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1 This document is valid for 15 months or until a new version will be drawn out
Genetically modified organisms*

For the production of sugar, sugar specialties, molasses and beet pulp, Cosun Beet Company only uses raw materials obtained from traditionally propagated plant species and no use is made of genetically modified organisms in the process.

All relevant precautions have been taken to prevent contamination with genetically modified organisms and/or their derivatives.
- The sugar, molasses and beet pulp from sugar factories Dinteloord and Vierverlaten are manufactured from sugar beet grown in The Netherlands, Germany and Belgium. In the European Union the growing of GMO beets is not permitted.
- The suppliers of (raw) cane sugars and of other carbohydrate raw materials (ingredients, additives) have to provide a GMO free statement.
- In the production of sugar, sugar specialties, molasses and beet pulp, no use is made of processing aids produced by means of genetic modification.
- The products are stored in dedicated storage facilities, hence they do not come in contact with any GMO material, should it be present.

Consequently, in compliance with Regulation (EC) no 1829/2003 and Regulation (EC) 1830/2003, no GMO labelling and traceability requirements are applicable for the products of Cosun Beet Company.

* Genetically modified organisms as defined in Directive 2001/18/EC

Food allergens

In Annex 1 under A an overview is given on the labelling of allergens with respect to sugar and sugar specialties as specified in Annex II of Regulation (EU) No. 1169/2011 on the provision of food information to consumers.

Of these substances or products causing allergies or intolerances, SO2 can be present as sulphur dioxide / sulphite is normally used in the sugar industry and can be present in ingredients. There are a few liquid sugar specialty products which have a SO2 content higher than 10 mg/kg and require allergen labelling on SO2. For the other liquid sugar products, granulated sugar and all dry sugar specialties generally no allergen labelling is required, the latest information is always included in the product specification.

Control measures to avoid cross contamination is part of our HACCP plan and includes:
- Process control at production lines where SO2 are present;
- Hygiene rules to avoid contamination at open product;
- Hygiene rules and dedicated areas where other allergens (milk, soy) are present;
- No offering of products with peanuts, nuts and/or sesame seed in the food vending machines at the specialty plants and sugar processing areas;
- Training of personnel for allergen awareness.

To the best of our knowledge, no other allergen labelling is necessary then specified in the product specifications.
Gluten

For the production of sugar and sugar specialties Cosun Beet Company does not use any ingredient for which gluten labelling is necessary according to Regulation (EU) 1169/2011 on the provision of food information to consumers, Annex II. Therefore there is no sugar or sugar specialty of Cosun Beet Company for which gluten labelling is required. With regards to the Annex of Implementing Regulation (EU) No 828/2014 on the requirements for the provision of information to consumers on the absence or reduced presence of gluten in food, though the products contain less than 20 mg/kg of gluten to the best of our knowledge, Cosun Beet Company does not label ‘gluten-free’ any of the products. Cosun Beet Company holds no ‘gluten free’ license or certification.

Ionizing radiation

We do not apply ionizing radiation, as described in Directive 1999/2/EG, on any of our products.

Nanomaterials

To the best of our knowledge, all delivered products don’t contain any raw materials, ingredients or additives (including non-declared substances, like processing aids, solvents, carriers) that are engineered nanomaterials.

Animal products & alcohol, Vegan & Vegetarian

Neither animal products, nor alcohol are used in the manufacture of our sugar, sugar products and sugar specialties, either as an ingredient or in the production processes. No bone char (=active coal produced out of animal bone) is used in any of the processes. This also applies to the raw cane sugar used as raw material in the sugar production, if any, and to the other ingredients for sugar specialties.

The sugar and sugar specialties of Cosun Beet Company are therefore suitable for vegans and vegetarians.

Natural status of sugar

The granulated sugar is produced by Cosun Beet Company from sugar plants of natural origin. The sucrose is extracted from the sugar plants with water, the extraction juice purified and evaporated until the sugar crystallizes. During this processing there is no chemical change of the sucrose and the granulated sugar is therefore considered natural.

