



SQF Food Safety Audit Edition 9

General Produce Company, LTD Sacramento - 56945

Summary

Audit Decision

Certified

Certificate Number

56945

Audit Rating

Excellent

Decision Date

April 14, 2025

Audit Type

Recertification

Recertification Date

April 15, 2026

On-Site Audit Dates

March 27, 2025 - March 28, 2025

Expiration Date

June 29, 2026

ICT Dates

-

Issue Date

April 14, 2025

Facility and Scope

General Produce Company, LTD Sacramento - 56945

7625 Lone Tree Rd
Sacramento, 95837 United States

Products

fruits & vegetables, frozen warehouse, chilled warehouse

Food Sector Categories

04. Fresh Produce, Grain, and Nut Packhouse Operations
26. Storage and Distribution

Scope of Certification

04. Fresh Produce, Grain and Nuts Packhouse

Certification Body and Audit Team

Intertek SAI Global

45 Clarence Street
Suite 7.01, Level 7
Sydney, NSW 2000 Australia

CB#: 41736

Accreditation Body: JASANZ

Accreditation Number: Z1440295AS

Lead Auditor: Katie Das (C-363363)

Technical Reviewer: Anna Grabczak (C-374701)

Hours Spent on Site: 16

Hours of ICT Activities:

Hours Spent Writing Report: 5

Operations: fruits & vegetables 26. Storage and
Distribution: frozen warehouse, chilled warehouse

Section Responses

Audit Statement - Audit

SQF Practitioner Name - Name the designated SQF Practitioner

Response: John Rosas, FSQA Supervisor

SQF Practitioner Email - Email of the designated SQF Practitioner

Response: jrosas@generalproduce.com

Opening Meeting - People Present at the Opening Meeting (Please list names and roles in the following format Name: Role separated by commas)

Response: Brian Hamilton, Director of Operations, Jake Hanson Day Operations Manager, John Rosas FSQA supervisor, Katie Das, Lead auditor

Facility Description - Auditor Description of Facility (Please provide facility description include # of employees, size, production schedule, general layout, and any additional pertinent details)

Response: This facility is located in the rural area of Sacramento CA, in the general Sacramento International Airport area. The facility is a stand alone building, that was built 2022 and the building was continuously occupied by the company since then. This facility has 107,000sq ft, 800 sq ft of repack area where exposed food is located. There one freezer kept at (-10F) (2900 sq Ft), and chiller area with 5 temperature zones (45 F, 55 F, 38F, ambient). There are 26 doors (25 usable plus one compactor), used for shipping and receiving. The facility employs 220 people, working as follows: day shift and night shift with 24 hour coverage. No blackout dates in the facility. The facility is part of Pro-Act. Eggs, milk, meats, fruits and vegetables, RTE foods are pallet in case out. The facility has Ambient, frozen, and refrigerated products: eggs, milk, meats, fruits and vegetables, RTE foods are pallet in case out. The customer base includes food service, export (for retail).

Closing Meeting - People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by commas)

Response: Brian Hamilton, Director of Operations, Jake Hanson Day Operations Manager, John Rosas FSQA supervisor, Katie Das, Lead auditor

Auditor Recommendation - Auditor Recommendation

Response: Proceed with certification pending resolution of non-conformances

2.1.1 - Management Responsibility (Mandatory)

2.1.1.1 - Senior site management shall prepare and implement a policy statement that outlines at a minimum the commitment of all site management to: i. Supply safe food; ii. Establish and maintain a food safety culture within the site; iii. Establish and continually improve the site's food safety management system; and iv. Comply with customer and regulatory requirements to supply safe food. The policy statement shall be: v. Signed by the senior site manager and displayed in prominent positions; and vi. Effectively communicated to site personnel in language(s) understood by all site personnel.

Response: Compliant

2.1.1.2 - Senior site management shall lead and support a food safety culture within the site that ensures at a minimum: i. The establishment and documentation of clear and concise food safety objectives and performance

measures and their communication to all relevant staff; ii. Adequate resources are available to meet food safety objectives and performance measures; iii. Food safety practices and all applicable requirements of the SQF System are adopted and maintained; iv. Staff are informed and are aware of their food safety and regulatory responsibilities; v. Staff are informed and held accountable for their food safety and regulatory responsibilities; vi. Staff are positively encouraged and required to notify management of actual or potential food safety issues; and vii. Staff are empowered to act to resolve food safety issues within their scope of work.

Response: Compliant

2.1.1.3 - The reporting structure shall identify and describe the site personnel with specific responsibilities for tasks within the food safety management system and identify backup for absence of key personnel. Job descriptions for the key personnel shall be documented.

Response: Compliant

2.1.1.4 - Senior site management shall designate a primary and substitute SQF practitioner for each site with responsibility and authority to: i. Oversee the development, implementation, review, and maintenance of the SQF System, including Good Agricultural/Operating Practices outlined in 2.4.2, and the food safety plan outlined in 2.4.3. ii. Take appropriate action to ensure the integrity of the SQF System; and iii. Communicate to relevant personnel all information essential to ensure the effective implementation and maintenance of the SQF System

Response: Compliant

2.1.1.5 - The primary and substitute SQF practitioner shall: i. Be employed by the site; ii. Hold a position of responsibility in relation to the management of the site's SQF System; iii. Be competent to implement and maintain HACCP-based food safety plans; and iv. Have an understanding of the SQF Food Safety Code: Primary Plant Production and the requirements to implement and maintain an SQF System relevant to the site's scope of certification.

Response: Compliant

2.1.1.6 - Senior site management shall ensure the training needs of the site are resourced, implemented, and meet the requirements outlined in system elements 2.9 and that site personnel have met the required competencies to carry out those functions affecting the legality and safety of food products.

Response: Compliant

2.1.1.7 - Senior site management shall ensure the integrity and continued operation of the food safety system in the event of organizational or personnel changes within the company or associated facilities.

Response: Compliant

2.1.1.8 - Senior site management shall designate defined blackout periods that prevent unannounced re-certification audits from occurring out of season or when the site is not operating for legitimate business reasons. The list of blackout dates and their justification shall be submitted to the certification body a minimum of one (1) month before the sixty (60) day re-certification window for the agreed-upon unannounced audit.

Response: Compliant

Summary -

Response: Policy management commitment to Food safety and Quality is documented and implemented, it is signed by the CEO dated 03/06/2025 and posted in the breakroom and the main entrance area. The information is communicated to all associates at least on an annual basis. The scope of the site's SQF certification is all products and all buildings associated with this location. Food Safety plan (see section 2.4.3)

contains the specific food products and types managed at this location. Organizational chart for this location was presented during the audit and was verified to be correct, all positions holding food safety responsibilities are adequately staffed. The organizational chart is dated 01/15/2025 and includes FSQA Supervisor and the substitute are clearly defined. The SQFP and the back up are full time employees of this location and qualified individuals based on their experience and training. Food safety objectives are defined and include quarterly goals that are adjusted and include organic and vendor compliance. Employees are encouraged to bring up any food safety issues daily and also are encouraged to improve via implemented incentive program. GM is responsible for food safety and compliance with the requirements of the SQF Code. GMP is supported by designated people in charge, such as SQFP, Operations manager or a designated person in charge such as a shipping/receiving manager. The CEO supports food safety performance measures to ensure that the adequate resources are available to achieve this and any additional food safety objectives and individuals are held accountable for their food safety responsibilities. Training is conducted to ensure that employees are aware and reminded of the food safety responsibilities. Additionally, the site has established food safety culture objectives which are re-evaluated and revised yearly or as needed. Site's SQF practitioner holds monthly meetings the site senior management monthly for any pertinent ongoing updates of the food safety and the SQF system. Job descriptions for all positions in the organizations are drafted and include the respective position's responsibilities with respect to food safety. The auditor has reviewed a job description for shipping/receiving lead and SQFP which included these positions responsibilities for food safety. The integrity and continued operation of the SQF system and the food safety system is responsibility of the GM. No blackout periods in the facility. Records sighted: HACCP training for SQFP substitute dated 09/4/2023 , and SQFP issued by the international HACCP alliance and dated 03/02/2023.

2.1.2 - Management Review (Mandatory)

2.1.2.1 - The SQF system shall be reviewed by senior site management at least annually and include: i. Changes to food safety management system documentation (policies, procedures, specifications, food safety plan); ii. Food safety culture performance; iii. Food safety objectives and performance measures; iv. Corrective and preventative actions and trends in findings from internal and external audits, customer complaints, and verification and validation activities; v. The hazard and risk management system; and vi. Follow-up action items from previous management review. Records of all management reviews and updates shall be maintained.

Response: Compliant

2.1.2.2 - The SQF Practitioner(s) shall update senior site management on at least a monthly basis on matters impacting the implementation and maintenance of the SQF System. The updates and management responses shall be documented.

Response: Compliant

Summary -

Response: Policy Management review is documented and implemented, all SQF documents, policies and procedures are reviewed annually or as changes occur. No changes in the past year. The elements covered in the review include internal audits, customer complaints, HACCP and food safety plan, results of external and regulatory audits. and food safety objective and performance measures, as well as follow up items from the previous management review. All pre-requisite programs and SQF elements were reviewed as part of the annual management review. The site's SQFP updates management on a consistent basis, at least on a monthly basis. Records sighted: SQF system review 01/17/2025 (yearly management review), and records of the monthly (or weekly if applicable) management update meetings dated 05/17/2024, 05/31/2024, 07/12/2024,

07/05/2024, 08/09/2024, 08/30/2024, 10/11/2024, Items discussed included food safety and quality issues such as QC inspections, personnel training, customer complaints, product sorting, temperature monitoring and pre-cooling of trucks.

2.1.3 - Complaint Management (Mandatory)

2.1.3.1 - The methods and responsibility for handling, investigating, and resolving complaints from commercial customers, consumers, and authorities arising from products grown or handled on-site, shall be documented and implemented.

Response: Compliant

2.1.3.2 - Adverse trends of customer complaint data shall be investigated and analyzed, and root cause established by personnel knowledgeable about the incidents.

Response: Compliant

2.1.3.3 - Corrective and preventative action shall be implemented based on the seriousness of the incident and the root cause analysis as outlined in 2.5.3. Records of customer complaints, their investigation and resolution shall be maintained.

Response: Compliant

Summary -

Response: The customer complaint policy is dated 01/15/2025. The facility receives complaints by phone or email. Responsibilities are assigned to receptionist, customer service/inside sales team, customer service manager, director of customer service, FSQA supervisor. The facility trends complaints and the operation manager is responsible for the complaint investigation. Complaints include shorts, wrong item, mis pick, reject on delivery. Customer complaints are logged and analyzed on a weekly and quarterly basis, and analyzed. Customer complaint categories included customer error, short on load, wrong item shipped, sales error, quality related complaints and Out/not available. Records sighted: 2024 Q1- Q4 complaints were reviewed. Most complaints were related to the product outages and customer error. No food safety related complaints received in the past year. Corrective action form dated 11/04/2024 (foreign object found in a case of produce) was reviewed along with the incident report. The incident was resolved as per the implemented Non-conforming product or equipment policy.

2.2.1 - Food Safety Management System (Mandatory)

2.2.1.1 - The methods the site uses to meet the requirements of the SQF Food Safety Code: Primary Plant Production shall be maintained in electronic and/or hard copy documentation. They will be made available to relevant staff and include: i. Food safety policies and organization chart; ii. Products covered under the scope of certification; iii. Food safety regulations that apply to the site and to the country of sale if known; iv. Agricultural inputs/materials, packaging materials, and finished product specifications; and v. Written procedures and programs (Good Agricultural Practices and/or Good Operational Practices) and other documentation necessary to support the development, implementation, maintenance, and control of the SQF System (e.g., food safety plans, validation, and verification).

Response: Compliant

2.2.1.2 - Food safety plans, Good Agricultural/Operating Practices, and all relevant aspects of the SQF System shall be reviewed, updated, and communicated as needed when any potential changes implemented have an impact on

the site's ability to deliver safe food. The reason for the change shall be documented.

Response: Compliant

Summary -

Response: Document food safety management system is documented and implemented, SQF code is used to determine document numbers and keep the policy in order for easy access in finding documents. FSMS is developed to provide a system of policies, procedures and recordkeeping in order to meet objectives. All programs are reviewed at least annually. Organizational chart is on file and current, products covered under the scope of certification are documented, food safety regulations that are applicable to this facility are defined in the regulatory compliance policy. The controlled documents include the organizational chart, the policy statement, the scope of certification and products covered under the scope of certification.

2.2.2 - Document Control (Mandatory)

2.2.2.1 - The methods and responsibility for maintaining document control, including records, shall be documented and implemented. They shall ensure that documents and records are i. Controlled; ii. Current; iii. Safely stored to prevent unauthorized access, loss, damage, and deterioration; iv. Organized in a registry or listing form; and v. Readily accessible in a manner that ensures employees use up-to-date and current policies, procedures (work instructions/task lists), and forms when documenting food safety related activities.

Response: Compliant

Summary -

Response: Document control program is documented and implemented. SQFP or a designate oversee the program. Food safety system documents are controlled, current and safely stored on line and in paper. SQF system register is documented and was reviewed during the audit. Forms and records are available to employees and are non-changeable.

2.2.3 - Records (Mandatory)

2.2.3.1 - All manual or electronic/digital records shall be legible, suitably authorized, and/or signed by those undertaking activities to demonstrate that inspections, supervisory reviews, testing, and other essential activities have been completed.

Response: Compliant

2.2.3.2 - Records shall be retained in accordance with periods specified by a customer or regulations or at a minimum no less than product shelf life.

Response: Compliant

Summary -

Response: Document control and revisions is documented, SQFP oversees the program. Procedures on creating, maintaining and amending and verifying records are on file. Records reviewed during the audit were legible and signed by those undertaking the activities and verified as per the verification procedures. Records are stored electronically. Document control and Revisions log is kept and updated as needed. Location of the records is outlined in the policy and they are stored in QC office . Records are required to be stored in a secure area to prevent adulteration, or deterioration.

2.3.1 - Plant Variety/Hybrid or Product Development

2.3.1.1 - The methods and responsibility for designing, developing, and converting product concepts (e.g. new varieties, hybridization, crops, species) to commercial realization shall be documented and implemented and comply with regulatory and customer requirements. Records for new products testing, shelf life, and final approvals shall be maintained.

Response: N/A

Evidence: • The facility does not design, develop, or converting product concepts- NA (2.3.1.1-2.3.1.4)

2.3.1.2 - The food safety plan shall be reviewed and revised accordingly for each new product and its associated process through conversion to commercial production and distribution, or where a change to inputs, process, or packaging occurs that may impact food safety.

Response: N/A

Evidence: • The facility does not design, develop, or converting product concepts- NA (2.3.1.1-2.3.1.4)

2.3.1.3 - New products shall be tested and inspected to ensure they meet stated shelf life, maximum residue limits (MRLs), and other regulatory and customer requirements (e.g., potency, strength, purity).

Response: N/A

Evidence: • The facility does not design, develop, or converting product concepts- NA (2.3.1.1-2.3.1.4)

2.3.1.4 - The process flows for all new and existing processes shall be designed to ensure that products meet specifications and to prevent cross-contamination.

Response: N/A

Evidence: • The facility does not design, develop, or converting product concepts- NA (2.3.1.1-2.3.1.4)

Summary -

Response: The facility does not design, develop, or converting product concepts- NA (2.3.1.1-2.3.1.4)

2.3.2 - Specifications (Agricultural Inputs, Packaging, Harvested Product, and Contract Services)

2.3.2.1 - Specifications and/or descriptions for seeds, agricultural inputs, packaging, and contract services that impact finished product safety shall be documented, approved, comply with relevant legislation, and kept current through a review process.

Response: Compliant

2.3.2.2 - Food contact packaging, seeds, and agricultural inputs shall be verified to ensure product safety is not compromised and the material is fit for its intended purpose. Verification shall include certificates of conformance, certificate of analysis, or sampling and testing (refer to 2.4.4.1).

Response: Compliant

2.3.2.3 - Finished product specifications shall be documented, approved by the site and its customer where applicable, accessible to relevant staff, and kept current through a review process. Specifications shall include, where applicable: i. Microbiological, purity, strength, composition, and agricultural chemical limits; ii. Maximum residue limits (MRLs) for pesticides; and iii. Labeling and packaging regulatory and customer requirements.

Response: Compliant

2.3.2.4 - The methods and responsibilities for managing contract farms, services (e.g., spraying), packers, or

storage and distribution facilities shall be documented and implemented to ensure the following are being met: i. Contract farms and services shall comply with the SQF Food Safety Code: Primary Plant Production and relevant regulatory and customer requirements; ii. Changes to contractual agreements are approved by both parties and communicated to relevant personnel; and iii. Records of all contract reviews and changes to contractual agreements and their approvals are maintained.

Response: Compliant

2.3.2.5 - A register or listing of all specifications and/or descriptions for seeds, agricultural inputs, packaging, and labels, finished products, and contract services shall be maintained and kept current.

Response: Compliant

Summary -

Response: Policy Approved supplier/input purchasing program is documented and implemented. Contract service register is documented and current, dated The register list the service, training company and service provided. Training records for the chemical company , laboratory and scale calibration service. The specification policy is dated 01/07/2025. Specifications for raw materials, packaging, ingredients, additives, chemicals and processing aids have been documented. Current registers were reviewed for raw materials, packaging materials and labels. The policy lists the methods and responsibility for approving ingredients, records are on file. Raw and packaging materials are verified to ensure product safety and meet regulatory requirements . These are done by means of COAs on all ingredients, certificates of compliance on packaging, letters of guarantee and third party audits. Product labels are approved by QA, USDA labels are submit to the USDA inspector. There is a register of raw material, ingredients and packaging specifications, under approved vendors, found to be current. Records sighted: approved contractor list register, contract service providers for dock and door maintenance, heating and cooling contractor, records of supplier approval for the supplier of raspberries, GSFI certification dated 11/25/2025 (all supplier data is kept in Produce Pro). GSFI certification for cilantro stocked at the warehouse, certificate expiration date 04/07/2025.

2.3.3 - Approved Supplier/Input Purchasing Program (Mandatory)

2.3.3.1 - Seeds, agricultural inputs, harvested product, market-ready product, and packaging materials that impact finished product food safety shall be supplied by an approved supplier. The methods and responsibility for selecting, evaluating, approving, and monitoring an approved supplier shall be documented and implemented. The approved supplier program shall contain at a minimum: i. A risk level assigned to each supplier that is based on the past performance of the supplier, criticality to the site, food safety risk, and other relevant factors determined by the site; ii. Agreed specifications; iii. A summary of the food safety controls implemented by the approved supplier, including regulatory compliance and licensing where applicable; iv. Methods for granting approved supplier status; v. Methods and frequency of monitoring approved suppliers, which may include testing, receiving inspection, and/or supplier audits; vi. Methods and frequency of reviewing approved supplier performance and status. Where supplier audits are used as a monitoring tool, they shall be based on risk and conducted by individuals knowledgeable of applicable regulatory and food safety requirements and trained in auditing techniques. A register or list of approved suppliers and records of monitoring activities shall be maintained. Code Amendment #2 Approved supplier registers shall include supplier contact details. All approved and emergency suppliers shall be registered.

Response: Compliant

2.3.3.2 - The receipt of seeds, agricultural inputs, harvested product, market-ready product, and packaging

materials from non-approved suppliers shall be acceptable in an emergency situation, provided they are inspected or analyzed before use.

Response: Compliant

2.3.3.3 - Agricultural inputs, harvested product, market-ready product, and packaging materials received from other sites under the same corporate ownership shall be subject to the same specification requirements (refer to 2.3.2), approved supplier requirements, and receiving inspections as all other material providers.

Response: Compliant

Summary -

Response: Approved supplier policy is dated 01/07/2025. The facility requires a supplier approval packet, documents required- 3rd party audit, COI Organic certification, contact information, recall contact. The SQFP is responsible for approving suppliers and the facility conducts an annual evaluation. The facility does not have other company owned sites. Records sighted: approved contractor list register, contract service providers for dock and door maintenance, heating and cooling contractor, records of supplier approval for the supplier of raspberries,). GFSI certification for cilantro stocked at the warehouse, certificate expiration date 04/07/2025.

