



JOHN B. SANFILIPPO & SON, INC.

Food Safety & Quality Expectations Manual for Warehouses

JULY 2025

Warehouse Expectations

John B. Sanfilippo & Son, Inc. and its subsidiaries (collectively, “JBSS”) developed this Food Safety & Quality Expectations Manual for Warehouses (“Manual”) to communicate our expectations. For clarification, a “Warehouse” is defined as a company that stores, handles, or distributes direct contact packaging materials, ingredient, or finished products on behalf of JBSS to other JBSS locations, directly to customers, or directly to consumers. Warehouses handle only ingredients, materials, and/or finished products that are in sealed containers or packaging as well as no repacking of intact product is performed.

Compliance with the requirements of this Manual or with other specifications provided by JBSS does not relieve any Warehouse or any other party of its obligations or liabilities under any warranty, guaranty, contract, law, regulation, or otherwise.

Please read and understand the provisions of this Manual.

Below is a list of documents we require you to complete and return.

Your prompt action is appreciated.

1. Complete a Warehouse Affidavit for each non-JBSS facility;
2. Provide current third-party certified food safety audit certificate, substantially similar to a Global Food Safety Initiative (GFSI) audit;
3. Provide current third-party certified food safety audit report (Audit Summary, Rating Analysis Sheet, and Corrective Actions), substantially similar to a Global Food Safety Initiative (GFSI) audit; and
4. Provide a Food Safety Flow Diagram with your Preventive Controls;



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Section 1 - Introduction:

At John B. Sanfilippo & Son, Inc. (“JBSS”), we inspire trust by making safe food. The safety and quality of our products and that trust and confidence of our stakeholders are of the highest importance to us. We recognize that the safety of our products is the foundation on which the success of our business is built. Safe food is at the core of our heritage and is ingrained in our culture. One of the ways we achieve this is by ensuring the strength of our food safety and quality systems.

We expect that our warehouses will share this commitment and for that purpose we have developed the Food Safety & Quality Expectations Manual for Warehouses (“Manual”). The Manual is available at JBSS on our website at <https://jbssinc.com/food-safety/> or by contacting a JBSS Operations, Warehouse, or Quality Representative. The Manual outlined here is intended to help current and prospective new warehousing partners to ensure that their own food safety and quality systems meet JBSS and industry standards. These expectations have been developed based on best practices for warehouses in the food industry. All warehouse sites must be approved by JBSS before use. Approved warehouse locations receiving, storing and shipping materials/products for JBSS must meet the expectations in this Manual.

The Manual contains elements essential for the effective management of Food Safety, Quality, and Food Defense. These are JBSS requirements and are not intended to alter or eliminate any requirements that may be set in any contract, specification, or government regulation. Any questions about these standards should be addressed by contacting the appropriate JBSS Representative. By conducting business with JBSS, the warehousing vendor acknowledges its acceptance of these expectations and its intention to comply with these requirements.

This Manual is intended to provide all Warehouse partners with a basis for understanding the quality expectations of JBSS. This Manual is not an exhaustive listing of quality requirements. All commercially reasonable and industry-appropriate quality and safety protocols and procedures must be used in the production and supply of products, ingredients, materials, and services. Further, JBSS may provide additional or different quality or safety specifications to Warehouses from time to time, in JBSS’s sole discretion. Each program, document and record relating to food safety and quality as they relate to Warehouse products are to be made accessible to JBSS upon its request in a commercially reasonable time frame.

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It is our intent to do business with Warehouses who will provide products and services consistently to specifications, at a competitive price, and in accordance with a defined delivery schedule.

Many of the requirements in this Manual are regulatory in nature or are guided by regulatory mandates. We reserve the right to modify this Manual and its expectations for any reason, including in the event of regulatory changes, changes in the business climate, changes in our customer needs, and changes in our knowledge or understanding of the best way to protect the quality and safety of our products. Every Warehouse partner is expected to comply with all applicable laws related to food safety and is expected to stay informed of any changes to those laws.

Code of Conduct

We expect our Warehouses to share our commitment to honest and ethical conduct. We recognize that you are independent entities; however, your actions impact and reflect upon our organization. Therefore, we expect you and your employees, agents and subcontractors (collectively “Warehouse facilities”) to understand and adhere to our Supplier Code of Conduct, which is located in our JBSS Vendor Packet, on our website at <https://jbssinc.com/supplier-info/>, or can be acquired from your JBSS representative. You are expected to self-monitor your compliance and contact JBSS if and when any situation develops that causes or may cause you to be in violation of our Supplier Code of Conduct.

Confidentiality

The contracts between JBSS and the Warehouse will govern confidentiality of information shared by either company. All warehouse personnel should take care not to disclose warehouse confidential information to JBSS, unless there is a contract in place providing such disclosure. Auditors shall not be asked or required to sign confidentiality agreements as a prerequisite to gain access for audits prior to or at any time during a quality audit. . Auditors will not inspect personnel data, other than data relating to qualifications or training of technical and professional personnel performing functions pertinent to the audit.

Notification of Significant Events (MANDATORY CONTACT)

Communication in the supply chain is critical when events occur that could affect food safety, quality, or processing. The Warehouse must establish procedures to ensure JBSS is



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immediately notified of these occurrences. The Warehouse shall notify a JBSS Procurement Representative immediately of any, but not limited to, the following:

- Systematic product quality defect or process control deviation which could lead to a recall or withdrawal of a JBSS finished product;
- Discovery of potentially defective or adulterated ingredients or packaging materials associated with product in distribution;
- Inadvertent release from Hold of any material produced for JBSS;
- Non-routine Regulatory Authority investigations, testing, sampling, reporting, or other contact or action with the potential to affect material produced for JBSS. JBSS does not need to be notified of routine inspections, unless the inspection reveals that material produced for JBSS may not be in compliance with applicable law;
- Any event that leads the Warehouse to suspect that a non-conformance (specification, Regulatory, etc.) exists in product already shipped to JBSS;
- Product tampering or threat of tampering;
- Event or substance that could threaten product security;
- Notification by law enforcement or other authority of a potential product security event;
- Changes to Warehouse's processes and/or facilities;
- Inability to deliver materials/product that meet specifications; and/or
- If any of the Warehouse sites for JBSS loses any type of certification (e.g. GFSI, AIB, Kosher, HALAL, Organic, GE, RSPO, Certified Gluten-Free, etc.).



Section 2 – Federal, State and Local Regulatory Compliance:

Warehouses shall ensure that regulatory registrations or compliance documents have been completed and are up-to-date.

The U.S. registration requirements for the Public Health Security and Bioterrorism Preparedness and Response Act of 2002 (the Bioterrorism Act) are located at the Code of Federal Regulations (CFR) Title 21. As JBSS distributes throughout the United States, Warehouses are to conform to The Safe Drinking Water and Toxic Enforcement Act of 1986. This list is not all encompassing and is to be used for illustrative purposes only.

