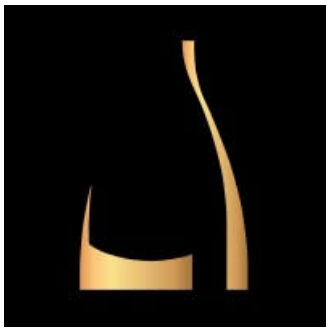

MARK ANTHONY BREWING
SUPPLIER QUALITY EXPECTATIONS MANUAL

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Contents

1. INTRODUCTION

1.1. PURPOSE AND COMMITMENT

Mark Anthony Brewing (MAB) is committed to delivering safe, high-quality beverage products through trusted partnerships with suppliers who share our values and standards. This manual outlines MAB's expectations for food safety, regulatory compliance, and quality assurance for all suppliers of ingredients, packaging materials, and services supporting our operations.

Our guiding principles – Best in Our Craft, Ambitiously Curious, Made with Humility, and Daringly Disruptive – drive our pursuit of excellence and innovation. As essential partners in this journey, suppliers must align with our standards to ensure consumer safety, regulatory compliance, and continuous improvement.

Suppliers must maintain full compliance with this manual unless supply agreements, product specifications, or federal, state, or local regulations supersede or alter these requirements. We encourage suppliers to strive for continuous improvement and operational excellence, and to target performance that exceeds the requirements established in this document.

1.2. SCOPE AND APPLICATION

This manual applies to the following suppliers:

Direct Materials:

- Ingredients.
- Primary packaging materials (aluminum cans, glass bottles, labels, plastic bottles, PET preforms/resin, and closures including metal crowns, bottle caps, and others as applicable).
- Secondary packaging materials (corrugated and paperboard packaging materials, pallets, shrink wrap, and others as applicable).

Services:

- Contract manufacturing and co-packing services.
- Raw material warehousing and storage services.
- Supply chain intermediary services for ingredient and packaging material procurement.

This manual applies risk-based requirements as defined in Section 1.3. High-risk suppliers must comply with all requirements unless specifically exempted, while low-risk suppliers may have modified requirements as indicated throughout this manual. All suppliers must comply with applicable local, state, federal, and international regulations. When MAB requirements exceed regulatory standards, the requirements in this manual shall take precedence.

1.3. SUPPLIER CATEGORIES AND RISK-BASED REQUIREMENTS

1.3.1. SUPPLIER CATEGORY DEFINITIONS

Detailed operational requirements for each category are specified in Section 7.1.

Direct Ingredient Suppliers manufacture ingredients used directly in the production of finished good products.

Primary Packaging Suppliers manufacture packaging materials that directly contact liquids in finished good products (examples are defined as cans, bottles, closures).

Secondary Packaging Suppliers manufacture packaging materials that do not contact liquids in finished good products (examples are defined as corrugated boxes, cartons, shrink wrap).

Contract Manufacturers/Co-Packers use ingredients and packaging materials to produce finished products for Mark Anthony Brewing.

Supply Chain Intermediaries (Brokers/Distributors) procure ingredients or packaging materials from downstream manufacturing suppliers and re-sell those materials to Mark Anthony Brewing without adding any further processing steps.

Raw Material Warehouses store raw materials with requirements focused on proper storage conditions, inventory management, and traceability systems.

Hybrid Suppliers produce direct materials and/or provide services that may fall into more than one supplier category.

1.3.2. RISK-BASED REQUIREMENTS FRAMEWORK

High-Risk Suppliers (*Direct Ingredients, Primary Packaging, Contract Manufacturers*) have the highest potential to introduce food safety defects into MAB's finished goods. These suppliers must maintain GFSI certification and undergo annual third-party audits with ongoing monitoring.

Medium-Risk Suppliers (*Secondary Packaging, Packaging Components*) contribute indirectly to product safety by providing materials that do not contact the beverage but still influence overall quality and regulatory compliance. Any issues that arise typically impact brand perception or compliance rather than posing an immediate health risk to consumers. These suppliers must maintain GFSI certification and undergo annual third-party audits with ongoing monitoring.

Low-Risk Suppliers (Pallets, Shrink-wrap, Labels, Supply Chain Intermediaries, Warehouses) do not produce or manufacture materials with a high risk of introducing food safety defects into MAB's finished goods. This category of suppliers may take title, store, and/or transport high risk materials prior to re-selling such materials to Mark Anthony Brewing, but do not have a high risk of introducing food safety defects. These suppliers must implement basic quality management systems appropriate to their operational scope and undergo risk-based audits typically every 2 – 3 years.

CATEGORY	RISK LEVEL		
	HIGH	MEDIUM	LOW
	PET	Basket/ Carton	Non-critical Cleaning Chemicals
	Container - Bottles	Corrugate	Pallets
	All other liquid ingredients	Packaging Adhesives	Labels
	Dextrose & HFCS		Shrinkwrap
	Container - Can & End		
	Acids		
	Co-Packer		
	Flavors		
	Sugars		
	Closure - Crown		
	Closure - Cap		
	Blenders		
	Juice		
	Dextrose		

Supply Chain Intermediaries must disclose and obtain approval for all upstream manufacturing suppliers prior to approval. Detailed requirements for intermediary approval are specified in Section 7.1.5.

Detailed operational requirements and enhanced measures for each risk category are specified in Section 7.1.

1.4. COMPLIANCE AND ACCOUNTABILITY

Supplier Responsibilities: Suppliers must maintain compliance with this manual and all applicable regulations, including FDA requirements for non-alcoholic beverage ingredients, TTB regulations for alcoholic beverage materials, and all state and local licensing requirements. Additionally, each supplier must implement effective food safety and quality management systems and provide complete and accurate documentation that demonstrates compliance.

Non-Compliance Escalation: Supplier performance issues and potential relationship termination are addressed through the performance management framework detailed in Section 5.3.

1.5. CHANGE CONTROL AND MANAGEMENT

Suppliers must have documented change control procedures and notify MAB with proper lead time of any changes that may affect product safety, quality, or specifications. All changes must be approved prior to implementation and submitted through documented change control procedures. Change submissions must include: written business justification, impact assessment, risk analysis, supporting documentation, and implementation timeline. Post-implementation verification and documentation retention are mandatory.

Critical Changes (affecting safety, regulatory compliance, facilities, or significant cost impacts): Require Vice President-level written approval from MAB and a minimum of 6 months' advance notice from Supplier to MAB.

Significant Changes (affecting product performance, processing efficiency, cost, or supply reliability): Require Director-level written approval from MAB and a minimum of 60 days' advance notice.

Minor Changes (administrative changes with minimal impact): Require Manager-level written approval from MAB and a minimum 30 days' advance notice.

Emergency Changes: Emergency changes may be implemented immediately upon receiving verbal Vice President-level approval from MAB, provided an immediate safety risk exists that outweighs change control requirements. MAB will provide written confirmation within 24 hours. Emergency changes require expedited documentation and post-implementation verification within 7 days.

Supply Chain Security Changes: Changes affecting supplier security status, including new transportation routes, storage facilities, or supply chain intermediaries, require enhanced notification protocols. Security-sensitive changes must include risk assessment documentation and may require a Mark Anthony Brewing security review before implementation.

2. QUALITY MANAGEMENT

2.1. MANAGEMENT COMMITMENT AND POLICY

Leadership Requirements: Suppliers must maintain a documented food safety and quality policy statement that is authorized by senior management that demonstrates measurable commitment to safety and quality. The policy must specify commitment to continuous improvement, compliance with MAB requirements, and the supply of safe materials for beverage operations. Management must display and communicate this policy throughout the organization in languages understood by all employees, with annual reviews to ensure continued relevance.

Senior management must conduct documented management review meetings annually (quarterly preferred for high-risk suppliers). Reviews must include the following: food safety objectives assessment, policy effectiveness evaluation, internal audit results analysis, corrective action status updates, and resource adequacy verification for food safety initiatives.

Organizational Structure and Resources: Suppliers must maintain documented organizational structures with clear food safety accountability to senior management. A single designated person must have overall system accountability. Suppliers must provide adequate resources and communication protocols to ensure employee understanding of food safety responsibilities.

2.2. CERTIFICATIONS AND STANDARDS

2.2.1. GFSI CERTIFICATION REQUIREMENTS

High-Risk suppliers must maintain current GFSI certification (BRC, SQF, FSSC 22000, or IFS) with annual surveillance audits. Medium-Risk and Low-Risk suppliers must maintain basic quality management systems appropriate to their operational scope.

2.2.2. REGULATORY COMPLIANCE

All suppliers must maintain current regulatory compliance as detailed in Section 4. Suppliers must provide immediate notification to Mark Anthony Brewing of any status changes affecting supplied materials.

2.2.3. REGULATORY COMPLIANCE DOCUMENTATION

Documentation Requirements: Suppliers must maintain current documentation demonstrating regulatory compliance, including facility registrations, permits, and certifications. Documentation must be readily accessible during audits and updated within 30 days of any changes.

Compliance Monitoring: Suppliers must establish procedures for monitoring regulatory changes affecting their operations and supplied materials. Changes in regulatory status must be communicated to Mark Anthony Brewing within 48 hours of receiving notification of such changes.

2.3. QUALITY PERFORMANCE MONITORING AND INTERNAL CONTROLS

Suppliers must establish comprehensive internal audit procedures and performance monitoring systems in accordance with Section 5.4.2. Mark Anthony Brewing audit rights and procedures are detailed in Section 5.4. All suppliers of packaging components must supply materials that conform to an agreed-upon and approved specification. Suppliers are expected to have a demonstrated process capability to consistently meet these specifications using appropriate statistical process control (SPC) methods. The capability data must be available upon request, and any significant deviation from the agreed specification must be communicated and resolved prior to shipment. Ongoing compliance and continuous improvement in process stability and capability are fundamental expectations.

2.4. CONTINUOUS IMPROVEMENT

Improvement Program Requirements: Suppliers must implement documented continuous improvement processes that include: training and awareness programs promoting an improvement mindset; appropriate improvement tools utilization; systematic project management with defined ownership; adequate resource allocation for improvement activities; and results tracking with effectiveness documentation.

Senior leadership responsibilities include the following: establishing measurable improvement goals; regular progress assessment; providing necessary resources; implementing recognition programs for successful contributions; and integrating improvement activities with business objectives.

Communication and Documentation: Improvement programs must include regular progress reporting to stakeholders; documentation and dissemination of successful methods; capturing and applying lessons learned; and stakeholder engagement in improvement activities. Suppliers must demonstrate ongoing commitment to exceeding minimum requirements through measurable improvement initiatives and performance enhancement programs.

Improvement Tools: Suppliers are encouraged to integrate continuous improvement methodologies such as Six Sigma, Lean, and Kaizen with documented ownership of key metrics, projects, reports, and reviews.

2.5. CRISIS MANAGEMENT AND EMERGENCY RESPONSE

Suppliers must maintain documented crisis management programs addressing supply contingency, emergency contact information, and incident response in addition to product recalls. The program must clearly define what constitutes a crisis, ensure personnel awareness, and include incident reporting procedures.

Crisis management must address: key services disruption; fire, flood, or natural disaster; malicious contamination; disease and/ or pandemic; regulatory investigations; loss of relevant certifications; and voluntary or involuntary recalls.

Suppliers must maintain current lists of key staff and external contacts, including government inspectors, customers, and certification bodies. Additionally, suppliers must notify Mark Anthony Brewing immediately of critical incidents affecting supply, in accordance with Section 6.2.2 emergency communication requirements.

2.6. TRAINING AND COMPETENCY REQUIREMENTS

2.6.1. GENERAL TRAINING REQUIREMENTS

Suppliers must maintain comprehensive training programs covering job descriptions, food safety, quality, and regulatory requirements, with training conducted by qualified individuals and documented competency verification.

