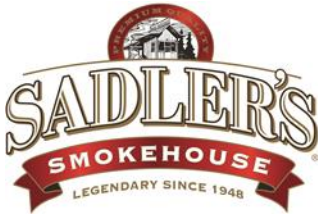


| | | |
|---|--|--|
|  | Recall Program for Sadler's Smokehouse, LLC, Est. #2088 | |
| | Program 24 | Effective: 5/1/2021 Replaces: 6/15/2020 |

RECALL TEAM

| Position | Name | Home Phone | Mobile |
|----------------------|---------------------------------------|--|----------------|
| President | Jeff Tobak | | 507-437-5255 |
| VP of Operation | Ross Flanagan | (903)646-3588 | (903) 646-0017 |
| Controller | Jason Eckert | | 903-392-2713 |
| Manager of QC & R&D | Adria Adams | | (979)777-2000 |
| VP of Marketing | Justin Robinson | 903-655-7562 | 903-445-6304 |
| VP of Sales | Matt Howe | | 651-587-1923 |
| Plant Manager | Saul Quintanilla | (903) 657-7029 | (903)392-0010 |
| Legal Representation | Jeffery Horner | (507) 437-5187 | |
| | Hormel Foods Corp. Risk Management | riskmanagement@hormel.com | |
| Public Relations | Justin Robinson | (903) 574-0505 | |
| • Back Up | Zenia Hanks | | 903-722-3841 |

TEAM DESIGNATION AND DUTIES

COORDINATING AND DIRECTING TEAM:

MEMBERS: Ross Flanagan, Adria Adams, and Saul Quintanilla

ADVISORS: Jeff Tobak (If needed.)

DUTIES:

- 1.) Coordinates team in evaluating pertinent facts to determine recall depth and appropriate public warning notice if necessary.
- 2.) Coordinate proposed actions.
- 3.) Designates recall points in appropriate geographical locations where product can be placed under control until disposition is made.
- 4.) Monitors the recall for effectiveness and prompt completion.
- 5.) Reviews recall evaluation upon completion

DISTRIBUTION AND INVENTORY TEAM:

MEMBERS: Ross Flanagan and Donna Fowler

DUTIES:

- 1.) Obtain distribution information.
- 2.) Determine on site inventory numbers.
- 3.) Provide information concerning shipments and consignees.

COLLECTION TEAM:

MEMBERS: Adria Adams and Obie Oliver

DUTIES:

- 1.) Obtain product samples in distribution channels when needed.
- 2.) Issue instructions for controlling procedures under recall at retail and food service levels for communication used to determine amounts of product inventoried.
- 3.) Provide for detention and seizure of recall products.
- 4.) Provide COORDINATING AND DIRECTING TEAM with records and control information.
- 5.) Submit additional samples if requested.
- 6.) Conducts recall effectiveness checks.
- 7.) Forward status reports and copies of reports received to COORDINATING AND DIRECTING TEAM.

SCIENCE AND INFORMATIONAL SUPPORT TEAM:

MEMBERS: Ross Flanagan, Adria Adams, Saul Quintanilla

DUTIES:

- 8.) Provide scientific and technical facts and evaluations to assist in recall decision-making.
- 9.) Obtain complete information concerning the recall product: amount of product, labeling, and product codes.
- 10.) Provide product tracking and research information.
- 11.) Initiate appropriate actions and controls over production and shipping of recall products at plant level.
- 12.) If additional sampling is required, issue priority sampling procedures to expedite lab findings.
- 13.) Furnish assistance and support as requested.
- 14.) Provide in plant evaluations.
- 15.) Inform Compliance Officers in charge, USDA, FDA, and appropriate State and Local officials and establish lines of communication and recall procedures.
- 16.) Notify GSFI Certified Body and Schemes
- 17.) Obtain copies if reports from Federal or State Inspectors, Compliance Officers, or local authorities of recalled products when company elects disposition of the product.
- 18.) Report evaluation findings directly to COORDINATING AND DIRECTING TEAM to expedite the collection of facts and information on plant procedures and corrective actions.

