SQF Food Safety Audit Edition 9

El Paso Paper Box, Inc. - 54141

Summary

Audit Decision
Certified

Decision Date
May 12, 2026

Recertification Date
March 9, 2027

Expiration Date
May 23, 2027

Issue Date
May 12, 2026

Certificate Number
54141

Audit Type
Unannounced

On-Site Audit Dates
March 30, 2026 - March 31, 2026

ICT Dates
-

Audit Rating

Excellent

Facility and Scope

El Paso Paper Box, Inc. - 54141

24 ZANE GREY
El Paso, TX 79906 United States

Products
Folding Carton

Food Sector Categories
27. Manufacture of Food Packaging

Scope of Certification
The receiving of raw materials, die cutting, printing, glueing, palletizing, storage and distribution of folding cartons for food packaging.

Certification Body and Audit Team

Perry Johnson Registrars Food Safety, Inc

755 W Big Beaver Rd
Suite 1390
Troy, MI 48084 United States

CB#: 42246
Accreditation Body: ANAB
Accreditation Number: 1114

Lead Auditor: Wayne Williams (C-377121)
Technical Reviewer: Stephen-Jon Brown (C-421457)

Hours Spent on Site: 12
Hours of ICT Activities:
Hours Spent Writing Report: 4

Section Responses

Audit Statement - Audit

SQF Practitioner Name - Name the designated SQF Practitioner

Response: Jose Carlos Gallegos

SQF Practitioner Email - Email of the designated SQF Practitioner

Response: jgallegos@eppbinc.com

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

Response: W. Williams: Lead Auditor, P. Malooy: GM, A. Avina OE, J.C. Gallegos-QM, D. Quizez: CI Mgr, J.C. Herrara: Scheduling Mgr, R. Riveo: Accounting, B. Duarte: Plant.

Facility Description - Auditor Description of Facility (Please provide facility description include # of employees, size, production schedule, general layout, and any additional pertinent details

Response: Located in a business park, surrounded by various types of businesses, the facility is paved on 3 sides with the rear of the building abutting a rail spur, which is not in in use. The building is around 105,000 square feet, with parking lot and trailer loading/unloading on two sides of the building. 220 employees, which operates 3 shifts, 5 days a week 6:00 am-2:00 pm, 2:00pm-10:00 pm, 10:00 pm-6:00 am. Layout is such that machines are laid out by function (sheeters, printers, die cuts and finishing are located adjacent to each other, as opposed to an inline set up). The processes are managed in a way that minimizes potential cross contamination. The workforce is English and Spanish speaking.

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

Response: W. Williams: Lead Auditor, P. Malooy: GM, A. Avina OE, J.C. Gallegos-QM, D. Quizez: CI Mgr, J.C. Herrara: Scheduling Mgr, R. Riveo: Accounting, B. Duarte: Plant.

Auditor Recommendation - Auditor Recommendation

Response: Approve for recertification pending review and approval of nonconformances.

2.1.1 - Management Responsibility (Mandatory)

2.1.1.1 - Senior site management shall prepare and implement a policy statement that outlines at a minimum the commitment of all site management to: i. Supply safe food sector packaging; ii. Establish and maintain a food safety culture within the site; iii. Establish and continually improve the site's food safety management system; and iv. Comply with customer and regulatory requirements to supply safe food sector packaging. The policy statement shall be: v. Signed by the senior site manager and displayed in prominent positions; and vi. vi. Effectively communicated to all site personnel in language(s) understood by all site personnel.

Response: Compliant

2.1.1.2 - Senior site management shall lead and support a food safety culture within the site that ensures at a minimum: i. The establishment, documentation, and communication to all relevant staff of food safety objectives and performance measures; ii. Adequate resources are available to meet food safety objectives; iii. Food safety practices and all applicable requirements of the SQF System are adopted and maintained; iv. Staff are informed

and held accountable for their food safety and regulatory responsibilities; v. Staff are positively encouraged and required to notify management of actual or potential food safety issues; and vi. Staff are empowered to act to resolve food safety issues within their scope of work.

Response: Compliant

2.1.1.3 - The reporting structure shall identify and describe site personnel with specific responsibilities for tasks within the food safety management system and identify backup for absence of key personnel. Job descriptions for the key personnel shall be documented. Site management shall ensure departments and operations are appropriately staffed and organizationally aligned to meet food safety objectives.

Response: Compliant

2.1.1.4 - Senior site management shall designate a primary and substitute SQF practitioner for each site with responsibility and authority to: i. Oversee the development, implementation, review, and maintenance of the SQF System; ii. Take appropriate action to ensure the integrity of the SQF System; and iii. Communicate to relevant personnel all information essential to ensure the effective implementation and maintenance of the SQF System.

Response: Compliant

2.1.1.5 - The primary and substitute SQF practitioner shall: i. Be employed by the site; ii. Hold a position of responsibility in relation to the management of the site's SQF System; iii. Have completed a HACCP training course; iv. Be competent to implement and maintain HACCP-based food safety plans; and v. Have an understanding of the SQF Food Safety Code: Manufacture of Food Packaging and the requirements to implement and maintain an SQF System relevant to the site's scope of certification.

Response: Compliant

2.1.1.6 - Senior site management shall ensure the training needs of the site are resourced, implemented, and meet the requirements outlined in system elements 2.9 and that site personnel meet the required competencies to carry out those functions affecting the legality and safety of food sector packaging.

Response: Compliant

2.1.1.7 - Senior site management shall ensure the integrity and continued operation of the food safety system in the event of organizational or personnel changes within the company or associated facilities.

Response: Compliant

2.1.1.8 - Senior site management shall inform their certification body of any defined blackout periods that prevent unannounced re-certification audits from occurring when the site is not operating for legitimate business reasons. The list of blackout dates and their justification shall be submitted to the certification body a minimum of one (1) month before the sixty (60) day re-certification window for the agreed-upon unannounced audit.

Response: Compliant

Summary -

Response: There are no black out dates defined. The food safety policy is available 24-Mar-22 and is available in English and Spanish and is signed by Senior Management, the policy shows a commitment to produce complaint and food safe packaging. The policy is posted in strategic locations, including the employee bulletin board adjacent to the break room. The food safety team uses a practitioner and a backup practitioner to ensure continuity of the FSMS when personnel are changed. J. Gallagos is the SQF Practitioner, is a full time employee has a position of authority, and is HACCP certified (HACCP Cert. by AIB 30-Mar-24), J. Herrera is the back practitioner, is a full time employee, holds a position of authority and has a HACCP cert-Training Org

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dated 22-May-22. H .The organizational chart was available and dated 23-Jan-26. Reviewed job descriptions for Quality Manager-12-Jul-22, Quality Engineer-12-Jul-22 and Die Maker darted 12-Jul-17. The food safety culture process is in place and includes employee training and retraining, there is also a weekly review GMP compliance audits, and a yearly employee survey which includes understanding of SQF principles. The facility shows management commitment via Leadership participation in management reviews, monitoring of and posting of the Performance Metrics which include food safety elements and the requirement that all facility staff participate in Alchemy (food safety) training.

2.1.2 - Management Review (Mandatory)

2.1.2.1 - The SQF System shall be reviewed by senior site management at least annually and include: i. Changes to food safety management system documentation (policies, procedures, specifications, food safety plan); ii. Food safety culture performance; iii. Food safety objectives and performance measures; iv. Corrective and preventative actions, and trends in findings, from internal and external audits, customer complaints, and verification and validation activities; v. Hazard and risk management system; and vi. Follow-up action items from previous management review. Records of all management reviews and updates shall be maintained.

Response: Compliant

2.1.2.2 - The SQF practitioner(s) shall update senior site management on at least a monthly basis on matters impacting the implementation and maintenance of the SQF System. The updates and management responses shall be documented.

Response: Compliant

Summary -

Response: Management review is conducted yearly. The last management review was conducted on 13-Mar-26 and reviewed all requirements including corrective actions, customer complaints, food safety objectives and results, internal audits. Monthly reviews are performed and are recorded on the Minute Meeting report, Rev K. Reviewed monthly managers meeting notes 29-Mar-26, through 30-May-25, noted that customer concerns, status of the FSMS, management input was noted to be included in the notes.

2.1.3 - Complaint Management (Mandatory)

2.1.3.1 - The methods and responsibility for handling, investigating, and resolving food safety complaints from commercial customers, consumers, and authorities, arising from products manufactured or handled on-site or co-manufactured, shall be documented and implemented.

Response: Compliant

2.1.3.2 - Adverse trends of customer complaint data shall be investigated and analyzed and the root cause established by personnel knowledgeable about the incidents.

Response: Compliant

2.1.3.3 - Corrective and preventative action shall be implemented based on the seriousness of the incident and the root cause analysis as outlined in 2.5.3. Records of customer complaints, their investigation, and resolution shall be maintained.

Response: Compliant

Summary -

Response: Customer complaints are managed in accordance with procedure P 10.0, dated 03-Jun-25. A log is maintained for customer complaints. There have been 136 complaints from customers in 2025 and 24 YTD in 2026. There were noted to be no issues that could impact food safety. Reviewed 260102-Incorrect label- CA was issued against the complaint. The CA included the problem statement, root cause, correction and corrective action taken, 260101-Printing Issues-CA was issued against the complaint. The CA included the problem statement, root cause, correction and corrective action taken.251201-Wrong raw material-A was issued against the complaint. The CA included the problem statement, root cause, correction and corrective action taken.

2.2.1 - Food Safety Management System (Mandatory)

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

Response: Compliant

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

Response: Compliant

Summary -

Response: The documented FSMS/QMS is managed via a dashboard, the documented system included the food safety policy and the scope of the FSMS. The system in use only allows read access to the latest version of the FSMS documents. The GMPs are documented in the Employee Handbooks, dated 23-Feb-26. The GMPs are listed in section I, and also in the company NDA, dated 14-Feb-25.

2.2.2 - Document Control (Mandatory)

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

Response: Compliant

Summary -

Response: Document control is defined in procedure P 7.0, 01-Nov-21. Document control is defined in procedure P 7.0, 01-Nov-21. When new documents are created or changed, process owners must complete the F.7.5.2.1 QMS Revision Change Cover, dated 14-Sep-21. Reviewed change W6.1.1-Emergency Contingency Plan, the document was changed from Revision B to Revision C, dated 09-Feb-26, and was signed by the GM, the PM

and the QM.

2.2.3 - Records (Mandatory)

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

Response: Compliant

2.2.3.2 - All records that demonstrate inspections, analyses, and other essential activities have been completed shall be legible, accurate, and reviewed for correctness and completion.

Response: Compliant

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

Response: Compliant

Summary -

Response: Record Control is defined in procedure P 7.0, 01-Nov-21 and the varying retention period is covered on D 7.5.3.1/2.2.1 Documented Information Master List, dated 09-Feb-26. Generally records are retained 1 year.

2.3.1 - Product Formulation and Realization

2.3.1.1 - The methods and responsibility for the design and development of finished products from concept to commercial realization shall be documented and implemented.

Response: Compliant

2.3.1.2 - Changes to raw material, design, process, and equipment to produce the finished product shall be validated by site trials and product testing as required to ensure product safety (refer to 2.3.1.5).

Response: Compliant

2.3.1.3 - Where applicable, finished products designed with a functional effect for food safety reasons (i.e., prevent ingress of pathogens) shall have specified criteria and be referenced in the food safety plan (refer to 2.4.3).

