SQF Food Safety Audit Edition 9

Toscana Cheese Company LLC - 5901

Summary

Audit Decision
Certified

Decision Date
September 17, 2026

Recertification Date
September 1, 2027

Expiration Date
November 15, 2027

Issue Date
September 17, 2026

Certificate Number
5901

Audit Type
Recertification

On-Site Audit Dates
August 4, 2026 - August 6, 2026

ICT Dates
-

Audit Rating

Excellent

Facility and Scope

Toscana Cheese Company LLC - 5901

575 Winsor Drive
Secaucus, NJ 7094 United States

Products
Cheese

Food Sector Categories
10. Dairy Food Processing

Scope of Certification
Receipt of raw material, pasteurization, mixing, processing, packaging, storage and distribution of cheeses.

Certification Body and Audit Team

Mérieux NutriSciences Certification LLC

401 N Michigan Ave
Suite 1400
Chicago, IL 60611 United States

CB#: 40757
Accreditation Body: JASANZ
Accreditation Number: Z3720906AB

Lead Auditor: Eugene Velasquez (C-425232)
Technical Reviewer: Sandra Luttrell (C-371630)

Hours Spent on Site: 20
Hours of ICT Activities:
Hours Spent Writing Report: 8

Section Responses

Audit Statement - Audit

SQF Practitioner Name - Name the designated SQF Practitioner

Response: Laura Murcia

SQF Practitioner Email - Email of the designated SQF Practitioner

Response: lmurcia@toscanacheese.com

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

Response: Laura Murcia: QA Manager, Saul Colon: Plant Manager, Eugene Velasquez: 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: Toscana Cheese is located in an industrial park of Secaucus, NJ. The plant partnered with Cheese Merchants of America in June 2022. The facility is a one-story, stand-alone building of approximately 45,000 sq. ft. consisting of production room with three production lines, packing room, curd room, maintenance room, chemical room, dry storage warehouse, two coolers, receiving & shipping docks, finished product lab, and staff amenities. The site has received pasteurized curd since January 2026. The site has 81 employees working 2 production shifts 5 days a week. Sanitation is conducted by employees during the second shift. The site is a Kosher certified facility. Kosher certification expires on 6/1/27 to comply with the highest standards of Orthodox Halacha, Jewish Dietary Laws. NOTE: Gap assessment was conducted for QA audit.

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

Response: Laura Murcia: QA Manager, Saul Colon: Plant Manager, Paula Rodriguez: QA Tech, Ivan Rodriguez: Sanitation Manager, Edwin Fernandez: Production Manager, Rosa Quintero: AM Production Manager, Emmanuel Garcia- PM Production Manager, Francisco Mendez- Maintenance Manager, Avneet Sonna- QA Director (Remote), Eugene Velasquez: Auditor

Auditor Recommendation - Auditor Recommendation

Response: Grant recertification after approval of corrective actions

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 all site personnel in the 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, documentation, and communication to all relevant staff of food safety objectives

and performance measures; ii. Adequate resources are available to meet food safety objectives; iii. Food safety practices and all applicable requirements of the SQF System are adopted and maintained; iv. Employees are informed and held accountable for their food safety and regulatory responsibilities; v. Employees are positively encouraged and required to notify management about actual or potential food safety issues; and vi. Employees 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 site personnel with specific responsibilities for tasks within the food safety management system and identify a backup for the absence of key personnel. Job descriptions for the key personnel shall be documented. Site management shall ensure departments and operations are appropriately staffed and organizationally aligned to meet food safety objectives.

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; 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 related to the management of the site's SQF System; iii. Have completed a HACCP training course; iv. Be competent to implement and maintain HACCP based food safety plans; and v. Have an understanding of the SQF Food Safety Code: Food Manufacturing 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 meet 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: Management Responsibility was revised on 2/26/26 to ensure that the resources required to implement the policy and food safety and quality objectives are available to produce safe food. Food Safety Management policy statement was signed by the management team on 4/28/26 which is available in English and Spanish and posted in prominent areas. The management is committed to providing the consumer with safe products of superior quality. They maintain a HACCP based food safety system and a comprehensive

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quality management system, comply with FDA, USDA and FSMA guidelines, meet customers' requirements for quality, and drive continuous improvement efforts throughout the company. They are committed to their FSQ team, providing with tools, financial resources, and training to facilitate continuous improvement to cultivate a strong food safety culture. Senior Management is committed to promoting a food safety culture by providing necessary resources, training, and support. Leaders will model food safety behaviors and encourage open communication about safety concerns. Food safety culture includes their participation during the audit, identification of non-conformances, and empowerment with education, communication and support. Organizational chart was revised on 6/19/26 headed by the President. Job descriptions of key personnel and their backups were in place. The QA Manager reports to QA Director. The QA Manager is the primary SQF Practitioner (SQFP) – SQF and HACCP certified on 9/1/20 and 12/2/19 respectively. The QA Lead is the backup SQFP – SQF and HACCP certified on 7/7/25 and 7/24/26 respectively. The site is aware of the blackout dates requirements for unannounced audits.

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. Hazard and risk management system; and vi. Follow-up action items from previous management reviews. 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: Management Review policy was revised on 2/26/26 to ensure Senior Management is knowledgeable in the SQF system on an ongoing basis. Annual FSQMS Review was conducted on 6/18/26 to include facility improvements update (e.g. line 3 upgrade, line 1 & 2 cooling canal upgrade, new second cooler, chiller upgrade), SQF Edition 10 transition & gap analysis, customer complaint trend analysis (category & customer analysis, corrective action status, conclusion), USDA regulatory status & CA program, SMETA/ social accountability program, supplier quality & ingredient profile, certifications, CAPA management, document control, training management, audit management, environmental management, air, water, waste & energy management, permits, compliance & legal requirements management, safety hazards & risk assessment/ management of change, food defense & food fraud, RCA & CA management, recall programs, GMPs, and risk assessments. SQF Monthly Management Reviews from January to July 2026 were reviewed to include food safety incidents, CAPAs, FSQ objectives & performance trends, deviations from FSQ plans, internal & external audits, customer complaints & feedback, safety incidents, new product development/ line extensions, training & staffing changes, risk assessment review, additional notes & discussions, and action item tracker.

2.1.3 - Complaint Management (Mandatory)

2.1.3.1 - The methods and responsibility for handling, investigating, and resolving food safety complaints from

commercial customers, consumers, and authorities, arising from products manufactured or handled on-site or co-manufactured, shall be documented and implemented.

Response: Compliant

2.1.3.2 - Adverse trends of customer complaint data shall be investigated and analyzed and the 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: Complaint Management policy was revised on 5/20/26 to describe the management's responsibilities and actions involving customer complaints. Customer Service representative is responsible for receiving of the customer complaint and communicating to SQF Practitioner within 1 business day. The QA Manager begins the investigation within 48 hours of receiving the complaint. A full CAPA is required regardless of whether the complaint is a first time occurrence. CAPA implementation is verified and documented within 30 days of complaint receipt. Trending analysis showed 95, 68 and 63 customer complaints were received in 2023, 2024 and 2025 respectively. There are 28 customer complaints so far this year. Packaging issues, texture and microbiological complaints were the most complaints received last year. Sensory/ quality, packaging issues, and microbiological complaints were the most complaints received this year. Customer complaint on 7/24/26 was reviewed for quality issue (texture). Complaint Log includes complaint category, issue description, CAPA and status.

2.2.1 - Food Safety Management (Mandatory)

2.2.1.1 - The methods and procedures the site uses to meet the requirements of the SQF Food Safety Code: Food Manufacturing shall be maintained in electronic and/or hard copy documentation. They will be made available to relevant staff and include i. A summary of the organization's food safety policies and the methods it will apply to meet the requirements of this standard; ii. The food safety policy statement and organization chart; iii. The processes and products included in the scope of certification; iv. Food safety regulations that apply to the manufacturing site and the country(ies) of sale (if known); v. Raw material, ingredient, packaging, and finished product specifications; vi. Food safety procedures, prerequisite programs, food safety plans; vii. Process controls that impact product safety; and viii. Other documentation necessary to support the development, implementation, maintenance, and control of the SQF System.

Response: Compliant

2.2.1.2 - Food safety plans, Good Manufacturing Practices, and all relevant aspects of the SQF System shall be reviewed, updated, and communicated as needed when any changes implemented have an impact on the site's ability to deliver safe food. All changes to food safety plans, Good Manufacturing Practices, and other aspects of the SQF System shall be validated or justified prior to their implementation. The reasons for the change shall be documented.

Response: Compliant

Summary -

Response: The FSQ manual was in place and implemented to comply with the regulatory and SQF requirements. The manual is available in hard and electronic copies to include the policy statement, organizational chart, certification scope, list of products covered under this scope per FSC 10, food safety plan, PRPs, policies and procedures. Any changes made that may impact food safety or the SQF system must be verified and validated by the SQFP prior to being implemented.

2.2.2 Document Control (Mandatory)

2.2.2.1 - The methods and responsibility for maintaining document control and ensuring staff have access to current requirements and instructions shall be documented and implemented. Current SQF System documents and amendments to documents shall be maintained.

Response: Compliant

Summary -

Response: Document Control and Records policy was revised on 3/25/26 to develop a written procedure, documenting responsibilities for creating and maintaining documents, completing records, and identifying those responsible for verifying the records. Records are maintained for a minimum of 2 years. Electronic versions of obsolete documents are moved to an archive electronic folder. Hard copies are destroyed. Records on 1/12-14/26, 4/1-3/26, and 7/14-16/26 were reviewed.

2.2.3 - Records (Mandatory)

2.2.3.1 - The methods, frequency, and responsibility for verifying, maintaining, and retaining records shall be documented and implemented.

Response: Compliant

2.2.3.2 - All records shall be legible and confirmed by those undertaking monitoring activities that demonstrate inspections, analyses, and other essential activities that have been completed.

Response: Compliant

2.2.3.3 - Records shall be readily accessible, retrievable, and securely stored to prevent unauthorized access, loss, damage, and deterioration. Retention periods shall be in accordance with customer, legal, and regulatory requirements, at minimum the product shelf-life or established by the site if no shelf-life exists.

Response: Compliant

Summary -

Response: Document Control and Records policy was revised on 3/25/26 to develop a written procedure, documenting responsibilities for creating and maintaining documents, completing records, and identifying those responsible for verifying the records. Records are maintained for a minimum of 2 years. Electronic versions of obsolete documents are moved to an archive electronic folder. Hard copies are destroyed. Records on 1/12-14/26, 4/1-3/26, and 7/14-16/26 were reviewed.

2.3.1 - Specification, Formulation, and Realization

2.3.1.1 - The methods and responsibility for designing and developing new product formulations and converting product concepts to commercial realization shall be documented and implemented.

Response: Compliant

2.3.1.2 - New product formulations, manufacturing processes, and the fulfillment of product requirements shall be established, validated, and verified by site trials and product testing as required to ensure product safety. Product formulations shall be developed by authorized persons to ensure that they meet the intended use. Where necessary, shelf life trials shall be conducted to validate and verify a new product's: i. Pre-consumer handling and storage requirements, including the establishment of "use by," "best before dates," or equivalent terminology; ii. Microbiological criteria, where applicable; and iii. Consumer preparation, where applicable, and storage and handling requirements.

Response: Compliant

2.3.1.3 - A food safety plan shall be validated and verified by the site food safety team for each new product and its associated process through conversion to commercial production and distribution or where a change to ingredients, process, or packaging occurs that may impact food safety.

Response: Compliant

2.3.1.4 - Product formulations and manufacturing processes for products included in the scope of certification shall be reviewed when there are changes in materials, ingredients, or equipment.

Response: Compliant

2.3.1.5 - The process flows for all new and existing manufacturing processes shall be designed to ensure that product is manufactured according to approved product formulations and to prevent cross-contamination.

Response: Compliant

2.3.1.6 - Records of product design, formulations, label compliance, process flows, shelf life trials, and approvals for all new and existing products shall be maintained.

Response: Compliant

Summary -

Response: Research & Development Procedure was revised on 12/5/24 to outline the steps and guidelines for the systematic development of fresh mozzarella products to ensure consistency, quality and compliance with food safety and regulatory standards. The procedure applies to all R&D activities related to new product development, product reformulation, process improvements, and testing for fresh mozzarella. The site has not developed any new products since the last SQF audit.

2.3.2 - Specifications (Raw Material, Packaging, Finished Product, and Services)

2.3.2.1 - The methods and responsibility for developing, managing, and approving raw material, finished product, and packaging specifications shall be documented.

Response: Compliant

2.3.2.2 - Specifications for all raw materials and packaging, including, but not limited to, ingredients, additives, hazardous chemicals, processing aids, and packaging that impact finished product safety shall be documented and kept current.

