

# T L C

INGREDIENTS

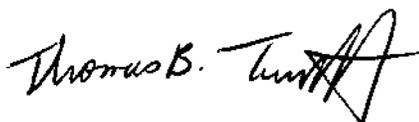
## TLC Ingredients Sustainability and Corporate Social Responsibility Policy

TLC Ingredients is committed to responsibly distributing chemicals and food ingredients and to working with our suppliers and customers to protect the environment, support our employees, and give back to our community. We will strive to make the right decisions so that all of us are proud of our company and the impact that we have on the world around us.

It might seem counterintuitive that a chemical distributor promotes sustainability. But it's really not; it is simply the right thing to do. We influence in small—yet important—ways how the products we distribute are selected and used.

As a company, we stand together in our efforts to do the right thing, and demonstrate our dedication through the corporate sustainability and social responsibility elements listed below and further detailed in the attached policy:

- Responsible Distribution
- Sustainable Supply Chain
- Facilities and Operations
- Sustainable and Responsible Products
- Waste Management, Recycling, and Packaging
- Community Outreach



Signed by: \_\_\_\_\_

Date: 03/06/13

**Sustainability &  
Corporate Social Responsibility Elements**

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| <p><b>Responsible Distribution™</b></p> | <p>Responsible Distribution™ (RD) is a widely recognized, third-party-verified environmental, health, safety &amp; security program set forth by the National Association of Chemical Distributors (NACD). TLC has achieved RD third-party verification to demonstrate our commitment to continuous performance improvement in every phase of chemical storage, handling, transportation, and disposal.</p> <p>NACD member companies' safety rating is 80% better than non-member chemical distribution companies and more than twice as good as all manufacturing combined.</p> <p>TLC's RD verification reinforces our sensitivity and responsiveness to public concerns, and helps our organization be a recognized leader in the areas of health and safety, environmental stewardship, and quality.</p> <p>Under RD, it is TLC's policy to promote ongoing improvements in chemical distribution safety through policy, communications, and management oversight.</p>   |
| <p><b>Sustainable Supply Chain</b></p>  | <p>TLC Ingredients sells and distributes food ingredients and chemicals in a variety of industries. Because we primarily resell products in the same form in which they come to us from the manufacturer, our sustainability commitment is based largely on our suppliers and their sustainability practices.</p> <ul style="list-style-type: none"> <li>• We believe in supporting U.S.-based companies and encouraging employment of U.S. workers; therefore, we elect to work with U.S.-based suppliers to the extent possible. We embrace the “buy local” concept to reduce the economic and environmental (i.e., greenhouse gas emissions) impacts associated with transporting products.</li> <li>• We have an active program of surveying our suppliers to assess their commitments to sustainability and corporate social responsibility. Our preference is to do business with companies that have sustainability policies. Our key suppliers and their sustainability statements include the following (extracted from supplier websites):             <ul style="list-style-type: none"> <li>○ Archer Daniels Midland (<a href="http://www.adm.com/en-US/responsibility/2011CR/Pages/default.aspx">http://www.adm.com/en-US/responsibility/2011CR/Pages/default.aspx</a>): To realize our vision of being the world's most admired agri-business we are intent on creating value while growing responsibly. That's why our 30,000 colleagues are working to continuously improve our environmental performance, establish a sustainable supply chain for the crops we source, and ensure that our capital investments, social investments and investments in people help us fulfill our vital purpose.</li> <li>○ AkzoNobel (<a href="http://www.akzonobel.com/us/sustainability/">http://www.akzonobel.com/us/sustainability/</a>): We're committed to delivering sustainable products and solutions to our customers. But of course, we can only do this if sustainability is at the heart of everything we do. That's why we've integrated sustainability into every area of our business - for the benefit of our clients, shareholders, employees and the world around us</li> <li>○ PQ Corporation (<a href="http://pqcorp.com/HealthSafetybrEnvironment/tabid/316/language/en-US/Default.aspx">http://pqcorp.com/HealthSafetybrEnvironment/tabid/316/language/en-US/Default.aspx</a>): Our highest priority is to manufacture, market and distribute products in a responsible manner that protects the environment and safeguards the health, safety and security of employees, contractors,</li> </ul> </li> </ul> |

