



Audit Report

Global Standard for Food Safety Issue 7: July 2015

1. Audit Summary			
Company name	HOANG SON I JOINT STOCK COMPANY	BRC Site Code	6123771
Site name	HOANG SON I JOINT STOCK COMPANY		
Scope of audit	Processing of cashew nut kernels (sorting, grading, drying and vacuum plastic packing of cashew kernels)		
Exclusions from scope	None		
Justification for exclusion	None		
Audit Finish Date	2018-10-13		
Re-audit due date	2019-10-11		

Voluntary modules included		
Modules	Result	Details
FSMA Preventative Controls and FSVP Preparedness	Passed	See checklist as below
Choose a module	Choose an item	
Choose a module	Choose an item	

2. Audit Results					
Audit result	Certificated	Audit grade	A	Audit type	Announced
Previous audit grade	Choose an item	Previous audit date		Select a date	

Number of non-conformities	Fundamental	0
	Critical	0
	Major	0
	Minor	9

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3. Company Details			
Address	Hamlet 2, Duc Lieu Commune, Bu Dang District, Binh Phuoc province, Vietnam		
Country	VIETNAM	Telephone Number	84 2716281025
Commercial representative Name	TA QUANG HUYEN/ DIECTOR	Email	Ctyhoangson1@gmail.com
Technical representative Name	Huynh Thanh Cong/QA MANAGER	Email	Congkt85@gmail.com

4. Company Profile					
Plant size (metres square)	10-25K sq.m	No. of employees	51-500	No. of HACCP plans	1-3
Subcontracted processes	No				
Other certificates held	ISO22000, HACCP				
Regions exported to	North America Europe Asia Choose a region Choose a region Choose a region				
Company registration number	FDA 13033224106				
Major changes since last BRC audit	None				
Company Description Hoang Son I Co., Ltd has established 2002 with primary formerly. Nearly 16 years' experiences establishing & growing has gradually asserted its position in cashew nut processing industry. Hoang Son are well-established as a manufacturer, supplier of cashew kernel products. Capacity: 100 tons raw/day of cashew Quality management system: BRC, ISO 22000, HACCP. Totals 1 HACCP in scope of audit. Total square of facility: 25,000 m2. Square meters production: 9,500 sqm. Main markets: Europe, USA and Asia. Employees in production: 119 workers. Operating 1 shift/ 8hours, 6 days per week. Start at 08:00 am to 17:00 pm. Number of processing: 01 The company located distance 150 km distance from Sai Gon City of Vietnam Country					

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5.Product Characteristics					
Product categories		06 - Prepared fruit, vegetables and nuts VM - FSMA Preventative Controls and FSVP Preparedness Category Category Category Category			
Finished product safety rationale		Sorting, grading, fumigating treatment process. Moisture content max 5 %. Stored at ambient condition			
High care	No	High risk	No	Ambient high care	No
Justification for area		Raw product at ambient temperature			
Allergens handled on site		Nuts Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen			
Product claims made e.g. IP, organic		None			
Product recalls in last 12 Months		No			
Products in production at the time of the audit		Cashew kernels nut size 50 lbs			

6. Audit Duration Details			
On-site duration	24 man hours	Duration of production facility inspection	10 man hours
Reasons for deviation from typical or expected audit duration	Time as per BRC audit calculator and FSMA audit		
Next audit type selected	Announced		

Audit Duration per day			
Audit Days	Audit Dates	Audit Start Time	Audit Finish Time
1 (start date)	2018-10-11	08:30	17:30
2	2018-10-12	08:30	17:30
3 (finish date)	2018-10-13	08:30	17:30

	Auditor (s) number(s)	Names and roles of others
Auditor Number	176539	Nguyen Hong Trung
Second Auditor Number	N/A	

Present at audit				
Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings (ref: clause 1.1.9)	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
	Name / Job Title			
Ta Quang Huyen/Director	X	X	X	x
Nguyen Hong Nga/Vice Director	X	X	X	X
Huynh Thanh Cong/FSTL	X	X		X
Do Hong Luu/Production manager	X	X	X	X
Nguyen Van Quy/Maintenance	X		X	X
Le Thi Van/sale manager	X	X	X	X

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Non-Conformity Summary Sheet

Critical or Major Non Conformities Against Fundamental Requirements				
No.	Clause	Details of non-conformity	Critical or Major?	Anticipated re-audit date

Critical			
No.	Clause	Details of non-conformity	Anticipated re-audit date

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Major							
No.	Clause	Details of non-conformity	Correction	Proposed preventive action plan (based on root cause analysis)	Evidence provided	Date reviewed	Reviewed by

Minor							
No.	Clause	Details of non-conformity	Correction	Proposed preventive action plan (based on root cause analysis)	Evidence provided	Date reviewed	Reviewed by
1	3.4.1	GMP audits performed once per monthly and missed on Aug 2018.	Hygiene inspection, GMP was planned and missed audit as monthly by QA team Addition monthly audit immediately by HACCP team	Hygiene inspection, GMP will planned and conduct audit as monthly by QA team as plan.	Audit GMP record of Oct 2018.	2018-11-04	Trung Nguyen
2	4.1.2	Crash on the external traffic route was observed, it need to be improvable	The site failed to consider the external traffic route since it is located outside the moving route. The technical department fix the gap immediately	Regularly check and maintained by technical department	Pic before and after	2018-11-04	Trung Nguyen
3	4.1.3	A few debris (pipes, steel coil) was observed at drying area	Removed and clean this area immediately by technical department	Regularly check and maintained by technical department	Pic before and after	2018-11-04	Trung Nguyen
4	4.4.1	A few small debris from the wall (window area) was observed in the sorting area.	Cracks on wall near window tiles were due to the force during maintenance service from the technical. Technical department will fix it immediately	Requirement of technical staff to prevent crashed on the floor	Pic before and after	2018-11-04	Trung Nguyen

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5	4.4.2	Partial crash of brick on the floor in fumigation intake area	Cracks on floor tiles were due to the force during unloading of cashew material from the mobile vending device. Replace cracked tiles/ brick on the floor	Requirement of mobile vending device follow line to prevent crashed on the floor	Pic before and after	2018-11-04	Trung Nguyen
6	4.8.8	Smoking is designated area; however smoking butt was found in the route before pre-processing area	Cleaning this section and announce no smoking identification	Supervisor is checked hygiene at their section and responsibility for recurrence.	Pic of NO SMOKING and Smoking area.	2018-11-04	Trung Nguyen
7	4.11.6	The cleaning tool (brush) was put wrong place in production area (sorting step)	Required staff follow SSOP cleaning procedure and check before stop cleaning process	Because of mistake from in charge staff when end of shift	Pic before and after	2018-11-04	Trung Nguyen
8	4.14.5	One of rodent glue bait no 54 in not good (broken) in sorting area.	It may crash during strike against something and person in charge of pest service missing report to production manager although record has been done by staff.	Require external service of pest to evaluation and replace new one.	Pic before and after	2018-11-04	Trung Nguyen
9	6.1.1	Documented of instruction specification was not in place in optical sorting machine.	Relabelling of operation instruction on to optical sorting.	Operators staff at optical sorting step must check to make sure that operation instruction was placed in machine, asked Maintainer Leader add new one if missing.	Pic before and after	2018-11-04	Trung Nguyen

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Comments on non-conformities

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Voluntary Modules Non-Conformity Summary Sheet

Critical			
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Major							
No.	Clause	Details of non-conformity	Correction	Proposed preventive action plan (based on root cause analysis)	Evidence provided	Date reviewed	Reviewed by

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Minor							
No.	Clause	Details of non-conformity	Correction	Proposed preventive action plan (based on root cause analysis)	Evidence provided	Date reviewed	Reviewed by

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FSMA Module Non-Conformity Summary Sheet

Critical			
No.	Clause	Details of non-conformity	Anticipated re-audit date

Major							
No.	Clause	Details of non-conformity	Correction	Proposed preventive action plan (based on root cause analysis)	Evidence provided	Date reviewed	Reviewed by

Minor							
No.	Clause	Details of non-conformity	Correction	Proposed preventive action plan (based on root cause analysis)	Evidence provided	Date reviewed	Reviewed by

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Detailed Audit Report

1. Senior management commitment

1.1 Senior management commitment and continual improvement

Quality policy documented on STCL, rev.00, date 12/1/2018, approved by Ta Quang Huyen/Director: "Product of Hoang Son I always complied of requirement of customer & regulation on food safety, fully complied legality & other relative; Always to environment protective & ethical business, no limited improvement to effectiveness of QMS on food safety". The policy and objective were communicated to relevant staff by meeting, email and conference.

The Quality Objective 2018 has been established on date 12/1/2018:

- 100 % lot no protective of pesticides
- < 3 max complaint on quality & food safety
- Zero recall on food safety
- > 97% lot on time delivery
- 100% lot pass on quality as contracted.
- 100% employees health screend annually
- 1000% equipment maitenanncce & calibration.

Verified objective of 2017, all objective achieved

The management review was meeting for annually, defined in HS-TT-09, rev.00, 21/5/2018. Last review on BM01-TT09 conducted on dated 12.08.2018 including 06 keys of members with 09 contents reviewed with input content/ final decision/ dated completed/ result including: complaints customer, reviewed HACCP plan, 3rd audit result (ISO 22K), specification reviewed..., incident and recall no see seen. Final review and authorised by Ta Quang Huyen/ Director with signed and recorded is verified.

BRC version 7 available on PDF files on QA department and other relevant. Mr. Huynh Thanh Cong/QA manager responsible updated all scientific and technical developments, industry codes of practice and all relevant legislation applicable, according to document control procedure, by contact the local association (VINACAS), contacting with customers and visit EU food regulation website (<http://eur-lex.europa.eu>).

The monthly meetings relating food safety, legality and quality including Director, Vice Director, QA Manager, Production manager, HACCP team members, Maintenance, Purchasing Dept. The last July 2018 date 27, no big issue relating to food safety

The Plant Manager/Mr. Do Hong Luu been attended the opening and closing meetings.

This is initial visited.

1.2 Organisational structure, responsibilities and management authority

The Management structure Orgaziantion was defined in Quality Manual STCL, rev.00, date 12/1/2018. It has been clearly defined manegement positions and interaction of each other. Plant Manager Mr. Do Hong Luu who over 10 years experience in production management, who report to Ta Quang Huyen/Director. Operational level including Factory Manager/ Vice Director/ QC/ Production/ Warehousing/ Chief of shift.

Job description and deputise in the absence were clearly stated on the description of each department. Interview Ms. Le Thi Van./HACCP staff, she understood her job to done right way a part of FSMS. All members report to Mr. Ta Quang Huyen/Director.

