



January 22, 2020

Customer Questionnaire Response

Dear Valued Tree Top, Inc. Customer,

Tree Top, Inc. ® is a Pacific Northwest cooperative that has been delivering fruit products and ingredients that reflect the company's passion, attention to quality and craftsmanship since 1960. Located in Selah, in the heart of Washington's apple country, Tree Top, Inc. is a global business owned by U.S. growers firmly rooted in the agricultural co-op's small-town heritage and rural values. Nearly 1,000 grower-owners deliver their fruit from nearby orchards and fields to the cooperative's facilities. In turn, their cooperative produces and sells products including top-quality juices, sauces and premium ingredients. Tree Top, Inc. and its growers are committed to growing, producing and innovating world-class fruit products. Our products and expertise, people and practices are the qualities that take us beyond the ordinary...beyond good.

We have received your request and understand the importance of our customers' questionnaires. Due to the large volume of requests we receive, we are unfortunately unable to complete customers' unique questionnaires. As a result, we have created the attached summary package as a substitute to address the most frequently asked questions and provide relevant information to our valued customers. In addition, we are often asked to generate separate signed statements of compliance to a variety of potential issues. In an effort to eliminate the multiple signed statements, we are affirming to the content contained herein as being accurate to the best of our knowledge as per the date of this publication.

Sincerely,

Ken Janes

Vice President Quality & Technical Services

Tree Top, Inc.



Confidentiality Notice: The information contained in this email and any accompanying attachment(s) are intended only for the use of the intended recipient and may be confidential and/or privileged. If any reader of this communication is not the intended recipient, unauthorized use, disclosure or copying is strictly prohibited, and may be unlawful. If you have received this communication in error, please immediately notify the sender by return email, and delete the original message and all copies from your system. Thank you.

Table of Contents

Customer Questionnaire Response	1
Legal Company Name: Tree Top, Inc.	4
Tree Top, Inc. Mission and Values	4
Sustainability/Corporate Responsibility	4
Employee Welfare	4
Ethics and Code of Conduct.....	5
Crisis/Disaster Program	5
Quality Management.....	5
Regulatory Compliance.....	5
Current Good Manufacturing Practices	6
Pest Control	6
Training.....	6
Sanitation.....	6
Preventative Maintenance	6
Water.....	6
Environmental Monitoring Program.....	7
Sample Retain Program	7
SQF Program	7
Food Safety / HACCP.....	7
Supplier Management	8
Food Defense.....	8
Shipping and Receiving Requirements	9
FDA Registration	9
Change Management	10
Foreign Material	10
Complaints.....	10
Recall & Trace	10
Product Lot Coding	11
Rework vs. Reprocess	12
Hold for Non-Conforming Product	12
Allergens	12
Kosher.....	13
Organic	13
Halal.....	13
Gluten	13
Genetically Modified Organisms.....	13

Irradiation14

Sewage/Sludge14

Vegan/BSE Status14

Safety Data Sheets14

California Proposition 6514

California Transparency in Supply Chains Act of 2010.....14

Antibiotic Statement..... 14

C-TPAT Statement.....14

DEHP Statement15

Diacetyl15

Fumigation.....15

Gelatin Statement15

Melamine Statement.....15

Nanotechnology15

PHO Statement15

Radiological Hazards.....15

Natural Statement16

Patulin.....16

Pesticide Program.....16

Heavy Metals16

Laboratory Testing.....17

Food Grade Statement17

Food Contact Packaging17

Letter of Guarantee/Certificate of Insurance17

Facility Information18

Tree Top, Inc. Selah Plant18

Tree Top, Inc. Prosser Plant18

Tree Top, Inc. Ross.....19

Tree Top, Inc. Wenatchee.....19

Tree Top, Inc. Medford19

Tree Top, Inc. Oxnard20

Tree Top, Inc. Woodburn.....20

Index21

Legal Company Name: Tree Top, Inc.
Corporate Mailing Address: PO Box 248, Selah, WA 98942
Corporate Phone: 509-697-7251
Corporate Fax: 509-697-1474
Remittance Address: Tree Top, Inc.
6115 Paysphere Circle
Chicago, IL 60674
Email: remittance@treetop.com
Duns#: 009-26-8319
Fed Tax ID#: 91-0720280

Tree Top, Inc. Mission and Values

Tree Top, Inc. mission is to deliver sustainable value to our Grower-Owners by exceeding customer expectations. We uphold our corporate values and strive to achieve our cooperative's vision to be your first-choice fruit company. Corporate Values (Empowerment, Integrity, Quality, Respect, Responsibility and Unity).

Sustainability/Corporate Responsibility

Tree Top, Inc. has an active Corporate Social Responsibility program with established goals and areas of focus and is committed to transparency and improvement. A full annual report reflecting our sustainability index and a report of our employee welfare and corporate giving is published to our website.

The company is a Sedex B member #ZC1058180 and post results of Ethical Audits, including its SMETA Pillars IV audits to site for supply chain risk management and transparency.

Tree Top, Inc. also participates in the Carbon Disclosure Project (CDP) to report its CO2 emissions and to receive additional support and recommendations for improvement.

Tree Top does not have certified environmental management program at this time.

The core principles behind our practices are to:

- Minimize harm
- Maximize benefit
- Be accountable & responsive to key stakeholders
- Support strong financial results

The following are our primary focus areas:

- Manufacturing Plant Energy Use
- Water Use and Waste Water
- Emissions/Air
- Packaging
- Employee Welfare
- Community Support & Volunteerism

Employee Welfare

We build strong relationships with growers, employees, customers and business partners – based on mutual respect and support, valuing each other's experience, options and diversity.

Tree Top, Inc. is an Equal Opportunity / Affirmative Action Employer (EEO) providing gainful employment in a wide range of fields. We participate in an annual audit and complete an Affirmative Action Plan in compliance with the Office of Federal Contract Compliance Programs (OFCCP) and the Department of Labor. Tree Top, Inc. requires all vendors and suppliers to comply with applicable affirmative action, and labor laws and regulations.

Tree Top, Inc. strives to provide a safe work environment for all employees. Each facility has an established safety committee that meets on a regular basis. Employees are provided personal protective equipment as needed to perform safe job function and maintain GMP compliance. Examples include: gloves, bump caps, hairnets, hearing and eye protection, etc.

