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*Supplier Food Safety & Quality  
Expectation Manual*

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Raw Ingredient/Co-Manufacturer/Packaging/3<sup>rd</sup> Party  
Ingredient Warehouse

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Dear CJ-Schwans's Supplier,

CJ-Schwans's is committed to cultivating a culture that ensures safe, quality foods. We intend to achieve this goal through consistent programs and continuous improvement of food safety and quality. CJ-Schwans's relies on strong, confidence-based supplier relationships to meet our commitment of delivering safe, quality foods to our customers and consumers. CJ-Schwans's requires our business partners to comply with applicable regulatory requirements and align to industry-leading practices.

It is CJ-Schwans's stance, that all Raw Material Suppliers, Packaging Suppliers, Ingredient Warehousing & Distribution Partners, and Co-Manufacturers (hereinafter "Supplier") understand our Food Safety and Quality requirements, so we partner with companies who share common values and goals. Suppliers who apply our standards and best practices to their processes, reduce the consumer's overall food safety risk and improve the business prospects for all parties. The expectations outlined in this document are essential to effectively manage food safety and quality to our standards at CJ-Schwans's. The expectations which are NOT relevant for packaging suppliers are preferred but not required. Packaging requirements are specific to branded and non-branded packaging for human food use. To accomplish this imperative, we at CJ-Schwans's believe we shall work together with our suppliers to ensure our customers receive a great tasting, safe product. We look forward to partnering with you.

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### **1. Evaluation and Qualification of Supplier**

All companies interested in joining the CJ-Schwan's supplier network shall be subject to an approval and contracting process prior to manufacturing, packing, holding, or filling any product. Suppliers formally agree to CJ-Schwan's expectations and applicable regulatory requirements by signing a Master Service Agreement (MSA). To ensure that safe, quality food is produced, approval is conducted at the manufacturing facility level. Technical and process capabilities may be assessed, and improvement programs required. If approved, the supplier shall be required to subscribe to our company's preferred management software.

### **2. Supplier Approval Statuses and Management**

#### **a. Approval:**

A Supplier shall be awarded one of the following statuses by CJ-Schwan's. CJ-Schwan's retains the right to change a Supplier's status at any time.

#### **i. Approved**

- A. CJ-Schwan's may use a supplier who is in "Approved" status.
- B. To be in "Approved" status, the supplier shall comply with CJ-Schwan's standards and to remain in status, the supplier shall ensure that documentation is updated as required and they are continually meeting CJ-Schwan's standards.

#### **ii. Conditionally Approved**

- A. Conditional approval is used when a supplier has not met all standard requirements or where performance improvement is desired. Reference part g. of this section of the expectations manual regarding exceptions.
- B. Conditions of the approval shall be documented and stored under the supplier's profile in the supplier management system.

#### **iii. Disqualified**

- A. CJ-Schwan's shall not use a supplier who is in "Disqualified" status. A "disqualified" status reflects that a supplier has a severe gap in its food safety and quality programs and/or does not otherwise comply with CJ-Schwan's standards. Operations are suspended and materials are placed on hold. If a supplier wishes to return an "Approved" status they shall go through the CJ-Schwan's approval process again.

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**b. Ongoing Supplier Verification**

- i. CJ-Schwan’s ongoing monitoring and management of suppliers has the following components:
  - A. Periodic audits resulting in formalized corrective action plans; supplier performance to food safety and quality requirements and triggering event management.
- ii. Monitoring Performance
  - A. CJ-Schwan’s shall monitor supplier ongoing performance utilizing various methods. CJ-Schwan’s shall advise each supplier of the methods and other information that is required for monitoring of the supplier. Some examples of documentation and other information that may be required are listed below:
    - 1) Microbiological testing results
    - 2) Contamination testing results
    - 3) Monthly reports on Key Performance Indicators
    - 4) Third-Party Audits
    - 5) Food Safety and Quality Questionnaire/Assessments
    - 6) Management of Change records
    - 7) Complaints
    - 8) Batch Records
    - 9) Process Control charts (Targets/Ranges)

**c. Triggering Event Management**

- i. A “Triggering Event” is an event or circumstance that might cause CJ-Schwan’s to change the Food Safety and Quality status or another component of the management of the supplier. This may be a positive or negative event.
- ii. Examples of triggering events include, but are not limited to, the following:
  - A. Market Action - Product Withdrawal or Recall
  - B. Repeated failure to meet product specifications
  - C. Trends in Key Performance Indicators
  - D. Audit Results
  - E. Regulatory Enforcement Action impacting the production/handling facility
  - F. Change in Regulations or Regulatory Enforcement
  - G. Escalated critical food safety Complaints

**d. CAPA**

- i. Corrective Action or Preventive Actions requested that result from audits, monitoring or triggering events will be assigned by CJ-Schwan’s FSQ via written communication. CAPA requests will include the non-conformance and timeline expectation for response.

**e. Exceptions**

- i. Exceptions to the program may be made on a case-by-case basis and as be authorized and allowed by CJ-Schwan’s Food Safety and Quality department leader’s sole discretion.

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### 3. Required Supplier Documentation

- a. Each prospective facility shall furnish industry standard FSQ and business documents during the evaluation process and on an ongoing basis as documents are renewed. If the prospective facility is unable to furnish required documents, they shall communicate that to their CJ-Schwan's business partner promptly.
- b. The Supplier Evaluation Form (SEF) and the supplier management system shall be used to communicate and outline FSQ document requirements. The requirements list is subject to change. Some examples of document requirements may include, but is not limited to:
  - i. GFSI Certificate
  - ii. GFSI Audit Report
  - iii. HACCP Plan or Food Safety Plan
  - iv. Allergen Questionnaire
  - v. Letter of Guarantee
  - vi. COA example
  - vii. Processing Validation Summary
  - viii. Environmental Monitoring Program
- c. All furnished documents are subject to compliance review.

### 4. Third-Party Food Safety and Quality Accreditation

- a. A current list of GFSI accepted certification for materials in scope can be obtained at [www.mygfsi.com](http://www.mygfsi.com). The certification scheme and scope shall be appropriate i.e., shall include all manufacturing areas relevant for ingredients/packaging supplied to CJ-Schwan's.
- b. The supplier shall share current and renewed audit certificates and reports with CJ-Schwan's to maintain approval.
- c. Minimum acceptable audit scores shall be either "Good",  $\geq 86$ , or equivalent. If an Audit Score is below the minimum acceptable score, CJ-Schwan's shall be notified within 3 days of receipt of the new audit certificate and report.
- d. Once accreditation is achieved, CJ-Schwan's shall be notified immediately if the certificate is surrendered or withdrawn by the certification body.

### 5. Pre-Qualification Corrective Action Plans

- a. If a Supplier is unable to fully comply with key CJ-Schwan's safety and quality requirements during evaluation, the Supplier shall develop a corrective action plan prior to manufacturing products for CJ-Schwan's. CJ-Schwan's shall review the corrective action plan for effectiveness. Failure to effectively close non-conformances, may result in a "disqualification" status by CJ-Schwan's.

### 6. Specifications

- a. Product specifications shall be agreed upon between the Supplier and CJ-Schwan's. Systems shall be established and implemented to demonstrate that product released meets the requirements specified in the agreed upon specification.
- b. Co-manufacturers shall not make ingredient substitutions with poorer specification ingredients, shelf-life extensions, approve production teams to run out of specification, optimize production for costing to target high/low ends of spec ranges, or related activities without written approval from CJ-Schwan's FSQ.
- c. Suppliers unable to fulfill orders with materials that are in specification shall notify CJ-Schwan's promptly.

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## **7. Ingredient Supplier and Co-manufacturer Minimum Expectations**

### **a. Internal Audit Program**

- i. The facility shall conduct internal audit, at planned intervals at their facility based on risk, to determine compliance with their food safety, quality, and regulatory programs. The program shall include monitoring and completion of corrective and preventive actions from internal audit findings, that have been reviewed by the designated members of the Management Team.
- ii. Verification of compliance to GMP guidelines.
- iii. Compliance to established quality system standards.
- iv. Regulatory requirement compliance

### **b. Management Commitment**

- i. The facility producing goods for CJ-Schwan's shall have a documented policy that states the facility's fundamental commitment to producing safe, quality, and legal food.
- ii. Senior management shall have clear objectives that support a food safety and quality culture. Management shall meet at least annually to review their facility's food safety and quality programs. Meetings notes shall be taken along with the inputs and outputs of the meeting. The scope of the meeting includes but is not limited to:
  - A. Results of internal and external audits
  - B. Customer complaints
  - C. Incidents
  - D. Effectiveness of the Food Safety Plan or HACCP
  - E. Resource requirements
- iii. Management shall be present at the opening and closing of CJ-Schwan's Audits. They shall provide resources to ensure gap closures and continuous improvement plans are achieved for CJ-Schwan's products.
- iv. The facility shall ensure responsibilities are defined, documented, and communicated within the company. They shall ensure that programs are established and shall continue in the event of personnel or company changes.

### **c. Food Safety and Quality Management Systems**

- i. A Food Safety and Quality Management System shall be developed and managed by a multi-disciplinary food safety and quality team having specific knowledge of the type of Food Safety and Quality Management System being applied, based on the requirements of the region it operates in as well as knowledge related to the product, processes, and associated food safety hazards. The system shall include:
  - A. Food safety plans shall be reviewed prior to any process, ingredient, equipment, or personnel changes to assure no unforeseen risk addition. Food-safety plans are also required to be reviewed at a frequency of no greater than 12 months.
  - B. A list of current prerequisite programs and supporting documentation shall be available for review in conjunction with the established food safety plan to assure all areas of risk are identified and managed.
- ii. Establish, implement, document, and maintain food safety and quality management systems.
  - A. Food safety plans shall be reviewed prior to any process, ingredient, equipment, or personnel changes to assure no unforeseen risk addition. Food-safety plans are also required to be reviewed at a frequency of no greater than 12 months.
  - B. A list of current prerequisite programs and supporting documentation shall be available for review in conjunction with the established food safety plan to assure all areas of risk are identified and managed.

