

Supplier Assurance Audit - Distribution

| Company Information | Audit Information |
|--|---|
| <p>Facility: C0052656 - Keele Warehousing & Logistics</p> <p>Address: 90 Summerlea Road Brampton , Ontario Canada, L6T 4X3</p> <p>Contact: Mr. James Appelbe</p> <p>Title: President</p> <p>Phone: 416-937-8006</p> <p>Fax: 416-244-8201</p> <p>Email: james@keelewarehousing.com</p> | <p>Audit# - Visit#: 2230547 - 1766048</p> <p>Audit Type: SADCPR - Supplier Assurance Audit - Distribution</p> <p>Template Version: 1</p> <p>Audit Category: REGULAR</p> <p>Auditor: Gurpreet Sodhi</p> <p>Audit Start Time: 10-JAN-2020 07:55:00 AM</p> <p>Audit End Time: 10-JAN-2020 04:55:00 PM</p> <p>Prior Audit Date: 21-DEC-18</p> |

Explanation of Section Scorings (below)

Section scorings in the below table are provided as a reference and are calculated on the following formula:

| | |
|-----------------------|------------------------------|
| Non-Conformance | Deduction of 5% per finding |
| Major Non-Conformance | Deduction of 25% per finding |
| Critical | 0% |

| Summary By Section | | | | |
|---|-----------------|-----------------------|----------|---------|
| Section Name | Non-Conformance | Major Non-Conformance | Critical | Score |
| Section A - Administration and Regulatory Compliance | 0 | 0 | 0 | 100.00% |
| Section B - HACCP Management | 0 | 0 | 0 | 100.00% |
| Section C - Facilities and Equipment | 0 | 0 | 0 | 100.00% |
| Section D - Sanitation, Housekeeping and Hygiene | 0 | 0 | 0 | 100.00% |
| Section E - Rodent and Pest Control Management | 0 | 0 | 0 | 100.00% |
| Section F - Approved Suppliers, Receiving and Inventory Control | 0 | 0 | 0 | 100.00% |
| Section G - Process and Product Evaluation | 0 | 0 | 0 | 100.00% |
| Section H - Packaging and Labeling | 0 | 0 | 0 | 100.00% |
| Section I - Storage and Shipping | 0 | 0 | 0 | 100.00% |
| Section J - Training Requirements | 0 | 0 | 0 | 100.00% |
| Section K - Food Defense | 1 | 0 | 0 | 95.00% |

Explanation of Overall Audit Result (below)

The overall score result is based on the total number and level of non-conformances. The audit is allocated 100% and deductions made as follows:

- Non-Conformance = 1% deduction per finding off the total score
- Major Non-conformance = 10% deduction per finding off the total score
- Critical Non-conformance = 25% deduction per finding off the total score

| Scoring Guide | |
|--------------------------------|----------------|
| Final Audit Rating | Based on Score |
| Meets Expectations | 100-95% |
| Needs Improvement | 94.99-85% |
| Significant Improvement Needed | 84.99-76% |
| Fail | ≤ 75.99% |

| Overall Audit Result | |
|----------------------|---------|
| Grade Rule Result | % Score |
| Meets Expectations | 99.00% |

| Present at Audit | | | | | |
|---|-----------|-----------------|-----------------|------------------|-----------------|
| Name | Job Title | Opening Meeting | Site Inspection | Procedure Review | Closing Meeting |
| James Appelbe; President, Gurpreet Sodhi; Lead Auditor. | President | Yes | Yes | Yes | Yes |

| GENERAL INFORMATION | |
|---------------------|--|
| No | Question/Notes |
| 1.1 | <p>Facility and Operations Description.</p> <p>Auditor's Notes: The site is an ambient storage warehouse of 100, 000 sq. ft area located in prominent area of Brampton, Ontario. The facility provides services like storage and warehousing mainly to the food processors and food manufacturers. Approximately 20 employees working in the warehouse. The warehouse is cleaned , organized and well managed. The operations run a single shift from 7:00 AM to 6:00 PM. The main operational steps include receiving, storing, picking and shipping of the product.</p> |
| 1.2 | <p>Regulatory Inspection Type and Establishment #:</p> <p>Not Applicable. Site is an ambient storage facility providing service for processors and manufacturers.</p> |
| 1.3 | <p>Products warehoused/produced at this facility.</p> <p>Numerous products and non food products like cleaning chemicals, boiler chemicals etc.</p> |
| 1.4 | <p>The following departments and individuals participated in the audit process:</p> <p>President, Office Administrator and Warehouse Supervisor.</p> |
| 1.5 | <p>Notes from Auditor</p> <p>Information were gathered as the questions were reviewed. Minimal notes were taken during site tour. During site tour warehouse supervisor, food handling employee and shipper and receiver were interviewed. Practices like hand sanitizing, loading. unloading and storage practices were observed during facility walk through.</p> |

