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## **HACCP & PC Manual**

Prepared by: Stephen Maduri (SQF Practitioner, PCQI)

& Edward Wellmeyer (Food Safety Expert Consultant)

Approved by:\_\_\_\_\_ Laura Katleman (President, CEO)

Date: 4/4/2022

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## **2022 HACCP/ Preventive Controls Validation**

The following products have been reviewed:

Organic Bites & Bars

Organic Cookies

Organic Cookie Dough in Jar and Tubes

Organic Granola/Cereal

Keto Chocolate Chips

Team Members	Date

DOCUMENT NAME Team Roster	<b>ISSUE DATE</b> 4/4/2022	<b>PAGE</b> 5 of 58
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# HACCP & PREVENTIVE CONTROLS TEAM - 2022

NAME	DEPARTMENT	ROLE	CERT
STEPHEN MADURI	QUALITY ASSURANCE	ORGANIZER	YES
LAURA KATLEMAN	PRESIDENT/CEO	MEMBER	YES
CRISTIAN LOPEZ	PRODUCTION	MEMBER	NO
HECTOR RAMIREZ	PRODUCTION	MEMBER	NO
ALEX SOTO	WAREHOUSE	MEMBER	NO
PETE SHIPMAN	MAINTENANCE	MEMBER	NO
REID ELZEY	MAINTENANCE	MEMBER	NO
JAMIE COLLARO	HUMAN RESOURCES	MEMBER	NO

DOCUMENT NAME Company Overview	<b>ISSUE DATE</b> 4/4/2022	<b>PAGE</b> 6 of 58
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Bhu Foods is located in San Diego, CA and was founded by its President/CEO, Laura Katleman, in 2013. "Bhu" is a word from Sanskrit meaning "of the earth". The company of 45 employees has been at its current location, approximately 31,000 sq. ft, in Otay Mesa for almost two years. At the Otay Mesa plant, Bhu Foods can receive, process, and store both ingredients for processing and finished goods for distribution.

Before starting Bhu, Laura had previously operated under the name Laura's Original Boston Brownies, Inc., producing and selling brownies in Boston. The mission of Bhu Foods is to make people's lives happier and healthier by helping them transition away from sugar. Over the years, Laura and her team have formulated a wide array of 100% organic vegan low-sugar products: bars, bites, granola, spreads in jars, and chocolate chips. Currently, the company is not producing any private-label products. Its line of truffles (double dark, peanut butter, hazelnut, and mint) is outsourced to a co-packer, Crown Chocolate, located in Salt Lake City, UT.

The company is founded on five principles, called "Bhu Bones"—breaking the mold, going above and beyond, embracing change, putting people before profits, and celebrating our successes. Bhu Foods is committed to consistently meeting and exceeding customer standards, FDA Preventive Control regulations, Global Food Safety Initiative (GFSI), and Safe Quality Food (SQF) standards by never compromising our own high food quality and safety expectations. All our team members must understand their responsibilities as the first line of food defense and be given the necessary resources to protect both our products and customers. Bhu Foods aspires to be a household brand name on both product quality and the strength of our food safety programs.

<b>DOCUMENT NAME</b> Prerequisite Programs	<b>ISSUE DATE</b> 4/4/2022	<b>PAGE</b> 7 of 58
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#### **Prerequisite Programs**

- 1. Good Manufacturing/Good Hygiene Practices
- 2. Sanitation
- 3. Pest Prevention
- 4. Food Chain Management
- 5. Recall/Traceability
- 6. Allergen
- 7. Environmental Pathogenic Monitoring
- 8. Maintenance
- 9. Plant and Grounds
- 10. Water and Utilities
- 11. Equipment and Utensils
- 12. Storage and Shipping
- 13.Training
- 14.Inspections
- 15.Labeling/Packaging
- **16.Code Dating and Lot Identification**

DOCUMENT NAME Finished Product Descriptions (Bars/Bites)	<b>ISSUE DATE</b> 4/4/2022	<b>PAGE</b> 8 of 58
PLANT NAME/ ADDRESS Otay Mesa 2735 Cactus Road San Diego 92154	<b>SUPERSEDES</b> 1/25/2022	REVIEWED & UPDATED BY:

PRODUCT NAME(S):	8 Fit Bars (a.k.a "Shelf Stable"): Apple Cinnamon Nutmeg, Dark Chocolate Coconut Almond, Double Dark Chocolate Chip, Peanut Butter Chocolate Chip, Peanut Butter White Chocolate, Salted Caramel Pecan, Snickerdoodle, Chocolate Chip.  11 Keto Bars: Caramel Peanut Chocolate Chip, Chocolate Chip, Chocolate Coconut Cookie, Chocolate Mint Cookie, Double Dark Chocolate, Peanut Butter Chocolate Chip, Snickerdoodle, White Chocolate Macadamia, PB & J, Hazelnut, Strawberry Cheesecake.  5 Keto Bites: Chocolate Chip Cookie, Chocolate Mint, Double Dark Chocolate Chip, Peanut Butter Chocolate Chip, White Chocolate Macadamia.
PRODUCT PROPERTIES: (Aw, pH, salt, preservatives, etc.)	<0.70 Aw, contains salt, no preservatives and certified organic
INGREDIENTS (Where is the information available concerning sources, specs & i.d of allergens of potential contaminants?)	See Product List: Current Ingredient Statements Tab
HOW IS IT TO BE USED? (ready-to-eat, cooked, heat & serve)	ready-to-eat
TYPE OF PACKAGING	polypropylene film wrappers
LABELING INFORMATION (Does it include date code, use and storage directions, and ingredients listing that addresses allergens?)	Includes date code, expiration date, allergen: cashew, coconut, peanut, almond, pecan, macadamia nut
SHELF LIFE & STORAGE CONDITIONS	24 month shelf life, ambient storage
WHERE WILL IT BE SOLD?	grocery stores, e-commerce, wholesalers
SPECIAL DISTRIBUTION CONTROL	none, recommend refrigeration for best quality of keto bars/bites
INTENDED CONSUMERS (Are sensitive populations included, i.e. elderly, infants, immunocompromised consumers?)	all ages

DOCUMENT NAME Finished Product Descriptions & Intended Distribution (Cookies)	<b>ISSUE DATE</b> 4/4/2022	<b>PAGE</b> 9 of 58
PLANT NAME/ ADDRESS Otay Mesa 2735 Cactus Road San Diego 92154	<b>SUPERSEDES</b> 1/25/2022	REVIEWED & UPDATED BY:

PRODUCT NAME(S):	<b>2 Fit Cookies:</b> Chocolate Chip Protein Cookie, Double Dark Chocolate Protein Cookie
PRODUCT PROPERTIES: (Aw, pH, salt, preservatives, etc.)	<0.70 Aw, contains salt, no preservatives and certified organic
INGREDIENTS (Where is the information available concerning sources, specs & i.d of allergens of potential contaminants?)	See Product List: Current Ingredient Statements Tab
HOW IS IT TO BE USED? (ready-to-eat, cooked, heat & serve)	ready-to-eat
TYPE OF PACKAGING	polypropylene film wrappers
LABELING INFORMATION (Does it include date code, use and storage directions, and ingredients listing that addresses allergens?)	Includes date code, expiration date, allergen: cashew
SHELF LIFE & STORAGE CONDITIONS	18 month shelf life, ambient storage
WHERE WILL IT BE SOLD?	grocery stores, e-commerce, wholesalers
SPECIAL DISTRIBUTION CONTROL	none
INTENDED CONSUMERS (Are sensitive populations included, i.e. elderly, infants, immunocompromised consumers?)	all ages

DOCUMENT NAME Finished Product Descriptions & Intended Distribution (Jars/Tubes)	<b>ISSUE DATE</b> 4/4/2022	<b>PAGE</b> 10 of 58
PLANT NAME/ ADDRESS Otay Mesa 2735 Cactus Road San Diego 92154	<b>SUPERSEDES</b> 1/25/2022	REVIEWED & UPDATED BY:

PRODUCT NAME(S):	7 Keto Jars: Chocolate Chip Cookie Dough Jar, Chocolate Coconut Cookie Dough Jar, Double Dark Chocolate Cookie Dough Jar, Peanut Butter Chocolate Chip Cookie Dough Jar, Birthday Cake Jar, Cookie Butter Spread, Chocolate Hazelnut Spread 2 Alkaline Jars: Cookie Dough Jar, Strawberry Cheesecake Jar Bakeable Keto Cookie Dough (Tube): Chocolate Chip Cookie Dough
PRODUCT PROPERTIES: (Aw, pH, salt, preservatives, etc.)	<0.70 Aw, contains salt, no preservatives and certified organic
INGREDIENTS (Where is the information available concerning sources, specs & i.d of allergens of potential contaminants?)	See Product List: Current Ingredient Statements Tab
HOW IS IT TO BE USED? (ready-to-eat, cooked, heat & serve)	ready-to-eat
TYPE OF PACKAGING	Food grade jars
LABELING INFORMATION (Does it include date code, use and storage directions, and ingredients listing that addresses allergens?)	Includes date code, expiration date, allergen: cashew, coconut, hazelnut, peanut
SHELF LIFE & STORAGE CONDITIONS	18 month shelf life, ambient storage
WHERE WILL IT BE SOLD?	grocery stores, e-commerce, wholesalers
SPECIAL DISTRIBUTION CONTROL	none, recommend refrigeration for best quality
INTENDED CONSUMERS (Are sensitive populations included, i.e. elderly, infants, immunocompromised consumers?)	all ages

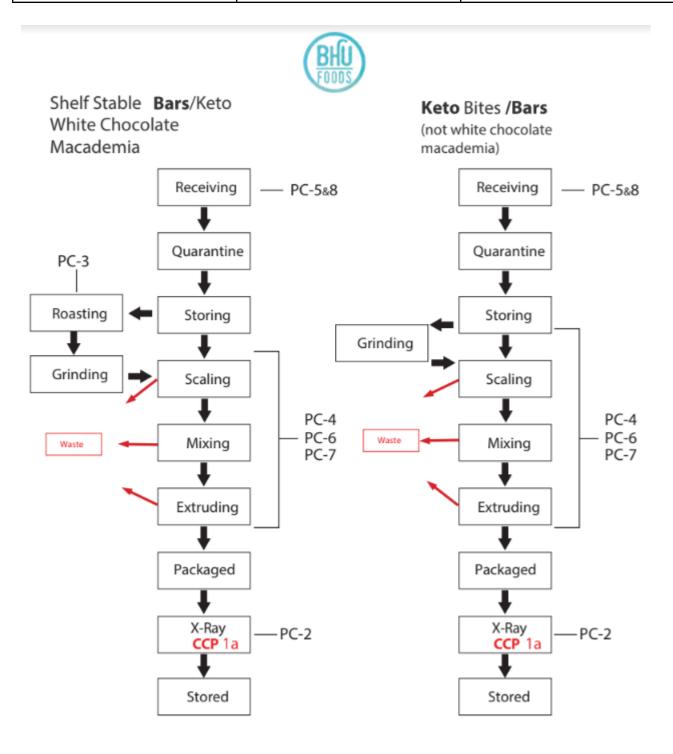
DOCUMENT NAME Finished Product Descriptions & Intended Distribution (Granola)	<b>ISSUE DATE</b> 4/4/2022	<b>PAGE</b> 11 of 58
PLANT NAME/ ADDRESS Otay Mesa 2735 Cactus Road San Diego 92154	<b>SUPERSEDES</b> 1/25/2022	REVIEWED & UPDATED BY:

PRODUCT NAME(S):	<b>3 Fit Protein Granolas:</b> Protein Granola, Chocolate Protein Granola, Cinnamon Protein Granola
PRODUCT PROPERTIES: (Aw, pH, salt, preservatives, etc.)	<0.70 Aw, contains salt, no preservatives and certified organic
INGREDIENTS (Where is the information available concerning sources, specs & i.d of allergens of potential contaminants?)	See Product List: Current Ingredient Statements Tab
HOW IS IT TO BE USED? (ready-to-eat, cooked, heat & serve)	ready-to-eat
TYPE OF PACKAGING	polypropylene film wrappers
LABELING INFORMATION (Does it include date code, use and storage directions, and ingredients listing that addresses allergens?)	Includes date code, expiration date, allergen: coconut
SHELF LIFE & STORAGE CONDITIONS	12 month shelf life, ambient storage
WHERE WILL IT BE SOLD?	grocery stores, e-commerce, wholesalers
SPECIAL DISTRIBUTION CONTROL	none
INTENDED CONSUMERS (Are sensitive populations included, i.e. elderly, infants, immunocompromised consumers?)	all ages

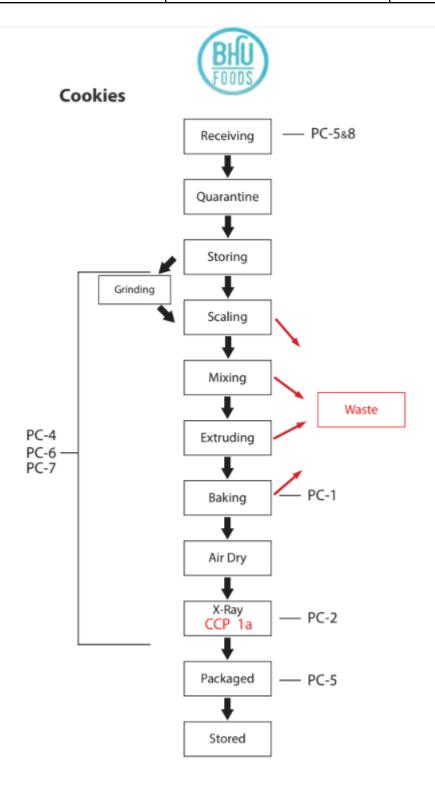
DOCUMENT NAME Finished Product Descriptions & Intended Distribution (Chocolate Chips)	<b>ISSUE DATE</b> 4/4/2022	<b>PAGE</b> 12 of 58
PLANT NAME/ ADDRESS Otay Mesa 2735 Cactus Road San Diego 92154	<b>SUPERSEDES</b> 1/25/2022	REVIEWED & UPDATED BY:

PRODUCT NAME(S):	Keto Chocolate Chips
PRODUCT PROPERTIES: (Aw, pH, salt, preservatives, etc.)	<0.70 Aw, contains salt, no preservatives and certified organic.
INGREDIENTS (Where is the information available concerning sources, specs & i.d of allergens of potential contaminants?)	See Product List: Current Ingredient Statements Tab
HOW IS IT TO BE USED? (ready-to-eat, cooked, heat & serve)	ready-to-eat
TYPE OF PACKAGING	polypropylene film pouches
LABELING INFORMATION (Does it include date code, use and storage directions, and ingredients listing that addresses allergens?)	Includes date code, expiration date, allergen: none
SHELF LIFE & STORAGE CONDITIONS	24 month shelf life, ambient storage
WHERE WILL IT BE SOLD?	grocery stores, e-commerce, wholesalers
SPECIAL DISTRIBUTION CONTROL	None, recommend refrigeration for best quality
INTENDED CONSUMERS (Are sensitive populations included, i.e. elderly, infants, immunocompromised consumers?)	all ages

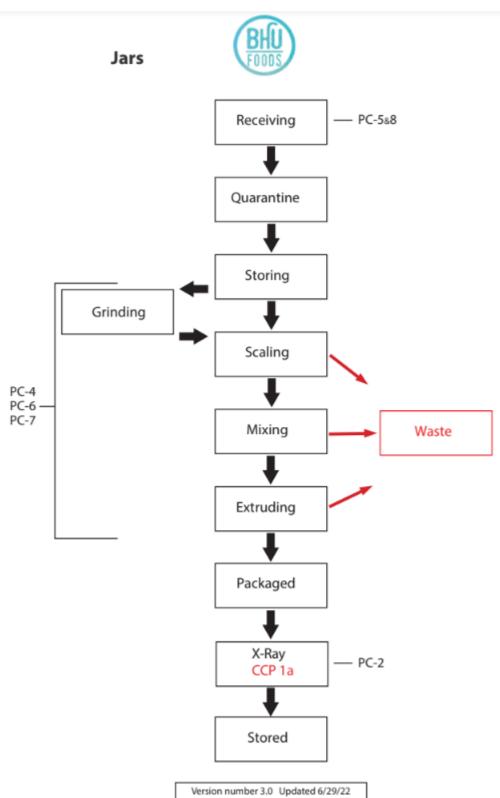
DOCUMENT NAME Flow Chart (Fit Bars/Keto Bars/Bites)	<b>ISSUE DATE</b> 6/29/2022	<b>PAGE</b> 13 of 58
PLANT NAME/ ADDRESS Otay Mesa 2735 Cactus Road San Diego 92154	<b>SUPERSEDES</b> 4/4/2022	REVIEWED & UPDATED BY:



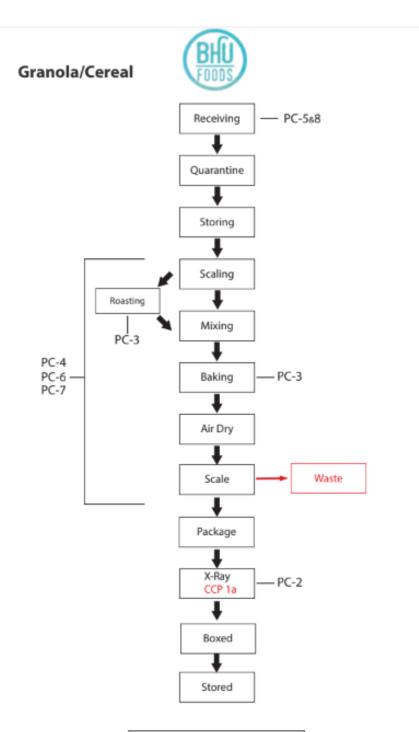
DOCUMENT NAME Flow Chart (Cookies)	<b>ISSUE DATE</b> 6/29/2022	<b>PAGE</b> 14 of 58
PLANT NAME/ ADDRESS Otay Mesa 2735 Cactus Road San Diego 92154	<b>SUPERSEDES</b> 4/4/2022	REVIEWED & UPDATED BY:



<b>DOCUMENT NAME</b> Flow Chart (Jars & Tubes)	<b>ISSUE DATE</b> 6/29/2022	<b>PAGE</b> 15 of 58
PLANT NAME/ ADDRESS Otay Mesa 2735 Cactus Road San Diego 92154	<b>SUPERSEDES</b> 4/4/2022	REVIEWED & UPDATED BY:

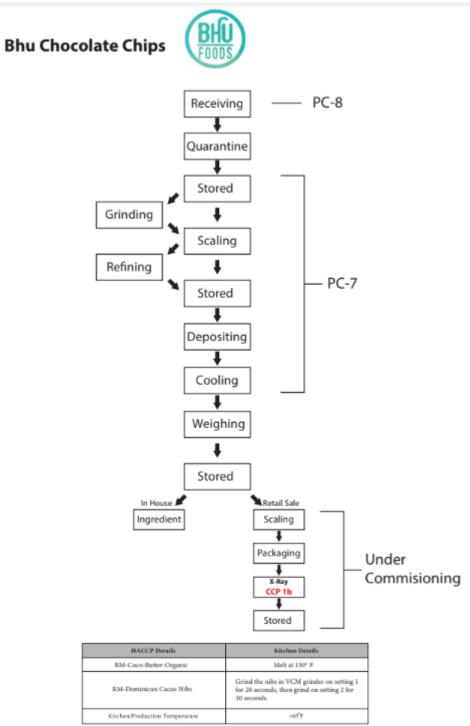


<b>DOCUMENT NAME</b> Flow Chart (Granola)	<b>ISSUE DATE</b> 6/29/2022	<b>PAGE</b> 16 of 58
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Version number 3.0 Updated 6/29/22 Flow Chart Granola/Cereal

DOCUMENT NAME Flow Chart (Chocolate Chips)	<b>ISSUE DATE</b> 6/29/2022	<b>PAGE</b> 17 of 58
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Version number 3.0	Updated 6/29/22
Flow Chart Fit Bars/K	oto Bars/Ritos

DOCUMENT NAME Process Narrative (Description of Operations)	<b>ISSUE DATE</b> 4/4/2022	<b>PAGE</b> 18 of 58
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#### **Description of Operations**

- Approved supplier packaging and ingredients are received and inspected, then stored into a designated location in the
  warehouse. To avoid cross contamination, the ingredients containing allergens are stored separately and labeled according
  to the specific allergen throughout the process: almonds, cashews, coconut, hazelnuts, macadamia nuts, peanuts and
  pecans. All ingredients must be certified organic or organic-compliant (baking soda, fibergel, sea salt, and xanthan gum).
- 2. Upon receiving, certificates of analysis are compared to material specifications for compliance. Prior to purchase, packaging suppliers will provide a letter of material conformance to 21 CFR 177/178. Ingredient and package materials which do not meet specifications are quarantined in the quality assurance hold area. The purchasing department informs the approved supplier of the nonconforming product. Disposition will be determined by quality assurance, senior management, and the supplier.
- 3. Ingredient and packaging materials are removed from storage inventories per the recipe formula of the product by either a production supervisor or designated employee. Ingredients are transported to the mixing area through either the supplier's provided bags or a color-coded and labeled container. Packaging materials are transported to the packaging equipment by the warehouse or production supervisor. The production supervisor will verify that the correct package material is being used for the scheduled production runs.
- 4. The ingredients are mixed with the Hobart equipment by trained mixing operators, per the recipe formula weighted by trained scalers using calibrated scales. Some ingredients are stored at the mixing area in proper color coded containers. Any mixing of allergen ingredients will use the appropriate color coded container and scoop.
- 5. The mixed batch of ingredients will be placed in stainless steel carts cleaned and sanitized with approved chemicals and moved to the cooler for cooldown if necessary. The cooling is strictly for best quality and not a food safety concern. Due to the low water activity of all of Bhu Foods products (<0.65) the products are classified by the FDA Food Code 2017 as non potentially hazardous food.
- 6. For bars/bites/jar/cookies, the carts with mixed product will be lifted to the Vemag forming hopper. For granola, the mix is baked
- 7. The product is formed into bars/bites/cookies or filled into plastic jars, per the correct weight specifications.
- 8. The bars/bites/cookies are wrapped in the designated packaging material and heat sealed. The plastic jars are also heat sealed with a polystyrene liner before placing the polypropylene cap. The designated packaging material will have the day of production printed on it prior to use in production. The Julian lot code is used to distinguish different production runs.
- 9. The bites (6 units of 25g each) and granola (340g total) are filled into bags. The bars (8 keto units of 45g each, 12 fit units of 45g each) are filled into caddy boxes. The cookies (10 units of 47g each) are also filled into a dedicated caddy box.
- 10. All the packaged finished goods are passed through the Mekitec x-ray equipment to evaluate and detect for any extraneous metal. The x-ray unit is inspected at least every two hours with three standards: 2.0mm ferrous, non-ferrous, and stainless steel by a trained employee. The x-ray unit can also detect the density ratio contrast of other non-metal objects such as plastic and glass.
- 11. The completed bags/caddy boxes/ jars are placed into master box cartons, which are then sealed with tape and placed onto a pallet, according to the build specifications.
- 12. The pallet is moved to the warehouse for fulfillment, either e-trade direct to customer through FedEx/UPS/USPS or wholesale distribution throughout a partner network.