Ethics and Code of Conduct

Tree Top, Inc. has a formal Code of Conduct using international standards similar to those held by many major international manufacturing companies. Voluntary third-party Ethics Audits were undertaken beginning in 2013 at each of our manufacturing facilities. Audits compare labor practices, environment, health and safety and code of conduct against the United Nation's Ethical Trading Initiative Standards. SMTEA Pillars IV and other related audits are posted to the Sedex site for customer review.

Crisis/Disaster Program

Tree Top, Inc. has an Emergency Preparedness and Business Continuity Plan to assess 20st Century threat and to respond accordingly using the Preparis crisis management system. Specific procedures and business continuity plans are also addressed in our Pandemic Continuity of Operations Plan, Major Facility Disaster Plan and Administrative Disaster Recovery Plan, including Cybersecurity. These include procedures to follow in case of unexpected crisis events to minimize disruption and resume normal operations as quickly and safely as possible.

Quality Management

Tree Top, Inc. is committed to continuously meeting customer specifications and regulatory requirements, providing safe and high-quality products. Tree Top, Inc. achieves this by establishing, monitoring and regularly reviewing food safety and quality objectives and goals, implementing continuous improvement, HACCP, GMP, and relevant process control management programs.

The policies and procedures contained in the Tree Top, Inc. Quality Systems are intended to assure that the products and services we produce meet regulatory requirements and our customer's needs. Management is committed to providing the human and financial resources necessary to achieve and maintain certifications and is committed to annual review of the entire SQF (Safe Quality Food) program.

Tree Top, Inc. has a Corporate Quality department and each facility has a Quality Manager and team on site. Quality Policies, Methods and Procedures are documented and stored electronically. These are reviewed annually and updated as needed.

Tree Top, Inc. management are members of various trade organizations including: Northwest Food Processors Association, Grocery Manufacturers Association, Juice Products Association, Apple Processors Association, US Apple Association, National Council of Farmer Cooperatives, Washington State Council Farmers Coop, International Dairy Foods Association, Washington State Horticulture Association, IFT, SHRM, AOAC International, National Environmental Health Association, International Association for Food Protection.

Regulatory Compliance

We have implemented and comply with all required aspects of the Food Safety Modernization Act, per the U.S. Code of Federal Regulations, Title 21, Part, 117. For all products we supply not covered under the Juice HACCP rule (Title 21, Part 120), we performed the required hazard analysis, identified potential hazards and generated food safety plans to comply with Subpart C – Hazard Analysis and Risk-Based Preventive Controls. Throughout the organization we have several quality and operations personnel that are PCQI certified per FDA training

requirements which ensures that we have at least one PCQI certified individual per location. Each facility has an effective, written policy detailing the procedures and responsible persons associated with regulatory contact and facility inspection.

Current Good Manufacturing Practices

Facility specific Good Manufacturing Practices (GMPs) outline the requirements for the production of safe foods and are required of all employees and visitors. This program controls Personnel (disease control, cleanliness, jewelry, personal item storage, food and beverage consumption, smoking and visitor control), Plant and Grounds, (grounds, plant construction and design, lighting and ventilation), Sanitary operation (cleaning compounds, pest control, sanitation of food contact surfaces), Sanitary facilities and controls, Equipment and utensils, Procedures and controls, Warehousing and distribution, Holding and distribution of human food by-products for use as animal food, and Defect Action Levels. Inspections and audits occur with regular frequency and timely correction of findings. The Tree Top, Inc. Good Manufacturing Practices program has been modeled after the FDA CGMP guidelines.

Pest Control

A Pest Control Program is in place to exclude and control conditions that encourages pest activity from all Tree Top, Inc. production areas, product and packaging storage facilities, and the premises of each plant. Pests include, but are not limited to dogs, cats, birds, rodents and insects. An updated map showing the location of all devices, both internal and external, is available for each facility. All Tree Top, Inc. facilities utilize licensed contracted pest control operators on a weekly inspection basis. The PCO is responsible for providing a report of all activity to Tree Top, Inc. management for review and trending analysis. No pesticides are stored on site.

Training

Tree Top, Inc. employees have annual scheduled training via a computer-based training system, classroom workshops, or individualized instruction. Formal training includes, GMP, HACCP, Allergens, food defense, and safety.

Sanitation

A written Master Sanitation schedule for periodic cleaning of the facility is implemented and documented. This includes detailed instructions for frequency, method and responsibility. Effectiveness of cleaning SSOP's is validated using visual, analytical and microbiological checks. The cleanliness of the equipment is checked using ATP swabs after cleaning to verify sanitation. The facility Quality Manager oversees the sanitation program. Cleaning records are maintained both in electronic and paper formats.

Preventative Maintenance

Maintain and repair the plant, equipment and building in a manner that minimizes the risk of product, packaging or equipment contamination. Continual maintenance on all areas of the facility must be maintained and scheduled properly to allow for preventative maintenance. This is accomplished through work orders, PM check sheets, and the work list.

Water

Water is tested for physical, chemical, microbiological contaminants on an annual, semiannual basis.

Environmental Monitoring Program

An Environmental Monitoring Program is in place to monitor the facilities environment for microbial risks. Monitoring of both processing and non-processing areas is conducted at minimum monthly using scientifically acceptable methods. The monitoring plan includes target organisms, a zoned approach, swabbing sites, action levels, and corrective action responses. The controls for *Salmonella* and *Listeria* spp. will be product, process and facility specific. Samples are taken during normal times of operation to assure results represent environmental conditions throughout the operation cycle. Air quality sampling is conducted twice per year, with sampling locations and documentation of results for historical records/trend analysis.

Sample Retain Program

Tree Top, Inc. facilities have developed a “written sample retain procedure” following the guidelines of our Retention program containing representative samples of all products produced within each plant to include retail, industrial, co-pack, contract, and private label products. All retain samples are to be removed from storage within “one month” of the end of the intended shelf-life period date.

SQF Program

The SQF Program is a leading, global food safety and quality certification program and management system designed to meet the needs of buyers and suppliers worldwide. It provides independent verification that a supplier’s food safety and quality management system complies with international and domestic food safety regulations.

