CERTIFICATE

WQS, LLC., accreditation ID#1226 certifies that, having conducted an audit

At **Sambazon do Brasil Agroindustrial Ltda.**
Site code: 1258284
Rodovia Salvador Diniz, 1500. Zip code: 68.926-300, Santana/AP
Brazil

Has achieved Grade: **AA**

Meets the requirements set out in the

GLOBAL STANDARD For FOOD SAFETY ISSUE 8: AUGUST 2018

For the scope of activities: Pasteurization of açai pulp, clarified açai, concentrated clarified açai, açai sorbet and mixed drink of açai and guarana using following packages: plastic bags, plastic films, plastic pots and bucket.

Including voluntary modules of: VM – FSMA Preventative Controls and FSVP Preparedness.

Exclusion from scope: None

Product categories: 07

Auditor number: 21788

Audit programme: Announced

Date(s) of audit: 2021-11-16 to 2021-11-19

Certificate Issue date: December 30, 2021

Re-audit due date: from: October 25, 2022 **to:** November 22, 2022

Certificate expiry date: January 03, 2023

Authorised by Deise Tanaka

#1226
ISO/IEC 17065
Product Certification Body

WQS, LLC
Quail Plaza 7621 Little Avenue, Suite 200 – Charlotte, NC – 28226
brc@wqscert.com | www.wqscert.com | This certificate remains the property of WQS

Costco GFSI Addendum V2.5.2

General Information	
Supplier Name:	SAMBAZON DO BRASIL AGROINDUSTRIAL
Facility Name:	Santana, AMAPÁ unit
Street Address:	Rodovia Salvador Diniz, 1500
City:	Santana
State/Province:	Amapá
Country:	BRAZIL
Postal Code:	68926-300
Facility Contact Name:	Alexandre Souto Cardoso
Title:	Quality Manager
Email:	alex@sambazon.com.br
Phone:	+ 55 96 3283 0876
EFA Request Number:	
Audit Type:	Costco GFSI Addendum
Auditor Name:	Carlos Ribeiro
Audit Company:	WQS LLC
Audit Dates:	November 16th to 19, 2021
Announced? (Yes/No):	YES
Total Number of Hours On Site:	32
Number of Hours With Records:	18
Number of Hours In Facility (Interior/Exterior):	14

Facility Profile	
Facility Description:	Company founded in California, settled in Brazil in 2006. This is the first plant of 2 that the company has in Brazil. The purpose is to use organic açai coming from sustainable producers. The plant operates 6 days a week, receiving most of the fruit at its own port from ships coming from the rivers of the Amazonic delta.
Facility Established:	March 2006
Facility Square Feet:	62431
Number of Employees:	130
Products Produced At This Facility:	Açai bowls with banana and other fruits
% of Facility Production For Costco:	1,5

Score Summary			
	Points Awarded	**Points Possible**	**Category Score**
Total Score -	**55**	**55**	**100%**
Critical Questions -	**0**		
Audit Result	**PASS**		
CAP Required?	**No**		

Audit Participants			
Name	**Job Title**	**Email**	**Phone Number**
Alexandre Souto Cardoso	Quality Manager	alex@sambazon.com.br	+ 55 96 3283 0876
Mauricio Návega Castro	Plant Manager	mauricio@sambazon.com.br	+ 55 96 3283 0876

Costco GFSI Addendum - Questions

Section Name	Section #	Question Text	Allowable Answers	Answer	Notes (required for a score of 4,3,2,1,0,N/A)
Product Changes					
Product Changes	1.1.1	Are there any changes to the products sold, or the countries sold to, from the facility registration information? If so, please enter the changes in the notes field.	Yes, No	No	
Facility Information					
Facility Details	2.1.1	USDA Facility Number (If applicable):	NARRATIVE	USE NOTES	
Facility Details	2.1.2	Laboratory Facility Capabilities (Physical, Analytical/Microbiological):	NARRATIVE	USE NOTES	
Facility Details	2.1.3	HACCP Certified? List name and position	Yes, No	Yes	
Facility Details	2.1.4	~If Yes where was the class taken?	Classroom, Internet	Classroom	
Facility Details	2.1.5	~Certificate Expiration Date(s):	NARRATIVE	USE NOTES	
Facility Allergens Information	2.2.1	Cereals containing gluten (wheat, rye, barley, oats, spelt, kumat or their hybridized strains) and products thereof	Yes, No, N/A	Yes	
Facility Allergens Information	2.2.2	Buckwheat and products thereof	Yes, No, N/A	No	
Facility Allergens Information	2.2.3	Fish and products thereof	Yes, No, N/A	No	
Facility Allergens Information	2.2.4	Crustaceans and products thereof	Yes, No, N/A	No	
Facility Allergens Information	2.2.5	Mollusks and products thereof	Yes, No, N/A	No	

Facility Allergens Information	2.2.6	Eggs and products thereof	Yes, No, N/A	No	
Facility Allergens Information	2.2.7	Peanuts and products thereof	Yes, No, N/A	No	
Facility Allergens Information	2.2.8	Soybeans and products thereof	Yes, No, N/A	No	
Facility Allergens Information	2.2.9	Milk and products thereof	Yes, No, N/A	No	
Facility Allergens Information	2.2.10	Tree nuts and products thereof	Yes, No, N/A	No	
Facility Allergens Information	2.2.11	Celery and products thereof	Yes, No, N/A	No	
Facility Allergens Information	2.2.12	Lupin and products thereof	Yes, No, N/A	No	
Facility Allergens Information	2.2.13	Mustard and products thereof	Yes, No, N/A	No	
Facility Allergens Information	2.2.14	Sesame seeds and products thereof	Yes, No, N/A	No	
Facility Allergens Information	2.2.15	Sulphur dioxide and sulphites at concentrations of more than 10 mg/kg or 10 mg/liter expressed as SO2	Yes, No, N/A	No	
Addendum Questions					
Addendum Questions	3.1.1	**THE REQUIRED REGISTRATION FOR THE BIO- TERRORISM REGULATION IS CURRENT AND VERIFIED. (THIS APPLIES TO VENDORS THAT MANUFACTURE AND IMPORT TO THE U.S.)(SUPPLIER MUST SHOW REGISTRATION)**	Yes, No, N/A	Yes	
Addendum Questions	3.1.2	**EFFECTIVE AUGUST 30, 2015 FDA ISSUED REGULATIONS REGARDING HARPC. REFER TO WWW.HARPC.COM TO SEE WHEN THIS REGULATION WILL APPLY TO YOUR FACILITY. (HAZARD ANALYSIS RISK-BASED PREVENTION CONTROLS) PRONOUNCED ("HARP SEA") IS AVAILABLE AND FOCUSES ON FOOD SAFETY HAZARDS REASONABLY LIKELY TO OCCUR. THIS HAS BEEN COMPLETED FOR EACH STEP IN THE PROCESS.**	Yes, No, N/A	Yes	The site has an implemented HARPC system with determined preventive controls.

Addendum Questions	3.1.3	**FACILITY TAKES CORRECTIVE ACTION WHEN CRITICAL LIMITS ARE NOT MET.**	5, 4, 3, 2, 1, 0, N/A	5	Evidenced the corrective actions established in the HACCP plan for both critical control points established (Pasteurization and filtering)
Addendum Questions	3.1.4	**WATER IS FROM A MICROBIOLOGICALLY POTABLE SOURCE AND IS ON A DOCUMENTED TEST SCHEDULE. WATER FROM MUNICIPAL SOURCES ARE TESTED ANNUALLY AND WELL WATER IS TESTED QUARTERLY (WHEN APPLICABLE)**	5, 4, 3, 2, 1, 0, N/A	5	The water used by the site is from a well which is monitored by the site´s laboratory according the Brazilian legislation. Complete microbiological and physicochemical analysis are carried out . Last complete test carried out at EUROFINS laboratory on in 2021-07-17, report number 122541/2021.0.A .
Addendum Questions	3.1.5	**A WRITTEN INTEGRATED PEST CONTROL PROGRAM (IPM) HAS BEEN ESTABLISHED. THE PROGRAM UTILIZES A LICENSED DESIGNATED PEST CONTROL OPERATOR* (PCO) AND INCLUDES SCHEDULED FREQUENCY OF SERVICE AND A CURRENT MAP (UPDATED AS NEEDED BUT AT LEAST ANNUALLY) SHOWING THE LOCATION AND TYPE OF ALL PEST CONTROL DEVICES (INTERNAL AND EXTERNAL). THE PROGRAM INCLUDES RESPONSIBILITIES FOR BOTH IN-HOUSE PERSONNEL AND CONTRACTORS. (*CAN BE AN INTERNAL PCO OR A CONTRACTED PCO). THE PROGRAM COVERS THE FACILITY, INSIDE AND OUT, AND STORAGE AREAS FOR PRODUCT AND PACKAGING AREAS IS IN PLACE. PEST CONTROL DEVICES, INCLUDING ILTS, ARE LOCATED AWAY FROM EXPOSED FOOD PRODUCTS, PACKAGING AND RAW MATERIALS. BAIT STATIONS AND OTHER PESTICIDES ARE LIMITED TO OUTSIDE USE. RECORDS ARE KEPT. DURING THE AUDIT, BAIT STATIONS SHOULD BE RANDOMLY CHECKED BY THE AUDITOR UNLESS PROHIBITED BY STATE OR LOCAL LAW.**	5, 4, 3, 2, 1, 0, N/A	5	The site has determined that Pest Control is a preventive control . The company AGROQUALITY is contracted for pest control puposes and frequencies of inspections are based on risk. Evidenced the updated map of external baits stations as well as the internal stations (of glue stripes). The last records of inspections (November 2021) were evidenced.
Addendum Questions	3.1.6	The facility is using X-ray or metal detection for foreign material control. If the risk in your facility is deemed low, a device will not be required. If the risk level is medium to high, you will be required to install a foreign material detection device, preferably x-ray. When adding or replacing equipment for foreign material detection, Costco would like all suppliers to consider an x-ray device.	5, 4, 3, 2, 1, 0, N/A	N/A	No X ray or metal detector. The process has a filter that constituted a CCP previous product packing.
Addendum Questions	3.1.7	Regular checks are documented at least every 2 hours, to confirm the foreign material detection device is continually operating correctly. The units will be challenged against Ferrous (iron), Non-Ferrous (non iron), and Stainless Steel contaminants.	5, 4, 3, 2, 1, 0, N/A	N/A	
Addendum Questions	3.1.8	All foreign detection devices have a proper rejection device i.e. belt stops, air-jet etc.	5, 4, 3, 2, 1, 0, N/A	N/A	

Addendum Questions	3.1.9	**Foreign Material Comments:** Costco will expect all foreign material devices to be challenged by the auditor regardless if they are being used for Costco product or not. On the rare occasion when the device count exceeds 5 units Costco will expect that a minimum of 30% of the remaining devices be checked. Certain industries may be exempt from the requirement to have foreign material devices (i.e. shell eggs, and any fluid processing, whole muscle meat processors). Sites without x-ray or metal detection will be evaluated by the auditor for risk level and discussed by phone with Costco personnel In the event you have been required to install a foreign material device, Costco will expect photo documentation of your installed device and your Foreign Material program emailed to the Costco Food Safety Department within 120 days (FSA@Costco.com)	NARRATIVE	USE NOTES	No X ray or metal detector. The process has a filter that constituted a CCP previous product packing. Filter was requested to open and inspected during the premises visit.
Addendum Questions	3.1.10	All employees must wear a hairnet when working around exposed product. If workers have facial hair, Costco requires that all facial hair be covered when processing Costco product. Beard nets are to be worn and will cover both beard and moustache. Costco does not view a ball cap as a hair cover or hair restraint. If a ball cap or other head covering is worn, it must be covered by a hair net. If head-covering (i.e. sunhat) is to large to be covered by a hair net, a hair net MUST be worn underneath the head covering.	5, 4, 3, 2, 1, 0, N/A	5	Hairnets and masks used at all points where product is exposed.
Addendum Questions	3.1.11	Costco will require vendors who produce high risk items, as well as Kirkland Signature Food and Pet items, to have a documented Environmental Sampling Program (based on target pathogens of concern). The Environmental Sampling Program should be robust and must include sample frequency, site selection, test results and corrective actions. Sampling frequency and site selection must be based on a risk assessment of the facility and product involved. If positive test results are obtained (presence/indicator of target organism), full details of the cause analysis, corrective actions and retesting results must be available for review by Costco Food Safety upon request. The following items are an example of what are identified as high risk: -Fresh produce vendors with production and storage facilities where water is introduced (wash step, high humidity storage, wet cleaning processes, etc.) -Vendors producing foods that are ready to eat, foods that don't need any further cooking, or foods that provide a place for bacteria to live, grow and thrive (i.e. sliced lunch meats, dairy products, cooked meat and fish, frozen fruits and vegetables, cut salad mixes, baby leaf salads, cut fruit, prepared vegetable trays, and cantaloupe).	5, 4, 3, 2, 1, 0, N/A	5	The site has na environmental monitoring program which was verified during the audit that comprises pathogens and other microrganisms.

