Supplier Expectations Manual

HP Hood LLC

12/17/2021

Always good. Always

Hood®

Founded in 1846 in Charlestown, Massachusetts, today HP Hood LLC ("Hood") is one of the largest branded dairy operators in the United States.

Hood manufactures a variety of branded, licensed, and private label products including fluid dairy, juice and drinks, cultured foods, frozen desserts, aseptic and extended-shelf-life dairy, and non-dairy beverages.

The company's continued success lies in its long-standing commitment to traditional values: quality, innovation, and service. Hood's product leadership comes from anticipating trends, developing strategies to meet customers' needs, and executing marketing, operations, and sales programs to maximize opportunities for all of its product lines.

Today the company employs approximately 3,000 people, owns and operates 13 manufacturing facilities throughout the U.S., including one on each coast, and serves customers nationally and internationally. The company also maintains its own research and development operation, which supports the superior product quality and innovation that Hood customers have come to expect.

Hood's Expectations for its Suppliers

As a supplier for Hood, we recognize your facility as one of the leaders in the industry. We also recognize that, that in some cases, we can only be as good as our suppliers. This document was developed to outline the minimum expectations of Hood's ingredient and packaging suppliers. Hood's suppliers must comply with all of the Standards set forth herein.

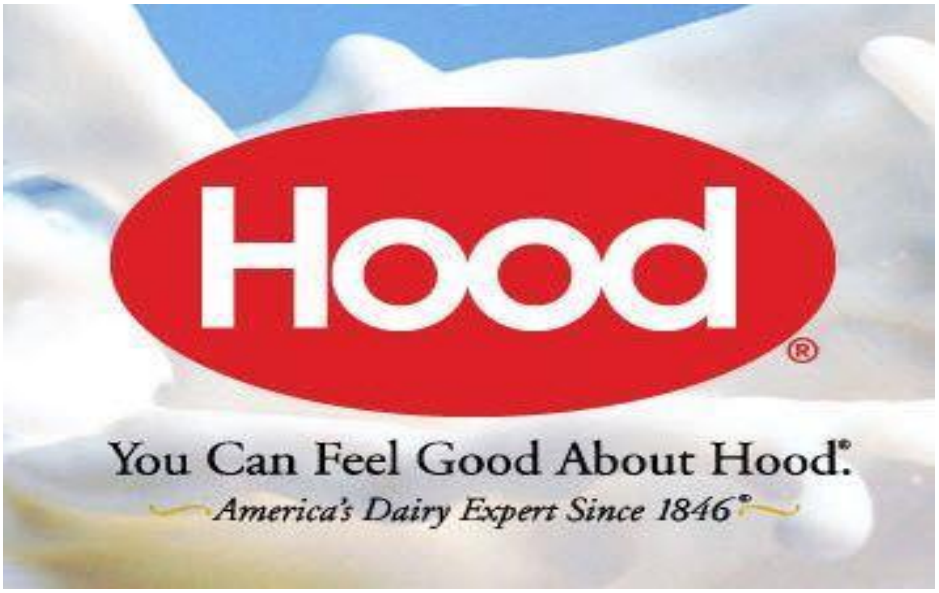


Table of Contents

1. Top Management Commitment and Quality Culture Standards

1. Senior management actively supports the food safety practices and programs.
2. Employees are aware of the supplier's commitment to food safety.
3. Adequate resources are provided to implement, maintain, document, and make improvements to the food safety and quality programs.
4. Senior Management review meetings are conducted annually or more frequently as appropriate to review food safety findings and corrective actions.
5. Management regularly participates in annual food safety training.
6. Management responsibility and accountability are assigned and documented for required Food Safety Plan and Food Quality Plan elements.
7. Management is dedicated to food safety and quality with sufficient knowledge, resources, and technical skills to run Food Safety and Food Quality programs.
8. Food safety records are maintained for a minimum of two years.
9. The most senior person in the facility must sign and date the Food Safety Plan upon initial completion and any modifications of the Plan.
10. A list of corporate and plant contacts is on file at each facility and corporate headquarters, and is updated annually.

2. Regulatory Compliance Standards

1. All producing locations and warehouses are registered in compliance with the United States Bioterrorism Act of 2002.
2. The supplier maintains all necessary licenses, registrations, permits, approvals, and authorizations required by regulatory agencies. Copies are readily available for review.
3. Supplier's facilities will continuously meet the applicable laws and regulations of the jurisdiction in which the facility is located and the jurisdiction to which product will be sold, including all local, state/provincial, and federal laws and regulations.
4. Each of supplier's facilities has contact information for relevant regulatory agencies in its accessible files.
5. Product labels, including any product claims, shall comply with all applicable local, state/provincial, and federal laws and regulations in the jurisdiction in which the product will be sold.
6. Regulatory audit results for the past 5 years that contain findings of Official Action Indicated (OAIs), Voluntary Action Indicated (VAIs), Noncompliance Records (NR), and/or Notice of Intended Enforcement (NOIE) must include written corrective actions.
7. Hood will be notified:
    a. When there is regulatory action or a report (Form 483) is issued relating to any product or ingredients Hood purchases from supplier.
    b. Prior to a recall or withdrawal of products, ingredients or materials that were produced in a facility that produces any Hood product.
    c. When contamination is detected in products that were produced in a facility that produces any Hood product.

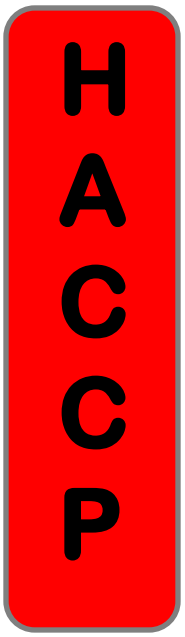
3. Food Safety Standards

1. The supplier has a documented Food Safety policy and Food Quality policy.
2. The Food Safety Plan includes all FDA Food Safety Modernization Act (FSMA) / Hazard Analysis Critical Control Point (HACCP) components, as well as: process flow diagrams for each process/product, a hazard analysis on all ingredients and primary packaging materials, Critical Control Point (CCP)/ Process Preventive Control (PPC) control charts, as applicable, and appropriate document controls (revision numbers, etc.).
3. A Food Safety Team is in place that is responsible for developing and modifying the Food Safety Plan. Team members include a facilitator/ Preventive Controls Qualified Individual (PCQI), a member of management, and a scribe at a minimum. The Team should be comprised of members from cross-functional areas of the plant: Production, QA, Maintenance, etc. One or more team members must be from the management team to ensure full support.
4. Food Safety Team meets at least annually to review Food Safety recordkeeping and/or compliance as indicated in the following sections.
    a. Prerequisite programs are in place that support the Food Safety program.
    b. The Food Safety Plan includes CCPs/PPCs, critical limits, monitoring activities, corrective actions, verification procedures, and record keeping procedures. CCPs/PPCs are validated by documented scientific evidence or historical evidence indicating CCP/PPC control measures and limits to eliminate or reduce hazards.
    c. CCPs/PPCs are verified per the Food Safety Plan. Critical limits are clearly marked and recorded to easily identify deviations. CCP/ PPC records are reviewed prior to releasing product.
    d. Other Preventive Controls (PCs) are in place and verified as required by the Food Safety Plan Hazard Analysis.