| Non-Compliance Summary | | |
|------------------------|---|------------------|
| No | Question/Notes | Result |
| Section K/K.3 | <p>Facility <i>See NCR: The driver entrance doors located at receiving and shipping docks were observed open during the audit.</i></p> | Non-Conformance* |

| Section A. Administration and Regulatory Compliance | | |
|---|--|------------|
| No | Question/Notes | Result |
| A.1 | <p>Organization and Responsibilities</p> <p><i>An organizational chart is documented, and it outlines the structure of staff having responsibilities for Operations and HACCP Management . The Chart was signed by President of company. The QA staff is not required at the facility. This is an ambient storage facility. The product is released by customer and site shipped the product as per customer requirements. The record of each shipment is maintained by site.</i></p> | Acceptable |
| A.2 | <p>Policies and Procedures Manual</p> <p><i>A Quality System Management Master Manual has been developed, documented and maintained in hard copy. The manual contains all policies and procedures required for operations. The staff has access to Manual through their supervisors and managers. The staff is trained on policies on hire and during annual refresher trainings.</i></p> | Acceptable |
| A.3 | <p>Management Awareness and Commitment</p> <p><i>The site has written a Quality Statement. It was displayed at employee entrance on notice board. The president is fully aware and involved in day to day operations.</i></p> | Acceptable |
| A.4 | <p>Product Identification, Traceability and Recall Plans and Procedures</p> <p><i>Site has documented and implemented policy GMP-09/01 Traceability and Mock Recall Program. It contains the information and contact details of Recall Team. The information of appropriate regulatory contacts and customers was also available and observed current during the audit. In last year, two mock recall exercises for two products of different customers were conducted by site. Records of Mock Exercises conducted were reviewed during the audit and found satisfactorily. On Site Mock Traceability of one of the Product was initiated by auditor during the audit. The site was able to trace the 100% of product in less than 30 minutes</i></p> <p><i>Reviewed:</i> <i>Tally Sheet dated 1/10/20 from PLD32906.</i> <i>BOL S148682 dated 01/02/20</i> <i>BOL S148681 dated 01/02/20.</i></p> | Acceptable |
| A.5 | <p>Regulatory Compliance</p> <p><i>There are no regulations required at site.</i></p> | Acceptable |
| A.6 | <p>Document and Records Management</p> <p><i>A list of all Procedures, Checklists, etc. is available in Table of Contents of manual. Standard Operating Procedure GMP 08/01 Control of Document and GMP 08/02 Control of Records outlines the requirements for controlling documents and records. As per company policies all records are retained by site for six fiscal years.</i></p> | Acceptable |
| A.7 | <p>Change Management</p> <p><i>The document entitled GMP 08/01 Control of Document outlines the procedure to manage the changes of documents. All revisions were observed recorded on the "Document Control List".</i></p> | Acceptable |
| A.8 | <p>Documentation to Track Effectiveness of Policies</p> <p><i>Site has documented the responsibilities of conducting Internal Audit in SOP entitled GMP 10/01 Inspections, Audits and Evaluation Program. The Schedule of internal audit was available and internal audits were done as per schedule. Internal audit was conducted on 10/02/19, 11/25/19, 11/26/19 and 12/27/19.</i></p> | Acceptable |
| A.9 | <p>Crisis and Natural Disaster Management</p> <p><i>The site's written Crisis and Natural Disaster Management Plan is found in document entitled GMP 06.04 Continuity of Operations / Crisis Response Plan . The Plan has been implemented and addresses serious disaster threats to the extended interruption of the business. The threats like Natural disasters, illness sewer / drain backup have been evaluated with mitigation plans in place. The crisis team training record was reviewed. Team contact information , emergency contacts and regulatory contacts were documented and found displayed on notice board. Crisis Management team was trained on 11/08/19.</i></p> | Acceptable |
| A.10 | <p>Customer/Consumer Complaints (Policies, Follow Up and Response)</p> <p><i>The site's written Complaint policy is found in the document GMP 12/01 Customer Communication and Feedback. It defines the methods and responsibilities for handling customer complaints and has been implemented. No consumer complaints would be received as site does not manufacture the product. No food safety complaints were recorded for last year. Site is a storage facility only. All complaints are of service type such as short / over shipped, released wrong lot number, shipped extra pallet. The customer dictates all requirements for filling orders and shipping destination. To summarize customer, own the products all the time, site offer only rental storage services to the customers. Records of service related complaints were reviewed during the audit and found that the necessary corrective actions were taken by site.</i></p> | Acceptable |

