



55 RAILROAD AVENUE
RIDGEFIELD, NEW JERSEY 07657
PHONE: 201.941.8777 FAX: 201.941.1881
WWW.IFF-HEALTH.COM

FOOD SAFETY AND QUALITY COMPLIANCE

January 23, 2023

Thank you for considering Grow as your supplier of premium vitamin and mineral powders. This document will provide answers regarding the food safety and quality compliance applied to products manufactured by Grow. The statements contained in this document are valid for 3 years from the date above.

Should you find that you require additional information, please do not hesitate to reach out to your account manager.

Sincerely,

A handwritten signature in blue ink, appearing to read "Riot Quinn", with a long horizontal flourish extending to the right.

Riot Quinn

Quality Manager, Grow Company

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1.0 COMPLIANCE

Grow maintains Global Food Safety Compliance (GFSI), via FSSC 22000 Certification. Certifications are valid for 3 years and require annual surveillance audits. A copy of our certificate is available upon request. Due to the proprietary information contained in the audit report, we do not provide a copy of the report.

FSSC 22000 is a leader in global food safety and quality standards. The standard is compliant to ISO 22000 and ISO 22002. The standard includes compliance to HACCP, GMP, Sanitation, Food Defense, and Food Fraud.

The Quality Manager maintains PCQI (Process Control Qualified Individual) certification and is the Food Safety Team Lead. The Food Safety team is responsible for conducting Hazard Analysis for all products and processes. The team is further responsible for Food Defense and Food Fraud hazard analysis.

In addition to the 3rd party audit Grow conducts its own internal compliance audit and GMP audits.

2.0 LOCATION

Grow Company has one manufacturing location, located at:

55 Railroad Avenue
Ridgefield, NJ 07657

3.0 STANDARD OPERATING PROCEDURES

Grow maintains a Food Safety Management System (FSMS) SOPs. These SOPs contain confidential information and are thereby not shared. Please find our current Table of content of SOPs for FSMS. Please note this TOC is subject to change at Grow's discretion to ensure compliance with GFSI standards without notice.

Document #	Document Title
QC-1004	Cleaning and Sanitation
QC-1017	Release of Finished Product
QC-1019	Training
QC-1020	Pest Control
QC-1021	Water, Ice, and Air
QC-1027	Waste Management
QC-1029	Management of Change
QC-1031	Good Manufacturing Practices
QC-1042	Allergen Management
QC-1047	Organizational Chart
QC-1059	Recall and Traceability
QC-1060	Non-Conformance(s)
QC-1065	Supplier and Ingredient Approval
QC-1067	Environmental Monitoring
QC-1068	Document Control and Retention
QC-1071	Food Safety and Quality Systems
QC-1122	Auditing
QC-1142	Research and Development
QC-1143	Food Defense and Food Fraud

4.0 GOOD MANUFACTURING PRACTICES

Good Manufacturing Practices (GMPs) outlining the requirements to produce safe foods are documented, trained, and enforced. All employees, contractors, and visitors are required to comply with all GMPs. GMP inspections and audits occur with a regular frequency with timely corrective action of any findings.

The GMP program is modeled after FDA Title 21, Part 117 Current Good Manufacturing Practice, Hazard Analysis, and risk-Based Preventive Controls for Human Food, and FDA Title 21, Part 111 Current Good Manufacturing Practice in Manufacturing, Packaging, Labeling, or Holding Operations for Dietary Supplements.

5.0 HACCP

A hazard Analysis is conducted annually for all grow products. Products are grouped into manufacturing categories. A process flow chart and Hazard Analysis are completed for each category. Due to the sensitive and proprietary information contained in the Hazard Analysis, it is not available for release or review. The process flow charts are available upon request. A List of products including their process category may be requested.

6.0 FOOD DEFENSE AND FOOD FRAUD

Grow is fully compliant with the Public Health Security and Bioterrorism Preparedness and Response Act of 2002. Grow completes an assessment utilizing the FDA Food Defense and Food Fraud Plan Builder to assess vulnerabilities. Due to the confidential information contained in this assessment, it remains a confidential document.

This assessment is completed by a multi-disciplined team consisting of members from all departments. The assessment analyzes security measures for the building perimeter, interior, utilities, storage, processes, computer systems, and supply chain.

Additionally, the assessment includes a vulnerability assessment for Food Fraud. This assessment includes an assessment of raw materials and internal processes in which intentional adulteration could be introduced.

Employees receive training upon the start of their employment and as an annual refresher training on food defense and food fraud. This training includes the FDA's FIRST line of food defense along with Grow's internal requirements for preventing acts of bioterrorism and adulteration.