Addendum Questions	3.1.12	Costco will require vendors who produce high risk items (See above), as well as all Kirkland Signature Food and Pet items to have a documented Finished Goods Microbial Test and Hold Program in place. The test program should include a robust sampling plan developed by the food safety staff that is designed to detect the pathogens of concern.	5, 4, 3, 2, 1, 0, N/A	N/A	The products are not considered High Risk . On the other hand, all products have a program of microbiological control for final release of each batch, including spoilage and pathogenic microrganisms.
Addendum Questions	3.1.13	Costco requires that suppliers show that traceability exercises were conducted twice during the year in two of the following three areas: finished good item, raw ingredient, and primary packaging. For the area not covered during the two previous exercises, it will be the subject of an onsite exercise initiated by the auditor. COMMENT: The on-site traceability exercise will be used to assess the effectiveness of the product recall program. The traceability exercise program must include the distribution of specific product lots, raw ingredients, and primary packaging. The exercise will be conducted on a random item chosen at the auditor's discretion (the scope will include one step forward one step back capability). If the facility is not yet producing for Costco, an item similar to what would be supplied to Costco should be chosen. The system must be able to account for 100% of the product in a 2 hour timeframe. Companies with corporate generated recall systems in place need only provide the auditor with a copy of their program and a sample mock recall or trace back exercise. For non year-round operations, Costco requires a mock recall/traceability exercise once a year in addition to having one during their Food Safety Audit. *The exercise will be conducted on a Costco item chosen at the auditor's discretion.	5, 4, 3, 2, 1, 0, N/A	5	A complete traceability test was carried out with a of sorbet code SBIH 21.275-AP, produced in 2021-07-14, lot 275 dispatched to client Ocean Fair International Group FZE from Emirates. The test was done in 1 hour 35 minutes.
Addendum Questions	3.1.14	Processing facilities must have an Approved Supplier Program in place to approve and monitor their suppliers for all raw materials, ingredients and primary packaging. Costco Vendors must have a current (within one calendar year) third party food safety audit with HACCP Certification, traceability exercise and a product specification sheet which includes product requirements, labeling and code dates for each supplier. Raw material and ingredient suppliers must be operating under a HACCP/PREVENTIVE CONTROLS program. (COA's do not count towards this audit component) Packaging facilities producing primary packaging must have a documented monitoring program to evaluate packaging compliance to specifications, including a method to identify specific lot numbers and a third party audit.	5, 4, 3, 2, 1, 0, N/A	5	The suppliers appovals preventive program was fully audited and implemented . Several examples of approval criteria of suppliers of ingredients and packaging materials were evidenced

Addendum Questions	3.1.15	Costco has a “No Bare Hands” policy- i.e. gloves must be used where there is direct hand contact with ready-to-eat products (all risk levels). The facility must have a written procedure for the proper handling and usage of gloves and must include verification documentation. Reusable rubber gloves must be washed and sanitized frequently, after breaks, and/or after handling potential contaminants. If fabric gloves are used when hands are in contact with food, they need to be covered with an outer non latex, powder free disposable glove. All other types of gloves are to be latex free and powder free. All gloves should always be clean and in good condition. COMMENT: Where it can be demonstrated, through scientifically sound validation studies, that the wearing of gloves is impractical or less hygienic than bare hands, Costco may grant an exception to the glove requirement. These are rarely issued, and are only granted when the product, processes, risk-level, and validation evidence support this.	5, 4, 3, 2, 1, 0, N/A	5	Use of blue nitrile gloves was evidenced at all points were open product is present as sieving and selection.
Addendum Questions	3.1.16	Hand wash stations are appropriately located in the processing areas and include the following; • hands-free water and towel operations (single use or similar drying device) • Liquid soap • warm water (within 15 seconds), waste container • signage in languages appropriate for employees to understand.	5, 4, 3, 2, 1, 0, N/A	5	Hands wash points evidenced as appropriate with hands free taps and paper towel. Liquid soap as well as sanitizer (gel alcohol). Clear signage
Addendum Questions	3.1.17	GFSI Certification – Costco requires the audit company performing your audit to post the preliminary audit results on the Costco database within 7 working days.	*Facility has been notified* Yes, No	Yes	The site is BRCGS certified. BRC site code: 1258284

Corrective Action Plan

Facility Information		Audit Information		CAP Information	
Supplier:	SAMBAZON DO BRASIL AGROINDUSTRIAL	**EFA Request #**		**Total Findings**	0
Facility:	Santana, AMAPÁ unit	**Audit Type:**	Costco GFSI Addendum		
Address:	Rodovia Salvador Diniz, 1500	**Auditor:**	Carlos Ribeiro		
Contact:	Alexandre Souto Cardoso			**Status**	
Title:	Quality Manager	**Audit Company**	WQS LLC		
Email:	alex@sambazon.com.br	**Audit Date(s)**	November 16th to 19, 2021		
Phone:	+ 55 96 3283 0876				

Below are the Corrective Actions that have been identified for your recent audit, based on the non-compliances found by the auditor. Corrective actions plans must be sent to the auditor for approval. Once approve the report will be uploaded by the audit company to EFA.

Section #	Question Text	Answer	Notes:	Corrective Action Plan (Include Date To Be Completed)	Rood Cause Analysis & Preventative Action	Responsible Person (Name & Title)	Auditor Approval	Auditor Approval Date

N/A Critical Questions

Below is a summary of non applicable critical questions.

Section #	Question Text	Rating	Notes:	Critical Question

Assessment Rating System

This rating system describes a food plant's level of compliance with recognized food safety and Good Manufacturing Practices. The point system and definitions are objective guidelines for evaluating the plant's compliance with the assessed standards and are intended to assure consistency in rating.

Comments must be provided for any standard rated lower than 5.

Questions are scored per the matrix, with 5 being the highest rating possible and 0 being the lowest. If isolated issues for any element are found, an additional one point deduction will be applied to the question's rating *OR* if numerous issues for any element are found, an additional two point deduction will be applied to the question's rating.

Number of elements in question	>3 elements missed	3 elements missed	2 elements missed	1 element missed	All elements fulfilled	
>3	**0**	**2**	**3**	**4**	**5**	**Rating given to question**
3	N/A	**0**	**2**	**4**	**5**	
2	N/A	N/A	**0**	**3**	**5**	
1	N/A	N/A	N/A	**0**	**5**	

Definitions:

Single issue - One observation, occurrence or instance of a specific/same issue or element
Isolated issues - Two observations, occurrences or instances of a specific/same issue or element.
Numerous issues – Three or more observations, occurrences or instances of a specific/same issue or element.

This rating system is an objective guideline. Auditors may use their discretion regarding scoring, considering the severity of food safety issues and numbers of observations of an issue noted.

Please follow the dropbox link below for the most current versions of Costco documents and templates:
https://www.dropbox.com/sh/wg8ftlntk4fo318/AABKABKUnMyTOqS8RhJL-jHUa?dl=0

If you are experiencing issues with this template, please contact FSA@costco.com

Business License

Please insert a copy of the facility's legal business license for the city it operates in.

GOVERNO DO ESTADO DO AMAPÁ
SECRETARIA DE ESTADO DA SAÚDE
COORDENADORIA DE VIGILÂNCIA EM SAÚDE
DIVISÃO DE VIGILÂNCIA SANITÁRIA DE SANTANA

ALVARÁ SANITÁRIO

2021

Nº: 113/2021

A DIVISÃO DE VIGILÂNCIA SANITÁRIA DO MUNICÍPIO DE SANTANA, de acordo com a legislação vigente e tendo em vista a regularização funcional da Empresa: SAMBAZON DO BRASIL AGROINDUSTRIAL LTDA, CNPJ Nº: 07.294.662/0001-60, com Nome de Fantasia: SAMBAZON DO BRASIL, com sede a: ROD COMANDANTE PEDRO SALVADOR DINIZ N*1500, no Bairro: IGARAPE DA FORTALEZA, no Município de: SANTANA, e tendo a(s) atividade(s) de FABRICAÇÃO DE SORVETES E OUTROS GELADOS COMESTÍVEIS, concede ALVARÁ DE LICENÇA SANITÁRIA para o exercício de 2021.

Santana/Ap, 16 de MARÇO de 2021.

WEIKY PONTES MORAIS
Chefe do Departamento de
Vigilância Sanitária
Decreto nº 0407/2021-GAB/PMS

CHEFE DESTA DIVISÃO DE VIGILÂNCIA SANITÁRIA

Obs.:

Data de Validade: 31/12/2021

A Licença de Funcionamento é valida para o ano de sua expedição. Pode, entretanto, a qualquer tempo, ser recolhida pela autoridade competente, em caso de infração a legislação sanitária vigente.

Licença de Funcionamento Impressa pelo Administrador deste Sistema

Data e Hora da impressão: 16/03/2021 11:10:21

Audit Report

1.Audit Summary			
Company name	Sambazon do Brasil Agroindustrial Ltda.	Site Code	1258284
Site name	Sambazon do Brasil Agroindustrial Ltda		
Scope of audit	Pasteurization of açai pulp, clarified açai, concentrated clarified açai, açai sorbet and mixed drink of açai and guarana using following packages : plastic bags, plastic films, plastic pots and bucket.		
Exclusions from scope	None		
Justification for exclusion	NA		
Audit Start Date	11/16/2021	Audit Finish Date	11/19/2021
Re-audit due date	11/22/2022	Head Office	No

Additional modules included			
Modules	Result	Scope	Exclusions from Scope
FSMA Preventative Controls and FSVP Preparedness	Passed	Pasteurization of açai pulp, clarified açai, contrate clarified açai, açai sorbet and mixed drink of açai and guarana using following packages : plastic bags, plastic films, plastic pots and bucket.	None

2. Audit Results					
Audit result	Certificated	Audit grade	AA	Audit type	Announced
Previous audit grade	AA	Previous audit date	12/11/2020		

2. Audit Results

Certificate issue date	12/30/2021	Certificate expiry date	1/3/2023

Number of non-conformities	Fundamental	0
	Critical	0
	Major	0
	Minor	4

3.Company Details

Address	Rodovia Salvador Diniz, 1500 Santana Amapá 68926-300		
Country	BRAZIL	Site Telephone Number	+55 96 3283 0876
Commercial representative Name	Miguel Lanzuolo	Email	Miguel.lanzuolo@sambazon.com.br
Technical representative Name	Alexandre Cardoso	Email	alex@sambazon.com.br

4.Company Profile

Plant size (metres square)	<10K sq.m	No. of employees	51-500	No. of HACCP plans	4-6

Shift Pattern	1 main shift of 80 people; second shift of 40 people
Subcontracted processes	No

4.Company Profile

Other certificates held	Halal, Kosher, Organics (BR, US and EU) and Fair Trade
Regions exported to	North America South America Europe Oceania Asia
Company registration number	MAPA #000029-9
Major changes since last BRCGS audit	No major changes since last audit

Sambazon INC. was founded in 2000 by Ryan Black, Jeremy Black, Edmund Nichols to sell açai juice to convince juice bars in Southern California that acai was the real deal. By the end of that first summer, over 50 juice bars were selling acai smoothies and Sambazon started expanding all over the country. In Brazil, Sambazon have been working with the local non-governmental organizations ("NGOs") to build the supply of organic and sustainable açai. Over 10,000 people in the Amazon help Sambazon to harvest açai through our certified organic program (processed fruit is 100% organic). The company operates 2 production sites in Brazil, being one of the largest acai processing company in the country. The site with registration in the Ministry of Agriculture, Livestock and Supply (MAPA #000029-9) consists in a facility to receive acai berry, extraction of puree and processing to obtain derivatives such as mixed drinks, sorbets and clarified acai. The company has high technology equipment, operations and facilities to maintain the cold chain (frozen products) and ensure the quality and safety of products. The site started its activities in March 2006 and works 02 production shift 06 days per week. Capacity of production is 120 ton. acai berry/day. The industrial manager is responsible for decisions in the site. This audit was carried out before due date.

