INTRODUCTION

To all Valued Partners:

J&J Snack Foods Corp. is the largest manufacturer of soft pretzels in the world with a wide range of delicious varieties. Our success in the pretzel business has also given way to the expansion of products in other niche snack foods, baked goods, frozen novelties and frozen beverages. We rely on our network of manufacturing facilities, suppliers, distributers, and co-manufacturers to produce the highest quality, wholesome, and food-safe products to serve our foodservice and retail customers across the country and internationally. Our manufacturing system focuses on industrial performance fundamentals in order to build a culture of continued, sustainable improvement in the areas of food safety and quality.

At J&J, we are committed to the operation of a socially responsible workplace, are compliant to all applicable regulatory requirements and industry standards, and continue to advance our sustainable business practices to reduce the environmental impact of our operations. As a trusted member of our supply chain, it is your responsibility to adhere to our expectations and conduct your business operations in a responsible and ethical manner. To help our members share in our commitment and execute our objectives, we have created the J&J Snack Foods Corp. Supplier Requirements Manual (JJSF SRM).

The JJSF SRM contains an overview of the essential elements that we believe are crucial for the effective management of food safety, quality, and food defense plans. These are minimum requirements and are not intended to lessen or eliminate any requirements that may already be in place due to any other contract, specification, or regulatory body. The execution of these requirements must be facility specific and all locations supplying J&J Snack Foods Corp. with raw materials, ingredients, or packaging materials must meet the requirements of this manual.

We believe that we must have clear communication throughout our entire supply chain to be a successful provider of safe and quality food products and we thank you for your interest in partnering with us in this endeavor. Please sign the Supplier Acceptance Statement and return to the Regulatory Compliance Department at regulatorycompliance@jjsnack.com.

Robert Cranmer
VP of Operations

Deb Kane
Sr. Director of FSQA & Regulatory

Partners in Food Safety and Quality

Supplier Requirements Manual

Effective January 2021

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1.0 MANAGEMENT

Suppliers must have a documented food safety and quality management system in place that includes a signed policy stating their commitment to supply a safe and quality product, the programs implemented to ensure compliance with all applicable regulatory and JJSF requirements, and objectives to continually improve the food safety and quality system. The food safety and quality policy must be communicated and understood by all levels of management and employees.

Suppliers must maintain a documented organizational hierarchy that identifies those employees who have responsibility or authority for food safety and quality. All levels must be clearly defined including individuals involved in management, performance or verification of food safety and quality control measures. Appropriate provisions must be made to cover for the absence of key personnel (i.e., back-up personnel must be identified).

Suppliers must designate a management representative who is responsible for: 1) establishing, implementing, maintaining, and improving a food safety and quality system, 2) reporting the performance of the food safety and quality system to plant and senior management at least monthly, and 3) reviewing the entire food safety and quality system at least annually.

Change Notification

Suppliers must have a documented system to manage any/all changes affecting JJSF, including, but not limited to: materials, formulas, specifications, processes, equipment, management and/or production facilities. Suppliers must communicate to JJSF any changes that have a potential impact on food safety, quality, and/or processing or may adversely impact JJSF.

Crisis Management and Business Continuity

Suppliers must have documented procedures designed to report and effectively manage incidents and potential emergency situations that impact food safety, quality and regulatory issues including plans to manage recall and retrieval activities. A multidisciplinary crisis management team of individuals whose roles and responsibilities are well defined must be established and activities documented. In addition, suppliers must NEVER initiate a recall of any JJSF product without prior authorization from JJSF.

Suppliers must have a documented plan in place to continue with business operations due to interruption of critical functions because of a potential known natural danger (i.e., flood, fire, or other severe weather incident) or an unforeseen event. The plan must specify where manufacturing would take place if the usual facility became inoperative. Suppliers must ensure that any alternative facilities comply with the food safety and/or quality requirements as detailed in this manual and notify JJSF in the event an alternate facility will need to be used.

Certificate of Insurance

Suppliers must have a current Certificate of Insurance with JJSF listed as Additional Insured under GL & AL and adhere to the following criteria:

- WC Statutory
- Employers Liability $1,000,000
- Automobile Liability $1,000,000
- General Liability $1,000,000
- Umbrella over EL, AL & GL $5,000,000 to $10,000,000
- All insurance with carriers having an A.M. Best Financial Rating of “A” or Better

2.0 DOCUMENTS, DATA, AND RECORDS

Document Control

Suppliers must document and maintain procedures to control and secure all documents, data and records relating to daily operations. This includes, a summary of the supplier's food safety policies, procedures, prerequisite programs, and other documentation necessary to support the development, implementation, maintenance, and control of the food safety system.

These procedures must ensure that:

- Current documents are available on-site at each facility (hard copy or electronic)
- Out-dated or obsolete documents are removed from circulation to prevent unintended use
- A register of food safety & quality documents must be kept current and maintained

Data Collection

Data for food safety and quality controls (e.g., analytical tests, monitoring, verifying, audits, inspections, reviews, etc.) must be collected and recorded automatically or manually by trained personnel. Data must be recorded in real time when the activity is conducted. Food safety and quality records must be written legibly in indelible ink (no pencils permitted) or entered electronically in a secure system. Records must be signed/initialed and dated by the person completing the task/activity. Electronic systems used for food safety records (without a paper trace) must be validated, storage backed up, and in compliance with local regulations. For any documentation related to product manufactured for or with JJSF, the supplier must ensure that access is secured and restricted from unauthorized personnel or outside sources.

