

Audit Report Global Standard Food Safety Issue 9

1. Audit Summary			
Company name	Mevsim Gıda Sanayi ve Soğuk Depo Ticaret Anonim Şirketi	Site code	2094195
Site name	Mevsim Gıda Sanayi ve Soğuk Depo Ticaret Anonim Şirketi		
Scope of audit	Washing, selection, peeling, cutting, sorting, blanching, sieving, freezing, calibrating, color sorting, packaging, metal detection, labelling of whole, diced and sliced IQF frozen fruits and vegetables packed in polyethylene bags and carton boxes. Packing of whole fresh fruit in polyethylene bags and carton boxes with viols.		
Exclusions from scope	None		
Justification for exclusion	N/A		
Audit start date	2026-03-23	Audit finish date	2026-03-24
Re-audit due date	2027-03-25	Head office	No

Additional modules included			
Modules	Result	Scope	Exclusions from Scope
Choose a module	Choose an item		
Choose a module	Choose an item		

2. Audit Results					
Audit result	Certificated	Audit grade	A	Audit programme	Announced
Previous audit grade	A		Previous audit date	2025-03-21	
Certificate issue date	2026-05-04		Certificate expiry date	2027-05-06	
Number of non-conformities			Fundamental	0	
			Critical	0	
			Major	0	

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Auditor: Ayşegül Binicioğlu



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2. Audit Results

	Minor	6
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3. Company Details

Site address	Turanköy Mahallesi Turan Cad. Mevsim Gıda Sit. No:11 Kestel, Bursa		
Country	Türkiye	Site telephone number	+90 224 383 3601
Commercial representative name	Ersegün Sarı	Email	ersegun@mvsm.com.tr
Technical representative name	Erhan Özdil	Email	erhan@mvsm.com.tr

4. Company Profile

Plant size (metres square)	<10K sq.m	No. of employees	51-500	No. of HACCP plans	1-3
Shift pattern	2 shifts (08.30-17.00, 21.30-06.00)				
Seasonal site	No				
Seasonal opening times (Start/end date)	Click or tap to enter a date.			Click or tap to enter a date.	
Other certificates held	ISO 22000, Kosher, SEDEX				
Outsourced processes	No				
Outsourced process description	N/A				
Regions exported to	Asia North America Europe Choose a region Choose a region Choose a region				
Company registration number	TR-16-K-009230				

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4. Company Profile	
Major changes since last BRCGS audit	The company's Food Safety Team Leader (FSTL) has changed, and the new FSTL is Erhan Özdi.
Company Description	
Mevsim Gida started its operations in 1993. Its owner Mr. Özkan Kamiloglu has 40 years' experience in the sector of packing, production and the trade of fresh and frozen fruit and vegetables. The site is located in Turankoy Kestel, Bursa covering total indoor area 8.442 m² and total area is 25.000 m². Number of HACCP study is 1. Official registration has been completed with TR-16-K-009230 number. The production volume is estimated to 35,000 ton/year processed/packed in a 12-month season. During the picking season the personnel increase to approximately 115 operating in a double shift pattern. There are 2 frozen lines and 1 fresh product line. Fresh products are typically figs, quinces. Frozen products are spinach, leeks, onions, cauliflower, broccoli, peas, green beans, oranges, grapefruit, figs, strawberries, pomegranates, okra, tomatoes and cherry tomatoes, grapes, pears, silverbeet, peaches, apples, etc. The company is currently exporting to England, Belgium, France, Holland, Spain, Italy, Greece, Serbia, Poland, South Korea, Mexico, Canada, Japan, Arabia, Israel, USA, Rusia, Taiwan. The final products are only sold to food processor companies. Contact name in an emergency case: Ersegün Sarı, e-mail: ersegun@mvsim.com.tr, Phone: 0090 507 602 8000. No voluntary modules. BRCGS logo is not used. No witness audit.	

5. Product Characteristics					
Product categories		05 - Fruits, vegetables and nuts 06 - Prepared fruit, vegetables and nuts Category Category Category Category Category Category			
Finished product safety rationale		Raw, whole fruit and vegetables: natural acidity of fruit (pH <5), chilled storage and distribution (0-6°C). Frozen IQF fruit and veg: frozen storage and distribution (-18°C). 3-10 ppm chlorine wash for fresh cherries and all IQF frozen fruit and veg except raspberries and blackberries). Blanching temperature min 70°C, 2 min. Shelf life up to 1 month for fresh and 2 years for frozen.			
High care	No	High risk	No	Ambient high care	No
Justification for area		Products does not support the pathogen growth during storage are classified as low risk because of low pH levels. The fruits which have higher pH level decided as low risk at Step-4. Because all fruits even if the pH level is low, are intended to be used as raw material and it cannot be eaten without adequate cooking/heat treatment. Frozen vegetables are classified as low risk at Step-4 because of cooking instructions are in place (min.70 C, 2 minutes)			

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5. Product Characteristics	
	before final consumption and also blanching process is critical control step in the company.
Allergens handled on site	None
Product claims made e.g. IP, organic	KOSHER
Product recalls in last 12 months	No
Products in production at the time of the audit	23.03.2026: IQF Sliced Cherry tomatoes, Lot: 6082, in blue PE bag and 10 kg cardboard box 24.03.2026: IQF Sliced Cherry tomatoes, Lot: 6083, in blue PE bag and 10 kg cardboard box

6. Audit Duration Details			
Total audit duration	20 man hours	Duration of production facility inspection	10 man hours
Reasons for deviation from typical or expected audit duration	No deviation		
Combined audits	None		
Next audit type selected	Unannounced – mandatory 1 in 3 years		

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 1.1.11)					
Name	Job title	Opening meeting	Site inspection	Procedure review	Closing meeting
Ersegün Sarı	General Coordinator	x	x		x
Erhan Özdil	FSTL	x	x	x	x
Tuğba Yener	Quality Chief	x	x	x	x
Seyrullah Özgür	Production Manager	x	x		x
Özden Gündoğan	Production Chief		x		

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Mahmut Yüksel	Technical Manager		x	x	
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GFSI Post Farm Gate Audit History			
Date	Scheme/Standard	Announced/Unannounced	Pass/Fail
2023-03-22	BRCGS Food Safety Standard Issue 9	Announced	Pass
2024-02-13	BRCGS Food Safety Standard Issue 9	Unannounced	Pass
2025-03-21	BRCGS Food Safety Standard Issue 9	Announced	Pass