5.Product Characteristics

Product categories	07 - Dairy, liquid egg VM - FSMA Preventative Controls and FSVP Preparedness

5.Product Characteristics

Finished product safety rationale	Pasteurization temperature: 80°C (minimum); Products pH: 3.10 to 4.50; Frozen products storage: ≤ -18 ºC				
High care	No	High risk	No	Ambient high care	No
Justification for area	Stable products by pH and acidity, low risk according to BRCGS decision tree				
Allergens handled on site	Cereals containing gluten				
Product claims made e.g. IP, organic	Halal, organic, Kosher				
Product recalls in last 12 Months	No				
Products in production at the time of the audit	Pasteurized açai pulp, and açai sorbet				

6.Audit Duration Details

On-site duration	32	Duration of production facility inspection	16
Reasons for deviation from typical or expected audit duration	The BRCGS Calculator defined 28 hours, but the audit was performed on 32 hours due the combined audit with Costco Addendum. The 32 hours was completed, due only 20 minutes was used for lunch time.		
Next audit type selected	Announced		

Audit Duration per day

Audit Day	Date	Start Time	Finish time
1	11/16/2021	8:00	17:30
2	11/17/2021	8:00	17:30
3	11/18/2021	8:00	17:30
4	11/19/2021	8:00	13:00

	Auditor number	Name	Role
Auditor Number	21788	Carlos Alberto Ribeiro	Lead Auditor
Second Auditor Number			

Present at audit

Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings (ref: clause 1.1.11)

Name/Job Title	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
Mauricio Castro / Operation director	X	X		X
Alexandre Souto / Quality Manager	X	X	X	X
Ricardo Silva / Production Supervisor	X	X	X	X
Liliane Fretias / Compliance Analyst	X	X	X	X

GFSI Audit History

Date	Scheme/Standard	Announced/Unannounced

Non-Conformity Summary Sheet

Critical or Major Non Conformities Against Fundamental Requirements				
No	Clause	Detail	Critical or Major	Ant. re-audit date

Critical			
No.	Clause	Detail	Ant. Re-audit date

Major							
No	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

Minor							
No	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by
1	3.9.3	During traceability exercise, conduction of mass balance for ingredient “granola” lot 20522A25, it was appointed result of 200 units for disposal, but this quantity was not calculated through registers of loss. It was calculated by suppose related of absent quantity against total received (17000).	Perform correct fills in register form about loss of ingredients during operations.	Implement registers of loss of ingredient considering difference of products category. Training employees in registers fills.	Not suitable form to register lost of ingredients.	12/14/2021	Carlos Ribeiro
2	4.4.1	It was verified wall with peeling paint next of drum package.	Repair of paint in package room.	A maintenance employee was designated for inspections and repairs of property facilities.	Not suitable frequency and criteria of facilities inspection in package room.	12/14/2021	Carlos Ribeiro

Minor							
3	4.4.2	It was verified the water drained channel on the side of the control panel in the pasteurization room with parts of the floor covering coming off. This non-compliance is the same as in the previous audit, but on the other side. NC not appointed in chapter 01, as the coating was carried out completely, and a recent release with warranty plan was developed by the service provider.	Performed re-application of material according planned with responsible company in compliance with guarantee.	To correct floor preparation for next annual reforms.	Failure in floor preparation of material application.	12/14/2021	Carlos Ribeiro
4	4.15.1	It was verified allergen storage in excusive room, but without suitable distance with walls.	Re-organization of area, keeping suitable distance of walls.	Failure in compliance with GNP rules.	Training responsible and do periodical inspections.	12/14/2021	Carlos Ribeiro

Comments on non-conformities
Comments

Additional Modules / Head Office Non-Conformity Summary Sheet

Critical			
No	Clause	Detail	Re-audit due date

Major							
No	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

Minor							
No	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

Detailed Audit Report

1. Senior management commitment

1.1 Senior management commitment and continual improvement

Quality Manual: MAN-MSGQSA rev20 of 2021/10, signed by Operation Director and Quality Manager. The Quality and Food Safety Manual includes the Quality Management process directives, food safety plan directives and program of pre-requirements.

The Quality and Food Safety Policy is described in Annex 4.0 – AP of MSGQSA rev18 of 2021/09. The policy includes compliance with legal requirements, client´s satisfaction, compliance with specifications and organic certification, authenticity, commitment with ethical and solidary commerce, capacitation of staffs and continuous improvement. Policy is suitable communicated for employees though banners and trainings.

Objective are described in same annex of policy and contemplation indicators relative to food safety, quality, client´s satisfaction, employee's capacitation and legal requirements as:

•Deviation of CCP´s without management: target = 0; no deviation in last quarter

•PRP´s inspections: target > 70%; verified satisfactory results from June and August 2021.

•Hazard found internally: 5/year per hazard classification; no deviation in last quarter

•Attendance of products specification: products release without items out of specification; no deviation in last quarter

•Complaints: <0,06% per year (quantity/tons): 2 complaints in the last quarter

•Legal: absence of infringement notice (by regulatory agencies): no deviation in last quarter

Quarterly meeting used to review indicators and targets. Verified last quarterly meetings

System Review: according quality manual, system review is performed at least annually and includes all entrances requested by BRCGS. The annex 3.0-AP rev05 establishes the meetings timescale for 2021, which includes monthly meeting (quality, food safety, authenticity and legality), quarterly (monitoring of indicators and targets of FSQMS) and (complete FSQMS system review). Last system review dated 2021-01-21.

Food Safety Culture: There is a food safety culture plan described in annex 8.0 of quality manual – rev03 of 2021/11. The food safety culture plan contemplates a week dedicated for

specific activities for food safety conceptions; attendance to training recycling; weekly dialogs with themes about 5S and food safety and trading for leaders. It was verified invite folder of food safety week and records of activities.

Confidential complaints: channels are established for denunciation and internal complaint though e-mail, WhatsApp, SMS and phone. There is identify the responsible staffs for this attendance. There is a folder received by each employee and it is described that the person does not need give it identification. There is also a box close to canteen for more security of confidential communication.

There are sufficient resources to maintain and continually improve the FSQMS. It was reviewed investments for period 2020/2021 through document CAPEX (rev00 of May 2021). With total of investments planned for of US$ 419.000 for structural improvements and maintenance, new equipment for sorbet, quality consulting, trainings, laboratory and others.

The company has annual subscription on the website www.alimentosonline.com.br, which sends monthly to Quality Team all relevant legislation, updates and provide articles and training pertinent to the science and food technology area. It is also discussed in the management meetings monthly. Documents are listed in specific master list for legislation documents (annex 4.16-P reviewed in September 2021). Besides, the site receives information of legal issues from its headquarters in USA. Evidenced the inclusion of the IN #88 of March 2021 of ANVISA, related to maximum limits of residues. The company uses a BRCGS participate for BRCGS actualization.

It was evidenced original hard copy and electronic version of the current BRC standard available with Quality Team.

This audit was planned and executed according the due date established in the current certificate. It was carried out completely on site.

The senior management were present at the opening and closing meetings. Managers and responsible involved were available, when necessary, during the audit process.

The 04 minor NCs from the last BRCGS audit have been resolved.

The site is not using the BRCGS logo on product packaging.

1.2 Organisational structure, responsibilities and management authority

Organization structure is described in FSQMS Manual. It includes CFO, General Director, Operation Director, Quality Manager, Production Supervisor and subsequence leaders. It was evidenced matrix of substitutes together the description of Crisis Management Team (updated by October 2021): Maurício Navega Castro (Operations Manager) is replaced by Alexandre Souto (Quality Manager) ; Alexandre Souto is replaced by Antonio Robson (Supervisor Coordinator).

It was reviewed several job descriptions which are documented and available.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification

2 The Food Safety Plan – HACCP

HACCP Team is leaded by Alexandre Souto, Quality Manager, who is chemical engineer graduated in 2000 in the Federal University of Pará and qualified in HACCP by SENAI through training applied in 2017/01/23 to 2017/02/01. The team includes members of production (supervisor, analyst and operators), quality (manager, analysts and laboratory assistants) and maintenance (assistant). The HACCP team is composed by 13 staffs, including coordinator. Evidenced the training for complete tem in 2021-06-08 by third party “SENAI”.

The HACCP scope is defined in the HACCP Manual (Rev. 21of September 2021) including all products manufactured and processes covered (production of frozen acai puree and mixed frozen preparations based on acai puree).

There are and implemented prerequisite programmes: cleaning and disinfection, water potability control, hygiene personal and training, waste management, maintenance, calibration of equipment, pest control, purchasing and control of receiving, control of

foreign bodies, procedure of pre-shipment and transport (review of critical control points and control points). The prerequisite programmes are documented, monitored and integrate the development of the HACCP system which has been developed based on the Codex Alimentarius guidelines (CAC / RCP 1-1969, Rev. 5 of 2020), customer requirements and legislation.

There are 6 HACCP plans documented and divided by types of products manufactured:

•Acai pure (pulp) - AP.01-AP, Rev. 24 of 09/2021 (for industrialized products)

•Acai (mixed drink acai with lemon) – AL01-AP rev00 of October 2021

•Acai sorbet (ABS 01-AP revision 18 of September 2021)

•Acai smoothie pack (mixed drink acai and guarana - original acai) – OA 01-AP, Rev. 24 of September 2021

•Pure Acai 12% of solids AP12% 01-AP revision 23 of September 2021.

•Clarified acai (for unsweetened beverages)- AC-01-AP, Rev. 24 of September 2021

All products are derived from the acai pulp manufacturing process, which consists of the following steps: receiving of fruits, ingredients and packaging, fruits classification, production line feeding, pre-washing, softening, final washing, maceration, pulp extraction, refining, acidification (or not), filtration, pasteurization (CCP1B), cooling, tank storage, final filtration (CCP2F) packaging, storage and shipping.

To obtain the mixed drink acai and guarana, after pasteurization other ingredients are added and homogenized according to the formulations of each product (eg. sugar, soy lecithin, guarana extract, lemon and citric acid) and the product is filtered and packaged in its respective packaging.

To obtain the sorbet, after pasteurization the ingredients of each recipe are also added and homogenized and the syrup is subjected to the aeration and previous freezing process in specific equipment, followed by filling of the packaging and storage.

Clarified acai is obtained through the microfiltration process (by membranes) of the pasteurized acai pulp and the concentrated clarified acai is obtained by the concentration (reverse osmosis) of clarified acai. These stages occur in a totally closed system and the products obtained are immediately packed and stored.

Evidenced description for the products contemplating:

•• Physical-chemical characteristics (pH between 3.10 to 4.50 depending of product); Total solids between 12 to 30% depending of product; Acidity < 0.45g/100g; % Lipids;

Anthocyanin's > 30mg / 100g; Particle size < 400µm; Flavour = characteristic of acai puree; Colour.

•• Microbiological parameters (Total counts of mesophiles ≤ 2000 CFU/ml; Molds and yeasts ≤ 500 CFU/ml; total of coliforms ≤ 10 CFU/ml; E. coli = absence/25g; Salmonella spp. = absence/25g; Trypanosoma cruzi = absence/25g; B. Cereus ≤ 1000 CFU/ ml; S. aureus = absence/50ml.

