

Food Safety Audit Procedures

This procedure creates a monthly GWSI Food Safety System review process, ensuring that every warehouse location enforces and sustains our guidelines and standards. Additionally, we will conduct an annual audit encompassing the Food Safety Plan, storage and distribution practices, and other components of the Food Safety System. This yearly audit will also account for the impact of any updates to the Food Defense Plan. Once every three years, we will conduct an extensive review of the Food Defense Plan.

Food Safety Team

The Food Safety Team will consist of the following employees:

- **Tom Kenny:** President of GWSI Inc.
- **Kevin Burke:** Chief Commercial Officer M. Gerace Enterprises Inc.
- **Jason Ryser:** Food Defense Coordinator
- Qualified Individual (QI) for each Warehouse Location
- Warehouse Manager for each Warehouse Location

Monthly Review

1. Each month, the QI at the warehouse location shall prepare and present a report to the Food Safety Team. This report will consist of the following:
 - a. Warehouse Inspections and new action items
 - b. Status of any open action items
 - c. Any new Customer Complaints
 - d. Status of any open Customer Complaints
 - e. Equipment maintenance concerns related to Food Safety
 - f. Facility maintenance concerns related to food safety
 - g. Potential new business
2. The Food Defense Coordinator (FDC) will document the receipt and review the monthly QI reports to verify that procedures and standards are implemented and maintained at each warehouse location. The FDC will also arrange a monthly meeting with the QIs to review

their reports and action items related to the overall Food Safety Plan. The objective is to maintain consistency of the Food Safety System across all warehouse locations.

Annual Review

1. The Food Safety Team will conduct an annual review of the Food Safety System. This review will occur thirty to sixty days before the annual Safe Quality Food (SQF) audit or in the first week of October each year if the SQF audit schedule is unavailable.
2. The annual review of the Food Safety System should include but not limited to:
 - a. The policy manual
 - b. Internal and external audit findings
 - c. Corrective actions and their investigations and resolution
3. Customer complaints and their resolution and investigation:
 - a. Hazard and risk management system
 - b. Follow-up action items from previous management Internal and external audit findings
4. Preparation for the annual audit
 - a. Download the Copy of SQF Food Safety Code for Storage and Distribution Edition 9 Checklist.xlsx from the previous year.
 - b. Download the FDA Food Defense Guidance Updates for the current audit. (<https://www.fda.gov/food/guidance-documents-regulatory-information-topic-food-and-dietary-supplements/food-defense-guidance-documents-regulatory-information>)
 - c. Compile procedures for review.
5. Process
 - a. Review each procedure to determine if the procedure is still relative to existing operations.
 - b. Review each procedure to determine if the existing procedure fulfills any change in the standard.
 - c. Initiate a risk assessment to decide whether any existing procedures require modifications. We also use the risk assessment to decide if we need to apply any extra control measures.
 - d. Modify procedures as required.
 - e. Update the revision date on each procedural change.
 - f. Develop new procedures as necessary.

6. Implement any changes in procedure and or new strategy.
7. Document any changes in the procedure.
 - a. Present a list of the reviewed procedures, noting down where any changes were necessary.
 - b. Update the revision date on each document.
8. Defined Blackout Periods for re-certification audits will be reviewed for each site. The Food Defense Coordinator will advise the auditing agency of the Blackout dates for the upcoming year.