All training programs must include: initial food safety training before starting work; annual refresher training for all employees; job-specific training covering individual responsibilities; documented competency verification through testing or observation; and effectiveness verification demonstrating practical application of training content.

Master training records must include the following: participant information, training content, completion dates, trainers, competency verification results, and effectiveness of assessment. Training records must be maintained for the employment period plus 3 years.

2.6.2. FOOD SAFETY SPECIFIC TRAINING

All personnel must complete comprehensive training programs covering hygiene and GMP compliance, including: hand-washing procedures and hygiene practices; employee health assessment and illness reporting procedures; protective clothing requirements and proper use; visitor control procedures; and personal item restrictions in production areas.

2.6.3. SPECIALIZED ROLE TRAINING

HACCP Training: HACCP-specific training for CCP monitoring personnel with documented competency verification, including training on critical control point monitoring, corrective action procedures, and record keeping requirements.

Laboratory Personnel Training: Microbiological testing personnel training for laboratory safety protocols and contamination prevention, including proper microbiological hazard containment procedures and cross-contamination prevention.

Allergen Management Training: All personnel must complete comprehensive allergen awareness training covering allergen risks and control procedures, with annual updates. Training must address: major allergen identification; cross-contact prevention procedures;

cleaning validation requirements for allergen changeovers; storage and handling procedures for allergenic materials; and emergency response procedures for allergen incidents.

Food Defense and Security Training: Food defense and security training for employees in sensitive positions, including: recognition and reporting of suspicious activities; access control procedures; ingredient storage security; and incident response procedures for threats or suspected contamination.

2.6.4. DOCUMENTATION AND COMPETENCY VERIFICATION

All training must include documented competency verification through testing or observation, with effectiveness verification demonstrating practical application of training content. Training records must demonstrate ongoing competency and be available for review during audits. Retraining is required when competency verification indicates deficiencies or when significant process changes occur affecting employee responsibilities.

3. FOOD SAFETY MANAGEMENT

3.1. HACCP IMPLEMENTATION

Suppliers must implement a comprehensive HACCP program established by a multi-disciplinary team led by a HACCP certified individual. The team must meet regularly with annual plan reviews at a minimum and immediate reviews following significant changes. Teams must maintain comprehensive hazard analysis addressing biological, chemical, physical, and allergen hazards specific to beverage ingredient applications with validated critical control points and documented monitoring procedures. HACCP team personnel must complete specialized training in accordance with Section 2.6.3.

HACCP plans must include: scientific justification for critical limits with supporting validation studies; continuous or batch monitoring appropriate to the process and hazard; trained personnel with clear responsibilities and backup coverage; real-time corrective action capabilities; flow diagrams showing all process steps, rework points, and outsourced operations; and complete monitoring records with signatures, dates, and actual values. Records must be retained in accordance with Section 6.3.1 retention standards.

3.2. METAL DETECTION AND FOREIGN OBJECT PREVENTION

Equipment and Validation: Metal detectors and x-ray devices must detect ferrous, non-ferrous, and stainless steel contaminants, with validation through 30 consecutive successful detections for each metal type. Detection sensitivity requirements: products in apertures smaller than 7 inches must achieve 1.3mm ferrous, 1.5mm non-ferrous, and 2.0mm stainless steel; larger apertures require 1.5mm ferrous, 2.0mm non-ferrous, and 2.5mm stainless steel detection capability.

Testing and Monitoring: Metal detection devices must be tested under the following conditions: at the beginning and end of each production run; before and after changeovers; after extended downtimes; and at a minimum of once per shift during continuous operations. Testing must use certified test pieces placed in the geometric center of the aperture. All detections and rejects must be documented and investigated. Rejected materials must be immediately segregated and cannot be reintroduced into production.

Alternative Controls: When traditional detection is not feasible, suppliers may use: screening devices of 50 mesh or smaller for liquids and 30 mesh or smaller for dry ingredients, with weekly integrity inspections; or magnets validated for strength and inspected at a minimum of once per shift with documented findings.

Product-Specific Validation: Systems used with glass containers or specialized beverage ingredients must be validated for sensitivity based on specific product characteristics using actual production materials.

3.3. PREREQUISITE PROGRAMS

3.3.1. PERSONNEL HYGIENE AND GMP REQUIREMENTS

All suppliers must implement comprehensive GMP programs that include: hand-washing facilities with appropriate supplies; employee health assessment and illness reporting procedures; protective clothing appropriate to operations; visitor control that ensures equivalent hygiene standards; and personal item restrictions in production areas. Personnel training for hygiene and GMP compliance must follow the comprehensive training requirements established in Section 2.6.2.

3.3.2. GLASS AND BRITTLE MATERIALS CONTROL

Glass, Brittle Plastic, and Ceramics Control Program: This section applies to all suppliers with glass, brittle plastic, or ceramics in their facilities, including contract manufacturers using glass packaging and glass bottle manufacturers.

General Requirements: All facilities must minimize glass, brittle plastic, and ceramics use within processing, packaging, and storage areas. All glass components in processing areas require: documented inventory; regular inspection schedules; immediate replacement protocols for damaged items; and documented procedures for breakage response, including immediate area isolation, product hold and evaluation, thorough cleanup with verification, and investigation to prevent recurrence.

Contract Manufacturers Using Glass Packaging: When contract manufacturers use glass bottles as primary packaging, additional controls must include the following: incoming inspection procedures that verify structural integrity and absence of defects; handling procedures that prevent breakage during filling and packaging operations; and immediate cleanup protocols for any glass breakage, with product isolation and contamination assessment.

Glass bottle filling lines require enhanced monitoring for container integrity, rejection systems for damaged bottles, and employee training on glass handling safety and contamination prevention in accordance with Section 2.6.2 food safety training requirements.

3.3.3. SANITATION AND CHEMICAL CONTROLS

Sanitation Programs: Suppliers must maintain the following: master sanitation schedules detailing cleaning methods and frequencies; validated CIP/COP systems with documented parameters; effectiveness verification through visual inspection and analytical verification methods; and documented procedures for equipment disassembly and reassembly.

Chemical Management: Suppliers must implement: approved chemical lists with safety data sheets; segregated storage that prevents ingredient contamination; food-grade lubricants for equipment in product contact areas; clear labeling systems that distinguish food-grade materials; and cleaning chemical validation that ensures appropriate concentrations and contact times.

Cleaning Validation Programs: All cleaning validation must demonstrate complete removal of previous contents and cleaning chemicals, with analytical verification appropriate to subsequent use. Validation requirements include: multi-use container validation procedures for container inspection and approval before reuse, with documented analytical verification; allergen changeover validation requiring dual sign-off by separate trained inspectors when changing from allergen to non-allergen products; and production line changeover validation of the effectiveness of cross-contamination prevention between different products or customers.

3.4. ENVIRONMENTAL CONTROLS AND MONITORING

3.4.1. WATER QUALITY MANAGEMENT

Potable Water Standards: Suppliers must maintain potable water meeting EPA drinking water requirements with annual testing from multiple facility sampling points. Water treatment systems must be appropriately maintained with documented water quality results and corrective actions.

Process Water Controls: When ingredients contact water during processing, suppliers must implement documented testing and treatment system validation. Compressed air systems must meet food-grade standards when contacting ingredients.

Water System Monitoring: Water quality management must include regular sampling, documented corrective actions for excursions, and validation of treatment system effectiveness.

3.4.2. MAINTENANCE AND INFRASTRUCTURE

Maintenance Programs: Suppliers must maintain the following: preventive maintenance schedules for food safety-critical equipment; calibration programs in accordance with Section 7.4; temporary repair protocols that ensure food safety integrity; contractor management ensuring GMP compliance; and documentation systems that track maintenance activities and safety assessments.

Foreign Object Prevention Design: Suppliers' facility design and maintenance programs must include specific measures to prevent metal and foreign object contamination including regular inspection and maintenance of processing equipment to identify and address potential sources of metal contamination, including: secure installation of equipment and utilities to prevent loosening or degradation; use of food-grade materials in construction and maintenance activities; implementation of glass and brittle plastic policies with regular inspection procedures; and facility design measures that prevent pest entry in accordance with Section 3.4.4.

3.4.3. FACILITY ENVIRONMENTAL CONTROL SYSTEMS

General Environmental Control Requirements: All facilities must maintain documented environmental controls appropriate to their operations, including: temperature monitoring and control systems with documented ranges appropriate to specific materials and processes; humidity control systems that prevent condensation and maintain material stability, with documented monitoring procedures; HVAC systems that provide adequate air exchange rates and filtration to prevent cross-contamination; and environmental monitoring with continuous recording systems and alarm procedures for excursions beyond established limits.

Storage-Specific Environmental Controls: Storage areas must implement: environmental controls that prevent moisture absorption and temperature fluctuations; segregation systems preventing cross-contamination between different materials using physical barriers and identification procedures; and specialized storage conditions including controlled atmosphere storage where required.

Facility Design for Environmental Control: Manufacturing facilities must implement proper workflow design to prevent cross-contamination and adequate space allocation for equipment maintenance and cleaning operations. Facility layout must support effective environmental monitoring and control systems.

3.4.4. ENVIRONMENTAL MONITORING PROGRAMS

Risk-Based Monitoring: Suppliers must implement: environmental pathogen monitoring for facilities with ready-to-drink product exposure; sampling protocols based on hygienic zoning concepts; pathogen and indicator organism testing appropriate to product risk; corrective action procedures for positive results in accordance with Section 6.2.4; and trend analysis that identifies patterns requiring preventive action.

Environmental Sampling: Environmental monitoring must include regular sampling protocols and trend analysis for environmental parameters beyond water quality.

Integrated Pest Management: Suppliers must maintain the following: an internally approved list of licensed pest control operators with documented certification; facility pest control maps showing monitoring and control device locations; monthly inspection reports with trend analysis and corrective action documentation; exclusion methods that prevent pest entry through facility design; employee training on pest awareness and reporting in accordance with Section 2.6.2; and sanitary waste handling that prevents contamination and pest attraction. The licensed operators must conduct annual risk assessments and provide corrective actions.

3.4.5. PATHOGEN ENVIRONMENTAL MONITORING

Suppliers must implement pathogenic environmental monitoring programs with the following sampling zones: Zone 1 (food contact surfaces), Zone 2 (non-contact surfaces near product), Zone 3 (peripheral production areas), and Zone 4 (non-production areas). Suppliers are to monitor Zones 2 and 3 monthly in high-risk areas and quarterly in basic GMP areas. Suppliers must target Salmonella in dry environments, and both Salmonella and Listeria in wet environments. Positive results require immediate corrective actions, vector sampling, and three consecutive negative samples for remediation in accordance with Section 6.2.4.

3.5. FOOD DEFENSE AND FRAUD PREVENTION

3.5.1. FOOD DEFENSE PROGRAMS

Suppliers must implement these food defense measures: conduct annual vulnerability assessments that identify intentional contamination risks; establish multi-disciplinary food defense teams with defined responsibilities; implement access control systems that limit unauthorized personnel in critical areas; conduct background screening for employees in sensitive positions where legally permitted; and maintain incident response procedures for threats or suspected contamination.

Suppliers must maintain the following security controls: ingredient storage security that prevents unauthorized access to bulk materials; processing area controls that monitor high-risk processing points; shipping and receiving security that verifies material integrity; chemical storage security that controls cleaning and sanitizing chemical access; and employee awareness training for recognizing and reporting suspicious activities in accordance with Section 2.6.3.

3.5.2. FOOD FRAUD PREVENTION

Vulnerability Assessment: Suppliers must conduct regular assessments that include the following: economic motivation analyses to identify high-risk ingredients and suppliers; supply chain mapping to identify vulnerabilities in sourcing; monitoring of market intelligence for fraud incidents and industry alerts; implementation of testing and verification programs to detect potential adulteration; and supplier verification to ensure robust fraud prevention measures are in place.

