



True Terpenes

TRUE GRADE™ Compliance Packet





Dear Valued Customer,

We hope you will find peace of mind as you explore the following documentation of our True Grade™ system. We are proud to be the first and **only** third-party certified GMP, ISO, and FSSC company for the manufacture of terpene blends. We go the extra mile (or two) so that you can rest easy. This is our promise to you.

About Us

We are a wholesale distribution company operating out of beautiful Portland, OR. We manufacture, package, and distribute undiluted terpenes, flavor ingredients, and blends. Our True Terpenes family is comprised of more than 50 employees of which about half work directly in manufacturing and distribution at our Hayden Island facility. All employees are properly trained in Good Manufacturing Practices (GMP), Food Safety, and Food Defense.

Our Mission

We are committed to providing high-quality, safe, and secure products to customers like you throughout the world. Every day we seek to take an active leadership role in this new and emerging industry.

Our Products

Our current product offerings are: Terpene Isolates, Precision Strain Profiles, Flavor-Infused Strain Profiles, TERP Flavors, and Viscosity. Each of these products come in a variety of sizes ranging from 2mL to a gallon. All products are formulated, blended, packed, and labeled in cGMP facilities conforming to FSSC 22000 and ISO 9001:2015 quality standards. All products are tested in an ISO/IEC 17025 accredited laboratory according to our Master Product Specifications. Certificate of Analysis (COA) and Safety Data Sheets (SDS) are available for each product on our website **TrueTerpenes.com**. Other valuable documentation such as Certificates of Compliance (COC), Natural Certificates, Food Grade Statements, etc. are available upon request. The traceability of each product from bulk material to customer is ensured.

You are welcome to reach out if you'd like to schedule a site visit and see it all for yourself. Our excellent Customer Service team is available to answer any questions you might have.

We greatly appreciate your business and look forward to serving you for years to come.

True Terpenes





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Self-Audit Form **Section 1: General Information**

Company Name	Bulk Natural LLC. DBA True Terpenes
Products / Services	Design and Manufacturing of Terpenes, Flavor Ingredients, and Isolates
Address	2416 N. Hayden Island Dr. Portland, OR 97217
Phone Number	(888) 954-8550
Email	info@trueterpenes.com
Is the company a division or subsidiary of another corporation?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Number of Years in Business	< 4 years
Number of Personnel	~50 Employees
What is the square footage of the facility?	3,450 sq ft.
Number of Personnel in Production	~10
How Many Shifts?	Single 8-hr shift
QA Contact	Name, Title: Alesya Bradley, Quality & Regulatory Manager
Number of Personnel in QA? In QC?	QA- 2; QC - 2;
Is the QA department independent of production?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No



Self-Audit Form **Section 3: Quality Systems**

	Yes	No	N/A	Comments
Do you operate under a Quality Management System Manual (QMSM)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A Table of Contents is attached.
Is there a company organizational chart?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Available upon request.
Is there a published quality policy stating the company's intentions to meet its obligations to produce safe and legal products, and its responsibilities to customers?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A copy is attached.
Is the policy communicated to all staff and understood?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Are responsibilities clearly defined and appropriate arrangements in place to cover for absence of key staff?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Are quality objectives established and maintained?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is there a system in place to keep the company informed of all relevant legislation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Do you have a customer complaint handling procedure?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is there an effective management review with agreed actions communicated to appropriate staff?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is there a documented internal quality audit program?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Are there internal audits carried out at a frequency determined by risk?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Are there documented operating procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is there a document and change control system in place?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Are documents maintained for a minimum of 3 years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is there a documented system of calibration of measuring equipment, including corrective actions for out of specification equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is there a documented supplier control program in place with written SOPs (Standard Operating Procedure)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is there a documented supplier approval process based on risk assessment that covers all ingredients and packaging materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Do you audit your suppliers?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Annually



Self-Audit Form **Section 3: Quality Systems (cont.)**

	Yes	No	N/A	Comments
Are incoming materials staged and properly identified with status (ie. acceptable, hold, rejected, etc.)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Incoming Raw Materials are placed on "HOLD" and kept separate from "RELEASED" Raw Materials and Finished Goods.
Are incoming inspection processes documented? What sampling plan is used for incoming inspection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Every delivery and all materials are inspected and the inspections are documented in Receiving records.
Are incoming raw materials inspected and tested against agreed specifications?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Every bulk lot is inspected and safety tested according to our Master Product Specifications (Attached). We do not accept ANY incoming raw materials if they do not meet these specifications.
Are raw materials positively released?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Can traceability, that includes rework, be demonstrated back to suppliers and forward to customers?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Are there 'In process' quality control procedures and records maintained?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Quality Control Records maintained for 5 years.
Are there operating procedures to control non-conforming material (Out of Specification) and ensure CAPA (Corrective Action Preventive Action) are recorded and assigned?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is a quarantine area in place for non-conforming material?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Quarantine area locked up and properly segregated.
Are there documented finished product specifications?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	