All documented work instructions be kept and under controlled through document control system.

Details of non-applicable clauses with justification

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Clause reference	Justification
1.1.8	N/A
1.1.10	N/A
2 The Food Safety Plan – HACCP	
<p>The HACCP team, comprised 06 members, have collected from multi-disciplinary: Production, QC, Sale, maintenance. Steering Committed # 01/QD-HACCP, date 20/05/2018, approved by Ta Quang Huyen/ Director. The certificate of Huynh Thanh Cong/ team leader – HACCP Codex & Method analysis risk course on 12-14/7/2017 has been kept on file, he has over 7 years' experiences in nut cashew industries.</p>	
<p>Scope of each HACCP plans clearly defined for Cashew Kernels products HS-HACCP-01, rev.0 and dated 20/04/2018. Product description: cooking, use and storage instruction on label: ambient temperature, 18 months' shelf-life.</p> <p>Relevant information has been collected adequately to conduct hazard analysis and to ensure product safety in compliance with AFI standard; Codex Alimentarius, Specification of cashew kernel from FDA April 1999, Vietnamese standards TCVN 4850:1998 for cashew kernel and Customer requirements</p>	
<p>11 prerequisites (SSOPs) on manual for processing of cashew nut kernel.</p> <p>Prerequisite programmes established and implemented as sanitation, pest control, maintenance, personal hygiene, training, purchasing, transportation, prevent cross contamination, allergen control. Monitoring records of prerequisite programs are maintained and reviewed daily by HACCP team. Prerequisite program review is included in the annual review of the HACCP plan</p>	
<p>Process of cashew kernel step: Cashew kernels material/ sorter/ Sizing by hand/ Fumigation/ Sieving/ X Ray/ Scale/ Vacuum/ metal detection/carton packing /storage /Loading.</p> <p>Sub chart: receiving of packaging material /checking /keeping /storage /using / packing. The intend use for food industries, human consumption with fully cooked before eat except allergen people.</p>	
<p>Significant hazards identified such as: Mycotoxin, heavy metal; pathogen in raw materials; metal in raw materials and from equipment. Mycotoxin, pesticide residue and heavy metal in cashew are controlled as require suppliers of cashew kernel having HACCP certification. The team have used a 4 steps decision tree to definition of CCP. There are 2 CCPs:</p> <ul style="list-style-type: none"> - CL: Fumigation: Live insect check and residue of fumigation control. - CCP1: Fe – 1.5 mm, Non-Fe 1.8 mm, SUS 2.2 mm, glass 2.5 mm, ceramic 3.0 mm. Samples tested 02 hour <p>Critical limits set up based on regulation and code of practice.</p> <ul style="list-style-type: none"> - Critical limit: X-ray. Foreign matter samples. The limits comply with FDA guideline. Samples tested every hour <p>CL: fumigation 7 days, concentration of PH3 9g/ m3 and expose time min 12 hrs. The limits have been validated once per year.</p>	
<p>Corrective action plan for each CCP identify with details of action taken when the limits are exceeded. Identified responsible persons i.e. production, supervisor and QA manager. Actions taken included stop line, hold, reject and making decision by QA manager, all were kept in record. Documented corrective action procedure is in place and implemented when the critical limits are not met. Everything required Prerequisite programmes were established and implemented accordingly. An interview with person in charge of CCP monitoring indicated that, the procedure is implemented.</p>	

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Review of records and interviews with processing staff showed that they were aware of the CCPs and the actions to be carried out.
 Validation of CCP1: results have been demonstrated that hazard of annually calibration of all metal detectors. Calibration have been included the testing with metal (Fe – 1.5 mm, Non-Fe 1.8mm, SUS 2.2 mm, glass 2.5 mm, ceramic 3.0 mm) samples, inserted in products with identification mark on packaging by ANCO. Record AC0818223 on date 30/8/2018 reviewed.

HACCP plan reviewed at least every year by HACCP team. Last review of HACCP plan date 2018-05-20

Details of non-applicable clauses with justification

Clause reference	Justification
N/A	

3. Food safety and quality management system

3.1 Food safety and quality manual

Food safety and quality manual defined on STCL, rev.01, updated 22/4/2018, including procedures and Work instruction, 11 SSOPs on manual, rev.01, date 22/5/2018; GMPs manual for processing of blanched Cashew kernels updated 22/4/2018, reviewed by production manager, approved by Ta Quang Huyen/Director. All documents by Vietnam language were seen. Food safety and quality management system was well established based on the requirements of HACCP and other relevant reference and regulatory requirements such as HACCP Principles by the Codex Alimentarius, EU regulatory, BRCF v7, Vietnam Regulation.

3.2 Documentation control

Documentation control procedure HS-TT-01, rev 0 date 21/5/2018. Master list of document BM02-TT01 & Document distribution control BM03-TT01 include HACCP plan, SSOPs, GMPs, procedures, policy, work instructions, form with issue date, current revision, modified date, reason for modifying, allocation. The documents marked “controlled” in the current version and marked “obsolete” in the old version. Document is approved by authority

3.3 Record completion and maintenance

All records related product and process performances retained in 3 years (18 months of shelf life plus one year) as mentioned in quality manual/ record control procedure HS-TT-02 (rev 01, issued date 21/5/2018) HACCP study defined.

3.4 Internal audit

Scope of Internal audit procedure HS-TT-03 rev 0 date 21/5/2018 once per year mention to standard ISO22000/HACCP and BRC.
 Internal auditors have been trained BRC standard. The internal audit plan though out a year.

Self-assessment tool used to gap analysis which performed though out a year depend on department by independence auditor trained (not audit on their work). Internal audit report date 2018-06-15 and 09 non-

conformances raised.
Internal audit plan BM01-TT03 though out a year

GMP inspection be scheduled monthly as plan, specified and was not done in this audit, last result was seen on recorded BM05-TT03, Jun and July 2018 with Clause/ compliance/ description by Huynh Thanh Cong/HACCP member

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw materials and packaging

Suppliers Approval Procedure HS-TT-07, rev.01, dated 21/5/2018. Assessment criteria accordance to checklist BM04-TT07 included criteria: quality, control process, price, time delivery, service after delivery Every supplier must be over > 70 marks are accepted (maximum total criteria 100 marks). List suppliers approved on BM05-TT07, dated 05.06.2018 included: 01 packaging as Tan Huong, KOP carton, 01 service (transportation as Hoang Phuc Minh), cashew kernel (Tran Thi Hanh, Le Thi Tham, Pham Duy Quang supplier) material with name supplier/ address/ kind of supply/ dated of audit/ approved has been reviewed. On-going assessment for Supplier of carton based on questionnaire.

- 3rd party certification (require GFSI recognised scheme)
- Or if not certified, onsite audit (score pass 70%)
- Supplier questionnaire

Risk assessment implemented all kind of material of all suppliers on 22/07/2018 part of HACCP plan. Record of audited supplier reviewed, including 01 approved suppliers of cash kernel, 02 packaging (PA, carton). Raw cashew kernel material from source Tran Thi Hanh, Le Thi Tham, Pham Duy supplier included traceability on site on the same dated. Service suppliers (Fumigation – VFC evaluated date 31/5/2018, transportation on date 30/05/2018 & testing, inspection service Vinacontrol), hazardous waste signed by Mr. Ta Quang Huyen/Director are available reviewed.

The QA manager and Sale Department will be ongoing assessment every year to approve suppliers. No outsource processes applicable.

3.5.2 Raw material and packaging acceptance and monitoring procedures

All cashew nut kernel material buying from 11 suppliers approved. Packaging with business license from Government with COA when receiving required.

Documented for acceptance raw materials and packaging defined in F-GMP-0x – receiving that include:

- Visual inspection and moisture on receipt
- CoA of material packaging report KT3-00738AHD8/1

Sampling testing for pathogen (Y & M, TPC, Coliform Salmonella, Staphylococcus, E.coli, Aflatoxin, heavy metal, moisture, (every 12 months). Records of raw material checks for each lot of material are maintained.

3.5.3 Management of suppliers of services

Controlled suppliers of services: laboratory: ISO 17025 certificate, fumigation, hazardous waste, calibration has licence of Government, training and transportation: licence business

Supplier evaluation Procedure HS-TT07, issued date 22/5/2018. Criteria for approval of suppliers of services. Evaluation records of pest control (VFC company) service date 2018-05-01. Transportation date 2018-05-01. Inspection service (Vina control) date 2018-05-01. Score pass must achieve 70%

3.5.4 Management of outsourced processing and packing

No outsourced processing and packing.

3.6 Specifications

Specification of Cashew kernels material, semi, finished product: TC1 & TC2, rev.01, date 22/5/2018
 Specification of packaging: TC3: packaging detailed on Specification Manual.
 All specifications established and reviewed by Huynh Thanh Cong/QA Manager.
 These specifications are reviewed annually and other is 3 years or reviewed immediately when any change effective safety food.
 Almost specification was adequate and complies with legislative requirements. Specification of Cashew kernels complied with AFI standard; PA, PE complied with 2007/19/EC (safety for material packaging contact food) and QCVN12-1/2011/BYT (Vietnam regulation), Annex II, 10/20112007/19/EC (safety for material packaging contact food). QCVN01:2010/BNNPTNT: National technical regulation on fumigation procedures.

3.7 Corrective and preventive actions

Defined in Corrective action procedure HS-TT05, rev.01, dated 21/5/2018 which was clearly step should be complying such as: recorded non-conformity, analysis root cause, corrective action and prevent occur and verified. Record keeping follow as Record Control Procedure HS-TT-02. All records have stored place and secured with good condition by QA department for ready accessibility. All corrective action was including on Management review.

3.8 Control of non-conforming product

Defined clearly in the non-conformity control procedure HS-TT-04, rev.01, dated 21/5/2018. In facility and line production identified by square crate put on floor. In store, has been segregated area with identified clearly labelling. All non-conformity products recorded on BM01-TT04. The employees identify and report potentially non-conforming product to QC supervises on line production. Only factory manager authorised to remove product. By interviewed during audit, all staff clearly understood process.

3.9 Traceability

Defined on Traceability HS-TT-12, rev.01, issued date 21/5/2018. Finished product including text & digits with order: Code of raw material supplier (1 text)/ Code of date production (8 digits – dd.mm.yyyy) has been identify by paper work link all steps enables trace of raw materials and packaging from supplier through processes to packing and loading.
 Packaging and food chemical with date and lot number receiving.
 No bulk materials used.

Traceability tested annually for both trace forward and trace back. The last test trace back date 25/7/2018 for finished product code WW240 cashew nut kernel, production date 2018-07-13, supplier Tran Thi Bich Hanh, lot no NĐHANH03, receiving date 11/3/2018, total 398,710 kg, plastic packing material lot no KOP1306.

