SQF Food Safety Audit Edition 9

Borton Zillah Plant - 6916

Summary

Audit Decision
Certified

Decision Date
August 18, 2026

Recertification Date
June 15, 2027

Expiration Date
August 29, 2027

Issue Date
August 18, 2026

Certificate Number
6916

Audit Type
Recertification

On-Site Audit Dates
July 1, 2026 - July 2, 2026

ICT Dates
-

Audit Rating



Excellent

Facility and Scope

Borton Zillah Plant - 6916

1151 Cutler Way
Zillah, WA 98953 United States

Products
Cherries

Food Sector Categories
04. Fresh Produce, Grain, and Nut Packhouse Operations

Scope of Certification
Packing of Cherries

Exclusions
na

Certification Body and Audit Team

QIMA Food Certification, LLC

15720 Brixham Hill Ave
Suite 320
Charlotte, NC 28277-4651 United States

CB#: 42253
Accreditation Body: ANAB
Accreditation Number: 1226

Lead Auditor: LADUN ODUGBESAN (C-429827)
Technical Reviewer: Ajaypal Singh (C-470741)

Hours Spent on Site: 12
Hours of ICT Activities:
Hours Spent Writing Report: 8

Section Responses

Audit Statement - Audit

SQF Practitioner Name - Name the designated SQF Practitioner

Response: Leo Gonzalez

SQF Practitioner Email - Email of the designated SQF Practitioner

Response: leo.gonzalez@bortonfruit.com

Opening Meeting - People Present at the Opening Meeting (Please list names and roles in the following format Name: Role separated by commas)

Response: Leo Gonzalez: Dir, Food Safety & SQF Practitioner, Itzayana C.: FS Supervisor, Yajaira A.: Food Safety, Oscar S.:Receiving, Javier G.: Maintenance

Facility Description - Auditor Description of Facility (Please provide facility description include # of employees, size, production schedule, general layout, and any additional pertinent details

Response: Borton & Sons is located in Yakima, WA and consists of two facilities namely. Borton Packing Center (Yakima) and Borton Packing Zillah. Both facilities pack apples and pears (Yakima) and cherries (Zillah). The Yakima facility is approximately 900,000 sq. feet and the Zillah facility is about 200,000 sq. feet. The Yakima facility operates through the year and the Zillah facility operates during the cherry season, which lasts from 4 to8 weeks, depending on the season variations. The Yakima site packs, stores, and distributes Anjou pears and various varieties of apples (honeycrisp, Fuji, Gala, Cosmic Crisp, Red Delicious, and many others. At the Zillah, two varieties of cherries are packed - rainier and red cherries. There are approximately 260 employees with up to 120 workinmg at the Zillah site during the cherry season. during the peak seson. Both sites contain approximately 70 cooling and controlled atmosphere rooms. Controlled atmosphere is used in any of the rooms depending on availability. Controled atmosphere is only used for apples. Adjacent land at the Zillah is mainly company owned farmland, while at Yakima it is mainly industrial and a nearby airport. Commodities are brought from the orchards to the packhouse in bins with applicable information showing the grower, variety, weight (if applicable) and other information. These are washed in a dump tank with hypochorite, sprayed with PAA, waxed and dried and packed into different package sizes and types based on customer requirements. There are up to 16 packing lines of different configurations in Yakima, and two in Zillah, which includes cases, trays, clamshells, and bags. The facilities maintains a HACCP program with identified CCPs. Products can be exported to several countries in Asia and Europe, and other regions as needed. MRLs are requested by USDA based on the customer or country regulations. Customer specific requirements were adhered to on all areas of the program. All corrective actions from the previous audit were confirmed implemented.

Closing Meeting - People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by commas)

Response: Leo Gonzalez: Dir, Food Safety & SQF Practitioner, Brenda Sanchez: Sanitation, Itzayana C.: FS Supervisor, Mike S.: Maintenance, Yajaira A.: Food Safety, Javier G.: Maintenance, Tony F.: Production, Rodriguez B.: Refrigeration, Chad C.: Production, Abigail V.: Sanitation, Abel G.: Shipping, Matt Borton: CEO

Auditor Recommendation - Auditor Recommendation

Response: Recommended for re-certification after successful completion of corrective actions

2.1.1 - Management Responsibility (Mandatory)

2.1.1.1 - Senior site management shall prepare and implement a policy statement that outlines at a minimum the commitment of all site management to: i. Supply safe food; ii. Establish and maintain a food safety culture within the site; iii. Establish and continually improve the site's food safety management system; and iv. Comply with customer and regulatory requirements to supply safe food. The policy statement shall be: v. Signed by the senior site manager and displayed in prominent positions; and vi. Effectively communicated to site personnel in language(s) understood by all site personnel.

Response: Compliant

2.1.1.2 - Senior site management shall lead and support a food safety culture within the site that ensures at a minimum: i. The establishment and documentation of clear and concise food safety objectives and performance measures and their communication to all relevant staff; ii. Adequate resources are available to meet food safety objectives and performance measures; iii. Food safety practices and all applicable requirements of the SQF System are adopted and maintained; iv. Staff are informed and are aware of their food safety and regulatory responsibilities; v. Staff are informed and held accountable for their food safety and regulatory responsibilities; vi. Staff are positively encouraged and required to notify management of actual or potential food safety issues; and vii. Staff are empowered to act to resolve food safety issues within their scope of work.

Response: Compliant

2.1.1.3 - The reporting structure shall identify and describe the site personnel with specific responsibilities for tasks within the food safety management system and identify backup for absence of key personnel. Job descriptions for the key personnel shall be documented.

Response: Compliant

2.1.1.4 - Senior site management shall designate a primary and substitute SQF practitioner for each site with responsibility and authority to: i. Oversee the development, implementation, review, and maintenance of the SQF System, including Good Agricultural/Operating Practices outlined in 2.4.2, and the food safety plan outlined in 2.4.3. ii. Take appropriate action to ensure the integrity of the SQF System; and iii. Communicate to relevant personnel all information essential to ensure the effective implementation and maintenance of the SQF System

Response: Compliant

2.1.1.5 - The primary and substitute SQF practitioner shall: i. Be employed by the site; ii. Hold a position of responsibility in relation to the management of the site's SQF System; iii. Be competent to implement and maintain HACCP-based food safety plans; and iv. Have an understanding of the SQF Food Safety Code: Primary Plant Production and the requirements to implement and maintain an SQF System relevant to the site's scope of certification.

Response: Compliant

2.1.1.6 - Senior site management shall ensure the training needs of the site are resourced, implemented, and meet the requirements outlined in system elements 2.9 and that site personnel have met the required competencies to carry out those functions affecting the legality and safety of food products.

Response: Compliant

2.1.1.7 - Senior site management shall ensure the integrity and continued operation of the food safety system in the event of organizational or personnel changes within the company or associated facilities.

Response: Compliant

2.1.1.8 - Senior site management shall designate defined blackout periods that prevent unannounced re-certification audits from occurring out of season or when the site is not operating for legitimate business reasons. The list of blackout dates and their justification shall be submitted to the certification body a minimum of one (1) month before the sixty (60) day re-certification window for the agreed-upon unannounced audit.

Response: Compliant

Summary -

Response: SOP Management Responsibility. Food Safety Team/Management Team consists of the Production, Maintenance, Refrigeration, , Shipping/Receiving, Food Safety, and Sales, SQFP, and others as needed. Meetings are monthly; meeting minutes of June 2 consists of topics such as maintenance updates, FSQA developing new procedure for new gases, FSC - create 'badges' for employees who have certification/specialized training, color-codes for utensils, crisis challenge (Fire Drill), CAPA, follow up from previous meeting. The policy statement is posted on bulletin boards (signed by CEO & SQFP) and reviewed with employees annually. The organization has a commitment to deliver safe food and maintain a food safety culture. There is an organizational chart showing roles and reporting structures (backups identified), with food safety responsibility. Job descriptions are electronically updated. There is a training program discussed during management meetings and supported by the SQFP. Training is electronic and uses videos, pictures, colors and so on. Verification is conducted annually during the SQF verification exercise. This audit is announced, blackout periods are general public holidays.

2.1.2 - Management Review (Mandatory)

2.1.2.1 - The SQF system shall be reviewed by senior site management at least annually and include: i. Changes to food safety management system documentation (policies, procedures, specifications, food safety plan); ii. Food safety culture performance; iii. Food safety objectives and performance measures; iv. Corrective and preventative actions and trends in findings from internal and external audits, customer complaints, and verification and validation activities; v. The hazard and risk management system; and vi. Follow-up action items from previous management review. Records of all management reviews and updates shall be maintained.

Response: Compliant

2.1.2.2 - The SQF Practitioner(s) shall update senior site management on at least a monthly basis on matters impacting the implementation and maintenance of the SQF System. The updates and management responses shall be documented.

Response: Compliant

Summary -

Response: SOP Management Responsibility (1/2/26). Management review meetings are monthly and hosted jointly by SQFP. Food safety objectives include: Prevention of Contamination (no out of spec for all process tests such as water, air, ATP, EMP - status on track), ensure proper hygiene by reducing GMP violations by 50%, (status 80%), educate Staff (collect baseline information on accidents & near-misses).. Food safety culture is encouraged through the use of employee meetings, separate food safety budget, monthly management meetings with SQFP, employee suggestions, visual recognition through the use of badges. June HACCP meeting was a review of the program. All elements of the Code were reviewed during the audit. Records: management review meetings 1/8/26, 6/2/265, collectively contained discussions of most programs.

2.1.3 - Complaint Management (Mandatory)

2.1.3.1 - The methods and responsibility for handling, investigating, and resolving complaints from commercial customers, consumers, and authorities arising from products grown or handled on-site, shall be documented and implemented.

Response: Compliant

2.1.3.2 - Adverse trends of customer complaint data shall be investigated and analyzed, and root cause established by personnel knowledgeable about the incidents.

Response: Compliant

2.1.3.3 - Corrective and preventative action shall be implemented based on the seriousness of the incident and the root cause analysis as outlined in 2.5.3. Records of customer complaints, their investigation and resolution shall be maintained.

Response: Compliant

Summary -

Response: SOP Product/Customer Complaints, 1/2/26. Complaints are received from the Sales Trouble Report Form STR). This procedure applies to customer problems that are reported, deviations from internal audits, and others as required. Complaints are managed though the Chelan Fruit Sales team, which issues the STR form. Production Managers have the responsibility to review all complaints and assign appropriate resources for the investigation. A CAR (Form 03-03) documents the investigation results and actions. Food safety complaints are given higher priority and involves oversight by the SQFP. In 2026, there has been one foreign matter complaint reported by the customer (CAR 2026002). The complaint was considered a food safety complaint and investigations and actions were done jointly by Production and QA. The complaint is still being investigated. There have been no other food safety complaints. All food safety complaints require a CAPA process. Results of reviews will be used to either pursue further corrective action until the problem is solved or close the file if the solution was successful. The Production Manager (or his designee) will close the Trouble Report.

2.2.1 - Food Safety Management System (Mandatory)

2.2.1.1 - The methods the site uses to meet the requirements of the SQF Food Safety Code: Primary Plant Production shall be maintained in electronic and/or hard copy documentation. They will be made available to relevant staff and include: i. Food safety policies and organization chart; ii. Products covered under the scope of certification; iii. Food safety regulations that apply to the site and to the country of sale if known; iv. Agricultural inputs/materials, packaging materials, and finished product specifications; and v. Written procedures and programs (Good Agricultural Practices and/or Good Operational Practices) and other documentation necessary to support the development, implementation, maintenance, and control of the SQF System (e.g., food safety plans, validation, and verification).

Response: Compliant

2.2.1.2 - Food safety plans, Good Agricultural/Operating Practices, and all relevant aspects of the SQF System shall be reviewed, updated, and communicated as needed when any potential changes implemented have an impact on the site's ability to deliver safe food. The reason for the change shall be documented.

Response: Compliant

Summary -

Response: SOP Product/Customer Complaints, 1/2/26. Complaints are received from the Sales Trouble Report

Form STR). This procedure applies to customer problems that are reported, deviations from internal audits, and others as required. Complaints are managed though the Chelan Fruit Sales team, which issues the STR form. Production Managers have the responsibility to review all complaints and assign appropriate resources for the investigation. A CAR (Form 03-03) documents the investigation results and actions. Food safety complaints are given higher priority and involves oversight by the SQFP. In 2026, there has been one foreign matter complaint reported by the customer (CAR 2026002). The complaint was considered a food safety complaint and investigations and actions were done jointly by Production and QA. The complaint is still being investigated. There have been no other food safety complaints. All food safety complaints require a CAPA process. Results of reviews will be used to either pursue further corrective action until the problem is solved or close the file if the solution was successful. The Production Manager (or his designee) will close the Trouble Report.

2.2.2 - Document Control (Mandatory)

2.2.2.1 - The methods and responsibility for maintaining document control, including records, shall be documented and implemented. They shall ensure that documents and records are i. Controlled; ii. Current; iii. Safely stored to prevent unauthorized access, loss, damage, and deterioration; iv. Organized in a registry or listing form; and v. Readily accessible in a manner that ensures employees use up-to-date and current policies, procedures (work instructions/task lists), and forms when documenting food safety related activities.

Response: Compliant

Summary -

Response: SOP Document & Data Control P-05-01 (4/17/26). Approved copies are electronic and can only be modified by the SQFP. Printed copies are printed as needed. This procedure applies to the distribution, control and maintenance of all documents within Borton & Sons Quality System. There are 3 categories of documents, differentiated by the prefix. The P documents are Quality Policies & Procedures, the F documents are forms, the RM documents are reference material. All finished documents are classified as controlled documents, which can be electronic or hard copy. Records are retained for 2 years and organic records (where applicable) are retained for 5 years. The SQFP is responsible for assuring that the current versions are being utilized. Documents are listed in the document registry table of contents (P-TOC) containing all policies or procedures at the current revision. The registry must be updated for any changes to a document, indexed in Form F-05-08. External quality related documents are logged into the Control of Quality Records (P-05-02). Obsolete documents are segregated and removed from the index. There are approximately 124 documents of which policies and procedures are approximately 105. All records are retained for a minimum of 24 months or longer at customer's request. Program records checked included - sanitation, inspections (receiving & shipping), CIP records, calibration, inspections (daily, GMP)). Food safety records reviewed and signed by FSQA or SQFP.

2.2.3 - Records (Mandatory)

2.2.3.1 - All manual or electronic/digital records shall be legible, suitably authorized, and/or signed by those undertaking activities to demonstrate that inspections, supervisory reviews, testing, and other essential activities have been completed.

Response: Compliant

2.2.3.2 - Records shall be retained in accordance with periods specified by a customer or regulations or at a minimum no less than product shelf life.