•• Heavy metals (arsenic ≤ 0.10 ppm; cadmium ≤ 0.05 ppm; lead ≤ 0.05 ppm; mercury ≤ 0.5 ppm).

•• Mycotoxins (Aflatoxins B1 + B2 + G1 + G2 < 10 ppb).

•• Macroscopic and microscopic characteristics (absence of foreign matters indicative of human health risk).

•And intended use, consumer target groups including vulnerable groups (gluten) in one of product, packaging characteristics, shelf-life (18 months for sorbets ad 24 months for other products), sale places and controls of distribution and commercialization.

Evidenced flow diagrams, available in each HACCP Plan, consistent with the production flows verified on site, including process inputs and outputs, from raw materials receipt through to processing, storage and distribution. The flow diagrams were verified and validated in September 20th, 2021 through walk round factory and include the signature of Quality Team members.

Evidenced hazards analysis considering the raw material (açai), ingredients, packaging and process steps contemplating the presence of following hazards: physical (eg. dirt, stones, fragments of plastics, metals and nylon wires), chemical (eg. pesticides, lubricants, residues of cleaning products) and biological (eg, Salmonella sp., E. coli, moulds and yeasts, Trypanosoma cruzi, S. aureus, C. perfringens and Mesophiles). The hazard of listeria monocytogenes was included in the 2020 version of the HACCP plans.

Radioactive hazards are only identified in the water sources and acai fruit, as iodine-131 e Cesium-134 and Cesium-137 and alpha and beta radioactivity from the water sources (Monthly tests of radioactivity on product are carried out for fruit and semester for water). Food fraud and food defence are assessment in specific procedures (See 4.2 and 5.4).

There is a risk matrix for hazard assessment considering the severity and probability of their occurrence. Adequate control measures are described. Intentional contamination at different stages (mainly chemical or physical intentional contaminations) and fraud hazards as non-certified fruit are considered.

The team has used a 5 steps decision tree for identification of 2 CCPs:

•• CCP1 - Pasteurization (control of deteriorating and pathogens microorganisms covered by the product description); Critical limit = Pasteurizer temperature (min. 80 ° C for processing of in natura and min. 70 ° C for reprocessing); speed of frequency inverter (max. 1200 rpm for in natura products and max. 1500 rpm for reprocessing). Monitoring every 1 hour by the production operator; Verification every 2 hours (observation in loco by quality assistants) and daily (check of records by managers).

•• CCP2 - Filtration (control of foreign bodies fragments like plastic, metals, wood, glass and nylon wire); Critical limit: integrity and cleaning of filter (2.0mm); Monitoring 2 times a day (at the start and end of production); Daily verification (observation of records by managers).

Records of the correct monitoring were verified during the audit in the industrial areas and in the traceability test. Corrective actions are defined and aligned with CCP monitors.

•The control points (CPs) were defined: CP1 - Receipt of Fruits (verification of diesel oil contamination); CP2 - Filter before pasteurization step (3mm); CP3 - Cooling after pasteurization (≤ 17 ° C); CP4 - Magnetic trap (verification of integrity, presence of foreign material and of magnetic field min. 1800 gauss); CP5 - Storage in tanks (temperature ≤ 17 ° C).

Validations were conducted for CCPs based on national legislation, FDA requirements, scientific studies, and practice validation.

•• PCC1: Microbiological analysis of the product acai puree were carried out before and after pasteurization (verification of total mesophiles, molds and yeasts and total coliforms): results indicated microbial reduction below the specified limits (conducted in 2016/06/15).

•PCC2: Practical validation with test bodies (> 2.0mm) introduced in the line (conducted in 2016/11/20).

The HACCP plan review occurs annually or when necessary (significant changes). There are verification procedures established to confirm that the HACCP plan, including controls managed by prerequisites programs, continues be effective. This verification is based in monitoring records, results of the GMP and HACCP audits, verification of flow diagram chart and analysis results, all performed according to frequencies established for each activity and the results compiled and analysed in the annually review of HACCP plan. The last revision of all HACCP plans (which were resumed to 6 differentiated plans) occurred along 2021 and record of changes is documented (records of September 2021).

•The documentation and records keeping are sufficient to enable the site to verify that the HACCP controls, including controls managed by prerequisites programs, are completely implemented.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification

3. Food safety and quality management system

3.1 Food safety and quality manual

Quality Manual: MAN-MSGQSA rev20 of 2021/10, signed by Operation Director and Quality Manager. The Quality and Food Safety Manual includes the Quality Management process directives, food safety plan directives and program of pre-requirements.

All procedures and work instructions are clearly legible, unambiguous, in appropriate language (Portuguese) and sufficiently detailed to enable their correct application by appropriate staff. They include the use of photographs and diagrams.

3.2 Document Control

There is a documented program for control of documents and records (PGQSA 16-AP, Rev. 17 of July 2021). This program describes the elaboration, approval, control and distribution of documents.

The documents are controlled by a master list (Annex 2.16-AP, Rev. 11 of October 2021) which informs document code, title, revision date, revision frequency and revision number. The list includes documents (manuals, procedures, work instruction, spreadsheets, check lists and other annexes) and are grouped by programs (e.g. cleaning and disinfection, water

potability control, hygiene personal and training, waste management, maintenance, calibration of equipment, pest control, HACCP etc.). Besides, there´s a documented instruction IT 1.16 for controlling the approval and publication of documents.

The procedure PGQSA 16-AP established the site policies for information back-up (weekly back-up of digital information is required).

3.3 Record completion and maintenance

Records are retained for 5 years (2 years in active archive and 3 years in dead archive) according to the records control procedure (PGQSA 16-AP, Rev. 17 of July 2021).

This procedure defines methods for corrections of hand written errors doing a strikethrough in the wrong item, rewriting the information and signing it (it was verified during audit).

The documentation was showed on time when requested. The records verified during the audit were maintained in good conditions and retrievable.

3.4 Internal audits

The internal audits are conducted according to a schedule (Annex 6.11-AP, Rev. 10 of May 2021). Evidenced the internal audits program comprising all points of the BRC standard along the year. Sections of the BRCGS standard were audited in March, May, July and September.

Following audits were verified:

•March 22nd , 2021; sections 1 and 2 (HACCP). Auditors: Daniel Carvalho and Ricardo Oliveira; 0 non conformities.

•May 25th,2021: sections 3 and 4 of the standards. Auditors: Larissa Cordeiro.3 non conformities were raised. Action plan verified including preventive action after route cause evaluations.

•July 20th, 2021: sections 5, 6 and 7 of the standard. Auditors: Alexandre Souto and Marlindo Trajano. 0 non-conformities.

•2021-09-13 to 15; complete standard internal audit. Carried out by external consultant Rodrigo Bueno Cordeiro; competences of internal and BRC training evidenced; 07 minor non-conformities.

Evidenced the training records on the BRCGS standard of Larissa Cordeiro (2019-02-04; Daniel Barroso (2019-02-05); Alexandre Cardoso (2019-02-05) and Marlindo Trajano (2019-01-25).

The qualification of internal auditors is documented in procedure PGQSA 11, in annexes 8.1AP an updated list (by June 2021) of qualified internal auditors (10 staffs).

There are monthly inspections program performed by internal quality staff to evaluate prerequisite programs (GMP). Last records verified dated of 2021-06-24 and 2021-08-26 were evidenced (template CL 2.11-AP is used), grades 98,18% and 76,38%, respectively. Besides there are daily inspections of GMP and housekeeping.

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw material and packaging

There are procedures for management of supplier (PGQSA 07-AP rev23 of 08/2021) and risk assessment for raw material (acai berry), ingredients and packaging materials is documented in HACCP Plans. Raw materials, ingredients and packing are assessed, and they are classified in high, medium, low risk, regarding the severity and probability of occurrence. Physical, chemical and microbiological hazards, substitution or fraud and allergens were considered in determining the final risk. This risk assessment is reviewed annually. Last risk assessment is from August 2021 (Annex 29.07-AP)

For açai producers (extractive areas), technical -visits are carried out prior to the supply approval and periodic visits (every 3 years) are performed to verify compliance with the company's requirements and management conditions in accordance with the requirements of organic certification. Besides that, the company's organic certification audits cover extractive areas for evaluation and approval of producers.

There is an up-to-date list of approved suppliers of açai with the corresponding date of approval and on-going status of evaluation through technical visits. Producers have to sign a commitment terms contract to assure organic production. Organic and sustainable parameters are taken into account to approve açai harvesters. After the approval, the producers are periodically trained by the company about the practices and care in the harvesting and post harvesting of fruits, personal hygiene and organic production.

Suppliers of inputs (ingredients and packaging) are evaluated through the sending of documentations (ex. registry in regulatory official organs when applicable, licenses, GMP, HACCP or GFSI certifications, procedures, specifications, etc.) and according to followings criteria:

•• Audits on site (every 3 years) according to requirements of check list CL 5.07 - Approval criteria: <50% (disapproved); 50% to 69% (partial approval with need to send action plan and evidences in 60 days); ≥ 70% (total approval with need to send only the action plan).

•• Self-assessments (annually) according to requirements of questionnaire CL 1.07 - Approval criteria: ≤ 40% (disapproved); 41% to 70% (approved with restriction - need to send action plan); > 70% (approved).

•• If the supplier has certification in food quality and safety recognized by GFSI, only the updated certificate is required.

•• For secondary and tertiary packaging suppliers the evaluation is conducted only through the self-assessment questionnaire (annually). It is also applied for low risk supplier.

Evidenced the approval and evaluation of the following suppliers:

•Fruit acai – RCA – Verified commitment letter sign by RCA about organic directives, including buying, loads and delivery and commitment letter from collector "Angela Maria Gomes de Abreu" and also check list of visit performed in 2020-09-03. Organic certificate, including this collector, was verified, issued for Samabazon by Ecocert SA, number 72804/202110071944PM, valid until October 2022.

•Sugar – Native – BRCGS certificate valid until 2022-08-27

•Citric acid – Tate & Lyle – BRCGS certi-ficate valid until 2022-03-03

•Acai natural flavour – Fermininch - FSSC 22000 valid until 2022-08-16

•Sunflower lecithin – AAK Soya – BRC for brokers valid until 2022-01-06 – manufacturing: RiHo Dodewward B.V. – certified FSSC 22000 valid until 2022-08-01

•Natural colorant (blueberry and carrot) – GNT – IFS certificate valid until 2022-03-04

•Tapioc Syrup – Ciranda – Cirand as Agent is certified against organic including commercialization of tapioca syrup (Certificate QAI valid until 2021-12-04); Manufacture: WGC Co. – Certified FSSC 22000 valid until 2024-07-03 (this certified includes in scope syrups, and it was verified in web site of the manufacture that products are obtained from tapioca / cassava raw).

•Plastic pot 200ml – Chamfer – Audit report of second part dated 2019-05-28; grade 80,2%; audited per A.S. (quality manager)

•Granola – Feinkost - Audit report of second part dated 2019-05-20; grade 100%; audited per A.S. (quality manager)

Suppliers of ingredients and packaging are reassessed annually through the self-assessment questionnaire and the company verified licenses and certifications validity, updates of the products specifications, compliance with delivery deadlines and with quality requirements of products. Suppliers who do not meet the requirements within the established standards

will be advised 03 times in writing, then suspended until they make the necessary adjustment. If there is recurrence of noncompliance with the requirements, the supplier will be de-accredited.

No purchasing exceptions established (no raw materials supplied by customers).

3.5.2 Raw material and packaging acceptance, monitoring and management procedures

The raw material, ingredients and packaging are inspected and assessed on receipt in the site as defined in documented procedures PGQSA 07-AP rev23 of 08/2021 and IT 5.07-AP revision 19 of July 2021. It was observed the reception of acai berry during the audit.

All raw material (acai berry) come from contractor's organic producers. Inspections in extractive areas are carried out semi-annually and the fruit receipt is classified as control point of HACCP plan.

There are measures to control inputs acquisition: acquisition by approved suppliers, load, vessel and /or truck conditions.