Document control			
CB Report number	AGFOTR00102-BRC260324		
Template name	F908 Food Safety Audit Report Template		
Standard issue	9	Template issue date	2022-12-16
Directory allocation	Food	Version	1.1

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Non-Conformity Summary Sheet

Critical or Major Non-Conformities Against Fundamental Requirements			
Clause	Detail	Critical or Major	Re-audit date

Critical		
Clause	Detail	Re-audit date

Major						
Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

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Minor						
Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by
1.1.6	There is a box for confidential reporting in the second floor of the administrative building but there are no materials (paper and pen) for the employees to write about their concerns.	The form and the pen have been put near the confidential reporting box.	The confidential reporting box will be audited more systematically in PRP audits. Relevant staff will be re-trained.	The form and the pen have been taken away for the cleaning of the wall of that area and the cleaning responsible have been forgotten to put the form and the pen again near the confidential reporting box after cleaning.	2026-04-20	Ayşegül Binicioğlu
4.4.8	There was a gap under the shipping door.	The gap under the shipping door has been fixed.	All other similar doors were checked. The doors will be audited more systematically in PRP audits. Relevant staff will be re-trained.	Inadequate site inspection and inadequate attention on doors due to the lack of training of the responsible personnel.	2026-04-20	Ayşegül Binicioğlu
4.6.5	It was been determined that the apricot kernel extraction machine in the production area was not labeled as out of service.	The apricot kernel extraction machine in the production area has been labeled as "out of service."	All other equipment has been checked. Out-of-service equipment will be audited more systematically in PRP audits. Relevant staff will be re-trained.	Due to the lack of training of the responsible site personnel, site inspections were carried out inadequately and insufficient attention was given to out-of-service equipment.	2026-04-20	Ayşegül Binicioğlu
4.6.6	It was determined that the paint on one of the forklift in	The paint peeling identified on one of the forklifts in the external loading area has been rectified; the surface	Maintenance and warehouse personnel will receive awareness training on equipment	Due to the intensive use of the pallet truck, wear developed over time on the surface paint, and this	2026-04-20	Ayşegül Binicioğlu

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Minor						
	the outside loading area was peeling.	was cleaned and properly repainted to ensure the integrity of the equipment surface.	surface integrity, contamination risk, and BRCGS 9 Clause 4.6.6 requirements. Equipment surface conditions will be monitored more systematically in PRP checks and internal audits.	was caused by the lack of regular monitoring of the equipment surface condition in terms of hygiene and contamination risk.		
4.14.5	Pest station no ÜR 5 which is located near the shipping door was not fixed.	Pest station no ÜR 5 has been fixed to the wall.	Pest stations have been verified in all areas. Forklift drivers will be re-trained.	A forklift had very recently hit the pest station, because the driver was not enough aware of the attention he had to give to such equipment, and did not think to give the information to responsible.	2026-04-20	Ayşegül Binicioğlu
7.1.4	During the site audit, some employees did not demonstrate sufficient awareness regarding allergens in the interview.	All staff were trained about allergens.	Training Effectiveness Controls will be carried out more systematically.	The staff were not sufficiently aware and were very excited during the audit.	2026-04-20	Ayşegül Binicioğlu

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Comments on non-conformities

Click or tap here to enter text.

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Additional Modules / Head Office Non-Conformity Summary Sheet

Critical		
Clause	Detail	Re-audit date

Major						
Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

Minor						
Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

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Audit team

Lead auditor		
Auditor number	First name	Second name
20847	Ayşegül	Binicioğlu

Audit team				Attendance (YYYY/MM/DD, 24hr: MM)			Presence	
First name	Second name	Auditor number	Role	Audit Date	Start time	End time	Remote or physical	Professional recognition number
Ayşegül	Binicioğlu	20847	Lead Auditor	2026-03-23	08:00	19:00	Physical	
Ayşegül	Binicioğlu	20847	Lead Auditor	2026-03-24	08:00	19:00	Physical	

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Detailed Audit Report

1. Senior management commitment

The company has a quality and food safety policy (POL-01, Rev03, 01.09.2021) includes food safety, quality, authenticity, food safety and quality culture, continuous improvement, which has been approved by General Manager Özkan Kamiloglu and communicated to all staff by hanging in the production area and social facilities, and training. Last training: Policy and Objectives Training, Date: 19.09.2025, 4 hours, 54 participants, in the canteen area. Reference materials: POL-01 Quality and Food Safety Policy, POL-02 Hygiene Policy, POL-03 Human rights policy, POL-04 Glass-Hard Plastic Policy, etc. Trainer: Tuğba Yener Serdar (Quality Chief).

Food Safety and Quality Culture Procedure has been established: PR-32 r00 02.01.2023.

Food Safety Quality Culture Plan (PL 11, Rev01, 02.01.2022) is reviewed annually, and planning date for 2025 is on 02.01.2025, planning date for 2026 is on 02.01.2026. Activities have been determined for senior management, quality, human resources, food safety team leader, purchasing, sales and marketing, production, maintenance-repair units. Plan includes the frequency of planned activities and the dates performed. Effectiveness evaluation has also been indicated in the plan. Effectiveness of activities are reviewed at the end of each year. 2025 planning has been evaluated on 30.12.2025.

For 2026 when planning activities, issues such as customer complaints, employee feedback, monitoring outputs of behaviour and personnel performance, training effectiveness evaluation results, communication are taken into account according to the procedure.

Examples of activities: trainings: executive activity: timely implementation of planned trainings, monitoring of training effectiveness, follow-up of unplanned trainings. Planned date of the activity: followed according to the training plan. Monitoring of planned activity: Monitoring is carried out monthly, planned and unplanned trainings and training activities are reviewed.

Food Safety and Quality Culture training has been provided on 12.02.2026, duration: 4hrs, by Tuğba Yener Serdar (Quality Chief), 69 people attended.

Quality objectives are recorded and monitored with the Process Objectives Tracking Form (F 047, rev02, 02.01.2026), planned on: 02.01.2026. A total of 17 objectives were set for 2026. E.g., personnel satisfaction measurement average min.70%, at least 40 hours of training per person per year, Maximum 12 hours of machine downtime per month, number of returned products: max. 3/years, Number of non-conforming items max 3/year, etc, Customer complaints: Max.8/year. Monthly monitoring is carried out during food safety meetings.