Self-Audit Form **Section 3: Quality Systems (cont.)**

	Yes	No	N/A	Comments
Are finished products positively released?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is an inventory management turnover method being used, such as FIFO (First In First Out)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	FIFO is used.
Are finished products tested and approved before release?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Do you have a dedicated area for retained samples?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Retained samples are kept in a temperature-controlled environment and are retained for up to 1 year.
Does the company operate a formal system of training, including new hire training with records maintained and reviewed periodically?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Job-specific, GMP, Food Safety / Food Defense Training for all new hires. Training refreshes annually.
Is there a documented recall plan in place?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is this challenged on a regular basis (ie. mock recall?)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mock Recalls are performed twice a year (every 6 months).
Is there a procedure for notifying customers in the event of a recall?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is there a change control SOP in place?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is the customer notified of any changes in the finished product specifications or relevant process controls?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	



Self-Audit Form **Section 4: Facilities and Equipment**

	Yes	No	N/A	Comments
Are site boundaries clearly defined?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is the condition of the buildings and surroundings basically sound?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is the site secure with access to production and storage areas restricted to authorized personnel?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Are the equipment/utilities clearly identified?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is the process flow designed to minimize the risk of cross-contact and cross-contamination?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Are walls, floors, and ceilings designed, constructed, finished, and maintained to prevent accumulation of dirt and facilitate cleaning?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Facility is maintained to GMP Standards.
Is adequate ventilation/extraction provided to prevent condensation or excessive dust?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is all water used in production or cleaning free from risks of contamination?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Water is not used in production, only in cleaning of the facilities and glassware.
Is the water supply treated (internally or at the source)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is the quality of water, steam, ice, air, compressed air, or gas regularly monitored?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Water is tested for potability annually.
Is the accumulation of waste prevented?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Are waste containers covered and at least 5 meters from an entrance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is all equipment constructed from food grade material?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is there a planned preventative maintenance program in place?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is all equipment validated?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Do the records indicate that the measuring/testing equipment is regularly calibrated? Is the calibration recall system acceptable and N.I.S.T. traceable?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	





Self-Audit Form **Section 5: Food Safety / HACCP**

	Yes	No	N/A	Comments
Is there a Food Safety Plan(FSP)/HACCP (Hazard Analysis Critical Control Points) plan written and maintained by a certified PCQI (Preventive Control Qualified Individual)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Copy of Table of Contents, Flow chart, and Food Safety Statement attached.
Is the FSP/HACCP updated at least annually?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Does the facility comply with the Food Safety Modernization Act (FSMA)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Do you have a safety team that regularly updates a Hazard Analysis that identifies all hazards associated with your facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Are all the hazards that have been identified in your hazard analysis controlled by your facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is there a multidisciplinary Food Safety Team that meets on a regular basis?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Food Safety Meetings documented monthly.
Are Food Safety/HACCP meetings documented and records maintained?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Are key personnel trained in Food Safety and Food Defense?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All personnel trained in FDA 101 and supervisors/ managers trained in FDA ALERT training.



Self-Audit Form **Section 6: Sanitation and Hygiene**

	Yes	No	N/A	Comments
Is there a documented sanitation control program in place with written SOPs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Are documented cleaning schedules in place and records maintained?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is cleaning/sanitation outsourced?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cleaning of the facilities is performed two times per week during non-production hours.
Is the effectiveness of cleaning schedules verified and audited?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Weekly swabbing and quarterly environmental testing performed and documented.
Does the facility utilize hygienic zoning?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Are chemicals segregated from other ingredients, correctly labelled, and stored?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Chemicals stored away from Raw Materials and Finished Goods.
Are hygiene rules agreed and communicated with all staff?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Documented Hygiene Policy Attached.
Is smoking permitted in designated areas only?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Smoking is not allowed on the premises.
Is eating and drinking permitted in designated areas only?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Eating and Drinking only allowed in break rooms.
Are personnel, including visitors, with contagious diseases/boils/septic cuts/sores excluded from production areas?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Sick workers are not allowed into production.
Are coverings to minor injuries brightly colored and/or metal detectable?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Brightly Colored
Are all production personnel required to wear hair/beard nets for product protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is all external clothing (ie. overalls, lab coats, etc.) laundered externally?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is there a policy restricting the wearing of jewelry, fake eyelashes, fingernails, etc.?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	





Self-Audit Form **Section 6: Sanitation and Hygiene (cont.)**

	Yes	No	N/A	Comments
Are there adequate handwashing facilities provided?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Are handwashing signs visible and legible?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Are there adequate changing and toilet facilities separated from food processing and handling areas?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Are personal items and lockers outside of the production area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is hand cleaner bacteriostatic, unperfumed, and liquid?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is hand drying by hot air and/or paper towel?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Are waste containers available and lidded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Self-Audit Form **Section 7: Pest Control**

	Yes	No	N/A	Comments
Is pest control carried out by a third-party contractor?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Sprague
Is the service contract defined?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is pest control carried out by trained personnel?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is there a site map indicating the position of all pest control measures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Are records maintained and actions undertaken and signed off as required?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Are there adequate electric fly killers and moth traps in use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Are windows and doors to production areas adequately screened to prevent ingress of pests?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Are goods stored in such a way as to allow inspection and minimize the risk of infestation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	





Self-Audit Form **Section 8: Cross Contamination**

	Yes	No	N/A	Comments
Is product, including rework, metal detected?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Do you use screens, magnets, or filters in your process?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Filters on occasion.
Is all glass and brittle plastic identified and a register maintained?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is there a written procedure for glass/hard plastic breakages and are all breakages recorded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Are all bulbs and strip lights, including those on electric fly killing units, protected from shattering?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Has the use of wood been eliminated from production areas?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Are raw materials and finished products stored in clean, dry, and well-ventilated spaces, protected from dust, cross-contact, and sources of contamination?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is there a documented allergen control program in place with written SOPs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Allergen Statement Attached.

