1. OBJECTIVE

1.1. The purpose of this program is to establish written guidelines that are to outline the requirements and steps that must be taken in the event that one or more Namar Foods products need to be recalled on the grounds that the product is unsafe. It can also be used when recalling or withdrawing foods for other reasons. Moreover, the system allocates responsibilities and defines the activities associated with a product recall or market withdrawal in a prompt, orderly and efficient manner.

1.2. The aim of this plan is to:

1.2.1. Stop the distribution and sale of the affected product.
1.2.2. Effectively notify Namar Foods management, customers and appropriate authorities of the recall.
1.2.3. Effectively and efficiently remove from marketplace any product that is potentially unsafe.
1.2.4. Effectively retrieve product from customer warehouses, retail stores and/or consumers.
1.2.5. Effectively dispose of the unsafe recall food.
1.2.6. Implement corrective and preventive action plan to prevent reoccurrence of the problem.

2. SCOPE

This procedure will be applied in the event it is necessary to recall or withdraw stock from customer warehouses, retail stores or consumers.

3. FREQUENCY:

Mock recalls are to be performed twice per year, one trace forward and one trace backwards.
Recalls, Withdrawal and Stock recovery: as needed

4. RECALL DEFINITIONS:

4.1. FDA (food and drug administration) and FSIS define product recalls into one of the following classifications:

4.1.1. Class I Recall:

An emergency in which there is a reasonable probability that the use of, exposure to, a volatile product will cause serious adverse health consequences or death

4.1.2. Class II Recall:

A priority situation, for cases in which use of or exposure to a product may cause temporary or medically reversible adverse health consequences or where the probability of serious adverse health consequences is remote.

4.1.3. Class III Recall:

Employed when use of, or exposure to the product is not likely to cause adverse health consequences. In addition to recalls the following actions are available to regain control of product already in distribution.

4.2. Market withdrawal:

Used when there is a minor violation that is not subject to legal action by FDA or FSIS, or when the company wished for other reasons to retrieve product form distribution. For example, the product does not meet the company's internal specifications.

4.3. Stock Recovery:

Employed in recovering product that has not been placed in retail distribution channels but is still under the manufacturer's direct control on its own premises or in warehouse from which the company can assure there will be no distribution.

5. RESPONSIBILITIES:

5.1. CEO

5.1.1. The CEO bears the ultimate responsibility for determining the necessity for a product recall. This decision should be made with the input of appropriate organizational personnel and legal counsel. Upon being informed that Namar Foods Product poses a potential hazard to consumers, the CEO of the company will summon the Recall Team to determine the necessity for a product's recall, its interim classification and depth.

5.1.2. Instructs the recall coordinator to initiate the Trace/Recall Program.

5.1.3. Maintains contact with legal counsels throughout the recall process. Only the CEO is to maintain issue statements or release communications to the media, relative to the situation, if it should become necessary.

5.2. Recall Coordinator (Director of FSQ/R&D)

5.2.1. The Recall Coordinator is responsible for evaluating the potential hazards associated with the product in question

5.2.2. Investigating the suspected product and the events leading to its suspected status.

5.2.3. Prepares a formal recall report to present to the president and the recall team

5.2.4. Directly interacts with the FDA Department

5.2.5. Informs the Namar Foods Management Team, presents all factual data regarding the suspected product, and keeps them informed as events unfold regardless of whether a recall will become necessary.

5.2.6. Obtains and interprets all pertinent data and communicates directly with the President of the company and all other appropriate individuals involved in the Recall effort.

5.3. VP of Manufacturing / Operations Manager

5.3.1. is responsible for coordinating with the scheduler, warehouse clerk, production supervisor to locate the product in question, conducting and inventory of the products and ingredients within Namar Foods premises, gathering and providing the Recall Coordinator all relevant data regarding the product being recalled.

5.4. Sales Team

5.4.1. Based on purchase orders and the data provided by Shipping/Receiving/Distribution Department and other appropriate ordering and shipping forms, co-ordinates the sales staff to contact all clients who received shipment of suspected product(s).

