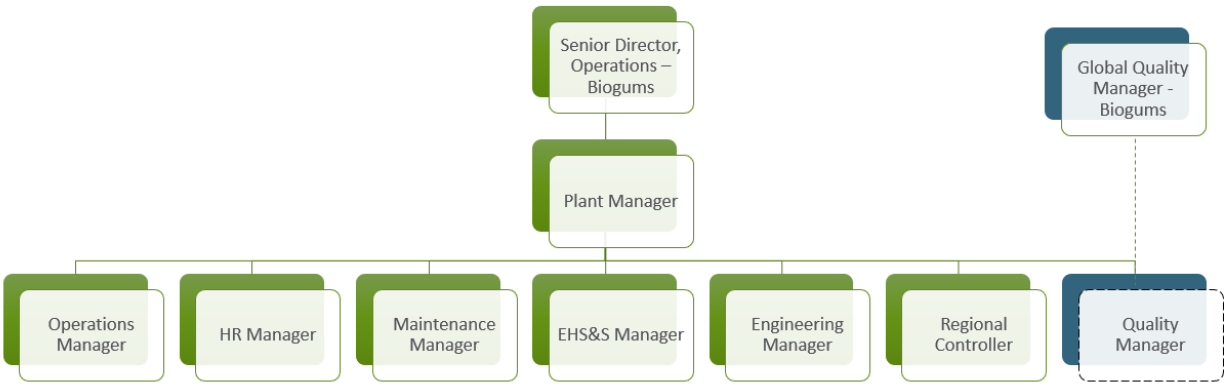
F. Manufacturing Description

Brief description of xanthan gum and gellan gum manufacturing process:

Fermentation → Precipitation → Drying → Milling → Packaging → Shipping

With regards to water, steam and air handling, there is a monitoring program in place. Potable water is used and supplied by the city; Micro testing of city water samples is conducted frequently. Steam is indirectly used throughout the plant to aid in processing. Compressed air used in production is filtered.

G. Organizational Chart



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2. Evidence of Compliance

A. Certifications

- FSSC22000
- ISO 9001:2015 – Registration Number FM 28955; Registrar: British Standards Institute (BSI)
- OK Kosher
- IFANCA HALAL

B. Food Safety

- FSSC22000 version 4.1 food safety system
- cGMPs Title 21 of the Code of Federal Regulation Part 117-Current Good Manufacturing Practice, Hazard Analysis, and Risk-based Preventive Controls for Human Food.
- Codex Alimentarius
- International Pharmaceutical Excipient Council of Americas (IPEC) guidelines
- Hazard Analysis Critical Control Points (HACCP) guidelines

C. Regulatory Inspections

- FDA and Oklahoma State Health Department; general audits, no findings noted.

3. Compliance Details

Sections A-G refer to the quality management system requirements listed in ANSI/ISO/ASQ/ Q9001:2015. For your convenience, the requirement number has been placed to the right of each header in parenthesis.

A. Quality Management Systems (ISO9001:2015 Clause 7.5 Documented Information)

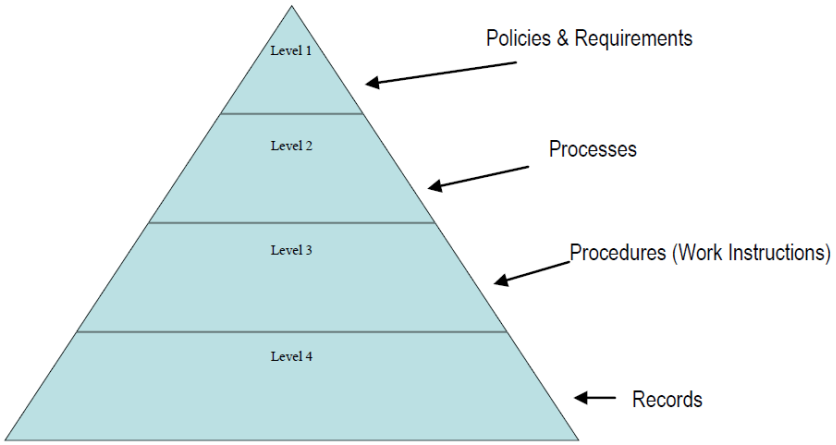
General Requirements

The quality system for CP Kelco's business is designed to conform to the following industry standards:

- ISO 9001:2015
- Current Good Manufacturing Practice, Hazard Analysis, and Risk-based Preventive Controls for Human Food.