The fruits are evaluated according to the following criteria:

•• Yield (determines the price to be paid for the load): standard = 45%

•• Color (receipt approval/disapproval criterion): violet purple, dark purple and bordeaux red are approved colors; marginal Bordeaux and brow are disapproved colors.

•• Delivery conditions (check list CL 2.07 rev17 of June 2021): hygiene and conservation conditions, presence of chemical contaminants (eg. fuel, cleaning products, insecticides), "barbeiro" insect (Triatoma infectants), organic segregation, packaging conditions and allergenic.

In the receipt of ingredients, the batch received is sampled for visual evaluation, presence of contaminants, physical-chemical analysis (eg. pH, humidity) and verification of the supplier's quality report (CoA). The packaging approval is based on label evaluation, integrity, presence of moisture, microbiological analysis (coliforms and total bacteria) and verification of the quality report issued by the supplier.

The status of approbation of organic ingredients is registered in spreadsheet PL 4.07-AP.

Evidenced the approval records of the following raw materials:

•Fruit acai – lot FSB21.275-AP- received in 2021-07-14

•Acai natural flavour – lot 1005377821 – received in 2021-01-16 – specification ET-23.07-AP rev01 of July 2020

•Sunflower lecithin – lot SIL45014 – received in 2021-05-04 – specification ET 24.07-AP rev02 July 2021

•Natural colorant (blueberry and carrot) – lot L21522719 – received in 2021-05-31 – specification ET 12.07-AP rev04 of 2021-07

•Tapioc Syrup – lot 0612201 – received in 2021-04-22 – specification ET 20-07-AP rev04 of July 2021

•Plastic pot 200ml – lot 74175 – received in 2021-01-30 – specification ET 17.07-AP rev04 of 2021-07

No live animals received

3.5.3 Management of suppliers of services

The subcontracted services suppliers are: pest control, calibration, laboratory analysis, waste collection, transport and meals served in the dining room.

The evaluation of subcontracted services is performed annually according to procedure PGQSA 07-AP, rev23 of August 2021 through the send of documentations and the evaluation questionnaire (CL 6.07). They will be approved if they send all requested documentation (e.g. licenses, certificates, accreditations) and score more than 39 points in the questionnaire that evaluate requirements as compliance with the contract scope, invoice conformity with the service provided, agility, conduct of professionals, level of quality of services, etc.).

3.5.4 Management of Out sourced processing

There is no out sourced processing.

3.6 Specifications

There are documented specifications for raw materials, packaging and finished products. The specifications are adequate and accurate to ensure compliance with the relevant safety and regulatory requirements.

It was evidenced the following specifications for ingredients and packages:

•Acai natural flavour –specification ET-23.07-AP rev01 of July 2020

•Sunflower lecithin – specification ET 24.07-AP rev02 July 2021

•Natural colorant (blueberry and carrot) – specification ET 12.07-AP rev04 of 2021-07

•Tapioca Syrup – specification ET 20-07-AP rev04 of July 2021

•Plastic pot 200ml – specification ET 17.07-AP rev04 of 2021-07

It was verified the following specifications for finished products:

•Organic Acai original Smoothie Pack – PSS Acai Original rev 14 of September 2021

•Sorbet or Organic Frozen Scoopable Acai with banana – PSS Acai Berry + Banana Sorbet Halal rev01 of 2021-10-29

•Organic Acai clarified concentrate – PSS Clarified Acai Juice Concentrate rev10 of 2016-07-14

The fruit specification includes sensory characteristics (e.g. colour, odour and flavour) information on harvest time, degree of ripeness, visual humidity and requirements such as provenance from certified producers, absence of pests, foreign bodies and chemical residues.

The specifications of ingredients and finished products describe sensory characteristics (e.g. colour, odour and flavour), applicable physical-chemical parameters (e.g. pH, humidity, acidity, total solids, heavy metals), microbiological and macro-microscopic parameters in compliance with legal requirements (RDC 12/2001 and RDC 14/2014), composition, packaging characteristics, shelf-life and storage conditions

The packaging specification including material description/composition, approved suppliers, dimensional characteristics (height, width, thickness, volume) and compliance with the requirements of ANVISA legislation for total and specific migration (RDC 51/2010 and RDC 52/2010).

The specifications are formally agreed by contract and are reviewed annually.

3.7 Corrective and preventive actions

Corrective action is taken as soon as a deviation is detected. There is a specific procedure PGQSA 22-AP rev06 of July 2021. It describes methodology to register, investigate and define the corrective action plan and/or preventive action plan. It was reviewed the corrective action in internal audit, complaints and external audits. The corrective actions from non-compliance of prerequisite programs are taken immediately and register in specific form used for the non-conformities handling (Annex 1.22, Rev. 15) or on available fields in the monitoring spreadsheets. Evidenced the record of a non-conformities of May and September 2021 for internal audits. It was also verified RNC number 001/004 of 2021-04-29, about absence of suitable uniform for employee. All non-conformities verified have ause analysis were carried out through the use of Ishikawa diagram

3.8 Control of non-conforming product

There is procedure for the control of non-conforming product (IT 2.22-AP revision 18 of June 2021).

The non-conforming products are segregated, identified and blocked for use. Only the Quality Department can release this kind of product.

All process well understood by the staff who was interviewed during the audit. There are specified 'on hold' areas within the factory.

3.9 Traceability

There is a procedure that describes the traceability (PGQSA 23-AP, Rev. 10 of October 2021). Traceability system operates through paperwork and it enables to trace raw material, ingredients, packing material and finished products.

For making the traceability exercise it is used a check list to control all necessary records – PL 1.23-AP rev17 of August 2021. Some documents used in traceability process according verified:

•PL 2.07 – Evaluation of vehicle of fruit receiving

•PC01 – Reception control

•PL 2.07 – Raw material quality control

•PL 2.02 – Register of concentration control for product used in CIP cleaning process

•PL 16.08 – Control of products used in rework

•PL 1.08 – Control of process

•PCC01 – Control of pasteurization

•PC05 – Control of warehouse temperature

•Annex 03.08-AP – Production Order (which contemplates ingredients and packages lots)

•Others PPR´s records, all contemplating in the resume of traceability item spreadsheet

For the traceability challenge was chosen a batch of sorbet code SBIH 21.275-AP, produced in 2021-07-14, lot 275 dispatched to client Ocean Fair International Group FZE from Emirates. The test was done in 1 hour 35 minutes. CoA (Certificate of analyses) of finished products was check and includes physical, chemical and microbiological internal analyses.

For this test, it was identified following raw materials, ingredients and packages:

•Fruit acai – lot FSB21.275-AP

•Sugar – lot 12180521

•Citric acid – lot SR21E00124

•Acai natural flavour – lot 1005377821

•Sunflower lecithin – lot SIL45014

•Natural colourant (blueberry and carrot) – lot L21522719

•Estabilizante – lot TO77E21

•Tapioc Syrup – lot 0612201

•Plastic pot 200ml – lot 74175

•Granola – lot 20522A25

Mass balance:

•For finished product, all pots produced was dispatched for client: 100% found

•For ingredients, test was performed for “Granola”, withing following result:

•Granola lot 20522A25; received 17000 units (this product is received also packaged in over tamp to fit in final pot of acai); 16800 untis used in 3 lots of finished product; 200 were considered damaged. See NC below.

•

Product can be reworked in some cases,i.e. product with microbiological parameters above the limits is accepted a re-pasteurization. Traceability is maintained in these cases through spreadsheet PL 16.08-AP.

Tests are performed by company monthly. Verified two tests performed by company:

- On 2021-07-19, product Acai Pure Pulp 12%, lot 6NF12D-F20354, produced in 2020-12-19, client: ITI, with expedition of 65 drums (total produced) – product organic and halal

- On 2021-10-14, product Acai Pure Pulp 12%, lot 6NF12D-F21254.491-AP, produced in 2021-09-11; client: SINC, with expedition of 18 drums (total produced) – product organic and halal

Minor NC: It was verified during mass balance of ingredient “granola” lot 20522A25, that was appointed 200 units of lost, but this quantity is not calculated with some of lost, and only supposed as this number was not found.

3.10 Complaint-handling

There is a procedure for communication and complaint handling of clients and consumers (PGQSA 22-AP rev06 of July 2021). This is the same procedure for treatment of NC.

Complaints are received through a business phone or email available on the company's website. The complaints are sent by email to the technical and quality department for handling including the root cause investigation, establishment of action plan (with sequential and unique number) and responds to the client.

Evidenced the list of complaints of the 2021 year (through spreadsheet Annex 4.22-AP). Main reasons are due to product packaging, weigh differences and quality, but not particular trends are identified. No food safety complaints received in this year. The complaint handling records are kept in the form NCR 22.

Evidenced the treatment of the customer Capri Marketing (number 001-004) and conclusion on no proceed. It was also verified number 001-006 dated 2021-06-07, about labels with facility loose, and report of action suitable described.

3.11 Management of incidents, product withdrawal and product recall

There is a specific procedure for management of incidents (PGQSA 12-AP, Rev. 20 of October 2021) contemplating as probable incidents: fire, flood, lack of energy, contamination of water in the well or cistern, bomb threats, labour crises (e.g. employee strike and manifestations), cyber-attacks, pandemic and personnel heath crisis (included in the last version due to the Covid-19 pandemic) and sabotage and intentional contamination. A list for internal contacts are available in this procedure contemplating name, deputise, function in team, 24/7 hours contact and responsibilities. There was no crisis related since last audit.

There is other procedure specific for withdrawal and recall (PGQSA 23-AP, Rev. 10 of October 2021) assigns clear responsibilities to the departments involved, establishes the occurrence verification, risks classification and recall plan defining communication actions to the clients and the regulatory authorities according to guidelines of RDC 24/2015 (Brazilian law about procedures for withdrawal/recall, communication to ANVISA and consumers) and relevant procedures such as traceability and actions recovered products including segregation, identification and destruction. No recall since 2020 audit.

It was verified contacts list of Recall Committee in the procedures. There is an external contacts list for emergency situations (eg. fire department, police, sanitary surveillance ANVISA and public utilities as energy supply company) updated by October 2021. The certification body is included as a contact in the event of a recall or regulatory food safety non-conformity (e.g. a regulatory enforcement notice), according to procedure, in these cases it will be communicated within 3 business days.

Evidenced the mock recall test performed on 2021-10-04 with product "Sambazon Frozen Unsweetened I Acai Pack pouches of 100 g", lot PA-21166-AP, produced in 2021-08-26. The corporate quality department of Sambazon participated in the mock test recall. Batch involved with 947 boxes, which 510 in stock, 201 in supermarkets, 3 boxes of sample in company and 233 boxes with bought by consumers. First client: SINC (Sambozon Incorportaion – USA). Simulation includes communication with TV and Sambazon Incorporation (for contacts with clients – supermarkets), letter for alert to FDA.

No recalls occurred since last audit.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
3.5.1.5	There is no raw material purchased from agents or brokers.
3.5.1.7	There are no raw material suppliers prescribed by a costumer.
3.5.2.3	The site is not in receipt of live animals.
3.5.4	The site has no management of outsourced processing and packing.

4. Site standards

4.1 External standards

Building is well maintained with investments regularly planned. External areas are maintained in good condition, free of waste, don't offering conditions of attraction, access, proliferation and shelter for pests and vectors. The site has an own pier for fruit reception by ships.

No birds' nests evidenced in the external walls and roofs. External traffic routes are adequately paved and surfaced. No local activities that could be a risk for product contamination were evidenced

4.2 Site security and food defence

The site has a registry in the Ministry of Agriculture, Livestock and Supply (MAPA #AP 000029-9).

There is a procedure of food defence (PGQSA 20-AP, Rev. 15 de May 2021) describing specific control measures to ensure food protection against intentional contamination. The control measures include: access control of employees, vehicles and visitors by the concierge, site perimeter fenced, security cameras system (98 cameras with monitors in administrative areas and also in cell phones of managers), identification of employees with uniforms, access control in all factory doors through magnetic locks which are opened with the employee's badge (including stock of chemicals, chlorination tanks, maintenance area) water tanks kept locked and alarm system for chlorine dosage. The security services and routines are performed by own personnel of SAMBAZON.

