

PVI Number: PR.001	Revised:
Title: Good Manufacturing practices Program	Replaces: New

PURPOSE: To prevent contamination in the facility and ensure the food safety of food contact materials and all food products.

RESPONSIBILITY: It is mandatory that each employee of Palermo's adhere to the following Good Manufacturing Practices (GMP's) as outlined below

FREQUENCY: Ongoing

PROCEDURE:

A. Personnel Practices – Clothing:

1. Hairnets and Beard Nets

- a. Worn to prevent hair from potentially entering the ingredients and products, including coverage of beard and moustache.
 - i. Beard nets must be worn over beards longer than 1/8" or one day's growth.
- b. Must be worn in designated hallways, frock room, production room, packaging room, bakeries, and warehouse.
- c. Must be company issued.
- d. Cover the ears and back of neck so that no hair is exposed from the hairnet.
- e. Don't tie or knot hairnets.
- f. A hair net must be worn before the frock is put on to prevent hair contamination.
- g. Hairnets must cover clean scarves, bandanas and knit hats.
 - i. No baseball caps or beaded and sequined scarves are allowed.
- h. Replace daily or more often, as needed, if soiled with sauce, outside elements, holes, etc.
- i. Hairnets/beard nets are mandatory in the maintenance shop when work is being completed on machinery that has contact with product.

2. Frocks

- a. A company issued frock must be always worn while in designated areas. These areas include the production room, packaging room, and bakeries.
 - i. White Frocks are worn by all production and management personnel that may handle food.
 - a) Visitors are required to wear white frocks.
 - ii. Warehouse personnel MUST wear a frock over their freezer coat when in Processing/Packaging areas. This is to prevent the risk of contaminating open product.
 - iii. Warehouse personnel MUST wear a white frock when grabbing Raw material samples for the R&D department.
- b. Maintenance Mechanics and Facilities personnel are not required to wear frocks when not working with food or direct food contact equipment. They can wear only company issued uniforms.
- c. Non-food contact material handlers, sanitation and outside mechanical support personnel who will be working on equipment, moving garbage or recycling are required to wear red or blue frocks.

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- i. Disposable frocks may be available in the event of a non-food contact frock shortage.
 - d. Frocks are not allowed in locker rooms, restrooms, lunchroom, café, maintenance shop (including electrical and refrigeration room), or outside.
 - i. Frocks may be worn in Office and the Quality Assurance Lab, but frocks must be removed when performing sensory taste testing or performing other activities that may be a potential cross contamination concern.
 - a) In case of an emergency and Frocks are worn outside, they MUST be replaced after re-entry to operations.
- 3. Plastic Aprons
 - a. Blue (food contact) aprons can be optionally worn over the white frock whenever handling food or in contact with food contact surfaces during production.
 - b. Yellow (sanitation) aprons are to be worn over white frocks during changeover sanitation or during production runs ONLY while actively performing cleaning duties.
 - c. DO NOT tie aprons in front of your body. Tie behind back to reduce foreign material risk.
 - d. Must be changed when they become visibly soiled to maintain sanitary conditions.
 - i. If transporting product or equipment in the production hallway, plastic aprons must be inspected for gross contamination prior to returning to the production floor.
 - e. Replace damaged aprons and sleeves.
 - f. Should be removed prior to leaving the production floor unless transporting product or equipment in the hallway.
- 4. Gloves
 - a. Blue Food Contact Gloves – may be worn when handling food or in contact with direct food contact surfaces (see 4.a.i. below for exceptions).
 - i. If production conditions are so that employees cannot wear blue gloves, production employees will maintain sanitary product and equipment handling.
 - b. Yellow Sanitation Gloves – may be worn during changeover sanitation or during production runs ONLY while actively performing cleaning duties.
 - c. Non-food contact (NFC) gloves (cloth gloves) may be worn when handling non-direct food contact product or surfaces (i.e. pallets, master cases, etc).
 - i. If an employee goes from using NFC activities to direct food contact activities, their hands must be washed prior to using food contact gloves.
 - ii. Employees who utilize cloth gloves will be provided a replacement pair when gloves become soiled.
 - a) Cloth gloves may be worn underneath blue/yellow gloves only if they are in clean and sanitary condition.
 - d. When used, they are to be intact, clean, and in sanitary condition.
 - e. Gloves are to be disposed of and replaced, as necessary, when they become soiled.
 - f. Hands must be washed prior to putting on gloves.
- 5. Shoes
 - a. Must have slip resistant soles.

