



August 1, 2017

Subject: Gluten Status Statement

To whom it may concern,

Hazard Analysis of Critical Control Points (HACCP) is a process of assessing the various hazards and risks in a manufacturing or supply chain operation, determining the points where controls can be applied to eliminate or reduce those hazards to an acceptable level, to establish control ranges and limits for monitoring the manufacturing or supply chain operation, and to establish a monitoring frequency based on risk. HACCP is a commonly accepted tool to assess an operation or supply chain for food safety risks.

The Food Safety Modernization Act (FSMA) introduced the concept of Hazard Analysis and Risk Based Preventative Controls (HARPC) for food safety. HACCP is the accepted risk assessment tool for HARPC. FDA is expected to finalize HARPC regulations in 2015.

We recognize the need to conduct a formal risk assessment of our manufacturing operations and supply chain activities. Detrex has engaged a consultant to assist us in bringing our operation into compliance with FSMA and HARPC. As part of this process we will be conducting a HACCP and identifying and developing risk based preventative controls.

Detrex Chemical's manufacturing process is a continuous process operation. We do not run a batch operation. Therefore, we are required to continuously operate our process to the most stringent set of product and analytical criteria for the various grades of product we manufacture. While we have not yet formally assessed our process and supply chain risks, many of the procedures and control measures we currently have in place exist to meet FDA regulations for the manufacture of food and drug grade products. We believe we have already implemented many of the key control measures that a formal risk assessment or HACCP would likely identify.

We expect to have our HACCP and food safety plan completed by 3QTR 2015.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jim Vence", written over a horizontal line.

Jim Vence  
Technical Director  
Detrex Chemicals