Ingredient Fraud Risks: Suppliers must implement controls to mitigate ingredient fraud, including but not limited to: sweetener authentication to prevent substitution or dilution of sweetener types and corn syrups; verification of flavor integrity to ensure the authenticity of flavoring systems; confirmation of alcohol content in alcohol-containing ingredients; verification of organic claims against specifications where applicable; and country of origin verification for imported ingredients, including documentation checks and supply chain validation to prevent origin fraud.

3.6. ALLERGEN MANAGEMENT

Comprehensive allergen management must address major allergens (peanuts, tree nuts, eggs, milk, fish, crustacean shellfish, sesame, soybeans, and wheat) and additional allergens regulated in countries of manufacture or sale (mollusks, mustard, sunflower seeds, sulfites, cereals containing gluten, coconut, and mango). Facilities must implement allergen management strategies in priority order. These strategies include: dedication of manufacturing locations or production lines to products containing the same allergens; physical separation and barriers between lines running different allergenic products, with production scheduling that minimizes cross-contact opportunities; and cross-contact labeling only when the presence of allergens can be confirmed through analytical means and risk is unavoidable despite current GMPs.

Cleaning Validation: Cleaning validation for allergen changeovers must follow the requirements established in Section 3.3.4.

Storage and Control Procedures: Allergen control programs must include the following: physical segregation or dedicated storage areas with unique labeling; tool and container control programs that prevent cross-contamination through color coding or dedicated tools; and rework

procedures that ensure same-into-same only policies, with clearly defined staging areas and immediate use during production runs.

Training and Documentation Requirements: All personnel must complete comprehensive training programs in accordance with Section 2.6.3 requirements, covering allergen risks and control procedures, with annual updates. Additionally, suppliers must maintain documentation and label verification procedures that ensure accurate allergen declarations and ingredient identification.

3.7. PASTEURIZATION REQUIREMENTS

Liquid Ingredient Pasteurization: Suppliers providing pasteurized liquid ingredients must maintain validated thermal processing procedures with documented time and temperature parameters appropriate to the specific ingredient and intended application. Pasteurization validation must include the following: microbiological challenge studies demonstrating achievement of required log reductions; continuous monitoring of critical control points with calibrated instrumentation; and complete batch records documenting actual time and temperature parameters achieved. Suppliers must also maintain equipment calibration in accordance with Section 7.4 for all temperature and time monitoring devices, and provide certificates of analysis confirming pasteurization effectiveness for each lot.

Packaging Pasteurization: When packaging materials require thermal treatment or sterilization, suppliers must document validated processes with specific time, temperature, and pressure parameters where applicable. This documentation must include: validation studies confirming sterility achievement; monitoring procedures that ensure process parameters are maintained; and documentation demonstrating that packaging integrity is maintained throughout the thermal treatment process. Contract manufacturers implementing packaging pasteurization must validate that packaging materials maintain food contact compliance and structural integrity following thermal treatment.

Process Documentation: All pasteurization processes must include the following: validated critical control limits with supporting scientific justification; continuous monitoring procedures with documented corrective actions for deviations; retention of process records for product shelf life plus a minimum of 2 years; and immediate notification to MAB of any pasteurization process failures or deviations affecting product safety.

4. REGULATORY COMPLIANCE

4.1. U.S. FEDERAL COMPLIANCE REQUIREMENTS

Suppliers must comply with all applicable U.S. federal regulations governing food safety, labeling, manufacturing, and transportation, including:

FDA Requirements: All manufacturing facilities must maintain: current FDA facility registration (renewed biennially); compliance with FSMA requirements where applicable, including written Food Safety Plans; and submission of facility registration numbers with renewal documentation.

TTB Requirements: Suppliers of alcohol-containing ingredients must: maintain all required TTB permits for production, storage, and transfer; retain documentation demonstrating compliance; and immediate notify MAB of any status changes.

Pure Food Guaranty: All suppliers must provide a current and legally valid Pure Food Guaranty, with annual renewal confirmation covering all materials supplied to Mark Anthony Brewing.

4.2. U.S. STATE AND LOCAL COMPLIANCE

4.2.1. MANUFACTURING FACILITY LICENSING

Suppliers must meet all state and local requirements relevant to their operations and product destinations.

State Requirements: All manufacturing locations must maintain: state manufacturing licenses appropriate to products manufactured; food handler licenses for relevant personnel; water system permits where applicable; waste discharge permits that meet environmental requirements; and business operation licenses that meet state and local requirements.

Local Health Department Compliance: Local health department requirements include: food or beverage production permits for manufacturing and processing operations; plan review approval for facility construction and modifications; routine inspection compliance with local health authority requirements; temporary permits for seasonal or limited-time operations; and potable water standards that meet or exceed EPA requirements with annual testing.

4.2.2. BEVERAGE-SPECIFIC STATE REQUIREMENTS

Alcoholic Ingredient Manufacturing: Suppliers must maintain: state licensing where required by regulations; special processing permits for acidified foods or thermal processing; organic certification compliance with state programs where applicable; and air quality permits where required for processing operations.

Regional Variations: Suppliers must comply with destination state requirements where products will be delivered, including but not limited to: California Proposition 65 compliance for potential chemical exposure warnings, New York Article 20-C compliance for food processing operations; and Texas Food Establishment Rules for food manufacturer licensing.

4.2.3. C-TPAT COMPLIANCE

Suppliers shipping directly to North America with Mark Anthony Brewing as importer of record must comply with C-TPAT security guidelines, including: high-security seals that meet ISO 17712 standards; documented security procedures; and supply chain security protocols. Container security must be maintained throughout transportation, with documented chain of custody and immediate notification of any security breaches.

4.3. REGULATORY INCIDENT MANAGEMENT

4.3.1. INSPECTION PROTOCOLS AND RESPONSE

Suppliers must maintain documented procedures for managing regulatory interactions and incidents.

Regulatory Contact Procedures: Suppliers must maintain documented procedures for regulatory authority interactions, including: responsible personnel identification for regulatory contacts; emergency contact procedures for after-hours visits; document access protocols that ensure required records are available within 4 hours; and employee training covering regulatory contact procedures and authorities.

Immediate Notification Requirements: Suppliers must notify the designated Mark Anthony Brewing contact for the following regulatory events: regulatory authority visits including FDA, USDA, TTB, state, or local inspections; regulatory sampling activities of ingredients or environmental surfaces; enforcement actions, including seizures or injunctions; Warning Letters or Form 483 observations; and Reportable Food Registry determinations or submissions. Notification timelines must follow Section 6.2.2 emergency communication requirements.

4.3.2. FORM 483 AND CORRECTIVE ACTION RESPONSE

Response Timeline: Suppliers receiving FDA Form 483 observations must provide MAB: immediate notification and complete documentation; preliminary assessment of observations and impact on supplied materials; immediate corrections for observations affecting current production; and written response within 15 business days addressing each observation with specific corrective actions.

Corrective Action Requirements: Suppliers must implement corrective actions with timelines, completion dates, and responsible personnel; progress updates during implementation; completion verification with supporting documentation; and effectiveness monitoring that demonstrates sustained correction. Root cause analysis must follow the requirements established in Section 6.2.4.

4.3.3. REPORTABLE FOOD REGISTRY COMPLIANCE

Determination Process: Suppliers must implement the following: reporting within 24 hours when a reasonable probability exists that beverage use will cause serious adverse health consequences; risk assessment framework for evaluating reportability; consultation with the designated Mark Anthony Brewing contact before reporting; documentation of reportability determinations; and coordination with affected customers and suppliers.

Reporting Procedures: Suppliers must ensure: electronic submission through the FDA Reportable Food Registry portal; inclusion of required information, including product description, problem nature, and affected quantity; compliance with follow-up obligations for additional information requests; simultaneous notification to affected customers; and sharing of all registry submission documents to MAB.

4.4. IMPORT REQUIREMENTS

4.4.1. IMPORTER OF RECORD DESIGNATION

Suppliers shipping directly to the United States with Mark Anthony Brewing as importer of record must ensure that all shipping documentation, customs declarations, and regulatory filings correctly identify Mark Anthony Brewing as the importer. Any changes to import arrangements require advance written notification and approval from Mark Anthony Brewing.

4.4.2. FOREIGN SUPPLIER VERIFICATION PROGRAM (FSVP) COMPLIANCE

Foreign suppliers must support Mark Anthony Brewing's FSVP compliance by providing the following required documentation: current FDA facility registration; hazard analysis specific to supplied ingredients; preventive controls documentation where applicable; and supplier verification records. Suppliers must also maintain compliance with applicable food safety regulations in the country of manufacture and provide corrective action documentation for any identified deficiencies.

4.4.3. CUSTOMS AND BORDER PROTECTION (CBP) COMPLIANCE

Suppliers must comply with CBP requirements and assist in gathering required documentation for customs clearance. This includes providing accurate commercial invoices, bills of lading, packing lists, certificates of origin, and any additional documentation requested by CBP or Mark Anthony Brewing to facilitate border clearance and compliance verification.

4.4.4. BORDER INSPECTION AND DETENTION

Suppliers must cooperate with FDA and CBP border inspections, including but not limited to: providing requested documentation; facilitating sample collection; and responding to inspection findings within specified timeframes. Suppliers must also provide immediate notification to Mark Anthony Brewing of any import detentions, refusals, or enforcement actions, along with comprehensive response documentation and corrective actions to address detention reasons and prevent recurrence.

4.4.5. ENHANCED IMPORT QUALITY REQUIREMENTS

Imported ingredients require the following enhanced quality measures: certificates of analysis with country-specific testing where required; enhanced testing requirements as specified in Section 7.1.1; and pesticide residue testing that meets EPA tolerance levels. Additionally, suppliers must provide complete supply chain traceability from raw material sources through export, with disclosure of all manufacturing and storage facilities in the supply chain and change notification for supply chain modifications.

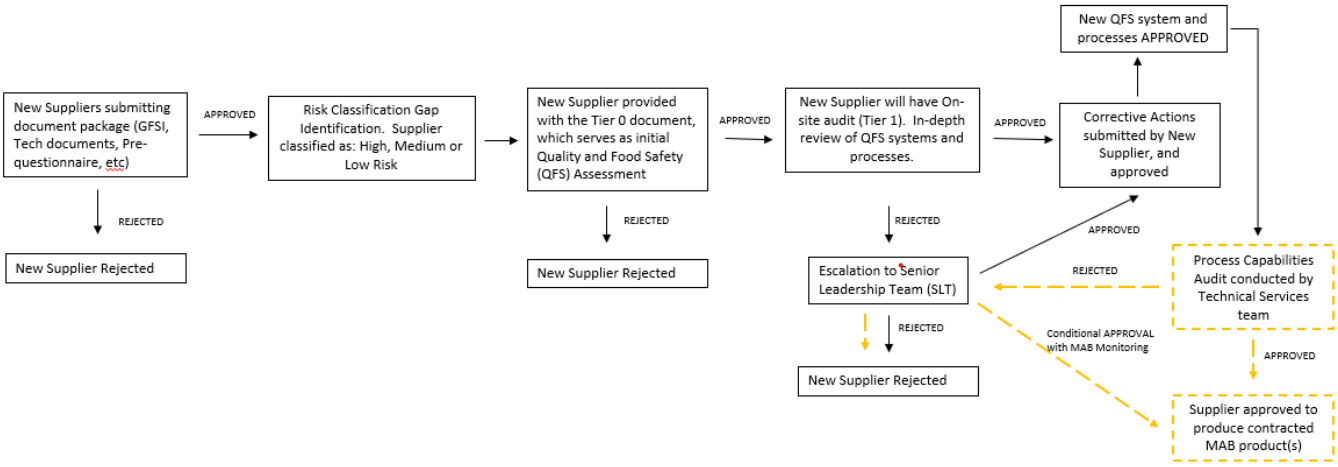
4.5. REGULATORY DOCUMENTATION REQUIREMENTS

Suppliers must maintain current documentation including facility registrations, Pure Food Guaranty, regulatory correspondence, and inspection records in accordance with Section 6.3.1 retention and accessibility requirements. All regulatory documentation must be updated within 30 days of any changes.