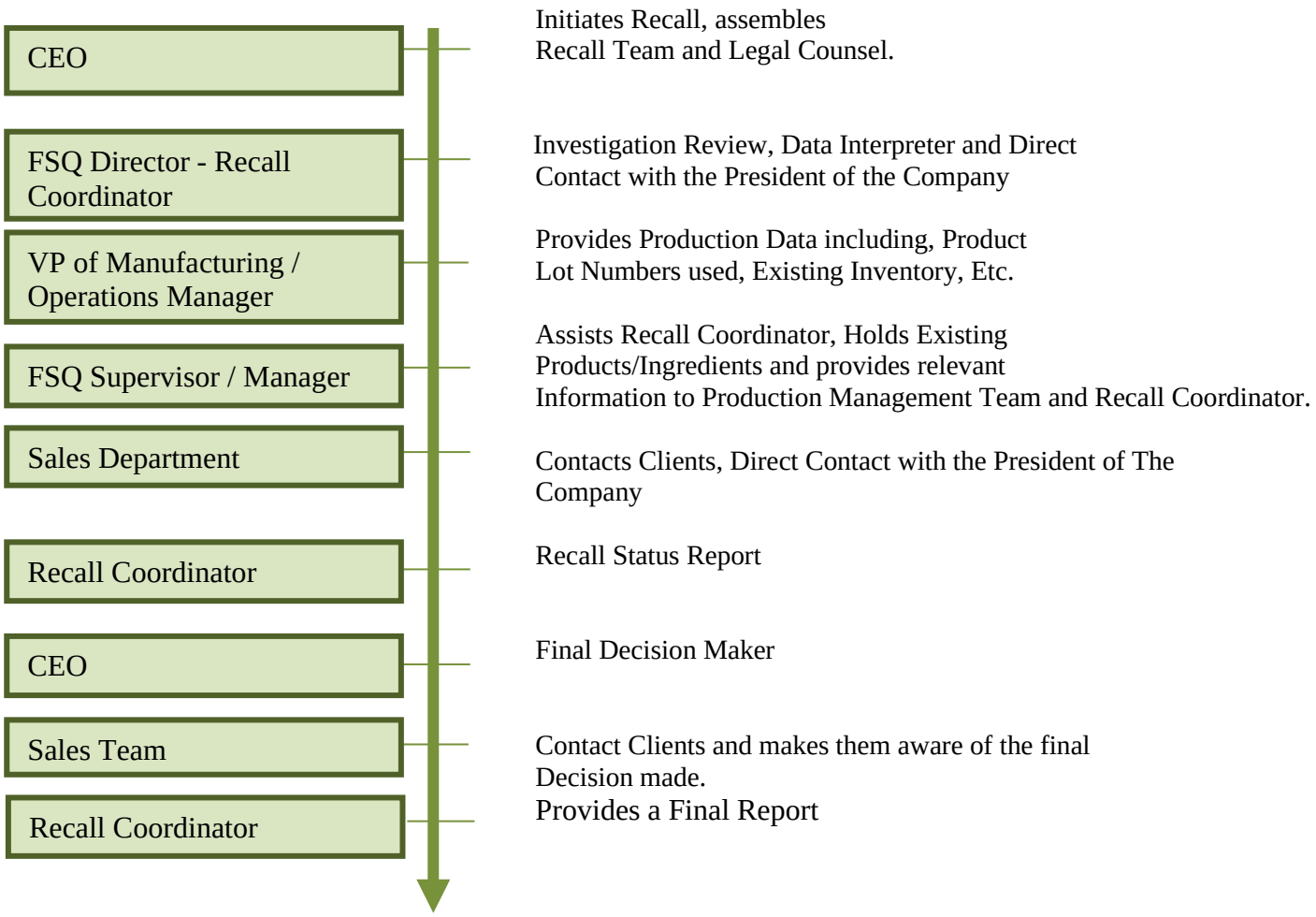
5.4.2. Informs clients of the Trace back/Recall effort in progress first by telephone and confirms with a Recall Letter and follows-up with telephone calls verifying the receipt of the recall letter.

5.4.3. FSQ Manager / Supervisor

Assists the Recall Coordinator (Director of FSQ/R&D) with the gathering of Quality Control data:

5.4.3.1. Incoming raw material and final product evaluations.
5.5.1.2. Quality Control Records
5.5.1.3. Process control (monitoring) data/logs (e.g. Ingredients tracking logs, Pre-Op/Operational Inspections etc.)

