



FOOD SAFETY MANUAL

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Food Safety Manual & FSMS

1. Introduction

This Food Safety Manual describes the Food Safety Management System (FSMS) implemented by OrganicCrops E.I.R.L. The purpose of this manual is to demonstrate OrganicCrops' commitment to food safety, legality, authenticity, and quality across all activities related to sourcing, handling, storage, and export of food products.

2. Scope

This FSMS applies to all OrganicCrops operations involving the sourcing, handling, storage, and export of food products, including cacao products, dehydrated fruits and vegetables, concentrates and extracts, oils, pulps, grains, and seeds. OrganicCrops operates primarily as a trader and exporter and does not conduct primary food manufacturing.

Product scope:

- **CACAO PRODUCTS**
Cacao Beans, Raw Cacao Nibs, Roasted, Cacao Nibs, Cacao Paste, Raw Cacao Paste, Cacao Butter , Deodorized Cacao Butter, Refined Cacao Butter, Cacao Powder 10/12, Cacao Powder 20/22, Cacao Cake, Chocolate Bars, Chocolate Wafers, Chocolate Chips, Chocolate Drops, Chocolate Couverture;
- **DEHYDRATED FRUIT/VEGETABLE PRODUCTS**
Camu Camu Powder, Lucuma Powder, Golden Berries, Maca Powder, Gelatinized Maca Powder, Maca Pieces/Flakes/Chips, Sacha Inchi Powder, Sacha Inchi Seeds, Sacha Inchi Roasted Seeds, Sacha Inchi Salted Seeds, Sacha Inchi Flavoured Seeds, Yacón powder, Yacón Flakes, Yacón Pieces;
- **CONCENTRATE/EXTRACT PRODUCTS**
Maca Extract, Camu Camu Extract, Aguaymanto Syrup/Extract, Yacón Syrup/Extract; Sacha Inchi Oil, Chia Oil;
- **MASHED/PULP PRODUCTS**
Camu Camu Pulp, Lucuma Pulp;
- **GRAIN/SEEDS PRODUCTS**
White Quinoa, Red Quinoa, Black Quinoa, Mixed/Tri-colour Quinoa, Quinoa Flour, Quinoa Pop, Quinoa Extrusion, Black Chia, White Chia, Chia Cake, Amaranth;

3. Organizational Context

OrganicCrops evaluates internal and external factors that may impact food safety, including regulatory requirements, supplier performance, logistics risks, and customer expectations. Interested parties include customers, regulatory authorities, certification bodies, suppliers, and logistics providers.

4. Food Safety Policy and Leadership

Top management demonstrates leadership and commitment to food safety through the implementation and maintenance of this FSMS. Management ensures that food safety objectives are established, communicated, and supported with adequate resources.

5. Regulatory Compliance

OrganicCrops complies with applicable food safety legislation including EU food law, FDA FSMA requirements, UK food regulations, and FSANZ standards for Australia and New Zealand. Customer-specific requirements are reviewed and implemented where applicable.

6. Support and Resources

OrganicCrops ensures that personnel involved in food safety-related activities are competent and adequately trained. Documented procedures are maintained for training, communication, and document control.

7. Operational Control

Food safety risks are controlled through prerequisite programs such as GMP, GHP, pest control, allergen management, supplier approval, and storage and transport controls. Product specifications define intended use and regulatory compliance.

8. Hazard Analysis and Risk Control

Hazard analysis is conducted based on HACCP principles to identify biological, chemical, and physical hazards. Control measures are implemented and verified through supplier controls, specifications, and monitoring activities.

9. Traceability and Recall

OrganicCrops maintains traceability systems allowing product tracking from supplier to customer. Procedures are in place for product withdrawal, recall, incident handling, and regulatory notification.

10. Food Defense and Food Fraud Prevention

Food defense and food fraud vulnerability assessments are conducted to identify risks of intentional contamination or economically motivated adulteration. Mitigation measures are implemented and reviewed periodically.

11. Performance Evaluation

The effectiveness of the FSMS is evaluated through internal audits, performance monitoring, and management review. Findings are used to drive continual improvement.

12. Improvement

Non-conformities are investigated and corrective actions implemented to prevent recurrence. OrganicCrops is committed to continual improvement of its FSMS.

13. Management Approval

This Food Safety Manual is approved by management and reviewed regularly to ensure continued suitability and compliance.

PROCEDURE 1: SUPPLIER APPROVAL, AUDIT & MONITORING

1. Purpose

To ensure that all suppliers of raw materials, finished products, packaging materials, and services consistently meet OrganicCrops' requirements for food safety, quality, legality, traceability, and authenticity, through a structured approval, annual audit, and monitoring process.