Response: Compliant

2.3.1.4 - Trials where necessary shall be conducted to establish and validate a product's: i. Handling and storage requirements; and ii. Customer specification including the intended use of the product.

Response: Compliant

2.3.1.5 - The site's food safety plan shall be validated and verified for each new finished product, its associated production and distribution processes, or where a change to raw material, design, manufacturing process or equipment may impact food safety.

Response: Compliant

2.3.1.6 - Where applicable, the site shall have a procedure for confirmation and approval of customer artwork for the finished product. The controls shall also describe how print run samples are approved by customers and

changes to artwork are managed.

Response: Compliant

2.3.1.7 - The process flows for all new and existing manufacturing processes shall be designed to ensure that product is manufactured to approved product specifications to prevent cross-contamination and organized so there is a continuous flow of product through the process.

Response: Compliant

2.3.1.8 - Records of product design, specifications, process flows, shelf life trials (as required), and approvals for all new and existing products shall be maintained.

Response: Compliant

Summary -

Response: Specifications and process development are defined in procedure P 7.0, dated 01-Nov-21, the responsibility is given to the processing team. Design and development activities are recorded on the New Item Meeting Release form F.8.2.1.1, dated 12-May-20.Reviewed completed documents for O&M Holyard, noted that consideration was given to the printing artwork, the die dimensions, the PMS colors, the gluing, plastic bag, case pack quantity.

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

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

Response: Compliant

2.3.2.2 - Specifications shall be documented and kept current for raw materials, additives, processing aids, and auxiliary packaging materials (those used in direct contact with finished products) for containment or unitization.

Response: Compliant

2.3.2.3 - Finished product labels shall be accurate, comply with the relevant legislation, and be approved by qualified company personnel. Printed materials applied to or printed directly on finished product shall be accurate, legible, and comply with customer and regulatory requirements, including information regarding ingredients, allergens, identification codes, and other requirements. They shall be approved by designated company personnel and controlled to ensure relevance and accuracy.

Response: Compliant

2.3.2.4 - All raw materials including those made with recycled material, plant-based material, or additional additives shall be suitable for the intended use, food contact compliant where applicable, and shall comply with the relevant legislation in the country of manufacture and country of destination, if known.

Response: Compliant

2.3.2.5 - Site management shall require raw materials suppliers to notify of changes in product composition where they could have an impact on finished product, design, processing, or food safety.

Response: Compliant

2.3.2.6 - Raw and auxiliary packaging materials shall be verified to ensure food safety is not compromised and the material is fit for its intended purpose. Verification of raw and packaging materials' conformance to food safety

specifications shall include a letter of guarantee and a certificate of conformance, certificate of analysis, inspection, sampling, or testing.

Response: Compliant

2.3.2.7 - Description of services for contract service providers that have an impact on food safety shall be documented, current, and include relevant training requirements, where applicable, for all contract personnel.

Response: Compliant

2.3.2.8 - Finished product specifications shall be documented, current, approved by the site and their customer, if applicable, accessible to relevant staff, and may include: i. Physical and chemical characteristics; ii. Microbiological characteristics, where applicable; iii. Artwork and unitizing requirements; iv. Confirmation that the food sector packaging is suitable for the intended use by the customer; and v. Lists of raw materials, allergens, ingredients, identification codes, etc. Specifications for direct food contact packaging shall list the functional characteristics to protect the food product (shelf life extension, barrier properties, etc.).

Response: Compliant

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

Response: Compliant

2.3.2.10 - Where applicable, procedures shall also be in place for managing and verifying the specifications for correct printing plates, anilox rollers, and cylinders used during printing.

Response: Compliant

Summary -

Response: Specifications and process development are defined in procedure P 7.0, dated 01-Nov-21, typically the customer specifies the required fiber requirements. Raw materials requirements are maintained on the Raw Materials Register contained with the Carton ERP system. Reviewed raw material O&M Holyard, included the fiber type, the caliper of .016. The specifications includes roll size, caliper and board type, as well as the requirements for C of C. The Carton ERP system can build pivot tables for the Raw Materials Register. Finished goods specifications are stored in the Carton ERP system and include information such as O&M Holyard, noted that consideration was given to the printing artwork, the die dimensions, the PMS colors, the gluing, plastic bag, case pack quantity. Contract service provider information is maintained on the F8.4.1.1, dated 05-Jan-26, noted that Waves Pest Control and KBA North America-Maintenance and IWCS Calibration were approved suppliers.

2.3.3 - Contract Manufacturers

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

Response: N/A

Evidence: • NA: There are no contract manufacturers used at the site.

2.3.3.2 - The site shall establish a method to determine the food safety risk level of contract manufactured product and shall document the risk. The site shall: i. Verify compliance with the SQF Food Safety Code: Manufacture of Food Packaging and that all customer requirements are being met at all times. ii. Ensure changes to contractual

agreements are approved by both parties and communicated to relevant personnel.

Response: N/A

Evidence: • NA: There are no contract manufacturers used at the site.

2.3.3.3 - Records of verified compliance, contracts, and changes and approvals to contractual agreements for contract manufacturers shall be maintained.

Response: N/A

Evidence: • NA: There are no contract manufacturers used at the site.

Summary -

Response: NA: There are no contract manufacturers used at the site.

2.3.4 - Approved Supplier Program (Mandatory)

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

Response: Compliant

2.3.4.2 - The approved supplier program shall be based on the prior performance of a supplier and the risk level of the raw and packaging materials and services supplied. The program shall contain at a minimum: i. Agreed specifications (refer to 2.3.2); ii. Reference to the risk rating of the supplier, materials, or services supplied; iii. An assessment of the supplier's food safety risks and or controls to ensure that supplied materials does not pose a risk to food safety; iv. Methods for granting approved supplier status; v. Methods and frequency of monitoring approved suppliers; vi. Details of the certificates of analysis or conformance if required; and vii. Methods and frequency of reviewing approved supplier performance and status.

Response: Compliant

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

Response: Compliant

2.3.4.4 - Raw materials and services that impact finished product food safety shall meet the agreed specification (refer to 2.3.2.2) and be supplied by an approved supplier. The receipt of raw materials, processing aids, and packaging from non-approved suppliers shall be acceptable only in an emergency situation and provided a receiving inspection or analysis is conducted and recorded before use.

Response: Compliant

2.3.4.5 - Raw materials, auxiliary packaging, and finished product received from other sites under the same corporate ownership shall be subject to the same specification requirements (refer to 2.3.2), approved supplier requirements, and incoming inspections as all other material providers.

Response: Compliant

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

Response: Compliant

Summary -

Response: Supplier management is defined in P 8.0, dated 03-Jul-25. When approving suppliers, consideration is given to quality, on time delivery and price. Reviewed supplier approvals for suppliers Greenpaper-Supplier questionnaire on file-dated 18-Oct-23, Clampitt Paper-Supplier Questionaire on file-27-Oct-25 and Clearwater Paper-15-Nov-18. Raw materials are generally purchased to supplier identified specifications that are agreed upon by both the supplier and El Paso Paper Box. Reviewed paper specification CarrierPro board- the specification for fiber includes roll size, caliper and board type, as well as the requirements for C of C.

2.4.1 - Food Legislation (Mandatory)

2.4.1.1 - The site shall ensure that, at the time of delivery to customers, finished products shall comply with food safety legislation applicable to the country of manufacture and sale. This includes compliance with legislative requirements applicable to food safety, packaging, product descriptions, any other criteria listed under food legislation, and to relevant established industry codes of practice.

Response: Compliant

2.4.1.2 - The methods and responsibility for ensuring the site is kept informed of changes to relevant legislation, scientific and technical developments, emerging food safety issues, and relevant industry codes of practice shall be documented and implemented.

Response: Compliant

2.4.1.3 - SQFI and the certification body shall be notified in writing within twenty-four (24) hours in the event of a regulatory warning. Notification to SQFI shall be by email to foodsafetycrisis@sqfi.com.

Response: Compliant

Summary -

Response: The SQF Practitioner is responsible for informing staff of changes to requirements, this is accomplished via review of industry publications. In cases of a recall or other food safety packaging issue, the SQF Practitioner will notify SQFI and the CB of the situation within 24 hours, as defined in the Recall Procedure.

2.4.2 - Good Manufacturing Practices (Mandatory)

2.4.2.1 - The site shall ensure the applicable Good Manufacturing Practices described in Module 13 of this Food Safety Code are applied or exempted according to a written risk analysis outlining the justification for exemption or evidence of the effectiveness of alternative control measures to ensure that food safety is not compromised.

Response: Compliant

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

Response: Compliant

Summary -

Response: The facilities GMPs are defined in D 6.1.1 NDA and GMP, date 23-Jan-26, PRPs are defined in various SOPs that address specific requirements and programs. All requirements are adequately addressed, there were noted to be no exclusions in the scope.

2.4.3 - Food Safety Plan (Mandatory)

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

Response: Compliant

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

Response: Compliant

2.4.3.3 - The scope of each food safety plan shall be developed and documented including the start and endpoint of the processes under consideration and all relevant inputs and outputs.

Response: Compliant

2.4.3.4 - Product descriptions shall be developed and documented for all food sector packaging included in the scope of the food safety plans. This shall reference the finished product specifications (refer to 2.3.2.8) plus any additional information relevant to product safety such as water vapor transmission rate and gas permeability and the intended and potential alternative uses of each. This shall include requirements for further processing, if applicable.

Response: Compliant

2.4.3.5 - The food safety team shall develop and document a flow diagram covering the scope of each food safety plan. The flow diagram shall include every step in the process, all raw material, packaging material, service inputs (e.g., water, steam, gasses as appropriate), scheduled process delays, and all process outputs including waste and rework. Each flow diagram shall be confirmed by the food safety team to cover all stages and hours of operation.

Response: Compliant

2.4.3.6 - The food safety team shall identify and document all food safety hazards that can reasonably be expected to occur at each step in the processes, including raw materials and other inputs.

Response: Compliant

2.4.3.7 - The food safety team shall conduct a hazard analysis for every identified hazard to identify which hazards are significant, i.e., their elimination or reduction to an acceptable level is necessary to ensure food safety. The methodology for determining hazard significance shall be documented and used consistently to assess all potential hazards.

Response: Compliant

2.4.3.8 - The food safety team shall determine and document the control measures that must be applied to all significant hazards. More than one control measure may be required to control an identified hazard, and more than one significant hazard may be controlled by a specific control measure.

Response: Compliant

2.4.3.9 - Based on the results of the hazard analysis (refer to 2.4.3.7), the food safety team shall identify the steps in

the process where control must be applied to eliminate a significant hazard or reduce it to an acceptable level (i.e., a critical control point, or CCP). In instances where a significant hazard has been identified at a step in the process, but no control measure exists, the food safety team shall modify the process to include an appropriate control measure.

Response: Compliant

2.4.3.10 - For each identified CCP, the food safety team shall identify and document the limits that separate safe from unsafe product (critical limits). The food safety team shall validate the critical limits to ensure the designated level of control of the identified food safety hazard(s), and that all critical limits and control measures individually or in combination effectively provide the level of control required (refer to 2.5.1.1).