E.g., Monitoring results:

Target: Customer complaints Max.12/year for 2025 and achieved 5 customer complaints happened in 2025 which needs corrective action.

Target: Maximum 12 hours of machine downtime per month and achieved with 1,27 hours in 2025.

Objectives are monitored monthly by the Quality Manager. Monitoring results of the targets are reported to the senior management quarterly. It is delivered to the personnel by hanging it on the notice boards.

Management Review Meeting Report (F 103, Rev03, 01.09.2021) has been checked. Last meeting has been conducted on 23.01.2026. Özkan Kamiloglu (General Manager), Ersegün Sarı (General Coordinator), Emre Kamiloglu (Vice General Manager), Seyrullah Özgür (Production Manager), Adem Kantaş (Agricultural Purchasing Manager), Tuğba Yener Serdar (Quality Chief / ex Food Safety Team

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Leader), Taner Murat Parlak (Agricultural purchasing responsible), Özden Gündoğan (Production Chief), Feyza Şeyhoğlu (Quality Chief), Mahmut Yüksel (Technical Manager), Alihan Ateş (Quality Responsible), Elif Göktürk (Quality Responsible), Sadiye Birgül (Production Engineer), Zühre Betül Tüsüs (Quality Responsible), Hasan Döver (Quality Responsible), Merve Şenel (Foreign trade manager), Filiz Çoğal (Finance Manager), Gönül Sever (Human resources manager), Melih Alibekiroğlu (Logistics responsible) are the people who attended the meeting from the top management. Example of agenda items of the meeting:

Previous MRM outputs, audit results, Corrective actions, Customer complaints, Target results, HACCP, food defense, authenticity, the effectiveness of food safety and quality culture plan systems, Resource requirements, etc.

Decision, action, application period, responsible, result have been recorded clearly.

Actions arising from the management review meeting on 23.01.2026 were assigned to key members of staff and signed off as completed in one year. The decisions made and actions taken at the meeting held on 23.01.2026 are communicated to the relevant personnel by posting Management Review Meeting Report (F 103), on the notice board in the facility's canteen. Management review meetings are conducted at least annually.

Food safety team meetings are held monthly. The agenda items of the meeting are customer complaints, food safety and quality system, product authenticity, PRP, Cleaning Practices, internal-external inspection results, personnel satisfaction, TACCP. The last meetings are – date: 13.03.2026 meeting no: GGE-2026/03, date: 16.02.2026 meeting no: GGE-2026/02. The recordings are documented in the Meeting Registration Form (F 018). Decisions made and actions taken at food safety team meetings are communicated to relevant personnel by posting the meeting record form (F 018) on the notice board in the facility's canteen.

HR Procedure (PR 24, Rev03, 01.04.2022) includes methods related to the management of employees' concerns, suggestions and complaints including confidential reporting system (whistleblowing). There is box in the company who can write everything about quality, food safety with confidentiality. And the QM telephone number is always available for all stuff for these kinds of reports. HR manager and FSTL are responsible from evaluating reports. Training has also been given on confidential reporting system on 14.10.2025, 69 people attended, trainer: Tuğba Yener Serdar, duration: 2 hrs. There are no notifications available for the year 2025 and there are no notifications in 2026 yet.

Wish, Suggestion and Complaint form F 085 r00 01.09.2021.

The senior management has provided the human and financial resources required to produce food safely and in compliance with the requirements of BRCGS. These topics also recorded in the management review meeting which is done on 23.01.2026.

The system is in place to keep informed of scientific and technical developments, industry codes of practice and all relevant legislation applicable in the country of raw material supply, production and, the country where the product is sold. There is a person who is responsible (Tuğba Yener Serdar) for following the legal requirements such as Turkish food codex, country regulations, etc. F 064 External Originated document list is reviewed monthly and last review was on 13.03.2026 and last updated on 04.02.2026.

BRCGS Food Safety Issue 9 is available as electronic and hard copy.

Ersegün Sarı (General Coordinator) was available during the audit for a discussion on effective implementation of the food safety and quality culture plan.



The root causes were evaluated effectively together with corrective actions against previous BRCGS audit findings. Corrective and Preventive Action Form (F 012). The root causes of each nonconformity were analyzed.

BRCGS logo is not used. The company is aware of the BRCGS logo using rules.

The company is registered with relevant authorities. Registration number: TR-16-K-009230

The Organization Chart (OC-01, rev07, 02.01.2026) has been documented. Head of the Board of Directors, General Manager, Financial Affairs Manager, Agricultural Purchasing, Production Manager etc. main units were formed, production foremen, IQF operators etc. were formed under these main units.

Deputies are defined in the deputy chart GT-00 r06 01.01.2022. E.g.

Ex: Deputy of technical manager is general coordinator or production manager, Deputy of production manager is production chief.

Job descriptions are available. Following samples were checked:

GT-03 Production Manager Job Description (r03, 02.01.2022)

GT-13 Maintenance and repair Responsible Job Description (r03, 02.01.2026)

Orientation training is given to the personnel at the beginning of the job, job instructions are explained.

And job descriptions. E.g.

New employee: E.D., production staff job description GT-15 (signed by E.D. on 19.01.2026)

Orientation training form F 013, Ö.G. dated 19.01.2026.

Orientation training presentation was seen.

In addition, the personnel can access the job instructions related to their job via Google Drive. Here work instructions are available as non-modifiable PDF files and staff can access all the instructions they need. In addition, it is evaluated whether the personnel work in accordance with the instructions during the performance monitoring process.

The notification requirement was explained to all personnel by giving BRC Issue 9 training. Training date 08-09.01.2026, duration 2 days, trainer: Ersegün Sarı, 65 people participated.

Consultancy service is provided to the company. A valid service contract with "A Danışmanlık" dated 05.01.2026, is available. The management and maintenance of the system are provided by employees.

Minor NC 1.1.6: There is a box for confidential reporting in the second floor of the administrative building but there are no materials (paper and pen) for the employees to write about their concerns.