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- C. Documented employee education on the facility food safety plan is required for new hires and all existing employees on an annual basis. Records of required training shall be available for review by CJ-Schwan's during facility audits.
- iii. Demonstrate programs are effective via documented processes, controls measures, and audit results.
- iv. Facility shall have a current Organizational Chart that is signed and dated and available for review, if requested.

**d. Document Control**

- i. The company shall utilize an effective document control system to ensure only current and correct versions of documentation are available for use in the facility and establish the controls instituted for identification, storage, retrieval, retention, and disposition of records.
- ii. The facility shall maintain an active document register which lists all current forms, procedures, policies, and other documents.
- iii. All documents shall have an indicator of version, update date, and an individual responsible for the document.
- iv. A system shall be in place for the replacement of existing documents when updated.
- v. CJ-Schwan's documents shall be maintained for shelf life of the product plus one year.

**e. Notification of Changes**

- i. Supplier shall have an implemented change management procedures and that includes notification to customers regarding changes. This includes notifying CJ-Schwan's of any changes or modifications to the production location, product specifications, product inputs, and/or process steps that would have an impact on the quality or safety of the delivered product.
  - A. Risk assessment for plant projects that have the potential to affect food safety or quality shall be conducted by the food-safety team in conjunction with others from the facility who have knowledge of plant construction, equipment design, plant operations and microbiological risk factors.
  - B. Any process deemed to have an elevated microbiological risk due to the opening of floors, equipment, ceilings, walls, etc., are required to have increased microbiological testing of the environment conducted during and after the project is completed, as well as, before production resumes.
  - C. Management of change risk assessments and project planning requires food-safety team review and approval.
- ii. Any changes that would potentially affect the food safety or quality of CJ-Schwan's products shall be communicated to CJ-Schwan's Corporate Food Safety & Quality contacts for internal management of change consideration prior to implementation. Applicable notification required changes include, but are not limited to:
  - A. Change to any part of the specification.
  - B. Finished product facility of manufacture shift.
  - C. Critical equipment design change.
  - D. Processing technique modification.
  - E. Process flow modification.
  - F. Packaging related changes.
  - G. Raw material source shift.
  - H. Raw material state change (i.e. fresh vs. frozen).
  - I. Variety/species variation.

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J. Any change that would affect the consumer experience.

**f. Foreign Material Prevention**

- i. Foreign Material Prevention Plan is established with validation of each foreign material control point for all CJ-Schwan's product and includes Inbound Material (food products, packaging), and will address but not be limited to; metal, glass, hard and soft plastic, wood, bones, construction materials, etc. Foreign material detection equipment used will be appropriate to detect and remove suspect foreign material risks.
- ii. Foreign Material Prevention Plan elements include:
  - 1. The plan is written, controlled according to a document control program.
  - 2. A multi-disciplinary team is established to define and review the foreign material plan. Team is represented by all key functions, (i.e. operations, sanitation, engineering, quality assurance, product development, maintenance, and finance/purchasing, etc.).
  - 3. Analysis of ingredients, process, facility, and personnel practices for foreign material risks. These analyses exist in the form of:
    - a. HACCP or Food Safety Plans
    - b. Ingredient Risk Assessments
    - c. Glass and Brittle Plastics Registers
    - d. GMP programs
  - 4. Controls defined for identified foreign material risks
    - a. Includes validation, verification, monitoring, corrective action when control is lost.
  - 5. Pre-operational and facility inspections
    - a. Explicitly requires inspection for temporary repairs, broken, flaking, or missing pieces of the infrastructure or equipment, handling practices or traffic flows which pose a foreign material risk.
  - 6. Tracking/trending and analysis of internal and external observations of foreign materials in your products.
  - 7. CAPA process defined for when a non-conformance with the plan is identified.
- ii. Minimum control expectations
  - 1. Wood pallets used in food processing and handling areas shall be dedicated for the purpose and be subject to a documented/recorded inspection and control program.
  - 2. Metal detection and X-ray
    - a. Metal detector and/or x-ray devices are required unless otherwise approved by CJ-Schwan's FSQ team.
      - i. Screens, filters, and magnets, and other approved alternative methods are regularly monitored with results and corrective actions recorded.
      - ii. Where magnets are used, a minimum strength of 10,000 gauss is required.
      - iii. Approval of alternate devices shall be recorded on the CJ-Schwan's specification.
    - b. For metal detectors and x-ray/imaging devices, verification of sensitivity is conducted by passing the required standards, using ferrous, non-ferrous, and stainless-steel test pieces through the detection and control device.

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Metal Type	Ingredients and Co-manufactured Finished Goods detection capabilities.
Ferrous	2.5mm
Non-ferrous	2.5mm
Stainless Steel (316 grade)	3.0mm

- c. Ground comminuted items such as ground meats must be equipped with bone extraction and an in-line magnet or X-ray system to ensure that bone and tramp metal are identified and removed from the product stream.
- d. Unless other methods are approved, metal detection and x-ray imaging device system testing must be conducted at start-up, at production breaks, after maintenance and when changing products and end of shifts/production.
- e. The foreign object detection verification procedure shall specify physical placement/location for the Foreign Object standards to simulate the conditions of least sensitivity.
- f. Whenever possible, verification of sensitivity is conducted by passing each required standard three times each in the normal flow of the product with the standard at the leading, middle, and trailing edge of the product. The metal detector must detect and positively reject product with the standards.
- g. Acceptable rejection devices should be positioned as close to the final packing of product as possible; the following are acceptable rejection devices:
  - i. Positive rejection - removes contaminated product from the production line to a segregated container.
  - ii. Belt stop - stops the line when contaminated product is detected at the metal detector including a visual or audible alarm. This method should have a documented program on how the system is restarted, and the disposition of suspect product.
- h. If the device fails test, “appropriate action” is for supplier to place all product between acceptable checks on hold and confirm equipment functionality or repair the device. Procedure shall define how product is identified between acceptable checks (e.g. case number, pallet ticket time, cases time on label / bag, inspection time, etc.) Product must be then run through a properly functioning device before release. Any non-conforming CJ-Schwan’s Products are fully documented as per the supplier hold policy and corrective action plan.
- i. A ‘foreign materials found’/ ‘rejection log’ is to be maintained, including details on whether it is a single incident or multiple incidents. This log shall include the following details at a minimum:
  - i. The size and type of foreign material found.
  - ii. The quantity of product affected.
  - iii. Corrective actions including preventative measures to avoid a reoccurrence.
  - iv. Final disposition of the impacted product.

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**g. Regulatory Requirements**

- i. It is the facility’s responsibility to assure supply chain compliance with applicable laws and regulations. Suppliers may be required to comply with certification requirements (e.g. Organic, Kosher, Halal) for specific products or regions of the world.
- ii. Management at the facility shall ensure that employees are trained to manage regulatory inspections and that CJ-Schwan’s Corporate Food Safety & Quality is immediately notified if product released into commerce does not comply with regulatory requirements.
- iii. Supplier shall have a regulatory inspection procedure that outlines requirements if CJ-Schwan’s production samples are pulled for testing:
  - A. Product shall be placed on “Hold” status pending results of the required testing and CJ-Schwan’s Corporate Food Safety and Quality shall be notified within 24 hours.
  - B. If a regulatory authority collects environmental samples, consideration shall be given to how the testing could impact the acceptability of product produced for CJ-Schwan’s. Product shall be placed on “Hold” status and CJ-Schwan’s Corporate Food Safety and Quality shall be contacted for further direction.
  - C. Detailed records of all regulatory inspections, findings, and corrective actions shall be maintained according to the document control requirements.

**h. Quality Requirements & Process Capability**

- i. Supplier shall have programs and processes in place to ensure products are made to meet regulatory guidelines and CJ-Schwan’s specifications as well as provide verification of compliance for incoming raw materials, in process materials, packaging components and finished products.
- ii. Specifications for finished products, raw materials, and packaging components shall be accessible in facility and receive formal review at a frequency of no greater than 36 months.
- iii. Approved visual factory pictures and/or color charts for finished product and critical in process inspection steps are to be accessible on the production line for CJ-Schwan’s production.
- iv. Raw material acceptance programs shall be implemented to verify compliance to specification through either COA analysis or routine internal critical attribute testing. This analysis may be based on risk assessment to determine appropriate levels of verification activities required.
- v. The facility shall ensure that product meets CJ-Schwan’s specification requirements for taste, texture, odor, and appearance (size, shape, color, etc.), includes product and packaging. It is recommended that sensory checks are conducted throughout each production run.
- vi. In process monitoring of critical attributes, product characteristics, and packaging conformance shall be in place to ensure compliance to applicable regulatory guidelines and CJ-Schwan’s specifications.
  - A. Process capability data shall demonstrate that products always achieve specification compliance for labeling content, physical attributes, sensory descriptions, and packaging acceptability as outlined by CJ-Schwan’s product specifications. Process capability data shall be available for review upon request.
  - B. In process testing, plans shall represent the entire run including start up, shutdown, and a maximum of every 60 minutes as part of the sampling set.
  - C. Statistical process control systems are preferred.
  - D. Packaging verification for lines producing over 100 pieces per minute shall have an electronic verification system of the line, an approved multi-level verification plan, or plans to implement electronic verification within the next 24 months.