5. SUPPLIER APPROVAL AND PERFORMANCE

5.1. NEW SUPPLIER APPROVAL PROCESS

Mark Anthony Brewing follows a structured, risk-based four-phase approval process for all new suppliers and production locations:



5.1.1. FOUR-PHASE APPROVAL PROCESS

Phase 1: ***Documentation Review*** – New suppliers must submit complete documentation packages, including: pre-approval questionnaire covering company capabilities and certifications; regulatory documentation including FDA registrations and TTB permits where applicable; current GFSI certification with full audit report and corrective actions; quality system documentation including HACCP plans and internal audit reports; product specifications demonstrating ability to meet beverage ingredient requirements; laboratory capabilities with method validation and third-party qualifications; Allergen management programs; recall and withdrawal history (past 5 years); signed Non-Disclosure Agreements or Mutual Confidentiality Agreements; Safety Data Sheets, nutritional fact sheets, and technical data; palm oil and heavy metal testing statements; letters of Continuing Guarantee and California Transparency Act compliance; results of regulatory visits or enforcement actions; and insurance reports and consumer complaint records.

> **For Supply Chain Intermediaries:** Intermediaries must provide: complete upstream supplier disclosure with manufacturing facility identification; current compliance documentation for all upstream suppliers demonstrating adherence to applicable risk-based requirements; written confirmation that all upstream suppliers understand and agree to Mark Anthony Brewing audit rights detailed in Section 5.4 and access requirements; and supply chain mapping showing complete material flow from manufacturing source through intermediary to Mark Anthony Brewing.

Phase 2: ***Risk Assessment*** – This phase includes: document evaluation for completeness, currency, and compliance with requirements; risk classification assignment (High, Low) based on product type and operational complexity; gap identification requiring corrective action before proceeding; and preliminary approval determination with next steps identification.

> **For Supply Chain Intermediaries:** For intermediaries this phase includes: upstream supplier risk assessment based on materials sourced and supplied; verification of

upstream supplier compliance with applicable Mark Anthony Brewing requirements; identification of any upstream suppliers requiring direct Mark Anthony Brewing approval or qualification; and assessment of the intermediary's capability to manage and verify upstream supplier compliance on an ongoing basis.

Phase 3: ***On-Site Assessment*** – This phase involves: Audit requirement determination based on risk classification, with High-Risk suppliers requiring comprehensive on-site audits; Medium and Low-Risk suppliers potentially being approved through enhanced documentation review. Assessment scope covers food safety management systems, quality management systems, operational controls, and regulatory compliance verification.

Phase 4: ***Final Approval*** – This phase includes: comprehensive assessment report with findings and corrective action requirements; supplier corrective action plan development with timelines and responsible personnel; corrective action verification and effectiveness confirmation, and final approval decision with any ongoing conditions or monitoring requirements.

5.1.2. RISK-BASED APPROVAL STANDARDS

High-Risk Suppliers: These suppliers must meet the following requirements: GFSI certification, including BRC Global Standard for Food Safety, SQF Food Safety Code, FSSC 22000, or IFS Food Standard; comprehensive on-site audit; enhanced documentation review, including process validation and hazard analysis; annual audit requirements with ongoing monitoring; and enhanced change notification protocols with 6-month advance notice preferred.

Medium-Risk Suppliers: These suppliers must meet the following requirements: GFSI certification; basic quality management systems appropriate to operations; enhanced documentation review or abbreviated assessment; risk-based audit frequency typically every 2 – 3 years; and essential traceability and communication requirements with standard notification protocols.

Low-Risk Suppliers: These suppliers must meet the following requirements: Basic quality management systems appropriate to operations; enhanced documentation review or abbreviated assessment; risk-based audit frequency typically every 2 – 3 years; and essential traceability and communication requirements with standard notification protocols.

5.2. QUALITY PERFORMANCE STANDARDS AND MONITORING

5.2.1. QUALITY PERFORMANCE METRICS

Specification Compliance Standards: Suppliers must achieve the following performance levels: Target of 100% compliance with critical specification parameters; minimum acceptable level of 99.5% compliance with all specification parameters; action level of 97% compliance that triggers improvement plan requirement; and performance calculation through monthly tracking with rolling 12-month trend analysis.

Certificate of Analysis Performance: Suppliers must achieve: 100% on-time COA submission with delivery; zero tolerance for missing or inaccurate information; 100%

compliance with specified format requirements; and immediate correction required for any non-compliance, with escalation for repeated failures.

Quality Response Performance: Suppliers must achieve the following response standards: 98% acknowledgment within timeframes specified in Section 6.2.2; preliminary assessment and containment actions for critical issues within 24 hours; effective root cause analysis and corrective action plans in accordance with Section 6.2.4; on-time completion of all agreed corrective actions with verification of effectiveness; and demonstrated improvement in performance metrics following corrective action implementation.

5.2.2. DOCUMENTATION AND SPECIFICATION ACCURACY

Documentation Accuracy: Suppliers must achieve: 100% accuracy of shipping documentation and COAs; 100% compliance with packaging and labeling requirements including proper identification and traceability information; and 100% correct product delivered as ordered with zero tolerance for specification substitutions.

5.3. NON-COMPLIANCE MANAGEMENT AND ESCALATION

5.3.1. PERFORMANCE ESCALATION FRAMEWORK

Level 1 – Supplier Quality Contact: This level addresses: routine non-conformances and quality issues; standard corrective action requests and follow-up; monthly performance review discussions; specification clarifications and technical support; and normal business relationship management activities.

Level 2 – Supplier Management: This level addresses: repeated non-conformances indicating systemic issues; missed corrective action deadlines or ineffective responses; performance scores below acceptable levels for two consecutive quarters; resource allocation issues affecting improvement implementation; and business relationship concerns requiring management attention.

Level 3 – Senior Management: This level addresses: critical food safety or regulatory compliance failures; supplier approval status changes or potential termination as detailed in Section 5.3.3; contract modifications or business relationship restructuring; strategic supplier performance review and improvement planning; and executive-level relationship management for key suppliers.

5.3.2. SUPPLIER STATUS CLASSIFICATIONS AND ACTIONS

Approved Status: These suppliers demonstrate: full compliance with all critical requirements; minor findings successfully addressed through corrective action; demonstrated capability to consistently meet specifications; effective management systems with evidence of continuous improvement; and standard business relationship management with routine monitoring.

Approved with Conditions: These suppliers demonstrate: substantial compliance with ability to address identified deficiencies; the need for a corrective action plan with specific timeline and verification; increased monitoring and verification until conditions are resolved; limited

approval scope until full compliance is demonstrated; and enhanced oversight with more frequent performance reviews.

Probationary Status: Suppliers with this status are subject to: limited purchasing with enhanced monitoring and verification; monthly performance reviews with senior management involvement; conditional approval pending sustained improvement demonstration; alternative supplier approval initiation as contingency planning; and a final opportunity for relationship preservation.

- **Performance Improvement Plan (PIP):** Suppliers with this status require: formal notification of unacceptable performance with specific improvement requirements; weekly progress monitoring with milestone verification; management engagement and resource commitment verification; clear performance targets with objective measurement criteria; and a documented improvement plan with executive oversight.
- **Performance Improvement Plan Requirements:** Suppliers must submit a formal Performance Improvement Plan (PIP) when: (i) any performance metric falls below the minimum threshold for 2 consecutive months; (ii) 3 or more quality non-conformances occur within any rolling 6-month period; (iii) any critical non-conformance affecting product safety occurs; or (iv) other critical performance issues materially impact operations.
    - The PIP must include: root cause analysis in accordance with Section 6.2.4; specific corrective actions with responsible individuals identified; implementation timeline with weekly milestones; resource allocations and investments required; verification methodology to confirm effectiveness; and preventive measures to ensure non-recurrence. Suppliers must submit the PIP within 10 business days of notification. During implementation, suppliers must provide weekly progress updates. PIPs shall have a maximum implementation period of 90 days unless otherwise approved in writing by Mark Anthony Brewing.

Suspended Status: Suppliers with this status are under active investigation for critical non-conformance and are subject to: shipments temporarily halted pending resolution; enhanced oversight required for reinstatement; corrective action plan mandatory within 5 business days; and management-level engagement required for status review.

Delisted Status: Suppliers are given this status due to material breach, safety violations, and/or failure to complete PIP requirements and are subject to immediate cessation of all shipments. A formal supplier re-approval process is required for all future supply consideration.

5.3.3. TERMINATION CRITERIA AND PROCESS

Material Breach Termination: Mark Anthony Brewing may terminate supplier relationships if the supplier materially breaches this manual or applicable supply agreements and fails to cure the breach within thirty (30) days of receiving written notice detailing the issue. Material breaches include but are not limited to the following:

- Failure to meet quality or food safety performance standards for 3 consecutive months.
- Repeated failure to meet quality requirements or specifications.
- Material breach of food safety or quality regulations.

- Breach of any other material quality or safety provision of applicable agreements.

Immediate Termination: Mark Anthony Brewing may terminate supplier relationships immediately without a cure period for the following:

- Critical food safety violations posing immediate consumer health risk.
- Regulatory enforcement actions resulting in facility shutdown or product seizure.
- Fraudulent documentation or intentional misrepresentation.
- Refusal to implement required corrective actions for critical non-conformances.
- Loss of essential certifications with no acceptable restoration timeline.
- Fraud, intentional misconduct, or violations of applicable food safety regulations affecting supplied products.

Financial Obligations: Suppliers understand that material breaches may significantly impact Mark Anthony Brewing's business operations. Depending on the breach nature and supply agreement terms, suppliers may be liable for the following liquidated damages: accrued obligations prior to termination; recall costs and associated expenses; lost production costs due to supply disruption; premium costs for emergency alternative sourcing; quality investigation and testing costs; regulatory response and notification costs; customer complaint handling and resolution costs; potential lost sales from business disruption; additional freight and logistics costs; and other financial consequences as specified in individual contracts. Suppliers may also be liable for reasonable attorney fees and costs associated with enforcement of this manual or applicable supply agreements.

Post-Termination Obligations: Upon termination, suppliers must comply with the following: cooperate in good faith to ensure orderly transition of supply arrangements; fulfill accepted purchase orders unless terminated for the supplier's material breach; manage inventory according to contract terms; return or destroy confidential information within 30 days; and comply with all surviving obligations, including but not limited to: warranties, indemnification, and confidentiality requirements.

5.4. AUDIT RIGHTS AND PROCEDURES

5.4.1. AUDIT AUTHORITY AND SCOPE

Mark Anthony Brewing reserves the right to audit supplier facilities, records, documentation, processes, and personnel to verify compliance with this manual and applicable regulations. Audits may be conducted by Mark Anthony Brewing personnel, designated third-party auditors, or qualified representatives acting on behalf of Mark Anthony Brewing.

5.4.2. SUPPLIER INTERNAL AUDIT REQUIREMENTS

Internal Audit Program: Suppliers must establish comprehensive internal audit procedures with systematic coverage of each functional area at defined frequencies based on risk. All areas must be audited at a minimum of annually, with high-risk areas requiring more frequent assessment. Audits must be conducted by trained personnel who do not audit their own work areas. Audit procedures must include: documented procedures for audit conduct, evidence gathering, non-conformance identification, corrective action implementation, and effectiveness verification.