Response: Compliant

2.3.2.3 - All raw materials, packaging, and ingredients, including those received from other sites under the same corporate ownership, shall comply with specifications and with the relevant legislation in the country of

manufacture and country(ies) of destination if known.

Response: Compliant

2.3.2.4 - Raw materials, packaging, and ingredients shall be validated to ensure product safety is not compromised and the material is fit for its intended purpose.

Response: Compliant

2.3.2.5 - Site management shall require approved raw materials suppliers to notify the site of changes in product composition that could have an impact on product formulation (e.g., protein content, moisture, amino acid profiles, contaminant levels, allergens, and/or other parameters that may vary by crop or by season).

Response: Compliant

2.3.2.6 - Verification of packaging shall include a certification of all packaging that comes into direct contact with food meets either regulatory acceptance or approval criteria. Documentation shall either be in the form of a declaration of continued guarantee of compliance, a certificate of conformance, or a certificate from the applicable regulatory agency. In the absence of a certificate of conformance, certificate of analysis, or letter of guarantee, analyses to confirm the absence of potential chemical migration from the packaging to the food contents shall be conducted and records maintained.

Response: Compliant

2.3.2.7 - Finished product labels shall be accurate, comply with the relevant legislation, and be approved by qualified company personnel.

Response: Compliant

2.3.2.8 - Description of services for contract service providers that have an impact on product safety shall be documented, current, include a full description of the services to be provided, and detail relevant training requirements of all contract personnel.

Response: Compliant

2.3.2.9 - Finished product specifications shall be documented, current, approved by the site and its customer, accessible to relevant staff, and shall include, where applicable: i. Microbiological, chemical, and physical limits; ii. Composition to meet label claims; iii. Labeling and packaging requirements; and iv. Storage conditions.

Response: Compliant

2.3.2.10 - Specifications for raw materials and packaging, chemicals, processing aids, contract services, and finished products shall be reviewed as changes occur that impact product safety. Records of reviews shall be maintained. A list of all the above specifications shall be maintained and kept current.

Response: Compliant

Summary -

Response: Specifications (Raw Material, Packaging, Finished Product and Services) policy was in place to describe the methods, criteria and responsibilities. Ingredient Register was revised on 5/14/26 to include but not Montena- Taranto Foods, Cheese Merchants of America, and Morton Salt. Packaging Materials Register was revised on 5/14/26 to include but not limited to Supply One, Belmark and Mooney General. Finished Product Specifications Register was revised on 12/3/25 to include item #, pack size, label, description, packaging, and shelf life. Finished product specifications for KS Fresh Mozzarella Sliced, Cortona Mozzarella Cheese, and Table 87 Fresh Mozzarella Loaf were reviewed. Contract Services Register was revised on 4/30/26

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to include but not limited to Vestis, ChemStation, RK Environmental, Hereema Company, Atlantic Scales, FOSS, Matrix Sciences, and Mateer Associates.

2.3.3 - Contract Manufacturers

2.3.3.1 - The methods and responsibility for ensuring all agreements with contract manufacturers relating to food safety, customer product requirements, their realization, and delivery shall be documented and implemented.

Response: Compliant

2.3.3.2 - The site shall establish a method to determine the food safety risk level of contract manufactured product and shall document the risk. The site shall ensure that: i. Products and processes of co-manufacturers that are considered high-risk have undergone an audit by the site or third-party agency to confirm compliance with the SQF Food Safety Code: Food Manufacturing and regulatory and customer requirements; ii. Products and processes of co-manufacturers that are considered low-risk meet the requirements of the SQF Food Safety Code: Food Manufacturing, or other GFSI benchmarked certification programs, and regulatory and customer requirements; and iii. Changes to contractual agreements are approved by both parties and communicated to relevant personnel.

Response: Compliant

2.3.3.3 - Contractual agreements with third party storage and distribution businesses shall include requirements relating to customer product requirements and compliance with clause 2.3.3.2 of the SQF Food Safety Code: Food Manufacturing. Contractual agreements shall be approved by both parties and communicated to relevantpersonnel. The site shall verify compliance with the SQF Code and ensure that customer and regulatory requirements are being met at all times.

Response: N/A

Evidence: • The site does not use third party storage facilities.

2.3.3.4 - Records of audits, contracts, and changes to contractual agreements and their approvals shall be maintained.

Response: N/A

Evidence: • The site does not use third party storage facilities.

Summary -

Response: Contract Manufacturers policy was revised on 8/26/24. All agreements involving Toscana Cheese and the contract manufacturers will be maintained and implemented. The site utilizes Montena Taranto Foods and Cheese Merchants as contract manufacturers. Montena Taranto Foods SQF certification expires on 12/18/26. Cheese Merchants SQF certification expires on 5/15/27. The site does not use third party storage facilities.

2.3.4 - Approved Supplier Program (Mandatory)

2.3.4.1 - The responsibility and procedure for selecting, evaluating, approving, and monitoring an approved supplier shall be documented and implemented. A current record of approved suppliers, receiving inspections, and supplier audits shall be maintained. Code Amendment #2 Approved supplier registers shall include supplier contact details. All approved and emergency suppliers shall be registered.

Response: Compliant

2.3.4.2 - The approved supplier program shall be based on the past performance of a supplier and the risk level of the raw materials, ingredients, processing aids, packaging, and services supplied, and shall contain at a minimum: i. Agreed specifications (refer to 2.3.2); ii. Reference to the level of risk applied to raw materials, ingredients, packaging, and services from the approved supplier; iii. A summary of the food safety controls implemented by the approved supplier; iv. Methods for granting approved supplier status; v. Methods and frequency of monitoring approved suppliers; vi. Details of the certificates of conformance, if required; and vii. Methods and frequency of reviewing approved supplier performance and status.

Response: Compliant

2.3.4.3 - Verification of raw materials shall include certificates of conformance, certificates of analysis, or sampling, and testing. The verification frequency shall be identified by the site.

Response: Compliant

2.3.4.4 - The receipt of raw materials, ingredients, processing aids, and packaging from nonapproved suppliers shall be acceptable only in an emergency situation and provided a receiving inspection or analysis is conducted and recorded before use.

Response: Compliant

2.3.4.5 - Raw materials, ingredients, and packaging 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

2.3.4.6 - Supplier audits shall be based on risk (as determined in 2.3.4.2) and shall be conducted by individuals knowledgeable of applicable regulatory and food safety requirements and trained in auditing techniques.

Response: Compliant

Summary -

Response: Approved Suppliers Program was revised on 1/28/26 to describe the process for controlling the purchasing process to ensure that purchased raw materials and food contact packaging materials are safe to use, fit for its intended purpose, and conforms to requirements. It also includes the process for selecting, auditing, and approving vendors and suppliers. Approved Suppliers Register was revised on 5/14/26 to include ingredients, packaging and contract manufacturers. Audit certificates were reviewed to include Montena Taranto Foods- SQF cert expiry 12/18/26, Cheese Merchants of America- SQF cert expiry 5/15/27, Morton Salt- FSSC 22200 cert expiry 5/23/29, Supply One- Cert expiry 1/28/27, Belmark- SQF cert expiry 2/18/27, and Mooney General- ISO 9001 cert expiry 11/5/25.

2.4.1 - Food Legislation (Mandatory)

2.4.1.1 - The site shall ensure that at the time of delivery to customers finished products shall comply with food safety legislation applicable in the country of manufacture and sale. This includes compliance with legislative requirements applicable to maximum residue limits, food safety, packaging, product description, net weights, nutritional, allergen, and additive labeling, labeling of identity preserved foods, any other criteria listed under food legislation, and to relevant established industry codes of practice.

Response: Compliant

2.4.1.2 - The methods and responsibility for ensuring the site 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 was revised on 3/25/25 to ensure that all applicable food regulations that the product is processed in and the country in which the product will be sold are met and. It also ensures that the site adheres to FDA requirements governing operation and administration of food safety procedures to produce food that is wholesome and unadulterated. There was no evidence that products delivered to customers did not meet regulatory requirements. SQFI and CB shall be notified within 24 hours upon identification of a food safety event.

2.4.2 - Good Production Practices (Mandatory)

2.4.2.1 - The site shall ensure the applicable Good Manufacturing Practices described in Module 11 of this Food Safety Code are applied or exempted according to a written risk analysis outlining the justification for exemption or evidence of the effectiveness of alternative control measures that ensure food safety is not compromised.

Response: Compliant

2.4.2.2 - The Good Manufacturing Practices applicable to the scope of certification outlining how food safety is controlled and assured shall be documented and implemented.

Response: Compliant

Summary -

Response: GMP program was in place to comply with SQF and regulatory requirements. There were no exemptions to the code requirements. The employees are responsible for adhering to the GMP policy and their personnel hygiene to ensure compliance. GMP protocols were documented and implemented as observed during the audit.

2.4.3 - Food Safety Plan (Mandatory)

2.4.3.1 - A food safety plan shall be prepared in accordance with the twelve steps identified in the Codex Alimentarius Commission HACCP guidelines. The food safety plan shall be effectively implemented and maintained and shall outline how the site controls and assures food safety of the products or product groups included in the scope of the SQF certification and their associated processes. More than one HACCP food safety plan may be required to cover all products included in the scope of certification.

Response: Compliant

2.4.3.2 - The food safety plan or plans shall be developed and maintained by a multidisciplinary team that includes the SQF practitioner and those site personnel with technical, production, and engineering knowledge of the relevant raw materials, packaging, processing aids, products, and associated processes. Where the relevant expertise is not available on-site, advice may be obtained from other sources to assist the food safety team.

Response: Compliant

2.4.3.3 - 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

2.4.3.4 - Product descriptions shall be developed and documented for all products included in the scope of the food safety plans. The descriptions shall reference the finished product specifications (refer to 2.3.2.9) plus any additional information relevant to product safety, such as pH, water activity, composition, and/or storage conditions.

Response: Compliant

2.4.3.5 - The intended use of each product shall be determined and documented by the food safety team. This shall include target consumer groups, the potential for consumption by vulnerable groups of the population, requirements for further processing if applicable, and potential alternative uses 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, all raw materials, packaging, service inputs (e.g., water, steam, gasses as applicable), scheduled process delays, and all process outputs including 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 raw materials and other 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 (i.e., 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 limits that separate safe from unsafe product (critical limits). 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 monitoring, 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: Food Safety Plan was reviewed on 2/4/26 to include the food safety team, product description, ingredients & raw materials list, flow chart, hazard analysis, and PPC summary. The process flow chart includes all the inputs and outputs from receiving to shipping process steps. The hazard analysis includes biological (Bacillus cereus, Clostridium botulinum, Brucella spp., Campylobacter spp., E. coli, Salmonella, LM, S. aureus), chemical (undeclared allergen, unapproved chemical additives), radiological and physical (foreign material, metal, wood, glass) hazards. PPC was identified at the metal detection process step. All product must pass through the operational metal detector using seeded samples (4.0-5.5 mm FE & NFE, 4.5-7.0 mm SS 316) at line-specific sensitivity setting at the beginning, hourly and end of production. If it fails one time, re-run twice and dispose it if it fails again. Preventive controls include allergen, sanitation and supply chain PCs. PPC summary includes process step, hazard, monitoring activity & frequency, CA, records, and verification activities. Metal Detection- PPC Records on 1/12-14/26, 4/1-3/26, and 7/14-16/26 were reviewed.

2.4.4 - Product Sampling, Inspection, and Analysis

2.4.4.1 - The methods, responsibility, and criteria for sampling, inspecting, and/or analyzing raw materials, work-in-progress, and finished product shall be documented and implemented. The methods applied shall ensure that inspections and analyses are completed at regular intervals as required and to agreed specifications and legal requirements. Sampling and testing shall be representative of the process batch and ensure that process controls are maintained to meet specification and formulation.

Response: Compliant

2.4.4.2 - Product analyses shall be conducted to nationally recognized methods or company requirements, or alternative methods that are validated as equivalent to the nationally recognized methods. Where internal laboratories are used to conduct input, environmental, or product analyses, sampling and testing methods shall be in accordance with the applicable requirements of ISO/IEC 17025, including annual proficiency testing for staff conducting analyses. External laboratories shall be accredited to ISO/IEC 17025, or an equivalent international standard, and included on the site's contract service specifications list (refer to 2.3.2.11).

Response: Compliant

2.4.4.3 - On-site laboratories conducting chemical and microbiological analyses that may pose a risk to product safety shall be located separate from any food processing or handling activity and designed to limit access only to authorized personnel. Signage shall be displayed identifying the laboratory area as a restricted area, accessible only by authorized personnel.