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|  | <p>customers and the community.</p> <ul style="list-style-type: none"> <li>○ Huntsman (<a href="http://www.huntsman.com/corporate/a/Sustainability">http://www.huntsman.com/corporate/a/Sustainability</a>): Huntsman enriches lives through innovation by developing and manufacturing products that not only create value for our stakeholders today, but also make a vibrant world possible for future generations.</li> </ul>   |
| <p><b>Ongoing Regulatory Responsibility &amp; Compliance</b></p> | <ul style="list-style-type: none"> <li>• As a member of the NACD, TLC is committed to the Risk Management Code of RD. Risk management activities relating to the NACD RD consist of regular reviews of manufacturers' safety data sheets (SDS) to understand the potential human and environmental hazards of our products.</li> <li>• The Public Health Security and Bioterrorism Preparedness and Response Act require chemical suppliers to conduct vulnerability assessments. NACD's Responsible Distribution has also enacted security provisions to promote the safe transportation of chemicals. All TLC employees must comply with applicable security provisions. Compliance is measured through questionnaires and on-site auditing,</li> <li>• TLC is also committed to the Compliance Review and Training Code of RD, which includes a process for the following:             <ul style="list-style-type: none"> <li>○ Monitoring and implementing regulations and industry standards for their application to chemical distribution activities.</li> <li>○ Training all employees in the implementation of applicable regulations, as well as TLC-specific requirements.</li> </ul> </li> </ul>          |
| <p><b>Facilities and Operations</b></p>                          | <p>In the fall of 2009, TLC moved to our offices and logistics facilities. The new site features state-of-the-art capabilities designed to maximize energy efficiencies, including various types of segregated product storage. All were designed with the latest requirements from the Department of Homeland Security, the U.S. EPA, OSHA, NACD, and various other regulating bodies in mind.</p> <p>We operate our facilities to achieve high productivity, while conserving resources, ensuring a safe workplace, and reducing waste. For example:</p> <ul style="list-style-type: none"> <li>• We have implemented a number of energy-saving measures at our facility, including motion sensors for lighting throughout the building, low-flow plumbing fixtures and energy-efficient light bulbs in our warehouse.</li> <li>• It is our policy to use contract warehouses that have documented procedures, third-party-verified audits, and employee conformance training to ensure that TLC's product is handled and stored in a safe and responsible manner.</li> <li>• TLC has implemented applicable good manufacturing practices (GMPs) to ensure the highest level of food safety and quality.</li> </ul> |

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| <p><b>Sustainable and Responsible Products</b></p>       | <p>TLC has partnered with a number of key, forward-thinking suppliers to offer more sustainable and responsible product alternatives to the marketplace. For example, we are proud to offer bio-based chemicals, which are designed to reduce greenhouse gas (GHG) emissions, to the food and industrial sectors. Where possible, we work with our customers to promote the use of more biodegradable and/or less toxic alternatives to traditional raw materials.</p>  |
| <p><b>Waste Management, Recycling, and Packaging</b></p> | <p>TLC's policy is to handle and manage our waste in a safe manner, and to comply with all U.S. EPA standards. Our waste management policy includes waste disposal requirements and waste reduction measures.</p> <p>We have instituted a recycling initiative within our facilities to recycle paper, aluminum cans, and plastic. All employees are expected to comply with this program at work and are encouraged to follow the same philosophy at home.</p> <p>In addition, TLC uses recycled packaging as much as possible. Examples include the use of rebottled tote bins for food-grade products and the use of reconditioned drums and totes for industrial-grade products.</p>  |
| <p><b>Employees</b></p>                                  | <p>We maintain a safe and healthy work environment that promotes the well-being of employees and visitors, as well as our neighboring communities.</p> <p>Health and safety is an integral part of our operations. We have long been committed to the implementation of safe work practices to ensure that our employees return home safely at the end of each day. In addition, our policy requires that we provide training to all of our employees on all job procedures relative to our distribution activities, including hazard communication training. Because of this commitment and our focus on maintaining the highest level of safety throughout our operations, we are proud to maintain an excellent safety record.</p>   |
| <p><b>Community Outreach</b></p>                         | <p>TLC takes seriously our responsibility to the chemical community and the community at large. We participate in a number of associations to advance our industry and the industries that we serve. For example, we are very active in the Chemical Education Foundation (CEF), supporting the organization's commitment to promoting science education to tomorrow's leaders. Specifically, we actively promote CEF's flagship program, the <i>You Be the Chemist</i> challenge.</p> <p>We understand the importance of giving back to the communities in which we live and work. We encourage TLC employees to get involved in helping charities, schools, or other service organizations of their choice by granting each employee one paid day off per year to volunteer in our community.</p> |