Supplier Internal Performance Metrics and KPIs: Suppliers must establish and monitor key performance indicators including but not limited to the following: specification compliance rates; non-conformance frequency and resolution effectiveness; audit performance and corrective action completion; Mark Anthony Brewing satisfaction and complaint resolution, training effectiveness and competency verification; regulatory compliance status; line and product specification compliance; internal and external audit results; recalls/retrievals; customer complaints; and supplier performance measures.

Data analysis requirements include but are not limited to: regular monitoring with established targets; trend analysis for improvement opportunities; management review of KPI performance; benchmark comparison against industry standards; and action planning for improvement initiatives based on data analysis.

5.4.3. AUDIT TYPES AND NOTIFICATION REQUIREMENTS

Routine Audits: Mark Anthony Brewing conducts routine audits as part of regular supplier management and approval maintenance. Audits may include documentation reviews, physical facility inspections, or combined approaches based on supplier risk classification and audit objectives. MAB will seek to provide suppliers with at least 15 business days' notice for facility inspections, 5 business days' notice for documentation reviews, and 15 business days' notice for combined audits.

For-Cause Audits: Mark Anthony Brewing may conduct expedited audits when prompted by the following circumstances: consumer safety concerns; regulatory inquiries or enforcement actions; suspected non-compliance with this manual; quality non-conformances affecting multiple batches; food safety incidents; loss of critical certifications; customer complaints indicating systemic issues; or supplier performance failures requiring immediate verification. MAB requires that suppliers facilitate For-Cause Audits with the following timelines: 48 hours' notice for urgent safety matters; 5 business days' notice for other issues; and immediate access without prior notice for emergency situations involving immediate safety risk. Audit format is determined based on the specific concerns prompting the investigation.

Process Capability Audits: Mark Anthony Brewing (MAB) reserves the right to conduct Process Capability Audits at any approved supplier at any time to verify that critical materials and ingredients consistently meet defined specifications and performance standards. These audits are a fundamental component of MAB’s technical governance program and are designed to confirm that suppliers maintain robust process controls, statistical capability (e.g., Cp/Cpk), and documented evidence of continuous improvement. The result of this audit will be an element of the approval status of the supplier. The Process capability audit results will be reported as an independent audit result.

5.4.4. AUDIT SCOPE AND ACCESS REQUIREMENTS

Suppliers must provide Mark Anthony Brewing and its designated representatives with complete access to the following: (i) all manufacturing, storage, and processing facilities; (ii) quality control and testing laboratories; (iii) all records, documentation, and quality

management systems; (iv) raw material and finished product storage areas; (v) personnel for interviews and competency verification; (vi) equipment, calibration records, and maintenance documentation; and (vii) supplier and sub-contractor facilities and records affecting supplied materials.

5.4.5. AUDIT FINDINGS AND CLASSIFICATION

Mark Anthony Brewing will seek to provide written findings within 15 business days of audit completion. Findings are classified as:

- **Critical Findings:** Issues posing immediate safety risk, major regulatory non-compliance, or fundamental system failures requiring immediate corrective action.
- **Major Findings:** Significant non-conformances with this manual, regulatory requirements, or certification standards that could impact product safety or quality.
- **Minor Findings:** Deviations from best practices or minor non-conformances that do not immediately impact safety or quality but require corrective action.

5.4.6. CORRECTIVE ACTION REQUIREMENTS AND TIMEFRAMES

Critical Findings: The supplier must provide immediate containment actions within 24 hours; preliminary corrective action plan within 48 hours; and complete corrective action plan with root cause analysis within 5 business days.

Major Findings: Suppliers must acknowledge findings within 24 hours; and provide a complete corrective action plan within 15 business days.

Minor Findings: The supplier must provide a corrective action plan within 20 business days.

All corrective action plans and root cause analysis must comply with the standards established in Section 6.2.4.

5.4.7. FOLLOW-UP AND VERIFICATION

Mark Anthony Brewing may conduct follow-up audits to verify the implementation and effectiveness of corrective actions. Suppliers must provide documented evidence of both corrective action completion and effectiveness verification. Failure to satisfactorily address all audit findings within specified timeframes may result in supplier status changes or termination as detailed in Section 5.3.

5.4.8 PROCESS CAPABILITY AND STABILITY REQUIREMENTS

Suppliers must demonstrate that their manufacturing processes are statistically capable and stable for all critical-to-quality (CTQ) parameters.
The following requirements apply:

Identification of CTQ Parameters

- Define all critical parameters that impact product safety, quality, and regulatory compliance.
- Include rationale for CTQ selection and linkage to product specifications.

Process Capability Analysis

- Provide documented **Cp and Cpk values** for each CTQ parameter:

- **Minimum Cpk requirement:**
  - ≥ 1.33 for normal operations
  - ≥ 1.67 for high-risk or regulatory-critical attributes
- Include calculation methodology and data source (e.g., 30 consecutive production runs or equivalent sample size).

Ongoing Statistical Process Control (SPC)

- Maintain control charts (X-bar/R or I-MR charts) for CTQ parameters.
- Demonstrate process stability (no special cause variation) over a rolling 12-month period.
- Submit SPC summaries quarterly or upon request.

Validation and Verification

- Initial validation: Provide baseline capability study during qualification.
- Continuous verification: Annual re-validation or after any significant process change.

Corrective Action for Low Capability

- If Cpk < 1.33 for any CTQ parameter:
  - Submit a **Process Improvement Plan** detailing root cause analysis, corrective actions, and timeline to achieve compliance.
  - Enhanced monitoring until capability meets requirements.

Data Submission and Transparency

- Provide raw data sets for capability studies.
- Submit summary reports with trend analysis.
- Evidence of calibration and maintenance for measurement systems (MSA studies recommended).

6. DOCUMENTATION AND COMMUNICATION

6.1. DOCUMENTATION AND REPORTING REQUIREMENTS

Suppliers must maintain comprehensive documentation systems that support traceability, regulatory compliance, and audit readiness.

6.1.1. MANDATORY COA DOCUMENTATION

All ingredient suppliers must provide lot-specific Certificates of Analysis for each delivery as specified in material specifications. COAs must be submitted electronically at the time of dispatch and provided in hard copy with delivery, formatted according to specified layout requirements. When ingredient shelf life allows, COAs should be provided in advance of delivery.

6.1.2. REQUIRED COA INFORMATION

Product Identification: COAs must include the following product identification details: material name exactly matching purchase order specifications; supplier material code and Mark Anthony Brewing material code; manufacturing lot/batch code for complete traceability;

quantity supplied with appropriate units of measure; date of manufacture and best before/expiration date; and country of origin for primary raw materials.

Analysis Results: COAs must include the following analysis information: all critical properties identified in agreed specifications; test methods used with current revision numbers; actual test results for each specification parameter with conformance statements (Pass/Fail); validated storage conditions, including specific temperature and humidity ranges, with documented stability data supporting storage requirements; and allergen declarations with relevant certification symbols (kosher, organic, etc.).

Authorization: COAs must include the following authorization details: COA approval signature and date by an authorized quality representative; electronic signatures when validated; name and title of the approving individual; and date of certificate issuance with laboratory requirements as detailed in Section 7.3.

6.2. COMMUNICATION PROTOCOLS

6.2.1. PRIMARY COMMUNICATION METHODS

Email Communication Standards: All routine supplier communication must meet the following standards: conducted via email with designated primary contacts for quality, regulatory, and commercial matters; response acknowledgment required within specified timeframes; email formatting with clear subject lines and reference numbers; and document attachment standards for certificates, reports, and notifications.

Contact Information Requirements: Suppliers must maintain the following contacts: a primary quality contact for COAs, specifications, and quality issues; a regulatory contact for compliance matters; an emergency contact with 24/7 availability for urgent food safety issues; and a management contact for escalated issues and approvals. Current contact information must be maintained throughout the supply relationship.

External Incident Monitoring: Suppliers must stay current with industry developments affecting food safety, quality, and fraud, including: monitoring trade publications; tracking regulatory alerts; and investigating industry intelligence that could impact supplied materials.

6.2.2. RESPONSE TIME REQUIREMENTS AND NOTIFICATION PROCEDURES

All supplier responses must follow these mandatory timeframes with corresponding investigation and corrective action requirements:

Emergency Situations (product safety, recalls, regulatory actions): Suppliers must provide: Immediate phone contact with a live person followed by email documentation within 2 hours, followed by compliance with critical issue timeline requirements.

Critical Issues (immediate safety or compliance risk): Suppliers must provide: a phone call with live person within 4 hours AND email confirmation; immediate containment actions within 24 hours; preliminary assessment within 24 hours; detailed investigation with root cause analysis completed within 7 days; corrective action plan within 14 days with implementation timeline; and effectiveness verification within 30 days of implementation.

Major Issues (significant non-compliance): Suppliers must provide: email acknowledgment within 24 hours; detailed response with corrective action plan within 5 business days; investigation with root cause analysis within 14 days; corrective action plan within 30 days with implementation schedule; bi-weekly progress updates until completion; and verification within 90 days.

Minor Issues (routine quality matters): Suppliers must provide: Email acknowledgment within 5 business days; detailed response plan within 14 days; implementation within 60 days; and correction evidence within 90 days.

Routine Matters: Suppliers must provide: Email acknowledgment within 2 business days.

Escalation Protocol: Suppliers must continue escalation through the management hierarchy until live contact is achieved for critical or emergency issues.

Root cause analysis requirements are detailed in Section 6.2.4.

6.2.3. PROACTIVE COMMUNICATION REQUIREMENTS

Change and Industry Intelligence: Suppliers must proactively communicate: regulatory changes impacting product specifications; market developments affecting supplied materials; supply chain vulnerabilities or risk factors; advance warning of potential supply disruptions; and disclosure of sub-tier suppliers and manufacturing locations with notification of any supply chain modifications.

Best Practices Sharing: Suppliers should provide: documentation and communication of successful improvement methodologies; lessons learned from the implementation of corrective actions or process improvements; industry best practices adopted that could benefit other operations; and recognition of successful improvement contributions through formal acknowledgment programs.

6.2.4. ROOT CAUSE ANALYSIS STANDARDS

Requirements: Root cause analysis is required for: all major and critical issues; trends showing increased non-conformances; safety-related issues; regulatory findings; customer complaints affecting safety, certification suspensions; significant rejections; and repeated rejection issues. The analysis must include the following elements: systematic investigation using appropriate methodologies including 5-Why Analysis, Fishbone/Ishikawa Diagram, or Failure Mode and Effects Analysis; root cause identification that distinguishes symptoms from underlying causes; impact assessment on products and processes; corrective actions addressing identified root causes; preventive measures to avoid recurrence; and verification plans that confirm action effectiveness.

Personnel and Timeline Requirements: All analyses must be conducted by qualified personnel with appropriate training in analytical methodologies. Timeline requirements vary by situation: for audit findings, analysis timelines must follow Section 5.4.6 requirements; for non-conformances, analysis must follow Section 6.2.2 timeline requirements; and for rejections, analysis must be submitted within 15 business days in accordance with Section 6.4.4 requirements.

6.3. DOCUMENT CONTROL AND RECORD MANAGEMENT

6.3.1. DOCUMENT MANAGEMENT AND RETENTION STANDARDS

Suppliers must maintain comprehensive document control systems that ensure: current versions are used throughout operations with version control clearly identifying current revisions; distribution control that ensures obsolete documents are removed; access control that restricts sensitive documents to authorized personnel; update procedures that ensure changes are communicated and implemented; and backup systems that protect against document loss.

Retention Standards: Suppliers must retain documents according to the following schedule: production and quality records (manufacturing records, COAs, test results) for product shelf life plus 2 years (minimum of 3 years); HACCP and CCP monitoring records for product shelf life plus 2 years (minimum of 3 years); training documentation for the employment period plus 3 years; corrective action records for 5 years from completion; audit reports and certifications for 5 years from expiration; facility registrations for 5 years from expiration; regulatory correspondence for 5 years from resolution; and inspection reports for 7 years from the inspection date.

