



## Linking Sustainability to Executive Compensation

This year, we also made progress on our efforts to link executive compensation to our sustainability performance. Our executive leadership team now has direct measurements tied to the company performance in safety, carbon emissions reductions and sustainable sourcing progress. While Ingredion employees have had a long-standing link in compensation to safety performance, this marks a further evolution in aligning with some of the key targets in our All Life plan.

## Business Integrity Program

Ingredion's ethics and compliance program is called "Business Integrity" because our values center on integrity: trust and integrity are the essential ingredients to our program. Our Business Integrity program is robust and comprehensive, designed to support employees' understanding of legal requirements and operating our business responsibly, ethically and with integrity.

We operationalize our Business Integrity Program through three strategic pillars: governance, risk and culture.

### The Business Integrity Program



#### Governance Oversight and Accountability

Build accountability with an Owner's Mindset for our employees, customers and stakeholders.



#### Risk Proactive Risk Management

Drive strong cross-functional leadership and build functional partnerships to increase accountability to manage risks.



#### Culture Engagement and Learning

Promote a culture of compliance and ethical conduct.

The Business Integrity program supports our values-based culture in all our operations, building high performance with integrity and helping our employees manage risk with confidence. We do this by:

- Providing advice, training and raising awareness among Ingredion employees on integrity and compliance-related topics.
- Establishing risk-based due diligence processes in relation to new and existing counter-parties.
- Collaborating with and supporting other Ingredion functions to ensure the organization's requirements on ethics, integrity, anti-corruption and other risk issues are appropriately implemented.
- Receiving and investigating reports on integrity violations and non-compliance.
- Developing policies, procedures, job aids that provide guidance on business practice risks, integrity and ethics.
- Performing risk assessments and developing appropriate remediation plans.
- Delivering on operational priorities that the Business Integrity team deems appropriate to support the program's objective to deliver a robust, risk-based compliance and ethics program that will inform, engage and inspire our employees deliver high performance with integrity.



## Executive Business Integrity and Segment Committees

To facilitate the effective operation of the Business Integrity Program, Ingredion has established a center-led program of compliance policies, standards and procedures. The Integrity Program is led at the corporate level by the Executive Business Integrity Committee (EBIC). The EBIC and Business Segment Committees oversee the integration of the program in each geography in which the Company operates. Their leadership promotes compliance and ethical business practices and fosters our Speak Up! culture, so that suspected violations of law and policy are promptly reviewed and investigated. Business Integrity's procedures include certifications of compliance, audits, seminars or such other programs as appropriate for a specific risk issue.

2024

### Highlight: Empowering Our **Speak Up!** Culture with Reach and Impact

Business Integrity delivers ethics and compliance education, training and tools that help manage risk, protect reputation and reinforce our inclusive culture, which empowers us to live our values, deliver on Ingredion's purpose and foster the shared trust and accountability essential to Ingredion's success.



### Governance Highlights: Core Policies and Training

In 2024, we updated our values-based Code of Conduct to provide greater guidance on risk issues, such as data security and artificial intelligence. Ingredion's purpose-driven, people-centric growth culture is guided by our values-based Code of Conduct, entitled, "Living Our Values." Published in 12 languages, the Code is the foundational document of our risk-based, values-driven Business Integrity, Ethics and Compliance Program (Business Integrity Program). Our Code is supported by several core business practice policies, from which we delivered required manager and employee training:



SEE OUR CODE OF CONDUCT  
**Living Our Values**

- **Anti-Bribery and Corruption:** We have strict anti-corruption policies and related procedures, such as the Anti-Corruption Due Diligence Process, which are designed to ensure compliance with the U.S. Foreign Corrupt Practices Act and local anti-bribery laws.
- **Speaking Up/Non-Retaliation:** Reinforcing our open door, speak up culture, we welcome, encourage and support our employees in asking questions and raising concerns with zero tolerance for retaliation.
- **Supplier Code of Conduct:** We expect our suppliers to share our core values, comply with all laws applicable to doing business with us and implement responsible and ethical business practices consistent with our core values.



## Additional Governance Highlights: Core Policies and Training

- Competing Fairly:** Ingredion is committed to competing ethically and complying with the letter and spirit of all applicable antitrust, or “competition,” laws and regulations in the countries where it does business. Our antitrust policy underscores the importance of compliance with competition laws.
- Anti-Harassment and Discrimination:** Reinforcing our commitment to our Everyone Belongs Value, we do not tolerate discriminatory or harassing behavior by employees, customers, vendors, agents or any third parties conducting business with the Company.
- Human Rights:** As a leading plant-based food ingredients company, we recognize our global responsibility to uphold the highest standards of human rights. Our standards are grounded in the UN Guiding Principles on Business and Human Rights, the International Bill of Human Rights and the International Labor Organization Fundamental Principles and Rights at Work. As a signatory company of the United Nations Global Compact, we are committed to Human Rights across our supply chain.
- Trade Compliance:** Ingredion’s Trade Compliance Management System (TCMS) provides a comprehensive, coordinated and systematic approach to managing the Company’s trade activities in compliance with applicable laws and regulations.
- Environmental Health and Safety:** Ingredion is committed to safeguarding people, assets and the environment, and maintaining compliance with all applicable EHS&S regulations and requirements. We are dedicated to collaborating with stakeholders, producing quality products safely and sustainably and reducing environmental impact.