Under provisions of the U.S. law contained in the U.S. Federal Food, Drug and Cosmetic Act (the “Act”), importers of food products intended for introduction into U.S. interstate commerce are responsible for ensuring that the products are safe, sanitary, and labeled according to U.S. requirements. All imported food is considered to be interstate commerce. Importers can import foods into the United States without prior sanction by the FDA, as long as the facilities that produce, store or otherwise handle the products are registered with FDA, and prior notice of incoming shipments is provided to the FDA. Both imported and domestically produced foods must meet the same legal requirements in the United States.

For Canada, all commercial importers must have a business number for any import/export account with the Canada Border Services Agency. For most shipments entering Canada, importers will have to show an import/export account on customs documents. Compliance with the Canada Agricultural Products Act, the Feeds Act, the Meat Inspection Act, the Facility Protection Act, and the Seeds Act is mandatory.

Regulatory Inspections:

Each Warehouse for JBSS shall establish procedures for handling regulatory inspections. Procedures should address, in part, who is delegated to accompany regulatory personnel during an inspection or visit. A policy for your company should be drafted regarding photographs, copying of records, and sample taking.

Section 3 – Human Rights and Code of Conduct:

John B. Sanfilippo & Son, Inc. (“JBSS”) has a long history of committing to the implementation of high ethical standards in all aspects of its operations. At JBSS, our vision is to be a trusted partner for all our stakeholders, which is why integrity is one of our core values. We achieve this vision by balancing our strong desire for profitable growth with our commitments to employees, shareholders, and consumers. One of those commitments is acknowledging that all individuals should be treated with dignity and fairness. By upholding fundamental human rights principles, we aim to drive broader change in the communities we serve and create an inclusive and safe environment for our employees. We are committed to adhering to internationally recognized human rights and principles, including those principles reflected in the United Nations Universal Declaration of Human Rights, and require our suppliers to adhere to International Labor Standards outlined in our Supplier Code of Conduct.

JBSS requires its vendors and suppliers to comply with its Supplier Code of Conduct and Supplier and Co-Manufacturing Quality Expectations Manual. The company mandates fair labor practices, sustainable operations, and adherence to anti-corruption laws.

Please see JBSS Human Rights Policy and Code of Conduct under our Corporate Governance website at <https://jbssinc.com/investors/corporate-governance/>

In the event that the Warehouse becomes non-compliant with any slavery and human trafficking laws, it will immediately notify its JBSS representative so that proper action by JBSS, if any, may be taken.

Section 4 – Environmental and Social Responsibility Policy:

It is our intent to have our facilities partner with us to focus on environmental responsibility as a basic part of their daily activities, and that these values are communicated and shared with their employees, agents, and subcontractors.

Our Environmental Policy:

JBSS is committed to reducing our impact on the world’s resources today and for future generations by being environmentally responsible in our actions, practices, and decision making. Our mission is to create real food that brings joy, nourishes people, and protects the planet. To accomplish our mission, we strive to continually improve our operations, reduce the impact on the world around us and request the same from our consumers and suppliers.

Commitment: JBSS is dedicated to several principles, including reducing carbon emissions, recycling, conserving water, maintaining accountability, training employees, integrating environmental considerations into strategic planning, and complying with environmental laws.

Environmental Management Strategy: JBSS has a strategy to identify risks and opportunities for environmental improvement. The Corporate Responsibility Committee oversees sustainability and waste reduction efforts, ensuring transparency and integrity in communications.

Environmental Risks: JBSS faces climate change risks, compliance risks with emerging laws, and reputational risks due to consumer demand for sustainable products.

Environmental Opportunities: JBSS aims to reduce its environmental footprint through strategic partnerships, energy-efficient strategies, and responsible practices. They work with farmers to adopt sustainable approaches and are committed to using responsibly sourced palm oil (RSPO).

Energy Efficiency and GHG: JBSS is focused on reducing energy consumption and greenhouse gas emissions in its manufacturing plants through various improvements and assessments.

Waste Reduction and Sustainable Packaging: JBSS aims to reduce landfill waste and uses nut byproducts in operations. They are committed to using environmentally friendly packaging and reducing plastic dependency.



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Water Reduction and Wastewater Management: JBSS monitors water usage and wastewater management to ensure regulatory compliance and explore ways to enhance water usage internally and externally.

Please see our Environmental Policy for more information: <https://jbssinc.com/environment/>

Our Social Responsibility Policy

At JBSS, we are committed to upholding the highest standards of human rights, ethical conduct, and social responsibility across all aspects of our operations and supply chain. Our policies are grounded in internationally recognized human rights principles, including those outlined in the United Nations Universal Declaration of Human Rights, and are enforced through our internal codes and supplier agreements.

We maintain strict employment practices that prohibit the use of child labor, with a minimum employment age aligned with applicable laws. JBSS does not tolerate any form of forced labor, human trafficking, or exploitation. We are equally committed to providing a workplace free from abuse, harassment, and discrimination. Our policies comply with all federal, state, and local laws, including those related to non-discrimination and affirmative action. We are an equal opportunity employer and do not discriminate based on race, color, religion, sex, sexual orientation, gender identity or expression, national origin, disability, veteran status, or any other protected characteristic.

Freedom of association and the right to collective bargaining are respected throughout our organization and supply chain. We comply with all wage and hour laws, including those governing minimum wage, overtime, and maximum working hours. Our commitment to employee health and safety is reflected in our rigorous training programs, adherence to OSHA regulations, and continuous evaluation of workplace conditions to prevent injuries and promote well-being.

JBSS also upholds the highest standards of business integrity. We have zero tolerance for corruption, bribery, fraud, or any unethical business practices. All employees and supply chain partners are trained on anti-corruption laws, including the U.S. Foreign Corrupt Practices Act. We maintain confidential reporting channels to encourage the reporting of any suspected violations without fear of retaliation.



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Through our Corporate Responsibility Committee, we actively engage in community outreach, support sustainable agriculture, and collaborate with industry partners to drive positive change. Our goal is to create a safe, inclusive, and ethical environment for our employees, partners, and the communities we serve.

For more information please see our Human Rights Policy at <https://jbssinc.com/investors/corporate-governance/> .

Section 5 - Donations:

Requests to donate ANY finished product that have been made for JBSS should be sent to the Warehouse's JBSS representative to coordinate within John B. Sanfilippo & Son, Inc., to respond to the donation request.

Policy:

JBSS is committed to quality, food safety, and only donating quality finished products, which are safe and in compliance with applicable laws. While we support donating quality food products, our donation process assures that all donated product complies with all label laws, is safe for consumption, and is in packaging with proper seal integrity.