Response: Compliant

2.4.4.4 - Provisions shall be made to isolate and contain all hazardous laboratory waste held on the premises and manage it separately from food waste. Laboratory waste outlets shall at a minimum be downstream of drains that service food processing and handling areas.

Response: Compliant

2.4.4.5 - Retention samples, if required by customers or regulations, shall be stored according to the typical storage conditions for the product and maintained for the stated shelf-life of the product.

Response: Compliant

2.4.4.6 - Records of all inspections and analyses shall be maintained.

Response: Compliant

Summary -

Response: Product Sampling, Inspection, and Analysis policy was revised on 6/16/25 to outline the responsibility and criteria for sampling, inspecting, and analyzing raw materials, WIP and finished products. The program includes water analysis, finished product microbiology, ATP swabs, CCP monitoring, antibiotics, somatic cell counts, product temp, content analysis, GMPs, environmental monitoring, and air quality. QA performs moisture, fat, protein, salt, pH, and organoleptic testing. The QA Lab is located away from the processing areas. Proficiency testing was conducted on 4/6/26 showing satisfactory results for APC, E. coli, yeast and mold. Matrix Sciences Certification expires on 5/14/28. Eurofins Labs Certification expires on 3/31/27. Products are retained until the end product code for sensory analysis. Product sampling is sent to an outside lab for testing to comply with customer specific requirements. Analytical Test Report on 8/3/26 showed acceptable and/or negative results or APC, coliforms, E. coli, LM, Salmonella, S. aureus, yeast and mold. Shelf Life Program was revised on 2/19/26 to establish, validate, and verify microbiological safety, chemical stability, and overall quality of finished products throughout their declared shelf life. Inspection Records on 1/12-14/26, 4/1-3/26, and 7/14-16/26 were reviewed.

2.4.5 - Non-conforming Materials and Product

2.4.5.1 - The responsibility and methods outlining how to handle non-conforming product, raw material, ingredient, work-in-progress, or packaging, which is detected during receipt, storage, processing, handling, or delivery, shall be documented and implemented. The methods applied shall ensure i. Non-conforming product is quarantined, identified, handled, and/or disposed of in a manner that minimizes the risk of inadvertent use, improper use, or risk to the integrity of finished product; and ii. All relevant personnel are aware of the organization's quarantine and release requirements applicable to product placed under quarantine status.

Response: Compliant

2.4.5.2 - Quarantine records and records of the handling, corrective action, or disposal of nonconforming materials or product shall be maintained.

Response: Compliant

Summary -

Response: Control of Non-Conforming Materials, Product and Equipment policy was revised on 12/2/25 to address the process in handling non-conforming materials, product and equipment. Any product or material that does not meet company specifications, customer requirements, regulatory standards, or CCP limits. Red Hold Tag is applied to product on hold pending investigation or testing. Yellow Hold Tag is applied to product identified as inedible and destined for disposal. Only authorized QA personnel may apply, remove, or release HOLD tags or release product from quarantine. Hold/Reject/ Release Product Logs from October 2025 to July 2026 were maintained to include product code & label, quantity, reason for hold, status, release date, QA verification, and justification.

2.4.6 - Product Rework

2.4.6.1 - The responsibility and methods outlining how ingredients, packaging, or products are reworked shall be documented and implemented. The methods applied shall ensure: i. Reworking operations are overseen by qualified personnel; ii. Reworked product is clearly identified and traceable; iii. Reworked product is processed in accordance with the site's food safety plan; iv. Each batch of reworked product is inspected or analyzed as required before release; v. Inspections and analyses conform to the requirements outlined in element 2.4.4.1; vi. Release of reworked product conforms to element 2.4.7; and vii. Reworked product does not affect the safety or integrity of the finished product. Records of all reworking operations shall be maintained.

Response: N/A

Evidence: • The facility does not perform product rework.

Summary -

Response: The facility does not perform product rework.

2.4.7 - Product Release (Mandatory)

2.4.7.1 - The responsibility and methods for releasing products shall be documented and implemented. The methods applied shall ensure the product is released by authorized personnel, and only after all inspections and analyses are successfully completed and documented to verify legislative and other established food safety controls have been met. Records of all product releases shall be maintained.

Response: Compliant

2.4.7.2 - Product release shall include a procedure to confirm that product labels comply with the food legislation that applies in the country of manufacture and the country(ies) of use or sale if known (refer to 2.4.1.1). If product is packaged and distributed in bulk or unlabeled, product information shall be made available to inform customers and/or consumers of the requirements for its safe use.

Response: Compliant

2.4.7.3 - In the event that the site uses positive release based on product pathogen or chemical testing, a procedure shall be in place to ensure that product is not released until acceptable results have been received. In the event that off-site or contract warehouses are used, these requirements shall be effectively communicated and verified as being followed.

Response: Compliant

Summary -

Response: Product Hold & Release policy was revised on 7/21/25 to establish an efficient procedure for placing defective and/or hazardous food products on hold, to prevent these products from being sold at retail stores or shipped to customers. Product disposition depends on lab results. QA verifies product meets all FSQ requirements prior to release. Records on 1/12-14/26, 4/1-3/26, and 7/14-16/26 were reviewed.

2.4.8 - Environmental Monitoring

2.4.8.1 - A risk-based environmental monitoring program shall be in place for all food manufacturing processes and immediate surrounding areas, which impact manufacturing processes. The responsibility and methods 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) shall be implemented where unsatisfactory results or trends are observed.

Response: Compliant

Summary -

Response: Environmental Monitoring Program (EMP) was revised on 5/13/26 to outline procedures for the routine monitoring of the processing environment to verify control of microbiological hazards, prevent cross-contamination, and ensure food safety to comply with SQF and FDA requirements. The program includes responsibilities, target organisms, zone identification, limits, sampling plan & procedure, laboratory testing, CAs, verification, data review & trending, and training. EMP Data from January to July 2026 was maintained. Positive results for Listeria was received on 6/6/26 collected from the boxing room floor (OS#25). Analytical Test Reports on 6/3/26, 6/9/26 and 6/11/26 showed negative results for Listeria after re-cleaning and retesting. EMP Trending Report 2025-2026 showed Listeria: 888 swabs & Salmonella: 149 swabs- All negative results last year and Listeria: 569 swabs- 1 presumptive & 2 positive results and Salmonella: 285 swabs- All negative results this year. EMP Risk Assessment was conducted on 3/25/26 to include potential risks, risk level and control measures.

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 validate that: i. Good Manufacturing 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: Verification and Validation Program was revised on 6/29/26 to ensure that the methods, responsibility, and criteria for ensuring the effectiveness of all applicable elements of the SQF program shall be in place and implemented. Validation and Verification Activity Matrix was in place to include activity type, validation and verification activities, frequency and responsible party to include GMP, PPC, allergen control, internal audits, food safety plan, training program, product testing, sanitation, and labeling/ regulatory. Verification and Validation Schedule was revised on 6/29/26.

2.5.2 - Verification Activities (Mandatory)

2.5.2.1 - The methods, responsibility, and criteria for verifying monitoring of Good Manufacturing Practices, critical control points, and 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 verification of activities shall be maintained.

Response: Compliant

Summary -

Response: Verification and Validation Program was revised on 6/29/26 to ensure that the methods, responsibility, and criteria for ensuring the effectiveness of all applicable elements of the SQF program shall be in place and implemented. Validation and Verification Activity Matrix was in place to include activity type, validation and verification activities, frequency and responsible party to include GMP, PPC, allergen control, internal audits, food safety plan, training program, product testing, sanitation, and labeling/ regulatory. Verification and Validation Schedule was revised on 6/29/26.

2.5.3 - Corrective and Preventative Action (Mandatory)

2.5.3.1 - The responsibility and methods outlining how corrective and preventative actions are determined, implemented, and verified, including the identification of the root cause and resolution of non-compliance of critical food safety limits and deviations from food safety requirements, shall be documented and implemented. Deviations from food safety requirements may include customer complaints, nonconformances raised at internal or external audits and inspections, non-conforming product and equipment, withdrawals and recalls, as appropriate.

Response: Compliant

2.5.3.2 - Records of all investigation, root cause analysis, and resolution of non-conformities, their corrections, and the implementation of preventative actions shall be maintained.

Response: Compliant

Summary -

Response: Corrective and Preventive Action Program was revised on 5/20/26 to ensure proper investigation and identification of the cause of a critical non-compliance of FSQ limits. Once the cause is identified, effective CAPAs are implemented to prevent future non-compliances. The SQF Practitioner is responsible for the implementation of the program including classification, tracking, trending, and processing CAPAs. CAPA Records were maintained to include customer complaints, internal & external audits, and other non-conformances. CAPA Logs on 1/27/26 (too mushy) and 4/3/26/26 (discoloration) were reviewed to include description of the problem, investigation, root cause, findings, CAPA, and CAPA effectiveness.

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: Food Manufacturing are audited per the SQF audit checklist or a similar tool; ii. Objective evidence is recorded to verify compliance and/or non-compliance; iii. Corrective and preventative actions of deficiencies identified during the internal audits are undertaken; and iv. Audit results are communicated to relevant management personnel and staff responsible for implementing and verifying corrective and preventative actions.

Response: Minor

Evidence: • The SQF Audit was not conducted annually to include modules 2 and 11 checklists.

Root Cause: QAS-01-032 (Internal Audits & Inspections) defines the internal audit program as fulfilling SQF Edition 9 requirements, and the desktop review process requires comparison against SQF Edition 9 Code requirements. However, the procedure does not include a step requiring verification that the checklist being used matches the currently certified SQF edition prior to conducting the audit. With SQF Edition 10 having become publicly available, the Edition 10 Food Manufacturing Checklist was used in place of Edition 9, and this substitution was not caught due to the absence of a formal edition-verification checkpoint in the procedure.

Corrective Action: The internal audit was re-completed using the correct SQF Edition 9 Food Manufacturing Checklist, covering Module 2 (System Elements) and Module 11. In addition, QAS-01-032 has been revised to add a documented step requiring the QA Manager / SQF Practitioner to confirm the checklist edition matches the facility's currently certified SQF edition before beginning any internal audit, desktop review, or field verification activity. This verification step will be reinforced whenever a new SQF edition is released, to prevent premature use of a newer edition ahead of the facility's actual recertification

Verification Of Closeout: Reviewed the completed SQF audit and updated Internal Audits & Inspections program

Completion Date: August 27, 2026 **Closeout Date:** September 1, 2026

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

Response: Compliant

2.5.4.3 - Regular inspections of the site and equipment shall be planned and carried out to verify Good

Manufacturing Practices and facility and equipment maintenance are compliant to the SQF Food Safety Code: Food Manufacturing. The site shall: i. Take corrections or corrective and preventative action; and ii. Maintain records of inspections and any corrective actions taken.

Response: Compliant

2.5.4.4 - Records of internal audits and inspections and any corrective and preventative actions taken as a result of internal audits shall be recorded as per 2.5.3.Changes implemented from internal audits that have an impact on the site's ability to deliver safe food shall require a review of applicable aspects of the SQF System (refer to 2.3.1.3).

Response: Compliant

Summary -

Response: Internal Audit & Inspections Program was reviewed on 7/29/26 to define the methods and responsibilities for scheduling and conducting internal audits and to verify the effectiveness of SQF system including facility & equipment inspections, PRPs, food safety plans, PPCs, and regulatory compliance. The QA Manager and QA Lead had completed Internal Auditor Training on 7/26/22 and 7/8/25 respectively. The SQF Audit Checklist was last completed on 7/31/25. Internal Audit training for other internal auditors was conducted on 1/9/26. Monthly GMP Internal Inspections from January to July 2026 were reviewed t include corrective actions for the findings. MINOR: The SQF Audit was not conducted annually to include modules 2 and 11 checklists.

2.6.1 - Product Identification (Mandatory)

2.6.1.1 - The methods and responsibility for identifying raw materials, ingredients, packaging, work-in-progress, process inputs, and finished products during all stages of production and storage shall be documented and implemented to ensure: i. Raw materials, ingredients, packaging, work-in-progress, process inputs, and finished products are clearly identified during all stages of receipt, production, storage, and dispatch; and ii. Finished product is labeled to the customer specification and/or regulatory requirements.

Response: Compliant

2.6.1.2 - Product start-up, product changeover, and packaging changeover (including label changes) procedures shall be documented and implemented to ensure that the correct product is in the correct package and with the correct label and that the changeover is inspected and approved by an authorized person. Procedures shall be implemented to ensure that label use is reconciled, and any inconsistencies investigated and resolved. Product changeover and label reconciliation records shall be maintained.