Traceability test for suppliers performed at the onsite audit. For low risk supplier, such as packaging material is verified their traceability system on first approval and then at least every 3 years by directly testing traceability as part of the company's traceability exercised.

Traceability test onsite by auditor include 1 trace forward. Trace backward from on contract no 0223, customer JIANSU on finished product cashew nut kernel code W320, total 680 cartons as 15,422.4 kg product lot no NĐ-HANH04/0233, shipping date 13/7/2018, production date 1/7/2018, supplier TRAN HONG HANH, lot raw cashew no NĐHANH04, packing lot no KOP1306. Trace test completed within 2.0 hours.
 No rework applied

3.10 Complaint handling

Customer complaint handling procedure HS-TT-08, issued date 22/5/2018. There are no complaints in 2017. Records BM01-TT08 include. Complaints recorded and reported in the management review

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meeting. Complaint records verified, include content of complaint, investigation, correction and preventive action. Complaint form has name of client, date, content of complaint. Other information eg. Investigation, corrective actions defined on email replying to the client. Total of complaint summarized annually and classified as foreign matter issue, quality, packaging, service, delivery for trend analysis on date 2018-05-30.

3.11 Management of incidents, product withdrawal and product recall

Emergency procedure on HS-TT-10, rev.0, date 22/5/2018. Contingency planning for emergency response procedure included: disruption to key services such as water, energy, transport, staff availability and communications events such as flood or natural disaster, malicious contamination or sabotage and responsibilities with communication channels implemented. The contact list with 06 members with Ta Quang Huyen /Director/ Leader of team, including Government department contact number seen.

Recall procedure HS-TT-12, rev.01, dated 21/5/2018 was established. Annually mock test defined in procedure. The contact list was available, including contact number of Fire Emergency, Hospital, Supplier list, Customer list, Certification Body (SGS Vietnam), and Public health dept., expertise SGS VN used for notification in the event of product recall (3 days).

The latest test on 25/7/2018 for lot Cashew kernels ND-HANH03/0113, client August, W240, 15,876 kg, production date 13/7/2018 has been selected, small size supposed. Communication to customer by email was tested, and relevant information reported that 15.876kg of finished product from raw cashew lot as above, supplier TRAN THI BICH HANH have been fully traceable. Total time of traceability and recall decision is 1h40'. Detailed delivery and quantity have been reply one day after. Refer to the mock test, there is no further improvement required. No recalls from last 12 months.

3.12 Customer focus and communication

Defined on HS-TT-06, rev.01, dated 21/5/2018: Communication to customer procedure. Each contracted of customer specify by Sale staff by mail or fax, final approved by Ta Quang Huyen/Director. All information relative to requirement of customer description on Shipping Instruction and delivery to department relative such as production, Storage, Sale...Detailed of specify/ quantity/ time loading... clearly defined on recorded. Each department should be responsible preparing material, ingredients & packaging to comply with them

Sale department appointed to receive customer requirement, attach on the annex of contract and communicate to the relevant department and suppliers to produce product in compliance with customer requirements.

Details of non-applicable clauses with justification

Clause reference	Justification
3.5.1.3	No agents or brokers used
3.5.4.1	No outsourced processing and packing
3.5.4.2	No outsourced processing and packing
3.5.4.3	No outsourced processing and packing

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3.5.4.4	No outsourced processing and packing
3.9.4	N/A
4. Site standards	
4.1 External standards	
The plant has been fully segregated with outside environment. No local activities or source of pollution, which may have an adverse impact on finished product integrity. Factory location allows the convenient transport of raw material and deliver of finished product. The external road by Cement. Surrounded by 2.0 m in height brick wall. External road was maintained in good condition. There was adequate space for pest inspection around the building. No standing water observed. No dormitories in factory	
4.2 Security	
<p>Defined in Security & Food Defence Procedure HS-TT-16, rev.01, date 22/5/2018. Visitor and subcontractor must be identifying "Visitor" card & declaring information before entrance main gate & confirm by Security to office accepted. Employees with ID card showed. Enclosed site within 24-hour security.</p> <p>Security risk management is applied and at Cashew kernel raw material receiving, packaging is locked and restricted. Production area is only authorised staff have access. Packing room & storage product is separated area authorised person.</p> <p>Base on risk assessment documentation and defined in the security procedure P24, reviewed annually. Last review on date 11/7/2018 is in place and implemented well, record BM01-TT16, checklist as FDA food defence guidance applied.</p> <p>All staffs were trained on security policy and procedure when recruited. FDA register. No local regulation required.</p>	
4.3 Layout, product flow and segregation	
<p>The site plan has identified risk level and defined logical routes of materials, employees, and waste... in drawing. Grading, optical sorting, packing, metal detection, storage is segregated by walls. Every area has dedicated area for cleaning tools storage separated from production.</p> <p>Identified position for product, tool, machine... by colour lined on floor.</p> <p>The factory has been corrected identified risk level of the different areas on site. Low risk was defined from raw receiving to before packing of pepper product. Enclosed product is packing and storage areas. No high care, high care ambient area & high-risk area on site as map update 2018.</p> <p>No refurbishment works or temporary structures that may affect product safety at time audit.</p>	
4.4 Building fabric, raw material handling, preparation, processing, packing and storage areas	
<p>Suitable for food production. Ceiling construction by plaster frame at packing area suitable in dry food building. Production areas were structured with enough ventilation.</p> <p>Floors are polyurethane technical is suitable for food processing, no crack and hole.</p> <p>Wall by brick tile white ceramic at fumigation, packing & storage is smooth, water proof wall, bright colour, maintained in clean condition. Ceiling were constructed from material which suitable for cleaning. Glass windows with adhesive sheet to protect against breakage.</p> <p>Suspension ceiling was observed cleaning, no dust, and easy to inspection of pest activities, the void fully sealed.</p> <p>The lights were led technical have been fully protected and closely fit to ceiling to prevent from dust collecting.</p> <p>All doors by fitting and yellow plastic curtains. All accesses have been fully sealed to prevent from pest ingress. Window screened direct to external. Check air conditioners at X ray, packing had been maintained well. Drainage was suitable designed and no stagnant water observed during onsite audit.</p>	

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Drainage and ventilation are suitable for the purpose. No used water all step production, no drain waste seen.

4.5 Utilities – water, ice, air and other gases

Water no used on cashew kernels process. Only using water for washing hand as water distribution plan by tape numbered as water map identified, no water back flow by one way valve cut-off. Water is sourced from Binh Phuoc Municipal supply with water testing plan as monthly in place. Result testing input of water on 153/KSBT-XN, date 12/6/2018 by complied with National technical for potable water Vietnam regulation on microbial & chemical parameters.

No air using at packing step.

4.6 Equipment

Most contact surface of production and packaging were stainless steel, and kept well. Equipment have been constructed of stainless steel such as sieves, sorter, hopper, 09 optical sorters, 04 system magnets, 30 Dryers, 8 room fumigants, 2 X – Ray, 2 metal detection... machines have been installed.

Main equipment of conveyor systems around 3 years under routine maintenance systems. Well positioning and placing for all equipment. Food contact made of suitable materials.

4.7 Maintenance

Defined in maintenance procedure HS-TT-13, rev.01, dated 22/5/2018. All equipment after maintenance cleaning by staffs and verified by QC control this area. Almost maintenance by staffs in house. No temporary repair during on site visited. Plan maintenance on BM01-TT13 dated 1/2/2018.

Equipment in needed to maintenance with name of equipment/coded/ month defined recording BM06-TT13, dated 12/7/2018 of air conditioner at X ray room reviewed.

Lubricant using in direct food was Shell Cassida Grease code H1 Food grease. The maintain food allergen safety declared free of gluten on MSDS was seen.

Documented hygiene inspection on start-up completed by completed by Huynh Thanh Cong/QA Manager.

Maintenance work shop is far from production, separately as physical area

No major breakdowns in last 12 months.

4.8 Staff facilities

Specific work wears, changing rooms are provided for all staffs and visitor prior to entry to production area. Control of this by dedicated cleaning staff.

Adequately private cabinet lockers are external production area, floor off provided.

No high risk, high care & ambient high care onsite.

Plastic slipper and shirt provide for all staff and visitor prior to entry to production area. Sufficient hand washing (free hand water taps, liquid soap, towel hand, spray alcohol) are provided on to production area.

Toilets are segregated and clean at time audit. Designated staffs are always available in this area to control cleaning and hygiene procedure.

Smoking is designated area, it not allowed in production area.

No canteen facilities have been supplied. All food not permits in to production area as prerequisite program cross contamination SSOP07, rev.1, date 25/5/2018

4.9 Chemical and physical product contamination control

Raw material handling, preparation, processing, packing and storage areas

Defined in Chemical handling procedure SSOP04, rev.01, date 22/5/2018. Purpose/ Requirement/ responsible operation & verification was defining on prerequisite program.

4.9.1 Chemical control

Only used fumigation chemical at fumigant step. Methyl bromide and Quickphos (56 – 58%, 2-3 pcs/MT, 3-5 days' release) chemical after used take out plant, control by Vinacontrol/Cafecontrol sub contractor. No stored onsite.

4.9.2 Metal control

No clips, staples and snap-off blade knife permitted in production area. Metal instrument eg. Knives are monitored daily at star-up and the end of shift. Inspection records and inventory records of knife are maintained. Metal detectors and X-ray used for control metal and foreign matters. Metal policy SSOP-11, rev.01, date 22/5/2018 has been established. List of items forbidden in packaging area is in place

4.9.3 Glass, brittle plastic, ceramics and similar materials

Glass and bristle control by SSOP-11, rev.01, date 22/5/2018. Daily checking recorded on F03-SSOP11: place/area/ code/status/corrective action tools input/ date in/ person bring/ kind of tool/ status/ quantity/ day out recording.

Recorded dated July & Aug 2018 verified found satisfaction. Staff well trained in process and mock incident has taken place for training. Breakage handling have been trained and mock tested annually. All glass from frame 1.5m high wall sticker over & numbered to controlling. Glass, brittle or hard plastic procedure has been documented isolation of potentially contamination area, inspection of footwear & clears up.

4.9.4 Products packed into glass or other brittle containers

No products packed into glass or other brittle containers

4.9.5 Wood

Wooden pallets and wooden baskets are not allowed in production (from the raw material storage and finished product storage).

4.10 Foreign-body detection and removal equipment

4.10.1 Foreign-body detection and removal equipment

Risk assessment of foreign mater as physical hazard including all step of Cashew kernels HS-HACCP-01, rev.1, date 20/5/2018 product.