## Training and Communication

Throughout the year, we provide consistent and interactive training to our global teams to create a steady drumbeat of communication on the importance of ethical business practices.



rate of completion  
of all training delivered  
to employees.



Our annual Living Our Values training also includes an annual certification of compliance, conflicts of interest disclosure and now, for the third year in a row, an ethical culture pulse survey. Other communication examples include:

**01**

### Five Minutes With

**PURPOSE:**  
**Storytelling from executive leaders sharing reflections on how to lead with integrity and manage risk with resiliency and agility.**

**02**

### Risky Recipes

**PURPOSE:**  
**Quarterly communications of real-life stories of ethics and compliance situations.**

**03**

### Global Business Integrity Week

**PURPOSE:**  
**Our annual global celebration of our values and culture of ethics. Integrity Week’s goal is to inspire, engage and inform our global teams on risks that can affect our business.**



## Ethisphere World's Most Ethical Companies

Ingredion's leadership in sustainability, governance, ethics and compliance in 2024 led to it being honored for the eleventh time as one of the World's Most Ethical Companies<sup>®</sup> by Ethisphere Institute for 2025.

Ingredion's Business Integrity program was also featured in Ethisphere's "Ethicast" Webcast, showcasing the company's approach to monitoring and measuring the effectiveness of our internal investigations.



**KIMBERLY WHITE**  
Vice President and  
General Counsel,  
Compliance

*Ethisphere continues to create a benchmark against which we evaluate our ethics and governance programs, allowing us to identify opportunities to continually improve our processes.*

## Business Ethics Reporting

Our **Speak Up!** culture encourages employees and suppliers to raise concerns and report suspected misconduct.

### Concerns or Questions

can be raised to the employee's manager, human resources or the Business Integrity team at [AsktheCCO@ingredion.com](mailto:AsktheCCO@ingredion.com), or by contacting the confidential Business Ethics Line by phone or web at [INGRethics.com](http://INGRethics.com)



The Business Ethics Line is available 24/7, is available in 12 languages and offers the option for anonymous reporting. The Business Ethics Line is managed by an independent, third-party vendor and is freely available to employees and anyone who conducts business with Ingredion. Our reporting process logs, reviews and assigns reported matters to trained internal team members. For quality assurance, Ingredion annually reviews the effectiveness of its internal reporting process and solicits feedback from individuals who, if identified, have interacted with the process to ensure compliance with our investigative principles of procedural justice. Ingredion investigates all credible good-faith reports of misconduct. We have a zero-tolerance for retaliation against anyone who reports suspected violations of policy in good faith.

# People: Our Key Ingredient for Sustainability

A Letter from Our Chief Sustainability Officer

Thank you for taking the time to read our 2024 Sustainability Report. While I'm very proud of the progress we continue to make toward our sustainability goals, I'm even more proud of the level of engagement we continue to see in this critical space.

As you have read, we continue to leverage the diverse capabilities of our employees and our business partners to drive progress. Our employees continue to find ways to innovate on sustainable solutions and programs. We leverage stakeholder knowledge and insight by working closely with our customers and NGO partners to collaborate and create mutual value in reaching our sustainability aspirations.

Make no mistake, sustainability continues to be a challenging area where we see trade-offs, shifting business priorities, increasing regulations and evolving stakeholder demand. Now more than ever it is critical that we maintain open and honest dialogue with our business partners so we can identify a path forward. Across 2024 I had many meetings with our customers' senior leadership teams, and sustainability continues to be an area of focus and growth. I believe there continues to be an emphasis on valuing transparency and collaboration over perfection.

When I pause and look back for a moment, I am amazed and proud of how far we have come. For the first time in 2024, Ingredion was named to Barron's 100 Most Sustainable US Companies list. We are humbled to be included with companies that we admire and benchmark ourselves against in creating sustainable business. Accomplishments like this happen not because we have a small team of people working on sustainability, but because the very idea of being a more sustainable business has been embraced by our employees in regions and functions across the business. I continue to be humbled by how our people innovate to enhance sustainability in their day-to-day jobs.

As we continue to drive progress, I know we will continue to encounter challenges and business opportunities that require us to adapt our sustainability strategy. The path forward will be very clear in some areas, while less clear in others. We will remain focused on moving forward, learning from our mistakes, sharing best practices with our stakeholders and ultimately continuing to drive progress on our sustainability goals. We will continue to do this by leveraging the talent of our people and the individuals with whom we collaborate.



A handwritten signature in black ink, appearing to read "Larry Fernandes".

**LARRY FERNANDES**  
Senior VP, Chief Commercial  
and Sustainability Officer