<i>Facility</i>	<i>Audit Date</i>	<i>Date of Expiry</i>	<i>Certificate#</i>	<i>Rating/Score</i>
Medford	2/26/19	6/3/2020	9911	Excellent/99
Oxnard	6/4/2019	7/28/2020	9905	Good/96
Woodburn	7/2/2019	9/10/2020	9909	Good/95
Selah	6/4/2019	9/10/2020	9906	Excellent/97
Ross Plant	11/18/2019	2/12/2021	9912	Good/95
Wenatchee	11/14/2019	2/26/2021	9910	Excellent/99
Prosser	11/20/2019	2/25/2021	9907	Excellent/97

If you require the audit in its entirety, please email customerservice@treetop.com

Food Safety / HACCP

In accordance with the regulation promulgated under the United States Federal Food, Drug and Cosmetic Act and the U.S. Code of Federal Regulations, Title 21, Part 120 regarding Hazard Analysis and Critical Control Point Systems: Tree Top, Inc., certifies that all purees, puree concentrates, juice, juice concentrates sold and delivered into commerce comply with Hazard Analysis and Critical Control Point (HACCP) Systems and Procedures for Safe and Sanitary Processing and Importing of these products as stated in 21 CFR 120. In accordance with Part 117 regarding Preventative Controls: Tree Top, Inc., certifies that all products not covered by juice HACCP, have the appropriate food safety plans and preventative controls in place.

All Tree Top, Inc. facilities have established HACCP plans, flow charts and pre-requisite programs to meet FDA requirements. A dedicated HACCP team has been created for each facility and all programs are reviewed at least annually. The Food Safety Plan includes Critical Control Points (CCPs), which are identified by hazard analysis, with controls that are based on scientific evidence to effectively eliminate or reduce the hazard. Records of training,

monitoring, annual verification activities and non-conformances are maintained for CCPs, Control Points (CPs) and pre-requisite monitoring programs. The HACCP plans have not been independently certified but are reviewed as part of the SQF Audit process/reviewed by the HACCP Team members on an annual basis. Internal FSSA (Food Safety, Sanitation Audit) / GMPI (Good Manufacturing Practices Inspection) audits are completed monthly at each facility. Corporate Quality Assurance will also audit the progress and improvement in maintaining Good Manufacturing Practices and sanitation at each facility once per year or as needed by risk assessment. In addition, Tree Top, Inc. provides fruit ingredients to several of the world's top food/beverage companies who generally audit our facilities annually. These partners continually seek improvement, which help us to become the world class fruit ingredient supplier you can trust and rely on.

Tree Top, Inc. has numerous processes. If you require a copy of a HACCP Program for a specific product, please email customerservice@treetop.com.

Supplier Management

A Supplier Approval program is used to approve and monitor suppliers. Tree Top, Inc. has a supplier verification policy to verify that each of our suppliers and/or manufacturers meet regulatory food safety requirements and Tree Top, Inc. expectations. This policy includes suppliers of raw fruit, ingredients, packaging supplies, chemicals, cleaning supplies, inks, paints, solvents, lubricants, etc. used in any Tree Top, Inc. or Tree Top, Inc. Contract Manufacturing facility. Only approved products from approved suppliers shall be used.

Tree Top, Inc. has a Supplier Quality Partnership Analysis policy to provide a consistent, thorough way to verify the supplier compliance to regulatory and Tree Top, Inc. requirements. Key elements of this policy include a risk assessment of suppliers and on-site Supplier Partnership Analysis. The frequency of an analysis will be determined based on the risk of the supplier.

Food Defense

Tree Top, Inc.'s Food Security Program outlines the key security elements we have put in place over the past several years. We are fully aware of the Public Health Security and Bioterrorism Preparedness and Response Act of 2002 (The Bioterrorism Act), especially items under Section 305 and 306 that require the FDA to develop regulations to better protect the U.S. food supply from, and enable effective reaction, to terrorist attacks.

Tree Top, Inc. prides itself on providing high quality, safe products to our customers and has comprehensive Quality and Food Safety policies and programs in place.

Tree Top, Inc. considers the following elements:

- Risk Assessment Teams
- Identified threats and risks
- Process flow diagrams for each type of process used to product food and food ingredients
- Control measures to reduce or eliminate the threat or risk
- Controlled processes related to employee hiring, visitor/contractor management, mail handling, water and air handling
- Routine Security Assessment Audits
- Follow up after Security Audits
- Facility Access Control
- Intentional Adulteration

As part of our audits, performed at least annually, the physical security of our facility is reviewed, as are our warehouse locations and co-packers. All employees are allowed access to the facility with the use of magnetic photo ID key cards with restricted security clearance as needed. All Tree Top, Inc. facilities are accessed via self-

closing/locking doors. Key card access is disabled upon termination of employment. All new employees undergo a background check prior to hiring.

In addition, third parties are not given access to our plants unless a Tree Top, Inc. employee escorts them. Tree Top, Inc. policy requires that incoming ingredients and materials have identifiable tamper evident seals, including bulk and truckload shipments.

Tree Top, Inc. has also met the registration requirements of the act by registering all of its' manufacturing facilities with the FDA. Internal processes have been put into place to assess supplier compliance. Tree Top, Inc. has a complete lot-tracing program and maintains records as required under section 306 of the Bioterrorism Act.

Shipping and Receiving Requirements

Tree Top, Inc. has a policy in place to inspect and document incoming and out-going products, ingredients, packaging materials, containers and trailers to assure no contamination has occurred. Vehicles shall be inspected prior to loading/upon receipt for cleanliness and suitability. Information should be available documenting the nature of the last three shipments for bulk juice/concentrate trailers.

Food products shall not be shipped in mixed loads with other non-food materials where contamination of the food products may occur due to foreign substances, toxic materials, off-odors or other conditions which may render the food ingredient unacceptable.

If the product(s) must be protected from freezing or excessive heat, as specified in the Tree Top, Inc. Ingredient Specification, such protection shall be provided at the time of loading, and during transit. The communication requirements to the carrier are the responsibility of the product supplier.

All Truck Load trailers shall be sealed, and the seal numbers recorded on the Bill of Lading by Tree Top, Inc. personnel. For LTL Loads, Tree Top, Inc.'s requires that all LTL drivers have a padlock, which they are responsible for, to secure the doors of the trailer between pick-ups and deliveries. Once products/ingredients are loaded onto the vehicle, the safety and security of the load is the driver's responsibility.