2. Scope

Applies to all suppliers involved in the sourcing, processing, packaging, storage, and transport of OrganicCrops products.

3. Responsibilities

Management / Food Safety Responsible Person

- Final supplier approval and risk classification
- Review of annual audit outcomes
- Approval of corrective actions

Procurement / Supplier Management

- Distribution and collection of supplier documentation
- Maintenance of the Approved Supplier List (ASL)

4. Supplier Approval Process

4.1 Initial Supplier Qualification

Prior to approval, suppliers must provide relevant documentation, including where applicable:

- (Technical) Product specifications
- Certificate of Analysis (COA) or equivalent
- Organic certification (EU / NOP / RTPO, where applicable)
- HACCP or food safety system documentation
- Allergen, GMO, Halal, Kosher, and Non-Animal declarations (as applicable)
- MSDS or SDS (as applicable)

Suppliers are assessed based on product risk, process type, and regulatory exposure.

5. Annual Supplier Audit (ASA)

5.1 Audit Requirement

All approved suppliers are subject to an Annual Supplier Audit (ASA) conducted by OrganicCrops using the official Annual Supplier Audit form (Version 25.01): OC_ASA_TPL.DOCX/PDF.

The ASA forms a key part of OrganicCrops' supplier verification and monitoring program.

5.2 Audit Scope

The Annual Supplier Audit evaluates, as applicable:

Internal Audits & Reviews

- Hygiene and GMP
- Sanitation
- Batch identification
- Equipment calibration
- Pest control
- Corrective and preventive action programs
- Traceability systems

Manufacturing Facilities

- Building type and condition
- Maintenance plans (building and equipment)

Environmental Management

- Environmental management system
- Emission control
- Spill prevention and response

Health & Safety

- Documented risk assessments
- Employee and contractor training

Traceability

- Raw material traceability
- Packaging material traceability
- Finished product batch identification

5.3 Audit Execution

- The audit is conducted remotely via documented self-assessment, supported by certification documents and records.
- Where risk level or history requires, the audit may be supplemented by additional documentation review or on-site / third-party audit.
- The completed ASA must be dated, signed, and stamped by an authorized supplier representative.

5.4 Audit Outcomes & Corrective Actions

- Audit results are reviewed by OrganicCrops management.
- Identified non-conformities require documented corrective actions within an agreed timeframe.

Failure to address critical non-conformities may result in:

1. Conditional approval
2. Temporary suspension
3. Removal from the Approved Supplier List

6. Supplier Risk Classification & Monitoring

Suppliers are categorized based on risk:

- **High risk:** Primary processing, direct food contact
- **Medium risk:** Secondary processing, bulk handling
- **Low risk:** Storage, transport, logistics

Monitoring frequency and depth are adjusted accordingly and may include:

- Annual Supplier Audit
- Performance review
- Complaint and incident history
- Certification status changes

7. Approved Supplier List (ASL)

Only suppliers listed on the Approved Supplier List may be used for sourcing.

The ASL is reviewed and updated at least annually or following significant changes.

8. Records

The following records are maintained:

- Approved Supplier List
- Annual Supplier Audit forms
- Supplier certifications and declarations
- Corrective action records
- Supplier correspondence

PROCEDURE 2: TRACEABILITY & PRODUCT RECALL

1. Purpose

To ensure full traceability of products and enable rapid and effective product withdrawal or recall when required to protect consumer safety and regulatory compliance.

2. Scope

Applies to all OrganicCrops products from supplier intake through customer dispatch.

3. Traceability System

3.1 One Step Back – One Step Forward

OrganicCrops maintains traceability that allows:

- Identification of suppliers for each batch
- Identification of customers receiving each batch

Traceability information includes:

- Product name and code
- Batch / lot number
- Quantity
- Supplier details
- Customer details
- Shipment date

3.2 Record Retention

Traceability records are retained for a minimum period in accordance with applicable regulatory requirements and customer contracts.

4. Product Withdrawal & Recall

4.1 Recall Triggers

A recall may be initiated due to:

- Food safety risk
- Regulatory non-compliance
- Customer complaint

- Supplier notification

4.2 Recall Team

A recall team is appointed and includes:

- Management
- Quality / Food Safety Representative
- Sales / Customer Communication

4.3 Recall Execution

In the event of a recall:

1. Affected batches are identified
2. Customers and authorities are notified where required
3. Product is withdrawn from the supply chain
4. Effectiveness of recall is verified

4.4 Recall Testing

Mock recalls are conducted periodically to verify system effectiveness.