| Section B. HACCP Management | | |
|-----------------------------|--|------------|
| No | Question/Notes | Result |
| B.1 | Preliminary HACCP Tasks <i>A detailed HACCP Plan was documented. The HACCP Plan been prepared in accordance FSEP guidelines of CFIA. A multi-disciplinary HACCP Team has been identified and trained. The process flow has been verified by the President. The process flow diagram includes steps like receiving, storing , handling and shipping. The product descriptions, facility diagram, incoming material and hazard analysis is documented in HACCP Plan.</i> | Acceptable |
| B.2 | Hazard Analysis (HACCP Principle 1) <i>The site is an ambient storage facility only for food products and non- food products. The Hazard Analysis includes hazards likely to occur and states the programs with control measures.</i> | Acceptable |
| B.3 | Critical Control Points (HACCP Principle 2) <i>There are no CCP's.</i> | N/A |
| B.4 | Critical Limits (HACCP Principle 3) <i>There are no CCP's.</i> | N/A |
| B.5 | CCP Monitoring (HACCP Principle 4) <i>There are no CCP's.</i> | N/A |
| B.6 | Corrective Actions (HACCP Principle 5) <i>There are no CCP's.</i> | N/A |
| B.7 | Verification and Validation (HACCP Principle 6) <i>There are no CCP's. HACCP plan was verified on 12/27/19.</i> | Acceptable |
| B.8 | Documentation and Record Keeping (HACCP Principle 7) <i>There are no CCP's. All adequate records are maintained by site.</i> | Acceptable |

| Section C. Facilities and Equipment | | |
|-------------------------------------|--|------------|
| No | Question/Notes | Result |
| C.1 | Potable Water, Ice, Backflow Prevention, Steam and Waste Water Management <i>The water is used for Cleaning floors , Handwashing and in the employee facility like washroom and lunchroom. Water is not used in the process. No test is required. A copy of municipal water testing report was in file and observed current during the audit. Water Potability Report of June 2019 from municipality was available and reviewed.</i> | Acceptable |
| C.2 | Facility Construction and Design <i>The facility is an ambient warehouse storing food products and non-food products. The structure is in good condition with no unprotected openings / vents through exterior walls. Floors are constructed of smooth and dense impact resistant material and properly graded for effective drainage .Site does not use water in any process. Few drains were present in the facility .These were observed to be located and constructed for ease of cleaning and inspection.</i> | Acceptable |
| C.3 | Facility Condition (Walls, Ceilings, Floors, etc.) <i>Walls, ceilings and doors are of durable construction with smooth and light colored surfaces and were observed to be clean during the audit tours. The facility interior was observed to be well organized and 5S was maintained. Racking is used throughout. Racks were observed cleaned and found in cleaning schedule.</i> | Acceptable |
| C.4 | Employee Facilities <i>Employee facilities include washroom, lunchroom and locker room. All area was cleaned and adequately ventilated. Separate washroom was available for male and female staff members. Microwaves, fridge and lunch tables were observed cleaned during the audit.</i> | Acceptable |
| C.5 | Handwashing Facilities <i>Hand wash basins are located in washrooms. Hand wash sinks are made of non-corrosive materials and supplied with tempered potable water. Soap in a fixed dispenser, paper towels and waste containers are available. Hands sanitizers were installed at different locations of warehouse. Employees were observed to wash and sanitize their hands properly during the audit.</i> | Acceptable |
| C.6 | Equipment Layout, Design and Conditions <i>Site is an ambient storage facility. No processing or manufacturing occurs. The only equipment available are forklifts and floor scrubbers.</i> | Acceptable |
| C.7 | Plant Lighting and Protection <i>All lighting is recessed into the ceiling and are protected. Adequate intensity of lights was observed in the Warehouse Storage.</i> | Acceptable |
| C.8 | Maintenance Standard (Support of GMPs, Housekeeping, Lubricants) <i>The facility is well maintained and organized. All maintenance to equipment and facility is provided by contracted service providers. Internal audits are done annually using an extensive checklist throughout the year. Periodic Maintenance and Maintenance Checklist was conducted on 01/01/20. Warehouse Inspection was done on 12/09/19. Master Sanitation schedule was available, reviewed and found current.</i> | Acceptable |

