Vita-Pakt®
CITRUS PRODUCTS CO.

May 24, 2022

Subject: **Technical & Quality Documentation Request Policy**

Dear Valued Customers,

As you are aware, the ongoing demands for technical and quality documentation have increased tremendously over the last few years within the industry. As a small privately held company, Vita-Pakt Citrus Products Company has increased its staff to better serve and respond accordingly to the requirements, which has been quite successful, however it has reached an overwhelming limit. Therefore, we have established a new policy for documentation requests.

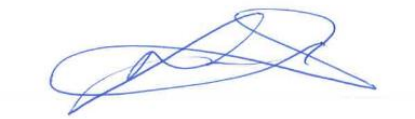
In response to customer inquiries, we are providing our Technical Bulletin Packet by product and a separate Technical & Quality Documentation packet to address general questions pertinent to all products produced.

Documentation is also available online, through a third-party management portal:
https://www.tracegains.com

As a reminder, our manufacturing locations in Lindsay and Fresno have successfully achieved certification with the BRC (British Retail Consortium) Global Standard for Food Safety, which is a *GFSI-recognized certification program* (Global Food Safety Initiative as established by the Consumer Goods Forum). The BRC certificates and full audit reports are available at request.

We appreciate your understanding and ask that you contact our Customer Service or Sales Department, if you have any questions or require additional information.

Regards,



Douglas Lovejoy
Director of QA and Food Safety
Vita-Pakt Citrus Products Co.

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**TECHNICAL & QUALITY DOCUMENTATION**

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# ALLERGEN CONTROL POLICY

Vita-Pakt's manufacturing facilities do not have the so-called "**Big Nine**" allergens (peanuts, tree nuts, milk, eggs, soy, sesame, fish, shellfish & wheat) that are responsible for over 90% of all severe food allergic reactions and the focus for control and regulatory action.

Since our finished products are exported as well to Canada, Canadian Allergens (eggs, milk, mustard, peanuts, seafood, sesame, soy, sulphites, tree nuts, & wheat) are also taken into consideration. The Lindsay facility does not carry any of the Canadian allergens; however, the Fresno facility processes product-containing sulfites (a U.S. sensitivity agent and Canadian allergen).

As a preventive measure, in case and when allergens or sensitivity agents are introduced, established procedures are in place in order to manage and minimize a potential cross-contaminate risk of all known or identified food borne allergens or other agents. This plan connotes as a preemptive step in order to address any potential risk and includes but is not limited to:

1. **Ingredient Control**: All ingredients listed as allergenic or sensitive agents (to the best of knowledge) are isolated and stored away from all other food ingredients and packaging materials.
2. **Scheduling**: Allergen or sensitivity agents containing products are run at the end of the production sequence.
3. **Rework**: Rework containing unique allergens or sensitivity agents are used only in the same formulation. All rework material is controlled with proper labeling and documentation and comply within the rework system program.
4. **Cleaning**: Sanitation activities are scheduled immediately following the production of allergenic or sensitivity causing agents to help reduce the risk of allergenic or sensitive agent residue from being transferred to new products. All equipment is thoroughly cleaned at the end of each run using prescribed sSOP's which include but are not limited to cleaning chemicals and hot water.
5. **Packaging & Labeling**: The information on the label accurately identifies allergens or sensitivity agents present in the product. The accuracy of the labels are confirmed against the product's declared ingredients and the formulation.
6. **Training**: Training the basics of allergens are covered to ensure that key employees understand the real health consequence that can result when SOP's are not followed or products are not properly labeled.

The need for effective allergen control is an ongoing concern. However, we believe that Vita-Pakt's comprehensive allergen prevention plan would enable us to successfully control any potential allergen contamination risk.

Please refer to the product Technical Bulletin packet regarding Allergen/Sensitivity Agent specific declaration.

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## GENETICALLY MODIFIED ORGANISMS (GMO)

This letter is in response to requests for information on genetically modified organisms as related to products manufactured at Vita-Pakt.

Please be advised that the products manufactured at Vita-Pakt are made from fruit or vegetables that have not been genetically engineered nor have ingredients added that have been genetically modified. Currently, there are no genetically engineered (GE) versions of the crop available for commercial use. In addition, there are no genetically engineered enzymes or microorganisms used in the manufacturing process. This is with exception to specific products manufactured at our Lindsay, CA facility containing the ingredient, high fructose corn syrup (HFCS), as listed in the product ingredient statement and included on the product label.