2.4.1 - Food Legislation (Mandatory)

2.4.1.1 - The owner/senior site manager shall ensure that, at the time of delivery to its customer, the food supplied shall comply with food safety and production legislation applicable in the country of use and sale, if known. Any specific licensing requirements or commodity-specific regulations shall be maintained and kept current.

Response: Compliant

2.4.1.2 - The methods and responsibility for ensuring the organization is kept informed of changes to relevant legislation, scientific and technical developments, emerging food safety issues, and relevant industry codes of practice shall be documented and implemented.

Response: Compliant

2.4.1.3 - SQFI and the certification body shall be notified in writing within twenty-four (24) hours as a result of a regulatory warning or event. Notification to SQFI shall be by email to foodsafetycrisis@sqfi.com.

Response: Compliant

Summary -

Response: Food Legislation policy is documented and implemented. Pre-requisite programs are established, product specifications for each product manufactured at this facility is defined. Food legislation policy is established. SQFP is responsible for tracking applicable regulation. Methods to ensure that the management and the organization are updated on applicable regulations are outlined and include membership in the industry organizations, subscriptions to the FDA and USDA publications and Notification of certification bodies, organic certifier are required. In case of regulatory warning or event, SQFI and the certification body will be notified in 24 hours in writing.

2.4.2 - Good Agricultural/Operating Practices (Mandatory)

2.4.2.1 - The site shall ensure the applicable Good Agricultural Practices described in modules 7, 8, or 18 and the Good Operating Practices described in module 10 of this Food Safety Code are documented and implemented (refer to 2.2.1.1), or exempted according to a written risk analysis outlining the justification for exemption or

evidence of the effectiveness of alternative control measures to ensure that food safety is not compromised.

Response: Compliant

Summary -

Response: The facility operates in compliance with Good Agricultural practices. Employees in the repack area are required to wear hairnets, gloves, and disposable aprons . Employees in the distribution facility are required to wear clean clothes .All employees , visitors and contractors re required to wash hand before entering the facility. The employees wear clothes in good condition and changed aprons if they are ripped or after leaving the repack area. Visitors are required in at the to sign in and follow the established GMP procedures.

2.4.3 - Food Safety Plan (Mandatory)

2.4.3.1 - A HACCP-based referenced food safety plan, developed by a responsible authority, shall be implemented in the absence of a specifically developed food safety plan for the site. The site shall: i. Maintain current records indicating that the food safety plan has been reviewed and its scope of hazard analysis, risk assessments, and control measures, such as Good Agricultural or Operational Practices, cover all products produced and sold by the site and are within the scope of certification; and ii. Document when changes in the food safety plan have impacted their Good Agricultural or Operational Practices. Note: Sites shall choose either 2.4.3.1 or 2.4.3.2 with the subsequent 2.4.3 requirements as the mandatory element.

Response: Compliant

2.4.3.2 - Where a site has developed its own food safety plan, either by choice or due to product(s) not included within the scope of a HACCP-based model as per 2.4.3.1, it shall be implemented and maintained and outline how the organization controls and assures food safety of the products or product groups and their associated processes that are included in the scope of the SQF certification. More than one HACCP food safety plan may be required to cover all products included in the scope of certification.

Response: Compliant

2.4.3.3 - The food safety plan(s) shall be developed and maintained by a team that includes the SQF practitioner and those site personnel with agricultural, technical, and/or machinery knowledge relevant to the commodities and products. Where the relevant expertise is not available on-site, advice may be obtained from other sources to assist the food safety team.

Response: Compliant

2.4.3.4 - The scope of each food safety plan shall be developed and documented including the start and endpoints of the processes under consideration and all relevant inputs and outputs.

Response: Compliant

2.4.3.5 - Product descriptions shall be developed and documented for all products included in the scope of the food safety plans. These shall reference and/or include: i. The finished product specifications; ii. Information relevant to product safety, such as it is ready-to-eat, requires further processing, and/or storage conditions; and iii. The intended use of each product, which includes target consumer groups, the potential for consumption by vulnerable groups of the population, requirements for further processing if applicable, and potential alternative use of the product.

Response: Compliant

2.4.3.6 - The food safety team shall develop and document a flow diagram covering the scope of each food safety plan. The flow diagram shall include every step in the process of primary production, all agricultural inputs, packaging material, service inputs (e.g., water, steam, gasses as appropriate), process delays, and all process outputs, including feed, waste, and rework. Each flow diagram shall be confirmed by the food safety team to cover all stages and hours of operation.

Response: Compliant

2.4.3.7 - The food safety team shall identify and document all food safety hazards that can reasonably be expected to occur at each step in the processes, including agricultural inputs.

Response: Compliant

2.4.3.8 - The food safety team shall conduct a hazard analysis for every identified hazard to determine which hazards are significant, i.e., their elimination or reduction to an acceptable level is necessary to control food safety. The methodology for determining hazard significance shall be documented and used consistently to assess all potential hazards.

Response: Compliant

2.4.3.9 - The food safety team shall determine and document the control measures that must be applied to all significant hazards. More than one control measure may be required to control an identified hazard, and more than one significant hazard may be controlled by a specific control measure.

Response: Compliant

2.4.3.10 - Based on the results of the hazard analysis (refer to 2.4.3.8), the food safety team shall identify the steps in the process where control must be applied to eliminate a significant hazard or reduce it to an acceptable level (a critical control point or CCP). In instances where a significant hazard has been identified at a step in the process, but no control measure exists, the food safety team shall modify the process to include an appropriate control measure.

Response: Compliant

2.4.3.11 - For each identified CCP, the food safety team shall identify and document the critical limits that separate safe from unsafe product. The food safety team shall validate all of the critical limits to ensure the level of control of the identified food safety hazard(s) and that all critical limits and control measures, individually or in combination, effectively provide the level of control required (refer to 2.5.2.1).

Response: Compliant

2.4.3.12 - The food safety team shall develop and document procedures to monitor CCPs to ensure they remain within the established limits (refer to 2.4.3.11). Monitoring procedures shall identify the personnel assigned to conduct testing, the sampling and test methods, and the test frequency.

Response: Compliant

2.4.3.13 - The food safety team shall develop and document deviation procedures that identify the disposition of affected product when monitoring indicates a loss of control at a CCP. The procedures shall also prescribe actions to correct the process step to prevent recurrence of the safety failure.

Response: Compliant

2.4.3.14 - The documented and approved food safety plan(s) shall be implemented in full. The effective implementation shall be monitored by the food safety team, and a full review of the documented and implemented

plans shall be conducted at least annually, or when changes to the process, equipment, inputs, or other changes affecting product safety occur.

Response: Compliant

2.4.3.15 - Procedures shall be in place to verify that critical control points are effectively monitored and appropriate corrective actions are applied. Implemented food safety plans shall be verified as part of SQF System verification (refer to 2.5).

Response: Compliant

2.4.3.16 - Critical control point monitoring, corrective action, and verification records shall be maintained and appropriately used.

Response: Compliant

2.4.3.17 - Where food safety regulations in the country of production and destination (if known) prescribe a food safety control methodology other than the Codex Alimentarius Commission HACCP guidelines, the food safety team shall implement food safety plans that meet both Codex and food regulatory requirements.

Response: Compliant

Summary -

Response: HACCP plan approved date 04/11/2022 rev date 02/10/2025 is documented and implemented. It is compliant with requirements of Codex Alimentarius and 12 principles of HACCP. HACCP cross-functional team is established and documented. The HACCP plan and the food safety plan including all pre-requisite programs is reviewed once/year or as changes occur. No changes since the last audit, the latest review occurred on 02/10/2025. Product description, flow diagram (signed by the HACCP team and verified in all hours of production is on file, dated 02/19/2025). Hazard analysis listing all possible hazards expected to occur including microbiological, chemical, physical are listed in the hazard analysis. Preventive controls identified in this facility include Supplier approval, temperature control during receiving shipping, storage. There 5 temperature zones for storage in this facility: There is a freezer kept at (-10F for frozen soup, frozen bread, ice cream frozen processed food)and 4 temperature zones for the chiller. Produce (onions, bananas) - 55F, select vegetables like bell peppers, tomatoes kept at 45F, lettuce, leafy greens, milk, cheese, eggs- 38F. There are no CCPs identified in this facility, CP's are identified in the hazard analysis. No deviations have occurred in the past year with any of the PCs or CPs. Procedures to monitor CP's and PC's are implemented to ensure that the food safety system is functioning as intended. Records sighted: continuous temperature monitoring records for Freezer, chiller, 09/30/2024, 09/29/2024, 09/28/2024, 09/28/2024.

2.4.4 - Product Sampling, Inspection and Analysis

2.4.4.1 - The sampling, inspecting, and/or analyzing of agricultural inputs and finished product shall be documented and implemented. The procedures applied shall ensure: i. Inspections and analyses are completed at regular intervals as required and to agreed specifications (e.g., MRLs, purity, strength, composition as per 2.3.2) and regulatory and labeling requirements; ii. Records of all inspections and analyses are maintained; and iii. All analyses are conducted to nationally recognized methods or alternative methods which are validated as equivalent to the nationally recognized methods. Where external laboratories are used to conduct input or product analyses, the laboratories shall be accredited to ISO 17025 or an equivalent national standard, licensed or recognized by a regulatory authority if required, and shall be included on the site's contract service specifications register (refer to 2.3.2.1). Where internal laboratories are used to conduct input or product analyses, sampling and testing methods shall be used in accordance with the applicable requirements of ISO/IEC 17025 or an equivalent national standard,

including annual proficiency testing for personnel conducting analyses.

Response: Compliant

2.4.4.2 - On-site laboratories conducting chemical and microbiological analyses that may pose a risk to product safety shall ensure the following: i. Be located separate from any food handling or packaging activity and designed to limit access only to authorized personnel; ii. Provisions shall be made to isolate and contain all laboratory waste and to manage laboratory waste separately from food waste; iii. Laboratory wastewater outlets shall at a minimum be downstream of drains that service food processing and handling areas; and iv. Signage is displayed that identifies the laboratory area as a restricted area, accessible only by authorized personnel.

Response: N/A

Evidence: • No on-site laboratory- NA (2.4.4.2)

Summary -

Response: Product sampling, inspection and analysis policy is documented and implemented. QC oversees the policy. Personnel performing quality control analysis is trained on the procedure. QC analysis frequency is documented and the criteria of evaluation is documented in the policy and is product specific, it includes example and photo references as well as descriptions of any conforming or non-conforming attributes. The auditor observed QC analysis performed on button mushrooms and raspberries during the audit. Non-conforming product that is identified as part of the QC evaluations is disposed of or collected for donation as appropriate based on the assigned grade. Laboratory analysis is not used as part of the QC evaluation. No on-site laboratory- NA (2.4.4.2). Records sighted: Quality Control summary for non-conforming product dated 03/06/2025 which was sent to the buyer and the QC department re: product reconditioning.

2.4.5 - Non-conforming Agricultural Inputs and Products

2.4.5.1 - The methods and responsibility for how to control non-conforming products, agricultural inputs, and packaging shall be documented and implemented. The procedures shall ensure: i. Items are quarantined (held), identified, handled, re-worked, and/or disposed of in a manner that minimizes the risk of inadvertent use, improper use, or risk to the integrity of finished product; ii. All relevant personnel are aware of the site's hold and release instructions and approvals; and iii. Records of non-conforming product holds, release, and dispositions are maintained.

Response: Compliant

Summary -

Response: Policy Non-conforming AG inputs and Products is documented and implemented. Non-conforming items such as damaged produce is sorted and either collected for donation or thrown away. Items that are deemed to be salvageable are sorted (no open food or food processing). SQFP or a designate oversees the program and makes the final re-pack or donate decision. Any quarantined products (or product that was put on hold as part of the recall) would be sectioned off with chain link, marked with placard and placed on Freeze in the ERP system. Records sighted: records of non-conforming item (Lot number 96441811 dated 03/28/2025) which was observed in the facility during the facility tour in a distress location. Items designated for repack 96446201 03/22/2025 which were designated for re-pack.

2.4.6 - Product Rework

2.4.6.1 - The responsibility and methods outlining how harvested or packaged product or packaging are reworked

shall be documented and implemented. The methods applied shall ensure: i. Reworking operations are supervised by qualified personnel; ii. Reworked product is clearly identified and traceable; iii. Each batch/lot of reworked product is inspected or analyzed as required before release; iv. Inspections and analyses conform to the requirements outlined in element 2.4.4.1; and v. Records of all reworking operations are maintained.

Response: Compliant

Summary -

Response: Product is reworked if it is deemed to be suitable for reworking and SQFP is making the final decision on rework. Rework SOP and policy are documented and implemented. Product designated for rework is graded at a pre-determined QC grade and marked as rework. Repack leads are responsible for making sure the output of product meets the standards set by the product description (USDA #1, #2 etc). Quality control specialist will provide details of defects identified on the product in the inspection to a specific lot before the reconditioning occurs, so they are aware of the issues to work through. Quality control specialists will be of assistance if there are any questions. All repacks done are assigned a sub-lot from the parent and they are fully traceable through the ERP system. Records sighted: Quality control summary for chili jalapen dated 12/28/2024, (I4 grade inspection).

2.4.7 - Product Release (Mandatory)

2.4.7.1 - The methods and responsibility for releasing finished products shall be documented and implemented. The methods applied shall ensure: i. The product is released by authorized personnel; ii. The product is released only after all inspections and analyses have been successfully completed, reviewed, and documented; and iii. The product meets regulatory and other established food safety controls. Records of all product releases shall be maintained.

Response: Compliant

Summary -

Response: Product release is done by Quality control department and is based on room schedules,, and all products that are checked daily in the location. Records of all items are kept electronically stored in the companies ERP system, ProducePro . Records sighted: Corrective action form (functioning as product release notification) for the eggs placed on hold as part of the CDFA random inspection, dated 09/20/2024. The decision was taken by procurement and quality control.

2.4.8 - Environmental Monitoring

2.4.8.1 - A risk-based environmental monitoring program shall be in place for all products grown indoors and packhouse operations and include all processes and immediate surrounding areas. The methods and responsibility for the environmental monitoring program shall be documented and implemented.

Response: Compliant

2.4.8.2 - An environmental sampling and testing schedule shall be prepared. It shall at a minimum: i. Detail the applicable pathogens or indicator organisms to test for in that industry; ii. List the number of samples to be taken and the frequency of sampling; iii. Outline the locations in which samples are to be taken and the rotation of locations as needed; and iv. Describe the methods to handle elevated or undesirable results.

Response: Compliant

2.4.8.3 - Environmental testing results shall be monitored, tracked, and trended, and preventative actions (refer to

2.5.3.1) implemented where unsatisfactory trends are observed.

Response: Compliant

Summary -

Response: Environmental monitoring program is documented and implemented, rev date 1/23/2025. The site has implemented a risk-based environmental monitoring program. The sampling and testing program includes zone 2 through 4 and banana ripening rooms, 7 swabs for Listeria Spp, , Coliform, E coli. Quarterly and Zone 1 ATP swabbing daily Records reviewed show that corrective actions were taken when unsatisfactory trends were found, including vector swabbing. Swabbing locations include top of re-pack table, Records are discussed during food safety meetings. No adverse trends were noted. Records sighted: records of EMP program testing October 2024, verified by the PIC trends 2024. COA from approved laboratory for the drain swab dated 11/23/2024, water testing (annual) dated 02/21/2025 (water tested for E.coli and Total Coliform), ISO17025 for the Approved 3rd party Laboratory.

2.5.1 - Validation and Effectiveness (Mandatory)

2.5.1.1 - The methods, responsibility, and criteria for ensuring the effectiveness of all applicable elements of the SQF Program shall be documented and implemented. The methods applied shall ensure that: i. Good Agricultural/Operating Practices are confirmed to ensure they achieve the required results; ii. Critical food safety limits are reviewed annually and re-validated or justified by regulatory standards when changes occur; and iii. Changes to the processes or procedures are assessed to ensure the controls are still effective. Records of all validation activities shall be maintained.

Response: Compliant

Summary -

Response: The validation policy is dated 01/15/2025. The facility does not have any CCP, the facility validates the HACCP plan and ATP results annually.

2.5.2 - Verification Activities (Mandatory)

2.5.2.1 - The methods, responsibility, and criteria for verifying monitoring of Good Agricultural/ Operating Practices, critical control points, other food safety controls, and the legality of certified products shall be documented and implemented. The methods applied shall ensure that personnel with responsibility for verifying monitoring activities authorize each verified record.

Response: Compliant

2.5.2.2 - A verification schedule outlining the verification activities, their frequency of completion, and the person responsible for each activity shall be prepared and implemented. Records of the verification of monitoring activities shall be maintained.

Response: Compliant

Summary -

Response: Verification activities policy is documented and implemented, schedule of verification activities is documented and current. SQFP or a PIC are responsible for record verification. Current and updated verification schedule was reviewed during the audit and included internal audits and inspections, GMP's and personal hygiene, sanitation program, Backflow prevention, portable water testing, scale calibrations, ATP

luminometer, Infrared Temperature Gun verification and temperature probes verification. Responsibilities for most activities are with the FSQA supervisor and Director of Operations.

2.5.3 - Corrective and Preventative Action (Mandatory)

2.5.3.1 - The methods and responsibility for outlining how corrective and preventative actions are determined, implemented, and verified shall be documented and implemented. The procedures shall include: i. The identification of the root cause, and ii. Resolution of non-compliances of critical food safety limits and deviations from food safety requirements that are deemed significant. Records of all investigation and resolution of non-conformities, including their corrections and preventative actions, shall be maintained.

Response: Compliant

Summary -

Response: Corrective and preventative actions policy is documented and implemented. QA is responsible for maintenance of the program. Documented corrective action that included root cause analysis using 5 whys methodology, have been reviewed during the audit. Non-conformances are resolved to prevent recurrence. No food safety or HACCP deviations have occurred in the past year. CAPA log was reviewed during the audit that included product and raw material non-conformities and resolutions, area resolutions (related to building remodeling) and equipment non-conformities. All non-conformities were resolved and resolutions logged. Records sighted: Corrective action form dated 11/04/2024 (foreign object found in a case of produce) was reviewed along with the incident report. The incident was resolved as per the implemented Non-conforming product or equipment policy.

2.5.4 - Internal Audits and Inspections (Mandatory)

2.5.4.1 - The methods and responsibility for scheduling and conducting internal audits to verify the effectiveness of the SQF System shall be documented and implemented. Internal audits shall be conducted in full and at least annually. The methods applied shall ensure: i. All applicable requirements of the SQF Food Safety Code: Primary Plant Production are audited per the SQF audit checklist or a similar tool, and objective evidence is recorded to verify compliance and/or non-compliance; ii. Corrective and preventative actions of deficiencies identified during the internal audits are undertaken (refer to 2.5.3); iii. Audit results are communicated to relevant management personnel and personnel responsible for implementing and verifying corrective and preventive actions; and iv. Changes implemented from the internal audit that have an impact on the site's ability to deliver safe food result in a review of applicable aspects of the SQF System (refer to 2.3.1.3). Records of internal audits and any corrections and corrective action taken as a result of internal audits are maintained.

Response: Compliant

2.5.4.2 - Personnel conducting internal audits shall be trained and competent in internal audit procedures. Where practical, personnel conducting internal audits shall be independent of the function being audited.

Response: Compliant

2.5.4.3 - Regular inspections during growing and harvesting of products, packing of products, plant production, and/or equipment used shall be planned and carried out to verify Good Agricultural/Operating Practices and building/equipment maintenance are compliant to the applicable SQF Food Safety Code. The site shall: i. Take corrections or corrective and preventative actions; and ii. Maintain records of inspections and any corrective actions taken.

Response: Compliant

Summary -

Response: Internal audits and inspection program is documented and implemented. Management reviewed implemented food safety, SQF and HACCP program once/year, the latest review dated January 28-29, 2025. Non-conformities are identified, communicated to the relevant personnel and resolved as needed. and resolved to prevent re-occurrence. SQF checklist is used for the internal audit and was reviewed. Additionally internal GDP inspections are performed weekly - GMP inspection was reviewed during the audit and was performed SQFP and a Substitute are trained as internal auditors- certificate of training were reviewed during the audit, dated 05/22/2022 (SQFP substitute), 03/22/2024 (SQFP). Findings as part of the internal GMP inspections are used for coaching and training and other adjustments to prevent re-occurrence. Records sighted: SQF Annual assessment dated 01/28-29, 2025, Monthly GMP audit dated 04/16/2024, 07/15/2024, 09/24/2024, 10/31/2024, 12/17/2024, 02/24/2025.