| Section D. Sanitation, Housekeeping and Hygiene | | |
|---|---|------------|
| No | Question/Notes | Result |
| D.1 | <p>Master Sanitation Schedule and Monitoring <i>Site has documented responsibilities, frequency and verification activities of cleaning and sanitation in SOP entitled GMP 03/01 Cleaning and Sanitation Program. A periodic and Maintenance Checklist is used by warehouse manager to record that daily, weekly, monthly, etc. cleaning has been done. Monthly inspection of warehouse is conducted by trained personnel. Records of monthly inspections were observed maintained during the audit</i> Reviewed: GMP-03/01 Good Warehousing Practices Manual WI-07 Cleaning and Sanitation Program Procedures.</p> | Acceptable |
| D.2 | <p>Standard Sanitation Operating Procedures and Monitoring <i>SOP entitled GMP 03/01 Cleaning and Sanitation Program is documented. The SOP consist of procedure and frequencies and responsibilities of performing periodic cleaning activities.</i></p> | Acceptable |
| D.3 | <p>Cleaning Chemical and Sanitizer Control <i>No chemicals are used for cleaning. Racking is wiped by damp clothes.</i></p> | N/A |
| D.4 | <p>Pre Operational Monitoring and Corrective Action <i>Site is not manufacturing. No processing occurs at facility. Pre-operational does not require to be conducted.</i></p> | N/A |
| D.5 | <p>Verification of Cleaning Effectiveness <i>Only visual inspection is required and was documented. Minimal cleaning is required. Site was observed cleaned during the site inspection.</i></p> | Acceptable |
| D.6 | <p>Operational Housekeeping and Monitoring <i>Facility was observed clean and organized. Landscaping was done at exterior of site.</i></p> | Acceptable |
| D.7 | <p>Personal Hygiene and Good Manufacturing Practices <i>Employees are prohibited from working in warehouse areas when suffering from infectious and communicable diseases or have exposed cuts, sores or lesions. Employee interviews confirmed that employees are trained in good manufacturing practices and are knowledgeable of the requirements. Food is allowed only in lunchroom and office areas. Site has designated areas outside the facility for smoking. The smoking zone was observed cleaned during the audit.</i></p> | Acceptable |
| D.8 | <p>Internal Audits and Corrective Actions <i>Site has documented the responsibilities of conducting Internal Audit in SOP entitled GMP 10/01 Inspections, Audits and Evaluation Program. The Schedule of internal audit was available and internal audits were done as per schedule. Internal audit was conducted on 10/02/19, 11/25/19, 11/26/19 and 12/27/19.</i></p> | Acceptable |

| Section E. Rodent and Pest Control Management | | |
|---|---|------------|
| No | Question/Notes | Result |
| E.1 | <p>Documented and Specific Pest Control Program <i>A policy entitled GMP 04/01 Pest Control Program defines the methods and responsibilities for integrated pest management and has been effectively implemented. The premises were free of waste and debris as observed during the interior and exterior tours. A Pest Control Operator has been contracted for pest management and an updated scope of service defines the methods of pest control, frequency of interior and exterior inspections and targeted pests. The binder is maintained by third party and contains current site map, showing the location of external and internal devices. Pest control map was updated and reviewed on 01/1/20. A pesticide application log gives details and dates of all chemical usage. Licenses of the Pest Control Operator from local authorities are current and indicate employees are trained and competent. A list of chemicals used by the Pest Control Operator is found in pest control binder and includes SDS information. Inspection activity reports are signed by a management representative after visits and were reviewed and found to be completed as scheduled. Any observations or issues highlighted by the Pest Control Operator are addressed and documented by the supplier. Last Inspection was done on 01/07/20. As verification Pest Control Inspection done on bi-weekly basis by site Food Safety Coordinator. Last in house biweekly inspection was conducted on 02/10/20.</i></p> | Acceptable |
| E.2 | <p>Outside Premises Management (Grounds, Waste Disposal Areas) <i>The exterior of the property was observed well managed. No debris were observed. The smoking zone was cleaned. All doors have good seals.</i></p> | Acceptable |
| E.3 | <p>Inside Premises Management <i>Interior of facility observed cleaned. Cleaning was done as per Master Sanitation Cleaning Schedule.</i></p> | Acceptable |
| E.4 | <p>Pest Tight Doors and Entrance Closures <i>Windows, doors and other openings are sealed to prevent any pest infestation or dust coming into the facility. Personnel access doors are self-closing and sealed to prevent any pest infestation. External doors and dock doors were sealed to prevent infestation. Electric insect devices, interior and exterior rodent stations are located so product is not at risk for contamination. Bait is only</i></p> | Acceptable |