Food contact packaging

General

For all primary packaging the suppliers have provided Cosun Beet Company with a declaration of compliance to

- Regulation (EC) No 1935/2004 on materials and articles intended to come into contact with food,
- Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food and for plastic materials additionally to
- Regulation (EC) No 10/2011 on plastic materials and articles intended to come into contact with food.

Based on the declarations provided, we confirm that the food contact packaging materials are suitable for the intended use, provided the products are stored under the conditions as specified in the product specifications of the sugar product(s) concerned.

Bisphenol A
To the best of our knowledge all our packaging complies to Regulation (EU) 2018/213 on the use of bisphenol A in varnishes and coatings intended to come into contact with food and amending Regulation (EU) No 10/2011 as regards the use of that substance in plastic food contact materials.

This is based on declarations of our packaging material suppliers either that the packaging material complies to regulation 2018/213, that bisphenol A is not intentionally used or that the packaging is free from bisphenol A.

Information on food defense and food fraud risk management
Policy of Cosun Beet Company is to take the necessary measures to minimize the risk of intentional adulteration or substitution.

Threat and vulnerability assessments have been carried out. These assessments include the authenticity of the food raw materials, the integrity of the manufacturing processes and the logistics. Our packed sugar products and sugar specialties are protected by the packaging, the bulk sugar and liquid products are protected by sealing of the load compartments.

Procedures are in place to ensure control of data and documents relating to the management of the TACCP & VACCP system. The assessments and procedures are reviewed annually, taking into account the developments.

Cosun Beet Company considers the assessments and related procedures as propriety and sensitive information and will not disclose these documents. These assessments and procedures are audited by DNV GL for our BRC certification. Additional audits are carried out by other certification bodies for products with claims, such as organic and fairtrade.

Residues of pesticides
As part of our food and feed safety management, sugar and molasses from the sugar production are monitored on residues to observe compliance with EU legislation concerned:
- Regulation (EC) No 396/2005 on maximum residue levels of pesticides in or on food and feed of plant and animal origin;
- Regulation (EC) No 1881/2006 setting maximum levels for certain contaminants in foodstuffs;

This monitoring program includes pesticide residues, heavy metals, dioxins, mycotoxins, in as far as limits for our products are specified in this legislation. Changes in the legislation are also followed up, specifically for sugar beet.
For the sugar specialties in generally not the products but the ingredients are monitored on contaminants and residues of pesticides to observe compliance with EU legislation. This is part of the so called RiskPlaza system and certification and supported by the Riskplaza scheme holder in which the Dutch Food Authority is involved.

Mineral oil

Cosun Beet Company is aware of the ongoing discussions about the concerns on the presence of mineral oil hydrocarbons (MOH) residues. At present there are no limits established in European food law, and to the best of our knowledge not in any member state, for the constituents investigated by EFSA\(^2\), mineral oil saturated hydrocarbons (MOSH) and mineral oil aromatic hydrocarbons (MOAH). This means that measures have to be taken to keep the entry of mineral oil hydrocarbons as low as reasonably achievable (ALARA).

In the production and packaging of granulated sugar and of sugar specialties, the following general and specific measures can be mentioned, relevant for mineral oil hydrocarbons:

- The beets are cleaned by washing before further processing and part of the further processing is a purification with lime.
- Lubricants which can come incidentally in contact with the product is food grade. Maintenance is carried out to keep the equipment in good condition and minimise the possibility for incidental contact.
- Paper bags packaging is not made with the use of recyclable paper and cardboard.
- Plastic bags packaging is not made with the use of recyclable materials.
- Printing inks used on the packaging supplied to us do not contain mineral oils.
- In the warehouses only use is made of electrically driven forklift trucks.

We will review the measures taken and extend our monitoring plans where necessary.

Information on EU regulation REACH (EU/1907/2006)

Herewith we inform you of the consequences of the EC regulation Registration, Evaluation and Authorisation of Chemicals (REACH) with regard to Cosun Beet Company sugar products.