Self-Audit Form **Section 9: Packaging and Supply**

	Yes	No	N/A	Comments
Are there procedures to ensure that the products are adequately protected after manufacture and during transit to our facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Does all packaging comply with relevant food safety legislation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is packaging stored away from raw materials and finished product?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is the product supplied on protective layer pallets?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is traceability of packaging ensured?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is the packaging tamper evident?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	



Self-Audit Form **Section 10: Laboratories and Testing**

	Yes	No	N/A	Comments
Do you have an internal laboratory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Is an outside laboratory used for any testing?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Safety Testing (Pesticides, Residual Solvents, Heavy Metals); Purity Testing for Isolates
Are outside laboratories certified (ie. ISO 17025)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In case of calculation, is the calculation checked by another person? (In case of the use of software validation, the calculation sheet must be validated)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is skip lot testing done on any tests listed on the product specification?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Every lot is tested.

Self-Audit Form **Section 11: Item / Material Specifications (If Applicable)**

**Product Specification sheets for the items / materials below are available upon request.

Item / Material	Terpenes and Terpene Blends
Lot Code Example	19091625
Lot Code Interpretation	YY=Year; MM=Month; DD=Day; ##=Batch Number
Size	2mL, 5mL, 15mL, 1oz, 4oz, 16oz, 1gal

The following documentation is provided on the website: Bulk Lot COA and SDS

The following documentation is provided by QA upon request: Product Specifications, Bottle Lot COA (or written traceability to Bulk Lot), Certificate of Compliance, Natural and other applicable product certificates.



Certificate of Registration

The Food Safety Management System of:

Bulk Natural LLC, DBA True Terpenes

at

***2416 North Hayden Island Drive, Portland, Oregon 91217, USA
4080 SE International Way, Portland, Oregon, 97222, USA***

has been assessed and determined to comply with the requirements of

**Food Safety System Certification (FSSC) 22000
(Version 4.1)**

Certification scheme for food safety management systems consisting of the following elements:
ISO 22000:2005, ISO/TS 22002-1:2009 and additional FSSC 22000 requirements version 4.1.

This certificate is applicable for the scope of:

Manufacturing of terpenes, flavor ingredients and isolates for the food industry.

Food Chain Category: K - Production of (Bio) Chemicals

Certificate of Registration No: 5958

Date of Certification Decision: September 6, 2019

Initial Certification Date: September 6, 2019

Issue Date: September 6, 2019

Valid Until: September 6, 2022



Authorized By: Kelly Abbott

Director of Certification

Issued by:

EAGLE Food Registrations Inc. | 40 N. Main Street, Suite 1880 | Dayton, OH 45423 | USA
937.293.2000 or 800.795.3641 | www.eaglecertificationgroup.com

V1 - 12/11/2017





EAGLE Registrations Inc.
SERVICE • INTEGRITY • VALUE



Certificate No. 5959 (Issued – September 6, 2019 - 2 Copies)
September 6, 2019 through September 6, 2022

Certificate of Registration

This is to certify that the Quality Management System of

Bulk Natural LLC, DBA True Terpenes

2416 North Hayden Island Drive, Portland, Oregon 91217, USA

Additional Addresses:

4080 SE International Way, Portland, Oregon, 97222, USA
Activities: (R & D / Product Design)

Has been assessed by **EAGLE Registrations Inc.** and
conforms to the following standard:

ISO 9001:2015

Scope of Registration

Design and manufacturing of terpenes, flavor ingredients and isolates.

Director of Certification

40 N. Main Street, Suite 1880 | Dayton, OH 45423 | USA | 937.293.2000 or 800.795.3641
www.eaglecertificationgroup.com

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True Grade Compliance Packet



EAGLE Food Registrations Inc.
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Certificate No. 10975
July 3, 2019 through July 3, 2020

Certificate of Completion

Bulk Natural LLC, DBA True Terpenes

2416 N. Hayden Island Drive, Portland, Oregon, 91217 USA

Has been assessed by **EAGLE** Food Registrations Inc. and
conforms to the following standard:

EAGLE GMP Audit including HACCP Principles

Scope

Manufacture of Terpenes and Terpene Blends.

Chief Technical Officer





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Quality Statement *What We Stand For*

True Terpenes' mission is to produce and deliver safe and secure products to our customers throughout the world. Further, we promise to provide leadership, education and advocacy in ensuring that policy and practices are in place for products' purity, precision and transparency.

Our commitment is to never compromise on the safety, compliance or quality of our products and services. In order to reach this goal True Terpenes empowers employees with education and the tools to ensure the safety of our staff, neighbors, families, customers and brands.