The site has implemented a food defence team which includes the quality manager, administrative manager, maintenance coordinator and production manager.

Vulnerability evaluation is documented: Annex 7.20-AP, Rev. 09 of July 2021.

Visitors complete a medical screening questionnaire (Annex 4.03) before visiting production areas, which is reviewed by the QA Supervisor. Visitors are accompanied at all times.

Annual security assessment was performed to verify food security, people security, and site security through check list CL 1.20-AP rev08 of July 2020. Last evaluation dated 2021-06-04.

External storage tanks as water reservoirs were evidenced with locks.

4.3 Layout, product flow and segregation

There is a zoning worksheet of the industrial areas (Annex 01.15 Rev. 02): areas were evaluated through the BRC decision tree and classified as areas without product, open product areas and low risk areas. There is no high care and high-risk areas.

There is one production building and internal areas separate and exclusive to each type of product manufactured. In general, layout and product flow are adequate and cross contamination by layout is avoided.

Employees have access to the production building through an only entrance. After the stage of fruit softening, the production occurs in closed system (pipes and tanks). Areas for acai milling and pasteurization are clearly separated from the packaging areas.

It was evidenced a map updated by July 2021 indicating all areas described above the flows of raw material, packaging, products in process, finished products, rework, people, waste and location of employee facilities. Besides there's a specific map for the flow and movement of allergenic materials (cereal only) – rev06 of October 2021.

No temporary structures evidenced during the site visit

4.4 Building fabric, raw material handling, preparation, processing, packing and storage areas

Buildings don't represent sources of direct potential contaminations to the raw materials, ingredients, packages and end products and are well maintained.

Internal walls and ceilings are masonry, have sanitary conditions for food industry and are maintained to prevent the accumulation of dirt, minimise condensation and mould growth, and facilitate cleaning. Exception NC below.

The floors are built with coated concrete, are impervious and are maintained in good repair and facilitate cleaning. They are suitably hard wearing to meet the demands of the process and withstand cleaning materials and methods. Exception NC below.

The drains are present in all productions areas in adequate incline and are maintained to minimise risk of product contamination and not compromise product safety (machinery and piping are arranged so that, wherever feasible, process waste water goes directly to drain). Except one case (see non-conformity below).

The windows conditions are satisfactory, well maintained and facilitate the cleaning process. The glass windows are protected against breakage.

Doors are kept closed and have adequate sealing

The lighting is adequate and sufficient to be provided for correct operation of processes, inspection of product and effective cleaning. Evidenced the last control of lightning intensity performed in 2020-10-20. The bulbs and strip lights are adequately protected in all internal areas (production and storage areas).

It was evidenced suitable ventilation in the product storage and processing environments to prevent condensation

Minor NC (4.4.1): It was verified wall with peeling paint next of drum package.

Minor NC (4.4.2): It was verified the water drained channel on the side of the control panel in the pasteurization room with parts of the floor covering coming off. This non-compliance is the same as in the previous audit, but on the other side. NC not appointed in chapter 01,

as the coating was carried out completely, and a recent release with warranty plan was developed by the service provider

4.5 Utilities – water, ice, air and other gases

All water used on site is from well (verified Declaration of Water Use / Concession #002/2017 issued by Institute of Environment and Planning of Amapá state, valid until 2020/02/02. A new request of licence verified with date 2020/01/08 and other one in 2021/09/16. There is water treatment plant, in which it is performed the adjustment of pH, filtration and chlorination. There is an only 1 water reservoir tank, with capacity of 200 cubes meters.

A map of the water distribution lines was evidenced.

There is a procedure for supply and treatment of water (PGQSA 05, Rev. 15 of 2021-05) stablishing procedures to ensure water quality control. Routines established are:

• Chlorine, pH and turbidity monitoring (daily): records were verified in PL 1.05, Rev. 15 and the results show chlorine levels between 1.0 and 2.0ppm, pH value between 6.0 and 9.5 and turbidity ≤ 5 NTU according to Brazilian law. Verified results of August 2021.

•Quarterly analysis (basic physical, chemical and microbiological): Verified report number #08-1746/21 of 2021-08-27 – Laboratory "Análises Controle de Qualidade".

•Complete analysis of potability (every six months) according to Brazilian law: it was verified test report issued by Eurofins laboratory in 2021-07-17 number 122541/2021.0.A (approved results) and ISO/IEC 17025:2005 accreditation from laboratory (CRL 0267, since 28/09/2006, active status). .

No other utilities as air or steam in direct contact used.

4.6 Equipment

The main equipment are conveyor belts, tanks, pipes, filters, tubular pasteurizer, feeders, packaging machines and sorbet machines.

Equipment in stainless steel and Teflon mats. It was reviewed their confirmation of approval for food use and well maintained under routine maintenance systems

4.7 Maintenance

There is a documented maintenance program (PGQSA-AP 10, Rev. 17 of August 2021) that includes the description of corrective and preventive maintenance. Corrective maintenance

is performed when necessary and activities of preventive maintenance are managed by schedules available in PL 4.10 for each equipment and the frequencies are defined based on the manufacturers' recommendations and equipment maintenance history. At the maintenance area work about 20 people.

Equipment are classified as critical as for example pasteurizers; other than are considered secondary are receive fortnightly preventive maintenance.

Evidenced the records of preventive maintenance for:

• Acai pulp sachets packaging machines, performed each 15 days, dated 2021-10-30 and 2021-11-09, according forms PL 4.10-AP. These forms contemplate the frequency for each equipment for preventive maintenance;

•Massaretor (pulp machine). Performed weekly, dated 2021-11-11 and 2021-11-15

Besides, it's established a lubrication plan for all equipment with mobile parts. Verified plan and records for:

•Conveyor that feeds the masserator, performed weekly, dated 2021-11-01 and 2021-11-09

•Sorbet machine, performed weekly dated 2021-11-02 and 2021-11-10

The use of food grade grease was verified for unique grease actually used: Notria Alime 38, manufactured by Grax and certified by NSF-H1 #137045. Evidenced the letter of guarantee the absence of allergenic supplier dated 2021-02-02.

Maintenance procedures are detailed to ensure that, on completion of any maintenance activity, pieces and tools are removed from the place and equipment and areas are cleaned by employees and inspected by Quality Team. Service orders include fields for verification by the Quality Team regarding these requirements and release of equipment and industry, as record of corrective maintenance of 2021-11-15, for piece replace in pasteurizer, signed by Quality team for equipment release.

The maintenance department performs by their own some predictive maintenance activities as thermography.

The maintenance workshop was evidenced as clean and organized

4.8 Staff facilities

There are suitable changing rooms and toilets separated for men and women maintained in clean condition by dedicated cleaning staff. Toilets have proper signs that remember to wash hands.

It is not allowed to bring food into the site and there is catering facility for meals. Entrance and exit of canteen are controlled by individual cards. The canteen receives prepared meals for employees. No cooking and ingredients storage is carried out at the canteen.

There are hand-washing facilities at the entrance of production areas and these are supplied with water, liquid soap, disposable towels and sanitization. Hands are disinfected using alcohol-based gel.

Boot wash facilities are provided in factory and production entrances as well as foot bath with sanitizing agents.

It is not allowed to smoke in the site.

There is no vending machines on site.

4.9 Chemical and physical product contamination control: raw material handling, preparation, processing, packing and storage areas

4.9.1 Chemical control

There is a specific Brazilian law about control of chemical products that can be used in food Industry.

There is a program for control and disposal of chemicals which includes a list of all chemicals used at the site. A specific instruction for chemical storage is established (IT 1.02-AP rev16 of 2021-05). The list informs product category, brand, manufacturer, form of use and storage area and handling of product is defined in procedure IT 6.07-AP rev16 of 2021-03.

All chemicals products (e.g. cleaning and greases) are stored in segregated and locked rooms with restricted access

4.9.2 Metal control

Control measures for metals include:

•• Refining stage, magnets and filters throughout the manufacturing process.

• Good practices of maintenance and counting of pieces and tools before and after the activities of maintenance and release of the area by the Quality team.

•Metal utensils control (scissors; used only in the laboratory): these utensils are controlled daily by counting and integrity checking: the records are performed in CL 3.13, Rev. 04.

Verified register of utensils of laboratory from August 2021 (spreadsheet with all days in the month).

Clips and paper clips are not allowed in production and handling areas. Metal detectors are not used

4.9.3 Glass, brittle plastic, ceramics and similar materials

The control of glass, brittle plastic, ceramics and similar materials is performed weekly by counting and integrity checking of items made or composed of such materials; according the procedure PGQSA 13-AP revision 10 of 2021-05. Procedures are adopted in case of broken (as IT 1.13, Rev10 of July 2021): stopping production, internal communication, isolation of the affected area, removing of all fragment, disposal of the exposed products, cleaning of the affected areas, inspection and area release by Quality Team.

Evidenced the weekly inspections performed through the check list CL 2.13-AP (inspections of week of August 2021 – 4 weeks). All glass, hard plastics and brittle items are quantified and inventoried by sector. Besides there's a record of control of glass items belonging to the laboratory, which is carried out weekly too (record CL.1.13)

There is a record for control of entry and exit of these objects (PL 1.13-AP).

There was not observed damage items during the audit. There is an occurrence register of foreign

4.9.4 Products packed into glass or other brittle containers

No products packed into glass or brittle materials containers.

4.9.5 Wood

Wood is not allowed where there is open product, only in the palletizing area for finished product, and some ingredients e packaging materials enter the reception area in wooden pallets. Pallets in poor condition are discarded. There's a form used for check of pallets that used in internal areas – CL 5.08-AP

4.9.6 Other physical contaminants

Conditioning of packaging materials (plastic bowls, buckets or drums) is done outside of production or packing lines.

There's a policy for the use of pens which shall be without caps and of an entire piece.

4.10 Foreign-body detection and removal equipment

4.10.1 Selection and operation of foreign-body detection and removal equipment

The hazard analysis established the use of filters and magnets along the process as devices for foreign-body removal.

4.10.2 Filters and sieves

There are filters before filling or packaging, which are considered CPs and CCPs. The integrity is monitoring twice a day, at the beginning and end of production. Filtration previous pasteurization is a control point (size of 3 mm) and filtration previous packaging is considered a Critical control point (2 mm is the minimum limit of retained particles).

4.10.3 Metal detectors and X-ray equipment

The process does not require metal detectors or X-ray equipment

4.10.4 Magnets

There's a magnetic trap previous the pasteurizer which is checked twice a day, at the beginning and end of production. Minimum magnetic force required is 1500 Gauss. It is recorded in the PCC-2-AP template where the CCP#2 is recorded as well.

4.10.5 Optical sorting equipment

No optical sorting devices required

4.10.6 Container cleanliness – glass jars, cans and other rigid containers

Packaging containers used do not require on line cleaning.

4.11 Housekeeping and hygiene

There is a specific preventive program for cleaning and disinfection (PGQSA 02-AP, Rev. 16 7 of May 2021) and related work instructions that include clear and detailed procedures about of cleaning and disinfection of the facilities (e.g. walls, ceilings, floors and drains), equipment (e.g. tanks, conveyor belts, filters, pipes), furniture (e.g. tables, cabinets and trash cans) and utensils (e.g. boxes, knives), including responsibilities, frequencies, chemical products used and their dilutions, monitoring and verification plans by the Quality Team. The mainly procedure describes all directives cleaning process and control of cleaning.

From the general cleaning and sanitation procedure are derivate several working instructions for cleaning tasks as for example: manual cleaning of packaging tanks, syrup tanks.

During production there are always employees cleaning the areas. Site was maintained in appropriate level of cleanliness.

The cleaning is carried out by production employees and the visual inspection, chemical and microbiological validation are performed after each cleaning by Quality Team.

Evidenced the daily cleaning verification records of different points through ATP swabbing, total plate count of aerobic bacteria and Total coliforms of critical points as filling points of packaging equipment, etc. (See chapter 4.11.8).

The cleaning chemicals products are stored in a segregated location with access control and they are kept properly identified. Verified that all products are suitable for use in food industry. The Material Safety Data Sheets were available on place.

