BEEF SUPPLIER MASTER LETTERS

2023

January 6, 2023

To our Valued Customers:

All American Meats (AAM) hereby states that each and every edible article contained in and comprising each shipment, is guaranteed at the time and place of such shipment, to be not adulterated or misbranded within the meaning of the U.S. Federal Meat Inspection Act and the U.S. Federal Food, Drug and Cosmetic Act. The programs and initiatives implemented and maintained within our Food safety system are as follows;

- All American Meats is a USDA federally inspected establishment (Est# 20420)
- The HACCP process description utilized by AAM is Raw Ground. This HACCP plan has been validated by in-plant scientific studies with on-going verification procedures conducted at specified frequencies. The plan is maintained on file within our establishment and is available for customer review upon an on-site visitation.
- The products provided are single ingredient raw ground beef of various fat/lean blends.
- Our establishment has a contingency plan that covers continuity of operations.
- Sanitation Performance Standards per 9 CFR 416. 1 through 416.6.
- Sanitation Standard Operating Procedures (SSOP) per 9 CFR 416. 11 through 416.16.
- Hazard Analysis and Critical Control Points Systems (HACCP) per 9 CFR 417.
- Routine Salmonella testing is conducted by USDA, FSIS and AAM on finished ground beef products.
- All American Meats, Inc. only buys raw materials from official USDA establishments that have HACCP systems validated to reduce E. coli O157:H7, Non-O157 STECs, and Salmonella to below detectable levels.
- All American Meats, Inc. only buys raw beef trim materials derived from domestic cattle (Born, Raised and Harvested in the United States).
- All raw beef materials purchased for ground beef production have been tested and found negative for *E. coli* O157:H7 prior to production (Sampling must at a minimum consist of 2 combo lots utilizing an N=60 sampling plan).
- Our raw ground beef products are comprised of single ingredient raw beef items which are not part of the Big 8 Allergen listing. Therefore, there are presently no concerns with allergens related to our raw ground beef.
- AAM maintains a High Event Period (HEP) program that does not allow the receipt of any raw materials from suppliers that have experienced a Systemic High Event Period (SHEP).
- Reassessment of HACCP system performed annually as required by 9 CFR 417.4 (a) (3) and when there is an occurrence of unforeseen hazards in accordance with 417.3 (b).
- Ongoing monthly verification testing of finished Ground Beef products for *E. coli* O157:H7. All pathogen testing of beef trim performed by a third-party laboratory utilizing the PCR BAX method.
- AAM only receives boneless beef items for conversion to ground beef. No Specified Risk materials (SRM) are received into our facility.
- All products are refrigerated throughout the process in order to maintain cold chain and prevent bacterial proliferation.

- AAM complies with USDA/AMS food security requirements for both domestic and international sales.
- Maintains a written comprehensive recall strategy that conducts traceability exercise twice a year (trace forward and trace back).
- Annual third-party audits are conducted to certify our processes are compliant with the GFSI standards under BRC—current AA Rating.
- AAM only purchases raw beef materials from Halal certified suppliers. All of our products are Halal certified, but not Kosher certified.
- Emergency Contacts are as follows;

Shawn Buchanan—President	Emile Randazzo—VP of Reg. Affairs/QA
Wk.: 402-734-6901/Cell: 402-630-9528	Wk.: 402-733-1711/Cell: 402-578-8110
aam@radiks.net	edazzo@nbeef.com

Our mission at All American Meats is a commitment to food safety and a dedication to the production of the highest quality ground beef that is both safe and wholesome for our customers and their consumers. As a customer of All-American Meats, we thank you for your interest and continued business and if there is any additional information you need, please do not hesitate to contact me.

Sincerely,

Juan Carlos Ruiz

Juan Carlos Ruiz
Plant Manager

AMERICAN FOODS GROUP, LLC

500 S. Washington Street
Green Bay, WI 54301
Tel (920) 473-6330 Fax (920) 436-6466

January 1, 2023

Re: 2023 Further Processing Letter of Guarantee

Dear Valued Customer:

American Foods Group, LLC (AFG) facilities have been operating under a Pathogen Reduction/Hazard Analysis and Critical Control Point (HACCP) system while being federally inspected and verified by the United States Department of Agriculture (USDA) Food Safety Inspection Services (FSIS).

The establishments covered by this letter include:

Est. 18076	**East River**	**Green Bay, WI**
Est. 4215	**Skylark Meats**	**Omaha, NE**
Est. 31593	**Northland**	**Green Bay, WI**

HACCP
Our establishments comply with FSIS HACCP (9 CFR 417) and SSOP requirements (9 CFR 416). Each HACCP plan is reassessed at a minimum of annually and have ongoing verification and validation programs that comply with the USDA Interim Final Rule published in the Federal Register on January 12, 2004. *E. coli* O157:H7 and Non-O157 STEC [O26, O45, O103, O111, O121 & O145] are considered a 'hazard reasonably likely to occur' in the establishment's beef raw non-intact HACCP plans.

***E. COLI* O157:H7**
Raw materials utilized at American Foods Group, LLC follow a robust sampling plan under N60, N60+ and/or Manual Sampling Device [MSD] sampling on boneless beef trimmings, red offal (head, cheek meat, and hearts) and any other products when destined for raw non-intact use. Beef trimmings and/or primals associated with a slaughter establishment High Event Period are not permitted for use in our raw non-intact processes.

Except for beef trimmings and other raw ground beef components intended to be treated for lethality, all beef trimmings and components destined for raw non-intact use have been sampled for the presence of *E. coli* O157:H7. A negative Certificate of Analysis (COA) is required prior to receiving any raw materials destined for raw non-intact use.

If a finished product COA is provided for *E. coli* O157:H7, then the samples listed in that report represent products that were produced from a system that controls both *E. coli* O157:H7 and Non-O157 STECs. When finished product sampling occurs at the further processing facilities, a test and hold program is implemented, along with appropriate product disposition as needed. Ground beef products not intended for a full lethality treatment, are produced only from raw materials that have tested negative for *E. coli* O157:H7.

PRODUCT INTENDED USE
AFG facilities that produce subprimal products packaged into vacuum bags and either boxed or placed into combos that are not tested and are intended solely for intact use. AFG expects any customers who purchase vacuum packaged primals in boxes or combos, and utilizes these products for non-intact processes, to address the specific usage within their HACCP plan.

NOTE: Vacuum packaged beef subprimals in a combo or box are not intended for use in raw non-intact products.

FOOD SAFETY & QUALITY PROGRAMS
American Foods Group, LLC follows a strict food safety management process that supports our food safety system. Our processing facilities have supporting prerequisite programs encompassing: Good Manufacturing Practices (GMPs), Foreign Material Control, Food Fraud Program, Pest Control Program, Product Hold Program, Food Defense Program, Allergen Control Program, storage and processing temperature management and a recall and traceability procedure, which provides for trace-back and trace-forward capabilities to ensure that the proper products and dates can be identified if necessary.

Non-Meat Ingredients
Suppliers for American Foods Group, LLC must have an annual 3rd party GFSI or industry equivalent audit, an updated food safety plan which identifies and controls hazards, current specifications, and a complete allergen assessment.

Third Party Audits
Our facilities have obtained certification under an approved Global Food Safety Initiative (GFSI) standard.

Supplier Approval Program
AFG has robust supplier approval prerequisite programs as the foundation enabling our HACCP systems to function more effectively. We rely on this program to help mitigate possible biological, chemical and physical hazards and provide the mechanisms by which we ensure supplier compliance with our specifications and food safety/quality requirements.

AFG is committed to only using material from suppliers that meet or exceed our requirements. We require all raw material suppliers comply with applicable government regulations and meet the following specifications in order to become and remain an approved supplier.

The broker/distributor/purchasing agent has responsibility to ensure their suppliers comply with these requirements.

- HACCP
    - Raw meat and poultry purchased from the United States or Canada are USDA/CFIA inspected facilities operating under a Pathogen Reduction/Hazard Analysis and Critical Control Point (HACCP) program.
        - Foreign facilities must be operating under “equivalent” inspection programs and certified by USDA-FSIS to export to the US or CFIA to export to Canada.
    - Suppliers must have adequate segregation programs, if handling multiple species in one location, to ensure there is no risk of substitution and the labeled species is accurate.

- SSOPs and Pre-requisites Programs
    - Meat and poultry supplier facilities must have implemented written SSOPs/pre-requisites and training programs sufficient to ensure all processing and handling equipment is cleaned and sanitized properly, and that sanitation effectiveness is monitored during pre-operational inspection.
- Animal Handling
    - Meat and poultry harvest facilities must:
        - Be in compliance with FSIS Directive 6100, Rev. 3, Ante-Mortem Livestock Inspection, Final Regulations for Non-Ambulatory Disabled Cattle and Specified Risk Materials (SRMs) or the SFCR.
        - Require all animals be handled in a manner compliant with the current "Recommended Animal Handling Guidelines and Audit Guide" published by the North American Meat Institute (NAMI) Foundation. In addition, poultry suppliers shall be compliant with standards set forth by the National Turkey Federation (NTF) Animal Care Guidelines and Best Management Practices or the National Chicken Council (NCC).
- Meat and Poultry Supplier Audits
    - Meat and Poultry supplier facilities must schedule, conduct and maintain certification against a Global Food Safety Initiative (GFSI) certification audit.
    - As applicable, must have conducted an animal handling audit by a PAACO trained or equivalent auditor annually.
- Non-Meat Ingredient suppliers
    - Must have an annual 3rd party audit
    - Incorporate a food safety plan within their process, sufficient to identify and control hazards.
- Beef intended for raw ground use must also comply with;
    - Facilities shall have interventions to control Specified Risk Materials (SRMs)
    - Facility shall have validated interventions to control *E. coli* O157:H7 and STECs.
    - Microbiological Testing
        - All raw ground beef components will be sampled and tested for *E. coli* O157:H7. An N=60 equivalent or better sampling method must be used. AFG will not accept product that tests presumptive positive for *E. coli* O157:H7.

Enclosed is an executed copy of our continuing guarantee to support our commitment to delivering safe and wholesome product.

American Foods Group, LLC appreciates your partnership and commitment to food safety. For additional information and/or updates please visit our website at https://www.americanfoodsgroup.com/fsqa-documents/account/login or reach out to us directly at kwasielewski@americanfoodsgroup.com

Sincerely,

Alembke

Ashley Lembke, PhD
VP Food Safety & QA
American Foods Group, LLC

CONTINUING GUARANTEE

American Foods Group, LLC ("Seller") guarantees that each and every article of food delivered to or for ("Buyer"), as of the delivery date: (a) is not adulterated or misbranded within the meaning of the Federal Food, Drug and Cosmetic Act (the "FDC Act"), the Federal Meat Inspection Act and the Poultry Products Inspection Act, in each case if applicable; (b) is not an article which, under the provisions of sections 404 or 405 of the FDC Act, if applicable, may not be introduced into interstate commerce; and (c) if the article contains a color additive, the color additive was from a batch certified in accordance with the FCD Act, if applicable. This guarantee does not apply to any article subjected to improper use, handling or storage after delivery or to use contrary to or inconsistent with Seller's instructions. Seller shall not be liable for any breach of this guarantee arising out of or resulting from Seller's compliance with Buyer's specifications, labeling instructions or other requirements.

EXCEPT FOR THE EXPRESS WARRANTIES SET FORTH ABOVE AND THOSE IN A WRITING SIGNED BY AN OFFICER OF SELLER AND BUYER, SELLER MAKES NO REPRESENTATION OR WARRANTY WHATSOEVER WITH RESPECT TO THE ARTICLES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE. IN NO EVENT SHALL SELLER BE LIABLE TO BUYER OR ANY THIRD PARTY FOR ANY LOST PROFITS OR REVENUES, DIMINUTION IN VALUE, OR ANY OTHER CONSEQUENTIAL, INDIRECT, INCIDENTAL OR SPECIAL DAMAGES.

This guarantee shall remain in effect until terminated by Seller on written notice to Buyer, provided, however, that termination shall not be effective as to any orders accepted by Seller prior to termination. This guarantee supersedes and replaces any prior guaranties given by Seller.

American Foods Group, LLC

ALembke

Ashley Lembke, PhD
VP Food Safety & QA

Date: 01-01-2023

AMERICAN FOODS GROUP

500 S. Washington Street
Green Bay, WI 54301
Tel (920) 473-6330 Fax (920) 436-6466

January 1, 2023

Re: 2023 Beef Letter of Guarantee

Dear Valued Customer:

American Foods Group, LLC (AFG) facilities have been operating under a Pathogen Reduction/Hazard Analysis and Critical Control Point (HACCP) system while being federally inspected and verified by the United States Department of Agriculture (USDA) Food Safety Inspection Services (FSIS).

The following AFG harvest facilities have ante-mortem inspection conducted on all cattle intended for slaughter (9 CFR 309) and process only bovine species. The establishments covered by this letter include:

Est. 5511	**Gibbon Packing, LLC**	**Gibbon, NE**
Est. 410	**Green Bay Dressed Beef, LLC**	**Green Bay, WI**
Est. 2460	**Cimpls, LLC**	**Yankton, SD**
Est. 253	**Long Prairie Packing Co., LLC**	**Long Prairie, MN**

HACCP
Our establishments comply with FSIS HACCP (9 CFR 417) and SSOP requirements (9 CFR 416). Each HACCP plan is reassessed at a minimum annually and have ongoing verification and validation programs that comply with the USDA Interim Final Rule published in the Federal Register on January 12, 2004. Generic *E. coli* biotype I testing is also performed on carcasses per 9 CFR 310.25.

E. coli O157:H7 and Non-O157 STEC [O26, O45, O103, O111, O121 & O145] are considered a 'hazard reasonably likely to occur' in the establishment HACCP plans. Each HACCP plan contains at least one Critical Control Point (CCP) involving a pathogen intervention method specific to reducing *E. coli* O157:H7 below detectable levels.

Each facility operates a validated carcass thermal pasteurization system (either hot water or steam) with a designated CCP organic acid carcass cabinet. Additional validated antimicrobial methods in place include - organic acid sprays, steam vacuums, pre-evisceration antimicrobial treatments, carcass spray chill processing aid application, and cold chain management systems. Our facilities perform extensive microbial tests on carcasses which are statistically evaluated to serve as a process verification that our interventions are continually impacting microbial reduction.

Offal products intended for raw ground beef are treated with one or more processing aids which are demonstrated effective in reducing surface microbial contamination, which is considered as a CCP in their HACCP system. All CCP critical limits are monitored at a frequency to ensure process control.

An organic acid based antimicrobial agent is applied immediately prior to the packaging of subprimals. This agent is recognized by USDA-FSIS (Directive 7120.1) and CFIA as a "processing aid", therefore, there is no implication to labeling or including it in the ingredient statement. This treatment has been microbiologically validated in the facilities utilizing indicator microorganisms.

***E. COLI* O157:H7**

American Foods Group, LLC uses a robust sampling plan that utilizes N60+ and Manual Sampling Device [MSD] sampling on boneless beef trimmings, red offal (head, cheek meat, and hearts) and any other products destined for raw non-intact use.

100% of the sample is analyzed by an accredited third-party laboratory utilizing AOAC approved methodology using a multiplex PCR system for *E. coli* O157:H7. A negative Certificate of Analysis (COA) is then generated for all products destined for raw non-intact use. The absence of a COA is an indication that the product has either not been tested or the customer has not purchased tested products at the time of sale. If a COA is provided for *E. coli* O157:H7, then the samples listed in that report represent products that were produced from a system that controls both *E. coli* O157:H7 and Non-O157 STECs.

AFG facilities conduct ongoing verification of their *E. coli* O157:H7 sampling programs. The verification program is conducted at a minimum of once quarterly with an increased frequency during high prevalence months (April through September). This program is also used to meet industry best practice expectations that customers conduct on-going sample verification of their raw materials. AFG incorporates Non-O157 STECs within this program to provide additional data for review and verification of our intervention's effectiveness on these organisms.

NON-O157 STEC

AFG continues to evaluate our existing food safety systems, and incoming data along with published scientific research. Peer reviewed literature establishes that the existing *E. coli* O157:H7 pathogen intervention strategies are equally effective on Non-O157 STECs. We concluded that our existing pathogen reduction technologies and beef slaughter process controls for *E. coli* O157:H7 are effective in providing the same control to other Non-O157 STECs [O26, O45, O103, O111, O121 & O145] for beef trimmings and non-intact beef intended for raw use.

AFG will continue to collect and review necessary data from baseline research and testing methods for Non-O157 STECs and reassess accordingly.

HIGH EVENT PERIODS

AFG has a Hight Event Period (HEP) program when an abnormal number of presumptive positive *E. coli* O157:H7 results on trim have occurred in the same production day. If this occurs, the facility will hold and evaluate previously tested negative like-kind products. During this evaluation, a determination is made on whether or not products that previously tested negative may be associated with the presumptive positive product. If product is associated, that product is held and diverted to full lethality treatment or inedible use. Similar disposition of untested subprimal products may be taken if determined to be association with an Event.