Response: Compliant

Summary -

Response: SOP Document & Data Control P-05-01 (4/17/26). Approved copies are electronic and can only be modified by the SQFP. Printed copies are printed as needed. This procedure applies to the distribution, control and maintenance of all documents within Borton & Sons Quality System. There are 3 categories of documents, differentiated by the prefix. The P documents are Quality Policies & Procedures, the F documents are forms, the RM documents are reference material. All finished documents are classified as controlled documents, which can be electronic or hard copy. Records are retained for 2 years and organic records (where applicable) are retained for 5 years. The SQFP is responsible for assuring that the current versions are being utilized. Documents are listed in the document registry table of contents (P-TOC) containing all policies or procedures at the current revision. The registry must be updated for any changes to a document, indexed in Form F-05-08. External quality related documents are logged into the Control of Quality Records (P-05-02). Obsolete documents are segregated and removed from the index. There are approximately 124 documents of which policies and procedures are approximately 105. All records are retained for a minimum of 24 months or longer at customer's request. Program records checked included - sanitation, inspections (receiving & shipping), CIP records, calibration, inspections (daily, GMP)). Food safety records reviewed and signed by FSQA or SQFP.

2.3.1 - Plant Variety/Hybrid or Product Development

2.3.1.1 - The methods and responsibility for designing, developing, and converting product concepts (e.g. new varieties, hybridization, crops, species) to commercial realization shall be documented and implemented and comply with regulatory and customer requirements. Records for new products testing, shelf life, and final approvals shall be maintained.

Response: Compliant

2.3.1.2 - The food safety plan shall be reviewed and revised accordingly for each new product and its associated process through conversion to commercial production and distribution, or where a change to inputs, process, or packaging occurs that may impact food safety.

Response: Compliant

2.3.1.3 - New products shall be tested and inspected to ensure they meet stated shelf life, maximum residue limits (MRLs), and other regulatory and customer requirements (e.g., potency, strength, purity).

Response: Compliant

2.3.1.4 - The process flows for all new and existing processes shall be designed to ensure that products meet specifications and to prevent cross-contamination.

Response: Compliant

Summary -

Response: SOP Product Development Policy, P-02-08 (1/2/26). Product development is limited to new varieties, hybridization, crop and specie changes. Development is conducted externally. Once approved, the food safety plan is reviewed for needed changes. All such developed products undergo the normal testing parameters, depending on the type of product, including any pilot runs. There have been no product development.

2.3.2 - Specifications (Agricultural Inputs, Packaging, Harvested Product, and Contract Services)

2.3.2.1 - Specifications and/or descriptions for seeds, agricultural inputs, packaging, and contract services that impact finished product safety shall be documented, approved, comply with relevant legislation, and kept current through a review process.

Response: Compliant

2.3.2.2 - Food contact packaging, seeds, and agricultural inputs shall be verified to ensure product safety is not compromised and the material is fit for its intended purpose. Verification shall include certificates of conformance, certificate of analysis, or sampling and testing (refer to 2.4.4.1).

Response: Compliant

2.3.2.3 - Finished product specifications shall be documented, approved by the site and its customer where applicable, accessible to relevant staff, and kept current through a review process. Specifications shall include, where applicable: i. Microbiological, purity, strength, composition, and agricultural chemical limits; ii. Maximum residue limits (MRLs) for pesticides; and iii. Labeling and packaging regulatory and customer requirements.

Response: Compliant

2.3.2.4 - The methods and responsibilities for managing contract farms, services (e.g., spraying), packers, or storage and distribution facilities shall be documented and implemented to ensure the following are being met: i. Contract farms and services shall comply with the SQF Food Safety Code: Primary Plant Production and relevant regulatory and customer requirements; ii. Changes to contractual agreements are approved by both parties and communicated to relevant personnel; and iii. Records of all contract reviews and changes to contractual agreements and their approvals are maintained.

Response: Minor

Evidence: • There is no evidence that records of all contract reviews and changes to contractual agreements and their approvals are maintained.

Root Cause: Used 5-Why Problem-Solving Model and 8D Problem Solving Model to find that we believed our Approval Supplier program was sufficient. What we found was that didn't execute service agreements with key partners because we prefer owning all equipment. Most of our key partners "give" the equipment in exchange for a defined period of exclusive partnership. We needed to mesh our business strategies with our food safety requirements.

Corrective Action: Members of the HACCP Team discussed this issue. We then met with Ownership/Senior Management to describe the issue in detail. We went over our Approved Supplier list to see which partners enter our facility to provide maintenance, guidance, and/or calibrate equipment and work to create & finalize service agreements. I met with ChemStation to define their responsibilities by writing and signing a Service Agreement.

Verification Of Closeout: Procedure for approving and documenting service agreements was modified to incorporate all known service providers. Evidence of service agreement with ChemStation provided.

Completion Date: July 13, 2026 **Closeout Date:** July 31, 2026

2.3.2.5 - A register or listing of all specifications and/or descriptions for seeds, agricultural inputs, packaging, and labels, finished products, and contract services shall be maintained and kept current.

Response: Compliant

Summary -

Response: SOP Quality Receiving Fruit Policy (1/5/26). Specifications have been developed for apple and cherries received from the fields. Specification for equipment, utensils, clothing are developed - examples of

general specs for equipment include, easily cleanable, non-contaminating, made of non-toxic materials, must not contain wood, must be smooth and free from crevices, food contact equipment must facilitate cleaning, lubricants are food grade. Packaging suppliers must have a minimum of LOG, 3rd party audit report, food safety management system. For fruits, a 50-fruit sample is collected for QC inspection. Fruits are tested for skin deficiencies, pressure, culls (recorded in F-04-11 (Apple Cull Analysis), graded and sized and pressure tested. Each lot is expected to have less than 20% of culled fruit. including absence of mold or similar deficiencies, The USDA sizing and grading requirements are followed. Inspection results are documented in the Apple In-Process Inspection worksheet (F-04-10). Lots that do not pass specs are held and recorded in the QC Hold form (F-04-03). Current load being run (Gala) during the audit had no hold record. The Costco cherry specs were reviewed, which include parameters such brix, visual inspection specs include, no crown cracking, spurs, torn skin, or split fruit. Minor defects of 10 or less per lot is acceptable, while major defects of 2 per lot is rejected. Contract services must have a minimum of business license and a history of servicing a food facility. Applicable operator or specialized licenses must be obtained and a LOG provided, if applicable. Contract services include pest control, calibration, chemicals, and others.

2.3.3 - Approved Supplier/Input Purchasing Program (Mandatory)

2.3.3.1 - Seeds, agricultural inputs, harvested product, market-ready product, and packaging materials that impact finished product food safety shall be supplied by an approved supplier. The methods and responsibility for selecting, evaluating, approving, and monitoring an approved supplier shall be documented and implemented. The approved supplier program shall contain at a minimum: i. A risk level assigned to each supplier that is based on the past performance of the supplier, criticality to the site, food safety risk, and other relevant factors determined by the site; ii. Agreed specifications; iii. A summary of the food safety controls implemented by the approved supplier, including regulatory compliance and licensing where applicable; iv. Methods for granting approved supplier status; v. Methods and frequency of monitoring approved suppliers, which may include testing, receiving inspection, and/or supplier audits; vi. Methods and frequency of reviewing approved supplier performance and status. Where supplier audits are used as a monitoring tool, they shall be based on risk and conducted by individuals knowledgeable of applicable regulatory and food safety requirements and trained in auditing techniques. A register or list of approved suppliers and records of monitoring activities shall be maintained. Code Amendment #2 Approved supplier registers shall include supplier contact details. All approved and emergency suppliers shall be registered.

Response: Compliant

2.3.3.2 - The receipt of seeds, agricultural inputs, harvested product, market-ready product, and packaging materials from non-approved suppliers shall be acceptable in an emergency situation, provided they are inspected or analyzed before use.

Response: Compliant

2.3.3.3 - Agricultural inputs, harvested product, market-ready product, and packaging materials received from other sites under the same corporate ownership shall be subject to the same specification requirements (refer to 2.3.2), approved supplier requirements, and receiving inspections as all other material providers.

Response: Compliant

Summary -

Response: SOP Supplier Approval, Evaluation & Management Program, 1/2/26. All suppliers complete a supplier questionnaire (F02-01), which is reviewed by the HACCP team during management review meetings.

Fruit suppliers (farms) must be GLOBALGAP certified. Other suppliers may have several documents based on risk level, such as 3rd party audit report, letter of guarantee, CoA, HACCP/Food Safety plan, applicable certifications, and others as needed. The information on the questionnaire is used to determine the supplier risk level. All food contact suppliers (ingredients and packaging) are considered high risk. Non-food contact supplier must complete the questionnaire and provide documentation such as 3rd party audit report, copy of FSMS to include programs such as HACCP, complaints, sanitation, testing program and others selected based on the product or equipment. Suppliers are assessed annually and must provide documentation that are not expired. Assessment is based on GFSI 3rd party audit report, product quality, complaints, service issues, and others as applicable. Specifications for all suppliers is listed in P-02-01 - General Specifications for All Suppliers. Monitoring criteria may include, micro test results, lab test of selected parameters in the finished product, smooth production run-ability and others as necessary. No supplier onsite audits are done unless there is no GFSI certification audit report. The approved supplier list (ASL) was reviewed and contained critical suppliers such as Birdsong (peanuts), Phoenix, Eurofins, among others. Letter of guarantee reviewed include, Phoenix (LOG 3/25/26), Birdsong (LOG 4/21/26), Total number of suppliers approx. 45. Risk assessment is conducted for ingredient suppliers, parameters that may be checked include history of product, any recalls, CoA of product to be supplied. Packaging risk analysis parameters include , GFSI certs, supply history, CoA/CoC, a letter of guarantee(LOG). Annual monitoring includes a review of supply history, annual review meeting with the supplier (where applicable), QA/QC issues. There are no raw materials received from corporate or sister facility. Temporary or emergency suppliers must have at the minimum a GFSI 3rd party audit report or its equivalent. The site does not use temporary or emergency suppliers.

2.4.1 - Food Legislation (Mandatory)

2.4.1.1 - The owner/senior site manager shall ensure that, at the time of delivery to its customer, the food supplied shall comply with food safety and production legislation applicable in the country of use and sale, if known. Any specific licensing requirements or commodity-specific regulations shall be maintained and kept current.

Response: Compliant

2.4.1.2 - The methods and responsibility for ensuring the organization is kept informed of changes to relevant legislation, scientific and technical developments, emerging food safety issues, and relevant industry codes of practice shall be documented and implemented.

Response: Compliant

2.4.1.3 - SQFI and the certification body shall be notified in writing within twenty-four (24) hours as a result of a regulatory warning or event. Notification to SQFI shall be by email to foodsafetycrisis@sqfi.com.

Response: Compliant

Summary -

Response: SOP Food Legislation (1/2/26). Sources include FDA ,SQFI, industry associations, International bakery associations, education extension services, state Dept. of Agriculture., federal agencies SQFP has subscriptions from state and federal regulatory agencies as well as university and state extension services. Newsletters from industry associations such as SQFI are received monthly. Customers also send regulatory information that may affect their products. Industry conferences are attended as budget permits (SQFI Unites). New legislation is shared as soon as the information is known and at weekly management team meetings. A risk assessment is conducted to ascertain if a change in the food safety plan is warranted. The process includes notification of the CB and SQFI within 24 hours of event confirmation.

2.4.2 - Good Agricultural/Operating Practices (Mandatory)

2.4.2.1 - The site shall ensure the applicable Good Agricultural Practices described in modules 7, 8, or 18 and the Good Operating Practices described in module 10 of this Food Safety Code are documented and implemented (refer to 2.2.1.1), or exempted according to a written risk analysis outlining the justification for exemption or evidence of the effectiveness of alternative control measures to ensure that food safety is not compromised.

Response: Compliant

Summary -

Response: All documents are electronic and saved in an electronic folder. The folder contains the FSQA Manual and is organized by SQF programs. There is a food safety policy statement posted in the bulletin board, and the org chart was verified up to date. Several electronic documents were received during the audit and included but not limited to HACCP plan, inspection and monitoring logs, sanitation records, meeting minutes. The document register contains all program documents, GMP and hygiene policies, specifications. supplier management program documents, training documentation and records, calibration, equipment service documents, and others. The SQFP is the responsible owner of the document control and records, and is the only one that can create or edit a document. The company maintains an implemented HACCP program, reviewed annually. Product surveillance is done at customer's request (finished product testing). Pre-requisite programs such as sanitation, maintenance, EMP & ATP, calibration, shipping/receiving, training, and others are established and implemented. Process controls have been defined and are monitored. The HACCP team meets annually to review the program. Weekly production/management meetings are used for sharing of GMP results of observations made during production. SOP GMP & Hygiene outlines GMP requirements such as no smoking, eating in designated areas only, notification of illness, protective garment policy, and others. This practice is validated by the SQFP and alternate through daily observations during packing. GMP training effectiveness is done through quizzes or direct observations. Annual refreshers are provided at the beginning of the year using several program procedures. Verification during the audit through interviews with the production lead during the packing of rainier cherries (Zillah) and packing of Gala (Yakima). Infrastructure of the facility is sound with good seals on doors and windows.

2.4.3 - Food Safety Plan (Mandatory)

2.4.3.1 - A HACCP-based referenced food safety plan, developed by a responsible authority, shall be implemented in the absence of a specifically developed food safety plan for the site. The site shall: i. Maintain current records indicating that the food safety plan has been reviewed and its scope of hazard analysis, risk assessments, and control measures, such as Good Agricultural or Operational Practices, cover all products produced and sold by the site and are within the scope of certification; and ii. Document when changes in the food safety plan have impacted their Good Agricultural or Operational Practices. Note: Sites shall choose either 2.4.3.1 or 2.4.3.2 with the subsequent 2.4.3 requirements as the mandatory element.

Response: Compliant

2.4.3.2 - Where a site has developed its own food safety plan, either by choice or due to product(s) not included within the scope of a HACCP-based model as per 2.4.3.1, it shall be implemented and maintained and outline how the organization controls and assures food safety of the products or product groups and their associated processes that are included in the scope of the SQF certification. More than one HACCP food safety plan may be required to cover all products included in the scope of certification.

Response: Compliant

2.4.3.3 - The food safety plan(s) shall be developed and maintained by a team that includes the SQF practitioner and those site personnel with agricultural, technical, and/or machinery knowledge relevant to the commodities and products. Where the relevant expertise is not available on-site, advice may be obtained from other sources to assist the food safety team.

Response: Compliant

2.4.3.4 - The scope of each food safety plan shall be developed and documented including the start and endpoints of the processes under consideration and all relevant inputs and outputs.

Response: Compliant

2.4.3.5 - Product descriptions shall be developed and documented for all products included in the scope of the food safety plans. These shall reference and/or include: i. The finished product specifications; ii. Information relevant to product safety, such as it is ready-to-eat, requires further processing, and/or storage conditions; and iii. The intended use of each product, which includes target consumer groups, the potential for consumption by vulnerable groups of the population, requirements for further processing if applicable, and potential alternative use of the product.

Response: Compliant

2.4.3.6 - The food safety team shall develop and document a flow diagram covering the scope of each food safety plan. The flow diagram shall include every step in the process of primary production, all agricultural inputs, packaging material, service inputs (e.g., water, steam, gasses as appropriate), process delays, and all process outputs, including feed, waste, and rework. Each flow diagram shall be confirmed by the food safety team to cover all stages and hours of operation.

Response: Compliant

2.4.3.7 - The food safety team shall identify and document all food safety hazards that can reasonably be expected to occur at each step in the processes, including agricultural inputs.

