

Ottens Flavors Quality Policy

Introduction

This manual between Ottens Flavors and all Suppliers outlines the quality requirements and expectations. This manual is supplied in addition to all Ottens Flavor’s terms and conditions contained on Ottens Flavor’s purchase orders and confidentiality agreements. This manual is also a tool to guide suppliers through Ottens Flavor’s policies for shipping material to our facilities and customers. ***As Acknowledgement of our Purchase Orders, you are agreeing to these terms and conditions listed. These conditions are posted on Ottens website (www.ottensflavors.com) for your review and may be subject to change.***

Purpose

The purpose of the Ottens Flavor’s Supplier Manual is to help Suppliers deliver consistent quality products to Ottens Flavors and its customers. These expectations have been identified as key in meeting our customers’ needs. It is the Suppliers’ responsibility to meet these expectations. This ensures that products produced for Ottens Flavors are safe and satisfy our quality requirements. Ottens Flavors has set these requirements forth as minimum expectations. They are essential for the effective management of food safety and quality. They are not intended to alter or eliminate any requirements that may be set forth in any contracts or product specifications issued by Ottens Flavors.

Hazard Analysis Critical Control Point (HACCP)

Suppliers shall have a documented HACCP plan for each ingredient, product, and packaging material produced for Ottens Flavors. The HACCP plan development shall be consistent with the seven HACCP principles defined by the National Advisory Committee on Microbiological Criteria for Foods (NACMCF).

1. Conduct a hazard analysis
2. Determine and establish the critical control points and limits (CCP’s)
4. Establish monitoring procedures
5. Establish corrective actions
6. Establish verification procedures
7. Establish record-keeping and documentation procedures

Personnel shall receive annual training in HACCP. Training shall include understanding of CCP’s; associated critical limits; measurement methods; operation, testing and calibration of the measuring equipment; and corrective actions to be taken. Training of personnel shall be documented. Products found to deviate from critical limits of a CCP shall not be shipped to Ottens Flavors. Records shall be maintained for a minimum of three years or the shelf-life of the product whichever is longer.

Allergen Control

Raw materials and food contact packaging of each product shall be reviewed to determine if any of the following allergens are present but not limited to. The allergens to be reviewed for are:

1. Almonds	2. Barley	3. Brazil Nuts	4. Cashew	5. Celery	6. Coconut	7. Crustacean
8. Egg	9. Fish	10. Hazelnut	11. Kamut	12. Lupin	13. Macadamia	14. Milk
15. Mustard	16. Oats	17. Peanut	18. Pecan	19. Pistachio	20. Rye	21. Sesame Seed
22. Soy	23. Spelt	24. Tree Nuts	25. Walnut	26. Wheat	27. Sulfites (> 10 ppm)	

- All allergens shall be identified on the label and on supplier technical data information supplied to Ottens Flavors.
- Programs shall be in place to prevent carryover to products not labeled as containing allergenic materials. Allergens present in in-process material shall be properly identified.
- A documented program for handling rework that may potentially contain allergens shall be in place. The program shall ensure that rework is properly labeled and added only to products with like ingredients.
- Cleaning procedures shall be documented and in place to ensure that all equipment is cleaned prior to being used to produce non-allergen containing products. Cleaning shall be inspected by management personnel and documented prior to use.
- Personnel shall receive annual training in Allergen control. Training shall include: allergen awareness, cleaning procedures, rework procedures and controls, and disposition of potentially and contaminated product. Training of personnel shall be documented.
- The medical community or regulators may at any time identify new allergens.
- Management shall maintain an ongoing awareness of allergenic substances.

Foreign Material Control

- Foreign material is defined as an object or material not intended to be part of the product (such as, but not limited to, glass, metal, plastic, wood, rust, dirt, rocks, paper, cloth, insect parts, rodents, hair, feathers).
- Suppliers shall have metal detectors at the final stage of the process prior to packaging. Where not practical, alternative programs shall be in place (i.e., filters or screens) for the elimination of foreign material. Equipment shall be capable of detecting 2.5 mm (or smaller) 316 stainless steel, 1.5 mm (or smaller) ferrous and non-ferrous pieces.
- Calibration procedures shall be documented and include procedures for periodic testing of the equipment in ensure proper operation.
- Verification testing shall include testing with all three test pieces at a predetermined frequency.
- Personnel shall receive documented training annually. Training shall include operation, testing, and calibration of the equipment. Training shall also include what actions to be taken when potential foreign material contamination occurs.

Quality Programs

- Quality and Food Safety programs that shall be in place include, but are not limited to, the following:

Good Manufacturing Practices (GMP)

- All plant employees, outside contractors, and visitors shall comply with GMP requirements as defined by current laws and regulations. All buildings, grounds, equipment, and processes shall also meet GMP requirements.