Record Retention

Suppliers must maintain records for two years or for the time required by other regulatory bodies if greater. Records must be: stored in a secure area, easily retrievable, and available for review during audits or inspections by JJSF representatives. Record retrieval must be tested and documented during mock recall exercises.

Suppliers may be required to keep retain samples of the product(s) produced. Samples must be representative of the production run and stored up to the shelf life of the product. Specific sampling and storage requirements may be provided by JJSF Quality and/or Research & Development representatives.

3.0 SPECIFICATIONS & PRODUCT DEVELOPMENT

Specifications

Suppliers must develop and maintain documented specifications taking into consideration all ingredients, additives, hazardous chemicals, packaging and processing aids that may impact finished product safety and quality. Suppliers must maintain Letters of Guarantee, Certificates of Analysis, Certificates of Conformance, or equivalent, or sampling and testing results when applicable, for all incoming raw materials, ingredients, and packaging to assure that supply chain controls are in place and all regulatory requirements are met; and provide the same documentation to JJSF representatives upon request. Suppliers must deliver materials that meet JJSF specifications. If the Supplier anticipates that it will not be able to meet the agreed upon specifications or time restraints, then the Supplier must notify a JJSF Purchasing representative immediately.

Product Development

Suppliers must have documented product development programs in place for managing the innovation of new products including validation by site trials, shelf life trials and product testing; and for any changes to current or existing products. Records of all product design, process development, shelf life trials and approvals must be maintained.

4.0 CO-MANUFACTURING

Suppliers who co-manufacture for JJSF must provide notification of any products, ingredients or packaging materials supplied to JJSF which are produced in a plant not owned and/or operated by the Supplier/co-manufacturer. Co-manufacturing locations must meet GFSI food safety and quality requirements, the requirements of this manual, all specifications for products and packaging, and consent to be audited by representatives of JJSF, if necessary or if considered to be high risk.

All co-manufacturers or co-packers retained by the primary supplier to produce a product for JJSF must carry the same insurance coverage and assume the same indemnification of JJSF as the primary supplier. Records of contract reviews and changes to contractual agreements and their approvals must be maintained. A documented procedure must be in place for the controlled disposal of trademarked materials and the disposal process must be reviewed annually to confirm compliance if a contracted disposal service is used. Co-manufacturers must not conduct analytical testing on JJSF finished products without prior discussions and approval from JJSF Supply Quality Representatives.

5.0 FOOD SAFETY & HACCP PLANS

Food Safety Plans (FSMA Required)

Suppliers must develop a Food Safety Plan (FSP) based on well-established food safety principles. The FSP must consist of documented preventive controls for food safety hazards to prevent or minimize the likelihood of foodborne illness or injury from products, ingredients or packaging materials supplied to JJSF. Suppliers operating under USDA/HACCP regulations for meat and poultry, Seafood HACCP, or Juice HACCP, are exempt from the Preventive Controls Rule for Human Food regulation (which require an FSP) but will still need to maintain validated/verified HACCP plans.

The FSP must be developed by a multidisciplinary food safety team responsible for the plan's development, implementation, reviews/revisions, and employee training and overseen by a PCQI (preventive controls qualified individual).

All Food Safety Plans must include:

1. A hazard analysis (should be HACCP-based) to identify and control the hazards associated with the material or process; a comprehensive process flow diagram of the facility's operating system(s); documentation of all prerequisite programs that may be used to maintain hazard control and if no hazards exist, the Supplier must provide documentation of hazard control justification as part of the plan; and records of verification of hazard control for accuracy.
2. The hazard analysis must identify whether there are hazards requiring a preventive control. This hazard analysis must be written even if no hazards are identified which require a preventive control.
3. When the hazard analysis identifies hazards requiring a preventive control, the FSP must include documentation for each preventive control as appropriate to the facility and the food, to ensure safe food is produced, including:
    a. Process controls-process CCPs and controls at other points that are not CCPs
    b. Food allergen controls-to eliminate allergen cross-contact
    c. Sanitation controls-procedures in place to prevent microbial cross-contamination and/or allergen cross-contact
    d. Supply chain controls-hazard analysis of all incoming raw materials, ingredients, and packaging materials including biological, chemical/radiological, and physical hazards; and considering economically motivated hazards, such as, intentional adulteration

e. Recall plan-the procedures followed to recall a product if a potentially hazardous situation is discovered

4. Procedures for monitoring the implementation of the preventive control
5. Corrective action procedures or allowable corrections, as appropriate to the nature of the hazard and the nature of the preventive control
6. Verification procedures, as appropriate to the nature of the preventive control and its role in the facility's food safety system

Each facility must maintain the documentation used to support the development of the FSP Plan (i.e., historical and known hazards associated with specific food products, challenge studies, the latest scientific/industry literature, customer requirements), including all manufacturing records related to the FSP activities, such as CCP monitoring, verification, and corrective action activities, if necessary. All FSP records (including electronic records) must be reviewed for compliance, signed, and dated by a designated individual who has been trained on HACCP principles prior to the release of product for distribution (or before product is out of the facility's control). The plan must include the actions to be taken if the product does not meet critical or operating limits.

According to the Food Safety Modernization Act (FSMA) requirements, all HACCP and FSP records must be maintained for a minimum of 2 years and be accessible within 24 hours if requested. The effectiveness of the FSP Plan must be verified by the FSP team annually or each time products, processes, or equipment change, or when new products are added to the plan. The updated plan with any changes or revisions must be reviewed and signed by the designated FSP Coordinator at least annually.