True Terpenes sets the industry standard by consistently discovering and developing best practice policies along with a system of checks and balances to ensure that all terpenes are high quality.

We are committed to the continual improvement of our quality management system and compliance with all applicable regulatory requirements.

We inspire and facilitate the creation of high-quality products that promote happy and healthy living. We are committed to providing great service and respect to our customers, community and environment.

We are of the people, by the people and for the people. We are True.

Flavor is Our Passion, Quality is Our Promise





Food Safety Plan Table of Contents

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1. Food Safety Statement

1.1 Food Safety Mission

Bulk Natural LLC, DBA True Terpenes is committed to providing Safe and Secure products to its customers throughout the USA and the world and will take a leadership role in ensuring that policies and practices are in place.

We are a wholesale distribution company based out of Portland, OR that focuses on helping small businesses grow and expand their product lines. We work with the approved suppliers around the country to get the safest and highest quality extracts possible.

1.2 Policy Statement

Bulk Natural LLC DBA True Terpenes' top management recognizes the importance of food safety throughout the food supply chain particularly at all stages where True Terpenes performs food sourcing, storage, handling, processing, packaging, and distribution. Everyone within the organization has the collective responsibility of food safety and has a moral obligation to safeguard each other, our customers and the consumers. A positive food safety culture has been nurturing within the organization. True Terpenes is committed to taking all responsible steps and precautions and exercising our due diligence to protect and preserve the human food chain in our custody.

To ensure best practice, True Terpenes operates under current Good Manufacturing Practices (cGMP) and has established the internationally recognized Hazard Analysis Critical Control Point (HACCP) system and follows ISO 9001:2015 and FSSC 22000 Food Safety standards.

To achieve our goal, we:

- Apply the sound food technology, science, industry best practice into our context
- Perform regular identification of hazards, determination of critical control points and timely implementation of effective control and monitoring measures
- Conform with the regulatory requirements and the agreed customer requirements
- Define the food safety objectives and continually review to ensure consistent compliance
- Communicate, implement and maintain this policy at all levels of the company
- Employ competent staff, reliable contractors and source from reputable suppliers
- Provide our personnel with adequate food safety information, training, instructions, tools and equipment to carry out their job in a hygienic and professional manner
- Promote personal hygiene and cleanliness to our staff, contractors, suppliers and visitors
- Develop and strive to continually improve our processes capable of delivery of safe food products through an efficient, effective and sustainable food safety management system



1. Food Safety Statement (cont.)

1.3 Specific Policies

- **Supplier Qualification:** All suppliers, vendors, and laboratories must be qualified and approved in order to ensure all materials are purchased from safe, secure, and reliable sources.
- **Safety Testing:** All new lots of terpene isolates are tested for residual solvents, pesticides and heavy metals prior to packing and blending. Any isolate which does not meet our product specifications is quarantined and is not used in packing and blending.
- **Worker Hygiene and Sanitation Procedures:** Every person who is hired to work in production must have documented training in Current Good Manufacturing Practices (cGMP). This includes procedures such as proper hygiene and hand washing, using Proper Protective Equipment (PPE), not allowing ill workers to be in production areas, and general housekeeping.
- **Environmental Monitoring:** The plant premises are monitored for bacteria such as Salmonella, Listeria monocytus, and E.Coli.
- **Product Traceability:** Bulk Natural LLC, DBA True Terpenes is able to trace back to the plant any lot of the product that has been distributed or sold.