Facility will be expected to request approval from JBSS for all donation requests. John B. Sanfilippo & Son, Inc. will never authorize the donation of product that is not wholesome and/or correctly labeled.

Section 6 - Quality System Requirements and Quality Programs:

Warehouses shall have a documented quality plan in place to ensure compliance with federal, provincial, state and local regulations and adherence to the expectations of this Manual.

Policy:

To employ a quality management system is to document a company's quality practices that satisfy the requirements and expectations of customers, and to improve the overall quality management of a company. A quality management system shall address the design, development, and production of a company's products. A quality manual should be divided into segments that correlate to the quality management system. Each section should have a statement iterating a company's intention, and its obligation to apply the fundamental requirements of the referenced section. A quality manual should describe a quality management system, assign responsibility and detail the working relationships of the individuals or positions responsible for performing within the system.

A quality manual should provide procedures or references for all activities covered by the quality management system to ensure compliance with the necessary requirements of a standard. The manual should be used to help the employees through the various requirements of standards that must be met and maintained in order to ensure customer satisfaction, continuous improvement, and provide the necessary instructions to complete the system. A quality manual should be used as an external tool to demonstrate a quality management commitment to customers and other external parties.

Requirements:

The Warehouse's quality plan shall document the organization's quality management system. It shall be maintained in a quality manual.

The Warehouse's quality manual shall be driven by a team selected upon experience and knowledge. The team shall:

1. Demonstrate the ability to meet all regulatory requirements, product specifications and requirements stated in this Manual;

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2. Ensure all quality system elements are reviewed annually to confirm that they are continuing to serve the stated goals;
3. Be committed to the success of the quality manual system and plan, and provide operational guidelines, ensure the availability of resources, and prioritize efforts for continual improvement of the quality manual system;
4. Ensure that all deviations or breakdowns in the quality plan will be followed up with documented root cause analysis and corrective and preventive measures;
5. Ensure that a written recall program is in place and in full compliance with the expectations of regulatory authorities and ensure that actions in recalling affected products are in coordination with regulatory agencies;
6. Ensure that regulatory complaints or recall actions received by the Warehouse are immediately relayed to JBSS's VPs of Operations & Food Safety, Quality & Regulatory Compliance;
7. Ensure that Warehouses effectively implement the key quality programs outlined in this Manual as part of the Warehouse's quality manual system; and
8. Ensure that Warehouses have a program in place to confirm that materials and ingredients comply with specifications and applicable regulations. The control of materials shall follow a formal program with sampling, testing, and traceable documentation of inspection results and material certifications.



Section 7 - Good Manufacturing Practices (GMPs):

Warehouses for JBSS shall develop and implement GMP guidelines to ensure the following requirements are met and are in compliance with current GMP programs.

Policy:

JBSS has established the below requirements for maintaining GMPs for all Warehouse facilities. They are a part of the methods and controls for preventing product contamination throughout the supply chain.

Requirements:

The Warehouse shall develop a Good Manufacturing Practices (GMP) program that, at a minimum, complies with all applicable local, state, and federal regulations. This program shall cover all aspects of warehouse operations, including material receipt, storage, selection, shipping, and any other relevant departments. The GMP program shall apply to all individuals within the facility, including employees, visitors, contractors, and temporary personnel. It must include the establishment of corrective actions for any identified deficiencies and maintain appropriate records for review. Additionally, the program shall detail documentation procedures, record keeping, and record retention policies.

The Warehouse's GMP program shall also address specific operational controls, including construction and design considerations (as further detailed in the Facilities section), and product storage protocols. Products must never come into contact with the floor or other unsanitary surfaces; any utensils that do must be cleaned before reuse. Damaged products must be promptly removed from active selection slots and appropriately disposed of. All products should be stored on clean pallets with a slip sheet between the product and the pallet. Adequate and shielded lighting must be provided in all product storage and inspection areas. Water control measures must also be in place, including the use of potable water, backflow prevention devices, elimination of dead-end pipes, and proper maintenance of sprinkler systems, as further detailed in the Facilities section.

The program must address communicable diseases by ensuring that any individual exhibiting symptoms of a transmissible illness (e.g., vomiting, diarrhea, fever) is removed



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from food contact operations. Individuals diagnosed with a potentially transmittable disease must not return to work until cleared by a physician. Anyone with an exposed cut or wound must not handle products until the injury is fully protected with a waterproof covering. In cases involving bodily fluids such as vomit or blood, documented biohazard control procedures must be followed. These procedures may include containment of the affected individual, disinfection practices, segregation of potentially exposed products and materials, and thorough sanitation of impacted areas.

Hand washing protocols must be strictly enforced. A designated hand wash sink must be used exclusively for hand washing, and signage in appropriate languages must be posted at restroom entrances to remind personnel of this requirement. Hand washing sinks must not be used for washing parts or equipment. Employees are required to wash their hands at the start of each shift, after any contamination or excessive soiling, after any absence from the work area (including eating, smoking, or using the restroom or break areas), and after sneezing or coughing into their hands.

Finally, certain activities are strictly prohibited in food handling areas. These include eating and drinking, unless hydration stations are provided and maintained in a sanitary manner; smoking or using tobacco products, including e-cigarettes; and sitting or standing on ingredients, food products, or packaging materials.



Section 8 - Receiving, Storage and Transportation Procedures:

Warehouses are required to evaluate the practices undertaken in storage and transportation to ensure safe, wholesome foods are delivered on behalf of JBSS to the customer and consumers.

Policy:

The following requirements are important in maintaining food safety and quality throughout the supply chain. Warehouses shall develop food safety and quality programs that address the following storage and transportation requirements of materials intended for JBSS.

Requirements:

1. The Warehouse shall develop a Storage and Transportation program to control/facilitate:
 - a. Receiving
 - i. All incoming shipments shall be inspected before unloading.
 - ii. Trailers must be free of rodents, insects, spillage, objectionable odors, excessive moisture and extraneous material.
 - iii. Trailers must be clean and in good repair and have no holes, cracks or crevices which would harbor pests or allow pests to enter.
 - iv. Pallets will be visually examined to ensure they are in good condition, and show no signs of damage, debris or pest activity.
 - v. Each load of incoming raw materials must have the seal numbers confirmed against the seals written on the Bill of Lading by the facility. Seal must be removed by receiving personnel. LTL loads will be sealed with a padlock or have a product inspection program in place.
 - vi. Acceptable seals for palletized ingredients include but are not limited to:
 1. Drums with locking ring
 2. Drums without a locking ring secured with tamper evident tape
 3. Large bags such as supersacks or totes containing plastic liners with a bag closure that will readily reveal any tampering



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and will not permit removal/reinstallation without breaking the seal