Utensils for cleaning purposes were evidenced as well identified for established areas.

4.11.7 Cleaning in place (CIP)

The CIP procedures carried out on site are documented specific procedures, as IT 13.02, Rev. 17 of 2021-05 is for the CIP operation of complete process IT 44.02, Rev. 17 of March 2021 for pasteurizer and filling / packing line (intermediate CIP).

Cleaning is accompanied by trained employee who performs the dilution of the chemicals products and controls the flow of the solutions and rinse water in the pipes and tanks. The frequency is daily.

Concentration of cleaning agents are established (soda 2.0-2.5%).

Through an interview, it was evidenced knowledge of the pasteurizer operator on the execution of CIP.

It was evidenced a schematic diagram of the CIP system layout including process piping circuits (Annex 05.15).

Some records verified:

•PL 2.02-AP – Control of concentration of products used in CIP cleaning (2021-07-12 to 16)

•CL 3.02-AP – Check list of cleaning CIP of pasteurizer and packaging line

•PL 3.02-AP – Applied after CIP cleaning to test chemical residues

It was verified CIP validation report carried out in 04/2016 by evaluating the history of chemical concentration records, results of phenolphthalein tests and microbiological analyses of ATP, mesophilic and E. coli

4.11.8 Environmental monitoring

There's a documented environmental monitoring plan PGQSA 17-AP revision 02 of December 2020. The plan considers different zones for establishing the sampling, including frequency, method and target microorganism Example: at zone 1:

•(surfaces in contact with product) is carried out daily control of total plate count of aerobic bacteria:

•Daily analyses of coliforms in last wash water:

•Weekly: exposed plat in air (Moulds and yeast, total count, coliforms and salmonella):

•Week: hands of employees:

•Weekly: for uniforms:

•Weekly for water:

For all above frequency, it was verified records form first week of August 2021, through records in spreadsheet PL 2.1-AP; PL 3.17-AP; PL 4.17-AP, PL 5.17-AP; PL 6.17-AP.

Evidenced the last quarterly report of trends ANEXO 1.17-AP of the period July – September 2021 with no particular increasing values (trend analyses for evaluation of environmental air – analyses of exposed plate).

4.12 Waste

There is a Program for Management of Industrial Residues (PGQSA 06-AP, Rev. 16 of 05/2021).

Waste is well managed on site and is collected into a specific area in bins located throughout the site grounds and within the production areas. There is an external waste collection room and they are locked. These areas are cleaned (removed waste) every day.

Açai bones are used as fuel for the water boiler. Part of them are burned in the own boiler and part are managed by wastes management supplier (PIMENTEL TRANSPORTE E SERVICOS, which tranports waste by others company, as AAA Calandrine, licensed by the Environment Ministry of the state of Amapá on December 2012, with certificate valid for 6 years.

Residues from the cleaning process and laboratory hazardous residues are chemically neutralized and destined to waste treatment plant.

Waste products are destined as biomass for the brick industries.

Recycled waste was collected by third party company, C.A. de A. FREIRES – ME, with environmental licence by the Environment authority of the Amapá state (# 0087/2017 issued on 2017-04-07; valid for 6 years).

In case of the need to reject packed product, the company is in charge of the product packaging identification mischaracterization.

4.13 Management of surplus food and products for animal feed

No surplus product. Products are not sold to employees or donned to organizations. Products or by products are not destined to animal feed

4.14 Pest management

There is a documented pest control program (PGQSA 04-AP, Rev. 16 of May 2021).

Pest control program covers rodents and insects like flies, spiders, bees, rats, scorpions and cockroaches. Types of baits used: glue boards for internal area, poison blocks in fixed and secure baits for external areas and light trap. The site hires the services of the AGROQUALITY ROMAR LTDA. A contract with the specifications of the services is established, signed in November 2017.

The pest control supplier is authorized by the municipal authority of the Macapá city through the licence # 98402921481 valid until 2022-03-31.

There is an updated mapa (issue 17 of May 2021) covering all baits (24 lightining traps; 53 internal traps for rodents, with adhesive or T-Rex traps; 46 external stations with baits). The suppliers perform fortnightly inspections of the stations.

Evidenced the monthly report of November 5th, 2021 with the summary of inspection results of October. Report contemplates visits performed on 2021-11-14 and 28.

Verified use of pesticide NEENMAX , for insects control, used in dilution between 1 to 2%, according defined in the list of pesticides by company.

This company have a technical responsible: Henrique Fujisaki, agronomist engineer, registered in CREA-AP (#440401/2021) valid until 2022-01-17..

It was verified the pest control training records of the personnel in charge of the inspections and pest control activities of AGROQUALITY. Evidenced the records of David Fonseca da Cruz , in charge of the last inspections (training records of 2021-06-15).

The Company has doors, windows and other potential entry points sealed and inspect all receipt of raw materials and packaging for signs of infestation prior to accepting them into the site.

In addition, routine inspections are performed with the monthly internal audit of prerequisite programs (GMP). No evidence of infestation has been found or has recently been reported.

The subcontracted company produce monthly reports of observations and action recommendations at each visit, as well as of trends results.

In-death report was verified related year 2020, provide by third party company.

Measures for preventing the entrance of birds are established at loading points and at the entrance of the fruit for processing.

4.15 Storage facilities

There are procedures for storage control and temperature control (IT 08.08 version 15 of 2021-06)

FIFO is established in storage and controlled through the visual and Excell system registers. All products are frozen.

The temperature limits of the audited areas are:

•Freezing tunnels ≤ - 18 ° C;

•Storage chambers of finished products ≤ -15,0 °C (keeping product with minimum -18ºC)

The temperature monitoring of these areas is performed daily (every 4 hours) by the Quality Team and appropriate records were checked (PL 2.08, Rev. 17 of July 2021; evidenced the records of holy September 2021 month, with all values of storage chamber less than -18 ºC.

There are specific storage areas for raw materials, primary and secondary packaging, and finished products and these locations are kept in good condition of cleaning and conservation. No products stored under controlled atmosphere. No outside storage. There is a specific room for cereals considered allergen.

Minor NC (4.15.1): It was verified allergen storage in excusive room, but without suitable distance with walls.

4.16 Dispatch and transport

There is specific procedure for loading and transport (IT. 10.08 revision 15 of June 2021) and include evaluation of the products, shipment and post shipment.

Fruit is received only by ships; inspections on receive of the hygiene conditions of ships are kept documented (record CL 2.07-AP).

Trucks and containers are subcontracted and loaded through the suitable docks. Preloading inspections are in place. It was reviewed shipment records during site inspection and traceability challenge (CL. 1.08, Rev. 16). Verified check list used for vehicle MIJ 6140 for loading in 2021-07-23.

Drivers sign terms of responsibility for transport (available in the shipment record) which detail requirements of temperature, distribution and safety. The contracts established between the company and the third-party companies also define transportation requirements to be fulfilled. Evidenced the contract with the transport supplier TRANSPORTE TREMEA LTDA. of March 2021.

There is temperature control during transport keeping this parameter within the specified limits. Monitoring is performed through data loggers, as verified for vehicle in the traceability exercise: TAG number #2000127544 used in 2021-07-23.

Load compartment are cleaned before all loads.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
4.4.5	There are no suspended ceilings.
4.7.3	There is no temporary repair.
4.9.4	No products packed in glass.
4.10.5	No optical sorting equipment is used.
4.10.6	No rigid containers are used.
4.13	There is no management of surplus food and products for animal feed.
4.15.4	There is no controlled atmosphere storage.

4.15.3	There is no outside storage.
4.15.4	There is no controlled atmosphere storage.
4.15.5	There is no storage outside.

5. Product control

5.1 Product design/development

There is a program of projects and product development (PGQSA 21-AP, Rev. 05 of July 2021)

The new product demands are sent to the technical department by Sambazon located in USA (headquarters). From this demand tests of new processes and products are defined in Annex 01 - Technical Bulletin Report (TBR) and there is the record of project history, meetings, process parameters adopted and final opinions about on the tests. A TBR was verified for development of blend of raw acai relative to different regions to test of flavour interference – development register number 002-21 of 2021-07-04.

Records of changes in formulations, ingredients, suppliers and packaging are kept in HACCP plans, in program of input management and in approval documents for new suppliers, ingredients and packaging.

The shelf-life trail was performed in product development and the tests are performed to validate the shelf-life of each product type (puree, sorbets, clarified acai) in the development and annually (monitoring after the date of production and expiration date). Sensorial, physical-chemical and microbiological analyses are conducted according to the standards determined by the specifications of each product.

Evidenced records for shelf life in products (finished) as:

•Acai clarified lot CLD-F19.031.014 – product expired in 2021-01-31 / last analyses 2021-09-01 (8 months after)

5.2 Product labelling

The contents of labels are checked by the Quality and R&D departments to confirm compliance with specifications and legal requirements of the destination country of use. The

labels intended for the external market must be approved by the technical department of USA Sambazon (headquarter). All labels are approved by clients.

Nutritional information is verified through tests performed in 2017.

The labelling information includes the sales name, net weight, identification of origin, list of ingredients, alert for allergens, nutrition facts, method of preparation (where applicable), conditions of conservation, product registration number (MAPA) and certification seals.

The labels are checked by the production team at the beginning, middle and end of production.

There is no specific claim which request a nutritional value validation.

There are no cooking instructions.

5.3 Management of allergens

The site has a documented allergen procedure (PGQSA 18-AP, Rev. 17 of October 2021) which contains an analysis of site raw materials and potential allergens based in EU regulation and Brazilian law RDC 26/2015.

Cereals with gluten are the only allergen present at the site. Cereals are packed by the supplier (Feinkost) so they are not handled by the site. The individual packaging's are attached to each product pot. During the audit were shown specific area and identification for this ingredient and the labels of finished products that contain this ingredient have alert for allergens. An instruction for managing the cereal pots is available (IT 1.18-AP revision 09 of August 2021).

It was evidenced suitable control measures and implemented: To entry with food in processing areas is not allowed and employees are prohibited from leaving the dining room carrying food.

Evidenced a map showing the movement routes of cereal with gluten as the only allergenic managed at the site.

Products are declared as gluten free. Evidenced the test on Frozen Smooth Acai batch OA21.025-AP of of 2021-02-19 with gliadin < 0, 5 mg/kg or 1mg/kg of gluten by Eurofins laboratory (report number AR-21-GB-042543-01-N).

The employees are trained in the allergens control and effects as part of their initial and annual training.

5.4 Product authenticity, claims and chain of custody

Risk assessment for raw material (acai berry), ingredients and packing are documented in HACCP Plans. Raw materials, ingredients and packing materials are assessed, and they are classified in high, medium, low risk, regarding the severity and probability of occurrence. Physical, chemical and microbiological hazards, substitution or fraud and allergens were considered in determining the final risk. This risk assessment is reviewed annually. Last assessment was updated as document Annex 29.07-AP rev03 of 2021-08. The specific vulnerability fraud risks is in spreadsheet Annex 1.24-AP rev03 of October 2021 and detected are, for example, non-organic raw materials as guarana extract, sugar, ice-cream stabilizer, sunflower lecithin, etc.

The vulnerability analysis to substitution or fraud is based on the supplier control, receipt historical, control throughout the process and official sources and includes the probability of occurrence and control measures and risk related to probability. The risk assessment considers the actions when it is detected a product with high risk of substitution or fraud. There's a documented procedure for assuring the authenticity of raw materials PSGQSA 24-AP revision 05 of October 2021. No specific tests are carried out on raw materials for verifying authenticity properties; all is assured through certifications or test reports.

100% products meet requirements from Kosher, Halal, Organic USD and Fair trade. There are no different products that need segregation, expectation products with non-halal flavour. The site maintains the necessary certification status in order to make such a claim:

•• Kosher: annual audits by Orthodox Union, certificate valid until 2022-06-30.

•• Organic USD: annual audits by Ecocert, certificate valid until 2022-10-07.

•• Halal by FAMBRAS; certificate valid until 2024-01-11.

The traceability and mass balance with preserved identity product is carried out regularly according the traceability procedure as all product is organic, Kosher and Halal. Traceability tests are performed monthly.