e. Plant management reviews the Food Safety Plan annually with the Food Safety Team to assure the process is still accurate.

5. Foreign Material Prevention/Detection Program, including the use of screens, sieves, magnets, and metal detectors, are used in the production process as late as practical. Supplier has a documented calibration program in place.

FDA FOOD SAFETY MODERNIZATION ACT



Hazard
Analysis
Critical
Control
Points

4. Receiving/Storage Control Standards

1. Documented procedures and specifications are in place to receive, inspect, and if needed, reject inbound materials.
2. All carriers are inspected. Acceptability criteria for carriers include no mechanical defects, no foreign odors detected, no safety risk posed by any non-food grade items present on a trailer, no evidence of pest infestation, and adequate temperatures are maintained. Trailers are swept and/or cleaned as needed prior to loading.
3. All inbound and outbound trailers are sealed or locked to protect the ingredients or finished goods. Seal numbers must match the documentation prior to unloading.
4. A system for documentation of bulk tanker cleaning is in place.
5. Receiving personnel compare Bill of Lading (BOL) and other shipping documentation against Purchase Order (PO) to assure correct products and quantity are received.
6. Inbound materials are properly packaged, identified, and labeled. A documented food safety protocol exists for the treatment of nonconforming or damaged/exposed containers.
7. Warehouses are completely protected from the outside environment and have no holes in walls or ceiling. Materials are stored off the floor.
8. Temperature-sensitive items are maintained at proper temperatures. Rooms that are temperature controlled are continuously monitored.
9. Pallets do not pose a risk for unsanitary, chemical, or physical conditions.
10. Loading docks (including rail) have dock seals to protect product and the warehouse environment while loading/unloading.
11. Returned goods are handled in such a manner to protect them from contamination or the contamination of other goods.
12. Inventory is kept using a system that allows personnel to quickly identify pallet location within the warehouse.

13. A stock rotation program is in place to assure proper rotation of materials and finished goods.
14. If the facility receives and stores allergenic product and/or ingredients, precautions are in place to prevent contamination of otheritems.
15. Current specifications are on file for all materials and finished products.
16. The actual raw material producing locations are verified against the approved supplier list upon receipt. This includes name, address, city, state, and country.
17. All materials have a defined inspection program. Where appropriate, materials under inspection are placed on restricted status until inspection is complete.
18. Where Certificates of Analysis (COAs) are used to assure food safety requirements are met, a supplier test method verification program exists to assure accuracy of COA data (split samples on periodic basis and supplier participation in proficiency test program).

5. Facility Control Standards

1. Facility site and buildings are of suitable construction and design to facilitate maintenance and sanitary operations.
2. All materials used for construction are appropriate for intended use.
3. Floors are constructed of approved materials, suitable for production, and sufficiently sloped for liquids to drain properly.
4. Walls are constructed of material that is cleanable and suitable for its intended use.
5. Floor and wall junctions are appropriately sealed and maintained.
6. Ceilings are constructed of approved materials, cleanable, and suitable for production area.
7. Doors have smooth, non-absorbent surfaces, are self-closing, and tight fitting.
8. Openings are designed to minimize entry of pests and foreign matter.
9. Windows are constructed of appropriate materials, durable, shatter resistant, cleanable, and suitable for production area.
10. Stairs and conveyors are situated and constructed so that no contamination of product and packaging materials occur.
11. Overhead structures are cleanable, prevent contamination of product and packaging materials (e.g., through appropriate shielding), and do not hamper cleaning operations.
12. Lighting should be adequate and have appropriate foot-candles, where applicable, throughout the facility. It should be constructed to prevent contamination in case of breakage.
13. Ventilation design does not create cross contamination risk.
14. Where appropriate, a positive air pressure system is in place.
15. Air supply is filtered (target of 1 micron/95% efficiency), screened, and maintained.
16. Air systems are cleanable and maintained on a routine basis.
17. Air intakes are located to prevent the intake of contaminated air.

18. Compressed air or gases which have direct or indirect product contact exposure are appropriately dried, filtered, and used in a controlled manner to prevent cross contamination.
19. Washrooms are segregated from food processing areas, have self-closing doors, and are correctly ventilated and maintained.
20. Washroom and restroom waste and drains are physically segregated from production waste.
21. Lunchrooms and change rooms are separate from and do not lead directly into food processing areas.
22. Lunchrooms and change rooms are correctly ventilated, maintained, and supplied with adequate locker space for employees' personal belongings.
23. Processing areas contain sufficient number of conveniently located hand washing stations with properly trapped waste pipes connected to the drains.
24. Drainage and sewage systems are equipped with appropriate traps and vents.
25. Traffic pattern controls for employees and materials should be in place to minimize risk.
26. Microbiological laboratories are designed, located, and operated to prevent contamination of people, plant, and products.
27. Potable water (including wells) are used in all manufacturing processes including steam supply, cooling media, process water, and ice. Potability of water is tested at least annually and sampled at point of use.
28. Incoming water is filtered as appropriate. Target is a 5-micron filter.
29. All hoses, taps, cross-connections, or similar sources of possible contamination are equipped with anti-backflow devices. Water inlet piping must be a minimum of 1 inch above water levels in tanks (e.g., CIP- clean in place) and the air gap between the pipe and the overflow level needs to be at least 2 times the diameter of the largest inlet pipe.
30. Recirculated water has a separate distribution system.
31. Grounds are free of old equipment, wood, weeds, or debris.
32. Roadways are properly graded, compacted, and self-draining.

