SÍ CLEAN LABEL STANDARD

# INTRODUCTION

# **PURPOSE:**

Natural Sourcing International (NSI) has established the Clean Label Standard – including the following "Limited Nutrients", "Unacceptable Ingredients", and "Nutrient Profiling System" – to guide the evolution of our product portfolio. In line with our company mission to "make organic & natural food available for all," NSI aims to responsibly source and develop all products in order to increase accessibility and affordability of foods that help consumers follow a healthy dietary pattern.

Our team of industry experts have reviewed international nutrition science and public health recommendations to inform these guidelines. All products are to be developed with the goal of meeting these criteria to ensure that consumers have an appropriate choice in the context of a balanced diet. NSI's strategy is to offer products that have proven superiority in taste, nutritional value, quality, sustainability and innovation.

### **GENERAL PRINCIPLES:**

The following are recommendations from the 2020-2025 Dietary Guidelines for Americans and underline the principles we consider in the development of our product portfolio:

- 1. Follow a healthy dietary pattern at every life stage.
- 2. Customize and enjoy nutrient-dense food and beverage choices to reflect personal preferences, cultural traditions, and budgetary considerations.
- 3. Focus on meeting food group needs with nutrient-dense foods and beverages, and stay within calorie limits.
- 4. Limit foods and beverages higher in added sugars, saturated fat, and sodium, and limit alcoholic beverages.

To get the most out of the Nutrition Facts label and to better understand the NSI Clean Label Standard, follow these key recommendations:

- Look at the number of servings per container and serving size first. Use that information to determine how much of the product fits into a healthy overall diet.
- Aim to stay under 100% DV of things like sodium, saturated fat, and added sugars over the day. Try to consume 0g of trans fat if possible.
- Aim to reach 100% DV of dietary fiber, vitamin D, calcium, iron and potassium.
- For grain-rich products, aim for products with at least one gram of fiber for every 10 grams of carbohydrate.

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# LIMITED NUTRIENTS

# BACKGROUND:

For its entire product portfolio, NSI has established criteria health-sensitive nutrients in relation to the Daily Values referenced below:

Table 1: Dailv Reference	Values for health-sensitive nutrients
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Food Component	Saturated Fat	Trans Fat	Added Sugars	Sodium
Daily Value	<20g	0g (<1% of energy)	<50g	<2,300mg

"Daily Values (DV)" are the recommended amounts of nutrients to consume or not to exceed each day and are listed on the Nutrition and Supplement Facts labels. The "% Daily Values (% DV)" is how much a nutrient in a single serving of an individual packaged food or dietary supplement contributes to your daily diet.

As a general guide:

- 5% DV or less of a nutrient per serving is considered low
- 20% DV or more of a nutrient per serving is considered high

# CRITERIA:

NSI limits certain health-sensitive nutrients in product sourcing and development according to the following criteria:

#### Table 2: NSI Limited Nutrients

Saturated Fat	NSI products shall not exceed saturated fat content of 20% of the Daily Value or 4g (per serving)*
	The Daily Reference Values recommend consuming less than 20 grams of saturated fats per day. Unsaturated fats such as polyunsaturated fats (PUFAs) and monounsaturated fatty acids (MUFAs) are known to raise levels of good cholesterol (HDL) and can be beneficial for heart health. NSI offers a full product line-up with heart-healthy fat sources and considers saturated fat levels in product development.
	*This criterion excludes NSI products that are considered "added fats." These products, such as oils, butters, milks, creams and certain supplements, are sold as finished products, but should be consumed as recipe ingredients in moderation due to their high levels of saturated fats (exceeding 20% DV/serving).