4. Corrugate cases effectively sealed and tamper-evident

b. Warehousing & Storage

- i. Ingredients and finished goods shall be stored and maintained under appropriate temperature requirements with verification checks.
- ii. Where thawing of ingredients is necessary, thawing shall be done in a manner that prevents the raw materials and other ingredients from becoming adulterated.
- iii. No materials shall be stored directly on the floor or walking surfaces.
- iv. Exercise care in moving, handling, and storing product to avoid damage to ingredients and finished goods resulting in spillage which might contribute to the creation of unsanitary conditions.
- v. 18" perimeter areas will be maintained and kept clear, clean and in good repair, allowing for inspection, cleaning and pest control operations.
- vi. Goods "on hold" shall be clearly marked and effectively controlled to avoid accidental shipment. Hold items shall not be moved or handled by unauthorized personnel. Product Non- Conformance/Hold Policy shall be documented and followed.
- vii. Food product containers and packaging materials must be stored in a clean, dry and sanitary manner.
- viii. Ingredients must be stored in a clean, dry and sanitary manner, in the original, labeled container, or in an authorized sanitary container that is clearly marked for use of the specific ingredient.
- ix. Partial ingredient containers must be properly closed/sealed/covered, and the identification and lot information maintained.
- x. Over-stacking of product should be avoided, and dividers should be used, as required, to prevent damage to stacked goods.
- xi. Keep racks, pallets, and lift trucks clean.
- xii. Pallets must be clean and have no loose nails or boards that can damage the ingredients or finished product.
- xiii. Should damage occur to any ingredients or finished goods, any spill is to be immediately cleaned up.



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- xiv. Broken or damaged ingredient containers should be removed from storage immediately. Materials that have been exposed to possible contamination will be disposed.
- xv. Overhead doors, loading dock doors and other openings must be closed when not in use.
- xvi. Inventory control procedures must be documented and adhered to at the facility level - with emphasis on first in, first out (“FIFO”) methodology.
- xvii. Idle or unused items should be properly stored so that they do not interfere with preventative sanitation procedures.
- xviii. Trailers stored in the yard must have the doors kept closed and secured.

c. Shipping

- i. All outgoing shipments shall be inspected before loading.
- ii. Trailers must be free of rodents, insects, spillage, objectionable odors, excess moisture, and extraneous material.
- iii. Trailers must be clean and in good repair and have no holes, cracks or crevices, which would harbor pests or allow pests to enter.
- iv. An accurate, permanent, and legible code must appear on each product unit and each product shipper.
- v. If the item is temperature controlled, it must be handled per facility procedures and be pre-cooled to the appropriate temperature.
- vi. Warehouses shall deliver to JBSS an accompanying COA, as requested per specification.
- vii. JBSS products shall not be shipped in the same trailer as chemicals (e.g., pesticides; non-food grade) or other hazardous materials.

2. This program shall:

- a. Be a pre-requisite program to its Food Safety plan.
- b. Be incorporated into JBSS recall and traceability programs.
- c. Address food security risks to include locks/seals for inbound/outbound trucks.
- d. Address documentation and record retention.
- e. Address employee training relevant to practices involved with warehousing and transportation.
- f. Addressing self-inspection as a verification activity.
- g. Ensure corrective actions and preventive measures are addressed as needed, with documentation.



Section 9 - Facilities:

Warehouses are required to routinely evaluate their facilities to ensure safe wholesome foods are stored and delivered to JBSS, its customers, and consumers.

Policy:

JBSS has established the below requirements for all Warehouse facilities. They are a part of the methods and controls for preventing product contamination throughout the supply chain.

Requirements:

1. Warehouse management must ensure their facility complies with the following requirements:
 - a. Outside Grounds – The grounds must be kept in a condition that will prevent pest harborage, in order to ensure protection against the contamination of food.
 - b. Construction and Design – The facility must be suitable in size, construction, and design to facilitate maintenance and sanitary operations for food-storage purposes (e.g., holding).
 - c. Floors, Walls, and Ceilings – Floors, walls, and ceilings shall be constructed in such a manner that they can be adequately cleaned and kept in good repair.
 - d. Lighting – Provide adequate lighting in hand-washing areas, dressing and locker rooms, toilet rooms, all areas where food is examined, re-packed or held and where equipment or utensils are cleaned.
 - e. Screening – Provide where necessary adequate screening or other protection against pests.
 - f. Water Supply –Running water must be at a suitable temperature, and under adequate pressure for its need.
 - g. Plumbing – Plumbing must be of adequate size and design and adequately installed and maintained to:
 - i. Properly convey sewage and liquid disposable waste from the facility.
 - ii. Avoid constituting a source of contamination to food, water supplies or creating an unsanitary condition.



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- iii. Assure that there is no backflow from or cross-connection between piping systems that discharge wastewater or sewage and piping systems that carry water for food or food manufacturing.
 - h. Drains – Drains shall be designed and maintained to provide adequate drainage to ensure no product contamination risk.
 - i. Trash – Refuse receptacles must be provided, clearly labeled, constructed, and maintained in a sanitary manner.
 - j. Freezer and Cold Storage – Each freezer and cold storage compartment used to store and hold food capable of supporting growth of microorganisms must be fitted with an indicating thermometer, temperature-measuring device, or temperature-recording device so installed as to show the temperature accurately within the compartment.
- 2. The management of the Warehouse must maintain buildings, fixtures, and other physical elements of the building in a sanitary, and adequate condition to prevent food contamination. Where and when applicable:
 - a. Temporary repairs should be inspected and maintained in a way that prevents product contamination until permanent repairs can be made.
 - i. Permanent repairs should be made promptly.
 - ii. For water events (e.g., roof leaks), water shall be contained, any affected product put on hold for JBSS evaluation, and repairs to be made promptly.
 - b. Facilities must have a Preventive Maintenance program in place.

Section 10 - Employee Food Safety Training:

Employees at Warehouse facilities must be trained on the facility's Food Safety programs and systems.

Policy:

JBSS has established the below requirements for all Warehouse facilities regarding employee training that is relevant to all full time, temporary, new, and seasonal employees and contractors. Training must be planned, functional, proven effective, and documented.

Requirements:

1. All temporary, new, and seasonal employees and contractors must complete training prior to working in the facility.
2. If an employee starts a new job/position within the facility, they shall receive training relevant to their new job/position.
3. All warehouse employees must be trained annually, at a minimum, in glass control, GMPs including food hygiene, allergen control, ingredient handling/storage control, chemical control, and food safety programs.
4. The training must be relevant to the employee's job function. The employee must be able to demonstrate they understand the training and can perform the job in way that prevents a food safety risk.
5. Training sessions must:
 - a. Be scheduled to include all employees across all shifts.
 - b. Be performed in a language the employees understand; multilingual where appropriate.
 - c. Be conducted by authorized personnel.
 - d. Be verified to be effective.
 - e. Be documented for all employees.
6. Employee receiving, monitoring and verifying Critical Control Points (CCPs)/ Preventive Controls (PCs) must receive additional training specific to those requirements. Training shall include of expected actions when CCPs/PCs are out of compliance.