6. Food Defense Standards

1. The plant management has defined responsibility for the security of the facility.
2. All exterior doors are self-closing and locking and cannot be opened by unauthorized personnel or visitors from the outside.
3. The facility has and follows a documented program for visitors and contractors. Internal and external visitors must sign in/out on a log. External visitors are identifiable from employees.
4. Background checks are conducted on employees prior to date of hire.
5. Employees are trained to help monitor security on a daily basis.
6. Supplier has appropriate administrative and technical safeguards to protect supplier's systems and facilities from a security incident or cyber-attack.
7. The facility has a documented policy or procedure for use of cell phones and cameras.
8. Incoming deliveries must be locked (consistent with the supplier policy), or sealed with a numbered seal. Receiving personnel must verify the seal number is the same as the seal number on the BOL. All outbound deliveries are locked and/or sealed with seal numbers assigned. Only supplier employees may break and/or apply the seal on shipments.
9. All potential entry points are secure including roof opening, vents, and plant utilities.
10. Exterior of facility is well lit and contains appropriate signage to deter trespassers.
11. Controls are in place to limit access to processing areas to authorized personnel and contractors only.
12. Visitors & Contractors are limited and should follow Good Manufacturing Practices expectations.

7. Good Manufacturing Practices Standards

1. A plant specific Good Manufacturing Practices (GMP) program is developed and implemented that clearly defines GMP expectations for all areas of the facility. The GMP program identifies and details controls in place for areas of risk that could compromise the integrity of the product, process, or environment.
2. The plant specific GMP program is reviewed at a defined frequency or when changes occur.
3. Personnel Practices are controlled including:
    a. An illness and disease notification program
    b. Personnel with exposed cuts/sores and bandages
    c. Clothing and footwear requirements
    d. Hair and beard control
    e. Food and drink policy
    f. Protection of food, food contact surfaces, and packaging materials
    g. Jewelry control policy
    h. Medication usage
    i. Handwashing requirements
    j. Traffic patterns
4. Uniforms & footwear are controlled including:
    a. Uniform and footwear usage, cleanliness, and design
    b. Storage of personal items, street clothes, and dirty laundry
    c. Laundering requirements
    d. Provisions for visitors, contractors, and temporary hires
5. Tobacco usage and Food & Drink consumption are controlled including:
    a. Location - where allowed and where restricted
    b. Waste disposal of items
    c. Handwashing requirements to return to work areas
6. Hand washing facilities have hot and cold running potable water, soap, sanitizer, sanitary hand drying supplies or devices, and a cleanable waste receptacle.

7. A Glass, Brittle or Hard Plastic policy or procedure should be in place to ensure materials are controlled or eliminated. A master list of all such items at the facility is maintained and audited at least annually. Supplier has procedures for handling the breaking, cleaning, and disposal of such items.
8. Production practices are controlled by each facility. This includes the use of hand sinks and sanitizers, prohibitions against placing items on the floor, control of the reuse of containers, storage and staging of ingredients and packaging away from contamination, control of wooden items and pallets, and control of trafficpatterns within the facility.
9. Facility has a program in place to protect product during times of construction.
10. Housekeeping practices are controlled including doorway sanitizer (foam/foot bath), maintenance, and control.
11. Areas are designated for the storage and removal of water and inedible material to prevent product contamination.
12. Waste disposal practices are in place and documented.
13. Operational tools are properly designed for their intended use. Tools should be maintained in good condition, stored properly, and segregated between different areas of the facility via a color-coded program.
14. High Risk Areas are controlled by traffic patterns, employee practices such as handwashing, uniform/footwear/tool control, positive airflow, filtered (HEPA) air, water usage, and dedicated forklifts and pallets.

8. Supplier Management Standards

1. An approved supplier management program exists and requires the following documentation: Third party audit results with corrective actions (preferably Global Food Safety Initiative (GFSI) certified), Ingredient Statement/label, Country of Origin, address of producing location, allergen information, and Food Safety information. Qualified auditors are utilized when audits are required.
2. All ingredients and packaging materials are sourced from approved suppliers.
3. Documented risk assessment and procedures are in place to approve and unapprove a supplier.
4. Approved suppliers meet the requirements of the Foreign Supplier Verification Program (FSVP).
5. Incoming purchased materials meet the specifications from approved sources prior to use.
6. Supplier may have exception provisions in place to purchase materials from non-approved suppliers, if needed in an emergency.

9. Personnel Training Standards

1. **Good Manufacturing Practices (GMP) Training –** All plant employees receive documented GMP training annually. All visitors/contractors to the facility receive GMP training specific to the planned activities they will perform. After training is completed, each individual is evaluated after a pre-defined time to determine if training was effective.
2. **Sanitation Training –** Employees involved in managing, supervising, and performing sanitation duties receive documented training annually.
3. **Allergen Training –** Facilities which receive ingredients that are considered an allergen provide documented allergen training on an annual basis. This training shall include corrective actions if contamination were to occur.
4. **Regulatory Training –** Employees directly responsible for handling regulatory inspections, recalls, Food Safety Modernization Act (FSMA), and Reportable Food Registry events have documented training.
5. **Food Security Training –** All employees receive food security documented training annually.
6. **Food Safety Training –** Plant Management, Plant Food Safety Teams, Food Safety record reviewers, and CCP/PC monitors receive in-depth Food Safety training. This training is documented, verified, and validated. After training is completed, employees who received the training are evaluated by supplier after a pre-defined time to determine if training was effective. All plant employees receive basic Food Safety training on an annual basis at a minimum.
7. **Positive Release Training –** Employees responsible for positive release / critical records review practices receive documented training on the program prior to performing the task and ongoing training at a defined frequency.
8. **Incident (Crisis) Management Training –** Documented training on the facility's Incident Management Plan for the Incident Management Team is conducted at least annually or as needed.

10. Traceability & Recall Standards

1. A recall program is in place, documented, and practiced.
2. All materials used in the manufacture of products (ingredients, food contact packaging, rework, and finished goods) are identified with lot and date code, and are traceable one step forward and one step backward.
3. The coding format is agreed upon and will be supplied by the contract manufacturers and raw material suppliers.
4. A product specific production lot code is not to exceed a 24-hour period or a clean up to clean up production period.
5. Periodic "Clean Breaks" are made to limit exposure to rework cycles and bulk inventory.
6. Specified coding is applied and legible on every package.
7. Traceability records are maintained throughout the manufacturing and distribution process, including product disposals and returns, for a period consistent with regulatory requirements.
8. Traceability effectiveness is tested, verified, and documented with necessary corrective actions a minimum of twice a year for finished goods, ingredients, and food contact packaging.
9. The target of traceability is 100% (+/- 2%) within 4 hours of starting the trace for all categories.
10. The facility has a crisis /incident management plan that includes key contacts and a communications plan to address different types of incidents.
11. Documented training of the crisis/ incident management occurs at least annually or as needed.
12. Notification to Hood will occur prior to recall, withdrawal, or regulatory reporting.