Good Laboratory Practices (GLP)

- All laboratories and laboratory personnel shall comply with GLP requirements as defined by current laws and regulations.

Integrated Pest Management

- A documented pest management program shall be in place to effectively prevent pest activity in the facility or surrounding area.
- Trained personnel shall manage the program. A certified pest control operator shall perform all pest management activities. The facility shall maintain a copy of the pest

control operator's current license. Rodent traps in the facility shall be serviced at least twice monthly or more often as pest activity warrants. A site map noting the location of all pest control devices shall be maintained at the facility.

Sanitation

- The supplier shall have a documented sanitation program that meets all Regulatory standards. The program shall ensure cleanliness of the food handling equipment and the facility. Sanitation effectiveness monitoring program shall be in place.

Rework Controls

- The supplier shall have a documented rework procedure detailing the control and use of rework. The procedure shall identify handling procedures for rework containing allergens and controls to prevent cross contamination of such rework. Rework shall be labeled and quarantined as such.

Formula/Process Change Notification

- Ottens Flavors shall be notified in writing prior to any change in formula or process used for the manufacturing of products for Ottens Flavors. Any effect on ingredient statements, nutrition labeling, allergen labeling, functionality of the product or manufacturing site change shall be identified.

Traceability

- Suppliers of products for Ottens Flavors shall have a system in place to identify and trace all products and their components. Suppliers shall perform unannounced mock recalls at a minimum of twice per year. Material must be retrieved in less than two hours. This exercise shall be documented noting and correcting any deficiencies.
- Suppliers shall identify incoming materials with a lot number through which the date of receipt and the source can be determined. The lot number shall be clearly identified on the shipping container and recorded on manufacturing records of products in which the material is used.
- All production runs shall be identified with lot numbers which enable complete traceability from raw material receipt through final packaging.

Food and Drug Guarantee

- Suppliers of products shall provide Ottens Flavors with a continuing Food and Drug Guarantee. The supplier shall have a system in place to ensure that all products supplied are not adulterated or misbranded within the meaning of the FD&C Act or regulations. This applies to suppliers of products made within the United States and products shipped into the United States from any other country.

Notification of Regulatory Contacts/Actions

- Suppliers shall have a system in place to notify Ottens Flavors of any regulatory visits, sample collections, regulatory actions or product recalls which may relate to products produced for Ottens Flavors.
- When any product produced for Ottens Flavors is sampled by a regulatory agency, all product represented by that sample shall be placed on hold. A duplicate sample of the lot sampled by the regulatory agency may be required by Ottens Flavors. If the sampled product has been shipped to Ottens Flavors, the supplier shall immediately notify Ottens Flavors of the product sampling.
- Ottens Flavors shall be notified in a timely manner of any voluntary or involuntary retrieval of a product including any material shipped to Ottens Flavors which is a

reportable food. Ottens Flavors will notify suppliers if an item is found to be reportable from the supplier's company.

Quality Auditor Access

- Ottens Flavors quality auditors shall be authorized to enter and audit or inspect at reasonable times any establishment storing, supplying, or producing for Ottens Flavors upon coordination with the supplier's site. The audit of the facility shall extend to all pertinent production areas including equipment, finished and work in process materials, containers, and labeling. The audit or inspection may include a review of process, records, programs, process controls, and facilities that produce products for Ottens Flavors. It is Ottens Flavor's policy to give advance notice of intent to conduct an audit or inspection.

Food Security

- Suppliers shall have a documented food security program. The program shall include an annual food security risk assessment. Suppliers shall have employee background screening on all new employees and temporary employees.
- Access to the facility shall be controlled to keep unauthorized persons from freely entering the facility. Visitors to the facility shall be identified and escorted in the facility. Windows, doors, utilities, and roof openings shall be secured. Contractor access to the facility shall be controlled.
- Training on the food security program shall be performed for all employees on an annual basis. Training shall include that the Federal Anti-Tampering Act (18USC1365) makes it a federal crime to tamper with or taint a consumer product, or to attempt, threaten or conspire to tamper with or taint a consumer product, or make a false statement about having tampered with or tainted a consumer product. Training shall be documented.
- Ottens Flavors shall be notified in the event of a tampering incident involving products shipped to Ottens Flavors.

Third Party Audit Requirements

- Suppliers shall participate in third-party audits annually. The results shall be provided to Ottens Flavors. The Ottens Flavors preferred audit is GFSI (SQF or BRC). Other approved audits are GMA-SAFE, Silliker, FISA, and NSF (Cook & Thurber). Other third-party audits not listed shall be pre-approved with Ottens Flavors prior to selection. Every year a new audit is conducted, a copy of the report/certificate shall be uploaded into TraceGains.