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Trans Fat	NSI products shall not contain trans fat.				
	Trans fat are unsaturated fatty acids that come from either natural or industrial sources. Naturally-occurring trans fat comes from ruminants (cows and sheep). Industrially-produced trans fat is formed in an industrial process that adds hydrogen to vegetable oil converting the liquid into a solid, resulting in "partially hydrogenated" oil (PHO). Trans fat has no known health benefits and increases LDL ("bad") cholesterol levels while lowering HDL ("good") cholesterol levels.				
Added Sugars	NSI products shall not exceed added sugar content of 10% of the Daily Value or 5g (per serving)**				
	The Daily Reference Values recommend reducing added sugar intake to 10% of total daily caloric intake. For the average adult (at a calorie intake of 2,000 kcal) this translates to a suggested limit of 50g (or 10 teaspoons) of sugar per day.				
	Products such as whole fruits and vegetables contain naturally occurring sugars that are safe and healthy sources of energy for the body.				
	**This criterion excludes NSI products that are developed for "sports nutrition". These products such as hydration mixes, sports drinks, or other related supplements aim to replenish glucose, fluids, and electrolytes lost during strenuous exercise and enhance endurance.				
Sodium	NSI products shall not exceed sodium content of 10% of the Daily Value or 230mg (per serving)***				
	The Daily Reference Value for sodium is less than 2,300 mg per day. This is equal to about 1 teaspoon of salt.				
	***This criterion excludes NSI products that are considered accessories. These products such as, dressings, flavoring, sauces, seasonings and bouillons, are sold as finished products, but should be consumed in moderation due to higher levels of sodium.				

NSI reserves the right to update these criteria as nutrition science and public health recommendations evolve.

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# **UNACCEPTABLE INGREDIENTS**

## BACKGROUND:

To guide the integrity of our new product development process, NSI has established a list of Unacceptable Ingredients. We aim to responsibly source and develop all products in accordance with emerging research and our customers' expectations.

There are two categories of Unacceptable Ingredients that we review in our product development process:

- Banned Ingredients: not acceptable for use in any case
- Avoided Ingredients: further evaluation is needed to validate the ingredient production and use case

NSI's strategy is to offer products that have proven superiority in taste, nutritional value, quality, sustainability and innovation. That's why we've banned all Non-GRAS ingredients, partially hydrogenated oils, high-fructose corn syrup, artificial sweeteners, artificial flavors & artificial colors — along with more than 180 colors, preservatives, flavors and other ingredients.

### **CRITERIA:**

#### Table 3: NSI Banned Ingredients

Banned Ingredients				
Acesulfame K (Acesulfame Potassium, Sunett, Sweet One) Acetylated ester of mono- and diglycerides Aluminum Based Compounds Ammonium Chloride Ammonium Saccharin Anisole Antibiotics Aspartame (Equal, NutraSweet) Astaxanthin Autolyzed Yeast Extract (AYE, Yeast Autolyzate/Autolysate) Azo Dyes Azodicarbonamide (ADA) Bentonite Benzoates (Calcium Benzoate, Sodium Benzoate, Potassium Benzoate, Benzyl Benzoate) Benzoic acid Benzophenone Benzyl alcohol BHA (butylated hydroxyanisole) BHT (butylated hydroxytoluene) Bisulfates (Sodium bisulfate, Potassium bisulfate) Bisulfates (Sodium bisulfate, Potassium bisulfate) Bisulfites Bleached flour Bovine Somatotropin Hormone (BST, Bovine Growth Hormone)	Gold/Gold Leaf High Fructose Corn Syrup (HFCS, Isoglucose, Glucose Fructose Syrup) Hydrogenated fats & oils Hydrolyzed Vegetable Protein (HVP) Iron Oxides LACTEM (Lactic Acid Esters of Mono and Diglycerides) Lye (Sodium Hydroxide) Mechanically separated meat Methyl silicon Methylene chloride (Chloromethane) Microparticularized whey protein (Simplesse) Monosodium glutamate (MSG) Natamycin Nature Identical Colors and Flavors Neotame (Newtame) Nitrates and Nitrites (Potassium nitrate/nitrite, Sodium nitrate/nitrite) Octyl gallate Olean (Olestra, Sucrose Polyester, Sucrose Esters) Oxystearin Parabens (methylparaben, propylparaben, butylparaben) Partially hydrogenated fats and oils (PHOs) Peroxides (Acetone, Benzoyl, Calcium)			