FSP and HACCP References

Codex Alimentarius (CAC/RCP, 1-1969, Rev 3 (2003))
http://www.codexalimentarius.net/web/standard_list.do?lang=en

U.S. Food & Drug Administration Title 21 of the Code of Federal Regulation Part 117—Current Good Manufacturing Practice, Hazard Analysis, and Risk-based Preventive Controls for Human Food
https://www.ecfr.gov/cgi-bin/text-idx?SID=f86829de3e644ee2acfead4c48ce4f96&mc=true&node=pt21.2.117&rgn=div5

U.S. Food & Drug Administration (HACCP Principles & Application Guidelines, Adopted 08/14/97)
https://www.fda.gov/Food/GuidanceRegulation/HACCP/ucm2006801.htm

6.0 GMP's/GLP's

Good Manufacturing Practices

Suppliers must establish and maintain a documented GMP program that controls conditions where materials and products are handled, stored, packed, and delivered to maintain food safety and quality. Suppliers must document and communicate the GMP requirements to all plant personnel, visitors, maintenance, and outside contractors prior to entering any facility where product is manufactured, stored, and distributed. Such requirements must be prominently posted within the facility, and continually monitored by trained employees. The Supplier GMP's must address, at a minimum, the following requirements:

1. Illness: ill individuals/suspected carriers of infectious diseases are not permitted to engage in the processing or packing of food, or entrance to storage areas where food is exposed
2. Hand Washing: performed upon entrance to the production facility and after each absence or activity where hands are potentially soiled (e.g., eating, drinking, handling dirty items, using the restroom)

3. Fingernails: kept clean, short, and without polish; false fingernails and nail art not permitted
4. No jewelry, visible body piercings, or watches permitted (exceptions: plain wedding band and medical alert necklace); false eyelashes not permitted
5. Sores/cuts on exposed skin: must cover with waterproof, highly visible colored bandage containing a metal detectable strip (bandages, by lot, must be challenge tested through detection machines)
6. Uniforms/Clothing: must be clean with no pockets above waist or button closures, provide suitable coverage, and be in good repair; disposable aprons/other protective clothing may be worn
7. Footwear: must be closed toe, low heel, non-slip
8. Gloves (if used) must: not be of latex material, be replaced regularly when damaged or excessively soiled, be suitable for food use, provide adequate product contamination controls, and be a distinct color (e.g., blue)
9. Hairnets (in processing areas): must be single use, cover all hair and be worn over the ears
10. Beard Guards/Snoods/Masks (in processing areas): must completely cover facial hair (if not clean shaven)
11. Eating/Drinking: restricted to designated areas only
12. Smoking/Smokeless Tobacco Products: restricted to designated areas; disposed of properly
13. No temporary fasteners permitted in the processing areas (e.g., staples, safety pins, paper clips)
14. Personal items: not permitted in the processing areas
15. Chemicals (if used): must be clearly labeled and properly stored in a restricted access area or locked cabinet
16. Equipment, tools and containers: must be used and stored in a way to prevent cross-contamination/cross-contact; and cleaned/sanitized when soiled
17. Food containers or packaging materials: must not be used to store non-food items
18. Housekeeping: must be an ongoing process conducted to prevent product contamination

Suppliers must develop and maintain a preventive maintenance program that effectively minimizes food safety and quality risks to product, packaging, and equipment. Suppliers must ensure maintenance work and temporary repairs do not become a source of contamination by following documented procedures for notifications of work to be completed and sign-offs by QA. Tools and maintenance equipment must be maintained in a sanitary condition, food-grade lubricants and greases must be used and stored properly, and all contractors and maintenance personnel must meet the requirements of the GMP Program while working on the premises.

Good Laboratory Practices

Good Laboratory Practices (GLPs) must be followed by all Supplier internal laboratories and third-party laboratories who perform testing on ingredients, packaging, and/or finished products used and/or produced for JJSF. All laboratories must have documented testing procedures based upon official test methods, or test methods which have been validated with GLP requirements as dictated by the applicable regulatory body (e.g. EPA, FDA, AOAC). All labs must be accredited for the tests they are performing.

7.0 QUALITY PLANS (and IDENTITY PRESERVED FOODS)

Suppliers must develop a food quality plan that may be combined with, or be independent from, the food safety plan. Plans must separately identify quality threats (an identified risk that has the potential to affect the quality of the product but does not cause illness) and their controls, and critical quality points (CQPs) and control points (CPs). The food quality team must identify and document the quality limits that separate acceptable from unacceptable product. An effective quality plan may include the following parameters:

1. Product specifications
2. Sensory attributes
3. Color
4. Product size dimensions
5. Moisture
6. Water activity
7. Net weight
8. Lot Code
9. Package seals
10. Others as applicable to the product

Suppliers must have an effective method of monitoring quality parameters and conduct verification procedures at least annually, or when changes to the process, equipment, or specifications occur which may affect product quality.

Identity Preserved Foods
Suppliers must have documented procedures for the identification and processing of food products requiring the preservation of their identity preserved status (i.e., Kosher, Halal, organic, Non-GMO, free from, free trade, etc.). Identification must include a statement of the product's identity preserved status of all ingredients, including additives, preservatives, processing aids and flavorings, and Letter of Guaranty must be assured. Suppliers must include identity preserved raw material or ingredient specification requirements for handling, transport, storage, and delivery prior to use.