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- b. Must cover the entire foot with no exposure of skin/sock.
- c. No loafers, sandals, dress shoes, or slippers are allowed.

6. PPE

- a. All employees and visitors are required to wear earplugs.
- b. Bump caps must be worn for head protection.
 - i. Bump caps must be wiped down with an approved sanitizer wipe if:
 - a) bump cap is dropped on the floor
 - b) bump cap becomes soiled
- c. Eye protection is mandatory.
 - i. Glasses with decorative beads and or stones are not allowed.

7. Personal clothing

- a. Report to work every day with clean clothes.
- b. Pants must be above the bottom of the shoe to avoid potential contamination of food.
- c. Pants and shirts must have a hemline, meaning no cut offs or hanging strings.
- d. There shall be **no beaded or sequined clothing** worn at all.
- e. No skirts, dresses, shorts, or capri pants are allowed in the Processing, Packaging, Bakery, Maintenance, Sanitation or Warehouse areas (including visitors and contractors).
- f. Hoods must be tucked under the frock and not worn over the head.
- g. Clothing or personal belongings are not to be stored in areas where food is exposed or where equipment or utensils are stored.

B. Personnel Practices – Hygiene:

1. Hands

- a. Wash hands before starting work, after lunch and break, after using the washroom, and anytime hands become contaminated.
- b. Wash hands every time the production areas are entered, including the bakeries.
- c. Employees may sanitize their hands after washing if sanitizer is available.

2. Perfume/Cologne/Aftershave

- a. Excessive perfume, cologne or aftershave that may have the potential to contaminate product is not permitted. Any violations will be evaluated by management on a case by case basis.

3. Cuts, scrapes, and lesions

- a. Shall be reported to your supervisor immediately
- b. All blood incidences shall be reported to Quality Assurance Auditors so that area can be cleaned, sanitized, swabbed, and released for production. (QA.110)
- c. Cover with a Palermo's issued blue metal-detectable Band-Aid, **and** an appropriate glove when necessary. If this is not possible due to the size of the cut/lesion, the employee will be

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restricted from performing any operations which could potentially result in contaminated product.

4. Illness

- a. Employees must report health conditions or sicknesses to their supervisor.
- b. Employees who are experiencing diarrhea or viral illness and who may come in contact with food, food-contact surfaces, or food packaging materials shall be restricted from performing any operations which may result in contamination until recovery has occurred.
- c. Medication is not permitted on the production floor or service areas to avoid product contamination.
 - i. All medication, including cough lozenges, pain relievers, etc. must be kept employees' personal lockers.
 - ii. If you have a medical condition which requires that you carry your medication with you at all times -- you are responsible for notifying and gaining advance approval from your supervisor and HR. The HR department shall maintain the listing of medication.

5. Employees are required to be clean and presentable when reporting to work daily and must practice good personal hygiene.

C. Foreign Material Prevention:

1. Any person(s) found to have been party to acts, deliberate or otherwise, which result in food tampering, food or process contamination or spoilage or destruction of product will be subject to, in addition to Company's disciplinary procedures, prosecution to the fullest extent of the law.
2. No glass or ceramic dishes are allowed in the production areas. This includes, but is not limited to, glass bottles, containers, bowls, and plates.
3. Jewelry which includes, but is not limited to, watches, earrings, necklaces, rings, bracelets, and facial rings (including tongue piercing) are not allowed in the production areas of the facility. Facial studs that are not removable must be covered with a company issued metal detectable band aid.
4. No beads, sequins, decorative items on clothing or hair clips are allowed in production areas.
5. Fingernails must be clean and properly trimmed. Nail polish of any kind (including clear nail polish) is not allowed in the production areas.
 - a. Visitors or office employees not coming in contact with open food or food contact equipment may wear cotton gloves to cover nail polish.
6. Fake nails, glittery make-up, or false eyelashes are not allowed in the production areas.
7. No personal belongings, including personal electronics, are to be hanging on the outside of street clothes. These items must be kept in assigned lockers or stored securely in pockets.
8. Food or food like substances including gum, candy, or beverages are not allowed to be consumed or stored in the production areas or locker rooms.
9. Closed food containers are allowed in designated break areas only.