DOCUMENT NAME Process Narrative (Chocolate Processing, Sanitation, Employee Training and Education)	ISSUE DATE 4/4/2022	<b>PAGE</b> 19 of 58
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#### **Chocolate Processing**

- 1. The dark chocolate is mixed to formula, using the McIntyre refiner conche, under warm conditions. The dark chocolate product is pumped from the chip tank to the tempering tank. The products are maintained under warm conditions to avoid solidification.
- 2. The products are pumped to the enrobed and to the chip depositor, two separate dedicated lines for each function. The chocolate chips and enrobed products go through cooling tunnels. There is an inline magnet in the chocolate system.
- 3. The chocolate chips will be packaged into 10-20lb plastic lined boxes for in-house processing. The enrobed bars will be packaged and sent through an x-ray unit before being stored for distribution. The packaged units are filled into the proper labeled box and master case, palletized, and transported to either the cooler or warehouse.
- 4. The distribution is sent to customers or, in the case of the chocolate chips, used in the formulation.

#### Sanitation

- 1. The equipment for bar and jar production is cleaned with an alkali detergent (4oz/gallon in hot warm > 110 degrees F).
- 2. After cleaning, the equipment is sanitized with hypochlorite (bleach) 175-200ppm or peracetic acid.
- 3. The hypochlorite sanitizer will be washed off with tap water before dry-drying and being released back for use in production to comply with organic regulations.
- 4. The cleaning is manually done by trained employees with a colored sanitation bucket and appropriate cleaning utensils.
- 5. The McIntyre refiner/conche is not cleaned but maintained with cocoa butter circulated continuously with a temperature over 90 degrees F.
- 6. The chip depositor, the processing step just prior to the cooling tunnel, is removed, disassembled, and alkali cleaned in the production washroom. No sanitizer is necessary.

#### **Education and Training of Employees**

- 1. Employees are given GMP/GHP, allergen, food defense, food safety education and training on the first day of employment, at least annually, or as needed during the company's mid-day meetings.
- Designated employees will be provided specialty training to monitor HACCP, CCP, Preventive Controls, Sanitation and Temperature Controls.

DOCUMENT NAME Hazard Analysis (Bars & Bites)	<b>ISSUE DATE</b> 4/4/2022	<b>PAGE</b> 20 of 58
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Hazard Analysis for: Bars & Bites										
(1) Ingredient / Processing Step	food enha E ( (inclu	lentify potential I safety hazards introduced, controlled or nced at this step B = biological C = chemical ding radiological) P = physical	(3) Do <u>potenti</u> safety ł requ preventivo	<u>al</u> food nazards ire a	(4) Justify your decision for column 3	(5) What preventive control measure(s) can be applied to significantly minimize or prevent the food safety hazard?  Process including CCPs, Allergen, Sanitation, Supply-chain, other preventive control	(6) Is preventive control applied at this step?			
			Yes	No			Yes	No		
Receiving and storing ingredients/packaging	В	Salmonella	$\checkmark$		COA verification for processed nuts and seeds	Supply-chain program (PC-8)	V			
	С	Peanut/Tree Nut	V		Packaging must be confirmed to ensure no printing or other manufacturing errors.	Label approval from authorized staff (PC-5);	$\searrow$			
	Р	Contaminants		V	GMP: Employee training and receiving SOP			$\checkmark$		
Sanitation	В	Salmonella	V		Verify current SSOPs are effective in the removal of potential pathogens.	Verification of the cleaning program (PC-6); validation of the cleaning program (PC-7);	$\searrow$			
	С	Peanut/tree nut		V	Verify that allergen protein residue is not present.	Monthly allergen wash verification (PC-4)		$\checkmark$		
	Р	Contaminants		$\checkmark$	GMP: Sanitation			$\checkmark$		
Roasting of raw nuts and seeds [Only shelf stable bars / keto	В	Salmonella	✓		On-site processing required for raw ingredients	Process control (PC-3)	<b>V</b>			
white choc)	С	Macadamia Nut and pecan only		V	GMP: Employee training and SOPs			$\checkmark$		
	Р	N/A		V	GMP: Employee training and SOPs			✓		
Grinding of nuts into butter	В	N/A		✓	GMP: Sanitation			<b>✓</b>		

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Hazard Analysis (Bars & Bites)	4/4/2022	21 of 58
PLANT NAME/ ADDRESS Otay Mesa 2735 Cactus Road San Diego 92154	<b>SUPERSEDES</b> 1/25/2022	REVIEWED & UPDATED BY:

	_							
	С	Peanut/Tree Nut		<b>V</b>	GMP: Color coding to prevent cross-contamination between allergens.			V
	Р	N/A		$\checkmark$	GMP: Employee training and grinding SOP			<b>✓</b>
Scaling	В	N/A		V	GMP & processed after roasting			$\checkmark$
	С	Peanut/Tree Nut		$\checkmark$	GMP: Allergen program			<b>V</b>
	Р	N/A		V	GMP: Employee training and scaling SOP			Y
Mixing	В	N/A		V	GMP: Employee training and mixing SOP			V
	С	Peanut/Tree Nut		V	GMP: Allergen program			V
	Р	N/A		V	GMP: Employee training and mixing SOP			$\checkmark$
Extruding	В	N/A		V	GMP: Employee training and SOP			V
	С	Peanuts/Tree Nuts		V	GMP: Allergen cleaning program			$\checkmark$
	Р	N/A		$\checkmark$	GMP: Employee training and SOP			
Wrapping	В	N/A		V	GMP: Employee training and SOP			V
	С	N/A		$\checkmark$	GMP: Employee training and SOP			
	Р	N/A		V	GMP: Employee training and SOP			V
Packaging	В	None		$\checkmark$	GMP: Employee training and SOP			V
	С	None		V	GMP: Employee training and SOP			V
	Р	None	$\searrow$		End of processing x- to detect three metal standards@ 2.0mm	Process control (PC-2, CCP-1)	Ŋ	
Fulfillment	В	None		$\checkmark$	GMP: Employee training and SOP			V
	С	None		$\checkmark$	GMP: Employee training and SOP			$\checkmark$
	Р	None			GMP: Employee training and SOP			$\checkmark$

<b>DOCUMENT NAME</b> Hazard Analysis (Cookies)	<b>ISSUE DATE</b> 4/4/2022	<b>PAGE</b> 22 of 58
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Hazard Analysis for: Cookies										
(1) Ingredient / Processing Step	(2) Identify potential food safety hazards introduced, controlled or enhanced at this step  B = biological C = chemical (including radiological) P = physical		(3) Do any potential food safety hazards require a preventive control?		(4) Justify your decision for column 3	(5) What preventive control measure(s) can be applied to significantly minimize or prevent the food safety hazard?  Process including CCPs, Allergen, Sanitation, Supply-chain, other preventive control	(6) Is the preventive control applied at this step?			
			Yes	No			Yes	No		
Receiving and storing ingredients/packaging	В	Salmonella	$\checkmark$		COA verification for processed nuts and seeds	Supply-chain program (PC-8)	✓			
	С	Allergen	$\searrow$		Packaging must be confirmed to ensure no printing or other manufacturing errors.	Label approval from authorized staff (PC-5);	$\searrow$			
	Р	Contaminants		<b>✓</b>	GMP: Employee training and receiving SOP			<b>V</b>		
Sanitation	В	Salmonella			Food pathogens could survive the cleaning process and contaminate the production flow line. Therefore, it must be determined if the cleaning detergents and sanitizers along with current SSOPs are effective in the removal of potential pathogens.	Verification of the cleaning program (PC-6); validation of the cleaning program (PC-7);	$\supset$			
	С	Peanut/tree nut		V	Ensure that SSOP is being followed correctly.	Monthly allergen wash verification (PC-4)	N			
	Р	N/A		V	GMP: Sanitation			$\checkmark$		
Baking of raw macadamia nuts and pecans	В	Salmonella	$\checkmark$		GMP: Employee training and SOP	Process Control (PC-3)	<b>✓</b>			
pecano	С			$\checkmark$	GMP: Employee training and SOP			$\checkmark$		
	Р			V	GMP: Employee training and SOP			$\checkmark$		

DOCUMENT NAME Hazard Analysis (Cookies)	<b>ISSUE DATE</b> 4/4/2022	<b>PAGE</b> 23 of 58
PLANT NAME/ ADDRESS Otay Mesa 2735 Cactus Road San Diego 92154	<b>SUPERSEDES</b> 1/25/2022	REVIEWED & UPDATED BY: Stylen & Mooden

Grinding	В	N/A		$\vee$	GMP: Sanitation			<b>V</b>
	С	Peanut/Tree Nut		V	GMP: Color coding system			V
	Р	N/A		V	GMP: Employee training and grinding SOP			V
Scaling	В	N/A		V	GMP: Employee training and scaling SOP			V
	С	N/A			GMP: Allergen program			V
	Р	N/A		V	GMP: Employee training and scaling SOP			V
Mixing	В	N/A		V	GMP: Employee training and mixing SOP			V
	С	N/A		V	GMP: Allergen program			V
	Р	N/A		✓	GMP: Employee training and mixing SOP			V
Extruding	В	N/A		$\vee$	GMP: Employee training			V
	С	N/A		$\vee$	GMP: Allergen program			V
	Р	N/A		$\vee$	GGMP: Employee training			V
Baking of cookies	В	Salmonella	✓		Critical Limit	Process Control (PC-1)	V	
	С	N/A		V	GMP: Allergen program			V
	Р	N/A		V	GMP: Employee training and baking SOP			V
Wrapping	В	N/A		V	GMP: Employee training			V
	С	N/A		V	GMP: Employee training			V
	Р	N/A		V	GMP: Employee training			V
X-ray Unit	В	N/A		✓	GMP: Employee training			V
	С			$\checkmark$	GMP: Employee training			V

DOCUMENT NAME Hazard Analysis (Cookies)				<b>ISSUE DATE</b> 4/4/2022		<b>PAGE</b> 24 of 58			
PLANT NAME/ ADDRESS Otay Mesa 2735 Cactus Road San Diego 92154			<b>SUPERSEDES</b> 1/25/2022			REVIEWED & UPDATED BY:			
	Р	Extraneous Metal	K		Final check to prevent extraneous metal (stainles: ferrous, non-ferrous) in product	X-Ray Metal Detector (PC-2, CCP-1)	<b>V</b>		
Packaging	В			V	GMP: Employee training			<b>✓</b>	
	С			V	GMP: Employee training			<b>V</b>	
	Р			V	GMP: Employee training			~	
Storage/Fulfillment/Sh ipping	В			V	GMP: Employee training			$\checkmark$	
	С	_		$\checkmark$	GMP: Employee training				

GMP: Employee training

 $\checkmark$ 

Р

<b>DOCUMENT NAME</b> Hazard Analysis (Jars/Tubes)	ISSUE DATE 4/4/2022	<b>PAGE</b> 25 of 58
PLANT NAME/ ADDRESS Otay Mesa 2735 Cactus Road San Diego 92154	<b>SUPERSEDES</b> 1/25/2022	REVIEWED & UPDATED BY:

Hazard Anal	ysis	for: Jars/Tube	es					
(1) Ingredient / Processing Step (2) Identify potential food safety hazards introduced, controlled or enhanced at this step  B = biological C = chemical (including		otential food afety hazards introduced, controlled or hanced at this step  3 = biological C = chemical	(3) Do any <u>potential</u> food safety hazards require a preventive control?		(4) Justify your decision for column 3	(5) What preventive control measure(s) can be applied to significantly minimize or prevent the food safety hazard?  Process including CCPs, Allergen, Sanitation, Supply-chain, other preventive control	control	preventive applied at step?
		P = physical	Yes	No			Yes	No
Receiving and storing ingredients/	В	Salmonella	$\checkmark$		COA verification for processed nuts and seeds	Supply-chain program (PC-8)	\	
packaging	С	Allergen listing	<b>V</b>		Verify no printing errors in packaging.	Label approval from authorized staff (PC-5);	V	
	Р	Contaminants		$\triangleright$	GMP: Employee training and receiving SOP			
Sanitation	В	Salmonella	V		Verify effectiveness in the removal of potential pathogens.	Verification (PC-6); validation of the cleaning program (PC-7);	$\searrow$	
	С	Peanut/tree nut	V		Verify that no allergen residue remains.	Monthly allergen wash verification (PC-4)	V	
	Р	Contaminants		$\checkmark$	GMP: Sanitation			$\checkmark$
Grinding of nuts into butter	В	N/A		V	GMP: Employee training and grinding SOP			$\checkmark$
	С	Peanut/Tree Nut		V	GMP: Employee training and grinding SOP			$\checkmark$
	Р	N/A		$\triangleright$	GMP: Employee training and grinding SOP			<b>V</b>
Scaling	В	N/A		<b>~</b>	Processed after roasting			$\checkmark$

DOCUMENT NAME	<b>ISSUE DATE</b>	<b>PAGE</b>
Hazard Analysis (Jars/Tubes)	4/4/2022	26 of 58
PLANT NAME/ ADDRESS Otay Mesa 2735 Cactus Road San Diego 92154	<b>SUPERSEDES</b> 1/25/2022	REVIEWED & UPDATED BY: Styler & Moodel

			_					
	С	N/A		V	GMP: Employee training and scaling SOP			V
	Р	N/A		$\checkmark$	GMP: Employee training and scaling SOP			V
Mixing	В	N/A		V	GMP: Employee training and mixing SOP			V
	С	N/A		<b>\</b>	GMP: Employee training and mixing SOP			$\triangleright$
	Р	N/A		<b>∀</b>	GMP: Employee training and mixing SOP			$\triangleright$
Extruding	В	N/A		$\checkmark$	GMP: Employee training			V
	С	N/A		$\checkmark$	GMP: Employee training			V
	Р	N/A		V	GMP: Employee training			✓
Wrapping	В	N/A		<b>V</b>	GMP: Employee training			<b>✓</b>
	С	N/A		V	GMP: Employee training			<b>✓</b>
	Р	N/A		$\checkmark$	GMP: Employee training			<b>✓</b>
Packaging	В	None		~	GMP: Employee training			Y
	С	None		$\checkmark$	GMP: Employee training			N
	Р	Extraneous Metal	$\checkmark$		End of processing	Process control (PC-2, CCP-1)	<b>&gt;</b>	
Storage/Fulfillme nt / Shipping	В	None		V	GMP: Employee training			V
	С	None		✓	GMP: Employee training			V
	Р	None			GMP: Employee training			Y

<b>DOCUMENT NAME</b> Hazard Analysis (Granola)	<b>ISSUE DATE</b> 4/4/2022	<b>PAGE</b> 27 of 58
PLANT NAME/ ADDRESS Otay Mesa 2735 Cactus Road San Diego 92154	<b>SUPERSEDES</b> 1/25/2022	REVIEWED & UPDATED BY:

Hazard Analysis	for:	Granola						
(1) Ingredient / Processing Step	po sa i c enh B	(2) Identify otential food fety hazards ntroduced, ontrolled or nanced at this step  3 = biological C = chemical (including radiological) D = physical	(3) Do potenti safety h requ preve cont	<u>al</u> food azards ire a ntive	(4) Justify your decision for column 3	(5) What preventive control measure(s) can be applied to significantly minimize or prevent the food safety hazard?  Process including CCPs, Allergen, Sanitation, Supply-chain, other preventive control	(6) Is the preventive control applied at this step?	
			Yes	No			Yes	No
Receiving and storing ingredients and	В	Salmonella	V		COA verification for processed nuts and seeds	Supply-chain program (PC-8)	V	
packaging	С	Allergen listing	$\searrow$		Verify no printing errors in packaging.	Label approval from authorized staff (PC-5);	V	
	Р	Contaminants		V	GMP: Employee training and receiving SOP			$\checkmark$
Sanitation	В	Salmonella	$\searrow$		Verify effectiveness in the removal of potential pathogens.	Verification (PC-6); validation of the cleaning program (PC-7);	N	
	С	Peanut/tree nut	V		Verify that no allergen residue remains.	Monthly allergen wash verification (PC-4)	K	
	Р	Contaminants		V	GMP: Sanitation			$\checkmark$
Roasting of raw seeds	В	Salmonella			On-site processing required for raw ingredients	Process control (PC-3)	N	
	С	N/A		\	GMP: Employee training			$\checkmark$
	Р	N/A		V	GMP: Employee training and SOP			$\checkmark$
Grinding of seeds	В	N/A		V	GMP: Employee training and grinding SOP			$\checkmark$
	С	Peanut/tree nut		N	GMP: Employee training and grinding SOP			$\checkmark$
	Р	N/A		V	GMP: Employee training and grinding SOP			$\checkmark$
Scaling	В	N/A		$\checkmark$	GMP: Employee training and			$\checkmark$

DOCUMENT NAME Hazard Analysis (Granola)	<b>ISSUE DATE</b> 4/4/2022	<b>PAGE</b> 28 of 58
PLANT NAME/ ADDRESS Otay Mesa 2735 Cactus Road San Diego 92154	<b>SUPERSEDES</b> 1/25/2022	REVIEWED & UPDATED BY:

					scaling SOP			
	С	N/A		$\vee$	GMP: Employee training and scaling SOP			$\checkmark$
	Р	N/A		V	GMP: Employee training and scaling SOP			V
Mixing	В	N/A			GMP: Employee training and mixing SOP			V
	С	N/A		K	GMP: Employee training and mixing SOP			V
	Р	N/A		\	GMP: Employee training and mixing SOP			V
Extruding	В	N/A			GMP: Employee training			
	С	N/A			GMP: Employee training			
	Р	N/A			GMP: Employee training			
Wrapping	В	N/A		V	GMP: Employee training			V
	С	N/A		V	GMP: Employee training			V
	Р	N/A		$\searrow$	GMP: Employee training			V
X-ray Unit	В	N/A		$\checkmark$	GMP: Employee training			$\checkmark$
	С	N/A		\	GMP: Employee training			$\vee$
	Р	N/A	N		End of processing	PC-2 (CCP-1)	N	
Packaging	В	N/A			GMP: Employee training			V
	С	N/A			GMP: Employee training			V
	Р	N/A		V	GMP: Employee training			V
Storage/Fulfillmen t/ Shipping	В	N/A		$\checkmark$	GMP: Employee training			✓
., obu.ip	С	N/A		$\checkmark$	GMP: Employee training			V
	Р	N/A		V	GMP: Employee training			$\checkmark$

DOCUMENT NAME Hazard Analysis (Chocolate Chips)	<b>ISSUE DATE</b> 4/4/2022	<b>PAGE</b> 29 of 58
PLANT NAME/ ADDRESS Otay Mesa 2735 Cactus Road San Diego 92154	<b>SUPERSEDES</b> 1/25/2022	REVIEWED & UPDATED BY:

Hazard Analysis fo	r: Cho	ocolate Chips						
(1) Ingredient / Processing Step  (2) Identify potential food safety hazards introduced, controlled or enhanced at this step  B = biological C = chemical (including radiological)		(3) Do <u>potentia</u> safety h requi preve cont	al food azards ire a ntive	(4) Justify your decision for column 3	(5) What preventive control measure(s) can be applied to significantly minimize or prevent the food safety hazard?  Process including CCPs, Allergen, Sanitation, Supply-chain, other preventive control	control a	preventive oplied at this tep?	
	P	e physical	Yes	No			Yes	No
Receiving and storing ingredients and	В	Salmonella	V		Verify COAs	Supply-chain program (PC-8)	$\searrow$	
packaging	С	N/A		<b>✓</b>	GMP: Employee training			$\checkmark$
	Р	Contaminants		<b>✓</b>	GMP: Employee training			<b>V</b>
Sanitation	В	Salmonella	$\vee$		Verify effectiveness.	Verification (PC-6); validation of the cleaning program (PC-7);		
	С	Allergen	V		Verify no residue remains.	Monthly wash verification (PC-4)	<b>\</b>	
	Р	Contaminants		<b>✓</b>	GMP: Employee training			<b>V</b>
Grinding	В	N/A		<b>✓</b>	GMP: Employee training			<b>V</b>
	С	N/A		<b>✓</b>	GMP: Employee training			<b>V</b>
	Р	N/A		<b>✓</b>	GMP: Employee training			<b>V</b>
Scaling	В	N/A		<b>✓</b>	GMP: Employee training			
	С	N/A		<b>✓</b>	GMP: Employee training			$\checkmark$
	Р	N/A		<b>✓</b>	GMP: Employee training			$\checkmark$
Refining	В	N/A		<b>✓</b>	GMP: Employee training			
	С	N/A		<b>✓</b>	GMP: Employee training			$\checkmark$

DOCUMENT NAME Hazard Analysis (Chocolate Chips)  PLANT NAME/ ADDRESS Otay Mesa 2735 Cactus Road San Diego 92154					<b>JE DATE</b> 4/2022	PAGE 30 of 58  REVIEWED & UPDATED BY:  State of Models		
					ERSEDES 25/2022			
	Р	N/A			GMP: Employee training			✓
Storage	В	N/A			GMP: Employee training			
	С	N/A		✓	GMP: Employee training			✓
	Р	N/A		$\checkmark$	GMP: Employee training			<b>V</b>
Depositing	В	N/A		$\checkmark$	GMP: Employee training			V
	С	N/A		<b>✓</b>	GMP: Employee training			V
	Р	N/A		$\checkmark$	GMP: Employee training			V
Cooling	В	N/A		$\checkmark$	GMP: Employee training			V
	С	N/A		$\checkmark$	GMP: Employee training			V
	Р	N/A		$\checkmark$	GMP: Employee training			V
Scaling and Bagging	В	N/A		$\checkmark$	GMP: Employee training			<b>\</b>
	С	N/A		<b>✓</b>	GMP: Employee training			<b>V</b>
	Р	N/A		$\checkmark$	GMP: Employee training			<b>V</b>
X-Ray Processing	В	N/A		$\checkmark$	GMP: Employee training			V
	С	N/A		$\checkmark$	GMP: Employee training			<b>V</b>
	Р	Metal	$\checkmark$		Final step of processing	PC2-CCP1		
Storage/Fulfillment / Shipping	В	N/A		$\checkmark$	GMP: Employee training			<b>V</b>
	С	N/A		$\checkmark$	GMP: Employee training			$\checkmark$

GMP: Employee training

 $\checkmark$ 

N/A

DOCUMENT NAME Hazard Analysis (Ingredients/Components)	<b>ISSUE DATE</b> 4/4/2022	<b>PAGE</b> 31 of 58			
PLANT NAME & ADDRESS Otay Mesa 2735 Cactus Road San Diego CA 92154	<b>SUPERSEDES</b> 1/25/2022	REVIEWED/UPDATED BY:			