2.6.1 - Product Identification (Mandatory)

2.6.1.1 - The methods and responsibilities for the product identification system shall be documented and implemented to ensure: i. Agricultural inputs, work-in-progress, and finished product are clearly identified during all stages of receipt, operations, storage, shipping, and transportation; ii. Finished product is labeled to the customer specification and/or regulatory requirements; and iii. Product identification records are maintained.

Response: Compliant

2.6.1.2 - The responsibility and methods used to trace product shall be documented and implemented to ensure: i. Finished product is traceable to the customer (one up) and provides traceability through the process to the agricultural input supplier and date of receipt of inputs, food contact packaging and materials, and other inputs (one back); ii. Traceability is maintained where product is reworked (refer to 2.4.3); and iii. The effectiveness of the product trace system is reviewed at least annually as part of the product recall and withdrawal review (refer to 2.6.2.1). Records for the receipt and use of agricultural inputs and packaging material and for finished product dispatch and destination are maintained.

Response: Compliant

Summary -

Response: Product identification program is documented and implemented, rev date 01/27/2025. QA oversees the program. Raw materials, packaging, work in progress and finished product are identified by unique and traceable lot codes. Finished product is accompanied by the specification sheets with product characteristics, ingredients, nutritional labels and lot coding explanation. An example of finished product specification (PRODUCT 1, 2, 3) were reviewed during the audit to verify compliance. Consistent practices were observed during the facility tour. Reconditioned product is labeled with traceability information. Mock recall is done 2x/year and records maintained. Records sighted: general produce lot code identification for PO #109422024 (milk products) dated 03/22/2024. , example of a product #14311 - product label. Records of mock recall 03/04/2024, scenario is vendor initiated recall. 100% mass balance was achieved 1.50 minutes, 50 cases were traced. Lot number 96240702.

2.6.2 - Product Withdrawal and Recall (Mandatory)

2.6.2.1 - The methods and responsibility to withdraw or recall product shall be documented and implemented. The procedure shall: i. Identify those responsible for initiating, managing, and investigating a product withdrawal or

recall; ii. Describe the procedures to be implemented by site management; iii. Outline a communication plan to inform customers, consumers, authorities, and other essential bodies in a timely manner appropriate to the nature of the incident; iv. Describe how the withdrawal and recall system is reviewed, tested, and verified least annually (mock recall); and v. Ensure that SQFI, the certification body, and the appropriate regulatory authority are listed as essential organizations and are notified in instances of a food safety incident of a public nature or product recall. Records of all product withdrawals, recalls, and mock recalls shall be maintained.

Response: Compliant

2.6.2.2 - Investigation shall be undertaken to determine the cause of a withdrawal or recall, and details of investigations and any actions taken shall be documented and recorded.

Response: Compliant

2.6.2.3 - SQFI and the certification body shall be notified in writing within twenty-four (24) hours upon identification of a food safety event that requires public notification. SQFI shall be notified at foodsafetycrisis@sqfi.com.

Response: Compliant

Summary -

Response: Withdrawal and recall procedure rev date 01/20/2025 s documented and implemented. The purpose of this policy is to describe the process used to withdraw or recall product from the marketplace. These requirements are the responsibility of the Senior Management and QA, Definitions for 3 classes of recall are on file, recall team is established at the site and the corporate level. Sources of legal advice are listed. Definitions for the 3 classes of recall are documented. SQFI and CB are to be notified in case of the recall within 24 hours of the reportable food safety event. SQFI is required to be notified via email listed in the policy. Requirement to notify customers is documented and customer contact list is available. Additional programs and templates that are created to conduct the recall if needed are: Food Recall Letter, Food Recall Response Form, Recalled Product Form- Receiving Department and Supplier Contact information and services. The product withdrawal and recall system is challenged 1x/yearly and records maintained. Records sighted: Records of mock recall 03/04/2024, scenario is vendor initiated recall. 100% mass balance was achieved 1.50 minutes, 50 cases were traced. Lot number 96240702. This site has had an actual vendor initiated recall, documented recall information dated 11/29/2024, including recall initiation, SQF notification form (Food Safety event form) dated 12/16/2024, SQFI and CB were notified within 24 hours since the notification from the supplier was received. Recall SOP was followed including customer notification, product segregation and necessary legal and regulatory procedures outlined in the policy.

2.6.3 - Crisis Management Planning

2.6.3.1 - The methods and responsibility for execution of a crisis management plan shall be documented and implemented. The plan shall include: i. A list of known potential dangers (e.g., flood, drought, fire, tsunami, or other severe weather or regional events such as pandemic, warfare, or civil unrest) that can impact the site's ability to deliver safe food; ii. Designated site management responsible for decision making, oversight, communications, and management of the crisis management plan; and iii. Control measures to ensure any affected product is identified, isolated, and dispositioned appropriately.

Response: Compliant

2.6.3.2 - The crisis management plan shall be reviewed, tested, and verified at least annually with gaps and appropriate corrective actions documented. Records of reviews of the crisis management plan shall be maintained.

Response: Compliant

Summary -

Response: A Facility specific crisis management and business continuity plan has been documented and implemented. Crisis Checklist, Crisis management log and Threat report log comprise the implemented program. QA and Senior management are responsible for program maintenance. Cross-functional crisis team is established and includes CEO, Director of Operations, Director of Human resources , IT manager, Crisis controls are defined and documented. Measures to evaluate and protect the product in case of crisis are documented. Types of crisis covered in the program include natural disasters, civil unrest, fire, pandemic, power outage etc. Crisis management plan is reviewed and validated annually. Records are maintained. Records sighted: Crisis management challenge (mock crisis) dated 01/17/2025, Scenario contaminated water.

2.7.1 - Food Defense Plan (Mandatory)

2.7.1.1 - A food defense threat assessment shall be conducted to identify potential threats caused by a deliberate act of sabotage or terrorist-like incident.

Response: Compliant

2.7.1.2 - A food defense plan shall be documented, implemented, and maintained based on the threat assessment (refer to 2.7.1.1). The food defense plan shall meet legislative requirements as applicable and shall include at a minimum: i. The methods, responsibility, and criteria for preventing food adulteration caused by a deliberate act of sabotage or terrorist-like incident; ii. The name of the senior site management person responsible for food defense; iii. The methods implemented to ensure only authorized personnel have access to production equipment and vehicles, manufacturing, and storage areas through designated access points; iv. The methods implemented to protect sensitive processing points from intentional adulteration; v. The measures taken to ensure the secure receipt and storage of raw materials, ingredients, packaging, equipment, and hazardous chemicals to protect them from deliberate acts of sabotage or terrorist-like incidents; vi. The measures implemented to ensure raw materials, ingredients, packaging (including labels), work-in-progress, process inputs, and finished products are held under secure storage and transportation conditions; and vii. The methods implemented to record and control access to the premises by personnel, contractors, and visitors.

Response: Compliant

2.7.1.3 - Instruction shall be provided to all relevant personnel on the effective implementation of the food defense plan (refer to 2.9.2.1).

Response: Compliant

2.7.1.4 - The food defense threat assessment and prevention plan shall be reviewed and tested at least annually or when the threat level as defined in the threat assessment changes. Records of reviews of the food defense plan shall be maintained.

Response: Compliant

Summary -

Response: Food Defense policy is documented and implemented, rev date 01/24/2025, the purpose of this policy is to describe the expectations to be used by the facility to control/minimize the potential for intentional food contamination. The food defense plan documents the food defense planning process and serves as a record of the facility's food defense strategy. It is the responsibility of the site's management and the QA department to ensure a strategy has been established and is implemented. Food Defense committee is

established, The site's food defense plan is created using FDA template and guidance dated 01/24/2025. Food defense measures in the facility include: restricted access to the production and storage areas of the facility, background checks, deliveries from approved suppliers only as per the PO, 24 hour surveillance. The dock areas of the facility are locked the area ensures secure receipt and storage of product, including product identification, assignment of responsibilities for ensuring the product identification. The system is required challenged via annual food defense drill. Records sighted: Mock food defense challenge scenario Unauthorized entry via reception area, dated 1/17/2025.

2.7.2 - Food Fraud (Mandatory)

2.7.2.1 - The methods, responsibility, and criteria for identifying the site's vulnerability to food fraud shall be documented, implemented, and maintained. The food fraud vulnerability assessment shall include the site's susceptibility to product substitution, mislabeling, dilution, and counterfeiting or stolen goods that may adversely impact food safety.

Response: Compliant

2.7.2.2 - A food fraud mitigation plan shall be developed and implemented, which specifies the methods by which the identified food fraud vulnerabilities shall be controlled and how the plan is communicated to relevant personnel to ensure effective implementation.

Response: Compliant

2.7.2.3 - The food fraud vulnerability assessment and mitigation plan shall be reviewed and verified at least annually with gaps and corrective actions documented. Records of reviews shall be maintained.

Response: Compliant

Summary -

Response: Food Fraud Vulnerability Assessment, dated 01/14/2025 , that identifies potential threats that can be caused by a deliberate act of sabotage or terrorist-like incident. The site has drafted a General Produce vulnerability assessment overview, completed on 01/14/2025 included methods, responsibilities, and criteria for identifying the site's vulnerability to food fraud, including susceptibility to substitution, finished product mislabeling, dilution, and counterfeiting. The site has developed a Food Fraud Mitigation Plan, dated 01/17/2025 to address the control of the identified food fraud vulnerabilities which also includes incident response including immediate quarantine, investigation, notification and corrective actions. Instructions have been provided to all relevant staff by means of meeting and training. The Vulnerability Assessment and Mitigation Plan were last reviewed on 01/14/2025 by SQFP. There is a list of all products stocked at the warehouse with their associated food fraud.

2.8.1 - Allergen Management (Mandatory)

2.8.1.1 - The methods and responsibility for the control of allergens and to prevent sources of allergens from contaminating product shall be documented and implemented. The allergen management program shall include: i. A hazard and risk analysis and control measures of those agricultural inputs and processing aids, including food grade lubricants, that contain food allergens (refer to food safety plan 2.4.3); ii. An assessment of workplace-related food allergens that may originate from change rooms, vending machines, lunchrooms, and visitors; iii. A list of allergens that is applicable in the country of production and the country (ies) of destination if known; iv. A list of allergens that is accessible by relevant personnel; and v. Individual management plans for control of the identified allergens.

Response: Compliant

2.8.1.2 - Product labeling, in accordance with regulatory requirements, shall include allergens where risks from cross-contamination have been documented.

Response: Compliant

Summary -

Response: Allergen management program is documented and implemented, rev date 01/07/2025. This site handles all major allergens Allergens are identified, stored in a segregated area, employees are trained on the implemented program. QA oversees and maintains program. The allergen stickers are used to label incoming ingredients containing allergens. To minimize allergen cross-contact during production allergen swabbing is done post cleaning and sanitation. The program includes a risk assessment of raw materials and processing aids and an assessment of workplace allergens. Allergen signage is posted throughout the facility. Allergen spill procedure is documented and employees are trained. Records sighted: allergen register, updated 01/02/2025. Practices consistent with the implemented policy were observed during the facility tour.

2.9.1 - Training Requirements

2.9.1.1 - The responsibility for establishing and implementing the training needs of the organization's personnel to ensure they have the required competencies to carry out those functions affecting products, legality, and safety shall be defined and documented (refer to 2.1.1.6).

Response: Compliant

2.9.1.2 - Appropriate training shall be provided for personnel carrying out the tasks essential to the effective implementation of the SQF System and the maintenance of food safety and regulatory requirements.

Response: Compliant

Summary -

Response: Employee training program outlines requirements for employee training. All employees including CCP monitors, production employees, sanitation, maintenance and shipping/receiving employees are trained in Food Safety and HACCP. SSOP training is implemented. Training frequency is reflected in the policy (at the time of hiring and once/year refresher).

2.9.2 - Training Program (Mandatory)

2.9.2.1 - A training program shall be documented and implemented. It shall outline the necessary competencies for specific duties and the training methods to be applied to relevant personnel upon initial hire and for ongoing refresher training. The training program shall include at a minimum: i. Appropriate HACCP training for personnel involved in developing and maintaining food safety plans; ii. Monitoring and corrective action procedures for all personnel engaged in operating critical control points (CCPs); iii. Personal hygiene training for all personnel involved in the handling of food products and food contact surfaces; iv. Good Agricultural/Operating Practices for all personnel engaged in food handling operations; v. Allergen management, food defense and food fraud for all relevant on-site personnel; and vi. Identification and implementation of refresher training.

Response: Compliant

2.9.2.2 - Training materials, the delivery of training, and work instructions on all tasks critical to meeting regulatory compliance and the maintenance of food safety shall be provided in language(s) understood by personnel.

Response: Compliant

2.9.2.3 - Training records shall be maintained and include: i. Participant name; ii. Skills description; iii. Description of the training provided; iv. Date training completed; v. Trainer or training provider; and vi. Verification that the trainee is competent to complete the required tasks.

Response: Compliant

Summary -

Response: Employee training program outlines requirements for employee training. All employees including CCP monitors, production employees, sanitation, maintenance and shipping/receiving employees are trained in Food Safety and HACCP. SSOP training is implemented. Training frequency is reflected in the policy (at the time of hiring and once/year refresher). Training schedule is documented and includes topic, target audience, frequency and document. Topics include Allergen Control, Food Defense Plan, Business Continuity Program, Chemical Handling, Foreign Material Training, Hold and Release Program, Personal Protective Equipment, Organic, CCP's, Storage Practices, Descriptors Training, QC Sampling and Approval, Product Identification and Process Workflow, R&D SQF Implementations, Sustainability Plan, HACCP Training, SQF, Lock Out Tag Out, Environmental Monitoring and Quality Control Sample and Test Methods. There is a training presentation on GMP basic training Records sighted: training records dated shipping and receiving lead and QC lead, both dated 03/2025, GMP training.

10.1.1 - Premise Exterior

10.1.1.1 - The location and construction of the premises and building shall ensure that: i. Adjacent and adjoining buildings, operations, and land use do not interfere with safe and hygienic operations; and ii. Relevant regulatory authority approval has been obtained and is on file.

Response: Compliant

10.1.1.2 - The methods and responsibilities applied to maintain a suitable exterior environment shall be documented and implemented. These include: i. Effective, periodic monitoring and/or inspection of the premises, the surrounding areas, storage facilities, machinery, and equipment; ii. Controls to ensure that the exterior is kept free of waste and/or accumulated debris to prevent the attraction of pests and vermin; iii. Paths, roadways, loading and unloading areas are adequately drained and maintained; and iv. Records of inspections and correction actions are maintained.

Response: Compliant

Summary -

Response: Document Premises Location and Approval is on file and assesses all possible risks in this facility. This facility is located in a rural area surrounded by the fields, the main risks listed in the policy and assessed to be relevant are rodents and snakes, and fire hazard from the dry vegetation. The methods and responsibilities for monitoring conditions of the building and its surroundings is documented in the audits and inspections document. This also includes control of waste and maintenance of roads and parking lots. The facility was observed to be in good condition during the audit tour. Records sighted: Monthly GMP audit dated 04/16/2024, 07/15/2024, 09/24/2024, 10/31/2024, 12/17/2024, 02/24/2025.

10.1.2 - Building Interior

10.1.2.1 - Floors shall be constructed of smooth, dense, impact-resistant material that can be effectively graded,

drained, easily cleaned, and is impervious to liquid. Floors shall be suitably sloped toward the floor drains at gradients to allow the effective removal of all overflow or wastewater under normal working conditions. Where floor drainage is not possible, plumbed options or other control measures shall be in place to handle overflow or wastewater.

Response: Compliant

10.1.2.2 - Drains and waste/material trap systems shall be constructed and located so that they can be easily cleaned and not present a hazard to products.

Response: Compliant

10.1.2.3 - Walls, partitions, ceilings, and doors shall be of durable construction. Internal surfaces shall have even, smooth light-colored finishes, be impervious to liquids, and shall be kept clean (refer to 10.2.5). Wall-to-wall and wall-to-floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of food debris. Drop ceilings, where present, shall be constructed to enable monitoring for pest activity, facilitate cleaning, and provide access to utilities.

Response: Compliant

10.1.2.4 - Ducting, conduit, and pipes that convey products or services, such as steam or water, shall be designed and constructed to prevent the contamination of food, ingredients, and food contact surfaces and allow ease of cleaning (refer to 10.3.2).

Response: Compliant

10.1.2.5 - Adequate ventilation shall be provided in enclosed product handling and storage areas and meet commodity-specific regulations where applicable. All ventilation equipment and devices shall be adequately cleaned per the cleaning and sanitation program.

Response: Compliant

10.1.2.6 - Pipes carrying sanitary waste or wastewater that are located directly over product lines or storage areas shall be designed and constructed to prevent the contamination of food, materials, ingredients, and food contact surfaces, and shall allow ease of cleaning.

Response: Compliant

10.1.2.7 - Doors, hatches, and windows and their frames in food handling or storage areas shall be of a material and construction that meets the same functional requirements for internal walls and partitions. Doors and hatches shall be of solid construction, and windows shall be made of shatterproof glass or similar material.

Response: Compliant

10.1.2.8 - Stairs, catwalks, and platforms in food processing and handling areas shall be designed and constructed so they do not present a product-contamination risk and with no open grates directly above exposed food product surfaces. They shall be kept clean (refer to 10.3.2).

Response: N/A

Evidence: • No stairs, catwalks or platforms are present in the facility- NA (10.1.2.8).

10.1.2.9 - The inspection/quality control area shall be provided with facilities that are suitable for examination and testing of the type of product being handled/packed (refer to 2.4.4 for internal lab requirements). The inspection area shall: i. Have easy access to handwashing facilities; ii. Have appropriate waste handling and removal; and iii. Be kept clean to prevent product contamination.

Response: Compliant

10.1.2.10 - Lighting and light fixtures in product handling areas, inspection stations, ingredient/ input and packaging storage areas, and all areas where the product is exposed shall be: i. Of appropriate intensity to enable personnel to carry out tasks efficiently and effectively; and ii. Shatterproof, manufactured with a shatterproof covering, or fitted with protective covers. Where fixtures cannot be recessed, including in warehouses, structures must be protected from accidental breakage, manufactured from cleanable materials, and addressed in the cleaning and sanitation program.

Response: Compliant

Summary -

Response: Floors , walls and ceiling were adequate, cleanable and maintained in a master maintenance schedule. No waste traps or drop ceilings, surfaces and walls were cleanable as observed during the facility walk through. Floors were sloped towards the drains and were observed to be clean with no standing water. Quality inspection area for incoming produce was well lit and stocked with all essentials, and easy access to the hand washing station. It was clean and well maintained. Pipes carrying condensate were sealed well, with no leakages or poor joints. They are maintained on the master maintenance schedule and checked regularly. No dripping condensate was observed during the audit Doors are adequately sealed. Lighting fixtures were appropriately installed, in good condition, shatter proof and inspected as part of the glass and brittle plastic inspection. Adequate ventilation was observed in the facility. No stairs, catwalks or platforms are present in the facility- NA (10.1.2.8).

10.1.3 - Dust, Insect, and Pest Proofing

10.1.3.1 - All external windows, ventilation openings, doors, and other openings shall be effectively sealed when closed and proofed against dust, vermin, and other pests. External personnel access doors shall be provided. They shall be effectively insect-proofed and fitted with a self-closing device and proper seals to protect against ingress of dust, vermin, and other pests.

Response: Compliant

10.1.3.2 - External doors, including overhead dock doors in food handling areas used for product, pedestrian, or truck access, shall be designed and maintained to prevent pest entry by at least one or a combination of the following methods: i. A self-closing device; ii. An effective air curtain; iii. A pest-proof screen; iv. A pest-proof annex; and v. Adequate sealing around trucks in docking areas.