The product's identity preserved status must be maintained during processing or manufacturing:
1. Ingredients must be physically separated from those ingredients identified as incompatible with the identity preserved food
2. Processing must be completed in a separate room; or scheduled as the first production run; or produced after complete and thorough sanitation of the area and equipment
3. Finished product must be stored and transported in separate units or isolated by a physical barrier from non-specialty product
4. Identity preserved finished product must have the appropriate specific identity preserved certification displayed on the appropriate label

8.0 QUALITY MONITORING TOOLS

Suppliers must have an effective system of food quality program verification. Validation activities must include necessary activities to authenticate quality critical limits, process controls, and other quality tests established to meet customer requirements. Records of validation of quality criteria must be maintained. Non-compliance of quality critical limits and deviations from quality requirements must be identified using identification of the root cause and appropriate corrective and preventative methods.
Statistical process control methods should be used to effectively control and optimize production process efficiency, product quality and reduce waste. Control charts must be used for key processes and have defined targets and upper and lower control limits (i.e., within three standard deviations on each side) and be authorized by designated personnel.

Suppliers must include food quality plans, process controls, quality tests, and other activities implemented to meet JJSF finished product specifications in their internal audit plans and inspections. A sensory evaluation program must be in place to ensure alignment with agreed JJSF requirements.

9.0 SUPPLIER AND INCOMING MATERIALS

Suppliers must ensure *their* suppliers comply with the requirements and expectations as detailed in this manual or equivalent.

Supplier Management

Suppliers must have a documented supplier approval and monitoring program to ensure that all their suppliers are effectively managing food safety and quality risks to raw materials, ingredients, and packaging materials and have an effective traceability process. An annual risk assessment must evaluate the likelihood for: allergen cross-contact, physical, microbiological or chemical hazards, and intentional adulteration. The supplier approval procedure must include one or more of the following; GFSI-recognized certification, other third-party food safety and quality audits, or for low risk assessed suppliers, a comprehensive questionnaire or food safety documentation review.

Suppliers must maintain a current list of approved suppliers. Where raw materials are purchased from agents, brokers, or traders, the Supplier must know the identity of the last manufacturer, packer or consolidator and be able to provide GFSI certifications and other applicable food safety documentation.

Foreign Supplier Verification Program (FSVP)

Suppliers must ensure that foreign suppliers have a documented system in place that provides the same level of public health protection as the FDA Preventive Controls for Human Food Rule. The FSVP importer must be identified at point of entry and documented.

Approval of foreign suppliers must be based on:

1.) Evaluation of the supplier's performance
    a.) Procedures, processes, and practices related to food safety
    b.) FDA food safety regulations and supplier compliance
    c.) Supplier's food safety history
    d.) Other relevant factors such as storage and transportation practices
2.) Risk assessment of each imported good
    a.) Hazard analysis of each ingredient
    b.) Appropriate labeling of allergens
    c.) Susceptibility to adulteration, economic or otherwise

Supply chain preventive controls must be applied when the Supplier, or its customers, are not controlling the hazard. Unapproved suppliers may be used on a temporary basis, when necessary, if the food is subjected to adequate verification activities before importation, such as: review of food safety program/documentation or third-party audits. Suppliers must reevaluate the risk posed by the imported food and the supplier's performance every three years, or sooner if there is a change in foreign supplier performance or new risk information.

Incoming Materials and Specifications

Suppliers must maintain an approved supplier list, written specifications for raw materials, ingredients, and packaging materials, and documented controls must ensure purchased materials conform to JJSF specifications and applicable regulatory requirements. Incoming material acceptance and its release for use must be based on one or a combination of: product is from approved supplier, sampling and testing, visual inspection upon receipt, and certificates of analysis/conformance. The parameters for acceptance must be clearly defined, implemented, and reviewed. Suppliers must have a documented process for purchased materials that do not meet requirements or specifications (i.e., HOLD status, quarantine, rejection) to ensure that an unacceptable material does not enter the JJSF supply chain.

Suppliers must have a system in place to notify JJSF, in writing, of any ingredient or packaging material specification and/or supplier changes.

10.0 NON-CONFORMING AND WITHHELD PRODUCT

Suppliers must develop and maintain a documented non-conforming material management program to effectively prevent the usage or shipment of non-conforming products, ingredients, or packaging materials to JJSF. These documented procedures must include:

1. Potentially non-conforming product must be reported to quality management immediately upon discovery and placed on HOLD
2. Non-conforming product must be clearly identified with the direct labeling of a HOLD tag or by electronic inventory system
3. Materials with HOLD status must be secured in a segregated storage area to prevent accidental release
4. Responsibility for decision making on the use or disposal of non-conforming product must be defined (i.e., destruction, reworking, downgrading to an alternate level, or acceptance)
5. Records of the decision on use or disposal; and record of destruction due to a food safety reason, must be maintained
6. Responsibility for communication of non-conforming status within the supply chain, and JJSF, if applicable, must be clearly stated

Each non-conformance that led to a product or material hold must be evaluated for root cause. Corrective action must be taken and documented to prevent reoccurrence.

11.0 TRACEABILITY AND MOCK RECALL

Suppliers must maintain a documented traceability program that meets all regulatory requirements and effectively traces specific lots of raw materials, ingredients (including bulk ingredients), packaging, and finished products from its suppliers through all stages of processing and distribution to its customers and vice versa.

Traceability

Suppliers must assure that finished product is traceable back to the supplier (one back) and forward to the customer(s) (one up). Traceability must specify the steps within the manufacturing system followed; such as processing aids, bulk storage, work in process (WIP), rework, etc., and procedures must identify all materials (incoming materials, in-process batches, rework, and finished product) as they move through the manufacturing and delivery stages. Refer to section *21.0-Coding and Labeling* for more details on product identification. This system can be manual or electronic provided that the time required to access the information maintains in compliance with regulatory and/or JJSF expectations.