4.10.2 Filters and sieves

No used filters.

3mm & 8mm diameter of Sieves used at after sorter and at begin conveyor belt inspection step. Weekly checking integrity with operation status / Quantity of foreign matter on report.

4.10.3 Metal detectors and X-ray equipment

As risk assessment on HACCP plan Cashew kernel, products after belt conveyor, immediately through X Ray and metal detection as CCP. The X Ray documents from vendor have demonstrated the industry best practice applied. Metal detection: Fe – 1.8 mm, Non-Fe 1.5 mm, SUS 2.2 mm frequently test at 60 minutes' interval. The Metal detection and X Ray devices (ceramic, glass) incorporate rejected system and audible alarm. A bin secure provided for detected products collecting, the documented in place to control failure as Non-conformity product procedure HS-TT04, rev.01, dated 22/5/2018.

4.10.4 Magnets

Magnetic strength is 5,000 gauges was used at end of conveyer belt inspection foreign mater step was seen. Daily inspection with Time checking/ integrity has been defined on recording.

Recorded May 2018 checking found satisfaction.

4.10.5 Optical sorting equipment

Used optical sorting after peeling step to classify the different colour of kernel

4.10.6 Container cleanliness – glass jars, cans and other rigid containers

No used glass jars, cans and rigid container

4.11 Housekeeping and hygiene

Defined in master planning Sanitation and Sanitation procedure SSOP-10, rev.01 updated 22/5/2018. All cleaned staff trained and refreshed training yearly. Cleaning procedures have been developed and verified by QA department. Validation carried out on set up of new equipment with machine manufacturers and have included extensive swabbing programme for E.Coli, Salmonella

All equipment, tools processing cleaned before and after shift work.

Direct contact with food (table, bowl) at begin & every shift & end shift, clean by clean clothes, swab test every year, test report issued by Y TE CONG CONG (VIALS 219) for TPC, Coliform, Salmonella verified test report 019559/VYTCC/XN dated 29/08/2018. Hygiene condition of table, container, conveyor, sieving ...machine is good condition during site visited.

Sufficiently food contact identified to monitor the hygiene condition of processing environment. Annually verification testing by accredited lab. Trends show issues identified all swabs result of contact direct in good result.

Trends show issues identified all swabs result of contact direct in good result.

4.11.7 Cleaning in place (CIP)

CIP was not applied

4.12 Waste / waste disposal

Waste management SSOP-02. Waste classified as organic waste, solid waste, hazardous waste which collected in the designed waste bin. No accumulation waste was found. Surround the plant area have been kept clean, adequate trash bins have been provided and maintained in clean status.

Waste from production area (dropped product, peeling and separate segment) identified bins covered separate moved by window screen. Sewage treatment has been controlled, effluent meet local legislation, all solid wastes have been removed and treatment by service contractors. Cashew nut waste collected on red crate, removed out of processing areas end of shift. Hazardous & Solid waste collected by Thao Duong Xanh, contract no /2018/HDXL-TDX. Hazardous treatment by same sub above with License of Government, daily take out.

No trade-marked waste is handled requirements.

4.13 Management of surplus food and products for animal feed

Each contracted customer with detail quantity product defining, the Production Manager should be produce according as contracted. Daily mass balance each order with contract no./lot coded/carton remained/ stock supervise during time to finish contracted. Only decal, rider & carton with branded of customer defined as surplus material. Stock waiting for next order. Annually, house keeper inventory card to destroy packaging if customer not continuous business.

No surplus customer-brand product sent for animal feed. No products intended for animal feed

4.14 Pest Control

Defined clearly in Pest control prerequisite program SSOP-01, rev.01, dated 22/5/2018. Contract no

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P/2017 with VFC – Expert Pest master Company with frequency defining: Insect control twice per week. Adequate number with 126 traps cage around internal storage + 88 external walls of plant and 10 electrocuting devices installed to control pest ingress. Map traps rodent and insect killers on SO DO PEST, date 22.06.2018 to control rodent and insects. Trapping from night to morning next day. Spray insect routine twice per month by VFC Expert service.

Record on # 25091, dated 28/09/2018 of VFC Pest master was maintained for rodent and insect caught with chemical, location applied Permethrine 50SC chemical, supervised by staff signature. No issues highlighted through on reports.

Daily monitoring by staff of pest activity record F02/SSOP-01, no any pest infestation record, sign by Luu – Production manager.

Staff certificate of Nguyen Van Tuan who responsible supervises on pest was trained cert no 17179 dated 14/5/2016 reviewed.

Depth survey quarterly, last on 20/5/2018 by VFC sub contractor, with recommend control food waste at canteen. Trend annually on date 20/07/2018 by internal trained staff (staff trained on 12/5/2018 by VFC service).

4.15 Storage facilities

Control by GMP-03, rev.01, dated 12/4/2018 procedure to ensure FIFO to monitoring inventory product and packaging. Packaging stored in separated warehouses, clearly identification; separated stacking and protected in clean condition. All lot were clearly identified and segregated on plastic pallet and managed by indicated locations. Adequate space was arranged to enable FIFO control.

All vacuum finished product storage in dry, plastic pallet, ambient temperature area.

All warehouse secured by locked, controlled by nominated person.

No stored outside and atmosphere required.

4.16 Dispatch and transport

Control by GMP13, rev.01, date 2/4/2017: Loading & Delivery procedure. All finished product loading at Hoang Son I storage. Delivery by Hoang Phuc Minh – contract no 01/HPM-HS2018

Record before loading on F02-GMP13 have maintained: dated/ container no./ contract no./ port delivery/ item checking/ standard/ acceptable limit/ result of cashew nut kernel, name WS, total 700 cartons, product lot NĐ-HANH03+04/0113, conclusion of hygiene condition inspection, external, interior checking, dent on panel, gouge on floor, strange stain on floor or panel... confirmed, shipping container TRHU2599746 detailed and seal number K3660170.

No loading/unloading during audit.

Details of non-applicable clauses with justification

Clause reference	Justification
4.2.3	No external storage tanks, silos or intake pipes with external opening.
4.2.4	N/A
4.3.5 & 4.3.6	No high-risk areas & high-care area
4.3.7	No ambient high-care areas

4.3.9	No temporary structures constructed
4.4.4	No high-care defined
4.4.13	No high-risk areas
4.5.3	No legislation that specifically permits the use of water which may not be potable for initial cleaning.
4.7.5	No high-risk and high care maintenance
4.8.5	No high-care areas defined
4.8.4	No high-risk areas
4.9.4.1	No products packed into glass or other brittle containers
4.9.4.2	
4.9.4.3	
4.10.6.1 & 4.10.6.2	No products packed into glass jars, cans or other rigid containers
4.11.7.1 & 4.11.7.2 & 4.11.7.3	No CIP
4.13.1	Surplus customer-branded products and no products for animal feed
4.13.2	Surplus customer-branded products and no products for animal feed
4.13.3	Surplus customer-branded products and no products for animal feed
4.14.3	N/A
4.15.4	No controlled atmosphere is required
4.15.5	No outside storage

5. Product control

5.1 Product design/development

Only one kind of product is cashew. No significant change in products and materials, little new product variations other than change of raw materials as HACCP cashew kernel, approved by Ta Quang Huyen/ Director, dated 20/5/2018. Only 100% cashew kernel on finished product.

No other ingredients on product. When customer request new product, recipe and sample of products must be approved by HACCP team leader and customers. Expired product has been tested to ensure product safety, legality and quality throughout the shelf life. 6 months' frequency in the same condition as finished product ambient temperature stored. Recorded on sensory, microbiological (TPC, E.Coli, Salmonella) of Cashew kernels W240, assessment by VINACONTROL lab been verified found satisfaction.

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5.2 Product labelling

Carton artworks approved by customers (if requirement) per contract have been kept on file. Carton of finished product with name of product specified, lot number, production day, expiry date. Checked in store of Master carton with name of product, grade, lot number, production day, expiry date. Checked in storage of Cashew kernels, W320, production date 11/10/2018 found to comply applied legal requirement and internal specification: Information should be declared on label and customer importing regulation no claim of nutritional of the product label because the product is not sold to end consumer, it is used by processing plant.

5.3 Management of allergens

Allergen onsite only: Cashew kernel.
Allergen procedure control on HS-TT17, rev.01 dated 22/5/2018 has been established. Risk assessment about allergen was conducted and included in matrix BM02-TT17 analysis date 2/3/2018. Production have been considered to cleaning tool, protective clothes, utensil ...based on the relationship matrix of products and allergen materials contained, appropriate handling of allergen materials at all steps (receiving, storage, transfer, prepared, labelling...). Prerequisite SSOP06 personal hygiene and SSOP08 visitor, rev.01, dated 22/5/2018 about personal hygiene request that food is not allowed to be taken to locker room and into production.
No rework used.

5.4 Product authenticity, claims and chain of custody

Any news and Information relating to the adulteration or substitution of cashew nut provided from the VINACAS Association. QA dept. is responsible to regular update and access information relating adulteration of product.
Vulnerability assessment documented on HS-HACCP-01 and DANH GIA TON THUONG on date 22/7/2018. Cashew kernel buying direct from only one supplier approved. Risk of soaking in water, foreign matter mixing into raw cashew (increase weight purposed) including in HACCP study. Inspection at receiving step strictly to control

Recording has been identified: original of kind raw material/ nature of R.M/ physical form/ potential adulterant/ type of fraud/ like hood of occurrence/ like hood of detection/ level of risk/ control measure were seen. All raw cashew nut buying direct from supplier approved. Risk of soaking in water, foreign matter mixing into raw (increase weight purposed) including in HACCP study. Inspection at receiving step strictly to control.

Mass balances were tested annually on traceability practice.
No specific claim on product

5.5 Product packaging

All packaging suppliers have been approved. Packaging stored warehouse, on shelf, clear identification maintained through process and COA kept on file. Packaging is stored in the separated warehouse with raw material & finished product storage.

PA, PP bags of cashew kernel product had migration certificates and had been tested for use by supplier and verified annually by site. Eg.: PA/PE of Tan Huong supplier, tested report KT3-00738AHD8/1 following EC 1895/2005/EC, migration in acid acetic < 5µg/ml, in KMnO4 <1 µg/ml, dry residue in heptan, ethanol, water and acid acetic absent, Pb, Cd not detected.

Not contact liners with product were seen. Contract with packaging suppliers state clearly that no staples or similar metal risk is accepted from packaging material, including carton box.

Packaging materials are visual checked recording on date 4/7/2018 lot TANHUONG0407 received with kind of packaging/ clean/ tear/ filling on form reviewed.