| Section E. Rodent and Pest Control Management | | |
|---|--|------------|
| No | Question/Notes | Result |
| | <i>used on the outside of the facility.</i> | |
| E.5 | Secure Storage and Documentation of Pest Related Chemicals <i>No pest control chemicals are stored at site. The PCO of third party brought the chemical based on the requirements.</i> | N/A |
| E.6 | Detailed Activity Reports with Corrective Actions <i>PCO filled the service report. The detailed computer generated reports are then emailed later and observed complaint.</i> | Acceptable |

| Section F. Approved Suppliers, Receiving and Inventory Control | | |
|--|---|------------|
| No | Question/Notes | Result |
| F.1 | Supplier Approval Policies and Procedures <i>The business does not require implementation of this procedures. Site is an ambient storage facility and offer rental storage space to manufacturer. List of customers of site was available during the audit.</i> | N/A |
| F.2 | Incoming Vehicle Inspection and Documentation <i>The methods and responsibilities of inspecting the incoming and outgoing was documented in policy entitled GMP 02/01 Receiving and Shipping Requirements. Incoming and outbound records were reviewed, records of vehicle inspection were documented</i> | Acceptable |
| F.3 | Release Criteria for Ingredients <i>Products in storage are shipped to customers according to customer requirements. The customer determines the product, quantity, lot number to be shipped. If no lot number is mentioned by customer, warehouse follows FIFO system for shipping the product.</i> | Acceptable |
| F.4 | Storage and Handling Policies and Practices <i>Site has written storage and handling policies documented SOP entitled GMP 02/02 Storage, Handling and Inventory Control Procedures. As per policy, chemical storage is separated by food storage area. Control measures implemented for storage plan were observed satisfactorily during the audit.</i> | Acceptable |
| F.5 | Bulk Receiving Systems Sanitation and Monitoring <i>Site does not handle bulk receiving.</i> | N/A |
| F.6 | Restricted and/or Sensitive Ingredient Control, Including Chemical Compounds <i>As per policy, chemical storage is separated by food product storage area. Control measures implemented for storage plan were observed satisfactorily during the audit.</i> | Acceptable |

| Section G. Process and Product Evaluation | | |
|---|--|--------|
| No | Question/Notes | Result |
| G.1 | Process Control and Documentation Procedures <i>No processing occurs at this facility.</i> | N/A |
| G.2 | Specification and Formulation Control and Accuracy <i>No processing occurs at this facility.</i> | N/A |
| G.3 | Routine Calibration of Operational Equipment and Measuring Devices <i>No processing occurs at this facility.</i> | N/A |
| G.4 | Foreign Material Control <i>No processing occurs at this facility.</i> | N/A |
| G.5 | Application of Statistical Control <i>No processing occurs at this facility.</i> | N/A |
| G.6 | Allergen and Sensitive Ingredient Controls <i>No processing occurs at this facility.</i> | N/A |
| G.7 | Specification Compliance Documentation <i>No processing occurs at this facility.</i> | N/A |
| G.8 | Rework and Carryover Products <i>No processing occurs at this facility.</i> | N/A |
| G.9 | Analytical Records Management <i>No processing occurs at this facility.</i> | N/A |

| Section H. Packaging and Labeling | | |
|-----------------------------------|---|--------|
| No | Question/Notes | Result |
| H.1 | Label Accuracy and Regulatory Compliance <i>Site only shipped the product for its customer. This compliance is not verified by site. Customer is responsible for regulatory compliance.</i> | N/A |
| H.2 | Documented Net Weight or Count Compliance Policy and Performance <i>Site does not require to measure Net weight or count compliance. Site is an ambient storage</i> | N/A |

| Section H. Packaging and Labeling | | |
|-----------------------------------|---|--------|
| No | Question/Notes | Result |
| | <i>facility.</i> | |
| H.3 | Clear Manufacturing Codes on Individual and Cased Product <i>No processing occurs at facility. Customer are responsible for manufacturing codes requirements.</i> | N/A |
| H.4 | Package Integrity and Function <i>No processing occurs at facility. Site does not do any tempering with packaging material.</i> | N/A |
| H.5 | Label Security and Obsolete Label Controls <i>No processing occurs at facility. Customers are responsible for label security and label control. Nature of business is to store and shipped the customer products in Food Safe manner.</i> | N/A |