Response: Compliant

10.1.3.3 - Electric insect control devices, pheromone, or other traps and baits shall be located and operated so they do not present a contamination risk to the product, packaging, containers, or operating equipment. Poison rodenticide bait shall not be used inside packing rooms, product storage areas, or food handling areas.

Response: Compliant

Summary -

Response: Doors, windows and man doors were appropriately sealed, pest control devices observed at the manufacturing didn't present threat to the product and were installed as per the Pest Control Provider's specifications. Air curtains were in good condition and inspected regularly. Sealing around truck doors was observed to be in fair condition. No poisoned traps are used on the interior of the facility. External personnel access doors/man doors were found to be in good condition and sealed well.

10.2.1 - Equipment and Utensils

10.2.1.1 - The methods and responsibility for purchasing and specifications development for equipment and utensils shall be documented and implemented. The methods shall ensure that equipment and utensils: i. Are designed, constructed, installed, and operated so as not to pose a threat to products; and ii. Meet any applicable regulatory requirements.

Response: Compliant

10.2.1.2 - Product contact surfaces and those surfaces not in direct contact with product in product handling areas, raw material storage, packaging material storage, and cold storage areas shall be constructed of materials that will not contribute to a food safety risk.

Response: Compliant

10.2.1.3 - Benches, tables, conveyors, shellers, graders, packers, and other mechanical equipment shall be hygienically designed and located for appropriate cleaning. Equipment surfaces shall be smooth, impervious, and free from cracks or crevices.

Response: Compliant

10.2.1.4 - Product containers, tubs, and bins used for edible and inedible material shall be constructed of materials that are non-toxic, smooth, impervious, and readily cleaned per the cleaning and sanitation program. Bins used for inedible material shall be clearly identified.

Response: Compliant

10.2.1.5 - All equipment and utensils shall be cleaned after use and be stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination.

Response: Compliant

10.2.1.6 - Vehicles and/or other devices used to transport and move products in food contact, handling, or processing zones, or cold storage rooms shall be designed and operated so as not to present a food safety hazard.

Response: Compliant

Summary -

Response: Utensils and containers observed during the audit were made of stainless steel (knives and box cutters). and were designed for ease of cleaning. Knife and sharps control program is implemented: knives are issued at the beginning of a shift and then turned in and inspected at the end of a shift. MHE was observed to be in clean and well maintained condition. Non-conforming equipment is locked out tagged out and logged on Non-conforming product or equipment log. Facility design is intended to prevent contamination: floors, walls, and ceilings may be adequately cleaned and kept clean and well maintained. Facility has adequate space for equipment and storage of materials. Separation of operations and hygienic zoning and sanitary partitions and separate airflow systems are present. Tubs/trays used to store fully packaged products are cleaned and sanitized as per the implemented SSOP, which was reviewed during the audit. That is the only equipment used to store product in this facility. Racks are cleaned regularly and inspected. The auditor reviewed SSOP for Akiro Bins (rev date 03/20/2025), Master maintenance schedule indicates that the racks are cleaned weekly including roller racks used in the facility.

10.2.2 - Equipment Maintenance and Repair

10.2.2.1 - The methods and responsibility for the maintenance and repair of equipment and buildings and facilities shall be documented, planned, and implemented in a manner that minimizes the risk of product, packaging, or equipment contamination. The methods shall include procedures to ensure: i. Routine preventive maintenance of facilities and equipment in any food handling or storage area is performed according to a maintenance control schedule; ii. Preventive maintenance and repair of items identified as impacting food safety controls and practices are prioritized for completion according to defined schedules or immediately when they are not properly functioning; and iii. Records are maintained for all preventive maintenance and equipment failure/immediate repair activities and corrective actions. The maintenance schedule shall cover buildings, equipment, and other areas of the premises critical to the maintenance of product safety and quality.

Response: Compliant

10.2.2.2 - The maintenance supervisor and/or site supervisor shall be informed when repairs or maintenance are undertaken in product handling or storage areas and when the activities pose a potential threat to product safety (e.g., pieces of electrical wire, damaged light fittings, and loose overhead fittings). When possible, maintenance is to be conducted outside operating times.

Response: Compliant

10.2.2.3 - Temporary repairs, where required, shall not pose a food safety risk, and shall be included in the cleaning program and/or routine inspections. There shall be a plan in place to address the completion of temporary repairs to ensure they do not become permanent solutions.

Response: Compliant

10.2.2.4 - Equipment located over product or product conveyors shall be lubricated with food-grade lubricants, and their use shall be controlled to minimize the contamination of the product.

Response: N/A

Evidence: • No equipment is located over exposed product or product conveyors- NA (10.2.2.4)

10.2.2.5 - Paint used in a food handling or contact zone shall be suitable for use, in good condition, and shall not be used on any product contact surface.

Response: Compliant

10.2.2.6 - Compressed air systems, and systems used to store or dispense other gases used in the operational process that come into contact with food or food contact surfaces, shall be maintained and regularly monitored for quality and applicable food safety hazards.

Response: N/A

Evidence: • Compressed air is not used in this facility- NA (10.2.2.6)

Summary -

Response: Repairs and Maintenance policy rev date 01/09/2025 is documented and implemented. Master maintenance schedule (Maintenance Control schedule) that includes building materials, doors, racking and equipment is established and was verified to be maintained during the audit via interviews and reviewing PM's. which is consistent with manufacturer's instructions for the equipment. Equipment failures or area restrictions are recorded in Non-conforming product/equipment/area log. QA is notified when the repairs are performed. Maintenance is done via 3rd party providers, there is no in- house maintenance crew. Provision for temporary repairs is documented- no evidence of temporary repairs was observed during the facility tour. Maintenance staff and contractors are required to remove all tools and debris from any maintenance activity

once its been completed and inform the Quality and production so that the cleaning and inspection can be completed. No paint used in the production zone. Compressed air is not used in this facility- NA (10.2.2.6); No equipment is located over exposed product or product conveyors- NA (10.2.2.4). Records sighted: Maintenance control schedule which includes frequency, task, priority, hours of service, checklists for condensing units maintenance, records of condensing units cleaning dated 03/22/2024, 06/11/2024, 03/25/2024, evaporators cleaning for 2024 with frequency of cleaning which is dependent on the area of the facility. Master maintenance schedule for Banana rooms was reviewed during the audit, with service interval of 3 months for all equipment (filters) located in this area, repack maintenance and cleaning (evaporators are cleaned quarterly). Corrective action dated 02/28/2025 (issue with compressor variance, which was slight and didn't affect product safety). Verified and completed 03/07/2025.

10.2.3 - Maintenance Personnel and Contractors

10.2.3.1 - Maintenance personnel and contractors shall comply with the site's personnel and operational hygiene requirements (refer to 10.5).

Response: Compliant

10.2.3.2 - All maintenance and other engineering contractors required to work on-site shall be trained in the site's food safety and hygiene procedures or shall be escorted at all times until their work is completed.

Response: Compliant

10.2.3.3 - Maintenance personnel and contractors shall remove all tools and debris from any maintenance activity once it has been completed and inform the area supervisor and maintenance supervisor so appropriate hygiene and sanitation can be conducted and a pre-operational inspection completed prior to the restarting of site operations. Maintenance, operations, and/or sanitation shall sign-off on communications.

Response: Compliant

Summary -

Response: Contractors working on the facility extensions are trained on GMP procedure upon arrival and are always escorted during their visit to ensure compliance. Maintenance staff and contractors are required to remove all tools and debris from any maintenance activity once its been completed and inform the Quality and production so that the cleaning and inspection can be completed. Records sighted: GMP training for visitors, contractors and maintenance for a fork lift maintenance provider dated 01/08/2025.

10.2.4 - Calibration

10.2.4.1 - The methods and responsibility for calibration and re-calibration of measuring, testing, and inspection equipment used for monitoring activities outlined in Good Operating Practices, food safety plans, and other process controls or to demonstrate compliance with customer specifications shall be documented and implemented. The procedures shall ensure: i. Calibration is performed according to regulatory requirements and/or the equipment manufacturer's recommended schedule; ii. Calibrated measuring, testing, and inspection equipment is protected from damage and unauthorized adjustment; iii. Affected product is handled according to non-conforming product procedures when equipment is found to be out of calibration; iv. Software used for calibration activities is effective and appropriate; and v. Records of calibration activities are maintained.

Response: Compliant

10.2.4.2 - Equipment shall be calibrated against manufacturer, national or international reference standards and

methods, or to an accuracy appropriate to its use. In cases where standards are not available, the site shall provide evidence to support the calibration reference method applied.

Response: Compliant

Summary -

Response: Policy Calibration is established and implemented, SQFP or substitute oversee the program. Directory of calibration equipment is on file along with frequency, responsibility and verification. Instructions for product potentially affected by out of calibration equipment is documented. Equipment is calibrated against NIST. Records of calibration activities are retained. Scales are calibrated annually, ATP luminometer is calibrated monthly, thermometers are calibrated weekly, Infrared Guns are calibrated daily, EV units are calibrated annually and Clean and Sanitizer diution checks are recorded and calibrated weekly. Records sighted: Quality Control Weekly Temperature probe worksheet, for 2024 (54 weeks) and 13 first week of 2025, NIST certification Asset #Q018947, dated 03/10/2025 for the pocket thermistor, Annual scale calibration for scale serial number EQ 1931129 dated 03/19/2025 and EQ 1931134 dated 03/19/2025. Calibration for luminometer, ATP calibraiton log dated 1/26/2024, 06/05/2024, 08/06/2024, 12/2/2024 (calibrated monthly as per the established policy).

10.3.1 - Pest Prevention

10.3.1.1 - The methods and responsibility for pest prevention shall be documented and effectively implemented. The pest prevention program shall: i. Describe the methods and responsibility for the development, implementation, and maintenance of the pest prevention program; ii. Record pest sightings and trend the frequency of pest activity so as to target pesticide applications; iii. Outline the methods used to prevent pest problems; iv. Outline the pest elimination methods and the appropriate documentation for each inspection; v. Outline the frequency with which pest status is to be checked; vi. Include the identification, location, number, and type of bait stations set on a site map; vii. List the chemicals used. They are required to be approved by the relevant authority, and their Safety Data Sheets (SDS) made available; viii. Outline the methods used to make personnel aware of the bait control program and the measures to take when they come into contact with a bait station; ix. Outline the requirements for personnel awareness and training in the use of pest and vermin control chemicals and baits; and x. Measure the effectiveness of the program to verify the elimination of applicable pests and to identify trends.

Response: Compliant

10.3.1.2 - Pest contractors and/or internal pest controllers shall: i. Be licensed and approved by the local relevant authority; ii. Use only trained and qualified operators, who comply with regulatory requirements; iii. Use only approved chemicals; iv. Maintain a site map indicating the location of bait stations, traps, and other applicable pest control/monitoring devices; and v. Report to a responsible authorized person on entering the premises and after the completion of inspections or treatments.

Response: Compliant

10.3.1.3 - Inspections for pest activity shall be conducted on a regular basis by trained personnel and the appropriate action taken if pests are present. Identified pest activity shall not present a risk of contamination to food products, raw materials, or packaging. Records of pest activity inspections and pest control devices shall be maintained.

Response: Compliant

10.3.1.4 - Food products, raw materials, or packaging that are found to be contaminated by pest activity shall be

effectively disposed of, and the source of pest infestation shall be investigated and resolved. Records shall be kept of the disposal, investigation, and resolution.

Response: Compliant

10.3.1.5 - No domestic animals shall be permitted on the site in food handling or storage areas

Response: Compliant

Summary -

Response: Pest control program Document # is documented and implemented. The purpose of the policy is to describe the integrated pest management process to ensure that the warehouse and surrounding areas are managed so as not to attract pests or vermin. It is the responsibility of the site's Quality department working through a contracted approved 3rd party PCO to deploy these requirements. . The site maintained current business license, current pest control licenses for all operators/technicians, that service the site, a list of approved chemicals to be used and their SDSs, a facility map showing the location, number and type of every pest device (including temporary placements of the pest monitoring devices for short term monitoring). Records/reports of at least the last 12 months of inspections, including pest sightings, treatments and observations/recommendations and the corrective actions taken as needed. Toxic bait is to be used in the exterior devices only. on the interior of both the facility and the warehouse only glue traps or other mechanical traps are used. All devices are approved devices by the PCO Frequency of inspections is required to be minimally 1x/week or more often as needed for each individual facility. All findings must be addressed by the site management. Exterior area adjacent to the building including but not limited to weeds, grass, storage of equipment must be done to minimize the potential for east harborage. Pest management must be included in the general new hire orientation. Disposition for products potentially affected by the pest activity is that they should be effectively disposed of/destroyed. Pest activity shall be trended at least quarterly to verify the elimination of applicable pests and the entire plan must be reviewed at least annually during management review meetings. This facility doesn't store any pesticides on premises- NA (12.2.4.5). Records sighted: Business License of PCO issued by the state of CA expiring 12/31/2025, Pest control business license #32478 expiration date 12/31/2026, applicator license expiration date 06/30/2025, 02/11/2025, service reports dated 08/13/2024, 08/21/2024, , 08/27/2024, 09/04/2024, 10/08/2024, 10/22/2024, 11/19/2024, 12/24/2024. Trend report for 2024 was on file and reviewed.

10.3.2 - Cleaning and Sanitation

10.3.2.1 - The methods and responsibility for cleaning of the product handling equipment and environment shall be documented and implemented. Cleaning procedures and schedules shall include: i. A list of equipment, utensils, and storage areas that require periodic cleaning; ii. Instructions on how cleaning is performed for the various areas and equipment; iii. The frequency of when cleaning is to be completed; iv. Personnel responsible and the methods used to verify the effectiveness of the cleaning and sanitation program (e.g., validation of procedures, concentration of detergents and sanitizers); and v. Records of cleaning activities and effectiveness reviews/inspections are maintained.

Response: Minor

Evidence: • NCF: SSOP for cleaning and sanitizing including methods, frequency and responsibility for the banana probe was not available during the audit (10.3.2.1)

Root Cause: The nonconformance occurred because there was no documented Sanitation Standard Operating Procedure (SSOP) for cleaning banana room probes. While standard practice requires discarding all probed fruit, the unique use of probes in banana rooms—where fruit cannot always be discarded—was overlooked. This gap led

to inconsistent sanitation practices and potential contamination risks.

Corrective Action: The development and implementation of an SSOP outlining the proper cleaning and sanitation of the banana room probes. Training has been conducted as well to ensure staff knows the procedures and follows the SSOP.

Verification Of Closeout: Auditor Katie Das has reviewed the corrective evidence provided (document Corrective Action 04/04/2025 -Ripening Room Probes" which contains root cause analysis for the Non-conformity, and the corrective action. The site has implemented the sufficient way of inspecting and effectively cleaning the banana room probes.

Completion Date: April 4, 2025

Closeout Date: April 11, 2025

10.3.2.2 - Detergents and sanitizers shall be suitable for use in a food handling environment, labeled according to regulatory requirements, and purchased in accordance with applicable legislation. The organization shall ensure: i. The site maintains a list of chemicals approved for use; ii. An inventory of all purchased and used chemicals is maintained; iii. Detergents and sanitizers are properly stored as per the storage program; iv. Safety Data Sheets (SDS) are provided for all detergents and sanitizers purchased; and v. Only trained personnel handle sanitizers and detergents.

Response: Compliant

10.3.2.3 - Detergents and sanitizers that are mixed for use shall be correctly mixed according to the manufacturer's instructions, stored in containers that are suitable for use, and clearly identified. Mix concentrations shall be verified, and records maintained.

Response: Compliant

10.3.2.4 - Suitably equipped areas shall be designated for cleaning product containers, knives, cutting boards, and other utensils. Racks and containers for storing cleaned utensils and protective clothing shall be clearly identified and maintained in a manner that prevents contamination of products, equipment, or storage areas.

Response: Compliant

10.3.2.5 - Pre-operational inspections shall be conducted following cleaning and sanitation operations to ensure food handling areas, product contact surfaces, equipment, personnel amenities, sanitary facilities, and other essential areas are clean before the start of operations. Pre-operational inspections shall be conducted by qualified personnel and records maintained.

Response: Compliant

10.3.2.6 - Staff amenities, sanitary facilities, and other essential areas shall be inspected by qualified personnel at a defined frequency to ensure the areas are clean.

Response: Compliant

10.3.2.7 - The responsibility and methods used to verify the effectiveness of the cleaning procedures shall be documented and implemented. A verification schedule shall be prepared. A record of pre-operational hygiene inspections, cleaning and sanitation activities, and verification activities shall be maintained.

Response: Compliant

Summary -

Response: Cleaning and Sanitation policy rev date 01/10/2025 is documented and implemented. Master sanitation schedule is established and current. The entire facility and grounds are in scope of the schedule.

Sanitation is performed by trained 3rd party provider. FSQA Supervisor/SQFP oversees the program. All food surface contact areas in the repack room are to be cleaned and sanitized with the approved sanitizer. The sanitizer is verified monthly with a sanitizing strip. SDS for the quat based sanitizer was reviewed during the audit. Pre- operational inspections are conducted by the person responsible for the repack area. Cleanliness is verified via ATP swabs and the implemented EMP program. SSOP for Akiro Bins (rev date 03/20/2025) and for the rolling racks and drain cleaning have been reviewed during the audit. Dr Master maintenance schedule indicates that the racks are cleaned weekly including roller racks used in the facility. Records sighted: Weekly dilution testing results for January- December 2024 (weekly checks). Pre-operational ATP verifications log "Repack cleaning Schedule for 1/1/2025-1/29/2025). Sanitation schedule included drain cleaning records (done at least weekly or more often as need) and records maintained. NCF: SSOP for cleaning and sanitizing including methods, frequency and responsibility for the banana probe was not available during the audit (10.3.2.1)

10.4.1 - Personnel Practices

10.4.1.1 - A documented and implemented procedure for personal hygiene and personnel practices shall ensure that personnel engaged in the handling of product use appropriate personal hygiene practices. The procedure shall include instructions that: i. Jewelry and other loose objects that pose a threat to the safety of the product are not worn or taken into any product handling or storage operations. ii. Fingernail polish, artificial nails, and long nails are not permitted where product is handled with bare hands; iii. False eyelashes and eyelash extensions are not permitted; iv. Hair restraints are used where product is exposed; and v. Smoking, chewing, eating, drinking (except for water which shall be available to all personnel), or spitting are not permitted in any packing or storage areas. Note: The wearing of plain bands with no stones or jewelry accepted for religious or cultural reasons and prescribed medical alert bracelets can be permitted; however, the site will need to consider its customer requirements and the applicable food legislation. Personnel and visitor practices, including all those listed in 10.4.1, shall be routinely monitored for compliance, and any resulting corrective actions implemented and recorded for personnel who violate food safety practices. Code Amendment #1 A medical screening procedure shall be in place for all employees, visitors and contractors who handle exposed product or food contact surfaces.

Response: Compliant

10.4.1.2 - Personnel who are known to be carriers of infectious diseases that present a health risk to others through the packing or storage processes shall not engage in packhouse operations.

Response: Compliant

10.4.1.3 - Procedures and responsibilities shall be in place that specify the handling of product and/or product contact surfaces that have been in contact with or exposed to blood or other bodily fluids.

Response: Compliant

10.4.1.4 - Personnel with exposed cuts, sores, or lesions shall not be engaged in handling product or product contact surfaces. Minor cuts or abrasions on exposed parts of the body shall be covered with a suitable waterproof and colored dressing.

Response: Compliant

Summary -

Response: Policy Personal Welfare rev date 01/10/2025 is documented and implemented. The procedure includes but is not limited to employee requirements with contagious diseases or illnesses, visitors and contractor's requirements and break areas and restroom requirements and clean up procedure. Personnel

with exposed cuts, sores or lesions are prohibited from accessible borne pathogens spill kits are present and training on the program is conducted on an annual basis. No ill employees, open wounds or any other risk of contamination was observed during the facility walk through.