Storage Requirements: Document storage must include: a secure environment protecting against unauthorized access and damage; climate control appropriate to document type; organization that enables rapid retrieval during audits (within 4 hours for critical records); and backup systems for electronic records with off-site storage.

6.4. PRODUCT INSPECTION, REJECTION, AND DISPOSITION PROCEDURES

6.4.1. INSPECTION PERIOD AND RIGHTS

Inspection Period Definition: The "***Inspection Period***" means 30 days from completion of product unloading and Mark Anthony Brewing's or the Co-Packer's signed receipt, during which Mark Anthony Brewing or the Co-Packer may inspect and reject products for the following reasons: non-conformance; quality defects; documentation deficiencies; packaging damage apparent upon reasonable inspection; or failure to meet specifications.

Grounds for Rejection: Mark Anthony Brewing or the Co-Packer may reject products during the Inspection Period for reasons including but not limited to: quality issues affecting product safety or performance; non-conformance with agreed specifications; damaged packaging that compromises product integrity; failure to include a complete documentation package with lot-specific Certificates of Analysis, shipping documentation, and all required regulatory documentation; failure to meet regulatory requirements; contamination or adulteration concerns; improper labeling or identification; and deviation from approved formulations or processing methods.

Acceptance and Warranty Preservation: Products not rejected within the Inspection Period are deemed accepted for apparent issues discovered through reasonable inspection. However, acceptance does not waive the Supplier's warranties, indemnification obligations, or responsibility for latent defects discovered after the Inspection Period.

6.4.2. REJECTION NOTIFICATION AND RESPONSE

Supplier Response Timeline: Upon receiving rejection notice, suppliers must provide: acknowledgement of rejection notice to MAB within 24 hours via email confirmation; a preliminary assessment of the rejection cause and immediate containment actions taken; an initial corrective action response addressing immediate concerns; and confirmation of understanding of replacement or disposal requirements.

6.4.3. REJECTION MATERIAL MANAGEMENT

Supplier Retrieval Obligations: Within 3 business days of rejection notice, the supplier must retrieve rejected materials at the supplier's expense and collaborate with MAB or the Co-Packer to determine disposition through one of the following options: replace rejected materials with conforming product at the supplier's cost; dispose of rejected materials at the supplier's cost using appropriate disposal methods; or authorize Mark Anthony Brewing or the Co-Packer to dispose of rejected materials at the supplier's cost with documented disposal procedures.

Replacement Requirements: If the supplier chooses to replace rejected materials, conforming replacement materials must meet the following requirements: be delivered and unloaded at the Mark Anthony Brewing or the Co-Packer location within 5 calendar days of the initial rejection incident; meet all original specifications and quality requirements; include complete documentation package as specified in Section 6.1; and undergo Mark Anthony Brewing inspection to confirm conformance before acceptance.

Financial Responsibilities: The supplier must fulfill the following financial obligations: issue a credit for all rejected materials within 10 calendar days of the initial rejection incident; bear all costs associated with the rejection including retrieval, disposal, replacement, and associated logistics expenses; compensate Mark Anthony Brewing for any additional costs incurred due to production disruptions caused by rejected materials; and provide documentation of all credits and cost reimbursements.

6.4.4. SIGNIFICANT OR REPEAT REJECTION ANALYSIS

Analysis Requirements: For significant rejections or repeated rejection issues, the supplier must submit a comprehensive root cause analysis and corrective action plan within 15 business days of the rejection notice in accordance with Section 6.2.4.

Escalation for Repeated Rejections: The following rejection patterns may trigger escalation under the Performance Improvement Process in Section 5.3.2 and potential supplier status changes: multiple rejections within any rolling 6-month period; rejections for the same non-conformance issue; or rejections indicating systemic quality problems.

6.4.5. SPECIAL REJECTION CATEGORIES

Food Safety Rejections: Products rejected for food safety concerns require: immediate containment; expedited root cause analysis within 72 hours in accordance with Section 6.2.4; regulatory notification assessment and reporting as required; enhanced verification of corrective actions before resuming shipments; and potential facility inspection before approval restoration.

Documentation Rejections: Products rejected solely for documentation deficiencies may be held pending correction if the product itself meets specifications. Corrected documentation must be provided within 24 hours, and repeated documentation failures may result in product rejection regardless of product conformance.

Regulatory Compliance Rejections: Products rejected for regulatory non-compliance require the following: legal compliance verification before replacement; regulatory authority notification if required; comprehensive documentation demonstrating compliance restoration; and potential regulatory inspection coordination.

6.5. CUSTOMER COMPLAINT AND FEEDBACK MANAGEMENT

Suppliers must maintain effective processes for customer feedback, quality notifications, and non-conformance reports. Procedures must include systematic documentation; root cause analysis in accordance with Section 6.2.4; and timely responses in accordance with Section 6.2.2. Regular trend analysis is required for continuous improvement.

7. OPERATIONAL REQUIREMENTS

7.1. OPERATIONAL CONTROLS BY SUPPLIER CATEGORY

Operational expectations vary by supplier type. Each category must meet specific controls aligned with the nature of their materials or services.

7.1.1. DIRECT INGREDIENT SUPPLIERS

Beverage-Specific Process Controls: Suppliers must implement the following enhanced controls: Enhanced microbiological monitoring beyond Section 3.1 HACCP requirements with pathogen testing appropriate to ingredient risk profile; thermal processing validation for pasteurized ingredients in accordance with Section 3.7 requirements; analytical testing for Brix/pH/acidity compliance; alcohol content verification using validated methods; and flavor stability testing with shelf-life validation studies.

Process Validation and Critical Controls: Suppliers must maintain: validated critical control points specific to beverage ingredient applications with scientific justification and supporting validation studies; process capability studies demonstrating consistent achievement of beverage-specific parameters; and specialized equipment validation for ingredient properties including viscosity, density, and potential interference factors with Mark Anthony Brewing processing equipment.

Ingredient-Specific Quality Controls: Suppliers must implement the following quality controls: water quality management in accordance with Section 3.4.1 where ingredients contact water; specialized sampling and testing protocols for liquid ingredients including sterility verification where applicable; and shelf-life validation studies specific to beverage applications with accelerated aging studies where appropriate.

Powdered Ingredient Quality and Flow Characteristics: Suppliers of powdered ingredients must implement comprehensive clumping prevention and flow programs that include: moisture content testing with documented limits and validated storage conditions; particle size

distribution analysis that ensures consistent flow properties; flow characteristic testing for angle of repose, bulk density, and flowability index; anti-caking agent validation with effectiveness studies where used; and packaging integrity testing that ensures moisture barriers prevent clumping.

Storage procedures must include environmental controls in accordance with Section 3.3.2; validated moisture barrier packaging with desiccants where required; and incoming material testing for moisture and flow characteristics. Quality release requires batch clumping testing using standardized methods with acceptance criteria and storage validation that demonstrate maintained flow characteristics throughout shelf life.

Ingredient Packaging Requirements: All ingredient packaging must meet these basic requirements: use food-grade materials with FDA compliance documentation and food contact certificates where applicable; and be validated for ingredient compatibility, including chemical resistance, moisture barriers, and absence of flavor or odor transfer.

Packaging Type-Specific Requirements include: Flexible packaging must maintain seal integrity with documented strength and puncture resistance testing; rigid containers must demonstrate structural integrity through compression and drop testing; liquid ingredients require leak-proof containers with integrity testing and vacuum prevention systems; and moisture-sensitive ingredients require validated moisture barrier packaging with permeability testing and desiccants as needed. Multi-use containers must meet additional requirements: cleaning validation in accordance with Section 3.3.4; usage history tracking; and periodic integrity testing to ensure continued food contact suitability.

All ingredients packaging must include specialized labeling with the following information: packaging material composition for multi-use containers; storage orientation requirements for supersacks and flexible packaging; and handling equipment specifications for bulk containers. Hazard communication labeling must provide the following: ingredient-specific handling precautions; emergency contact information for spill or exposure incidents; and DOT-required transportation classification where applicable. Multi-use container labeling must additionally include: declaration of previous contents; indication of cleaning verification status; and display of inspection dates with clear identification of food-grade certification status.

7.1.2. CONTRACT MANUFACTURERS

Co-Manufacturing Process Controls: Contract manufacturers must implement the following process controls: complete process validation for all MAB formulations with documented critical control points in accordance with Section 3.1 HACCP requirements specific to contracted products; cleaning procedures between different customer products in accordance with Section 3.3.4; production scheduling systems that prevent cross-contamination between customers with documented changeover procedures; environmental monitoring programs with pathogen testing appropriate to finished beverage product risk; and calibration of all critical monitoring equipment in accordance with Section 7.4.

Ingredient Handling and Control: Contract manufacturers must implement the following ingredient management controls: incoming ingredient inspection and verification procedures in accordance with Section 7.1.1 requirements that confirm identity, quality, and specification compliance; segregated ingredient storage systems that prevent cross-contamination between

different customer formulations with physical barriers and clear identification; environmental controls for ingredient storage in accordance with Section 3.4.3; ingredient inventory management with first-in-first-out rotation and expiration date monitoring; documented ingredient handling procedures that prevent contamination and maintain ingredient integrity during transfer and processing operations; and ingredient traceability systems that link received ingredients to specific production batches and finished products.

Recipe and Formulation Security: Contract manufacturers must maintain the following security measures: signed confidentiality agreements with key personnel handling proprietary Mark Anthony Brewing formulations; secure storage and handling procedures for proprietary ingredients and formulations with access control systems; ingredient segregation procedures that prevent cross-contamination between proprietary Mark Anthony Brewing ingredients and other customer materials; documented procedures that prevent unauthorized disclosure or use of proprietary information; segregated production areas or validated cleaning procedures when handling multiple customer formulations; and personnel training on confidentiality requirements with documented competency verification in accordance with Section 2.6.4.

Packaging Material Control and Validation: Contract manufacturers must maintain the following packaging controls: approved supplier lists for all packaging materials, including primary packaging (cans, bottles, closures) and secondary packaging (cases, labels), with documented approved procedures that meet Mark Anthony Brewing requirements; material compliance verification that ensures packaging materials meet Mark Anthony Brewing specifications and food contact requirements; and advance notification procedures that require 90-day notice for packaging supplier changes with Mark Anthony Brewing approval required.

Finished Product Release and Customer Notification: Contract manufacturers must implement the following release and notification procedures: Batch release procedures that require documented approval by qualified quality personnel before shipment with verification of Mark Anthony Brewing specification compliance; product hold and disposition procedures for non-conforming finished products with immediate customer notification; and customer notification procedures in accordance with Section 6.2.2.

7.1.3. PRIMARY PACKAGING SUPPLIERS

Food Contact Safety and Compliance: Primary packaging suppliers must maintain the following compliance measures: Current FDA compliance documentation for all food contact surfaces with migration and leachability testing for beverage applications; material safety testing, including heavy metals, chemical migration, and contaminant analysis using validated methods appropriate to beverage contact applications; and regulatory compliance monitoring with immediate notification of changes affecting food contact status.

Product-Specific Manufacturing Controls: Primary packaging suppliers must implement the following material-specific controls: Glass bottle manufacturing requires thermal shock and pressure resistance testing with documented annealing process validation; incoming raw material controls for glass composition and quality; and breakage prevention procedures in accordance with Section 3.3.2 throughout manufacturing and handling operations. PET suppliers must maintain food-grade certification with documented compliance with FDA regulations; blow molding specification compliance with validated processing parameters; and material property testing that ensures compatibility with beverage applications. Can suppliers

require pressure resistance testing for carbonated beverage applications with documented validation studies; coating integrity testing for interior can coatings; and corrosion resistance verification appropriate to product contact requirements.