A trace of a material must be completed, and records made available as soon as possible; within four (4) hours (finished product) to six (6) hours (incoming materials). An effective trace must meet expectations, aligned with industry standards, as established by the Supplier and/or JJSF. If the trace fails to meet expectations, a root cause analysis must be performed, and corrective actions implemented, verified, and documented.

Mock Recalls

Suppliers must evaluate their traceability system regularly through the completion of mock recalls. Mock recall exercises should include ingredients, primary food contact packaging, and finished products and must be completed annually or at an alternate frequency that meets all regulatory requirements.

Mock recalls must be completed, and records made retrievable, within four (4) hours (finished product) to six (6) hours (incoming materials). Elapsed time must be recorded upon completion and if time expectations are not achieved, suppliers must perform investigation and corrective action, and a second mock recall may be necessary. Results of mock recalls must be documented and available upon request.

In the event of a true recall of supplied material, the supplier must immediately notify the appropriate JJSF representative. In the event of a recall of JJSF finished product, the Supplier will be contacted directly by JJSF. Suppliers must NEVER initiate a recall of any JJSF product without prior authorization from JJSF.

12.0 ALLERGEN CONTROL

Suppliers must have documented and effective allergen controls (i.e., procedures, practices and processes) and conduct allergen risk assessments as part of their HACCP or Food Safety Plans. When Food Safety Plans are required, preventive controls must be identified based on the risk assessments. Risk assessments must consider the ingredients used as well as all possible sources of allergenic cross-contact such as; individual line/work area (including those areas accessed by visitors/contractors), scheduling and changeovers, labeling, rework, dedicated or segregation of equipment/lines, processing room air flows, dust management, storage, and non-production areas, such as, locker rooms, vending machines, and lunch rooms.

The allergen risk assessment must include a review of traffic patterns for ingredients, packaging materials, equipment, tools/utensils/containers, waste, and employees, to evaluate the control of allergen containing products to prevent cross-contact during handling and processing. Suppliers must maintain a comprehensive list of all allergens managed and controlled at their facility. The following major food allergens must be controlled against cross-contact and declared on finished product labels:

1. Wheat and wheat products
2. Crustacean shellfish and their products (e.g., crab, shrimp, lobster)
3. Fish and fish products (e.g., bass, flounder, cod, salmon)
4. Eggs and egg products
5. Milk and milk products (including lactose)
6. Peanuts and their by-products
7. Tree Nuts and nut products (e.g., almond, walnut, pecans)
8. Soybeans and their by-products (including soy lecithin and soy flour)
9. And Sulfites in concentrations of 10 mg/kg or more

Highly refined, hot-solvent extracted, bleached, and deodorized oils derived from any of the above may be considered non-allergenic if documented as such from the oil supplier.
Note: cold pressed oils ***are*** considered an allergen risk.

Allergenic ingredients must not be placed above non-allergenic products or different allergens in storage, and documented procedures must be followed to manage cross-contact. All raw ingredient containers must have lids or be sealed. When possible, allergen containing ingredients should be stored in segregated areas. Horizontal separation should be maintained between ingredients that do not contain identical allergens; barriers or sheeting may be used as needed.

Suppliers must have a system to prevent allergen cross-contact of tools, utensils or containers (i.e., color-coding and/or clearly labeled and dedicated items e.g.., brushes, scoops, shovels, buckets, etc.). Signage must be posted in the facility describing the color-coding and/or label identification system. All non-dedicated tools, utensils, and containers must be cleaned adequately using a validated cleaning method.

Suppliers must develop an effective production schedule to prevent allergen cross-contact and ensure sufficient time for product changeovers and allergen cleaning. The production schedule must allow for allergen containing products to follow non-allergen containing products. Where possible, allergens should be isolated to separate or designated lines. Allergen cleaning procedures specific to each facility's manufacturing requirements, equipment, and environment must be developed and maintained. The facility must be responsible for validating the effectiveness of cleaning procedures, instructions, and materials that will result in the adequate removal of the allergen(s).

Suppliers must conduct an allergen self-assessment annually and when new ingredients, new or re-formulated products are introduced, processes are new or modified, equipment changes, and changes in chemicals or sanitation procedures occur. Suppliers must contact JJSF representative if new allergens are introduced to the ingredient.

13.0 TRAINING

Suppliers must have an effective training program, in a language(s) relevant to staff, for all personnel including full time, seasonal, part-time, temporary, and contractors, to assure they have the required competencies to carry out those functions affecting product food safety and quality. A training register, including a list of participants, completion date, training contents, and effectiveness evaluations to prove competency, must be documented and maintained.

The frequency of training must be determined by employee competency and performed at least annually; or may be the result of audit findings and/or product non-conformances, out-of-specification results, consumer/customer complaints, or corrective actions for non-compliances. Retraining to a specific topic, coaching, mentoring and/or on-the-job training can be valid methods of refresher training if documented.

14.0 SITE REQUIREMENTS

Supplier manufacturing and warehouse locations must be of adequate design and construction to ensure production and storage of safe and high-quality materials. All product contact surfaces, and non-product contact surfaces including, raw material storage, packaging material storage, and cold storage, must be constructed of materials that will not contribute a food safety risk. The facility grounds including all building structures and utilities must be maintained to prevent pest harborage, food safety and food defense concerns. The location and design of restroom/handwashing facilities, drains, waste receptacles/disposal areas and sanitation stations must be adequate to comply with Good Manufacturing Practices.