PRODUCT INTENDED USE

Each AFG facility produces subprimal products packaged into vacuum bags and either boxed or placed into combos that are not tested and are intended solely for intact use. AFG expects any customers who purchase vacuum packaged primals in boxes or combos, and utilizes these products for non-intact processes, to address the specific usage within their HACCP plan.

AFG also produces tested trim, red offals (head, cheek, heart meat) and subprimal products that are not bagged and packaged 'naked' in lined boxes or combos. These products are robustly sampled utilizing N60 or equivalent methods and are intended for non-intact use, such as grinding, needle tenderizing or

injection.

NOTE: vacuum packaged beef subprimals in a combo or box are not intended for use in raw non-intact products.

Broker/Distributer/Purchasing Agent - The broker/distributor/purchasing agent has the responsibility to ensure their suppliers comply with these requirements.

FOOD SAFETY & QUALITY PROGRAMS

American Foods Group, LLC follows a strict food safety management process that supports our food safety system. Our harvest facilities have supporting prerequisite programs encompassing: Good Manufacturing Practices (GMPs), Foreign Material Control, Food Fraud Program, Pest Control Program, Product Hold Program, Food Defense Program, Allergen Control Program and a recall and traceability procedure; which provides for trace-back and trace-forward capabilities to ensure that the proper products and dates can be identified if necessary. All products are produced in an allergen free environment.

Third Party Audits - Our facilities have obtained certification under an approved Global Food Safety Initiative (GFSI) standard. In addition, each facility is evaluated annually by a 3rd party auditing firm using an E. coli Addendum, Animal Welfare (including transportation) by a PAACO Certified auditor and SRM audit.

Specified Risk Materials - AFG operations are in full compliance with Bovine Spongiform Encephalopathy [BSE] related regulations - 9 CFR 309, 310 and 318 et. al., Prohibition of the Use of Specified Risk Materials for Human Food and Requirements for the Disposition of Non-Ambulatory Disable Cattle.

Cattle processed at our facilities have not been subjected to air injection stunning (9 CFR 313.15(b)(2)(ii)). Our BSE control program also requires livestock producers to certify compliance with 21 CFR 589.2000 - Animal Proteins Prohibited in Ruminant Feed. All non-ambulatory disabled cattle are condemned and disposed of to rendering or landfill.

Drug Residue Testing - All AFG slaughter establishments operate with FSIS/USDA veterinarians that inspect and test suspect carcasses for chemical residues according to FSIS Directive 10,800.1 rev. 1 (03/03/2014). Each facility has implemented acknowledgement forms that producers sign to ensure understanding and compliance with the requirements for animals to be suitable for human consumption at the time of harvest.

Advanced Meat Recovery [AMR] - AFG utilizes mechanical meat/bone separation machinery to produce AMR. All product is produced in accordance with 9 CFR 301, 318 and 320. AFG utilizes atomic absorption spectroscopy to test product for non-complying specifications [Ca. >130.0 mg/100 g, Exc. Fe. 3.5 mg/100 g) and Ridascreen 10/5 kits for SRM testing.

Enclosed is an executed copy of our continuing guarantee to support our commitment to delivering safe and wholesome product.

American Foods Group, LLC appreciates your partnership and commitment to food safety. For additional information and/or updates please visit our website at https://www.americanfoodsgroup.com/fsqa-

documents/account/login or reach out to us directly at alarson@americanfoodsgroup.com or mhenriott@americanfoodsgroup.com.
Sincerely,

Ashley Lembke, PhD
VP Food Safety & QA
American Foods Group, LLC

CONTINUING GUARANTEE

American Foods Group, LLC ("Seller") guarantees that each and every article of food delivered to or for ("Buyer"), as of the delivery date: (a) is not adulterated or misbranded within the meaning of the Federal Food, Drug and Cosmetic Act (the "FDC Act"), the Federal Meat Inspection Act and the Poultry Products Inspection Act, in each case if applicable; (b) is not an article which, under the provisions of sections 404 or 405 of the FDC Act, if applicable, may not be introduced into interstate commerce; and (c) if the article contains a color additive, the color additive was from a batch certified in accordance with the FCD Act, if applicable. This guarantee does not apply to any article subjected to improper use, handling or storage after delivery or to use contrary to or inconsistent with Seller's instructions. Seller shall not be liable for any breach of this guarantee arising out of or resulting from Seller's compliance with Buyer's specifications, labeling instructions or other requirements.

EXCEPT FOR THE EXPRESS WARRANTIES SET FORTH ABOVE AND THOSE IN A WRITING SIGNED BY AN OFFICER OF SELLER AND BUYER, SELLER MAKES NO REPRESENTATION OR WARRANTY WHATSOEVER WITH RESPECT TO THE ARTICLES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE. IN NO EVENT SHALL SELLER BE LIABLE TO BUYER OR ANY THIRD PARTY FOR ANY LOST PROFITS OR REVENUES, DIMINUTION IN VALUE, OR ANY OTHER CONSEQUENTIAL, INDIRECT, INCIDENTAL OR SPECIAL DAMAGES.

This guarantee shall remain in effect until terminated by Seller on written notice to Buyer, provided, however, that termination shall not be effective as to any orders accepted by Seller prior to termination. This guarantee supersedes and replaces any prior guaranties given by Seller.

American Foods Group, LLC

Alembke

Ashley Lembke, PhD
VP Food Safety & QA
American Foods Group, LLC

Date: 01-01-2023

HACCP Statement

Animal Protein
North America

Beef Harvest

Thank you for requesting general information regarding specific initiatives at Cargill protein beef harvest establishments in the US and Canada. Cargill employs a validated multi hurdle intervention system in the production of our quality beef products at all of our harvest facilities.

The following facilities are inspected and verified by the United States Department of Agriculture (USDA) Food Safety Inspection Services (FSIS), harvest and process only bovine species at their facility, and no other species or ingredients of animal origin are utilized in these processes. The USDA Establishment numbers covered by this letter include:

Facility Location	FSIS Establishment #	FDA Registered
Friona, TX	86E	Yes
Dodge City, KS	86K	Yes
Schuyler, NE	86M	Yes
Fort Morgan, CO	86R	Yes
Wyalusing, PA	9400	Yes
Fresno, CA	354	Yes

Canadian beef harvest facilities have similar and equivalent programs to those in the U.S. The following facilities are inspected and verified by Canadian Food Inspection Agency (CFIA) harvest and process only bovine species at their facility, and no other species or ingredients of animal origin are utilized at these facilities. These facilities meet or exceed the requirements of the Canadian Food Inspection Agency (CFIA), as well as USDA import requirements:

Facility Location	CFIA Establishment #	FDA Registered
High River, AB Canada	93	No
Guelph, ON Canada	51	No

With regard to Cargill's Food and Drug Administration (FDA) Facility Registrations, Cargill's facility registrations were renewed on or before December 31, 2022 and are in effect through December 31, 2024. Registration numbers are considered as being confidential; therefore, Cargill does not disclose that information. As applicable, Cargill adheres to the requirement for FDA inspected facilities to be registered pursuant to the Public Health and Bioterrorism Preparedness and Response Act of 2002, and the current FDA Food Safety and Modernization Act. Locations manufacturing products that are federally inspected by the USDA FSIS or the CFIA are not required to register.

General Food Safety Programs

Cargill is committed to the safety and quality of our products. All Cargill beef harvest facilities are in compliance with all USDA and/or CFIA regulations, as appropriate and all edible products are produced under a fully implemented Hazard Analysis and Critical Control Points (HACCP) Plan, which meets all requirements set forth in 9 CFR 417 and/or the Safe Food for Canadian Regulations (SFCR). Additionally, Cargill facilities have in place Sanitation Standard Operating Procedures (SSOPs) that meet all requirements of 9 CFR 416 and/or the SFCR.

Facilities that harvest and process raw beef products do consider *E. coli* O157:H7 and specified Non O157 Shiga Toxin *E. coli* (STEC) as a 'hazard reasonably likely to occur" in Harvest HACCP plans. As interventions, fed cattle beef harvest facilities in the U.S. and Canada have installed hide-on carcass wash, pre-evisceration rinse cabinets, post-evisceration acid rinse cabinets, and steam pasteurization cabinets. Cow harvest facilities have combinations of the following installed interventions; hide-on carcass wash, steam vacuums, acid rinse cabinet, and steam pasteurization cabinets or hot water treatments. To eliminate or reduce the identified hazards to below detectable levels, Cargill has identified thermal pasteurization in the form of validated steam pasteurization intervention or validated hot water treatment as a Critical Control Point (CCP) for beef carcasses, the thermal pasteurization CCP is validated by scientific research and internal use of time/temperature monitoring probes. These validation procedures meet the requirements of 9 CFR 417 and the SFCR. Cargill has identified an acid rinse cabinet as a validated intervention for red meat offal removed prior to the thermal pasteurization. All CCP and control point critical limits are monitored at a frequency to ensure process control. Additionally, a peroxyacetic acid based antimicrobial agent is being applied immediately prior to packaging of subprimals. This agent is recognized by USDA-FSIS (Directive 7120.1) and CFIA as a "processing aid", therefore, there is no implication to labeling or including it in the ingredient statement. This treatment has been microbiologically validated in the facilities utilizing indicator microorganisms.

In addition, all harvest facilities perform extensive microbiological tests on carcasses and other beef products that serve as verification that the intervention system is functioning as designed. Cargill's harvest facilities located in the U.S. and Canada participate in USDA-FSIS Salmonella performance standards sampling (or equivalent sampling program) and sample carcasses for generic E. coli using the protocol designed in accordance with the requirements stated in 9 CFR 310.25. Moreover, all facilities also conduct routine environmental sampling for product contact pre-operational cleanliness at a variety of points in the production system. Depending on the facility, the microbiological monitoring includes testing for Aerobic Plate Count (APC), coliforms, and/or generic E. coli. Monitoring results are evaluated on an ongoing basis for trend analysis of the facility and products. Furthermore, all Cargill beef harvest facilities have supporting prerequisite programs encompassing:

- Good Hygiene Practices (GHPs)
- Foreign Material Control
- Retrieval and traceability procedure to ensure proper identification for all materials coming into/through the system and leaving the system.
    - Retrieval procedures are in place at each production facility such that in an emergency all products that are produced can be traced as product codes and volumes shipped, to the first level of distribution. Each of our production facilities has a Retrieval team made up of personnel identified according to the necessary disciplines needed for prompt action. Members of the team include Operations, Supply Chain, Transportation, Business and Sales, Food Safety, Quality, and Regulatory (FSQR), Corporate Affairs, Legal and Information Technology (IT) personnel, as necessary. These procedures are practiced at a minimum of annually to ensure effectiveness in the ability to trace all products and ensure all team members are competent in their roles.
    - In the event of a natural disaster or other crisis situation that renders a production facility inoperable, Cargill has production contingency plans that involve other Cargill facilities, as well as approved External Manufacturers.
- Pest Control Program
- Product Hold Program
- Food Defense Program
    - Facilities are access controlled, fenced and/or guarded. At all production establishments, visitors are restricted, except under certain strictly controlled circumstances. Food defense procedures have been in place for some time, and Cargill reviews these procedures on a regular basis.

- Allergen Control Program
    - Allergens have been considered in the hazard analysis for each Cargill facility and, where appropriate, programs have been established around the handling of any allergen containing ingredients.
    - Additionally, all established allergen programs are a part of internal audits and annual third party GFSI certified audits.
- Livestock Program
    - A livestock program to require all cattle producers to certify compliance with 21 CFR 589.2000, Animal proteins prohibited in ruminant food.

Supplier Approval Programs (https://www.cargill.com/about/external-sem-manual)

Cargill recognizes that the quality and safety of the products we produce is strongly influenced by the quality and safety of the materials we receive and is committed to only using material from suppliers that meet or exceed our requirements. Cargill requires that all raw material suppliers comply with all applicable government regulations and meet the following requirements in order to become and remain an approved supplier:

- HACCP
    - Raw beef purchased from the United States or Canada are USDA/CFIA inspected facilities operating under a implemented HACCP program.
        - Foreign facilities must be operating under “equivalent” inspection programs and certified by USDA-FSIS to export to the US or CFIA to export to Canada.
        - Meet the USDA Salmonella Performance Standards – for products sold to or within the United States.
    - Facilities shall have validated interventions to control E.coli O157:H7.
    - Microbiological Testing
        - All ground beef components will be sampled and tested for E. coli O157:H7. An N=60 equivalent (such as cloth swabbing) or better sampling method must be used. Cargill will not accept product that tests presumptive positive for E. coli O157:H7.
        - Intact lot loads must arrive with a negative certificate of analysis or product notification document.
        - Verification Sampling including STEC 6 must be completed per our supplier agreements.
        - Facility must have an effective “event period” program including actions on subprimals.
    - Suppliers must have adequate segregation programs, if handling multiple species in one location, to ensure there is no risk of substitution and the labeled species is accurate.
- SSOPs, Pre-requisites and Training
    - Beef supplier facilities must have implemented written SSOPs/Pre-requisite and training programs sufficient to ensure that all processing and handling equipment that contacts the meat or poultry is cleaned and sanitized properly and that sanitation effectiveness is monitored during pre-operational inspection.
- Live Animal Handling
    - Beef harvests facilities must have programs that:
        - Exclude non-ambulatory disabled livestock as defined by FSIS 6900.2, Rev. 2.
        - Are in compliance with FSIS Directive 6100, Rev. 2 Ante-Mortem Livestock Inspection, Final Regulations for Non-Ambulatory Disabled Cattle and Specified Risk Materials (SRMs) or the SFCR.
        - Require all animals be handled in a manner compliant with the current “Recommended Animal Handling Guidelines and Audit Guide” published by the North American Meat Institute (NAMI) Foundation.

- Beef Supplier Audits
    - Beef supplier facilities must schedule, conduct and maintain certification against a Global Food Safety Initiative (GFSI) certification or equivalent audit.
    - As applicable, must have conducted an animal handling audit by a PAACO trained or equivalent auditor annually.
- Non-Meat Ingredient Suppliers
    - Must have an annual 3rd party GFSI or industry equivalent audit.
    - In corporate a food safety plan within their process, sufficient to identify and control hazards.
    - Provide a specification for products supplied to Cargill.
    - Complete an allergen assessment or other necessary documentation to support claims and/or nutritional panels.
- Beef Raw Meat Suppliers must also comply with:
    - Facility shall have validated interventions to control *E.coli* O157:H7 STECs.
    - Microbiological Testing
        - All non-intact beef components will be sampled and tested for E. coli O157:H7. An N=60 equivalent or better sampling method must be used. Cargill will only accept product that tests presumptive positive for E. coli O157:H7 with documented agreement.
        - Intact lot loads must arrive with a negative certificate of analysis or product notification document.
        - Verification Sampling including *Shiga Toxin Escherichia coli* (STEC 6) must be completed per our supplier agreements.
        - Facility must have an effective "event period" program including actions on subprimals, if appropriate.
        -

Non O157 Shiga Toxin *E. coli*

Cargill refers to the Non O157 STEC6 (with *E. coli* O157:H7 as STEC7). As referenced in both FSIS Directive 10,010.1 revision 4 dated 8/20/15 and FSIS Directive 10,010.2 dated 7/01/2020 regarding verification activities, FSIS has carried out verification procedures, including sampling and testing manufacturing trim harvested on and after June 4, 2012 to ensure control of both *Escherichia coli* O157:H7 and six other serogroups of STEC (O26, O45, O103, O111, O121 and O145). Published research documents show the existing E. coli O157:H7 pathogen reduction technologies are effective on the STEC6. Therefore, no changes to pathogen control programs were implemented due to the reassessment. However, Cargill continues to collect and review necessary data from baseline research and testing methods for STEC7 and reassess accordingly.

STEC7 Control and Testing

As a part of our continuing food safety efforts, in facilities that test raw ground beef components, Cargill utilizes a Test and Hold program. A 'Product Notification Document' (PND) is sent to the customer receiving the tested raw ground beef components (the 'ship to' customer). This information contains the lot number of the product, the result, test method and other comments regarding the lab results. If you are not considered the 'ship to' customer, then this information would be sent to your sales representative or broker. Cargill's "PND" has been accepted with no objections by USDA and CFIA, as an alternative method to Certificate of Analysis (COA)[1].

A Test and Hold program is also in place in some facilities producing and testing finished ground beef. The statements of testing compliance are on the transportation bill of lading (BOL)[2].