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- vii. Finished product evaluations for CJ-Schwan's products are required to ensure full compliance to specification. Finished product evaluations shall include verification of physical and sensory attributes and packaging conformity as described in the product specification.
  - A. Any abnormalities, packaging failures, or attributes that do not meet specification shall result in a product hold and notification to a CJ-Schwan's Food Safety & Quality representative for disposition decision.
- viii. The responsibility and methods for releasing products shall be documented and implemented.

**i. Supplier Qualifications**

- i. Supplier shall have an effective supplier qualification program that includes the approval and monitoring of suppliers based on any potential risks from raw materials or packaging to the safety, legality, and quality of the final product.
- ii. The supplier approval process shall include a risk-based analysis of the supplier, the manufacturing or collection process, microbiological risk, physical hazard risk, chemical hazard risk, and radiological risk as well as transportation factors and the location from which the goods would be received. The result of the risk analysis shall apply a rating of risk associated with that raw material or packaging component.
- iii. Risk levels applied to each raw material or packaging component shall classify the required steps for acceptance of that material such as microbiological verification testing, certificate of analysis, certificate of compliance, or physical inspection.
- iv. Approved suppliers shall be approved based on manufacturing location. GFSI qualifying audit or appropriate third-party food safety audit from each supplier location shall be reviewed and kept on file.
- v. The company shall have an established supplier quality verification program in place to monitor product quality from each supplier and show trending of key indicators to ensure continued compliance to specification and food safety standards.
- vi. A list of approved suppliers per facility shall be kept on file.
- vii. Raw materials, packaging materials, and third-party services may only be sourced from approved suppliers. An emergency plan for the acceptance of goods or services from a non- approved supplier which includes risk assessment shall also be in place.
- viii. All approved supplier emergency contacts shall be kept on file for immediate access to supplier facility management teams.
- ix. All raw material and packaging materials shall meet the applicable regulatory guidelines pertaining to the material.

**j. Case Label Requirements**

- i. For product identification purposes, the label shall contain:
  - A. Supplier business name
  - B. Manufacturer address and business name
  - C. Commercial and technical name of products
  - D. List of ingredients in decreasing order of concentration
  - E. Allergen Declaration
  - F. Certification Symbols (Kosher, Halal), if applicable
  - G. Recommended Storage Conditions
  - H. Country of Manufacture
  - I. Subcomponents Country of Manufacture
  - J. Date of manufacture and date of expiration of product

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- K. Product Lot number
- L. EST # (if applicable)
- M. Special claims (if applicable)

**k. Pallet Requirements**

- i. Supplier shall have a pallet management program that includes inspection for damage, infestation, mold, splinters, etc.
- ii. Grade A pallets should be used and if Supplier is not able to comply with this requirement, Supplier shall be required to provide alternate measures to ensure food safety of ingredients/finished products on the pallets for evaluation.
- iii. The use of slip sheets is required for finished product pallets.
- iv. Pallets imported to the United State shall be heat treated and be stamped with HT.

**l. Weight Control**

- i. Procedures shall be documented and implemented to assure that the stated weight, volume, or count claim on the package correctly states the contents in accordance with regulations and/or guidelines appropriate to the country or region of the intended sale of the product.
- ii. In no case shall packages which are outside of allowable regulatory or customer limits or guideline be shipped. Packages not meeting requirements shall be reworked or discarded.
- iii. All equipment used to check weights, volumes and/ or count shall be calibrated regularly.

**m. Hazard Analysis and Critical Control Point (HACCP) or Food Safety Plan (FSP)**

**i. Multi-disciplinary team is established to define and review the HACCP plan.**

- A. Documented HACCP program (designed to approved global recognized systems) implemented HACCP team is established to review the HACCP plan.
- B. HACCP team is represented by all key functions, this includes quality assurance, maintenance and operations and may include but is not limited to (e.g. engineering, sanitation, product development, and finance/purchasing, etc.)
- C. Product description and intended users is defined.
- D. Verified process flow chart established which accurately depicts process from point of material receiving through finished product shipping.
- E. HACCP system implemented for the identification, evaluation, and control of food safety hazards. The program shall be based on the seven principles:
  - Principle 1: Conduct a hazard analysis
  - Principle 2: Determine the critical control points (CCPs)
  - Principle 3: Establish critical limits
  - Principle 4: Establish monitoring procedures
  - Principle 5: Establish corrective actions
  - Principle 6: Establish verification procedures
  - Principle 7: Establish record keeping and documentation procedures
- F. All information needed to conduct the hazard analysis (Principle 1) are identified, documented, and reviewed; information shall include but is not limited to:
  - 1) Historical hazards associated with raw ingredients, processing, and food contact packaging.

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- 2) Understanding and documentation of relevant factors that influence bacterial growth, potential chemical, and physical hazards that are associated with the raw ingredients and specific processed food products.
  - 3) Identification of scientific approach used to determine critical limits and these limits are clearly understood and documented.
  - 4) Hazard analysis completed for each process stage on the process flow chart (including rework, allergens, foreign material, antibiotic, and other additives, if applicable).
- G. Critical Control Points are identified (Principle 2)
- 1) Identification of method used to determine critical control points (e.g. decision tree).
  - 2) CCP (s) are identified in the process flow chart.
  - 3) Evidence that control measure selected, and critical limits identified.
- H. (Principle 3) are capable of consistently controlling the hazard.
- 1) Critical limits are established and validated as necessary to mitigate risk.
- I. CCPs are monitored (Principle 4) according to documented procedure with appropriate action(s) taken and recorded (Principle 5) if CCP tolerances are exceeded. Requirements include:
- 1) CCPs shall be monitored with the frequencies and methods indicated in the HACCP program.
  - 2) Review of records, where acceptable limits have not been achieved, corrective actions for issues found are on file.
  - 3) Assess that corrective actions were effective (i.e. corrective actions address root cause).
- J. Verification procedures (Principle 6) and record keeping, and documentation procedures (Principle 7) are established.
- 1) Defined verification methods/procedures used to determine that the HACCP system complies, and critical limits are established and verified.
  - 2) Record keeping and documentation is sufficient to demonstrate the HACCP controls are established and effective.
  - 3) The HACCP plan (s) shall be developed and managed by qualified staff and shall include: (Records/Observation)
- K. Identification of persons responsible for conducting the internal HACCP review.
- L. The lead individual who is responsible for the maintenance and updating of the HACCP program has had formal HACCP (or PCQI) training.
- 1) Employees managing/monitoring CCPs are aware of CCPs and the critical limits in their area(s) and what action to take if the limit(s) are exceeded.
  - 2) HACCP team will have specific HACCP training (internal or third party is acceptable).
- M. A program is established to review existing HACCP plans and any changes that impact CJ-Schwan's Brands products are communicated to CJ-Schwan's Supplier FSQ Manager. Records and corrective actions are available and include:
- 1) Documented review of HACCP plans by the HACCP team annually including a revision history.
  - 2) Review of HACCP plans prior to any changes based on food safety risk assessment. Changes to HACCP programs that impact CJ-Schwan's brands products or conflict with existing specifications shall be approved by CJ-Schwan's Supplier FSQ Manager prior to implementation.

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N. Documented food allergen program that identifies allergens in raw materials and finished products and defines the control of the allergens is established. At a minimum, the following food allergens must be addressed: peanuts, soybeans, milk, eggs, fish, crustacean, tree nuts, wheat, and sesame. Additional allergens and sensitivities required by local requirements/regulations of both the country of manufacture and the country of destination must also be included. Control methods are effective and include the following:

- 1) Procedures are established to manage food allergens in the facility.
- 2) Risk assessment determined for all ingredients including an established allergen list.
- 3) Annual training on allergen handling practices and control, including spill management.
- 4) Where an allergen is present in the final product, there is verification that the allergen is listed on the ingredient label, including any allergens that are present in the facility and are a potential cross contact/cross-contamination risk.
- 5) Ingredient weighing/handling/storage practices and processing order or change over procedures specifically address ensuring allergens are not transferred to a non-allergen containing product/other allergen products.
- 6) Sanitation procedures and practices do not allow cross contact of allergens to non-allergen /other allergen products.
- 7) Cross contact of an allergen to a non-allergen product or ingredient and/or cross contact of an allergen to another allergen product or ingredient.

**n. Non -Conforming Product Control**

- i. Supplier shall have a documented program in place to prevent unintended use in production or the shipment of nonconforming CJ-Schwan’s product.
- ii. Non-conforming product control programs shall at minimum include the following aspects:
  - A. Facilities shall not accept, store, process, package, or ship product or packaging material that fails to meet CJ-Schwan’s specification requirements.
  - B. There shall be a protocol in place to transfer any product that is found to be out of compliance with the specification on a “Hold” status.
  - C. Documentation for release of non-conforming product shall include risk assessment, pictures, confirmation testing results, and written approval of release from CJ-Schwan’s Corporate FSQ.
  - D. Documentation for destruction of non-conforming product shall include pictures of the product in the destruction process and a formal list of product description, code date, reason for destruction, and volume (lbs, cases, etc.).
  - E. Facilities shall have a documented procedure for handling shelf-life extensions which includes risk assessment, shelf-life study, and approval by CJ-Schwan’s Corporate FSQ.

**o. Complaint Management**

- i. Supplier shall have a program in place to manage and trend consumer and customer complaints as well as respond with corrective actions at the request of CJ-Schwan’s.
- ii. Program shall at a minimum include:
  - A. All complaints shall be recorded for review, at CJ-Schwan’s request, including the details of investigation and corrective action(s).
  - B. Continuous improvement strategies shall be utilized with the goal to eliminate all product complaints.
  - C. Product-complaint elimination responsibility shall be assigned to a directly responsible individual or group at the production facility.