FDA Registration

All Tree Top, Inc. facilities are individually registered, and current with the biennial registration requirements. In the Bioterrorism Act, Congress directed the FDA to keep registration information confidential for security reasons. At Tree Top, Inc. we respect that decision and in the spirit of cooperation with government efforts to assure the safety of the food supply, we have determined that we must keep our facility registration information confidential. Therefore, we will not ask for your registration information either. Tree Top, Inc. has also confirmed that all of our suppliers, where applicable, have complied with the registration requirements as outlined.

Products produced in Tree Top, Inc. facilities shall be produced under regulatory guidance of the US Food and Drug Administration as well as the state regulatory agencies where the individual facilities are located (Washington, Oregon and California). Government agencies perform routine audits of our facilities. Tree Top, Inc. has not been issued any FDA 483 forms at any facility within the past three years.

Change Management

A formal change control procedure is necessary to ensure commercialized products are manufactured, handled, and distributed using controlled processes, which are intended to generate product that consistently meets customer expectations. An overriding corporate policy is in place to assure all of these changes are properly documented with corporate level approval required for significant process changes. A cross-functional team, called a Change Committee, meets on a regular basis to review all proposed changes and assess the impact to the facility, process, products, or safety. This committee shall be defined by each facility. Example of committee: Plant Manager, QA Manager, Maintenance Manager, Safety Designee. Customers may be notified of significant changes affecting the manufacture of their products.

Foreign Material

Foreign material control starts with the Raw Fruit Supply. All raw fruit, regardless of type or variety, received at Tree Top, Inc. processing facilities needs to be “clean” as defined by the USDA under United States Standards for Grades of Apples: 51.314. Magnets, Metal Detectors and or Screens are used on the individual product lines (depending on product type/facility) for the prevention of foreign material in finished product. The risk of chemical or physical contamination of product is managed through facility and procedures. Foreign body contamination risk is identified by hazard analysis and controlled with appropriate equipment. HACCP, Glass Control /Brittle Plastic, Wood, Chemicals, Food-grade lubricants and Non-Food-grade lubricants are addressed and controlled by procedure and facility. Metal Control Policies are in place at each of our facilities, HACCP Foreign Materials Metal Detection Policy. The Hazard Analysis Critical Control Point (HACCP) system is a management system focused on prevention of problems in order to assure the production of food products that are safe to consume. By using appropriate devices, automatic metal detectors, or rare earth magnets alone or in combination, the processing facilities will be able to prevent, identify, and eliminate the source of metal fragments.

Complaints

A Customer and Consumer Complaint Policy is in place to provide prompt and effective action and complaint resolution when dealing with customer and consumer complaints. This procedure is designed to identify the special causes of variation and to develop corrective actions to eliminate them in order to improve the production process. The complaints are documented in a central database. The complaint and sample (if available) are sent to the producing plant QA Manager or department representative for investigation and corrective action report. Once complete, within 5 business days, a notification with all complaint details and a link back to the original complaint will be sent to the Notification Group, Sales Manager, Customer Service Rep., and Department Representative, for the complaint.

Recall & Trace

Tree Top, Inc. has a recall policy in place and a Crisis Management Plan which includes the Emergency Contact List, Legal Contacts, Flow Chart, and assigned responsibilities in the event of a recall.

The scope of our recall policy includes all items produced or packed by Tree Top, Inc. Data on all ingredients, raw materials, food contact packaging, supplies, intermediate products, and finished products associated with the recall must be collected and documented at a minimum of 100%. The trace and collection of all documentation related to the trace must be completed in a maximum of four hours, with a target of a maximum of two hours.

Mock recalls or product trace are performed at the facilities at least annually to monitor the effectiveness of our ability to trace product should a recall ever become necessary. All ingredients and finished products are given a unique lot number for traceability in our system. This allows us to trace our product from the receiving of the fruit

and other ingredients to the product produced and shipped to the customer.

Recall Coordinator:

Ken Janes

VP, QA & Technical Services

Phone: 509-698-1664

Fax: 509-698-1446

ken.janes@treetop.com

Recall Alternate:

Cliff SeaCrest

Director, Quality and Food Safety

Phone: 509-698-1283

Fax: 509-698-1446

cliff.seacrest@treetop.com

For after hour emergency contacts, please contact your broker or salesperson.

Product Lot Coding

Tree Top, Inc. product lot codes use a Julian date-based system. Generally, the product lot code will consist of the 2-digit year, 3-digit Julian date followed by a 2-digit plant code, 2-digit line code or item type number and the final 2 to 3 digits (depending on the product type) will indicate the batch or pallet number.

Selah and Prosser Facilities – Retail Products

ALL TREE TOP, INC. CPG product shall be assigned a seven (7) digit F-Code Lot Number (sequential number used for identification); additionally, an eleven (11) digit Production Code in Lot Ref 2 in Movex is assigned according to the following scheme:

1st- 2nd DIGIT: Last 2 digits of the producing or receiving year

3rd- 5th DIGITS: Julian Date

6th – 7th DIGITS: Plant code

8th – 9th DIGITS: Line Number

10th – 11th DIGITS: Consecutive batch number or receiving number

Wenatchee and Ross Facilities – Dried Products

ALL ROSS AND WENATCHEE EVAPORATED FRUIT finished goods containers shall be assigned a twelve (12) digit lot number according to the following scheme.

1st- 2nd DIGIT: Last 2 digits of the producing or receiving year

3rd- 5th DIGITS: Julian Date

6th – 7th DIGITS: Plant code

8th – 9th DIGITS: Item Type or Line Number

10th – 12th DIGITS: Consecutive pallet number (01-999)

Medford, Oxnard, Woodburn – Purees and Fruit Preps/ Bases at Southern Facilities

ALL SOUTHERN FACILITY PRODUCTS shall be assigned an eleven (11) digit lot number if produced in Woodburn or Oxnard and a (12) Twelve-digit lot number for those products produced at the facility located in Medford, OR, according to the following scheme:

1st- 2nd DIGIT: Last 2 digits of the producing or receiving year

3rd- 5th DIGITS: Julian Date

6th – 7th DIGITS: Plant code

8th – 9th DIGITS: Item Type or Line Number (Medford: Line/Filler#)

Oxnard and Woodburn locations:

10th – 12th DIGITS: Consecutive pallet number per item, per 24-hour period

Medford location:

10th DIGIT: Sequence number

11th – 12th DIGITS: Internal code, default digits will be 00

Rework vs. Reprocess

Rework is considered product that is brought in from inventory or reworked during a week other than original production week and is blended back, re-inspected, sorted, sieved, dried, etc. Any rework utilized is tracked with the original lot number for usage. Color coded tags are used to identify rework products with allergenic ingredients and is done with same formulation items only (like into like).