Response: Compliant

2.4.3.8 - The food safety team shall conduct a hazard analysis for every identified hazard to determine which hazards are significant, i.e., their elimination or reduction to an acceptable level is necessary to control food safety. The methodology for determining hazard significance shall be documented and used consistently to assess all potential hazards.

Response: Compliant

2.4.3.9 - The food safety team shall determine and document the control measures that must be applied to all significant hazards. More than one control measure may be required to control an identified hazard, and more than one significant hazard may be controlled by a specific control measure.

Response: Compliant

2.4.3.10 - Based on the results of the hazard analysis (refer to 2.4.3.8), the food safety team shall identify the steps in the process where control must be applied to eliminate a significant hazard or reduce it to an acceptable level (a critical control point or CCP). In instances where a significant hazard has been identified at a step in the process, but no control measure exists, the food safety team shall modify the process to include an appropriate control measure.

Response: Compliant

2.4.3.11 - For each identified CCP, the food safety team shall identify and document the critical limits that separate safe from unsafe product. The food safety team shall validate all of the critical limits to ensure the level of control of the identified food safety hazard(s) and that all critical limits and control measures, individually or in combination, effectively provide the level of control required (refer to 2.5.2.1).

Response: Compliant

2.4.3.12 - The food safety team shall develop and document procedures to monitor CCPs to ensure they remain within the established limits (refer to 2.4.3.11). Monitoring procedures shall identify the personnel assigned to conduct testing, the sampling and test methods, and the test frequency.

Response: Compliant

2.4.3.13 - The food safety team shall develop and document deviation procedures that identify the disposition of affected product when monitoring indicates a loss of control at a CCP. The procedures shall also prescribe actions to correct the process step to prevent recurrence of the safety failure.

Response: Compliant

2.4.3.14 - The documented and approved food safety plan(s) shall be implemented in full. The effective implementation shall be monitored by the food safety team, and a full review of the documented and implemented plans shall be conducted at least annually, or when changes to the process, equipment, inputs, or other changes affecting product safety occur.

Response: Compliant

2.4.3.15 - Procedures shall be in place to verify that critical control points are effectively monitored and appropriate corrective actions are applied. Implemented food safety plans shall be verified as part of SQF System verification (refer to 2.5).

Response: Compliant

2.4.3.16 - Critical control point monitoring, corrective action, and verification records shall be maintained and appropriately used.

Response: Compliant

2.4.3.17 - Where food safety regulations in the country of production and destination (if known) prescribe a food safety control methodology other than the Codex Alimentarius Commission HACCP guidelines, the food safety team shall implement food safety plans that meet both Codex and food regulatory requirements.

Response: Compliant

Summary -

Response: The cross-functional team includes members from the Production, Maintenance, Refrigeration, , Shipping/Receiving, Food Safety, and Sales. The SQFP serves as the HACCP Coordinator. All members have taken external HACCP certification courses (2019 - 2026). The HACCP team includes representatives from the Zillah & Yakima locations. The scope of the HACCP plan includes apples, cherries, and pears. There is one plan that covers these commodities. None of the fruits are cut and can be packed in trays, bags, or boxes. The product description (PZ-03-07) for dark and rainier cherries (packed in Zillah) includes the product name, method of preservation (cold storage or modified atmosphere), packaging includes lined cartons, polyethylene liners, boxes and corrugates as outer packaging. Storage conditions are described as maintaining in 28 - 33 degF in a closed room, distribution method is by refrigerated trucks, shelf life (up to 2 months). The product is considered ready-to-eat and is intended for the general public. There is no special labeling instruction or

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preparation. Apples and pears have similar information. Product descriptions were updated 1/9/26. The flow diagram identifies process steps from the receipt of commodities to shipping. It was verified by the HACCP team on 3/2/26. Steps inherent in the packing process include receiving of commodities, washing with fungicides or other chemical (depending on the commodity), cold storage or modified atmosphere storage, removal from storage and washing in a dump tank and spray bars containing sanitized water, pre-sorting to remove decayed or other imperfect products, waxing, drying tunnel, sorting, sizing and grading, and packed in customer requested packaging. There are no CCPs but control points are monitored such as hourly measurement of PAA or hypochlorite using ORP and test strips, modified atmospheres are continuously monitored for oxygen and carbon dioxide (reviewed records for Costco cherries packing load 386, lot J0520, cosmic crisp - oxygen @ 2%, CO2 @ 0.5%, honeycrisp - oxygen @ 3%, CO2 @0.9%), fumigant used is methyl bromide for products that are exported to different countries such as Vietnam, China, Thailand; (reviewed USDA chamber record from rooms B23 to B30 for honeycrisp). The hazard analysis worksheet is completed for cherries, apples, and pears. The worksheet includes potential hazards identified as biological, chemical, and physical. Biological hazards may include pathogens such as Listeria, E. coli, Salmonella. Controls include obtaining apples from approved suppliers that are GFSI certified and from company-controlled farms, storing products in temperature controlled rooms to minimize formation of mold, controls in harvesting such as no dropped products, dedicated and cleaned harvest bags, and GAP practices. Chemical hazards may include residues from pesticide applications, or accidental spills from lubricants. Chemical residues are controlled by regular testing (MRL) at accredited labs and by using certified pesticide applicators. Physical hazards are primarily foreign materials such as leaves, stones, stems, hard plastic and others. This is controlled by washing in dump tanks, chilled flumes and visual inspection during and after harvesting, during shipping and receiving, and during packing. A procedure for foreign material contamination control is established and followed. There are deviation procedures for control points that include either performing a duplicate monitoring or hold the implicated lot for further investigation. Investigations may involve following the CAPA process. Country regulations for the exporting countries was verified available, mostly for the fumigant processes required by the customer. The HACCP program is developed using the 12 principles of Codex, which includes similar FSMA principles. The program was reviewed and updated/approved by the team on 3/2/26 and is fully implemented.

2.4.4 - Product Sampling, Inspection and Analysis

2.4.4.1 - The sampling, inspecting, and/or analyzing of agricultural inputs and finished product shall be documented and implemented. The procedures applied shall ensure: i. Inspections and analyses are completed at regular intervals as required and to agreed specifications (e.g., MRLs, purity, strength, composition as per 2.3.2) and regulatory and labeling requirements; ii. Records of all inspections and analyses are maintained; and iii. All analyses are conducted to nationally recognized methods or alternative methods which are validated as equivalent to the nationally recognized methods. Where external laboratories are used to conduct input or product analyses, the laboratories shall be accredited to ISO 17025 or an equivalent national standard, licensed or recognized by a regulatory authority if required, and shall be included on the site's contract service specifications register (refer to 2.3.2.1). Where internal laboratories are used to conduct input or product analyses, sampling and testing methods shall be used in accordance with the applicable requirements of ISO/IEC 17025 or an equivalent national standard, including annual proficiency testing for personnel conducting analyses.

Response: Compliant

2.4.4.2 - On-site laboratories conducting chemical and microbiological analyses that may pose a risk to product safety shall ensure the following: i. Be located separate from any food handling or packaging activity and designed to limit access only to authorized personnel; ii. Provisions shall be made to isolate and contain all laboratory waste

and to manage laboratory waste separately from food waste; iii. Laboratory wastewater outlets shall at a minimum be downstream of drains that service food processing and handling areas; and iv. Signage is displayed that identifies the laboratory area as a restricted area, accessible only by authorized personnel.

Response: N/A

Evidence: • There is no onsite lab

Summary -

Response: The product sampling, inspection and analysis program is documented in FZ-04-01, (1/9/26). The testing program includes the daily QC tests conducted on product receipt (such as pressure, brix, physical inspections for inconsistencies based on customer specs, organoleptic tests), sizing before packing, annual and monthly water testing program, which includes annual water tests for potability, hourly monitoring of the hydro-cooler (temperature and sanitizer), weekly and monthly EMP, including start-up EMP for Zillah, which involves an extensive facility wide swabbing before packing, daily ATP (cleaning effectiveness), MRLs for exports as needed, MRL tests (for exports as required). Inspections start from daily pre-op inspections, daily and monthly GMP inspections, daily first-aid inspections, inspections at receipt, during packing, the use of vision systems during sizing and grading, product inspections at shipping. These are documented in the applicable inspection logs. External testing is performed in ISO 17025 accredited laboratories, Eurofins (water), IEH (swabs), Matrix Pacific Ag (country MRLs), spray records for the company fields. Accreditations - IEH (#AT-1678, EXP. 6/2/28), Eurofins. There is no onsite lab.

2.4.5 - Non-conforming Agricultural Inputs and Products

2.4.5.1 - The methods and responsibility for how to control non-conforming products, agricultural inputs, and packaging shall be documented and implemented. The procedures shall ensure: i. Items are quarantined (held), identified, handled, re-worked, and/or disposed of in a manner that minimizes the risk of inadvertent use, improper use, or risk to the integrity of finished product; ii. All relevant personnel are aware of the site's hold and release instructions and approvals; and iii. Records of non-conforming product holds, release, and dispositions are maintained.

Response: Compliant

Summary -

Response: SOP Non-conforming Product Control (P-03-57, 1/2/26). Non-conforming (NCF) product or material may include products, chemicals, equipment, packaging, and other applicable materials used for the packing or processing of products. NCF materials does not include material that is reworked or incorrect order picking. NCF product may be set aside because it does not meet one customer's specifications but can be packed for another customer. All NCF are quarantined in a dedicated location with applicable documentation identifying the material, reason for being NCF and possible disposition. A CAPA form (F-03-03) is recorded for each NCF material/product. NCF materials are reviewed by the Sales team to see if these can be utilized in another capacity. Only product that met company's requirements can be handled by this alternate method. Such products, when approved are labeled "HOLD FOR REPACK" with a visual sign. The FSQA team is responsible for confirming that all products that do not meet company's fruit requirements are disposed in the applicable manner. Currently, there are no products or materials on hold for non-conformance.

2.4.6 - Product Rework

2.4.6.1 - The responsibility and methods outlining how harvested or packaged product or packaging are reworked

shall be documented and implemented. The methods applied shall ensure: i. Reworking operations are supervised by qualified personnel; ii. Reworked product is clearly identified and traceable; iii. Each batch/lot of reworked product is inspected or analyzed as required before release; iv. Inspections and analyses conform to the requirements outlined in element 2.4.4.1; and v. Records of all reworking operations are maintained.

Response: Compliant

Summary -

Response: SOP Non-conforming Product Control (1/2/26). Product rework is handled under this topic. Materials are reworked or repacked according to customer specifications. Products that do not meet company product requirements are not reworked or repacked. Reworked products are those that are utilized in the current packing process and are in the same lot. Repacked products are those that are segregated because they may not meet one customer's requirements, but may be compliant to another customer's specifications. The Sales team are notified about such products and they are held to be repacked for another customer. Repacked products are identified in the inventory system for traceability purposes. Lot numbers are not mixed, each lot is handled as a discrete quantity. A repacked quantity may include different lots, which is identified as picked for the applicable customer in the inventory system. There is a separate area dedicated for repacked products; all products follow the same quality and safety guidelines. There were no repacked or reworked lot at the time of the audit. Records of repacked lots (Gala) were observed and traced by the Sales team during the audit.

2.4.7 - Product Release (Mandatory)

2.4.7.1 - The methods and responsibility for releasing finished products shall be documented and implemented. The methods applied shall ensure: i. The product is released by authorized personnel; ii. The product is released only after all inspections and analyses have been successfully completed, reviewed, and documented; and iii. The product meets regulatory and other established food safety controls. Records of all product releases shall be maintained.

Response: Compliant

Summary -

Response: SOP Product Release Policy, 1/2/26. Products are released for commercial purposes by Managers in the following departments - Shipping, Operations, or FSQA. Records reviewed before commercial release include - QC records, MRL results (if for export), shipping log, BOL (matches customer order), USDA chamber records (if exported), packaging inventory sheet (label verification), and correct pallet tags (by shipping personnel), truck inspection checklist prior to loading. The site does not use positive release. Final release check is done by the warehouse personnel during shipping to confirm that the right label is on the product, the sales order is correct, BB date is correct. The site does not use off-site or contract warehouses. Product release records were reviewed during the mock recall exercise. Shipping records are maintained by the Shipping department.

2.4.8 - Environmental Monitoring

2.4.8.1 - A risk-based environmental monitoring program shall be in place for all products grown indoors and packhouse operations and include all processes and immediate surrounding areas. The methods and responsibility for the environmental monitoring program shall be documented and implemented.

Response: Compliant

2.4.8.2 - An environmental sampling and testing schedule shall be prepared. It shall at a minimum: i. Detail the applicable pathogens or indicator organisms to test for in that industry; ii. List the number of samples to be taken and the frequency of sampling; iii. Outline the locations in which samples are to be taken and the rotation of locations as needed; and iv. Describe the methods to handle elevated or undesirable results.

Response: Compliant

2.4.8.3 - Environmental testing results shall be monitored, tracked, and trended, and preventative actions (refer to 2.5.3.1) implemented where unsatisfactory trends are observed.

Response: Compliant

Summary -

Response: The EMP is governed by two procedures, the Environmental Risk Assessment (1/2/26) and the Environmental Monitoring Plan (P-06-04, 1/2/26). Risk factors considered in the assessment include the RTE status of the fruits, they are RAC (raw agricultural commodities), prone to microorganisms that can be persistent (Listeria), contamination during harvesting, post-harvesting, and packing. The program also utilizes the HACCP hazard analysis as the basis for the selection of sample locations. The microorganisms tested are Listeria spp, Salmonella, and E. coli in zone 2 to 4 locations, and ATP in zone 1 surfaces. 100 sample locations are selected for each site (Yakima & Zillah). Yakima sites starts at 100 to 218. Examples of sample locations include 16L N. Dump Tank to Flume Leaf Eliminator, 6L Dryer Floor, 16L Dry Bin Filler Frame, 16L Trayline Outlets 44-51. Zillah sites starts at 501 to 576 for the Red Room (dark cherries), and 301 to 345 (Rainier Room). Examples of test locations include Second Flume Floor, Sizer Outlets North, Hydrocooler Frame, North Entry Way. The test plan and test locations are recorded in an Excel file showing the description of each location and the corresponding number. Ten (10) randomized samples are selected each month (at each location), and tested for the three microorganisms. Each test must be 'none detected'. ATP results for zone 1 surfaces must be at 10 RLUs or below. ATP is tested using the Hygenia ATP meter and swabs. Micro samples are sent to the Eurofins Cascade lab for analysis. The most recent sampling was done 6/1/26 at Yakima (Report TWA-502178) and 6/22/26 for Zillah (TWA-502779 Red, and TWA-502780 Rainier). All results were in compliance with program requirements. No negative trends was recognized by the site.

2.5.1 - Validation and Effectiveness (Mandatory)

2.5.1.1 - The methods, responsibility, and criteria for ensuring the effectiveness of all applicable elements of the SQF Program shall be documented and implemented. The methods applied shall ensure that: i. Good Agricultural/Operating Practices are confirmed to ensure they achieve the required results; ii. Critical food safety limits are reviewed annually and re-validated or justified by regulatory standards when changes occur; and iii. Changes to the processes or procedures are assessed to ensure the controls are still effective. Records of all validation activities shall be maintained.