Details of non-applicable clauses with justification

Clause/Section Ref	Justification

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2. The Food Safety Plan – HACCP

Food Safety Team Chart Ş-01 r06 02.03.2026. Team Leader: Erhan Özdil (Quality Manager), Members: Tuğba Yener Serdar (Quality Chief), Emre Kamiloğlu (Vice General Manager), Ersegün Sarı (General Coordinator), Adem Kantaş (Agricultural Purchasing Manager), Seyrullah Özgür (Production Manager), Elif Göktürk (Quality Responsible), Mahmut Yüksel (Technical Manager), Taner Murat Parlak (Agricultural Purchasing Responsible), Özden Gündoğan (Production Chief), Sadiye Birgül (Production Engineer), Oğuzhan Kurtuluş (Production Engineer), Alihan Ateş (Quality Responsible). Team assignment letter is available dated: 02.03.2026.

Team leader Erhan Özdil has 25 years experience in food industry. All team members have been trained on BRCGS FS Issue 9.

The HACCP plan covers all products and activities. HACCP Plan (HP-01, r11, 02.01.2026). CCP-1 blancher, CCP-2 IQF, CCP-3 X-Ray, CCP-4 metal detector.

The HACCP Prerequisite Procedure is documented (PR-14, r08, 02.01.2026). These are mainly: cleaning and sanitation, personnel hygiene, pest control, chemical and physical contamination control, supplier management, waste control, calibration, maintenance and equipment control, receiving, in-process and final product inspections, personnel awareness, recordkeeping, security, allergen management and storage / delivery management. There are no high-risk, high-care, ambient high care areas in the site. PRP is reviewed during MRM.

All product descriptions were defined in Product Specification. Total of 34 product description.

E.g., Frozen Cherry Tomato product description SP-01-05 r06 04.02.2026. All required information are available. E.g.:

Ingredients: Fresh cherry tomato

Origin: Türkiye

Brix°: Min.6 (7-9 target)

pH: 3,5-4,5

Microbial limits are defined. E.g., TVC: 100.000, Total coliform: max.1000, E.coli: <10, etc.

Temperature Checks: Final packed product temperature not to be warmer than -15°C.

Storage: Storage at -18°C or below.

Distribution Conditions: Goods should be loaded at -18°C via reefer trucks or containers.,

Shelf life: 2 years.

Consumer group: All consumer groups should eat. Additional info: This product is raw material to our customers. Once the product has been thawed, it should not be re-frozen. The product must be used after cooking instruction which is minimum 72°C and 2 minutes. The customer should store the product at -18°C or below. The customer must obey all the food safety rules when using our product.

A total of 43 flowcharts were created.

E.g., Frozen orange chunks (FC-4402 r06, 23.10.2023): Raw material acceptance, cold storage, pre-washing, selection and elimination, peeling, hand cutting into chunks, selection and elimination, magnet, IQF, vibrating sieve, selection and elimination, sorter, selection and elimination, X-ray, packaging, metal detector, labelling, palleting, wrapping, frozen storage, loading, shipment.

On-site verification of flowcharts have been completed on-site with the HACCP team.

E.g., Frozen Mandarin Segment Flow Diagram FC-3700 has been verified on 13.11.2025 (lot no: 5317) by food safety team members.

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E.g., Frozen Grapefruit Segment with out membran Flow Diagram FC-4203 has been verified by food safety team on 21.11.2025 (lot no: 5325). These last verification of the flow diagrams are routine verification controls.

List of information and sources used in hazard analysis F 119 r02 25.02.2026 has been documented. Regulations, literature, water scheme etc.

Hazard and Risk Analysis Evaluation List (TA-01, r13, 04.02.2026). Microbiological, physical, chemical, radiological, allergen, food fraud contamination risks are defined.

E.g., Cooling after blancher, hazard: microbiological contamination from the cooling water, preventive action: chlorination of the water (between 3-10 ppm), chlorine test every hour during the production, analysis by the external laboratory according to the water analysis plan (1 in 3 months).

HACCP Procedure PR-15 r03 01.03.2023 includes risk assessment methodology, probability severity product-based risk scoring is defined. If the risk value is 10-25, it is managed as unacceptable risk and CCP. Scores of 5, 8, 9 are managed as serious risk and oPRP. Scores of 2, 3, 4, 6 are managed as acceptable risk and PRP. Food fraud and food defence related risks have been analysed in separate documents; TACCP-Food Defence Instruction (ÜTL-45, r01, 02.01.2023) has been documented. Internal and external hazards Risk analysis was carried out within the scope of TACCP Food Defence Risk Analysis (F 069, r02, 02.01.2026), updated date: 02.01.2026.

CCPs, limits, monitoring frequencies, corrective actions have been documented: HACCP Plan (HP-01, r11, 02.01.2026).

CCP-1: Blanching limits: min. 75°C 2 mins, monitoring frequency: every 3 hrs, corrective action: selling as under blanched products. Monitoring record: Frozen Product Process Control Form (F 041),

Example: Frozen Product Process Control Form (F 041), Product: Frozen Red Strip Papper, production date: 30.09.2025, blanching temperature: 81°C duration: 2 minutes 10 seconds.

CCP-2: IQF, limits: max. -15 (product temp.), monitoring frequency: every hour, corrective action: refreezing.

Example: IQF CCP monitoring form F 056 dated 13.11.2025, checks are done twice a hour: 08:30-09:00 – room1: -28°C, room2: -30°C, product: -21; at 09:00:09:30 room1: -29°C, room2: -30°C, product: -22°C, etc., checked by Alihan Ateş, Approved by Tuğba Yener Serdar.

CCP-3: X-Ray, limits: SL glass 2.5mm, ceramic 2.5mm, ss 1mm; monitoring frequency: before and after production, every 2 hours during production; corrective action: Quarantining product from the last correct check, Re-checking the quarantined products when device works properly.

Example: Monitoring record: X-ray Control form F 121 dated 13.11.2025, controls have been done in every 2 hours (08:30, 10:30, 11:30), SL Glass: 2.5 mm, Ceramic: 2.5 mm, SS: 1.0 mm, all controls are ok, records are approved by Tuğba Yener Serdar.

CCP-4: Metal Detection, limits: Fe: 2,5mm, Non-Fe: 3.2mm, SS: 3.2mm, monitoring frequency: before and after production, every hour during production, corrective action: quarantining products from last check and rerun metal detector.