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10. Food and drinks must be sealed and covered in the hallways during transportation to a corporate business office area or outside.
11. All tobacco and like substance (i.e. betel nut, electronic cigarettes-vapors) is only permitted outside in the designated area. Use of these types of products is not allowed in the production area, locker rooms, restrooms, or common areas such as break rooms, lobbies, meeting rooms etc.
12. All items/pallets entering the production area must be free of debris. It is up to the assigned material handler to ensure this guideline is met.
13. Employees must maintain a sanitary environment in all areas of the facility. This includes no spitting, proper disposal of trash, cleaning up spills, properly maintaining the cleanliness when using the restroom facilities, Palermo Hall, etc.
14. All writing utensils MUST be metal detectable, received from the frock room. Any pens, markers, or other writing utensils that are not metal detectable must be kept in assigned lockers with other personal belongings.

D. Product Protection:

1. Maintain sanitary bathrooms by placing toilet paper into toilets, sanitary products into the designated containers, and paper towel into garbage containers.
2. Do not sit on conveyors, cases, tables or equipment as product contamination and damage may occur.
3. For equipment repairs, all ingredients/finished products staged near the equipment will be removed from the area by production employees only so that they remain in sanitary condition.
4. All employees must follow Sanitary Operating Procedures (HACCP, GMP's, and SSOP's).
5. All PPE shall be in sanitary condition and sanitized/replaced as needed.
6. No open product shall be on the same work area as other foreign material (pens, paper, box cutters, etc.)
7. Garbage bins shall be placed and maintained throughout the processing, maintenance, ingredient and final product storage, shipping and receiving areas. The bins are defined by the Color Code Chart (QA.059).
8. Plant office areas shall remain free of clutter by means of labeled garbage and recycling containers.
9. The lunchroom shall be maintained in a sanitary manner by picking up after oneself when finished with break. Throw garbage away and store lunch totes in designated areas. Wipe out microwaves if food has splattered during use.
10. Any wrapped pizzas that fall off the line to the floor must be sanitized with a Sani-Wipe before placing the pizza back on the line.

E. Product/Equipment Handling:

- Employees must handle exposed product or food ingredients in a manner that is adequate to prevent direct food contamination or adulteration.

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- Wood pallets must be held in such a manner as to prevent production contamination.
- Product identified as inedible is not used as edible.
- Direct Food Contact packaging must be handled and stored in a manner that is adequate to prevent cross contamination.
- Intact packaged raw materials (i.e. honey or balsamic packets) or finished pizzas that fall on the floor must be sanitized with Sani-wipe prior to being placed back on the line.
- Equipment, materials, and utensils are maintained in a manner that does not create insanitary conditions or result unintentional contamination of products.
- Cleaning and sanitizing of utensils and equipment must be conducted in a manner that protects against allergen cross-contact and against contamination of food, food-contact surfaces, or food-packaging materials.
 - When using pressurized air to blow the line during production run, a gap will be placed on the line to eliminate the risk of cross contamination.
 - Pressurized air is not to be used when running product with a controlled allergen.
- Product-contact equipment repaired during production is cleaned/sanitized and inspected prior to use.
- Containers for “inedible” are labeled as such prior to use.
- Containers holding cleaners, sanitizers, and lubricants are properly marked
- White and blue bins are designated for product contact only, and can be used to catch, store and transfer product or ingredients that are or are to be used in the process of making finished products.
- White product contact bins are not to be placed directly on the floor.
- Non-products contact bins being used in the purpose of catching waste cannot be in direct contact with a product contact bin.
- Product contact bins that became inadvertently contaminated must be emptied, cleaned, and sanitized before use.
- Gray bins are designated for non-product contact only and can be used to catch and transfer product intended for inedible waste.
- Corrective Action will address product disposition and restoration of sanitary conditions
- For product handling, if product contamination or adulteration is suspected, a risk analysis is performed to determine the hazard. Product disposition will be taken as applicable.

F. Outside Visitor:

All visitors must sign confidentiality agreement prior to touring facility unless approval is granted by CEO or COO.

1. Visitors must sign in on Palermo Villa, Inc Visitors Log. All information must be completed: [Date, Name, Company, Hosting Employee Name, License Plate, Time in and Time Out.]