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- D. Foreign material (ex. Bone, Metal, Glass, or Hard Plastic), alleged illness, and other food safety related complaints (ex. Mislabeling, Potential product Adulteration or Tampering) are to be given urgent status. Efforts shall be made to provide a thorough investigation and communicate critical findings within 48 hours of the initial received report.
- E. Trending information for a customer complaint log is to be reviewed at a set frequency by appropriate members of the management team to drive improvement and evaluate the effectiveness of corrective actions.

**p. Traceability**

- i. The facility shall maintain a current documented product traceability and recall program through all stages of the process beginning with material receiving through product shipment. The company shall be able to complete this test within 4 hours.
- ii. The recall and traceability program minimum requirements shall include:
  - A. The facility shall have an established recall team. Recall team contact information shall be provided to CJ-Schwan's Corporate FSQ.
  - B. All finished products, ingredients, packaging components, and processing aids shall have unique identifying numbers that can be tracked from receiving through all stages of processing including customer shipments to ensure full traceability.
  - C. Production records shall include the following key information to ensure that traceability for each production run is easily identifiable:
    - 1) Finished product name and identification number.
    - 2) Ingredient, packaging, and processing aid identification number.
    - 3) Quantities of ingredients, packaging, and processing aids utilized.
    - 4) Date of production and use for all production components.
    - 5) Date of component receipt.
    - 6) Date and destination of finished product shipments.
  - D. Traceability shall be established at all stages of the manufacturing process including raw- material receiving, raw-material storage, in-process materials, post-production storage and shipping.
  - E. Traceability records shall be kept and maintained in such a manner that they are accessible in a timely fashion.
  - F. The recall program shall always be operable.
- iii. The program shall be tested, on a frequency no less than twice annually, for CJ-Schwan's product.
  - A. Required to cover finished product, packaging, and ingredients
  - B. Required to identify and capture 100% +/- 2% of product or materials affected within four (4) hours.
  - C. Results shall be reviewed by the food safety team and appropriate corrective actions applied for any failure to capture 100% +/- 2% of affected product or material within the four (4) hour window.
  - D. The facility shall meet regulatory requirements related to traceability and recall/withdrawal.

**q. Crisis Management**

- i. Suppliers shall have a documented crisis management plan, that includes a product recall/withdrawal procedure. The plan shall include the understanding of known potential dangers (e.g., flood, drought, fire, tsunami, or other severe weather or regional events such as warfare or civil unrest) that can impact the facility's ability to deliver safe food, be documented by senior management outlining the methods and

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responsibility the facility shall implement to cope with such a business crisis, current contact information and be tested at a minimum annually. CJ-Schwan's shall be contacted promptly in the event of a product recall/withdrawal or other crisis, which may affect CJ-Schwan's product.

- ii. The crisis management plan shall include at least the following:
  - A. Communication plan
  - B. Documented contingency plan
  - C. The nomination and training of a crisis management team iv. Implementation requirements involved in crisis management
  - D. Checklist of required activities including an assessment of impact to product/facility/equipment
  - E. The preparation and maintenance of a current crisis alert contact list, including supply chain customers
  - F. Root cause analysis and corrective actions post incident

**r. Date Coding**

- i. All date coding information shall be clear and legible.
- ii. Date coding information shall be accurately summarized on each CJ-Schwan's agreed upon specification.

**s. Material Handling Program**

- i. The facility shall have a written receiving, storage, and shipping program, to comply with CJ-Schwan's specification and requirements, to assure the food safety and quality of materials and CJ-Schwan's products.
- ii. The facility shall have established goods-receiving protocols to include, but not limited to:
  - A. A protocol shall be in place to outline requirements of incoming transport vehicles including cleanliness, trailer seal verification, trailer inspection, mixed load restrictions, and trailer-identification tracking.
  - B. A documented trailer seal program failure protocol shall be available to manage risk assessment of missing, mislabeled, or broken trailer seal on incoming transportation vehicles. All findings shall be documented.
  - C. Incoming transport vehicles shall be inspected for proper temperature requirements based on material specifications. Documentation of transport vehicle temperature tracking is required.
  - D. Conditions identified as not meeting established requirements shall result in notification to designated personnel for risk assessment and disposition decision.
- iii. Documented procedures shall be in place to assure that the storage of finished product ingredients, work in progress, or packaging materials is such to maintain food safety and quality.
- iv. Temperature controlled storage shall have a documented monitoring program assigned to ensure that acceptable conditions have been maintained for the duration of storage.
  - A. Where temperature control is required, documentation shall be provided showing the storage area meets product specifications for proper storage.
  - B. Storage outside of the facility, where materials may be exposed to the environment, shall not be acceptable.
  - C. Storage areas shall follow industry best practice GMPs. Product shall not be stored on the floor; there shall be an 18-inch border along the exterior of all storage areas; and the storage area itself shall provide protection from contamination.

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- D. Specific storage plans for sensitive ingredients shall be established to prevent cross-contamination.
  - 1) Examples of products with special ingredients include those containing allergens or items with
  - 2) special claims (e.g. organic, gluten free).
- E. A first expiry, first out (FEFO) inventory system is required for all stored materials. Any variance to the FEFO system shall be justified through risk assessment.
- F. Storage areas shall be maintained in a clean and sanitary manner with documented cleaning records.
- G. Storage materials shall not present foreign-object risks. Pallet and other storage-area infrastructure inspections are required.
- H. Materials that are damaged or otherwise inappropriate for use shall be clearly identified to prevent accidental usage and placed on “Hold” status until such time the material is returned to the supplier or destroyed.
- v. The following procedures shall be in place to ensure outgoing shipments meet hygienic expectations:
  - A. Each facility shall have a documented trailer inspection program with established verification checks and thresholds for acceptability.
  - B. An established mechanism to confirm correct product and quantity of shipments.
  - C. Documented processes to maintain quality standards for frozen or refrigerated product shall be in place. Included shall be a procedure for verification and documentation of temperature setting of the trailer or container based on product specifications. Temperature verification shall be documented prior to, during, and at the end of the loading process.
  - D. Loads shall be secured so they do not shift during the transportation process.
  - E. A trailer seal program that is compliant to CJ-Schwan’s requirements shall be utilized for the shipping of all CJ-Schwan’s products. Product shipped to CJ-Schwan’s shall have a seal or acceptable locking device on all trailer/vehicle openings, i.e. hatches, inspection doors, main doors, etc. The seal number shall match the number on the bill of lading (BOL). Less Than Truck Loads (LTLs) shall be locked.
  - F. Supplier or Supplier’s Carrier will be held liable for any load “rejected” due to non-compliance with CJ-Schwan’s trailer seal expectations.
  - G. Shipping materials shall not present foreign object risks. Pallet inspections are required.
- vi. International suppliers shall have and provide an FDA/USDA registration number to CJ-Schwan’s. The number shall be maintained and provided to CJ-Schwan’s on an annual basis. All international suppliers shall comply with the Foreign Supplier Verification Program (FSVP) requirements, as outlined in the FSMA, and make all necessary evidence of compliance available to CJ-Schwan’s.
- vii. CJ-Schwan’s requires products received from supplier to have a minimum remaining shelf life at time of receipt:
  - A. Suppliers: Product shall have 50% shelf life remaining.
- viii. CJ-Schwan’s conducts an inspection upon receipt of materials. CJ-Schwan’s maintains the right to reject/not accept product within 72 hours of receipt and supplier shall be notified if product is not accepted.
- ix. A Certificate of Analysis (CoA), when required, shall be provided to CJ-Schwan’s at time of receipt or prior to shipment, for each lot of products contained in the shipment. Each CoA shall include, at minimum:
  - A. Supplier’s Name
  - B. Manufacturing Facility Address

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- C. Product Name iv. Supplier Material Number
- D. Lot Code
- E. Manufacture Date
- F. Expiration Date
- G. CJ-Schwan's Material Number
- H. Analytical and Microbiological Tests
  - 1) Test Results
  - 2) Test Method
  - 3) Facility Quality Contact
- x. Where the potential pathogen risk is mitigated by the supplier, CoA's shall minimally include pathogen indicator results.

**t. Food Defense**

- i. All facilities are required to have an implemented food defense program and annual vulnerability assessment to meet all regulatory, state, and local requirements.
- ii. The food defense program is required to identify defense vulnerabilities within the facility of operation.
  - A. Strategies to mitigate the risk of the identified vulnerabilities is required as part of the food-defense program.
  - B. Biosecurity measures are required to be in place to meet CJ-Schwan's standards for shipping and receiving sealed trailers, less than full truck load deliveries, facility visitor, and third-party contractor work.
  - C. Verification auditing shall be conducted to ensure compliance to the facility food-defense program.
  - D. Training shall be conducted for new hires along with refresher training for existing employees based on a set frequency.
- iii. The Public Health Security and Bioterrorism Preparedness and Response Act of 2002 requires domestic and foreign facilities that manufacture, process, pack, or hold food for human or animal consumption in the United States to register with the FDA.
- iv. Supplier approval shall include risk assessment for the potential of product substitution and product fraud as part of the supplier approval process.

**u. Allergen Management**

- i. The facility shall have an established system for the management of allergenic materials which identifies and eliminates cross-contact risk or labeling inaccuracies.
- ii. Allergen information shall be provided on the CJ-Schwan's Allergen Questionnaire.
- iii. Acceptable allergen control programs shall include, but are not limited to, the following processes:
  - A. Change control of allergen content for either ingredients or finished product is integrated into the food safety plan and reviewed by the food safety team prior to changes taking place.
  - B. All new ingredients or products are to be reviewed by the food safety team for allergen risk prior to receiving new ingredients or making new products. Changes to allergen content within the facility shall be communicated to CJ-Schwan's prior to implementation.
  - C. The allergen program shall include labeling guidelines for incoming raw materials, work in progress materials (WIP), and finished goods. The program shall clearly identify points where raw

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materials and labeling shall be verified as correct for usage as well as finished product label verification for accurate allergen content.