Additionally:



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1. Management shall be trained on the facility's Crisis Management procedure and protocols annually.
2. Visitors entering product handling areas shall be instructed in relevant personal and food safety practices.



Section 11 - Food Safety Plans:

Warehouses shall develop a Food Safety plan specific to their manufacturing process (if required) and one that is supported by pre-requisite programs.

Policy:

JBSS has established the below requirements for all Warehouse facilities regarding the Food Safety plan (if required) for that location.

Requirements:

1. The Warehouse shall develop a comprehensive food safety team inclusive of all departments.
2. The Warehouse shall ensure that the team conducts frequent meetings to drive food safety through the Food Safety plan.
3. The Warehouse's Food Safety plan shall be consistent with the principles required by regulatory bodies as defined in 21 CFR Subpart 117.
 - a. Conduct a hazard analysis
 - b. Determine the Control Points ("CP")
 - c. Establish control limits
 - d. Establish monitoring procedures
 - e. Establish corrective action(s)
 - f. Establish verification procedures, and
 - g. Establish record-keeping and documentation procedures
4. To facilitate the Food Safety plan, the Warehouse shall include the following documentation:
 - a. Product description and intended use.
 - b. A process flow chart showing CPs.
 - c. Hazard analysis for each process.
 - d. A CP summary table showing points 3(a) through 3(g) above.
 - e. Food Safety Plan deviation and corrective action log
 - f. CP records.
5. Warehouses are to assemble a team to investigate any deviation from a CP to:
 - a. Identify the cause of the deviation.
 - b. Reestablish control of the CP once corrective action is taken.

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- c. Take measures to prevent recurrence, and to ensure no product injurious to health or otherwise adulterated as a result of the deviation enters commerce.
- 6. In addition, Warehouses shall:
 - a. Develop comprehensive preventive controls to support the Food Safety plan
 - b. For warehouses with exposed product, provide formal training to at least one individual on the Food Safety team including some form of recognized certification at the successful completion of the course (such as Preventive Controls Qualified Individual (“PCQI”) training)
 - c. Review the Food Safety plan at least annually, or more frequently following a deviation from a CP, a process change, new equipment or other instance that causes a change in a process
 - d. Include the Food Safety plan in all third party GMP/Food Safety audits
 - e. Provide comprehensive training that is available to employees responsible for maintaining/monitoring a CP
 - f. Provide familiarization training to employees of the manufacturing company

Note: a modified food safety plan may be appropriate depending for facilities that are solely engaged in the storage of unexposed packaged food (21 CFR 117.7(a)) or storage of RACS (other than fruits and vegetables) intended for further distribution or processing (21 CFR 117.5(j)).

Section 12 - Integrated Pest Management (IPM):

Warehouses shall have an IPM program in place to ensure an optimal degree of safe and proper usage of pest control measures designed to eliminate pests, insects and other creatures that create unsanitary conditions.

Policy:

JBSS has established the below requirements for all Warehouse facilities to assure that pests are managed within the facility's grounds, warehouse spaces and building exteriors.

Requirements:

Warehouses are encouraged to hire a 3rd party state-licensed pest management company to supplement and guide the facility's pest control program. To be successful, the Warehouse's IPM program must include the following:

1. Sanitation, housekeeping, and GMPs.
2. Scheduled facility and grounds inspection and surveillance.
3. A solid facility design that is maintained to ensure physical pest exclusion.
4. Stock handling / warehousing technique that follows first in first out ("FIFO") practices.
5. Appropriate use and placement of mechanical and non-mechanical pest control devices.
6. Appropriate selection and application of pesticidal chemicals.
7. Maintained documentation showing evidence of an IPM program and verification steps.
8. Pest activity data shall be evaluated to enable root-cause analysis leading to corrective action.
9. Chemical application is only performed by a qualified and certified individual.
10. If kept on premise, pesticides should be stored under key, safely removed from food and food material.
11. All pest control chemicals shall be used in accordance with the label and shall comply with (as relevant):
 - a. Environmental Protection Agency ("EPA")
 - b. Federal Insecticide, fungicide, and Rodenticide Act (FIFRA 7 U.S. Code 136 et seq.)



Warehouse Expectations

- c. Code of Federal Regulations (“FCR”)
 - d. United States Department of Agriculture (“USDA”) National Organic Program (“NOP”).
 - e. Occupational Safety and Health Administration (“OSHA”)
12. At a minimum, an annual documented review of the program between the facility and the pest control provider discussing the program’s effectiveness, including opportunities for improvement within the program for both the facility and the pest control provider.
13. If fogging were to occur due to infestation, the product(s) would need to be removed.



Section 13 - Cleaning and Sanitizing Practices:

Warehouses are to ensure that a sanitation program is established and appropriate, preventing product adulteration and/or contamination, maintained against a master sanitation schedule (MSS).

Policy:

To ensure the storage of safe and wholesome foods, it is imperative that a Facility employs a sanitation program. “Sanitation”, in the context of this Manual, is the cleanliness of a facility and its equipment. Food industry equipment shall be constructed of material regarded as safe and being of a sanitary design.

Requirements:

1. 1. A Warehouse master sanitation program shall address:
 - a. Day to day activities regarding floors, racking, and personnel
 - b. Scheduled periodic or non-daily cleaning tasks
 - i. Refrigeration units
 - ii. Walls
 - iii. Storage areas
 - iv. Employee wellness
 - v. Etc.
2. A Warehouse’s master sanitation program shall:
 - a. Be a pre-requisite to the Warehouse’s Food Safety program(s) utilized in the facility.
 - b. Indicate responsibility for maintaining each segment of the program.
 - c. Detail corrective actions to be taken following a deviation from the program.
 - d. Be written and include documentation requirements and record retention.
 - e. Detail training requirements for all personnel involved in the/a sanitation role, to include chemical use and safety.
 - i. Training is to be documented and retained for review.
 - ii. State compounds and sanitizers approved for food handling facilities to be used in the sanitation process (in conjunction with, or through the chemical control program).

Section 14 - Document Management and Change Control:

Warehouses are to establish and maintain a document control system in their operations, as this activity is a foundational element of any successful process, procedure or business.

Policy:

A master list of controlled documents is a prerequisite for managing an inventory of documents and records. As documents evolve, it is important to know the difference between revisions, as a change to a procedure can potentially change product handling or storage. It is important that all personnel are referencing the same, current version of the document.

Requirements:

1. A document management system shall be defined and maintained.
2. The system of maintaining document control shall be defined.
3. The responsible person or position for maintenance of the system shall be defined.
4. An up-to-date register of documents and amendments to documents shall be defined and implemented.
5. A system ensuring personnel have access to current documents shall be defined.
6. A system ensuring obsolete documents are removed from distribution/accessibility shall be defined and implemented.
7. All documents are to be safely stored and readily accessible.



