

## **WESTON FOODS FOOD SAFETY PROGRAM SCHEDULE**

### **PURPOSE**

WF Bakery Inc. and Weston Foods US, LLC and its subsidiaries (“Weston Foods”) strive to maintain the highest food safety and quality standards. To help meet these goals, we have created the Weston Foods Food Safety Program (the “Program”). The objective of the Program is to make certain safe, high quality, and consistent products reach our customers and consumers. To that end, we are partnering with our suppliers to ensure best in class food safety and quality standards, including an effective traceability program and full compliance with regulatory requirements such as the Food Safety Modernization Act (“FSMA”) and Safe Foods for Canadians Act (“SFCA”) are incorporated into the Program and into our products.

This Schedule highlights important details of the Program, which our suppliers acknowledge and agree to adhere to, and is standard for all suppliers. Note that this Schedule may not encompass the entirety of the Program or other food safety-related requirements as specifically agreed to between Weston Foods and its suppliers.

### **SCOPE**

The supplier shall follow this Schedule as per the requests of the Weston Foods Food Safety Supplier Program Department (the “Department”). Where requested, appropriate representative samples shall be supplied to the Department or Weston Foods’ approved third-party laboratories for testing. Additionally, supplier may be requested by Weston Foods to allow third-party facility audits from a Weston Foods-approved auditing firm, as per this Schedule and Weston Foods’ standard Purchase Order Terms and Conditions and other agreements between Weston Food and its suppliers.

This Schedule and the standards set forth by the Department supplement but do not supersede any rights or obligations established in the Purchase Order Terms and Conditions or in any agreement Weston Foods may have with our suppliers.

### **RESPONSIBILITY**

It is responsibility of the supplier to ensure compliance with and execution of this Schedule and provide Weston Foods with proper action plans, where requested, for approval prior to implementation.

### **SECTION 1 THIRD PARTY FOOD SAFETY CERTIFICATION**

#### **1.1 GLOBAL FOOD SAFETY INITIATIVE (GFSI) CERTIFICATION**

Weston Foods requires suppliers to maintain GFSI recognition by location as a minimum standard of food safety certification. Supplier shall provide its GFSI audit report and certification to Weston Foods prior to supplier approval and will maintain its annual certification.

Where there is no GFSI certification for the location, the supplier is required to submit a schedule for compliance with the GFSI certification. For more information about GFSI certification, visit <http://www.mygfsi.com/schemes-certification/recognised-schemes.html>.

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## 1.2 OTHER THIRD PARTY FOOD SAFETY CERTIFICATION

Any manufacturer/supplier supplying ingredients or packaging to Weston Foods without GFSI certification will be required to submit to a third-party food safety audit that meets GMP and HACCP requirements and/or a Weston Foods supplier audit initiated by the Weston Foods' Senior Program Manager.

## 1.3 QUESTIONNAIRE

If the supplier is not GFSI certified or does not have acceptable third-party food safety audit certificates that meet GMP and HACCP requirements, a secondary level of criteria must be met for approval in our Weston Foods system, and a questionnaire must be completed prior to facility approval. The questionnaire is a screening tool used to conduct a Food Safety Risk Assessment and determine the approval status of the supplier.

## 1.4 WESTON FOODS SUPPLIER AUDIT

The Department may conduct a supplier audit depending on the supplier's risk level as determined by the Food Safety Risk Assessment.

## SECTION 2 SUPPLIER FSMA IMPLEMENTATION

FSMA was signed into law on January 4, 2011 and aims to ensure the U.S. food supply is safe by shifting the focus from responding to contamination to preventing it. Please find below link for more information about FSMA and implementation:

<http://www.fda.gov/food/guidanceregulation/fsma/default.htm>

### FSMA Requirements

Each Weston Foods supplier shall complete a risk-based hazard assessment based on FSMA requirements and incorporate this process into their Food Safety Plan with appropriately identified Preventive Controls.

#### *Preventive Controls for Human Food*

FSMA requires that food facilities have safety plans that set forth how they will identify and minimize hazards.