- D. Cross-contact risk mitigation steps shall include scheduling of allergen materials for production, segregation of equipment, tools, employees, and all other areas of risk. Utilization of color coding or full allergen labeling is required.
- iv. All allergen control policies, procedure training, and validation/verification activities shall be reviewed at a set frequency by the food safety team or designee. Documentation of this review and any changes made is required.
  - A. Each facility, with applicable allergen risk, shall implement a sanitation validation process to ensure their cleaning program is effective for the removal of allergen materials from production equipment, areas, and tools. This validation shall be repeated when any process or sanitation changes are implemented.
  - B. An annual effectiveness verification of allergen cleaning is also required for all lines and areas that produce CJ-Schwan's. This verification shall at a minimum include:
    - 1) Sanitation standard operating procedure (SSOP) accuracy audits
    - 2) Full review of monitoring activity (visual inspection, swabs, etc.)
    - 3) Review of training material for adequacy
    - 4) Documentation of verification and food-safety team approval
  - C. All applicable employees shall receive allergen risk training followed by a knowledge check prior to working in an allergen risk area. Individuals shall refresh their training annually. All training shall be documented.
- v. The facility shall maintain a list of allergenic items or an allergen matrix.

**v. Employee Training**

- i. The facility shall ensure that all personnel performing work pertaining to food safety, legality and quality are competent to carry out their activity through training, work experience, or qualification.
- ii. Training program minimum requirement shall include:
  - A. All applicable staff including new hires, temporary staff, or third-party contractors shall be properly trained prior to performing unsupervised work tasks.
  - B. Personnel engaged in activities relating to critical control points or preventative controls shall go through a competency assessment prior to commencing work.
- iii. The facility shall maintain a training matrix which clearly defines the required training for employees and 3<sup>rd</sup> party groups.
- iv. Records of training shall be maintained, and training shall be completed by a qualified individual. Records shall be available for review and include date of training, individuals trained, name of trainer, knowledge verification and full training material.
- v. Failures to correctly execute trained upon tasks by personnel shall result in a retraining of the individual or group.

**w. Good Manufacturing Practices (GMP)**

Each approved facility shall have a written GMP policy for all of employees, visitors, and contractors handling product for CJ-Schwan's that shall comply with current Good Manufacturing Practices (cGMPs) established by laws, regulations, and internal requirements. Building, grounds, equipment and processes shall meet cGMP requirements. The policy shall be presented in the appropriate language for each individual, prior to entering the facility's production areas. The facility shall conduct a GMP Audit at minimum, once a month, and records shall be

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available for review. Staff facilities shall be sufficient to accommodate the required number of personnel. The facilities shall be maintained in good and sanitary condition.

***i. Personal Hygiene Practices***

- A. Suppliers shall maintain personal hygiene standard designed to minimize the risk of product contamination from personnel. The Codex Alimentarius Commissions recommendation on personal hygiene shall be followed.
- B. Health screenings shall be in place for new and existing employees and visitors, where permitted. Procedures in place for managing illnesses and communicable diseases shall be established and communicated throughout the company.
- C. Individuals infected with, exposed to or are a carrier of a communicable disease shall not be allowed to enter an area where finished product, raw materials, product packaging, or equipment would be at risk for contamination. Individuals with open sores or boils shall not be allowed to contact product or product contact surfaces without adequate protection. *A list of infectious disease symptoms and blood born pathogen risks shall be kept as part of the facility policy and trained up with appropriate staff.*
- D. Jewelry, including watches, necklaces, rings, items with decorative stones, or visible piercings, is prohibited from processing or storage areas. Plain wedding bands may be deemed acceptable at the discretion of facility management. Medical alert necklaces and wrist bands are acceptable with daily reconciliation practices.
- E. Gum, smokeless tobacco, candies, etc., shall not be allowed in processing or storage areas.
- F. False fingernails, false eyelashes, excessive perfume/cologne, nail polish, or other personal items that could create risks shall not be allowed. Fingernail length shall not exceed a length that poses risk of harborage.
- G. Decorative tooth jewelry requires a single elastic-banded, dust-type mask or beard restraint shall be worn.
- H. Consumption of personal food and drink are allowed only in designated areas and shall not be allowed in processing or storage areas.
- I. Personal medication shall be managed under an existing plant program to ensure the risk of product contamination is eliminated.
- J. Smoking is permitted only in designated areas away from production and storage areas.

***ii. Approved Clothing/Attire***

- A. For anyone in the facility, personal clothing shall be clean and free from foreign object risk.
- B. Company provided clothing shall be clean and in good repair with replacements readily available in the event of soiling or damage so that uniforms/covers do not become a potential source for contamination.
- C. Company-provided work wear shall be color-coded for designated risk levels such as floor cleaning, ready to eat area work, or pre-lethality step designation.
- D. Exterior clothing shall fashion with snaps or ties instead of buttons. Exterior clothing shall be free of tears or frays that could present foreign-object risk.
- E. Footwear shall be designed to minimize risk of contamination. Footwear shall be constructed of nonabsorbent material and have cleanable exterior surfaces. Footwear shall be kept in an acceptable level of cleanliness.
- F. A captive footwear program is required unless risk analysis indicates that additional mitigation steps are in place to fully manage cross-contamination risk.

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- G. Work wear designated for specific areas shall be kept in those areas per facility procedures and policies.
- H. No items shall be stored in pockets above the waist.
- I. No clothing adorned with ornaments (i.e. sequins, beads, charms, etc.) shall be worn into production or storage areas.
- J. Hair restraints (including beard nets) shall be required to be worn in processing and storage areas. Hair restraints shall effectively contain all hair present.
- K. Hair restraints that become stretched, worn, or damaged and do not effectively contain all hair shall be replaced immediately.
- L. Highly visible and metal-detectable bandages shall be utilized along with a documented detection verification program.

**iii. Hand Sanitization**

- A. The company shall provide sufficient hand washing facilities to comply with all federal, state, and local requirements as well as GFSI audit requirements.
- B. Hand washing facilities and signage shall be located where it is easy to monitor compliance with the local policy. Specifically, hand-washing facilities shall be located in all restrooms and within close proximity to all work areas that contain food, food contact surfaces, or exposed packaging material.
- C. Each hand wash facility shall be designated as “Hand Wash Only.”
- D. Hand washing facilities shall be constructed in such a way as to eliminate the possibility of re-contamination after washing and drying.
- E. Hand wash supply water shall be 100 degrees F within 15 seconds.
- F. Proper hand washing procedure training shall be provided to all employees and new hires. This training also shall be a part of the visitor/outside-contractor training program.
- G. Personnel working in microbiologically sensitive areas shall wear latex-free gloves. All gloved hands shall be washed at the same cleaning frequency that hands are required.
- H. Employee hands are required to be washed at the following times:
  - 1) Directly before exiting the bathroom.
  - 2) Upon entering the work area at the beginning of the shift.
  - 3) Prior to beginning work activity that involves direct food contact.
  - 4) When returning to the work area for any reason.
  - 5) Prior to putting gloves on.
  - 6) Upon touching any non-sanitary material or surface (floor, nose, hair, etc.).
  - 7) Any time the hands become soiled for any reason.
- I. Documentation of GMP training and knowledge verification with applicable groups shall be maintained.

**x. Sanitary Design - Facility and Grounds**

- i. Facilities shall be designed and constructed following set sanitary design principles to ensure the production of materials is completed without undue risk.
- ii. The facility shall be suitable in size and location and maintained in order to facilitate the production of safe and legal products.
- iii. The facility shall have reasonably designed systems in place to prevent unlawful or malicious actions from affecting the products and premises.

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- iv. Facility utilities are required to be adequate to prevent areas of possible contamination risks such as condensation or direct exposure to non-food grade materials.
- v. The facility layout, flow of processes and movement of personnel shall provide adequate physical separation to prevent cross-contamination risk of foreign objects, or microbiological contaminants and cross-contact risk of allergens.
- vi. The interior of the facility (floors, wall, drains, ceilings, lights, etc.) shall be of suitable condition and not present a hazard to the product.
- vii. Exterior facility grounds shall be maintained to prevent pest infestation or attraction.
- viii. Waste shall be adequately segregated and disposed of, in a manner, that prevents contamination of the product and the surrounding environment.
- ix. The facility shall have available a record of sanitary design standards for the company and records of completed sanitary design assessments for the facility.

**y. Sanitary Design - Equipment and Utensils**

- i. Equipment & utensils shall be designed to be effectively cleaned and does not create potential harborage.
- ii. Product contact and adjacent equipment shall be constructed of appropriate materials that shall not breakdown creating foreign object or microbiological harborage risks and remain a fully cleanable surface.
- iii. Equipment and utensils shall be suitable for the intended purpose and of hygienic design. They shall be properly maintained and cleaned to protect the product from contamination including allergen cross contact. Cleaned and sanitized equipment and utensils shall be stored in a manner that is protected from potential contamination and allergen cross contact.