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Bromated flour Bromates (Potassium Bromate, Calcium Bromate) Brominated vegetable oil (BVO) Butylated Hydroxyanisole (BHA) Butylated Hydroxytoluene (BHT) Calcium disodium EDTA Calcium Saccharin Calcium stearoyl-2-lactylate Caprocaprylobehenin (Caprenin) Caramel Colors (or Caramel added for color; Organic Caramel Color is acceptable) Carmine (Crimson Lake, Cochineal, Natural Red 4) Carrageenan Cottonseed Oil Cyclamates (Sodium Cyclamate) Cysteine (L-cysteine), as an additive for bread products DATEM (Diacetyl tartaric and fatty acid esters of mono and diglycerides) Diacetyl Diacetyltartaric Dimethyl silicone (dimethicone, dimethylpolysiloxane) Dimethylamylamine (DMAA) Dioctyl sodium sulfosuccinate (DSS) Disodium guanylate (GMP; isonite and Inosine monophosphate, IMP) EDTA (Disodium calcium EDTA, Disodium Dihydrogen EDTA, Calcium Disodium EDTA, Tetrasodium EDTA) Erythorbic acid (erythorbates) Erythrosine Esters of sucrose (Hexa-, hepta- and octa-) Ethanol, ethyl alcohol Ethoxylated mono and diglycerides (EMG) Ethoxyquin Ethyl acrylate (synthetic) Ethylene glycol Ethylene oxide (ETO) Ethoxyauin (EQ) Eugenyl methyl ether (synthetic) FD&C Colors Ferrocyanides (Sodium [E535], Potassium [E536], Calcium [E538]) Garcinia cambogia Gardenia blue

Petroleum and Petroleum By-Products (Mineral Oil) Polydextrose (Litesse) Polyethylene Glycol Polysorbates Potassium hydroxide Propionates (calcium, potassium and sodium) Propionic acid (synthetic) Propyl gallate Propylene glycol esters of fatty acids (Propylene Glycol, Propane-1,2-diol esters of fatty acids) Propylene oxide Pulegone (synthetic) Pvridine (svnthetic) Saccharin sodium salt (Sodium Saccharin) Salatrim (short and long chain acyl triglyceride molecule) Shark cartilage Smoke Flavoring (natural smoke flavoring is acceptable) Sodium diacetate Sodium Lauryl Sulfate (SLS) Sodium metabisulfite Sodium ribonucleotides (Disodium Ribonucleotides) Sodium stearoyl lactylate (Sodium stearoyl-2-lactylate) Sodium Tripolyphosphate (STPP, Sodium triphosphate, STP, Tripolyphosphate) Solvent extracted oils, as stand alone single-ingredient oils (except grapeseed oil) Sorbates (Calcium, Potassium and Sodium) Sorbic acid Stannous Chloride Succistearin Sucralose (Splenda) Sucroglycerides Sulfites (Sodium, Potassium and Ammonia) Sulfur dioxide Tagatose Tartrazine TBHQ (tertiary butylhydroquinone) Toluene Tonka bean/extract Trans fatty acids Vanillin (Ethyl Vanillin) Whale Oil

#### Table 4: NSI Avoided Ingredients

#### **Avoided Ingredients**

2,4,5-trihydroxybutyrophenone (*THBP*) 5-HTP (*5-Hydroxytryptophan, Oxitriptan*) Acetoin (*synthetic*) Alkanna tinctoria Ammonium sulfate Apricot kernel/extract Bacopa Benzaldehyde Irradiated Ingredients Kava/kava kava Ma huang Malic Acid (*DL-Malic Acid, D-Malic Acid*) Melatonin Modified food starch (acceptable if not chemically modified) Monoammonium glutamate Monoglycerides