Example: Metal detector control form F 040 dated 13.11.2025, controls have been done hourly (08:30, 09:30, 10:30, 11:30), 2,5mm Fe, 3,2mm Non-Fe, 3.2mm, all controls are ok, records are approved by Tuğba Yener Serdar.



CCP validations are checked and found satisfactory. E.g., X-ray limits validations, Validation form for any changes: F068-1
3 trial have been completed, dates:

12.09.2023, 26.09.2023, 17.10.2023. All trials are ok, validation has been completed on 17.10.2023.

Verification and validation form (F 068, r03, 02.01.2026), last verification was made on 10.03.2026 (system verification frequency: every 3 months). These are routine verification controls. There are no changes in the HACCP Plan from 10.03.2026 to audit date. Process and product evaluation, evaluation of product safety information, CCPs, critical limits, monitoring, corrective action, validity of CCPs, evaluation of adequacy of recording methods, current CCP documentation, review of PRPs, by HACCP team members Erhan Özdil, Seyrullah Özgür, Adem Kantaş, Mahmut Yüksel and verification is approved by Ersegün Sarı. It is reviewed at the management review meeting.

oPRP, PRP and HACCP plans are reviewed at least annually, during the Management Review Meeting.

Details of non-applicable clauses with justification

Clause/Section Ref	Justification

3. Food safety and quality management system

3.1 Food safety and quality manual, 3.2 Document control, 3.3 Record completion and maintenance

The company has the procedures in place necessary to meet the requirements of the Standard. The company has a food safety manual: GGEK rev04 04.01.2023 approved by General Manager. The Food Safety Quality manual includes elements of the food safety system, HACCP, quality and operating procedures, work instructions and other documents that the Standard requires for the site, infrastructure, product control, process control and personnel.

E.g. Control of non-conforming products: PR-04 r03 01.10.2022.

All working procedures and instructions are clear and are available in adequate places. Procedures and instructions are conveyed to the personnel through trainings.

Instructions, procedures are duly documented in Turkish language (since all the employees are Turkish), and updated versions are maintained in the site. It has been checked that the current revisions of the documents and records defined in the current document list are used in the field.

The company has a quality system in place consisted of documents and records. Document management procedure: PR-01 rev03 01.01.2022.

The responsible person of document revisions: Tuğba Yener Serdar

Current document list F 001 is in place.

Changes and amendments are recording on F 003 r02 02.01.2026

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Backup is done monthly. Data backup registration form F 039 r01 01.01.2022, records were checked for dates 12.01.2026, 11.02.2026, 10.03.2026.

The system records are adequately maintained and are complete and legible. There is a documented procedure for keeping quality records and backups including electronic records and it is implemented.

Records control procedure: PR 02 r05 01.01.2022.

The company ensures that the records are not manipulated.

Records are kept for a shelf life + 1 year. Shelf life, Frozen products: 2 years. Record retention period is 3 years at departments, 2 years at archives.

Records are stored and accessed both electronically and in printed form.

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3.4 Internal audits

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Internal audit procedure PR 03 r06 16.05.2022 is implemented. The company has carried out an internal audit within the last 12 months. The scope of the audit includes all the standard requirements and the food safety plan. The results of the last internal audit correspond with the reality of the production facility. The program includes at least four different audit dates spread throughout the year. The 2026 internal audit plan has been documented: PL 02 plan date: 02.01.2026. E.g.,

Frequencies are based on risk – score 1-3 points low (1 at 2 years), between 4-9 points (1 per year), 10 or more high risk (every 6 months), according to internal audit procedure. There are no 1-3 points processes / departments in the plan.

E.g.,

Food safety team (HACCP, Senior Management, Food Safety and Quality Management System, Facility Safety and Food Defence, Product Control, Process Control) frequency: twice a year: June 2026 and December 2026, auditor: Kurtuluş Kavak

Human Resources: once a year: February 2026, auditor: Ersegün Sarı

Senior Management: once a year: October 2026, Auditor: Kurtuluş Kavak

Shipment – Sales Marketing (Complaints, dispatch and shipping, senior management, GG and quality management system): once a year: November 2026, Auditor: Kurtuluş Kavak

Production, maintenance, quality: twice a year: January 2026 and July 2026, Auditor: Kurtuluş Kavak

Internal auditors are competent and do not audit their own works.

Kurtuluş Kavak (Consultant / Lead Auditor) BRCGS FS Issue 9 lead auditor training: 09.11.2022 by BRCGS

F.007 Internal audit checklist and Internal audit report form F 008 (r03 01.09.2021) are in place, fully identify conformity and non conformities and include evidence of the findings.

The following internal audit reports were checked during the audit:

Auditee: Production, Quality and Maintenance

Audit date: 09.01.2026

Auditor: Kurtuluş Kavak (consultant)

2 NCs founded: Example of one NC: Maintenance personnel were observed entering the production area without wearing hairnets.

CA No: 26-01, CA Form F 009, date 09.01.2026, Action: The relevant personnel were reminded about hygiene rules and the use of hairnets.. The CA has been closed on 16.01.2026. Review of the effectiveness of corrective action was on 20.02.2026.

Auditee: Food Safety Team

Audit date: 22.12.2025

Auditor: Kurtuluş Kavak (consultant)

2 NC has been founded and has been closed effectively, CA No: 25-17 and 25-18.

All the corrective actions because of the internal audit results are followed by the Management Representative with timescale with F 009 Corrective and preventive action form / Corrective and preventive action follow-up form F 012 (r02 02.01.2026). And the food safety team leader is responsible for all these activities follow up.

PR-14 r08 02.01.2026, PRP procedure includes risk analysis for determining facility inspection frequency: If the number of nonconformities in the audit is less than 5, it continues monthly, if it is between 5-10, it is done every 15 days, if it is more than 10 or the same nonconformity is detected twice in a row, it is done once a week. Documented inspections of the factory environment and equipment are performed monthly: Prerequisite verification question list F 087, last inspection dates: 03.03.2026, 02.02.2026, 02.01.2026. In the last inspection, date:03.03.2025, auditor: Tuğba Yener Serdar, 3 NCs found. Results are reported to relevant responsible personnel.E.g.there was no disinfection in the hygiene corridor, the water drinking area was dirty, etc.

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Results of internal audits and facility inspections are reviewed during management review meetings.