Mark Anthony Brewing Equipment Compatibility: Primary packaging suppliers must ensure the following compatibility requirements: dimensional and functional testing that ensures packaging compatibility with Mark Anthony Brewing processing equipment; seal integrity testing for closures and containers with documented performance criteria specific to beverage applications; and metal detection system compatibility verification with Mark Anthony Brewing processing equipment, including sensitivity validation for specific packaging materials.

Packaging Integrity and Performance: Primary packaging suppliers must demonstrate the following performance standards: process capability studies that demonstrate consistent achievement of specification requirements; validation of packaging performance under beverage-specific conditions, including carbonation pressure and temperature variations; and specialized testing protocols for packaging interaction with beverage ingredients, including flavor scalping and barrier properties.

7.1.4. SECONDARY PACKAGING SUPPLIERS

Manufacturing Standards and Process Controls: Secondary packaging suppliers must implement the following manufacturing standards: structural integrity testing through compression, drop, and vibration testing with documented performance criteria specific to beverage product applications; dimensional accuracy verification that ensures compatibility with Mark Anthony Brewing automation equipment; and process validation that demonstrates consistent achievement of packaging specifications with statistical process control where applicable.

Beverage Industry Packaging Requirements: Secondary packaging suppliers must meet the following industry requirements: sustainable packaging compliance where specified in supply agreements with documented verification of recycled content and environmental certifications; specialized testing for beverage case and label applications including moisture resistance and adhesion performance; and compatibility verification with beverage production line speeds and handling requirements.

Quality Controls and Contamination Prevention: Secondary packaging suppliers must maintain quality controls in accordance with Section 2 requirements and the following quality controls: contamination prevention during production in accordance with Section 3.3.3 sanitation requirements and specialized foreign object prevention programs for packaging materials; incoming raw material controls with supplier approval procedures for substrates and printing materials specific to beverage labeling requirements; and corrective action procedures for non-conforming packaging in accordance with Section 6.2.4.

7.1.5. SUPPLY CHAIN INTERMEDIARIES

Upstream Manufacturing Supplier Disclosure and Approval: Supply Chain Intermediaries must provide complete disclosure of all manufacturing suppliers for materials supplied to MAB as detailed in Section 5.1.1 approval requirements, including but not limited to: manufacturing

facility names and addresses; FDA registration numbers; and detailed scope of manufacturing operations. All upstream manufacturing suppliers must receive individual risk classification (High-Risk, Medium-Risk, and Low-Risk based on Section 1.3.2) and formal written approval from MAB before the intermediary can be approved to supply those materials. Changes to upstream manufacturing suppliers require advance notification in accordance with Section 1.5 Change Control and Management procedures, and written Mark Anthony Brewing approval before implementation.

Manufacturing Supplier Compliance Requirements: Supply Chain Intermediaries must verify and document that their upstream manufacturing suppliers comply with all applicable MAB requirements, as established during the approval process detailed in Section 5.1.1, corresponding to their individual risk classifications. High-Risk manufacturing suppliers must maintain current GFSI certification and annual audit compliance. Medium-Risk and Low-Risk manufacturing suppliers must maintain basic quality management systems appropriate to their operations. Intermediaries must obtain and maintain current compliance documentation from all manufacturing suppliers.

Product Quality Responsibility and Integrity: Supply Chain Intermediaries are fully responsible for the quality of all materials supplied to MAB, including ownership of rejections and non-conformances regardless of upstream manufacturing supplier root causes. Intermediaries must maintain complete accountability for corrective actions, replacement costs, and performance metrics with their own suppliers.

Intermediaries are prohibited from the following activities: shipping products previously rejected by any customer; short-dated products purchased from other customers; or any blending of rejected or short-dated materials with conforming products. All supplied materials must meet shelf life specifications at delivery, and intermediaries cannot ship products approaching expiration or blend expired or near-expired materials with fresh products. Intermediaries must maintain complete traceability of product age, disposition history, and blending activities, with immediate disclosure of any materials subject to hold, rejection, or quality investigation by any customer.

Verification and Oversight: Supply Chain Intermediaries must implement the following verification and oversight procedures: documented verification procedures that confirm upstream manufacturing suppliers' ongoing compliance with applicable requirements; facilitation of MAB audit access to actual manufacturing locations as confirmed during the approval process per Section 5.1.1, including coordination with manufacturing suppliers for audit scheduling; and maintenance of current manufacturing supplier approval documentation that demonstrates continued compliance with risk-based requirements.

Document Control and Traceability: Supply Chain Intermediaries must ensure: certificates of analysis originate from actual manufacturing facilities and are transmitted without alteration, with intermediary verification of accuracy; manufacturing facility identification is clearly documented on all shipping documentation in accordance with Section 6.1; and compliance with traceability requirements in accordance with Section 7.2.1. All document control procedures must follow Section 6.3.1 requirements with additional intermediary-specific requirements.

Intermediary Operational Requirements: Supply Chain Intermediaries must maintain the following operational standards: quality management systems in accordance with Section 2, appropriate to intermediary operations and the risk classification of materials handled; applicable warehouse and transportation standards in accordance with Sections 7.1.6 and 7.2; and document control systems that ensure accurate transmission of manufacturing supplier documentation.

7.1.6. RAW MATERIAL WAREHOUSES

Storage Environmental Controls: Raw material warehouses must maintain environmental controls in accordance with Section 3.3.2, with additional segregation systems and specialized storage conditions for ingredient-specific requirements.

Specialized Storage Requirements: Raw material warehouses must provide the following specialized storage capabilities: ingredient-specific storage conditions, including controlled atmosphere storage where required; specialized handling procedures for temperature-sensitive materials with validated cold chain management; and compatibility assessment for co-storage of different material types with documented risk assessment and approval procedures.

Inventory Management and Material Integrity: Raw material warehouses must implement the following inventory management procedures: First-in-first-out inventory rotation procedures with documented verification and exception reporting; expiration date monitoring with automated alerts and disposition procedures for expired materials; damage assessment procedures with immediate segregation and disposition of compromised materials; and capacity management that ensures adequate storage space and proper stacking procedures that prevent damage to packaging and materials.

Emergency Response and Business Continuity: Raw material warehouses must maintain emergency and continuity procedures including: emergency procedures for equipment malfunctions, including backup power systems and alternative storage arrangements; security incident response, including theft prevention and investigation procedures; customer notification protocols in accordance with Section 6.2.2, and business continuity planning that ensures uninterrupted service during operational disruptions.

7.2. SUPPLY CHAIN AND LOGISTICS

7.2.1. TRACEABILITY AND MOCK RECALL SYSTEMS

Traceability Requirements: All suppliers must maintain the following traceability capabilities: one-up, one-down traceability with complete supplier information including manufacturing locations and lot numbers; internal process tracking that links raw materials to finished products with equipment identification; distribution records with customer delivery documentation; and annual mock recall testing that demonstrates 100% material reconciliation within 24 hours. Multi-use packaging containers require enhanced traceability documentation, including the following: complete usage history; cleaning and sanitization records; and previous contents identification to ensure appropriate risk assessment and contamination prevention throughout the container lifecycle.

Mock Recall Performance Standards: Mock recall exercises must meet the following performance standards: exercise scope that includes all critical materials with both forward and backward tracing; 24-hour completion timeframe with documented elapsed time; complete material balance documentation that shows received, stored, used, and produced quantities; management review with improvement recommendations; and retest requirements for failed exercises within 60 days.

7.2.2. TRANSPORTATION STANDARDS

Vehicle and Container Requirements: Transportation vehicles must meet the following requirements: comply with FDA, DOT, and applicable regulations; maintain food-grade designation; maintain clean and odor-free condition; maintain leak-proof integrity; and maintain structural safety. Suppliers must inspect vehicle openings, security seals, and interior components with documented verification prior to loading.

Security and Documentation: All loaded vehicles must be immediately sealed with tamper-evident seals, using cable seals for bulk rail and truck carriers. Bills of Lading must include: seal numbers; vehicle/carrier information; complete load description with lot identification; quantities; purchase order numbers; temperature requirements; emergency contacts; Mark Anthony Brewing DUNS number for US imports; and additional documentation in accordance with Section 4.4 for imported ingredients. Missing or inaccurate information may result in load rejection.

Bulk Transportation: Bulk transportation must meet the following requirements: bulk containers require enhanced cleaning with filtered air purging for a minimum five minutes after washing; wash certificates are required for all loads unless using dedicated vehicles for single-product service; rail cars require comprehensive documentation 24 hours prior to arrival, including car number, previous contents (or dedicated service confirmation), wash certificate or dedicated vehicle certification, and estimated arrival time; cable seals are mandatory for all bulk carriers; and drivers require documented training on product handling and contamination prevention in accordance with Section 2.6.2.

Dedicated Bulk Equipment: Bulk containers in dedicated service to specific products may utilize modified wash schedules based on product compatibility and risk assessment. Suppliers must maintain documentation that demonstrates dedicated service status, periodic deep cleaning schedules, and equipment condition monitoring. Any deviation from dedicated service requires a return to standard wash requirements before resuming dedicated status.

Transload Stations: Suppliers utilizing transload stations (also commonly referred to as “break stations”) must qualify these locations by ensuring: FSMA Sanitary Transportation compliance; current facility registrations; and comprehensive food safety programs. Required controls include: foreign material detection at terminal loading points; equipment cleaning programs; calibrated measurement systems; complete load traceability; and cross-contamination prevention protocols with segregation of different ingredient types and validated cleaning procedures. A supplier's use of any transload station(s) must be explicitly disclosed to MAB.

Specialized Load Requirements:

- Less than full Truckload (LTL) shipments require unitized tamper-evident packaging, specific pallet identification, and appropriate dunnage materials that comply with DOT load securement regulations.
- Glass bottle shipments require enhanced protection, including cushioning materials, vibration dampening, and proper construction and wrapping to prevent shifting, with immediate notification of any damage affecting product safety.
- All shipments must utilize clean, food-grade dunnage where applicable with documented certification.

7.2.3. CHAIN OF CUSTODY AND MONITORING

Suppliers must maintain documented chain of custody from loading through delivery, including: load verification at origin with driver acknowledgment; in-transit monitoring for temperature-controlled shipments; and delivery confirmation with a receiving signature. Any routing deviations, delays, or temperature excursions require immediate MAB notification with product impact assessment and disposition determination.

7.2.4. PALLET QUALITY AND SPECIFICATIONS

Pallet Standards and Specifications: All pallets must meet GMA standard 48" x 40" dimensions unless otherwise specified in applicable supply agreements. Wood pallets must meet the following requirements: be heat-treated; meet ISPM-15 standards for international shipments; and maintain maximum moisture content of 19% to prevent mold and product damage. Non-wood pallets (plastic, metal, composite) must meet equivalent structural and safety standards.

Quality Requirements: All pallets must meet the following quality standards: arrive in clean, dry condition free from contamination foreign odors, and previous load residue; maintain structural integrity with no broken, loose, or protruding boards, nails, hardware, or damaged components; be free from pest damage, staining, or chemical contamination; have consistent construction that enables stable product stacking and transport; and maintain a minimum of 2,500 lbs. dynamic load capacity.

Documentation Requirements: Documentation requirements vary by pallet type and include: for wood pallets: clearly visible ISPM-15 marking where applicable and date of treatment documentation; for all pallets: require supplier identification for traceability and certificates of compliance for food-grade applications where specified. Pallet tags must meet the following requirements: be securely attached and clearly legible; and contain accurate shipment information, including product identification, lot numbers, quantities, supplier information, purchase order numbers, and any special handling instructions as specified in purchase orders or supply agreements.