5. Records

- Traceability logs
- Recall reports
- Customer notifications
- Mock recall results

PROCEDURE 3: FOOD FRAUD & FOOD DEFENCE

1. Purpose

To prevent intentional contamination, adulteration, substitution, or economically motivated fraud that could compromise food safety, legality, or authenticity.

2. Scope

Applies to all products, suppliers, and logistics activities under OrganicCrops' control.

3. FOOD FRAUD (VACCP)

3.1 Risk Assessment

Food fraud vulnerability assessments consider:

- Product value and demand
- Historical fraud incidents
- Supply chain complexity
- Country of origin risks

3.2 Mitigation Measures

Controls may include:

- Supplier approval and verification
- COA and specification review
- Origin verification
- Market intelligence monitoring

3.3 Review

Food fraud risks are reviewed annually or upon significant change.

4. FOOD DEFENSE (TACCP)

4.1 Threat Assessment

Food defence assessments evaluate:

- Unauthorized access risks

- Storage and transport security
- Vulnerable points in the supply chain

4.2 Mitigation Measures

Controls include:

- Restricted access to storage areas
- Secure transport arrangements
- Personnel awareness and reporting

4.3 Incident Management

Any suspected intentional contamination is reported immediately to management and handled according to incident procedures.

5. Records

- Food fraud vulnerability assessment
- Food defence risk assessment
- Corrective actions

HACCP HAZARD ANALYSIS – PRODUCT GROUPS

1. CACAO PRODUCTS

Beans, nibs, paste, butter, powders, chocolate derivatives

| Hazard Type | Potential Hazard | Source | Control Measures | Type |
|-------------|-------------------------|-------------------------|--|------|
| Biological | Salmonella | Raw cacao beans | Approved suppliers, COA, GMP, roasting controls (supplier) | PRP |
| Biological | Moulds / Mycotoxins | Poor drying/storage | Supplier audits, moisture specs, storage controls | PRP |
| Chemical | Pesticide residues | Agricultural practices | Organic certification, supplier documentation, testing | PRP |
| Chemical | Heavy metals (Cd, Pb) | Soil contamination | Origin control, COA, regulatory compliance | PRP |
| Physical | Stones, shell fragments | Harvesting / processing | Supplier sieving, visual inspection | PRP |

Conclusion: Hazards controlled through supplier approval, specifications, and PRPs. No CCPs identified at OrganicCrops level.

2. DEHYDRATED FRUIT & VEGETABLE PRODUCTS

Maca, lucuma, camu camu, yacón, sacha inchi, golden berries

| Hazard Type | Potential Hazard | Source | Control Measures | Type |
|-------------|-------------------------|------------------------|------------------------------------|------|
| Biological | Pathogenic bacteria | Drying environment | GMP, sanitation, COA | PRP |
| Biological | Yeasts & moulds | Inadequate dehydration | Moisture limits, supplier audits | PRP |
| Chemical | Pesticide residues | Cultivation | Organic controls, supplier testing | PRP |
| Chemical | Processing contaminants | Drying equipment | Supplier GMP, maintenance | PRP |
| Physical | Foreign matter | Drying / handling | Sorting, visual inspection | PRP |

Conclusion: Risks managed through dehydration controls, moisture specifications, and supplier verification.

3. CONCENTRATES, EXTRACTS & OILS

Maca extract, yacón syrup, chia oil, sachá inchi oil

| Hazard Type | Potential Hazard | Source | Control Measures | Type |
|-------------|--------------------|-----------------|-----------------------------------|------|
| Biological | Microbial growth | Syrups/extracts | Brix/pH control, GMP | PRP |
| Chemical | Solvent residues | Extraction | ETO-free declaration, specs | PRP |
| Chemical | Oxidation products | Oil processing | Peroxide limits, storage controls | PRP |
| Physical | Metal fragments | Equipment | Filtration, supplier controls | PRP |

Conclusion: Controlled through formulation specs, process validation, and supplier audits.

4. MASHED / PULP PRODUCTS

Camu camu pulp, lucuma pulp

| Hazard Type | Potential Hazard | Source | Control Measures | Type |
|-------------|-------------------|-----------------------|------------------------------|------|
| Biological | Pathogens | High moisture content | Frozen storage, GMP, COA | PRP |
| Chemical | Cleaning residues | Processing | Supplier sanitation programs | PRP |
| Physical | Foreign matter | Processing equipment | Filtration, visual checks | PRP |

Conclusion: Cold chain control and hygiene PRPs are critical.