11. Allergen Control Standards

1. The following Big 9 Allergens are controlled and managed:

Peanuts	Tree nuts
Eggs	Milk
Wheat	Fish
Crustacean	Sesame

   Soy (including soy lecithin) – Soybean oil if Refined, Bleached, and Deodorized (RBD) will not be considered an allergen.

2. A program exists that addresses allergen modes of failure:
   a. Ingredient Management
   b. Scheduling / Sequencing (Including Changeovers)
   c. Cleaning / Sanitation
   d. Rework
   e. Incorrect packaging / Labeling
   f. Cross Contact
   g. Other
3. Sensitizing agents are not true allergens and thus are managed separately from allergens. These items need to be labeled per applicable regulations, and managed and controlled throughout the production process, including the rework program. The following are Sensitizing Agents to be controlled and managed:
   a. Sulfites
   b. FD&C Colors
   c. Monosodium Glutamate (MSG)
   d. Autolyzed Yeast Extract
   e. Hydrolyzed Proteins

4. Facilities that receive an ingredient considered an allergen or sensitizing agent should have a documented risk assessment on file, which includes control steps used to mitigate the risk. A risk assessment includes:
    a. Identification of any allergens or sensitizing agents present in the plant.
    b. A list of formulas and labels for the allergens or sensitizing agents contained in them.
    c. A matrix of products and/or operations, which handle or process the allergen(s) or sensitizing agents. This matrix is used to clearly identify the allergens that require control.
    d. The methods or procedures used to control allergens and sensitizing agents within the facility.
5. Any allergen or sensitizing agent that is or may be in a product is included on the ingredient statement regardless of whether the presence of the allergen or sensitizing agent is intentional or an incidental addition. Labeling of allergens and sensitizing agents will follow industry guidance.
6. Product that is intended for export conforms to the allergen regulations of the country or countries where they are to be sold.
7. Allergen-containing ingredients, packaging materials, or finished products, as well as sensitizing agents, are stored in a manner to prevent cross contact (e.g., Different types of allergens need to be separated).
8. Cross contact between ingredients and finished products containing different allergens and/or sensitizing agents are controlled.
9. If sanitation is determined to be a mechanism for allergen or sensitizing agent control, procedures are validated to demonstrate the effectiveness in removing the allergenic substance.
10. At least once a year allergen validation testing is conducted.
11. Visual verification of the effectiveness of each allergen or sensitizing agent clean-up is documented after each instance where sanitation is used as an allergen or sensitizing agent control step.
12. Rework for materials containing an allergen or sensitizing agent is clearly identified, and is only used in products which contain the same allergen or sensitizing agent.

12. Sanitation Standards

1. Sanitation, cleaning procedures, and work instructions are documented for all production areas, processing equipment, and other parts of the facility. This includes the specific area/equipment to be cleaned, cleaning frequency, type/name of chemical to be used, a list of parts/areas to be manually cleaned when equipment is disassembled or cleaned in place, detailed steps of cleaning, person responsible for cleaning, and verification records.
2. A Master Sanitation program is in place, which includes all areas of the facility.
3. A drain-cleaning program is in place that includes locations of the drains, cleaning procedures, methods of controlling cross contamination, frequency of cleaning, and verification records. Floor drain brushes, buckets, and other drain cleaning tools are controlled to prevent cross contamination.
4. Processing equipment is designed and constructed to be cleanable and is maintained in a sanitary condition.
5. Tools for sanitation are stored in a clean, dry, and sanitary manner, controlled through labeling or color coding, and not interchanged or stored with production or janitorial tools.
6. Sponges, reusable cloth towels, and wooden handled tools are not used for sanitation. Wire brushes and fibrous scouring pads should be avoided.
7. Plant water used for sanitation is analyzed annually to ensure effectiveness and efficiency of the sanitation chemicals being used.
8. Reused water, when used for sanitation purposes, complies with applicable regulatory requirements. Reused water shall not be used as a final rinse.
9. Raw equipment and pasteurized equipment are not washed or sanitized by the same Clean in Place (CIP)/ Assisted Cleaning System (ACS) / Clean Out of Place (COP) system or equipment.

10. Areas that require dry cleaning are kept dry. When moisture is introduced into a dry area, plans are in place to quickly and thoroughly remove moisture from the area.
11. Sanitation data is monitored and trended to determine the effectiveness of sanitation over time. Corrective actions are issued and tracked.
12. A pre-operational (Pre-Op) program is in place that documents visual inspections, analytical tests, and review of sanitation records in production after each sanitation cycle/circuit.
13. Central sanitizer dispensing system concentrations are monitored daily, with all drop stations monitored at least once per month.

13. Chemical Control Standards

1. A chemical control program manages the use, storage, controlled access, and handling of non-food chemicals at the facility.
2. Approved vendor and chemicals lists are maintained. A procedure is in place where the facility receives chemicals to compare incoming chemicals to the approved vendor list.
3. A chemical list categorizing types of chemicals is maintained. The list should include cleaning chemicals, maintenance chemicals, boiler treatment chemicals, pest control chemicals, potable water treatment chemicals, wastewater treatment chemicals, laboratory chemicals, office chemicals, and processing aids.
4. Non-food grade hazardous chemicals are stored away from all products, ingredients and packaging.
5. All containers are clearly labeled with a proper chemical label regarding their contents.
6. Chemicals are not dispensed from or stored in containers that were originally intended to be used for ingredients, food, or food packaging.
7. Chemical usage rates are clearly outlined by Standard Operating Procedures (SOPs), and their use is consistent with manufacturer recommendations. Usage monitoring procedures are clear and accurate.
8. All lubricants used on food processing equipment, or that may contact food, are approved for use in food applications.
9. Current copies of all Safety Data Sheets (SDS) are on file and readily accessible.
10. Empty chemical containers are discarded or returned to the chemical vendor.
11. Facility has on file proper disposal procedures for each chemical used.