LEGISLATIVE AFFAIRS AND PUBLIC RELATIONS TEAM:

MEMBERS: Ross Flanagan, Jeff Tobak, Justin Robinson and Hormel Risk Management Team

Hormel Risk Management

DUTIES:

1. Release public information in accordance with FSIS policies and clearance procedures.
2. Provide advice on appropriate public warnings or notices when recall is considered.
3. Liaison information between FSIS and all public news media.

Immediate responsibilities of Team Members during Recall:

Coordinating and Directing Team:

- Call meeting of Recall Team informing them of the situation giving all details acquired.
- Set information teams in motion.
- Coordinate and focus all team effort.

Distribution and Inventory Team

- Stop all shipments of all products in question and coordinate return of the questionable product.
- Determine distribution status of product.
- Determine exact amount of suspect product.

Science and Informational Team

- Prepare lot identification information.
- Obtain control of recall product on site.
- Halt Production of related product.
- Ensure no product is destroyed or disposed of.
- Obtain and interpret product analysis.
- Communicate with FSIS or other regulatory government agencies.

Legislative Affairs and Public Relations Team

- Consult on legal implications.

Collection Team

- Notify sales managers and brokers.
- Relay information about lot designations and identification of suspect product.
- Mobilize salesmen and brokers to aid in pickup of suspect product from retail customers.
- Aid in contacting customers.

Hazard Evaluation

Questions the team should first address:

- How did the problem come to our attention?
- What is the reliability of the source of the information?
- Has disease or injury resulted from the product in question?
- What is the degree or scope of the hazard?
- How vast are the consequences of the hazard?

Recall Procedure:

1. Once the scope and depth of the problem have been determined, contact the FSIS or FDA concerning suspect product within 24 hours.
2. Determine strategy:
 - a. Consider results of the hazard evaluation process.
 - b. Compile codes, label names and other ways the suspect product may be identified.
 - c. Where has the product been distributed (Exposure)?
3. Once a strategy has been established the plan should be submitted to USDA for approval. Public warning may be necessary if all other means of obtaining suspect product proves to be inadequate or if product has already reached consumer level.
4. Inventory/Distribution department should relay pertinent information regarding affected lot numbers to all sales and marketing personnel. Sales persons must be given correct lot numbers and a complete description of the suspect product. Each sales person will then contact their respective stores and freeze suspect product in inventory and, if necessary, physically remove product from showcase.
5. Records reflecting the progress of the recall should be kept in detail.
6. Contact GFSI Certified Body and GFSI Schemes***
7. Once the recall plan is in action, follow up reports should be filed with the USDA. Reports should indicate the following:
 - a. Number and type of customers notified.
 - b. Number of customers that have responded.
 - c. Number that have not responded.
 - d. Quantity of product returned and in possession.
8. Once all suspect products have been recovered, or USDA determines there has been a reasonable effort on the part of Sadler's Smokehouse, the recall may be halted.

***Note: SQF and FSNS must be notified of the Recall.

DEFINITIONS

Types of recall

RECALL: The correction in the field, or removal of products from the market place that are contaminated, adulterated, misbranded, and are candidates for seizure/condemnation or other legal action by the federal/state government.

*** “Recall” has special legal significance in insurance and product liability matters; therefore it should **ONLY** be used in situations where a federal/state statute or regulation has been violated.*

MARKET WITHDRAWAL: Removal of contaminated or below quality products not in violation of federal/state regulations from the market.

*** This will not subject the company or product to legal action.*

STOCK RECOVERY: Removal of contaminated or below quality products not in violation of federal/state regulations that have not left the direct control of the manufacturer or primary distributor.

REASONS FOR RECALL/WITHDRAWAL

CONTAMINATION: (non-legal term) Impure or unclean. Implies the product has spoiled because of natural reactions to environmental conditions or has come into contact with dirt or foulness from an outside source.