10.4.2 - Sanitary Facilities and Handwashing

10.4.2.1 - Toilet and handwashing facilities shall be provided and designed, constructed, and located in a manner that minimizes the potential risk for product contamination. The following shall be considered: i. There shall be sufficient toilet facilities for the maximum number of personnel, and they shall be constructed so they can be easily cleaned and maintained; ii. Handwash basins with clean and potable water, hand soap, disposable towels or effective hand drying devices, waste bins, and a tank that captures used handwash water for disposal (if not connected to drains) shall be provided inside or adjacent to toilet facilities and in accessible locations throughout food handling areas as required; iii. Signage in appropriate languages shall be provided adjacent to handwash basins instructing personnel to wash their hands after each toilet visit; iv. Racks for protective clothing used by personnel and visitors shall be provided; and v. Toilet and wash stations shall be maintained in clean and sanitary conditions. Tools/equipment used for cleaning toilet rooms shall not be used to clean operational areas.

Response: Compliant

10.4.2.2 - Personnel shall have clean hands, and hands shall be washed by all personnel, contractors, and visitors: i. On entering food handling areas, and before putting on gloves; ii. After each visit to a toilet; iii. After using a handkerchief; iv. After smoking, eating, or drinking; and v. After handling wash down hoses, cleaning materials, dropped products, or contaminated material.

Response: Compliant

10.4.2.3 - Sanitary drainage shall not be connected to any other drains within the premises and shall be directed to a septic tank or a sewerage system as per regulations.

Response: Compliant

Summary -

Response: Policy Handwashing, rev date 01/10/2025 is documented and implemented. It addresses hand washing requirements in this facility. Good handwashing practices were observed on site. Handwashing stations were present in the restrooms located throughout the facility and were observed to be in good condition and stocked with all essentials (hot water, soap, sanitizer, paper towels and GMP signage. Sanitary drainage is not cross-connected with any other connections or drains in the facility.

10.4.3 - Protective Clothing

10.4.3.1 - Protective clothing (e.g., uniforms and smocks) shall not pose a food safety threat or be a risk to product contamination. Protective clothing shall be: i. Manufactured from material that can be effectively maintained, stored, and laundered after use or at a frequency that does not create risks of cross-contact with products. Excessively soiled uniforms shall be changed or replaced where they become a product contamination risk; and ii. Temporarily stored on racks, when personnel leave operating areas or use toilet facilities and the clothing can be easily removed (e.g., smocks and aprons).

Response: Compliant

10.4.3.2 - Where applicable, clothing (i.e., any outer garment), including footwear, shall be in good condition, cleaned, and worn to protect product from the risk of contamination.

Response: Compliant

10.4.3.3 - Disposable gloves and aprons shall be changed after each break, upon re-entry into the processing area, and when damaged. Non-disposable aprons and gloves shall be cleaned and sanitized as required and, when not in use, stored on racks provided in the processing area or designated sealed containers in personnel lockers and not on packaging, ingredients, product, or equipment.

Response: Compliant

Summary -

Response: Protective clothing is observed in to be in good condition, protective clothing is used in the re-pack area, gloves of various sizes used in the facility are available to employees that work in the repack area. Disposable aprons are not used. The protective clothing is stored and cleaned to ensure protect contamination.

10.4.4 - Visitors

10.4.4.1 - All visitors, including management, shall be required to adhere to site personnel practices and specifically: i. Remove jewelry and other loose objects as per 10.4.1.1; ii. Wash hands as per 10.4.2.2; iii. Wear suitable clothing and footwear when entering any operational or food handling area; and iv. Enter and exit food handling areas through the proper entrance points.

Response: Compliant

10.4.4.2 - Visitors who are exhibiting visible signs of illness or have been in recent direct contact with other sites, animals, or produce shall be prohibited from entering any growing or product handling or harvesting operation.

Response: Compliant

Summary -

Response: Visitor and Contractor policy is documented and implemented. Contractor Safety briefing is documented. Visitors are required to be identified at arrival, briefed on the GDP and safety measures implemented on site, visitors that are exhibiting signs of illness are not permitted to enter the site, Drivers are not allowed to load and unload their trailers or get past a certain point in the warehouse typically beyond drivers lounge as per the documented and implemented shipping/receiving and visitor's policy as well as Food Defense policy implemented in this warehouse. Records sighted: GMP training for visitors, contractors and maintenance for a fork lift maintenance provider dated 01/08/2025.

10.4.5 - Personnel Amenities (change rooms, toilets, lunchrooms/breakrooms)

10.4.5.1 - Staff facilities shall be supplied with appropriate lighting and ventilation and provided to enable staff and visitors to: i. Change into and out of protective clothing, if applicable; ii. Store street clothing, footwear, and personal items separate from food handling, packing, and storage areas.

Response: Compliant

10.4.5.2 - Separate lunchroom and/or breakroom facilities shall be provided away from product contact/handling zones. Lunchrooms/breakrooms shall be: i. Ventilated and well lit; ii. Provided with adequate tables and seating to accommodate the maximum number of personnel at one sitting; iii. Equipped with a sink serviced with hot and cold potable water for washing utensils; iv. Equipped with refrigeration and heating facilities, enabling personnel to store or heat food and prepare non-alcoholic beverages if required; and v. Kept clean and free from waste

materials and pests.

Response: Minor

Evidence: • NCF: bread crumbs were found in the drawers in the lunch room, and food debris and spills were found under the trash cans in the lunch room (10.4.5.2)

Root Cause: the current day porter was instructed by his company to not open drawers while cleaning in the cafe (3rd party standard practice). Debris was also found under trash cans.

Corrective Action: After discussing with our sanitation company, this has been corrected. The day porter will open all accessible drawers and unlocked drawers (most are locked) for proper cleaning on a daily basis, as part of their scheduled cafe cleaning. The cleaning underneath the trash cans has been completed and will be checked frequently by their supervisor for completion. Additionally, we have added a section to our facility food safety inspection that captures the cafe. Any nonconformances can be captured during our scheduled inspections.

Verification Of Closeout: Auditor Katie Das has reviewed the root case analysis (day cleaner/sanitation crew) was instructed to not open drawers when cleaning. The auditor had a discussion about this, verified that the cleaning instructions to the office cleaning crew have been amended to include cleaning of the drawers and the bottoms of the garbage cans for the employees in the lunch room and the corrective action of cleaning the drawers has been performed. Non-conformance has been resolved.

Completion Date: April 7, 2025

Closeout Date: April 11, 2025

10.4.5.3 - Where outside eating areas are provided, they should be kept clean and free from waste materials and maintained in a manner that minimizes the potential for the introduction of contamination, including pests, to the site.

Response: Compliant

Summary -

Response: Staff amenities are adequate. Change rooms and locker rooms provided are adequate. Sanitary facilities are adequate. Lunchrooms were equipped with all essentials for safe food storage, handwashing, trash cans and GMP signage in English (language spoken in the facility). . The sewage back up procedures is outlined in the Personnel Hygiene, Disease Control, GDP's/GMP's visitors, Employee Welfare Areas policy. Practices observed during the audit were in compliance with the policy. NCF: bread crumbs were found in the drawers in the lunch room, and food debris and spills were found under the trash cans in the lunch room (10.4.5.2).

10.5.1 - Product Handling and Packaging Operations

10.5.1.1 - All personnel engaged in any food handling operations shall ensure that products and materials are handled and stored to prevent damage or product contamination. They shall comply with the following operational practices: i. No eating or tasting any product in the food handling/contact zone, except as noted in element 10.5.1.2; ii. Entry into operational areas is only through the personnel access doors; iii. All doors are kept closed. Doors are not open for extended periods when access is required for waste removal, or receiving and/or shipping of products, ingredients, or packaging. iv. Packaging, product, and ingredients are kept in appropriate containers as required and off the floor; v. Waste is contained in the bins identified for this purpose, removed from operational areas regularly, and not left to accumulate; and vi. All wash down and compressed air hoses are stored on hose racks after use and not left on the floor.

Response: Compliant

10.5.1.2 - In circumstances where it is necessary to undertake sensory evaluations in a food handling/contact zone, the site shall implement proper controls and procedures to ensure: i. Food safety is not compromised; ii. Sensory evaluations are conducted by authorized personnel only; iii. A high standard of personal hygiene is practiced by personnel conducting sensory evaluations; iv. Sensory evaluations are conducted in areas equipped for the purpose; and v. Equipment used for sensory evaluations is sanitized, maintained, and stored separately from operational equipment.

Response: Compliant

10.5.1.3 - The flow of personnel in food handling areas shall be managed so that the potential for contamination is minimized.

Response: Compliant

10.5.1.4 - Personnel practices and activities, including those listed in 10.5, shall be routinely monitored for compliance, and any resulting corrective actions implemented and recorded for personnel who violate food safety practices.

Response: Compliant

Summary -

Response: Good personnel processing practices were observed during the audit. Practices were compliant with requirements of the implemented GDP. There is no exposed food in the facility. Waste was taken out at the regular intervals, no evidence of eating or drinking was observed in the facility. Medical screening procedure is documented for all employees coming back to work from an illness. Visitors and contractors are screened for any signs of disease visually and are required to acknowledge the implemented GDP policy. Water in clear plastic containers is allowed in the dock area as per the policy. GDP Monthly audits are performed to verify compliance. Records sighted: Monthly GMP audit dated 04/16/2024, 07/15/2024, 09/24/2024, 10/31/2024, 12/17/2024, 02/24/2025.

10.5.2 - Control of Foreign Matter Contamination Operations

10.5.2.1 - The methods and responsibility for the prevention of foreign matter and glass contamination shall be documented and implemented. Procedures and resulting records shall ensure: i. Containers, equipment, and other utensils made of glass, porcelain, ceramics, brittle plastic, or similar materials are not permitted where exposed product is handled, unless clearly identified, required for effective operational controls, and regularly inspected; ii. Regular inspections are conducted to ensure food handling/contact zones areas are free of glass and brittle plastic and any items made from the previously identified materials are in good repair; iii. Wooden pallets and other wooden utensils or tools used in food handling/contact zones are dedicated for that purpose. Their condition is subject to regular inspection, and they are cleaned and maintained in good order; iv. Product handling areas are routinely inspected to remove risks from foreign material, such as debris, wood, stones, metal, detached/deteriorated equipment, and other physical hazards; and v. Personnel are to be made aware of their responsibility to adhere to the site's foreign matter and glass controls.

Response: Compliant

10.5.2.2 - Knives and cutting instruments used in product handling and packaging operations shall be controlled, kept clean, and well maintained. Snap-off blades shall not be used in manufacturing or storage areas.

Response: Compliant

10.5.2.3 - Gaskets and other equipment made of materials that can wear or deteriorate over time shall be

inspected on a regular frequency (refer to 2.5.4.3).

Response: Compliant

Summary -

Response: Control of Foreign material contamination rev date 03/11/2025 is documented and implemented. The purpose of this policy is to describe the practices used to prevent foreign matter. Foreign matter is defined as glass and brittle plastic and wood. This procedures includes but not limited to inspection of the facility, training of the employees to flag and report potential or actual contamination and requirements for regular facility inspection. Register of glass and brittle plastic objects is on file and is audited monthly. Wooden pallets are controlled to prevent wood contamination. The program is verified by weekly and monthly GDP inspections. No risk of contamination was observed during the facility walk through. Knives and sharps management program is documented and implemented. Personnel is trained on the policy and report any broken items that can lead to product contamination. Records sighted: glass and brittle plastic inspections for week 1-13 of 2025, monthly GDP inspections, Monthly GMP audit dated 04/16/2024, 07/15/2024, 09/24/2024, 10/31/2024, 12/17/2024, 02/24/2025.

10.5.3 - Detection of Foreign Objects Operations

10.5.3.1 - The responsibility, methods, and frequency for monitoring, maintaining, calibrating, and using screens, sieves, filters, or other technologies to remove or detect foreign matter shall be documented and implemented.

Response: N/A

Evidence: • No Foreign material detection equipment is used in this facility- NA (10.5.3.1- 10.5.3.3 and 10.5.3.5)

10.5.3.2 - Metal detectors or other physical contaminant detection technologies shall be routinely monitored, validated, and verified for operational effectiveness. The equipment shall be designed to isolate defective product and indicate when it is rejected.

Response: N/A

Evidence: • No Foreign material detection equipment is used in this facility- NA (10.5.3.1- 10.5.3.3 and 10.5.3.5)

10.5.3.3 - Records shall be maintained of the inspection of foreign object detection devices and any products rejected or removed by them. Records shall include any corrective and preventative actions resulting from the inspections.

Response: N/A

Evidence: • No Foreign material detection equipment is used in this facility- NA (10.5.3.1- 10.5.3.3 and 10.5.3.5)

10.5.3.4 - In all cases of foreign matter contamination, the affected batch or item shall be isolated, inspected, reworked, or disposed of. Records shall be maintained of the disposition.

Response: N/A

Evidence: • No Foreign material detection equipment is used in this facility- NA (10.5.3.1- 10.5.3.3 and 10.5.3.5)

10.5.3.5 - In circumstances where glass or similar material breakage occurs, the affected area shall be isolated, cleaned, and thoroughly inspected (including cleaning equipment and footwear), and the completed actions approved by a suitably responsible person before restarting operations.

Response: Compliant

Summary -

Response: Glass spill procedure is documented and implemented. No Foreign material detection equipment is used in this facility- NA (10.5.3.1- 10.5.3.3 and 10.5.3.5)

10.5.4 - Receiving and Shipping

10.5.4.1 - Personnel conducting receiving activities shall ensure agricultural inputs, packaging materials, and product are not contaminated during the unloading process. Work instructions and training shall include the following practices: i. Vehicles are clean, in good repair, suitable for the purpose, and free from odors or other conditions that may impact negatively on the agricultural input, packaging, or product; ii. Vehicles (e.g., trucks/vans/containers) are secured from tampering using a seal or other agreed-upon and acceptable device or system; iii. Unloading docks are designed to protect the product and in good operating condition (refer to 10.1.2.7); and iv. Where temperature control is required, the refrigeration unit's storage temperature settings and operating temperature are checked and recorded before opening the doors. Unloading is completed efficiently, and product temperatures are recorded at the start of unloading and at regular intervals during unloading. Recording documents for vehicle inspection, identification of approved suppliers, and temperature checks shall be maintained.

Response: Compliant

10.5.4.2 - Personnel conducting loading and transporting of harvested and/or packaged product shall ensure that product integrity is maintained. Work instructions and training shall include the following practices: i. Inspections for ensuring vehicles are clean, in good repair, suitable for the purpose, and free from odors or other conditions that may impact negatively on products; ii. Securing vehicles (e.g., trucks/vans/containers) from tampering using a seal or other agreed-upon and acceptable device or system; iii. Loading docks are designed to protect the product and in good operating condition (refer to 10.1.2.7); iv. Verification that appropriate storage conditions are maintained during transportation to final destinations; v. Prevention of cross-contamination with other hazards and potential spoilage; vi. Use of appropriate stock rotation practices; and vii. Recording and maintaining documents for vehicle inspection, transport conditions, and stock rotation.

Response: Compliant

Summary -

Response: Policy Loading, Transport and Staging Practices is documented and implemented, rev date 01/10/2025. Product rotation is FEFO, no expired products were found during the facility inspection. It is controlled via ERP implemented in the facility. The products arriving at the facility from the grower has been already pre-packed in clam shells, bags or cases. This facility owns its own trailers and delivery vehicles which are cleaned and maintained on site. Vehicles were observed to be clean during the audit. Loading docks are chilled and temperature is monitored 24 hours with alarms sent to the management in case temperature exceeds established range. Processes for loading, unloading and staging are documented. Vehicles are secured via closing doors or placing numbered sealed as per the customer specification. Temperature is monitored in transit via temperature probes installed in the vehicles and verified by person in charge. Trailer and temperature checks are performed for each inbound and outbound load. Records sighted: Inbound inspections, 02/15/2025 PO 20143171 and PO #10962538 dated 02/12/2025, PO number 00000021 dated 02/17/2025 all included trailer checks, temperature checks and temperature in transit which was appropriate for the product being transported and handled.

10.6.1 - Water Supply

10.6.1.1 - A water supply plan shall be prepared that describes the water sources and the operational areas they serve and shall include the location of water sources, permanent fixtures, and the flow of the water system. The plan shall be kept current and revised when changes occur. Contingency plans shall be in place for instances when the potable water supply is deemed to be contaminated or otherwise inappropriate for use.

Response: Compliant

10.6.1.2 - Adequate supplies of potable water drawn from a known clean source shall be provided for use during operations, cleaning the premises and equipment, and handwashing.

Response: Compliant

10.6.1.3 - Supplies of hot and cold water shall be provided, as required, to enable the effective cleaning of the premises and equipment.

Response: Compliant

10.6.1.4 - The use of non-potable water shall be controlled so that: i. There is no cross-contamination between potable and non-potable water lines; ii. Non-potable water piping and outlets are clearly identified; iii. Hoses, taps, and other similar sources of possible contamination are designed to prevent backflow or back siphonage; and iv. Testing of the backflow system, where possible, is conducted at least annually and records are maintained.

Response: N/A

Evidence: • Non-potable water is not used on site- NA (10.6.1.4)

10.6.1.5 - Where water is stored on-site, storage facilities shall be adequately designed, constructed, and routinely cleaned to prevent contamination.

Response: N/A

Evidence: • Water is not stored on site- NA (10.6.15)

Summary -

Response: Water , Ice air quality- Policy is implemented. Municipal water supply is used in this facility. Contingency plans if water becomes contaminated is on file as part of the policy. Sufficient supply of hot and cold water were observed in the facility. Provision for contingencies in case the water becomes contaminated are documented. Water is sampled and tested 1x/year by a 3rd party laboratory to ensure potability .Non-potable water is not used on site- NA (10.6.1.4); Water is not stored on site- NA (10.6.15)

10.6.2 - Water Treatment

10.6.2.1 - Water treatment methods, equipment, and materials if required, shall be designed, installed, and operated to ensure water receives effective treatment. Water treatment equipment shall be monitored regularly to ensure it remains serviceable.

Response: N/A

Evidence: • No water treatment is done in the facility- NA (10.6.2.1)

10.6.2.2 - Water used as an aid to operations (e.g., fluming, final product spray) or for cleaning and sanitizing equipment, shall be tested and, if required, treated to maintain potability (refer to 10.6.2.1).

Response: N/A

Evidence: • Water is not used to aid operations- NA (10.6.2.2)

10.6.2.3 - Treated water shall be regularly monitored to ensure it meets the specified indicators. Water treatment chemical usage shall be monitored to ensure chemical residues are within acceptable limits. Records of testing results shall be kept.

Response: N/A

Evidence: • No water treatment in the facility- NA (10.6.2.3)

Summary -

Response: No water treatment is done in the facility- NA (10.6.2.1); Water is not used to aid operations- NA (10.6.2.2); No water treatment in the facility- NA (10.6.2.3)

10.6.3 - Water Quality

10.6.3.1 - Water shall comply with local, national, or internationally recognized potable water microbiological and quality standards, as required, when used for: i. Washing, thawing, and treating food; ii. Handwashing; iii. Conveying food; iv. An ingredient or operational aid; v. Cleaning food contact surfaces and equipment; vi. The manufacture of ice; or vii. The manufacture of steam that will come into contact with food or be used to heat water that will come into contact with food.

Response: Compliant

10.6.3.2 - Microbiological analysis of the water and ice supply shall be conducted to verify the cleanliness of the supply, the monitoring activities, and the effectiveness of the treatment measures implemented. Samples for analysis shall be taken at sources supplying water for the process, cleaning, or from within the site. The frequency of analysis shall be risk-based, and at a minimum annually.

Response: Compliant

10.6.3.3 - Water and ice shall be analyzed using reference standards and methods.

Response: Compliant

Summary -

Response: Water used in the facility is tested 1x/year and analysed using approved methods by the approved 3rd party ISO certified laboratory (certificate reviewed during the audit). Ice is not used in the facility. Records sighted: COA from an approved 3rd party laboratory dated 02/21/2025

10.6.4 - Ice Supply

10.6.4.1 - Ice provided for use during operations, as a processing aid, or an ingredient shall comply with 10.5.3.1.

Response: N/A

Evidence: • Ice is not use in operations or as processing aid in this facility- NA (10.6.4.1-10.6.4.3)

10.6.4.2 - Ice that is purchased shall be from an approved supplier and included in the site's food safety risk assessment. Ice shall be supplied in containers that are appropriate for use, cleanable if reused, and be tested as appropriate (refer to 2.3.3).