Response: Compliant

Summary -

Response: Validation and verification of the SQF is governed by several policies, HACCP Control PointSummary, Validation Fruit at BPC (P-03-13, 1/2/26). The document describes the validation steps used for the review of the HACCP control points as a measure of effectiveness of the system. Control limits include ORP value in the dump tanks (650 mV @ pH 3.75 - 7.5). Monitoring is hourly and a review of the 2025 records show no anomalies or deviations. The second control point used is the ozone rain bath with limits of 1 to 3.5 ppm monitored hourly. 2025 records show no anomalies. The third is the PAA used in the spray bars, with control

limit of 20 - 80 ppm. 2025 records showed no deviation. All records were verified weekly. A similar operation is conducted for cherries using the document HACCP Control Point Summary, Validation for Cherries (PZ-03-13, 1/2/26). This involves measurement of chlorine at the dump tanks, control limits of 650 mV at pH 3.75 to 7.5. Monitoring is hourly for all measurements. 2025 season records showed no deviations. This system is also used for the hydrocooler (recorded in FZ-04-20), Monitoring is hourly, with 2025 seasonal records showing no deviations. Verification is done weekly by the SQFP or designee.

2.5.2 - Verification Activities (Mandatory)

2.5.2.1 - The methods, responsibility, and criteria for verifying monitoring of Good Agricultural/ Operating Practices, critical control points, other food safety controls, and the legality of certified products shall be documented and implemented. The methods applied shall ensure that personnel with responsibility for verifying monitoring activities authorize each verified record.

Response: Compliant

2.5.2.2 - A verification schedule outlining the verification activities, their frequency of completion, and the person responsible for each activity shall be prepared and implemented. Records of the verification of monitoring activities shall be maintained.

Response: Compliant

Summary -

Response: Verification follows the document, Verification of Records Policy (P-03-88, 5/4/26). The document provides the verification schedule showing the records reviewed, frequency of completion, and the responsible party. Examples include, daily (ATP SureTrend, GMP Checklists, Provision hourly water test BPC, MaintainX Daily Start Up), weekly (Sanitation Clean Break, Knife/Cutter Log), monthly (SQF & Safety Walk, MaintainX BPC Calibrations, Sprague Pest Control Report Review (both locations), quarterly (Ecology DMR WW Discharge, Glass-Hard Plastic Register), annual (ambient air test, scale calibrations, compressed air). For the purposes of system verification, the daily records are verified weekly, weekly are verified monthly, monthly reports are verified quarterly, annual reports are verified a week after completion.

2.5.3 - Corrective and Preventative Action (Mandatory)

2.5.3.1 - The methods and responsibility for outlining how corrective and preventative actions are determined, implemented, and verified shall be documented and implemented. The procedures shall include: i. The identification of the root cause, and ii. Resolution of non-compliances of critical food safety limits and deviations from food safety requirements that are deemed significant. Records of all investigation and resolution of non-conformities, including their corrections and preventative actions, shall be maintained.

Response: Compliant

Summary -

Response: SOP Corrective & Preventive Action Policy (1/2/26). The procedure "applies to significant problems (requiring corrective action) or potential problems (requiring preventive action) that affect quality at Borton & Sons including suppliers of production-related material or parts and nonconformance’s identified during internal audits." The SQFP has direct responsibility for the management of this program, with support from applicable teams such as Production. Company-wide CAPA is discussed at the monthly management review meeting. A deviation at a quality control or critical control point is analysed using the Risk Analysis Matrix

(P-03-21). Findings from internal or external audits must be recorded and processed as a CAPA. The SQFP reviews all findings or deviations and assign to the appropriate section. The three sections are, 1) Food Safety Contamination Evident (resolved ASAP), 2) Food Safety Contamination Possible (resolved ASAP), 3) deviations/findings from internal and external audits (within max 28 days), 4) general problems (30-90 days, exception is the purchase of equipment). All information is recorded in the CAPA form (F-03-03). There were 8 CAPAs in 2025 and to-date, 3 in 2026. Examples of CAPAs in 2025 include, unapproved cleaning utensil found on a FCS (3/19/25, closed), verification signatures missing on truck inspection logs (9/15/25). Examples in 2026 include, complaint with customer finding a bin corner in a bag of fruit (3/9/26, closed 3/12/26), Shipping Carrier Monitoring Log missing some information (4/6/26, closed 4/9/26). All 2025 CAPAs are closed.

2.5.4 - Internal Audits and Inspections (Mandatory)

2.5.4.1 - The methods and responsibility for scheduling and conducting internal audits to verify the effectiveness of the SQF System shall be documented and implemented. Internal audits shall be conducted in full and at least annually. The methods applied shall ensure: i. All applicable requirements of the SQF Food Safety Code: Primary Plant Production are audited per the SQF audit checklist or a similar tool, and objective evidence is recorded to verify compliance and/or non-compliance; ii. Corrective and preventative actions of deficiencies identified during the internal audits are undertaken (refer to 2.5.3); iii. Audit results are communicated to relevant management personnel and personnel responsible for implementing and verifying corrective and preventive actions; and iv. Changes implemented from the internal audit that have an impact on the site's ability to deliver safe food result in a review of applicable aspects of the SQF System (refer to 2.3.1.3). Records of internal audits and any corrections and corrective action taken as a result of internal audits are maintained.

Response: Compliant

2.5.4.2 - Personnel conducting internal audits shall be trained and competent in internal audit procedures. Where practical, personnel conducting internal audits shall be independent of the function being audited.

Response: Compliant

2.5.4.3 - Regular inspections during growing and harvesting of products, packing of products, plant production, and/or equipment used shall be planned and carried out to verify Good Agricultural/Operating Practices and building/equipment maintenance are compliant to the applicable SQF Food Safety Code. The site shall: i. Take corrections or corrective and preventative actions; and ii. Maintain records of inspections and any corrective actions taken.

Response: Compliant

Summary -

Response: SOP Internal Audits (P-04-09), 1/2/26. The internal audit program is used as the verification for the food safety plan. The SQFP is directly responsible for managing this program. The schedule is semi-annual and scheduled by the SQFP. Results are reported at management review meetings. Corrective action is assigned by the SQFP and must be initiated within 14 days of the non-conformance. All internal audits are done by an SQFP or other internal auditors. Internal auditors must, at a minimum, be HACCP trained, and may also undergo an external internal auditor training or SQF Implementation training. The audit is conducted using the SQF Ed. 9 checklist. Supporting evidence must be referenced. Non-conformances follow the CAPA process. The 2025 internal audits had zero findings (conducted by SQFP), and the 2026 had 5 findings (conducted by SQFP), mostly in module 10. None of the findings have significant impact on the food safety of the fruit (such as Doc Control, Record-Keeping). Findings are in CAPA and being investigated. A separate QA team conducts the

internal audit for growing and harvesting. A copy is shared with the packing house team.

2.6.1 - Product Identification (Mandatory)

2.6.1.1 - The methods and responsibilities for the product identification system shall be documented and implemented to ensure: i. Agricultural inputs, work-in-progress, and finished product are clearly identified during all stages of receipt, operations, storage, shipping, and transportation; ii. Finished product is labeled to the customer specification and/or regulatory requirements; and iii. Product identification records are maintained.

Response: Compliant

2.6.1.2 - The responsibility and methods used to trace product shall be documented and implemented to ensure: i. Finished product is traceable to the customer (one up) and provides traceability through the process to the agricultural input supplier and date of receipt of inputs, food contact packaging and materials, and other inputs (one back); ii. Traceability is maintained where product is reworked (refer to 2.4.3); and iii. The effectiveness of the product trace system is reviewed at least annually as part of the product recall and withdrawal review (refer to 2.6.2.1). Records for the receipt and use of agricultural inputs and packaging material and for finished product dispatch and destination are maintained.

Response: Compliant

Summary -

Response: Product identification is described in the Product Recall SOP. When received at the facility, fruits are identified by field and block and type plus a sequential number according to the inventory system. For example, Benton cherries received from Benson field, block#6, BEN09C, J4666; Benton cherries received from Benson field, block#7, BEN10C, J4667. Agricultural inputs such as fertilizers are identified by the lot or blend tickets, similarly for pesticides showing name and lot used in the preparation. Application records show the block sprayed by each chemical. Application records for each block are identified in the record including acreage, date sprayed and commodity sprayed. This information is linked to the field and variety when harvested. The trace system is reviewed at the same time as the mock recall. When received at the packing center, a product receiving summary report shows all commodities received by type, field and block, and units received of that lot. Records of trace tests were available for review and included in the trace exercise. Onsite trace challenge was completed on CostCo Benton Cherry supply shipped on 6/18/26. This order was received from Benson field block 6 identified as BEN09C J4666, 702 units were received between from this field. The other part of the order was received from Fish Hook field, block 4A, 2011 J004, 956 units received. Both fruits were packed on 6/18/26, with the fruit from Benson field with Pack ID 3-1240-6, and the fruits from Fish Hook field packed same day with Pack ID 3-1243-6. Pallet Tag ID for the Benson field started at 063104045 to 4098, and the fruit from Fish Hook had Pallet Tag ID 063104110 to 4114. Shipped to Costco Wholesale Morris, Morris IL, carrier is Ship Smart Solutions, product temp checked was 33 - 34 degF.

2.6.2 - Product Withdrawal and Recall (Mandatory)

2.6.2.1 - The methods and responsibility to withdraw or recall product shall be documented and implemented. The procedure shall: i. Identify those responsible for initiating, managing, and investigating a product withdrawal or recall; ii. Describe the procedures to be implemented by site management; iii. Outline a communication plan to inform customers, consumers, authorities, and other essential bodies in a timely manner appropriate to the nature of the incident; iv. Describe how the withdrawal and recall system is reviewed, tested, and verified least annually (mock recall); and v. Ensure that SQFI, the certification body, and the appropriate regulatory authority are listed as

essential organizations and are notified in instances of a food safety incident of a public nature or product recall. Records of all product withdrawals, recalls, and mock recalls shall be maintained.

Response: Compliant

2.6.2.2 - Investigation shall be undertaken to determine the cause of a withdrawal or recall, and details of investigations and any actions taken shall be documented and recorded.

Response: Compliant

2.6.2.3 - SQFI and the certification body shall be notified in writing within twenty-four (24) hours upon identification of a food safety event that requires public notification. SQFI shall be notified at foodsafetycrisis@sqfi.com.

Response: Compliant

Summary -

Response: Procedures include, Incident & Traceability & Recall, P06-02 (2/19/26). The procedure identifies the Recall team and member responsibilities, for example, the SQFP will determine the scope of the call, communication with regulatory agencies, SQFI and certification bodies, and determine root cause amongst other tasks. Contact information is updated periodically (at least quarterly, updated 6/2/26). The recall classification is described at the end of the hazard assessment. The incident documentation form lists the step-by-step activities and ownership. Mock recall was conducted on Cosmic Crisp apple received in the latter part of 2025 (June 2025). Product was harvested from Twohy field, block 1 & 2, J4281 (2,166 units received), and J4282 (2,435 units received). Received ID # 2319691 (32 units) from these will be traced to shipping. These were treated on 10/10/25 with Scholar Max/DPA. Pack date was 4/17/26 and shipped to Costco Wholesale on 4/23/26.

2.6.3 - Crisis Management Planning

2.6.3.1 - The methods and responsibility for execution of a crisis management plan shall be documented and implemented. The plan shall include: i. A list of known potential dangers (e.g., flood, drought, fire, tsunami, or other severe weather or regional events such as pandemic, warfare, or civil unrest) that can impact the site's ability to deliver safe food; ii. Designated site management responsible for decision making, oversight, communications, and management of the crisis management plan; and iii. Control measures to ensure any affected product is identified, isolated, and dispositioned appropriately.

Response: Compliant

2.6.3.2 - The crisis management plan shall be reviewed, tested, and verified at least annually with gaps and appropriate corrective actions documented. Records of reviews of the crisis management plan shall be maintained.

Response: Compliant

Summary -

Response: SOP Crisis Management Plan & Crisis Checklist (P-06-03, 3/19/26). The procedure provides guidance on crisis situations where food safety, quality, and legality are a significant issue. The team is the same as the recall team with the same contact information update requirement. Emergency contact information is updated at the same frequency. Team member responsibilities are the same. All crises are taken into consideration in the planned response/s. The challenge took place on 3/18/26 and the scenario was a collapse of the hill adjacent to the freeway with the road inaccessible. Products were not on the road at the time indicated. The SQFP sent out a notification to all crisis team members. The SQFP determined if there was an effect on the products currently being run in the facility or products were in transit at the time and could be contaminated

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due to emergency service actions. An inventory of the products to be shipped that day was obtained. The production team contacted a fleet backup in case needed. Utilities affected were defined and assessment made to determine if water coming to the site would be compromised. Production to be ready for summoning water tanks. Depending on the proximity to the site, there could be smoke, chemicals driven by wind (used by fire stations) to the facility. The Production and FSQA determine the disposition of products on the line. The team did not make a significant change to the plan.

2.7.1 - Food Defense Plan (Mandatory)

2.7.1.1 - A food defense threat assessment shall be conducted to identify potential threats caused by a deliberate act of sabotage or terrorist-like incident.

Response: Compliant

2.7.1.2 - A food defense plan shall be documented, implemented, and maintained based on the threat assessment (refer to 2.7.1.1). The food defense plan shall meet legislative requirements as applicable and shall include at a minimum: i. The methods, responsibility, and criteria for preventing food adulteration caused by a deliberate act of sabotage or terrorist-like incident; ii. The name of the senior site management person responsible for food defense; iii. The methods implemented to ensure only authorized personnel have access to production equipment and vehicles, manufacturing, and storage areas through designated access points; iv. The methods implemented to protect sensitive processing points from intentional adulteration; v. The measures taken to ensure the secure receipt and storage of raw materials, ingredients, packaging, equipment, and hazardous chemicals to protect them from deliberate acts of sabotage or terrorist-like incidents; vi. The measures implemented to ensure raw materials, ingredients, packaging (including labels), work-in-progress, process inputs, and finished products are held under secure storage and transportation conditions; and vii. The methods implemented to record and control access to the premises by personnel, contractors, and visitors.

Response: Compliant

2.7.1.3 - Instruction shall be provided to all relevant personnel on the effective implementation of the food defense plan (refer to 2.9.2.1).

Response: Compliant

2.7.1.4 - The food defense threat assessment and prevention plan shall be reviewed and tested at least annually or when the threat level as defined in the threat assessment changes. Records of reviews of the food defense plan shall be maintained.

Response: Compliant

Summary -

Response: SOP Food Defense & Food Fraud Plan & Crisis Checklist (P-06-03A, 3/20/26). The company considers a situation where the product is intentionally contaminated or adulterated by biological, chemical, physical, or radiological agents. The Crisis Management Team is the same as the recall team and has the same responsibilities. Other personnel are pulled in as needed. The contact info and emergency contact follows the same update arrangements. The annual challenge was based on reports of possible fraud on a certain variety (non-apple) sold to Walmart. The Crisis team and the Grower Accounting team was contacted to provide accurate quantity shipped to WM in 2026 (2345 cases). An exit inventory was done to determine that all required security doors were actively locked. Samples were taken from random cases and sent to an external lab for analysis. All non-red varieties were put on hold and not packed until further notice. The FSQA and Production determines the quantity that may be affected. An inventory of non-red varieties was done to

determine potential scope. A meeting of the crisis team was called to determine next steps and develop communication. All team members understood their roles and were able to implement as required. No significant changes was made to the food defense plan.