Response: Compliant

Summary -

Response: Product Identification, Trace, Withdrawal and Recall Program was revised on 3/25/26 to establish a formal, structural process for the identification, evaluation, communication, and execution of product withdrawals or recalls. Product Identification policy was in place to establish, document, implement, and maintain procedures for the identification of all product components and final products. Changeover procedure was revised on 5/22/25 to ensure that products produced immediately following a molder changeover meet defined quality specifications, particularly for moisture, texture, shape, and weight. Product changeover and label reconciliation records shall be maintained. Packing Verification Logs Records on 1/12-14/26, 4/1-3/26, and 7/14-16/26 were reviewed to include product code & date, case label & film, seal, and leaker.

2.6.2 - Product Trace (Mandatory)

2.6.2.1 - The responsibility and methods used to trace product shall be documented and implemented to ensure: i. Finished product is traceable at least one step forward to the customer and at least one step back from the process to the manufacturing supplier; ii. The receipt dates of raw materials, ingredients, food contact packaging and materials, and other inputs are recorded (refer to 2.8.1.8 for traceback of allergen containing food products.); iii. Traceability is maintained where product is reworked (refer to 2.4.6); and iv. The effectiveness of the product trace system is reviewed at least annually, as part of the product recall and withdrawal review (refer to 2.6.3.2). Records of raw and packaging material receipt and use and finished product dispatch and destination shall be maintained.

Response: Compliant

Summary -

Response: Product Identification, Trace, Withdrawal and Recall Program was revised on 7/10/25 to establish a formal, structural process for the identification, evaluation, communication, and execution of product withdrawals or recalls. Mock Recall Procedure was revised on 7/15/25 to evaluate the site's ability to rapidly and effectively identify, locate and account for potentially affected products through a simulated recall. Mock recall exercises shall be conducted at least twice per calendar year with 100% recovery within 2 hours. A product mock recall was conducted during the audit for Item # 1189000 with Lot # TC6097. Produced 425 cs on 4/7/26. Shipped 425 cs on 4/14/26 to one customer. 100% recovery within 63 minutes. All support documents were reviewed including lot codes of raw and packaging materials to produce this product. Curd- Lot # 6097 received on 4/7/26. Salt- Lot # SS26082012 received on 3/31/26.Film- Lot # 1920877 received on 12/16/25.

2.6.3 - Product Withdrawal and Recall (Mandatory)

2.6.3.1 - The responsibility and methods used 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 management procedures to be implemented, including sources of legal, regulatory, and expert advice, and essential traceability information; iii. Outline a communication plan to inform site personnel, customers, consumers, authorities, and other essential bodies in a timely manner appropriate about the nature of the incident; and iv. Ensure that SQFI, the certification body, and the appropriate regulatory authority are listed as essential organizations and notified in instances of a food safety incident of a public nature or product recall for any reason.

Response: Compliant

2.6.3.2 - The product withdrawal and recall system shall be reviewed, tested, and verified as effective at least annually. Testing shall include incoming materials (minimum traceability one step back) and finished product (minimum traceability one step forward). Testing shall be carried out on products from different shifts and for materials (including bulk materials) that are used across a range of products and/or products that are shipped to a wide range of customers.

Response: Compliant

2.6.3.3 - Records shall be maintained of withdrawal and recall tests, root cause investigations into actual withdrawals and recalls, and corrective and preventative actions applied.

Response: Compliant

2.6.3.4 - 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: Product Identification, Trace, Withdrawal and Recall Program was revised on 7/10/25 to establish a formal, structural process for the identification, evaluation, communication, and execution of product withdrawals or recalls. The program includes recall team & responsibilities, internal and external contacts. SQFI and CB shall be notified within 24 hours upon identification of a food safety event. The site has not had a recall or product withdrawal since the previous SQF audit. Three mock recalls were successfully conducted as follows: Packaging (Plastic Film)- 7/29/26 Lot #: 1965094 Received 414400 imp on 5/13/26 Used 414400 imp from 6/8/26 to 7/24/26 100% recovery within 35 minutes Finished Product (12-007 16 oz Slice- 6/1 LB HT- 5/19/26 Lot #: TC6016, 12-007 Produced 604 cases on 1/16/26 Shipped 604 cases on 1/20/26 to Harris Teeter 100% recovery within 25 minutes Ingredient (Salt)- 3/24/26 Lot #: SS26009016 Received 41650 lbs on 1/19/26 Used 41650 lbs from 1/22/26 to 2/6/26 100% recovery within 45 minutes All support documentation was reviewed.

2.6.4 - Crisis Management Planning

2.6.4.1 - A crisis management plan based on the understanding of known potential dangers (e.g., flood, drought, fire, tsunami, or other severe weather events, warfare or civil unrest, computer outage, pandemic, loss of electricity or refrigeration, ammonia leak, labor strike) that can impact the site's ability to deliver safe food shall be documented by senior management, outlining the methods and responsibility the site shall implement to cope with such a business crisis. The crisis management plan shall include at a minimum: i. A senior manager responsible for decision making, oversight, and initiating actions arising from a crisis management incident; ii. The nomination and training of a crisis management team; iii. The controls implemented to ensure any responses do not compromise product safety; iv. The measures to isolate and identify product affected by a response to a crisis; v. The measures taken to verify the acceptability of food prior to release; vi. The preparation and maintenance of a current crisis alert contact list, including supply chain customers; vii. Sources of legal and expert advice; and viii. The responsibility for internal communications and communicating with authorities, external organizations, and media.

Response: Compliant

2.6.4.2 - 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: Crisis Management (CM) Plan was revised on 4/1/26 to define the requirements for CM plan and emergency action plans based on the known or potential dangers. It also describes the methods and responsibilities that the crisis team shall implement and the measures taken to ensure delivery of safe food. The program includes CM team, responsibilities, internal and external contacts. The QA Manager is the CM Coordinator. Emergency Contact List was revised on 4/1/26. A mock crisis exercise was conducted on 4/1/26 for utility loss as documented on the Crisis Activation & Response Log. All affected product were placed on hold pending temperature log review and product-specific risk assessment.

2.7.1 - Food Defense Plan (Mandatory)

2.7.1.1 - A food defense threat assessment shall be conducted to identify potential threats that can be 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 site personnel, contractors, and visitors.

Response: Compliant

2.7.1.3 - Instruction shall be provided to all relevant staff 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 and tests of the food defense plan shall be maintained.

Response: Compliant

Summary -

Response: Food Defense Plan was revised on 6/17/26 to establish the food defense measures implemented at the facility, to protect against intentional adulteration and to ensure product integrity, regulatory compliance, and alignment with SQF code and customer requirements. Food defense team, responsibilities, internal and external contacts were in place. Food Defense Plan Assessment was performed on 6/17/26 to include vulnerability assessment and mitigation strategies. Annual food defense test was conducted on 7/27/26 for an unfamiliar individual attempting to enter through the side employee entrance without proper identification. The vendor was immediately escorted to the correct entry point and signed per company policy. Security camera footage was reviewed to confirm that the vendor did not access production. Food defense training was conducted in July 2026.

2.7.2 - Food Fraud (Mandatory)

2.7.2.1 - The methods, responsibility, and criteria for identifying the site's vulnerability to food fraud, including susceptibility to raw material or ingredient substitution, finished product mislabeling, dilution, or counterfeiting, shall be documented, implemented, and maintained.

Response: Compliant

2.7.2.2 - A food fraud mitigation plan shall be developed and implemented that specifies the methods by which the identified food fraud vulnerabilities shall be controlled, including identified food safety vulnerabilities of ingredients and materials.

Response: Compliant

2.7.2.3 - Instruction shall be provided to all relevant staff on the effective implementation of the food fraud mitigation plan (refer to 2.9.2.1).

Response: Compliant

2.7.2.4 - 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 Program was revised on 3/25/26 to define the methods, responsibility, and criteria for identifying food fraud vulnerability in the supply chain and in the manufacturing processes. All new suppliers and raw materials are evaluated for food fraud risks as part of the Approved Supplier Program. The site performs a comprehensive food fraud vulnerability assessment annually using the food safety risk matrix. Food fraud vulnerability assessment was conducted on 1/15/26 showing low risk for salt and high risk for pasteurized curd.

2.8.1 - Allergen Management (Mandatory)

2.8.1.1 - The responsibility and methods used to control allergens and to prevent sources of allergens from contaminating product shall be documented and implemented. The allergen management program shall include: i. A risk analysis of those raw materials, ingredients, and processing aids, including food grade lubricants, that contain food allergens; ii. An assessment of workplace-related food allergens that may originate from locker rooms, vending machines, lunchrooms, and visitors; iii. A list of allergens that is applicable in the country of manufacture and the country(ies) of destination, if known; iv. A list of allergens that is accessible to relevant staff; v. The control of hazards associated with allergens and incorporated into the food safety plan; and vi. Management plans for control of the identified allergens.

Response: Compliant

2.8.1.2 - Instructions shall be provided to all relevant staff involved in the receipt or handling of raw materials, work-in-progress, rework, or finished product on how to identify, handle, store, and segregate raw materials and products containing allergens.

Response: Compliant

2.8.1.3 - Provisions shall be made to clearly identify and segregate foods that contain allergens. Segregation procedures shall be implemented and continually monitored.

Response: Compliant

2.8.1.4 - Where allergenic material may be intentionally or unintentionally present cleaning and sanitation of product contact surfaces between line changeovers shall be effective, appropriate to the risk and legal requirements, and sufficient to remove all potential target allergens from product contact surfaces, including aerosols as appropriate, to prevent cross-contact. Separate handling and production equipment shall be provided, where satisfactory line hygiene and clean-up or segregation are not possible.

Response: Compliant

2.8.1.5 - Based on risk assessment, procedures for validation and verification of the effectiveness of the cleaning

and sanitation of areas and equipment in which allergens are used shall be documented and effectively implemented.

Response: Compliant

2.8.1.6 - Where allergenic material may be present, product changeover procedures shall be documented and implemented to eliminate the risk of cross-contact.

Response: Compliant

2.8.1.7 - The product identification system (refer to 2.6.1.1) shall make provision for clear identification and labeling, in accordance with the regulatory requirements of those products produced on production lines and equipment on which foods containing allergens are manufactured.

Response: Compliant

2.8.1.8 - The product trace system (refer to 2.6.2) shall take into consideration the conditions under which allergen-containing foods are manufactured and ensure full traceback of all ingredients and processing aids used.

Response: Compliant

2.8.1.9 - The site shall document and implement methods to control the accuracy of finished product labels (or consumer information where applicable) and assure work-in progress and finished product are true to label with regard to allergens. Measures may include label approvals at receipt, label reconciliations during production, destruction of obsolete labels, verification of labels on finished product as appropriate, and product change over procedures.

Response: Compliant

2.8.1.10 - Re-working of product (refer to 2.4.6) containing food allergens shall be conducted under conditions that ensure product safety and integrity are maintained. Re-worked product containing allergens shall be clearly identified and traceable.

Response: Compliant

2.8.1.11 - Sites that do not handle allergenic materials or produce allergenic products shall document, implement and maintain an allergen management program addressing at a minimum the mitigation of introduced or unintended allergens through supplier, contract manufacturer, site personnel, and visitor activities.

Response: Compliant

Summary -

Response: Allergen Management Program was revised on 6/30/26 to describe the allergen management process that is sued to prevent sources of allergens from contaminating products. Milk is the only allergen in the facility. Allergen risk assessment was conducted on 5/20/26 to include ingredient, vending machines, and employee lunches. Allergen training is conducted annually.

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: SQF Practitioner and/or department managers are responsible for training their employees. Rootwurks platform is utilized for their training needs. The QA Manager and QA Lead are both HACCP and SQF certified.

2.9.2 - Training Program (Mandatory)

2.9.2.1 - A training program shall be documented and implemented that at a minimum outlines the necessary competencies for specific duties and the training methods to be applied to personnel carrying out tasks associated with: i. Implementing HACCP for staff involved in developing and maintaining food safety plans; ii. Monitoring and corrective action procedures for all staff engaged in monitoring critical control points (CCPs); iii. Personal hygiene for all staff involved in the handling of food products and food contact surfaces; iv. Good Manufacturing Practices and work instructions for all staff engaged in food handling, food processing, and equipment; v. Sampling and test methods for all staff involved in sampling and testing of raw materials, packaging, work-in-progress, and finished products; vi. Environmental monitoring for relevant staff; vii. Allergen management, food defense, and food fraud for all relevant staff; and viii. Tasks identified as critical to meeting the effective implementation and maintenance of the SQF code. The training program shall include provisions for identifying and implementing the refresher training needs of the organization.