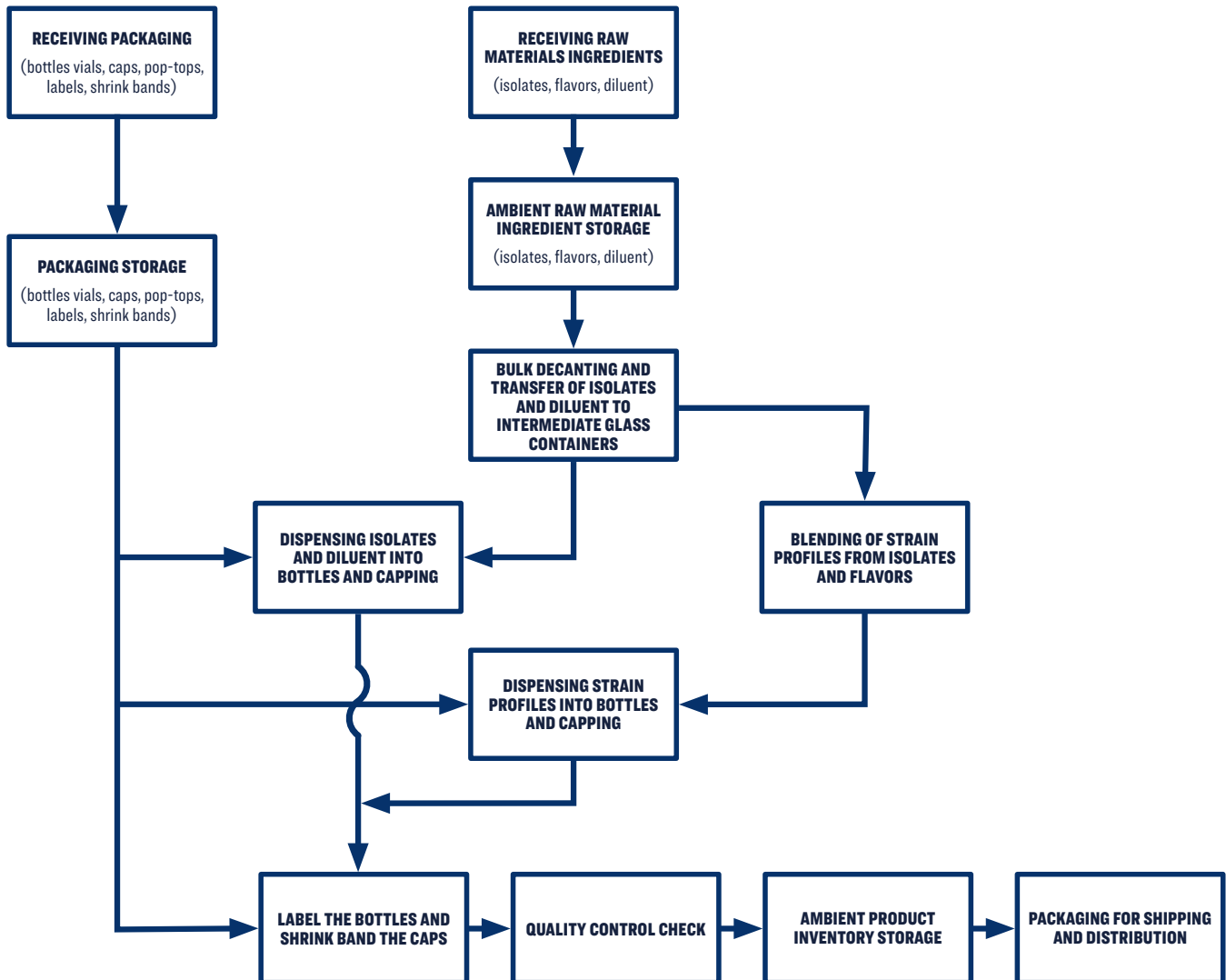
The ultimate goal of these standards, and the procedures that support them, is to guarantee the delivery of safe and reliable products to our customers.

To ensure that we practice what we preach, our plant is audited by an independent third party. The third party has no stake in the outcome of the audits. The auditor's mandate is to assess the compliance of our plant with the standards we have set. Through the use of third party audits, we are able to increase the consumer's level of confidence in the safety of our products and maintain our integrity.

Implementation is always the key to success. Our Quality and Regulatory department keeps detailed records of all policies, procedures, and methods.



2.4 Flow Diagram



1. General Personal Safety and Hygiene

- a. Mouth Pipetting is strictly prohibited. Pipetting aids are available, therefore mouth pipetting of any material regardless of safety hazard is not allowed, at anytime.
- b. Smoking is prohibited anywhere on the premises.
- c. No food is permitted in production areas, including but not limited to food, drinks, chewing gum/tobacco, candy, lozenges and cigarettes. Medication may be stored in personal lockers, but is prohibited in production and warehouse areas.
- d. Personnel shall refrain from sneezing or coughing over materials or products. Spitting (expectorating) is prohibited.
- e. Uniforms and Protective Clothing: All plant personnel and technicians are to wear a lab coat or jacket over street clothes when in the production area. Bulk Natural provides the lab coats. Lab coats must be removed when entering the lunch area. Lab coats contaminated by chemicals must be removed and placed for washing. Other protective clothing such as gowns, gloves, masks, goggles, hair and beard nets and aprons are provided when needed. Plant goggles or glasses are to be worn AT ALL TIMES when working in the production areas.
- f. Other Clothing and Grooming: Shoes that are worn in the lab should be comfortable and cover the entire foot (lace or loafer style). It is strongly recommended that shoes with open toes and/or heels not be worn when working in technical areas. Long Hair shall be secured back and off the shoulders. Loose Jewelry such as bracelets or long necklaces shall not be worn in production. Medical imperatives are allowed with permission. The application of cosmetics or other personal grooming is prohibited in technical work areas. Fingernails are to be kept clean and trimmed. Use of nail polish, false nails and false eyelashes are prohibited in production areas. Carrying writing implements behind the ears is prohibited.
- g. Personal lockers: Employees are given lockers in the lunchroom to store any personal items. Storage of product contact tools or equipment in personal lockers is prohibited. Lockers and storage areas will be inspected randomly or if there is any knowledge of suspicious activity. Lockers and storage areas will be cleaned regularly and will be kept free from rubbish or soiled clothing. Personal items such as coats, jackets, bags, etc. are not allowed to be carried into the plant and must remain in the break area or in lockers. Medication may be stored in personal lockers, but is prohibited in the production areas. No personal items are to remain in personal lockers during non-working hours.
- h. The following is Performed in the Production Area only:
 - i. Ensure that when gloves are worn, the gloves cover the end sleeve of the lab coat so that no skin is visible,
 - ii. Ensure lab coats do not come in contact with product containers,
 - iii. Perform pre-operational check at the beginning of each work day.
 - iv. Clean working stations before and after task completion,
 - v. If a spill occurs on the working stations, report the spill to management and clean up immediately.