In general, substances used in food, animal feed or human and veterinary medicines are exempted from registration and other obligations, in accordance with article 2, paragraph 5 of the REACH regulation. However, information on the substances as such or as specimen must be made available.

For applications other than stated above, the following applies to our sugar products.

\(^2\) Scientific Opinion on Mineral Oil Hydrocarbons in Food, EFSA Panel on Contaminants in the Food Chain (CONTAM), 28 August 2013
Sugar and liquid sugar
Saccharose (EINECS: 200-334-9, CAS: 57-50-1) has been explicitly included in Appendix IV of the REACH regulation and therefore, in accordance with article 2, paragraph 7a, registration of sugar and liquid sugar is not required.

Invert sugar syrups, liquid invert sugars and fructose syrups
Invert sugar has not been included in Appendix IV of the REACH regulation and has been registered by Cosun Beet Company. Fructose (EINECS: 200-333-3, CAS 57-48-7) is included in Appendix IV, registration is thus not required.

Molasses
Molasses is exempted from registration on the basis of Appendix V of REACH, natural substances section.

Sugar syrups, syrup blends, molasses syrup, purified molasses, soft sugar and icing sugar
For now, we assume that these products are not used other than in food, animal feed and/or medicines. Should you nevertheless have another application, we ask you to inform us accordingly.

Information on USA
In Annex 1 under B additional info is given on the allergens specified for the USA.

The granulated sugar, 7400 Industry syrup special and 2224 Icing sugar TCP to the best of our knowledge do not contain any of the chemicals considered or listed under California Proposition 65.
Annex 1. Information on presence of substances or products causing allergies or intolerances for which labeling is required for industrial products

A. EU Allergens

<table>
<thead>
<tr>
<th>Allergens – Annex II Regulation (EU) nr 1169/2011</th>
<th>In product Yes/No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cereals containing gluten, namely: wheat (such as spelt and khorasan wheat), rye, barley, oats or their hybridised strains, and products thereof, except:</td>
<td>No</td>
</tr>
<tr>
<td>(a) wheat based glucose syrups including dextrose (1);</td>
<td></td>
</tr>
<tr>
<td>(b) wheat based maltodextrins (1);</td>
<td></td>
</tr>
<tr>
<td>(c) glucose syrups based on barley;</td>
<td></td>
</tr>
<tr>
<td>(d) cereals used for making alcoholic distillates including ethyl alcohol of agricultural origin;</td>
<td></td>
</tr>
<tr>
<td>Crustaceans and products thereof;</td>
<td>No</td>
</tr>
<tr>
<td>Eggs and products thereof;</td>
<td>No</td>
</tr>
<tr>
<td>Fish and products thereof, except:</td>
<td>No</td>
</tr>
<tr>
<td>(a) fish gelatine used as carrier for vitamin or carotenoid preparations;</td>
<td></td>
</tr>
<tr>
<td>(b) fish gelatine or isinglass used as fining agent in beer and wine;</td>
<td></td>
</tr>
<tr>
<td>Peanuts and products thereof;</td>
<td>No</td>
</tr>
<tr>
<td>Soybeans and products thereof, except:</td>
<td>No (3)</td>
</tr>
<tr>
<td>(a) fully refined soybean oil and fat (1);</td>
<td></td>
</tr>
<tr>
<td>(b) natural mixed tocopherols (E306), natural D-alpha tocopherol, natural Dalpha tocopherol acetate, and natural D-alpha tocopherol succinate from soybean sources;</td>
<td></td>
</tr>
<tr>
<td>(c) vegetable oils derived phytosterols and phytosterol esters from soybean sources;</td>
<td></td>
</tr>
<tr>
<td>(d) plant stanol ester produced from vegetable oil sterols from soybean sources;</td>
<td></td>
</tr>
<tr>
<td>Milk and products thereof (including lactose), except:</td>
<td>No (3)</td>
</tr>
<tr>
<td>(a) whey used for making alcoholic distillates including ethyl alcohol of agricultural origin;</td>
<td></td>
</tr>
<tr>
<td>(b) lactitol;</td>
<td></td>
</tr>
<tr>
<td>Nuts, namely: almonds (Amygdalus communis L.), hazelnuts (Corylus avellana), walnuts (Juglans regia), cashews (Anacardium occidentale), pecan nuts (Carya illinoinsensis (Wangenh.) K. Koch), Brazil nuts (Bertholletia excelsa), pistachio nuts (Pistacia vera), macademia or Queensland nuts (Macadamia ternifolia), and products thereof, except:</td>
<td>No</td>
</tr>
<tr>
<td>(a) nuts used for making alcoholic distillates including ethyl alcohol of agricultural origin;</td>
<td></td>
</tr>
<tr>
<td>Celery and products thereof;</td>
<td>No</td>
</tr>
<tr>
<td>Mustard and products thereof;</td>
<td>No</td>
</tr>
<tr>
<td>Sesame seeds and products thereof;</td>
<td>No</td>
</tr>
<tr>
<td>Sulphur dioxide and sulphites at concentrations of more than 10 mg/kg or 10 mg/litre in terms of the total SO2 (2):</td>
<td>No</td>
</tr>
<tr>
<td>- Sugar and dry sugar specialties;</td>
<td>See product specification</td>
</tr>
<tr>
<td>- Liquid sugar, Liquid invert sugar; Invert sugar syrup;</td>
<td></td>
</tr>
<tr>
<td>- Other liquid products;</td>
<td></td>
</tr>
<tr>
<td>Lupin and products thereof;</td>
<td>No</td>
</tr>
<tr>
<td>Molluscs and products thereof.</td>
<td>No</td>
</tr>
</tbody>
</table>