#### *Preventive Control Qualified Individual (PCQI)*

Supplier shall train a PCQI in accordance with the Food Safety Preventive Control Alliance training requirements. Supplier shall have one or more PCQI charged with overseeing and validating that preventive controls are capable of controlling identified hazards and maintaining records for review as is required by the FDA. These programs are to be evaluated both internally by supplier teams and also annually in accordance with GFSI third party assessment standards.

These and other FSMA compliance initiatives will be verified during Weston Foods' supplier audits, including but not limited to kill step or lethality validation, PCQI training certification, ingredient risk assessment, food safety plan, and other preventive control measures.

## SECTION 3 FOREIGN SUPPLIER VERIFICATION PROGRAM (FSVP) REQUIREMENTS

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Importers will be required to perform certain risk-based activities to verify that food imported into the United States has been produced in a manner that provides the same level of public health protection as is required of domestic food processors and produce farms and ensures the products are not adulterated or misbranded with respect to allergen labeling. Requiring importers to take responsibility for the safety of the food they import serves as an additional check on the system. It is the responsibility of FSVP importer to understand the legal/regulatory requirements and to ensure that you adhere to them. FSVP importer acknowledges that Weston Foods shall not conduct FSVP activities for product procured under this agreement and shall rely on the FSVP importer for purpose of compliance with the FSVP Final Rule. Please follow the below link for more information on imports under FSMA and the FSMA Final Rule on Foreign Supplier Verification Programs for Importers of Food for Humans and Animals.

<http://www.fda.gov/Food/GuidanceRegulation/FSMA/ucm361902.htm>

<http://www.fda.gov/Food/GuidanceRegulation/FSMA/ucm257980.htm>

### 3.1 FSVP THIRD-PARTY CERTIFICATION PROGRAM

The FSMA Final Rule establishes a system for the FDA to authorize the accreditation of third-party certification bodies to perform food safety audits and issue certifications for foreign food facilities and the foods they produce. These certifications will be required for participation in the Voluntary Qualified Importer Program (VQIP), which will allow for expedited review and entry of foods from importers in the program. Additionally, to prevent potentially harmful food from reaching U.S. consumers, the FDA can require, in specific circumstances, that a food offered for import be accompanied by a certification from an accredited third-party certification body.

### 3.2 FSVP THIRD PARTY CERTIFICATION

Accredited third-party certification bodies and auditors may conduct food safety audits and issue certifications for foreign facilities producing food for humans. Each third-party auditing body must be certified under new FSMA program and must maintain its certification on file. Supplier must ensure auditor compliance or find another certified auditor in good standing. The cost of certification and accreditation are the responsibility of suppliers and the accreditation bodies. Please see the below link for FSMA fees.

[https://www.federalregister.gov/documents/2016/12/14/2016-30034/food-safety-modernization-act-third-party-certification-program-user-fee-rate-for-fiscal-year-2017?source=govdelivery&utm\\_medium=email&utm\\_source=govdelivery](https://www.federalregister.gov/documents/2016/12/14/2016-30034/food-safety-modernization-act-third-party-certification-program-user-fee-rate-for-fiscal-year-2017?source=govdelivery&utm_medium=email&utm_source=govdelivery)

## SECTION 4 FACILITY AND INGREDIENT CHANGE NOTIFICATION

Supplier agrees to notify Weston Foods of any material changes to its facility or raw materials including but not limited to components, allergens, country of origin, GMO status, and packaging and/or processing methods. No changes may be made by the supplier without the prior written consent of Weston Foods. If changes are made to a supplier's facility, the new or modified facility will be subject to the same third party certification and regulatory requirements as expected of new suppliers.

## SECTION 5 FOOD SAFETY DOCUMENTS

Any and all documents required to be maintained by supplier for all raw materials, packaging, and new facilities after award of business by Weston Foods shall be made available upon request. It is the

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supplier's responsibility to keep their food safety documentation current and to notify Weston Foods promptly of any expirations, cancellations, or changes.