Hygiene Policy (cont.)

- i. Hand Washing
 - i. Proper hand washing steps are:
 - ii. Rinse hands; Apply soap; Scrub and lather soap for 25-30 seconds; Rinse hands thoroughly; and Dry with a paper towel. Apply hand sanitizer following hand washing. Using hand sanitizer DOES NOT replace proper hand washing.
 - iii. Hands must be washed:
 - 1. At the start of each shift (at start-up, after lunch and breaks);
 - 2. After using the bathroom or smoking;
 - 3. After blowing nose, coughing, sneezing, etc.;
 - 4. After picking up items from the floor;
 - 5. Any time your hands become contaminated (touch dirty surfaces, garbage bins, etc.); and
 - 6. When entering the production area from a less-clean area (e.g. outside or warehouse).
- j. Illness: If an employee has experienced symptoms of an infectious disease (ie. diarrhea, vomiting, sores/wounds, sore throat, fever, etc.) within the last 24 hours, the employee shall report illness to management and shall be prohibited to work and sent home by his/her supervisor to protect the other employees and the safety of the food. Personnel with wounds or burns shall be required to cover them with brightly colored or metal detectable dressings if in the production area. Any lost dressing shall be reported to management immediately.





Allergen / Sensitive Agents Identification Sheet **Products: Terpene Isolates and Blends**

* A check mark(✓) indicates the Allergen/Sensitive Agent is present. If blank, it means that to the best of our knowledge, there are no Allergen / Sensitive agents present.

Allergen / Sensitive Agent	Source of Allergen in the Product*	Present in Product*	Present on the Same Line*	Present in the Facility*
CORN & CORN PRODUCTS (Includes modified starch, hydrolyzed protein, sweeteners, sugars, spice carriers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EGG & EGG PRODUCTS (liquids and powders)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
FISH (Includes any and all species of fresh and saltwater fish)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
GARLIC (Dehydrated, powdered, granules, and flakes)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
GLUTEN (Wheat, rye, barley, oats, flour, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
MILK & DAIRY PRODUCTS (Includes whey, lactose, cheese, casein, spice carriers, milk, cream, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
MONOSODIUM GLUTAMATE	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PEANUTS, PEANUT OIL & PEANUT DERIVED ITEMS (Peanut meal, flour & ground nuts, szechuan sauce, mandelona nuts, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SESAME SEEDS & SESAME OIL	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CRUSTACEANS (Shrimp, lobster, rock lobster, crab, crayfish, and products made from them)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
MOLLUSKS (Clams, mussels, oysters, scallops, and products made from them)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SOY (Includes soya powder, protein, oil, lecithin, tofu)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SULFITES (Includes sulfur dioxide, sodium dithionite, chemicals that lists sulfite, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TREE NUTS (Includes almonds, beechnuts, brazil nuts, nutmeg, cashews, chestnuts, coconut, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
WHEAT (Includes hydrolyzed wheat protein, flour, gluten flour, starches)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
MUSTARD & MUSTARD OIL	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
LUPIN	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CELERY	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

There are currently no allergens on-site or in the products, however there is an allergen control program in place if potential allergenic material were to be introduced.



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Product Specifications

<i>Residual Solvent</i>	<i>CAS No.</i>	<i>USP Limits ppm (1)</i>	<i>CA and CO Limits ppm (2)</i>
Category I Residual Solvent or Processing Chemical			
1,2-Dichloroethane	107-06-02	5	1.0
Benzene	71-43-2	2	1.0
Chloroform	67-66-3	60	1.0
Ethylene Oxide	75-21-8	N/A	1.0
Methylene Chloride	75-09-2	600	1.0
Trichloroethylene	79-01-6	80	1.0
Category II Residual Solvent or Processing Chemical			
1,4-Dioxane	123-91-1	380	N/A
1-Butanol	71-36-3	5000	N/A
1-Pentanol	71-41-0	5000	N/A
1-Propanol	71-23-8	5000	N/A
2-Butanol	78-92-2	5000	N/A
2-Butanone	78-93-3	5000	N/A
2-Ethoxyethanol	110-80-5	160	N/A
2-Methylbutane *	78-78-4	5000	N/A
2-Propanol (IPA)	67-63-0	5000	5000, < 1000 (Colorado State)
Acetone	67-64-1	5000	5000, < 1000 (Colorado State)
Acetonitrile	75-05-8	410	410
Butane *	106-97-8	5000	5000, < 1000 (Colorado State)
Cyclohexane	110-82-7	3880	N/A



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Product Specifications (cont.)

