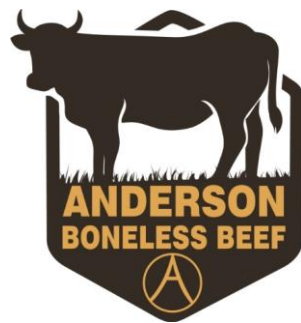


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ANDERSON BONELESS BEEF
Recall Plan
January 20, 2023

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Anderson Boneless Beef Recall Team

Person	Responsibility	Contact Information
Jay Donato, Program Manager/COO	Directs all product recalls; directs recall team and coordinates all actions; Oversees operational procedures at physical address; Oversees inventory system and management	Office: 303-289-5551 Mobile: 303-919-7147
Tom Grant, Production Manager	Oversees all production at physical address; Assesses affected product when needed	Office: 303-289-5551 Mobile: 720-636-3201
Mack Starr, VP/CFO	Oversees business operations; Creates documentation for customer facing notification; Oversees delivery of customer notification; Oversees communication with supplier of affected product	Office: 303-289-5551 Mobile: 816-262-7135
Ted Greeley, President/CEO	Oversees entire operation; Assists and directs as needed	Office: N/A Mobile: 410-739-5212

Preliminary Food Recall Information

The following information provides general background information on factors of a Halal recall that may affect the decision-making process of members of the Recall Team.

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Four classes of recalls

Four classes of recalls are defined based on the potential health effects.

Class I	Class II	Class III	Voluntary
<ul style="list-style-type: none"> • Most serious • Reasonable probability of causing serious injury, illness or death 	<ul style="list-style-type: none"> • May cause temporary illness that typically resolves in full recovery • Death and other serious consequences are not likely to occur 	<ul style="list-style-type: none"> • Not likely to cause illness but are still in violation of the law • Including cross-contamination with non-Halal products and mis-labeled product 	<ul style="list-style-type: none"> • Public health alert issued for non-recalled product • Issued internally based on QC check or customer feedback • Media coverage of potential hazard in product

At-risk Populations

Although every person is susceptible to foodborne illnesses, certain populations are at greater risk. It may be an important consideration when determining a course of action during the recall process. These high-risk populations include:

- Pregnant women
- Children younger than 5
- Adults over 65
- People with immune systems weakened by disease or medical treatment

Anderson Boneless Beef 24-Hour Recall Team Roster

ABB has four employees on a recall roster.

That member is responsible for implementing any initial recall action by responding to these alerts, as well as to news media stories covering a potential issue with a food product, by checking for any recalled product in our inventory system and determining whether further recall action is necessary (see following page).

Conducting a Mock Recall/Traceability Exercise

The facility will conduct two mock recalls annually to each to include two of the following areas: a finished good item, raw ingredient, and primary packaging. Mock recalls will be directed by the COO.

Mock recalls shall demonstrate a 100% trace of product within a 2 hour period.

NOTE: An effective finished product traceability exercise is one where a finished product lot is traced to the first level of distribution. The raw material and primary packaging shall be traceable one step back.

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Mock Recall Effectiveness Check

A documented management assessment must be completed after each mock recall to evaluate the program for improvements and required corrective actions.

Records from the mock recall must include:

- Manufacturer recall information with lot codes
- Anderson Boneless Beef recalled lot codes
- Recall class
- A complete list of all customers affected and amount of product they received
- A complete list of all affected product including location
 - o List of product remaining in warehouse
- Purchase/receiving receipt from supplier
- Proof of product relocation to "hold"
- Calculated percent of recovered product
- Start and end time for exercise

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Determining if a Recall Action is Necessary

Anderson Boneless Beef will conduct a health hazard evaluation to determine whether a recall is necessary if our product is adulterated or misbranded and is in commerce. The recall team will collect all information and data regarding the affected product. If the product in question has been produced, the team will determine whether any of the product has been shipped. After determining if product has been shipped, the team will need to find where the product is and if it is commerce and available to consumers.

The health hazard assessment should take into account the following: Whether any illnesses or injuries have occurred from consuming the product; who is at greatest risk of illness; how serious is the health hazard to the at-risk population; how likely is the hazard to occur; and what would happen if the hazard did occur.

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Gathering Evidence

Once it has been determined that a recall is needed, the COO or other designee will be responsible for communicating the following to the entire Recall Team.