## **SECTION 6 WESTON FOODS TESTING REQUEST**

Weston Foods takes food safety and compliance with food safety Acts and regulations very seriously. As part of Weston Foods Supplier monitoring program and to be in line with FSMA, which requires a supply-chain program as a preventive control, and under Subpart G–Supply-chain Program in the Preventive Controls for Human Food regulation requirements, manufacturing/processing facility must have a risk-based supply chain program for those raw material and other ingredients for which it has identified a hazard requiring a supply-chain applied control.

FSMA's preventive controls final rules require that a facility verify that hazards are being controlled and that corrective action is being taken to prevent contamination. Supplier's decision to conduct regular testing can serve to reflect a risk-based approach consistent with its hazard analysis. Consequently, the FDA expects those facilities that produce foods that have frequently been associated with outbreaks of foodborne illness or pathogen contamination or those that produce RTE foods will establish product testing programs more often than facilities that do not produce such foods. As such, the Department has created a testing program based on the risk of ingredients used in each of our product categories.

Suppliers providing ingredients that have been selected for this program will be required to provide COA and external lab testing to our plants per lot. Description of the ingredients to be tested, the required parameters and Weston Foods internal specifications will be provided in the testing request by the Department.

As part of Weston Foods testing, we request suppliers to initiate annual external lab testing for the verification of parameters determined in the COA for high risk raw materials. Split samples from a specific lot will be sent to supplier selected lab(s) (labs must hold ISO 17025 accreditation) and Weston Foods' selected lab to initiate the testing process. Lab reports must be provided to Weston Foods annually.

It is required that items that are being tested for the presence of pathogens be kept on hold in the supplier facility and not be released or shipped until all test results have been confirmed acceptable. Supplier is to ensure that holding the specific lot does not result in any shortage or supply issues for Weston Foods.

## **SECTION 7 RECALL POLICY**

Suppliers are expected to acknowledge and agree to the conditions of the Weston Foods recall policy and procedure. Please find attached recall notification information for more details and contact information.

## **SECTION 8 TRANSPORTATION REQUIREMENTS**

Food related products, including the contents, packaging, and labeling must be:

- a) suitable for food shipments and in a manner that prevents damage and/or contamination of products;

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- b) placed on pallets and shrink-wrapped in acceptable condition (no splinters or holes) and free of debris;
- c) placed in trailers or other containers that are :
  - a. cleaned on a regular basis and able to provide evidence of such;
  - b. constructed of materials that are suitable for food contact, with clean interior, free from mold and/or noxious or invasive odors;
  - c. sealed and/or locked prior to leaving site of origin, and resealed if multiple stops/deliveries are made, arriving with seal intact at point of destination;
  - d. restricted to food use, or, if carrier is for food and non-food use, non-food items must exclude items that could contaminate products, including but not limited to
    - i. paints and solvents,
    - ii. pesticides and hazardous chemicals,
    - iii. perfumed soaps, detergents, and other similar materials,
    - iv. meat, meat by-products, seafood (that are not in frozen state and not packaged in fully sealed primary and secondary packaging), and
    - v. dirty equipment and construction materials.
  - e. loaded, arranged and unloaded in a manner that prevents damage and contamination of food and packaging materials;
  - f. temperature controlled to the specification noted on the applicable Bill of Lading or shipping documents (temperature monitoring/reefer downloads must be made available to Weston Foods upon request in the event temperature integrity is in question);
  - g. capable of and practicing the segregation of raw materials when contaminants such as allergens are being transported where they could in turn contaminate non-allergen ingredients (records of previous loads must be made available to Weston Foods upon request); and
  - h. well maintained with a documented breakdown procedure in place that includes consideration of
    - i. facility for vehicle drivers to easily contact Weston Foods in the event of a vehicle break down/accident or private carrier assistance,
    - ii. provision of a back-up vehicle or rapid repair facility,
    - iii. evaluations of the products affected by break down and responsibility for doing so, and
    - iv. records that include all details of action taken which must be made available to Weston upon request.