5.5 Product packaging

Packaging materials are appropriate for the range of operations performed. Specifications or conformity certificates are available for all packaging materials used by the company.

Food contact statements were available for packaging materials as part of the specifications or as separate documents.

Packaging materials are stored in a designated packaging warehouse. These areas are in good and suitable condition. Instructions to manage obsolete packaging and labelling materials are established.

Evidenced migration test of PP, for pots (according sampled in traceability), from company NOVA ERA, with certificate number #QUI/L-227.066/1/12 of 2012-11-07 – Laboratory Falcão Bauer.

There is a documented procedure (IT 10.07 rev03 of July 2021) contemplating obsolete items or discontinuously item and also disposal of packages only after decharacterization of then.

5.6 Product inspection and laboratory testing

5.6.1 Product inspection and testing

There's a laboratory at the site with adequate separation and barriers to prevent contamination of production areas. The laboratory has restricted access for other people that not work in the lab and the access is controlled by magnetic cards.

There is a procedure for managing physical-chemical and microbiological laboratory results (PGQSA 14-AP, Rev. 16 of May 2021). The analyses program on finished products is performed at external laboratory: every 100 lots produced, 1 lot is sent for complete analysis (physical-chemistry, heavy metals, mycotoxins, macro-microscopy, pesticides, microbiology). Laboratory EUROFINS of Sao Paulo state is used for external analysis (ISO 17025 accredited).

For internal control of the product, al the laboratory of the site is carried out tests of pH, soluble solids (ºBrix), total acidity, total solids, viscosity, etc. Microbiological tests on product as moulds and yeasts, total coliforms, thermotolerant coliforms and total plate count of bacteria are performed at the own laboratory.

The laboratory has documented instructions for testing, based on recognized methods.

Some analyses results verified during audit:

•Sorbet sampled during traceability in this audit:

•Total count of moulds and yeasts, Total count of bacteria and Total coliforms: CoA of SBIH21.275-AP of manufacturing date of 2021-07-14.

•Monthly analyses performed by external laboratory:

•Aflatoxin: AR-21-SM-017477-01-EN-N of 2021-07-16

•Heavy metals report as for arsenic: AR-21-SM-018574-01-EN-N of 2021-07-16 and AR-21-SM-020305-01-EN-N of 2021-08-05

•Microscopy: Ar-21-SM-018202-01-EN-N of 2021-07-16

Shelf life on-going is performed each 3 months for all kind of products during shelf life.

Evidenced the record of monitoring of shelf life of following products:

•Original Acai lot OA20.001-AO

•Sorbet Acai lot SBO20.008-AP

Both products above were analysed in January 2020 (initial), April, June, October, January 2021, April, June and October. Ass result until last analyses are conform.

5.6.2 Laboratory testing

Analyses are carried out internally or in ISO/IEC 17025 accredited laboratories.

There's an internal physicochemical and microbiological laboratory that work 8 people. The access to the laboratory is restricted and it can be done only by magnetic card.

The internal laboratory has an own manual of instructions for testing methods, which are carried out using recognized standards. A calibration plan for the laboratory equipment is established. Results have been compared through interlaboratory testing with other unit of Sambazon (Barcarena site).

For external laboratories, it was evidenced Eurofins Accreditation (CRL 1295) and Eurofins Environmental (CRL 0267).

5.7 Product release

The product release is performed after approval of analyses carried out in the internal laboratory: sensory (flavour, colour, odour and aspect), physical-chemical (eg. pH, acidity, total solids, particle size) and microbiological (e.g.: Moulds and yeasts, Total count of bacteria, Total coliforms, Salmonella). Salmonella is analysed in external laboratory. Product keeps in quarantine until analyses result.

All products out of specification are clearly identified, labelled and quarantined to prevent accidental release.

5.8 Pet Food

No pet food produced at the site.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
5.2.3	There is no product designed to enable claim.
5.2.4	Label information is not the responsibility of a customer or a nominated third party.
5.2.5	There is no cook instruction.
5.8	There is no pet food product.

6. Process control

6.1 Control of operations

The process of monitoring ensures that the product is produced within the required specification.

There are control points established for: control of fruits receipt, cleaning and checking filters and magnets, cooling control after pasteurization (≤ 17 ° C); temperature process and temperature of warehouse for finished products.

Water chlorination for the first step of açai washing is done once a day.

A procedure of identification checking is in place to ensure that product is packed into the correct packaging. The change of packaging is done according to the requirements of clients.

For areas that handle allergens the production is scheduled to enable allergen containing products to be produced by last.

The flow and residence time of the pasteurizer has been validated to assure the lower critical limit of pasteurization temperature.

6.2 Labelling and pack control

Packaging and label are conferred to each receipt. It was verified incoming inspection of packaging, with evaluation of dimensions, labelling information, printing and colour

standard, integrity, presence of moisture, microbiological analysis (coliforms and total bacteria).

A spreadsheet for packaging checking is in place (PL 21.08-AP) to ensure that each product is packed into the correct labelled packing by each lot during the process (at the beginning, middle and end of production), including the production and expiry date that is on-line printed on pots for the sorbet packing line. This record have photos of packages and date printed.

There's on line equipment for shelf life and batch printing on packaging. Verifications are carried out along the production shift. It was interviewed a packing operator relative to manual dates print during the site visit.

6.3 Quantity, weight, volume and number control

The products are packed with medium weight. Manual checks are performed by Quality Team according to according to the type of product, for example:

•For acai smooth pack, verified weigh control through spreadsheet PL 7.08-AP of 2021-11-17 which are checked 3 samples for each box

•For acai sorbet, verified spreadsheet for weight control PL 13.08-AP of 2021-11-16 (sample of 1 pot for each 10 pots

6.4 Calibration and control of measuring and monitoring devices

The company has identified measuring equipment used to monitor critical control points and product safety and legality.

There is a procedure (PGQSA 09-AP, Rev. 16 of May 2021) that defines the frequencies of instrument's calibration. Acceptance criteria and status of devices are describing in list of approved devices (Anexx 2.09-AP).

All the instruments have an identification code that defines the instrument type, unit type, series number, location area code, section code and sequential number at the sector.

The identified measuring reference equipment is calibrated against recognized and traceable standards. Procedures are in place to register actions taken when the measuring and monitoring devices are not operating within specified limits.

It was reviewed the following calibration certificates:

•PT-100 temperature sensor of pasteurizer, code TIC PRO 005 (calibrated every one year according the calibration program); calibrated by CALITEC (calibration laboratory of the city of Belem) on 2021-09-29 (Certificate number #CT18253/21)..

•Weight scale TAG WI PRO 020 (check of sorbet bucket) – certificate CT18250/21 of 2021-10-05.

•Weight scale WI PRO 004 (check of sorbet bucket) – certificate number CT18247/21 of 2021-09-28

The standards used in equipment calibrations are identified and tracked against recognized standards, as verified in certificate VISOMES number #LV00327-33819-19-R0 of 2019-10-18 (standard used in calibration of device TIC PRO 005 listed above).

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
6.3.2	There is no bulk quantity.

7. Personnel

7.1 Training: raw material handling, preparation, processing, packing and storage areas

There is a training procedure (PSGQSA 01-AP, Rev. 18 of April 2021). The company has a comprehensive training program for staff before start working and annual refresher training (or when appropriate). It was verified annual training schedule (Annex 5.01-AP, issued in March 2021). The training covers the following topics: integration, FSQMS, GMP, HACCP, Pest Control, Food Defence, Allergens, Chemicals Management, Microbiological Analysis Techniques, labelling and packaging procedures and Housekeeping.

Updated training records were reviewed:

• HACCP and CCP monitoring of 2021-04-15, including 2 operators of CCP monitoring interviewed during audit

•GMP refreshment: 2021-06-10 by SENAI

•GMP, including allergens, food defence and food fraud: 2021-07-09

•Introduce training, including policy, allergens, GMP, HACCP, food defence and food fraud: 2021-08-20

•Last training about labelling and packaging procedures performed on 2021-08-13.

•Training of cleaning and CIP: 2021-06-18

The trainings efficacy assessments are performed through the application of tests to the participants with questions related to the training theme. The percentage of approval and indication that the training was effective is 70%. If the participant does not reach this score, it must be retrained.

7.2 Personal hygiene: raw material handling, preparation, processing, packing and storage areas

The requirements relating to personnel hygiene are documented in hygiene and health program (IT 4.03-AP Revision 17 of May 2021) including provisions on hair and beard, fingernails, jewellery and personal belongings, smoking, eating rules, hand hygiene, use and washing conditions of uniforms, rules for cuts,

skin abrasions and infectious diseases. These requirements are transmitted to the employees through training and displayed in notices around the site.

Contractors and visitors are all required to complete a medical screening questionnaire prior to entering production areas as well as they are required to read and sign compliance with the GMP rules and personal hygiene rules of the site.

Cuttings and infectious diseases are treated in procedure PGQSA 03-AP rev17 of August 2021. Dressings are not worn. When an employee has cuts and wounds or infectious diseases, he is placed in another temporary activity, away from production activities.

7.3 Medical screening

The documented procedure is updated annually: it was verified the 2021 Occupational Health Control Plan.

Employees must undergo medical examinations (laboratory tests and medical evaluation) as part of the initial employment procedure, before the function change (if necessary), after vacation and annually.

The Quality Assistants annual must pass a medical examination (Occupational Health Certificate) which releases them to handle food.

Evidenced the annual health control of the following employees:

•• R.P.S.G. (Operator od filter monitoring - CCP); performed on 2021-03-23.

•• J.T.S.. (Fruit selection operator) : performed on 2021-08-06.

Contractors and visitors are all required to complete a medical screening questionnaire before entering production areas.

7.4 Protective clothing: employees or visitors to production areas

The protective clothing provided for the team includes: hood, thermal jackets, thermal pants and thermal gloves to access the cameras; safety boots or PVC boots and ear protector in all areas.

Visitors/contractors receive mobcap, top, trousers, boots and appropriate personal protective equipment.

The laundry is part of the site. It is divided into clean and dirty areas with restricted access and uses specific odourless chemicals.

The procedure for monitoring the effectiveness of the washing processes includes visual inspection and routine swabs (weekly).

Disposable gloves (nitrile and blue) may be used by employees for food handling (but not required) and, if used, are replaced whenever necessary. No items of personal protective clothing that are not suitable for laundering are provided.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
7.4.6	There are no items of personal protective clothing that are not suitable for laundering.

Template control	Food	Version	1.0

8. High-Risk, High-Care and Ambient High-Care Production Risk Zones
8.1 Layout product flow and segregation in high-risk, high-care and ambient high-care zones
Not applicable
8.2 Building fabric in high-risk and high-care zones
Not applicable
8.3 Maintenance in high-risk and high-care zones
Not applicable
8.4 Staff facilities for high-risk and high-care zones
Not applicable
8.5 Housekeeping and hygiene in the high-risk high-care zones
Not applicable
8.6 Waste/Waste disposal in high risk, high care zones
Not applicable
8.7 Protective clothing in the high-risk high-care zones
Not applicable

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification

8	Chapter not applied

9 - Traded Products

9.1 Approval and performance monitoring of manufacturers/packers of traded food products

Not applicable

9.2 Specifications

Not applicable

9.3 Product inspection and laboratory testing

Not applicable

9.4 Product legality

Not applicable

9.5 Traceability

Not applicable

Module 11: Meat supply chain assurance

11.1 Traceability

11.2 Approval of meat supply chain

11.3 Raw material receipt and inspection

11.4 Management of cross-contamination between species

11.5 Product testing

11.6 Training

Module 12: AOECS Gluten-free Foods
12.1 Senior management
12.2 Management of suppliers of raw materials and packaging
12.3 Outsourced production
12.4 Specifications
12.5 Management of gluten cross-contamination
12.6 Management of incidents, product withdrawal and product recall
12.7 Labelling
12.8 Product inspection and laboratory testing

Module 13 FSMA Preventive Controls Preparedness Module Version 2 July 2018			
Clause	Module item	Conforms Y/N	Comments