Response: Compliant

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

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: Training Program was revised on 6/17/26 to define the methods and responsibilities for establishing and implementing the food safety training programs at the facility. Rootwurks platform is utilized for their training needs. Employees are trained upon hire and annually thereafter. Training Matrix (95% completion) was updated on 7/27/26 to include but not limited to blood borne pathogens, allergens, food safety culture, food fraud, food defense, personal hygiene, SQF, preventing contamination, cleaning & sanitation, and chemical handling. Training is administered in English and Spanish. Training verification (e.g. quiz) of training effectiveness was in place.

11.1.1 - Premises Location and Approval

11.1.1.1 - 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: Premises Location and Approval policy was revised on 2/12/25. Site Risk Assessment was conducted on 4/22/26 to include buildings and surroundings. There were no adverse conditions that would impact product safety. The site location is appropriate for a food processing facility and outside areas and adjacent land do not interfere with safe and hygienic operations. FDA registration is valid until 12/31/26.

11.1.2 - Building Materials

11.1.2.1 - Floors shall be constructed of smooth, dense, impact-resistant material that can be effectively graded, drained, impervious to liquid, and easily cleaned. Floors shall be sloped to floor drains at gradients suitable to allow the effective removal of all overflow or wastewater under normal working conditions. Where floor drainage is not available, plumbed options to handle overflow or wastewater shall be in place.

Response: Compliant

11.1.2.2 - Drains shall be constructed and located so they can be easily cleaned and not present a hazard.

Response: Compliant

11.1.2.3 - Waste trap system shall be located away from any food handling areas or entrances to the premises.

Response: N/A

Evidence: • The site does not have a waste trap system.

11.1.2.4 - 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 11.2.5). 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

11.1.2.5 - Ducting, conduit, and pipes that convey ingredients, 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. A risk analysis shall be conducted to ensure food contamination risks are mitigated.

Response: Compliant

11.1.2.6 - 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. A risk analysis shall be conducted to ensure food contamination risks are mitigated.

Response: Compliant

Evidence: • No pipes carrying sanitary waste were observed over product lines.

11.1.2.7 - Doors, hatches, and windows and their frames in food processing, handling, or storage areas shall be of a material and construction that meets the same functional requirements as 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

11.1.2.8 - Product shall be processed and handled in areas that are fitted with a ceiling or other acceptable structure that is constructed and maintained to prevent the contamination of products. Drop ceilings, where present, shall be constructed to enable monitoring for pest activity, facilitate cleaning, and provide access to utilities.

Response: Compliant

11.1.2.9 - 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 11.2.5).

Response: Compliant

Summary -

Response: Walls, floors, ceilings, and doors were maintained in acceptable condition and did not pose a food safety risk. Floors are sloped to floor drains in all wet areas. Drains are trapped and covered. The site does not have a waste trap system. Conduit, ducts and piping risk assessment was conducted on 2/26/26. There were no risks determined to exist that would lead to a likelihood of food contamination as observed during the audit. No pipes carrying sanitary waste were observed over product lines. No drop ceilings were observed in the production or storage areas. Stairs and platforms in the processing area were maintained in acceptable condition.

11.1.3 - Lightings and Light Fittings

11.1.3.1 - Lighting in food processing and handling areas and at inspection stations shall be of appropriate intensity to enable the staff to carry out their tasks efficiently and effectively and shall comply with local light-intensity regulations or industry standards.

Response: Compliant

11.1.3.2 - Light fixtures in processing areas, inspection stations, ingredient and packaging storage areas, and all areas where the product is exposed shall be shatterproof, manufactured with a shatterproof covering or fitted with protective covers, and recessed into or fitted flush with the ceiling. Where fixtures cannot be recessed, structures must be protected from accidental breakage, manufactured from cleanable materials, and addressed in the cleaning and sanitation program.

Response: Compliant

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

Response: Compliant

Summary -

Response: Lighting throughout the facility was provided with appropriate intensity to allow employees to perform their jobs effectively. All lights were covered with shatterproof shields. Lighting condition was included on the glass inspection. No damaged lights or light covers were observed during the audit.

11.1.4 - Inspection/ Quality Control Area

11.1.4.1 - If online inspection is required, a suitable area close to the processing line shall be provided for the inspection of product (refer to 2.4.4). The inspection/quality control area shall be provided with facilities that are

suitable for examination and testing of the type of product being handled/processed. 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

Summary -

Response: Product inspection was performed in designated areas. All processing areas were equipped with handwash stations. All inspection and quality control areas have hand sinks and trash bins. All areas are kept clean to prevent product contamination.

11.1.5 - Dust, Insect, and Pest Proofing

11.1.5.1 - 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 effectively insect-proofed and fitted with a self-closing device and proper seals to protect against entry of dust, vermin, and other pests.

Response: Minor

Evidence: • The employee's entrance door was unsecured and accessible from outside.

Root Cause: The employee entrance door's lock did not reliably auto-engage unless fully pushed or pulled shut, so the door could appear closed and pass this check while remaining unsecured. No checklist item, daily or monthly, specifically verified lock engagement. The Monthly Facility GMP Audit (QAS-02-001) includes a check confirming doors remain closed when not actively receiving or moving product; however, this check verifies that the door is physically shut, not that the locking mechanism has engaged Prior version of QAS-02-012 (Rev F) attached, showing the checklist did not include a lock-engagement verification item prior to this finding, alongside QAS-02-001 showing the existing "doors remain closed" item that covers closure but not lock status.

Corrective Action: The employee entrance door locking mechanism was repaired so the door automatically and reliably locks upon closing. In addition to the existing Monthly Facility GMP Audit (QAS-02-001) item confirming doors remain closed when not in use, a new dedicated line item has been added to the Daily Operational Checklist (QAS-02-012), under General/Overall, requiring daily confirmation that exterior doors, including the employee entrance, are physically locked and secured, not just closed. This adds a daily verification layer in addition to the existing monthly check, so a closed-but-unlocked door condition is caught same-day rather than potentially going a full month before detection. Action Evidence: Limble Work Order #7794 (Door Not Working, completed 08/11/2026), confirming the locking mechanism was inspected and repaired. Updated QAS-02-012 Daily Operational Checklist (Rev G) attached, showing the new exterior door lock verification line item.

Verification Of Closeout: Reviewed the updated Daily Operational Checklist and Work Order #7794 to repair the door

Completion Date: August 11, 2026 **Closeout Date:** September 1, 2026

11.1.5.2 - 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 ingress 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

11.1.5.3 - 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 processing equipment. Poison rodenticide bait shall not be used inside ingredients or product storage areas or processing areas where ingredients, packaging, and products are handled, processed, or exposed.

Response: Compliant

Summary -

Response: External doors, windows, and other openings were effectively sealed when closed. Dock doors were kept closed unless being actively used. Interior rodent traps and insect light traps were properly located and did not present a food safety risk. Baits were only used in secure bait stations along the exterior of the facility. MINOR: The employee's entrance door was unsecured and accessible from outside.

11.1.6 - Ventilation

11.1.6.1 - Adequate ventilation shall be provided in enclosed processing and food handling areas. Where appropriate, positive air-pressure systems shall be installed to prevent airborne contamination.

Response: Compliant

11.1.6.2 - All ventilation equipment and devices in product storage and handling areas shall be adequately cleaned as per 11.2.5 to prevent unsanitary conditions.

Response: Compliant

11.1.6.3 - Extractor fans and canopies shall be provided in areas where open cooking operations are carried out or a large amount of steam is generated. Capture velocities shall be sufficient to prevent condensation build-up and to evacuate all heat, fumes, and other aerosols to the exterior via an exhaust hood positioned over the cooker(s).

Response: Compliant

11.1.6.4 - Fans and exhaust vents shall be insect-proofed and located so they do not pose a contamination risk and shall be kept clean.

Response: Compliant

Summary -

Response: Ventilation was adequate and provided in food processing and handling areas. A positive air pressure system was installed to prevent airborne contamination. All ventilation equipment and devices in production and warehouse areas were maintained in acceptable condition. Exhaust fans were maintained in good repair.

11.1.7 - Equipment and Utensils

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

Response: Compliant

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

Response: Compliant

11.1.7.3 - 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

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

Response: Compliant

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

Response: Compliant

11.1.7.6 - 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 as per 11.2.5.1. Bins used for inedible material shall be clearly identified.

Response: Compliant

11.1.7.7 - All equipment and utensils shall be cleaned after use (refer to 11.2.5.1) or at a set and validated frequency to control contamination and be stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination.

Response: Compliant

11.1.7.8 - Vehicles used 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

11.1.7.9 - Non-conforming equipment shall be identified, tagged, and/or segregated for repair or disposed of in a manner that minimizes the risk of inadvertent use, improper use, or risk to the integrity of finished product. Records of the handling, corrective action, and/or disposal of non-conforming equipment shall be maintained.

Response: Compliant

Summary -

Response: All product equipment and utensils were designed and operated to allow for cleaning, inspection, and prevent product contamination. Food contact equipment is stored separately from non-food contact equipment. Cleaning requirements and frequency for equipment and utensils are identified in MSS. Utensils are cleaned daily or as needed to control contamination. Non-conforming equipment was not observed to be a food safety risk.

11.1.8 - Grounds and Roadways

11.1.8.1 - A suitable external environment shall be established, and the effectiveness of the measures shall be monitored and periodically reviewed. The premises, its surrounding areas, storage facilities, machinery, and equipment shall be kept free of waste or accumulated debris, and vegetation shall be controlled so as not to attract pests and vermin or present a food safety hazard to the sanitary operation of the site.

Response: Compliant

11.1.8.2 - Paths, roadways, and loading and unloading areas shall be maintained so as not to present a hazard to the food safety operations of the premises. They shall be adequately drained to prevent the pooling of water. Drains shall be separate from the site drainage system and regularly cleared of debris.

Response: Compliant

11.1.8.3 - Paths from amenities leading to site entrances shall be effectively sealed.

Response: Compliant

Summary -

Response: The exterior premises and grounds were maintained in acceptable condition and monitored on their monthly inspections. No vegetation was observed around the exterior of the facility. No pooling water was observed during the audit. All paths from amenities leading to site entrances were properly sealed and did not pose a food safety risk.

11.2.1 - Repairs and Maintenance

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

Response: Compliant

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

Response: Compliant

11.2.1.3 - Failures of plant and equipment in any food processing, handling, or storage areas shall be documented and reviewed, and their repair(s) incorporated into the maintenance control schedule.

Response: Compliant

11.2.1.4 - Site supervisors shall be notified when maintenance or repairs are to be undertaken in any processing, handling, or storage areas.

Response: Compliant

11.2.1.5 - The maintenance supervisor and the site supervisor shall be informed if any repairs or maintenance 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

11.2.1.6 - Temporary repairs, where required, shall not pose a food safety risk and shall be included in routine inspections (refer to 2.5.4.3) and the cleaning program. There shall be a plan in place to address the completion of temporary repairs to ensure they do not become permanent solutions.

Response: Compliant

11.2.1.7 - Food contact equipment and equipment located over food contact equipment shall be lubricated with food-grade lubricant, and its use shall be controlled to minimize the contamination of the product.

Response: Compliant

11.2.1.8 - Paint used in a food handling or processing area shall be suitable for use, in good condition, and not be used on any product contact surfaces.

Response: Compliant

Summary -

Response: Preventive Maintenance policy was revised on 8/26/24. The maintenance manager is responsible for developing and implementing this program. Limble system is utilized to handle PMs and work orders. PM Records 2026 were reviewed to include but not limited to air compressor- 1/9, chiller- 1/15, metal detectors- 1/26, boiler- 4/8, cooker- 4/17, conveyor belt- 4/29, slicer- 6/29, Tecmatic machine- 7/16, Reiser machine- 7/22, and forklift- 7/13 & 7/27. PM compliance 2025 showed 64% for planned PMs and 35% for unplanned PMs. PM compliance 2025 showed 67% for planned PMs and 33% for unplanned PMs. Temporary repairs were not observed. Food grade and non-food grade lubricants were stored separately in separate cabinets in the maintenance shop. Paint was not used on food contact surfaces.

11.2.2 - Maintenance Staff and Contractors

11.2.2.1 - Maintenance staff and contractors shall comply with the site's personnel and process hygiene requirements (refer to 11.3).

Response: Compliant

11.2.2.2 - 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

11.2.2.3 - 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 appropriate hygiene and sanitation can be conducted and a pre-operational inspection completed prior to the restarting of site operations.

Response: Compliant

Summary -

Response: Maintenance staff and contractors must comply with the site's personnel and process hygiene requirements and sign the agreement prior to work on site. All maintenance and contractors are trained in food safety and GMP procedures and escorted at all times until their work is completed. All tools and debris must be removed after maintenance activity is completed. QA will be informed so appropriate hygiene and sanitation can be conducted and a pre-op inspection completed prior to restarting the operation. GMP Policy for Visitors and Contractors trainings were reviewed to include but not limited to Air Matic- 7/17/25, FOSS- 12/4/24, ChemStation- 9/5/24, Mettler Toledo- 9/10/24, RK Environmental- 8/26/24, Vestis- 9/8/25, Express Heating- 9/5/24 and DR Tech- 7/15/26.