Residual Solvent	CAS No.	USP Limits ppm (1)	CA and CO Limits ppm (2)
Dichloromethane	75-09-2	N/A	600
2,2-Dimethylbutane **	75-83-2	290	290, < 60 (Colorado State)
2,3-Dimethylbutane **	79-29-8	290	290, < 60 (Colorado State)
1,2-Dimethylbenzene	95-47-6	See Xylenes	See Xylenes
1,3-Dimethylbenzene	108-38-3	See Xylenes	See Xylenes
1,4-Dimethylbenzene	106-42-3	See Xylenes	See Xylenes
Dimethyl Sulfoxide	67-68-5	5000	N/A
Ethanol	64-17-5	5000	5000, < 1000 (Colorado State)
Ethyl Acetate	141-78-6	5000	5000
Ethylbenzene	100-41-4	See Xylenes	See Xylenes
Ethyl Ether	60-29-7	5000	5000
Ethylene glycol	107-21-1	620	N/A
Heptane	142-82-5	5000	5000, < 1000 (Colorado State)
n-Hexane	110-54-3	290	290, < 60 (Colorado State)
Isopropyl Acetate	108-21-4	5000	N/A
Methanol	67-56-1	3000	3000
Methylpropane *	75-28-5	5000	5000, < 1000 (Colorado State)
2-Methylpentane **	107-83-5	290	290, < 60 (Colorado State)
3-Methylpentane **	96-14-0	290	290, < 60 (Colorado State)
N,N-Dimethylacetamide	127-19-5	1090	N/A
N,N-Dimethylformamide	68-12-2	880	N/A
Pentane	109-66-0	5000	5000, < 1000 (Colorado State)
Propane	74-98-6	5000	5000, < 1000 (Colorado State)



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Product Specifications (cont.)

Residual Solvent	CAS No.	USP Limits ppm (1)	CA and CO Limits ppm (2)
Pyridine	110-86-1	200	N/A
Sulfolane	126-33-0	160	N/A
Tetrahydrofuran	109-99-9	720	N/A
Toluene	108-88-3	890	890, < 180 (Colorado State)
Xylenes ***	1330-20-7	2170	2170, < 430 (Colorado State)

N/A - Not Available, the lowest limit will apply.

* Limit based on similarity to pentane.

** Limit based on similarity to n-hexane.

*** Combination of: 1,2-dimethylbenzene, 1,3-dimethylbenzene, 1,4-dimethylbenzene, and ethyl benzene.

Pesticide	CAS No.	Limits ppm (3)
Category I Residual Pesticide		
Aldicarb	116-06-03	ND
Carbofuran	1563-66-2	ND
Chlordane	57-74-9	ND
Chlorfenapyr	122453-73-0	ND
Chlorpyrifos	2921-88-2	ND
Coumaphos	56-72-4	ND
Daminozide	1596-84-5	ND
ODVP (Dichlorvos)	62-73-7	ND
Dimethoate	60-51-5	ND
Ethoprophos	13194-48-4	ND
Etofenprox	80844-07-01	ND



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Product Specifications (cont.)

Pesticide	CAS No.	Limits ppm (3)
Category I Residual Pesticide (cont.)		
Fenoxycarb	72490-01-08	ND
Fipronil	120068-37-3	ND
Imazalil	35554-44-0	ND
Methiocarb	2032-65-7	ND
Methyl Parathion	298-00-0	ND
Mevinphos	7786-34-7	ND
Paclobutrazol	76738-62-0	ND
Propoxur	114-26-1	ND
Spiroxamine	118134-30-8	ND
Thiacloprid	111988-49-9	ND
Category II Residual Pesticide (Inhalables)		
Abamectin	71751-41-2	0.07
Acephate	30560-19-1	0.1
Acequinocyl	57960-19-7	0.1
Acetamiprid	135410-20-7	0.1
Azoxystrobin	131860-3-3-8	0.02
Bifenazate	149877-41-8	0.02
Bifenthrin	82657-04-03	0.1
Boscalid	188425-85-6	0.1
Captan	0133-06-02	0.7
Carbaryl	63-25-2	0.2
Chlorantraniliprole	500008-45-7	0.2



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Product Specifications (cont.)

Pesticide	CAS No.	Limits ppm (3)
Category II Residual Pesticide (cont.)		
Clofentezine	74115-24-5	0.1
Cyfluthrin	68359-37-5	1
Cypermethrin	52315-07-08	1
Diazinon	333-41-5	0.1
Dimethomorph	110488-70-5	2
Etoxazole	153233-91-1	0.1
Fenhexamid	126833-17-8	0.1
Fenpyroximate	134098-61-6	0.1
Fonicamid	158062-67-0	0.1
Fludioxonil	131341-86-1	0.1
Hexythiazox	131341-86-1	0.1
Imidacloprid	138261-41-3	0.02
Kresoxim-Methyl	143390-89-0	0.1
Malathion	121-75-5	0.2
Metalaxyl	57837-19-1	0.2
Methomyl	16752-77-5	0.4
Myclobutanil	88671-89-0	0.04
MGK-264	113-48-4	0.2
Naled	300-76-5	0.1
Oxamyl	23135-22-0	0.5
Pentachloronitrobenzene	82-68-8	0.1
Permethrins	52645-53-1	0.04



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Product Specifications (cont.)