| Section I. Storage and Shipping | | |
|---------------------------------|--|------------|
| No | Question/Notes | Result |
| I.1 | Warehouse and Finished Product Management <i>Warehouse was observed cleaned and well organized. Storage plan was effectively implemented. The food storage areas are separated by chemical storage areas. All allergen containing products are identified by manufacturer and labeled accordingly. GMP 05/01 Allergen Control Program was implemented by site. Employee were aware of Site storage plan and allergen management policy. This was confirmed during interviewing receiver, shipper and warehouse supervisor.</i> | Acceptable |
| I.2 | Retained and Returned Products <i>Returned product is accepted back at receiving dock. It is tagged, hold and investigated. Records required to maintained. Returned product is stored, shipped or disposed of as per customer written request.</i> | Acceptable |
| I.3 | Storage Facility and Dock Maintenance <i>All products are stored at ambient temperature. No product requires refrigeration of any kind. All products are stored in racking. Food products are stored and observed stored separately from chemicals during the audit.</i> | Acceptable |
| I.4 | Transport Condition <i>All incoming and outbound vehicle are inspected prior to unloading and loading respectively. GMP 02/01 Receiving and Shipping Requirements and GMP 02/02 Storage handling & Inventory Control Procedures are documented and implemented.</i> | Acceptable |
| I.5 | Release Authorization to Ship Product <i>Product is released by customer. Site receive the product details, shipping details and name of consumer where product to be shipped from customer. Shipping records are maintained by site.</i> | Acceptable |

| Section J. Training Requirements | | |
|----------------------------------|---|------------|
| No | Question/Notes | Result |
| J.1 | New Hire Training <i>Site has procedure to trained new hires. It is documented on policy entitled GMP 07/01 Training and Human Resource development. As per procedure all new hires are required to trained on policies, procedures and personnel practices during orientation. Site also conduct math test, oral interview and a short practical skill test as part of hiring procedure. Training records of new hires are maintained by site.</i> | Acceptable |
| J.2 | Training Language <i>All trainings is provided by English.</i> | Acceptable |
| J.3 | Prerequisite Program Training <i>All employee is trained on implemented PRP. Note: Site is an ambient storage facility. PRP,s includes basic GMP's and Cleaning & Sanitation Practices.</i> | Acceptable |
| J.4 | Refresher Training <i>Annual refresher training is conducted by site. Records of annual refresher training is maintained by site.</i> | Acceptable |
| J.5 | Proof of Knowledge <i>Knowledge of employee is tested by Trainer or immediate supervisor. Employee working at facility was observed trained on the daily job. Unloading practices were observed during the audit. It was noted during the audit that the employee performing unloading activities follows the company guidelines.</i> | Acceptable |
| J.6 | Training Records <i>Training records were maintained by site. Training records of Shipper/ receiver were checked and found satisfactorily.</i> | Acceptable |
| J.7 | Training Program Review <i>The training program is reviewed annually as part of annual audit. Updated training program is provided to staff if the change in the programs warrants it.</i> | Acceptable |

| Section K. Food Defense | | |
|-------------------------|---|------------------|
| No | Question/Notes | Result |
| K.1 | Management <i>Site has documented and implemented a detailed policy entitled GMP 06/01 Food Defense Program. The food defense team was mentioned in policy and was observed current. The food defense team was trained. A vulnerability assessment was also conducted and documented on Food Defense Program.</i> | Acceptable |
| K.2 | Human Element <i>Access to human facility is restricted. Policy entitled GMP 06/02 Visitors Program outlines the procedures to be followed by visitors. As per policy visitors required to report at front desk. Visitors are required to follow the facility rules including using proper access points, comply with hand sanitizing requirements and not exhibit visible signs of illness if entering warehouse. Visitors are required to accompany with senior management or designee all the time of their visit in storage facility.</i> | Acceptable |
| K.3 | Facility <i>See NCR: The driver entrance doors located at receiving and shipping docks were observed open during the audit.</i> | Non-Conformance* |
| K.4 | Operations <i>An extensive Food Defense Plan and Vulnerability Assessment was documented. The plan includes outside property/ grounds, employees & visitors, the receiving program, building & facility operations, Storage & Shipping.</i> | Acceptable |

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