Document Requirements

The following information summarizes CP Kelco's document system. The CP Kelco manufacturing procedures are compliant with this model:



Controlled, electronic procedures are used wherever possible within the production facility and are easily accessible to all employees. Paper copies are uncontrolled unless noted otherwise. Changes to documents are maintained in a revision history and approvals of each document revision clearly defined. Implementation of changes is conducted using CP Kelco's change control policy.

Employees who need to know about a change in the quality system documentation (procedures, work instructions, recipes, etc.) are informed by their team leader/manager.

Records are kept as prescribed in the company's Record Control Procedure.

B. Leadership (5)

Leadership and Management Commitment (5.1)
Top plant management is committed to development, implementation and continual development of the quality management system. Top plant management uses risk-based thinking in the planning aspects of the business and establishes metrics for the performances of processes. KPI's are loaded into metrics dashboards and reviewed during management meetings.

Customer Focus (5.2)
Top plant management has demonstrated leadership and commitment with respect to customer focus by ensuring that:

- Customer and applicable statutory and regulatory requirements are determined, understood, and consistently met.
- The risks and opportunities that can affect conformity of products/services and the ability to enhance customer satisfaction are determined and addressed.
- The focus on enhancing customer satisfaction is maintained

Quality/Food Safety Policy (5.3)

Our Quality Policy is as follows:

The Okmulgee site is committed to providing product that meets statutory and regulatory requirements and our customer's expectations. This is achieved through:

- The adherence to and continuous improvement of a documented quality management system and food safety programs
- Informed and well-trained employees
- Consistent products that meet specifications
- Communicating relevant food safety information to personnel internally and to appropriate external organizations in the food chain
- Reviewing this policy at regular intervals for continued suitability

C. Planning (6)

CP Kelco (Okmulgee) has determined external and internal issues, that are relevant to our purpose and strategic direction and that affect our ability to achieve the intended outcome(s) of the quality management system. Needs and expectations of interested parties were considered including customers, suppliers, shareholders, employees, surrounding residents, governments, certification institutes, and contractors etc. Meanwhile, relevant risks and opportunities were determined, and actions to address these risks and opportunities were developed as well.

CP Kelco (Okmulgee) maintains a quality manual that includes clearly stated goals. Quality objectives are clearly designated in the quality manual and all are measurable and consistent with the Quality Policy. Progress toward all targets, objectives, and goals are reviewed during staff meetings, management review meetings and during other business meetings throughout the year.

CP Kelco (Okmulgee) maintains a Management of Change program, any modification to packaging, labeling, raw material significant changes, process chemistry effecting purity, equipment, etc.. The program is a standard methodology for initiating, reviewing, and implementing all changes to ensure that the integrity of the management systems involved (e.g. environmental, health, safety, quality,

food safety, financial, etc.) are maintained.

D. Support (7)

Provision of Resources (7.1.1)
The production facility utilizes work process, roles and responsibilities that are clearly defined. The work force includes sufficient salaried, hourly, and contract personnel to ensure the requirements of the work process and quality system are met.

Human Resources (7.1.2)
The production facility has an established training program that is facilitated by the HR department to ensure that all personnel have the appropriate education, training and experience to complete their assigned tasks. Each site conducts a new employee orientation (NEO) which includes cGMP, HACCP, ISO, FSMA, Safety, Environmental, Personal Protective Equipment (PPE), and other topics. cGMP refresher training is conducted at least once per year. Training includes visitors and contractors with an emphasis on cGMP and Safety. Frequency of other job-related training is determined by each department.
A cGMP policy including personal hygiene and personal attire requirements has been established to ensure all personnel maintain an adequate level of personal hygiene for the job being performed.

Infrastructure (Facilities and Equipment) (7.1.3)
The production facility has an adequate number of buildings, equipment, and raw materials to manufacture, process, package, test, and store products in accordance with quality system requirements. The buildings are in a good state of repair and all critical equipment is included in the calibration/preventative maintenance program.

Process Environment (7.1.4)
There are active housekeeping and pest control programs in place at the production facility to maintain the facility in an appropriately clean and sanitary condition. Both programs include written procedures that assign responsibilities and describe the methods, equipment and materials to be used. The pest control program includes use of exterior bait stations, interior rodent traps, and UV lights with glue boards. The pest control program is administered by a 3rd party service provider. No pesticides are stored at the production facility.