Section 15 - Allergen and Sensitive Ingredient Control:

A Warehouse is responsible for ensuring that allergens and sensitive ingredients housed within the facility are handled appropriately, preventing cross-contamination by products that are deemed allergenic, sensitizing or containing an allergenic or sensitizing ingredient.

Policy:

JBSS includes allergens and sensitive ingredients recognized by the FDA's Food Drug & Cosmetic Act (FACLP) and Canada's Food and Drug Regulations (Project 1220 — Enhanced Labeling for Food Allergen and Gluten Sources and Added Sulfites) that require control measures to be implemented. JBSS will provide documentation relating to allergens to the Facility. A documented risk assessment shall be carried out and be maintained as part of the Food Safety plan (if required).

Requirements:

The program shall start from the receipt of goods through to the shipping. The program shall identify which incoming materials are allergenic or have allergens present before bringing them onto the site. Identified materials shall be assessed as to whether they pose a risk to other products in storage or in subsequent processing steps. Where a risk has been identified (e.g., spilled product), an inspection of the site shall be carried out to prevent cross contamination. Any controls identified as necessary to eliminate or reduce cross contact, shall result in an agreed plan of action. The program shall perform compliance audits at a commercially reasonable frequency based on the risk assessment and previous audit results, if any.

Sanitation Requirements:

1. An effective cleaning takes place after the breakage or potential cross-contact event to control allergen cross-contact risks.
2. The cleaning methods minimize the risk of trace allergenic material being detected.

Training Requirements:

The program shall ensure that training is documented and provided to all employees, and that training shall take into consideration the following:

Date of Issue: July 1, 2025



JOHN B. SANFILIPPO & SON, INC.

Revision Date: New

Warehouse Expectations

1. An explanation of anaphylaxis and common food allergens.
2. The general precautions covered by the plan to prevent contamination with allergenic material.
3. Specific precautions in place for explicit job roles.
4. Training for existing, new, and temporary staff.
5. Specific responsibility for supervisory staff to ensure that the plan is executed as written.
6. Refresher training on at least an annual basis.
7. Written documentation of all training.

Verification and record keeping:

Regular audits / inspections of allergens in fragile packaging storage areas and controls must be in place to ensure that procedures are effective and working properly. Internal audits records must be completed, which shall include:

1. Non-conformances
2. Corrective action
3. Responsibility



Section 16 - Chemical Hazard Control:

Warehouses must have a chemical control program in place to assure that employees, products, customers, and the environment are protected from harmful exposure.

Policy:

The purpose of a chemical control program is to ensure personal safety, product integrity, and the protection of the environment at all times. Chemical control activities are to be conducted in accordance with federal, provincial, state and local regulations. The use of chemicals shall be done in adherence to labeled instruction.

The chemical control program requirements stated by JBSS are not all encompassing and do not address all potential chemical hazards or situations. It is the responsibility of the Warehouse to assess the risk(s) associated with each process and implement controls that satisfy JBSS and/or customer requirements.

Requirements:

1. The Chemical Control Program shall:
 - a. Be a pre-requisite to the Food Safety Plan(s) implemented in the facility.
 - b. Identify all chemicals used and/or stored in a facility or on site that pose a potential food safety or environmental concern.
 - c. Require Safety Data Sheets (“SDS”) for each chemical used and/or stored in the facility and ensure that these are accessible to JBSS and all employees and visitors.
 - d. Cover inventory control.
 - e. Cover chemical identification of primary and secondary containers.
 - f. Cover chemical control (safe keeping/mixing) to ensure protection from adulteration of food, food contact surfaces, and food contact packaging material.
 - g. Address training of employees in chemical safety and use.
 - h. Address documentation, corrective actions, and record retention.
 - i. Address program verification procedures and frequencies.

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When performing a risk assessment for chemicals, considerations shall be made for sanitation, food additives, machine lubricants, pest management, agricultural, naturally occurring chemicals (toxin), drug residue, or other issues, as necessary.

Section 17 - Physical (Foreign Material) Hazard Control:

The Warehouse is responsible for ensuring conditions, equipment, storage and manufacturing facilities are of sound construction and are intended for food handling and storage.

Policy:

The purpose of a foreign material/foreign object control program is to ensure that all precautions are taken to prevent product contamination from the environment, equipment or storage conditions.

A documented risk assessment shall be carried out and maintained as part of the Food Safety Plan to ensure the elimination or control of foreign material. A foreign material/object control plan may be further defined outside of the Food Safety Plan. A freestanding program should address further controls to support the Food Safety plan. Hazards maybe associated with some products such as metal from equipment or wood from pallets.

Glass & Brittle Plastic Control:

It is imperative to ensure a framework is created and in place to properly identify and effectively mitigate recognized potential risk points in handling glass packaging material. We recognize that effective preventive measures begin by partnering with responsible vendors and culminate through product shipping. We expect a Warehouse's policy outlines the basis for best practices, control measures and responsibilities for handling glass at every point in their process. Warehouses shall have a glass and brittle plastic policy that addresses, at a minimum, the following:

1. Vendors and carriers, who should be selected based on safety and quality.
2. Receiving expectations and best practices.
3. Internal storage expectations and best practices.
4. In-process handling expectations and best practices.
5. In-process breakage procedures, expectations, and best practices.
6. Corrective and preventive actions.



Section 18 - Rework / Returns Control:

Warehouses shall implement a program to both monitor and control the use of rework in finished products that are to be handled by JBSS.

Policy:

Rework is the act of utilizing previously delivered materials, repacking, or relabeling of products. The utilization of rework and additional product handling potentially increases risk to product quality and safety. It is imperative that rework is managed so as not to denigrate a product's quality attributes or its safety.

Requirements:

1. The Warehouse's rework control program shall:
 - a. Be a recognized step in the Food Safety Plan, if rework is utilized.
 - b. Be a documented pre-requisite program that will support the Food Safety Plan.
 - c. Ensure the shelf-life of rework is acceptable prior to utilization.
 - d. Indicate how and when primary and secondary containers are identified.
 - i. Identification shall be clear and legible to all employees.
 - e. Ensure complete synchronization with the allergen control program.
 - f. Indicate record generation associated with each rework activity.
 - g. Ensure complete synchronization with traceability program.
 - h. Address corrective actions as needed.
 - i. Address documentation and record retention.
 - j. Address the training requirements ensuring all responsible persons are familiar with the program and its intent.

Section 19 - Temperature Control:

The Warehouse must have a Temperature Control Program to ensure temperatures are managed appropriately within the facility.

Definitions:

Ambient storage/transport: Prevailing conditions with no control over temperature or humidity required or expected.

