

Morton Salt, Inc.

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Morton Salt, Inc. & Windsor Salt Ltd.



Rittman, Ohio Food Safety and Quality Information Packet

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Introduction

With the growing number of individual questionnaires, Morton Salt, Inc. and Windsor Salt Ltd. have prepared this packet of information to meet our customers' food safety, quality and regulatory requirements. The following information is based on our current processes for the manufacture of human food grade salt products. We kindly ask our customers to use this packet in place of completion of individual forms. Thank you for considering Morton Salt, Inc. and Windsor Salt Ltd.

This packet is only applicable to the following human food grade products produced at Morton Salt's manufacturing facility located in Rittman, Ohio:

- Culinox 999[®] Salt
- TFC 999® Salt
- Extra Fine 200 Salt
- Flour Salt
- H.G. Blending Salt
- TFC H.G. Blending Salt
- Iodized Table Salt

- Plain Table Salt
- Purex[®] Salt
- / TFC Purex® Salt
- Top Flake Coarse Salt
- Top Flake Topping Salt
- Top Flake Fine Salt

For quality and food safety information regarding products not listed above, please reach out to us directly at TECHNICALDOCUMENTS@mortonsalt.com.

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Supersedes: 06/19/2023 Sr Mgr Corporate External FSQR & Audit

Signature:

Issued By: Rachel Halphen

FSQR Lead

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Signature:

Site Overview and Contact Information

The Morton Salt – Rittman, Ohio location began producing salt in early 1898 as Ohio Salt. In 1940, Morton Salt acquired the facility. The facility contains an underground brining operation from which salt is pumped and evaporated in plant processing equipment. This production facility is approximately 540,000 square feet and contains food grade, pharmaceutical and agricultural lines that process and package salt products.

Morton Salt Corporate Information

Address: 444 West Lake Street, Suite 2900

Chicago, Illinois 60606, USA

Phone: 312-807-2002

Email: BuyIndustrial@mortonsalt.com

Website: www.mortonsalt.com

Morton Salt - Rittman Facility Information

Address: 151 South Industrial Avenue

Rittman, Ohio 44270, USA

Phone: 330-925-3015

Technical Documentation

Name: Technical Documents Team

Phone: 312-807-2000

Email: <u>TechnicalDocuments@mortonsalt.com</u>

Sr Mgr Corporate External FSQR & Audit

Name: Mark Reynolds Phone: 312-807-2000

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FSQR Lead (Recall Contact)
Name: Rachel Halphen

Phone: 312-807-2000

Email: TECHNICALDOCUMENTS@mortonsalt.com

Director of B2B Food Sales

Name: Gary Bartuska

Email: foodb2bus@mortonsalt.com

24-Hour Emergency Contact

Phone: 312-807-2000

Overview of Quality and Food Safety Programs

At Morton Salt, we are committed to providing high quality products that meet or exceed the quality and food safety standards expected by our customers.

To ensure these expectations are fulfilled, we operate all our food manufacturing facilities according to the following regulatory requirements and internationally recognized quality and food safety standards:

- U.S. Federal Food, Drug and Cosmetic Act, and all regulations and amendments thereto, including the Food Additives Amendment and the Food Safety Modernization Act;
- Health Canada Food and Drug Act and regulations and amendments thereto;
- BRC Global Standard for Food Safety: Issue 8.

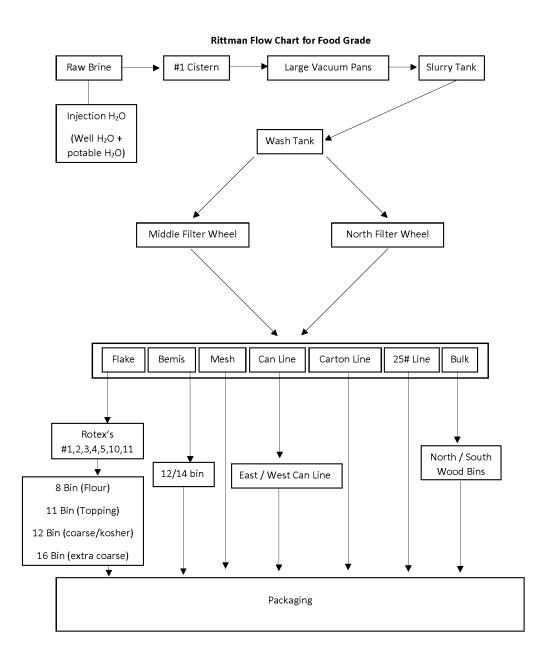
Specific programs in place to support the above requirements include, but are not limited to:

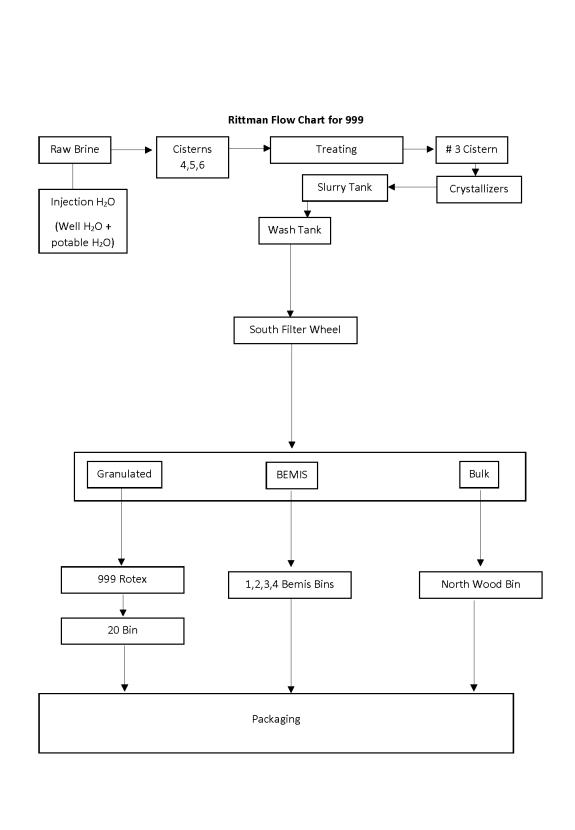
- Senior Management Commitment
- Food Safety / HACCP Plans
- Food Safety and Quality Management Systems
- Site Standards and Good Manufacturing Practices
- Product and Process Controls
- Personnel and Training
- Food Defense and Food Security.

We are also committed to building relationships and trust with our customers through the following activities:

- Review of Morton's quality and food safety programs in regards to customer expectations;
- Mutually agreed upon corrective actions to address any opportunities for improvement identified during customer audits or quality incidents with product shipped to the customer;
- Adherence to the specifications outlined in our customer supply agreements and contracts.

Flow Chart and HACCP/Food Safety Plan Summary





Copies of the Food Safety / HACCP programs are not distributed outside of the organization due to the complexity and proprietary nature of the information. The following information is provided in an effort to remain responsive to our customers' need for information:

PC1 (CCP) – Metal Detector:

Limits: Product is dischagred when challanged with a maximum test piece size of: Ferrous-2.0 mm Non-Ferrous-2.5 mm Stainless Steel-2.5 mm A maximum of three (3) diverts per two (2) hours of production.

Test Frequency: Testing is conducted at production start and end, after repair, maintenance and adjustments. Corrective Action: Failure results in product hold and investigation.

PC2 (CCP if no metal detector on line) – Final Magnet:

Limit is established as a loss of 23% and is tested annually, and unusual findings, checks are preformed by trained operators. Bulk loading checks are conducted after each trailer is loaded. Failure results in product hold and investigation.

CP – Final Scalping Screen:

(USS 12 mesh) Limit: an unusual amount or type or material larger than the screen openings. Four hour check are conducted by trrained operators that identify the screen is fully intact and there are no unsuall findings. Failure results in product hold and investigation.

Additional hazards are controlled by Prerequisite Programs (PRP) as part of the site's Food Safety Programs.