**z. Maintenance Quality & Food Safety**

- i. The manufacturing facility shall have a fully integrated preventative maintenance program to deter food safety risks and ensure the production of consistently high-quality product. The program must include:
- ii. Preventative Maintenance (PM) programs shall exist to achieve consistent conformance to food safety, personal safety, and quality requirements.
  - A. A schedule of facility and equipment maintenance tasks shall exist and comply with federal, state, and local regulatory codes.
  - B. Training of personnel to perform the maintenance PM shall be completed and documented.
  - C. Documented training and knowledge check of maintenance personnel on sanitary standards and expectations is required.
  - D. Foreign object elimination inspection shall be included in the PM procedure.
  - E. Records of all PM work and corrective actions shall be kept for tracking purposes.
  - F. Programs shall be in place to ensure compliance to the PM program and be reviewed by appropriate management team members, on a set frequency.
- iii. Requirements shall be in place to ensure quality during repair work.
  - A. A system shall be established to notify all applicable individuals that a repair is taking place or has taken place during or after production hours. This also applies to new equipment, plant construction, or other activities that could potentially lead to contamination of product, ingredients, equipment or packaging.
  - B. Programs are required for tool segregation and/or a validated tool cleaning program to ensure that any risk of cross contamination is properly managed. Documented training on the tool-management program is required.
  - C. Equipment or replacement parts brought to a production area shall be visibly clean and free from soil or corrosion that could act as a harborage point for contaminants.

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- D. After completion of work tasks, all tools and parts shall be accounted for. The area shall also be designated for appropriate cleaning prior to release of the area for further production. The release process shall have a documented cleaning and inspection step to assure no aspect of the program is missed.
- E. Cleaning after all repair work shall be completed by trained individuals and follow set sanitation standard operating procedures to ensure the area or equipment is properly returned to a sanitary condition.

**aa. Calibration**

- i. A documented calibration program and schedule shall be in place for measuring equipment.
- ii. Equipment used to measure and monitor critical aspects of the production process shall be identified and managed through a calibration program. Equipment in the calibration program shall be compared against an applicable nationally or industry recognized standard at an appropriate frequency to demonstrate consistent accuracy.
- iii. All manufacturing testing equipment used for food safety and quality testing shall be calibrated against nationally or industry recognized standards at established frequencies.
- iv. Calibration testing shall be completed at levels common to the required in process testing.
- v. If the measuring or monitoring devices are found to be out of calibration, previous results shall be reviewed and verified for accuracy as part of a corrective action plan.
- vi. All calibration records and verification of equipment, including corrective actions, shall be maintained.
- vii. Calibration training shall be documented for those individuals designated to perform routine calibration verification activities.

**bb. Cleaning and Sanitation**

- i. The facility shall have a documented cleaning and validated sanitation program to ensure that all equipment, tools, and infrastructure are properly cleaned and do not pose risk of product contamination.
- ii. A master sanitation plan is required for all production processes, production areas, equipment, and support areas. The plan shall include the following:
- iii. Master Sanitation Schedules (MSS) shall encompass all required non-routine cleaning programs in the facility
- iv. SSOPs for proper completion of all MSS task are required
- v. Documentation of completion for all MSS tasks shall be in place to ensure program compliance
- vi. Sanitation Standard Operating Procedures (SSOP) include:
  - A. Personal Safety Requirements
  - B. Cleaning Task Description (i.e. Equipment Name or Cleaning Circuit)
  - C. Frequency of Cleaning
  - D. Cleaning and/or sanitizing chemicals and appropriate concentration in volumes or ppm
  - E. Cleaning Equipment to be Utilized
  - F. Detailed Descriptions of Each Individual Cleaning Step
  - G. Steps to assure contamination does not occur during the sanitation steps
  - H. Prescribed verification of cleaning effectiveness activities
- vii. Documented Employee Training
  - A. All employees involved in the sanitation process are fully trained and approved to perform the required cleaning procedures. Training of the employees shall be conducted prior to performing the cleaning tasks and repeated at a regular frequency with documentation.

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- viii. Cleaning and monitoring trends are reviewed by the food safety team or appropriate members of the management team at set intervals.
- ix. A fully developed environmental monitoring program (EMP) is required to serve as a verification tool of sanitation effectiveness.
- x. The facility shall perform pre-operation inspections, verify, and monitor cleaning and sanitation results, and implement corrective action plan for deficiencies. Pre-operational inspections:
  - A. Shall be performed by trained individuals and formal pre-operational inspection training records and knowledge verification shall be available for review
  - B. Corrective actions taken based on failed pre-operational inspections shall be documented for review
  - C. Repeat failures to meet acceptance criteria shall result in formal procedure review by the management team followed by validation of new or modified procedures. Three failures are the recommended threshold to activate review and validation processes
  - D. Acceptable forms of routine cleaning effectiveness verification include visual inspection and routine ATP or micro indicator testing
  - E. CIP and cleaning documentation review is to be conducted following each sanitation cycle. Reviews shall include, but are not limited to: CIP charts, chemical concentration checks, COP charts, cleaning checklist and preoperational inspection
- xi. Cleaning equipment shall be properly designed and suitable for the intended purpose. It shall be stored in a clean and hygienic manner to prevent contamination.
- xii. Cleaning procedure shall be validated and reviewed annually. The procedures shall be revalidated when changes occur.
- xiii. Sanitation good manufacturing practices are required throughout the production facility for all sanitation related activities.
  - A. The appropriate cleaning program shall be prescribed for each area of the production facility to ensure maximum effectiveness of cleaning and the prevention of contamination risks.
    - 1) Dry Cleaning
    - 2) Wet Cleaning
    - 3) CIP/COP
    - 4) Manual Teardown and Clean ii. Processing equipment is kept in sanitary condition without hollow bodies, dead ends, or areas inaccessible to reach for effective sanitation.
  - B. The facility has programs in place to ensure cleaning chemicals do not contaminate products through approved usage and adherence to prescribed chemical concentrations.
  - C. Chemicals are labeled appropriately and stored in acceptable containers.
  - D. Chemicals are stored in a locked and restricted access area, separate from processing rooms including non-food grade cleaning and lubricant compounds. Chemicals are not allowed on the production floor at time of product manufacture.
  - E. Chemical supplier documentation is available to confirm that the chemicals used for cleaning are appropriate for their current usage in the cleaning program and meet all local, state, and federal regulations.
  - F. Chemical usage personal protective equipment is properly stored to assure they do not become a potential source of contamination.
  - G. Follow proper procedures with cleaning tools to prevent them from being a potential source of contamination:

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- i. All tools shall be stored properly when not in use (e.g. not on the floor)
  - ii. Mops, squeegees, scrapers, or other tools shall not have wooden components
  - iii. Handles that are hollow and allow for liquid or debris entry shall not be used
  - iv. Color coding shall be used to segregate cleaning tools when facility zoning includes ready to eat (RTE) and non-ready to eat (NRTE)
- xiv. Clean-in-place (CIP) and clean-out-of-place (COP) systems are managed to ensure proper function and effectiveness.
  - 1) All CIP/COP functions shall have a written SSOP that outlines the proper processing steps required to successfully complete each cleaning cycle.
  - 2) All employees performing CIP/COP functions shall receive documented training on the established CIP/COP SSOPs. iii. Each CIP/COP function shall have set documented operating parameters that have limited access for modification.
  - 3) Any change to operation parameters of a CIP/COP system shall be approved by authorized individuals and the effectiveness of that change shall be verified and documented.
  - 4) Routine verification of CIP/COP systems shall be conducted on a regular frequency to assure optimal cleaning function.
  - 5) Regular CIP/COP component calibration programs shall be implemented to ensure proper operation of the systems (e.g. flow meters, level sensors, thermometers, etc.)

**cc. Chemical Control**

- i. All chemicals used at the facility shall be purchased, labeled, stored and used in compliance with all applicable laws, regulations, and internal facility requirements.
- ii. Each facility shall have a written chemical approval and management program.
- iii. Chemicals shall be stored appropriately to prevent contamination. Safety Data Sheets (“SDS”) shall be on file for all chemicals used at the facility.

**dd. Pest Management**

- i. Supplier will have a documented pest control program with service provided by an approved Pest Management Professional (PMP).
- ii. Pest control program shall include:
  - A. The company name and designated pest management professional
  - B. Company required licenses, certifications, insurance, and other permits as required by government agencies to perform services
  - C. Types of pests being monitored and/or controlled.
  - D. Minimum of monthly inspections, and more frequent as necessary depending on risk factors
  - E. The number and placement of traps shall be effective to control pests and mitigate risk of entry into facility.
  - F. Updated certification of pest control operators as per local regulation.
  - G. Updated contract on scope of service maintained.
  - H. All traps, bait station, glue boards and insect glue light traps, etc. shall be labelled with date of inspection, or this shall be indicated in the pest management system, as appropriate.
  - I. Schematic map is current and dated.
  - J. Pesticides in use must be documented and approved for use by the relevant authority.
  - K. Safety Data Sheets (SDS) and product labels are available for all chemicals used.
- iii. Service reports including logs are current and available for review, and include:

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- A. Date of service
- B. Application method used
- C. Chemicals, quantities, and concentration used
- D. Signs of pest activities
- E. Scheduled follow up based on pest activity, if necessary
- F. Corrective actions and recommendations are documented for frequency of activity or other issues noted on service reports or may be listed on a separate report
- G. Individual conducting service
- H. Evidence that reports are being reviewed by the facility
- iv. Trend analyses are on file for all types of pests being controlled/monitored
- v. Corrective actions are documented.
- vi. If pesticides are stored in the facility, they shall be secured in such a manner as not to contaminate product, packing materials or equipment
- vii. Pest control devices are effectively maintained.
- viii. No loose or granular rodenticide is approved for use. Bait stations (with poison bait) shall be used outside the facility.
- ix. Pest control devices are in such a manner as not to contaminate product, packaging materials or equipment (e.g. insect light traps that use an electric grate to electrify flying insects (Insectocutors) are not allowed in open product areas if they create a potential foreign material risk)