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw material and packaging

The company has an effective supplier approval and monitoring system to ensure that any potential risks from raw materials (including packaging and service suppliers) to the safety, legality, and quality of the final product are understood and managed. This has been made considering the contamination from allergens, fraud, foreign bodies, chemical or microbiological contamination, and significance to the final product. Approved packaging and service supplier list (including supplier risk assessment): F 019 r09 02.03.2026 and updated on 09.03.2026

Suppliers are classified as low, medium, and high risk. The score is between 1-2 low risk, 3-4 medium risk, and 6-9 high risk.

All purchasing materials are from processors or farmers, no purchasing from brokers.

Purchase and supplier evaluation procedure: PR-08 r03 01.01.2022

For the first approval of raw material suppliers, Agricultural Purchasing inspects the supplier -site, specification compliance, etc. is questioned, analysis certificate is required. For packaging material suppliers, quality certificates and migration analysis are required.

Approved raw material supplier list: ZFR-24 r06 04.01.2023 updated on 06.03.2026

E.g., Supplier evaluation form: ZFR-27 dated 12.01.2026, product: mandarin, Supplier: Mandalinya Tarımsal LTD.ŞTİ., Score: 70/100

E.g., Supplier evaluation form: ZFR-27 dated 06.03.2026, product: grapefruit, Supplier: Arif Kılınç, Score: 83/100

Performance evaluations done with F 020 dated 09.03.2026

Bursa Etiket, 93 points /100

Bil Plastik Ambalaj, 92 points / 100

Dentaş Ambalaj, 60 points / 100

E.g., supplier: Bil Plastik Ambalaj – product: LDPE + PE bag (primary packaging), score: 3 – medium risk.

Bil Plastik Ambalaj is not GFSI certified, so the company makes an on-site audit for Bil Plastik (20.02.2026). At the time of the on-site audit traceability system of the Bil Plastik was audited in detail. The on-site audits and auditing of the traceability system are on first approval and then at least every three years.

Supplier inspection report: F 021 dated 20.02.2026 inspection score: 30/40

For Bil Plastik Ambalaj; Migration analysis certificate: dated 28.07.2025 by LTS Lab. accredited by TURKAK AB-0351-T, report number: LTS.R.2025.03923, results are ok.

The actions taken according to the scores according to the supplier evaluation procedure are as follows:

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If it is less than 50, the purchase cannot be made.

Between 50-90 purchasable, improvements are requested

Close cooperation between 90-100.

Where information for effective supplier approval is not available for the bulk agricultural products product testing is used to verify product quality and safety in the entrance of the raw material. All these details and other expectations are detailed in the Purchase and supplier evaluation procedure: PR-08 r03 01.01.2022.

All raw materials are purchased from farmers. No purchasing from brokers.

Raw materials are agricultural bulk products. Instead of validation, product testing is used to verify product quality and safety. It is defined in the procedure.

3.5.2 Raw material and packaging acceptance, monitoring and management procedures

There are adequate controls on the acceptance of raw materials and packaging. Acceptance of raw materials and packaging is based on inspections on receipt, specifications, certificates of conformity, certificates of analysis, product sampling, and testing.

All materials are checked according to a specific sampling plan approved by the Quality Manager.

Sampling is done before raw material acceptance and from the final products. Raw material input control Plan: GP-01 rev04 01.11.2021.

E.g. Grapefruit – no foreign matter, insect damage 10%, brix min. 9, pH 2,5-3,0, etc.

E.g. input control form F 026-37 Mandarine Input Control Report: dated 13.11.2025 at 13:55, quantity: 16632 kg, amount of sample taken: 8000 gr, supplier: Mandalinya Tarımsal LTD.ŞTİ., controlled by: Elif Göktürk, result: positive.

E.g. Raw material industrial tomatoes pesticide analysis on 01.09.2025 SGS accredited by TURKAK AB-0726-T.

E.g. Raw material industrial tomatoes heavy metal analysis – lead and cadmium, dated 03.09.2025 SGS accredited by TURKAK AB-0726-T.

E.g. Input control form F 025-07 dated 07.11.2025, product: blue PE bag, amount: 516 pieces, supplier: Bil Plastic, lot accepted.

The input control plan is posted where the relevant personnel can see it and they are informed of the changes. The quality manager is responsible and the current approved supplier list is in use during the raw materials and packaging acceptance.

3.5.3 Management of suppliers of services

PR-08 (r03 01.01.2022) Purchase and supplier evaluation procedure is implemented. The company demonstrated that the outsourced services is appropriate and food safety, legality and quality risks are evaluated to ensure effective controls are in place. The following service supplier evaluation records were checked during the audit:

Catering: Kayra Yemek performance evaluation F 020 dated 09.03.2026 – score: 57/64

Pest control: EGAM performance evaluation F 020 dated 09.03.2026 – score: 58/64

Calibration: KALMET performance evaluation dated 09.03.2026 score: 61/64

Transportation: Kinay performance evaluation dated 09.03.2026 – score: 61/64

Laboratory: SGS performance evaluation dated 09.03.2026– score: 62/64

Formal agreements have been provided.

E.g.: Environmental management system business contract with Mars Çevre Danışmanlık dated 02.01.2025 valid until cancelled.

Transport companies contracts: Kinay Taşımacılık dated 01.01.2023 valid until cancelled.

Kayra Catering Company dated:01.01.2017 valid until cancelled.

EGAM pest control company dated: 01.01.2026 valid until 31.12.2026.



3.5.4 Management of Outsourced processing

N/A: No outsourced process

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3.6 Specifications

The specifications of raw materials and packaging materials sampled meet legal, technical and food safety requirements.

TŞ-01 includes all raw materials.

TŞ-02 includes all packaging and auxiliary material specifications.

Following samples were checked:

Orange raw material specification:

Physical properties have been defined. E.g.,

Core ratio max.5%, 50mm diameter size ratio max.10%

Chemical properties, e.g., pH between 3.5 – 4.5, Brix: 11-15,

Microbiological properties: Coliform, E.coli, S.aureus, Salmonella, Listeria: 0, etc.

PE blue bag specification:

Width: 70cm, Length: 65cm, thickness: 80*2=160 micron

Migration limits are detailed.

All product specifications were defined in Product Specification. Total of 34 product description.