14. Environmental Monitoring Standards

1. Pathogen Environmental Monitoring (PEM) program actively detects pathogens in the plant environment and the program is reviewed annually.
2. Corrective actions are effective, appropriate, and documented, and eliminate the cause of environmental pathogens.
3. The PEM program is designed to detect pathogens that are associated with the products being manufactured. Wet production plants focus on Listeria and dry production plants focus on Salmonella and other pertinent pathogens. In addition to testing for the pathogens of focus, the PEM program may test for other organisms to ensure robustness.
4. The PEM program states swab quantities, locations, schedule, and responsibilities. This can include static, rotating, and random site selection based off a documented strategy.
5. Data is stored in a format that allows access to employees working on the PEM program and appropriate plant leadership. Data is analyzed for trends, and plant leadership takes actions to address and resolve any trends.
6. Employees that are performing the PEM functions are properly trained in the sampling techniques used and sample site selection. Training also includes troubleshooting and investigational swabbing (vectoring). This training is documented.
7. Swab materials and test methods are selected based on generally accepted scientific knowledge accepted by the industry. Methods are documented, validated, have AOAC approval, and are ELISA or PCR based. Suspect or presumptive positives are treated as positive unless cultural confirmation proves otherwise.
8. PEM program implementation considers variation, with samples taken at different times, different days, on different shifts while considering system cleanliness. The program allows for random investigational swabs in addition to routine samples.

9. A process is established for special events that require swabbing, such as construction or the installation of newequipment, regardless of time or day.
10. Where areas are positive or potentially positive, traffic is re-routed, extra GMPs are employed, and/or sanitation is increased to provide temporary mitigation of an issue.
11. Positive results are followed up with retesting to achieve consecutive negatives (minimum 3). Source identification (vectoring) for any positive results occurs and is thorough.
12. Environmental findings are generally aligned with improvements to infrastructure and equipment. To minimize harborage of bacteria and areas that are difficult to clean, a formal process for risk assessment may be employed. Additional resources (such as employees, cleaning & sanitizing chemicals, maintenance activities, etc.) are dedicated to environmental findings where appropriate.
13. Finished products that are tested for pathogens remain on HOLD until results are received and are negative. This includes all applicable product from one cleaning and sanitizing process to another (i.e., clean to clean).
14. Air monitoring is conducted as an early indicator ofpotential microbiological issues including yeast and molds.
15. The amount of samples in the PEM program are based on the facility size and layout. PEM sites and quantities are selected based on zones, drain locations/quantities, and equipment as it relates to pathogen risk. A site map should be used to define all areas of the facility including zones.

15. Pest Control Standards

1. A pest control program is in place, documented, maintained, reviewed, assessed, and kept current. The program contains (but is not limited to):
    a. Supplier/Pest Control Company Name and Operator Information
    b. Schematics of the facility outlining pest device placement
    c. Contract listing services provided
    d. Pest Control Company Certificate of Insurance
    e. Copy of Pest Control Company License
    f. Copy of the Pest Control Operator Applicator's License
    g. Documented Inspection Summaries (including activity log and corrective actions)
    h. Pesticide/bait usage log (including lot number)
    i. Copies of all chemical labels and Safety Data Sheet (SDS)
2. Pesticide application and control responsibility, even if performed by a contracted service, rests with the facility's management team. Minimum documentation to be maintained on site include:
    a. Application method
    b. Manufacturer's instructions for use
    c. Safety equipment used for the application of pesticides within the facility/grounds
    d. Post treatment procedures
3. The Pest Control Operator (PCO) provides a written summary of each visit and these will be kept and reviewed by the facility. Documented preventive and corrective actions are taken. At a minimum, internal traps are checked weekly and external traps are checked monthly. All inspection results are verified.
4. Non-EPA or equivalent registered pesticides are not used at the facility.
5. Pesticides are not stored in the manufacturing area. Pesticides are stored in separate and locked storage locations.

6. Pesticide usage records are kept for the period necessary to meet applicable state and local regulatory requirements.
7. Insect Light Traps (ILTs), if used, are located to prevent contamination of finished product, ingredients, and packaging, and are not visible from the outside. Insect-o-cuters are not used in any location where food, packaging, or food contact equipment are located.
8. Bait Stations are used only on the exterior of the plant and are checked and cleaned at least monthly. Discretion may be used during winter months.
9. Only baitless traps are used indoors. These traps are placed around the perimeter of the facility and are checked at an appropriate frequency.

16. Finished Goods Specifications Standards

1. Finished products are tested by predetermined testing protocols before they are sold and/or shipped to Hood. Responsibility for reviewing test results, CCP/PPC or PC documents, environmental tests, etc. prior to product release is clearly designated.
2. Non-conforming product is effectively identified and a process is in place to prevent inadvertently using or shipping such product.
3. Hood's specifications are maintained in such a way to prevent product from shipping that does not meet specifications. Supplier will consult with Hood promptly after discovery of any nonconforming materials and prior to shipment.
4. Finished product retention samples are collected and maintained.
5. Weights of finished products are documented and retained for review.
6. The Hood Team shall approve all finished product packaging for Hood branded products prior to production. All changes must be approved in writing by Hood prior to production.
7. Ingredient or product specifications must be agreed upon in writing by Hood prior to production.

17. Laboratory Standards

1. Laboratory methods follow accredited methods (Standard Methods for the Examination of Dairy Products, AOAC, BAM, etc.). Equipment and monitoring devices are calibrated in accordance with the method/frequency per manufacturer's instructions and documented.
2. Testing methods and frequency are determined for all testing to ensure food safety and quality of the product.
3. Water monitoring is conducted at a minimum annually and/or as required by regulatory, and/or customer requirements to assure that it meets Microbiologically Suitable (MS) standards on its use.
4. Records are maintained on incoming media, reagents, and sterile supplies.
5. Preventive maintenance is performed on laboratory equipment at a defined frequency.
6. Required laboratory quality controls (e.g., air quality, agar weight loss, dilution water toxicity, etc.) are performed at a defined frequency.
7. Lab participates in a proficiency testing program with defined frequency.
8. When external laboratories are used, supplier ensures the lab is accredited for the specific testing the lab is conducting.