11.2.3 - Calibration

11.2.3.1 - 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 as appropriate.

Response: Compliant

11.2.3.2 - 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.

Response: Compliant

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

Response: Compliant

11.2.3.4 - Procedures shall be documented and implemented to address the resolution of potentially affected products when measuring, testing, or inspection equipment is found to be out of calibration.

Response: Compliant

11.2.3.5 - Calibrated measuring, testing, and inspection equipment shall be protected from damage and unauthorized adjustment or use.

Response: Compliant

11.2.3.6 - A directory of measuring, testing, and inspection equipment that require calibration and records of the calibration tests shall be maintained.

Response: Compliant

Summary -

Response: Calibration Program was revised on 1/30/26 to define the inspection, measuring, and test equipment that requires calibration or verification, establish calibration frequency, identify responsible parties, and ensure calibration activities are traceable to recognized national or international standards. Scale Verification policy was revised on 4/29/26. QA conducts daily pre-op scale verification. pH meter policy was revised on 7/24/25 to outline the proper calibration, verification and use of pH and ion meters. Thermometer Verification policy was revised on 7/24/25 to ensure that the appropriate type of thermometer is used and that is verified for accuracy. Liquid in Glass Thermometer was calibrated on 6/17/26. Scales were calibrated by the State of NJ Office of Weights & Measures on 12/10/25. Scales were calibrated by Atlantic Scale on 1/22/26, 4/16/26 and 7/16/26. Metal detectors were calibrated by Fortress on 7/17/26. Daily pH Meter Calibration Logs, Daily Scale Verification Logs, and Thermometer Calibration Verification Logs on 1/12-14/26, 4/1-3/26, and 7/14-16/26 were reviewed.

11.2.4 - Pest Prevention

11.2.4.1 - 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 the identification, location, number, and type of applied pest control/monitoring devices on a site map; vii. List the chemicals used. The chemicals 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 to take 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 to identify trends.

Response: Compliant

11.2.4.2 - 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 2.3.2.8), 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

11.2.4.3 - Pest activity risks shall be analyzed and recorded. Inspections for pest activity shall be conducted 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

11.2.4.4 - 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 shall be investigated and resolved. Records shall be kept of the disposal, investigation, and resolution.

Response: Compliant

11.2.4.5 - Pesticides shall be clearly labeled and stored per 11.6.4 if kept on-site.

Response: N/A

Evidence: • Pesticides were not stored on site.

11.2.4.6 - No animals shall be permitted on-site in food handling and storage areas.

Response: Compliant

Summary -

Response: Pest Prevention Program was revised on 1/3/25. RK Environmental conducts bi-weekly service of 54 IRTs & 10 ILTs and 28 RBS on a monthly basis. IPM Service Agreement was reviewed on 1/12/26 to include scope of service. The device map was reviewed on 1/12/26 to include the locations of all PC devices. ILT bulbs were changed on 3/23/26. 2026 Approved Pesticide List was on file including SDS and labels. COI is good until 10/1/26. Pesticide Business License and Pesticide Operator License expire on 10/31/26. GMP Training was completed on 9/22/25. Service Reports from January to July 2026 and Pest Activity Trend Reports from January to June 2026 were maintained. Annual IPM Assessment was conducted on 6/30/26. Pesticide Usage Logs from January to July 2026 were maintained. Pesticides were not stored on site.

11.2.5 - Cleaning and Sanitation

11.2.5.1 - The methods and responsibility for the effective cleaning of the food handling and processing equipment and environment and storage areas 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 the cleaning; v. Validation of the cleaning procedures for food contact surfaces (including CIP); 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

11.2.5.2 - Detergents and sanitizers shall be suitable for use in a food manufacturing 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 stored as outlined in element 11.6.4; iv. Safety Data Sheets (SDS) are provided for all detergents and sanitizers purchased; and v. Only trained staff handle sanitizers and detergents.

Response: Minor

Evidence: • One bottle of sanitizer was not labeled in the processing area.

Root Cause: Root Cause: The sanitizer bottle found on Line 3 was a spray bottle refilled from a larger container without being labeled with product identity at the time of transfer. Employees receive annual training on proper chemical storage and handling, including labeling requirements, so this was not a training gap but an isolated human oversight during a chemical transfer. Chemical labeling was verified monthly through QAS-02-016 (Monthly Facility GMP Audit), but no daily pre-operational checkpoint existed to verify that secondary/refilled containers were labeled before production start, allowing an unlabeled bottle to go undetected between monthly checks. Root Cause Evidence: Prior version of QAS-02-025 (Rev A, Supersedes 01/10/2025) attached, showing the pre-operational equipment release process did not include a chemical container labeling checkpoint prior to this finding. Action Evidence (updated): Photo of the corrected, labeled bottle. Rootwurks training records showing completed retraining on chemical safety and labeling for affected employees. Revised QAS-02-025 (Rev B, 08-11-2026) attached, showing new Section 5, Chemical Container Labeling Check

Corrective Action: The unlabeled sanitizer spray bottle found on Line 3 was immediately labeled with product identity upon discovery. In addition, QAS-02-025 (Pre-Operational Inspection & Equipment Release Form) has been revised to include a new dedicated Section 5, Chemical Container Labeling Check, requiring daily confirmation prior to production start on each line that all chemical containers, including secondary/refilled spray bottles, are properly labeled with product identity. This check is now a condition of equipment release for production, in addition to the existing monthly chemical labeling verification under QAS-02-016 (Monthly Facility GMP Audit).Employees in the area, and all employees who handle chemicals, received retraining on proper chemical safety, including labeling requirements, delivered through Rootwurks. Action Evidence (updated): Rootwurks training records showing completed retraining on chemical safety and labeling for affected employees. Revised QAS-02-025 (Rev B, 08-11-2026) attached, showing new Section 5, Chemical Container Labeling Check.

Verification Of Closeout: Reviewed the updated Pre-Operational Inspection & Equipment Release Form, Monthly GMP Internal Inspection Checklist, chemical safety training certificates, and photo of the labeled sanitizer bottle.

Completion Date: August 11, 2026 **Closeout Date:** September 2, 2026

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

Response: Compliant

11.2.5.4 - Cleaning-in-place (CIP) systems, where used, shall not pose a chemical contamination risk to raw materials, ingredients, or product. CIP parameters critical to assuring effective cleaning shall be defined, monitored, and recorded (e.g., chemical and concentration used, contact time, and temperature). CIP equipment,

including spray balls, shall be maintained, and any modifications to CIP equipment shall be validated. Personnel engaged in CIP activities shall be effectively trained.

Response: Compliant

11.2.5.5 - 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 areas, product handling equipment, and storage areas as well as the tools themselves.

Response: Compliant

11.2.5.6 - Suitably equipped areas shall be designated for cleaning product containers, knives, cutting boards, and other utensils used by staff. The areas for these cleaning operations shall be controlled so they do not interfere with manufacturing operations, equipment, or product. Racks and containers for storing cleaned utensils shall be provided as required.

Response: Compliant

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

Response: Compliant

11.2.5.8 - 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

11.2.5.9 - 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 Program was in place to include the methods and responsibilities for cleaning and sanitation of processing areas, equipment, environment, storage areas, and staff amenities. SSOPs were reviewed to include but not limited to CIP systems, metal detectors, brine tank, slicers, cooling tanks, and cooker machines. Cleaning & Sanitizing Risk Assessment was conducted on 5/20/26 to include CIP system and manual cleaning of equipment and surfaces. Color Coding policy was revised on 7/29/26 to ensure utensils and cleaning items used to clean various areas are used for specific areas only to minimize cross contamination. Records on 1/12-14/26, 4/1-3/26, and 7/14-16/26 were reviewed to include Daily Sanitation Log, Daily Pre-Operational Checklist (ATP swabs), Daily Pre-Operational Inspection Equipment Release, Chemical Usage Log, CIP Performance Log (ATP swabs). MINOR: One spray bottle of sanitizer was not labeled in the processing area.

11.3.1 - Personnel Welfare

11.3.1.1 - 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 the processing or packing of food or enter storage areas where food is exposed. Medical Amendment added: Code Amendment #1A medical screening procedure

shall be in place for all employees, visitors and contractors who handle exposed product or food contact surfaces.

Response: Compliant

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

Response: Compliant

11.3.1.3 - Personnel with exposed cuts, sores, or lesions shall not engage in handling or processing exposed products or handling primary (food contact) packaging or touching food contact surfaces. Minor cuts or abrasions on exposed parts of the body shall be covered with a colored, metal-detectable bandage or an alternative suitable waterproof and colored dressing.

Response: Compliant

Summary -

Response: Employees who are ill or sick are not allowed in the processing areas. Personnel were trained to report cuts or sores to their supervisor. All minor cuts must be covered with appropriate bandage. No employees with wounds or illness were observed working in the processing areas during the audit. Bloodborne pathogen training is conducted annually.

11.3.2 - Handwashing

11.3.2.1 - All personnel shall have clean hands, and hands shall be washed by all staff, contractors, and visitors: i. On entering food handling or processing areas; 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 product, or contaminated material.

Response: Compliant

11.3.2.2 - Handwashing stations shall be provided adjacent to all personnel access points and in accessible locations throughout food handling and processing areas as required.

Response: Compliant

11.3.2.3 - Handwashing 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 contained within a fixed dispenser; iii. Paper towels in a hands-free cleanable dispenser; and iv. A means of containing used paper towels.

Response: Compliant

11.3.2.4 - The following additional facilities shall be provided in high-risk areas: i. Hands-free operated taps; and ii. Hand sanitizers.

Response: Compliant

11.3.2.5 - Signage in appropriate languages instructing people to wash their hands before entering the food processing areas shall be provided in a prominent position in break rooms, at break room exits, toilet rooms, and in outside eating areas, as applicable.

Response: Compliant

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

Response: Compliant

Summary -

Response: Employees are required to follow handwashing practices to prevent product contamination. Handwashing stations were provided across the facility. The handwash sinks were made of stainless steel, hands-free, and equipped with warm water, liquid soap, single-use paper towels, trash bin, sanitizer, and handwashing signage. Employees were observed washing their hands upon entry to the processing areas and before putting on gloves. Clean Hands Sheet Schedule Records on 1/12-14/26, 4/1-3/26, and 7/14-16/26 were reviewed.

11.3.3 - Clothing and Personal Effects

11.3.3.1 - The site shall undertake a risk analysis to ensure that the clothing and hair policy protects materials, food, and food contact surfaces from unintentional microbiological or physical contamination.

Response: Compliant

11.3.3.2 - Clothing worn by staff engaged in handling food shall be maintained, stored, laundered, and worn so it does not present a contamination risk to products.

Response: Compliant

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

Response: Compliant

11.3.3.4 - Excessively soiled uniforms shall be changed or replaced when they present a product contamination risk.

Response: Compliant

11.3.3.5 - 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 in designated sealed containers in personnel lockers. They should not be placed or stored on packaging, ingredients, product, or equipment.

Response: Compliant

11.3.3.6 - Protective clothing shall be manufactured from material that will not pose a food safety threat and is easily cleaned. All protective clothing shall be cleaned after use, or at a frequency to control contamination, and stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination.

Response: Compliant

11.3.3.7 - Racks shall be provided for the temporary storage of protective clothing when staff leave the processing area and shall be provided nearby or adjacent to the personnel access doorways and handwashing facilities.

Response: Compliant

11.3.3.8 - Jewelry and other loose objects shall not be worn or taken into a food handling or processing operation or into any area where food is exposed. Wearing plain bands with no stones, prescribed medical alert bracelets, or

jewelry accepted for religious or cultural reasons can be permitted, provided these items are properly covered and do 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: Clothing Personal Effects Risk Assessment was conducted on 4/2/26 to include risk item, potential hazard, significance score, control measures and preventive control. Vestis provides clean lab coats and uniforms to employees. Employees wear disposable hairnets, gloves, and beard nets (if applicable) and are changed as needed. Racks were provided to hang their smocks. Jewelry is not permitted in the processing areas. All jewelry must be removed before entering the production areas except for Medical Alert jewelry. No employees were observed wearing jewelry in the processing areas.

11.3.4 - Visitors

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

Response: Compliant

11.3.4.2 - All visitors, including management staff, shall be required to remove jewelry and other loose objects in accordance with the facilities Good Manufacturing Practices and 11.3.3.8. All visitors shall wear suitable clothing and footwear when entering any food processing and handling area.