5.6 Product inspection and laboratory testing

5.6.1 Product inspection and testing

No laboratory on site. Internal inspection including: moisture, broken, foreign mater, damaged kernels, chalky kernel.... *Microbial*, pesticides and heavy metal in cashew kernel product; swab surface contact direct food, tool, equipment contracted with accredited lab (Y TE CONG CONG, Vinacontrol...) to testing. Schedules date 2/1/2018 with position sample/ frequency/ parameter defining.

Ongoing shelf-life assessment included on schedule testing above. Every 6 months, the samples were checked for shelf-life assessment. Record for Cashew kernels W240, production dated 5/1/2017, test organoleptic, microbial product found satisfaction to schedules.

Verified report # 18G04ND05431 date 16/5/2018 of VINACONTROL lab – Vilas 238: Foreign matter <0.03%; Insect damage 0.5%; Moisture content 3%; Peroxide not detected; Heavy metal As, Pb, Hg, Cd: not detected; Pesticide: not detected; Aflatoxin B1, B2, G1, G2 absent; total TPC 60 CFU/g; Salmonella absent; Escherichia coli absent; Coliform <= 10CFU/g Yeast and Mould 6 CFU/g; Clostridium absent; Phosphine residue absent report 18G04HX060980-03

Testing result of pesticides residue of cashew kernel verified: Eg.: result on pesticides # 18G04HX04006-05 full complied scheduled. Aflatoxin B1 report # 18G04HX06499-02; Fumigation report # 18G04HX06980-05. Heavy metal report 18G04HX060980-04

5.6.2 Laboratory testing

No laboratory at site.

Accredited external labs used are certified ISO 17025. Microbial, chemical & pesticides testing is conducted by external laboratory which have been accredited ISO 17025 according to verification plan, the assessment of laboratory method, ratio trend analysis was applied every year on external service centre, last done by QA department supplier evaluated time. Company use the charts of test results identify the trends and anomalous results at every 12 months as plan interval, last reviewed on Mar 2018 as VE SINH CONG CONG Lab, CAFECONTROL, VINACONTROL, SGS.

5.7 Product release

After internal inspection completed, depend to customer requirement, each shipment must be released by 3rd on microbial, fumigation of product, fumigation of container, aflatoxin] (VINACOTNROL, CAFECONTROL...) prior shipping if required by market. Report has been initialled and then QA Manager confirmed and submits to Vice Director for approval each lot.

Onsite verified finished product, production date, checked on release product WW320 packing 1 x 50-pound net on sale contract no 0223, customer JIANSU, total 700 cartons (15.876 kg net), fully complied with contracted. Bill loading approved by Ta Quang Huyen/Director fully complied with procedure.

No products are held off site.

Details of non-applicable clauses with justification

Clause reference	Justification

5.1.3	Trials are not necessary for the product(s) produced
5.2.3	No specific claim or nutritional claim
5.2.4	No customers or nominated third party responsible for label information
5.3.5	No rework used or reworking operations carried out
5.3.6	No specific claims on regarding the suitability of a food for allergy
5.3.7	No claims made regarding suitability for allergy or food sensitivity sufferers
5.4.3	No particular risk of adulteration of raw material
5.4.4	No claims made on finished products which are dependent on a status of the raw material
5.4.5	No claims made about the methods of production
5.4.6	No claim made
5.6.2.1	No laboratory in side.
5.6.2.2	

6. Process control

6.1 Control of operations

Completely instructed in GMP-0x, rev.01, dated 22/4/2018, fully recorded includes: insect damage kernel, mould, rancid, oil, Testa, root spot, decay, adhering dirt, broken, spot led, scorched, scrape, deep scorched, light yellow, deep yellow, light blemished, dessert, moisture of Cashew (every lot), vacuum packing, gauges of magnets, foreign mater, scale tare checks (30 minutes), weight control, label checks (every batch), and date coding checks (every batch) ...with detailed standards and frequency. Eg.: BM01-GMPx, date 11/10/2018: pcs/lb/ broken kernel/ moisture, yellow, sensory... filled signed by QC staffs and operators. In the case of equipment failure or deviation of the process from specification, QC online noted to engineering department and product applied quarantine, treatment as HS-TT-04, rev. 01: non-conformity procedure.

6.2 Labelling and pack control

Control by GMP-12, rev.01, date 22/4/2018. Packaging in used check at the start up, every packaging change, and 30' minutes interval during of packing, confirmation of right packaging.
Record on BM-GMP14 with time checking/ label / kind of product/ lot/ dated verified by QC supervisor online on product WW240 cashew nut kernel, production date 10/10/2018. There is only one kind of product (kernel cashew nut) and no product change over.
Hygiene, cleaning... check before change over commencing production. Only PP/PA bag specified as Shipping Instruction online available on packing area.

6.3 Quantity, weight, volume and number control

Control process by GMP-13, rev.01, dated 22/4/2018. Specific in contract with customer. Net, gross

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weight for each product lot depends on customer requirement. Supervise checking quantity/ volume of processing recorded on BM-GMP-16 reviewed.

All inspections of weights and sensory are record on file.

All bag finished product checked weights after packing one by one. Method checking complied with 76/211/EEC.

No automatic reject systems are in place; no products are sold in bulk.

6.4 Calibration and control of measuring and monitoring devices

Measuring Control procedure HS-TT14 date 22/5/2018.

Moisture devices calibration report KT3-2416AHK on valid Aug 2019;

Electronic balance calibration report B541/266 & 539/266 valid May 2018.

MIG thermometer calibration CT07189254 valid to Apr 2019

Details of non-applicable clauses with justification

Clause reference	Justification
6.2.4	No on-line vision equipment used to check product labels and printing
6.3.2	No bulk quantities packed

7. Personnel

7.1 Training: raw material handling, preparation, processing, packing and storage areas

Defined in Human Resource Procedure HS-TT-11, rev.01, dated 22/5/2018. All new employees training SSOPs, GMPs start working. Workers control CCP's must be pass examination trained course CCP control. Refreshment training annually.

Training Plan 2018 on BM06-TT11, date 5/2/2018 includes courses: GMPs, SSOPs, CCP, fire with content training/trainer/ Objective training/ time defining. Eg.: Listed of training on allergen date 13.07.2018 of all employees, trainer of Tran Thi Tuyen/Le Huu Nam has been reviewed.

Competency Management requirements are defined per position, including key personnel, CCP Operators and Inspectors, and contractual employees: Educational requirements; Skills, Training and applicable work experience. Operators/employees responses for CCPs monitoring have been trained HACCP plan. The effectiveness of training reviewed with skill working/ quantity & time finished working/ complied of regular of work ... was seen. Latest update training on food safety date 30/07/2018 (valid three years)

- CCPs, oPRP training record BM07-TT11, on date 11-14/7/2018 of all employees

7.2 Personal hygiene: raw material handling, preparation, processing, packing and storage areas

Defined in Personnel Hygiene Procedure SSOP05, rev.1, dated 22/5/2018 Communicated by initial training and refresh training, all requirements of personnel hygiene are established: Ex.: The Jewellery is not allowed bring to production area, not accepted long nail, the smoking is not allowed in this factory only at designed with tray is available....

They have system is in place to monitor especially for inside processing area by assigned staff. Each entrance way production area install Stations with along with liquid soap/ clean water/ dryer hand/ gloves/ alcohol supply and monitoring by dedicated staff which cannot be avoided included supervise open wound.

Situation sanitation daily recording on Daily personal hygiene checking record F01-SSOP05 date May 2018 was verified with dated/ personnel hygiene checking/conclusion reviewed.

Open wound not permit to production area. In case of cuts or grazes on expose skin, the worker is not allowed to work in production any more.

Hand worker swab tested on report no 019577/VYTCC/VN on Ta Van Chuyen of Salmonella, E.Coli.

Metal detectable plasters are checked by metal detector and records in place Bien Ban Thuc Nghiem date 3/5/2018.

Hand cleaning 4 hour performed during production at defined on SSOP05, rev.1, dated 22/5/2018 prerequisite program. Drugs only provided by the company nurse and should be using it at medical room, not allow taking any drug out or keeping in locker room.

7.3 Medical screening

Control by Personnel Hygiene Procedure SSOP06, rev.1, dated 22/5/2018. Yearly screened health checked employees at storage & production area as Circular #21/2007/BYT-Vietnam regulation (Health Condition of Employees working in food scope). Last screened as report date 8/6/2018 by Binh Phuoc Medicine Hospital. Report of all employees in production area verified and followed Decision No 14/2013 issued dated 6/5/2013 by ministry of health of Vietnam. None cases infection has been noted on analysis for improvement record.

Company also training for employee and by check list visitor and subcontractor, for the new worker, the training is also provided and documented relating to action to be taken where they may be suffering from or have been in contact with an infectious disease.

All visitors must be Health Declared on F01/SSOP.08 before entrance production and storage. Daily noted open wound and sign of illness on noted by Medical health room. All employees should be declared information health before returning to continuous working

7.4 Protective clothing: employees or visitors to production areas

No high-risk/high care and ambient high care areas in the factory. Protective clothing includes coat and trouser, hair net, mask, boot provided to all production staff. Protective clothing is removed on leaving the production/storage areas.

Protective clothing is cleaned daily by laundering in-house with QC control, no third-party. Laundering instruction documented, implemented, visual check records verified. Swab test for protective clothing performed every monthly. Eg. Test result No. 019582/VYTCC/CN on date 29/8/2018 for TPC, salmonella verified.

Laundering process documented eg. Temperature, detergent, dry process... Visual inspection performed after laundering and recorded. Laundry included in the internal audit program. Protective clothes included in swabbing 12 months testing TPC, E.Coli, Coliform as scheduled.