6. PROCEDURAL FLOW CHART



7. PRODUCT RECALL TEAM CONTACT INFORMATION

Name	POSITION	BUSINESS PHONE	MOBILE PHONE
Deborah Mitchell	CEO	(562) 531-2744 ext. 219	(310) 702-2770
Omar Vasquez	VP of Manufacturing	(562) 531-2744 ext. 228	(818) 371-1976
Mary Anne Cabrera	Director of FSQ/R&D	(562) 531-2744 ext. 222	(562) 488-4648
Alfonso Mendez	Operations Manager	(562) 531-2744 ext. 214	(626) 228-8262
James Mayhan	Maintenance Supervisor	(562) 531-2744 ext. 301	(818) 795-8623
Alicia Espino	Supply Chain Manager	(562) 531-2744 ext. 224	(562) 361-0423

FDA Regional	Regulatory	(949) 798-7714
CDPH – California Dept of Public Health	Local Regulatory Agency	(916) 558-1784
SCS Global S.	SQF Certification Body	(510) 452-8000
SQFI	GFSI Scheme	foodsafetycrisis@sqfi.com
Bruce Friedman Attorney	Legal Advisor	(310) 301-0959

8. PRODUCT RECALL PROCEDURES

8.1. It is Namar Foods policy that all products meet or exceed customer specifications before shipment. Products that do not meet specifications are put on hold. Product put on hold is analyzed and the appropriate action is taken.

8.2. If after shipment, a condition, as listed above, exists wherein a product recall, withdrawal, recovery or correction is considered the decision will made by:

- CEO of the Company

8.2.1. If the decision for a product withdrawal or recall is made, the customer, distributor, or broker will be immediately notified.

8.2.2. A product recall or withdrawal will receive immediate and total attention and will take precedence over all other activities.

8.2.3. CEO of the company will request a recall through the Recall Coordinator

8.2.4. Recall coordinator then sends out a recall notice via electronic mail, telephone or verbally to the production scheduler to initiate the tracing

of the product in question and gathering all relevant data.

8.2.5. Utilizing the description and the code date of the suspected product, the production scheduler then, obtains all the pertinent production data necessary as quickly and as accurately as possible, information to be obtained includes but it is not limited to the following:

8.2.6. Reason for recall

8.2.7. The total volume of finished product cases manufactured.

8.2.8. Affected product codes

8.2.9. Product(s) possibly involved and remaining inventory

8.2.10. Ingredient (s) involved and remaining inventory

8.2.11. Size, type and quantities of packages

8.2.12. Customers where the product was shipped to

8.2.13. Use form product recall information to collect all information.

8.2.14. Upon gathering all relating data, the production scheduler then submits it to the Recall Coordinator.

8.2.15. Ensures all questionable/affected products are placed on QA HOLD to prevent further distribution.

8.2.16. THE QA HOLD AREAS ARE THE DESIGNATED AREAS TO PLACE RE- CALLED PRODUCTS. IF THE AMOUNT OF RECALLED PRODUCT EXCEEDS THE HOLD SPACE, THE PRODUCT IS TO BE GROUPED TOGETHER, WRAPPED WITH BLUE WRAP AND IDENTIFIED WITH HOLD TAGS ON ALL FOUR SIDES OF EACH PALLET. HOLD PRODUCT IN A PLACE WHERE SPACE IS ADEQUATE.

8.2.17. If regulatory officials and or the media are involved, the CEO of the company will keep them informed of all activities and developments.

8.2.18. Recall Coordinator in Correlation with the Executive VP will review and interpret the collected data to the CEO of the company and serve as technical support.

8.2.19. Also, recall coordinator, together with representatives of production, sales, support staff, and if necessary, consultation from outside sources (legal advice, specialized technical), shall make recommendations for action.

8.2.20. Recall Coordinator provides a final written report to the CEO of the Company, and the recall team.

8.3. Sales Team

8.3.1. Based on purchase orders and the data provided by CEO and the Recall Coordinator, they then co-ordinate the sales staff to contact all clients who received shipment of suspected product(s).

8.3.2. Informs clients of the Trace back/Recall effort in progress first by telephone and confirms by the facsimile transmission or emailing of a Recall Letter and follows-up with telephone calls verifying the receipt

of the recall letter.