> *"Although HFCS is derived through the processing of genetically engineered varieties of corn, the corn DNA is denatured, degraded, or removed through successive processing steps. Both literature and current testing indicate that corn DNA cannot be detected in measurable amounts in HFCS." (Corn Refiners Association, Inc.)*

Regardless, Cross contamination prevention procedures are in place to minimize the risk of potential cross contact with GE or GMO materials.

Vita-Pakt supports regulations and policies of the U.S. Food and Drug Administration, U.S. Department of Agriculture and U.S. Environmental Protection Agency, as well as we are in compliance with EU regulation 1829/2003 and 1830/2003.

## BIOENGINEERED FOOD STATEMENT

The Final Rule for the National Bioengineered Food Disclosure Standard (NBFDS) requires that foods of or manufactured with the following list are to be disclosed on the label:

Alfalfa
Apple (Artic™ varieties)
Canola
Corn
Eggplant (BARI Bt Begun varieties)
Papaya (ringspot virus-resistant varieties)
Pineapple (pink flesh)
Potato
Salmon (AquAdvantage®)
Soybean
Squash (summer)
Sugarbeet

We at Vita-Pakt Citrus Products Company hereby confirm we do not manufacture any of our branded products using ingredients sourced from any of the above listed bioengineered ingredients.

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## CERTIFICATE OF NATURALNESS

We certify pursuant Section 101.22 (a) (3) of Title 21 of the Code of Federal Regulations, that Vita-Pakt Citrus Products Orange, Lemon, Tangerine, Lime, and Grapefruit products, including but not limited to bases (ingredients of the fruit), cells, concentrates, juices, oils, peel, pulp, purees (ingredients of the fruit) and whole ground fruit, are only derived from fresh fruit and thus designated as natural.

They contain no chemical preservatives (with exception to sulfited products as declared on the ingredient statement and product labels), artificial flavors, added colors (natural or artificial including Carbon Black), synthetically produced ingredients or natural ingredients that are so highly processed that they would be considered synthetic. This would include added agents of processing considered unnatural such as synthetic volatile solvents, irradiation, or sewage sludge used in the production or handling of this product.

## FOOD GRADE STATEMENT

We are pleased to inform you that all the ingredients in the products we provide our customers are food grade and suitable for human consumption and if applicable, conform to the current specification listed in the Food Chemical Codex and is safe for its intended use in foods for human consumption.

In addition, packaging pails and liners are food grade and meet the requirements of the FDA for direct contact with food products and all components comply with 21 CFR for food packaging.

## GRAS STATEMENT

To the best of our knowledge and the published information from the FDA websites and other sources, Oranges, Lemons, Limes, and Grapefruit are recognized as GRAS (FDA GRAS Status List; 21CFR 182.20, updated April 1, 2007). “GRAS” is an acronym for the phrase Generally Recognized As Safe. Under sections 201(s) and 409 of the Federal Food, Drug, and Cosmetic Act, any substance that is intentionally added to food is a food additive, that is subject to premarket review and approval by FDA, unless the substance is generally recognized, among qualified experts, as having been adequately shown to be safe under the conditions of its intended use, or unless the use of the substance is otherwise excluded from the definition of a food additive. While it is impracticable to list all ingredients whose use is generally recognized as safe, FDA published a partial list of food ingredients whose use is generally recognized as safe to aid the industry’s understanding of what did not require approval, orange, lemons, limes, and grapefruit as being such.

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## CONTINUING PRODUCT GUARANTEE

This hereby certifies that each shipment or other delivery of our product are guaranteed to be not adulterated or misbranded within the meaning of the Federal Food, Drug, and Cosmetic Act or any amendment thereunto including the Food Additives Amendment of 1958 or any substantially similar state or municipal law. Furthermore, each shipment or delivery is not an article, which under the provision of Sections 404 and 505 of the Act are prevented from being introduced into interstate commerce.

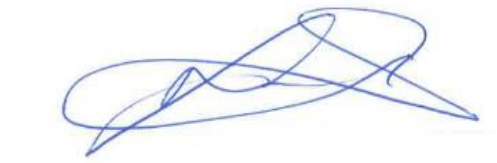
Vita-Pakt manufactures and labels in accordance with FDA regulations and will neither knowingly nor intentionally expose (as defined in the Compliance with Safe Drinking Water and Toxic Enforcement Act of 1986) any individual to a chemical known to cause cancer or reproductive toxicity as defined under California Proposition 65. Our products do not require a warning label.

We also guarantee to supply products consistently produced at the highest standard through the use of a robust HACCP and documented GMP programs, which includes recall, pest control and sanitation programs.