Visitors to Grow are required to sign in at reception and are always escorted by a staff member. Access to high-risk areas is limited based on the activity occurring at that time.

7.0 RECALL AND TRACEABILITY

Grow maintains a Recall policy that identifies the assigned responsibilities and emergency contact list in the event of a recall.

The scope of our policy includes all items produced or packed by Grow. Information on all raw materials, food contact packaging, and finished products associated with a recall are collected and documented at a minimum of 100%. Trace shall be completed within two (4) hours of receiving notification of a recall.

Mock recalls or product traces are performed at least annually to monitor the effectiveness of our ability to trace products should a recall ever become necessary.

Recall Coordinator:

Riot Quinn
Quality Manager

Phone: 201-941-8777
After hours: 206-854-0582
riot.quinn@iff.com

8.0 SAMPLE AND RECORD RETENTION

Grow collects a representative sample of all products produced. Samples are a composite taking equal samples from every 20-25 kg's produced and combined to a final composite sample. Samples are maintained following standard storage conditions for a minimum shelf life plus 1 year.

Production records are maintained based on the strictest regulatory requirements. Currently, that requirement is based on Organic regulations requiring records to be maintained for five (5) years.

9.0 ALLERGEN CONTROL

As part of food safety, an Allergen Control Plan is in place that includes the US allergens and their derivatives. Products are additionally reviewed for allergens based on the Country where the product will be sold. Allergen statements are provided on a product-by-product basis.

The Allergen control plan includes, cleaning procedures, cleaning verification procedures, and cleaning validation procedures.

Allergens are clearly labeled and segregated from non-allergens during storage. During production, all equipment is labeled with signs to indicate the type of allergen, and color-coded equipment is used where possible.

Equipment is cleaned following our standard cleaning procedures. Equipment is then swab tested using allergen protein testing swabs to ensure no proteins remain.

Grow follows Good Manufacturing Practices (GMPs) and allergen control strategies to minimize the potential cross-contact of food allergens. This includes, but is not limited to, HACCP, training separation of materials, and sanitation. Standard operating procedures are in place to prevent cross-contamination of non-allergenic products.

10.0 SANITATION

A written Master Sanitation schedule for periodic cleaning of the facility is implemented and documented. This includes zone 2, 3, and 4 cleanings. Zone 1 cleaning is completed based on the use of the equipment. The cleanliness of the equipment is checked using ATP swabs after cleaning to verify sanitation. Cleaning records are maintained both in electronic and paper formats.

11.0 ENVIRONMENTAL MONITORING

An Environmental Monitoring Program is in place to monitor the facility's environment for Salmonella. Monitoring of both processing and non-processing areas is conducted using scientifically acceptable methods. Grow uses a risk-based analysis to determine the frequency and location of testing sites. The overall purpose of the program is to seek out possible contamination and eliminate the threat.

The monitoring plan includes a zoned approach, swabbing sites, targeted organisms, action levels, and corrective action responses. Samples are taken during normal times of operation to assure results represent environmental conditions throughout the operation cycle.

12. ETHICAL CONDUCT

As an affiliate of International Flavors and Fragrances, Grow abides by a strict Ethical Code of conduct. This Code of Conduct includes Anti-Bribery, Anti-Corruption, ethical sourcing and practices, and fair labor practices.

Raw materials are not knowingly sourced from suppliers involved in slavery, human trafficking forced child labor, or illegal child labor.

Grow does not use slavery, human trafficking, forced child labor, or illegal child labor in any step of the production of products. We comply with all Global, Federal, State, and local laws regarding labor laws.

13. PEST CONTROL

Grow contracts with a licensed pest control company to exclude and control conditions that may encourage pest activities. Pest control services are compliant with GFSI, Federal, State, and local regulations. No pesticides are sorted on site, and only approved pesticides compliant with Organic regulations may be used on site. The use of any pesticides is strictly done by the pest control provider.

14. TRAINING

All employees receive training on GMP's HACCP, Allergens, Food Defense, Food Fraud, and Safety on their first day of employment, and annually thereafter. Employees receive additional on-the-job training, specific to their position. Training is provided using several methods including written, visual, lecture, and hands-on.

15. NON-CONFORMANCE

All complaints are logged into our non-conformance log. All complaints are investigated with all information being added to the non-conformance record. When appropriate, root causes, corrections, and Preventive actions are logged within the non-conformance record.

16. ANIMAL TESTING

Grow is committed to the ethical treatment of animals. As such no ingredients or products have been tested on animals.

17. FSVP & SOURCING

Grow is committed to using the highest quality ingredients. A risk assessment is conducted on all manufacturers, brokers, and ingredients. This assessment includes compliance with FSVP when applicable, ethical practices, food safety, and security.