Suppliers must ensure safe provision of site utility services including environmental air, compressed air, potable water, steam, and centralized hydraulic systems in food production areas. An effective maintenance program must monitor and document the controls, testing standards based on risk, and corrective action limits, if applicable, of all utilities on a periodic basis. Shatterproof light fittings or those protected by a shatterproof covering must be used to avoid product risk. Emergency lighting, forklift lights, and other work lights must be adequately protected or controlled.

Waste must be removed on a regular basis; segregated, stored, and disposed of to minimize the development of odors and pest activity; and to protect against contamination of food ingredients, packaging materials, food contact surfaces, water supplies, and ground surfaces. Waste must be removed from food storage or processing areas as often as necessary to prevent accumulation and all spillages must be cleaned up as quickly as possible. Suppliers must document waste management inspections and programs.

15.0 EQUIPMENT MAINTENANCE & CALIBRATION

Suppliers must implement maintenance programs which include: a preventive maintenance schedule, procedures for equipment installation, and repairs of building, equipment and premises critical to food safety and quality. Temporary repairs, where required, must be maintained in a sanitary condition and must not become permanent solutions. Construction/maintenance projects performed by site personnel or contracted individuals must be effectively managed and controlled in order to prevent product contamination or food adulteration issues.

Suppliers must develop and maintain a documented calibration program to evaluate the performance of operational measuring devices (e.g., metal detectors, thermometers). The program must meet any applicable regulatory and industry requirements and must include the documentation of corrective actions to address the use of a non-calibrated or inaccurate measuring device.

Facilities must maintain a log or similar record of critical (related to food safety, quality, and regulatory) equipment requiring calibration with all applicable information recorded. Procedures must be developed and maintained for all internally calibrated equipment utilizing manufacturer recommendations. External calibration facilities/laboratories must have independent third- party accreditation to recognized standards. Internal calibration records and external calibration certificates must be maintained for inspection and measuring.

16.0 PEST CONTROL

Suppliers must have implemented a written pest management program to monitor and control pest activity in the facility and the surrounding area effectively. If pesticides are used, the Supplier must ensure that they are used in accordance with local regulations and that pesticide residues do not exceed limits established by the law of both the location of the facility and the location where JJSF will receive the material. The Supplier must ensure that appropriate measures are taken to prevent pesticides from contaminating food products. If pest control is contracted out to a third party, only competent, licensed and insured companies must be used.

The pest management program must maintain the following documentation, at minimum:

1. Current site map with all numbered pest control device locations and type of device clearly identified
2. Approved pesticide usage list
3. Safety Data Sheet (SDS) for all pesticides used
4. Copies of labels for all pesticides
5. Instructions for usage of all pesticides
6. Pest control operator (PCO) license (expiration date, certification, or training details)
7. Pesticide applicator's proof of insurance
8. Evidence of pest activity (e.g., insects, rodent droppings, trap and/or bait station activity, etc.), trending analysis by location, and corrective/preventative actions between the facility and PCO

Immediate action must be taken to eliminate the hazard if insect/rodent infestation is identified. Infested product/material must be controlled to prevent the potential contamination of other product/material, the facility, and surrounding area. Steps must be taken to minimize the presence of animals and birds on the property, especially near building exteriors and parking lots of commercial vehicles.

17.0 STORAGE AND DISTRIBUTION

Suppliers must have a documented storage and transportation plan for packaging materials, ingredients, WIP, and finished product to effectively maintain and secure product safety, integrity, quality, and prevent contamination.

Storage

Storage areas must be in good repair, be easily accessible for inspection, cleaning, and maintenance, and be adequately insulated to maintain temperatures as recommended by the manufacturer during all stages of storage and transportation. Methods for clear identification of raw materials and finished product in storage areas must be implemented to facilitate storage and maintain correct stock rotation.

Distribution

Supplier food transport vehicles must be designed/constructed to allow for hygienic and safe storage conditions of materials to protect food from being contaminated during transportation and enable effective cleaning and sanitizing of said vehicles. Cleaning records and previous load documentation must be available on request. Before loading, all food transport vehicles must be inspected, results documented, and all loads adequately secured. The temperature inside the food transport vehicle must be checked and documented when products must be transported at a specified temperature range and adequate temperature control must be maintained through transport. If temperature recorders are used, they must be clearly identified on the Bill of Lading (BOL)/packages and secured to the load.

JJSF will not accept delivery:

1. If non-food chemicals or other potentially hazardous materials are in the same vehicle as JJSF products
2. If the food transport vehicle has been at risk of contamination by hazardous, toxic, or unsanitary materials; allergen cross-contact; or adulteration

Suppliers must have a program in place to ensure the food transport/carriers used to transport JJSF products:

1. Protect raw materials from contamination with foreign material
2. Comply with the Sanitary Transportation Act and other regulatory transport practices
3. Receive on-going training for GMP, quality, food safety, and food defense
4. Actively monitor and document food safety control measures

18.0 FOOD DEFENSE, FOOD FRAUD AND PLANT SECURITY

Suppliers must establish and maintain a documented food defense program, food fraud prevention plan, and plant security program that specifies measures implemented to identify the food defense and food fraud vulnerabilities, mitigation strategies and their management. The plan must be re-evaluated annually and revised as necessary or when warranted by internal or external events, and/or if any relevant changes occur. In addition, food defense, food fraud, and plant security awareness training must be conducted for all employees.

The site's food defense plan must include methods, responsibility, and criteria for preventing food adulteration caused by a deliberate act of sabotage or terroristic incident and must also include measures to secure incoming ingredients. The site's food fraud prevention plan must include the methods, responsibility and criteria for identifying the site's vulnerability to food fraud. The food fraud vulnerability assessment must include the site's susceptibility to product substitution, mislabeling, dilution and counterfeiting which may adversely impact food safety.