18. Internal & External Audit Standards

1. Internal audits are conducted at a frequency to assure food safety and food quality. These include:
   a. Good Manufacturing Practices – at least monthly
   b. Positive Air Pressure of Production area – at least annually
   c. Glass and Brittle/Hard Plastic – entire facility at least annually
   d. Food Safety Plan and Preventive Control – annually
   e. Food Quality Plan – annually
2. An audit of the Quality Management System (QMS) is conducted at least annually.
3. Compliance of product to the agreed upon specifications is audited.
4. Supplier is required to maintain GFSI (Global Food Safety Initiative) certification.
5. Supplier must perform Food Safety audits of its suppliers based on risk associated with the ingredient or packaging supplied by such supplier.
6. A third party conducts an audit of supplier's Food Safety Plan annually for all food and food contact material.

19. Corrective/Preventive Action Standard

1. A documented Corrective Action Program (CAP) exists for any deviation or finding related to food safety, food quality, and product specifications.
2. A formal Corrective Action Program shall include findings, the individual to whom the corrective action has been assigned, the date due, and the actual date of completion.
3. Effective corrections are verified before closing the corrective action.
4. Recurring deviations/findings are given high priority.

20. Change Management Standards

1. A process to manage changes that affect food safety is in place. This applies to all program areas that impact food safety and food quality.
2. Changes are reviewed by Food Safety Team to determine if Risk Assessments, Flow Diagrams, and/or Food Safety Plans require updating. Food Safety updates should be made prior to the change being implemented. Food Safety Team sign off is required before change is implemented.
3. There is a process in place to monitor industry food safety occurrences, emerging pathogens, new food safety hazards, and revised regulatory guidance. Risk Assessments and Food Safety Plans must be updated to reflect new risks.
4. Hood shall be notified if the change will affect the finished product (e.g. label change).
5. Production may not be moved to another production facility without prior written approval of Hood.
6. Notification must be made to Hood prior to any changes to the materials or ingredients, including formula changes.

Raw materials (Ingredients):

Supplier shall not implement any changes that could impact product safety or quality, certification, or regulatory requirements, without prior, written approval from Hood. Examples of changes that require prior, written approval include:

- Changes to supplier, supplier location, or supplier's process to manufacture an ingredient.
- Changes to the raw materials used in any ingredient.
- Introduction of any new Allergens, Sensitizing Agents, agricultural products in a facility that produces any Hood product.
- Any change affecting the method or rate of usage of the supplied ingredient in Hood's finished products, i.e., particle size for beverage dispersion, concentration, or strength of sub-components not related to a stated specification, etc.
- Any change that alters the Country of Origin status of the material supplied to Hood.
- Specifications:
  a. Establish Acceptable Quality Limits (AQLs), operational targets or process capability.
  b. Any change altering testing plans or methods as reviewed and approved by Hood.

- Any change to the Manufacturing Process of the supplied material.
- Any change which requires a change to the Food Safety Plan.
- Any Equipment (Lab and Manufacturing) or process change that affects product quality, product functionality, occupational health and safety, or applicable regulations.
- Lot numbering system
- Storage Conditions

Supplier shall notify Hood of any of the following changes, however, Hood's approval is not necessary in the event of:

- Regulatory Changes due to inspections or regulatory activities.
- Any change that alters the Country of Origin status of the material supplied to Hood.
- Utility changes (HVAC, Water etc.)

Packaging Materials:

Supplier shall not implement any changes that could impact product safety or quality, certification, or regulatory requirements without prior written approval from Hood. Examples of changes that require prior written approval include:

- Any equipment or process change that affects the understood capabilities or limitations of existing material as utilized in Hood's process.
- Any change to source materials or composition, including but not limited to resins, colorants, oxygen barriers, or any other changes that may impact finished product.
- Any change altering testing plans or methods as previously reviewed and approved by Hood.
- Any changes affecting the material specifications, established AQLs, operational targets, or process capability.
- Any equipment or process change that affects product quality, product functionality, or applicable regulations.

Supplier shall notify Hood of any of the following changes, however, Hood's approval is not necessary in the event of:

- Any equipment change necessitating a change to the Food Safety Plan, which Plan has been reviewed and is on record with Hood.
- Any change that alters the Country of Origin status of the material supplied to Hood.

21. Record Management Standards

1. Records must:
   a. Be kept as original records or electronic records.
   b. Contain the actual values and observations obtained during monitoring and, as appropriate, during verification activities.
   c. Be accurate, indelible, and legible.
   d. Be created concurrently with performance of the activity documented.
   e. Contain the date and, when appropriate, the time of the activity documented.
   f. Be as detailed as necessary to provide history of work performed.
   g. Provide information adequate to identify the plant or facility, including the name and the address of the plant or facility.
   h. Contain the signature or initials of the person performing the activity.
2. All required records shall be retained at the plant or facility for at least 2 years after the date they were prepared or at least 2 years after the use is discontinued, whichever is later.
3. Except for the Food Safety Plan, offsite storage of records is permitted if such records can be retrieved and provided onsite within 24 hours of request for official review. The Food Safety Plan must remain onsite.
4. Records of calibration, testing (e.g., product testing, environmental monitoring), supplier and supply-chain verification activities, and other activities must be verified within a reasonable time after the records are created.
5. Supplier has appropriate administrative and technical safeguards to protect Hood's confidential information.

22. Hood Supplier Approval Process

Hood will follow the following process to approve new suppliers.

Phase I – ***All Suppliers*** – **Corporate Purchasing**

1. Evaluate the supplier's overall capabilities.
2. Review references, current customer list, and financials.
3. Review supplier's policies, procedures, and programs related to Diversity, GFSI, Ethical Sourcing, Environmental Sustainability, Fair Trade, and others.
4. Review and approve production, warehouse, and distribution locations, along with supplier's contingency plan for each location.
5. Pricing/terms.
6. Hood must receive supplier's executed Statement of Agreement.
7. Qualified suppliers move on to Phase II.

Phase II – ***Packaging*** **– Plant Operations, Corporate Purchasing, Quality, and Supplier**

1. Plant qualification test run set up by Purchasing with plant, supplier, and/or Quality input.
2. Quality to audit manufacturing facility or review audit documentation of previous GFSI audits.
3. Quality to send Supplier Survey and Risk Assessment.
4. Probationary period of all new suppliers, pre-business award, is established at this point (generally three to six months).
5. Supplier must pass plant test run to move on to Phase III.