Furthermore, with respect to the delivery of bulk ingredients, the Supplier, carrier or contracted third party carrier shall ensure that:

- a) the driver remain with the vehicle at all times during the unloading process;
- b) the driver abide by any location-specific requirements pertaining to spill prevention communicated by Weston Foods; and
- c) the driver be capable of addressing upsets resulting from the delivery process.

Bulk liquid carriers are encouraged to carry their own spill response materials and to train their drivers in the carrier's spill response requirements.

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Should you have any questions or concerns with respect to this schedule please contact me.

**WF BAKERY INC.**

Carla Marett  
Corporate Director of Quality – North American  
Corporate Food Safety Supplier Program Manager

1425 The Queensway, Etobicoke, ON. M8Z 1T3

Email: [carla.marett@westonfoods.com](mailto:carla.marett@westonfoods.com)

Office: (647) 502-3798

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## WESTON FOODS SUPPLIER RECALL PROGRAM

A primary business goal of Weston Foods (Canada) Inc. and its subsidiaries (“Weston Foods”) is to provide safe, high quality, and consistent products to our customers and consumers.

This Weston Foods Recall Program requires all suppliers, including brokers, to immediately notify a member of our Supplier Program Recall Team of any product recall or withdrawal.

COMPLIANCE WITH THE WESTON FOODS SUPPLIER RECALL PROGRAM IS IN ADDITION TO AND DOES NOT SUPERSEDE ANY RIGHTS OR OBLIGATIONS ESTABLISHED IN THE PURCHASE ORDER TERMS AND CONDITIONS OR IN ANY AGREEMENT WESTON FOODS MAY HAVE WITH OUR SUPPLIERS.

Weston Foods’ suppliers are required to contact us directly to eliminate delays and ensure the communication of issues to the appropriate recipients.

Weston Foods Supplier Recall Team				
	Name	Office phone number	Cellular number	Email
Primary	Carla Maret (Corporate Director of Quality – North America)	(647) 502-2798	(647) 502-3798	Carla.Maret@WestonFoods.com
Alternate	Kate Honeyborne (Corporate Manager, Supplier & Internal Audit)	(416) 252-7323 Ext 2602	(519) 217-7107	Kate.Honeyborne@WestonFoods.com
Alternate	Sagar Jadhav (Supplier Auditor, SHEQ – Food Safety)	(416) 252-7323 Ext 2659	(647) 609-6160	Sagar.Jadhav@WestonFoods.com
Alternate	Anna Koo (Supplier Auditor, SHEQ – Food Safety)	(416) 252-7323 Ext 2227	(647) 216-8465	Anna.Koo@WestonFoods.com

### Reporting a recall or withdrawal:

Timeline, accuracy and comprehensive details will allow us to work with our suppliers to ensure the containment and removal of potentially harmful products/ingredients found in our plants. The following information is required when reporting a recall or withdrawal to Weston Foods:

Product(s) and description	Common name and description of product
Size and pack	Bulk, bag and pack size, etc.
Codes involved	Identify product codes, location of codes and explanation
Lot codes, shipping date and PO numbers	Lot codes (Date of manufacture and/or expiry date and package code date), shipping date and PO numbers.
Distribution	Weston Foods divisions and plants. Full details required

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	including tracking information
Reason of withdrawal/ recall	Full details required
CFIA/ FDA	Has the CFIA/ FDA been notified?
Supplier Food Safety/ QA/ Technical Contact information	Please provide phone number, title and email of the person responsible for recall/ withdrawal process
Supplier Business representative contact information	Please provide phone number, title and email of the person responsible for recall/ withdrawal process

If you have any questions, please feel free to contact any of the Weston Foods Supplier Program Recall Team members.

Regards,

**WF BAKERY INC.**

Carla Marett  
Corporate Director of Quality – North America  
Corporate Food Safety Supplier Program Manager

1425 The Queensway, Etobicoke, ON. M8Z 1T3  
Email: [carla.marett@westonfoods.com](mailto:carla.marett@westonfoods.com)  
Office: (647) 502-3798