Details of non-applicable clauses with justification

Clause reference	Justification
7.2.3	Cuts and grazes are not permitted in production area and warehouse. These cases shall be removed from production area and warehouse so plaster is not used
7.2.4	N/A
7.4.4	No high-risk areas
7.4.6	N/A. No gloves used

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7.4.7	N/A
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Module 15 FSMA Preventive Controls Preparedness Module Version 2 July 2018				
Item no.	Clause	Module item	Conforms (Y/N) or (NA)	Comments
1	15.1.1	Handwashing areas, dressing and locker rooms, and toilet rooms must have adequate lighting.	Y	Observed at hand washing area, locker room, changing room have adequate lighting
2	15.1.2	Water distribution system must prevent backflow from, or cross-connection between, piping systems that discharge waste water or sewage.	Y	Water no used on cashew kernels process. Only using water for washing hand as water distribution plan by tape numbered as water map identified, no water back flow by one way valve cut-off. Water is sourced from Binh Phuoc Municipal supply. Result testing input of water on 153/KSBT-XN, date 12/6/2018 by complied with National technical for potable water Vietnam regulation on microbial & chemical parameters. No air using at packing step.
3	15.1.3	All food contact surfaces of plant equipment and utensils used in manufacturing, processing, packing, or holding food must be corrosion resistant. Seams on food-contact surfaces must be smoothly bonded or maintained so as to minimize accumulation of food particles, dirt, and organic matter and thus minimize the opportunity for growth of microorganisms and allergen	Y	Most contact surface of production and packaging were stainless steel, and kept well. Equipment have been constructed of stainless steel such as sieves, sorter, hopper, 09 optical sorters, 04 system magnets, 30 Dryers, 8 room fumigants, 2 X – Ray, 2 metal detection... machines have been installed. Main equipment of conveyor

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		cross-contact.		systems around 3 years under routine maintenance systems. Well positioning and placing for all equipment. Food contact made of suitable materials
4	15.1.4	Ice used in contact with food must be manufactured in accordance with Good Manufacturing Practice (GMP) requirements of 21 CFR 117.	N/A	No ice used
5	15.1.5	Where defect action levels (DAL) are established for a food, quality control operations must reduce defects to the lowest level possible. Defect levels rendering the food adulterated may not be reduced by mixing the food with another lot.	Y	Follow Sampling procedure. Specification of finished product. NC product handling procedure. DAL established for filthy insect fragment. DAL source established from FDA site with guideline Hazard analysis and risk-based Preventive control for Human food.
6	15.1.6	The hazard analysis must additionally identify and evaluate the following known or reasonably foreseeable hazards, which are associated with the food or facility: <ul style="list-style-type: none"> • Economic adulterants which affect food safety • Environmental pathogens where ready-to-eat (RTE) food is exposed to the environment prior to packaging and the packaged food does not receive a kill step • Radiological hazards • Unintentional adulterants which affect food safety 	Y	No applicable for radiological step. Mentioned in food safety plan HS-HARPC plan on date 20/5/2018 cashew nut kernel. Economic adulterant such as sulphite and foreign matter made weight, QC inspect at incoming step. Product is not RTE. Intend use: food industries and fully cooked before eat.
7	15.1.7	All identified known or reasonably foreseeable hazards must be evaluated to determine “hazards requiring a preventive control” (i.e., significant hazards).	Y	The reasonably foreseeable hazards such metal and foreign bodies have been analysed and evaluated, result say no significant hazards due to supplier ‘s guarantee and bought within approved supplier list.
8	15.1.8	Establish one or more preventive control(s) for each identified	Y	Process preventive controls: incoming inspection of raw

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		“hazard requiring a preventive control” (i.e., significant hazard) such that the control significantly minimizes or prevents the food manufactured, processed, packed, or held by the facility from being adulterated under section 402 of the Federal Food, Drug, and Cosmetic Act or misbranded under section 403(w) of the Federal Food, Drug and Cosmetic Act.		material, metal control, fumigation and allergen preventive control Sanitation preventive control Supplier preventive control.
9	15.1.9	<p>Evaluate and update the recall and withdrawal procedure as necessary to ensure it contains procedures and responsibility for the following:</p> <ul style="list-style-type: none"> • Notifying consignees of how to return or dispose of recalled product • Conducting effectiveness checks to verify recall is carried out • Appropriate disposal (i.e., destroy, divert, repurpose) of recalled product 	Y	The latest test on 25/7/2018 for lot Cashew kernels ND-HANH03/0113, client August, W240, 15,876 kg, production date 13/7/2018 has been selected, small size supposed. Communication to customer by email was tested, and relevant information reported that 15.876kg of finished product from raw cashew lot as above, supplier TRAN THI BICH HANH have been fully traceable. Total time of traceability and recall decision is 1h40'. Detailed delivery and quantity have been reply one day after. Refer to the mock test, there is no further improvement required. No recalls from last 12 months.
10	15.1.10	Establish monitoring activities and a written procedure for each preventive control consistent with the requirements of BRC section 2.10.	Y	There are 1 CCPs: - CCP: Fe – 1.5 mm, Non-Fe 1.8 mm, SUS 2.2 mm, glass 2.5 mm, ceramic 3.0 mm. Samples tested every hour
11	15.1.11	<p>Establish corrective action procedures when preventive controls are not implemented consistent with the requirements of BRC sections 2.11 and 3.7.</p> <p>Corrective action procedures must be established and implemented when the presence of a pathogen (or indicator organism) is detected</p>	Y	Defined in Corrective action procedure HS-TT05, rev.01, dated 21/5/2018 which was clearly step should be complying such as: recorded non-conformity, analysis root cause, corrective action and prevent occur and verified. Record keeping follow as Record Control Procedure

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		as a part of verification activities (i.e., product testing and/or environmental monitoring).		HS-TT-02
12	15.1.12	<p>Validate all established process controls prior to implementation of the food safety plan, upon changes requiring re-validation or within 90 calendar days of the first food production.</p> <p>Validate allergen, sanitation and supply-chain controls as appropriate to the nature of the hazard, control and facility.</p>	Y	<p>Validation of CCP1: results have been demonstrated that hazard of annually calibration of all metal detectors. Calibration have been included the testing with metal (Fe – 1.5 mm, Non-Fe 1.8mm, SUS 2.2 mm, glass 2.5 mm, ceramic 3.0 mm) samples, inserted in products with identification mark on packaging by ANCO. Record AC0818223 on date 30/8/2018 reviewed.</p>
13	15.1.13	<p>The PCQI (or authorized designee) reviews monitoring and corrective action records within 7 days. Where an alternate timeframe exceeding 7 days is used, the PCQI must document justification.</p> <p>The PCQI (or authorized designee) reviews verification records for all preventive controls (e.g., calibration records, product testing, supply-chain audits) within a reasonable timeframe after the record is created.</p>	Y	<p>The PCQI have reviewed the verification records for all preventive controls (e.g., calibration records, product testing, supply-chain audits) within 3 days after the record has been created.</p>
14	15.1.14	<p>Where product testing for a pathogen (or indicator organism) or other hazard is used as a verification activity, a scientifically valid and written testing procedure must identify the following:</p> <ul style="list-style-type: none"> • Sampling procedure to include method, quantity, frequency, and number of samples • Analytical method • Laboratory conducting analysis • Corrective action procedure where pathogen is detected 	Y	<p>Verified report # 18G04ND05431 date 16/5/2018 of VINACONTROL lab – Vilas 238: Foreign matter <0.03%; Insect damage 0.5%; Moisture content 3%; Peroxide not detected; Heavy metal As, Pb, Hg, Cd: not detected; Pesticide: not detected; Aflatoxin B1, B2, G1, G2 absent; total TPC 60 CFU/g; Salmonella absent; Escherichia coli absent; Coliform <= 10CFU/g Yeast and Mould 6 CFU/g; Clostridium absent; Phosphine residue absent.</p> <p>Testing result of pesticides residue of cashew kernel verified: Eg.: result on</p>

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				pesticides # 18G04HX04006-05 full complied scheduled. Aflatoxin B1 report # 18G04HX06499-02; Fumigation report # 18G04HX03701-04
15	15.1.15	<p>Where environmental monitoring for a pathogen (or indicator organism) is used as a verification activity, a scientifically valid and written testing procedure must identify the following:</p> <ul style="list-style-type: none"> • Adequate number and location of sample sites • Timing and frequency of sampling • Analytical method • Laboratory conducting analysis • Corrective action procedure where pathogen is detected 	Y	<p>Interlock of doors between raw area and production. Swab site locations which shall include the most critical location and are dependent upon such criteria as the material produced, equipment design, plant structure, traffic patterns, and previous findings</p> <p>In the event of a pathogen-positive result the QA and production and lab part shall conduct an investigation to identify the potential source and document all corrective actions. If multiple sites were composited (pooled), then re-sample after a positive to potentially find the single positive site. Corrective action plans shall be initiated as soon as practically feasible. Corrective action may include improved cleaning or sanitation, redesign of the structure or equipment, improved GMPs, redefined traffic patterns</p>
16	15.1.16	Devices used to verify preventive controls must be calibrated.	Y	<p>Measuring Control procedure HS-TT14 date 22/5/2018. Moisture devices calibration report KT3-2416AHK on valid Aug 2019; Electronic balance calibration report B541/266 & 539/266 valid May 2018</p>
17	15.1.17	<p>Identify a Preventive Controls Qualified Individual (PCQI) responsible for developing the food safety plan, validating preventing controls, review of records, and reanalysis of the plan.</p> <p>Document the PCQI's training and</p>	Y	The HACCP team, comprised 06 members, have collected from multi-disciplinary: Production, QC, Sale, maintenance. Steering Committed # 01/QD-HACCP, date 20/05/2018, approved by Ta Quang Huyen/

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		qualification via job experience.		Director. The certificate of Huynh Thanh Cong/ team leader – HACCP Codex & Method analysis risk course on 12-14/7/2017 has been kept on file, he has over 7 years' experiences in nut cashew industries PCQI training record by Le Thi Van– cert no f23b85df
18	15.1.18	All records required by 21 CFR § 117 must include: <ul style="list-style-type: none"> • Date and time of activity being documented • Signature/ initials of individual performing activity or conducting record review • Information to identify the facility (e.g., name and location) • Identity of the product and lot code where applicable 	Y	Trace backward from on contract no 0223, customer JIANSU on finished product cashew nut kernel code W320, total 680 cartons as 15,422.4 kg product lot no ND-HANH04/0233, shipping date 13/7/2018, production date 1/7/2018, supplier TRAN HONG HANH, lot raw cashew no NDHANH04, packing lot no KOP1306. Trace test completed within 2.0 hours. No rework applied
19	15.1.19	The owner, operator or agent in charge of facility must sign and date the written food safety plan initially and then upon any changes following reanalysis.	Y	The QA manager of the site have signed and dated the written food safety plan, Mr. Huynh Thanh Cong
20	15.1.20	All documents and records relating to the food safety plan (i.e., all records required by 21 CFR § 117) must be retained at the facility for 2 years after the record is created. Where records are stored offsite, they must be retrievable within 24 hours with the exception of the food safety plan, which must remain onsite.	Y	All records related product and process performances retained in 3 years (1 year of shelf life plus one year) as mentioned in quality manual/ record control procedure HS-TT02 (rev 01, issued date 22/5/2018) HARPC food safety plan defined.
21	15.1.21	Where a hazard requiring a supply-chain-applied control is identified in the hazard analysis, the receiving facility must establish and implement specific supplier approval and verification activities. Where a hazard requiring a supply-chain-applied control is identified AND the control is applied by an entity other than the receiving facility's supplier, the receiving facility is responsible for verifying implementation of the	Y	Suppliers Approval Procedure HS-TT-07, rev.01, dated 21/5/2018. Assessment criteria accordance to checklist BM04-TT07 included criteria: quality, control process, price, time delivery, service after delivery Every supplier must be over > 70 marks are accepted (maximum total criteria 100 marks). List suppliers approved on BM05-