Response: Compliant

2.4.3.11 - The food safety team shall develop and document procedures to monitor CCPs to ensure they remain within the established limits (refer to 2.4.3.11). Monitoring procedures shall identify the personnel assigned to conduct monitoring, the sampling and test methods, and the test frequency.

Response: Compliant

2.4.3.12 - The food safety team shall develop and document deviation procedures that identify the disposition of affected food sector packaging material when monitoring indicates a loss of control at a CCP. The procedures shall also prescribe actions to correct the process step to prevent recurrence of the food safety failure.

Response: Compliant

2.4.3.13 - The documented and approved food safety plan(s) shall be implemented in full. The effective implementation shall be monitored by the food safety team, and a full review of the documented and implemented plans shall be conducted at least annually or when changes to the process, equipment, inputs, or other changes affecting product safety occur.

Response: Compliant

2.4.3.14 - Procedures shall be in place to verify that critical control points are effectively monitored and appropriate corrective actions are applied. Implemented food safety plans shall be verified as part of SQF System verification (refer to 2.5).

Response: Compliant

2.4.3.15 - Critical control point monitoring, corrective action, and verification records shall be maintained and appropriately used.

Response: Compliant

2.4.3.16 - Where food safety regulations in the country of production and destination (if known) prescribe a food safety control methodology other than the Codex Alimentarius Commission HACCP guidelines, the food safety team shall implement food safety plans that meet both Codex and food regulatory requirements.

Response: Compliant

Summary -

Response: The food safety team is a cross functional team consisting of members from Quality, Processing, Purchasing and Management. The team used the 12 steps of Codex to develop the HACCP plan, which consists of the product profile, flow chart and hazard analysis, the HACCP plan is dated 09-Feb-26. The plan was last validated on 09-Feb-26 and last verified on 09-Feb-26. Consideration has been given to each risk that could

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reasonably be expected to occur. The HACCP flow chart was signed by the HACCP Coordinator. There were noted to be no CCPs.

2.4.4 - Product Sampling, Inspection, and Analysis

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

Response: Compliant

2.4.4.2 - Product analyses shall be conducted to nationally recognized methods, company requirements, or alternative methods that are validated as equivalent to the nationally recognized methods. Where internal laboratories are used to conduct input, environmental, or product analysis, sampling and testing methods shall be in accordance with the applicable requirements of ISO/IEC 17025, including annual proficiency testing for staff conducting analyses. External laboratories shall be accredited to ISO/IEC 17025 or equivalent international standard and included on the site's contract service specifications list (refer to 2.3.2.7).

Response: Compliant

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

Response: Compliant

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

Response: Compliant

2.4.4.5 - Raw materials and finished product obtained for sampling and/or inspection shall be properly destroyed to prevent re-entry into the production process or sale to the customer.

Response: Compliant

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

Response: Compliant

Summary -

Response: Sampling is performed as defined in W 8.5.1, dated 03-Jul-25, the Quality team is responsible for completing the required sampling inspections. The facility uses incoming inspections for raw materials, first piece inspections for in-process work and final inspection for completed work. First piece inspection is recorded onto form F 9.2.2.2, final inspection is also recorded on F 9.2.2.2. Reviewed inspection records: 50922-Sheeter: Operational inspection, Roll ID, size, caliper, grain, coating (if applicable), grain direction, visual defects, such as alligator board Printing: Operational inspection, artwork correction, bar code legible, coated/uncoated, PMS color, grain, board size, operator sign and ink stains, Die Cut: Pre Operational inspection, Broken scores, zipper, carton size, angles Window: Pre Operational Inspection, P/N, correct

location, center cut, Finish: Preoperational inspection, glue, gage, glue inside carton, mixed and UPC code. 50673: Sheeter: Operational inspection, Roll ID, size, caliper, grain, coating (if applicable), grain direction, visual defects, such as alligator board Printing: Operational inspection, artwork correction, bar code legible, coated/uncoated, PMS color, grain, board size, operator sign and ink stains, Die Cut: Pre Operational inspection, Broken scores, zipper, carton size, angles Window: Pre Operational Inspection, P/N, correct location, center cut, Finish: Preoperational inspection, glue, gage, glue inside carton, mixed and UPC code.

2.4.5 - Non-conforming Materials and Product

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

Response: Compliant

2.4.5.2 - Finished product returned from a customer shall be quarantined until authorized for release for use or re-shipment.

Response: Compliant

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

Response: Compliant

Summary -

Response: Nonconforming materials are managed in according with P 8.0, dated 03-Jul-25. Nonconforming materials are entered into the nonconforming materials log. Reviewed Ticket 30367-Issue was machine damage, disposition was sort dispositioned by QA and Mfg, sorting is undertaken under the authority of QA, products are released by QA post sorting. 25-Mar-26-Missing feature due to die cut, disposition-rework, approved by cutting supervisor and QA. 25-Mar-26-Scratch had small scratch-Approved use as is-Quality Manager. 10-Nov-25-Lines in artwork, approved by QA, sorted scrap and acceptable material noted.

2.4.6 - Product Rework

2.4.6.1 - The responsibility and methods outlining how raw materials or food sector packaging product are reworked and recouped shall be documented and implemented. Rework shall be processed in a manner that does not contaminate raw materials or food sector packaging. The methods applied shall ensure: i. Reworking and recouping operations are supervised by qualified personnel; ii. Reworked and recouped product is clearly identified and traceable; iii. Each lot of reworked or recouped product is inspected or analyzed as required before release; iv. Inspections and analyses shall conform to the requirements outlined in element 2.4.4.1; v. Release of reworked and recouped product shall conform to element 2.4.7; and vi. Records of all reworking operations shall be maintained.

Response: Compliant

2.4.6.2 - Food sector packaging that contains printed information shall be handled in a manner that prevents mixed or intermingled product.

Response: Compliant

Summary -

Response: Nonconforming materials are managed in according with P 8.0, dated 03-Jul-25. Nonconforming materials are entered into the nonconforming materials log. Nonconforming materials are entered into the nonconforming materials log. 49331-Warped Sleeves-Rework, reinspected, prior to shipment.

2.4.7 - Product Release (Mandatory)

2.4.7.1 - The responsibility and methods for releasing finished product shall be documented and implemented. Methods shall ensure product is released by designated personnel only after disposition activities show that product is acceptable for release and to verify legislative and food safety compliance have been met.

Response: Compliant

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

Response: Compliant

Summary -

Response: Sampling is performed as defined in W 8.5.1, dated 03-Jul-25, the Quality team is responsible for completing the required product release. Final release is semi automated, as the products are not approved in the system until all of the process and inspection steps are completed. Reviewed inspection records 509722: inspection verified that the FG was produced using the correct materials to the BOM requirements, and that the requirements were achieved in each processing step (sheeting, printing, window, finishing), a checklist that defines the requirements to verify are recorded into the Carton ERP program, one of the requirements for each line is line clearance.

2.4.8 - Environmental Monitoring

2.4.8.1 - A risk assessment for all processes shall be conducted against known or expected concerns to identify if an environmental monitoring program is necessary. If the program is required, all requirements of environmental monitoring shall be applied (2.4.8.2, 2.4.8.3, 2.4.8.4).

Response: Compliant

2.4.8.2 - The responsibility and methods for the environmental monitoring program shall be documented and implemented.

Response: Compliant

2.4.8.3 - An environmental sampling and testing schedule shall be prepared, detailing any applicable pathogens or indicator organisms to test for that industry (i.e., Bacillus spp. in paper or paper products), the number of samples to be taken, and the frequency of sampling.

Response: Compliant

2.4.8.4 - Environmental testing results shall be monitored and corrective actions (refer to 2.5.3.1) implemented where unsatisfactory trends are observed.

Response: Compliant

Summary -

Response: Environmental monitoring is defined in P 9.0, dated 21-Aug-20, the Quality Manager is responsible for managing and monitoring the environmental program. D 9.2.1 ISO-9001/SQF Calendar dated 04-Feb-26 is used to define the risk and schedule for performing environmental monitoring schedule. The schedule requires that a environmental sample from each machine be taken on a rotating basis and tested using Hygiena Swabs for protein and compressed air testing. Reviewed protein swab results dated 27-May-25-Handwashing-Pass, 27-Jun-25-Office-Pass, 23-Jul-25-Sheeter-Pass, 22-Aug-25-Printing-Pass, 26-Sep-25-Cutting-Pass, 25-Oct-25-Air Quality-Pass, 25-Nov-25-Handwashing-Pass, 29-Dec-25-Sheeter-Pass, 28-Jan-26-Air Quality-Pass, 20-Feb-26-Cutting-Pass.

2.5.1 - Validation and Effectiveness (Mandatory)

2.5.1.1 - The methods, responsibility, and criteria for ensuring the effectiveness of all applicable elements of the SQF Program shall be documented and implemented. The methods applied shall validate that: i. Good Manufacturing Practices are confirmed to ensure they achieve the required results; ii. Critical food safety limits are reviewed annually and re-validated or justified by regulatory standards when changes occur; and iii. Changes to the processes or procedures are assessed to ensure the controls are still effective. Records of all validation activities shall be maintained.

Response: Compliant

Summary -

Response: Validation is managed in accordance with P 9.0, dated 21-Aug-20. Validation activities are performed yearly, minimum and validate PRP, HACCP critical limits and any time these elements are revised or changed. Noted that validations were performed as part of the food safety team meeting was conducted as an extension of the management review, dated 13-Mar-26, the HACCP plan and the PRPs were validated.

2.5.2 - Verification Activities (Mandatory)

2.5.2.1 - The methods, responsibility, and criteria for verifying monitoring of Good Manufacturing Practices, critical control points and other food safety controls, and the legality of certified products shall be documented and implemented. The methods applied shall ensure that personnel with responsibility for verifying monitoring activities authorize each verified record.

Response: Compliant

2.5.2.2 - A verification schedule outlining the verification activities, their frequency of completion, and the person responsible for each activity shall be prepared and implemented. Records of verification of activities shall be maintained.

Response: Compliant

Summary -

Response: Verification is managed in accordance with P 9.0, dated 21-Aug-20. Verification activities are performed as part of the SQF site inspection process. Verifications are performed by verifying execution of PRP, GMPs, legality and other food safety elements and are performed via the food safety inspection process, these inspections verify specific plant locations on a rotating basis using the the SQF inspection schedule, all areas are audited at least annually. Reviewed 26-Mar-26-Sheeter-88.2%, 05-Feb-26-Cutting-94.1%,

15-Jan-26-Shipping/Receiving-100%, 18-Dec-25-Office-97.1%, 20-Nov-25-Cutting-100%, 30-Oct-25-Shipping/Receiving-96.1%

2.5.3 - Corrective and Preventative Action (Mandatory)

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

Response: Compliant

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

Response: Compliant

Summary -

Response: Corrective actions generally are completed in cases of customer complaint. Reviewed the following corrective actions: 260102-Incorrect label- CA was issued against the complaint. The CA included the problem statement, root cause, correction and corrective action taken, 260101-Printing Issues-CA was issued against the complaint. The CA included the problem statement, root cause, correction and corrective action taken.251201-Wrong raw material-A was issued against the complaint. The CA included the problem statement, root cause, correction and corrective action taken.