Qualified personnel must be identified, and must conduct periodic, documented food defense and plant security inspections/assessments of the plant. The assessments/inspections must be evaluated, and as necessary, corrective and/or mitigation actions must be implemented.

19.0 PROCESSING

Processing

Suppliers must follow documented process control procedures to ensure compliance with all JJSF food safety, quality, and material specification requirements. Suppliers must ensure validated/verified thermal or anti-microbial processes where applicable. Statistical process control, if appropriate, should be used to assure that weight, content and/or quantity requirements are met for all finished products supplied to JJSF and to determine system capabilities. The most current process control procedures, product requirements, and specifications must be available to plant personnel as needed. In-process and finished products must be inspected, tested if agreed upon to meet purchase specifications and records must be kept for process data, inspections, and testing results. Certificates of analysis (COA), where required, must be provided to JJSF. The filling of containers/packages by weight, as well as the release of finished product, must be managed with a documented process in compliance with regulatory requirements.

Rework

The Supplier must have implemented a written program to control the use of rework materials (WIP and Finished Product) in any product supplied to JJSF. If rework is to be reincorporated into product as an 'in-process' step (not simply repackaging or re-casing finished product), then the rework usage conditions must be clearly documented in the product formula and/or specifications with prior approval from JJSF.

The rework usage conditions must include: the type/quantity/limit of rework added to the target product, conditions of storage, reprocessing steps and method for addition, identification of allergens, shelf life, special handling requirements, and lot number identification for traceability. If potential allergen-containing rework is identified, it must be segregated, controlled, and incorporated only into the same and/or appropriately labeled product. Appropriate stock rotation practices must be followed to ensure that the oldest rework is used first.

Suppliers must incorporate the rework usage step to Food Safety and/or HACCP process plans/diagrams and maintain records of all rework operations to maintain traceability.

20.0 PRODUCT AND CONTAINER INTEGRITY

Suppliers must implement a documented packaging program to assure finished product packages and containers are properly closed/sealed and protect the finished product from environmental and transportation conditions and potential adulteration. Bags should be glued closed whenever possible to minimize foreign material risk at our facilities. Material in contact with the food must meet appropriate regulatory requirements for food contact materials. Suppliers must ensure that the finished product has been approved/released through a label and packaging component review.

21.0 CODING AND LABELING

Suppliers must maintain a documented label control program to assure correct labels are received and stored properly. All labels must comply with applicable regulations, and JJSF purchasing specifications/requirements. At minimum, the program must address:

1. Label receipt and review against regulatory and JJSF approvals, where applicable, and internal specifications

2. Label review and verification must include, if applicable, accuracy of allergen statement, ingredient information, nutritional information, net quantity, or specific claims (i.e., Kosher symbol, organic, etc.)
3. Storage and use of labels
4. Unique identifying information on the labels must be clearly indicated and conspicuously marked on each unit

22.0 FOREIGN MATERIAL CONTROL

Suppliers must perform a risk assessment to determine potential sources of foreign/extraneous matter in all incoming materials as part of their food safety plan.

Suppliers must maintain a documented program for foreign material prevention and control in processing. The program must include maintenance, set-up, verification, and frequency of testing for all foreign material prevention and/or detection devices used by the Supplier. The program must contain guidelines for the prevention of contamination, disposition of materials with suspected or known contamination, and documentation of foreign material findings with root cause and corrective actions.

Suppliers must maintain a documented program to control glass and hard/brittle plastic. The program must identify equipment and other areas containing glass and hard/brittle plastic; and restrict the use of glass and hard/brittle plastic devices and supplies within the facility.

Wood must be excluded from all areas (i.e., food processing or other areas with exposed product) where potential for product or equipment contamination might occur. Suppliers must have a documented program detailing precautions against contamination if wooden pallets are in use.

All materials supplied to JJSF must undergo a foreign material prevention and/or detection step appropriate for the process and material (i.e., x-ray, metal detectors, filters, screens). Sensitivity (i.e., detection limits, screen sizes, magnet strength) of the foreign material prevention and/or detection step must be appropriate for the process and material. The detection limit for an end-point metal detector will depend on type of product, package, and the detection equipment. Detection equipment settings must be determined, according to manufacturer recommendations, and applied to achieve the most sensitive level possible to provide maximum protection from metal contamination. “Finished product” (unpackaged or packaged) metal detectors must be installed to provide the greatest probability of consistently detecting the smallest ferrous, non-ferrous and 316 series stainless steel metal contaminants which could be hazardous to the health of a consumer.

23.0 CUSTOMER & CONSUMER COMPLAINTS

Suppliers must have a documented program for handling customer/consumer complaints that includes responsibilities, response time and corrective actions based on complaint investigation. Complaints, recorded by product identification, production date, cause, and origin of complaint, and the subsequent investigations/corrective actions must be tracked and maintained in a log or register. Complaint data must be analyzed for trends by knowledgeable personnel, used to continually improve product safety and quality, and to avoid reoccurrence.

24.0 QUALITY INCIDENT REPORTING

Suppliers must have a documented program for identifying, assessing risk, and managing external food safety, quality, and regulatory incidents that may impact their incoming materials or manufactured products. The program must include: information of a possible incident received, incident leader

assignment, initial investigation performed, risk assessment conducted, affected product disposition determination (if applicable), and corrective actions completed, if necessary. All aspects of the investigation must be properly documented and communicated to JJSF immediately if any JJSF products are potentially affected.