Response: N/A

Evidence: • Ice is not use in operations or as processing aid in this facility- NA (10.6.4.1-10.6.4.3)

10.6.4.3 - Ice rooms and receptacles shall be constructed of materials as outlined in 10.1 and designed to minimize

contamination of the ice during storage, retrieval, and distribution.

Response: N/A

Evidence: • Ice is not use in operations or as processing aid in this facility- NA (10.6.4.1-10.6.4.3)

Summary -

Response: Ice is not use in operations or as processing aid in this facility- NA (10.6.4.1-10.6.4.3)

10.6.5 - Air and Other Gasses

10.6.5.1 - Compressed air or other gases (e.g., nitrogen or carbon dioxide) that contact food or food contact surfaces shall be clean and present no risk to food safety.

Response: N/A

Evidence: • Compressed air or gases are not used in the facility that are not already naturally producing gas (Ethylene)- NA (10.6.5.1)

10.6.5.2 - Compressed air systems and systems used to store or dispense other gases used in the operational process that come into contact with food or food contact surfaces shall be maintained and regularly monitored for quality and applicable food safety hazards. The frequency of analysis shall be risk-based and at a minimum annually.

Response: Compliant

Evidence: • Compressed air or gases are not used in the facility that are not already naturally producing gas (Ethylene)- NA (10.6.5.2)

10.6.5.3 - Ambient air shall be tested at least annually to confirm that it does not pose a risk to food safety.

Response: Compliant

Summary -

Response: Ambient air is tested 1x/year and records maintained. Records sighted: COA Ambient air testing 02/28/2025 from the approved 3rd party laboratory. Compressed air or gases are not used in the facility that are not already naturally producing gas (Ethylene)- NA (10.6.5.1-10.6.5.2)

10.7.1 - Ambient/Dry Storage

10.7.1.1 - The responsibility and methods for ensuring proper storage of inputs, packaging, and finished product shall be documented and implemented. The methods shall ensure: i. Effective stock rotation; ii. Utilization of inputs, work-in-progress, and finished product within their shelf life; iii. Risks to temporarily stored materials and/or products are analyzed, and controls are applied if necessary; iv. Rooms used for the storage of product ingredients, packaging, and other dry goods are located away from wet areas (refer to 10.1.2); and v. Records are maintained to control storage and stock rotation.

Response: Compliant

10.7.1.2 - Dry ingredients and packaging shall be received and stored separately from field product or chilled materials to ensure there is no cross-contamination. Unprocessed field products shall be received and segregated to ensure there is no cross-contamination.

Response: Compliant

10.7.1.3 - Racks provided for the storage of packaging shall be constructed of impervious materials and designed to enable cleaning and inspection of the floors and areas behind the racks. Storage areas shall be cleaned at a predetermined frequency (refer to 10.2.5.1) and designed and constructed to prevent packaging from becoming a harborage for pests or vermin.

Response: Compliant

Summary -

Response: Ambient goods are stored in good condition, were observed to be protected from contamination and are appropriately labeled. No excessive accumulation of dust or debris was observed on top of packaging. Dry ingredients and packaging are stored separately from field product or chilled materials to prevent contamination. Racks were observed to be in good condition and cleaned as per the master sanitation schedule. There are no unprocessed field products that are received in this facility. Storage areas are cleaned as per the master maintenance schedule.

10.7.2 - Cold Storage, Controlled Atmosphere Storage, and Chilling of Foods

10.7.2.1 - The site shall provide confirmation of the effective operational performance of coolers, controlled atmosphere facilities, and cool rooms. They shall be designed and constructed to allow for the hygienic and efficient refrigeration and storage of food and be easily accessible for inspection and cleaning.

Response: Compliant

10.7.2.2 - Sufficient refrigeration and controlled atmosphere capacity shall be available to chill or store the maximum anticipated throughput of products with allowance for periodic cleaning of storage rooms.

Response: Compliant

10.7.2.3 - Discharge from defrost and condensate lines shall be controlled and discharged into the drainage system.

Response: Compliant

10.7.2.4 - Cool and controlled atmosphere rooms shall be fitted with temperature and atmosphere monitoring equipment and located to monitor the warmest part of the room and fitted with measurement devices that are easily read and accessible.

Response: Compliant

Summary -

Response: Policy Receipt, storage and Handling of goods rev date 03/10/2025 is documented and implemented. The purpose of this policy is to describe the expectations for the practices applied during receiving, storage loading and transport of food at this facility. These practices are utilized to ensure the product is handled under conditions that prevent contamination. It is the responsibility of the warehouse management team to ensure this is effectively deployed. The policy includes procedures for transport (inbound) , Unloading, Storage, Loading (outbound) procedures. Goods are stored according to the food safety and the HACCP requirements in this warehouse. The order is selected according to the requirements established in the Warehouse Management system (designated item code/lot code etc). The item master is set for the first in-first out (FIFO) unless otherwise specified by the customer. The procedures includes but not limited to measuring room temperatures, measuring item temperatures at all points of handling as per the HACCP. The temperature of temperature controlled areas of the warehouse is monitored continuously and records maintained. Sufficient refrigeration capacity was observed during the audit. Discharge from

condensate is collected in an enclosed system of pipes and discharged outside the storage room in a clean drain. Records sighted: Continuous temperature monitoring records for 09/2024-12/2024. No temperature deviations have occurred.

10.8.1 - Storage of Hazardous Chemicals and Toxic Substances

10.8.1.1 - Hazardous chemicals and toxic substances with the potential for food contamination shall be stored so as not to present a hazard to personnel, product, packaging, product handling equipment, or areas in which product is handled, stored, or transported. Specifically, they shall not be stored inside food handling areas and product and packaging storage rooms.

Response: Compliant

10.8.1.2 - Daily supplies of chemicals used for continuous sanitizing of water, as a processing aid, or for emergency cleaning of food handling equipment and surfaces in food contact zones may be stored within or in close proximity to a food handling area, provided that access to the chemical storage facility is restricted to authorized personnel.

Response: Compliant

10.8.1.3 - Hazardous chemical and toxic substance storage facilities shall: i. Be compliant with national and local legislation and designed so there is no cross-contamination between chemicals; ii. Be adequately ventilated; iii. Be provided with appropriate signage indicating the area is a hazardous storage area; iv. Be secure and lockable to restrict access only to personnel with formal training in handling and use of hazardous chemicals and toxic substances; v. Have instructions, including up-to-date Safety Data Sheets (SDS), on the safe handling of hazardous chemicals and toxic substances, readily accessible to personnel; vi. Be equipped with a detailed and up-to-date inventory of all chemicals contained in the storage facility; vii. Have suitable first aid equipment and protective clothing available close to the storage area; viii. In the event of a hazardous spill, be designed such that spillage and drainage from the area is contained; and ix. Be equipped with spillage kits and cleaning equipment.

Response: Compliant

10.8.1.4 - Hazardous chemical and toxic substances shall be handled and applied by properly trained personnel. These materials shall be used by, or under the direct supervision of, trained personnel with a thorough understanding of the hazards involved, including the potential for the contamination of food and food contact surfaces.

Response: Compliant

10.8.1.5 - The site shall dispose of unused chemicals and empty containers in accordance with regulatory requirements and ensure that: i. Empty chemical containers are not reused; ii. Empty containers are labeled, isolated, and securely stored while awaiting collection; and iii. Unused and obsolete chemicals are stored under secure conditions while awaiting authorized disposal by an approved vendor.

Response: Compliant

Summary -

Response: Hazardous chemicals in this facility are observed stored in proper condition, stored in the locked chemical locker, SDS for all chemicals are available electronically. Dilutions for the floor chemicals are done as per the vendor instructions- wall mounted dilution and dispensing units were observed to be functioning properly and stored securely in the maintenance locker. Staff is trained on chemical storage and handling. Maintenance and sanitation chemicals were observed stored with authorized access only and their use is controlled by the site. Chemicals used in this warehouse are compliant with the legislation and only procured

from the approved suppliers. The chemicals were stored in the appropriately labeled containers and stored so as not to present cross-contamination among chemicals. They were stored in their original containers. Container disposal is done as per the manufacturer's instructions as per the Maintenance and the Sanitation policy, no reuse of chemical containers is allowed or was observed during the audit. Hazardous spill instructions are on file and employees have been trained on the clean up procedure. Records sighted: SDS for Bathroom spray, lubricant and de-greaser.

10.9.1 - Waste Management

10.9.1.1 - The methods and responsibilities that describe the effective and efficient disposal of dry, wet, liquid, and solid waste, including inedible material, unusable packaging, and trademarked materials, from the premises shall be documented and implemented. Reviews of the effectiveness of waste management will be part of the site's daily inspections, and the results of these inspections shall be included in the relevant reports.

Response: Compliant

10.9.1.2 - Waste shall be regularly removed from food handling or processing areas so it does not create food safety risks for finished product and packing operations. Designated waste accumulation areas shall be maintained in a clean, tidy conditions until external waste collection occurs.

Response: Compliant

10.9.1.3 - Waste and overflow water from tubs, tanks, and other equipment shall be discharged directly to the floor drainage system and meet local regulatory requirements.

Response: Compliant

10.9.1.4 - Trolleys, vehicles waste disposal equipment, collection bins, and storage areas shall be maintained in a serviceable condition and cleaned and sanitized regularly so they do not attract pests and other vermin.

Response: Compliant

10.9.1.5 - Inedible waste designated for animal feed shall be stored and handled so it does not cause a risk to the animals or to further processing.

Response: Compliant

Summary -

Response: Policy Waste Management rev 01/10/2025 is documented and implemented. It assigns responsibilities to warehouse and facility management and QA to oversee the policy. Requirements for disposing of solid and liquid waste and hazardous chemicals are on file. All industrial waste that are liquid or wet will be handled, Wet food waste is to be cleaned within the guidelines of the site Allergen Policy. Program verification is done weekly and monthly via the GDP audits conducted in this facility. No disposal of trademarked material - NA (12.8.1.4). Records sighted: Monthly GMP audit dated 04/16/2024, 07/15/2024, 09/24/2024, 10/31/2024, 12/17/2024, 02/24/2025.

12.1.1 - Premises Location and Approval

12.1.1.1 - The site shall assess local activities and the site environment to identify any risks that may have an adverse impact on product safety and implement controls for any identified risks. The assessment shall be reviewed in response to any changes in the local environment or activities. The construction and ongoing operation of the premises on the site shall be approved by the relevant authority.

Response: Compliant

Summary -

Response: Policy Premises location and approval, rev date 01/08/2025 is documented and implemented. The purpose of this policy is to outline how the site will assess their premises to identify any risks from their surroundings or local activities. The site is conducted a written risk assessment. The assessment considered the following concerns that may have an adverse impact on product safety- operations in close proximity, on site construction. The site has been registered with FDA. All necessary operational permits from state and county are on file.

12.1.2 - Building Materials

12.1.2.1 - Floors shall be constructed of smooth, dense, impact-resistant material that can be effectively graded, drained, is impervious to liquid, and easily cleaned. When drains are present in the warehouse, floors shall be sloped at gradients suitable to allow for the effective removal of all overflow or wastewater under normal working conditions.

Response: Compliant

12.1.2.2 - Drains shall be constructed and located so they can be easily cleaned and do not present a hazard. Drains if located in storage and handling areas, shall be kept clean.

Response: Compliant

12.1.2.3 - Waste trap system shall be located away from any food handling or storage area or entrance to the premises.

Response: N/A

Evidence: • No waste traps are present in the facility- NA (12.1.2.3)

12.1.2.4 - Walls, partitions, ceilings, and doors shall be of durable construction. Internal surfaces shall have an even and regular surface and be impervious with a light-colored finish and shall be kept clean (refer to 12.2.5). Wall-to-wall and wall-to-floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of food debris.

Response: Compliant

12.1.2.5 - Doors shall be of solid construction. Windows shall be made of shatterproof glass or similar material, or otherwise protected.

Response: Compliant

12.1.2.6 - Drop ceilings (where applicable) shall be constructed to enable monitoring for pest activity, facilitate cleaning, and provide access to utilities.

Response: N/A

Evidence: • No drop ceilings in the food handling and storage area- NA (12.1.2.6)

12.1.2.7 - In warehouses where food products are recouped or exposed, the product contact surfaces shall be constructed of materials that will not contribute a food safety risk

Response: Compliant

Summary -

Response: Floors , walls and ceiling were adequate and maintained in a pre-determined schedule. No Drains, waste traps or drop ceilings, surfaces and walls were cleanable as observed during the facility walk through. Doors were of solid construction and maintained on a regular basis. The facility is inspected monthly via GMP audit. Floors are sloped towards the drains and drains are cleaned weekly and were observed to be clean during the audit. Wall to floor junctions are well sealed and cleaned. No drop ceilings in the food handling and storage area- NA (12.1.2.6); No waste traps are present in the facility- NA (12.1.2.3)

12.1.3 - Lighting and Light Fittings

12.1.3.1 - Lighting in warehouses where food product is recouped or exposed shall be of appropriate intensity to enable the staff to carry out their tasks efficiently and effectively.

Response: Compliant

12.1.3.2 - Light fittings in areas where food product is recouped or exposed shall be shatterproof, manufactured with a shatterproof covering or fitted with protective covers, and recessed into or fitted flush with the ceiling.

Response: Compliant

12.1.3.3 - Light fittings in other areas of the warehouse where product is covered or otherwise protected shall be designed to prevent breakage and product contamination.

Response: Compliant

Summary -

Response: Sufficient lighting was observed in product handling, storage and inspection area.

12.1.4 - Dust, Insect, and Pest Proofing

12.1.4.1 - All external windows, ventilation openings, doors, and other openings shall be effectively sealed when closed and proofed against dust, insects, birds, and other pests. External personnel access doors shall be provided. They shall be effectively insect-proofed and fitted with a self-closing device and proper seals to protect against entry of dust, birds, and other pests.

Response: Compliant

12.1.4.2 - Electric insect control devices, pheromone, or other traps and baits shall be located and operate so as not to present a contamination risk to the product, packaging, containers, or processing equipment. Poison rodenticide bait shall not be used inside ingredient of product storage areas where ingredients, packaging, and product are handled, processed, or exposed.

Response: Compliant

Summary -

Response: Doors, windows and man doors were appropriately sealed, pest control devices observed at the manufacturing didn't present threat to the product and were installed as per the Pest Control Provider's specifications. Air curtains were in good condition and inspected regularly. Sealing around truck doors was observed to be in fair condition. No poisoned traps are used on the interior of the facility. External personnel access doors/man doors were found to be in good condition and sealed well.

12.1.5 - Ventilation

12.1.5.1 - Adequate ventilation shall be provided in enclosed storage and food handling areas.

Response: Compliant

12.1.5.2 - All ventilation equipment and devices in product storage and handling areas shall be adequately cleaned as per 12.2.5 and effectively sealed against dust, insects, and other pests as per 12.1.4.

Response: Compliant

Summary -

Response: Adequate ventilation was observed in the warehouse.

12.1.6 - Equipment and Utensils

12.1.6.1 - Specifications for equipment and utensils and procedures for purchasing equipment shall be documented and implemented.

Response: Compliant

12.1.6.2 - Equipment and utensils shall be designed, constructed, installed, operated, and maintained to meet any applicable regulatory requirements and not pose a contamination threat to products.

Response: Compliant

12.1.6.3 - Equipment storage rooms shall be designed and constructed to allow for the hygienic and efficient storage of equipment and containers. Where possible, food contact equipment shall be segregated from non-food contact equipment.

Response: Compliant

12.1.6.4 - All equipment and utensils shall be cleaned (refer to 12.2.5.1) at a frequency to control contamination and stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination.

Response: Compliant

12.1.6.5 - Vehicles used in handling areas or in cold storage rooms shall be designed, cleaned, and operated so as not to present a food safety hazard.

Response: Compliant

12.1.6.6 - In addition to the above, locations handling exposed products and recouping products on-site shall have:
i. Product contact equipment and utensils constructed of materials that are non-toxic, smooth, impervious and readily cleaned as per 12.2.5; ii. Clearly identified equipment and utensils that are used for inedible material; and
iii. Clearly identified waste and overflow handling equipment and utensils. The waste material is discharged hygienically and according to local regulatory requirements.

Response: Compliant

Summary -

Response: Utensils and containers observed during the audit were made of stainless steel (knives and box cutters), and were designed for ease of cleaning. Knife and sharps control program is implemented: knives are issued at the beginning of a shift and then turned in and inspected at the end of a shift. MHE was observed to be in clean and well maintained condition. Non-conforming equipment is locked out tagged out and logged on Non-conforming product or equipment log. Facility design is intended to prevent contamination: floors, walls, and ceilings may be adequately cleaned and kept clean and well maintained. Facility has adequate pace for

equipment and storage of materials. Separation of operations and hygienic zoning and sanitary partitions and separate airflow systems are present. Tubs/trays used to store fully packaged products are cleaned and sanitized as per the implemented SSOP, which was reviewed during the audit. That is the only equipment used to store product in this facility. Racks are cleaned regularly and inspected. The auditor reviewed SSOP for Akiro Bins (rev date 03/20/2025), Master maintenance schedule indicates that the racks are cleaned weekly including roller racks used in the facility.

12.1.7 - Grounds and Roadways

12.1.7.1 - The grounds and area surrounding the premises shall be maintained to minimize dust and kept free of waste or accumulated debris so as not to attract pests and vermin.

Response: Compliant

12.1.7.2 - Paths, roadways, and loading and unloading areas shall be maintained so as not to present a hazard to the food safety operation of the premises.

Response: Compliant

12.1.7.3 - Surroundings shall be kept neat and tidy and shall not present a hazard to the hygienic and sanitary operation of the premises or provide harborage for pests.

Response: Compliant

Summary -

Response: Grounds and roadways, parking lots and dock areas were observed in good condition and maintained to prevent contamination.

12.2.1 - Repairs and Maintenance

12.2.1.1 - The methods and responsibility for the maintenance and repair of facility, equipment, and buildings shall be documented, planned, and implemented in a manner that minimizes the risk of product, packaging, or equipment contamination.

Response: Compliant

12.2.1.2 - The maintenance schedule shall be prepared to cover building, equipment, and other areas of the premises critical to the maintenance of product safety. Routine maintenance of plant and equipment in any food handling or storage area shall be performed according to a maintenance control schedule and recorded.

Response: Compliant

12.2.1.3 - Failures of facility and equipment in any food storage and handling area shall be documented, reviewed, and necessary repair incorporated into the maintenance control schedule.

Response: Compliant

12.2.1.4 - Site supervisors shall be notified when maintenance or repairs are to be undertaken in any food handling or storage area.

Response: Compliant

12.2.1.5 - The maintenance supervisor and the site supervisor shall be informed if any repairs or maintenance pose a potential threat to product safety (e.g., pieces of electrical wire, damaged light fittings, and loose overhead

fittings). When possible, maintenance is to be conducted outside operating times.

Response: Compliant

12.2.1.6 - Temporary repairs, where required, shall not pose a food safety risk and shall be included in the cleaning program. There shall be a plan in place to address completion of temporary repairs to ensure they do not become permanent solutions.

Response: Compliant

12.2.1.7 - Equipment located over exposed product shall be lubricated with food grade lubricants and their use controlled to minimize the contamination of the product.

Response: N/A

Evidence: • No equipment is located over exposed product or product conveyors- NA (10.2.2.4).

12.2.1.8 - Paint used in a food handling or contact zone shall be suitable for use, in good condition (i.e., no chips), and shall not be used on any product contact surface.