Dry storage: Prevailing conditions controlled to avoid absorption of humidity from air. Temperature range +10°C to +25 °C (50°F to 77 °F), relative humidity < 65%.

Conditioned storage/transport: Temperature controlled within a defined range of +10°C to +20°C (50°F to 68 °F). Humidity maximum 65%.

TCU: Temperature Controlled Unit.

Chilled/Refrigerated storage: Temperature controlled within a defined range of +1°C to +8°C (34°F to 45 °F). Humidity range not defined. Consistent with US FDA requirements.

Refrigerated: Temperature controlled within a defined range of +1°C to +4°C (34°F to 40 °F). Humidity range not defined. Consistent with USDA Food code for meat products. Procedures in place to assure that products are pre chilled to required temperature prior to loading, and vehicles are pre chilled prior to loading for distribution.

Protected: Temperature controlled within a defined range of +1°C to +35°C (34°F to 95°F). Humidity range not defined.

Requirements:

1. The facility must maintain a list or log of temperature monitoring equipment critical to quality, food safety, and regulatory requirements that must include:
 - a. Serial Number
 - b. Manufacturer
 - c. Description
 - d. Type of Calibration (internal or external)
 - e. Location of the Equipment
 - f. Calibration Frequency
 - g. Date of Calibration



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- h. Calibration Company
 - i. Re-Calibration Date
2. The frequency of calibration may be determined according to:
 - a. Manufacturers recommended calibration interval
 - b. After a critical project (new line, etc.)
 - c. After an event (where the equipment could have been damaged)
 - d. Critical Nature of the Measure (CP)
 3. Internal calibration records and external calibration certificates must be maintained
 4. When measuring equipment is found to be out of standard, a risk assessment must be completed to determine any product implication regarding food safety, quality, or regulatory
 - a. Corrective actions must also be determined when equipment is found to be inaccurate
 5. For equipment calibrated internally, documented training on how to calibrate the equipment must be provided to relevant employees

Section 20 - Product Identification & Traceability Program:

Warehouses must ensure that all products received by JBSS are properly identified using an approved label and agreed-upon coding, and must also maintain a documented traceability program to ensure all materials are traceable throughout the entire supply chain.

Policy:

Misidentification (coding, labeling, etc.) or illegible identification of product can lead to serious consequences for a manufacturing facility, such as withdrawal from sale or injury to a consumer. Therefore, clear and accurate identification of products received is paramount.

Traceability is the ability to understand the history, application, and/or location of materials associated with production or storage, or supply-related activities, including the movement of products across the supply chain. JBSS will assist Warehouses in isolating the source and extent of issues. This will help reduce the production and distribution of unsafe or poor-quality product, lessen potential liability, and prevent a potential recall.

Requirements:

Warehouses must employ a program that assures that all products are labelled and identified per regulatory compliance standards. Any questions that arise, the Facility is to contact JBSS.

1. A Warehouse's traceability program shall:
 - a. Be documented and based upon the GS1 Recall standard.
 - b. Be a pre-requisite to the Warehouse's Food Safety plans.
 - c. Ensure each ingredient and contact packaging material is traceable from its facility, through to the finished product and subsequently through the first step of transportation to a receiving party (one-up and one-down).
 - d. Ensure each finished product is traceable from its facility through the first step of transportation to a receiving party (one-up and one-down).



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- e. Address rework when or if used.
- f. Address corrective actions and preventive measures, including documentation.
- g. Provide documented training to individuals responsible for the execution of the program.
- h. Address documentation and record retention.

Section 21 - Control of Non-Conforming Material / Problem Resolution:

Warehouses shall have a process that provides prompt and efficient actions to identify the cause of nonconforming product, implement corrective actions and prevent distribution of further suspect product.

Policy:

Nonconforming products are products that are potentially unsafe or products that deviate outside of the quality specification parameters.

Requirements:

1. Warehouses shall develop a non-conforming product program.
2. Warehouses shall ensure non-conforming product is held under quarantine through the written hold/release/reject procedure until JBSS has demonstrated that the product meets specification, or the product is handled through another method (destruction, rework, other).
3. Warehouses shall incorporate the non-conforming product program into the pre-requisite program.
4. Warehouses shall ensure pointed training is given to allow program execution.
5. Warehouses shall ensure corrective and preventive actions are documented each time control of product is lost or mishandled.
6. Warehouses shall ensure that a non-conforming product program shall address documentation and record retention.

Section 22 - Crisis Management:

Warehouses must have a documented Crisis Management Program to include provisions of supply contingency and emergency contact information.

Definitions:

Incident – a situation in which receiving, holding, transporting, in-process and/or finished product might be at risk and needs to be isolated; an ‘incident’ would result in JBSS being notified with details of the ‘incident’ and a Corrective Action and Preventive Action (“CAPA”) to be performed, the results of which should be sent promptly to JBSS for review and acceptance.

Trace Exercise – the practice of tracing raw materials, packaging, and/or finished goods from receipt through production, and to locations shipped.

Mock Recall – part of the Crisis Management Program; the practice of testing the ability for the Warehouse to have effective and accurate communication to customers/facility in the event of a Withdrawal or Recall.

Requirements:

1. The Crisis Management Program must clearly define what constitutes an ‘incident’ as described above.
 - a. Must be risk based and product/process specific.
 - b. Must include an internal line of communication for when an ‘incident’ occurs.
2. An Incident report must be completed and include:
 - a. Identification of the ‘incident’.
 - b. A timeline of events.
 - c. If all the product has been accounted for and where it is.
 - d. Details from the investigation, root cause, corrective, and preventive actions.
3. The Crisis Management Program should be tested annually to ensure that:
 - a. The internal facility list of contacts is accurate and up to date
 - b. Traceability is effective through conducting an annual mock recall.
 - c. Trace goods at least one step forward and one step backward as well as know the shipper/transporter of the goods.



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- d. Product identification methods are effective.
 - e. Communication streams from within the Warehouse to JBSS are accurate and efficient.
 - f. JBSS will not have interrupted service to their customers.
4. If requested, such as in the event of a product recall or other product-related issue, the supplier must provide the relevant traceability information to JBSS within 4 hours with a goal of 100% traceability to the point where the product is no longer within the facility's control.



Section 23 - Recall / Withdrawal Program:

Warehouses shall ensure that a functioning recall/withdrawal program is available and tested through a mock recall at a stated frequency.