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Beta-cyclodextrin Black soldier fly Caffeine (extended release) Calcium Hydroxide/Lime Canthaxanthin CBD/cannabidiol Charcoal (Activated Charcoal, Charcoal Powder) Corn Syrup Crystalline Fructose Diglycerides **Disodium succinate** Dodecyl gallate Foie gras Gamma aminobutyric acid (GABA) Grapefruit seed extract Hawaiian black salt He shou wu Hjijiki Hydroxpropyl guar gum Insect Flour

Mucuna pruriens Myrcene (synthetic) Palm Oil/Palm Kernel Oil and all derivatives (RSPO certified only) Plant sterols Polyglycerol Esters of Fatty Acids Polyglycerol Polyricinolate (PGPR) Pomace Oil Protein Hydrolysates Sodium Acid Pyrophosphate (SAPP; Disodium Diphosphate) Sodium acid sulfate Sodium Ervthorbate Sodium fluoride Sorbitan Monostearate (SMS) Soy leghemoglobin Sucrose acetate isobutyrate Thiodipropionic acid Triacetin; Glyceryl Triacetate Triclosan

NSI reserves the right to update these criteria as nutrition science and public health recommendations evolve.

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# NUTRIENT PROFILING SYSTEM

# BACKGROUND:

NSI has implemented a Nutrient Profiling System to guide the evolution of our product portfolio. This system is derived from the Nutri-Score, which was developed by French health authorities in accordance with the UK Food Standards Agency (FSA). The nutritional score is calculated using the nutritional data listed on the nutrition facts panel for 100g of the product, whose nutrients form part of the mandatory nutritional declaration or are included as supplemental information:

- Calories (kJ)
- Amount of fat (g)
- Amount of saturated fatty acids (g)
- Amount of carbohydrates (g)
- Amount of sodium (mg)
- Amount of sugars (g)
- Amount of protein (g)
- Fiber (g)

The score comprises two dimensions:

- 1. Positive Points: corresponding to the favorable components, an adequate amount of which is considered healthy (percent fruit/vegetable, protein and fiber)
- 2. Negative Points: corresponding to the unfavorable components, an excess of which is considered unhealthy (calories, sugars, sodium and saturated fatty acids)

The final score is calculated using the following guidance:

- **Positive Points:** Between 0 and 5 points are awarded for the 3 favorable components, based on the amount in 100g of the food (maximum of 15). Points are assigned based on the reference intake for the nutrient in question. First, the favorable components are totaled, resulting in a number of positive points.
- **Negative Points:** Between -10 and 0 points are awarded for each of these 4 unfavorable components, based on the amount in 100g of the food (maximum of -40). For products considered added fats (oils, butters, creams, milks), calculate saturated fat score based on the total saturated fatty acid/lipid component (as a percentage).
- **Final Calculation:** In general, the positive and negative points are summed to calculate the final score.
  - However, if the total for fruits and vegetables is less than 5, then the nutritional score is equal to the total negative points plus the sum of the points for fibers and fruits and vegetables. In this case, the protein content is therefore not counted in the calculation of the nutritional score.

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# **CRITERIA:**

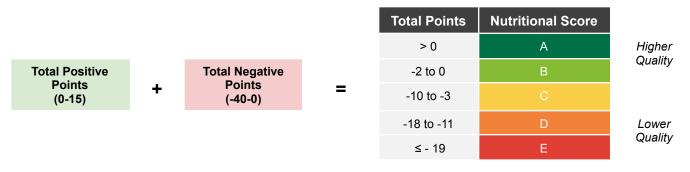
Points	Fruits, veg (%)	Fiber (g)	Protein (g)
0	≤ 40	≤ 0.9	≤ 1.6
1	> 40	> 0.9	> 1.6
2	> 60	> 1.9	> 3.2
3	-	> 2.8	> 4.8
4	-	> 3.7	> 6.4
5	> 80	> 4.7	> 8.0