Response: Compliant

11.3.4.3 - Visitors exhibiting visible signs of illness shall be prevented from entering areas in which food is handled and processed.

Response: Compliant

11.3.4.4 - 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

Summary -

Response: Visitor policy was in place to establish, document, and implement a system to control visitors and sub-contractors. Visitors must follow GMP, PPE, safety security, and handwashing requirements. Visitors are required to sign in upon arrival and read the GMP policy. Visitors exhibiting signs of illness were not allowed in food processing areas.

11.3.5 - Staff Amenities (change rooms, toilet, break rooms)

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

Response: Compliant

11.3.5.2 - Change rooms shall be provided to enable staff and visitors to change into and out of protective clothing as required. Change rooms shall be kept clean.

Response: Compliant

11.3.5.3 - High-risk change areas shall be provided for staff engaged in the processing of high-risk foods or processing operations in which clothing can be soiled.

Response: Compliant

11.3.5.4 - Provision shall be made for staff to store their street clothing and personal items separate from clean uniforms, food contact zones, food, and packaging storage areas.

Response: Compliant

11.3.5.5 - Where required, a sufficient number of showers shall be provided for use by staff.

Response: N/A

Evidence: • Showers were not required on site.

11.3.5.6 - Toilet rooms shall be: i. Designed and constructed so that they are accessible to staff and separate from any processing and food handling operations; ii. Accessed from the processing 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; v. Located inside or nearby areas for storing protective clothing, outer garments, and other items while using the facilities; and vi. Kept clean and tidy. Tools/equipment used for cleaning toilet rooms shall not be used to clean processing areas.

Response: Compliant

11.3.5.7 - 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 in accordance with regulations.

Response: Compliant

11.3.5.8 - Handwashing basins shall be provided immediately outside or inside the toilet room and designed as outlined in 11.3.2.3.

Response: Compliant

11.3.5.9 - Separate break rooms shall be provided away from food contact/handling zones.Break rooms shall be: i. Ventilated and well lit; ii. Provided with adequate tables and seating to cater for the maximum number of staff 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 staff to store or heat food and to prepare non-alcoholic beverages if required; and v. Kept clean and free from waste materials and pests.

Response: Compliant

11.3.5.10 - 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: N/A

Evidence: • The site does not have an outside eating area.

Summary -

Response: Cleaning procedures for staff amenities were included in their sanitation program. Lunchroom, restrooms, and locker rooms were provided with appropriate lighting and ventilation. Lockers were available to store street clothing and personal items. No tools or food may be stored in lockers. Showers were not required on site. Restrooms are located throughout the facility and separate from production and handling areas. Sanitary drainage is identified on the facility map and it is not connected to other drains in the facility.

All restrooms were provided with handwashing basins and signs. The lunchroom was located away from the processing areas and was equipped with microwaves, sink and refrigerator. These amenities were maintained in acceptable condition. The site does not have an outside eating area.

11.4.1 - Staff Engaged in Food Handling and Processing Operations

11.4.1.1 - All personnel engaged in any food handling, preparation, or processing operations shall ensure that products and materials are handled and stored in such a way as to prevent damage or product contamination. They shall comply with the following processing practices: i. Personnel entry to processing areas shall be through the personnel access doors only; ii. All doors are to be kept closed. Doors shall not be open for extended periods when access is required for waste removal or receiving of product/ingredient/packaging; iii. Packaging, product, and ingredients 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 processing area on a regular basis and not left to accumulate; and v. All wash down and compressed air hoses shall be stored on hose racks after use and not left on the floor.

Response: Compliant

11.4.1.2 - Personnel working in or visiting food handling or processing operations shall ensure that: i. Staff shall not eat or taste any product being processed in the food handling/contact zones, except as noted in element 11.4.1.4; ii. The wearing of false fingernails, false eyelashes, eyelash extensions, long nails, or fingernail polish is not permitted when handling exposed food; iii. Hair restraints and beard covers, where applicable, shall be used in areas where product is exposed. iv. Smoking, chewing, eating, or spitting is not permitted in areas where product is produced, stored, or otherwise exposed. v. Drinking water is permissible only under conditions that prevent contamination or other food safety risks from occurring. Drinking water containers in production and storage areas shall be stored in clear, covered containers, and in designated areas away from raw materials, packaging, tools, or equipment storage.

Response: Compliant

11.4.1.3 - The flow of personnel in food processing and handling areas shall be managed such that the potential for contamination is minimized.

Response: Compliant

11.4.1.4 - In circumstances where it is necessary to undertake sensory evaluations in a food handling/contact zone, the site shall implement 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 processing equipment.

Response: N/A

Evidence: • Sensory evaluations were not conducted in food handling areas.

Summary -

Response: Personnel enter the processing areas through designated access doors. Entry and exit doors to the facility from the outside are self-closing and kept closed when not in use. Waste is removed from production on a daily basis or as needed if containers are full. Employees were wearing proper PPE and adhered to GMP protocols. Wash down hoses were properly stored on hose racks after use. Personnel and product flows were

followed to minimize cross contamination. Personnel Flow Risk Assessment was conducted on 4/22/26. Sensory evaluations were not conducted in food handling areas.

11.5.1 - Water Supply

11.5.1.1 - Adequate supplies of potable water drawn from a known clean source shall be provided for water used as an ingredient during processing operations and for cleaning the premises and equipment. The source of potable water shall be identified as well as on-site storage (if applicable) and reticulation within the facility.

Response: Compliant

11.5.1.2 - 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

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

Response: Compliant

11.5.1.4 - 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

11.5.1.5 - 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 backflow or back-siphonage.

Response: N/A

Evidence: • The site does not use non-potable water.

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

Response: N/A

Evidence: • The site does not store water.

Summary -

Response: Potable water is supplied by the City of Secaucus. Contingency Water Plan policy was revised on 2/26/26 to describe the process for securing potable water in the event the water is deemed contaminated or unusable. The site will activate its bulk water supply contract with A Clear Alternative Co. Backflow prevention devices were inspected by Associated Fire Protection on 4/11/26. The site does not use non-potable water. The site does not store water.

11.5.2 - Water Treatment

11.5.2.1 - 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: • The facility does not treat water.

11.5.2.2 - Water used as an ingredient in processing or for cleaning and sanitizing equipment shall be tested and, if required, treated to maintain potability (refer to 11.5.2.1).

Response: N/A

Evidence: • The facility does not treat water.

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

Response: N/A

Evidence: • The facility does not treat water.

Summary -

Response: The site does not treat water.

11.5.3 - Water Quality

11.5.3.1 - 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 food processing aid; v. Cleaning food contact surfaces and equipment; vi. The manufacture of ice; orvii. 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

11.5.3.2 - 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 or cleaning or from within the site. The frequency of analysis shall be risk-based and at a minimum annually.

Response: Compliant

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

Response: Compliant

Summary -

Response: Water, Ice, and Air Supply policy was revised on 2/26/26 to describe the adequate supplies of potable water and compressed water, its clean source, and how it is monitored for portability and cleanliness. Water Testing Results from January to July 2026 showed acceptable results for APC, coliform, yeast and mold. Water testing was conducted on 7/2/26 to include acceptable results for heavy metals. Annual Water Quality Report 2025 showed meeting the national potability standards.

11.5.4 - Ice Supply

11.5.4.1 - Ice provided for use during processing operations, as a processing aid, or an ingredient shall comply with 11.5.3.1.

Response: N/A

Evidence: • Ice was not manufactured on site or used in their process.

11.5.4.2 - 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 tested as appropriate.

Response: N/A

Evidence: • Ice was not manufactured on site or used in their process.

11.5.4.3 - Ice rooms and receptacles shall be constructed of materials as outlined in element 11.1.2 and designed to minimize contamination of the ice during storage, retrieval, and distribution.

Response: N/A

Evidence: • Ice was not manufactured on site or used in their process.

Summary -

Response: Ice was not manufactured on site or used in their process.

11.5.5 - Air and Other Gasses

11.5.5.1 - 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 does not come in contact with food or food contact surfaces.

11.5.5.2 - Compressed air systems and systems used to store or dispense other gases 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: N/A

Evidence: • Compressed air does not come in contact with food or food contact surfaces.

Summary -

Response: Compressed air does not come in contact with food or food contact surfaces.

11.6.1 - Receipt, Storage and Handling of Goods

11.6.1.1 - The site shall document and implement an effective storage plan that allows for the safe, hygienic receipt and storage of raw materials (i.e., frozen, chilled, and ambient), ingredients, packaging, equipment, and chemicals.

Response: Compliant

11.6.1.2 - Controls shall be in place to ensure all ingredients, raw materials, processing aids, and packaging are received and stored properly to prevent cross-contamination risks. Unprocessed raw materials shall be received and stored separately from processed raw materials to avoid cross-contamination risk.

Response: Compliant

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

Response: Compliant

11.6.1.4 - Procedures shall be in place to ensure that all ingredients, materials, work- in-progress, rework, and finished product are utilized within their designated shelf-life.

Response: Compliant

11.6.1.5 - Where raw materials, ingredients, packaging, equipment, and chemicals 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 are no risks to the integrity of those goods, no potential for contamination or adverse effect on food safety.

Response: N/A

Evidence: • The site does not utilize offsite storage facilities.

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

Response: N/A

Evidence: • The site does not utilize offsite storage facilities.

Summary -

Response: The site has implemented an effective storage plan to store raw & packaging materials, ingredients, equipment and chemicals. Raw materials and finished product are rotated based on the FIFO system. There were no expired products observed during the audit. The site does not utilize offsite storage facilities.

11.6.2 - Cold Storage, Freezing and Chilling of Foods

11.6.2.1 - 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 be easily accessible for inspection and cleaning.

Response: Compliant

11.6.2.2 - Sufficient refrigeration capacity shall be available to chill, freeze, store chilled, or store frozen the maximum anticipated throughput of product with allowance for periodic cleaning of refrigerated areas.

Response: Compliant

11.6.2.3 - The site shall have a written procedure for monitoring temperatures, including the frequency of checks, and corrective actions, if the temperature is out of specification. Freezing, chilling, and cold storage rooms shall be fitted with temperature monitoring equipment that is 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

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

Response: Compliant

Summary -

Response: The storage cooler had an adequate cooling capacity and was maintained in a sanitary manner as

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observed during the facility assessment. The storage temperature was monitored and verified as required. Cooler Temperature Logs in January, April and July 2026 were reviewed. Condensate and defrost were discharged into the drainage system.

11.6.3 - Storage of Dry Ingredients, Packaging, and Shelf Stable Packaged Goods

11.6.3.1 - Rooms used for the storage of product ingredients, packaging, and other dry goods shall be located away from wet areas and constructed to protect the product from contamination and deterioration and prevent packaging from becoming a harborage for pests or vermin.

Response: Compliant

11.6.3.2 - Racks provided for the storage of packaging shall be constructed of impervious materials and designed to enable cleaning and inspection of the floors and behind the racks. Storage areas shall be cleaned at a pre-determined frequency.

Response: Compliant

Summary -

Response: Dry storage areas were separated from wet areas of the facility. Metal racks were provided to store ingredients and packaging materials. The dry storage areas were maintained in good condition. No pest harborage areas were observed underneath and behind the racking.

11.6.4 - Storage of Hazardous Chemicals and Toxic Substances

11.6.4.1 - Hazardous chemicals and toxic substances with the potential for food contamination shall be: i. Clearly labeled, identifying and matching the contents of their containers; ii. Included in a current register of all hazardous chemicals and toxic substances that are stored on-site; and iii. Supplemented with current Safety Data Sheets (SDS) made available to all staff.

Response: Compliant

11.6.4.2 - Storage of hazardous chemicals and toxic substances shall be: i. Located in an area with appropriate signage indicating that the area is for hazardous storage; ii. Controlled, lockable, and accessible only by personnel trained in the storage and use of chemicals; iii. Adequately ventilated;iv. Stored where intended and not comingled (e.g., food versus non-food grade);v. Designed such that pesticides, rodenticides, fumigants, and insecticides are stored separately from sanitizers and detergents; and vi. Stored in a manner that prevents a hazard to finished product or product contact surfaces. Processing utensils and packaging shall not be stored in areas used to store hazardous chemicals and toxic substances.

Response: Compliant

11.6.4.3 - Hazardous chemicals and toxic substances shall be correctly labeled and: i. Used only according to manufacturers' instructions; ii. Controlled to prevent contamination or a hazard to raw and packaging material, work-in-progress, finished product, or product contact surfaces; iii. Returned to the appropriate storage areas after use; and iv. Be compliant with national and local legislation.

Response: Compliant

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

personnel.