2.5.4 - Internal Audits and Inspections (Mandatory)

2.5.4.1 - An internal audit program shall be established to verify the implementation and effectiveness of all applicable requirements of the SQF Food Safety System. Internal audits shall be conducted in full and at least annually. The methods applied shall ensure: i. All applicable requirements of The SQF Food Safety Code: Manufacture of Food Packaging are audited; ii. Corrective and preventative action of deficiencies identified during the internal audits are undertaken; and iii. Audit results are communicated to relevant management personnel and staff responsible for implementing and verifying corrective actions.

Response: Compliant

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

Response: Compliant

2.5.4.3 - Regular inspections of the site and equipment shall be planned and carried out to verify Good Manufacturing Practices and facilities and equipment maintenance is compliant to the SQF Food Safety Code: the Manufacturing of Food Packaging. The site shall: i. Take corrections or corrective and preventative action; and ii. Maintain records of inspections and any corrective action taken.

Response: Compliant

2.5.4.4 - Records of internal audits and inspections and any corrective and preventative actions taken as a result of internal audits shall be recorded as per 2.5.3. Changes implemented from internal audits that have an impact on

the site's ability to deliver safe food shall require a review of applicable aspects of the SQF System (refer to 2.3.1.3).

Response: Compliant

Summary -

Response: Internal audits are managed in accordance with P 9.0, dated 21-Aug-20. Internal audits are comprised on weekly facility inspections and yearly the SQF code requirements. The SQF system audit was performed over the course of the year using internal checklist and reviewed the requirements of the SQF code. Reviewed report for Module 13 requirements, which were audited on 28-Jan-26- Internal Auditing Basics dated 21-Dec-21. There were no findings issued as the result of this audit. Audit was performed by E. Martinez- Reviewed weekly GMP inspections-26-Mar-26-Sheeter-88.2%, 05-Feb-26-Cutting-94.1%, 15-Jan-26-Shipping/Receiving-100%, 18-Dec-25-Office-97.1%, 20-Nov-25-Cutting-100%, 30-Oct-25-Shipping/Receiving-96.1%

2.6.1 - Product Identification (Mandatory)

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

Response: Compliant

2.6.1.2 - Product start-up and changeover procedures during manufacture of food sector packaging shall be documented and implemented to ensure that the correct product information is applied or labeled and that the changeover is inspected and approved by an authorized person. Product identification records shall be maintained.

Response: Compliant

Summary -

Response: Material identified methods are defined in P 8.0, dated 03-Jul-25 and are identified using the WIP tag, which records both the product identification (part number, job number and trace information). Materials evaluating during the facility portion of the audit were noted to be adequately identified.

2.6.2 - Product Trace (Mandatory)

2.6.2.1 - The responsibility and methods used to trace product shall be documented and implemented to ensure: i. Finished product is traceable to the customer (minimum one step forward) and provides traceability through the process to the supplier and date of receipt of raw materials, auxiliary packaging, processing aids, and other inputs (minimum one step back); ii. Traceability is maintained where product is reworked (refer to 2.4.6); and iii. The effectiveness of the product trace system is tested and documented at least annually as part of the product recall and withdrawal review (refer to 2.6.3.1). Records of raw and auxiliary packaging material receipt and use and finished product dispatch and destination shall be maintained.

Response: Compliant

Summary -

Response: Trace exercises are recorded on form F6.1.2 Mock Recall/Crisis Record, dated 18-Sep-20. The last

trace exercise occurred 20-Feb-26 for Jobs 49953, 50623, 50353, 50345, 50264 . The exercise was 1 up 55 minutes to perform and was 100% effective. A 1 down exercise that was conducted on 25-Aug-25, and reviewed Job 44618, took 30 minutes and was 1 up and 1 down, and was 100% effective.

2.6.3 - Product Withdrawal and Recall (Mandatory)

2.6.3.1 - The responsibility and methods used to withdraw or recall product shall be documented and implemented. The procedure shall: i. Identify those responsible for coordinating, managing, and investigating a product withdrawal or recall with customers; ii. Describe the procedures to be implemented by site management, including sources of legal, regulatory, and expert advice; iii. Outline a communication plan to inform customers, consumers, authorities, and other essential bodies in a timely manner appropriate to the nature of the incident; and iv. Ensure that SQFI, the certification body, and the appropriate regulatory authority are listed as an essential body and notified in instances of a food safety incident of a public nature or product recall for any reason.

Response: Compliant

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

Response: Compliant

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

Response: Compliant

2.6.3.4 - SQFI and the certification body shall be notified in writing within twenty-four (24) hours upon identification of a food safety event that requires public notification. SQFI shall be notified at foodsafetycrisis@sqfi.com.

Response: Compliant

Summary -

Response: Recall methods are defined in P 6.0, dated 06-Aug-20, responsibility is given to members of the recall team. The procedure defines the recall team and the roles of the team, including communication channels and legal experts to be consulted. The procedure requires that in the case of an actual recall, SQFI and the CB will be notified within 24 hours. There were noted to be no actual recalls in the last 12 months. The last trace exercise occurred 20-Feb-26 for Jobs 49953, 50623, 50353, 50345, 50264 . The exercise was 1 up 55 minutes to perform and was 100% effective. A 1 down exercise that was conducted on 25-Aug-25, and reviewed Job 44618, took 30 minutes and included the 1 up and 1 down, and was 100% effective.

2.6.4 - Crisis Management Planning

2.6.4.1 - A crisis management plan that is based on the understanding of known potential dangers (e.g. flood, drought, fire, tsunami, pandemic, or other severe weather or regional events such as warfare, civil unrest, or pandemic) that can impact the site’s ability to deliver safe food sector packaging shall be documented by senior management outlining the methods and responsibility the site shall implement to cope with such a business crisis. The crisis management plan shall include as a minimum: i. A senior manager responsible for decision making, oversight, and initiating actions arising from a crisis management incident; ii. The nomination and training of a crisis management team; iii. The controls implemented to ensure a response does not compromise product safety;

iv. The measures to isolate and identify product affected by a response to a crisis; v. The measures taken to verify the acceptability of food sector packaging prior to release; vi. The preparation and maintenance of a current crisis alert contact list, including supply chain customers; vii. Sources of legal and expert advice; and viii. The responsibility for internal communications and communicating with authorities, external organizations, and media.

Response: Compliant

2.6.4.2 - The crisis management plan shall be reviewed, tested, and verified at least annually. Records of reviews of the crisis management plan shall be maintained.

Response: Compliant

Summary -

Response: The Emergency and contingency plan, dated 09-Feb-26 outline the crisis team and the various roles and responsibilities, the team members and define typical types of issues and the actions to take should the issue be realized. Yearly tests are performed and recorded on F6.1.2 Mock Recall/Crisis Record, dated 18-Sep-20, the last test was performed on 20-Feb-26, and reviewed a water system failure. The test took potential affected product into consideration. Training of staff is managed via the Alchemy training.

2.7.1 - Food Defense Plan (Mandatory)

2.7.1.1 - A food defense threat assessment shall be conducted to identify potential threats that can be caused by a deliberate act of sabotage or terrorist-like incident.

Response: Compliant

2.7.1.2 - A food defense plan shall be documented, implemented and maintained based on the threat assessment (refer to 2.7.1.1). The food defense plan shall meet legislative requirements as applicable and shall include at a minimum: i. The methods, responsibility, and criteria for preventing food adulteration caused by a deliberate act of sabotage or terrorist-like incident ii. The name of the senior site management person responsible for food defense; iii. The methods implemented to ensure only authorized personnel have access to production equipment and vehicles, manufacturing, and storage areas through designated access points; iv. The methods implemented to protect sensitive processing points from intentional adulteration; v. The measures taken to ensure the secure receipt and storage of raw and packaging materials, equipment, and hazardous chemicals; vi. The measures implemented to ensure raw and packaging materials, labels, process inputs, work-in-progress, and finished products are held under secure storage and transportation conditions; and vii. The methods implemented to record and control access to the premises by employees, contractors, and visitors.

Response: Compliant

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

Response: Compliant

2.7.1.4 - The food defense threat assessment and prevention plan shall be reviewed and tested at least annually or when the threat level, as defined in the threat assessment, changes. Records of reviews of the food defense plan shall be maintained.

Response: Compliant

Summary -

Response: The food defense plan was noted to be available, dated 20-Feb-26. The plan covers both internal

and external threats as well as mitigating activities, the site security map was available and dated 13-Mar-25. The plan was reassessed and challenged on 20-Feb-26 by physically checking all external doors.

2.7.2 - Food Fraud (Mandatory)

2.7.2.1 - The methods, responsibility, and criteria for identifying the site's vulnerability to food fraud shall be implemented and maintained. A food fraud vulnerability assessment shall be conducted to identify the site's susceptibility to substitution, mislabeling, and counterfeiting of raw materials and finished product that may adversely impact the food safety of the product.

Response: Compliant

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

Response: Compliant

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

Response: Compliant

2.7.2.4 - The food fraud vulnerability assessment and mitigation plan shall be reviewed and verified at least annually with gaps and corrective actions documented. Records of reviews shall be maintained.

Response: Compliant

Summary -

Response: The food fraud assessment was available and dated 20-Feb-26, it was noted on the assessment that the fraud risk is low due to the commodity (fiberboard, inks and glues), and that the supply base is stable. The last review was conducted as part of the management review process on 13-Mar-26.

2.8.1 - Allergen Management (Mandatory)

2.8.1.1 - The responsibility and methods used to control allergens and to prevent sources of allergens from contaminating food sector packaging shall be documented and implemented. The allergen management program shall include: i. A detailed risk analysis and assessment of workplace-related food allergens, raw materials, printed packaging, and/or processing aids, including food grade lubricants, that may contain food allergens or food allergen statements; ii. A list of allergens that is applicable in the country of manufacture and the country(ies) of destination if known; iii. A list of allergens that is accessible by relevant staff; iv. The food safety hazards associated with allergens and their control incorporated into the food packaging safety plan; v. A management plan for control of identified allergens; vi. Cleaning and sanitation of product contact surfaces between line changeovers is effective, appropriate to the risk and legal requirements, and sufficient to remove all potential target allergens from product contact surfaces; and vii. Based on the risk assessment, procedures for validation and verification of the effectiveness of the cleaning and sanitation of areas and equipment in which allergens are used is effectively implemented.

Response: Compliant

2.8.1.2 - Instructions shall be provided to all relevant staff involved in the receipt or handling of raw materials, work-in progress, rework, or finished product on the identification, handling, storage, and segregation of materials

containing allergens.

Response: Compliant

2.8.1.3 - Sites that do not handle allergenic materials shall document, implement, and maintain an allergen management program that addresses at a minimum the mitigation of introduced unintended allergens through supplier, contract manufacturer, employee, and visitor activities.

Response: Compliant

Summary -

Response: Allergens are addressed in P 10.0, dated 17-Aug-20. Allergens within the facility are incidental as there are no food items produced in the facility. Employee allergen training is performed yearly as part of the employee retraining. Controls for allergen declarations are controlled via plate approval and subsequent first piece printing approvals as part of the printing inspection process, where the allergens statements are verified for legibility, reviewed approvals for in-process orders 50972 and 59673.

2.9.1 - Training Requirements

2.9.1.1 - The responsibility for establishing and implementing the training needs of the site's personnel to ensure they have the required competencies to carry out functions affecting the manufacture of safe food sector packaging and regulatory compliance shall be defined and documented (refer to 2.1.1.6).

