



## Our Policy Statement

Organizational Responsibility: Our facility has a long history of producing quality and safe products. The food safety responsibilities of all individuals at all levels of the organization are outlined and documented to ensure that the authority and accountability of all quality and food safety decisions are well understood.

1. Critical Food Safety Elements: Our food safety program ensures compliance with the following critical food safety elements: HACCP, allergen management, crisis management, foreign object control, good manufacturing practices (GMPs) and pest management.
2. Regulatory: Our company ensures that all products and processes are in compliance with applicable regulatory requirements. These include areas such as ingredients, labeling, net weight, pesticide and chemical residues, flavor regulations and any local, country-specific, certification requirements. We ensure that all identity-preserved products, including organic, halal, kosher, and gluten-free certified products, are manufactured in accordance with their applicable regulations and standards.
3. Food Defense: It is the responsibility of the operation to plan, design, implement and maintain a comprehensive facility defense plan to ensure our products are safe for human consumption. A facility defense plan is implemented by the plant, facility in accordance with the baseline standards. It includes periodic reviews of effectiveness and is updated, as necessary.
4. Product Design: All our products, processing equipment and facilities are designed, developed, and commercialized in a manner that enables our manufacturing site to produce product that is safe, legal, and fit for human consumption. Research and Development are responsible for ensuring processes and products meet all regulatory requirements and are designed to be safe for human consumption. Equipment design and procurement must meet all standards for GMP compliance and sanitary design.
5. Manufacturing: Our facility is committed to the manufacture of products that are safe and fit for human consumption. We achieve this by ensuring the process is controlled, raw materials are managed appropriately, and the finished product is handled correctly. Manufacturing includes the following equipment process controls: Conformance to specification, equipment preventative maintenance, calibration, equipment verification, start-up, and change-over operation. The following programs manage ingredients, in-process materials, and finished goods: Product traceability, inspection and testing procedures, incoming raw material and packaging controls, water quality, packaging quality, control of non-conforming product, product rework and review and approval of variances. Our warehouses are routinely assessed, approved, and monitored.
6. Documentation and Records: Our facility ensures that all documentation and records are compliant to government regulations and the Food Safety Policy. This includes a defined master list of documents and assigned responsibility for managing documents. Records are maintained to demonstrate compliance with manufacturing specifications and policies.
7. Supply Quality: All purchased ingredients are procured against an approved specification from an approved vendor facility. Suppliers must pass a rigorous approval process. Manufacturing only receives raw ingredients from approved suppliers. Supplier performance is routinely monitored, recorded, and reassessed.
8. Auditing and Self Assessments: Our facility has an established framework in which it executes random yearly food safety audits of manufacturing and suppliers. These audits provide assessments of manufacturing facilities for compliance, effectiveness, and improvement in accordance with our food safety policies and procedures.
9. Corrective and Preventive Action: Corrective and preventative actions are initiated in response to non-conformances that may occur relative to process, product, or package specifications. Effectiveness is verified by the prevention of recurrences. The corrective action program includes



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effective and timely handling of consumer / customer complaints, root cause analysis, audits for program effectiveness and follow-up investigations.

10. Training: Each department identifies training needs and provides on-the-job training for all employees including full-time, part-time, temporary and for contractors. This ensures that they have the appropriate level of education, experience, and training necessary to effectively perform the required activities specified in our Food Safety Policy. A training business plan must be established to address food safety training for HACCP, allergen management, GMP's, control of nonconforming product, employee safety, food security and specific job applications.
11. Consumer and Customer Satisfaction: We ensure that procedures are in place to monitor consumer and customer satisfaction. The procedures must provide timely and accurate responses to customer complaints and strive for continuous improvement.
12. Food Safety Objectives: Todd's is committed to providing the safest food possible and to do this we have food safety objects to ensure we are always striving to improve. Our current food safety objectives are:
  - Allergens – Ensure that there is no cross-contact. Ensure that all storage of allergens is segregated and like over like.
  - GMPS – Ensure that GMPs are being followed by completing monthly GMP audits.
  - Sanitation – Ensure that the master cleaning schedule is being completed daily, have quality control sign off