Additional Documents Available Upon Request

Please contact the Technical Documents Team or Customer Quality Manager for the following documents:

- Allergen Statement
- Business Continuity Statement
- Conflict Minerals Statement
- Continuing Product Guarantee
- Country of Origin Statement
- Diacetyl Statement
- Food Fraud Statement
- Food Grade Products Compliance Standard
- Food Packaging Materials Statement
- FSVP Statement
- GFSI Certificate and Audit Report
- HACCP / Preventive Controls Statement

- HALAL Statement
- Kosher Certificate
- Lot Code Explanation
- Notification of Change Statement
- Organic Statement
- Partially Hydrogenated Oil (PHO) Statement
- Pesticide Statement
- Proposition 65 Statement
- Quality Program Statement
- Ready to Eat Statement
- Safety Data Sheet
- / Toxic Substance and Control Act (TSCA) Status

When requesting additional documents, please ensure that the manufacturing site and specific product for review is referenced in the request.

Frequently Asked Questions

Cleaning and Sanitation

Master Cleaning Program Does the facility have a written master cleaning	Cleaning Equipment Storage Does the facility have procedures in place to store
program established to ensure that all critical	cleaning equipment in an adequate way to prevent
elements are adequately addressed to prevent	cross-contamination?
cross-contamination?	☑ Yes ☐ No
☑ Yes ☐ No	Pro Operational Cleaning Inspection
Cleaning Chemicals	Pre-Operational Cleaning Inspection Does the facility perform pre-operational visual
Does the facility have programs in place to ensure	inspections to confirm that equipment is cleaned
the concentration of sanitizer and cleaning chemicals	before start-up of production?
is verified and complies with the manufacturer's	✓ Yes □ No
recommended concentrations?	/
Not Applicable – The food grade lines at the site only	Cleaning Effectiveness Verification
utilize dry cleaning procedures; Chemicals are not	Does the facility have a written Environmental
used in the cleaning process.	Monitoring Program (EMP) established to ensure the
	effectiveness of cleaning procedures is monitored?
	☑ Yes ☐ No
	We only swab in the area where they are packing the pepper. We do not swab in salt processing or packaging areas as the risk is remote for salt.
	swab in Sait processing or packaging areas as the risk is remote for Sait.
Continuous Improvement and Complaints)//
Continuous Improvement and Complaints	a 344:
Management of Change	Continuous Improvement Procedures
Is a Management of Change program in place to	Does the facility have a written program in place to
mitigate risk associated with changes to facilities,	continually improve upon its products and
operations or product?	processes?
	☑ Yes ☐ No
Are hazards associated with changes identified and	Customer Complaints Procedures
mitigated?	Does the facility have a written program in place to
☑ Yes ☐ No	effectively respond to customer complaints and
	concerns, and to minimize the number of recurring
Is there a procedure in place to notify customers of	complaints?
major changes to materials or processes?	☑ Yes ☐ No
☑ Yes ☐ No	
	Does the facility track and trend complaints to
	identify improvement, as well as strengths and

weaknesses?

☑ Yes □ No

Facility, Grounds and Operations

Grounds and Building Exterior	Site only produces low risk products and allergens
Are programs in place to ensure the plant grounds	are not present within the production environment
and building exterior are maintained so as to protect	therefore not requiring a hygienic zoning program.
against pests and to avoid contamination of product	
or of the facility?	Maintenance Programs
✓ Yes □ No	Does the facility have an established corrective
2.63	maintenance program to ensure repairs are properly
Building Interior	completed?
Are the interiors of the building designed,	☑ Yes □ No
constructed and maintained so as to facilitate Good	E 163
Manufacturing Practices (GMPs)?	Does the facility have an established corrective
	maintenance program to ensure repairs are properly
☑ Yes □ No	completed?
Are programs in place to ensure interior areas and	☑ Yes □ No
housekeeping practices maintained to ensure	
cleanliness of the facility and to prevent product	Walkways, Permanent Ladders and Conveyors
contamination?	Are all walkways, permanent ladders and conveyors
☑ Yes □ No	over exposed products or open bins of ingredients
	shielded so as to protect product and packaging
Utilities Management	materials from possible contamination?
Does the facility have programs to ensure safe	Not applicable. Walkways, ladders and conveyors are
provision of utility services in the food production	only utilized over covered/unexposed product areas.
area?	8
☑ Yes □ No	Staff Facilities
₩ Tes □ NO	Are programs in place to ensure break areas, locker-
Environment and Utanaila	rooms, restrooms and wash-stations are maintained
Equipment and Utensils have designed and	in a clean and sanitary condition?
Have equipment and utensils been designed and	☑ Yes ☐ No
constructed so as to prevent contamination of food	E 163
products?	Container Labelling
☑ Yes □ No	Are programs in place to ensure all containers for
	1 3 1
Hygienic Zoning	manufacturing use, including trash receptacles and
Does the facility have an established hygienic-zoning	spray bottles, are properly and legibly labelled and
program designed to reduce the potential for cross-	specify the intended contents?
contamination of material and products?	☑ Yes □ No
☐ Yes ☑ No	