Response: Compliant

Summary -

Response: Repairs and Maintenance policy rev date 01/09/2025 is documented and implemented. Master maintenance schedule (Maintenance Control schedule) that includes building materials, doors, racking and equipment is established and was verified to be maintained during the audit via interviews and reviewing PM's. which is consistent with manufacturer's instructions for the equipment. Equipment failures or area restrictions are recorded in Non-conforming product/equipment/area log. QA is notified when the repairs are performed. Maintenance is done via 3rd party providers, there is no in- house maintenance crew. Provision for temporary repairs is documented- no evidence of temporary repairs was observed during the facility tour. Maintenance staff and contractors are required to remove all tools and debris from any maintenance activity once its been completed and inform the Quality and production so that the cleaning and inspection can be completed. No paint used in the production zone. No equipment is located over exposed product or product conveyors- NA (10.2.2.4). Records sighted: Maintenance control schedule which includes frequency, task, priority, hours of service, checklists for condensing units maintenance, records of condensing units cleaning dated 03/22/2024, 06/11/2024, 03/25/2024, evaporators cleaning for 2024 with frequency of cleaning which is dependent on the area of the facility. Master maintenance schedule for Banana rooms was reviewed during the audit, with service interval of 3 months for all equipment (filters) located in this area, repack maintenance and cleaning (evaporators are cleaned quarterly). Corrective action dated 02/28/2025 (issue with compressor variance, which was slight and didn't affect product safety). Verified and completed 03/07/2025.

12.2.2 - Maintenance Staff and Contractors

12.2.2.1 - Maintenance staff and contractors shall comply with the site's personnel and process hygiene requirements (refer to 12.3).

Response: Compliant

12.2.2.2 - All maintenance staff and contractors required to work on-site shall be trained in the site's food safety and hygiene procedures or shall be escorted at all times until their work is completed. Records of training shall be documented and retrievable.

Response: Compliant

12.2.2.3 - Maintenance staff and contractors shall remove all tools and debris from any maintenance activity once it has been completed and inform the area supervisor and maintenance supervisor so that appropriate hygiene and sanitation can be completed and an inspection conducted prior to restarting site operations. The inspections shall be documented.

Response: Compliant

Summary -

Response: Contractors working on the facility extensions are trained on GMP procedure upon arrival and are always escorted during their visit to ensure compliance. Maintenance staff and contractors are required to remove all tools and debris from any maintenance activity once its been completed and inform the Quality and production so that the cleaning and inspection can be completed. Records sighted: GMP training for visitors, contractors and maintenance for a fork lift maintenance provider dated 01/08/2025.

12.2.3 - Calibration

12.2.3.1 - The methods and responsibility for calibration and re-calibration of measuring, testing, and inspection equipment used for monitoring activities outlined in prerequisite programs, food safety plans, and other process controls, or to demonstrate compliance with customer specifications, shall be documented and implemented. Software used for such activities shall be validated and secured as appropriate.

Response: Compliant

12.2.3.2 - Equipment shall be calibrated against national or international reference standards and methods or to an accuracy appropriate to its use. In cases where standards are not available, the site shall provide evidence to support the calibration reference method applied. A list of measuring, testing, and inspection equipment requiring calibration shall be maintained.

Response: Compliant

12.2.3.3 - Calibration shall be performed according to regulatory requirements and/or to the equipment manufacturers' recommended schedule.

Response: Compliant

12.2.3.4 - Procedures shall be documented and implemented to address the disposition of potentially affected products should measuring, testing, and inspection equipment be found to be out of calibration state.

Response: Compliant

12.2.3.5 - A directory of measuring, testing, and inspection equipment requiring calibration and records of calibration tests shall be maintained.

Response: Compliant

Summary -

Response: Policy Calibration is established and implemented, SQFP or substitute oversee the program. Directory of calibration equipment is on file along with frequency, responsibility and verification. Instructions for product potentially affected by out of calibration equipment is documented. Equipment is calibrated against NIST. Records of calibration activities are retained. Scales are calibrated annually, ATP luminometer is calibrated monthly, thermometers are calibrated weekly, Infrared Guns are calibrated daily, EV units are calibrated annually and Clean and Sanitizer dilution checks are recorded and calibrated weekly. Records sighted: Quality Control Weekly Temperature probe worksheet, for 2024 (54 weeks) and 13 first week of 2025,

NIST certification Asset #Q018947, dated 03/10/2025 for the pocket thermistor, Annual scale calibration for scale serial number EQ 1931129 dated 03/19/2025 and EQ 1931134 dated 03/19/2025. Calibration for luminometer, ATP calibration log dated 1/26/2024, 06/05/2024, 08/06/2024, 12/2/2024 (calibrated monthly as per the established policy).

12.2.4 - Pest Prevention

12.2.4.1 - A documented pest prevention program shall be effectively implemented. It shall: i. Describe the methods and responsibility for the development, implementation, and maintenance of the pest prevention program; ii. Record pest sightings and trend the frequency of pest activity to target pesticide applications; iii. Outline the methods used to prevent pest problems; iv. Outline the pest elimination methods and the appropriate documentation for each inspection; v. Outline the frequency with which pest status is to be checked; vi. Include on a site map the identification, location, number, and type of applied pest control/ monitoring devices; vii. List the chemicals used. They are required to be approved by the relevant authority and their Safety Data Sheets (SDS) made available; viii. Outline the methods used to make staff aware of the bait control program and the measures required when they come into contact with a bait station; ix. Outline the requirements for staff awareness and training in the use of pest and vermin control chemicals and baits; and x. Measure the effectiveness of the program to verify the elimination of applicable pests and identify trends.

Response: Compliant

12.2.4.2 - Pest contractors and/or internal pest controllers shall: i. Be licensed and approved by the local relevant authority; ii. Use only trained and qualified operators who comply with regulatory requirements; iii. Use only approved chemicals; iv. Provide a pest prevention plan (refer to 12.2.4.1), which includes a site map indicating the location of bait stations traps and other applicable pest control/monitoring devices; v. Report to a responsible authorized person on entering the premises and after the completion of inspections or treatments; vi. Provide regular inspections for pest activity with appropriate action taken if pests are present, and vii. Provide a written report of their findings and the inspections and treatments applied.

Response: Compliant

12.2.4.3 - Pest activity risks shall be analyzed and recorded. Inspections for pest activity shall be undertaken on a regular basis by trained site personnel and the appropriate action taken if pests are present. Identified pest activity shall not present a risk of contamination to food products, raw materials, or packaging. Records of all pest control inspections and applications shall be maintained.

Response: Compliant

12.2.4.4 - Food products, raw materials, or packaging that are found to be contaminated by pest activity shall be effectively disposed of and the source of pest infestation investigated and resolved. Records shall be kept of the disposal, investigation, and resolution.

Response: Compliant

12.2.4.5 - Pesticides shall be clearly labeled and stored per 12.6.4 if kept on-site.

Response: N/A

Evidence: • Pesticides are not kept on site- NA (12.2.4.5)

12.2.4.6 - No animals shall be permitted on-site in food handling or storage areas.

Response: Compliant

Summary -

Response: Pest control program Document # is documented and implemented. The purpose of the policy is to describe the integrated pest management process to ensure that the warehouse and surrounding areas are managed so as not to attract pests or vermin. It is the responsibility of the site's Quality department working through a contracted approved 3rd party PCO to deploy these requirements. . The site maintained current business license, current pest control licenses for all operators/technicians, that service the site, a list of approved chemicals to be used and their SSDS, a facility map showing the location, number and type of every pest device (including temporary placements of the pest monitoring devices for short term monitoring). Records/reports of at least the last 12 months of inspections, including pest sightings, treatments and observations/recommendations and the corrective actions taken as needed. Toxic bait is to be used in the exterior devices only. on the interior of both the facility and the warehouse only glue traps or other mechanical traps are used. All devices are approved devices by the PCO Frequency of inspections is required to be minimally 1x/week or more often as needed for each individual facility. All findings must be addressed by the site management. Exterior area adjacent to the building including but not limited to weeds, grass, storage of equipment must be done to minimize the potential for east harborage. Pest management must be included in the general new hire orientation. Disposition for products potentially affected by the pest activity is that they should be effectively disposed of/destroyed. Pest activity shall be trended at least quarterly to verify the elimination of applicable pests and the entire plan must be reviewed at least annually during management review meetings. This facility doesn't store any pesticides on premises- NA (12.2.4.5). Records sighted: Business License of PCO issued by the state of CA expiring 12/31/2025, Pest control business license #32478 expiration date 12/31/2026, applicator license expiration date 06/30/2025, 02/11/2025, service reports dated 08/13/2024, 08/21/2024, , 08/27/2024, 09/04/2024, 10/08/2024, 10/22/2024, 11/19/2024, 12/24/2924. Trend report for 2024 was on file and reviewed.

12.2.5 - Cleaning and Sanitation

12.2.5.1 - The methods and responsibility for the effective cleaning of the food storage and handling areas, staff amenities, and toilet facilities shall be documented and implemented. Consideration shall be given to: i.What is to be cleaned; ii.How it is to be cleaned; iii.When it is to be cleaned; iv.Who is responsible for cleaning; v.Validation of cleaning procedures; vi.Methods used to confirm the correct concentrations of detergents and sanitizers, and vii.The responsibility and methods used to verify the effectiveness of the cleaning and sanitation program.

Response: Compliant

12.2.5.2 - Detergents and sanitizers shall be suitable for use in a food and storage and handling environment, labeled according to regulatory requirements, and purchased in accordance with applicable legislation. The organization shall ensure: i.The site maintains a list of chemicals approved for use; ii.An inventory of all chemicals purchased and used is maintained; iii.Detergents and sanitizers are stored as outlined in element 12.6.4; iv.Safety Data Sheets (SDS) are provided for all detergents and sanitizers purchased; and v.Only trained staff handle sanitizers and detergents.

Response: Compliant

12.2.5.3 - Detergents and sanitizers that have been mixed for use shall be correctly mixed according to manufacturers' instructions, stored in containers that are suitable for use, and clearly identified. Mix concentrations shall be verified and records maintained.

Response: Compliant

12.2.5.4 - Provision shall be made for the effective cleaning of equipment, utensils, and protective clothing.

Response: Compliant

12.2.5.5 - Cleaning equipment, tools, racks, and other items used in support of the cleaning and sanitizing program shall be clearly identified, stored, and maintained in a manner that prevents contamination of processing, product handling equipment, and storage areas as well as the tools themselves.

Response: Compliant

12.2.5.6 - Staff amenities, sanitary facilities, and other essential areas shall be inspected by qualified personnel to ensure the areas are clean and at a defined frequency.

Response: Compliant

12.2.5.7 - Records of cleaning and sanitation activities, verification, and inspections shall be maintained.

Response: Compliant

12.2.5.8 - Staff amenities, sanitary facilities, and other essential areas shall be inspected by qualified personnel at a defined frequency to ensure the areas are clean.

Response: Compliant

Summary -

Response: Cleaning and Sanitation policy rev date 01/10/2025 is documented and implemented. Master sanitation schedule is established and current. The entire facility and grounds are in scope of the schedule. Sanitation is performed by trained 3rd party provider. FSQA Supervisor/SQFP oversees the program. All food surface contact areas in the repack room are to be cleaned and sanitized with the approved sanitizer. The sanitizer is verified monthly with a sanitizing strip. SDS for the quat based sanitizer was reviewed during the audit. Pre- operational inspections are conducted by the person responsible for the repack area. Cleanliness is verified via ATP swabs and the implemented EMP program. SSOP for Akiro Bins (rev date 03/20/2025) and for the rolling racks and drain cleaning have been reviewed during the audit. Dr Master maintenance schedule indicates that the racks are cleaned weekly including roller racks used in the facility. Records sighted: Weekly dilution testing results for January- December 2024 (weekly checks). Pre-operational ATP verifications log "Repack cleaning Schedule for 1/1/2025-1/29/2025). Sanitation schedule included drain cleaning records (done at least weekly or more often as need) and records maintained.

12.3.1 - Personnel Welfare

12.3.1.1 - Personnel suffering from infectious diseases or who are carriers of any infectious disease shall be restricted from working on the site or in the transportation of food and shall not engage in food handling operations or be permitted access to storage areas where the product is exposed or there is a risk of contamination of food.

Response: Compliant

12.3.1.2 - The site shall have measures in place to prevent contact of materials, ingredients, food packaging, food, or food contact surfaces from any bodily fluids from open wounds, coughing, sneezing, spitting, or any other means. In the event of an injury that causes spillage of bodily fluid, a properly trained staff member shall ensure that all affected areas, including handling and storage areas, have been adequately cleaned and that all materials and products have been quarantined and/or disposed of.

Response: Compliant

12.3.1.3 - Personnel with exposed cuts, sores, or lesions shall not engage in handling exposed products, recoup, repack or processing products, or handling primary packaging or food contact surfaces. Minor cuts or abrasions on exposed parts of the body shall be covered with a protective bandage or alternative suitable dressing. A colored bandage or alternative suitable waterproof and colored dressing is recommended for handling exposed products, recoup, or repack processes.

Response: Compliant

Summary -

Response: Personal welfare policy is documented and implemented. The procedure includes but is not limited to employee requirements with contagious diseases or illnesses, visitors and contractor's requirements and break areas and restroom requirements and clean up procedure. Personnel with exposed cuts, sores or lesions are prohibited from accessible borne pathogens spill kits are present and training on the program is conducted on an annual basis. No ill employees, open wounds or any other risk of contamination was observed during the facility walk through.

12.3.2 - Handwashing

12.3.2.1 - All personnel shall have clean hands and hands shall be washed by all staff, contractors, and visitors: i.On entering food handling, storage, and processing areas; ii.After each visit to a toilet; iii.After using a handkerchief; iv.After smoking, eating, or drinking; and v.After sneezing or coughing.

Response: Compliant

12.3.2.2 - Handwash stations shall be available and accessible as required.

Response: Compliant

12.3.2.3 - Handwash stations shall be constructed of stainless steel or similar non-corrosive material and at a minimum supplied with: i.A potable water supply at an appropriate temperature; ii.Liquid soap; iii.Paper towels; and iv.A means of containing used paper towels. An effective hand dryer may be used in instances where there is no direct hand contact of food or food contact surfaces.

Response: Compliant

12.3.2.4 - Signage in appropriate languages instructing people to wash their hands shall be provided in a prominent position.

Response: Compliant

12.3.2.5 - When gloves are used, personnel shall maintain the handwashing practices outlined above.

Response: Compliant

Summary -

Response: Policy Handwashing, rev date 01/10/2025 is documented and implemented. It addresses hand washing requirements in this facility. Good handwashing practices were observed on site. Handwashing stations were present in the restrooms located throughout the facility and were observed to be in good condition and stocked with all essentials (hot water, soap, sanitizer, paper towels and GMP signage).

12.3.3 - Clothing and Personal Effects

12.3.3.1 - Clothing worn by staff engaged in handling food shall be maintained, stored, laundered, and worn so as

not to present a contamination risk to products.

Response: Compliant

12.3.3.2 - Clothing, including shoes, shall be clean at the commencement of each shift and maintained in a serviceable condition.

Response: Compliant

12.3.3.3 - Protective clothing shall be manufactured from material that will not pose a food safety threat and is easily cleaned.

Response: Compliant

12.3.3.4 - Jewelry and other loose objects shall not be worn or taken into a food handling or processing operation or any area where food is exposed. The wearing of plain bands with no stones, prescribed medical alert bracelets, or jewelry accepted for religious or cultural reasons can be permitted, provided it is properly covered and does not pose a food safety risk. All exceptions shall meet regulatory and customer requirements and shall be subject to a risk assessment and evidence of ongoing risk management.

Response: Compliant

Summary -

Response: Protective clothing is observed in to be in good condition, protective clothing is used in the re-pack area, gloves of various sizes used in the facility are available to employees that work in the repack area. Disposable aprons are not used. The protective clothing is stored and cleaned to ensure protect contamination.

12.3.4 - Visitors

12.3.4.1 - All visitors shall be required to comply with all Good Storage and Distribution Practices and hygiene standards required by the site, including those applying to clothing and personal effects, hand-washing, and illness (refer to 12.3.1, 12.3.2 and 12.3.3).

Response: Compliant

12.3.4.2 - All visitors, including management staff, shall wear suitable clothing and footwear when entering any food storage and handling area.

Response: Compliant

12.3.4.3 - Visitors exhibiting visible signs of illness shall be prevented from entering areas in which food is handled or processed (refer to 12.3.1).

Response: Compliant

12.3.4.4 - Visitors shall enter and exit food handling areas through the proper staff entrance points and comply with all handwashing and personnel practice requirements.

Response: Compliant

12.3.4.5 - All visitors shall be trained in the site's food safety and hygiene procedures before entering any food processing or handling areas or shall be escorted at all times in food handling and storage areas.

Response: Compliant

12.3.4.6 - The site shall have a documented procedure for how driver access is managed to minimize food safety risk and designated driver areas are maintained to prevent food contamination or other food safety risks.

Response: Compliant

Summary -

Response: Visitor and Contractor policy is documented and implemented. Contractor Safety briefing is documented. Visitors are required to be identified at arrival, briefed on the GDP and safety measures implemented on site, visitors that are exhibiting signs of illness are not permitted to enter the site, Drivers are not allowed get past a certain point in the warehouse typically beyond drivers lounge as per the documented and implemented shipping/receiving and visitor's policy as well as Food Defense policy implemented in this warehouse.

12.3.5 - Staff Amenities (change rooms, toilets, break rooms)

12.3.5.1 - Staff amenities shall have documented cleaning procedures, be supplied with appropriate lighting and ventilation, and shall be made available for the use of all persons engaged in the handling and processing of product.

Response: Compliant

12.3.5.2 - Provision shall be made for staff to store their street clothing and personal items separate from food contact zones and food storage areas.

Response: Compliant

12.3.5.3 - Toilet rooms shall be: i.Designed and constructed so that they are accessible to staff and separate from any food handling operations; ii.Accessed from the warehouse or food handling area via an airlock vented to the exterior or through an adjoining room; iii.Sufficient in number for the maximum number of staff; iv.Constructed so that they can be easily cleaned and maintained; and v.Kept clean and tidy.

Response: Compliant

12.3.5.4 - Sanitary drainage shall not be connected to any other drains within the premises and shall be directed to a septic tank or a sewerage system. Procedure shall be documented and implemented to properly manage sewage back-ups to minimize the potential for contamination.

Response: Compliant

12.3.5.5 - Handwash basins shall be provided immediately outside or inside the toilet room and designed as outlined in 12.3.2.2.

Response: Compliant

12.3.5.6 - Separate break room facilities shall be provided away from a food handling or storage areas. Break rooms shall be kept clean and tidy and free from waste materials and pests.

Response: Compliant

12.3.5.7 - Where outside eating areas are provided, they shall be kept clean and free from waste materials and maintained in a manner that minimizes the potential for introduction of contamination including pests to the site.

Response: Compliant

12.3.5.8 - Signage in languages understood by staff advising people to wash their hands before entering the food

storage areas shall be provided in a prominent position in break rooms and break room exits.

Response: Compliant

Summary -

Response: SSOPs for staff amenities are documented and implemented. Staff amenities are adequate. Change rooms and locker rooms provided are adequate. Sanitary facilities are adequate. Lunchrooms were equipped with all essentials for safe food storage, handwashing, trashcans and GMP signage in English (language spoken in the facility). The sewage back up procedures is outlined in the Personnel Hygiene, Disease Control, GDP's/GMP's visitors, Employee Welfare Areas policy. Practices observed during the audit were in compliance with the policy

12.4.1 - Personnel Processing Practices

12.4.1.1 - All personnel shall comply with the following practices: i.Personnel entry to food handling areas shall be through the personnel access doors only; ii.All doors are to be kept closed. Doors shall not be left open for extended periods when access is required for waste removal or stock transfer; iii.The wearing of false fingernails or fingernail polish is not permitted when handling exposed food; iv.Materials and products shall be kept in appropriate containers as required and off the floor; v.Waste shall be contained in the bins identified for this purpose and removed from the operational area on a regular basis and not left to accumulate; vi.Staff shall not eat or taste any product in the food storage or handling area; vii.Smoking, chewing, eating, or spitting is not permitted in any food handling or storage areas; and viii.Drinking of water is permissible only under conditions that prevent contamination or other food safety risks from occurring. Drinking water containers shall be stored in clear, covered containers, and used in designated areas only. Code Amendment #1 A medical screening procedure shall be in place for all employees, visitors and contractors who handle exposed product or food contact surfaces.

Response: Compliant

12.4.1.2 - All personnel engaged in storage, transport, and handling of packaged products and materials shall ensure that products and materials are handled and stored in such a way as to prevent damage or product contamination.