E.g., Frozen Cherry Tomato product description SP-01-05 r06 04.02.2026. All required information are available. E.g.:

Ingredients: Fresh cherry tomato

Origin: Turkiye

Brix°: Min.6 (7-9 target)

pH: 3,5-4,5

Microbial limits are defined. E.g., TVC: 100.000, Total coliform: max.1000, E.coli: <10, etc.

Temperature Checks: Final packed product temperature not to be warmer than -15°C.

Storage: Storage at -18°C or below.

Distribution Conditions: Goods should be loaded at -18°C via reefer trucks or containers.,

Shelf life: 2 years.

Consumer group: All consumer groups should eat. Additional info: This product is raw material to our customers. Once the product has been thawed, it should not be re-frozen. The product must be used after cooking instruction which is minimum 72°C and 2 minutes. The customer should store the product at -18°C or below. The customer must obey all the food safety rules when using our product.

There are no customer branded products.

Specifications is approved by customers via e-mail. E.g., Customer: D.O., product: IQF sliced cherry tomatoes, e-mails were seen during the audit, dated: 12.01.2026.

Specifications are reviewed at least once a year (during management review meetings).

Specifications are stored electronically.

3.7 Corrective and preventive actions

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The company has a documented procedure for the recording and investigation of non-conformances. Corrective and preventive action procedure PR-05 r05 02.01.2026. The procedure explains the corrections, corrective actions, preventive actions and root cause analysis in details.

Corrective and preventive action follow-up form F 012 (r02 02.01.2026) is used to monitor all corrective actions about internal audits, customer Complaints, external audits, nonconforming products, etc.

In the F 009 Corrective and preventive action form; the correction, corrective action, root cause, root cause analysis, responsables, confirming suitability and effectiveness and the dates are detailed.

E.g. customer complaint: "221306" / supplier's claim that the orange product identified in batch number 5346 is non-specification, complaint date: 28.01.2026, Root cause: The processed oranges had thick peels, The sorting and control process was not implemented effectively enough and The problem is a consequent of fruit physiology of year. Corrective and preventive action form: F 009, the NC has been closed on 17.02.2026 and the effectiveness of the corrective action was evaluated on 17.03.2026.

CA No: 26-01, CA Form F 009, date 09.01.2026, Action: The relevant personnel were reminded about hygiene rules and the use of hairnets.. The CA has been closed on 16.01.2026. Review of the effectiveness of corrective action was on 20.02.2026.

Responsible person of corrective actions: Erhan Özdil (FSTL)

The root cause analysis method is defined in the corrective and preventive action procedure PR-05.

All the root causes are detailed effectively. Root cause analyses are as a part of the procedure and corrective actions are also covers the root causes to prevent recurrence. Root cause analyses are done with F 009 Corrective action form. In the form it is asked minimum 3 sub-causes of the root cause.

3.8 Control of non-conforming product

There is an effective procedure for the control of non-conforming products: PR.04 r04 02.01.2026. Identification of NC product has been understood by workers, verified with interviews during the site tour. Management of any product returned to the site, records of destruction where a product is destroyed for food safety reasons and other details are explained in the procedure for the control of non-conforming products: PR-04 r04 02.01.2026..

Eg., If it is a product that is returned after a surplus shipment, the product is taken to the warehouses in the facility after the necessary controls and analyses are made. First of all, it is kept on behalf of the same customer in the relevant stocks, and if there is no resale with the customer, it is evaluated to ensure traceability with the product can be sold to a customer who accepts the same specifications.

E.g., If there is non-conformity in the raw material, it is not accepted, it is returned, or sometimes it can be accepted conditionally depending on the condition of the product.

If an inappropriate situation occurs during or after production, the situation is evaluated (minimum 2 people from the food safety team decide), and decisions are taken according to the situation such as reprocessing, destruction, conditional dispatch, quarantine.

If it happens after the shipment, the recall-withdrawal procedure is executed.

There were no nonconforming products during the audit.

3.9 Traceability

Traceability and recall procedure: PR-16 r07 31.05.2024 is in place.

Traceability in operational processes in the site is followed by product and raw material lot numbers. It has been observed that the intermediate labelling in the site and storages is done properly. The traceability system complies with the legal requirements of the countries of sale. The identification of inputs (including



primary packaging), intermediate/semi-finished products, partially used materials, finished products and materials pending inspection is sufficient to ensure traceability.

A traceability test has been completed by the lead auditor during the audit, and the test has been completed in less than 4 hours with %100 success. Mass balance is ok, and all relevant records were available:

Product name: Frozen Mandarin Segment

Lot no: 5317

Production date: 13.11.2025

Delivery date: 19.11.2025

Input amount: 6550 kg = Delivery amount: 5040 kg + stock amount: 0 kg + wastage amount: 1510 kg

Raw material acceptance form F 026-37, Mandarin; date – lot – amount: 13.11.2025 – 01 – 16632 kg,

Packaging material acceptance form F 025-02 Carton boxes, date:13.10.2025, supplier: Dentaş Ambalaj, amount: 10000 pieces, controls are ok.

Packaging material acceptance form F 025-07 PE bags date:07.11.2025, amount: 516 pieces, supplier: Bil Plastic, controls are ok.

Frozen product process control form F 041 dated 13.11.2025, washing water controls were done hourly, chlorine: 3ppm, foreign material, colour, taste, odour, center of product temperature is checked hourly: 1h = -18,2°C, 2h = -18,1°C, 3h = -18,3°C, 4h = -18,3°C, etc.

IQF CCP monitoring form F 056 dated 13.11.2025, checks are done twice a hour: 08:30-09:00 – room1: -28°C, room2: -30°C, product: -21; at 09:00-09:30 room1: -29°C, room2: -30°C, product: -22°C, etc., checked by Alihan Ateş, Approved by Tuğba Yener Serdar.

Frozen product final control form F 042-37 dated 13.11.2025, foreign material, rot, physical damage, texture, temperature (limit: -18°C), amount of product, etc. Controls are ok.

Metal detector control form F 040 dated 13.11.2025, controls have been done hourly (08:30, 09:30, 10:30, 11:30), 2,5mm Fe, 3,2mm Non-Fe, 3.2mm, all controls are ok, records are approved by Tuğba Yener Serdar.

X-ray Control form F 121 dated 13.11.2025, controls have been done in every 2 hours (08:30, 10:30, 11:30), SL Glass: 2.5 mm, Ceramic: 2.5 mm, SS: 1.0 mm, all controls are ok, records are approved by Tuğba Yener Serdar.