Food Safety / HACCP Systems	
Food Safety / HACCP Plan Does the facility have a documented Food Safety and/or HACCP plan that has been signed by senior management? ☑ Yes □ No Was the Food Safety / HACCP plan developed by a	Food Safety / HACCP Plan Review Does the facility have documented procedures in place to monitor and record Preventive Controls and/or Critical Control Points? ☑ Yes □ No
multidisciplinary team that has been formally trained in HACCP and food-safety principles? ☑ Yes □ No	Does the facility have a documented program for reviewing the Food Safety / HACCP plan at a
Has a Process Flow Diagram been created for each product, indicating the Preventive Controls and/or Critical Control Points? ☑ Yes □ No	predetermined frequency? ☑ Yes □ No Food Safety Plans are reviewed minimally at an annual frequency.
Was the Food Safety / HACCP plan created following the US FDA Food Safety Plan requirements and/or the 7 HACCP principles? ☑ Yes □ No	Does the facility carry out verification activities to confirm the efficiency and suitability of the Food Safety / HACCP plan? ☑ Yes □ No
Food Security/Defense and Food Fraud	
Food Security/Defense Program Does the facility have a written food security/defense program based on risk or threats established to prevent intentional harm to employees, products and processes? ☑ Yes □ No Is the food security/defense program reviewed at least annually?	Food Fraud Program Does the facility have a written food fraud program based on vulnerability assessment established? ☑ Yes □ No Does the program list and define all control measures, frequency and responsibilities throughout the chain of custody? ☑ Yes □ No
☑ Yes □ No	
Foreign Material Control	
Foreign Material Controls Does the facility have documented programs in place to ensure the detection and/or removal of foreign objects?	Are sieves or screens used as a method of foreign material detection and/or removal? ☑ Yes □ No
✓ Yes □ No	Are metal detectors used as a method of foreign material detection and/or removal? ☑ Yes □ No

Are magnets used as a method of foreign material detection and/or removal?	Is a product rejection log maintained, including analysis and corrective actions?
☑ Yes ☐ No	☑ Yes □ No
Is optical sorting equipment used as a method of foreign material detection and/or removal? ☐ Yes ☑ No Is x-ray equipment used as a method of foreign	Metal and Utensils Control Does the facility have specific controls in place for sharp metal utensils that pose a potential risk to health in the event of contamination? ☑ Yes □ No
material detection and/or removal? ☐ Yes ☑ No Is other physical separation equipment used as a method of foreign material detection and/or removal?	Lubricant Control Does the facility have programs in place to ensure only food-grade lubricants are used in all food product contact surfaces? ☑ Yes □ No
☐ Yes ☑ No	
Good Laboratory Practices (GLPs)	
In-House Testing Programs Does the facility have a Good Laboratory Practice program established to ensure that only approved official test methods or established methods that have been validated and verified are used? ☑ Yes □ No Does the facility have comprehensive testing programs and procedures developed with all important elements included? ☑ Yes □ No	If the facility tests for pathogens onsite, are strict control measures established? Not applicable. Pathogen testing is not conducted onsite. Are programs in place to ensure non-conforming results are tracked and corrective actions documented? ☑ Yes □ No Third Party Laboratories If third party laboratories are used to perform critical analysis, are the laboratories accredited and operated in accordance with ISO 17025? ☑ Yes □ No
Good Manufacturing Practices (GMPs)	
GMP Program Does the facility have a documented Good Manufacturing Practices (GMP) program established? ☑ Yes □ No	Hand-Washing Facilities Does the facility provide adequate hand-washing facilities? ☑ Yes □ No