2.7.2 - Food Fraud (Mandatory)

2.7.2.1 - The methods, responsibility, and criteria for identifying the site's vulnerability to food fraud shall be documented, implemented, and maintained. The food fraud vulnerability assessment shall include the site's susceptibility to product substitution, mislabeling, dilution, and counterfeiting or stolen goods that may adversely impact food safety.

Response: Compliant

2.7.2.2 - A food fraud mitigation plan shall be developed and implemented, which specifies the methods by which the identified food fraud vulnerabilities shall be controlled and how the plan is communicated to relevant personnel to ensure effective implementation.

Response: Compliant

2.7.2.3 - The food fraud vulnerability assessment and mitigation plan shall be reviewed and verified at least annually with gaps and corrective actions documented. Records of reviews shall be maintained.

Response: Compliant

Summary -

Response: SOP Food Defense & Food Fraud Plan & Crisis Checklist (P-06-03A, 3/20/26). The food defense and food fraud risk assessments were conducted on 4/8/26. The food fraud risk assessment examined adulteration, tampering, mislabeling, substitution, and others. The company does not produce organic products that could be prone to counterfeiting. Controls used to prevent or avoid food fraud include product identification through the processing and packing. restricted access to sensitive areas, employee security cards, and others. The company considers a situation where the product is intentionally contaminated or adulterated by biological, chemical, physical, or radiological agents as a potential crisis. The Crisis Management Team is the same as the recall team and has the same responsibilities. Other personnel are pulled in as needed. The contact info and emergency contact follows the same update arrangements. The annual challenge was based on reports of possible fraud on a certain variety.(non-red apple) sold to Walmart. The Crisis team and the Grower Accounting team was contacted to provide accurate quantity shipped to WM in 2026 (2345 cases). An exit inventory was done to determine that all required security doors were actively locked. Samples were taken from random cases and sent to an external lab for analysis. All non-red varieties were put on hold and not packed until further notice. The FSQA and Production determines the quantity that may be affected. An inventory of non-red varieties was done to determine potential scope. A meeting of the crisis team was called to determine next steps and develop communication. All team members understood their roles and were able to implement as required. No significant changes was made to the food defense plan.

2.8.1 - Allergen Management (Mandatory)

2.8.1.1 - The methods and responsibility for the control of allergens and to prevent sources of allergens from contaminating product shall be documented and implemented. The allergen management program shall include: i. A hazard and risk analysis and control measures of those agricultural inputs and processing aids, including food grade lubricants, that contain food allergens (refer to food safety plan 2.4.3); ii. An assessment of

workplace-related food allergens that may originate from change rooms, vending machines, lunchrooms, and visitors; iii. A list of allergens that is applicable in the country of production and the country (ies) of destination if known; iv. A list of allergens that is accessible by relevant personnel; and v. Individual management plans for control of the identified allergens.

Response: Compliant

2.8.1.2 - Product labeling, in accordance with regulatory requirements, shall include allergens where risks from cross-contamination have been documented.

Response: Compliant

Evidence: • There is no product labeling.

Summary -

Response: The requirements for allergen management is written in the Borton Packing Allergen Statement. The company does not produce or pack allergens. Allergens can only enter the facility brought by personnel or vending machines. All employees are trained annually on this policy. Employees must wash hands prior to entering the packing areas. Vending machines are clearly labeled with the allergen/s it contains. Snacks are not allowed on the production/packing areas. Members of the Food Safety Compliance team conduct daily GMP inspections to confirm compliance. There is no product labeling because all products are fruits. Records reviewed: June.

2.9.1 - Training Requirements

2.9.1.1 - The responsibility for establishing and implementing the training needs of the organization's personnel to ensure they have the required competencies to carry out those functions affecting products, legality, and safety shall be defined and documented (refer to 2.1.1.6).

Response: Compliant

2.9.1.2 - Appropriate training shall be provided for personnel carrying out the tasks essential to the effective implementation of the SQF System and the maintenance of food safety and regulatory requirements.

Response: Compliant

Summary -

Response: The training matrix is documented in the 2026 General Yearly Required Training. This table shows the courses required per role and the month of training. For example, the Night Sanitation crew does its annual refresher on hygiene policies, product handling practices, and food safety culture in January, new employees are trained in June or as close to their orientation as possible. Maintenance trains on glove use in March and QA team is trained in February. All required topics are covered by June, except for new employees or other circumstances. Training is provided in classroom setting onsite and training effectiveness is by quizzes and direct observation.

2.9.2 - Training Program (Mandatory)

2.9.2.1 - A training program shall be documented and implemented. It shall outline the necessary competencies for specific duties and the training methods to be applied to relevant personnel upon initial hire and for ongoing refresher training. The training program shall include at a minimum: i. Appropriate HACCP training for personnel involved in developing and maintaining food safety plans; ii. Monitoring and corrective action procedures for all

personnel engaged in operating critical control points (CCPs); iii. Personal hygiene training for all personnel involved in the handling of food products and food contact surfaces; iv. Good Agricultural/Operating Practices for all personnel engaged in food handling operations; v. Allergen management, food defense and food fraud for all relevant on-site personnel; and vi. Identification and implementation of refresher training.

Response: Compliant

2.9.2.2 - Training materials, the delivery of training, and work instructions on all tasks critical to meeting regulatory compliance and the maintenance of food safety shall be provided in language(s) understood by personnel.

Response: Compliant

2.9.2.3 - Training records shall be maintained and include: i. Participant name; ii. Skills description; iii. Description of the training provided; iv. Date training completed; v. Trainer or training provider; and vi. Verification that the trainee is competent to complete the required tasks.

Response: Compliant

Summary -

Response: SOP Training Program (P-01-03, 1/2/26) describes the training program. It is the responsibility of Production Managers to ensure that all personnel under their jurisdiction are trained appropriately. The SQFP is responsible for the daily management of the program. The Training Skills Register F-01-01 (training matrix) is used by area supervisors/managers to identify courses needed for their area. The training record (F-01-02) is used to record attendance. GMP/Hygiene training understanding is done by regular GMP checks. The HACCP team is trained differently with more in-depth knowledge of the training. Training records reviewed include, Advanced HACCP (5/2-5/3/26), internal audit (5/16/24), Hygiene Policy Refresher (1/5/26). Training records had the requisite information such as training topic, participant name, completion date, trainer name, training effectiveness. Observations and interviews (5 operators) showed that the personnel are aware of their food safety responsibilities. No GMP non-compliance was observed.

10.1.1 - Premise Exterior

10.1.1.1 - The location and construction of the premises and building shall ensure that: i. Adjacent and adjoining buildings, operations, and land use do not interfere with safe and hygienic operations; and ii. Relevant regulatory authority approval has been obtained and is on file.

Response: Compliant

10.1.1.2 - The methods and responsibilities applied to maintain a suitable exterior environment shall be documented and implemented. These include: i. Effective, periodic monitoring and/or inspection of the premises, the surrounding areas, storage facilities, machinery, and equipment; ii. Controls to ensure that the exterior is kept free of waste and/or accumulated debris to prevent the attraction of pests and vermin; iii. Paths, roadways, loading and unloading areas are adequately drained and maintained; and iv. Records of inspections and correction actions are maintained.

Response: Compliant

Summary -

Response: The Zillah facility assessment was conducted 1/6/26 and the Yakima facility risk assessments was conducted on 1/5/26. Assessments involved potential hazards from businesses, employees, building, and adjacent land. The assessment presented no significant risk and risks are low. Controls in place include building security, employee controlled access, scheduled deliveries and pick-ups, perimeter cameras. Site

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permit is renewed annually (Zillah: UBI 601115448, exp. 8/31/27). SOP Buildings. Quarterly and annual building inspections done by Maintenance. Inspections include windows, pest evidence, floors/cracks damage, dryer vents (unobstructed), floor drains, fire extinguishers, perimeter security, and others. Records checked June 2026. Daily pre-op inspection includes an inspection of the external areas, such as the waste receptacles. Adjacent land is both rural and industrial, several farms are in close proximity but with a safe buffer from the building. Onsite inspections showed no accumulation of water or waste, shipping/receiving areas were clean and adequately maintained. Records of inspections were maintained.

10.1.2 - Building Interior

10.1.2.1 - Floors shall be constructed of smooth, dense, impact-resistant material that can be effectively graded, drained, easily cleaned, and is impervious to liquid. Floors shall be suitably sloped toward the floor drains at gradients to allow the effective removal of all overflow or wastewater under normal working conditions. Where floor drainage is not possible, plumbed options or other control measures shall be in place to handle overflow or wastewater.

Response: Compliant

10.1.2.2 - Drains and waste/material trap systems shall be constructed and located so that they can be easily cleaned and not present a hazard to products.

Response: Compliant

10.1.2.3 - Walls, partitions, ceilings, and doors shall be of durable construction. Internal surfaces shall have even, smooth light-colored finishes, be impervious to liquids, and shall be kept clean (refer to 10.2.5). Wall-to-wall and wall-to-floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of food debris. Drop ceilings, where present, shall be constructed to enable monitoring for pest activity, facilitate cleaning, and provide access to utilities.

Response: Compliant

10.1.2.4 - Ducting, conduit, and pipes that convey products or services, such as steam or water, shall be designed and constructed to prevent the contamination of food, ingredients, and food contact surfaces and allow ease of cleaning (refer to 10.3.2).

Response: Compliant

10.1.2.5 - Adequate ventilation shall be provided in enclosed product handling and storage areas and meet commodity-specific regulations where applicable. All ventilation equipment and devices shall be adequately cleaned per the cleaning and sanitation program.

Response: Compliant

10.1.2.6 - Pipes carrying sanitary waste or wastewater that are located directly over product lines or storage areas shall be designed and constructed to prevent the contamination of food, materials, ingredients, and food contact surfaces, and shall allow ease of cleaning.

Response: Compliant

10.1.2.7 - Doors, hatches, and windows and their frames in food handling or storage areas shall be of a material and construction that meets the same functional requirements for internal walls and partitions. Doors and hatches shall be of solid construction, and windows shall be made of shatterproof glass or similar material.

Response: Compliant

10.1.2.8 - Stairs, catwalks, and platforms in food processing and handling areas shall be designed and constructed so they do not present a product-contamination risk and with no open grates directly above exposed food product surfaces. They shall be kept clean (refer to 10.3.2).

Response: Compliant

10.1.2.9 - The inspection/quality control area shall be provided with facilities that are suitable for examination and testing of the type of product being handled/packed (refer to 2.4.4 for internal lab requirements). The inspection area shall: i. Have easy access to handwashing facilities; ii. Have appropriate waste handling and removal; and iii. Be kept clean to prevent product contamination.

Response: Compliant

10.1.2.10 - Lighting and light fixtures in product handling areas, inspection stations, ingredient/ input and packaging storage areas, and all areas where the product is exposed shall be: i. Of appropriate intensity to enable personnel to carry out tasks efficiently and effectively; and ii. Shatterproof, manufactured with a shatterproof covering, or fitted with protective covers. Where fixtures cannot be recessed, including in warehouses, structures must be protected from accidental breakage, manufactured from cleanable materials, and addressed in the cleaning and sanitation program.

Response: Compliant

Summary -

Response: Building is concrete constructed. Walls are smooth with no holes. Wall to wall junctions were smooth. Doors and windows are made of hard plastic and metal. There was no drop ceiling. No stairs or catwalk was seen in processing areas. No evidence of accumulated water, pipes were segregated for potable water and wastewater All processing materials such as conveyors, are made of inert materials such as polypropylene plastics. Light intensity in the food processing and warehousing areas were adequate. Lights in the processing areas are LED shatterproof. This has its own covering. Inspection is carried out monthly during foreign material and glass inspections. Most recent was 6/15/26 with no failures observed. When glass breakage happens, the area is quarantined, PPE is used when clearing the debris. If the light is over a processing area, production is stopped and the food put on hold, line is cleaned and confirmed for production. There are two inspection areas in close proximity to the processing areas. Tables were made of stainless steel and easily cleaned. Areas have a central washing sink and there are covered trash receptacles. Tables are cleaned as part of the sanitation schedule. There is easy access to the sinks and washing areas. There was adequate ventilation observed during the production process. There is no positive air-pressure system. Ventilation equipment such as HVAC are serviced annually, located at the ceiling and not in production, storage and handling areas. HVAC vents do not blow directly unto the product in the main processing areas. Fans were noted clean and not located in processing areas, there are no exhaust fans or ventilation equipment indoors. Extractor fans and canopies are not used. Condensation was not observed during the walk-through and during processing. Ventilation equipment is piped through the roof and not indoors.

10.1.3 - Dust, Insect, and Pest Proofing

10.1.3.1 - All external windows, ventilation openings, doors, and other openings shall be effectively sealed when closed and proofed against dust, vermin, and other pests. External personnel access doors shall be provided. They shall be effectively insect-proofed and fitted with a self-closing device and proper seals to protect against ingress of dust, vermin, and other pests.

Response: Compliant

10.1.3.2 - External doors, including overhead dock doors in food handling areas used for product, pedestrian, or truck access, shall be designed and maintained to prevent pest entry by at least one or a combination of the following methods: i. A self-closing device; ii. An effective air curtain; iii. A pest-proof screen; iv. A pest-proof annex; and v. Adequate sealing around trucks in docking areas.

Response: Compliant

10.1.3.3 - Electric insect control devices, pheromone, or other traps and baits shall be located and operated so they do not present a contamination risk to the product, packaging, containers, or operating equipment. Poison rodenticide bait shall not be used inside packing rooms, product storage areas, or food handling areas.

Response: Compliant

Summary -

Response: Pest proofing covers several buildings at the site. These include shipping/warehouse, storage rooms, packing shed, and offices. External windows and doors were well sealed. Doors do not open into the processing areas and are self-closing. Bait stations for pests were not observed in the processing areas. Accumulation of dust was not observed. Entrance doors were adequately pest-proofed. There are 3 ILTs within the processing areas.. Dock doors were properly sealed with no gaps noted. All other entrances/exits were observed always closed during the time of the audit. There were 3 ILTs observed in the packing shed. Traps are located in the interior of buildings.

10.2.1 - Equipment and Utensils

10.2.1.1 - The methods and responsibility for purchasing and specifications development for equipment and utensils shall be documented and implemented. The methods shall ensure that equipment and utensils: i. Are designed, constructed, installed, and operated so as not to pose a threat to products; and ii. Meet any applicable regulatory requirements.

Response: Compliant

10.2.1.2 - Product contact surfaces and those surfaces not in direct contact with product in product handling areas, raw material storage, packaging material storage, and cold storage areas shall be constructed of materials that will not contribute to a food safety risk.

Response: Compliant

10.2.1.3 - Benches, tables, conveyors, shellers, graders, packers, and other mechanical equipment shall be hygienically designed and located for appropriate cleaning. Equipment surfaces shall be smooth, impervious, and free from cracks or crevices.