Phase II – ***Ingredients*** **– R&D, Quality, Corporate Purchasing, and Supplier**

1. R&D approves ingredients.
2. Quality to audit manufacturing facility or review audit documentation of previous GFSI audits.
3. Supplier to provide documentation of Ingredient Specifications, Nutritional Information (100g format), Allergens, and Safety Data Sheets (SDS).
4. Supplier to provide verification of Kosher and Organic certifications, if needed.
5. Quality to send Supplier Survey and Risk Assessment.

Phase III – ***Packaging & Ingredients*** **– Corporate Purchasing, Supplier**

1. Bid process.
2. Analyze results.
3. Award business.
4. If business is awarded to new supplier, Hood will send and Supplier will fill out and execute, if applicable, the "New Supplier" package, which includes:
   a. ACH Customer Direct Deposit Sign Up Form
   b. Hood's Credit References
   c. Form W-9
   d. Hood's Supply Agreement or Purchase Order Terms and Conditions, as applicable
   e. Hood's Packaging and Ingredient Security Requirements
   f. Hood's Supplier Classification Form
   g. Supplier Third Party Audit
   h. Supplier Security Letter
   i. Vendor Information Form
   j. Vendor Master Form
   k. Environmental Sustainability Procedure
   l. Ethical Sourcing Program for Suppliers and Subcontractors
   m. All documentation requested through TraceGains must be posted. All suppliers must be registered and all approved locations added to TraceGains. Supplier should take good faith efforts to ensure documents do not have viruses or other infections before uploading them into TraceGains.

   The above list of documents may be updated and revised by Hood as needed. The supplier must sign and return to Hood the documents in order to become an approved new supplier.
5. Inform receiving plant of identity of new supplier, effective date, sales representative, customer service representative, technical representative, other material specifics, and trial period for packaging.

23. HP Hood LLC's Statement on Compliance with California Transparency in Supply Chains Act of 2010

HP Hood LLC is working to eradicate slavery and human trafficking from its direct supply chain. At present time, this verification is conducted in-house and not by an independent third party. As a part of this verification, HP Hood LLC takes the following actions:

- HP Hood LLC maintains internal accountability standards and procedures for its employees and contractors who might fail to meet HP Hood LLC's standards regarding slavery and trafficking.

- HP Hood LLC provides its employees and management who have direct responsibility for supply chain management with training on human trafficking and slavery, particularly with respect to mitigating risks within HP Hood LLC's product supply chains.

- HP Hood LLC audits its direct suppliers to evaluate their compliance with HP Hood's standards prohibiting trafficking and slavery in its supply chains. At the present time, these audits are conducted in-house and are not independent unannounced audits.

- HP Hood LLC requires each of its direct suppliers to certify in writing that all supplied goods and materials comply with all laws regarding slavery and human trafficking of all countries in which each direct supplier is doing business.

By accepting this Supplier Expectations Manual, you are certifying that you have received and reviewed this Statement and that, at the time of supplying any items, goods, materials or products to HP Hood LLC, you will be in full and complete compliance with the California Transparency in Supply Chains Act of 2010, as well as with all laws concerning slavery and/or human trafficking enacted in every country and jurisdiction in which you are doing business.

24. Resources/Links

Below are links to various resources for supplier's reference. This list is not intended to provide binding advice nor does it replace the supplier's obligation to review and comply with all applicable laws and regulations.

FOOD MANUFACTURERS

General Information

FDA Basics for Industry:
http://www.fda.gov/ForIndustry/FDABasicsforIndustry/default.htm

How to Start a Food Business:
http://www.fda.gov/Food/ResourcesForYou/Industry/ucm322302.htm

Food & Color Additives:
http://www.fda.gov/food/ingredientspackaginglabeling/foodadditivesingredients/default.htm

Food Defense and Emergency Response Training

ALERT, Employees FIRST, Food Security Awareness:
http://www.fda.gov/Food/FoodDefense/default.htm

Food Defense Plan Builder:
http://www.fda.gov/food/fooddefense/toolseducationalmaterials/ucm349888.html

CURRENT GOOD MANUFACTURING PRACTICES - 21CFR PART 117

http://www.ecfr.gov

ORA FOIA Electronic Reading Room (frequently requested 483s and EIRs):
http://www.fda.gov/AboutFDA/CentersOffices/OfficeofGlobalRegulatoryOperationsandPolicy/ORA/ORAElectronicReadingRoom/default.html

Warning Letter Database:
https://www.fda.gov/inspections-compliance-enforcement-and-criminal-investigations/compliance-actions-and-activities/warning-letters

FOOD LABELING

Food Allergen & Gluten-Free Labeling:
http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/Allergens/default. html

Food Labeling Claims:
https://www.fda.gov/food/food-labeling-nutrition/label-claims-food-dietary-supplements

Food Labeling Guide – English, Spanish, Chinese, Japanese, Hindi, Arabic:
http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/LabelingNutrition
/ucm2006828.html

Food Labeling: Revision of the Nutritional and Supplemental Facts Labels:
https://www.regulations.gov/document?D=FDA-2012-N-1210-0875

Small Business Nutrition Labeling Exemption:
http://www.fda.gov/food/guidanceregulation/guidancedocumentsregulatoryinformation/labelingnutrition/ucm 2006867.htm

FDA Food Safety Modernization Act:
http://www.fda.gov/Food/GuidanceRegulation/FSMA/default.htm

HACCP

Hazard Analysis Critical Control Point (HACCP) – Seafood, Juice, Dairy:
http://www.fda.gov/Food/GuidanceRegulation/HACCP/default.htm

IMPORTS & EXPORTS

FDA Certificates of Export:
http://www.fda.gov/regulatoryinformation/guidances/ucm125789.htm

DUNS #:
http://www.dnb.com/get-a-duns-number.html

Import Alerts:
http://www.fda.gov/ForIndustry/ImportProgram/ActionsEnforcement/ImportAlerts/default.htm

Import Program FDA:
http://www.fda.gov/ForIndustry/ImportProgram/default.htm

Prior Notice of Imported Food:
http://www.fda.gov/Food/GuidanceRegulation/ImportsExports/Importing/ucm2006836.htm

INSPECTION & ANALYSIS

Bacteriological Analytical Manual:
http://www.fda.gov/food/foodscienceresearch/laboratorymethods/ucm114664.htm

Compliance Manuals and Programs:
http://www.fda.gov/ICECI/ComplianceManuals/default.htm