Table 5: Points assigned for nutrients that have a positive impact

### Table 6: Points assigned for nutrients that have a negative impact

Points	Calories (kJ)	Sugars (g)	Saturated fats (g)	Added fats:	Sodium (mg)
0	≤ 335	≤ 4.5	≤ 1	< 10	≤ 90
-1	> 335	> 4.5	> 1	<16	> 90
-2	> 670	> 9	> 2	< 22	> 180
-3	> 1005	> 13.5	> 3	< 28	> 270
-4	> 1340	> 18	> 4	< 34	> 360
-5	> 1675	> 22.5	> 5	< 40	> 450
-6	> 2010	> 27	> 6	< 46	> 540
-7	> 2345	> 31	> 7	< 52	> 630
-8	> 2680	> 36	> 8	< 58	> 720
-9	> 3015	> 40	> 9	< 64	> 810
-10	> 3350	> 45	> 10	> 64	> 900

The point table generally used to calculate the final nutritional score is as follows:



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# GLOSSARY

**Nutritional factor**: Any of the food constituents on which a food product is assessed, e.g. energy, public health sensitive nutrients, total fat, dietary fiber, protein, vitamins, minerals or raw material with high intrinsic nutritional value (whole grain, fruits, etc.).

**Percent Daily Values (% DV):** Provided on the right-hand side of the Nutrition Facts panel; designed to help consumers to see how a product fits into their overall dietary pattern

**Daily Reference Values:** A set of dietary references, expressed per day, based on WHO and/or other worldwide recognized guidelines on nutrient intake from health authorities; used to calculate the % DV

**Energy**: Total energy that is metabolized, calculated from energy-producing food components.

Added sugars: Syrups and other caloric sweeteners used as a sweetener in other food products. Naturally occurring sugars such as those in fruit or milk are not added sugars. Specific examples of added sugars that can be listed as an ingredient include brown sugar, corn sweetener, corn syrup, dextrose, fructose, glucose, high-fructose corn syrup, honey, invert sugar, lactose, malt sugar, malt syrup, maltose, molasses, raw sugar sucrose, trehalose, and turbinado sugar.

**Fiber:** a type of carbohydrate that the body cannot digest; helps regulate the body's use of sugars, helping to keep hunger and blood sugar in check

**Protein:** one of the macronutrients; a major functional and structural component of every animal cell; composed of amino acids

**Essential Amino Acid:** the nine amino acids that cannot be produced by the human body and therefore must be consumed in the diet

**Non-Essential Amino Acid:** the eleven amino acids that can be produced by the human body

**Sodium:** All sodium content in a food product. It includes sodium from sodium chloride (salt) and sodium bicarbonate, as well as sodium from any other form present in a food product, e.g. monosodium glutamate, sodium phosphate, sodium carbonate and sodium benzoate etc.

**Total fat:** Total lipid content of a product: as the sum of triglycerides, phospholipids, glycolipids, mono and diglycerides.

**Saturated fatty acids**: Fatty acids that have no double bonds. Fats high in saturated fatty acids are usually solid at room temperature.

**Trans fatty acids**: Unsaturated fatty acids that are structurally different from the unsaturated fatty acids that occur naturally in plant foods. Sources of trans fatty acids include partially hydrogenated vegetable oils used in processed foods such as desserts, margarines, etc. and foods that come from ruminant animals (cattle & sheep).

**Unsaturated fatty acids:** all polyunsaturated and monounsaturated fats that are typically referred to as "healthy fats"; liquid at room temperature (oils)

**Omega-3 and omega-6 fatty acids:** unsaturated fatty acids that are essential in the diet because they cannot be naturally produced by humans. Primary sources include flaxseed, chia seed, and hemp seed.

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