We are compliant with the Public Health Security and Bioterrorism Preparedness and Response Act of 2002, are registered with the FDA as required under 21 CFR l.225 through 1.243, and have secured letters from each of our vendors to ensure that they are also registered.

Vita-Pakt Citrus Products Co., Inc. is compliant in the United States Food and Drug Administration's (FDA) Food Safety Modernization Act (FSMA), signed into law on Jan. 4, 2011. This includes the elements of food safety including shipping and handling, prevention, inspection, compliance, response, prerequisites, hazard risk analysis, importation compliance and Biennial Registration. Our staff training include those certified as PCQI's, which include elements of HARPC, HACCP and internal auditing.

This guarantee shall be a continuing guarantee and shall be in effect until revoked in writing.



Director of QA and Food Safety
February 18, 2022

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# LOT CODE SYSTEM

**Finished products are assigned a lot number consisting of either four or five digits. 5-digit lot numbers are only assigned to products manufactured having multiple batches.**

**4-digit Lot Number**: the first 3-digits represent the Julian date. The fourth digit represents the last digit of the year.

Example: December 31, 2019 is the 365th day of 2019.
The Lot No. would be "3659".

**5-digit Lot Number:** In the event of multiple batches, a fifth digit is added to the Julian Code.

Example: December 31, 2019 is the 365th day of 2019
The first batch on December 31, 2019 is coded "36591."
The second batch would be "36592."

The LOT NO is located on the bottom, right corner of each product label (above the manufactured date).

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## COMPLIANCE WITH THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (CALIFORNIA PROPOSITION 65)

Vita-Pakt is fully committed to comply with the statutory requirements under California's Proposition 65, a voter initiative enforced by law. It requires a warning on products (usually on the label) if a significant risk of cancer or reproductive harm would result from exposure to a state-listed substance in the product. This would include the use of an ingredient or additive that is not naturally present, at a level to induce such harm.

Our Technical Department has completed an analysis of the regulations and we have reviewed all available data on the ingredients and the products we use and manufacture at our facility. At this time, based on the best available information, our products do not require a warning label under the current regulations.

Vita-Pakt maintains an aggressive quality program that complies with current good manufacturing practices. Based on this commitment to our customers, we will neither knowingly nor intentionally expose (as defined in the Act) any individual to a chemical known to cause cancer or is a reproductive toxicity.

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# FDA FACILITY REQUIREMENTS

## Mandatory Facility Registration with U.S. FDA

In response to FDA's *"Public Health Security and Bioterrorism Preparedness and Response Act of 2002;"* Vita-Pakt Citrus Products Company has successfully completed the registration process of its manufacturing and/or warehousing facilities with FDA.

| Facility | Address |
|---|---|
| Lindsay, California | 525 E. Lindmore St.<br>Lindsay, CA 93247<br>Phone: (559) 562-6008<br>Fax: (559) 562-1014 |
| Fresno, California | 5455 South Villa<br>Fresno, CA 93725<br>Phone: (559) 834-6885<br>Fax: (559) 834-6888 |
| Del Rey, California | 8898 E. Central<br>Del Rey, CA. 93616<br>Phone: (559) 233-4452<br>Fax: (559) 233-5436 |

Therefore, we are in compliance with FDA's registration requirements and remain fully committed to the "Public Health Security and Bioterrorism Preparedness and Response Act of 2002."

## FDA Reportable Food Registry Compliance Statement

On September 27, 2007 the President signed into law the Food and Drug Administration Amendments Act of 2007. A new section was added that requires the Secretary of Health and Human Services to establish within the FDA, a Reportable Food Registry as a means of providing a reliable mechanism to track patterns of adulteration in food. This act became legally enforceable as of 2009.

A reportable food refers to any food or food product in which consumption of or exposure to will cause serious adverse health consequences or death to humans or animals. According to this new act, the manufacturer responsible must report the problem no later than 24 hours after determining the food is reportable.

The responsible party is *not* required to submit a report if the following apply: (1) the adulteration originated with the responsible party; (2) the adulteration was detected prior to any transfer to another person of such article of food, *and* (3) the adulteration was corrected or destroyed.

In the event we suspect and/or determine that we have a reportable food incident, we will immediately advise our customers involved. Please find attached emergency contacts for the appropriate person and/or division contacts.