3 Note: The information on the product specification is leading.
(1) And the products thereof, in so far as the process that they have undergone is not likely to increase the level of allergenicity assessed by the Authority for the relevant product from which they originated.

(2) Sulphur dioxide is normally used in the sugar industry and is present in and some ingredients. The production is managed so almost every product has a SO2 content below 10 mg/kg. This is the case for all of our dry sugar products. However some liquid sugar products have a higher SO2 content. This is indicated in the product specification.

(3) In one consumer product, chocolate syrup, ingredients of milk and soy are present. This product is packed in a consumer product dedicated area.

B. Additional information on granulated sugar

The granulated sugar produced in Dinteloord and Vierverlaten to the best of our knowledge does not contain any of the substances mentioned in the table below, neither as ingredient nor as cross-contamination.

<table>
<thead>
<tr>
<th>Almond (Prunus dulcis)</th>
<th>Hickory nut (Carya spp.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Beech nut (Fagus spp.)</td>
<td>Lichee nut (Litchi chinensis Sonn.)</td>
</tr>
<tr>
<td>Brazil nut (Bertholletia excelsa)</td>
<td>Macadamia nut/Bush nut (Macadamia spp.)</td>
</tr>
<tr>
<td>Butternut (Juglans cinerea)</td>
<td>Pecan (Carya illinoensis)</td>
</tr>
<tr>
<td>Cashew (Anacardium occidentale)</td>
<td>Pine nut/Pinon nut (Pinus spp.)</td>
</tr>
<tr>
<td>Chestnut (Chinese, American, European, Seguin) (Castanea spp.)</td>
<td>Pili nut (Canarium ovatum Engl. in A. DC)</td>
</tr>
<tr>
<td>Chinquapin (Castanea pumila)</td>
<td>Pistachio (Pistacia vera L.)</td>
</tr>
<tr>
<td>Coconut (Cocos nucifera L.)</td>
<td>Sheanut (Vitellaria paradoxa C.F. Gaertn.)</td>
</tr>
<tr>
<td>Filbert/hazelnut (Corylus spp.)</td>
<td>Walnut (English, Persian, Black, Japanese, California), Heartnut, Butternut (Juglans spp.)</td>
</tr>
<tr>
<td>Ginko nut (Ginkgo biloba L.)</td>
<td></td>
</tr>
</tbody>
</table>