Policy:

A recall of materials is a procedure whereby steps are taken by a company that are needed to protect consumers from adverse effects of a contaminated, adulterated, or misbranded product. A material market withdrawal occurs when a product is deemed to have a violation that is important enough to remove the product from the marketplace, but which is not seen as an immediate risk to consumer safety. Please also see the *Crisis Management section of the Manual for more information.*

Requirements

1. 1. A Warehouse recall/withdrawal program shall:
 - a. Be documented and be part of a pre-requisite to its Food Safety Plans.
 - b. Appoint a Recall Coordinator by name or position.
 - c. Develop a complaint management program to assist with early detection of potential problems.
 - d. Have the means to measure the effectiveness of a recall.
 - e. Maintain a communication list of customers.
 - f. Satisfy federal, provincial, state and local regulatory authorities in the United States and Canada, as applicable.
 - g. Stipulate the performance of an annual “mock recall” exercise for material stored within the facility (ingredients or finished products, as applicable).
 - h. Be documented to allow the identification of weaknesses.
 - i. Cite corrective and preventive actions to be taken following a mock recall.
 - j. Provide an emergency contact list to our Corporate Quality Assurance Department.
 - k. Address training, team assembly and related documentation retention.
 - l. Stipulate the notification to JBSS’s Corporate Quality Assurance Department regarding the following types of events:

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- i. A federal, provincial, state, or local regulatory official contacts the Warehouse regarding a food safety issue that could potentially result in a recall or product withdrawal of JBSS product.
 - ii. Identification of a food safety issue that requires notification to a regulatory agency.
2. Warehouse agrees to participate in any mock recall/withdrawal activity as initiated by John B. Sanfilippo & Son, Inc. as requested to completion in a timely manner.



Section 24 - Complaint / Inquiry Management Process:

Warehouses must employ a process to manage complaints and inquiries from JBSS in an efficient manner. Conversely, Warehouses must communicate to JBSS for any instance relating to statutory obligation, service standard or expected standard.

Policy:

Complaints/Inquiries should be viewed as opportunities for Warehouses to improve their service of product. JBSS will share details of the complaint and will include relevant information.

Requirements:

Warehouses are expected to have a formal written complaint resolution policy that covers at a minimum the following:

1. An outline of the process undertaken following the receipt of a complaint.
2. Identification of a responsible position or person to act as the communicator with JBSS.
3. Acknowledgement of the receipt of a complaint within 24 hours (or the next business day) with an expected response time.
4. Upon receipt of a complaint, investigation by the Warehouse of the cause and instillation of corrective actions, as needed.
5. A written response to complaints once the investigations and corrective actions have been finalized, including:
 - a. Findings of the investigation.
 - b. Interim action (short term).
 - c. Root cause analysis.
 - d. Permanent corrective action (long term).
 - e. Verification of corrective action.
 - f. Actions to prevent recurrence.

Further Requirements:

1. Warehouses will work with our Quality Assurance personnel to dispose of rejected material held at our facilities.



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2. Warehouses will compensate JBSS for costs associated with losses incurred due to noncompliant products.

Special considerations:

Non-conforming material as a result of mishandling at the Warehouse is subject to several possible dispositions depending on the nature of the non-conformance and Warehouse input, including

- a. Warehouse to sort at JBSS's designated facility at the Warehouse's expense (to avoid shutdown of production lines)
- b. Scrap at Warehouse's expense
- c. Return to Warehouse at Warehouse's expense
- d. Donate through JBSS-approved program.

JBSS reserve the right to charge back all costs resulting from Warehouse providing non-conforming product.

Section 25 - Internal and External Audits:

Warehouses shall have an audit system in place to verify and assess the operation and effectiveness of their food safety, pre-requisite programs, quality systems and GMPs, via internal and external (independent third party) audits.

Policy:

Audits provide a credible verification system to the entire food processing industry. Audits help identify nonconformities, which are processes that fail to conform to the requirements of a standard.

Following an audit, nonconformities can be addressed and corrected. This helps companies to establish formalized corrective actions, preventive measures and continuous improvement processes. It also helps ensure a company's food safety and quality management systems are robust and effective, thus increasing consumer confidence and safety throughout the supply chain.

John B. Sanfilippo & Son, Inc. reserves to right to audit Warehouse against this document at any time with notification.

Internal Audit Requirements:

1. Warehouses shall establish a formal documented internal audit program to evaluate processes and procedures.
2. Internal audits are to be supported by all levels of company management.
3. The Warehouse's internal audit program shall, at a minimum, cover Food Safety, SSOP, GMP programs and pre-requisite food safety and quality systems programs.
4. Warehouse's audit programs are to ensure the utilization of a cross functional team.
5. Warehouse's audit programs shall ensure internal persons designated to perform audits are trained and knowledgeable in each segment being audited.
6. Warehouse's audit programs shall address documentation relating to:
 - a. Frequency of audits
 - b. Programs audited
 - c. Facilities audited
 - d. Corrective actions and preventive measures needed
 - e. Documentation and record keeping



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External Audit Requirements:

1. Warehouses to JBSS are required to have an audit performed annually by an independent third party.
 - a. Global Food Safety Initiative (“GFSI”) recognized schemes are preferred
2. Warehouses are to perform corrective actions noted during an audit in the timeline stipulated in the audit.
3. Warehouses shall promptly submit the audit results to the JBSS Representative upon receipt.
4. Corrective actions taken against an audit are to be forwarded to JBSS. Any corrective actions not able to be completed within a thirty (30) days require notification to JBSS of the expected timeframe for completion, and then submission upon completion of the corrective action.
5. Annual audits are to be performed at the Warehouse’s expense.

Section 26 - Food Security / Food Defense:

Warehouses (domestic and foreign) shall develop, implement and document an effective food defense program to ensure food processing and food storage security.

Policy:

Food defense is not the same as food safety; Food defense activities and processes attempt to reduce the risk of intentional adulteration of the food supply.

Requirements:

Programs can be designed around the FDA or the USDA models.

1. Warehouse shall register each of their facilities in accordance with the FDA Bioterrorism Act.
2. The Warehouse's food defense plan shall perform a self-assessment to reveal risk and vulnerability.
3. A Warehouse's food defense plan shall consider the following:
 - a. A hiring policy with a pre-employment investigation.
 - b. Control of all entry and access points to prevent unlawful or unauthorized entry to the facility.
 - c. Identification of accountable personnel for each component of the food defense program.
 - d. Providing all staff with a standard procedure for alerting management about food security concerns.
 - e. Training personnel in food defense and employee security awareness, along with documentation of said activities.
 - f. Documenting audit results.
4. Stating the frequency that each component of the food defense program shall be audited.
5. The Warehouse's food defense program shall have documented audit results.
6. The Warehouse's food defense program shall have a documented crisis management plan for suspected or actual threats to product/facility security, or criminal activity.
7. The Warehouse will implement a comprehensive cybersecurity system to protect all company, contact, and product data belonging to both the Warehouse and John B.



Warehouse Expectations

Sanfilippo & Son, Inc., ensuring the confidentiality, integrity, and security of this information.



8.

Revision History:

Date	Revised/Reviewed By	Reason/Changes