The work environment needed to achieve conformity to product requirements necessary for the operations of processes has been determined, provided and maintained. Safety hazards are identified and prioritized based on risks. Job-safety procedures have been implemented and are monitored for compliance.

- Records of monitoring corrective action on accidents and near misses are reviewed at regular meetings to discuss safety issues.
- Procedures for housekeeping, defined responsibilities, training of personnel, periodic audits of housekeeping, corrective actions on nonconformities and signage to remind personnel of guidelines have been implemented.
- Personal hygiene and behavior requirements are included in the Okmulgee plant cGMP policy to be followed by all employees and visitors to the manufacturing site.

Monitoring and Measuring Devices (7.1.5)
All quality critical equipment and instrumentation are on a documented schedule for calibration and maintenance. The schedule is established by considering such things as manufacturer's recommendation, history, nature of the process, or other pertinent factors. Non-routine maintenance activities are also conducted when specific problems such as leaks, known or suspected equipment failure, or visual inspections show a need. Calibration standards are traceable to NIST standards where applicable. Qualified in-house instrument technicians and 3rd party approved calibration vendors administer these services.

When the measuring equipment is found to be unfit for its intended purpose, the validity of the previous measurement results is assessed to determine whether they have been adversely affected. Appropriate action is taken on the equipment and any product affected.

Knowledge (7.1.6)

CP Kelco) determined the knowledge necessary for the operation of the quality management system and its processes and to assure conformity of products and services and customer satisfaction. This knowledge is maintained, protected and made available as necessary including current programs, procedures, SOP, AAR, meeting minutes, training materials, laws, regulations etc.

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Competence (7.2)
Responsibilities and authorities are clearly defined by management through use of defined work processes and the roles and responsibilities required to ensure effectiveness. Each employee within the production facility has a written job description with defined responsibilities and they are trained to ensure they have the required skills, knowledge and experience to ensure success within the job. Documentation of training, job task certifications, new employee orientation, on-the-job training, external certifications, etc. are maintained by the Human Resources department.

Awareness (7.3)
Employees are made aware of the quality policy, quality objectives and their contribution to the effectiveness of the quality management system, including the benefits of improved quality performance and the implications of not conforming with the quality management system requirements through new employee orientation, internal audit results, annual refresher training, department/individual KPIs, and external training.

Communication/Authority (7.4)
CP Kelco determined the need for internal and external communications relevant to the quality/food safety management system. Communication procedure is maintained, aiming to establish internal & external communication channels on quality and food safety, to accurately transfer and feedback information in a timely manner and guarantee normal operation of the management system.

The production facility has a quality department that is led by the Quality Manager. The quality department has the responsibility and authority to approve or reject all raw materials, packaging components, intermediates and finished products. In addition, the quality department participates in review and approval of any change within the facility's Management of Change (MOC) process.

E. Operation (8)

CP Kelco operational processes are planned, implemented and controlled. Product requirements and criteria for processes and the acceptance of products have been established. Determining, maintaining and retaining documented information provides confidence that the processes have been carried out as planned and that product conformity to specifications can be demonstrated. Outsourced 3rd party processes such as laboratories, tollers and warehouses are controlled.

Each product manufactured by CP Kelco has a written, controlled product specification that is adhered to. CP Kelco Technical Services can work with customers to develop unique products for specific applications. Any changes to the product or the manufacturing process that may be considered are evaluated by using the Management of Change (MOC) procedure. During the evaluation, customer requirements, statutory and regulatory requirements, and applicable destination markets are all considered.

CP Kelco has effective processes in place for customer communication. Examples of how product information is communicated to customers is through CP Kelco website, service agreements, product data sheets, marketing literature and brochures, price lists, and product samples. CP Kelco maintains documentation of all customer feedback and complaints. Each reported issue is investigated, and a report of the investigation and corrective actions taken is made available to the customer.

Product requirements are documented and maintained within individual product specifications. These requirements are determined with the following considerations:

- Any applicable statutory and regulatory requirements, including as appropriate:
  - CFR 21(as appropriate)
  - Federal Food, Drug and Cosmetic Act (as appropriate)
  - U.S. Pharmacopoeial/National Formulary (as appropriate)
  - E.C. Directives (as appropriate)
  - Other Agencies (as appropriate)
  - Any additional requirements considered necessary by the organization

When product requirements are changed, it is ensured that relevant documents are amended, and that relevant customers and employees are made aware of the change requirements.