MISBRANDED: (legal term) A food product fails to comply with applicable federal/state labeling or compositional standards.

Ex. Our meat products will be considered misbranded if it fails to carry specific approval granted by Standards and Labeling division of the Food Safety and Inspection service for both its label and formula.

ADULTERATION: A (legal term) Food product fails to comply with applicable federal/state health or safety standards. Considerations of adulteration include: poisonous or deleterious substance, and unauthorized food additive, an unavoidable contaminant, pesticide in excess of established action or tolerance levels.

TOLERANCE LEVEL: level permissible for an added poisonous or deleterious substance, unavoidable contaminant, or food additive in a food product (phosphates.)

ACTION LEVEL: The level of contamination at which a product will become subject to regulatory action including seizure or condemnation.

CLASSES OF RECALL

RECALL CLASSIFICATION: The numeric designation of the relative degree of hazard to public health associated with the product being recalled.

Class I: A situation where product in question may cause serious adverse health consequences. Classic examples are products contaminated with botulin and trichinae.

Class II: A situation where product may cause temporary adverse health consequences, serious health consequences are remote. Most common examples are products with undeclared use of FD&C Yellow No. 5 and products slightly exceeding tolerance levels for toxic substances.

Class III: A situation where the product is not likely to cause adverse health consequences. An example is misbranded product.

***Note: Recall classification will determine if public notification will be necessary, the level of the recall, and the number of effectiveness checks required.*

DEPTH/LEVEL OF RECALL: Level of market removal/withdrawal i.e. consumer level, retail level, wholesale.

EFFECTIVENESS CHECKS: Investigations by direct visits, phone calls, letters or other verified methods to assure that all accounts receiving the product have been notified of the withdrawal/recall and have taken appropriate action.

HEALTH HAZARD EVALUATION: An evaluation of the health hazard the product presents being withdrawn/recalled or considered for recalled. This evaluation will be conducted by the firm, an outside laboratory, and/or applicable federal agency expert.

CONSUMER ALERT: A notice to customers identifying brand name, product name, and lot number of a potentially hazardous product or product subject to recall or withdrawal.

TOLERANCE LEVEL: level permissible for an added poisonous or deleterious substance, unavoidable contaminant, or food additive in a food product (phosphates.)

ACTION LEVEL: The level of contamination at which a product will become subject to regulatory action including seizure or condemnation.

RECALLING FIRM: The firm that initiates a recall, or has the primary responsibility for the manufacturing and/or marketing of the product to be recalled.

FIRM-INITIATED RECALL: A recall initiated by a firm in response to a formal request from the applicable federal agency.

GOVERNMENT-INITIATED RECALL: A recall undertaken by a firm in response to a formal request from the applicable federal agency.

CORRECTION: A firm's modification, relabeling, or destruction of a product with the concurrence of the applicable federal agency. When USDA is involved permission must be granted for the corrective action.

INJUNCTION: Statutorily authorized federal/state action preventing a processing facility of wholesale/retail items from conducting all or part of its business activities.

MASS SEIZURE: Federal action to gain control over a part or all of a processing establishment or warehouse/retail facility in which part or the entire product is considered contaminated/adulterated.

SEIZURE: A statutorily authorized federal/state action to gain legal control over the allegedly contaminated/adulterated/misbranded product.

RECALL NOTIFICATION FORM

URGENT: (type of product) **RECALL**

(Rename of product, product code, and lot number)

Sadler's Smokehouse, LLC. 2088M/2088P requests all the wholesalers and retailers to immediately examine existing inventory and segregate the following product(s).

| ITEM CODE | PRODUCT DESCRIPTION | PACK | LOT CODE | SHIP DATE |
|--------------|---------------------|------|----------|--------------|
| 1) | | | | |

We have recently discovered that (name of product) may show a deficiency; specifically

[short description of reason for recall]

To fulfill our joint responsibility to the consumer to provide a quality and wholesome food product, we would request your assistance in the removal of this product from distribution.