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		control.		TT07, dated 05.06.2018 included: 01 packaging as Tan Huong, KOP carton, 01 service (transportation as Hoang Phuc Minh), cashew kernel (Tran Thi Hanh, Le Thi Tham, Pham Duy Quang supplier) material with name supplier/ address/ kind of supply/ dated of audit/ approved has been reviewed. On-going assessment for Supplier of carton based on questionnaire
22	15.1.22	Supplier approval must be documented before receiving and using raw materials and ingredients. Verification activities must be conducted before receiving and using raw materials and ingredients on a temporary basis from unapproved suppliers.	Y	List suppliers approved on BM05-TT07, dated 05.06.2018 included: 01 packaging as Tan Huong, KOP carton, 01 service (transportation as Hoang Phuc Minh), cashew kernel (Tran Thi Hanh, Le Thi Tham, Pham Duy Quang supplier) material with name supplier/ address/ kind of supply/ dated of audit/ approved has been reviewed. On-going assessment for Supplier of carton based on questionnaire. <ul style="list-style-type: none"> - 3rd party certification (require GFSI recognised scheme) - Or if not certified, onsite audit (score pass 70%) - Supplier questionnaire
23	15.1.23	One or more supplier verification activities (defined in § 117.410(b)) must be conducted for each supplier before using raw materials and ingredients AND periodically thereafter at an adequate frequency.	Y	Risk assessment implemented all kind of material of all suppliers on 22/07/2018 part of HARPC plan. Record of audited supplier reviewed, including 01 approved suppliers of cash kernel, 02 packaging (PA, carton). Raw cashew kernel material from source Tran Thi Hanh, Le Thi Tham, Pham Duy supplier included traceability on site on the same dated. Service

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				<p>suppliers (Fumigation – VFC evaluated date 31/5/2018, transportation on date 30/05/2018 & testing, inspection service Vinacontrol), hazardous waste signed by Mr. Ta Quang Huyen/Director are available reviewed. The QA manager and Sale Department will be ongoing assessment every year to approve suppliers. No outsource processes applicable.</p>
24	15.2.1	<p>Human food by-products held for distribution as animal food must be held under conditions that will protect against contamination, including the following:</p> <ul style="list-style-type: none"> - During holding, human food by-products for use as animal food must be accurately identified. * Labeling that identifies the product by the common or usual name must be affixed to or accompany the human food by-products for use as animal food when distributed. * Shipping containers (e.g., totes, drums, and tubs) and bulk vehicles used to distribute human food by-products for use as animal food must be examined prior to use to protect against the contamination of animal food from the container or vehicle when the facility is responsible for transporting the human food by-products for use as animal food itself or arranges with a third party to transport the human food by-products for use as animal food. 	N/A	Product is not for animal foods.
25	15.3.1	<p>A Qualified Individual (QI) is responsible for developing the site's food defense plan, conducting a vulnerability assessment, identifying mitigation strategies, and conducting a reanalysis of the plan. The QI responsible for developing the food defense plan shall be identified on</p>	Y	The PCQI is Le Thi Van – cert no f23b85df responsibility for food defence plan was described in food safety plan

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		<p>the site's organizational chart.</p> <p>One or more QI's shall be responsible for implementing mitigation strategies at actionable process steps.</p>		
26	15.3.2	<p>The site shall have a written food defense plan, which includes the following:</p> <ul style="list-style-type: none"> • A vulnerability assessment identifying significant vulnerabilities and actionable process steps • Mitigation strategies appropriate to reduce the vulnerability • Procedures for food defense monitoring, corrective action and verification 	Y	<p>Defined in Security and Food Defence Procedure HS-TT-16, rev.01, date 22/5/2018. Visitor and subcontractor must be identifying "Visitor" card & declaring information before entrance main gate & confirm by Security to office accepted. Employees with ID card showed. Enclosed site within 24-hour security. Security risk management is applied and at Cashew kernel raw material receiving, packaging is locked and restricted. Production area is only authorised staff have access. Packing room & storage product is separated area authorised person. Base on risk assessment documentation and defined in the security procedure P24, reviewed annually. All staffs were trained on security policy and procedure when recruited.</p>
27	15.3.3	<p>A written vulnerability assessment shall be prepared for each food type manufactured, processed, packed, or held, which evaluates the following key criteria (at a minimum):</p> <ul style="list-style-type: none"> • Scale and severity of threat if a contaminant is added to product • Degree of physical access to the product • Ability of an attacker to successfully contaminate product—including consideration of an inside attacker <p>A vulnerability assessment shall be documented for each food type regardless of the outcome and provide justification as to why each</p>	Y	<p>Defined in Security and Food Defence Procedure HS-TT-16, rev.01, date 22/5/2018. Visitor and subcontractor must be identifying "Visitor" card & declaring information before entrance main gate & confirm by Security to office accepted. Employees with ID card showed. Enclosed site within 24-hour security. Security risk management is applied and at Cashew kernel raw material receiving, packaging is locked and restricted. Production area is only authorised staff have access. Packing room & storage product is separated area authorised person.</p>

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		point, step or procedure in the operation was or was not identified as an actionable process step.		Base on risk assessment documentation and defined in the security procedure P24, reviewed annually. Last review on date 11/7/2018 is in place and implemented well, record BM01-TT16. All staffs were trained on security policy and procedure when recruited.
28	15.3.4	<p>Written mitigation strategies shall be established and implemented for each actionable process step identified in the vulnerability assessment.</p> <p>Justification shall be documented explaining how the strategy significantly minimizes or prevents the vulnerability.</p>	Y	<p>Defined in Security and Food Defence Procedure HS-TT-16, rev.01, date 22/5/2018. Visitor and subcontractor must be identifying "Visitor" card & declaring information before entrance main gate & confirm by Security to office accepted. Employees with ID card showed. Enclosed site within 24-hour security. Security risk management is applied and at Cashew kernel raw material receiving, packaging is locked and restricted. Production area is only authorised staff have access. Packing room & storage product is separated area authorised person. Base on risk assessment documentation and defined in the security procedure P24, reviewed annually. Last review on date 11/7/2018 is in place and implemented well, record BM01-TT16. All staffs were trained on security policy and procedure when recruited.</p>
29	15.3.5	<p>Written monitoring procedures shall be established and implemented to include the activity and frequency for monitoring food defense mitigation strategies.</p> <p>Procedures shall include recordkeeping requirements for all monitoring activities.</p>	Y	<p>Defined in Security Procedure HS-TT-16, rev.01, date 22/5/2018. Visitor and subcontractor must be identifying "Visitor" card & declaring information before entrance main gate & confirm by Security to office accepted. Employees with ID card showed. Enclosed site within 24-hour security. Security risk management is applied and at Cashew kernel</p>

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				<p>raw material receiving, packaging is locked and restricted. Production area is only authorised staff have access. Packing room & storage product is separated area authorised person.</p> <p>Base on risk assessment documentation and defined in the security procedure P24, reviewed annually.</p> <p>All staffs were trained on security policy and procedure when recruited.</p> <p>Last review on date 11/7/2018 is in place and implemented well, record BM01-TT16, checklist as FDA food defence guidance applied.</p> <p>Mitigation strategies clear defined on procedure:</p> <p>Identified potential risk - outer site and inner site as physical security, employee, visitor, driver and contractor, food processing area, storage, water tank, raw material, finished goods, chemical. Designate parking areas for personnel and visitors, and distinguish vehicles. Implement a policy for driver check-in and vehicle documentation review.</p> <p>Security measures during elevated threat/risk levels random security checks of personnel, equipment and processes.</p> <p>Visitor policy which requires proper identification.</p> <p>Emergency response procedures including preventing security breaches during evacuation</p> <p>Locks, fencing, gates or other physical barriers at perimeters, entry/exit points, locations and operations to restrict access</p> <p>Frequency review yearly by QA team.</p>
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30	15.3.6	<p>Written corrective action procedures shall be established and implemented when mitigation strategies are not properly implemented. The procedure shall include the following criteria:</p> <ul style="list-style-type: none"> • Method for identifying and correcting a lack of implementation • Method for reducing the likelihood of recurrence • Recordkeeping requirements for corrective actions 	Y	<p>Corrective action procedure HS-TT05, rev.01, dated 21/5/2018 which was clearly step should be complying such as: recorded non-conformity, analysis root cause, corrective action and prevent occur and verified. Record keeping follow as Record Control Procedure HS-TT-02</p>
31	15.3.7	<p>Written verification procedures shall be established and implemented to ensure that food defense monitoring and corrective action are performed according to procedures. Verification procedures shall describe activities to verify implementation of mitigation strategies.</p> <p>Verification procedures shall include:</p> <ul style="list-style-type: none"> • A review of monitoring and corrective action records within an appropriate timeframe (e.g., 7 days) • Other verification activities as appropriate (e.g., internal audit) • Method for verifying that reanalysis of the food defense plan was conducted • Frequency for verification activities • Recordkeeping requirements of all verification activities 	Y	<p>Verification annually take into account: HACCP, HARPC food safety plan, internal audit, food defence, testing and record keeping as procedure.</p>
32	15.3.8	<p>Reanalysis of the food defense plan shall be documented and performed every three years or whenever</p> <ul style="list-style-type: none"> • A change in facility operations which creates a new significant vulnerability • Knowledge about a new threat applicable to the 	Y	<p>Security Procedure HS-TT-16, rev.01, date 22/5/2018. Visitor and subcontractor must be identifying "Visitor" card & declaring information before entrance main gate & confirm by Security to office accepted. Employees with ID card showed. Enclosed site within 24-hour security</p>