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Quality Control laboratories are included in the Okmulgee plant ISO 9001 certification. Quality Control evaluates all incoming materials, in-process, and final products per CP Kelco specifications. Materials are held in quality inspection status in SAP until a usage decision is made by Quality.

The production facility has documented specifications in place to ensure supply of raw materials, packaging materials and services meet agreed upon requirements. Raw material specifications are documented. Raw materials and packaging materials are evaluated and tested prior to approval for use by the quality department. Supplier qualification and assessment procedures are in place.

The Okmulgee site currently does not have a design and development function. The site currently manufactures to corporate design. However, if a design and development function become a part of the site, the appropriate policy, procedures and records will be developed and implemented into the Quality Management System.

Externally provided processes conform to CP Kelco requirements. Providers are approved through the Management of Change process and remain within the control of the Okmulgee plant quality management system.

CP Kelco has outfitted the manufacturing facility with equipment suitable to its purpose, constructed and installed in such a way as to minimize the possibility of contamination of the product from the equipment, operators or the environment. The equipment is maintained according to written procedures. The manufacturing process and facility have been designed to minimize the possibility of cross contamination. Consistent operation of each manufacturing process has been demonstrated through process capability studies, providing assurance that the manufacturing process can consistently produce material that meets established specifications.

Preventive maintenance is performed on equipment identified as critical to product quality in ISO 9001 quality system. Building maintenance is conducted as required for structural integrity and weather resistance.

Equipment cleaning procedures are in place for all product contact equipment. Cleaning records are maintained.

There is traceability forward from the raw materials through to the final batch and backward from final batches through to the raw materials. Final batches are assigned a unique batch number. Production records are in place for each product and detailed batch records are created for each final batch. In-process and final product sampling and testing plans are in place to ensure appropriate monitoring of defined critical process and product parameters occurs within each unit operation of the production process. The quality department is responsible for reviewing batch data and release of the finished product upon meeting approved specifications. Any out-of-specification result is documented and investigated according to a written procedure. Documented procedures are in place to prevent mix-ups during packaging and labeling. Retain samples are collected from each batch and maintained at least one year past the shelf life/best before date. Shelf life/best before dates for products are indicated in the product specification and are based on appropriate stability testing.

In addition, procedures for product recalls are in place. Mock recalls are conducted internally and are done at least annually. The time needed to identify and locate suspect material is less than 4 hours. Records of traceability exercises are maintained.

All packaging materials are purchased according to documented specifications and are inspected prior to use. All foodgrade, cosmetic and excipient grade products are filled to NIST weight control standards and are either heat sealed or equipped with tamper evident tape. Finished products are stored and shipped in appropriate conditions that meet the storage conditions outlined in the Product Data Sheets.

There is a documented inspection procedure for transportation vehicles.

The performance of key process and product metrics throughout the production facility are monitored and tracked daily to determine if improvements are warranted.

To ensure customer satisfaction, customer complaints, returns and feedback are routinely reviewed to provide areas for improvement. The production facility conducts internal audits at planned intervals to ensure the quality management system conforms to the requirements of ISO 9001:2015 standard. In addition, FSSC22000 and current Good Manufacturing Practices (cGMPs) are effectively implemented and maintained. The responsibilities and requirements for planning and conducting audits, and for reporting results and

maintaining records are defined in a documented procedure.

In addition to cGMP/FSSC22000/ISO audits, the facility is audited by other agencies such as FDA, Kosher, Halal, and Oklahoma State Department of Health. Audit results are communicated to during scheduled weekly plant meeting and during the annual Quality Management Review meeting. Corrective actions are entered into the Okmulgee plant QMS action tracking system to ensure documentation of root cause, follow-up and verification of effectiveness.

The facility has a comprehensive product testing plan. Test methods are either industry standard or developed within CP Kelco and are validated to ensure adequate precision and accuracy for the intended use. Product is not released to the customer until each lot is tested to specifications and released by Quality. Evidence of conformity with the acceptance criteria is maintained in the batch record with traceability to the person authorizing the release. Certificates of analysis are supplied with each batch of released product.