Response: Compliant

Summary -

Response: Good personnel processing practices were observed during the audit. Practices were compliant with requirements of the implemented GDP. There is no exposed food in the facility. Waste was taken out at the regular intervals, no evidence of eating or drinking was observed in the facility. Medical screening procedure is documented for all employees coming back to work from an illness. Visitors and contractors are screened for any signs of disease visually and are required to acknowledge the implemented GDP policy. Water in clear plastic containers is allowed in the dock area as per the policy. GDP Monthly audits are performed to verify compliance. Records sighted: Monthly GMP audit dated 04/16/2024, 07/15/2024, 09/24/2024, 10/31/2024, 12/17/2024, 02/24/2025.

12.5.1 - Water Supply

12.5.1.1 - Adequate supplies of water drawn from a known clean source shall be provided for use during holding, storage and cleaning of the premises and equipment.

Response: Compliant

12.5.1.2 - Contingency plans shall be in place for instances when the potable water supply is deemed to be contaminated or otherwise inappropriate for use.

Response: Compliant

12.5.1.3 - Supplies of hot and cold water shall be provided as required to enable the effective cleaning of the premises and equipment.

Response: Compliant

12.5.1.4 - The delivery of water within the premises shall ensure potable water is not contaminated. Testing of the backflow system, where possible, shall be conducted at least annually and records shall be maintained.

Response: Compliant

12.5.1.5 - The use of non-potable water shall be controlled such that: i. There is no cross-contamination between potable and non-potable water lines; ii. Non-potable water piping and outlets are clearly identified; and iii. Hoses, taps, and other similar sources of possible contamination are designed to prevent back flow or back siphonage.

Response: N/A

Evidence: • Non- potable water is not used on site- NA (12.5.1.5)

12.5.1.6 - Where water is stored on-site, storage facilities shall be adequately designed, constructed, and routinely cleaned to prevent contamination.

Response: N/A

Evidence: • Water is not stored on site- NA (12.5.1.6)

Summary -

Response: Water , Ice air quality- Policy is implemented. Municipal water supply is used in this facility. Contingency plans if water becomes contaminated is on file as part of the policy. Sufficient supply of hot and cold water were observed in the facility. Water is not stored on site- NA (12.5.1.6); Non- potable water is not used on site- NA (12.5.1.5)

12.5.2 - Water and Ice Quality

12.5.2.1 - Microbiological analysis of the water and ice supply that comes into contact with food or food contact surfaces shall be conducted to verify the cleanliness of the supply, the monitoring activities, and the effectiveness of the treatment measures implemented. Verification, at minimum, shall be made annually.

Response: Compliant

12.5.2.2 - Water and ice shall be analyzed using reference standards and methods.

Response: Compliant

12.5.2.3 - Ice rooms and receptacles shall be constructed of materials as outlined in elements 12.1.2 and designed to minimize contamination of the ice during storage and distribution.

Response: N/A

Evidence: • Ice is not generated or used on site- NA (12.5.2.3)

Summary -

Response: Water used in the facility is tested 1x/year and analysed using approved methods by the approved

3rd party ISO certified laboratory (certificate reviewed during the audit). Ice is not used in the facility. Records sighted: COA from an approved 3rd party laboratory dated 02/21/2025 Ice is not generated or used on site- NA (12.5.2.3)

12.5.3 - Air and Other Gases

12.5.3.1 - Compressed air or other gases (e.g. nitrogen, carbon dioxide) that contact food or food contact surfaces shall be clean and present no risk to food safety.

Response: N/A

Evidence: • Compressed air or gases are not used on site- NA (12.5.3.1- 12.5.3.2)

12.5.3.2 - Compressed air systems and systems used to store or dispense other gases used in food storage and distribution process shall be maintained and regularly monitored for quality and applicable food safety hazards.

Response: N/A

Evidence: • Compressed air or gases are not used on site- NA (12.5.3.1- 12.5.3.2)

Summary -

Response: Compressed air or gases are not used on site- NA (12.5.3.1- 12.5.3.2)

12.6.1 - Receipt, Storage and Handling of Goods

12.6.1.1 - The site shall implement an effective storage plan that allows for the safe, hygienic storage of ice, food products (frozen, chilled, and ambient), packaging, equipment, and chemicals.

Response: Compliant

12.6.1.2 - Dry food products shall be received and stored in a way to prevent cross-contamination with frozen and chilled products.

Response: Compliant

12.6.1.3 - The responsibility and methods for ensuring effective stock rotation principles are applied shall be documented and implemented.

Response: Compliant

12.6.1.4 - Procedures shall be in place to ensure that all food products and recouped products are utilized within their designated shelf life.

Response: Compliant

12.6.1.5 - Where goods are held under temporary or overflow conditions that are not designed for the safe storage of goods, a risk analysis shall be undertaken to ensure there is no risk to the integrity of those goods, or contamination, or adverse effects on food safety.

Response: N/A

Evidence: • No temporary or overflow conditions- NA (12.6.1.5 and 12.6.1.6)

12.6.1.6 - Records shall be available to verify alternate or temporary control measures for storage of raw materials, ingredients, packaging, equipment, chemicals, or finished products.

Response: N/A

Evidence: • No temporary or overflow conditions- NA (12.6.1.5 and 12.6.1.6)

12.6.1.7 - Racks provided for the storage of food products shall be constructed of impervious materials and designed to enable cleaning of the floors and the storage room. Storage areas shall be cleaned at a predetermined frequency.

Response: Compliant

Summary -

Response: Policy Receipt, storage and Handling of goods rev date 03/10/2025 is documented and implemented. The purpose of this policy is to describe the expectations for the practices applied during receiving, storage loading and transport of food at this facility. These practices are utilized to ensure the product is handled under conditions that prevent contamination. It is the responsibility of the warehouse management team to ensure this is effectively deployed. The policy includes procedures for transport (inbound) , Unloading, Storage, Loading (outbound) procedures. Goods are stored according to the food safety and the HACCP requirements in this warehouse. The order is selected according to the requirements established in the Warehouse Management system (designated item code/lot code etc). The item master is set for the first in-first out (FIFO) unless otherwise specified by the customer. The procedures includes but not limited to measuring room temperatures, measuring item temperatures at all points of handling as per the HACCP. The temperature of temperature controlled areas of the warehouse is monitored continuously and records maintained. Sufficient refrigeration capacity was observed during the audit. Discharge from condensate is collected in an enclosed system of pipes and discharged outside the storage room in a clean drain.

12.6.2 - Cold Storage, Freezing and Chilling of Foods

12.6.2.1 - The site shall provide confirmation of the effective operational performance of freezing, chilling, and cold storage facilities. Chillers, blast freezers, and cold storage rooms shall be designed and constructed to allow for the hygienic and efficient refrigeration of food and shall be easily accessible for inspection and cleaning.

Response: Compliant

12.6.2.2 - Sufficient refrigeration capacity shall be available to store chilled or frozen food at the maximum anticipated throughput of product with allowance for periodic cleaning of refrigerated areas.

Response: Compliant

12.6.2.3 - Discharge from defrost and condensate lines shall be controlled and discharged to the drainage system.

Response: Compliant

12.6.2.4 - The site shall have a written procedure for monitoring temperatures of storage rooms, including the frequency of checks, and corrective actions if the temperature is out of specification. Cold and chilled storage rooms shall be fitted with temperature monitoring equipment, located to monitor the warmest part of the room, and be fitted with a temperature measurement device that is easily readable and accessible. Records shall be kept of frozen, cold, and chilled storage room temperatures.

Response: Compliant

12.6.2.5 - Procedures shall be in place to identify the methods and responsibilities used to ensure that processes applied to materials prior to distribution (e.g. thawing, slacking, labeling) do not pose a risk to product safety or loss of traceability.

Response: Compliant

Summary -

Response: Storage policy is implemented. The objective is to define this warehouse's requirements for ensuring products are received, stored and shipped in the appropriate temperature ranges. To define policy requirements for ensuring the accuracy of temperature measuring devices used in these processes. Out of Limits temperature escalation policy is documented and outlines action in case of the temperature deviation. Storage rooms are designed for hygienic product storage Discharge from the condensate is collected in specifically designated enclosed water pipe and discarded- no evidence of discharge from condensate was observed during the audit Sufficient refrigeration capacity was observed in the warehouse as per the audit inspection observations. The storage rooms are equipped with wall mounted temperature probes which are used for 24 hour monitoring. Records sighted: continuous monitoring records for 09/2024-12/2024. No temperature deviations or negative trends occurred in the past 1 year.

12.6.3 - Storage of Dry Goods

12.6.3.1 - Dry goods shall be located away from wet areas to protect the product from contamination and deterioration and to prevent packaging from becoming a harborage for pests or vermin.

Response: Compliant

Summary -

Response: Dry goods are stored in good condition and protected from contamination

12.6.4 - Storage of Hazardous Chemicals and Toxic Substances Used On-site

12.6.4.1 - Hazardous chemicals, toxic substances, and pesticides that are for use on the site with the potential for food contamination shall be: i.Used only according to manufacturers' instructions; ii.Controlled to prevent contamination or a food safety hazard to raw material, packaging, work-in-progress, finished product, or product contact surfaces; iii.Included in a current register of all hazardous chemicals and toxic substances that are stored on-site; iv.Supplemented with a current Safety Data Sheet (SDS) made available to all staff; v.Controlled to track usage and ensure return to the appropriate storage areas after use; vi.Be compliant with national and local legislation; and vii.Used so that there is no cross-contamination between chemicals.

Response: Compliant

12.6.4.2 - Hazardous chemicals and toxic substances shall be stored: i.In an area with appropriate signage; ii.Accessible only by personnel trained in the storage and use of chemicals; iii.Separated from the distribution storage area so as not to present a hazard to staff, product, packaging, or product handling equipment; iv.In their original containers, or in clearly labeled secondary containers if allowed by applicable legislation; and v.Stored so that there is no cross-contamination between chemicals.

Response: Compliant

12.6.4.3 - Personnel who handle hazardous chemicals and toxic substances, including pesticides and cleaning chemicals: i.Shall be fully trained in their purpose, storage, handling, and use; ii.Be provided first aid equipment and personnel protective equipment; and iii.Ensure compliance with the proper identification, storage, usage, disposal, and clean-up requirements.

Response: Compliant

12.6.4.4 - The site shall dispose of unused chemicals and empty containers in accordance with regulatory requirements and ensure that: i.Empty chemical containers are not reused; ii.Empty containers are labeled, isolated, and securely stored while awaiting collection; and iii.Unused and obsolete chemicals are stored under secure conditions while waiting authorized disposal by an approved vendor.

Response: Compliant

12.6.4.5 - In the event of a hazardous spill, the site shall: i.Have spillage clean-up instructions to ensure that the spill is properly contained; and ii.Be equipped with spillage kits and cleaning equipment.

Response: Compliant

Summary -

Response: Hazardous chemicals in this facility are observed stored in proper condition, stored in the locked chemical locker, SDS for all chemicals are available electronically. Dilutions for the floor chemicals are done as per the vendor instructions- wall mounted dilution and dispensing units were observed to be functioning properly and stored securely in the maintenance locker. Staff is trained on chemical storage and handling. Maintenance and sanitation chemicals were observed stored with authorized access only and their use is controlled by the site. Chemicals used in this warehouse are compliant with the legislation and only procured from the approve suppliers. The chemicals were stored in the appropriately labeled containers and stored so as not to present cross-contamination among chemicals. They were stored in their original containers. Container disposal is done as per the manufacturer's instructions as per the Maintenance and the Sanitation policy, no reuse of chemical containers is allowed or was observed during the audit. Hazardous spill instructions are on file and employees have bee trained on the clean up procedure. Records sighted: SDS for Bathroom spray, lubricant and de-greaser.

12.6.5 - Loading, Transport, and Staging Practices

12.6.5.1 - The practices applied during loading, transport, and unloading of food products and materials shall be documented, implemented, and designed to maintain appropriate storage conditions and product integrity. Practices shall protect against contamination from biological, chemical, and physical hazards, and under conditions that prevent cross-contamination.

Response: Compliant

12.6.5.2 - Sites shall have a procedure in place that is documented and implemented to ensure trailers are inspected prior to receiving shipments or loading to ensure that the trailer is in good repair, clean, secured and at the required environmental condition and temperature.

Response: Compliant

12.6.5.3 - Vehicles (e.g. trucks/vans/containers) used for transporting food shall be inspected prior to loading to ensure they are clean, in good repair, suitable for the purpose, and free from odors or other conditions that may impact negatively on the product.

Response: Compliant

12.6.5.4 - Receiving, staging, loading, and unloading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining product integrity.

Response: Compliant

12.6.5.5 - Where applicable, food transport vehicles' refrigeration units shall maintain the food at the required

temperatures and the units' temperature settings shall be set, checked, and recorded before loading and product temperatures monitored at regular intervals during loading as appropriate. The refrigeration units shall be operational at all times and checks shall be completed of the units' operation, the door seals, and the storage temperature at regular intervals during transit.

Response: Compliant

12.6.5.6 - Upon arrival and prior to opening the doors, the food transport vehicles' refrigeration unit storage temperature settings and operating temperature shall be checked and recorded. Receiving shall be completed efficiently and product temperatures shall be recorded at the commencement of unloading and at regular intervals during unloading.

Response: Compliant

Summary -

Response: Policy Loading, Transport and Staging Practices is documented and implemented, rev date 01/10/2025. Product rotation is FEFO, no expired products were found during the facility inspection. It is controlled via ERP implemented in the facility. The products arriving at the facility from the grower has been already pre-packed in clam shells, bags or cases. This facility owns its own trailers and delivery vehicles which are cleaned and maintained on site. Vehicles were observed to be clean during the audit. Loading docks are chilled and temperature is monitored 24 hours with alarms sent to the management in case temperature exceeds established range. Processes for loading, unloading and staging are documented. Vehicles are secured via closing doors or placing numbered sealed as per the customer specification. Temperature is monitored in transit via temperature probes installed in the vehicles and verified by person in charge. Trailer and temperature checks are performed for each inbound and outbound load. Records sighted: Inbound inspections, 02/15/2025 PO 20143171 and PO #10962538 dated 02/12/2025, PO number 00000021 dated 02/17/2025 all included trailer checks, temperature checks and temperature in transit which was appropriate for the product being transported and handled.

12.7.1 - Process Flow

12.7.1.1 - The process flow shall be designed to prevent cross-contamination and organized so there is a continuous flow of product through the process. The flow of personnel shall be managed such that the potential for contamination is minimized.

Response: Compliant

Summary -

Response: Process flow is designed to prevent contamination.

12.7.2 - Control of Foreign Matter Contamination

12.7.2.1 - The responsibility and methods used to prevent foreign matter contamination of the product shall be documented, implemented, and communicated to all staff.

Response: Compliant

12.7.2.2 - Inspections shall be performed to ensure plant and equipment remains in good condition and potential contaminants have not been detached or become damaged or deteriorated.

Response: Compliant

12.7.2.3 - Containers, equipment, and other utensils made of glass, porcelain, ceramics, laboratory glassware, or other like material (except where product is contained in packaging made from these materials, or measurement instruments with glass dial covers, or MIG thermometers required under regulation) shall not be permitted in food processing/contact zones.

Response: Compliant

12.7.2.4 - Where glass objects or similar material are required to be used by the site in storage and handling areas, they shall be listed in a glass inventory including details of their location.

Response: Compliant

12.7.2.5 - Product that is in glass or similar material that is for distribution purposes shall be stored and handled in a manner that prevents contamination.

Response: Compliant

12.7.2.6 - Regular inspections of storage and handling zones shall be conducted (refer to 2.5.4.3) to ensure they are free of glass or other like material and to establish changes to the condition of the objects listed in the glass inventory.

Response: Compliant

12.7.2.7 - Glass instrument dial covers on equipment and MIG thermometers shall be inspected at regular intervals.

Response: Compliant

12.7.2.8 - Pallets used in food storage shall be made of a suitable material, dedicated for that purpose, clean, maintained in good order, and their condition subject to regular inspection.

Response: Compliant

12.7.2.9 - Wooden pallets and other wooden utensils used in food handling areas shall be dedicated for that purpose, clean, and maintained in good order. Their condition shall be subject to regular inspection.

Response: Compliant

12.7.2.10 - Loose metal objects on equipment, equipment covers, and overhead structures shall be removed or tightly affixed so as not to present a hazard.

Response: Compliant

Summary -

Response: Control of Foreign material contamination rev date 03/11/2025 is documented and implemented. The purpose of this policy is to describe the practices used to prevent foreign matter. Foreign matter is defined as glass and brittle plastic and wood. This procedures includes but not limited to inspection of the facility, training of the employees to flag and report potential or actual contamination and requirements for regular facility inspection. Register of glass and brittle plastic objects is on file and is audited monthly. Wooden pallets are controlled to prevent wood contamination. The program is verified by weekly and monthly GDP inspections. No risk of contamination was observed during the facility walk through. Knives and sharps management program is documented and implemented. Personnel is trained on the policy and report any broken items that can lead to product contamination. Records sighted: glass and brittle plastic inspections for week 1-13 of 2025, monthly GDP inspections, Monthly GMP audit dated 04/16/2024, 07/15/2024, 09/24/2024, 10/31/2024, 12/17/2024, 02/24/2025.

12.7.3 - Managing Foreign Matter Contamination Incidents

12.7.3.1 - In all cases of foreign matter contamination the affected food product shall be isolated, inspected, reworked, or disposed of.

Response: Compliant

12.7.3.2 - In circumstances where glass or similar material breakage occurs, the affected area shall be isolated, cleaned, and thoroughly inspected (including cleaning equipment and footwear) and cleared by a suitably responsible person.

Response: Compliant

Summary -

Response: Managing foreign matter contamination incidents (glass breakage clean up procedure) is documented. The policy and the SOP requires that the affected area is isolated, cleaned and inspected. No glass or brittle plastic spills or evidence of spills was observed in the warehouse.

12.8.1 - Waste Disposal

12.8.1.1 - The responsibility and methods used to collect and handle dry, wet, and liquid waste and store it prior to removal from the premises shall be documented and implemented.

Response: Compliant

12.8.1.2 - Waste shall be removed on a regular basis and not allowed to build up in food handling or storage areas. Designated waste accumulation areas shall be maintained in a clean and tidy condition until external waste collection is undertaken.

Response: Compliant

12.8.1.3 - Trolleys, vehicles, waste disposal equipment, collection bins, and storage areas shall be maintained in a serviceable condition and cleaned and sanitized regularly so as not to attract pests and other vermin.

Response: Compliant

12.8.1.4 - Where applicable, a documented procedure shall be in place for the controlled disposal of trademarked materials. Where a contracted disposal service is used, the disposal process shall be reviewed regularly to confirm compliance.

Response: N/A

Evidence: • No trademarked materials are destroyed in this facility - NA (12.8.1.4)

12.8.1.5 - Inedible waste designated for animal feed shall be stored and handled so that it will not cause a risk to the animal or further processing. If denaturant is used to identify inedible waste, it shall be demonstrated that it does not pose a risk to animal health.

Response: Compliant

12.8.1.6 - Reviews of the effectiveness of waste management will form part of regular hygiene inspections and the results of these inspections shall be included in the relevant hygiene reports (refer to 2.5.4.3).

Response: Compliant

12.8.1.7 - A procedure shall be in place to ensure drainage wastewater is effectively removed from the storage areas (refer to 12.1.2.2). If stored and/or treated on the premises, it shall be stored in a separate storage facility

and suitably contained. Inspections of the drainage system and wastewater storage shall be included in the regular site inspections (refer to 2.5.4.3).

Response: Compliant

Summary -

Response: Waste Disposal policy is dated 03/10/2025. The purpose of this policy is to outline how the site handles waste generated during operations. Dry and Wet waste procedure is established. Liquid waste procedure is established. Collection of solid or liquid waste will be determined by the material being removed. All industrial waste that are liquid or wet will be handled, Wet food waste is to be cleaned within the guidelines of the site Allergen Policy. Program verification is done weekly and monthly via the GDP audits conducted in this facility No trademarked materials are destroyed in this facility - NA (12.8.1.4). Records sighted: Monthly GMP audit dated 04/16/2024, 07/15/2024, 09/24/2024, 10/31/2024, 12/17/2024, 02/24/2025.