Response: Compliant

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

Response: Compliant

11.6.4.6 - The site shall dispose of empty, obsolete, and unused chemicals, pesticides, toxic substances, and containers in accordance with requirements and ensure that primary containers are: i. Not reused; ii. Segregated and securely stored prior to collection; and iii. Disposed through an approved vendor.

Response: Compliant

11.6.4.7 - 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 PPE, spillage kits, and cleaning equipment.

Response: Compliant

Summary -

Response: All chemicals are approved for food manufacturing facility and its intended use. Chemicals were stored in locked and secured chemical cages which are accessible only by authorized personnel. A signage is used to indicate the area is hazardous storage. Packaging supplies or utensils were not stored in the chemical cabinets. Daily chemical supplies were labeled properly and did not pose a threat to employees. The site uses ChemStation chemicals. Chemical list, SDS, labels, LOG, and inventory were maintained to include but not limited ChlorSan 0115, Caustic CIP 40561 and Alpet E3 Plus. Chemical inventory was maintained. Chemical safety training was conducted in July 2026. ChemStation Safety Chart was on file. Pesticides were not stored on site. Spill kit and eye wash station were provided.

11.6.5 - Loading, Transport, and Unloading Practices

11.6.5.1 - The practices applied during loading, transport, and unloading of food shall be documented, implemented, and designed to maintain appropriate storage conditions and product integrity. Foods shall be loaded, transported, and unloaded under conditions suitable to prevent cross-contamination.

Response: Compliant

11.6.5.2 - Vehicles (e.g., trucks/vans/containers) used for transporting food within the site and from the site 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

11.6.5.3 - Vehicles (e.g., trucks/vans/containers) shall be secured from tampering using seals or other agreed-upon and acceptable devices or systems.

Response: Compliant

11.6.5.4 - Loading and unloading docks shall be designed to protect the product during loading and unloading. Loading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining product and package integrity during loading and transport.

Response: Compliant

11.6.5.5 - Refrigerated units shall maintain the product at the required temperature. The unit's temperature settings shall be set, checked, and recorded before loading, and the product temperature shall be recorded at regular intervals during loading, as applicable.

Response: Compliant

11.6.5.6 - The refrigeration unit shall be operational at all times and checks completed of the unit's operation, the door seals, and the storage temperature at regular intervals during transit.

Response: Compliant

11.6.5.7 - On arrival, prior to opening the doors, the food transport vehicle's refrigeration unit's storage temperature settings and operating temperature shall be checked and recorded. Unloading shall be completed efficiently, and product temperatures shall be recorded at the start of unloading and regular intervals during unloading.

Response: Compliant

11.6.5.8 - Unloading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining product and package integrity.

Response: Compliant

Summary -

Response: Storage and Transportation policy was revised on 7/30/25 to describe the process and responsibility of the shipping and receiving staff regarding incoming products, products being shipped, products in coolers, staging products, and protecting products from abuse. Records on 1/12-14/26, 4/1-3/26, and 7/14-16/26 were reviewed to include Drivers Daily Sign In / Out Log, Outbound Truck – Trailer Box Inspection (Product temp, truck temp, trailer condition), Inbound Receiving Inspection Log (Lot #, trailer seal #, trailer temp, trailer condition).

11.7.1 - High-Risk Processes

11.7.1.1 - The processing of high-risk food shall be conducted under controlled conditions, such that sensitive areas, in which the high-risk food has undergone a "kill" step, a "food safety intervention" or is subject to post-process handling, are protected/segregated from other processes, raw materials, or staff who handle raw materials, to ensure cross-contamination is minimized.

Response: Compliant

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

Response: Compliant

11.7.1.3 - Areas in which high-risk processes are conducted shall only be serviced by staff dedicated to that function.

Response: Compliant

11.7.1.4 - Staff engaged in high-risk areas shall change into clean clothing and footwear or temporary protective outerwear when entering high-risk areas. Staff access points shall be located, designed, and equipped to enable staff to change into the distinctive protective clothing and practice a high standard of personal hygiene to prevent

product contamination.

Response: Compliant

11.7.1.5 - Product transfer points shall be located and designed, so they do not compromise high-risk segregation and minimize the risk of cross-contamination.

Response: Compliant

Summary -

Response: The pasteurized curd is processed in a closed system and protected from other processes and raw materials to ensure cross contamination is minimized. The site complies with FDA requirements. Air Quality Testing policy was revised on 6/10/26 to describe the method for monitoring air quality for APC and rapid yeast & mold using a passive petrifilm plates hung in the production area. Ambient air testing is conducted monthly. Air Testing Results from January to July 2026 showed acceptable results for yeast and mold. Product transfer points did not pose a risk to food safety.

11.7.2 - Thawing of Food

11.7.2.1 - Thawing of food shall be undertaken in equipment and rooms appropriate for the purpose. Equipment for water thawing shall be continuous flow to ensure the water exchange rate and temperature do not contribute to product deterioration or contamination. Water overflow shall be directed into the floor drainage system and not onto the floor or shall be appropriately plumbed.

Response: N/A

Evidence: • The site does not perform thawing activities.

11.7.2.2 - Air thawing facilities shall be designed to thaw food under controlled conditions at a rate and temperature that does not contribute to product deterioration or contamination.

Response: N/A

Evidence: • The site does not perform thawing activities.

11.7.2.3 - Provision is to be made for the containment and regular disposal of used cartons and packaging from thawed product so that there is no risk to the product.

Response: N/A

Evidence: • The site does not perform thawing activities.

Summary -

Response: The site does not perform thawing activities.

11.7.3 - Control of Foreign Matter Contamination

11.7.3.1 - The responsibility and methods used to prevent foreign matter contamination of the product shall be documented, implemented, and communicated to all staff. Inspections shall be performed (refer to 2.5.4.3) to ensure plant and equipment remain in good condition and equipment has not become detached or deteriorated and is free from potential contaminants.

Response: Compliant

11.7.3.2 - Containers, equipment, and other utensils made of glass, porcelain, ceramics, laboratory glassware, or

other similar materials shall not be permitted in food processing /contact zones (except where the product is contained in packaging made from these materials, or measurement instruments with glass dial covers are used, or MIG thermometers are required under regulation). Where glass objects or similar material are required in food handling/contact zones, they shall be listed in a glass inventory, including details of their location and condition.

Response: Compliant

11.7.3.3 - Regular inspections of food handling/contact 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

11.7.3.4 - Glass instrument dial covers on processing equipment and MIG thermometers shall be inspected at the start of each shift to confirm they have not been damaged.

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

11.7.3.8 - Knives and cutting instruments used in processing 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

11.7.3.9 - Gaskets, rubber impellers, 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 Matter Contamination policy revised on 4/29/26 to remove risk of potential foreign matter contamination and to eliminate or minimize the risk of foreign materials entering the product. Inspections shall be performed to ensure the plant and equipment remain in good condition and equipment has not detached or deteriorated and is free from potential contaminants. Glass and Brittle Plastic policy was revised on 5/27/26 to ensure the integrity of their products and to protect their products and personnel from the dangers of glass, brittles plastics and ceramics. Glass and Brittle Logs from January to July 2026 were maintained. Knife Blade policy was revised on 7/29/26 to establish positive control and accountability of knife blades used in the production area and to prevent broken or discarded blades from compromising customer product safety. Knife Log is utilized accordingly. Wooden pallets were maintained in good repair. Gaskets were

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monitored during pre-op inspection.

11.7.4 - Detection of Foreign Objects

11.7.4.1 - 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: Compliant

11.7.4.2 - Where detection and/or removal systems are used, the site shall establish limits for detection, based on a risk assessment of the product and its packaging, and identify the location(s) of the detector(s) in the process.

Response: Compliant

11.7.4.3 - 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: Minor

Evidence: • The metal detectors were not monitored hourly (e.g. 12:35 – 2:35 – 3:58) based on the Metal Detection Logs reviewed.

Root Cause: Metal detector checks were not being consistently performed and documented at the required hourly interval, resulting in gaps in the Metal Detection Log. The prior version of the log did not clearly define an acceptable time tolerance for hourly checks, did not require a changeover-triggered check, and did not have a mechanism requiring missed checks to be flagged and explained rather than left blank, allowing gaps to go unaddressed at the time they occurred. Prior version of QAS-02-041–044 attached, showing the log format did not specify a check tolerance window or require documentation of missed checks. Metal Detection Log records reviewed during the SQF audit showing the identified gaps.

Corrective Action: QA staff were retrained on the importance of completing metal detector checks on schedule and not missing or leaving check intervals undocumented. In addition, QAS-02-041 through 044 (Packing Verification & Metal Detection Log, all lines and Boxing) were revised to Rev B, adding an explicit hourly check requirement with a ±15 minute tolerance window from the top of the hour, plus mandatory checks at every product changeover. The revised form also requires that any missed or late check not be left blank; it must be documented as "MISSED — see NC #__" in the Time column and logged in a new built-in Non-Conformances, Missed Checks & Corrective Actions section on the same sheet, capturing time, description, root cause, corrective action, and QA initials at the point of occurrence. In addition, missed or late check entries will be reviewed monthly as part of the standing Management Review process (QAS-01-008) to identify any recurring pattern by line, shift, or time of day, and will be escalated to CAPA (QAS-01-027) if a trend is identified. Action Evidence: Revised QAS-02-041–044 (Rev B, 08-13-2026) attached, showing the hourly/±15 min tolerance requirement, changeover trigger, missed-check documentation instruction, and embedded NC log section, Revised the SOP QAS-01-008 Management Review that shows the monthly trend review now built into the Management Review.

Verification Of Closeout: Reviewed the updated Packing Verification & Metal Detection Log to include the hourly check requirement

Completion Date: August 13, 2026 **Closeout Date:** September 1, 2026

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

Response: Compliant

11.7.4.5 - 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: Compliant

Summary -

Response: Metal Detector Procedure was revised on 6/11/26 to ensure food safety and quality of their products and to detect any metallic foreign material from reaching their customer and to ensure products meet or exceed FDA requirements for physical hazards in food. Metal detection is identified as a PPC in their food safety plan. Metal detectors are monitored at start up, hourly and at the end of the run. Metal detectors were calibrated by Fortress on 7/17/26. Metal detectors were successfully tested in lines # 2 and # 3 with reject mechanisms. Metal Detectable Band Aid & Earplug Verification Log on 6/24/26 was reviewed. Metal Detection Logs on 1/12-14/26, 4/1-3/26, and 7/14-16/26 were reviewed. MINOR: The metal detectors were not monitored hourly (e.g. 12:35 – 2:35 – 3:58) based on the Metal Detection Logs reviewed.

11.8.1 - Waste Disposal

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

Response: Compliant

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

Response: Compliant

11.8.1.3 - Waste and overflow water from tubs, tanks, and other equipment shall be discharged directly to the floor drainage system or by an alternative method that meets local regulatory requirements.

Response: Compliant

11.8.1.4 - Trolleys, vehicle waste disposal equipment, collection bins, and storage areas shall be maintained in a serviceable condition, cleaned, and sanitized regularly to prevent the attraction of pests and other vermin.

Response: Compliant

11.8.1.5 - Adequate provision shall be made for the disposal of all solid processing waste, including trimmings, inedible material, and used packaging.

Response: Compliant

11.8.1.6 - Where applicable, a documented procedure shall be in place for the controlled disposal of trademarked materials waste considered high-risk for handling or other reasons. Where a contracted disposal service is used, the disposal process shall be reviewed regularly to confirm compliance.

Response: Compliant

11.8.1.7 - 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: N/A

Evidence: • The site does not handle inedible waste for animal feed.

11.8.1.8 - Waste held on-site prior to disposal shall be stored in a separate storage facility that is suitably insect proofed and located where it does not present any hazards.

Response: Compliant

11.8.1.9 - Adequate provision shall be made for the disposal of all liquid waste from processing and food handling areas. Liquid waste shall either be removed from the processing environment continuously or held in a designated storage area in lidded containers prior to disposal where it does not present any hazards.

Response: Compliant

11.8.1.10 - Reviews of the effectiveness of waste management shall form part of regular site inspections (refer to 2.5.4.3), and the results of these inspections shall be included in the relevant inspection reports.

Response: Compliant

Summary -

Response: Waste Management policy was revised on 2/12/25 to define methods of waste collection, handling, and storage prior to removal from the premises by an approved party. All waste is collected and placed in the labeled containers with cover throughout the facility. All waste disposal bins and areas are maintained daily in a clean and sanitary manner. Direct waste handles waste removal on a weekly basis. Daily disposable of trademarked or packaging materials and finished products shall be discarded appropriately. The site does not handle inedible waste for animal feed. Waste management will be monitored during monthly GMP inspections.