A similar Test and Hold program is in place for all components destined for use in raw ground products such as Hearts,

Head Meat, Cheek Meat, Weasand Meat, Tongue Root, PDCB, FTB and other raw ground beef components[3]. Cargill would like to outline certain key aspects of its *E. coli* verification-testing program:

- Beef Trim lot integrity will always be kept intact. Lots will not be broken or split to cause combos within a lot to be sent to different customers.
- A robust N=60 surface excision sample program (such as cloth swabbing) is used for boxed and combo trim and other comboed raw beef components such as whole muscle meats sampled for *E. coli* O157:H7. A minimum of 60 samples are taken per lot, whether the lot is 1 combo or maximum of 5 combos.
- Note that Cargill does not sample and test any vacuumed packaged boxed primal or subprimal products since they are intended solely for intact product use. We would strongly encourage our customers to not use traditional boxed beef primals and subprimals in raw ground products and instead purchase trim in a combo or box or purchase grinds. This will ensure you have a test result meeting regulation requirements and a microbiologically independent lot. See the section of this letter entitled Vacuum Packaged Beef Subprimals Not Intended for Grinding for additional details.
- Ground Beef 95% lean product group [including Finely Textured Beef (FTB) and product variations including Primal specific products (i.e. Round, Sirloin and Chuck), Breed specific products (i.e. Angus, Certified Angus Beef), and Grade specific products (i.e. Choice); this product is also known in the marketplace as Beef Trimmings Finely Textured (BTFT) and (Canada Only) Finely Textured Beef Trimmings (BTFT)] sample program is in place where individual box sampling is performed for each lot and a minimum of 375g is tested. This program is used to meet the FSIS best practice expectation that customers conduct on-going verification of its incoming product and the SFCR.
- Partially Defatted Chopped Beef (PDCB) and Partially Defatted Cooked Chopped Beef (PDCCB) are also involved in sampling programs in which individual box sampling is performed for each lot and a minimum of 375g is tested.
- Cargill utilizes 3rd party accredited laboratories to conduct the tests.
- BioControl Assurance GDS, a PCR based test method, is utilized for *E. coli* O157:H7 and STEC6 testing. No cultural confirmation is completed for *E. coli O157:H7*. Disposition is determined on a presumptive positive test result. Cultural confirmation may, on occasion, be completed for STEC6.
- Cargill has a third-party verification program of its *E. coli* O157:H7 sampling program. Under this program, raw ground beef components are ground, sampled and analyzed to verify the effectiveness of sampling technique. The verification program is conducted at a minimum of once quarterly with an increased frequency during high prevalence months (April through September). This program is used to meet the FSIS best practice expectation that customers conduct on-going verification of its incoming product and the SFCR. Cargill has chosen to also test STEC6 within this program to provide additional data for review and verification of the interventions effectiveness on STEC6.

Event Period Protocol

Cargill has an "Event Period" program that when an abnormal number of presumptive positive *E. coli* O157:H7 results on trim and/or ground beef have occurred in the same production day, a facility will hold and evaluate previously tested negative like-kind products. During this evaluation, a determination is made on whether or not products that previously tested negative may be associated with the presumptive positive product. If product is associated, that product is held and removed from the raw ground beef material stream. Untested subprimal products may be evaluated for determination of association with the positive raw ground beef components as well. Additional details are available in separate letter.

Vacuum Packaged Beef Subprimals Not Intended For Grinding

Each Cargill facility produces subprimal products packaged into vacuum bags and either boxed or placed into combos that are not tested and are intended solely for intact use. Cargill expects any customers who purchase vacuum

packaged primals in boxes or combos, and utilizes these products for non-intact processes, to address the specific usage within their HACCP plan.

Cargill also produces tested trim and subprimal products that are not bagged and packaged in lined boxes or combos. Tested products are intended for non-intact use, such as grinding, needle tenderizing or injection.

3rd Party Audits

Cargill Beef Harvest facilities have obtained certification under an approved Global Food Safety Initiative (GFSI) standard. In addition, each facility is evaluated by a 3rd party auditing firm using an E. coli addendum, Animal Welfare (including transportation) by a PAACO Certified auditor and SRM audit annually

Control of Specified Risk Materials

Cargill is very cognizant of the concern of Bovine Spongiform Encephalopathy (BSE) occurring in North America and has joined others in requiring our suppliers of live cattle to verify that the cattle we purchase from them are in compliance with FDS CFR 9 589.2000. Operations at our facilities are governed by applicable USDA/CFIA regulations, including all additions pertaining to the exclusion of "Specified Risk Materials (SRMs)" from the human food supply. Cargill Beef harvest facilities are in compliance with FSIS-2007-0015, Final Regulations for Non-Ambulatory Disabled Cattle and Specified Risk Materials (SRMs) or the SFCA. All SRMs are segregated from Human food and discarded to inedible rendering, incinerated or landfilled:

- The tonsils and spinal cords are removed from all carcasses.
- The skull including brains, eyes and trigeminal ganglia are sent to landfill from all cattle 30 months and older.
- In order to ensure the complete removal of the dorsal root ganglia, the vertebral column of cattle aged 30 months and older (excluding the vertebrate of the tail, the transverse processes of the thoracic and lumbar vertebrae, and the wings of the sacrum) will be removed during fabrication and discarded to inedible rendering, incinerated or landfilled.
- Carcasses are segregated according to age based on the guidelines presented in FSIS-2007-0015 or the SFCR. to ensure proper disposal of SRMs from cattle 30 months or older.
- Eighty inches of small intestines including the distal ileum as measured from the ileocecal junction is discarded to rendering.
- No air injection stunning is used.
- Cattle identified as over 30 months of age are identified in the finished product containers at the Canadian facilities with either a triangle 3 marking or a 'CD' as the first digits of the item number on the finished box label. CD item codes also have ONLY FOR DOMESTIC SALE IN CANADA on a box or combo label.
- US facilities follow labeling directives 6100.1, 6100.4 and 7160.1 for proper identification of products.
- Condemned cattle not undergoing antemortem inspection are not processed by the facility and are removed by a licensed rendering facility or send to a landfill/composting.

Animal Handling

Cargill is committed to meeting all applicable regulations that pertain to animal handling and the proper care of animals as regulated by the USDA/ CFIA Animal Welfare regulations, as well as the current North American Meat Institute (NAMI) Good Management Practices for Animal Handling. The following information is provided to demonstrate our commitment to Animal Welfare:

- Cargill has a systematic approach to humane handling that meets or exceeds FSIS Directive 6900.2 and/or the SFCR and Meat Inspection Regulation 57.

- Cargill has training programs in place specifically designed to address animal handling issues. The NAMI training guidelines developed by Dr. Temple Grandin are the foundation of this program.
- Industry experts have been used to design equipment and review the animal handling and slaughter process.
- An independent 3rd party Professional Animal Auditor Certification Organization (PAACO) trained auditor completes yearly audits. In addition, Cargill completes internal daily monitoring audits, as well as independent 3rd party daily observation audits to ensure animal handling requirements are continuously met.
- All Cargill Beef Harvest facilities have a PAACO certified auditor on site.

Export

To ensure all products meet or exceed the standards set for export into other countries, Cargill specifies certain products and produces them under the standards set forth for export into those countries. All products should be verified to be eligible for export to that country prior to producing the finished product for export. All products are adequately labeled to provide the necessary required information to complete Form 9060-6 for export.

Residue Testing

All US Cargill Meat Solutions establishments are federally inspected by trained FSIS/USDA veterinarians, which inspect and test suspect carcasses for chemical residues. In addition, FSIS Directive 10,800.1 “Procedures for Residue Sampling, Testing, and other Responsibilities for the National Residue Program” and its Clarification Notice 44-01 outline procedures for random evaluation of carcasses. Each Public Health Veterinarian (PHV) located at each Cargill Facility will follow the random sampling request sent to them from the Office of Public Health Science (OPHS). Any sampled carcasses are retained until sample results are returned and found to be negative. Additionally, all Canadian Cargill establishments are also Federally inspected under the supervision of CFIA veterinarians. The inspection staff follows the random sampling plan to test for residues as outlined in the CFIA “National Chemical Residue Monitoring Program”. The facilities have implemented acknowledgement forms that producers sign to ensure understanding and compliance with the requirements for animals to be suitable for human consumption at the time of harvest.

General Statements

Cargill beef harvest facilities are continuously striving to minimize pathogenic bacteria contamination through the implementation of proven new technology and advanced testing programs, while at the same time exploring new technologies as they come into existence.

Cargill believes our food safety program sets the standard for the industry, but at the same time, neither we, nor for that matter, anyone is able to guarantee pathogen free raw materials. Accordingly, we want to reiterate the importance of proper handling and cooking of all raw meat products by you and your customers. Cargill commits to ensure prompt updates to our documents upon any changes to our procedures or processes.

References:

Published Non-O157 STEC documents can be found from the NAMI Foundation website: http://www.namif.org/research/

BIFSCo Best Practices for Processing Raw Ground Beef Products www.bifsco.org/bestpractices.aspx

FSIS Directive 10,010.1 (pages 58 – 60) http://www.fsis.usda.gov/Regulations_&_Policies/index.asp

Compliance Guidelines for Establishments on the FSIS Microbiological Testing program and other verification activities for *Escherichia coli* O157:H7 April 13, 2004 http://www.fsis.usda.gov/oppde/rdad/fsisdirectives/10010_1/ecolio157h7dirguid4-13-04.pdf

USDA Export Checklist http://origin-www.fsis.usda.gov/regulations_&_policies/Export_Checklist/index.asp

Revision History:

1/1/2023 – Updated FTB to Ground Beef 95%, added verbiage around cloth swabbing, transferred to new template
11/22/2022 transferred statement to the Thrive template.
1/1/2022 – Reviewed, no changes needed
1/1/2021 – Updated FDA registration dates
7/20/20 – Updated revision date for FSIS Directive
10,010.2 1/1/20 – updated wording to improve sentence
flow.
3/11/19 – updated references from CFIA MOP to The SFCR
1/1/19 – Add a General Statement section and updated FDA registered dated.
4/30/18 – Added statement saying product with CD on the label is for only Domestic Sale In Canada.
3/6/18 – Updated FDA Registered facilities.
2/1/18 – Updated identification of cattle over 30 months of age from Canadian facilities.
1/2/18 – Added "product hold program", added "by a PAACO Certified auditor" to the Animal Welfare (including transportation) statement. Added cattle not undergoing antemortem inspection statement. Updated 30 month of age identification statement. Changed "Recall" to "Retrieval" and updated team names under retrieval point. Changed format. Updated Approved Supplier Programs section. Added Bioterrorism and FDA registration numbers statement.
6/29/17 – added the "Finely Texture Meat" statement.
1/7/17 – Added the 'dba' statement; made grammatical and clarification language updates.
1/7/16 – Removed Milwaukee facility references. Added single species statements, updated allergen control section, added supplier approval requirements, added Canadian chemical residue program statement, added CFIA animal welfare regulation reference and made grammatical and clarification language updates.

***Claims**: The labeling, substantiation and decision making of all claims for your products is your responsibility. We recommend you consult regulatory and legal advisors familiar with all applicable laws, rules and regulations prior to making labeling and claims decisions for your products.*

Contact

FSQR Customer Value North America

NA-FSQRInfo@Cargill.com
https://www.cargill.com/meat-poultry/meat-food-safety
https://www.cargill.com/meat-poultry/feed-safety

January 03, 2023

LETTER OF GUARANTEE 2023 – Est# 675

Caviness Beef Packers, LTD – Hereford, TX

Caviness Beef Packers, LTD Est#675, hereinafter referred to as CBP, is a Federally Inspected Establishment that complies with USDA requirements and related FSIS Directives and Notices. Food safety is our culture and highest priority. All products delivered to you are solely derived from domestic cattle. CBP is in compliance with the latest revisions of FSIS Directives 5000.1, 6410.1, 6420.2, 10010.1, and 10800.1. We participate in 3rd Party Audits which consist of BRC, Animal Welfare, SRM Addendum, and E. coli O157:H7 Addendum Audits. HACCP plans and pre-requisite programs (SOP, SSOP, Food Defense Plan, and Recall Plan) are reassessed annually.

HACCP – CBP produces beef products under a Federally Approved HACCP Plan which complies with 9 CFR §416, §417, FSIS Notice 65-07 (reassessing for E. coli O157:H7), and FSIS Notice 40-12 (reassessing for non-O157:H7 STECs). We utilize five validated and verified intervention steps that provide our customers with products which meet or exceed FSIS and Industry Microbial and Quality Standards. HACCP Plans undergo a documented annual reassessment ((9 CFR §417.4(a)(3)), effective January of each year.

E. Coli O157:H7 – CCP's relative to E. Coli O157:H7 are verified with daily robust microbiological sampling using statistically justified procedures which assure control, elimination, and/or reduction of E. Coli O157:H7 and other pathogens (including Salmonella) to below detectable levels.

BIG 6 NON-O157 STECs – CBP produces product utilizing a validated multiple hurdle approach system that controls E. coli O157:H7 and also controls the "Big 6" Non-O157:H7 Shiga-Toxin producing E. coli (STEC). We have a program in place that validates our interventions on a monthly basis through analysis of E. coli O157:H7 as well as the "Big 6" serogroups (STEC; O26, O45, O103, O111, O121, and O145).

SALMONELLA – We adhere to the Salmonella Performance Standards as per 9 CFR §310.25.

SAMPLING – Samples are collected by three methods; N=60 Excision (≥375g) where 5 or less combos of beef trim comprise one lot, IEH's N60 Plus Sampler yielding single combo lots, and Fremonta's MicroTally MSD cloth sampling yielding by single combo lots. Certificate of Analysis reports accompany all tested beef trim loads. Lab method used for commercial lots is Hygiena's BAX RT# Exact, AOAC RI# 102003. All laboratories used for microbiological testing are AOAC approved and accredited by the recognized International Standard ISO/IEC 17025. CBP performs carcass sampling for Generic E.Coli as per 9 CFR §310.25.

INTENDED USE – Unless otherwise specified, CBP produces intact primals/subprimal products. Meeting the definition by not needle tenderizing, grinding or otherwise enhancing any primals/subprimals produced at our facility. Caviness expects any customer who purchases beef primals/subprimals and then uses that product for other than intact production, to address that specific usage within their HACCP plan and have the appropriate controls in place.

HEP – CBP has established a rigorous statistically based High Event Period program that mimics *FSIS Compliance Guideline for Establishments Sampling Beef Trimmings for Shiga Toxin-Producing Escherichia coli (STEC) Organisms or Virulence Markers,* August 2014. We have measures in place to prevent HEP implicated product from being released into commerce which include notification of customers.

January 03, 2023

FOOD DEFENSE – CBP has a Food Defense Plan and other pre-requisite programs in place that assures that no article of food sold to a customer will be adulterated, or misbranded within the meaning of the Federal Food, Drug and Cosmetic Act of 1938, the Federal Fair law; during procurement, production, storage or transportation. Product will be processed in accordance with 21 CFR §110.

INTERVENTIONS – CBP has five interventions that meet requirements of FSIS Directive 7120.1 and the USDA-FSIS Interim Final Rule published in the Federal Register on January 12, 2004. All interventions are validated on a Quarterly basis. We utilize Lactic Acid (LA) or Acidified Sodium Chloride (ASC) as an antimicrobial processing aide at the last two locations listed below.

1. Hot Water Pre-Evisceration Carcass Wash Cabinet – Harvest Date
2. Hot Water Carcass Wash Cabinet – Harvest Date – CCP
3. Lactic Acid Carcass Spray Cabinet – Harvest Date – CCP
4. Hypobromous Acid Spray Chill – Harvest Date
5. ASC Carcass Spray Cabinet – Fabrication Date
   LA or ASC Trim Spray – Fabrication Date
   LA or ASC Subprimal Spray – Fabrication Date

HUMANE HANDLING – CBP is in compliance with FSIS Directives 6900.2, 9 CFR §309 and §313 which address Humane Handling and Slaughter of Livestock, including Ante-Mortem inspection.

SRM & BSE – We produce product free from Specified Risk Materials, as defined in 9 CFR §310.22(a). SRMs have been addressed in our HACCP Plan and pre-requisite programs. We don not accept or slaughter non-ambulatory disabled livestock. We comply with FSIS Notice 56-07. CS complies with 9 CFR §309, §310, §311, §318, Directive 6100.1 and 6100.4. The SRM brain matter is addressed at the stunning process meeting requirements in 9 CFR §313.15(b)(2)(ii), (air injection stunning devices are not in use at our facility).

RUMINANT FEED BAN – CBP is in compliance with 21CFR589.2000 and 589.2001 which prohibit the feeding of ruminant meat and bone meal to ruminant animals. Records and affidavits are on file for all cattle purchased.

AMR – CBP does not produce AMR (advanced meat recovery) products.

ALLERGENS – CBP does not utilize allergens in any of our processes.