Response: Compliant

2.9.1.2 - Appropriate training shall be provided for personnel carrying out the tasks essential to the effective implementation of the SQF System and the maintenance of food safety and regulatory requirements.

Response: Compliant

Summary -

Response: The requirements for competency are defined in the job descriptions, the training requirements for each employee are documented on the training skills matrix.

2.9.2 - Training Program (Mandatory)

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

Response: Compliant

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

Response: Compliant

2.9.2.3 - Training records shall be maintained and include: i. Participant name; ii. Skills description; iii. Description of the training provided; iv. Date training completed; v. Trainer or training provider; and vi. Verification that the trainee is competent to complete the required tasks.

Response: Compliant

Summary -

Response: Training for each position varies depending on competency needs. All employees receive core PRP/GMP training through the use of Alchemy, with different modules being assigned to employees that have different roles, training records show employee name, site, company position, course name, training date(s), status (complete, in process, due), facilitator and effectiveness (score from test). Reviewed records for Dakota-Press: QA-Refresher GMP training was conducted and passed 12-Feb-26. Vanessa-Receiving: QA-Refresher GMP training was conducted and passed 20-Feb-26 Macias-Sheeter: QA-Refresher GMP training was conducted and passed 12-Feb-26, James-Maintenance: QA-Refresher GMP training was conducted and passed 04-Feb-26

13.1.1 - Premises Location and Approval

13.1.1.1 - The site shall assess local activities and the site environment to identify any risks that may have an adverse impact on product safety and implement controls for any identified risks. The assessment shall be reviewed in response to any changes in the local environment or activities. The construction and ongoing operation of the premises on the site shall be approved by the relevant authority.

Response: Compliant

Summary -

Response: Facility was noted to be located in an industrial area, surrounding businesses were deemed to pose no food safety threats. Licenses were available and current, including Fire District License LFIR-2202663.

13.1.2 - Building Materials

13.1.2.1 - Floors shall be constructed of smooth, dense, impact-resistant material that can be effectively graded, drained, are impervious to liquid, and easily cleaned.

Response: Minor

Evidence: • There was noted to be a large crack in the concrete that exposed substrate on the "rail road" wall.

Root Cause: The crack was a pre-existing condition located behind high-density racking. Although the racks were removed during the expansion, the defect was not flagged during subsequent internal GMP audits because the area was previously categorized and inspected as a "sheet rack area." The previous inspection focus for that zone did not prioritize wall visibility due to the permanent placement of the racks.

Corrective Action: 1. The crack was thoroughly cleaned of all loose debris and pre-existing substrate. A high-grade epoxy sealant was applied to the base of the crack to ensure a hermetic seal against leaks and moisture. The repair was then finished with a concrete structural mix to restore the wall's surface. 2. For F 9.2.2.7 Site Inspections - SQF M13. Weekly schedule was updated to include area under Docks, Office, and Pre-stage area instead of Warehouse - Sheets Area to ensure correct inspection 3. To prevent recurrence and improve internal detection, F 9.2.2.7 Site Inspections - SQF M13.has been modified on question 5. Old Requirement: "Floors, Drains and Waste Traps: Are all the above clear and in good condition?" New Requirement: "Floors, Drains and Waste

Traps: Are all the above clear, in good condition, and there are no cracks on walls or floors?"

Verification Of Closeout: Approved based on revision to F 9.2.2.7 Site Inspections - SQF M13.

Completion Date: April 17, 2026 **Closeout Date:** April 29, 2026

13.1.2.2 - Drains shall be constructed and located so they can be easily cleaned and do not present a food safety hazard.

Response: Compliant

13.1.2.3 - Waste trap system shall be located sufficiently far away from any food sector packaging handling area or entrance to the premises to prevent contamination.

Response: Compliant

13.1.2.4 - Walls, partitions, ceilings, and doors shall be of durable construction.

Response: Compliant

13.1.2.5 - In food sector packaging manufacturing, handling, and storage areas, wall-to-wall and wall-to-floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of debris.

Response: Compliant

13.1.2.6 - In food sector packaging manufacturing, handling, and storage areas, doors shall be of solid construction and windows shall be of shatterproof glass or similar material.

Response: Compliant

Summary -

Response: Floors were smooth concrete, there were noted to be no waste traps within the facility. Wall to floor junctions were constructed to allow for cleaning, it was also noted that consideration was given to pallet storage in warehouses to allow for cleaning. Doors were solid and smooth, there were no windows in manufacturing. NC: There was noted to be a large crack in the concrete that exposed substrate on the "rail road" wall.

13.1.3 - Lightings and Light Fittings

13.1.3.1 - Lighting in food sector packaging manufacturing, handling, and storage areas shall be of appropriate intensity to enable the staff to carry out their tasks efficiently and effectively.

Response: Compliant

13.1.3.2 - Light fittings in food sector packaging manufacturing, handling, and storage areas shall be shatterproof, manufactured with a shatterproof covering, or fitted with protective covers and recessed into or fitted flush with the ceiling. Where fixtures cannot be recessed, structures shall be protected from accidental breakage, manufactured from cleanable materials, and included in the cleaning and sanitation program.

Response: Compliant

13.1.3.3 - Light fittings in areas where the product is stored shall be designed to prevent product contamination.

Response: Compliant

Summary -

Response: Lighting was adequate for the work being performed. Lighting was LED shatterproof in processing,

in other areas were fluorescent tubes were in use, these were shatter proof.

13.1.4 - Dust, Insect, and Pest Proofing

13.1.4.1 - All external windows, ventilation openings, doors, and other openings shall be effectively sealed when closed and proofed against dust, vermin, and other pests. External personnel access doors shall be effectively insect-proofed and fitted with a self-closing device and proper seals to protect against entry of dust, vermin, and other pests.

Response: Compliant

13.1.4.2 - Methods shall be in place to adequately control dust that may result from the manufacturing process.

Response: Compliant

13.1.4.3 - External access doors and overhead dock doors used for product, material, pedestrian, or vehicle access shall be effectively designed, maintained, and fitted with proper seals to protect against entry of dust, vermin, and other pests.

Response: Compliant

13.1.4.4 - Electric insect control devices, pheromone, or other traps and baits shall be located so as not to present a contamination risk to food sector packaging or manufacturing equipment. Poison rodenticide bait shall not be used inside food sector packaging manufacturing, handling, or storage areas.

Response: Compliant

Summary -

Response: Doors were closed and entry was via keypads. Controls of dust were adequate for the work being performed. Doors were noted to be sealed.

13.1.5 - Ventilation

13.1.5.1 - Adequate ventilation shall be provided in enclosed packaging manufacture and handling areas.

Response: Compliant

Summary -

Response: Ventilation was adequate for the work being performed. In air intakes were noted be screened.

13.1.6 - Equipment and Utensils

13.1.6.1 - Specifications for new equipment and procedures for purchasing equipment to ensure it is appropriate for the task shall be documented and implemented.

Response: Compliant

13.1.6.2 - Equipment shall be designed, constructed, installed, operated, and maintained so as not to pose a contamination threat to food sector packaging and to allow for cleaning beneath and behind it. Tools, utensils, and containers used for handling raw materials or packaging, work-in-progress, and food sector packaging shall be made of food-safe materials.

Response: Compliant

13.1.6.3 - Vehicles used in food sector packaging manufacturing, handling, or storage areas shall be designed and operated so as not to present a food safety hazard.

Response: Compliant

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

Response: Compliant

13.1.6.5 - In sites where food sector packaging is manufactured, product contact surfaces shall be constructed of materials that will not contribute to a food safety risk to the manufacture of packaging materials.

Response: Compliant

Summary -

Response: Specifications for design and installation and maintenance of equipment was adequate. Equipment in place was installed and operated in a manner that posed no food safety risk. Vehicles used in the processing areas were clean and posed no food safety risk. Utensils were constructed of materials that did not pose a food safety risk and were maintained in serviceable condition. Machine and product handling surfaces were constructed of food grade materials and were smooth and maintained in clean condition.

13.1.7 - Grounds and Roadways

13.1.7.1 - The external grounds and areas surrounding the premises, including external storage buildings, machinery, and equipment shall be maintained to prevent accumulated debris and waste and control vegetation. These areas shall be inspected routinely to ensure they will not attract pests and vermin or present a food safety hazard to the sanitary operation of the site.

Response: Compliant

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

Response: Compliant

Summary -

Response: External grounds were well maintained, areas around the building included a rock barrier. The roadways were paved and in good repair.

13.2.1 - Repairs and Maintenance

13.2.1.1 - The methods and responsibility for the maintenance and repair of the facility, equipment, and buildings shall be documented, planned, and implemented in a manner that minimizes the risk of contamination of food sector packaging material or equipment.

Response: Compliant

13.2.1.2 - Routine maintenance of the equipment in any food sector packaging manufacturing, handling, or storage area shall be performed according to a maintenance control schedule and recorded. The maintenance schedule shall include the building, equipment, vehicles, and other areas of the premises critical to the maintenance of food

safety.

Response: Compliant

13.2.1.3 - Equipment failures shall be documented, and repair activities shall be incorporated into the maintenance schedule.

Response: Compliant

13.2.1.4 - Site supervisors shall be notified when maintenance or repairs are to be undertaken in any food sector packaging manufacturing, handling, or storage area.

Response: Compliant

13.2.1.5 - The maintenance supervisor and the site supervisor shall be informed if any repairs or maintenance pose a potential threat to food safety from foreign objects or contaminants (e.g., pieces of electrical wire, damaged light fittings, and loose overhead fittings). When possible, maintenance is to be conducted outside manufacturing times.

Response: Compliant

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

Response: Compliant

13.2.1.7 - Equipment located over raw or packaging materials, food sector packaging, or product conveyors shall be lubricated with food grade lubricants and their use controlled to minimize the contamination of the product. Machinery lubricant controls shall be in place to prevent contamination of food sector packaging from gear box oils, bearing lubricants, hydraulics, or any other source.

Response: Compliant

13.2.1.8 - Paint used in food sector packaging manufacturing, handling, and storage areas and product contact zones shall be suitable for use, intact, and free of chips and shall not be used on any food contact surfaces.

Response: Compliant

Summary -

Response: Maintenance records are maintained in the MP9 program, the program maintains the PM schedule as well as repair work orders. Work orders define the machine to be maintained, the maintenance tasks to be completed and the required post maintenance activities, including verification that tools have been removed and the machine is process ready. Food grade grease was on a labeled shelf and was used for equipment that could potentially come into contact with product. There was noted to be no machine paint stored at the facility. Preventive Maintenance frequency varies by machine, including daily, weekly, monthly or as need. Reviewed the maintenance records: Bobst 145 Cutting Machine-The maintenance record included the daily maintenance Jan-2025 WO 003690, Feb-2025 WO 003748, Mar-2025 WO 003770,Apr-2025-003818, May-25 WO 003854, Jun 2025 WO 003894, Jul 2025 WO 003927, Aug 2025 WO 003977, Sep 2025 004013, Oct 2025 WO 004051, Nov 2025 WO 004089, Dec 2025 WO 004127 Bobst 145 Expertfold Machine Jan-2025 WO 003696, Feb-2025 WO 003749, Mar-2025 WO 003778 ,Apr-2025-003811, May-25 WO 003859, Jun 2025 WO 003897, Jul 2025 WO 003944, Aug 2025 WO 003980, Sep 2025 004014, Oct 2025 WO 004070, Nov 2025 WO 004094, Dec 2025 WO 004131 Supervisors are advised after maintenance to ensure that tools are removed and they verify the machine is work ready.