Employee Illness and Communicable Disease Does the facility have documented procedures in	
	Does the facility keep record of the audit results and
place for the control of employee (including	any corrective actions?
contractors and visitors) illness and communicable	☑ Yes ☐ No
disease that may result in pathogen transmission by	E 163 🗆 NO
food?	Glass and Brittle/Hard Plastic Control
☑ Yes □ No	Does the facility have a documented procedure on
	the control of glass and brittle/hard plastic use,
Waste Management	specifically banning the usage of glass or brittle/hard
Has the facility implemented a waste management	plastic except where use is essential?
program?	☑ Yes □ No
☑ Yes ☐ No	
	Does the facility maintain a list of all essential glass
GMP Program Adherence	and brittle/hard plastics within the facility, including
Does the facility have programs in place to ensure	all lights, glass and brittle/hard plastics in
that all employees, visitors and contractors are	production, warehousing and storage area?
	. ,
knowledgeable and comply with GMP	☑ Yes □ No
requirements?	//
☑ Yes □ No	Chemical Control
	Does the facility have written procedures in place to
GMP Inspections	control the use, storage and handling or chemicals to
Does the facility conduct self-audits on GMP	prevent chemical contamination?
elements at a predetermined frequency?	☑ Yes □ No
☑ Yes □ No	
Monthly GMP inspections are conducted at the site.	
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Pest Management Program	1200
(/ \ \	
	300
Pest Control Program	Inspection Reports
Pest Control Program Does the facility have an established nest control	Inspection Reports Does the facility have written programs in place to
Does the facility have an established pest control	Does the facility have written programs in place to
Does the facility have an established pest control program with a service that is provided by either a	Does the facility have written programs in place to ensure that service reports or pest-control
Does the facility have an established pest control program with a service that is provided by either a license and certified Pest Control Operator or a	Does the facility have written programs in place to ensure that service reports or pest-control inspection records are kept on file and are current?
Does the facility have an established pest control program with a service that is provided by either a license and certified Pest Control Operator or a licensed, insured and certified Pest Control Service?	Does the facility have written programs in place to ensure that service reports or pest-control
Does the facility have an established pest control program with a service that is provided by either a license and certified Pest Control Operator or a	Does the facility have written programs in place to ensure that service reports or pest-control inspection records are kept on file and are current? ☑ Yes □ No
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Does the facility have an established pest control program with a service that is provided by either a license and certified Pest Control Operator or a licensed, insured and certified Pest Control Service? ☑ Yes □ No	Does the facility have written programs in place to ensure that service reports or pest-control inspection records are kept on file and are current? ☑ Yes ☐ No Pest Control Devices
Does the facility have an established pest control program with a service that is provided by either a license and certified Pest Control Operator or a licensed, insured and certified Pest Control Service? ☑ Yes ☐ No Pesticides	Does the facility have written programs in place to ensure that service reports or pest-control inspection records are kept on file and are current? Yes No Pest Control Devices Are pest control devices adequately placed
Does the facility have an established pest control program with a service that is provided by either a license and certified Pest Control Operator or a licensed, insured and certified Pest Control Service? Yes No Pesticides Does the facility keep Safety Data Sheets (SDS),	Does the facility have written programs in place to ensure that service reports or pest-control inspection records are kept on file and are current? ☑ Yes ☐ No Pest Control Devices Are pest control devices adequately placed throughout the facility to avoid pest infestation as well as contamination?
Does the facility have an established pest control program with a service that is provided by either a license and certified Pest Control Operator or a licensed, insured and certified Pest Control Service? Yes No Pesticides Does the facility keep Safety Data Sheets (SDS), handling and mixing procedures, and pesticides labels on file?	Does the facility have written programs in place to ensure that service reports or pest-control inspection records are kept on file and are current? ☑ Yes ☐ No Pest Control Devices Are pest control devices adequately placed throughout the facility to avoid pest infestation as
Does the facility have an established pest control program with a service that is provided by either a license and certified Pest Control Operator or a licensed, insured and certified Pest Control Service? ☑ Yes ☐ No Pesticides Does the facility keep Safety Data Sheets (SDS), handling and mixing procedures, and pesticides	Does the facility have written programs in place to ensure that service reports or pest-control inspection records are kept on file and are current? ☑ Yes ☐ No Pest Control Devices Are pest control devices adequately placed throughout the facility to avoid pest infestation as well as contamination? ☑ Yes ☐ No
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Does the facility have an established pest control program with a service that is provided by either a license and certified Pest Control Operator or a licensed, insured and certified Pest Control Service? ☑ Yes ☐ No Pesticides Does the facility keep Safety Data Sheets (SDS), handling and mixing procedures, and pesticides labels on file? ☑ Yes ☐ No Is the pest controller's chemical application license	Does the facility have written programs in place to ensure that service reports or pest-control inspection records are kept on file and are current? ☑ Yes ☐ No Pest Control Devices Are pest control devices adequately placed throughout the facility to avoid pest infestation as well as contamination? ☑ Yes ☐ No Pest Activity Trend Analysis Does the facility have programs in place to ensure
Does the facility have an established pest control program with a service that is provided by either a license and certified Pest Control Operator or a licensed, insured and certified Pest Control Service? ☑ Yes ☐ No Pesticides Does the facility keep Safety Data Sheets (SDS), handling and mixing procedures, and pesticides labels on file? ☑ Yes ☐ No Is the pest controller's chemical application license current and readily available?	Does the facility have written programs in place to ensure that service reports or pest-control inspection records are kept on file and are current? ☑ Yes ☐ No Pest Control Devices Are pest control devices adequately placed throughout the facility to avoid pest infestation as well as contamination? ☑ Yes ☐ No Pest Activity Trend Analysis Does the facility have programs in place to ensure pest activity trend analysis is reviewed and
Does the facility have an established pest control program with a service that is provided by either a license and certified Pest Control Operator or a licensed, insured and certified Pest Control Service? ☑ Yes □ No Pesticides Does the facility keep Safety Data Sheets (SDS), handling and mixing procedures, and pesticides labels on file? ☑ Yes □ No Is the pest controller's chemical application license	Does the facility have written programs in place to ensure that service reports or pest-control inspection records are kept on file and are current? ☑ Yes ☐ No Pest Control Devices Are pest control devices adequately placed throughout the facility to avoid pest infestation as well as contamination? ☑ Yes ☐ No Pest Activity Trend Analysis Does the facility have programs in place to ensure