- All product information and movement:
 - Identify the lot code of the product affected
 - Identify any pathogen of concern
 - Identify packaging
 - Identify equipment used.
 - Identify HACCP monitoring and verification activities performed.
 - Identify SSOP records
 - How much product is affected? What other product was produced that day that could likely be affected as well (during the same sanitation cycle)?
 - If the issue is with raw materials, were the same source of raw materials used in other lots and other days of production?
 - How much is in inventory?
 - Has this product already been delivered to any customers?
 - Who?
 - When?
 - How much?

The Production Manager and Warehouse Clerks will be responsible for working with the COO to gather evidence needed.

Physically Isolating Product in Inventory

The COO will ensure that recalled product is physically isolated from the rest of the inventory. The COO will also conduct an inspection to confirm that it has been physically tagged and held. When complete, this will be communicated to the entire Recall Team.

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Informing the Customer

The President and/or Vice President, using the Customer Recall Notice Template, will draft a Customer Recall Notice. The Customer Recall Notice will include the necessary information regarding the affected product. *If possible, notice to customers should be reviewed by legal counsel before being sent to customers.*

Information that will need to be included in outreach material (to be followed along with template):

- Date and time the notification is sent out to customer
- Full and accurate identification of the product:
 - Product/Brand Name
 - Product Code
 - Package/Case Size
 - Package/Case Date Code
 - Lot Number/Expiration Date
 - UPC Code
- Scope of outbreak (e.g. local, multi-state, etc.)
- The reason of for the recall and the nature of the hazard (e.g. *E. coli* O157:H7 contamination, metal debris, cross-contamination, etc.)
- Description of the risk involved if the product is consumed.
- Specific instructions on what should be done with recalled products
- Volume of product delivered to customer (e.g. case count, pounds)
- Exact date and time of delivery to customer from Anderson Boneless Beef (Month XX, 20XX)
- Request an official, written response that the customer acknowledges that they have been informed of the recall.
- Provide contact information for the customers to report whether they have any of the recalled product or if they have any questions regarding the recall.

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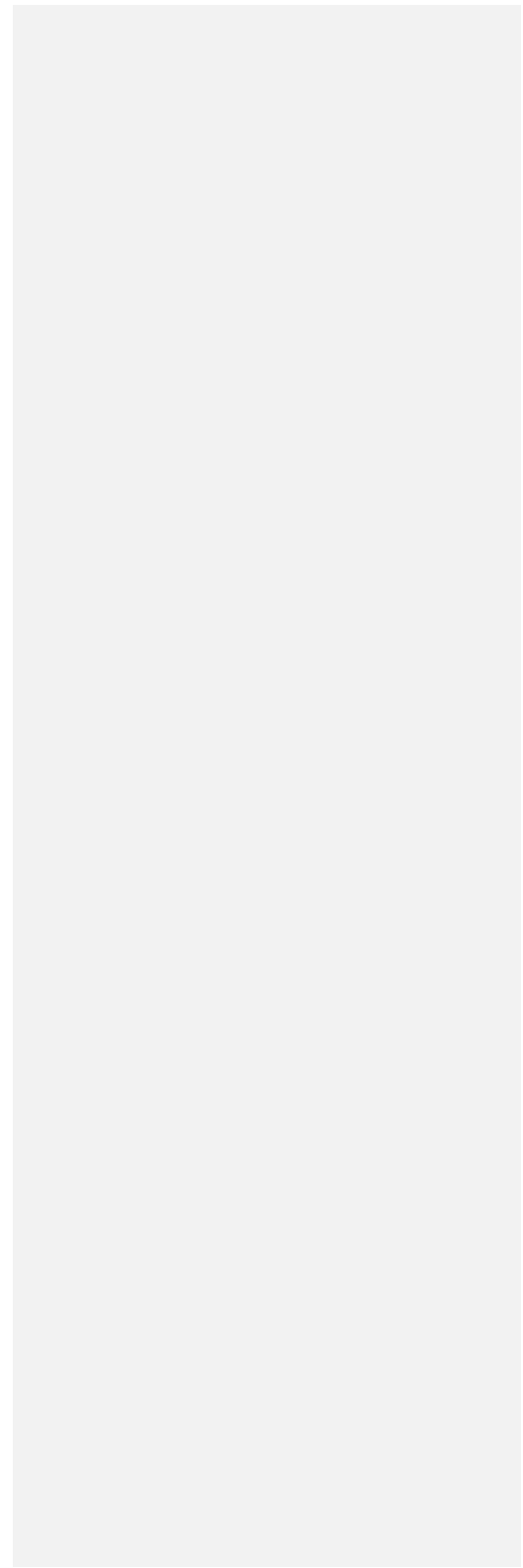
The Vice President, in coordination with the COO, will determine how to best notify customers based on the severity of the recall(i.e. class of recall), the volume of recalled product that has been distributed to customers,and the affected population (i.e. a high-risk population will need more immediate attention).