Pesticide	CAS No.	Limits ppm (3)
Category II Residual Pesticide (cont.)		
Phosmet	0732-11-6	0.1
Piperonyl Butoxide	51-03-6	2
Prallethrin	23031-36-9	0.1
Propiconazole	60207-90-1	0.1
Pyrethrins	8003-34-7	0.5
Pyridaben	96489-71-3	0.1
Spinetoram	187166-40-1	0.1
Spinosad	168316-95-8	0.06
Spiromesifen	283594-90-1	0.03
Spirotetramat	203313-25-1	0.02
Tebuconazole	80443-41-D	0.01
Thiamethoxam	153719-23-4	0.02
Trifloxystrobin	141517-21-7	0.1

Heavy Metals	Limits ppm (4)
Arsenic	0.2
Cadmium	0.2
Lead	0.5
Mercury	0.1



QA APPROVED

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Product Specifications (cont.)

Comments

1. USP (United States Pharmacopeia) Residual Solvents Limits are applied to undiluted raw materials (isolates.)
2. CA and CO Residual Solvents Limits (the lowest allowed limits among states of CA, CO, OR, and WA) are applied to undiluted Finished Products (profiles, flavors.)
3. Pesticides limits are the lowest limits in the USA and are applied to undiluted raw materials (isolates,) profiles, and flavors.
4. Heavy Metals Limits are the lowest allowed limits in the USA and are applied to undiluted raw materials (isolates,) profiles, and flavors.

Document Prepared: QA Engineer Geneva Ford

Signature Geneva Ford Date: 1/29/19

Document Verified: INVENTORY & LOGISTICS MGR. JEFFREY HEAT

Signature: J. Heat Date: 1/29/19

Document Approved: QR manager Alesya Bradley

Signature: A Bradley Date: 1/29/19



Frequently Asked Questions

Question 1: What is True Grade?

We are cGMP, ISO 9001:2015 and FSSC 22000 certified. We follow the strictest limits across 50 states when analyzing each raw material and each finished product lot for safety (Residual Solvents, Pesticides and Heavy Metals.)

Question 2: What is cGMP?

Current Good Manufacturing Practice (GMP) is a system for ensuring that products are consistently produced and controlled according to quality standards. It is designed to minimize the risks involved in any pharmaceutical production that cannot be eliminated through testing the final product.

Question 3: What is ISO 9001:2015?

ISO 9001:2015 (International Standard Organization) specifies requirements for a quality management system when an organization:

- a. needs to demonstrate its ability to consistently provide products and services that meet customer and applicable statutory and regulatory requirements, and
- b. aims to enhance customer satisfaction through the effective application of the system, including processes for improvement of the system and the assurance of conformity to customer and applicable statutory and regulatory requirements.

All the requirements of ISO 9001:2015 are generic and are intended to be applicable to any organization, regardless of its type or size, or the products and services it provides.

Question 4: What is FSSC 22000?

FSSC 22000 (Food Safety System Certification) is a company-level certification based on a scheme developed by the Foundation for Food Safety Certification. The standard helps organizations ensure the supply of safe food and beverages. In addition to the requirements set forth in this certification, FSSC 22000 fully incorporates ISO 22000 and prerequisite programs. This certification is intended for agricultural and food and beverage businesses that manufacture or process food products, ingredients, and packaging materials. Certifications are issued by a licensed third party certifying bodies. To maintain FSSC 22000, companies will be subjected to annual or regularly scheduled audits to evaluate the organization's continued compliance to the standard.

Question 5: What is HACCP?

HACCP stands for Hazard Analysis and Critical Control Points. This is a preventative food safety system in which every step in the manufacture, storage and distribution of a food product is scientifically analyzed for microbiological, physical and chemical hazards.



Frequently Asked Questions (cont.)

Question 6: What is ISO/IEC 17025?

We perform products (raw materials and finished goods) testing in ISO/IEC 17025 certified laboratories. The laboratory developed and validated methods to test for Residual Solvents, Pesticides and Heavy Metals specifically following our True Grade Specifications (see attached Master Product Specifications Document).

ISO/IEC 17025 General requirements for the competence of testing and calibration laboratories is the main ISO standard used by testing and calibration laboratories. In most countries, ISO/IEC 17025 is the standard for which most labs must hold accreditation in order to be deemed technically competent.

Question 7: Why does certification matter?

Certification shows that the company has adequately demonstrated to a third-party that it meets the requirements of a certain standard and is dedicated to continuous improvement, managing risk, and maintaining customer satisfaction. The result of an effective quality system is consistent, safe, and quality products.

Question 8: Do you have a Recall Plan?

Yes, it is a part of Food Safety Plan. Mock recalls are performed semi-annually. We have total traceability from bulk materials to every product sent to every customer.

Question 9: What documents are available on the website?

COA (Certificate of Analysis), SDS (Safety Data Sheets), Quality Statement, Food Safety Statement, GMP certificate, ISO 9001:2015 certificate, FSSC 22000 certificate.

Question 10: What documents can be requested from Quality Assurance?

Summary of audit reports, Certificates of Compliance, Safety Reports, Master Ingredient list for each product (with Non-Disclosure Agreement signed).

Question 11: Do you have regulatory registrations, liability insurance, etc?

Yes, we have the following documents: Current Food Processing License, current FDA registration, Liability Insurance. These documents are available per request.