Hazard Analysis for	Hazard Analysis for: Ingredients											
(1) Ingredient / Processing Step	(2) Identify potential food safety hazards introduced, controlled or enhanced at this step  B = biological C = chemical (including radiological) P = physical		(3) Do <u>potenti</u> safety ł requ preventivo	al food nazards ire a	(4) Justify your decision for column 3	(5) What preventive control measure(s) can be applied to significantly minimize or prevent the food safety hazard?  Process including CCPs, Allergen, Sanitation, Supply-chain, other preventive control	(6) Is the preventive control applied at this step?					
			Yes	No			Yes	No				
Almonds – Organic	В	Salmonella	V		Certificate of Analysis / GMP	Supply-chain program (PC-8)	V					
	С	Allergen		V	Spec Sheet/ GMP			V				
	Р	Foreign Objects		Y	Continuous Food Guarantee/ GMP			V				
Almonds Blanched	В	Salmonella	$\checkmark$		Certificate of Analysis / GMP	Supply-chain program (PC-8)	$\checkmark$					
	С	Allergen		V	Spec Sheet/ GMP			$\checkmark$				
	Р	Foreign Objects		Y	Continuous Food Guarantee/ GMP			V				
Almond Flour	В	Salmonella	V		Certificate of Analysis / GMP	Supply-chain program (PC-8)		$\checkmark$				
	С	Allergen		Y	Spec Sheet/ GMP			V				
	Р	Foreign Objects		V	Continuous Food Guarantee/ GMP			<b>V</b>				
Apple Dices – Organic Dehydrated	В	N/A		$\searrow$	Certificate of Analysis/Spec Sheet/ GMP			✓				
	С	N/A		V	Allergen Statement/ GMP			V				
	Р	Foreign Objects		V	Continuous Food Guarantee/ GMP			V				
Avocado Oil – Organic	В	N/A		V	Certificate of Analysis/Spec Sheet/ GMP			V				

DOCUMENT NAME  Hazard Analysis (Ingredients/Components)			<b>ISSUE DATE</b> 4/4/2022			<b>PAGE</b> 32 of 58					
PLANT NAME & ADDRESS Otay Mesa 2735 Cactus Road San Diego CA 92154					<b>RSEDES</b> /2022		REVIEWED/UPDATED BY:				
C N/A			☐ ☐ Allergen Statement/GN						✓		
	Р	Foreign Objects		N N	Continuous Food Guard				✓		
Baking Soda – Conventional	В	N/A		$\checkmark$	Certificate of Analysis, Sheet/GMP	/Spec			V		
	С	N/A		V	Allergen Statement/ GMP				$\checkmark$		
	Р	Foreign Objects		<b>▽</b>	Continuous Food Guarantee/ GMP				V		
Baobab – Organic	В	N/A		<b>✓</b>	Certificate of Analysis/Spec Sheet/ GMP				V		
	С	N/A		$\vee$	Allergen Statement/GMP				$\checkmark$		
	Р	Foreign Objects		<b>✓</b>	Continuous Food Guarantee/ GMP				V		
Cacao/Cocoa	В	N/A		<b>✓</b>	Certificate of Analysis, Sheet/GMP	/Spec			$\vee$		
	С	N/A		V	Allergen Statement/	GMP			$\checkmark$		
	Р	Foreign Objects		$\checkmark$	Continuous Food Guara GMP	antee/			V		
Cake Batter Flavor Powder	В	N/A		<b>✓</b>	Certificate of Analysis, Sheet/ GMP	/Spec			V		
	С	N/A		V	Allergen Statement/0	GMP			$\checkmark$		
	Р	Foreign Objects		<b>▽</b>	Continuous Food Guarantee/ GMP				V		
Caramel Cream Flavor Concentrate –	В	N/A			Certificate of Analysis, Sheet/GMP	/Spec			N.		
Organic	С	N/A		V	Allergen Statement/	GMP			<b>✓</b>		
	Р	Foreign Objects		V	Continuous Food Guarantee/ GMP				V		
Cashews – Organic	В	Salmonella	V		Certificate of Analysis, Sheet/ GMP	/Spec	Supply chain program (PC-8)	$\checkmark$			

DOCUMENT NAME Hazard Analysis (Ingredients/Components)			<b>ISSUE DATE</b> 4/4/2022			<b>PAGE</b> 33 of 58				
PLANT NAME & ADDRESS Otay Mesa 2735 Cactus Road San Diego CA 92154		<b>SUPERSEDES</b> 1/25/2022				REVIEWED/UPDATED BY:				
	С	Allergen		$\checkmark$	Spec Sheet/GMP	)				
	Р	Foreign Objects		<b>V</b>	Continuous Food Guara GMP	antee/			<b>✓</b>	
Cashew Pieces	В	Salmonella	N		Certificate of Analysis, Sheet/GMP	/Spec	Supply chain program (PC-8)	$\searrow$		
	С	Allergen			Spec Sheet/ GMF	)			$\checkmark$	
	Р	Foreign Objects		V	Continuous Food Guard	antee/			$\searrow$	
Cheesecake Flavor Concentrate	В	N/A		V	Certificate of Analysis/Spec Sheet/ GMP				V	
	С	N/A			Allergen Statement/GMP				V	
	Р	Foreign Objects		$\checkmark$	Continuous Food Guarantee/ GMP				K	
Chia Seeds Ground – Organic	В	N/A		<b>✓</b>	Certificate of Analysis, Sheet/GMP	/Spec			V	
	С	N/A		$\checkmark$	Allergen Statement/	GMP			$\vee$	
	Р	Foreign Objects		<b>✓</b>	Continuous Food Guara	antee/			V	
Chocolate – Organic	В	N/A		$\checkmark$	Certificate of Analysis, Sheet/ GMP	/Spec			V	
	С	N/A		$\checkmark$	Allergen Statement/0	GMP			$\vee$	
	Р	Foreign Objects		<b>V</b>	Continuous Food Guara	antee/			$\searrow$	
Cinnamon Powder – Organic	В	N/A		V	Certificate of Analysis, Sheet/GMP	/Spec			Y	
	С	N/A		V	Allergen Statement/	GMP			$\checkmark$	
	Р	Foreign Objects		V	Continuous Food Guara GMP	antee/			Y	
Cocoa Butter – Organic	В	N/A		V	Certificate of Analysis, Sheet/ GMP	/Spec			V	

DOCUMENT NAME  Hazard Analysis (Ingredients/Components)			<b>ISSUE DATE</b> 4/4/2022			<b>PAGE</b> 34 of 58					
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	С	N/A	П		Allergen Statement/0	GMP		П	✓		
	Р	Foreign Objects			Continuous Food Guard						
Coconut Butter	В	N/A		<b>✓</b>	Certificate of Analysis/Spec Sheet/ GMP				V		
	С	Allergen		$\vee$	Spec Sheet/GMP	,			$\checkmark$		
	Р	Foreign Objects		<b>✓</b>	Continuous Food Guarantee/GMP				$\checkmark$		
Cocoa Powder	В	N/A		<b>✓</b>	Certificate of Analysis/Spec Sheet/ GMP				$\vee$		
	С	N/A		V	Allergen Statement/0	GMP			$\checkmark$		
	Р	Foreign Objects		<b>✓</b>	Continuous Food Guarantee/ GMP				V		
Coconut Cream Flavor	В	N/A		<b>✓</b>	Certificate of Analysis, Sheet/ GMP	/Spec			V		
Concentrate/Flakes/ Flour/Milk Powder	С	Allergen		V	Spec Sheet/GMP	,			$\checkmark$		
	Р	Foreign Objects		$\checkmark$	Continuous Food Guarantee/GMP				V		
Coconut Flakes	В	N/A		<b>✓</b>	Certificate of Analysis, Sheet/ GMP	/Spec			V		
	С	Allergen		N.	Allergen Statement/0	GMP			$\checkmark$		
	Р	Foreign Objects		<b>▽</b>	Continuous Food Guara	antee/			V		
Coconut Flour	В	N/A			Certificate of Analysis, Sheet/ GMP	/Spec			V		
	С	Allergen		V	Spec Sheet/GMP	,			<b>✓</b>		
	Р	Foreign Objects		V	Continuous Food Guarantee/GMP				<b>✓</b>		
Coconut MCT Oil	В	N/A		V	Certificate of Analysis, Sheet/ GMP	/Spec			$\checkmark$		

DOCUMENT NAME  Hazard Analysis  (Ingredients/Components)			<b>ISSUE DATE</b> 4/4/2022			<b>PAGE</b> 35 of 58					
PLANT NAME & ADDRESS Otay Mesa 2735 Cactus Road San Diego CA 92154			SUPERSEDES 1/25/2022				REVIEWED/UPDATED BY:				
	С	N/A			Allergen Statement/0	SMP		П	✓		
	Р	Foreign Objects			Continuous Food Guard						
Coconut Milk Powder – Organic	В	N/A		<b>✓</b>	Certificate of Analysis, Sheet/ GMP	/Spec			✓		
	С	Allergen		$\vee$	Spec Sheet/GMP	,			$\checkmark$		
	Р	Foreign Objects		<b>✓</b>	Continuous Food Guarantee/GMP				V		
Coconut Oil – Organic	В	N/A		<b>✓</b>	Certificate of Analysis/Spec Sheet/ GMP				V		
	С	N/A		$\vee$	Allergen Statement/GMP				$\checkmark$		
	Р	Foreign Objects		$\checkmark$	Continuous Food Guarantee/ GMP				V		
Dark Cocoa Powder	В	N/A		$\checkmark$	Certificate of Analysis, Sheet/GMP	/Spec			V		
	С	N/A		$\vee$	Allergen Statement/	GMP			$\checkmark$		
	Р	Foreign Objects		$\checkmark$	Continuous Food Guara GMP	antee/			V		
Fibergel (Orange Pulp) – Conventional	В	N/A		<b>✓</b>	Certificate of Analysis, Sheet/ GMP	/Spec			V		
	С	N/A		N.	Allergen Statement/0	GMP			$\searrow$		
	Р	Foreign Objects		<b>▽</b>	Continuous Food Guarantee/ GMP				V		
Fibersmart Resistant Dextrin	В	N/A			Certificate of Analysis, Sheet/GMP	/Spec			N.		
Powder/Syrup - Organic	С	N/A		V	Allergen Statement/	GMP			<b>✓</b>		
	Р	Foreign Objects		V	Continuous Food Guard	antee/			V		
Flav-R-Bites Pink Color 4639	В	N/A		$\vee$	Certificate of Analysis, Sheet/ GMP	/Spec			$\checkmark$		