The definitions of rework and reprocess are often used interchangeably by different organizations. Tree Top primarily uses only the rework term throughout our manufacturing locations. Product is allowed to be reworked back into the process for various failed product quality attributes during the same production date, following all appropriate steps to ensure complete traceability. Due to adding the product into a current production stream, needed to be reworked at a later date, defined guidelines are available per the reason for failure. Following all appropriate steps to ensure complete traceability is also a requirement in these circumstances. Rework of product due to failing a food safety measure are never allowed.

Hold for Non-Conforming Product

Tree Top, Inc. has an established Hold for Non-Conforming Product Policy. This policy addresses all holding and releasing practices for non-conforming products, ingredients, processing aides, containers/packaging associated with Ingredients and Consumer Package Goods produced at Tree Top, Inc. or its affiliates. All items are tagged and system to prevent accidental shipping. Final disposition is assigned by the QA/Technical Services or designee as directed by Corporate QA. . Tree Top, Inc. maintains a positive release program for finished goods to ensure products comply with all applicable specifications and attributes. In the event a product fails to meet quality standards, the product is unable to be released for shipment without written customer authorization. Tree Top, Inc. maintains a positive release program for finished goods to ensure products comply with all applicable specifications and attributes.

Allergens

A Food Safety Allergen Control Policy is in place for all the 'Big 8' allergens and their derivatives. Two "sensitizing" agents are also included within the scope of the allergen control program: Sulfite and FD&C Yellow #5 (tartrazine). Tree Top, Inc. has policies in place for allergen sensitive ingredient controls. An ingredient Hazard Analysis has been conducted for all plant ingredients, process aids, flavors, acidulants, enzymes, food grade lubricants, and food contact antimicrobial agents. Some Tree Top, Inc. facilities may utilize the following allergens: Soy (soy lecithin), Tree nuts (Coconut, Lychee nut), Wheat (Modified Wheat Starch), Milk (Whey, Yogurt). All ingredients and finished products are prominently labeled and allergen containing products are stored in segregated areas to avoid any cross contamination.

Each manufacturing facility follows Good Manufacturing Practices (GMPs) and follows allergen control strategies to minimize the potential cross contact of food allergens, including but not limited to HACCP, training, separation of like materials, and sanitation. Standard operating procedures are in place to prevent the cross contamination of non-allergenic products. Each facility has an allergen team with representatives from all appropriate departments. Allergen Control Plan is reviewed annually and updated when necessary – especially when new ingredients are added, when processes or protocols are changed, or when new products or equipment are introduced to the plant. Dedicated tools, containers and utensils are clearly marked, or color coded to identify allergenic ingredient and or product.

Validated Allergen Cleaning Program, Overall Plant Design, Sanitation Standard Operating Procedures, Cleaning Validation Procedures, Cleaning Verification Procedures, Confirmation and Compliance, Staff Training and Education are all included in our Food Safety Allergen Control Policy.

In defining allergens Tree Top, Inc. follows the U.S. FDA (FALCPA) to label the limited number of products which utilize allergens. The specific breakdown by facility follows:

<i>Facility Name</i>	<i>Location</i>	<i>Allergen(s) Utilized</i>
Ross Plant, Dried	Selah, WA	None
Woodburn	Woodburn, OR	Wheat, Soy Lecithin, Coconut, Lychee
Oxnard	Oxnard, CA	None
Prosser	Prosser, WA	Dairy (Whey, Yogurt), Coconut
Medford	Medford, OR	None
Selah	Selah, WA	None
Wenatchee	Wenatchee, WA	None

Kosher

Tree Top, Inc. products displaying the OU symbol have been certified as kosher by the Kashruth Division of the Orthodox Union. <https://foodingredients.treetop.com/resource-library/regulatory-documents/#kosher>

Organic

Tree Top, Inc. does offer organic products. Products produced in Washington State are certified Organic by the Washington State Department of Agriculture, the facilities in Oregon are certified by Oregon Tilth. These certificates are available on our website at <https://foodingredients.treetop.com/resource-library/regulatory-documents/#organic-certificates>. Organic certification does not expire and is valid until either surrendered, suspended, or revoked.

Halal

Tree Top, Inc. products are currently not Halal certified but most are Halal compliant in that they do not contain alcohol, natural L-cysteine extracted from hair or feathers, animal fats and/or extracts, bloods of any origin, blood plasma, pork and/or other meat by-products, and alcohol is not used as a processing aid. Some products may contain flavorings that are not considered Halal compliant. Please check with your customer service representative for additional product details.

Gluten

Tree Top, Inc. has a comprehensive Supplier Verification policy. As part of this program, all suppliers are asked to disclose gluten content or contamination in the products that they provide. Some Tree Top, Inc. facilities do not utilize any ingredients that may potentially contain gluten. The following matrix indicates the Tree Top, Inc. facility name and the gluten sources that may be utilized in each facility.

<i>Facility Name</i>	<i>Location</i>	<i>Possible Gluten Sources</i>
Ross Plant, Dried	Selah, WA	None
Woodburn	Woodburn, OR	Modified Wheat Starch, Oat flour
Oxnard	Oxnard, CA	Flavoring (Cherry WONF)
Prosser	Prosser, WA	None
Medford	Medford, OR	None
Selah	Selah, WA	None
Wenatchee	Wenatchee, WA	None

Genetically Modified Organisms

Food and food ingredients from genetically engineered plants were introduced into the U.S. food supply in the 1990s. The FDA regulates the safety of foods and food products from plant sources including food from genetically engineered plants. Currently, Tree Top, Inc. only accepts fruit grown by our owner/growers or commercial growers producing industry-standard, traditional fruit varieties. Certain ingredients currently in use, such as ascorbic acid, beet sugar, some flavors and processing aids may be derived from bioengineered ingredients. Whenever possible, traditional non-bioengineered ingredients are utilized.