Sincerely,

Jorge Aleman
Director of FSQA
Caviness Beef Packers, LTD
(806) 290-8620 cell
jorge.aleman@cavinessbeef.com

January 03, 2023

LETTER OF GUARANTEE 2023 – Est# 7282

Caviness Beef Packers – Amarillo, TX

Caviness Beef Packers, LTD – Amarillo Est#7282, hereinafter referred to as CBA, is a Federally Inspected Establishment that is in compliance with USDA requirements and related FSIS Directives and Notices. Food safety is our culture and highest priority. All products delivered to you have been processed under approved methods and are derived from domestic cattle. Our beef trim suppliers are Caviness Beef Packers, LTD – Hereford Est#675 and CS Beef Packers LLC Est#630. Our suppliers have in place a Specified Risk Material (SRM) program for the identification and removal of all SRM's. CBA is compliant with FSIS Directives 5,000.1 and 10,010.1. We participate in 3rd Party BRC Audit. HACCP plans and pre-requisite programs (SOP, SSOP, Food Defense Plan, and Recall Plan) are reassessed annually.

HACCP – CBA produces beef products under a Federally Approved HACCP Plan which complies with 9 CFR §416, §417, FSIS Notice 65-07 (reassessing for E. coli O157:H7), and FSIS Notice 40-12 (reassessing for non-O157:H7 STECs). HACCP Plans undergo a documented annual reassessment ((9 CFR §417.4(a)(3)), effective January of each year.

E. Coli O157:H7 – By requiring robust sampling methodology of our raw material supplier and negative COAs for the receiving of trim products, we assure control, elimination, and/or reduction of E. Coli O157:H7 and also control the "Big 6" Non-O157 STECs in addition to other pathogens (including Salmonella) to below detectable levels. Suspect or non-negative samples for E. coli O157: H7 or Big 6, are returned/rejected back to originating establishment. All ground beef products will be derived from tested raw material combos that have yielded Negative E. coli O157:H7 results from a verified COA.

SAMPLING – Raw Material Samples are collected by three methods by our suppliers; N=60 Excision (≥375g) in which 5 or less combos of beef trim comprise one lot, IEH's N60 Plus Sampler which consist of single combo lots, and Fremonta's Micro Tally MSD cloth sampling represented by single combo lots. Certificate of Analysis reports accompany all tested beef trim loads. Lab method used for commercial lots is Hygiena's BAX RT Exact. All laboratories used for microbiological testing are AOAC approved in accordance with recognized International Standard ISO/IEC 17025.

FOOD DEFENSE/FOOD SECURITY – CBA has a Food Defense Plan / Food Security Plan in place that assures that no article of food sold to a customer will be adulterated, or misbranded, within the meaning of the Federal Food, Drug and Cosmetic Act of 1938; during the procurement, production, storage and/or transportation of all products. Products are processed in accordance with 21 CFR §110.

ALLERGENIC PRODUCT CONTROL – CBA has SOP's and SSOP's as part of an Allergenic Product Control Plan in place that assure that non-allergen products are not labeled as containing allergenic product, are not co-mingled or pass across the same product surfaces without proper washed down, pre-op, and swabbing of equipment utilized to test for specific allergen residues being left over.

ADDED SEASONINGS – CBA utilizes added seasonings as part of customer required specification for specific products. These seasonings are verified by LOG (Letter of Guarantee) to be produced in the United States and are set on schedule to be utilized in production after products that do not contain or require seasonings. A FIFO (First In-First Out) staging is utilized to assure that seasonings used are not expired for the freshest use on added seasonings.

SHELF-LIFE STUDIES – Shelf-life studies are performed on every new product type and when a significant change occurs. Random shelf-life studies are continued on a yearly basis.

GASED PRODUCTS – CBA utilizes approved product gasses to promote shelf life on fresh Overwrap product and also in Fresh Vacuum sealed packaging as part of specific customer specifications. We will utilize two types of gas mixtures: Bi-gas (Low Ox) mixture of 70% N_2 / 30% CO_2 and Tri-gas (Low Ox) mixture of $CO/CO_2/O_2$. Gas is metered and monitored during the use into specified product.

HUMANE HANDLING – All Humane Handling is performed by suppliers. CBA is a Grinding and trim repackaging facility only.

AMR – CBA does not produce or use AMR (Advanced Meat Recovery) products

LFTB – CBA does not utilize LFTB (Lean Finely Textured Beef) in any of our products.

Sincerely,

Jeff Troxell
FSQA Superintendent
Caviness Beef Packers, LTD
(806) 372-9070 ext. 4435 Office
jeff.troxell@cavinessbeef.com

January 03, 2023

LETTER OF GUARANTEE 2021 – Est# 630

CS Beef Packers, LLC – Kuna, ID

CS Beef Packers, LLC Est#630, hereinafter referred to as CS, is a Federally Inspected Establishment that complies with USDA requirements and related FSIS Directives and Notices. Food safety is our culture and highest priority. CS complies with the latest revisions of FSIS Directives 5000.1, 6410.1, 6420.2, 10010.1, and 10800.1. We participate in 3rd Party Audits which consist of a BRC Audit, an Animal Welfare Audit, a SRM Addendum Audit, and an E. coli O157:H7 Addendum Audit. HACCP plans and pre-requisite programs (SOP, SSOP, Food Defense Plan, and Recall Plan) are reassessed annually.

HACCP – CS produces beef products under a Federally Approved HACCP Plan which complies with 9 CFR §416, §417, FSIS Notice 65-07 (reassessing for E. coli O157:H7), and FSIS Notice 40-12 (reassessing for non-O157:H7 STECs). We utilize four validated and verified intervention steps that provide our customers with products which meet or exceed FSIS and Industry Microbial and Quality Standards. HACCP Plans undergo a documented annual reassessment ((9 CFR §417.4(a)(3)) with last yearly reassessment completed January 2, 2021.

E. Coli O157:H7 – CCP's relative to E. Coli O157:H7 are verified with daily robust microbiological sampling using statistically justified procedures. By employing this robust sampling methodology, we assure control, elimination, and/or reduction of E. Coli O157:H7 and other pathogens (including Salmonella) to below detectable levels. **All ground beef products will be derived from tested raw material that have yielded Negative E. coli O157:H7 results from a verified COA.**

BIG 6 NON-O157 STECs – CS produces product utilizing a validated multiple hurdle approach system that controls E. coli O157:H7 and also controls the "Big 6" Non-O157:H7 Shiga-Toxin producing E. coli (STEC). We have a program in place that validates our interventions on a monthly basis through analysis of E. coli O157:H7 as well as the "Big 6" serogroups (STEC; 026, 045, 0103, 0111, 0121, and 0145).

SALMONELLA – We adhere to the Salmonella Performance Standards as per 9 CFR §310.25.

SAMPLING – Samples are collected by three methods; N=60 Excision in which 5 or less combos of beef trim comprise one lot, IEH's N60 Plus Sampler which consist of single combo lots, and Fremonta's MicroTally MSD cloth sampling represented by single combo lots. The minimum weight to be tested for excision is 375g. Certificate of Analysis reports accompany all tested beef trim loads. Lab method used for commercial lots is Biocontrol's GDS AOAC# 2005.04 in which a matrix extension justifies the use for Cloth Sample analysis. All laboratories used for microbiological testing are AOAC approved and accredited by the recognized International Standard ISO/IEC 17025:2005 *General Requirements for the Competence of Testing and Calibration Laboratories.* Packaged subprimals placed into commerce are microbiologically independent by means of being processed and packaged separately from other product without commingling. Boxed vacuum packaged beef subprimals are not intended for use in raw ground products. We perform carcass sampling for Generic E. coli as per 9 CFR §310.25.

INTENDED USE – Unless otherwise specified, CS Beef Packers produces intact primals/subprimal products. Meeting the definition by not needle tenderizing, grinding or otherwise enhancing any primals/subprimals produced at our facility. CS expects any customer who purchases beef primals/subprimals and then uses that product for other than intact production, to address that specific usage within their HACCP plan and have the appropriate controls in place.

January 03, 2023

HEP – CS has established a rigorous statistically based High Event Period program that mimics *FSIS Compliance Guideline for Establishments Sampling Beef Trimmings for Shiga Toxin-Producing Escherichia coli (STEC) Organisms or Virulence Markers,* August 2014. We have measures in place to prevent HEP implicated product from being released into commerce which include notification of customers.

FOOD DEFENSE – CS has a Food Defense Plan and other pre-requisite programs in place. This program assures that no article of food sold to a customer will be adulterated, or misbranded within the meaning of the Federal Food, Drug, and Cosmetic Act of 1938, the Federal Fair law; during procurement, production, storage or transportation. Product will be processed in accordance with 21 CFR §110.

INTERVENTIONS – CS has five interventions that meet requirements of FSIS Directive 7120.1 and the USDA-FSIS Interim Final Rule published in the Federal Register on January 12, 2004. All interventions are validated on a Quarterly basis. We utilize Lactic Acid (LA), Acidified Sodium Chlorite (ASC) Or Peracetic Acid (PAA) as antimicrobial processing aides at the last two locations listed below.

1. Hot Water Pre-Evisceration Carcass Wash Cabinet – DOK
2. Hot Water Carcass Wash Cabinet – DOK – CCP
3. Lactic Acid, ASC Or PAA Carcass Spray Cabinet – DOK – CCP
4. Hypobromous Acid Spray Chill – DOK/DOF
5. ASC Carcass Spray Cabinet – DOF
   LA OR ASC Trim Spray – DOF
   LA OR ASC Subprimal Spray – DOF

HUMANE HANDLING – CS complies with FSIS Directives 6900.2 and 9 CFR §313 which address Humane Handling and Slaughter of Livestock.

SRM & BSE – We produce product free from Specified Risk Materials, as defined in 9 CFR §310.22(a). SRMs have been addressed in our HACCP Plan and pre-requisite programs. We do not accept or slaughter non-ambulatory disabled livestock. We comply with FSIS Notice 56-07. CS complies with 9 CFR §309, §310, §311, §318, Directive 6100.1 and 6100.4. The SRM brain matter is addressed at the stunning process meeting requirements in 9 CFR §313.15(b)(2)(ii), (air injection stunning devices are not in use at our facility).

RUMINANT FEED BAN – CS complies with 21CFR589.2000 and 589.2001 which prohibit the feeding of ruminant meat and bone meal to ruminant animals. Records and affidavits are on file for all cattle purchased.

AMR – CS does not produce AMR (advanced meat recovery) products.

LFTB AND LGB – CS does not utilize LFTB (Lean Finely Textured Beef) and/or LGB (Lean Ground Beef strands) in any of our products, unless requested to meet customer specific specification.

ALLERGENS – CS does not utilize allergens in any of our processes.

SHELF LIFE STUDIES – Shelf life studies are performed on every new product type and when a significant change occurs. Random shelf life studies are continued on a yearly basis.

GASED PRODUCTS – CS utilizes approved product gasses to promote shelf life on fresh Overwrap product and also in Fresh Vacuum sealed packaging as part of specific customer specifications. We will utilize two types of gas mixtures; Bi-gas (LowOx) mixture of 70% N_2 / 30% CO_2 and Tri-gas (LowOx) mixture of $CO/CO_2/O_2$. Gas is metered and monitored during the use into specified product.

January 03, 2023

Sincerely,

Brandy Whitehead
FSQA Manager
CS Beef Packers
(208) 810-7510

DemKota Ranch Beef, Est. 45471
13 135th Street S.W. – Aberdeen, SD 57401
Tel 605.262.2333 Fax 605.262.2332

DEMKOTA
RANCH BEEF

JANUARY 4, 2023

To Whom It May Concern,

We continue to be committed to providing our customers with the highest quality products possible. As a part of this commitment, we continuously look at ways to improve our food safety program.

DemKota Ranch Beef is assuring we have addressed the following regulatory requirements:

- All sources of cattle comply with Title 21, Chapter 1, subchapter E, part 589 of the CFR, which prohibits the feeding of ruminant meat and bone meat to ruminant animals.
- Compliance with all BSE and SRM final rule requirements as set forth in the FSIS Notice 26-16, dated 04/26/2016.

New Angus LLC, DemKota Ranch Beef, Est. 45471 implemented an approved Hazard Analysis and Critical Control Point (HACCP) food safety system in November of 2015, which conforms to all applicable requirements set for in 9 CFR Part 417. Since its inception, we continuously reassess the program to improve the overall system and comply with all FSIS Notices and Regulations. Reassessments occur annually and on an as needed basis. Our food safety program also consists of Standard Operating Procedures (SOP's), Good Manufacturing Practices (GMP's), and Sanitation Standard Operating Procedures (SSOP's), 9 CFR 416.

We utilize a multiple hurdle approach to food safety including these intervention strategies:

- Throughout the slaughter process we inspect and trim carcasses
- Steam vacuums – placed in strategic locations on the slaughter floor
- Pre-Evisceration wash and intervention
- Thermal Pasteurization (Hot Water Wash System)
- PAA and/or Lactic Acid Application
- Variety Meat – PAA and/or Lactic Acid Application
- Intervention in Carcass Chill Spray - PAA
- Fabrication Intervention – Incoming carcasses are treated with an antimicrobial spray in the Carcass Cabinet and primal and sub-primal products are subject to an antimicrobial spray prior to bagging-PAA (Sub-primal and Trimming Sprays)
- Temperature Management

HACCP Interventions (CCP – Critical Control Points): *CCP's are designed and validated, with both scientific literature and in-house microbial data, to eliminate or reduce pathogenic microbial (E.coli* 0157:H7) *to below detectable limits.*

- Hot Water Wash – Monitored and validated on a daily basis
- Zero Tolerance for fecal, ingesta and milk contamination (Directive 6420.2)
- Carcass and Variety Meat Chilling

These intervention strategies are designed to reduce the risk of pathogenic bacteria contamination (*E.coli* O157:H7).

In addition to the above interventions we test for generic *E. coli* Biotype I (9 CFR Part 310, §310.25), Aerobic Plate Count (APC), and coliforms. Our facility is also in compliance with FSIS regulated Salmonella testing on carcasses in accordance with §310.25.

DemKota Ranch Beef is in compliance with the FDA Bioterrorism Act. DemKota Ranch Beef requires all cattle suppliers to have a current signed affidavit on file attesting to compliance with all FDA feed and drug regulations. The signed affidavit is updated on a yearly basis and cattle suppliers without an updated affidavit will not be eligible for marketing livestock to DemKota Ranch Beef.

In connection with the October 7, 2002, USDA FSIS notice on *E. coli 0157:H7* we have identified E.coli 0157:H7 in our HACCP Program as a "hazard reasonably likely" to occur. In addition, we have included interventions as critical control points in our HACCP Program (see list above) and have intensified our verification and validation procedures.

DemKota Ranch Beef has a recall plan on file that includes notification to affected customers as well as a written and monitored Pest Control Program which uses USDA approved chemicals.

DemKota Ranch Beef has reassessed its HACCP Plan and implemented the appropriate programs/policies to ensure compliance with FSIS Notice 56-07. DemKota Ranch Beef has implemented the following programs to assure our customers that our company does not produce products that contain "AMR" (Advanced Meat Recovery), downer cattle or any bone-in products that contain the spinal column in cattle age 30 months and older, and/or any other SRM material as identified in 9CFR part 309 and part 310.22.

- FSIS approved age verification and segregation of cattle programs through documentation and dentition of cattle. All carcasses identified as 30 months and over, will be marked on the complete vertebrae with blue ink (excluding the vertebrae of the tail, the transverse process of the thoracic and lumbar vertebrae, and the wings of the sacrum), segregated and ran separate from carcasses less than 30 months of age. All carcasses identified 30 months and over will have the marked vertebral column removed on the fabrication floor;
- FSIS approved downer policy that prohibits the use of non-ambulatory cattle from our edible process;
- Our company does not produce "AMR";
- Our company does not use an "air-injected" stun gun; and

- All SRM's are removed from the edible food chain (tonsils and small intestines of all cattle and from cattle 30 months of age and older the head – skull, eyes, brain, and trigeminal ganglia; and the vertebral column – spinal cord and dorsal root ganglia).

DemKota Ranch Beef is a Federally Inspected Establishment that is required to meet the requirements of 9CFR 416 and 417. These regulations ensure that our facility has verified and validated their HACCP Programs and associated CCPs. This is continually monitored by FSIS personnel who are required to do so in order for product to contain the FSIS Mark of Inspection.

DemKota Ranch Beef has addressed the following regulatory requirements:

HACCP/Pathogen Reduction Regulation Compliance

- Testing of carcasses for *E. coli* Biotype I (9 CFR Part 310, §310.25), effective June 1997. (Slaughter plants)
- Implementation of SSOP (Sanitation Standard Operating Procedures, 9 CFR, Part 416, §416.11 - §416.17), effective January 26, 1997.
- Implementation of HACCP Systems (9 CFR, Part 417, §417.1 - §417.8), effective January 27, 1998 for plants with greater than 500 employees.
- Testing of carcasses and/or ground beef for Salmonella as conducted by USDA in accordance with §310.25.