Supplier Responsibilities: Suppliers must fulfill the following responsibilities: inspect pallets before shipment to ensure quality standards are met; replace damaged or non-conforming pallets at their own expense; maintain pallet supplier approval and audit records; and provide advance notification of any pallet supplier changes. Individual supply agreements may contain additional pallet requirements, specifications, or pallet program definitions that supersede these general requirements, and suppliers must comply with the most stringent applicable standards.

7.3. LABORATORY AND TESTING

7.3.1. TESTING REQUIREMENTS BY CATEGORY

High-Risk Suppliers: High-Risk suppliers must meet the following laboratory requirements: ISO 17025 accreditation for food safety testing with scope covering required analyses; pathogen testing for high-risk ingredients using validated methods; chemical analysis, including heavy metals, pesticides, and contaminants where applicable; allergen verification and cross-contact prevention testing; and retention sampling for product shelf life plus appropriate extension.

Medium-Risk Suppliers: Medium-Risk suppliers must meet the following testing requirements: Basic quality testing for specification compliance, third-party laboratory arrangements where individual testing is cost-prohibitive; reduced testing frequency based on risk assessment and performance history; and certificate of compliance documentation for materials not requiring extensive testing.

Low-Risk Suppliers: Low-Risk suppliers must meet the following testing requirements: Basic quality testing for specification compliance, third-party laboratory arrangements where individual testing is cost-prohibitive; reduced testing frequency based on risk assessment and performance history; and certificate of compliance documentation for materials not requiring extensive testing.

7.3.2. LABORATORY MANAGEMENT STANDARDS

Good Laboratory Practices: Internal laboratories must implement documented GLP that include: proper microbiological hazard containment; elimination of cross-contamination to production areas; and access limited to authorized personnel. Laboratories must not open directly to production floors and must require autoclave or equivalent sterilization for hazardous waste disposal.

Quality Control and Accreditation: ISO 17025 accreditation is preferred for food safety testing. Quality control standards must include: duplicate analysis; positive/negative controls; routine proficiency testing; and process validation through check samples or external certification. All analytical methods must be approved by accredited organizations (AOAC, ISO) and must be appropriate for beverage ingredient applications.

Equipment and Personnel: Laboratory equipment requirements include: calibration and maintenance in accordance with Section 7.4; climate control; and segregation between microbiological and chemical testing areas. Personnel conducting microbiological testing must have documented training on facility procedures and safety protocols in accordance with Section 2.6.3, with annual competency verification.

7.4. INSTRUMENT CALIBRATION PROGRAM

General Calibration Requirements: All instruments critical to safety, quality, or legality must be calibrated at predetermined frequencies based on risk assessment. Calibration must be traceable to national or international standards, with records maintained that include: instrument identification; calibration date; technician name; reference instrument used; and findings before/after calibration.

Monitoring Device Calibration: Environmental monitoring devices, temperature and time monitoring devices, and all critical control point monitoring equipment must follow these calibration requirements.

Non-Conforming Equipment Procedures: Procedures must address out-of-calibration equipment, including material holds and disposition of affected products. External calibration services must have third-party accreditation to recognized standards.

7.5. RESEARCH AND DEVELOPMENT OF FOOD SAFETY & RISK MANAGEMENT

Suppliers must have documented programs for managing research and development affecting food safety, quality, or regulatory compliance. This includes the following types of changes: changes in formulas, specifications, materials, processes, systems, equipment, or facilities.

Programs must include the following elements: documented food safety risk assessment for new products and existing product changes; impact assessment on quality; approval processes for innovation and changes; and customer communication protocols.

APPENDIX A
REFERENCE STANDARDS AND REGULATIONS

I. U.S. Federal Regulatory References

FDA Regulations

Food Safety Modernization Act (FSMA):

- 21 CFR §117 - Current Good Manufacturing Practices, Hazard Analysis, and Risk-Based Preventive Controls for Human Food
- 21 CFR §110 - Current Good Manufacturing Practice in Manufacturing, Packing, or Holding Human Food
- 21 CFR §111 - Current Good Manufacturing Practice in Manufacturing, Packing, Labeling, or Holding Operations for Dietary Supplements
- 21 CFR §117.130-117.136 - Hazard Analysis and Risk-Based Preventive Controls
- 21 CFR §117.165 - Verification and Validation

Facility Registration:

- 21 CFR §1.230-1.368 - Registration of Food Facilities (Bioterrorism Act)
- FDA Form 3537 - Food Facility Registration

Food Contact Substances:

- 21 CFR §170-189 - Food Additives and Food Contact Substances
- 21 CFR §175-178 - Indirect Food Additives (Food Contact Substances)

Labeling and Nutrition:

- 21 CFR §101 - Food Labeling
- 21 CFR §101.36 - Nutrition Labeling of Food
- 21 USC §343 - Federal Food, Drug, and Cosmetic Act - Misbranded Food

Pasteurization and Thermal Processing:

- 21 CFR §113 - Thermally Processed Low-Acid Foods Packaged in Hermetically Sealed Containers
- 21 CFR §114 - Acidified Foods
- FDA Food Code 2022 - Pasteurization Requirements

Transportation:

- 21 CFR §1.908-1.912 - Sanitary Transportation of Human and Animal Food (FSMA)
- 49 CFR Parts 100-185 - DOT Hazardous Materials Regulations

TTB Regulations (Alcoholic Beverage Ingredients)

Distilled Spirits:

- 27 CFR Part 19 - Distilled Spirits Plants
- 27 CFR Part 21 - Formulas for Denatured Alcohol and Rum
- 27 CFR Part 25 - Beer

Excise Tax:

- 26 USC Chapter 51 - Distilled Spirits, Wines, and Beer
- 27 CFR Part 26 - Liquors and Articles from Puerto Rico and the Virgin Islands

Labeling:

- 27 CFR Part 5 - Labeling and Advertising of Distilled Spirits
- 27 CFR Part 7 - Labeling and Advertising of Malt Beverages

USDA Regulations (Where Applicable)

- 7 CFR Part 205 - National Organic Program
- USDA Organic Foods Production Act (OFPA)

Environmental Protection Agency (EPA):

- 40 CFR §141 - National Primary Drinking Water Regulations
- 40 CFR §180 - Tolerances and Exemptions for Pesticide Chemical Residues in Food

Department of Transportation (DOT):

- 49 CFR §172.101 - Hazardous Materials Table
- 49 CFR §173 - Shippers - General Requirements for Shipments and Packagings

Import/Export Regulations:

- 19 CFR Parts 1-199 - Customs and Border Protection Regulations
- 21 CFR §1.276-1.285 - Prior Notice of Imported Food
- 21 CFR §1.500-1.512 - Foreign Supplier Verification Programs (FSVP)

II. State Regulatory References

California:

- California Proposition 65 (Safe Drinking Water and Toxic Enforcement Act)
- California Health and Safety Code §110460-110465 - Food Processing

New York:

- New York Article 20-C – Food Processing Operations
- New York Agriculture and Markets Law Article 17 – Food Safety

Texas:

- Texas Food Establishment Rules (25 TAC Chapter 229)
- Texas Agriculture Code Title 6 – Food Safety

III. Industry Standards and Certification Bodies

Global Food Safety Initiative (GFSI) Benchmarked Schemes

BRC Global Standard for Food Safety (Issue 9):

- **Certification Body:** Various UKAS accredited bodies
- **Website:** https://www.brcgs.com/
- **Scope:** Manufacturing, storage and distribution of food and food ingredients

Safe Quality Food (SQF) Institute (Edition 9):

- **Certification Body:** SQFI Licensed Certification Bodies
- **Website:** https://www.sqfi.com/
- **Scope:** Primary production through manufacturing and distribution

Food Safety System Certification 22000 (FSSC 22000 Version 6):

- **Certification Body:** FSSC 22000 Licensed CBs
- **Website:** https://www.fssc22000.com/
- **Scope:** Food manufacturing and food packaging manufacturing

International Featured Standards (IFS Food Version 8):

- **Certification Body:** IFS Approved Bodies
- **Website:** https://www.ifs-certification.com/
- **Scope:** Food manufacturers and food packers

Laboratory Standards and Testing Methods

ISO/IEC 17025:2017:

- General Requirements for the Competence of Testing and Calibration Laboratories
- Accreditation Bodies: A2LA, ANAB, NVLAP
- Required for: Food safety pathogen testing, chemical contaminant analysis

AOAC International:

- Official Methods of Analysis
- Website: https://www.aoac.org/
- Scope: Validated analytical methods for food testing

Microbiological Testing:

- AOAC Official Methods of Analysis – Microbiological Methods
- FDA Bacteriological Analytical Manual (BAM)
- ISO 16140 - Microbiology of Food and Animal Feeding Stuffs

Chemical Testing:

- AOAC Official Methods - Chemical Analysis
- ASTM International Food and Agricultural Standards
- USDA National Organic Program Testing Methods

Physical Testing:

- ASTM D4169 – Standard Practice for Performance Testing of Shipping Containers
- TAPPI Test Methods for Packaging Materials

- GMA/PMMI Guidelines for Package Testing

Food Safety Management Standards

Codex Alimentarius:
- **Website**: http://www.codexalimentarius.org/
- General Principles of Food Hygiene (CAC/RCP 1-1969)
- HACCP Principles and Application Guidelines

Specialized Program Standards

Metal Detection and Physical Contamination:
- ANSI/ASQ Z1.4 – Sampling Procedures and Tables for Inspection by Attributes
- AIB International Standards for Metal Detection

Environmental Monitoring:
- ICMSF Book 7, Chapter 11 – Sampling to Assess Control of the Environment
- FDA Guidance: Control of Listeria monocytogenes in Ready-to-Eat Foods
- USDA-FSIS Directive 10,240.4 – Verification Activities for Listeria monocytogenes

Allergen Management:
- FDA Food Allergen Labeling and Consumer Protection Act (FALCPA)
- Food Allergy Research & Education (FARE) Guidelines
- Grocery Manufacturers Association Allergen Control Guidance

Food Defense and Fraud:
- FDA Guidance: Mitigation Strategies to Protect Food Against Intentional Adulteration
- USDA FSIS Food Defense and Emergency Response Guidelines
- Global Food Safety Initiative (GFSI) Food Fraud Guidance

Transportation and Logistics:
- GS1 Logistic Label Guideline
- CTPAT (Customs-Trade Partnership Against Terrorism) Guidelines
- ISPM-15 International Standards for Phytosanitary Measures (Wood Packaging)

Beverage Industry Standards:
- Brewers Association Quality Assurance Standards
- Beverage Industry Environmental Roundtable (BIER) Guidelines
- Can Manufacturers Institute (CMI) Standards
- Glass Packaging Institute (GPI) Standards

IV. Certification Body Information

GFSI Certification Bodies (US Operations)

NSF International:
- **Standards:** BRC, SQF, FSSC 22000
- **Website:** https://www.nsf.org/

SGS North America:
- **Standards:** BRC, IFS, FSSC 22000
- **Website:** https://www.sgs.com/

Bureau Veritas:
- **Standards:** BRC, IFS, FSSC 22000
- **Website:** https://www.bureauveritas.com/

SAI Global:
- **Standards:** BRC, SQF
- **Website:** https://www.saiglobal.com/

ALS Global:
- **Standards:** SQF, FSSC 22000
- **Website:** https://www.alsglobal.com/

Laboratory Accreditation Bodies

American Association for Laboratory Accreditation (A2LA):
- **Website:** https://www.a2la.org/
- **Scope:** ISO/IEC 17025 accreditation for food testing laboratories

ANSI National Accreditation Board (ANAB):
- **Website:** https://www.anab.org/
- **Scope:** ISO/IEC 17025 accreditation for testing and calibration laboratories

National Voluntary Laboratory Accreditation Program (NVLAP):
- **Website:** https://www.nist.gov/nvlap/
- **Scope:** Federal accreditation program for testing laboratories