13.2.2 - Maintenance Staff and Contractors

13.2.2.1 - Maintenance staff and contractors shall comply with the site's personnel hygiene requirements (refer to 13.3.4).

Response: Compliant

13.2.2.2 - All maintenance and other engineering contractors required to work on-site shall be trained in the site's food safety and hygiene procedures or shall be escorted at all times until their work is completed.

Response: Compliant

13.2.2.3 - Maintenance staff and contractors shall remove all tools, parts, and debris from areas where maintenance and repairs were conducted once it has been completed. They shall inform the appropriate supervisor so that hygiene and sanitation actions and a pre-operational inspection can be conducted prior to the restarting of operations.

Response: Compliant

Summary -

Response: Maintenance staff is required to attend and pass GMP refresher training, contractors are required to review company visitor GMPs and sign in and out. Supervisors are advised after maintenance to ensure that tools are removed and they verify the machine is work ready.

13.2.3 - Calibration

13.2.3.1 - The methods and responsibility for calibration and re-calibration of measuring, testing, and inspection equipment used for monitoring activities outlined in prerequisite programs, food safety plans and other process controls, or to demonstrate compliance with customer specifications shall be documented and implemented. Software used for such activities shall be validated as appropriate.

Response: Compliant

13.2.3.2 - Procedures shall be documented and implemented to address the resolution of potentially affected food sector packaging should measuring, testing, and inspection equipment be found to be out of calibration state.

Response: Compliant

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

Response: Compliant

13.2.3.4 - Equipment shall be calibrated against national or international reference standards and methods or to an accuracy appropriate to its use. In cases where standards are not available, the site shall provide evidence to support the calibration reference method applied.

Response: Compliant

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

Response: Compliant

13.2.3.6 - A directory of measuring, testing, and inspection equipment requiring calibration and records of calibration tests shall be maintained.

Response: Compliant

Summary -

Response: Calibrations are managed in accordance with procedure P 7.0, dated 01-Nov-21. Calibration master records are maintained via the calibration list, dated 30-Apr-20. Calibrations include scales, and measuring equipment such as calipers and micrometers. Scales are calibrated by Sun City Scale (an approved supplier, NIST Traceable) and IM&TE are calibrated internally using master gage blocks. Reviewed calibrations for Master Gage block by SM Scales and Metrology on certificate10520 due 28-Sep-26, it was noted that the calibration certificate was NIST traceable and the gages were acceptable as found and as left. Micrometer 12177187-Due 20-May-26-Internally calibrated, acceptable as found and as left, Micrometer 171407-Due 23-Jun-26-Internally calibrated, acceptable as found and as left, Micrometer 19080587-Due 14-Jul-26-Internally calibrated, acceptable as found and as left.

13.2.4 - Pest Prevention

13.2.4.1 - A documented pest prevention program shall be effectively implemented. It shall: i. Describe the methods and responsibility for the development, implementation, and maintenance of the pest prevention program; ii. Record pest sightings and trend the frequency of pest activity to target pesticide applications; iii. Outline the methods used to prevent pest problems; iv. Outline the pest elimination methods and the appropriate documentation for each inspection; v. Outline the frequency with which pest status is to be checked; vi. Include on a site map the identification, location, number, and type of applied pest control/ monitoring devices; vii. List the chemicals used. The chemicals are required to be approved by the relevant authority and their Safety Data Sheets (SDS) made available; viii. Outline the methods used to make staff aware of the bait control program and the measures to take when they come into contact with a bait station; ix. Outline the requirements for staff awareness and training in the use of pest and vermin control chemicals and baits; and x. Measure the effectiveness of the program to verify the elimination of applicable pests and identify trends.

Response: Minor

Evidence: • It was noted that there were bait stations located inside of the facility that had no identification regarding the location on the wall regarding where the proper location for these devices was.

Root Cause: While devices were individually labeled, the facility lacked consistent secondary wall signage. Due to the recent facility expansion and reorganization, previous markings were either removed or not applied to the new station placements

Corrective Action: 1. A facility-wide standardization project was completed for all internal bait stations. Every station now features a permanent identification marker on the wall directly behind the trap. These markers include the statement: "Pest control location, Do not obstruct." This ensures traps are returned to their precise location if moved for cleaning 2. Question #8 of the F 9.2.2.7 Site Inspections - SQF M13 Survey was officially modified to ensure continuous verification of these markers. - Old Statement: "Dust, Insect and Pest Proofing: Are access doors Insect proofed?" - New Statement: "Dust, Insect and Pest Proofing: Are access doors insect proofed, and are all pest control stations in their designated locations with visible wall identification?"

Verification Of Closeout: Approved based on revision to #8 of the F 9.2.2.7 Site Inspections - SQF M13 Survey

Completion Date: April 24, 2026 **Closeout Date:** April 29, 2026

13.2.4.2 - Pest contractors and/or internal pest controllers shall: i. Be licensed and approved by the local relevant authority; ii. Use only trained and qualified operators who comply with regulatory requirements; iii. Use only approved chemicals; iv. Provide a pest prevention plan (refer to 2.3.2.7) that includes a site map indicating the

location of bait stations, traps, and other applicable pest control monitoring devices; v. Report to a responsible authorized person on entering the premises and after the completion of inspections or treatments; vi. Provide regular inspections for pest activity with appropriate action taken if pests are present; and vii. Provide a written report of their findings and the inspections and treatments applied.

Response: Compliant

13.2.4.3 - Pest activity risks shall be analyzed and recorded. Inspections for pest activity shall be undertaken on a regular basis by trained site personnel and the appropriate action taken if pests are present. Identified pest activity shall not present a risk of contamination to raw materials or food sector packaging. Records of all pest control inspections and applications shall be maintained.

Response: Compliant

13.2.4.4 - Raw materials or packaging, processing aids, work-in-progress, or food sector packaging that is found to be contaminated by pest activity shall be effectively disposed of and the source of pest infestation investigated and resolved.

Response: Compliant

13.2.4.5 - Pesticides shall be clearly labeled and stored per 13.6.2 if kept on-site.

Response: Compliant

13.2.4.6 - No animals shall be permitted on-site in food sector packaging manufacturing, handling, or storage areas.

Response: Compliant

Summary -

Response: Pest management is outsourced to an Integrated Pest Management company (Waves Pest Control Co.), the signed contract was on file. The pest device map was available, dated 09-Jan-26. The technician-L. Ramos holds a Texas Department of Agriculture Commercial Certified Applicator License 0561704, exp 31-jUL-26 and the company holds a Texas Department of Agriculture SPCS Business License 0570812, exp 31-Jul-26. Reviewed service reports from Jun-25 through Mar-26, noted that sightings are recorded and trended, in cases where issues are identified, actions are taken to address these identified items. Insurance record was available and expiration 08-Jul-26. The applications were recorded in the applications log, which listed the chemical applied, the concentration, amount applied, EPA number, target pest and where applied. Noted that SDS were available for each chemical applied. Pesticides are not stored on site. Animals are not permitted on the property. NC: It was noted that there were bait stations located inside of the facility that had no identification regarding the location on the wall regarding where the proper location for these devices was.

13.2.5 - Cleaning and Sanitation

13.2.5.1 - The methods and responsibility for the effective cleaning of food sector packaging manufacturing, handling and storage areas, and staff amenities shall be documented and implemented.

Response: Compliant

13.2.5.2 - Cleaning equipment, tools, racks, and other items used in support of the cleaning and sanitizing program shall be clearly identified, stored, and maintained in a manner that prevents contamination of food sector packaging manufacturing, handling, and storage areas and equipment.

Response: Compliant

13.2.5.3 - Adjacent production equipment shall be covered or shut down and raw and packaging materials, work-in-progress, and food sector packaging shall be moved from the vicinity if using compressed air hoses to clean.

Response: Compliant

13.2.5.4 - Pre-operational inspections shall be conducted following cleaning and sanitation operations to ensure manufacturing areas, product contact surfaces, equipment, staff amenities, and other essential areas are clean before the start of production. Inspections shall be conducted by qualified personnel to ensure the areas are cleaned at a defined frequency.

Response: Compliant

13.2.5.5 - The responsibility and methods used to verify the effectiveness of the cleaning procedures shall be documented and implemented. A verification schedule shall be prepared. A record of pre-operational hygiene inspections, cleaning and sanitation activities, and verification activities shall be maintained.

Response: Compliant

13.2.5.6 - Appropriate cleaning agents shall be purchased in accordance with applicable legislation and suitable for use. The site shall ensure that only trained staff handle cleaning agents and that it is according to manufacturer instructions. Documentation, storage, usage, and disposal of cleaning agents shall comply with 13.6.2.

Response: Compliant

Summary -

Response: Cleaning is managed via the use of the cleaning logs which assign Janitorial staff to clean the warehouse, the restrooms and break areas. The facility uses clean as you go for most facility cleaning, there are weekly preoperational inspections performed on the areas, in cases where deficiencies are noted during these inspections, follow up emails are sent to the process owner. The process owner is responsible for cleaning those areas and reporting back on the cleanliness. Reviewed deficiencies Reviewed the schedule for 2026. Reviewed Work Order 004142 where deficiencies were noted the areas were noted to be recleaned and approved. Restroom and break room cleaning is performed and recorded on the Production Restroom Cleaning Schedule Form, reviewed these records for Production RR (W) and Production RR (M) and Production Breakroom noted that 2025 week 1-52 for 2025 were available and complete for all these areas, as well as weeks 1-8 of 2026.

13.3.1 - Personnel Welfare

13.3.1.1 - Personnel who are known to be carriers of infectious diseases that present a health risk to others on-site shall not engage in the manufacture of food sector packaging or enter areas where food sector packaging is exposed. Code Amendment #1 A medical screening procedure shall be in place for all employees, visitors and contractors who handle exposed product or food contact surfaces.

Response: Compliant

13.3.1.2 - The site shall have measures in place to prevent contact of raw and packaging materials, work-in-progress, food sector packaging, and product contact surfaces from any bodily fluids, open wounds, coughing, sneezing, spitting, or any other means. In the event of an injury that causes spillage of bodily fluid, a properly trained employee shall ensure that all affected areas have been adequately cleaned and that all affected materials have been quarantined and/or disposed of.

Response: Compliant

13.3.1.3 - Personnel with exposed cuts, sores, or lesions shall not engage in handling raw and packaging materials, work-in-progress, food sector packaging, and product contact surfaces. Minor cuts or abrasions on exposed parts of the body shall be covered with a colored bandage containing a metal-detectable strip or an alternative suitable waterproof and colored dressing.

Response: Compliant

Summary -

Response: Disease control is addressed via the company GMP policies. All staff receives GMP training as part of orientation and yearly during refresher training using the Alchemy training system, employees are also trained to report any body fluid contamination of product or raw materials. Cuts or other wounds are to be covered, there were no employees noted with any exposed wounds. Health screening is managed per GMP policy.

13.3.2 - Handwashing

13.3.2.1 - Personnel shall have clean hands, and hands shall be washed by all personnel, including staff, contractors, and visitors: i. On entering production areas; ii. After each visit to a toilet; iii. After using a handkerchief; iv. After smoking, eating, or drinking; and v. After handling waste or chemicals.