Directive 6420.2 – Issued 12/19/19

Federal Register Docket 00-022N, dated 10/7/02 (*E.coli* 0157:H7 Reassessment)

Specific to addressing regulatory requirements regarding *E. coli* O157:H7, please be advised of the following actions:

- Reassessment of HACCP plans for *E. coli* O157:H7 in accordance with the Federal Register Docket 00-022N, dated 10/7/02.
- Completion of annual reassessment of HACCP plans in accordance with 9CFR 417.4(a)(3) effective January 26, 2004.
- CCP's in place and effect for zero tolerance requirements for head meat, cheek meat and weasand. **DemKota Ranch Beef does not produce weasand meat at this time. (Effective 5/17/04).

Directive 10,010.1 – revised 08/20/15

Directives 6100.2 – revised 10/24/16 and 6100.4 – Revised 10/24/17

FSIS Notice 65-07 – 10/12/07 - HACCP Plans Reassessed Annually or As Needed

Labeling

- USDA approval for the following label disclaimer/instructional statements are available at DemKota Ranch Beef
  - ***For Cooking Only***

***E.coli* 0157:H7 CONTROLS AND TESTING**

Disposition of Tested Product

- All material destined for grinding operation is placed in DemKota Ranch Beef's Test & Hold Program using the N=60 Robust and/or N=60Plus Single Lot Combo testing methods. All tested lots are analyzed by a 3rd party accredited laboratory using an AOAC approved methodology that has been validated to meet USDA Criteria ≥98% Sensitivity and ≥90% Specificity. The items may include boneless trimmings, boneless trimming components, and/or sub-primals. All negative lots will be accompanied with a Certificate of Analysis (COA). If product is shipped prior to receiving Negative results, an agreement with the customer not to break the seal until results are received is put in place.
- One combo will be considered a lot.
- Sample will be collected using either N=60 Robust and/or N=60Plus Single Lot Combo testing methods. Samples will be tested in accordance with AOAC Official Method 996.09 through IEH.
- All materials that are tested for *E.coli* 0157:H7 that are not found to have negative results are addressed within the HACCP plans.
    - These lots are controlled, relabeled (when applicable) with the statement "For Cooking Only" and are cooked or otherwise disposed by rendering or sold as inedible.
    - Records reflect appropriate disposition of affected material.

****Vacuum packaged beef sub-primals sold in a box are not intended for use in ground products, unless the label specifies tested product.*** **If a COA is not received, the product has not been tested.**

Verification Tests for *E.coli* 0157:H7

- Trim – Quarterly verification testing for *E.coli* 0157:H7 and non-O157 STECs are conducted during the first and fourth quarters with increased testing conducted on a monthly basis during the second and third quarters
- Variety Meats - Quarterly verification testing for *E.coli* 0157:H7 and non-O157 STECs are conducted during the first and fourth quarters with increased testing conducted on a monthly basis during the second and third quarters
- DemKota Ranch Beef has a Verification and Validation microbial testing program in place. This program is an ongoing continuous testing program that specifically targets high risk areas for indicator organisms to ensure our systems are operating accurately and in a sanitary manner. This V & V program includes testing protocols that include hide on to finished product tests that demonstrate a continuous reduction in microbial presence as the carcasses move through the entire flow diagram.

Event Day Investigation

- DemKota Ranch Beef has implemented a formal risk assessment program that will evaluate plant processes, programs, and procedures immediately following an "Event Day" incident. "Event Days" are identified by statistical data compiled on daily *E.coli* 0157:H7 incidence rates. All product from the "Event Day" will be assessed for disposition.

Non-O157 Shiga Toxin producing *E.coli* (STEC)

- DemKota Ranch Beef has reassessed our HACCP plans for the Non-0157 STECs using internal testing data, scientific research (Kalchayanand, N. et all., 2012) and FSIS guidance and Notices and have determined that our current food safety systems controls that are in place at DemKota Ranch Beef addressing *E.coli* 0157:H7 are also effective in controlling the presence of Non-0157 STECs.

Allergens

- DemKota Ranch Beef, a USDA inspected facility, establishment number M-45471, does not use any allergens in any of its processes. We produce only beef products, with no additional ingredients.
- There is a potential for allergens to be in the plant due to vending machines and employee lunches, however we control these allergens through Good Manufacturing Practices, wherein no food or drink is allowed in production areas and all employees are required to wash their hands prior to entry of production areas.

DemKota Ranch Beef is committed to build a work environment that is free from human trafficking, forced labor, and unlawful child labor ('human trafficking and slavery'). We strongly believe that we are responsible for promoting ethical and lawful employment practices. These practices are also strongly recommended to be followed by our suppliers, subcontractors, and business partners.

We are continuously striving to improve our food safety systems through the implementation of new technologies and systems as they become available. However, there is no technology available today that can guarantee fresh meat products are "free of pathogens". Therefore, we want to stress the importance of proper product handling and cooking procedures by you and your customers.

Rachel Line
Director of Technical Services
Office: 605-262-2333 ext. 1087
Email: rline@demkotarb.com

DemKota Ranch Beef, Est. 45471
13 135th Street S.W. – Aberdeen, SD 57401
Tel 605.262.2333 Fax 605.262.2332

DEMKOTA
RANCH BEEF

JANUARY 4, 2023

CONTINUING LETTER OF GUARANTEE

Hereby guarantee that no product hereafter shipped or delivered to any location, store, office or warehouse of:

To Our Valued Customer:

(The "Buyer") or any subsidiary thereof, is on the date of such shipment or delivery,

(a) Adulterated or misbranded within the meaning of the Federal Foods, Drug and Cosmetic Act, as amended, including the Food Additives Amendment of 1958, to the extent said Act is then effective and applicable, or a product which may not, under the provisions of sections 404 or 505 of said Act, be then introduced into interstate commerce;

(b) Adulterated or misbranded within the meaning of any substantially similar state or municipal law or the subject, to the extent said law is then effective and applicable.

This guarantee shall not apply to misbranding arising out of the use of Buyer-applied labels.

DemKota Ranch Beef's civil liability, if any, shall be determined by its General Terms of Sale applicable to sales of said products by DemKota Ranch Beef and by normal judicial processes.

DemKota Ranch Beef agrees to indemnify, defend and hold Buyers harmless from and against any claim demand, cause of action, liability, or loss which directly or indirectly arises out of or is in any way associated with a branch of the Guarantee set forth above and which is due solely to the negligence of DemKota Ranch Beef; provided, however, that such loss shall not be a result of the negligent acts or omissions of the Buyer, its agents or employees.

This is a continuing guarantee subject to revocation at any time by written notice to the Buyer. This continuing guarantee agreement is not assignable and revokes any prior guarantee agreement between the parties.

Rachel Line
Director of Technical Services
Office: 605-262-2333 ext. 1087
Email: rline@demkotarb.com

FORTWORTH
MEAT PACKERS

Kate Miller
Fort Worth Meat Packers, COO
kate@fortworthmeatpackers.com

3801 N Grove St.
Fort Worth, TX 76106
P: 817.381.2138

January 2, 2022

LETTER OF GUARANTEE

Fort Worth Meat Packers LLC, hereinafter referred to as FWMP, is a Federally Inspected Establishment (47104/47104B) that is in compliance with USDA requirements and related FSIS Directives and Notices. FWMP is supplying this letter to clarify our Food Safety and Regulatory Compliance Programs. We participate in 3rd Party Audits, which consist of a BRC Audit, an Animal Welfare Audit, an SRM Audit and an N60 Sampling Audit. HACCP Plans and pre-requisite programs are assessed bi-annually.

HACCP – FWMP produces beef products under a Federally Approved HACCP Plan. FWMP has multiple intervention steps that meet requirements of FSIS Directive 7120.1. Our process utilizes a multiple microbial reduction strategy that maintains the highest quality of product. Our HACCP Program is designed to promote a culture of food safety within our establishment, and the process includes numerous processing aids and a validated CCP interventions. These processing steps include:

a) Steam vacuum – placed in strategic location after hide removal
b) Zero tolerance inspection
c) Hot water carcass wash for non-kosher carcasses
d) Cold water carcass wash for kosher carcasses
e) Organic acid spray post carcass wash as the carcass enters the hot box
f) Carcass Cooler Organic Acid carcass spray, as carcasses enter the fabrication floor
g) Continued cold chain management throughout the facility
h) Organic Acid intervention for offal
i) Primal, sub primal and non-intact products are subject to an antimicrobial spray after trimming and prior to packaging.

Regulatory Compliance - FWMP meets the FSIS requirements of 9 CFR 417 and 416 concerning our HACCP and SSOP programs. We continue to validate our systems through monitoring of critical limits and routine testing for pathogens.

FWMP is assuring that we have addressed the following regulatory requirements:

a) Testing of Carcasses for E. Coli Biotype I (9 CFR Part 310, 310.25)
b) Implementation of Sanitation Standard Operating Procedures (9 CFR, Part 416)
c) Implementation of HACCP Systems (9 CFR, part 417)
d) Completion of routine annual HACCP reassessment procedures (9 CFR 417.4)
e) CCP's are in place and effect for Zero Tolerance requirements (Directive 6420.2)
f) Prohibition of feeding ruminant meat and bone meal to ruminant animals (CFR Title 21 Part 589.2000)

E. Coli O157:H7 – Procedure's relative to E. Coli O157:H7 are verified with daily robust microbiological sampling using statistically justified procedures. By means of this robust sampling methodology we assure control, elimination, and/or reduction of E. Coli O157:H7 to below detectable levels.

For beef trimmings that have been identified as entering the value chain for raw ground beef production, FWMP employs a test and hold protocol to ensure no adulterated product is introduced into commerce. This protocol requires that designated trim be:

a) Lotted per chemical lean point and by volume based on production period, combo, pallet or customer request.
b) Samples are collected by N=60 Excision in which 5 or less combos of beef trim comprise one lot, unless otherwise requested. The minimum weight to be tested for excision is 375g, and samples are analyzed for E. Coli O157:H7. All laboratories used for microbiological testing are AOAC approved and accredited by the recognized International Standard ISO/IEC 17025:2005 *General Requirements for the Competence of Testing and Calibration Laboratories.*
c) Verification of lab methods are done on a routine basis in coordination with our service provider approval program.
d) All customers that request Certificates of Analysis can received a COA on tested lots.
e) All ground beef produced by FWMP is only produced from raw material that has undergone the same processing steps and is tested as described herein.
f) FWMP has established a rigorous statistically based High Event Period program that mimics *FSIS Compliance Guideline for Establishments Sampling Beef Trimmings for Shiga Toxin-Producing Escherichia coli (STEC) Organisms or Virulence Markers,* August 2014. We have measures in place to prevent HEP implicated product from being released into commerce which include notification of customers.

Animal Welfare

FWMP complies with the all of the requirements of the "Humane Methods of Slaughter Act 1978." Our Quality Assurance staff conduct weekly routine, random and unannounced audits on the live animal transport, animal handling and harvest processes. These audits are done in accordance with AMI recommendations. Audits include Stunning Efficacy, Animal Vocalization, Bleed Rail Insensibility, Electric Prod Use and Slips and Falls. In addition to the weekly internal audits, we participate in annual 3rd Party Animal Welfare audits.

We have an active downer policy that prohibits the fabrication of any downer carcasses. Animals that arrive at the facility that are non-ambulatory, unable to enter or exit the trailer on it's own power, or does not pass FSIS Antemortem inspection are segregated, the FSIS veterinarian is notified and appropriate disposition is made.

Intended Use – Unless otherwise specified, FWMP produces intact primals/subprimal products and raw non-intact trim products that are designated for raw further processing or thermal processing facilities by individual transaction status. FWMP expects any customer who purchases beef primals/subprimals and then uses that product for other than intact production, to address that specific usage within their HACCP plan and have the appropriate controls in place.

Allergens – FWMP does not utilize allergens in any of our processes.

For further policy clarification, please reach out to our technical service support staff.

Sincerely,

Kathryn Miller

Kate Miller
Chief Operating Officer

January 4, 2023

Dear Valued Customer:

JBS USA Food Company and JBS Food Canada, ULC (JBS) would like to inform you and your company of the Food Safety and Regulatory Programs, and other significant Programs which we have implemented at each of our beef harvest and/or processing locations noted below:

Regional Beef Plants	Fed Beef Plant	Canada Beef Plant
Est. 562 – Green Bay, Wisconsin	Est. 3D – Cactus, Texas	Est. 38 – Brooks, Alberta, Canada
Est. 532 – Omaha, Nebraska	Est. 969G – Grand Island, Nebraska	
Est. 562M – Plainwell, Michigan	Est. 969 – Greeley, Colorado	
Est.1311 –Souderton, Pennsylvania	Est. 628 – Hyrum, Utah	
Est. 267 – Tolleson, Arizona		

The programs outlined below have been implemented in order to comply with the United States Department of Agriculture (USDA) Food Safety and Inspection Service (FSIS) and with The Safe Food for Canadian Regulations regarding HACCP, Preventative Control Plans, and Control Measures for *Escherichia coli* O157:H7 in Raw Beef Products.

Food Safety Programs

Please be advised that each of the JBS beef facilities listed above operate under a fully implemented Hazard Analysis and Critical Control Point (HACCP) plan, which conforms to all applicable requirements set forth in 9 CFR Part 417. All products produced at these JBS facilities are subjected to these HACCP systems. Additionally, all JBS facilities perform generic *E. coli* biotype I testing on carcasses per 9 CFR 310.25 and participate in the USDA-FSIS pathogen sampling of raw beef; Canada – Export requirements for USA meat products Annex T.

Occasionally, due either to changes in the regulations, plant procedures, or nationwide information that may affect the hazard analysis or alter the critical control points, the adequacy of the HACCP Plan is reassessed as required under 9 CFR 417.4(a)(3)(i). We are in compliance with all parts of 9 CFR 417 and at a minimum, each facility re-assesses their respective HACCP plan annually.

JBS beef facilities Food Safety processes consist of Standard Operating Procedures (SOPs), Sanitation Standard Operating Procedures (SSOPs) 9 CFR Part 416, Hazard Analysis Critical Control Points (HACCP) 9 CFR Part 417, and validated technology interventions, which are designed to eliminate or reduce *E. coli* O157:H7 to below detectable levels.

1770 Promontory Circle | Greeley, CO 80634

970.506.8000

jbsfoodsgroup.com

Our Food Safety Process utilizes technology interventions (Multiple Hurdle Strategy) during harvest and fabrication which may include steam vacuums, pre-evisceration wash and/or antibacterial chemical treatment, thermal pasteurization and/or antibacterial chemical treatment (CCP), organic acid, PAA, finished product antibacterial chemical applications, and cold chain management (CCP) systems. Our variety meat / offal processing also utilize antibacterial chemical application (CCP for Red Meat Offal) and cold chain management (CCP) systems.

Our ground beef systems utilize purchase specifications that require raw materials to be pre-screened and tested negative for *E. coli* O157:H7 and have a defined cold chain management. Our Food Safety Process is monitored by Operations personnel and verified by Quality Assurance and USDA-FSIS (or CFIA) personnel in each plant. Inspection and process verification by USDA-FSIS (or CFIA) personnel occurs before the mark of inspection can be placed on products which will enter into commerce.

Prior to shipment of our products, we determine that all CCPs have been met and that our process is under control per 9 CFR 417. If our CCPs have not been met or have been found to be ineffective, corrective and preventative actions are taken as required under 9 CFR 417.3. Effectiveness of our ability to meet the Critical Limits outlined in our HACCP plan is evaluated daily through pre-shipment records review and records verification checks.

In addition, all JBS beef facilities have implemented these programs:

- A written Good Manufacturing Procedures (GMP) program.
- A Recall/Market Withdrawal Procedure, which provides for trace-back and track-forward capabilities to ensure that the proper products and dates can be identified if necessary.
- A livestock certification program which requires all cattle producers to certify compliance with 21 CFR 589.2000.
- A documented Pest Control Program.
- A documented Food Security Program (Note: details of these programs are not shared or distributed to ensure the integrity of the program.).
- All JBS beef plants are certified annually to the Global Food Safety Initiative (GFSI) standards under BRC for both food safety and quality.
- We utilize insured and bonded Carriers to Transport JBS beef products. All loads are sealed at the originating establishment and maintained under seal by the carrier in the event of a multi-stop load.

***E .coli* O157:H7 Control and Testing**

Please note that vacuum packaged beef subprimals and vacuum packaged offal red meats sold in a box are not intended for use in ground products.