- **First**, we request that you review our products from your inventory, and segregate and hold all products meeting the size and code description in this notice.
- **Second**, our representative will contact you to arrange for retrieval of the merchandise and to issue you a credit. Arrangements are being made to ship replacement products to you as soon as possible.
- **Third**, please return the enclosed card immediately providing the request information.

Thank you for your cooperation.

Adria Adams
Recall Coordinator
Sadler's Smokehouse, LLC
aadams@sadlersbbq.com

**Notice from Sadler's Smokehouse, LLC.
to Retail Outlet or Distribution Center**

*****RECALL ALERT—URGENT*****

Sadler's Smokehouse, LLC has requested all retail stores to recall inventories of products listed below.

| ITEM CODE | PRODUCT DESCRIPTION | PACK | LOT CODE | SHIP DATE |
|----------------------|----------------------------|-------------|-----------------|----------------------|
| 1) | | | | |

Please isolate and hold the above listed products in a storage area or specify pre-designated area. A company representative will contact you to issue credit and arrange for disposition of the products.

If you have any questions please call Adria Adams at 903-658-2681

Please return this notice to:

Sadler's Smokehouse, LLC.
Adria Adams
1206 N. Frisco
Henderson, TX 75652

Fax: 903-655-8404

Finally, please notify Sadler's Smokehouse, LLC when product has been disposed/picked up by Sadler's Smokehouse, LLC.

Thank you for your cooperation,

Adria Adams
Recall Coordinator
Sadler's Smokehouse, LLC.

PRODUCT RECALL EFFECTIVENESS CHECK

To Distributors:

Please answer the following questions regarding the product recall.

- | Yes | No | |
|-------|-------|--|
| _____ | _____ | 1. Did you receive notification of the recall of (product)? |
| _____ | _____ | 2. Did your firm receive shipments of the product being recalled? |
| _____ | _____ | 3. Do you currently have any of the recalled products on hand? |
| _____ | _____ | 4. Have you been contacted by representatives of Sadler's Smokehouse, LLC. concerning disposition of the product? |

If you have any questions please contact, Adria Adams, Sadler's Smokehouse, LLC.
(979) 777-2000.

FDA/USDA NOTIFICATION

Date

FDA District Office
Food and Drug Administration

Regional Director
Food and Safety Inspection Service

Dear Sir or Madam:

This is a letter to apprise you that Sadler's Smokehouse, LLC. Sales has initiated a removal/correction of one of our products recently distributed.

4. Product involved (list product name, size description, and packaging or date code)
5. Reason for action (identify short, simple, non-legal terms the problem what the product, i.e. Contamination-filth in tubs.)
6. Evaluation of risk (Provide a brief description of your health hazard evaluation setting out your conclusions regarding the harm and probability of harm.)
7. Distribution (include the total amount produced, and where and when the product was produced, the best guess as to the amount of products in distribution channels, the number of accounts sold and areas of the country.)
8. Recall Strategy (provide a short and distinct statement setting out the recall strategy including such things as depth of recall and effectiveness checks.)

Respectfully,

Adria Adams
Recall Coordinator
Sadler's Smokehouse, LLC.
979-777-2000

SQFI NOTIFICATION

Date

SQFI

2345 Crystal Drive
Suite 800
Arlington, VA 22202 USA

Dear Sir or Madam:

This is a letter to apprise you that Sadler's BBQ Sales has initiated a removal/correction of one of our products recently distributed.

- Product involved (list product name, size description, and packaging or date code)
- Reason for action (identify short, simple, non-legal terms the problem with the product, i.e. Contamination-filth in tubs.)
- Evaluation of risk (Provide a brief description of your health hazard evaluation setting out your conclusions regarding the harm and probability of harm.)
- Distribution (include the total amount produced, and where and when the product was produced, the best guess as to the amount of products in distribution channels, the number of accounts sold and areas of the country.)
- Recall Strategy (provide a short and distinct statement setting out the recall strategy including such things as depth of recall and effectiveness checks.)