- Phone call (when urgent)
- Email with Customer Recall Notice Template document
 - Use bold declaration of “URGENT FOOD RECALL”
 - President to verify that communication was sent to customer(s)

Note:

All communication with customers must be documented for verification purposes. This includes all customer responses to verify that they received and acknowledged product recall communication from Anderson Boneless Beef.

- If customer was communicated to via phone, that conversation needs to be recorded – with the customer’s permission - OR that customer must *also* receive an email for documentation after the phone conversation.



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The Vice President will coordinate with the COO and any other Anderson Boneless Beef employees to request any relevant information or documentation needed to address the supplier of the recalled product.

It is recommended that the VP consult with the category manager of the recalled product for additional context, background information, and any other relevant information to assist with the recall.

The VP should review supply contracts to ensure compliance in notifying suppliers of the recall and communicating ABB's actions.

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Notification of Regulatory Agencies, Certification Bodies, SQFI.

In the case of an official recall, the COO will contact the USDA District Office (303-236-9800) to notify the district that we are initiating a recall of adulterated or misbranded product.

SQFI will be notified in writing at foodsafetycrisis@sqfi.com within 24 hours of the event. The certification body, NSF, will be notified at recalls@nsf.org (734-769-5105).

In the case of an official recall that affects Halal product, the COO will contact HTO to notify them of a recall.

Product destruction/reconditioning

- The COO or Production manager will, contact the local USDA District Recall Coordinator prior to product destruction. The USDA will review the proposed method of destruction and may choose to witness the destruction. ABB will send the proposed method to HTO for review, if it concerns Halal product.
- ABB will keep adequate documentation of product destruction (and whether destruction was witnessed by a USDA and HTO investigator).

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DATE _____

CUSTOMER FIRM NAME & ADDRESS

ATTN:

Re: RECALL OF

Dear Sir or Madam:

This letter is to confirm our telephone conversation that Anderson Boneless Beef is recalling the following product because:

Describe the product, including name, brand, code, package size and type, establishment number, etc.

We request that you review your inventory records and segregate and hold the above product. If you have shipped any of this product, then we request that you contact your customers and ask them to retrieve the product and return it to you. Once you have retrieved all of the product, please contact us. We will arrange to have the product shipped to our facility. Please do not destroy the product. We will credit your account for returned products.

We are undertaking this action in cooperation with the U.S. Department of Agriculture, Food Safety and Inspection Service (FSIS). FSIS officials may contact you to confirm that you have received this notice and are cooperating in this action.

Your prompt action will greatly Anderson Boneless Beef in this recall. If you have any questions, please do not hesitate to contact Jay Donato at 303-919-7147

Thank you for your cooperation.

Sincerely,

Anderson Boneless Beef Team

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**ANDERSON BONELESS BEEF RECALLS [PRODUCT] THAT MAY CONTAIN
[GLASS, PLASTIC, ETC.]**

[CITY], [DATE] – Anderson Boneless Beef, a Denver, Colorado establishment, is recalling approximately [AMOUNT] pounds of [PRODUCT] that may contain pieces of [SPECIFY MATERIAL].

The following products are subject to recall:

- [IDENTIFYING INFO: TYPE OF CONTAINER, WEIGHT, “BRAND NAME AND OTHER LABEL INFORMATION,” ESTABLISHMENT NUMBER, CASE AND/OR DATE CODES]

The products were produced [DATE] and distributed to [LEVEL OF DISTRIBUTION I.E. RETAIL ESTABLISHMENTS, INSTITUTIONS, ETC] in [STATES].

The problem was discovered through [SPECIFY HOW PROBLEM WAS DISCOVERED]. There have been [# or NONE] reports of injury from consumption of these products. Anyone concerned about an injury from consumption of the products should contact a physician.

Consumers and media with questions about the recall can contact the Anderson Boneless Beef office at 303.289.5551.