1770 Promontory Circle | Greeley, CO 80634

970.506.8000

jbsfoodsgroup.com

We perform microbial testing of beef manufacturing trimmings, specially packaged sub-primals (i.e., unwrapped and bulk packed in combo), and bulk packaged offal red meats destined for direct utilization in raw comminuted finished products. Beef manufacturing trimmings (including unwrapped bulk packed sub-primals intended for further processing) that are tested for *E. coli* O157:H7, utilize a robust sampling method based on the International Commission on Microbiological Specifications for Foods (ICMSF) Case 15, two-class sampling plan for a severe hazard (i.e., N=60) or equivalent sampling method (i.e., N60 excision, N60+, or cloth). These samples (100% of sample) are analyzed by an accredited laboratory utilizing an AOAC approved methodology. Laboratory methods used have been demonstrated to be at least as sensitive and specific as the FSIS methods and MLG 5.09 (January 15, 2015), 5A.04 (June 29, 2014), and 5B.05 (June 29, 2014) and the CFIA Control Measures for *Escherichia coli* O157:NM in Raw Beef Products.

If products have been tested for *E. coli* O157:H7, shipments will be accompanied with a Certificate of Analysis (COA) indicating the results of the tests in the form of a Raw Material Notification Document (RMND), a signed letter from the plant, or a copy of the laboratory results. Test results from sampled products represent complete lots unless otherwise noted. The absence of a COA is indication that the product has either not been tested or the customer has not purchased tested products at the time of sale. If a COA is provided for *E. coli* O157:H7, then the samples that are listed in that report represent products that were produced from a system that controls both *E. coli* O157:H7 and non-O157 STECs.

Analysis of samples for *E. coli* O157:H7 is conducted by 3rd party laboratories. Respective laboratories used by each facility location along with that laboratory's accreditation information and testing methodologies are posted on our customer website (see details at the end of this letter).

Each of our establishments have a third party verification of our *E. coli* O157:H7 sampling program via an annual audit of the process that is performed between April and September. Additionally, raw material components which have previously been tested and found negative for *E. coli* O157:H7 are sampled and analyzed (*E. coli* O157:H7 and top 6 non-O157 STECs) to verify the effectiveness of our food safety systems. This sampling of beef manufacturing trimmings (including unwrapped bulk packed sub-primals intended for further processing) is conducted monthly and the results are posted quarterly on our customer website (see details at the end of this letter).

In our JBS Food Canada, ULC facility, boxed product known to be intended for raw ground use, i.e., beef trimmings from carcasses, head and cheek meat, hearts, hanging tenders and weasand meats are known to be intended for raw ground use and therefore robustly sampled utilizing N60 or equivalent methods. These products are identified by a "T" on the label within the product code on the individual boxes.

With specific regard to the ground beef products produced by all our facilities, all raw materials that will be used in the manufacture of these products are tested and found negative for *E. coli* O157:H7 prior to their use, as described in the

methods above. Notification of raw material testing is provided on a load by load basis on the Bill of Lading documents accompanying every ground beef load. External sources of raw material used by JBS Food Canada, ULC must meet or exceed JBS Food Canada ULC requirements per Supplier Addendum.

Non-O157 Shiga Toxin producing *E. coli* (STEC)

Scientific research has shown that the same interventions that are effective for controlling, reducing, or eliminating *E. coli* O157:H7 are also just as effective on the non-O157 STECs (Kalchayanand, N. et al., 2012). Industry data has proven that a production system that controls the presence of *E. coli* O157:H7 also effectively controls the presence of non-O157 STECs. Our Food Safety processes consist of Standard Operating Procedures (SOPs), Sanitation Standard Operating Procedures (SSOPs) 9 CFR Part 416, Hazard Analysis Critical Control Points (HACCP) 9 CFR Part 417, and validated technology interventions, which are designed to eliminate or reduce *E. coli* O157:H7 to below detectable levels; hence, controlling the non-O157 STEC levels to the same degree. It is the opinion of JBS that testing beef manufacturing trimmings and ground beef for non-O157 STECs would not increase the robustness of our food safety programs. Therefore, we will not test our beef manufacturing trimmings or ground beef for the non-O157 STECs.

Event Program

Even with exhaustive interventions, processes, and testing; unfortunately, non-negative results are sometimes obtained. JBS evaluates each non-negative event to determine if the level of non-negative results in any given production period or day exceed statistically acceptable levels. If it is determined that the non-negative results constitute an "Event", products produced before, within, and after the associated period or day are evaluated and appropriate disposition is made.

Beef Subprimal Antimicrobial Treatment

Our beef facilities apply multiple antimicrobial treatments to carcasses and primals/subprimals after the final slaughter Critical Control Point (CCP) intervention. Our facilities apply an antimicrobial solution to the subprimals and trimmings at the end of the fabrication process prior to packaging.

The antimicrobial treatments utilized are approved by USDA-FSIS as 'processing aids' and comply with the approval issued in Directive 7120.1 for use and labeling or by CFIA / Health Canada. These 'processing aids' have been validated through in-house sampling of generic microorganisms. Although these process aids are employed by all plants as a part of our multiple hurdle food safety approach, they are not defined as critical control points in our HACCP plans.

Additional Information

1770 Promontory Circle | Greeley, CO 80634

970.506.8000

jbsfoodsgroup.com

Our U.S.A. facilities are USDA-FSIS inspected establishments. Each animal slaughtered and processed at our facilities undergoes ante mortem and postmortem inspection by FSIS personnel, who determine which carcass and parts are free of disease and are wholesome.

JBS Food Canada, ULC is a licensed food business that CFIA verifies is compliant to the Safe Food for Canadian Regulations (SFCR), HACCP, and PCP requirements. By applying the Mark of Inspection, we are obligated to adhere to all applicable requirements contained therein.

Our U.S.A facilities have a comprehensive PCP (Preventive Control Program) in place, which includes a HACCP program, and meet the SFCR (Safe Food for Canadian Regulations) requirements and are eligible to export beef products to Canada.

JBS USA Food Company facilities comply with FSIS Directive 10,800.1 (rev.1), March 3, 2014, entitled "Residue Sampling. Testing and Other Verification Procedures under the National Residue Program for Meat and Poultry Products."

In addition to the above, our process also includes a continuing product guarantee, which we provide to our customers upon request. Our Bill of Lading contains statements regarding HACCP Programs and SRM control.

Our food safety systems have been validated to show at least a 3 log reduction throughout our process.

JBS USA Food Company is compliant to USDA-AMS-ARC regulations based on an export country's specific requirements – view approval at website: https://www.ams.usda.gov/services/imports-exports/bovine-ovine-and-caprine-export-verification-programs.

You are cordially invited to visit our facilities and review our processes, with proper notification provided through your Sales Representative or other JBS contact. We trust this information is useful to you and we look forward to serving you as a customer and as a partner of JBS.

We hope that you find this information useful in reassessing your programs with regard to the above mentioned regulations. The most recent version of this letter and other related food safety information can be found under 'Our Business – Beef – Food Safety – Food Safety Log In' on our www.jbsfoodsgroup.com website located at: https://foodsafety.jbssa.com

We look forward to continuing to provide you with wholesome, quality products.

1770 Promontory Circle | Greeley, CO 80634

970.506.8000

jbsfoodsgroup.com

If you need additional information, please contact the respective Beef Food Safety Team:

Regional Beef

Sherri Trujillo	970-506-8153	Sherri.Trujillo@jbssa.com
Scott Leach	970-506-7542	Scott.Leach@jbssa.com
Ryan Algino	970-506-7502	Ryan.Algino@jbssa.com
Corri Piper	970-506-7691	Corri.Piper@jbssa.com

Fed Beef

Brian McFarlane	970-304-7022	Brian.McFarlane@jbssa.com
Kimberly Cook	970-347-5573	Kimberly.Cook@jbssa.com
Mark DeRaad	906-421-8236	Mark.DeRaad@jbssa.com
Timothy Delaney	308-395-9135	Timothy.Delaney@jbssa.com

Canada Beef

Warren Klymchuk	403-501-2144	Warren.Klymchuk@jbssa.com
Rigoberto Garcia Hernandez	403-501-2264	Rigoberto.GarciaHernandez@jbssa.com

Export Programs Director

Travis Arp	970-347-5523	Travis.Arp@jbssa.com

Respectfully,

Sherri Trujillo
Technical Services
JBS USA FOOD COMPANY

Reference: Kalchayanand N, Arthur T, Bosilevac J, Schmidt J, Wang R, Shackelford S, and Wheeler T. 2012. Accepted *J. Food Protection*. Evaluation of Commonly Used Antimicrobial Interventions for Fresh Beef Inoculated with Shiga toxin-producing *Escherichia coli* serotypes O26, O45, O103, O111, O121, O145, and O157:H7.

Statement of Commitment

Audit Date:
October 24, 2022

Audit Score:
84

Expiration Date:
November 08 2023

Grupo Gusi S.P.R. de R.L. de C.V.

Carretera Tamuin - San Vicente km. 12.5, Tamuin, San Luis Potosí, Mexico- 79200

Audit: 3139183 / **Visit:** 2571312

This document demonstrates that Grupo Gusi S.P.R. de R.L. de C.V. has shown commitment to food safety through the successful completion of the:

BSE Firewalls and SRM Assessment Addendum (Spanish)

as well as through the submission of effective corrective action responses to the non-conformances identified during the audit.

Signed on behalf of
NSF International

Sarah Krol
Senior Managing Director,
Global Supply Chain

NSF International
789 N. Dixboro Road, Ann Arbor, MI 48105 USA

Statement of Commitment

Audit Date:
October 24, 2022

Audit Score:
98.0

Expiration Date:
November 08, 2023

Grupo Gusi S.P.R. de R.L. de C.V.

KM 25 + 100, Carretera Federal La Tinaja - Cd. Alemán, Tierra Blanca, Veracruz, Mexico- 95100

Audit: 3139182 / **Visit:** 2571312

This document demonstrates that Grupo Gusi S.P.R. de R.L. de C.V. has shown commitment to food safety through the successful completion of the:

Beef E.coli O157:H7 Addendum (Spanish)

as well as through the submission of effective corrective action responses to the non-conformances identified during the audit.

Signed on behalf of
NSF International

Sarah Krol
Senior Managing Director,
Global Supply Chain

NSF International
789 N. Dixboro Road, Ann Arbor, MI 48105 USA

Statement of Commitment

Audit Date:
October 24, 2022

Audit Score:
PASS

Expiration Date:
November 08, 2023

Grupo Gusi S.P.R. de R.L. de C.V.

Carretera Tamuin - San Vicente km. 12.5, Tamuin, SLP 79200, MEX

Audit: 3139192 / **Visit:** 2571312

This document demonstrates that Grupo Gusi S.P.R. de R.L. de C.V. has shown commitment to food safety through the successful completion of the:

North American Meat Institute (NAMI)

as well as through the submission of effective corrective action responses to the non-conformances identified during the audit.

Signed on behalf of
NSF International

Sarah Krol
Senior Managing Director,
Global Supply Chain

NSF International
789 N. Dixboro Road, Ann Arbor, MI 48105 USA

Certificate of Registration

Certificate of Registration Number:
C0179031-FC15

Date of the Certification Decision:
25-JUL-2022

Initial Certification Date:
27-JUN-2014

Reissuing Date:
27-JUL-2022

Valid Until:
27-JUN-2023

The Food Safety Management System of

Grupo Gusi, S.P.R. de R.L. de C.V.

Carretera Tamuin, San Vicente KM 12.5 Tamuin, 79200 Mexico

has been assessed and complies with the requirements of

Food Safety System Certification 22000 FSSC 22000

Certification scheme for food safety management systems consisting of the following elements:

ISO 22000:2018, ISO/TS 22002-1:2009 and Additional FSSC 22000 requirements (version 5.1)

This certificate is applicable for:

Slaughter, production of frozen or chilled, raw or enhanced (marinated) primary beef cuts, frozen beef burgers, enhanced (marinated) beef cuts, portioned cuts of meat, sausage ground beef, and frozen or chilled viscera.

Authorized by:

Jennifer Morecraft
Senior Managing Director
NSF-ISR

Exclusion:
Sausage and skin (hide) processing

CI. Process of Perishable Animal Products

ANAB ACCREDITED ISO/IEC 17021 MANAGEMENT SYSTEMS CERTIFICATION BODY

Issued by:

NSF International Strategic Registrations (NSF-ISR)
789 N. Dixboro Road, Ann Arbor, MI 48105 USA

FSSC 22000

*Company is audited for conformance at regular intervals. To verify registrations call (888) NSF-9000 or visit our web site at www.nsf-isr.org

Validity of this certificate can be verified in the FSSC 22000 database of certified organizations available on www.fssc22000.com.

GRUPO GUSI
S. de P.R. de R.L. de C.V.

Carretera Tamuin – San Vicente Km. 12.5, Tamuin, San Luis Potosí C.P. 79200
www.grupogusi.com
Tel. +52 489 388 3000

Tamuin, San Luis Potosí, january 04, 2023

ANIMAL WELFARE AND HUMAN HANDLING STATEMENT

Dear Valued Customer

Grupo Gusi, S.P.R. de R.L. de C.V., TIF Establishment # 388 located in Carretera Tamuin - San Vicente Km. 12.5, Tamuin, San Luis Potosí, México, C.P. 79200, ensures that the animals under our care raised in an environment that satisfies their physical, nutritional and health requirements.

All employees involved in handling livestock have been trained to follow the "Recommended Animal Handling Guides" published by AMI.

Our Animal Welfare and Human Handling procedures are developed to ensure compliance with all applicable legal and regulatory requirements.

Grupo Gusi is audited on an annual basis by an independent 3rd party Professional Auditor trained under PAACO regulations.

In addition, Grupo Gusi completes internal daily monitoring audits to ensure animal handling requirements are continuously met.

The latest animal welfare audit applied by the third-party agency to Gusi Group was in October 2022, the obtained score reflect that the company has affectively implemented an Animal Handling and Welfare program at the slaughterhouse according to the Animal Handling Guidelines as recommended by the American Meat Institute (AMI), to the applicable international Animal Welfare Regulations and the Best Industry Practices, all the numerical items were found in compliance.

Sincerely

GRUPO GUSI
S. de P.R. de R.L. de C.V.
R.F.C. GGS 921106 IB4
CARR. TAMUIN-SAN VICENTE KM. 12.5
TAMUIN, S.L.P. C.P. 79200

DVM. Alvaro Cervantes Tenorio
Quality Control and Food Safety Manager
Grupo Gusi, S.P.R. de R.L. de C.V.
E-mail. alvaro.cervantes@grupogusi.com
Office. +52 489 388 3000 Ext. 2251
Mobile. +52 1 481 116 8867

GRUPO GUSI
S. de P.R. de R.L. de C.V.

Carretera Tamuin – San Vicente Km. 12.5, Tamuin, San Luis Potosí, C.P. 79200
www.grupogusi.com
Tel. +52 489 388 3000

Tamuin, San Luis Potosí, january 04, 2023

E. COLI O157:H7 AND NON O157 STEC STATEMENT

Dear Valued Customer

Grupo Gusi, S.P.R. de R.L. de C.V., TIF Establishment # 388 located in Km. 12.5 Carretera Tamuin - San Vicente, Tamuin, San Luis Potosí, México, C.P. 79200, is committed with the food safety and quality of our products.

All our processes and facilities follow all SAGARPA and FSIS regulations, as appropriate and are operating under a fully implemented Hazard Analysis and Critical Control Points (HACCP) Plan, which meets all requirements set forth in 9 CFR 417.

As requested by FSIS (Notice 63-12) our Hazard Analysis does consider *E. coli* O157:H7 and the six additional Non O157 Shiga Toxin *E. coli (O26, O45, O103, O111, O121 and O145)* as a food safety hazard reasonably likely to occur.

Grupo Gusi, uses a multiple pathogen reduction intervention that includes:

- Hide-On Carcass Wash.
- Steam pasteurization.
- Steam vacuums.
- Peryoxacetic acid prior to packaging of sub primal beef cuts.

Peryoxacetic acid is recognized by USDA FSIS (Directive 7120.1) as a "processing aid" therefore, there is no implication to labeling or including it in the ingredient statement.

Grupo Gusi utilizes both 3rd party accredited and internal laboratory to conduct the *E. coli O157:H7 and Non O157 STEC* tests.

Our internal laboratory has implemented a PCR based test method approved by FSIS for *E. coli* O157:H7 and Non O157 STEC determination.

Grupo Gusi receives third party audits to verify our *E. coli O157:H7* sampling program, under this verification program, raw ground beef components are ground, sampled and analyzed to ensure the effectiveness of sampling technique, the most recent third-party audit was conducted in October 2022, as result of the audit Grupo Gusi received the E. coli addendum, which is available upon request.