Process Control Temperature Control Does the facility have established temperature **Finished Product Release** control measures for all temperature-sensitive Does the facility have documented procedures for products or ingredients? release of finished product to ensure proper release? Not applicable – products are not temperature ✓ Yes □ No sensitive. **Operations Control Allergen and Sensitive Ingredient Controls** Does the facility have adequate operations controls Does the facility have a written allergen in place with work instructions and specifications management control procedure established to documented? prevent cross-contact from allergenic material to ✓ Yes □ No non-allergenic material? ✓ Yes ☐ No **Quantity Control** Allergens are not used in the production of products Does the facility have documented programs in place at the site. to ensure appropriate weight/volume labelling by conducting weight, volume, and/or number control Does the facility have a written sensitive ingredient checks at a predetermined frequency? program in place through the chain of custody to ✓ Yes □ No prevent cross-contact contamination? □ No ✓ Yes **Calibration Program** Are all instruments used that are critical to product **Control of Non-Conforming Product** safety, quality, or legality calibrated on a Does the facility have programs in place to identify, predetermined frequency based on risk? segregate and control the release of non-conforming ✓ Yes □ No product? ✓ Yes □ No Certificate of Analysis (COA) Is the facility capable of providing a Certificate of **Corrective and Preventive Actions (CAPA)** Analysis (COA) attesting to the quality of the supplied Does the facility have written corrective and material in accordance to the specified quality and preventive action (CAPA) programs for tracking nonfood-safety attributes for each lot of delivered conformances to ensure they are corrected in a material? timely manner? √ Yes □ No ✓ Yes □ No **Product Identification and Labelling** Does the facility have programs in place to clear line