**ee. Environmental Monitoring**

- i. The facility shall have a risk based environmental monitoring program (EMP) in place to monitor and control pathogens and indicator organisms. CJ-Schwan's shall be allowed to review the environmental monitoring program prior to approval. A risk assessment demonstrating that full control is attained through other factors is required for any facility that does not employ an EMP.
- ii. The EMP shall identify and test for the presence of all pathogens that are appropriate for the facility environment and risk factors, i.e. *Salmonella spp.*, *Listeria spp.*, *E. coli*.
- iii. The environmental testing program shall feature multiple zones to fully address the risk of pathogen presence across all areas of the facility. Risk assessment of the process and facility shall dictate which zones are tested, how frequently testing is performed, and the number of sites sampled.
  - A. Zone 1 – Product contact surfaces or directly above/adjacent surfaces to product or product contact surfaces.
  - B. Zone 2 – Surfaces below equipment or surfaces below but somewhat adjacent to product or product contact surfaces.
  - C. Zone 3 – Floors, walls, or other surfaces that are not above or adjacent to product or product contact surfaces including drains or other floor fixtures.
  - D. Zone 4 – Non- production areas such as hallways, welfare areas, plant entrances, etc.
- iv. Facilities shall have a set frequency of testing established sites or areas based on the operational risk of the process and facility. Industry best practices also include rotations for time of day and days of the week for site sampling.
- v. The facility shall conduct a full investigation into root cause for all positive findings. Documented corrective action shall be applied to all positive findings along with verification testing to ensure that the corrective action was effective.
- vi. The log of positive test results, corrective actions, and verification of effectiveness testing results shall be reviewed by the appropriate members of the management team at a set frequency to identify trends and ensure the appropriate level of response is given to each finding.

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- vii. Repeat EMP testing failures require documented escalation of corrective action to appropriately address findings. Seek and destroy strategies shall be implemented to eliminate all risk of potential cross contamination.

**ff. Micro and Analytical Testing and Monitoring**

- i. The supplier will demonstrate compliance with CJ-Schwan’s micro requirements and other analytical testing critical to food safety including raw material, finished product and Environmental Pathogen Program
- ii. Supplier shall have a clearly communicated microbiological monitoring and testing policy that states the facilities intentions to meet obligations to produce safe and legal products. The micro policy shall be:
  - A. Available in languages appropriate to the staff.
  - B. Communicated to all appropriate staff.
- iii. Inbound raw materials and final product micro and analytical testing program requirements are documented and shall assure the following:
  - A. Inbound raw materials are tested based on risk assessment and applicable CJ-Schwan’s minimum requirements (e.g., QAP, specifications, antibiotic residue) at the specified frequency.
- iv. Hold and release program established (inbound raw materials and finished products)
- v. Finished product pathogen testing (where applicable) conforms to CJ-Schwan’s requirements for specific microbial targets and frequency of testing
- vi. Other finished product testing conforms to CJ-Schwan’s requirements, as outlined on the product specification.
- vii. Micro and analytical testing program is reviewed at minimum annually, or more often (e.g. based on risk assessment, customer complaints, new risk identified, etc.) by senior management.
- viii. Documented system for controlling of out of spec results for raw materials, in process product and finished product is established.
- ix. Products temperatures at receiving, storage and loading are monitored and documented and meet the required specifications, in accordance with the HACCP/Food Safety plan.
- x. Supplier shall have in place Environmental Pathogen Program essential to minimize the risk of contamination of Ready-to-Eat (RTE) products:
- xi. Environmental Pathogen Program shall be established, based on risk assessment, for RTE foods regarding microbial analysis specific to the plant environment and products being manufactured.
- xii. The Environmental Pathogen Program shall be compliant with applicable regulatory requirements, such as the USDA FSIS Listeria Control Program for RTE foods.
- xiii. The Environmental Pathogen Program shall include:
  - A. Sampling plan, identification of sample locations and tests frequency
  - B. Definition of target organisms
  - C. Corrective actions for positive results and trending
  - D. Escalation and communication protocol
- xiv. Revision protocol, minimum annually or sooner as needed (changes on processing conditions, equipment or process flow, product failures, consistently negative results).
- xv. Water micro and analytical testing program requirements are documented and shall assure the following:
- xvi. Water, ice, and steam (that come into contact with ingredients or finished product) shall be potable with adequate protection through filtration and backflow prevention.
- xvii. Water shall be tested at minimum annually (must be drawn from inside the plant from different points of use), supplier shall test for:
  - A. Aerobic Plate Count
  - B. Coliform
  - C. E. coli (not necessary if none detected on coliform count)
  - D. Nitrates/Nitrites (products affected by Nitrates/Nitrites, example:

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- E. required for poultry)
- F. Heavy metals: lead and mercury
- G. Off flavors and odors
- H. Note: Dry plants are required to test water (e.g. for hand washing purposes).
- xviii. Laboratories and testing methods are licensed/approved with documented training of lab personnel.
- xix. Laboratory testing must be in accordance with approved methods such as AOAC, FDA/BAM, or equivalent, unless otherwise approved by CJ-Schwan's Supplier Quality Manager.
- xx. Procedures and practices are established to prevent any cross contamination between laboratory and production facility.
- xxi. Laboratory and testing equipment is clean and well-maintained in accordance with good laboratory practices.
- xxii. No eating, drinking, or smoking allowed, and no food, beverages or personal items stored.
- xxiii. External testing for critical parameters used to release product shall be completed by an ISO 17025 accredited 3rd party laboratory
- xxiv. In house micro testing is conducted by appropriately trained individuals:
  - A. With ongoing verification (i.e. proficiency testing with positive and negative controls). Note: there are non- viable positive control options available
  - B. Trained by a qualified individual (e.g. a microbiologist or equivalent through experience)
- xxv. Records are on file and available which establish scientific basis for finished product shelf-life.
- xxvi. Any pathogen non-conforming micro for finished product for CJ-Schwan's Products are fully documented and communicated immediately to CJ-Schwan's with a documented hold policy and corrective action plan.
- xxvii. Program identifies all food safety critical equipment and defines equipment that must be calibrated and functioning for production.
- xxviii. Food safety critical equipment is calibrated and verified prior to placing back in production.
- xxix. Procedure for the disposition of affected product if calibration fails.
- xxx. Documenting methods and frequency of calibration and appropriate reference standards.

**gg. Good Laboratory Practices and Testing**

- i. Programs shall be in place to ensure reliability of laboratory results for testing done on product or material produced for CJ-Schwan's. CJ-Schwan's shall be allowed to review and approve testing completed on products and materials.
- ii. Unless agreed to in writing, suppliers shall not ship product with test results pending.
- iii. Controls shall be in place to prevent potential contamination of product by laboratory personnel or laboratory reagents.
- iv. Where the potential raw material pathogen risk is mitigated by the supplier, at minimum pathogen indicator test results shall be reported on the Certificate of Analysis (CoA) for each item lot shipment to CJ-Schwan's.

**hh. Waste Disposal**

- i. Each manufacturing facility waste disposal shall be managed in accordance with legal requirements and completed in a way that prevents risk of contamination or pest attractant.
- ii. Waste disposal control programs shall at a minimum include:
  - A. Where licensing is required for the disposal of waste, facilities shall utilize a licensed entity for waste removal and always maintain up-to-date licensing information on file at all times.
  - B. Facility waste receptacles and tools shall be clearly labeled, and color coded to ensure cross-contamination risks are appropriately managed.

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- C. Bulk waste containers shall be segregated within the layout of the facility to allow for handling that does not put other areas of the plant at risk of contamination.
- D. Facility traffic flows shall be maintained to limit potential exposure of product, materials, equipment, or personnel from waste collection or storage areas.
- E. Waste collection tools, receptacles, and bulk collection areas shall be cleaned at a set frequency to prevent the risk of microbiological growth. The cleaning cycles shall be documented.
- F. Waste collection areas and receptacles shall be properly protected to prevent pest attractant.

**ii. Water, Air, Ice and Gas**

- i. Water, air, ice, steam, and gas that come into direct contact with food product, food contact surfaces, or food packaging shall be safe and suitable for the intended use. They shall be monitored, and records shall show compliance with applicable law, regulations, and internal facility requirements.

**b. Plant Zoning**

- i. The facility shall have an established zoning plan to identify areas of elevated risk and prescribe appropriate controls to prevent cross contamination which shall be a part of the hazard analysis for the facility food-safety plan.
- ii. The zoning plan shall be utilized as part of traffic flow planning including employee, visitors, product, ingredient, packaging, and waste streams to minimize potential cross contamination risk to product.
- iii. Appropriate controls shall be in place at entry points to elevated risk areas from lower risk areas to mitigate risk of cross-contamination.

## **8. Animal Welfare & Social Responsibility**

- a. CJ-Schwan's expects all livestock producers, handlers, and processors to provide safe and humane treatment to the livestock within their care. The obligation to provide the proper levels of care and husbandry to livestock is a basic expectation and requirement we place on our business partners, as it is considered an ethical obligation. This commitment is aligned with fundamental values expressed in the internationally acknowledged Five Freedoms of Animal Welfare.
- b. Animal welfare & social responsibility programs shall at a minimum include:
  - i. Freedom from hunger and thirst by ready access to fresh water and a diet to maintain full health and vigor.
  - ii. Freedom from discomfort by providing an appropriate environment including shelter and a comfortable resting area.
  - iii. Freedom from pain, injury, and disease by prevention or rapid diagnosis and treatment.
  - iv. Freedom to express (most) normal behavior by providing sufficient space, proper facilities, and company of the animal's own kind.
  - v. Freedom from fear and distress by ensuring conditions and treatment which avoid mental suffering.
- c. CJ-Schwan's supports and is working with all partners to follow the fundamental nature of the 10 principles of Fair Trade as published by the WTO.
  - i. Creating opportunities for economically disadvantaged producers.
  - ii. Transparency and accountability.
  - iii. Fair trading practices.
  - iv. Payment of a fair price.
  - v. Ensuring no child labor and forced labor.
  - vi. Commitment to non-discrimination, gender-equity and women's economic empowerment, and freedom of association

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- vii. Ensuring good working conditions.
  - viii. Providing capacity building.
  - ix. Promoting fair trade.
  - ix. Respect for the environment.
- d. Applicable suppliers are expected to have a written policy addressing animal welfare and social responsibility commitment. The written policy shall be signed by the appropriate level of management and available for review upon request.