Irradiation

No Tree Top, Inc. products are produced with irradiation.

Sewage/Sludge

To the best of our knowledge, no products that Tree Top, Inc. produces are grown using sewage or sludge.

Vegan/BSE Status

Tree Top, Inc. produces fruit and fruit juice products. Dried apples, formulated fruit preps, fruit purees, and concentrates are made from wholesome fruit and do not contain any dairy or animal products. These products are suitable for vegetarians and vegans. No beef or animal by-products are used in the processing or production of these products.

Safety Data Sheets

Tree Top, Inc. fruit juice and fruit products are considered to be “food.” We are not aware of any chemicals that may be present in these foods that may be hazardous to your health. Since these products are considered to be “food,” they are exempt from OSHA 29 CFR 1910 (Revised July 1, 1985) and do not require an SDS (Safety Data Sheet). The above information is believed to be correct but does not purport to be all-inclusive and shall be used only as a guide.

California Proposition 65

The quality and safety of the food we produce is of the utmost importance to us. We are compliant today, to the best of our knowledge and as we are able to verify with today’s standard tests, with California’s Prop 65. CA Prop 65 regulates the limit of many chemicals found in foods or packaging and requires notification of products containing and/or exceeding such. Tree Top, Inc. uses the expertise of national food and beverage associations to stay abreast of such issues and follows recommendations on notifications and testing to remain compliant with such laws.

California Transparency in Supply Chains Act of 2010

Tree Top, Inc. is required to comply with the California Transparency in Supply Chains Act of 2010. The Act requires Tree Top, Inc. to disclose on our company’s web site, a statement disclosing to what extent, if any, we comply with a list of items that were deemed to help eradicate slavery and human trafficking from our direct supply chains for tangible goods offered for sale. Our web-site is compliant with the new law and we invite you to review our position and the steps we’re taking for human rights at <http://foodingredients.treetop.com/human-rights/>

Antibiotic Statement

Tree Top, Inc. Organic Apple products, are processed from organically grown apples. No additives, preservatives, or antibiotics have been added to this product.

C-TPAT Statement

Tree Top, Inc. is a producer of fruit juice concentrates, purees and other fruit-based products. Tree Top, Inc. does import some agricultural products and ingredients from foreign countries as well as exporting products.

At the current time, Tree Top, Inc. is not a member of the U.S. Customs and Border Patrol's Customs-Trade Partnership against Terrorism (C-TPAT). Tree Top, Inc. utilizes freight brokers and forwarders for international shipments. Tree Top, Inc. has a comprehensive security program in place to ensure the safety of the products while they are in our control.

DEHP Statement

Due to the concern of DEHP contamination, Tree Top, Inc. confirms that all Tree Top, Inc. fruit juice concentrates, juices and dried and frozen products manufactured by Tree Top, Inc. do not contain phthalates as added components mentioned below and there has been no impact on food quality for the above-mentioned products.

- 1) DEHP-Bis (2-ethylhexyl) phthalate
- 2) DINP-Di-isononyl phthalate
- 3) BBP-Butyl benzyl phthalate
- 4) DNOP-Di-n-octyl phthalate
- 5) DIDP-Di-isodecyl phthalate
- 6) DBP-Di-n-butyl phthalate

Diacetyl

Diacetyl is produced during fermentation by specific microorganisms. The apples and other fruit used by Tree Top, Inc. are harvested and stored in a manner as to maintain freshness and it is our policy to discard any fruit that may be rotten, moldy or fermented. Diacetyl is not added to any product produced by Tree Top, Inc.

Fumigation

Fumigation is specifically treating with a gaseous form of a chemical to kill a pest. Fumigation is not utilized by Tree Top, Inc. for any of the products produced nor in the trailer/containers product is shipped in. According to our Shipping Policy, all of the containers are inspected prior to loading for shipment.

Gelatin Statement

Tree Top, Inc. does not currently use any gelatin in their processes.

Melamine Statement

Melamine is an organic based chemical most commonly found in the form of white crystals rich in nitrogen and is widely used in plastics, adhesives, countertop, dishware and similar products. Addition of melamine into food is not approved by the FAO/WHO Codex Alimentarius (food standard commission), or by any national authorities.

Nanotechnology

Tree Top, Inc. does not produce any products using nanotechnology or Engineered Nanoscale Material.

PHO Statement

Tree Top, Inc. products do not contain partially hydrogenated oils (PHOs).

Radiological Hazards

Tree Top, Inc. is committed to meeting all CFR code regulations (including 21 CFR 117, food Safety and Preventive Controls and Risk Based Evaluation) and all other aspects of the Food Safety Modernization Act (FSMA) enacted

into law on January 4, 2011. As a part of the Preventive Controls requirement, a radiological risk assessment has been completed.

Tree Top, Inc. has reviewed its ingredients, packaging and environment for the potential of a radiological risk to occur. We have concluded that this risk is “unlikely to occur” based on the following:

1. Since 2011 and the Japan Fukushima incident, the FDA has had continual surveillance at the U.S. borders monitoring and testing imported food, including radiation screening of shipments. To date, the FDA has not had any findings of radionuclides from any foods with radiation levels that would pose a public health concern.
2. Tree Top, Inc. does not currently source any agricultural products, processing aids or packaging materials from Japan.
3. The Environmental Protection Agency regulates testing on radionuclides in drinking water to protect public health. Municipalities are required to test for radium-226 & 228 based on a schedule that coordinates with the detection level during the initial monitoring process. All Tree Top, Inc. facilities receive water from local municipalities and collect testing information that analyzes for possible contamination. All results indicate compliance to the standard.
4. The Nuclear Regulatory Commission’s advises, there is less risk to food and water supplies outside the 50-mile radius of our nearest Nuclear Power Plant. In the event of a failure at a Nuclear power plant, Tree Top, Inc. will follow the recommendations of the 2 emergency planning zones (EPZ) that have been created by the NRC in regards to air, food, and water supply.