Response: Compliant

13.3.2.2 - Handwash stations shall be provided in appropriate areas that support the capability of site personnel and visitors to wash their hands as outlined in 13.3.2.3.

Response: Compliant

13.3.2.3 - Handwash stations shall have: i. Basins constructed of stainless steel or similar non-corrosive material; ii. A potable water supply at an appropriate temperature; iii. Liquid hand soap within a fixed dispenser; iv. Paper towels or effective hand dryer; and v. A means of containing used paper towels.

Response: Compliant

13.3.2.4 - Signage in appropriate languages instructing people to wash their hands before entering the food sector packaging manufacturing, handling, and storage areas shall be provided in a prominent position in break rooms, at break rooms exits, toilet rooms, and in outside eating areas if applicable.

Response: Compliant

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

Response: Compliant

Summary -

Response: Employees are to wash hands when entering processing, when returning from breaks, after smoking, after hand to floor contact and after using the restroom. It was noted that there were hand wash signs in both English and Spanish in strategic locations (employee entrances, break room, bathrooms). There were an adequate number of sinks located inside of restrooms, adjacent to breakroom and outside break area doors, as well as near employee entrances. The hand was sinks were food grade, had adequate soap and hand driers. Disposable gloves are not typically utilized in processing.

13.3.3 - Clothing and Personal Effects

13.3.3.1 - The site shall have a clothing and hair policy that protects raw and packaging materials, work-in-progress, food sector packaging, and product contact surfaces from unintentional contamination.

Response: Compliant

13.3.3.2 - Clothing worn by staff engaged in handling food sector packaging shall be maintained, stored, laundered, and worn so as not to present a contamination risk to products.

Response: Compliant

13.3.3.3 - Clothing worn by staff engaged in manufacturing and warehouse processes shall be made from materials that will not contaminate raw and packaging materials, work-in-progress, and food sector packaging. Clothing and shoes shall be clean at the commencement of each shift, maintained in a serviceable condition, and changed where they present a product contamination risk.

Response: Compliant

13.3.3.4 - When protective clothing (e.g. frocks, smocks, aprons, boots, gloves, face shields, etc.) is used, hooks racks, cabinets, or other forms of off the floor storage shall be provided for temporary storage when staff leave the manufacturing area and shall be provided in close proximity or adjacent to the personnel access doors and handwashing stations. All clothing stored on-site shall be maintained and stored so as not to present a contamination risk to raw or packaging materials, work-in-progress, and food sector packaging.

Response: Compliant

13.3.3.5 - Gloves used when handling food sector packaging material shall be clean and replaced when needed.

Response: Compliant

13.3.3.6 - Jewelry and other loose objects shall not be worn or taken into any area where raw and packaging materials, work-in-progress, or food sector packaging is exposed. Wearing plain bands with no stones and medical alert bracelets that cannot be removed can be permitted; however, the site will need to consider their customer requirements and the applicable food legislation.

Response: Compliant

13.3.3.7 - All exceptions shall meet regulatory and customer requirements and shall be subject to a risk assessment and evidence of ongoing risk management.

Response: Compliant

Summary -

Response: Clothing and hair policy is addressed in the GMPs. Employees are required to wear clean clothing at the start of each shift. Personal effects are to be stored in lockers. Employees are not allowed to wear jewelry, except closed bands with no stones. Eating, drinking (except water in closed containers), consumption of tobacco or vaping, and spitting are not permitted in processing areas.

13.3.4 - Visitors

13.3.4.1 - All visitors shall be trained in, and comply with, applicable food safety and hygiene procedures before entering food sector packaging manufacturing, handling, or storage areas. Visitors shall be trained in, and comply with, additional food safety policies, such as maintenance and cleaning procedures, as appropriate to the purpose of the visit. Where applicable, policies shall define exceptions for visitors when they are escorted at all times.

Response: Compliant

13.3.4.2 - All visitors shall wear suitable clothing and footwear when entering any food sector packaging manufacturing, handling, or storage areas.

Response: Compliant

13.3.4.3 - Visitors shall enter and exit food sector packaging manufacturing, handling, and storage areas through the designated entrance points.

Response: Compliant

13.3.4.4 - Visitors exhibiting visible signs of illness shall be prevented from entering areas in which food sector packaging is handled or processed.

Response: Compliant

Summary -

Response: Visitors are required to sign in and review and sign off on the facility GMP policy. Visitors enter processing areas via either the front entrance. Visitors are typically escorted when on site.

13.3.5 - Staff Amenities (change rooms, toilets, break rooms)

13.3.5.1 - Staff amenities shall have documented cleaning procedures, be supplied with appropriate lighting and ventilation, and shall be made available for the use of all persons engaged in the handling and storage of food sector packaging.

Response: Compliant

13.3.5.2 - Where applicable, facilities shall be provided to enable staff to change into and out of protective clothing as required. Provision shall be made for staff to store their street clothing and personal items separate from food sector packaging manufacturing, handling, or storage areas.

Response: Compliant

13.3.5.3 - Toilet rooms shall be: i. Designed and constructed so that they are separate from any food sector packaging manufacturing, handling, or storage areas; ii. Accessed from operations via an airlock vented to the exterior or through an adjoining room; iii. Sufficient in number for the maximum number of staff; iv. Constructed so that they can be easily cleaned and maintained; v. Include an area inside or nearby for storing protective clothing, outer garments, and other items while using the facilities; and vi. Kept clean and tidy. Tools/equipment used for cleaning toilet rooms shall not be used to clean food sector packaging manufacturing areas.

Response: Compliant

13.3.5.4 - Sanitary drainage shall not be connected to any other drains within the premises and shall be directed to a septic tank or a sewerage system in accordance with regulations.

Response: Compliant

13.3.5.5 - A procedure shall document how to minimize the potential for contamination to the premises, personnel, raw and packaging materials, work-in-progress, and food sector packaging in the event of a sewage backup.

Response: Compliant

13.3.5.6 - Handwash stations shall be provided immediately outside or inside the toilet room and designed as outlined in 13.3.2.3.

Response: Compliant

13.3.5.7 - Separate break room facilities shall be provided away from food sector packaging manufacturing, handling, or storage areas. Break rooms shall be kept clean and tidy and free from waste materials and pests.

Response: Compliant

13.3.5.8 - Where outside eating areas are provided, they should be kept clean and free from waste materials and maintained in a manner that minimizes the potential for introduction of contamination including pests to the site.

Response: Compliant

Summary -

Response: Staff amenities were noted to be cleaned 3 times per shift. There was noted to be an adequate number of restrooms that were supplied with both hot and cold water, soap, and hand driers, additionally hand wash signs were available in both English and Spanish. The restrooms were adequately ventilated and lit and were designed and constructed in a manner that posed no threat to products being produced in the facility. The break area was sufficient for the staff size, and contained microwaves and refrigeration, there was noted to be a large hand wash sink outside the break area. The area provided for eating outside was maintained in good condition.

13.4.1 - Staff Engaged in Food Handling and Processing Operations

13.4.1.1 - All personnel engaged in food sector packaging manufacture, handling, and storage operations shall comply with the following practices: i. Personnel entry to production areas shall be through designated access doors only; ii. All doors are to be kept closed. Doors shall not be left open for extended periods when access is required for waste removal or receiving of product/ingredient/packaging; iii. Raw and packaging materials, work-in-progress, and food sector packaging shall be maintained appropriately, kept off the floor when applicable, and handled and stored in a manner to prevent damage and contamination; and iv. Waste shall be contained in the bins identified for this purpose and removed from the manufacturing area on a regular basis and not left to accumulate.

Response: Compliant

13.4.1.2 - Personnel working in or visiting food sector packaging manufacturing, handling, or storage operations shall ensure that: i. Eating, drinking, smoking, or spitting is not permitted in areas where food sector packaging is manufactured, handled, stored, or exposed. ii. Drinking water is permitted in food sector packaging manufacturing, handling, and storage areas in a method that will not cause a food safety risk to raw and packaging materials, work-in-progress, food sector packaging, and equipment.

Response: Compliant

13.4.1.3 - The manufacturing process shall be controlled such that food sector packaging is safe and free from contamination. Procedures shall be in place to prevent cross-contamination of food sector packaging from contaminated materials, cleaning agents, or chemicals.

Response: Compliant

13.4.1.4 - The flow of personnel in food sector packaging manufacturing, storage, and handling areas shall be managed such that the potential for contamination is minimized.

Response: Compliant

Summary -

Response: The process flow is in a manner that minimizes cross flow of employees, raw materials, WIP and

finished product. Employees are required to enter through designated doors, that require access codes to enter. Eating, drinking (except water in closed containers), consumption of tobacco or vaping, and spitting are not permitted in processing areas.

13.5.1 - Water Supply

13.5.1.1 - Adequate supplies of hot and cold clean water shall be provided for use during manufacturing operations as needed and to enable effective cleaning of the premises and equipment.

Response: Compliant

13.5.1.2 - The delivery of water within the premises shall ensure potable water is not contaminated. Testing of the backflow system, where possible, shall be conducted at least annually and records shall be maintained.

Response: Compliant

13.5.1.3 - The use of non-potable water shall be controlled such that: i. There is no cross-contamination between potable and non-potable water lines; ii. Non-potable water piping and outlets are clearly identified; and iii. Hoses, taps, and other similar sources of possible contamination are designed to prevent back flow or back siphonage.

Response: Compliant

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

Response: Compliant

Summary -

Response: Water supplies are from a municipal source, the supply was adequate. Hot and cold water was readily available for cleaning and hand washing. The facility uses an reverse osmosis system, RO water is stored on site. The RO system is maintained by an approved outside supplier. Backflow devices are tested by the El Paso Fire Department the last test was performed 06-Nov-25, the backflow is tested every 5 years.

13.5.2 - Water Quality

13.5.2.1 - Water shall comply with local, national, or internationally recognized potable water microbiological and quality standards as required when used for: i. Handwashing; ii. As a raw material or processing aid; iii. Cleaning of product contact surfaces and equipment; or iv. The manufacture of steam that will come into contact with food sector packaging or used to heat water that will come into contact with food sector packaging.

Response: Compliant

13.5.2.2 - Microbiological analysis of the water supply shall be conducted to verify the cleanliness of the supply, the monitoring activities, and the effectiveness of the treatment measures implemented. Samples for analysis shall be taken on-site at sources supplying water for the process, handwashing, and/or cleaning, or from within the site. The frequency of analysis shall be risk-based and at a minimum annually.

Response: Compliant

13.5.2.3 - Water shall be analyzed using reference standards and methods.

Response: Compliant

Summary -

Response: Reviewed the 2024 city of El Paso water report, which was on file. The report indicated that the water was potable and that there were no issues related to heavy metals or other contaminants.

13.5.3 - Air and Other Gases

13.5.3.1 - Dry ice, compressed air, and other gasses (e.g., nitrogen, carbon dioxide) that contact food sector packaging or product contact surfaces shall be food-grade, clean, and present no risk to food safety.

Response: Compliant

13.5.3.2 - Compressed air and other systems used to store or dispense gases that come into contact with food sector packaging or product contact surfaces shall be maintained and regularly monitored for quality and potential food safety hazards. The frequency of analysis shall be risk-based and at a minimum annually.