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# RECALL ORGANIZATION
# AND
# EMERGENCY CONTACT LIST

| Contact Person | Title | Business hours phone number | After hours phone number | Email |
|---|---|---|---|---|
| Sergio Lobo | VP of Operations | (559) 562-6008 Ext. 238 | (661) 378-6546 | slobo@vita-pakt.com |
| Tanner Roberts | Director of Operations | (559) 562-6008 Ext. 252 | (559) 832-1631 | troberts@vita-pakt.com |
| Paul Gottschall | Sr. Advisor of Product Innovation | (559) 562-6008 Ext. 213 | (559) 285-4762 | pgottschall@vita-pakt.com |
| Rudy Garza | Sr. QA/QC Employee Safety Manager | (559) 562-6008 Ext. 215 | (559) 840-5776 | rgarza@vita-pakt.com |
| Doug Lovejoy | Director of QA and Food Safety | (888) 684-8272 Ext. 258 | (559) 999-0122 | dlovejoy@vita-pakt.com |
| Gilbert Menchaca | Warehouse Manager | (559) 562-6008 Ext. 220 | (559) 331-2132 | gmenchaca@vita-pakt.com |
| Rebecca Scott | Regulatory Compliance & Food Safety Manager | (559)562-6008 Ext.270 | (661)335-2318 | rscott@vita-pakt.com |

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## PESTICIDE STATEMENT

The pesticide compliance program at Vita-Pakt is multi-faceted program and includes the following elements:

1. Once a year, randomly selected ingredients/finished product samples are forwarded to a third party lab such as Primus Labs in Santa Maria, CA for Multi Residue Screening (MRS). MRS for Pesticides includes the following compounds:
   Group A - Organohalides (103 compounds)
   Group B - Organophosphates (70 compounds)
   Group C - Methyl Carbamates (13 compounds)
   Group D - Organonitrogens (76 compounds)
   Group E - Lower-risk insecticides and other compounds (24 compounds)
   Group F - Benzimidazole compounds (3 compounds)
   Group G - Fenbutatin Oxide (Vendex)

2. As part of our Supplier Certification program we require from our major suppliers to provide us with certificate of pesticide residue analysis on an annual basis. Test results are reviewed and filed.

3. The California Department of Food and Agriculture (CDFA) division of Inspection Services, the Pesticide Enforcement Branch administers the Department's Licensing and Certification Program to ensure agriculture commodities and processed foods meet tolerances for maximum allowable pesticide residues.

4. Additionally, CDFA monitors pesticide residues in agricultural commodities and processed foods through extensive sampling and testing on an annual basis to ensure growers are in compliance with pesticide tolerances established by EPA and the State of California Department of Pesticide Regulations (CDPR).

5. Finally, Vita-Pakt supports regulations and policies of the U.S. Food and Drug Administration, U.S. Department of Agriculture, U.S. Environmental Protection Agency and California Department of Food and Agriculture and Department of Pesticide Regulation (CDFA and CDPR).

Based on this comprehensive program we hereby certify that products manufactured at Vita-Pakt comply with the pesticide tolerances established by the EPA and the State of California.

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## VITA-PAKT CGMP POLICY AND OBJECTIVES

This policy is in place and in enforcement since company Quality Program inception.

### A. CGMP POLICY:

Vita-Pakt Citrus Products Company shall be in compliance with the Food, Drug and Cosmetic Act of 1938 and its defined GMP elements to include those regulations as promulgated:

Our facilities are compliant with regulations that are directly related to conditions of a facility where food has been manufactured (Section 402 (a)(3) and (a)(4)of the Act).

- Furthermore with the regulations as contained in the "Current Good Manufacturing Practices" 21CFR, Part 117.

Our personnel comply with *"All persons working in direct contact with food, food contact surfaces, and food packaging must conform to hygienic practices while on duty to the extent necessary to protect against allergen cross-contact and against contamination of food."* (FDA-cGMP's Part 117.10 (b))

### B. CGMP OBJECTIVES:

To produce safe and wholesome food through well-controlled operations.
To comply with federal, state and local regulations.
To comply with Vita-Pakt Citrus Products Company policy on cGMP's in excess of regulations.

### C. CGMP ASSURANCE OF COMPLIANCE

**General Provisions include:**

- Staff training and certifications to include PCQI, Internal Auditing, etc.
- Daily inspections and checks by Supervision
- Monitoring sSOP's and update or design as needed.
- Review and monitor Sanitary Designs, Plant and equipment Upgrades.
- HARPC elements including but not limited to Risk Analysis and Assessments.
- PM's and Equipment Return to Work Program Compliance.
- Records and Documentation Management including Monitoring, Control and Generation as needed.
- Approved Supplier Vendor Program
    - Independent Internal Auditing Program

## CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT STATEMENT

Vita-Pakt Citrus Products Company Statement of Compliance with California Transparency in Supply Chains Act (SB 657 – Chapter 556)

The California Transparency in Supply Chains Act of 2010, Civil Code Section 1714.43, also known as Senate Bill 657 (SB 657) ("Act") became effective January 1 2012 in the State of California. The Act requires that manufacturing companies, among others, doing business in California for tangible goods offered for sale, to disclose their efforts to eliminate slavery and human trafficking from their direct supply chains.