Response: Compliant

10.2.1.4 - Product containers, tubs, and bins used for edible and inedible material shall be constructed of materials that are non-toxic, smooth, impervious, and readily cleaned per the cleaning and sanitation program. Bins used for inedible material shall be clearly identified.

Response: Compliant

10.2.1.5 - All equipment and utensils shall be cleaned after use and be stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination.

Response: Compliant

10.2.1.6 - Vehicles and/or other devices used to transport and move products in food contact, handling, or processing zones, or cold storage rooms shall be designed and operated so as not to present a food safety hazard.

Response: Compliant

Summary -

Response: Equipment specifications is a combination of manufacturer's recommendations, Food Safety, Maintenance and Operations. Purchasing process is initiated and approved by the management team, which includes the HACCP team. The request is discussed during management review meetings and requirements and specifications highlighted. Specifications are developed by the operations team for the specific purpose. Sanitary design are included such as no sharp corners, made of inert material such as SS, no niches or voids, corners are well sealed. Forklifts are electric and pose no contamination risks to product. All equipment and production lines are included in the sanitation program, and was verified through the review of the sanitation schedule. Vehicles have the same sanitary inspections as customer or company trucks. No non-conforming equipment or materials were noted during the audit, there is a dedicated area (away from processing) that can be used for equipment or materials on hold Product containers were either stainless steel or hard plastic. Trash bins were clearly labeled and of a specific red or grey color. Product contact surfaces are stainless steel (316) and were observed with no cracks or crevices.

10.2.2 - Equipment Maintenance and Repair

10.2.2.1 - The methods and responsibility for the maintenance and repair of equipment and buildings and facilities shall be documented, planned, and implemented in a manner that minimizes the risk of product, packaging, or equipment contamination. The methods shall include procedures to ensure: i. Routine preventive maintenance of facilities and equipment in any food handling or storage area is performed according to a maintenance control schedule; ii. Preventive maintenance and repair of items identified as impacting food safety controls and practices are prioritized for completion according to defined schedules or immediately when they are not properly functioning; and iii. Records are maintained for all preventive maintenance and equipment failure/immediate repair activities and corrective actions. The maintenance schedule shall cover buildings, equipment, and other areas of the premises critical to the maintenance of product safety and quality.

Response: Compliant

10.2.2.2 - The maintenance supervisor and/or site supervisor shall be informed when repairs or maintenance are undertaken in product handling or storage areas and when the activities pose a potential threat to product safety (e.g., pieces of electrical wire, damaged light fittings, and loose overhead fittings). When possible, maintenance is to be conducted outside operating times.

Response: Compliant

10.2.2.3 - Temporary repairs, where required, shall not pose a food safety risk, and shall be included in the cleaning program and/or routine inspections. There shall be a plan in place to address the completion of temporary repairs to ensure they do not become permanent solutions.

Response: Compliant

10.2.2.4 - Equipment located over product or product conveyors shall be lubricated with food-grade lubricants, and their use shall be controlled to minimize the contamination of the product.

Response: Compliant

10.2.2.5 - Paint used in a food handling or contact zone shall be suitable for use, in good condition, and shall not be

used on any product contact surface.

Response: N/A

Evidence: • Paint is not stored at the Zillah plant.

10.2.2.6 - Compressed air systems, and systems used to store or dispense other gases used in the operational process that come into contact with food or food contact surfaces, shall be maintained and regularly monitored for quality and applicable food safety hazards.

Response: Compliant

Summary -

Response: SOP Equipment Purchasing, Locating & Preventive Maintenance, P-03-48, 1/5/26). The SQFP is responsible for assuring that all eqyipment and repairs are done according to SQF requirements. Borton uses a software application (MaintainX) to create and document all activities. Scheduled preventive maintaince of equipment is loaded into this application. Maintenance PMs are created in the work order section of the application and include due dates, completion dates and responsible party. Requests for repairs are documented in the Request for Repair & Clean-Up Log (F-03-22). These are designated as temporary repairs and are logged into the application. Maintenance personnel have been trained to clean up after repair work is complated. The Maintenance & Sanitation Sign-Off Log is used as a record confirming that sanitation is complete and the equipment is ready for use. Record reviewed was the BPC Line Maintenance of 4/23/26. The work order (in MaintainX) shows that it is high priority, shows who is assigned to this work, location, and asset. The application records the due date and the completion date. The line start-up/Pre-Op check for the same day was reviewed and showed the appropriate sign off and verifications. The time stamp record showed that the work was assigned to AP on 4/22/26 @ 6:34 am, work started on 4/23 at 11:10 am by AP, and was completed at 11:20 am, with work order closed out. The Manager sign off was done on the same day at 11:15 am. Paint is not stored at the Zillah plant.

10.2.3 - Maintenance Personnel and Contractors

10.2.3.1 - Maintenance personnel and contractors shall comply with the site's personnel and operational hygiene requirements (refer to 10.5).

Response: Compliant

10.2.3.2 - All maintenance and other engineering contractors required to work on-site shall be trained in the site's food safety and hygiene procedures or shall be escorted at all times until their work is completed.

Response: Compliant

10.2.3.3 - Maintenance personnel and contractors shall remove all tools and debris from any maintenance activity once it has been completed and inform the area supervisor and maintenance supervisor so appropriate hygiene and sanitation can be conducted and a pre-operational inspection completed prior to the restarting of site operations. Maintenance, operations, and/or sanitation shall sign-off on communications.

Response: Compliant

Summary -

Response: No maintenance visitors were observed during the audit. All visitors and contractors read and sign a GMP acknowledgement prior to entering the facility. Visitors stay with the assigned host at all times. A sanitation inspection is conducted for equipment taken out of service and repaired. Daily pre-op verifies the

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activity. All equipment manufacturers are well known with relationships of more than 20 years. Contractors are always partnered with a technician.

10.2.4 - Calibration

10.2.4.1 - The methods and responsibility for calibration and re-calibration of measuring, testing, and inspection equipment used for monitoring activities outlined in Good Operating Practices, food safety plans, and other process controls or to demonstrate compliance with customer specifications shall be documented and implemented. The procedures shall ensure: i. Calibration is performed according to regulatory requirements and/or the equipment manufacturer's recommended schedule; ii. Calibrated measuring, testing, and inspection equipment is protected from damage and unauthorized adjustment; iii. Affected product is handled according to non-conforming product procedures when equipment is found to be out of calibration; iv. Software used for calibration activities is effective and appropriate; and v. Records of calibration activities are maintained.

Response: Compliant

10.2.4.2 - Equipment shall be calibrated against manufacturer, national or international reference standards and methods, or to an accuracy appropriate to its use. In cases where standards are not available, the site shall provide evidence to support the calibration reference method applied.

Response: Compliant

Summary -

Response: SOP Calibration Policy (P-04-88, 2/11/26) directs that all measuring instruments be calibrated on a periodic frequency as required by manufacturer recommendation. The SQFP is responsible for assuring that all instruments are calibrated at the applicable time. Each calibration is performed according to regulatory's requirements. The Calibration Schedule is a spreadsheet that contains all measuring instruments showing the instrument name, service provider, last calibration, and next due date. There are approximately 25 diffwerent instruments in the list. Examples include: Room Temp Probes, calibrated by WSDA, last calibration 7/16/25, due for calibration 7/16/26; BPC & BPZ Backflow, calibrated internally, next calibration date is 9/7 & 9/21/26; scales (all), calibrated by Mitchelli, next date is 5/5/27; Water Monitoring Systems, calibrated by US Syntex and done weekly; Sanitation Product Supply, calibrated by ChemStation, calibrated monthly, next date 7/30/26. Calibration certificates were reviewed for scales, probes, and verified to be calibrated by approved methodology and standards traceable to NIST. Instrument that is out of calibration is taken off service and follows the non-conforming equipment process. No intrument/equipment were listed as non-conforming at the time of the audit.

10.3.1 - Pest Prevention

10.3.1.1 - The methods and responsibility for pest prevention shall be documented and effectively implemented. The pest prevention program shall: i. Describe the methods and responsibility for the development, implementation, and maintenance of the pest prevention program; ii. Record pest sightings and trend the frequency of pest activity so as to target pesticide applications; iii. Outline the methods used to prevent pest problems; iv. Outline the pest elimination methods and the appropriate documentation for each inspection; v. Outline the frequency with which pest status is to be checked; vi. Include the identification, location, number, and type of bait stations set on a site map; vii. List the chemicals used. They are required to be approved by the relevant authority, and their Safety Data Sheets (SDS) made available; viii. Outline the methods used to make personnel aware of the bait control program and the measures to take when they come into contact with a bait

station; ix. Outline the requirements for personnel awareness and training in the use of pest and vermin control chemicals and baits; and x. Measure the effectiveness of the program to verify the elimination of applicable pests and to identify trends.

Response: Compliant

10.3.1.2 - Pest contractors and/or internal pest controllers shall: i. Be licensed and approved by the local relevant authority; ii. Use only trained and qualified operators, who comply with regulatory requirements; iii. Use only approved chemicals; iv. Maintain a site map indicating the location of bait stations, traps, and other applicable pest control/monitoring devices; and v. Report to a responsible authorized person on entering the premises and after the completion of inspections or treatments.

Response: Compliant

10.3.1.3 - Inspections for pest activity shall be conducted on a regular basis by trained personnel and the appropriate action taken if pests are present. Identified pest activity shall not present a risk of contamination to food products, raw materials, or packaging. Records of pest activity inspections and pest control devices shall be maintained.

Response: Compliant

10.3.1.4 - Food products, raw materials, or packaging that are found to be contaminated by pest activity shall be effectively disposed of, and the source of pest infestation shall be investigated and resolved. Records shall be kept of the disposal, investigation, and resolution.

Response: Compliant

10.3.1.5 - No domestic animals shall be permitted on the site in food handling or storage areas

Response: Compliant

Summary -

Response: The procedure for pest control is named the Pest Control Policy (P-03-53, 1/5/26). The service provider is Sprague. The provider inspects monthly for mice and fly control, and weekly for bird presence. The contract agreement was signed 1/5/26 including a list of services. The pest control program is managed by the SQFP or alternate. Several buildings are covered under the service, including the packing shed and adjacent rooms, the shipping areas, and the cooler rooms. There are 16 bait stations, 53 internal traps, 6 ILTs, 5 insect sticky traps (located at the break room) at the packing shed; the shipping areas have 14 bait stations, 49 internal traps; the cooler building contains 15 bait stations. All buildings were observed to be adequately protected. Reports reviewed for April and June (aligned with products selected for system verification). Most reports had signs of house flies and occasional mice, There were no structural concerns. Chemicals mostly used include Contrac All-Weather Bloc (EPA 12455-79) in the bait stations. Inspection of each device is documented using bar codes. Tech license, WA 96592, exp. 12/31/26; COI: MWZY311395-26, exp. 1/1/27. Exit meetings are held with the SQFP or designee. Annual pest control training is held in January of each year. SDS information were available on Sprague's website. Pesticides are not stored on site. There were no animals seen during the audit. No food products or materials were found to be contaminated by pest activity.

10.3.2 - Cleaning and Sanitation

10.3.2.1 - The methods and responsibility for cleaning of the product handling equipment and environment shall be documented and implemented. Cleaning procedures and schedules shall include: i. A list of equipment, utensils, and storage areas that require periodic cleaning; ii. Instructions on how cleaning is performed for the various

areas and equipment; iii. The frequency of when cleaning is to be completed; iv. Personnel responsible and the methods used to verify the effectiveness of the cleaning and sanitation program (e.g., validation of procedures, concentration of detergents and sanitizers); and v. Records of cleaning activities and effectiveness reviews/inspections are maintained.

Response: Compliant

10.3.2.2 - Detergents and sanitizers shall be suitable for use in a food handling environment, labeled according to regulatory requirements, and purchased in accordance with applicable legislation. The organization shall ensure: i. The site maintains a list of chemicals approved for use; ii. An inventory of all purchased and used chemicals is maintained; iii. Detergents and sanitizers are properly stored as per the storage program; iv. Safety Data Sheets (SDS) are provided for all detergents and sanitizers purchased; and v. Only trained personnel handle sanitizers and detergents.

Response: Compliant

10.3.2.3 - Detergents and sanitizers that are mixed for use shall be correctly mixed according to the manufacturer's instructions, stored in containers that are suitable for use, and clearly identified. Mix concentrations shall be verified, and records maintained.

Response: Compliant

10.3.2.4 - Suitably equipped areas shall be designated for cleaning product containers, knives, cutting boards, and other utensils. Racks and containers for storing cleaned utensils and protective clothing shall be clearly identified and maintained in a manner that prevents contamination of products, equipment, or storage areas.

Response: Compliant

10.3.2.5 - Pre-operational inspections shall be conducted following cleaning and sanitation operations to ensure food handling areas, product contact surfaces, equipment, personnel amenities, sanitary facilities, and other essential areas are clean before the start of operations. Pre-operational inspections shall be conducted by qualified personnel and records maintained.

Response: Compliant

10.3.2.6 - Staff amenities, sanitary facilities, and other essential areas shall be inspected by qualified personnel at a defined frequency to ensure the areas are clean.

Response: Compliant

10.3.2.7 - The responsibility and methods used to verify the effectiveness of the cleaning procedures shall be documented and implemented. A verification schedule shall be prepared. A record of pre-operational hygiene inspections, cleaning and sanitation activities, and verification activities shall be maintained.

Response: Compliant

Summary -

Response: "SOP Cleaning & Sanitation. The Master Sanitation Schedule shows the lists of equipment and areas with frequencies of daily and weekly only for both locations. At the Zillah location, the facility is given a start-up clean at the beginning of the season (season can be from 4 to 7 weeks only), Examples of areas, equipment and frequencies at the Yakima location include, nightly frequencies are 16L bin wash, North & South brush beds, 16L wet end drains, food contact surfaces A1 & B1, ROTO bin filler, North & South sorting tables. Each area has a corresponding SSOP with instructions on chemicals and concentrations, utensils, and cleaning actions. The Zillah location has a smaller number of areas and equipment such as baggers, belts,

elevators, conveyors, drains, dump tanks, sizers, FCS sorting areas. These are all nightly frequencies and have corresponding SSOP. Example: Zillah Red Line Chutes & Flumes, which describes the use of teh chemical Chlorine 30417, 5.6% PAA (~200 ppm), PPE, and cleaning utensils. akima example is the SSOP for Dump Tanks, which uses the same chemicals and concemtrations. All sanitation is documented in Provision daily and verified by the area supervisor. All chemicals are provided by ChemStation and are titrated weekly by the ChemStation technician to confirm concentrations. Verification of cleaning using ATP is documented in Provision. ATP tests range from 8 to 58 RLUs for the June 18 sanitation cycle. Target is 100 RLUs. In 2025, there were 25 failures out of ~4000 tests. 2025 showed 8 heat spots with consequent focus on these areas, 2026 has shown only 2 heat spots so far. Records reviewed: Sanitation & Pre-Op for June 18, BPC Night Sanitation & Pre-op April 26, ATP results for April ranged from 2 to 12 RLUs for the areas swabbed (Pass is <100 RLUs). Major deep cleaning is done monthly on the weekends. An inventory of chemicals is maintained by ChemStation and reviewed monthly by SQFP. Examples of chemicals supplied by ChemStation include Foaming Acid Cleaner 9590, Chlorinated Foam Cleaner Acid 30147, General Purpose Cleaner 5729. All chemicals are kept in a locked cage with restricted access, mainly sanitationby supervisors with verification weekly by SQFP. No knives or cutting utensils are used. Janitorial services are provided by a separate crew with daily logs of cleaning activities and areas. There is no CIP. Verifications of cleaning is done by production team in the daily pre-op prior to start-up. "

10.4.1 - Personnel Practices

10.4.1.1 - A documented and implemented procedure for personal hygiene and personnel practices shall ensure that personnel engaged in the handling of product use appropriate personal hygiene practices. The procedure shall include instructions that: i. Jewelry and other loose objects that pose a threat to the safety of the product are not worn or taken into any product handling or storage operations. ii. Fingernail polish, artificial nails, and long nails are not permitted where product is handled with bare hands; iii. False eyelashes and eyelash extensions are not permitted; iv. Hair restraints are used where product is exposed; and v. Smoking, chewing, eating, drinking (except for water which shall be available to all personnel), or spitting are not permitted in any packing or storage areas. Note: The wearing of plain bands with no stones or jewelry accepted for religious or cultural reasons and prescribed medical alert bracelets can be permitted; however, the site will need to consider its customer requirements and the applicable food legislation. Personnel and visitor practices, including all those listed in 10.4.1, shall be routinely monitored for compliance, and any resulting corrective actions implemented and recorded for personnel who violate food safety practices. Code Amendment #1 A medical screening procedure shall be in place for all employees, visitors and contractors who handle exposed product or food contact surfaces.