Natural Statement

Currently, while the Canadian Food Inspection Agency defines of the use of the term “Natural”, many countries, including the United States, have not defined and regulated the broad term “Natural” as it applies to foods. According to the U.S. Food & Drug Administration website, the FDA has considered the term “natural” to mean that nothing artificial or synthetic (including all color additives regardless of source) has been included in, or has been added to, a food that would not normally be expected to be in that food. However, this policy was not intended to address food production methods, such as the use of pesticides, nor did it explicitly address food processing or manufacturing methods, such as thermal technologies, pasteurization, or irradiation. The FDA also did not consider whether the term, “natural” should describe any nutritional or other health benefit.

Patulin

Patulin is a mycotoxin produced by certain species of mold that will grow on apples. Based on a review of current scientific evidence, the FDA concluded that Patulin be considered a toxic substance and set a regulatory action guidance limit of 50 micrograms per kilogram (50 parts per billion) as determined on single strength juice, reconstituted single strength juice, or the single strength apple juice component of the food. Beyond these products, the FDA has **not** set an action level for Patulin, e.g. dried apples, purees or other formulated fruit preps. Tree Top, Inc. policy addresses Patulin in Apple juice products (Apple juice, apple juice concentrate, and apple puree) and controls Patulin through utilizing a stringent inspection process at the time of receipt, as well as the first step in processing of the apples and a thorough fruit washing step is completed prior to processing the apples.

Pesticide Program

Tree Top, Inc. growers use pesticides approved for use in the United States. Tree Top, Inc. has a pesticide residue monitoring program for unprocessed fruit and finished product types. This program is used to assure that the pesticide residue levels are in compliance with State, EPA and FDA regulations.

Heavy Metals

Tree Top, Inc. has an annual heavy metals monitoring program, where random samples are collected and analyzed. Analysis included arsenic, cadmium, and lead, which are completed by our ISO 17025:2005 accredited corporate laboratory. All results are trended and reviewed by our corporate quality staff. Results are in compliance with FDA regulatory guidelines. Reports of analysis may be available for the product group of your immediate need.

Laboratory Testing

Ceres Analytical, LLC a subsidiary of Tree Top, Inc. has procedures in place regarding test methods, training, calibrations, and proficiency testing. Ceres Analytical, LLC is an accredited lab capable of testing Pesticides, Heavy Metals, and Patulin, Nutritional and Microbiological. A scheduled program of product testing is in place for products including microbiological, chemical, physical, and organoleptic. Results are recorded and reviewed for trends. Ceres Analytical, LLC methods comply with current AOAC Methods and the Compendium of Microbiology for Foods.

Third party laboratories may be used as required by external customers or as needed. All third-party laboratories used by Tree Top, Inc. must have ISO/IEC 17025:2005 accreditation, renew their accreditation annually and provide a copy of their Certificate of Accreditation and scope.

Food Grade Statement

Tree Top, Inc. produces products that are considered food grade and are suitable for human consumption.

Food Contact Packaging

All food contact packaging used for Tree Top, Inc. products meets all applicable FDA regulations for use.

Letter of Guarantee/Certificate of Insurance

Letters of Guarantee and Certificates of Insurance can be provided upon request.

For a complete description, please visit our website at <http://foodingredients.treetop.com/resource-library/regulatory-documents> or contact your Sales Representative for additional information.

Facility Information

Each manufacturing facility is of appropriate size, location, construction, and design to allow manufacture of safe and compliant finished products. Equipment used is suitable for the intended purpose.

Tree Top, Inc. Selah Plant

205 South Railroad Avenue, Selah, WA 98942

Phone: 509-698-1430

Built in 1972, the Selah Plant is Tree Top, Inc.'s largest retail packaging facility. This manufacturing location has six production lines and a variety pack line capable of repackaging WIP products into a multitude of finished product configurations within 477,000 sq. ft. of manufacturing and warehouse space. This facility not only packages finished products into various PET container sizes, flexible packaging pouches, aluminum cans, and aseptic bags for our brand, it also contract manufactures products for other national retail brands. This facility also processes apples into fresh pressed cloudy or clarified apple juice for immediate finished product packaging, as well as evaporates apple juice into concentrate for future packaging.

Operation: This facility operates 7 days a week/3 shifts per day with approximately 250 employees (Union)

Water Resource: Municipal

Allergens: None

Lines & Controls: **Juice Lines 2 P.E.T. & 4 Aluminum Cans** - Pasteurization & In-line Filter (Filter size based on product type and requirement documented in specifications).

Cup Line 8 Polypropylene – Pasteurization & Screen (1/4 - inch, Mesh Basket)

Multi-Serve Line 3 P.E.T. Applesauce - Pasteurization & Screen (1/4 - inch, Mesh Basket) **Pouch**

Lines #5 & 9 Flexible Form, Fill and Seal – Pasteurization & inline metal detection (Test) **Aseptic**

Line # 7 Drum and Bag 'n Box – Pasteurization & Screen (1/4 - inch, Mesh Basket)

Pouch Lines #10 Flexible Form, Fill and Seal – Pasteurization & inline metal detection (Test)

Tree Top, Inc. Prosser Plant

2780 Lee Road, Prosser, WA 99350

Phone: 509-698-1430

Built in 1965, the Prosser manufacturing facility is approximately 180,000 sq. ft. and produces clarified hard and soft fruit juice concentrates as well as producing retail products, such as composite frozen 3+1 and 5+1 juice cans, flexible packaging to include sauce tubes and capped pouches, as well as RTD 46 oz. juice in tin . This facility also contract manufactures products for other national retail brands and manages custom concentrate production and blends for numerous customers.

Operation: This facility operates 7 days a week/3 shifts per day with approximately 130 employees (Non-Union)

Water Resource: Municipal

Allergens: Whey, Yogurt

Lines & Controls: **Tube Line 1 Flexible Form, Fill and Seal** – Pasteurization & In-Line Magnet

Juice & Juice Concentrate Line 2 Composite Cans – Pasteurization & In-line Filter (Filter size based on customer specific requirement).

Juice Line 3 Tin Cans – Pasteurization & In-line Filter (Filter size based on product type and requirement documented in specifications).

Pouch Line 4 Flexible Packaging – Pasteurization and in-line metal detection, allergen control, process temperature adjustments based on product pH variability.