Sincerely

GRUPO GUSI
S. de P.R. de R.L. de C.V.
R.F.C. GGS 921106 IB4
CARR. TAMUIN-SAN VICENTE KM. 12.5
TAMUIN, S.L.P. C.P. 79200

DVM. Alvaro Cervantes Tenorio
Quality Control and Food Safety Manager
Grupo Gusi, S.P.R. de R.L. de C.V.
E-mail. alvaro.cervantes@grupogusi.com
Office. +52 489 388 3000 Ext. 2251
Mobile. +52 1 481 116 8867

GRUPO GUSI
S. de P.R. de R.L. de C.V.

Carretera Tamuin – San Vicente Km. 12.5, Tamuin, San Luis Potosí, C.P. 79200
www.grupogusi.com
Tel. +52 489 388 3000

Tamuin, San Luis Potosí, january 04, 2023

E. COLI AND HACCP GUARANTEE LETTER

Dear Valued Customer

Grupo Gusi, S.P.R. de R.L. de C.V., TIF Establishment # 388 located in Km. 12.5 Carretera Tamuin - San Vicente, Tamuin, San Luis Potosi, México, c.p. 79200, is committed with the food safety and quality of our products. All our processes and facilities follow all SAGARPA, CFIA and FSIS regulations, as appropriate and operate under a fully implemented Hazard Analysis and Critical Control Points (HACCP) Plan, which meets all requirements set forth in 9 CFR 417, additionally, have in place Sanitation Standard Operating Procedures (SSOPs) that meet all requirements of 9 CFR 416.

As requested by FSIS (Notice 63-12) our Hazard Analysis does consider *E. coli* O157:H7 and the six additional Non O157 Shiga Toxin *E. coli (O26, O45, O103, O111, O121 and O145)* as a food safety hazard reasonably likely to occur.

Grupo Gusi uses a multiple pathogen reduction intervention that include:

- Hide-On Carcass Wash.
- Steam pasteurization.
- Steam vacuums.
- Peryoxacetic acid prior to packaging of sub primal beef cuts.

Peryoxacetic acid is recognized by USDA FSIS (Directive 7120.1) as a "processing aid" therefore, there is no implication to labeling or including it in the ingredient statement. The effectiveness of this agent is constantly verified through the implementation of microbiological indicators.

In addition, we perform extensive microbiological tests on carcasses and other beef products that serve as verification that the intervention system is working as designed.

Our slaughter facility participates in the competent authority (SAGARPA) official *Salmonella* performance standard sampling.

We also do sample carcasses for generic *E.coli* using the protocol designed in accordance with the requirements stated in 9 CFR 310.25

Furthermore, Grupo Gusi has supporting prerequisite programs encompassing:

- Good Manufacturing Practices (GMP´s).
- Recall and traceability procedure to ensure proper identification for all products coming into/through the system and leaving the system.
  * These procedures are practiced at a minimum of annually to ensure effectiveness in the ability to trace all products and ensure all team members are competent in their roles.
- Pest Control Program.
- Management of Supplied Materials.

GRUPO GUSI
S. de P.R. de R.L. de C.V.

Carretera Tamuin – San Vicente Km. 12.5, Tamuin, San Luis Potosí, C.P. 79200
www.grupogusi.com
Tel. +52 489 388 3000

Tamuin, San Luis Potosí, january 04, 2023

E. COLI AND HACCP GUARANTEE LETTER

- Food Defense Program.
  - Company access is controlled, fenced and guarded.
  - All production facilities access is restricted and controlled.
  - Food defense procedures are reviewed on an annual basis.

Grupo Gusi S.P.R. de R.L. de C.V. have been obtained certification under an approved Global Food Safety Initiative (GFSI) standard, in addition our facility is annually evaluated by a 3rd party auditing firm for E. coli addendum, Animal Welfare and Specified Risk Material (SRM).

A summary of audit scores is available upon request.

Grupo Gusi, continues to improve our implemented food safety programs and considering the use of new technologies that will enhance product safety.

For additional information please visit our website grupogusi.com.mx or contact us at +52 489 388 3000 Ext. 2251.

Sincerely

DVM. Alvaro Cervantes Tenorio
Quality Control and Food Safety Manager
Grupo Gusi, S.P.R. de R.L. de C.V.
E-mail. alvaro.cervantes@grupogusi.com
Office. +52 489 388 3000 Ext. 2251
Mobile. +52 1 481 116 8867

GRUPO GUSI
S. de P.R. de R.L. de C.V.
R.F.C. GGS 921106 IB4
CARR. TAMUIN-SAN VICENTE KM. 12.5
TAMUIN, S.L.P. C.P. 79200

GRUPO GUSI
S. de P.R. de R.L. de C.V.

Carretera Tamuin – San Vicente Km. 12.5, Tamuin, San Luis Potosi, C.P. 79200
www.grupogusi.com
Tel. +52 489 388 3000

Tamuin, San Luis Potosí, january 04, 2023

SPECIFIED RISK MATERIALS AND NON-AMBULATORY ANIMALS STATEMENT

Dear Valued Customer

Grupo Gusi, S.P.R. de R.L. de C.V., TIF Establishment # 388 located in Km. 12.5 Carretera Tamuin - San Vicente, Tamuin, San Luis Potosí, México, C.P. 79200, is committed with the food safety and quality of our products.

Our facilities operate under a segregation procedure for specified risk materials that includes:

- Tonsils and spinal cords are removed from all carcasses.
- Skull including brains, eyes, and trigeminal ganglia from all cattle 30 months or older are condemned and destroyed by a third-party company.
- Carcasses are segregated according to age based on the guidelines presented in FSIS-2007-0015 to ensure proper disposal of SRM´s from cattle 30 months or older.
- Eighty inches of small intestine including the distal ileum as measured from the ileocecal junction is discarded to rendering.
- No air injection stunning is used.

Our facilities have the necessary equipment and an implemented program to ensure the complete removal of specified risk materials considered for bovine spongiform encephalopathy.

Grupo Gusi receives third-party audits to verify the correct implementation of Bovine Spongiform Encephalopathy requirements

The most recent third-party audit was conducted in October 2022, the obtained score reflect that the company have effectively implemented a BSE Firewalls program controlling the Specified Risk Material according to common international regulations and the Best Industry Practices.

Grupo Gusi meets all FSIS requirements for Non- Ambulatory Disabled Cattle, reason for which the cattle prohibited for slaughter in our facilities includes:

- Dead or dying.
- Showing clinical signs of Central Nervous System Disorder
- Non-ambulatory disabled cattle.

Sincerely

GRUPO GUSI
S. de P.R. de R.L. de C.V.
R.F.C. GGS 921106 IB4
CARR. TAMUIN-SAN VICENTE KM. 12.5
TAMUIN, S.L.P. C.P. 79200

DVM. Alvaro Cervantes Tenorio
Quality Control Manager
Grupo Gusi, S.P.R. de R.L. de C.V.
E-mail. alvaro.cervantes@grupogusi.com
Office. +52 489 388 3000 Ext. 2251
Mobile. +52 1 481 116 8867

Mérieux NutriSciences
CERTIFICATION

Audit Participation

Comercializadora e Indistrializadora Agropecuaría, S.A de C.V.

Completó una auditoría

Animal Welfare Beef with Addendum SRM and Fresh Beef E. coli

Obteniendo una calificación de

92 %

Fecha 15 y 16 Diciembre 2022

Martin R. Farnell

Director de Servicios de Auditoría

Better Food.
Better Health.
Better World.

Mérieux NutriSciences
Electrón 28 | Parque Industrial Cition | Naucalpan | Estado de México | 53470 | México
Tel: +52 (55) 5273.5077 www.merieuxnutrisciences.com/na/es/

COMERCIALIZADORA E INDUSTRIALIZADORA AGROPECUARIA S.A. DE C.V. TIF 353

GUARANTEE LETTER

COMERCIALIZADORA E INDUSTRIALIZADORA AGROPECUARIA S.A DE C.V. TIF 353 is dedicated to food safety. We produce meat products in compliance with the Hazard Analysis and Critical Control Point (HACCP) requirements set forth in Title 9 Ch III Part 417 of the Code of Federal Regulations, as well as the Sanitation Standard Operating Procedures outlined in Title 9 Chapter III Part 416. All beef products are produced in compliance with good manufacturing practices for USA and Canada regulation and are not misbranded or adulterated. We certify SQF. Certificate Number: 31676.

FOOD SAFETY, HACCP AND E-COLI.

COMERCIALIZADORA E INDUSTRIALIZADORA AGROPECUARIA S.A DE C.V. TIF 353 Food Safety processes consist of Standard Operating Procedures (SOPs), Sanitation Standard Operating Procedures (SSOPs) 9 CFR Part 416, Hazard Analysis Critical Control Points (HACCP) 9 CFR Part 417, which are reassessed annually in compliance with FSIS Directive 10010.1 Revision 4, and validated technology interventions, which are designed to eliminate or reduce *E. coli* O157:H7 & STEC (*Shiga Toxin-Producing Escherichia coli),* to below detectable levels. Our Food Safety Process utilizes technology interventions (Multiple Hurdle Strategy) using 3 intervention steps during harvest and fabrication which include chemical treatment, organic acid applications, finished product organic acid applications, and cold chain management.
Safety Process is monitored by Operations personnel and verified by Quality Assurance personnel.

Event Program.

While we perform interventions and testing, there is no available technology which can guarantee that fresh meat products are "free of pathogens". COMERCIALIZADORA E INDUSTRIALIZADORA AGROPECUARIA S.A DE C.V. TIF 353 evaluates each non-negative event to determine if the level of non-negative results on any given production day or production period exceeds statistically determined levels. If it is determined that the non-negative results constitute an “Event”, an evaluation of products produced within the associated time or day is conducted and appropriate disposition is made of any potentially affected product.

BSE, SRMs.

COMERCIALIZADORA E INDUSTRIALIZADORA AGROPECUARIA S.A DE C.V.TIF 353 has developed and maintains a prerequisite program designed to ensure the complete removal, segregation, and disposal of Specified Risk Materials (SRMs) as required by 9 CFR 310.22(e) and FSIS Directive 6100.4.

I. The brain, skull, eyes, trigeminal ganglia, spinal cord, the distal ileum of the small intestine, and the tonsils of all cattle, regardless of age are removed during harvest and made inedible to prevent subsequent contact between SRMs and any edible meat products.

II. In order to ensure complete removal of the dorsal root ganglia, the vertebral column of cattle aged 30 months or older (excluding the vertebrae of the tail, the transverse processes of the thoracic and lumbar vertebrae and the wings of the sacrum) will be removed from the carcass during fabrication and disposed of as inedible product unless the customer specifically requests for us not to do so.

III. For customers who wish to purchase products containing the vertebral column that are derived from cattle 30 months of age or older, special procedures to ensure compliance with 9 CFR 310.22(g) will be implemented on a case by case basis.

IV. COMERCIALIZADORA E INDUSTRIALIZADORA AGROPECUARIA S.A DE C.V.TIF 353 has written procedures designed to identify the age of harvested cattle that are 30 months of age or older. The age of cattle that do not have an acceptable form of age identification presented with the animal at the time of slaughter is determined by using dentition guidelines provided by USDA-FSIS in Directive 6,100.4.

V. All cattle determined to be 30 months of age or over are identified and segregated to ensure proper disposal of their associated SRMs.

VI. COMERCIALIZADORA E INDUSTRIALIZADORA AGROPECUARIA S.A DE C.V. TIF 353 uses has implemented procedures to clean and sanitize equipment before its use on cattle younger than 30 months of age as required by 9 CFR 310.22(f)

VII. As per 9 CFR 313.15(b)(2)(ii) the use of captive bolt stunners that deliberately inject compressed air (air injection stunning) into the cranium at the end of a penetration cycle are not used to stun cattle in our facility.

COMERCIALIZADORA E INDUSTRIALIZADORA AGROPECUARIA S.A. DE C.V. TIF 353

FOOD DEFENSE, BIO SECURITY.

COMERCIALIZADORA E INDUSTRIALIZADORA AGROPECUARIA S.A DE C.V.TIF 353 has developed a Food defense (and Bio Security for harvesting facilities) plan which is tested for effectiveness once per year.

RECALL AND WITHDRAWL.

COMERCIALIZADORA E INDUSTRIALIZADORA AGROPECUARIA S.A DE C.V.TIF 353 maintains its own documented recall program, which is tested at least once per year for effectiveness.

ANIMAL WELFARE.

COMERCIALIZADORA E INDUSTRIALIZADORA AGROPECUARIA S.A DE C.V.TIF 353 maintains a written and employed animal welfare program which is audited by third party annually.

24 HOUR EMERGENCY CONTACT LIST

NAME	PHONE NUMBER	POSITION WITH COMPANY
Jorge Yamil Vallejo Murillo	52+1 2291614194	Plant Manager
Cruz Miguel Morales Sánchez	52+1 2291614654	Second Plant Manager
Eduardo Álvarez Cid	52+1 2297809150	Marketing Manager
Jose Andres Cantu Barrón	52+1 2294651407	Exports Manager

Date: January 7, 2023
Signed: Jose Christian Solano Noriega
Position: QA Manager

NEBRASKA BEEF, LTD.
4501 S. 36th Street, Omaha, NE 68107
(402) 733-1711

January 6, 2023

HACCP Food Safety Letter of Guaranty

Dear Valued Customer:

Nebraska Beef hereby states that each and every edible article contained in and comprising each shipment, is guaranteed at the time and place of such shipment, to be not adulterated or misbranded within the meaning of the U.S. Federal Meat Inspection Act and the U.S. Federal Food, Drug and Cosmetic Act. The programs and initiatives implemented and maintained within our Food safety system are as follows;

1. Nebraska Beef is a USDA inspected establishment (EST# 19336) and is eligible to export to over 13 countries including both Canada and Mexico.
2. The HACCP process descriptions utilized at NB are "Beef Slaughter" and "Raw—Not Ground." Both HACCP plans have been validated by in-plant scientific studies with on-going verification procedures conducted daily. These HACCP plans are maintained on file within our establishment and are available for in-plant customer review upon request and visitation.
3. As a high speed live bovine harvesting facility, Nebraska Beef identifies *E. coli* O157:H7 as a hazard reasonably likely to occur, because it can potentially occur on the hides and the intestinal tract. Therefore, NB utilizes a total of eight (8) antimicrobial intervention cabinets from hide off carcasses, through the finishing of whole muscle and beef trim fabrication. Each intervention treatment is validated to reduce *E. coli* O157:H7, Non O157 STEC, and *Salmonella* to below detectable levels. Four (4) of the eight treatments are identified as critical control points (CCP) in the HACCP Plan.
4. The finished products provided are single ingredient raw beef items (various cuts) packed in boxes or corrugated combos. All of these raw beef items meet the USDA definition of the "Natural" claim in that it contains no artificial ingredients and is minimally processed.
5. No Big 8 allergens are contained within the single ingredient raw beef items supplied.
6. All single ingredient raw beef is Gluten-Free.
7. Daily Generic *E. coli* testing of carcasses per 9 CFR 310.
8. Sanitation Performance Standards per 9 CFR 416. 1 through 416.6.
9. Sanitation Standard Operating Procedures (SSOP) per 9 CFR 416. 11 through 416.16.

10. Hazard Analysis and Critical Control Points Systems (HACCP) per 9 CFR 417. Hazards considered in our Hazard Analysis include Biological, Physical, Chemical and Radiological.
11. Routine Salmonella testing conducted during validation periods, and regularly by USDA, FSIS pathogen sampling protocols.
12. Reassessment of HACCP system performed annually as required by 9 CFR 417.4 (a) (3), when there is an occurrence of unforeseen hazards, and in response to new USDA and/or company policies that may impact the food safety process. NOTE: USDA Policies are Regulations, Directives, Notices, memorandums, etc.
13. Non-ambulatory disabled livestock (downers) are ineligible for slaughter.
14. NB utilizes only captive bolt stunning equipment—no air-injected stunners are used.
15. NB implements a program which ensures the proper removal, segregation, and disposal of all Specified Risk Materials (SRM) of bovine animals in accordance with 9 CFR 310.22.
16. The vertebral columns of all ≥ 30 months of age cattle are removed during the fabrication process, which ensures that no bone in Beef Loin and Ribs from ≥ 30 months of age cattle enters into commerce (specifically—feather, chine, and vertebral bones).
17. Product prepared using advanced meat recovery system (AMR) is properly labeled and tested daily for *E. coli* O157:H7, monthly for calcium content/added iron, and weekly for central nervous system tissue (CNS) per 9 CFR 318.24. NB does not harvest mechanically separated meat from the skull and vertebral column of bovine animals aged 30 months or older.
18. 50/50 Beef Trimmings are produced at 50% Lean ± 2% and is derived from cattle of domestic origin only (Product of USA). Combos are standard 46' in height with an average weight of 2,000 lbs. and boxed 50/50 trimmings are packaged in industry standard 60 lb. wax lined boxes (acceptable for product contact).
19. Utilize a 2-combo lot at N=60 sampling plan for all raw beef intended for grinding under strictly enforced "Test and Hold" procedures.
20. High Event Program (HEP)—based on the 5% probability table as outlined in the August 2014 FSIS compliance guidance document for Sampling of Beef Trimmings, when more than 5% of beef trim lots intended for non-intact use test presumptive positive, all trim (Intended for Non-Intact Use) produced on that day will be diverted from non-intact use and rendered a proper disposition per FSIS Directive 10,010.1. In addition, all whole muscle associated with presumptive positive trim lots will be retained and either tested for *E. coli* STEC pathogens or diverted to cooking under strict controls.
21. Physical lots are defined as one day's production of like/grade product. Example: *Prime Boneless Ribeye's produced on 5/1/21—1 Lot, Choice Boneless Ribeye's produced on 5/1/21—1 Lot, Select Boneless Ribeye's produced on 5/1/21—1 Lot, etc.* However, each individually packaged primal and/or sub primal has gone through a validated intervention and has not been "commingled" before packaging. Thus, each individual package is microbiologically independent in accordance with USDA, FSIS Guidelines.