Response: Compliant

10.4.1.2 - Personnel who are known to be carriers of infectious diseases that present a health risk to others through the packing or storage processes shall not engage in packhouse operations.

Response: Compliant

10.4.1.3 - Procedures and responsibilities shall be in place that specify the handling of product and/or product contact surfaces that have been in contact with or exposed to blood or other bodily fluids.

Response: Compliant

10.4.1.4 - Personnel with exposed cuts, sores, or lesions shall not be engaged in handling product or product contact surfaces. Minor cuts or abrasions on exposed parts of the body shall be covered with a suitable waterproof and colored dressing.

Response: Compliant

Summary -

Response: "All workers are trained with hygiene annual refreshers that includes GMP practices (jewelry, nails, no open wounds, illnesses, bodily fluids, etc.). Daily pre-op hygiene inspections used as verification. Observations of workforce during walk-through did not show GMP non-compliance. Interviews with packaging personnel showed their understanding of this requirement. There were no personnel observed with open wounds or similar issues. Interviews with production lead verified that the workers understood the GMP and personal hygiene concept. "

10.4.2 - Sanitary Facilities and Handwashing

10.4.2.1 - Toilet and handwashing facilities shall be provided and designed, constructed, and located in a manner that minimizes the potential risk for product contamination. The following shall be considered: i. There shall be sufficient toilet facilities for the maximum number of personnel, and they shall be constructed so they can be easily cleaned and maintained; ii. Handwash basins with clean and potable water, hand soap, disposable towels or effective hand drying devices, waste bins, and a tank that captures used handwash water for disposal (if not connected to drains) shall be provided inside or adjacent to toilet facilities and in accessible locations throughout food handling areas as required; iii. Signage in appropriate languages shall be provided adjacent to handwash basins instructing personnel to wash their hands after each toilet visit; iv. Racks for protective clothing used by personnel and visitors shall be provided; and v. Toilet and wash stations shall be maintained in clean and sanitary conditions. Tools/equipment used for cleaning toilet rooms shall not be used to clean operational areas.

Response: Compliant

10.4.2.2 - Personnel shall have clean hands, and hands shall be washed by all personnel, contractors, and visitors: i. On entering food handling areas, and before putting on gloves; ii. After each visit to a toilet; iii. After using a handkerchief; iv. After smoking, eating, or drinking; and v. After handling wash down hoses, cleaning materials, dropped products, or contaminated material.

Response: Compliant

10.4.2.3 - Sanitary drainage shall not be connected to any other drains within the premises and shall be directed to a septic tank or a sewerage system as per regulations.

Response: Compliant

Summary -

Response: "All employees washed their hands at the beginning of the day and at breaks. GMP monitors monitors compliance to GMP rules. Potable water from the City of Yakima Water Authority is provided for handwashing. Handwashing sinks available at employee and visitor entrances. All amenities provided (soap, disposable towels, trash receptacles). A glove policy is in place, adherence to this policy was observed during the packing process. Bilingual sanitatry signage was observed in all restrooms and next to the sinks. Where PPE are used, racks are provided; disposables are put in the waste disposal. Review of the watewr management plan drawing showed clear separation of potable and wastewater. "

10.4.3 - Protective Clothing

10.4.3.1 - Protective clothing (e.g., uniforms and smocks) shall not pose a food safety threat or be a risk to product contamination. Protective clothing shall be: i. Manufactured from material that can be effectively maintained,

stored, and laundered after use or at a frequency that does not create risks of cross-contact with products. Excessively soiled uniforms shall be changed or replaced where they become a product contamination risk; and ii. Temporarily stored on racks, when personnel leave operating areas or use toilet facilities and the clothing can be easily removed (e.g., smocks and aprons).

Response: Compliant

10.4.3.2 - Where applicable, clothing (i.e., any outer garment), including footwear, shall be in good condition, cleaned, and worn to protect product from the risk of contamination.

Response: Compliant

10.4.3.3 - Disposable gloves and aprons shall be changed after each break, upon re-entry into the processing area, and when damaged. Non-disposable aprons and gloves shall be cleaned and sanitized as required and, when not in use, stored on racks provided in the processing area or designated sealed containers in personnel lockers and not on packaging, ingredients, product, or equipment.

Response: Compliant

Summary -

Response: The site does not use uniforms. There is a glove and disposable apron policy, observations during return from break showed that workers adhered to the policy by handwashing and using new gloves. An inspection of the personnel during processing showed no GMP non-compliance such as jewelry or loose objects, evidence of illness, and others. Disposable aprons are used for workers that are next to the fruit.

10.4.4 - Visitors

10.4.4.1 - All visitors, including management, shall be required to adhere to site personnel practices and specifically: i. Remove jewelry and other loose objects as per 10.4.1.1; ii. Wash hands as per 10.4.2.2; iii. Wear suitable clothing and footwear when entering any operational or food handling area; and iv. Enter and exit food handling areas through the proper entrance points.

Response: Compliant

10.4.4.2 - Visitors who are exhibiting visible signs of illness or have been in recent direct contact with other sites, animals, or produce shall be prohibited from entering any growing or product handling or harvesting operation.

Response: Compliant

Summary -

Response: All visitors sign a GMP acknowledgement prior to entering the facility. Document contains the GMP rules such as no loose articles, clean wear, no jewelry, no illnesses, and others. Visitors must wear clean clothing during visit. Visitors with visual signs of illness will not be allowed into the facility. All visitors enter the facility through a dedicated entrance. All visitors use accompanied by the host at all times. Visitors are not allowed into the bottling area, with the exception of maintenance contractors.

10.4.5 - Personnel Amenities (change rooms, toilets, lunchrooms/breakrooms)

10.4.5.1 - Staff facilities shall be supplied with appropriate lighting and ventilation and provided to enable staff and visitors to: i. Change into and out of protective clothing, if applicable; ii. Store street clothing, footwear, and personal items separate from food handling, packing, and storage areas.

Response: Compliant

10.4.5.2 - Separate lunchroom and/or breakroom facilities shall be provided away from product contact/handling zones. Lunchrooms/breakrooms shall be: i. Ventilated and well lit; ii. Provided with adequate tables and seating to accommodate the maximum number of personnel at one sitting; iii. Equipped with a sink serviced with hot and cold potable water for washing utensils; iv. Equipped with refrigeration and heating facilities, enabling personnel to store or heat food and prepare non-alcoholic beverages if required; and v. Kept clean and free from waste materials and pests.

Response: Compliant

10.4.5.3 - Where outside eating areas are provided, they should be kept clean and free from waste materials and maintained in a manner that minimizes the potential for the introduction of contamination, including pests, to the site.

Response: Compliant

Summary -

Response: Staff amenities observed to be adequate and includes break room, lockers, and restrooms. Break rooms were well-lit, and contain amenities such as microwaves, fridges, adequate seating area with tables and chairs. Handwashing sinks are provided with hot and cold water (verified during inspection). No outside seating areas observed. Toilet rooms do not have direct connection to processing areas. Rest rooms are adequate in number, have hot and cold water, disposable towels, trash receptacles. Cleaning of the areas is included in janitorial duties. Checked as part of daily hygiene inspections. Records: June 2026.

10.5.1 - Product Handling and Packaging Operations

10.5.1.1 - All personnel engaged in any food handling operations shall ensure that products and materials are handled and stored to prevent damage or product contamination. They shall comply with the following operational practices: i. No eating or tasting any product in the food handling/contact zone, except as noted in element 10.5.1.2; ii. Entry into operational areas is only through the personnel access doors; iii. All doors are kept closed. Doors are not open for extended periods when access is required for waste removal, or receiving and/or shipping of products, ingredients, or packaging. iv. Packaging, product, and ingredients are kept in appropriate containers as required and off the floor; v. Waste is contained in the bins identified for this purpose, removed from operational areas regularly, and not left to accumulate; and vi. All wash down and compressed air hoses are stored on hose racks after use and not left on the floor.

Response: Compliant

10.5.1.2 - In circumstances where it is necessary to undertake sensory evaluations in a food handling/contact zone, the site shall implement proper controls and procedures to ensure: i. Food safety is not compromised; ii. Sensory evaluations are conducted by authorized personnel only; iii. A high standard of personal hygiene is practiced by personnel conducting sensory evaluations; iv. Sensory evaluations are conducted in areas equipped for the purpose; and v. Equipment used for sensory evaluations is sanitized, maintained, and stored separately from operational equipment.

Response: Compliant

10.5.1.3 - The flow of personnel in food handling areas shall be managed so that the potential for contamination is minimized.

Response: Compliant

10.5.1.4 - Personnel practices and activities, including those listed in 10.5, shall be routinely monitored for compliance, and any resulting corrective actions implemented and recorded for personnel who violate food safety practices.

Response: Compliant

Summary -

Response: Employees have a dedicated entrance into the processing areas. Doors to the packing/processing rooms are well sealed. Observations during the walk-through showed personnel were clean during processing. Personnel working in processing areas do not go into other areas of the facility. A daily GMP & hygiene inspection is used for monitoring and verification. No products or hoses were observed on the floor. No eating or tasting was observed during processing. Sensory evaluations are not conducted.

10.5.2 - Control of Foreign Matter Contamination Operations

10.5.2.1 - The methods and responsibility for the prevention of foreign matter and glass contamination shall be documented and implemented. Procedures and resulting records shall ensure: i. Containers, equipment, and other utensils made of glass, porcelain, ceramics, brittle plastic, or similar materials are not permitted where exposed product is handled, unless clearly identified, required for effective operational controls, and regularly inspected; ii. Regular inspections are conducted to ensure food handling/contact zones areas are free of glass and brittle plastic and any items made from the previously identified materials are in good repair; iii. Wooden pallets and other wooden utensils or tools used in food handling/contact zones are dedicated for that purpose. Their condition is subject to regular inspection, and they are cleaned and maintained in good order; iv. Product handling areas are routinely inspected to remove risks from foreign material, such as debris, wood, stones, metal, detached/deteriorated equipment, and other physical hazards; and v. Personnel are to be made aware of their responsibility to adhere to the site's foreign matter and glass controls.

Response: Compliant

10.5.2.2 - Knives and cutting instruments used in product handling and packaging operations shall be controlled, kept clean, and well maintained. Snap-off blades shall not be used in manufacturing or storage areas.

Response: Compliant

10.5.2.3 - Gaskets and other equipment made of materials that can wear or deteriorate over time shall be inspected on a regular frequency (refer to 2.5.4.3).

Response: Compliant

Summary -

Response: SOP Foreign Materials. Control of foreign matter is through visual inspection at each process control point, receiving, cleaning, waxing, packing. Visual inspection is documented in the production record. There was no glass, porcelain, ceramics or brittle plastic observed in the packing areas; no wooden utensils are used. Glass inspection is conducted monthly (record checked June 2026, no glass observed). Knives or cutting instruments are not used. Visual inspection is conducted at several points during packing to remove debris, stems, and other materials, prior to packing. Shatter proof lights are used in the packing areas. Daily pre-op inspection is used for verification. Dedicated wooden pallets are used in the warehouse and at the case former. Wooden pallets observed were new. Knives or other cutting tools are not used in the packing areas. Pre-op inspections include an inspection for wear and tear along the packing line. Records: June production records.

10.5.3 - Detection of Foreign Objects Operations

10.5.3.1 - The responsibility, methods, and frequency for monitoring, maintaining, calibrating, and using screens, sieves, filters, or other technologies to remove or detect foreign matter shall be documented and implemented.

Response: N/A

Evidence: • The site does not use detection instruments.

10.5.3.2 - Metal detectors or other physical contaminant detection technologies shall be routinely monitored, validated, and verified for operational effectiveness. The equipment shall be designed to isolate defective product and indicate when it is rejected.

Response: N/A

Evidence: • The site does not use detection instruments.

10.5.3.3 - Records shall be maintained of the inspection of foreign object detection devices and any products rejected or removed by them. Records shall include any corrective and preventative actions resulting from the inspections.

Response: N/A

Evidence: • The site does not use detection instruments.

10.5.3.4 - In all cases of foreign matter contamination, the affected batch or item shall be isolated, inspected, reworked, or disposed of. Records shall be maintained of the disposition.

Response: Compliant

10.5.3.5 - In circumstances where glass or similar material breakage occurs, the affected area shall be isolated, cleaned, and thoroughly inspected (including cleaning equipment and footwear), and the completed actions approved by a suitably responsible person before restarting operations.

Response: Compliant

Summary -

Response: The site does not use detection instruments. Foreign matter contamination is handled through visual inspection at each process and packing control point. In the event of a breakage, the area is quarantined and cleaned using appropriate PPE. Cleaning and sanitation process is follwed and line is released by QA.

10.5.4 - Receiving and Shipping

10.5.4.1 - Personnel conducting receiving activities shall ensure agricultural inputs, packaging materials, and product are not contaminated during the unloading process. Work instructions and training shall include the following practices: i. Vehicles are clean, in good repair, suitable for the purpose, and free from odors or other conditions that may impact negatively on the agricultural input, packaging, or product; ii. Vehicles (e.g., trucks/vans/containers) are secured from tampering using a seal or other agreed-upon and acceptable device or system; iii. Unloading docks are designed to protect the product and in good operating condition (refer to 10.1.2.7); and iv. Where temperature control is required, the refrigeration unit's storage temperature settings and operating temperature are checked and recorded before opening the doors. Unloading is completed efficiently, and product temperatures are recorded at the start of unloading and at regular intervals during unloading. Recording documents for vehicle inspection, identification of approved suppliers, and temperature checks shall be maintained.