DOCUMENT NAME Hazard Analysis (Ingredients/Components)			ISSUE DATE 4/4/2022			<b>PAGE</b> 36 of 58					
PLANT NAME & ADDRESS Otay Mesa 2735 Cactus Road San Diego CA 92154			<b>SUPERSEDES</b> 1/25/2022				REVIEWED/UPDATED BY:				
	С	N/A	☐ ✓ Allergen Statement/G			SMP					
	Р	Foreign Objects			Continuous Food Guara	antee/					
Hazelnuts	В	N/A		$\checkmark$	Certificate of Analysis/Spec Sheet/ GMP				$\checkmark$		
	С	Allergen	V		Spec Sheet/GMP				$\checkmark$		
	Р	Foreign Objects		✓	Continuous Food Guarantee/GMP				$\checkmark$		
Hemp Seeds	В	N/A		<b>✓</b>	Certificate of Analysis/Spec Sheet/ GMP				V		
	С	N/A		V	Allergen Statement/GMP  Continuous Food Guarantee/ GMP				<b>∀</b>		
	Р	Foreign Objects		<b>✓</b>					N.		
IMO Powder/Syrup	В	N/A		<b>✓</b>	Certificate of Analysis, Sheet/GMP	/Spec			$\vee$		
	С	N/A		$\vee$	Allergen Statement/	GMP			$\checkmark$		
	Р	Foreign Objects		V	Continuous Food Guara GMP	antee/			V		
Lemons – Organic	В	N/A		<b>✓</b>	Certificate of Analysis, Sheet/ GMP	/Spec			V		
	С	N/A		V	Allergen Statement/0	GMP			$\checkmark$		
	Р	Foreign Objects		V	Continuous Food Guarantee/ GMP				$\vee$		
Macadamia Nut – Organic Raw	В	Salmonella	K		Certificate of Analysis/Spec Sheet/ GMP		Supply chain control (PC-8)	N			
	С	Allergen		V	Spec Sheet/GMP				<b>✓</b>		
	Р	Foreign Objects		V	Continuous Food Guarantee/GMP				V		
Monk Fruit 25% – Organic	В	N/A		V	Certificate of Analysis, Sheet/ GMP	/Spec			<b>✓</b>		

DOCUMENT NAME  Hazard Analysis (Ingredients/Components)		ISSUE DATE 4/4/2022			<b>PAGE</b> 37 of 58					
PLANT NAME & ADDRESS Otay Mesa 2735 Cactus Road San Diego CA 92154			<b>SUPERSEDES</b> 1/25/2022				REVIEWED/UPDATED BY:			
	С	N/A	П		Allergen Statement/0	amp		П	✓	
	P	Foreign Objects		\ \ \ \	Continuous Food Guar				✓	
Monk Fruit 50% – Organic Raw	В	N/A		✓	Certificate of Analysis Sheet/GMP	/Spec			✓	
	С	N/A		✓	Allergen Statement/	GMP			$\checkmark$	
	Р	Foreign Objects		$\checkmark$	Continuous Food Guar GMP	antee/			✓	
Nutmeg Powder – Organic	В	N/A		V	Certificate of Analysis Sheet/ GMP	/Spec			N	
	С	N/A		$\vee$	Allergen Statement/0	ЭMР			$\checkmark$	
	Р	Foreign Objects		\( \)	Continuous Food Guar GMP	antee/			K	
Pea Protein Crisps	В	N/A		$\checkmark$	Certificate of Analysis Sheet/GMP	/Spec			$\vee$	
	С	N/A		$\vee$	Allergen Statement/	GMP			$\checkmark$	
	Р	Foreign Objects		$\checkmark$	Continuous Food Guar GMP	antee/			V	
Pea Protein Powder – Organic	В	N/A		<b>✓</b>	Certificate of Analysis Sheet/ GMP	/Spec			V	
	С	N/A		N.	Allergen Statement/0	GMP			$\searrow$	
	Р	Foreign Objects		<b>▽</b>	Continuous Food Guar GMP	antee/			V	
Peanuts – Organics	В	Salmonella	K		Certificate of Analysis Sheet/GMP	/Spec	Supply chain control (PC-8)	V		
	С	Allergen		V	Allergen Statement/	GMP			V	
	Р	Foreign Objects		V	Continuous Food Guar GMP	antee/			V	
Pecans – Organic Roasted Unsalted	В	Salmonella	V		Certificate of Analysis Sheet/ GMP	/Spec	Supply chain program (PC-8)	$\checkmark$		

DOCUMENT NAME Hazard Analysis (Ingredients/Components)		ISSUE DATE 4/4/2022			<b>PAGE</b> 38 of 58				
PLANT NAME & ADDRESS Otay Mesa 2735 Cactus Road San Diego CA 92154			<b>SUPERSEDES</b> 1/25/2022				REVIEWED/UPDATED BY: States Mooden		
	С	Allergen		$\checkmark$	Allergen Statement/0	GMP			
	Р	Foreign Objects		<b>V</b>	Continuous Food Guara GMP	antee/			<b>✓</b>
Peppermint Flavor Extract	В	N/A		$\searrow$	Certificate of Analysis, Sheet/GMP	/Spec			V
	С	N/A			Allergen Statement/	GMP			
	Р	Foreign Objects		<b>✓</b>	Continuous Food Guara	antee/			V
Peppermint Flavor Oil	В	N/A		<b>✓</b>	Certificate of Analysis, Sheet/ GMP	/Spec			V
	С	N/A		$\checkmark$	Allergen Statement/0	GMP			V
	Р	Foreign Objects			Continuous Food Guard	antee/			N
Pumpkin Seeds	В	N/A		$\checkmark$	Certificate of Analysis, Sheet/GMP	/Spec			V
	С	N/A		$\checkmark$	Allergen Statement/	GMP			$\checkmark$
	Р	Foreign Objects		$\checkmark$	Continuous Food Guard	antee/			\
Raspberry Powder	В	N/A		V	Certificate of Analysis, Sheet/ GMP	/Spec			V
	С	N/A		$\checkmark$	Allergen Statement/0	GMP			$\checkmark$
	Р	Foreign Objects		<b>V</b>	Continuous Food Guard	antee/			\
Sea Salt (BHU Products only) –	В	N/A		$\checkmark$	Certificate of Analysis, Sheet/GMP	/Spec			\
Conventional	С	N/A		$\checkmark$	Allergen Statement/	GMP			$\vee$
	Р	Foreign Objects		$\checkmark$	Continuous Food Guard	antee/			V
Shortening (Palm Fruit Oil) – Organic	В	N/A		V	Certificate of Analysis, Sheet/ GMP	/Spec			V

DOCUMENT NAME Hazard Analysis (Ingredients/Components)		<b>ISSUE DATE</b> 4/4/2022			<b>PAGE</b> 39 of 58				
PLANT NAME & ADDRESS Otay Mesa 2735 Cactus Road San Diego CA 92154			<b>SUPERSEDES</b> 1/25/2022				REVIEWED/UPDATED BY:		
	_	21/2			All C	21.45			
	С	N/A			Allergen Statement/	INIP			$\checkmark$
	Р	Foreign Objects		$\triangleright$	Continuous Food Guar GMP	antee/			$\checkmark$
Strawberry Powder	В	N/A		V	Certificate of Analysis Sheet/GMP	/Spec			$\searrow$
	C	N/A		V	Allergen Statement/	GMP			V
	Р	Foreign Objects		$\vee$	Continuous Food Guar GMP	antee/			$\searrow$
Sunflower Lecithin – Organic	В	N/A		$\vee$	Certificate of Analysis Sheet/ GMP	/Spec			V
	С	N/A		$\vee$	Allergen Statement/0	ЭMР			$\checkmark$
	Р	Foreign Objects		$\checkmark$	Continuous Food Guar GMP	antee/			$\vee$
Sunflower Oil – Organic (for	В	N/A		$\vee$	Certificate of Analysis Sheet/GMP	/Spec			V
machine, lubricant)	С	N/A		$\vee$	Allergen Statement/	GMP			$\vee$
	Р	Foreign Objects		$\checkmark$	Continuous Food Guar GMP	antee/			$\searrow$
Sunflower Seeds – Organic Raw	В	N/A		$\checkmark$	Certificate of Analysis Sheet/ GMP	/Spec			V
	С	N/A		$\vee$	Allergen Statement/0	GMP			✓
	Р	Foreign Objects		<b>✓</b>	Continuous Food Guar GMP	antee/			V
Vanilla Extract – Organic	В	N/A		$\checkmark$	Certificate of Analysis Sheet/GMP	/Spec			V
	С	N/A		V	Allergen Statement/	GMP			$\checkmark$
	Р	Foreign Objects		<b>\</b>	Continuous Food Guar GMP	antee/			Y
Xanthan Gum – Conventional	В	N/A		$\checkmark$	Certificate of Analysis Sheet/ GMP	/Spec			V

DOCUMENT NAME Hazard Analysis (Ingredients/Components)  PLANT NAME & ADDRESS Otay Mesa 2735 Cactus Road San Diego CA 92154		ISSUE DATE 4/4/2022 SUPERSEDES 1/25/2022			PAGE 40 of 58  REVIEWED/UPDATED BY:  State & Moodel				
	Р	Foreign Objects		$\checkmark$	Continuous Food Guar GMP	antee/			✓
Water	В				San Diego's annual Dr Water Quality Report, Potability Test				$\vee$
	С				San Diego's annual Dr Water Quality Repo				V
	Р				San Diego's annual Dr Water Quality Rep				<b>✓</b>
Bar Film	В			✓	21 CFR 177/178 comp statement	liance			V
	С			✓	21 CFR 177/178 comp statement	liance			V
	Р			✓	21 CFR 177/178 comp statement	liance			V
Car Caddies	В				21 CFR 177/178 comp statement	liance			V
	С				21 CFR 177/178 comp statement	liance			$\vee$
	Р				21 CFR 177/178 comp statement	liance			$\searrow$
Pan Liners	В				21 CFR 177/178 comp statement	liance			V
	С				21 CFR 177/178 comp statement	liance			V
	Р				21 CFR 177/178 comp statement	liance			V
Bag – Chips/Granola	В			$\checkmark$	21 CFR 177/178 comp statement	liance			V
	С			✓	21 CFR 177/178 comp statement	liance			$\vee$
	Р			✓	21 CFR 177/178 comp statement	liance			$\checkmark$

DOCUMENT NAME  Hazard Analysis (Ingredients/Components)		ISSUE DATE 4/4/2022		<b>PAGE</b> 41 of 58					
PLANT NAME & ADDRESS Otay Mesa 2735 Cactus Road San Diego CA 92154		<b>SUPERSEDES</b> 1/25/2022			REVIEWED/UPDATED BY:				
Bag - Keto Bites	В			<b>∀</b>	21 CFR 177/178 comp statement	liance			✓
	С			<b>V</b>	21 CFR 177/178 comp statement	liance			✓
	Р			$\vee$	21 CFR 177/178 comp statement	liance			✓
Cookie Dough Jars	В			V	21 CFR 177/178 comp statement	liance			<b>V</b>
	С			$\searrow$	21 CFR 177/178 comp statement	liance			<b>✓</b>
	Р			$\searrow$	21 CFR 177/178 comp statement	liance			<b>✓</b>
Jar Side and Top/Granola/Chips Labels	В				21 CFR 177/178 comp statement	liance			V
Labels	С			V	21 CFR 177/178 comp statement	liance			N
	Р			$\searrow$	21 CFR 177/178 comp statement	liance			N
Cookie Dough Jar Lids	В			V	21 CFR 177/178 comp statement	liance			<b>V</b>
	С			$\checkmark$	21 CFR 177/178 comp statement	liance			<b>V</b>
	Р			V	21 CFR 177/178 comp statement	liance			<b>V</b>
BHU Fit Bar Master Case	В			V	21 CFR 177/178 comp statement	liance			✓
	С			$\searrow$	21 CFR 177/178 comp statement	liance			V
	Р			K	21 CFR 177/178 comp statement	liance			$\checkmark$

DOCUMENT NAME Process PC-1	<b>ISSUE DATE</b> 4/4/2022	<b>PAGE</b> 42 of 58
PLANT NAME/ ADDRESS Otay Mesa 2735 Cactus Road San Diego 92154	<b>SUPERSEDES</b> 1/25/2022	REVIEWED & UPDATED BY:

Baking [0	Cookies]	
Preventive (	Control	PC-1
Hazard(s)		Biological (Salmonella)
Parameters, values or critical limits		>200F for >5 mins.  Validation: FDA Thermal Study Salmonella Senfenberg (see Appendix IX)
	What	Chocolate Chip and Double Dark Cookies.
		Oven thermometer calibrated with certified thermometer.
Monitoring	How	Verify the oven thermometer is within 1 degree F of the certified thermometer or replace the oven thermometer.
	Frequency	Every batch
	Who	Qualified trained operator
Corrective A	Action	Place product batches on hold until the last acceptable test. If time/temp is not obtained, perform a risk assessment with a sample sent to the approved lab. Otherwise, destroy the batch.
		Place the oven out of commission (tag/lock), request service immediately.
Verification		SQF Practitioner or Production management will verify for time and temperature on the Oven Record Log, as well as any deviations.
		Oven Record
Becardo		Standardization to the NIST thermometer
Records		If applicable, deviation report.
		Training record is also required.