Response: Compliant

Summary -

Response: Compressed air is tested yearly, internally using the last test was performed 28-Jan-26 , the swab test was performed using Hygiena Proclean, the test results showed a pass for air quality. Swabs exp was noted to be 21-Oct-26.

13.6.1 - Storage of Materials and Product

13.6.1.1 - The site shall document and implement a storage plan that allows for the safe, hygienic storage of raw and packaging materials, work-in-progress, food sector packaging, finished product returns, production equipment, processing aids, and chemicals that impact food safety.

Response: Compliant

13.6.1.2 - The responsibility and methods for ensuring effective stock rotation principles are applied shall be documented and implemented to ensure that all raw materials, work-in-progress, rework, and food sector packaging are utilized within their designated shelf life, where applicable.

Response: Compliant

13.6.1.3 - Equipment storage rooms shall be designed and constructed to allow equipment to be stored in a hygienic manner.

Response: Compliant

13.6.1.4 - Where raw and packaging materials, work-in-progress, and food sector packaging are held under temporary or overflow conditions that are not designed for the safe storage of those goods, a risk analysis shall be performed to ensure the integrity of those goods is maintained, they are not at risk of contamination, and there are no other food safety concerns.

Response: Compliant

13.6.1.5 - Rooms and equipment used for the storage of raw and packaging materials, work-in-progress, and food sector packaging shall be constructed to protect the product from contamination and deterioration.

Response: Compliant

13.6.1.6 - Where required, procedures shall be in place for effective storage of printing plates, cylinders, and print blankets.

Response: Compliant

Summary -

Response: Storage and rotation of stock are defined in P 8.0, dated 03-Jul-25. FIFO is in use at the facility for raw materials and finished goods. There was noted to be no temporary storage. Storage areas were designed in a manner to minimize potential food safety issues. Materials are stored off the floor. Plate storage was in racks that were identified with plate number.

13.6.2 - Storage and Use of Hazardous Chemicals and Toxic Substances

13.6.2.1 - Hazardous chemicals and toxic substances, including solvents and agents with the potential for contamination of food sector packaging, shall be: i. Clearly labelled, identifying and matching the contents with their containers; ii. Included in a current list of all chemicals and toxic substances that are stored on-site; and iii. Supplemented with a current Safety Data Sheet (SDS) that is made available to all staff.

Response: Compliant

13.6.2.2 - Storage of hazardous chemicals and toxic substances shall be: i. Located in an area with appropriate signage indicating that the area is for hazardous storage; ii. Controlled, lockable, and accessible only by personnel trained in the storage and use of chemicals; iii. Adequately ventilated; iv. Stored where intended and not comingled (e.g., food versus non-food grade); v. Designed such that there is no cross-contamination between chemicals; and vi. Stored in a manner that prevents hazards to raw and packaging materials, work-in-progress, food sector packaging, and product contact surfaces.

Response: Compliant

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

Response: Compliant

13.6.2.4 - Employees who handle hazardous chemicals and toxic substances, including pesticides and cleaning chemicals, shall: i. Be properly trained on handling and usage; ii. Be provided with first aid equipment and personnel protective equipment; and iii. Ensure compliance to the proper identification, storage, usage, disposal, and clean-up requirements as defined.

Response: Compliant

13.6.2.5 - The site shall dispose of obsolete inventory and empty containers of chemicals, pesticides, and toxic substances in accordance with site and regulatory requirements and ensure that: i. Single-use containers are not reused; ii. Containers are segregated and securely stored prior to collection; and iii. Containers are disposed through an appropriate vendor.

Response: Compliant

13.6.2.6 - In the event of a hazardous chemical or toxic substance spill, the site shall: i. Have spillage clean-up instructions to ensure that the spill is properly contained; and ii. Be equipped with spillage kits and cleaning equipment.

Response: Compliant

Summary -

Response: Chemicals approval is the responsibility of the Continuous Improvement Coordinator. Approved chemicals are documented on the SDS list. Hazardous chemicals were noted to be maintained within the maintenance area in locked chemical storage cabinets, or within the Ink Room, which is locked with an attendant on duty, adequate ventilation was noted. Employees are taught chemical handling as part of employee training. Reviewed approved chemicals Omega Plate Cleaner-SDS on file, and Isopropyl Alcohol-SDS on file. A spill kit was noted to be available.

13.6.3 - Loading, Transport, and Unloading Practices

13.6.3.1 - The practices applied during transport, loading, and unloading of raw and packaging materials and food sector packaging shall be documented and implemented. Practices shall be conducted to prevent cross-contamination, maintain appropriate storage conditions, and ensure product integrity.

Response: Compliant

13.6.3.2 - Vehicles (e.g., semi-trucks, trailers, vans, containers) used for transporting food sector packaging shall be inspected prior to loading to ensure they are clean, in good repair, suitable for the purpose, and free from odors or other conditions that may impact negatively on the food sector packaging.

Response: Compliant

13.6.3.3 - Vehicles (e.g. semi-trucks, trailers, vans, containers) used for transporting food sector packaging from the site shall be secured from tampering using a seal or other acceptable device or system as agreed upon by the carrier and customer.

Response: Compliant

Summary -

Response: Loading and unloading are addressed in W8.6.4, dated 05-Aug-25 responsibility is given to shipping and receiving. Inbound trailers are inspected for condition, odor, pest activity and potential contaminants, in cases where inbound trailers are not LTL, they are additionally verified to have seals in tact, seal numbers are recorded on receiving paperwork. Outbound full loads are sealed (seal numbers are recorded on the BOL) and are inspected for condition, odor, pest activity and potential contaminants. Reviewed inbound inspection on shipper PO 10825 inspection was documented on F.8.6.4.2 including trailer condition inside for pests. Reviewed outbound load on BOL 17017-inspection was documented on F.8.6.4.2 including trailer condition inside for pests.

13.7.1 - Control of Foreign Matter Contamination

13.7.1.1 - The responsibility and methods used to prevent foreign matter contamination of raw and packaging materials, work-in-progress, food sector packaging, and product contact surfaces shall be documented, implemented, and communicated to all staff.

Response: Compliant

13.7.1.2 - Inspections shall be performed to ensure that the site and equipment remain in good condition and equipment has not become detached or deteriorated and is free from potential contaminants.

Response: Compliant

13.7.1.3 - Containers, storage and transport vessels, equipment, utensils, and tools made of glass, porcelain,

ceramics, and brittle plastics shall not be permitted in food sector packaging manufacturing, handling, and storage areas. Exceptions shall include product made from, or packaged in these materials, measurement instruments with glass dial covers or MIG thermometers required under regulation or part of the processing equipment, and other essential items shielded with shatterproof coverings.

Response: Compliant

13.7.1.4 - Glass, porcelain, ceramics, and brittle plastics that are permitted in manufacturing areas shall be listed on a glass inventory and inspected at a frequency based on risk to confirm that they have not been damaged or to monitor for further damage prior to repair or replacement. Regular inspections of product handling/contact zones shall be conducted (refer to 2.5.4.3) to ensure they are free of glass or similar material and to establish changes to the condition of objects listed in the glass inventory.

Response: Compliant

13.7.1.5 - Wooden pallets and other wooden objects used in food sector packaging manufacturing, handling, and storage areas shall be dedicated for that purpose, clean, and maintained in good order. Their condition shall be subject to regular inspection.

Response: Compliant

13.7.1.6 - Wooden pallets, wooden top frames, and wooden utensils used in food sector packaging, manufacturing, handling, and storage areas shall be dedicated for that purpose, clean, maintained in good order, and subject to regular inspection.

Response: Compliant

13.7.1.7 - Loose, deteriorated, or damaged objects on and above structures and equipment in food sector packaging manufacturing, handling, and storage areas shall be controlled, repaired, or replaced to prevent foreign object contamination and other food safety hazards affecting raw and packaging materials, work-in-progress, and food sector packaging.

Response: Compliant

13.7.1.8 - Knives and cutting tools used in manufacturing operations shall be controlled, kept clean, and well maintained so as not to present a hazard to raw materials, work-in progress, or food sector packaging. Snap-off blades shall not be used in food sector packaging manufacturing, handling, or storage areas.

Response: Minor

Evidence: • It was noted that a packer on line 110 had a cutting tool with a snap off blade.

Root Cause: Employee lack of awareness regarding the specific ban on "snap-off" blades and the risk of metal contamination from segmented tools. The employee orientation program was inadequate as it did not include the prohibition of snap-off blades and the possible contamination risks.

Corrective Action: 1a. A dedicated training segment has been added to the Monthly Safety & Quality Video shown on loop in the employee cafeteria. This visual aid explicitly prohibits outside tools 1b. New Hire Training: The Employee Orientation Program has been updated to include a specific module on Tool Control. New employees are now explicitly instructed that only company-issued, and fixed-blade safety cutters are permitted

Verification Of Closeout: Approved based on updating onboarding training.

Completion Date: April 17, 2026 **Closeout Date:** April 29, 2026

Summary -

Response: Glass and brittle plastic are maintained on the SQF Glass& Plastic list, maintenance of this

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document is the responsibility of the SQF Practitioner. The list is verified on a monthly basis. Reviewed glass and brittle plastics inspections for 18-Feb-26-no issues, 10-DEC-25-1 issue noted and in process, 29-Nov-25-5 items needing repair17-Sep-25-1 item needing repair, issues were corrected. Wood pallets are verified prior to use, damaged pallets are discarded. No loose or damaged items that could potentially affect food safety of the packaging were noted. NC: It was noted that a packer on line 110 had a cutting tool with a snap off blade.

13.7.2 - Managing Foreign Matter Contamination Incidents

13.7.2.1 - In circumstances where glass or similar brittle material breakage occurs, the affected area and equipment shall be isolated, cleaned, and thoroughly inspected prior to restarting operations. Utensils and equipment used for clean-up and footwear of those walking in the vicinity shall be inspected and cleaned if necessary.

Response: Compliant

Summary -

Response: There were noted to be no glass breaks that required clean ups.

13.8.1 - Waste Disposal

13.8.1.1 - The responsibility and methods used to collect, handle, and store waste prior to removal from the premises shall be documented and implemented. This shall include consideration of the path of waste removal to prevent cross contamination in food sector packaging manufacturing, handling, and storage areas. Disposal of hazardous chemicals and toxic substances shall comply with 13.6.2.5.

Response: Compliant

13.8.1.2 - Waste shall be contained in bins identified for its purpose, located in designated areas, and removed at a routine frequency that avoids build-up in food sector packaging, manufacturing, handling, and storage areas.

Response: Compliant

13.8.1.3 - Waste disposal equipment, trolleys, vehicles, and collection bins shall be maintained in a serviceable condition and cleaned regularly so as not to attract pests and other vermin. Designated waste accumulation and storage areas shall be well-maintained while awaiting external collection.

Response: Compliant

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

Response: Compliant

13.8.1.5 - Where applicable, a documented procedure shall be in place for the controlled disposal of trademarked or printed packaging materials and finished products. Where a contracted disposal service is used, the disposal process shall be reviewed regularly to confirm compliance.

Response: Compliant

Summary -

Response: Liquid waste is stored in 55 gallon drums, and is removed on an as needed basis by a licensed hauler. Dry waste is either disposed of in a dumpster, or if fiberboard, the waste is bailed for recycling. Dry waste in the dumpster is removed by a licensed hauler. No waste was deemed to present a hazard to product.