Response: Compliant

10.5.4.2 - Personnel conducting loading and transporting of harvested and/or packaged product shall ensure that product integrity is maintained. Work instructions and training shall include the following practices: i. Inspections for ensuring vehicles are clean, in good repair, suitable for the purpose, and free from odors or other conditions that may impact negatively on products; ii. Securing vehicles (e.g., trucks/vans/containers) from tampering using a seal or other agreed-upon and acceptable device or system; iii. Loading docks are designed to protect the product and in good operating condition (refer to 10.1.2.7); iv. Verification that appropriate storage conditions are maintained during transportation to final destinations; v. Prevention of cross-contamination with other hazards and potential spoilage; vi. Use of appropriate stock rotation practices; and vii. Recording and maintaining documents for vehicle inspection, transport conditions, and stock rotation.

Response: Compliant

Summary -

Response: SOP Fruit Program (FP4). The facilities work two shifts during the peak season at Zillah and all year at Yakima. Approximately 120 workers are at the Zillah plant during the season, approximately 480 at Yakima. All products are received from the company farms or from the assigned cold rooms. Trucks are inspected before products are received at any facility. In shipping, trucks are given appointments for collection of finished products (Cognos used for appointments). Inspection of all trucks are recorded in the Provision application. The sales group (Chelan Fresh) are responsible for making shipping appointments. After inspections, the product are scanned in (when receiving) or scanned out to confirm sales order. QC techs confirm that the specs are in compliance with the customer order. When applicable, truck temperatures are recorded on the truck inspection log. Information is documented in the N2N application used by shipping. Seal numbers are documented on N2N and on the BOL. Approximately 80 orders are received daily. Stock rotation: uses N2N as the tool for stock rotation through the inventory system. Physical inventory is done monthly and is matched with N2N.

10.6.1 - Water Supply

10.6.1.1 - A water supply plan shall be prepared that describes the water sources and the operational areas they serve and shall include the location of water sources, permanent fixtures, and the flow of the water system. The plan shall be kept current and revised when changes occur. Contingency plans shall be in place for instances when the potable water supply is deemed to be contaminated or otherwise inappropriate for use.

Response: Compliant

10.6.1.2 - Adequate supplies of potable water drawn from a known clean source shall be provided for use during operations, cleaning the premises and equipment, and handwashing.

Response: Compliant

10.6.1.3 - Supplies of hot and cold water shall be provided, as required, to enable the effective cleaning of the premises and equipment.

Response: Compliant

10.6.1.4 - The use of non-potable water shall be controlled so that: i. There is no cross-contamination between potable and non-potable water lines; ii. Non-potable water piping and outlets are clearly identified; iii. Hoses, taps, and other similar sources of possible contamination are designed to prevent backflow or back siphonage; and iv. Testing of the backflow system, where possible, is conducted at least annually and records are maintained.

Response: N/A

Evidence: • Non-potable water is not used.

10.6.1.5 - Where water is stored on-site, storage facilities shall be adequately designed, constructed, and routinely cleaned to prevent contamination.

Response: N/A

Evidence: • Water is not stored.

Summary -

Response: The operation uses city water for its potable needs as well as for operations. Water is supplied by the City of Zillah. There has been no history of shortage of water in the past 10 years, therefore no backup storage is considered. The 2024 Water Quality Report was issued and reviewed. City water is tested monthly, samples are taken at production, water sink and the hydrocooler. The most recent was on 5/13/26 and included tests for Total Coliform and E. coli. All results were in compliance with program requirements. Ice is not used. Non-potable water is not used. Check valves are used on all piping inside the facility.

10.6.2 - Water Treatment

10.6.2.1 - Water treatment methods, equipment, and materials if required, shall be designed, installed, and operated to ensure water receives effective treatment. Water treatment equipment shall be monitored regularly to ensure it remains serviceable.

Response: N/A

Evidence: • There is no water treatment>

10.6.2.2 - Water used as an aid to operations (e.g., fluming, final product spray) or for cleaning and sanitizing equipment, shall be tested and, if required, treated to maintain potability (refer to 10.6.2.1).

Response: N/A

Evidence: • There is no water treatment>

10.6.2.3 - Treated water shall be regularly monitored to ensure it meets the specified indicators. Water treatment chemical usage shall be monitored to ensure chemical residues are within acceptable limits. Records of testing results shall be kept.

Response: N/A

Evidence: • There is no water treatment>

Summary -

Response: NA. There is no water treatment.

10.6.3 - Water Quality

10.6.3.1 - Water shall comply with local, national, or internationally recognized potable water microbiological and quality standards, as required, when used for: i. Washing, thawing, and treating food; ii. Handwashing; iii. Conveying food; iv. An ingredient or operational aid; v. Cleaning food contact surfaces and equipment; vi. The manufacture of ice; or vii. The manufacture of steam that will come into contact with food or be used to heat water that will come into contact with food.

Response: Compliant

10.6.3.2 - Microbiological analysis of the water and ice supply shall be conducted to verify the cleanliness of the supply, the monitoring activities, and the effectiveness of the treatment measures implemented. Samples for analysis shall be taken at sources supplying water for the process, cleaning, or from within the site. The frequency of analysis shall be risk-based, and at a minimum annually.

Response: Compliant

10.6.3.3 - Water and ice shall be analyzed using reference standards and methods.

Response: Compliant

Summary -

Response: The operation uses city water for its potable needs as well as for operations. There has been no history of shortage of water in the past 10 years, therefore no backup storage is considered. The 2024 Water Quality Report was issued and reviewed. City water is tested monthly, samples are taken at production, water sink and the hydrocooler. The most recent was on 5/13/26 and included tests for Total Coliform and E. coli. All results were in compliance with program requirements. Ice is not used. Non-potable water is not used. Check valves are used on all piping inside the facility. Ice is not use

10.6.4 - Ice Supply

10.6.4.1 - Ice provided for use during operations, as a processing aid, or an ingredient shall comply with 10.5.3.1.

Response: N/A

Evidence: • Ice is not used.

10.6.4.2 - Ice that is purchased shall be from an approved supplier and included in the site's food safety risk assessment. Ice shall be supplied in containers that are appropriate for use, cleanable if reused, and be tested as appropriate (refer to 2.3.3).

Response: N/A

Evidence: • Ice is not used.

10.6.4.3 - Ice rooms and receptacles shall be constructed of materials as outlined in 10.1 and designed to minimize contamination of the ice during storage, retrieval, and distribution.

Response: N/A

Evidence: • Ice is not used.

Summary -

Response: NA. Ice is not used.

10.6.5 - Air and Other Gasses

10.6.5.1 - Compressed air or other gases (e.g., nitrogen or carbon dioxide) that contact food or food contact surfaces shall be clean and present no risk to food safety.

Response: Compliant

10.6.5.2 - Compressed air systems and systems used to store or dispense other gases used in the operational process that come into contact with food or food contact surfaces shall be maintained and regularly monitored for

quality and applicable food safety hazards. The frequency of analysis shall be risk-based and at a minimum annually.

Response: Compliant

10.6.5.3 - Ambient air shall be tested at least annually to confirm that it does not pose a risk to food safety.

Response: Compliant

Summary -

Response: Compressed air is the only delivered gas used on food contact surfaces, this is tested annually. Air is passed through 10-micron sized filters, with filters changed semi-annually. Ambient air is tested at the same frequency (annual). Samples were taken 4/10/26 and tested for APC at Eurofins. Samples results were at 1 cfu/L and 40 cfu/L respectively. Target is <100 cfu/100 ml. No other gases are used.

10.7.1 - Ambient/Dry Storage

10.7.1.1 - The responsibility and methods for ensuring proper storage of inputs, packaging, and finished product shall be documented and implemented. The methods shall ensure: i. Effective stock rotation; ii. Utilization of inputs, work-in-progress, and finished product within their shelf life; iii. Risks to temporarily stored materials and/or products are analyzed, and controls are applied if necessary; iv. Rooms used for the storage of product ingredients, packaging, and other dry goods are located away from wet areas (refer to 10.1.2); and v. Records are maintained to control storage and stock rotation.

Response: Compliant

10.7.1.2 - Dry ingredients and packaging shall be received and stored separately from field product or chilled materials to ensure there is no cross-contamination. Unprocessed field products shall be received and segregated to ensure there is no cross-contamination.

Response: Compliant

10.7.1.3 - Racks provided for the storage of packaging shall be constructed of impervious materials and designed to enable cleaning and inspection of the floors and areas behind the racks. Storage areas shall be cleaned at a predetermined frequency (refer to 10.2.5.1) and designed and constructed to prevent packaging from becoming a harborage for pests or vermin.

Response: Compliant

Summary -

Response: A dedicated section of the storage area is used for packaging materials. Ingredients are stored in a separate and dedicated location on the other side of the warehouse. Racks used for storing materials are made of sturdy blended aluminum and showed capability of storing the materials safely. Racks are cleaned monthly or as needed. Storage area is included in the sanitation area for monthly cleaning or as needed. Stock rotation is done using the N2N application, which automatically adjusts the inventory based on shelf life. All materials are on planned storage schedules, there are no temporary stored materials.

10.7.2 - Cold Storage, Controlled Atmosphere Storage, and Chilling of Foods

10.7.2.1 - The site shall provide confirmation of the effective operational performance of coolers, controlled atmosphere facilities, and cool rooms. They shall be designed and constructed to allow for the hygienic and efficient refrigeration and storage of food and be easily accessible for inspection and cleaning.

Response: Compliant

10.7.2.2 - Sufficient refrigeration and controlled atmosphere capacity shall be available to chill or store the maximum anticipated throughput of products with allowance for periodic cleaning of storage rooms.

Response: Compliant

10.7.2.3 - Discharge from defrost and condensate lines shall be controlled and discharged into the drainage system.

Response: Compliant

10.7.2.4 - Cool and controlled atmosphere rooms shall be fitted with temperature and atmosphere monitoring equipment and located to monitor the warmest part of the room and fitted with measurement devices that are easily read and accessible.

Response: Compliant

Summary -

Response: The two facilities together maintain approximately 120 cooler and controlled atmosphere storage rooms. Empire controls are used for the continuous monitoring of gas levels (oxygen and carbon dioxide) in the rooms. Temperature range 34 - 50 degF and 5% max oxygen. Currently about 12 rooms have product and are being continuously monitored, The selected product (used for system verification) was stored in room PK4, average temps for the day was at 34 - 38 degF, oxygen 2%, carbon dioxide 0.5%. Each room contains thermocouple probes at selected points that measure residual gases in the room. Empire controls records the discharge for each room and shows a real-time observation of the temperatures and gases in each room. This is connected to alarms and to the refrigeration manager's phone. There are approximately 70 cooler rooms in the Zillah facility. Maintenance of the units in each room is based on hours, approx. 300 hrs for the air compressors and 5000 hrs for the scrubbers. Discharge water from the units are piped into the septic tank for the site. Records: Real time temperature reviewed for room PK4 (Yakima) and room A4 (Zillah). The rooms are cleaned and sanitized when there are no products to be ready for the next batch of products.

10.8.1 - Storage of Hazardous Chemicals and Toxic Substances

10.8.1.1 - Hazardous chemicals and toxic substances with the potential for food contamination shall be stored so as not to present a hazard to personnel, product, packaging, product handling equipment, or areas in which product is handled, stored, or transported. Specifically, they shall not be stored inside food handling areas and product and packaging storage rooms.

Response: Compliant

10.8.1.2 - Daily supplies of chemicals used for continuous sanitizing of water, as a processing aid, or for emergency cleaning of food handling equipment and surfaces in food contact zones may be stored within or in close proximity to a food handling area, provided that access to the chemical storage facility is restricted to authorized personnel.

Response: Compliant

10.8.1.3 - Hazardous chemical and toxic substance storage facilities shall: i. Be compliant with national and local legislation and designed so there is no cross-contamination between chemicals; ii. Be adequately ventilated; iii. Be provided with appropriate signage indicating the area is a hazardous storage area; iv. Be secure and lockable to restrict access only to personnel with formal training in handling and use of hazardous chemicals and toxic substances; v. Have instructions, including up-to-date Safety Data Sheets (SDS), on the safe handling of hazardous

chemicals and toxic substances, readily accessible to personnel; vi. Be equipped with a detailed and up-to-date inventory of all chemicals contained in the storage facility; vii. Have suitable first aid equipment and protective clothing available close to the storage area; viii. In the event of a hazardous spill, be designed such that spillage and drainage from the area is contained; and ix. Be equipped with spillage kits and cleaning equipment.

Response: Compliant

10.8.1.4 - Hazardous chemical and toxic substances shall be handled and applied by properly trained personnel. These materials shall be used by, or under the direct supervision of, trained personnel with a thorough understanding of the hazards involved, including the potential for the contamination of food and food contact surfaces.

Response: Compliant

10.8.1.5 - The site shall dispose of unused chemicals and empty containers in accordance with regulatory requirements and ensure that: i. Empty chemical containers are not reused; ii. Empty containers are labeled, isolated, and securely stored while awaiting collection; and iii. Unused and obsolete chemicals are stored under secure conditions while awaiting authorized disposal by an approved vendor.

Response: Compliant

Summary -

Response: The facility stores sanitation chemicals (chlorite, PAA, detergent) in 5 gallon buckets and 55-gallon drums. Drums are kept in proximity to the sanitation chemical areas and are properly secured, The service provider, ChemStation is responsible for maintaining the inventory of each chemical used, conducting weekly titrations, and replacing empty drums with new ones. Drums are removed from the premises by ChemStation and are not stored. Other small quantities of chemicals are kept in a locked area containing the spill kit, PPE, eye wash station, first aid kit, and SDS binder.

10.9.1 - Waste Management

10.9.1.1 - The methods and responsibilities that describe the effective and efficient disposal of dry, wet, liquid, and solid waste, including inedible material, unusable packaging, and trademarked materials, from the premises shall be documented and implemented. Reviews of the effectiveness of waste management will be part of the site's daily inspections, and the results of these inspections shall be included in the relevant reports.

Response: Compliant

10.9.1.2 - Waste shall be regularly removed from food handling or processing areas so it does not create food safety risks for finished product and packing operations. Designated waste accumulation areas shall be maintained in a clean, tidy conditions until external waste collection occurs.

Response: Compliant

10.9.1.3 - Waste and overflow water from tubs, tanks, and other equipment shall be discharged directly to the floor drainage system and meet local regulatory requirements.

Response: Compliant

10.9.1.4 - Trolleys, vehicles waste disposal equipment, collection bins, and storage areas shall be maintained in a serviceable condition and cleaned and sanitized regularly so they do not attract pests and other vermin.

Response: Compliant

10.9.1.5 - Inedible waste designated for animal feed shall be stored and handled so it does not cause a risk to the animals or to further processing.

Response: Compliant

Summary -

Response: SOP Waste Disposal. The town utility is responsible for waste management and retrieves trash twice weekly or as often as needed. Waste is categorized as dry or household waste, and product waste (fruits). Product waste are retrieved for animal feed given to a farmer. Verification of the waste area is done during daily pre-op. Drainage system in the processing areas seem to be adequate. There was no accumulation of water observed during the walk-through. Waste receptacles are large enough to contain all waste and were observed covered. The location where waste is stored is more than 100 feet from the facility and poses no danger of cross - contamination. Trademarked materials are defaced or cut before disposal.