8.3.3. **If the customer is distributing the suspected product**(s), have the customer utilize the code date and their own appropriate shipping forms to determine the following information, and perform the following tasks as quickly and accurately as possible:

8.3.3.1. The current location(s) and total volume (cases, pallets, etc.) of all suspected product(s) within the client's cold storage dry storage and distribution center(s).

8.3.3.2. The total volume (cases) of suspected product(s) shipped and a list of affected clients. 8.3.3.3.The individual total volume (cases) of suspected product(s) shipped to each client.

8.3.3.4.Have the client(s) cease all further distribution of the suspected product(s). 8.3.3.5.Have the client(s) gather together and isolate all suspected product within their cold holding facility.

8.3.3.6.Sales Team and to the Customers (if necessary) Work out the necessary arrangement with the client(s) to return suspected product(s) to Namar Foods or dispose of it in an appropriate manner. If the decision is made to dispose of the suspected product(s), Disposal of product should be controlled and monitored, by Namar Foods and Regulatory Agencies. Photographic evidence thereof, or photos and landfill receipts provided by the client shall evidence and verify the appropriate disposal of the suspected product(s).

8.3.4. **If the customer is *not* distributing the suspected product(s),** have the client utilize the code date and/or purchase order and their own appropriate receiving forms to determine the following information and perform the following tasks as quickly and as accurately as possible.

8.3.4.1. The current location and total volume (cases, pallets, etc.) of all suspected product within the client's store.

8.3.4.2. The total volume (cases) of suspected product(s) sold at consumer level. 8.3.4.3.Have the client(s) cease all further distributing and use of the suspected product(s).

8.3.4.4. Have the client gather together and isolate all suspected product(s) within their store(s) and tag it, "Hold - Do Not Use."

8.3.4.5. Work out the necessary arrangements with the client to return the suspected product(s) to Namar Foods facilities.

8.3.5. Recall effectiveness checks may be carried out by telephone calls or personal visits as often as is necessary to accomplish their intended purpose. The objective of the follow-up is to verify that all the consignees are taking the appropriate actions and that all, or as much as is humanly possible, of the suspected product(s) has been accounted for.

8.3.6. Sales Team should ensure that the customer contact details are both up to date and available to all key members of the recall team. Contact details should either be in the recall program file or referred to in the texts of the recall file.

8.4. Product Recall Exit Meeting

8.4.1. Upon collecting all the relevant data involving the affected product (Quality/Production Records), it will be presented and interpreted by the Recall Coordinator to the CEO of the company, production and sales Team during at the exit meeting.

8.4.2. Upon reviewing and understanding the information provided by the Recall Coordinator to the CEO of the company, he will then make a final decision.

8.4.3. Once the CEO of the Company has made the final decision, the Sales Team will contact all customers involved and inform them of the decision made.

8.4.4. Certification Body SCS Global Services and SQFI must be contacted and informed within 24 hours upon identification of a food safety event that requires public notification. SQFI shall be notified at **foodsafetycrisis@sqfi.com.**

8.4.5. Finally, the Recall Coordinator prepares a written recall status report as well as a final report at the conclusion of the recall process to the recall team.

9. MOCK RECALL EXERCISES:

9.1. As a confirmation of our Recall efficiency, a Mock Recall is conducted internally twice a year, including an afterhours test.

9.2. Trace exercises will include practices for ingredients, food contact packaging materials, and the food manufacturing process. Traces will also alternate from forward (such as an ingredient or food contact packaging) to backward (from finished product back to an ingredient or food contact packaging material for each trace.

9.3. Mock Recalls are conducted the same serious manner as a real recall and should be carried out in an efficient manner

9.4. Trace exercise recovery must achieve 100% (±2%), within 2 hours, or the exercise must be repeated.

10. RECORDS

10.1. Product Recall Information

10.2. Mock Recall reports

11.0 Appendix A- List of Customers

History of Changes:

Revision	Date	Details of Changes	Revised by:
3	11/01/21	Revised contact information, updated for new Recall Coordinator and Operations Manager	MBCabrera
4	08/01/22	Added VP of Manufacturing and Appendix A – customer's contact list	MBCabrera
5	11/01/2023	Updated Section 7.0 – Contact information, new VP Appendix A – updated customer contact list	MBCabrera