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2. Visitors should wear flat shoes with rubber soles. These must fit easily inside of rubber overshoes. Palermo's requires rubber overshoes to be worn while in the plant. (No heels, open toed shoes, sandals, or dress shoes are allowed for your protection). We provide slip resistant rubbers due to the nature of the floors in our processing areas. These processing areas may become slippery.
3. Clothing worn while on the tour should not have any beads, buttons, or items that may fall off while in our processing areas. This is to prevent foreign objects from falling into our process containers, lines, or products. Clothing should also be practical fit so that while in our processing areas, they do not get caught in moving conveyors or equipment. Visitors should know that our processing rooms are temperature controlled to 40-55 F. Our freezers are -10 F and coolers are 36-40F if you intend to view these areas. Please wear clothing that will keep you warm in these areas.
4. Visitors are also required to wear ear plugs and safety glasses in production areas.
5. All jewelry must be removed prior to entering production areas. This includes pins, hairpins, watches, rings, etc. that may become foreign material in our products.
6. Hair net covering your ears and wear beard net (if applicable) at all times in the plant. Beard nets must be worn over beards longer than 1/8" growth. Hairnets must be put on first before the frock. Do not wear frocks into the lunchroom, washroom, café, or outside of the building. Hang frocks on provided hooks in each area. Frocks must be hung in their designated areas.
7. Palermo's produces pizzas with the following allergens: egg, milk, soy, and wheat. Any visitor with allergies to these items must report it to their tour guide.
8. Contractors and visitors are made aware of proper allergen handling and storage procedures as necessary before gaining entrance to the plant. They are also made aware of any chemical hazards if needed.
9. Any signs of contagious illness or symptoms within the past 24 hours of diarrhea, vomiting, open sores or wounds, sore throat, coughing, or sneezing must be reported to the Palermo's sponsor host and shall be restricted from performing any operations which may result in contamination.
10. All visitors must be accompanied by a Palermo's employee during the visit.
11. The PVI host is responsible for making sure the visitor signs out and escorts the visitor out of the building.
12. Visitor/Contractor must read and sign Palermo Safety Policy.

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13. Visitors that enter/work in production areas must wear the appropriate blue colored hairnet and frock designated for their job.

14. No cameras, cell phones, or video equipment are allowed in the plant.

15. Contractors that bring equipment or tools for use in plant must get prior approval by Quality Assurance prior to use. No personal items are permitted in production areas. No glass permitted in building.

16. Drivers are allowed to inspect their truck load on the warehouse dock in their designated bay while accompanied by warehouse employee.

17. Smoking is permitted outside only in designated areas.

18. Do not wear frocks into the lunchroom, washroom, café, or outside of the building. Hang frocks on provided hooks in each designated area.

19. Hands must be washed and sanitized as you enter the processing areas in the plant and anytime hands become unsanitary.

20. No food, gum, or candy is allowed.

G. Maintenance:

- Maintenance Mechanics shall be trained in and follow GMP policy
- Flow of maintenance personnel to maintain sanitary conditions shall be as followed:
 - Maintenance personnel shall initially enter the building through employee entrance located on the west side of the building
 - Mechanics shall wear the uniform provided by the company and change clothes in the plant daily
 - Maintenance personnel shall wear blue maintenance jackets when entering any production area. Jackets are provided by the company and are washed and maintained by the uniform company.
 - At the end of the day, maintenance personnel will change back into street clothes.
 - Maintenance personnel shall exit the building without passing through any production area.
- Containment of foreign materials to the maintenance shop shall be conducted as follows:

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- Upon completion of any task creating foreign material, mechanic shall inspect and remove any foreign material from their uniform.
- Mechanical shall wash dirt, grease, and other chemicals from their hands in the workshop before exiting the shop.
- Mechanic shall step upon sticky mat (change as needed) upon exiting the shop.
- Containment of foreign materials and contamination from tools and tool bags/boxes
 - No tool with wooden handles are allowed in any production area.
 - No rusty tools can be used.
 - Tools are to be stored and carried in a hard surfaced (metal or plastic) container that can easily be sanitized. Fabric tools pouches are unacceptable.
 - Any tool that comes in direct contact with the floor needs to be sanitized.
 - Tools need to be wiped down (sanitized) before being used on a food contact surface or adjacent surface.
 - Tools used in unsanitary environments, drains, toilets, etc. may not be used in production.
 - Never place new or used parts, scrap, tools, or supplies on or any part of equipment that comes in contact with food or packaging.