Tree Top, Inc. Ross

101 South Railroad Avenue, Selah, WA 98942

Phone: 509-698-1432

Built in 1930 with significant Technology Improvement in the mid 80's, the Ross Plant is one of two Tree Top, Inc. dried fruit manufacturing facilities and produces evaporated, low and intermediate moisture apples, as well as drum dried fruits. This facility of, 103,890 sq. ft., produces dried apples in many sizes, from powders, flakes, puffs, dices, slices, and rings to 1/8" x 1/8" apple chips, and offers a wide range of specialty concentrate infused or colored and flavored apples.

Operation: This facility operates 7 days a week/3 shifts per day with approximately 135 employees (Non-Union)

Water Resource: Municipal

Allergens: None (Pending allergens: Soy lecithin, Modified Wheat Starch)

Lines & Controls: **EVAP:** In-line magnets, optical sortation, heat step (CCP#0 drying step) in-line product metal detection (CCP#1), case metal detection (CCP #2) Slurry receiving, and slurry loading

DD: In-line magnets, optical sortation, heat exchanger step (CCP#5) in-line product metal detection (CCP#1), case metal detection (CCP2)

Grind Line: In-line product metal detection (CCP#1),

This line utilizes feedstock produced on the EVAP line (has undergone a CCP heat step)

Tree Top, Inc. Wenatchee

3981 State Highway 97A, Wenatchee, WA 98801

Phone: 509-663-8583

Built in 1965, The Wenatchee Plant is a 76,800 sq. ft. production facility situated along the Columbia River. This plant produces low and intermediate moistures apples in numerous fruit flavors for use in cereal and snack bar products.

Operation: This facility operates 5-7 days a week/3 shifts per day with approximately 125 employees (Union)

Water Resource: Municipal

Allergens: None

Lines & Controls: **Low Moisture Single Pass and Puff Apples:** In-line magnets, optical sortation, heat step (CCP#1drying step) in-line product metal detection (CCP#2), case metal detection

Low Moisture Single Pass 4 M Apple Granules: In-line magnets, optical sortation, heat step (CCP#1 drying step) in-line product metal detection (CCP#2), case metal detection

Rescreen Low Moisture Apple Powder and Granules: In-line product metal detection (CCP#1), case metal detection.

Tree Top, Inc. Medford

690 S. Grape Street, Medford, OR 97501

Phone: 541-772-5653

Built in 1967 this facility is 315,000 sq. ft. and operates approximately 10 months out of the year to turn fruit into single strength and concentrate purées, as well as formulated fruit sauces that are used for conventional, organic, and baby food.

Operation: This facility operates 5-7 days a week/3 shifts per day with approximately 150 employees (Non-Union)

Water Resource: Municipal

Allergens: None

Lines and Controls: **Purees (Concentrates and single strength)**: Sorters, filters, magnets, and metal detector

Tree Top, Inc. Oxnard

1250 E. 3rd Street, Oxnard, CA 93030

Phone: 805-483-3030

Built in 2013 The Oxnard facility is approximately 50,000 sq. ft. and creates ingredients for the food manufacturing industry such as puree, whole and sliced fruit; heat treated, non-heat treated, or frozen. These ingredients are used in many items such as ice cream, yogurt, bakery, and drinks.

Operation: This facility operates 5 days a week/2 shifts per day with approximately 50 employees (Union)

Water Resource: Municipal

Allergens: None

Lines and Controls: **Fresh Pack Lines 1, 2, 3**: sorters and magnets

Commodity Pak Line 3: sorters, magnets and metal detection

Puree: line metal detection

Industrial Line: contains screens (used for puree only), magnets and metal detection

Tree Top, Inc. Woodburn

1440 Silverton Road, Woodburn, OR 97071

Phone: 503-982-2097

Built in 1962, the Woodburn Plant processes soft fruit into ingredients for the food manufacturing industry including: fresh berry packs, formulated fruits, fruit preps, single strength purees, puree concentrates, and dried fruit flakes. They also blend and process ingredients into flexible baby food pouches in this 73,200 sq. ft. facility

Operation: This facility operates 5 days a week/2 shifts per day with approximately 60 employees (Non-Union)

Water Resource: Municipal

Allergens: Coconut, Lychee, Soy Lecithin, Modified Wheat Starch

Lines and Controls: **Formulated and Flake Line**: contains in-line screens, magnets, and metal detector.

Concentrate Line: contains screens and magnets.

Index	Page #	Page #
Allergens	12	Quality Management 5
Antibiotic Statement	14	Radiological Hazards 15
California Proposition 65	14	Recall & Trace 10
California Transparency in Supply Chains Act 2010	14	Regulatory Compliance 5
Change Management	10	Rework vs. Reprocess 12
Complaints	10	Safety Data Sheets 14
Crisis/Disaster Program	5	Sample Retain Program 7
C-TPAT Statement	14	Sanitation 6
Current Good Manufacturing Practices	6	Sewage/Sludge 14
Customer Questionnaire Response	1	Shipping and Receiving Requirements 14
DEHP Statement	15	SQF Program 7
Diacetyl	15	Supplier Management 8
Employee Welfare	4	Sustainability/Corporate Responsibility 4
Environmental Monitoring Program	7	Training 6
Ethics and Code of Conduct	5	Tree Top, Inc. Mission and Values 4
Facility Information	18	Tree Top, Inc. Medford 19
FDA Registration	9	Tree Top, Inc. Oxnard 20
Food Contact Packaging	17	Tree Top, Inc. Prosser 18
Food Defense	8	Tree Top, Inc. Ross 19
Food Grade Statement	17	Tree Top, Inc. Selah 18
Food Safety / HACCP	7	Tree Top, Inc. Wenatchee 19
Foreign Material	10	Tree Top, Inc. Woodburn 20
Fumigation	15	Vegan/BSE Status 14
Gelatin Statement	15	Water 6
Genetically Modified Organisms	13	
Gluten	13	
Halal	13	
Heavy Metals	16	
Hold for Non-Conforming Product	12	
Irradiation	14	
Kosher	13	
Laboratory Testing	17	
Legal Company Name:	4	
Letter of Guarantee/Certificate of Insurance	17	
Melamine Statement	15	
Nanotechnology	15	
Natural Statement	16	
Organic	13	
Patulin	16	
Pest Control	6	
Pesticide Program	16	
PHO Statement	15	
Preventative Maintenance	6	
Product Lot Coding	11	