## 9. Packaging Supplier

All packaging materials supplied to CJ-Schwan's shall comply with all applicable laws, regulations, and Codes of Practices and Standards of the production country and the destination to which the materials will be delivered (both national and local requirements, as applicable).

### a. Packaging Manufacturing

- i. All food contact packaging materials shall be accompanied by a Letter of Guarantee (LOG) covering materials and conversion (e.g. inks, adhesives, coatings) and an FDA Letter of Compliance, whenever applicable, prior to the first material delivery.
- ii. Food Contact Packaging shall not be a source of biological (e.g. microbial), chemical or physical (e.g. foreign bodies) hazards. Suppliers shall demonstrate their ability to control food safety hazards to ensure that the packaged food is safe at the time of human consumption.
- iii. Packaging suppliers of materials with ingredient line information shall ensure that print runs items that are not mixed on a pallet.

### b. Printed Material Management: Destruction or Recycling of CJ-Schwan's Labeled Packaging Material

- i. The Supplier shall ensure that any discarded or recycled materials (including any scrap or waste) containing any CJ-Schwan's name, trademark or logo, or any other CJ-Schwan's identifying information, cannot be reused.
- ii. The supplier shall have a documented process for destruction and recycling of materials. When handled by a third-party company, responsibilities, and methods for assuring the destruction of the packaging material shall be specified in contracts including the verification of destruction.

### c. Transfer of Constituents from Food Contact Material

- i. Packaging materials that come in direct contact with the product, either by design or by foreseeable use, are defined by CJ-Schwan's Food Contact Packaging. Under their normal or foreseeable conditions of use, materials shall not transfer their constituents, or release any antimicrobial agents, to foodstuffs in quantities that could endanger human health, cause an unacceptable change in the composition of the foodstuffs (color), or result in deterioration of the organoleptic (tainting, odor) characteristics thereof. This requirement applies to all materials and articles intended to be in contact with food, either by physical contact, by head space exchange, or by insufficient barrier, under actual, intended, or foreseeable conditions. The requirement encompasses safety and consumer acceptance during both storage and after opening (i.e., during the preparation and consumption phase).
- ii. The packaging material shall be tested under conditions related to the food type, time, and temperature that the packaged food is exposed during filling, processing, storage, and preparation. The ingredients and composition of all packaging materials in a polymer shall comply with all legal safety requirements, in accordance

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**d. Transfer of Constituents from Plastic Materials**

- i. Where no dedicated national food packaging legislation for plastic material exists, CJ-Schwan’s requires compliance with Food and Drug Administration (FDA) (21 CFR 177), U.S. Department of Agriculture (USDA), U.S. Environmental Protection Agency (EPA) and state regulations. All corresponding raw data and documents shall be maintained and available.
- ii. For safety reasons, the residual monomer content in PVC shall not exceed 1 mg vinyl chloride per kg polymer. In addition, vinyl chloride shall not be detectable in food.

**e. Constituents from Paper and Board Materials**

- i. Paper and board for direct food contact shall be of suitable microbiological quality. In the absence of applicable regulations, the following guidelines shall be followed: FDA’s regulations in 21 CFR Part 176.
- ii. Films made of regenerated cellulose fibers shall be of food grade quality. In the absence of applicable regulations, the following references shall be followed: European regulation 2007/42/EC or U.S. 21 CFR Part 177.1200.

**f. Metal in Contact with Packaging**

- i. For primary packaging intended for use with dairy products, there shall be no direct contact between the packaging and copper or any alloy containing copper. Suppliers shall take steps to ensure that primary packaging does not contact these compounds either directly or indirectly through regular machine wear.

**g. Recycled Post-Consumer Material**

- i. CJ-Schwan’s favors the use of recycled materials provided that strict requirements are established to ensure food safety and that quality and performance are not compromised. CJ-Schwan’s does not permit post-consumer recycled materials used for primary packages to come in direct contact with food unless proper food safety parameters have been met. If compliance with food contact material regulations can be declared, CJ-Schwan’s shall make an exception for glass, metal, and specific product applications when agreed to by your CJ-Schwan’s Contracting Representative and included in CJ-Schwan’s Packaging Specifications.
- ii. Food contact packaging material suppliers (except for those exclusively supplying glass and/or metal) shall have a system in place to notify CJ-Schwan’s of any products or materials supplied to CJ-Schwan’s that contain post-consumer usage recycled material.
- iii. If post-consumer recycled material is part of a multi-component primary packaging system, but is not in the layer where it contacts the food, the use of the post-consumer recycled material shall only be permitted subject to three requirements:
  - G. CJ-Schwan’s shall be pre-notified;
  - H. The Food Additive/Migration status shall be ascertained with respect to the intended use; and
  - I. The material shall be identified as being recycled in the CJ-Schwan’s Packaging Specifications.

**h. Odor and Taste Transfer Testing**

- i. To fulfill legal requirements and to ensure consumer acceptance, food contact materials shall not change the organoleptic properties of the packed food. Food contact packaging materials supplied to CJ-Schwan’s shall comply with odor and taste transfer testing.

**i. Residual Solvents**

- i. Food contact packaging materials supplied to CJ-Schwan’s shall comply with residual solvents, if applicable.

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- ii. The total residual solvents in printed and converted materials shall be kept as low as possible. The solvent shall not exceed the legally acceptable limit according to ASTM F 1884-04 "Standard Test Method for Determining Residual Solvents in Packaging Materials.

**j. Printing Inks**

- i. Printing inks applied to the non-food contact side of a packaging shall not transfer any residues of toxicological concern. The inks shall be of high purity to ensure that there is no migration of substances that have not been toxicologically evaluated and that there is no violation of any specific migration limit imposed for other materials.
- ii. Aromatic compounds (e.g., toluene, xylene) shall not be part of the formulation added to packaging materials during the production, printing, or cleaning processes. However, traces below 0.5 mg/m<sup>2</sup> are considered 'aromatic' free.
- iii. In the U.S., suppliers shall have an FDA regulatory approval letter on file for approved use of specific inks used for indirect or direct product contact. For ink layers with direct food contact see the below.

**k. Printing in Direct Contact with Food**

- i. When packaging materials are printed on the side that shall be in direct contact with food and no functional barrier is in place, only food grade colorants can be used. Colorants shall be approved for food use in the locations where the products are produced and may be delivered. In the U.S., inks used for direct product contact shall be FDA approved food grade colorants.
- ii. This requirement applies to printings on the inner side of a package (e.g. for promotions). It also applies to outside printed packages that could be taken into the mouth or placed in close or direct contact to an unpacked food (e.g., multi component packs that comprise of packaged and unpacked food).

**l. Packaging Material Ingredients and Processing Aids Derived from Allergenic and Genetically Modified Sources**

- i. Materials derived from allergenic sources shall not be used (exception: oils derived from allergenic sources which have been refined, bleached, and deodorized are allowed). Allergenic sources are defined in the Food Allergen Labeling and Consumer Protection Act of 2004(FALCPA).
- ii. CJ-Schwan's shall be notified about the use of rubber-based natural latex used in adhesives or other indirect potential contact applications and about the use of any materials derived from Genetically Modified (GM) sources.

**m. Environmental Impact of Packaging**

- i. All materials supplied to CJ-Schwan's shall comply with national environmental packaging and packaging waste regulations of the production location and destination location(s) where products shall be produced, used, transported, and disposed. Suppliers shall consider source reduction and prevention, including an appropriate material delivery in terms of noise, urban congestion, transportation means, quantity and volume.

**n. Minimization of Heavy Metals**

- i. The supplier shall certify, via a Letter of Guarantee (LOG), for all packaging materials that heavy metals are not introduced into CJ-Schwan's packages or packaging components
- ii. The supplier shall certify that packaging materials supplied to CJ-Schwan's or used for any CJ-Schwan's labeled products do not contain more than a combined total of 100 ppm by weight of the following heavy metals from any source: lead, mercury, cadmium, and hexavalent chromium. The supplier shall conduct

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periodic monitoring of materials (including adhesives, labels, inks, dyes, and stabilizers) to assure compliance with this policy.

**o. Undesired Substances**

- i. CJ-Schwan’s trusts and relies on safety assessments of internationally recognized food safety authorities such as FDA, EFSA and others. At the same time, it also respects consumer preferences, therefore, CJ-Schwan’s shall be notified about any materials that contain ingredients of public attention in the food contact layer.
- ii. The use of Bisphenol A (BPA), phthalates, and intentionally added per- and polyfluoroalkyl substances (PFAS), in food packaging shall be avoided or if not possible, CJ-Schwan’s shall be notified.

**p. Packaging Information/Specification Sheets**

- i. For all packaging materials produced or shipped to the U.S. or Canada, Packaging Information and/or Specification Sheet shall be provided to CJ-Schwan’s. This shall occur prior to CJ-Schwan’s Packaging Specification development and purchase of material by CJ-Schwan’s.

**10. Continuous Improvement**

- a. Supplier shall have processes in place to improve the effectiveness of internal food safety and quality programs. Measurements shall be in place to demonstrate the results.