Product Identification					
Does the facility have a written program indicatir					
how each p	product is ide	ntified?			
✓ Yes	□ No				
Product La	belling				
Does the fa	acility have a l	abelling program in place?			
✓ Yes	□ No				

Does the facility have programs in place to clear line of labels during product changeovers?

☑ Yes ☐ No

Are checks in place to ensure the correct product, equipment and labels are used in an appropriate

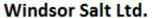
☑ Yes ☐ No

manner?



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Quality Management System	
Management Commitment Does the facility's management team show commitment to quality in concrete ways (i.e. documented policies, quality manuals, provision of adequate resources, etc.)? ☑ Yes □ No	Training Programs Does the facility have a documented training program, which includes details of the type and frequency of training for all staff?
Document Control System Does the facility have an established document	✓ Yes □ No
control procedure? ☑ Yes ☐ No	Regulatory Compliance Is the facility registered with the United Stated FDA? ☑ Yes □ No
Are programs in place to ensure that all the documents needed to demonstrate the quality management system in place kept up to date? ☑ Yes ☐ No Record Control System Does the facility have a documented record control procedure to ensure all food-safety and or quality records are maintained, so that evidence of legality and conformity to requirements is available? ☑ Yes ☐ No	System Verification Audits Does the facility operate an annual internal auditing program through which it can verify that the foodsafety and quality plan is being operated effectively? ☑ Yes □ No Does the facility participate in Third Party FoodSafety certification audits? ☑ Yes □ No
Receiving, Storage and Distribution	A Maria A.
Receipt of Incoming Materials Does the facility have a documented procedure on the receiving of incoming materials? ☑ Yes □ No	Storage of Finished Goods Does the facility have documented procedures in place to ensure adequate management and control of finished product during storage and distribution? ☑ Yes □ No
Raw Materials and Packaging Identification Does the facility have documented procedures in place to ensure all raw materials and packaging materials are identified and clearly labelled? ☑ Yes □ No	Transportation Inspection and Verification Are programs in place to ensure vehicles, carriers and transporters are inspected for loading, palletizing, and traceability to ensure the quality and safety of the products? ✓ Yes □ No

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Are programs in place to ensure that all vehicles and trailers delivering products from the facility are properly sealed and/or secured from dispatch through delivery?	Is a trailer inspection form completed prior to shipment? ☑ Yes □ No
✓ Yes □ No Are programs in place to ensure that all vehicles and trailers delivering product from the facility are appropriately cleaned out and inspected to prevent contamination from potential foreign objects or chemicals, and that all flows, walls and ceilings are clean and sanitary? ☑ Yes □ No	Supplier Approval Program Does the facility have an established supplier approval program for all raw materials and packaging materials, clearly defining processes by which a supplier is approved? ☑ Yes ☐ No Does the facility have a Foreign Supplier Verification Program (FSVP) for all foreign suppliers? ☑ Yes ☐ No
Traceability and Recall Programs	
Traceability Program Does the facility have a written traceability procedure established for all ingredients, product packaging, and finished products? ☑ Yes □ No Does the facility have programs in place to ensure all raw materials, packaging materials, work in progress, and finished products are clearly labelled and identified in such a way that they can be easily tracked? ☑ Yes □ No	Does the facility have the ability to identify, track and locate 100% of raw materials, ingredients, and/or packaging materials to finished product sold within 4 hours? ☑ Yes □ No Policy allows for 100% +/- 2% traceability within 4 hours without a corrective action. Product Recall Program Does the facility have a documented product recall program that defines the steps, personnel and communication plans for effective execution? ☑ Yes □ No Does the facility have a written program to ensure the product traceability and recall procedures are tested at least annually and that all records are maintained? ☑ Yes □ No