Electronic Code of Federal Regulations:
http://www.ecfr.gov

Guidance for Low Acid Canned Foods:
https://www.fda.gov/food/guidance-documents-regulatory-information-topic-food-and-dietary-supplements/acidified-low-acid-canned-foods-guidance-documents-regulatory-information

RECALLS

Industry Guidance for Recalls:
https://www.fda.gov/safety/recalls-market-withdrawals-safety-alerts/industry-guidance-recalls

Recalls, Market Withdrawals & Safety Alerts:
http://www.fda.gov/Safety/Recalls/default.htm

Reportable Food Registry:
http://www.fda.gov/Food/ComplianceEnforcement/RFR/default.htm

Registration of Food Facilities:
http://www.fda.gov/food/guidanceregulation/foodfacilityregistration/default.htm

25. Definitions

The definitions set forth herein are intended to assist supplier in understanding this Manual. In the event that these definitions conflict with defined terms in any applicable law or regulation, supplier's contract with Hood, or any of the documents in Hood's New Supplier package, referred to in Section 22 above, the applicable defined terms shall control over the definitions in this Manual.

Allergen: An adverse response by the body to foods containing allergenic proteins. Only a very small amount of the protein can trigger a reaction and it can vary from mild reactions to death.

Assisted Cleaning System (ACS): The method of cleaning product contact surfaces by circulating, spraying, or flowing chemical solutions and water rinses into or over the surfaces being cleaned.

Bill of Lading (BOL): A detailed list of a shipment of goods in the form of a receipt given by the carrier to the person consigning the goods.

Certificate of Analysis (COA): A signed document that contains the microbiological, chemical, or physical test results for each lot that is provided to the customer by the supplier to ensure the product meets the customer specifications.

Clean In Place (CIP): The method of cleaning the interior surfaces of pipes, vessels, process equipment, and associated fittings without disassembly of the equipment.

Clean Out of Place (COP): The method of cleaning equipment items by removing them from the operational area and taking them to a designated area or station for cleaning.

Corrective Action Program: A program put in place to identify non-conformities and taking actions to eliminate the root cause.

FDA: The United States Food and Drug Administration.

Food Safety Plan: A written set of documents that is based on food safety principles, which incorporates hazard analysis, preventive controls, supply-chain programs, and a recall plan. The Food Safety Plan delineates the procedures to be followed for monitoring, corrective actions, and verification.

Food Quality Plan: A written set of documents that specify quality standards, practices, resources, specifications, and the sequence of activities relevant to a particular product.

Food Safety Modernization Act (FSMA): The Food Safety Modernization Act signed it into law on January 4, 2011, as amended from time to time.

Foreign Supplier Verification Program (FSVP): The FDA FSMA rule on Foreign Supplier Verification Programs (FSVP) for Importers of Food for Humans and Animals.

Global Food Safety Initiative (GFSI): An international program that began through the collaboration of leading manufacturers, retailers, and food service organizations to drive safety throughout the food supply chain. Certain food safety standards are referred to as GFSI, such as SQF, BRC, etc.

Good Manufacturing Practices (GMP): The conditions and practices that the industry must follow for processing safe food under sanitary conditions, including personnel, plant and grounds, sanitary facilities and controls, equipment and utensils, processes and controls, warehousing, and distribution.

High-Risk Product: A food ingredient or product where there is a high risk of growth for pathogenic microorganisms that has been determined by a documented risk assessment, which includes intrinsic and extrinsic factors. This also includes ingredients/products that are added after the post-kill step in the customer's facilities.

Ingredient Supplier: A company whose finished product is an ingredient that will be used by another company to produce their finished product.

Market Withdrawal: The voluntary removal of products from distribution that do not meet a company's own quality specifications but pose no health or safety risks to consumers.

Potable Water: Water that is safe for human consumption.

Pre-requisite Programs: Procedures, including GMPs, which provide the basic environmental and operating conditions necessary to support the Food Safety and Food Quality Programs.

Preventive Controls Qualified Individual (PQCI): A qualified individual who has successfully completed training in the development and application of risk-based preventive controls at least equivalent to that received under a standardized curriculum or is otherwise qualified through job experience to develop and apply a food safety system.

Quality Management System (QMS): A set of policies, processes, and procedures required for planning and execution (production/development/service) to assure quality control in the core business area of an organization.

Recall: When a product is removed from the market or a correction is made to the product because it is either defective or potentially harmful.

Regulatory Agencies: Government agencies that have legal jurisdiction over the ingredient/product. This can include the FDA or USDA on the federal level. States, Provincial or local governments also may have jurisdiction over where the products are produced, stored, or distributed.

Rework: Clean, unadulterated food that has been removed from processing, other than due to insanitary conditions, or that has been successfully reconditioned by reprocessing, and that is suitable for use as food.

Risk Assessment: A documented evaluation of the potential food safety hazards associated with a process step, operational practice, or environmental condition. The evaluation typically lists the hazards, evaluates the severity and risk level, and outlines the control steps needed to mitigate the risks to an acceptable level.

Safety Data Sheets (SDS): Formally called Material Safety Data Sheets (MSDSs), are summary documents that provide information about the hazards of a product and advice about safety precautions. The manufacturer or supplier of the product usually writes SDSs.

Validation: "Obtaining and evaluating scientific and technical evidence that a control measure, combination of control measures, or the food safety plan as a whole, when properly implemented, is capable of effectively controlling the identified hazards." - 21CFR 117.3

Verification: The action of checking or proving the accuracy of a monitoring activity. "[T]he application of methods, procedures, tests and other evaluations, in addition to monitoring, to determine whether a control measure or combination of control measures is or has been operating as intended and to establish the validity of the food safety plan" – 21CFR 117.3

26. Supplier's Statement Of Agreement

By signing below, the undersigned hereby acknowledges and agrees to the terms of the HP Hood LLC Supplier Expectations Manual, Revision Date November 30, 2021, including the Statement on Compliance with California Transparency in Supply Chains Act of 2010. The undersigned further certifies that the signatory is duly authorized to execute the HP Hood LLC Supplier Expectations Manual and bind supplier to the obligations and agreements contained herein. Supplier's agreement to this Supplier Expectations Manual shall remain in effect for so long as supplier is supplying any good or articles to Hood and, thereafter, for a period equal to any applicable statute of limitations.

Supplier Name: _____

Print Name: _____

Title: _____

Signature: _____

Date: _____