25.0 SANITATION

Supplier must have a documented Sanitation program that ensures cleanliness of the food production environment, equipment and tools and be performed by trained/qualified personnel. The program must address:

1. Master sanitation schedules, procedures, and frequencies
2. Sanitation equipment and tools and correct usage
3. Equipment disassembly and re-assembly; description of CIP systems
4. Use of food grade cleaning/sanitizing chemicals including chemical concentrations, contact time, temperatures, frequencies, and rinsing procedures
5. Verification of Sanitation effectiveness and preventive controls
6. Hygiene (non-pathogen) monitoring programs
7. Inspection procedures, visual and verification tests (e.g., ATP)
8. Recordkeeping, record review, and corrections/corrective action plans

Environmental Monitoring Program (EMP)

Suppliers must have a documented environmental monitoring program (EMP) in place to verify the effectiveness of hygienic zoning and pathogen preventive controls in processes where food is exposed to potential cross-contamination. The EMP must depend on the product, assessment of microbiologically sensitive ingredients, and individual process risk evaluations of potential pathogen growth in the finished products or on equipment during manufacture or storage. Swabbing records must be maintained and must include, at a minimum, date, initials, location, area, results, and if necessary, corrective actions.

26.0 AUDITS AND INSPECTIONS

Suppliers must establish an internal audit program to assess and review compliance against regulatory/JJSF requirements and procedures related to food safety and quality. Internal audits must be conducted annually, at minimum, by qualified individuals independent of the area they are auditing. All audit findings and corrective/preventive actions must be documented, and follow-up activities must be conducted and reviewed to verify corrective/preventative actions have been completed.

All suppliers must have annual 3rd party GFSI audits performed on their food safety and quality systems. http://www.mygfsi.com/about-gfsi/gfsi-recognised-schemes.html. If any Supplier is unable or unwilling to achieve a GFSI recognized accreditation and for all other suppliers, they must provide another independent food safety and quality system audit report with corrective actions to a JJSF Supply Quality Representative.

Approved suppliers become part of a JJSF ingredient risk assessment and internal risk rating which dictates the frequency or need for audits/reviews. Suppliers must permit JJSF Supply Quality auditing representatives access to facilities used to manufacture, pack, or hold finished products, packaging materials, or ingredients and access to appropriate food safety system documentation as requested. These requirements include those facilities supplying to and through brokers as well as transport vehicles. Any audit/inspection may include review of records, processes, controls, and/or facilities. It is JJSF policy to give reasonable notice of intent to conduct an audit/inspection.

27.0 CONTINUOUS IMPROVEMENT

Suppliers must establish documented processes to continually improve the effectiveness and best practices of its food safety and quality management systems. At a minimum, production and product specification capabilities, non-conformances, internal/external audit results, and recalls/retrievals must be tracked, and appropriate measurement must be established to demonstrate the results.

JJSF will monitor the performance of our suppliers using various sources including: pre-shipment samples, incoming inspections, and COAs, etc., and develop a JJSF Supplier Scorecard. Supplier assessments/audits will be performed by the JJSF Supply Quality/Purchasing representatives based on risk assessments and/or volume of material used.

28.0 REGULATORY

Suppliers must immediately notify JJSF of any regulatory contact, sample collections, regulatory actions, or product retrievals which may be related to or impact products, packaging materials, or ingredients produced for JJSF.

If any Regulatory Agency samples 1.) a finished product produced for JJSF or 2.) ingredient or packaging material intended for use by JJSF; a duplicate/split sample must be taken at the time of collection and labeled with identification information; and all product represented by that sample must be placed on HOLD. The samples must be stored in a secure location that will prevent spoiling or contamination and the JJSF Supply Quality representative must be advised of the reason for the sampling. In addition, the JJSF Supply Quality representative will provide instructions prior to shipment to a JJSF facility or before continued sale of the sampled product under a JJSF label. A duplicate sample of the lot sampled by the Regulatory Authorities may be required by JJSF and must be made available on request. For supplier generated and owned ingredient or packaging materials, disposition of that material will be based on the regulatory agency decision with the supplier.

Suppliers must be aware of changes to legislation and regulations as well as relevant scientific and technical developments. A process must be in place for updating procedures/internal documents and complying with changes as appropriate. The Supplier must ensure all product intended for JJSF is compliant with all appropriate and relevant regulations.

29.0 SUSTAINABILITY

JJSF has adopted a program to minimize its environmental impact across its many facilities by advancing its sustainable business practices to meet current needs while supporting future generations. We expect our network of suppliers to adhere to sustainable business practices to reduce the environmental impact of their operations.

At a minimum, Suppliers must fully comply with all local environmental laws and regulations and should strive to conduct their operations in a way that conserves natural resources. All required environmental permits and registrations must be kept current and reporting requirements must be followed.

Suppliers should reduce waste and usage of all types by the implementation of appropriate conservation measures in their operations (i.e., waste reduction, recycling, energy conservation and greenhouse gas mitigation policies) and records properly maintained.

30.0 CORPORATE SOCIAL RESPONSIBILITY

JJSF is committed to upholding human rights by treating all employees fairly, honestly, and with full respect by operating in full compliance with all safety, discrimination and ethical labor practices; and by establishing and encouraging a culture of corporate philanthropy and community volunteering. We recognize that our Suppliers play a role in helping us to achieve these high standards of responsible and ethical behavior in our operations and encourage them to achieve a similar commitment.

We expect the workplace of our Suppliers to be consistent with legal and industry requirements in the areas of human rights, ethics, and non-discrimination. Suppliers must adhere to the laws in the country, state, etc., in which they operate, including those pertaining to employee health and safety, terms and conditions of employment, and mandated wages and benefits.