We at Vita-Pakt Citrus Products fully support California's efforts to protect human rights and enforce ethical labor practices. Vita-Pakt has adopted and maintained a Supplier Vendor Approval Program, which includes a Code of Conduct, which requires that our direct suppliers ensure they do not engage in or support forced labor or unlawful child labor as per the regulation requirements. Additionally our suppliers must be in full compliance and maintain the terms of employment for their employees that comply with regional and local law and work within the ethical boundaries and requirements of human respect and decency.

Currently we are engaged with third party audits for Sustainability Elements, which does include many of those within the Supply Chains Act, and requires us not to do business with vendors or suppliers that engage in human rights violations, including but not limited to the use of child labor, forced labor, slavery or discrimination.

## SUSTAINABILITY STATEMENT

Since 1957, Vita-Pakt Citrus Products has been dedicated to conducting our business with care and integrity as stewards for our communities, respecting and protecting our environment.

Vita-Pakt supports our customers and vendors' sustainability initiatives, and encourages programs such as: Waste Reduction by reviewing operations such as packaging options to reduce waste. Offering ecologically preferable product choices such as Organic, Natural, Chem-Free and others.

Increased environmental awareness is core to our business practice at Vita-Pakt. Wherever possible, we seek to integrate sustainability practices into our company's operations such as: Engineering, designing, manufacturing and producing environmentally friendly products and necessary food processing equipment to facilitate the production of our food products.

Each employee, from entry level to top executive, is considered our most valuable resource. By using continuing improvement programs to increase employee safety, food safety, sustainability awareness and compliance to corporate and government policies, rules and regulations, we can contribute and ensure the health and safety of our customers as well as all of our employees.

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## Juice HACCP/FSMA Compliance Statement

In accordance with the regulations promulgated under the U.S. Federal Food, Drug and Cosmetic Act and the U.S. Code of Federal Regulations Title 21 Part 120, we declare and certify by the following statement our commitment of compliance:

Vita-Pakt hereby certifies that all citrus juices sold and delivered into commerce by Vita-Pakt comply with the Hazard Analysis and Critical Control Point (HACCP) requirements as stipulated in 21 CFR 120 (Juice HACCP).

In addition, Vita-Pakt Citrus Products Co., Inc. is compliant with the United States Food and Drug Administration's (FDA) Food Safety Modernization Act (FSMA), signed into law on Jan. 4, 2011. A food safety plan for non-beverage citrus products, which includes requirements for Current Good Manufacturing Practice (CGMPs), hazard analysis and risk- based preventive controls for human food (PCHF), has been established and implemented to ensure compliance under 21 CFR 117.

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## DIETARY

### Gluten-Free Statement

The Food & Drug Administration issued a proposed rule (published in the Federal Register, 72 FR 2795, January 23, 2007) defining the term “Gluten” and established a standard for when a “Gluten-Free” claim may be made on food labels. This was promulgated as part of the Gluten-Free Food Labeling Final Rule, August 2, 2013 and is effective 30 days after publication on September 1, 2013, with full compliance one year later on August 2, 2014.

Use of the labeling claim “Gluten- Free” or similar claims (e.g.: “free of gluten”, “without gluten”, “no gluten”) means that the food bearing the claim does **not** contain any one of the following:

(i) An ingredient that is a prohibited grain (wheat, rye, barley) or is a crossbred hybrid of a prohibited grain (e.g. durum wheat, spelt wheat, einkorn wheat, emmer wheat, kamut, and triticale);
(ii) An ingredient that is derived from a prohibited grain and that has not been processed to remove gluten;
(iii) An ingredient that is derived from a prohibited grain and that has been processed to remove gluten, if the use of that ingredient results in the presence of 20 parts per million (ppm) or more gluten in the food;
(iv) 20 ppm or more gluten.

We at Vita-Pakt Citrus Products Company hereby confirm that the product and its ingredient supplied to you do not contain gluten, or any ingredients derived from gluten, and that these products and ingredient meets the above cited requirements. In addition, all reasonable care has been taken to prevent any type of cross contamination within our production facilities.