Note: in the rare event that unavoidable commingling of sub-primals occurs at our establishment, we maintain a re-conditioning procedure that includes passing these cuts through a validated anti-microbial treatment and ensuring that no commingling occurs after this treatment.

22. Whole muscle products packed in individually cryovac packages are not intended for conversion to non-intact products unless a COA is provided (upon customer request only). Subsequently, all Bill of Ladings are stamped with the phrase, *"Our Primal and sub-primal Cuts of Beef are intended for Raw Intact Use Only."* However, if a customer makes a conscious decision to convert either the sub-primals or bench trim to non-intact items, there is an expectation that they utilize either a validated anti-microbial intervention or additional quality step in their process to address the relative pathogens of concern.
23. All packaging materials are acceptable food grade wrappings. Supplier guarantees and SDS are part of our supplier approval program per GFSI standards and are on file at our establishment.
24. All pathogen testing of beef trim performed by a third-party laboratory utilizing the PCR BAX method.
25. All beef trim test results are daily reviewed for anomalies and used to investigate potential process control issues.
26. Quarterly verification testing for *E. coli* O157:H7 on trim and variety meats.
27. Utilization of organic and/or inorganic acid interventions on Carcasses, variety meats, trim, and whole muscle that are validated to reduce *E. coli* O157:H7, Non-O157 STEC, and *Salmonella* to below detectable levels.
28. Utilization of a hot water pasteurization treatment on carcasses that is validated to reduce *E. coli* O157:H7, Non-O157 STEC, and *Salmonella* to below detectable levels.
29. All products are refrigerated throughout the process in order to maintain cold chain and prevent bacterial proliferation.
30. All cattle slaughtered by NB have been fed rations that do not contain prohibited meat and bone meal per 21 CFR 589.2000/2001. Our establishment maintains Livestock Owner certificates signed by every cattle supplier certifying compliance.
31. Chemical Residues (antibiotics, hormones etc.)—All cattle suppliers issue a signed Livestock Owner Certificate stating that all veterinarian treatments are administered in prescribed amounts, by trained individuals, and proper withdrawal times are strictly adhered to. USDA, FSIS conducts weekly residue sampling at our facility to verify compliance. All raw beef materials are free of pesticides, mycotoxins and other contaminates which could be harmful to humans or animals. Our single ingredient raw beef products contain no Clenbuterol, Ractopamine and Salbutamol.
32. Blood collection methods are compliant with 9 CFR 310.20.
33. NB has developed, and daily implements a written program consistent with a systematic approach to the humane handling of all livestock. The program meets all requirements of both the NAMI guidelines and the Humane Slaughter Act and is audited annually by an independent third-party auditing

firm. In addition, NB maintains on staff two (2) PAACO Certified auditors who are responsible for proper Animal Welfare oversight.

34. NB complies with FDA/USDA/AMS'S food security requirements for both domestic and international sales. Compliance with the Public Health Security & Bioterrorism Preparedness & Response Act of 2002 (FDA Registration #13903406494).
35. NB maintains a written Food Defense program that is assessed annually.
36. Maintains a written comprehensive recall strategy that conducts traceability exercises twice a year (trace forward and trace back).
37. Annual third-party audits are conducted for Animal Welfare and GFSI (BRC Certified—Grade AA+—Highest rating possible).
38. NB slaughters only cattle of domestic origin. Pursuant to the COOL mandate outlined in 7 CFR § 65.500, all covered commodities are labeled *"Born, Raised, and Harvested in the United States."*
39. NB hiring practices meets all requirements of the California Transparency in supply Chains Act of 2010.
40. Nebraska Beef fully complies with California's Proposition 65 (Safe Drinking Water and Toxic Enforcement Act) in that all single ingredient raw beef items produced by NB does not contain any chemicals listed on the Proposition 65 list of chemicals.
41. NB has developed both sustainability and environmental impact policies that are strictly implemented and maintained daily.
42. Pursuant to section 5.4.2 of the GFSI (BRC) standards for food safety and quality, a vulnerability assessment was conducted to assign a risk factor for weaknesses in the supply chain in order to prevent food fraud. This assessment considered controls in place, with measured assurances of the controls along with historical evidence. The result rendered a low risk for fraud.
43. All customers will be allowed access to our facility for programs and records review.
44. Emergency Contacts are as follows;

Primary	**Secondary**
Emile Randazzo—VP of Reg. Affairs/QA	Tony Joy—VP of Operations
Wk.: 402-733-1711/Cell: 402-578-8110	Wk.: 402-733-0418/Cell: 402-290-9213
edazzo@nbeef.com	tjoy@nbeef.com

Our mission at Nebraska Beef is a commitment to food safety and a dedication to the production of the highest quality beef that is both safe and wholesome for our customers and their consumers. As a customer of Nebraska Beef, we thank you for your interest and continued business and if there is any additional information you need, please do not hesitate to contact me.

Sincerely,

Emile Randazzo

Emile Randazzo
VP of Regulatory Affairs, 402-733-1711, **edazzo@nbeef.com**

CONTINUING GUARANTEE

The undersigned, OWB Packers, Est. 21488 hereby states that each and every angle contained in and comprising each shipment or other delivery hereafter by Seller, is hereby guaranteed. as of the date of each shipment or delivery, to be:

l) Not intentionally altered or misbranded within the meaning of the Federal Meat Inspection Act and/or Federal Food, Drug and Cosmetic Act, as amended (if applicable), and not an Article which may not, under the provisions of Section 404, 505 or 512 of such Act be introduced into interstate commerce:

2) Registered, if required. and not intentionally altered or misbranded within the meaning of the terms of the Federal Insecticide, Fungicide or Rodenticide Act, or any other applicable Federal, State or local law and seller has placed Buyer's name on record with the Environmental Protection Agency or similar agency as a registered distributor if such action is required;

3) Not banned or misbranded within the meaning of the terms of the Federal Hazardous Substances Act:

4) Not an article which cannot be legally transported or sold under the provisions of any Federal, State, or local law; and

5) If an article which is or which contains a color additive, such color additive is or will be from a batch certified by the seller. its subsidiaries. if any. or its suppliers, in accordance with the Federal Food, Drug and Cosmetic Act, as amended, and all regulations issued under said Act.

6) Each and every article contained in each shipment or other delivery hereafter made by Seller to the Buyer or to the order of the Buyer is guaranteed to be produced in compliance with the Fair Labor Standards Act of 1 938, as amended, and of the regulations and orders of the administrator of the Wage and Hour Division issued under Section 14 thereof.

This Guarantee shall not render Seller liable for any incidental or consequential damages of whatsoever nature nor shall it extend to the benefit of persons or corporations other than ›rits affiliates.

This is a continuing Guarantee. subject to revocation by Seller upon ten (10) days written notice to Buyer.

By: Patrick Fierro, 09th of January, 2023

Food Safety Quality Assurance Manager

JANUARY 3rd, 2023

BEEF HACCP LETTER OF GUARANTEE

Dear Valued Customer,

Edible beef products from the plants listed at the end of this letter meet all USDA requirements for the production, sale and distribution of meat products.

REGULATORY COMPLIANCE

Tyson Fresh Meats plants listed below are federal establishments and operate under the regulatory requirements set forth in Title 9 of the Code of Federal Regulations.

- Carcasses *E. coli* Biotype I Testing (9CFR§310.25) or alternative methodology per 9CFR§303.1(h)
- HACCP & SSOP (9CFR§416 and 417)
- Salmonella Performance Standard as conducted by USDA-FSIS (9CFR§310.25)
- Documented Annual Reassessment (9CFR§417.4 (a) (3)) effective January of each year. This annual reassessment includes review *E. coli* O157:H7 [EC7] and non-O157 STEC as defined by FSIS Federal Register Notice [Docket No. FSIS -2010-0023].
- Ante-mortem inspection of all cattle intended for slaughter (9 CFR 309).
- Humane handling and slaughter of livestock (9 CFR 313).

HACCP CRITICAL CONTROL POINT (CCP)

Critical Control Points are in place and validated for the control of enteric pathogens (specifically STEC).

- Validated Final Carcass and Offal intended for raw ground use intervention.
- Chilling
- Zero Tolerance for feces, ingesta, and milk (FSIS Directive 6420.2)
- Disposition for STEC positive product.

INTERVENTIONS

Tyson Fresh Meats beef plants employs multiple hurdle interventions to carcasses, primals, and trimmings after the final slaughter CCP intervention for the purpose of reducing microbial contamination that may be present on the surface of the carcass or cuts.

Treatment of carcasses with these validated interventions can result in surface discoloration of exposed lean tissues. Briskets, inside rounds and tenderloins are among the cuts that are most often exposed to these treatments and affected. Occasionally, trimming of the carcass surfaces may result in other discolored subprimal surfaces as the intervention contacts the expose protein and in turn, results in denaturing of the protein tissues. In addition, some offal products such as kidneys will also be affected by the carcass interventions, affecting the typical color of the product.

Tyson Fresh Meats employs a validated multiple hurdle process within the beef slaughter systems to address Enteric Pathogens, specifically *E. coli* O157:H7 and other non-O157 Shiga Toxin producing E. coli [STEC]. These hurdles include:

- Hide-On Treatment – Animal hides may be treated March through October through a pre-harvest intervention and/ or a hide-on wash immediately after exsanguination.
- Steam Vacuums and/ or Trimming – Strategically placed to address pattern opening areas.
- Pre-Evisceration Cabinet System (PECS) – Eligible carcasses are surface treated with an approved processing aid for purpose of reducing microbial contamination.

- Carcass Interventions – After FSIS final inspection, carcasses are treated with one or more pathogen reduction interventions which are demonstrated effective in reducing microbial contamination, which is considered as a Critical Control Point [CCP] of the slaughter system.
- Carcass Spray Chill- Following carcass interventions, carcasses are treated with a processing aid during the spray chill process.
- Offal Intervention – Offal products intended for raw ground beef are treated with one or more processing aids which are demonstrated effective in reducing surface microbial contamination, which is considered as a Critical Control Point [CCP] of the slaughter system.
- Primal & Trim Treatment – Primals and trimmings are treated with an approved processing aid during the carcass disassembly process and prior to packaging.

Under USDA- FSIS rules, 'processing aids' are considered Generally Recognized As Safe [GRAS] by the FDA, and do not have to be included in the products ingredient statement on the label. Processing Aids fall under approvals listed in FSIS Notice 7120.1 (http://www.fsis.usda.gov/Regulations_&_Policies/7000_Series-Processed_Products/index.asp). Additionally, being listed in FSIS Notice 7120.1 means that there is efficacy data submitted to USDA that supports its' use for pathogen reduction when used as described in the approval.

STEC TESTING & ANALYSIS (FOR ALL PRODUCTS INTENDED FOR RAW GROUND USE)

- Sampling: Tyson *E. coli* O157:H7 Sampling Program requires a minimum of 60 pieces per lot collected per the outlined methods [or equivalent] within the August 2014 FSIS *Compliance Guideline for Establishments Sampling Beef Trimmings for Shiga Toxin-Producing Escherichia coli [STEC] Organisms or Virulence Markers*. Tyson Fresh Meats plants employ N60 surface excision or sampling via the IEH N60 Plus™ sampling device or via the MicroTally Cloth.
- Analysis: The entire sample is analyzed via PCR or equivalent laboratory method. Laboratory methods are validated to meet USDA criteria (≥ 98% Sensitivity and ≥ 90% Specificity).
- Verification of STEC lab methods are routinely performed at each Tyson Fresh Meats Laboratory in conjunction with the American Proficiency Institute Microbiological Performance Evaluation Program.
- Tyson Fresh Meats Laboratories have been audited and certified per ISO 17025 standards.
- Combo: Combo lots are tested per customer order with an individualized COA to that specific product.
- Boxed Trim & Offal: All tested trim and offal items are labeled with a product code ending in "T". A labeling information sheet is provided on our website (link at bottom of this letter).
- Ground Beef – All ground beef produced by Tyson Fresh Meats [IBP] is derived from trimmings tested negative for *E. coli* O157:H7 under the Tyson *E. coli* O157:H7 Sampling Program [or equivalent] program. A '*Tested Negative*' statement is printed on the Bill of Lading for each order of ground beef.
- Tyson Fresh Meats utilizes a formal risk assessment program that evaluates specific investigatory findings from the 'on-site' investigation immediately following a High Event Period [HEP].
- STEC Verification Testing is conducted at a minimum of monthly frequency April through September with a quarterly frequency October through March. This verification sampling includes analysis for *E. coli* O157:H7, O26, O45, O103, O111, O121 and O145.
- External sources of raw material must meet or exceed Tyson Foods, Inc. supplier requirements for STEC sampling and analysis.

3rd PARTY AUDIT

Tyson Fresh Meats is audited on an annual basis by an independent 3rd Party standard. This audit encompasses food safety, regulatory compliance, STEC best practices and good manufacturing practices. GFSI Certifications provided for all processing / grinding plants (link at bottom of this letter). GFSI certification is achieved after successfully completing the certification audit and completion of 100% of corrective actions identified by the independent auditor.

Non-O157 STEC System

Producing the safest food possible is Tyson's primary goal. Tyson Fresh Meats [TFM] has reviewed our existing food safety systems, assessed our HACCP programs, and along with published scientific research, we conclude that our existing pathogen reduction technologies and beef slaughter process controls for *E. coli* O157 are effective in providing the same control to non-O157 STEC in beef trimmings and non-intact beef intended for raw use.

- Interventions currently in place for the reduction of Enteric Pathogens, including *E. coli* O157:H7, are effective in addressing non-O157 STEC.
- Research conducted by Tyson Fresh Meats demonstrates that *E.coli O157:H7* is an appropriate 'indicator' organism for non-O157 STEC in beef trimmings, therefore, testing for *E.coli O157* is an effective screening program for non-O157 STEC. From the currently available data we thus conclude that "**a SYSTEM in control for E. coli O157:H7 is a SYSTEM in control for non-O157 STEC**."

Research data will continue to be assessed and scrutinized to ensure that affect non-O157 STEC controls are in place.

Customer Notification

Tyson Fresh Meats plants have a recall plan on file that includes notification to affected customers of any product that may be adulterated or misbranded.

TYSON FRESH MEATS BEEF PLANTS

EST.	Location
Est. 245E	Amarillo, TX
Est. 245C	Dakota City, NE
Est. 245D	Emporia, KS [further processing]
Est. 245J	Joslin, IL

EST.	Location
Est. 278	Holcomb, KS
Est. 245L	Lexington, NE
Est. 9268	Pasco, WA

Send questions or update requests to TFMInquiries@tyson.com

Daniel R. Mallin
Senior Director, FSQA
Tyson Fresh Meats
Dakota Dunes, South Dakota
Please visit our website for all letters of guarantee provided:
https://www.tysonfoods.com/sustainability/food/certifications-and-programs

Processing Aids

Under USDA rule, 'processing aids' are considered GRAS by the FDA, and do not have to be included in the products ingredient statement on the label. Processing Aids fall under approvals listed in FSIS Notice 7120.1 (http://www.fsis.usda.gov/Regulations_&_Policies/7000_Series-Processed_Products/index.asp). Additionally, being listed in FSIS Notice 7120.1 means that there is efficacy data submitted to USDA that supports its' use for pathogen reduction when used as described in the approval.

Q2: What is the definition of a processing aid?

Answer: According to the Food and Drug Administration's (FDA) regulations (21 CFR 101.100 (a) (3) (ii)), the definition of a processing aid is:
a. Substances that are added to a food during the processing of such food but are removed in some manner from the food before it is packaged in its finished form.
b. Substances that are added to a food during processing, are converted into constituents normally present in the food, and do not significantly increase the amount of the constituents naturally found in food.
c. Substances that are added to a food for their technical or functional effect in the processing but are present in the finished food at insignificant levels and do not have any technical or functional effect in that food.