Respectfully,

Adria Adams
Recall Coordinator
Sadler's Smokehouse, LLC
979-777-2000

CERTIFIED BODY NOTIFICATION

Date

FSNS

199 W. Rhapsody
San Antonio, TX 78216 - USA

Dear Sir or Madam:

This is a letter to apprise you that Sadler's BBQ Sales has initiated a removal/correction of one of our products recently distributed.

- Product involved (list product name, size description, and packaging or date code)
- Reason for action (identify short, simple, non-legal terms the problem with the product, i.e. Contamination-filth in tubs.)
- Evaluation of risk (Provide a brief description of your health hazard evaluation setting out your conclusions regarding the harm and probability of harm.)
- Distribution (include the total amount produced, and where and when the product was produced, the best guess as to the amount of products in distribution channels, the number of accounts sold and areas of the country.)
- Recall Strategy (provide a short and distinct statement setting out the recall strategy including such things as depth of recall and effectiveness checks.)

Respectfully,

Adria Adams
Recall Coordinator
Sadler's Smokehouse, LLC

979-777-2000

SADLER'S SMOKEHOUSE, LLC.
Withdrawal/Recall INVESTIGATION FORM

1. Identification of Product:
 - a. Brand name
 - b. Size
 - c. Julian date
 - d. Other information
2. Nature of complaint:
3. Name address and telephone number of complaining party
4. Date complaint was made:
5. Was complaining party contacted?
 - a. By whom
 - b. Date contacted
6. Sample of product taken from complaining party:
 - a. date:
 - b. by whom:
 - c. amount:
7. Sample of product taken from a different source:
 - a. date:
 - b. by whom:
 - c. amount:
8. Analysis of samples:
 - a. date:
 - b. laboratory:
 - c. results:
9. Harm which may occur from alleged defect:
10. Results of Investigation:

Emergency Contact Phone List

Rusk County Sheriff
210 West Charlevoix Street
Henderson, TX 75652-3154
(903) 657-3581

Henderson: Police Department
610 US Highway 79 North
Henderson, TX 75652
(903) 657-3512

Henderson Fire Department
400 West Main Street
Henderson, TX 75652-3019
(903) 657-6551

ETMC Henderson-etmc.org - (903) 657-2386

Good Shepherd Medical Center-www.gsmc.org - (903) 315-2000

Longview Regional Medical Center-www.longviewregional.com - (903) 758-1818

FSIS/USDA
DISTRICT 40
States: Texas
Dr. Jennifer McKean, District Manager
1100 Commerce Street
Room 516
Dallas, TX 75242
Phone: (214) 767-9116
FAX: (214) 767-8230
24-Hour Emergency: (214) 767-9116
Admin. Functions:
Mr. Dale Jackson
(214) 767-9116

FBI Dallas
One Justice Way
Dallas, Texas 75220
dallas.fbi.gov
(972) 559-5000

Texas Dept of Health and Human Services
Texas Health and Human Services (HHS) state office headquarters is located at:
Brown-Heatly Building
4900 N. Lamar Blvd.
Austin, TX 78751-2316
P.O. Box 0000
Austin, Texas 78714-9030
Main number: 512-424-6500
TTY number: 512-424-6597
Media calls: 512-424-6951

Carrie Williams
Chief Press Officer
512-424-6951
carrie.williams@hhsc.state.tx.us

SQFI
2345 Crystal Drive
Suite 800
Arlington, VA 22202 USA
Telephone: +1 202-220-0635
Fax: +1 202-429-4519
Email: info@sqfi.com

FSNS
199 W. Rhapsody
San Antonio, TX 78216 - USA
Phone: +1 (210) 525 1702

Customer List –See Customer List