5. GRAIN & SEED PRODUCTS

Quinoa, chia, amaranth, processed forms & formats

| Hazard Type | Potential Hazard | Source | Control Measures | Type |
|-------------|------------------|--------------------|----------------------------|------|
| Biological | Salmonella | Raw grains/seeds | Supplier HACCP, COA | PRP |
| Chemical | Pesticides | Cultivation | Organic controls, testing | PRP |
| Chemical | Mycotoxins | Storage conditions | Moisture limits, audits | PRP |
| Physical | Stones, glass | Harvesting | Cleaning, sorting, sieving | PRP |

Conclusion: Supplier-managed processing with verification through documentation.

HACCP Conclusion

No Critical Control Points (CCPs) are identified at the OrganicCrops operational level.

Food safety hazards are effectively managed through:

- Supplier approval & annual audits
- Product specifications and COAs
- PRPs (GMP, GHP, traceability, storage, transport)
- Food fraud and food defence controls

This HACCP analysis is reviewed annually or upon significant change in product, supplier, or regulatory requirements.

ANNEX 1 - MOCK RECALL & PRODUCT WITHDRAWAL TEST

Company: OrganicCrops E.I.R.L.

Test Type: Mock Recall Actual Recall

Date of Test: _____

Conducted by: _____

Product Details

Product name: _____

Product group: _____

Batch / Lot nr(s): _____

Quantity affected: _____

Producer: _____

Recall Trigger (Simulation)

Supplier notification

Customer complaint

Regulatory concern

Food safety hazard identified

Other:

Traceability Verification

| Traceability Element | Result | Comments |
|----------------------------------|--|----------|
| Supplier identified | <input type="checkbox"/> Yes <input type="checkbox"/> No | _____ |
| Incoming batch records available | <input type="checkbox"/> Yes <input type="checkbox"/> No | _____ |
| Customers identified | <input type="checkbox"/> Yes <input type="checkbox"/> No | _____ |
| Dispatch records available | <input type="checkbox"/> Yes <input type="checkbox"/> No | _____ |

Recall Execution

Time to identify affected batch(es): _____

Time to identify all customers: _____

Were all affected customers notified? Yes No

Were authorities notified (if applicable)? Yes No

Effectiveness Check

100% of affected product accounted for

Traceability system effective

Improvements required

Comments / Findings:

Conclusion

Recall system effective

Improvements required

Management Sign-off

Company dept: _____

Name: _____

Function: _____

Signature:

ANNEX 2: SUPPLIER RISK SCORING MATRIX

This matrix is used together with the Annual Supplier Audit form to classify suppliers and define monitoring frequency.

SUPPLIER RISK ASSESSMENT

Company name: _____

Product(s): _____

ASA Ref / Year: _____

Risk Criteria & Scoring

| Criteria | Low Risk (1) | Medium Risk (2) | High Risk (3) | Score |
|--------------------|----------------|-----------------|--------------------------|-------|
| Product Type | Low-risk dry | Semi-processed | High-risk / ready-to-use | |
| Processing Level | Minimal | Moderate | Complex | |
| Country of Origin | Low reg. risk | Medium risk | High risk | |
| ASA Result | No NCs | Minor NCs | Major NCs | |
| Certif. Status | GFSI / Organic | Partial | None | |
| History/Complaints | None | Occasional | Repeated | |
| TOTAL SCORE | | | | |

Risk Classification: **Low Risk:** 6–8 / **Medium Risk:** 9–12 / **High Risk:** 13–18

Monitoring Requirements

| Risk Level | Monitoring Frequency |
|---------------|--|
| Low | ASA every 12 months |
| Medium | ASA + document review |
| High | ASA + corrective actions + enhanced monitoring |

ANNEX 3 - HACCP REVIEW & APPROVAL SIGNATURE PAGE

HACCP REVIEW & APPROVAL

Company: OrganicCrops E.I.R.L.

HACCP System Applies To: All product groups listed in scope

HACCP Methodology: Codex Alimentarius / ISO 22000 principles

Next review date:

Review Summary

- Hazard analysis completed per product group
- Biological, chemical, and physical hazards identified
- Control measures defined via PRPs and supplier controls
- No CCPs identified at OrganicCrops operational level
- HACCP system reviewed for adequacy and effectiveness

Trigger for Review

- Annual review
- New product
- New supplier
- Regulatory change
- Incident / complaint

Approval

| Name | Function | Signature | Date |
|------|---------------------------|-----------|------|
| | Management Representative | | |
| | Food Safety Responsible | | |