		<p>food or facility becomes known</p> <ul style="list-style-type: none"> Mitigation strategies are not implemented as intended FDA requires reanalysis based on new threats or scientific evidence 		
33	15.3.9	<p>All records required by 21 CFR § 121 must include:</p> <ul style="list-style-type: none"> Date and time of activity being documented Signature/ initials of individual performing activity or conducting record review Information to identify the facility (e.g., name and location) Identity of the product and lot code where applicable 	Y	<p>All records related product and process performances retained in 3 years (1 year of shelf life plus one year) as mentioned in quality manual/ record control procedure HS-TT.02 (rev 01, issued date 22/5/2018) HARPC food safety plan defined.</p>
34	15.3.10	<p>The owner, operator or agent in charge of facility must sign and date the written food defense plan initially and then upon any changes following reanalysis.</p>	Y	By QA and BOD
35	15.3.11	<p>All documents and records relating to the food defense plan (i.e., all records required by 21 CFR § 121) must be retained at the facility for 2 years after the record is created. Where records are stored offsite, they must be retrievable within 24 hours with the exception of the food defense plan, which must remain onsite.</p>	Y	<p>All records related product and process performances retained in 3 years (1 year of shelf life plus one year) as mentioned in quality manual/ record control procedure HS-TT.02 (rev 01, issued date 22/5/2018) HARPC study defined.</p>
36	15.4.1	<p>Vehicles and transportation equipment must be maintained and stored in a sanitary condition appropriate for the intended use to prevent food from becoming unsafe during transportation. Where inspection reveals that vehicles or containers are not in a clean condition, they shall not be used.</p> <p>A documented procedure shall describe cleaning and storage practices of all vehicles and transportation equipment maintained by the site whether</p>	N/A	<p>No contract with U.S shipper.</p> <p>No motor or rail transportation applied</p>

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		leased or owned and as appropriate for the intended use. The procedures shall be fully implemented. Cleaning activities shall be recorded.		
37	15.4.2	<p>The site shall ensure that contracts with U.S. shippers, receivers, loaders, and carriers specify their responsibility for compliance with FSMA's Sanitary Transportation rule. Where the site acts as the shipper or receiver, it shall ensure compliance with the rule.</p> <p>Responsibilities shall ensure transportation operations are conducted in a manner to prevent food from becoming unsafe during transport (i.e., apply controls) and that responsibility for compliance with the regulation is assigned to competent supervisory personnel.</p>	N/A	<p>No contract with U.S shipper.</p> <p>No motor or rail transportation applied</p>
38	15.4.3	<p>Where the site arranges transportation, it shall document sanitary design requirements and cleaning procedures of vehicles appropriate for the type of food to be transported. These requirements shall be communicated to the loader and carrier.</p> <p>Where the site does not arrange transportation, the above provision shall be documented in the shipping service contract to ensure the shipper documents sanitary specifications of vehicles for the loader and carrier, which are appropriate for the type of food.</p>	N/A	<p>No contract with U.S shipper.</p> <p>No motor or rail transportation applied</p>
39	15.4.4	Contracts with loaders shall specify that the loader is responsible for following sanitary specifications provided by shipper.	N/A	<p>No contract with U.S shipper.</p> <p>No motor or rail transportation applied</p>
40	15.4.5	Where the site receives temperature controlled product immediately following transportation, it shall conduct an assessment to determine whether the food was subject to temperature abuse.	N/A	<p>No contract with U.S shipper.</p> <p>No motor or rail transportation applied</p>
41	15.4.6	Contracts with carriers shall specify that the carrier is	N/A	No contract with U.S shipper.

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		<p>responsible for the following sanitary activities where agreed to in writing with shipper.</p> <ul style="list-style-type: none"> Sanitary condition of vehicles and transportation equipment Following shipper's sanitary specifications (including pre-cooling requirements where applicable) Recording compliance with operating temperature where critical to food safety Procedures for the use of bulk vehicles, which includes recording the previous cargo and most recent cleaning for the shipper 		No motor or rail transportation applied
42	15.4.7	<p>Contracts with carriers shall specify that the carrier implements a training program for all personnel engaged in transportation activities, which covers</p> <ul style="list-style-type: none"> Awareness of potential food safety problems that may occur during food transportation Basic sanitary transportation practices to address those potential problems Responsibilities of the carrier 	N/A	<p>No contract with U.S shipper.</p> <p>No motor or rail transportation applied</p>
43	15.4.8	<p>The site shall keep all records related to U.S. transportation operations and transportation service contracts as original or electronic records for a minimum of 12 months beyond termination of the activity or contract. Offsite records shall be retrievable within 24 hours.</p>	N/A	<p>No contract with U.S shipper.</p> <p>No motor or rail transportation applied</p>
44	15.4.9	<p>The recordkeeping policy shall ensure all sanitary design requirements and cleaning procedures for vehicles are maintained onsite and all offsite records are retrievable within 24 hours.</p>	N/A	<p>No contract with U.S shipper.</p> <p>No motor or rail transportation applied</p>

45	15.5.1	<p>Personnel (permanent and temporary) who handle produce or food contact surfaces must receive additional training on the following:</p> <ul style="list-style-type: none"> Principles of food hygiene and food safety <p>Produce safety standards applicable to an individual's job</p>	N/A	
46	15.5.2	<p>Personnel (permanent and temporary) who conduct harvest activities (including washing and cooling) must receive additional training on the following:</p> <ul style="list-style-type: none"> Recognizing produce contaminated with known or reasonably foreseeable hazards Inspecting harvest containers and equipment to ensure that they are clean, maintained and do not contaminate produce with hazards Correcting problems with harvest containers or equipment 	N/A	No harvest activities
47	15.5.3	<p>One or more supervisors or individuals responsible for the operation must have successfully completed food safety training equivalent to standardized curriculum recognized by the FDA.</p>	N/A	
48	15.5.4	<p>A supervisor shall be identified with responsibility for the operation and ensuring compliance with Produce Safety regulation. This individual shall be identified on the site's organizational chart.</p>	N/A	
49	15.5.5	<p>Personnel (permanent and temporary) shall avoid contact with animals or take measures such as hand washing and protective clothing to prevent contamination of produce and food contact surfaces following contact with worker animals.</p>	N.A	No worker on animal contact
50	15.5.6	<p>The water distribution system supplying agricultural water used for harvest, packing, holding—and associated equipment—shall be maintained, regularly inspected and equipment properly stored to</p>	N/A	

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		<p>prevent the system from being a source of contamination to produce and food contact surfaces. The system shall be inspected for conditions, which could introduce known or foreseeable hazards into or onto produce.</p> <p>Where testing of the water source or system inspection reveals contamination, deficiencies shall be corrected such as the repair of well caps or sanitary seals.</p>		
51	15.5.7	<p>Agricultural water treatment must be delivered and monitored at a frequency that ensures water is safe, of adequate sanitary quality, and meets the microbial quality criteria of no detectable generic Escherichia coli (E. coli) in 100mL.</p>	N/A	
52	15.5.8	<p>Potable water quality standards used shall ensure the microbial quality criterion is met, which is no detectable generic E. coli in 100 mL.</p>	N/A	
53	15.5.9	<p>Where agricultural water does not meet microbial quality criteria or is determined to be unsafe and not of adequate sanitary quality, water use must be discontinued along with treatment or other correction that reestablishes sanitary quality and microbial criteria.</p> <p>Where water treatment is not performed, re-inspection of the entire affected agricultural water system shall be conducted followed by the identification of conditions leading to the introduction of hazards into or onto produce or food contact surfaces, correction, and verification of correction to ensure water meets microbial quality criteria.</p>	N/A	
54	15.5.10	<p>Agricultural water testing may be performed by the site (or site representative) or by a third party provided representative samples of the site's water source is secured. Aseptic water sampling must be performed. The method of analysis for water testing is U.S. Environmental Protection Agency</p>	N/A	

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		(EPA), "Method 1603: Escherichia coli (E. coli) in Water by Membrane Filtration Using Modified membrane-Thermotolerant Escherichia coli Agar (Modified mTEC), EPA-821-R-09-007," December, 2009 or equivalent method.		
55	15.5.11	During harvest, packing and holding operations (e.g., hydrocooling, washing), manage water to maintain its safety and sanitary quality and prevent contamination of produce to include establishing and following a water-change schedule for recirculated water. Visually monitor the water quality of water used for harvest, packing, and holding activities for organic build-up (e.g., soil, plant debris). Maintain and monitor the temperature of water used for harvest, packing, and holding activities as appropriate to the commodity and operation to minimize infiltration of pathogens into produce.	N/A	No harvest activities
56	15.5.12	Dropped produce (i.e., produce that comes in contact with the ground prior to harvest) where the produce would not normally touch the ground as a part of growing and harvest (e.g., cantaloupe, almonds, etc.) shall not be distributed.	N/A	No harvest activities
57	15.5.13	Sewage disposal and septic systems shall be controlled and appropriate for the site to prevent the contamination of produce and food contact surfaces.	N/A	
58	15.5.14	Plumbing shall not allow backflow or cross-connection between waste and potable water lines.	N/A	Water supply from city source
59	15.5.15	All produce safety related records must be reviewed, dated, and signed within a reasonable timeframe after being made by the supervisor or responsible party.	N/A	
60	15.5.16	All produce safety documents and records must be retained at the site for 2 years after the record is	N/A	

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		<p>created. Where records are stored offsite, they must be retrievable within 24 hours.</p> <p>Records related to equipment or processes used by the site for analyses, sampling, or action plans—including the results of scientific studies, tests, and evaluations—shall be retained at the site for at least 2 years after their use is discontinued.</p>		
61	15.5.17	<p>Specific additional requirements for the harvesting, packing, and holding of sprouts.</p> <p>Establish and implement a written Environmental Monitoring plan for the testing of <i>Listeria</i> spp or <i>Listeria monocytogenes</i>.</p> <p>The environmental monitoring plan shall include the following criteria:</p> <ul style="list-style-type: none"> • Target test (i.e., <i>Listeria</i> spp. or <i>L. mono</i>) • Sample frequency (no less monthly) • Sample timing (i.e., when in the process are samples collected) • Sample sites where the number of samples and location are sufficient to determine the efficacy of controls (includes food contact and non-food contact surfaces) <p>The plan shall describe aseptic methods for sample collection and testing according to FDA's "Testing Methodology for <i>Listeria</i> species or <i>L. monocytogenes</i> in Environmental Samples," Version 1, October 2015 (or equivalent).</p>	N/A	No farm applied
62	15.5.18	<p>Specific additional requirements for the harvesting, packing, and holding of sprouts.</p> <p>The environmental monitoring plan shall include a corrective action plan if any samples are positive for <i>Listeria</i> spp. or <i>L. mono</i>.</p> <p>If <i>Listeria</i> spp. or <i>L. mono</i> are identified in the harvesting, packing, holding area, the following activities shall occur as a</p>	N/A	No farm applied

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		<p>part of the corrective action process:</p> <ul style="list-style-type: none"> • Resample positive surfaces and the surrounding area to determine the extent of contamination • Clean and sanitize the affected and surrounding areas • Resample and re-test to confirm the elimination of <i>Listeria</i> spp. or <i>L. mono</i> • Conduct finished product testing as appropriate • Take additional action to prevent recurrence and to prevent adulterated food from entering commerce 		
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