Raw Materials and packaging found not to meet specification are clearly identified and segregated to prevent inadvertent use. Finished product that fail to meet specification is electronically segregated in SAP. If nonconforming product is detected by customer after delivery, the issue is documented in the Quality Issues Management system, investigated, and corrective actions assigned that may include return or disposal of the material. Records of nonconforming products are maintained and all incidences of nonconformance are investigated to identify the root cause. Investigations are documented and corrective actions are taken to prevent recurrence of the problem. SOP's identify the authority deciding the action in respect to the nonconformity.

F. Performance evaluation (9)

Customer Satisfaction (9.1.2)
The organization monitors customers' perceptions of the degree to which their needs and expectations have been fulfilled. Examples of how the company monitors customer perception include sales surveys and evaluations, quality summits with customers and KPI's.

Analysis and Evaluation of Data (9.1.3)
CP Kelco (Okmulgee) uses data derived from customer complaints, product reviews, internal audits and audits by customers for evaluating the effectiveness of its quality systems to identify opportunities for improvement.

Internal Audit (9.2)
To judge conformance and effectiveness of the quality management system and to identify continuous improvement opportunities, a cross-functional team of impartial internal auditors are trained to carry out internal audits at planned intervals. Audits are scheduled and prioritized based on:

- Importance of the processes
- Identification of risk
- Changes to the organization
- Results of previous audits

Audit findings are shared during management review meetings. Corrective actions are taken within required timeline and followed up by QA until completion.

Management Review (9.3)
A Management Review Team (MRT) meeting is conducted at least once a year with the top management. MRT review inputs include:

- Status of actions from previous management reviews
- Changes in external and internal issues that are relevant to the quality management system
- Information on the performance of the QMS
- Trends in customer satisfaction and interested parties
- Extent to which quality objectives have been met
- Process and product conformity, including measurement result trends
- Status of non-conformities and corrective actions, MOC
- Audit results (internal and external)
- External provider evaluation results

- Adequacy of resources
- Effectiveness of actions taken to address risks and opportunities

Outputs of management review meetings include:

- Opportunities for improvement
- Needs for changes in the QMS
- Resource needs

G. Improvement (10)

A documented corrective and preventive action procedure is in place at the Okmulgee production facility which ensures that issues such as product nonconformities, the manufacturing process and associated work processes, customer complaints and problems with the quality system itself are investigated in a timely manner to determine root cause and appropriate follow-up actions. The organization continually improves the suitability, adequacy, and effectiveness of the quality management system. The organization considers the following to determine if there are needs or opportunities that need to be addressed as party of continual improvement.

- Results of analysis and evaluation
- Outputs from management review

H. cGMP Policy

The plant site cGMP policy covers the following:

- Personal Hygiene
- Clothing
- Hair covering
- Jewelry/Pocket Items
- Eating/Drinking/Gum & Tobacco
- Sneezing/Coughing/Spitting
- Good Documentation Practices
- Glass/Brittle Plastic
- Knife
- Sanitation Program
- Allergen Control
- Pallet Policy
- Lubricants/Chemical Control

The cGMP Policy is part of the overall food safety program. This policy is based on a combination of regulatory requirements, customer needs and industry standards and consists of successive levels of increasing requirements. This policy applies to employees and non-employees. All plant areas, including warehouses, are physically inspected for compliance.

I. HACCP & HARPC Principles

A formal and documented HACCP & HARPC program is in place for each product manufactured in the facility (excluding industrial grade products). All the responsibilities for coordination and execution of the HACCP&HARPC program are clearly defined. A PCQI (Preventive Controls Qualified Individual) has been established.

The production process was evaluated for chemical, physical, microbiological hazards including allergenic, security and radiological hazards

The kinds of product protection devices that are used are screens, magnets and metal detectors.
Mesh screen size is determined by product type and is cleaned and inspected after every batch. A three-tier magnet is in the transfer line and is also cleaned after each batch. Metal detectors are used in line to protect equipment. There is also a metal detector at the final box packaging with the following detection sensitivities.

>=5.5mm Stainless Steel
>=5.5mm Non-Ferrous
>=5.5mm Ferrous

The control procedures for critical control points (CCP's) have been validated and the effectiveness of corrective actions related to the control of CCP's have been verified.