H. Sanitation:

- Designated personnel must wear; red frocks-hairnet-beard-net-hearing protection-safety glasses –non-slip shoes and green bump hat. Appropriate PPE for the production in this function in order to clean up the cardboard cases and totes that are emptied during processing and take it to the bailer. The employee is also responsible for removing empty pallets from the processing floor. The employee is restricted from contact with food or food contact surfaces. If cross contamination occurs, the employee must notify Area Lead, Supervisor, or Production Manager. The line would stop, an evaluation will be performed, and disposition decision will be made. Disposition may include product disposal and sanitation.

1. As needed: Collection

- a. Collection of recyclable material in designated gray/cardboard totes to the bailer for compacting.
- b. Collection of unrecyclable debris to trash compacter
 - Collection of food debris designated for animal feed
 - Sweeping is conducted by line employees during downtimes or anytime the floor would become cluttered. Food contact gloves will not be worn when sweeping. The employees should sweep away from the production line to

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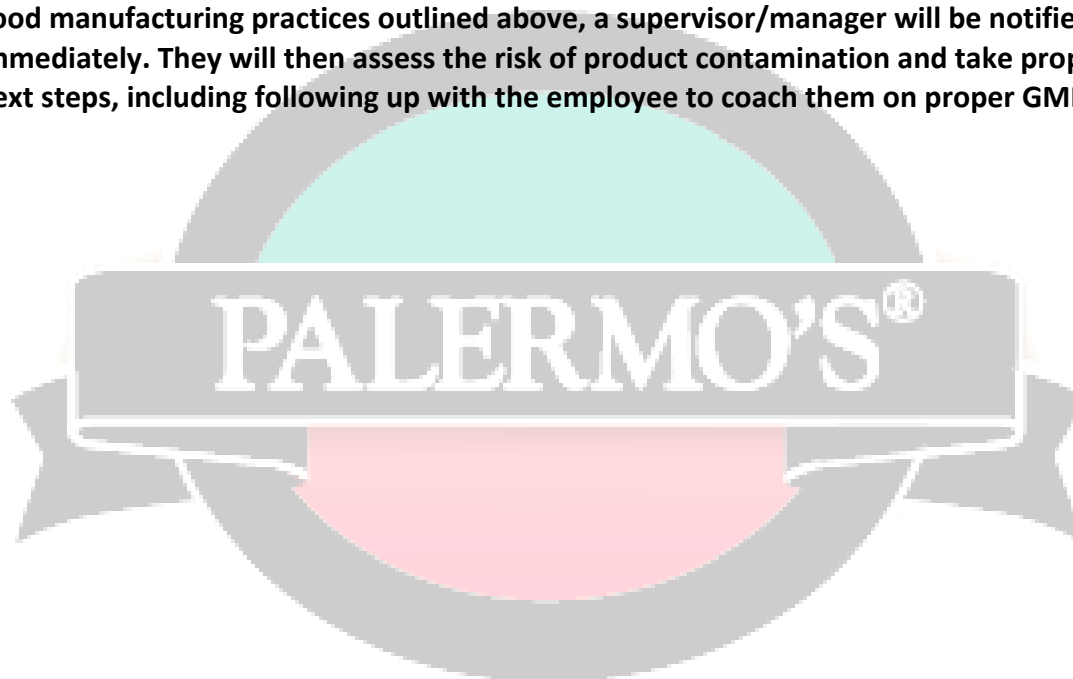
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avoid the potential of foreign material contamination. Following sweeping, employees must wash hands and put on a clean pair of gloves, (sleeves, and apron (optional) before contacting food or food contact surfaces. Designated sanitation team members.

- I. **Health Security – All visitors and employees with allergies to eggs, milk, soy, or wheat must disclose this to the Palermo’s sponsor host for their protection.**
- J. **Corrective Action – Should a product contamination concern arise from not following good manufacturing practices outlined above, a supervisor/manager will be notified immediately. They will then assess the risk of product contamination and take proper next steps, including following up with the employee to coach them on proper GMPs.**



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Revision History		
Date	Summary of Change	Initials
06/24/2022	Linked QA.138, QA.136 and MT.004 to create new document	ECF



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