DOCUMENT NAME Process PC-2 (CCP)	<b>ISSUE DATE</b> 4/4/2022	<b>PAGE</b> 43 of 58
PLANT NAME/ ADDRESS Otay Mesa 2735 Cactus Road San Diego 92154	<b>SUPERSEDES</b> 1/25/2022	REVIEWED & UPDATED BY:

X-Ray Ch	X-Ray Check for Extraneous Matter [All Products]					
Preventive C	Control	PC-2 (CCP)				
Hazard(s)		Physical				
Parameters, values or critical limits		<7mm; validated by FDA 555.425 and manufacturer's standards 2.0mm ferrous, 2.0mm non-ferrous, 2.0mm 316 stainless steel.				
	What	Identical X-Ray units: A & B				
Monitoring	How	Using individual card standards: 2.0mm ferrous, 2.0mm non-ferrous, 2.0mm 316 stainless steel to challenge.				
	Frequency	At start of production, with intervals of every two hours, until the end of production.				
	Who	Qualified trained x-ray operator.				
Corrective A	ction	If a metal standard is not detected by the x-ray unit, then retest the product. If the unit does not detect the retest metal standard, then place all products on hold to the last acceptable test.				
Verification		The x-ray is challenged every 2 hours and verified by SQF Practitioner or Production management for the three metal standards.				
		Sign and date.				
		Daily challenge results are recorded on the X-Ray Log.				
Records		If applicable, deviation report with hold/disposition log.				
		Training record is also required.				

DOCUMENT NAME Process PC-3	ISSUE DATE 4/4/2022	<b>PAGE</b> 44 of 58
PLANT NAME/ ADDRESS Otay Mesa 2735 Cactus Road San Diego 92154	<b>SUPERSEDES</b> 1/25/2022	REVIEWED & UPDATED BY:

Roasting	Roasting of raw nuts and seeds					
Preventive (	Control	PC-3				
Hazard(s)		Biological (Salmonella)				
Parameters, values or critical limits		>220F >5 minutes				
	What	Raw nuts and raw seeds				
Manitanina	How	Oven thermometer calibrated with certified thermometer				
Monitoring	now	Verify the oven thermometer is within 1 degree F of the certified thermometer or replace the oven thermometer.				
	Frequency	Every batch				
	Who	Qualified trained operator				
Corrective A	Action	Place product batches on hold until the last acceptable test. If time/temp is not obtained, perform a risk assessment with a sample sent to the lab. Otherwise, destroy the batch.				
		Place the oven out of commission (tag/lock), request service immediately.				
Verification		SQF Practitioner or Production management will verify for time and temperature on the Oven Record Log, as well as any deviations.				
		Oven Record				
Records		Standardization to the NIST thermometer				
		If applicable, deviation report with hold/disposition log.				
		Training record is also required.				

DOCUMENT NAME	ISSUE DATE	<b>PAGE</b>
Allergen PC-4	4/4/2022	45 of 58
PLANT NAME/ ADDRESS Otay Mesa 2735 Cactus Road San Diego 92154	<b>SUPERSEDES</b> 1/25/2022	REVIEWED & UPDATED BY:

Food Alle	Food Allergen Preventive Controls [All products]				
Preventive Control		Allergen wash equipment testing (PC-4)			
Hazard(s)		Peanut and/or tree nuts residue* on processing equipment.			
Parameters		Allergen residue must be removed during sanitation SSOP procedure to acceptable testing level.			
	What	Process equipment surfaces and utensils.			
Monitoring	How	Swab technique using Neogen or Hygiena specific allergen test kits.			
Monitoring	Frequency	Monthly; to be tested after cleaning or changeover of allergen ingredients.			
	Who	SQF Practitioner or designated person educated and trained in the procedure.			
Corrective A	Action	Failed process equipment and utensils are rewashed, sanitized and confirmed by a negative test prior to usage or before startup.			
Verification		Preoperative inspection results Allergen test result for Hygiena or Neogen Peanut and Cashew; monthly or as needed by SQF Practitioner.			
		Annual allergen validation study			
		Monthly allergen test results or as needed			
Records		Employee training record for swab technique			
		Preoperative inspections report			
		Corrective action records			
		Verification records			

<sup>\*</sup>Tree Nuts = Hazelnuts, Pecans, Almonds, Cashews, Coconuts, Macadamia Nuts

DOCUMENT NAME Allergen PC-5	<b>ISSUE DATE</b> 4/4/2022	<b>PAGE</b> 46 of 58
PLANT NAME/ ADDRESS Otay Mesa 2735 Cactus Road San Diego 92154	<b>SUPERSEDES</b> 1/25/2022	REVIEWED & UPDATED BY:

Food Allergen Preventive Controls [All products]				
Preventive Control		Product labels with allergens (PC-5)		
Hazard(s)		Undeclared allergens on label packaging		
Parameters		All finished products must declare the specific allergen (peanuts and/or tree nuts* used in the formula)		
) Au		Product package label		
	What	Ingredient listing and allergen declaration matches product		
Monitoring	How	Visual inspection of proof or carton label to match product formula		
Monitoring	Eroguanav	All new or modified product labels (before purchasing or use in production)		
	Frequency	One sample film or caddy is inspected by supervisors to ensure accuracy prior to the start of the production run.		
	Who	SQF Practitioner for label proofs		
		Production supervisors for actual units		
		If labels are incorrect, destroy them.		
Corrective A	ation	Identify root cause; retrain as needed to prevent mislabeling recurrence.		
Corrective A	ction	Recall if any finished product has left the facility.		
		Replacement labels purchased.		
Verification		Label approval involves sign off from designated proofers in management, label manufacturer with a proof, and a consultant if necessary.		
		Label SOP approvals.		
Records		Label approvals/Corrective action records		
		Verification of production records		

<sup>\*</sup>Tree Nuts = Hazelnuts, Pecans, Almonds, Cashews, Coconuts, Macadamia Nuts.

DOCUMENT NAME Process PC-6	<b>ISSUE DATE</b> 4/4/2022	<b>PAGE</b> 47 of 58
PLANT NAME/ ADDRESS Otay Mesa 2735 Cactus Road San Diego 92154	<b>SUPERSEDES</b> 1/25/2022	Stephen & UPDATED BY:

Environm	Environmental Pathogenic Preventive Control [All products]				
Preventive Control		Monitoring and testing process equipment and environment (PC-6).			
Hazard(s)		Vegetative Salmonella pathogen.			
Parameters		Process equipment and surroundings are free of pathogens.			
	What	Surface of processing equipment, utensils, and surrounding areas.			
Manifes with a	How	Swab method APHA and Hygiena.			
Monitoring	Frequency	Annual testing or as needed by approved ISO17025 or equivalent micro laboratory for salmonella.			
Who		SQF Practitioner to collect samples; approved laboratory to conduct the test.			
Corrective A	ction	If a positive test result for pathogens is received, follow environmental monitor protocol.  Retest until the contamination has been proven to be eliminated.			
		SQF Practitioner reviews and evaluates lab results with a sign-off.			
Verification		Verify with ATP swabs quarterly (AOAC).			
		Routine Aw checks of products and/or formula when deemed necessary by SQF Practitioner.			
		Laboratory results from sample testing (with retest records, if necessary).			
Records		Root Cause Analysis Report			
		Approved Lab Certificate			
		ATP surface results			

All Bhu Foods products have water activity (Aw) less than 0.65. The low Aw will not support pathogenic growth and reproduction. Per the FDA 2017 Food Code, these products are classified as non potentially hazardous.

DOCUMENT NAME Sanitation PC-7	<b>ISSUE DATE</b> 4/4/2022	<b>PAGE</b> 48 of 58	
PLANT NAME/ ADDRESS Otay Mesa 2735 Cactus Road San Diego 92154	<b>SUPERSEDES</b> 1/25/2022	REVIEWED & UPDATED BY:	

Sanitation	Sanitation Preventive Control [Equipment, utensils, and surroundings]				
Preventive C	ontrol	Validation of cleaning program (equipment, utensils, and surroundings) PC-7			
Hazard(s)		Pathogen Salmonella not removed during cleaning due to introduction of environmental pathogens and spoilage microorganisms from ingredients, employees, and/or unclean environment.			
Parameters		All processing equipment, utensils, and surroundings must be cleaned, sanitized and be free of pathogens and spoilage.			
	What	Surface of unclean and clean processing equipment, utensils, and surroundings.			
<b>88</b> 14 1	How	Swab method to monitor unclean and clean surface result differences.			
Monitoring	Frequency	Validation done annually or as needed if new cleaning detergents and/or sanitizers are used.			
	Who	SQF Practitioner for sampling; approved laboratory for testing			
Corrective A	ction	If the validation results cannot be reported from cleaning and procedure, then revalidate.			
Verification		ATB monthly swab testing (Hygiena)			
		Annual validation or as needed for Sanitation SSOP			
Records		Sanitation validation study results			
		ATB monthly swab testing (Hygiena)			
		Preoperative inspection records			
		Annual and specific sanitation education and training records for employees			

DOCUMENT NAME Supply Chain Control PC-8	<b>ISSUE DATE</b> 4/4/2022	<b>PAGE</b> 49 of 58
PLANT NAME/ ADDRESS Otay Mesa 2735 Cactus Road San Diego 92154	<b>SUPERSEDES</b> 1/25/2022	REVIEWED & UPDATED BY:

Supply Cl	Supply Chain Control PC-8				
Preventive C	ontrol	Approved Supplier Program PC-8			
Parameters		All ingredients selected by risk assessment analysis and required documents (third party food safety audit, continuous food guarantee, certificate of analysis (COA), organic certificate and supplier questionnaire)			
	What	Approved food safety documents and COAs			
Monitoring	How	Review documents and COAs			
Monitoring	Frequency	Annual or as needed for approved supplier Each load or lot with accompanying COA			
	Who	SQF Practitioner and/or Purchasing Manager			
Corrective A	ction	If the supplier does not provide the required food safety documents, then place on rejection or probation until appropriate corrective action.			
		If a supplier ingredient or packaging does not meet agreed specifications then place on rejection or probation until appropriate corrective action.			
Verification		Purchasing SOP Receiving Log– each ingredient and/or packaging loads/lots			
Records		2022 Supplier Information folder Supplier COA Supplier Document Register Receiving Log			

DOCUMENT NAME  Verification Procedures for  Supply-Chain-Applied Control  Ingredients	ISSUE DATE 4/4/2022	<b>PAGE</b> 50 of 58
PLANT NAME/ ADDRESS Otay Mesa 2735 Cactus Road San Diego 92154	<b>SUPERSEDES</b> 1/25/2022	REVIEWED & UPDATED BY:

Ingredient (Requiring PC-8)	Approved Supplier	Hazards (Requiring PC-8)	Date of Approval	Verification Method	Verification Records
Almonds	Tierra Farm	Salmonella	4/4/2022	Receiving Log, Purchasing SOP.	Supplier Document Register, 2022 Supplier Information Folder, Receiving Log, Certificate of Analysis, Ingredient Specification Sheet.
Cashews	Tasty Nut Industries via Totally Nuts	Salmonella	un	4677	un
Chia Seeds	Nuts.com	Salmonella	6233	433	un
Hazelnuts	Capitol Distribution Company via LinkOne	Salmonella	un	417	un
Hemp Roasted Seeds	Victory Foods PBC/Victory Hemp Foods via LinkOne	Salmonella	un	un	459
Macadamia Nuts	Bedemco Inc. via Global Resources Direct, LLC	Salmonella	ия	ш	433
Peanuts	Multiple Organics	Salmonella	4439	433	un
Pea Protein Crisps	Cereal Ingredients Incorporated	Salmonella	ш	un	4439
Pea Protein Powder	Fenchem Biotek Ltd.	Salmonella	4279	437	u"
Pecans	Nuts.com	Salmonella	un	6233	un
Pumpkin Seeds	Baoqing Crown Star Agricultural Products Co., Ltd. via LinkOne	Salmonella	ия	ш	4139
Sunflower Seeds	Capitol Distribution Company via LinkOne	Salmonella	437	437	437

<b>DOCUMENT NAME</b> Food Allergen Ingredient Analysis	<b>ISSUE DATE</b> 4/4/2022	<b>PAGE</b> 51 of 58
PLANT NAME/ ADDRESS Otay Mesa 2735 Cactus Road San Diego 92154	<b>SUPERSEDES</b> 1/25/2022	REVIEWED & UPDATED BY:

Product Full Name	Allergens
FIT BAR APPLE CHUNK CINNAMON NUTMEG	NONE
FIT BAR DARK CHOCOLATE COCONUT ALMOND	ALMONDS, COCONUT FLAKES
FIT BAR DOUBLE DARK CHOCOLATE CHIP	NONE
FIT BAR PEANUT BUTTER CHOCOLATE CHIP	PEANUTS (PEANUT BUTTER)
FIT BAR PEANUT BUTTER WHITE CHOCOLATE	PEANUTS (PEANUT BUTTER), COCONUT MILK POWDER
FIT BAR SALTED CARAMEL PECAN	PECANS
FIT BAR SNICKERDOODLE COOKIE DOUGH	NONE
FIT BAR SUPERFOOD CHOCOLATE CHIP COOKIE DOUGH	CASHEWS (CASHEW BUTTER)
FIT PROTEIN GRANOLA	COCONUT FLAKES
FIT CHOCOLATE PROTEIN GRANOLA	COCONUT FLAKES
FIT CINNAMON PROTEIN GRANOLA	COCONUT FLAKES
FIT COOKIE CHOCOLATE CHIP	CASHEWS (CASHEW BUTTER)
FIT COOKIE DOUBLE DARK CHOCOLATE	CASHEWS (CASHEW BUTTER)
KETO BITES CHOCOLATE CHIP COOKIE DOUGH	CASHEWS (CASHEW BUTTER)
KETO BITES CHOCOLATE MINT COOKIE DOUGH	CASHEWS (CASHEW BUTTER)
KETO BITES DOUBLE DARK CHOCOLATE COOKIE DOUGH	CASHEWS (CASHEW BUTTER)
KETO BITES PEANUT BUTTER CHOCOLATE CHIP COOKIE DOUGH	PEANUTS (PEANUT BUTTER)
KETO BITES WHITE CHOCOLATE MACADAMIA COOKIE DOUGH	CASHEWS (CASHEW BUTTER), MACADAMIA NUTS, COCONUT MILK POWDER
KETO BAR CARAMEL PEANUT CHOCOLATE CHIP COOKIE DOUGH	CASHEWS (CASHEW BUTTER), PEANUTS
KETO BAR CHOCOLATE CHIP COOKIE DOUGH	CASHEWS (CASHEW BUTTER)
KETO BAR CHOCOLATE COCONUT COOKIE DOUGH	CASHEWS (CASHEW BUTTER), COCONUT FLAKES
KETO BAR CHOCOLATE MINT COOKIE DOUGH	CASHEWS (CASHEW BUTTER)
KETO BAR DOUBLE DARK CHOCOLATE CHIP COOKIE DOUGH	CASHEWS (CASHEW BUTTER)

<b>DOCUMENT NAME</b> Food Allergen Ingredient Analysis	<b>ISSUE DATE</b> 4/4/2022	<b>PAGE</b> 52 of 58
PLANT NAME/ ADDRESS Otay Mesa 2735 Cactus Road San Diego 92154	<b>SUPERSEDES</b> 1/25/2022	REVIEWED & UPDATED BY:

PEANUTS (PEANUT BUTTER)
CASHEWS (CASHEW BUTTER)
CASHEWS (CASHEW BUTTER), MACADAMIA NUTS, COCONUT MILK POWDER
PEANUTS (PEANUT BUTTER), COCONUT MILK POWDER
CASHEWS (CASHEW BUTTER)
CASHEWS (CASHEW BUTTER), COCONUT FLAKES
CASHEWS (CASHEW BUTTER)
PEANUTS (PEANUT BUTTER)
CASHEWS (CASHEW BUTTER), COCONUT MILK POWDER
CASHEWS (CASHEW BUTTER)
HAZELNUTS (HAZELNUT BUTTER)
ALMONDS (ALMOND BUTTER)
CASHEWS (CASHEW BUTTER)
CASHEWS (CASHEW BUTTER)
NONE

DOCUMENT NAME Allergen Verification Listing/ Allergen Scheduling and Cleaning Implications	ISSUE DATE 4/4/2022	<b>PAGE</b> 53 of 58
PLANT NAME/ ADDRESS Otay Mesa 2735 Cactus Road San Diego 92154	<b>SUPERSEDES</b> 1/25/2022	REVIEWED & UPDATED BY:

Allergen Verification Listing

# **FACILITY ALLERGENS**

**Processed Almond Nuts/Flour** 

**Processed Cashews** 

**Processed Peanuts** 

**Processed HazeInuts** 

**Processed Coconut Flakes, Coconut Milk Powder** 

**Raw Macadamia Nuts** 

**Raw Pecan Nuts** 

DOCUMENT NAME  Allergen Verification Listing/  Allergen Scheduling and Cleaning  Implications	<b>ISSUE DATE</b> 4/4/2022	<b>PAGE</b> 54 of 58
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### **Production Line Allergen Assessment**

### Scheduling Implications:

Allergens have shared use of a singular production line in the facility. As a best practice, different allergens will be scheduled on different days. Peanut products should be handled with care as peanut is the most common allergen for human consumption out of our list of nut ingredients. If different allergens must be run on the same day, the following procedure below is to be followed.

#### Allergen Cleaning Implications:

Products which share the same allergens can be run without a mandatory changeover cleaning, for example bars which only contain cashews. Tree nuts cannot be considered to be a singular allergen. Each type of tree nut is a different allergen. Someone could be allergic to cashews but not to coconut, etc.

The below are acceptable examples of a production changeover during a scheduled date of peanut, cashew, and macadamia nut derived products.

#### **EXAMPLE #1**

First: Keto Peanut Butter Chocolate Chip Bar (Peanut)

ALLERGEN CLEAN BEFORE CHANGEOVER

**Second**: Keto Chocolate Chip Bar (Cashew)

NO CHANGEOVER ALLERGEN CLEANING NECESSARY

Last: Keto White Chocolate Macadamia (Cashew, Macadamia Nut)

#### **EXAMPLE #2**

First: Keto Chocolate Chip Bar (Cashew)

NO CHANGEOVER ALLERGEN CLEANING NECESSARY

**Second**: Keto White Chocolate Macadamia (Cashew, Macadamia Nut)

ALLERGEN CLEAN BEFORE CHANGEOVER

**Last**: Keto Peanut Butter Chocolate Chip Bar (Peanut)

<b>DOCUMENT NAME</b> Product Hold Templates	<b>ISSUE DATE</b> 4/4/2022	<b>PAGE</b> 55 of 58
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Product Hold and Disposition Report			
Date	Product		
Product Lot #			
Reasons for Hold			
Action			
Resolution			
Resolution Date	Approved by		
Verification Date	Verified by		
Product Hold and Re	elease Log Summary Template		
Location			
Hold Date			
Hold Number			
Product & Lot Number Quantity/Reason for Hold			
Hold Placed by (Signature)			
Resolution Resolution Approved By (Signature)			
Release Date Verified By			

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QA HOLD / RET	ENCIÓN DE QA	QA HOLD / RET	ENCIÓN DE QA
	VE / NO QUITAR	DO NOT REMOV	
Hold Date:		Hold Date:	
Hold Date:		Hold Date:	
Hold Product Name:		Hold Product Name:	
Hold Product Lot Number:		Hold Product Lot Number:	
Hold Product Amount/Weight:		Hold Product Amount/Weight:	
Hold Product Location:		Hold Product Location:	
Instructions:		Instructions:	
For QA Use On	y / Solo Para QA	For QA Use Only	/ / Solo Para QA
Date:		Date:	
Hold Number:		Hold Number:	
Reason for Hold:		Reason for Hold:	
Final Disposition:		Final Disposition:	
Approved by:		Approved by:	
Signature:		Signature:	
DO NOT REMO	VE / NO QUITAR	DO NOT REMOV	/E / NO QUITAR

DOCUMENT NAME Deviation Report Template	<b>ISSUE DATE</b> 4/4/2022	<b>PAGE</b> 57 <b>of</b> 58
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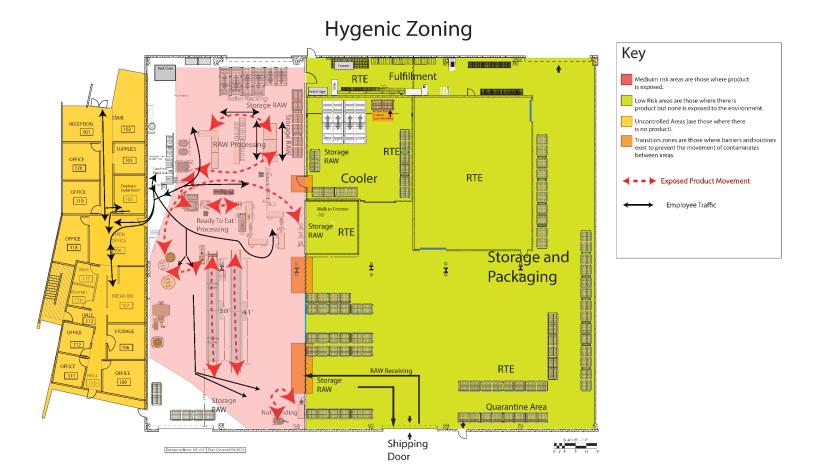
## BHU FOODS Deviation Report

Version Date: 3/30/22

Version Number: 1.0

Product: Product Lir		Product Line:			
Facility:					
Identify the Deviation:					
,					
When did the deviation occur?	Date:		Time:	am/pm	
Reported by:		Initial:	Shift:		
Reason for holding the product:					
0 1					
Amount of product held:					
Person placing product on hold: Initial:					
Disposition and/or release of product:					
Person making the product disposition:			Date:		
Signature:					
Actions to prevent the deviation from recurring:					
Person making recommendation:					
Initial: Date:		Date:	Data		
Approved by:			Date:		

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Document Name HZ v1.0 | Date Greated 6/01/2022

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## Hygenic Zoning