Allergenic Materials
There are no ingredients with allergenic properties used in the blending or packaging areas. The only allergen materials used are added at an early stage in the process and are not present in the final product. These materials are stored in dedicated storage areas and are not handled in areas where finished products would become exposed to contamination. We follow our HACCP&HARPC procedures and cGMPs to ensure that there is no cross contamination.

Allergen Control Policy
Allergen Control Policy has been put into place to eliminate or minimize the risk of cross-contamination of our products with allergenic material. To do this, we have implemented a company-wide commitment to controlling allergens. In manufacturing we adhere to current Good Manufacturing Practices (cGMP's) and established allergen procedures. With proper training and document management, we can reduce the potential for any allergenic contaminations of our products. This allergen control program is linked to our Quality Management System, as mentioned in section 3A-F, which is supported by our cGMP Policy.

4. Security/Food Defense

A. Supply Chain Security

U.S. Bioterrorism Act Registration:
In compliance with the U.S. Bioterrorism Act, CP Kelco has registered this facility.

U.S. Customs Trade Partnership Against Terrorism (C-TPAT)
CP Kelco is a participant in the U.S. Customs-Trade Partnership Against Terrorism program, a voluntary government-industry partnership designed to enhance supply chain and border security, and enable participants to avoid border inspection delays, especially during periods of heightened national security alerts.

Contingency Plan to Identify and Mitigate Business Interruption:
CP Kelco has established contingencies to supply product in the face of unplanned events. These plans include the following activities.

- The plant has documented worse case scenarios that are reviewed on a regular basis with necessary steps defined to minimize an emergency and its effect on surround assets and employees.
- CP Kelco utilizes several warehouses both on and off site to reduce the effect of a single catastrophic event on any one location.
- Product inventory levels are monitored and maintained to allow coverage for most supply chain interruptions.

B. Plant Security

CP Kelco (Okmulgee) Security/Food Defense Policy is designed to provide a secure environment to protect our employees, customers, property and brand. Documented training is provided to all employees on security responsibilities.

- Food Defense Team established
- Annual vulnerability assessment
- Food Defense Policy
- Annual security training and security audit
- Procedures have been established that provide for authorization of people and vehicles accessing CP Kelco facilities. Identification badges / documents (IDs/passes) are furnished to all people for entry access. (Includes visitors and contractors)
- Displaying badges is required for entry. The campus is protected from unauthorized access by a perimeter fence, 24 hours

security guard and monitoring camera.
- Electronic access control to production, lock toxic chemicals, lock key process and operation room.
- Procedures are also in place to ensure that computer systems and the information they process are operated and maintained in a secure environment.
- Procedures are in place for the prevention, detection and investigation of crime and fraud.
- Background checks are made and done upon hiring of all personnel including on-site contractors. Terminated employees are removed immediately from access lists and their ID badges are secured.

C. Safety and Environmental Information

Health and Safety Program:
CP Kelco (Okmulgee) has a documented health and safety program designed to protect the environment, our personnel, and our facilities. The program includes monitoring progress against goals, internal audits, self assessments and employee training. The program is compliant with OSHA 29CFR - 1910.

Registrations to ISO 14000:
This facility is not certified for Environmental Management under ISO 14001. However, it has an environmental, health and safety program that exceeds these requirements and apply current standards of best practice – Minimum Mandatory Standards and Requirements (MMSRs).

The CP Kelco Environmental, Safety, Health and Regulatory Affairs organization has developed security protocols using the FDA guidance information published in 67 FR 1224 (Jan. 2002) and American Chemistry Council Security Guidelines published in June 2002.

CP Kelco has developed a multi-disciplinary team that has addressed the various aspects of employee, community and food safety. The team has members from Safety, Quality Assurance, Distribution, Supply Chain, and Information Technology. Our initiative has included:

- Development of revised written Security Guidelines focused on:
  - –Management
  - –Physical security
  - –Employees
  - –Information technology
  - –Raw materials
  - –Packaging
  - –Operations
  - –Finished goods
- Site perimeter and access control assessment and action plans (all locations)
- Food safety and security audit and action plan
- Surveys of vendor and supplier security programs
- Survey of our Information Technology systems and procedures

D. Emergency Response Plan

CP Kelco Emergency Response Plan contains the following elements:
- Assessment of severity
- Determination of response required
- Mitigation of emergency
- Post Response Evaluation
- Feedback