F 091 Magnet control form dated 13.11.2025, at 08:30, 09:30, 10:30, 11:30 all controls are ok, nothing has been detected.

F 063-37-01 Production line control form, sieves control etc.Date:13.11.2025, all controls are ok.

F 036 Line Cleaning Control Form, Date:13.11.2025, all controls are ok.

F 057 Personnel Hygiene Control Form, Date: 13.11.2025, all controls are ok.

F 065 Daily Glass and Fragile Material Control Form, Date:13.11.2025, all controls are ok.

Mass balance is ok. (input amount (6550 kg)= delivery amount (5040 kg) + wastage (1510 kg)

The company conducts 2 separate traceability tests from product to raw material and from raw material to product at least once a year. E.g.:

From final product to raw material:

Test date: 05.03.2026

Product: Frozen Orange Segment

Production date: 08.01.2026, final product lot no: 6008

Delivery date: 23.01.2026

Total delivery amount: 22000 kg

Raw material lot no: RM2026016

Receiving date: 06.01.2026, amount:17258 kg

Raw material lot no: RM2026017

Receiving date: 07.01.2026, amount:17749 kg

Packaging material acceptance form F 025-07 PE bags date:10.12.2025, amount: 1486 pieces, supplier: Bil Plastic, controls are ok.

Process control form F 041 dated 08.01.2026

Final quality control form F 042-44 dated 08.01.2026

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Metal detector verification form F 040 dated 08.01.2026

X-ray control form F 121 dated 08.01.2026

All operational records are available.

Mass balance is ok. (input amount (29000 kg)= delivery amount (22000 kg) + wastage+ peel (7000 kg)
Total test duration: 62 minutes

From raw material to final product

Test date: 16.02.2026

Product: Figs Blue Dices

All operational records are available.

Total test duration: 50 minutes

3.10 Complaint-handling

Customer complaint and satisfaction procedure PR-26 r02 02.01.2026 is implemented. Quality responsible investigates problems and actions are taken. Reasons of complaints had been evaluated and grouped.

5 complaints received in 2025 and corrective action needed for the 5 of them.

3 complaints received in 2026 until the audit date and corrective action needed for the 3 of them.

Customer Complaints are recorded on F 022 r02 02.01.2026, corrective actions of the complaints are recorded in F 009 Corrective and preventive action form.

The following sample was reviewed during the audit:

E.g. customer complaint: "221306" / supplier's claim that the orange product identified in batch number 5346 is non-specification, complaint date: 28.01.2026, Root cause: The processed oranges had thick peels, The sorting and control process was not implemented effectively enough. Corrective and preventive action form: F 009, the NC has been closed on 17.02.2026 and the effectiveness of the corrective action was evaluated on 17.03.2026.

Tuğba Yener Serdar (Quality Chief), Erhan Özdil (Food Safety Team Leader) and Ersegün Sarı (General Coordinator) are responsible for customer complaints evaluations.

A customer satisfaction trend analysis has been documented. Most complaint is about foreign matter issues and root cause in general is staff carelessness.

The improvements are done due to the same type of complaints and trending of complaints is done yearly in management review.

3.11 Management of incidents, product withdrawal and product recall

Emergency procedure-PR.29 has been created. Emergencies and actions to be taken have been defined in the procedure.

Emergency plan PL-14 rev03 02.01.2026 has been documented. The plan includes emergencies and actions to be taken. (disruption to key services such as water, energy, transport, refrigeration processes, staff availability, and communications; events such as fire, flood or natural disaster; sabotage; product contamination indicating a product maybe unsafe or illegal; cyber security etc. detailed in the plan)

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The company has a plan and system in place to effectively manage incidents and enable the effective withdrawal and recall of products should this be required. Traceability and recall procedure: PR-16 r08 02.01.2026.

Emergency contact list F-075 rev02 02.01.2026 updated on 02.03.2026.

Some tests are done for the incident management procedures annually.

E.g. Cyberattack test, date:12.03.2026, the test report has been seen and the fishing mail seen for the cyberattack. The cyberattack test is successful.

E.g. Fire fighting, protection, rescue, evacuation test report, date:05.03.2026, Hour:13:00, the test has been finished on 17:00. The test is successful.

E.g. A recall test was conducted by company on 12.03.2026

Complaint date /time: 12.03.2026 11:24

Product: IQF Orange Chunks

Lot no: 020255

Amount: 20880 kg

Production date: 15.12.2025

Delivery date: 31.12.2025

Test start time 11:25, finish time: 13:15. The test took a total of 110 minutes. All steps, actual hours and durations are defined in the test report. The test resulted in 100% success.

The company will report the CB in 3 days in the time of recall. The company shall then provide sufficient information to enable the certification body to assess any effects of the incident on the ongoing validity of the current certificate within 21 calendar days. As a minimum, this shall include corrective action, root cause analysis and a preventive action plan. All these situations are detailed in Traceability and recall procedure: PR-16 r08 02.01.2026.

No-real recall situations have happened.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
3.5.1.5	All raw materials are purchased from farmers. No purchasing from brokers.
3.5.4	No outsourced process.
3.6.3	There are no customer branded products.
3.9.4	There is no rework.

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4. Site standards

4.1 External standards

The site is of suitable location and construction to permit maintenance and to allow the production of safe and legal products. Adequate external controls are provided to protect the final product from potential hazards. Periodic site visits also include external area controls, in this way it is monitored whether there is a change in the eligibility conditions.

The condition of the site allows the production of safe and legal products. External areas are in good order. The company has demonstrated that the building fabric is adequately maintained. There are no local activities that could potentially adversely affect the products by introducing contamination to the products. The company is located in an urbanised section of Kestel, Bursa. There are also some machinery and equipment companies around. The roads are well maintained. Natural drainage is adequate. External traffic routes were suitably surfaced and in good repair.

The main product is frozen fruits and vegetables. Production equipment includes blades, blanchers, and IQF freezers for vegetables, and blades and IQF freezers for fruits.

Only authorized persons can enter the production and storage areas by security. At the entrance to the site, the security staff keeps a visitor record. There is a card entry system at the entrance to the field, there is no uncontrolled entry, it is provided with the entry cards given by the security personnel. Visitors from outside are allowed to enter with an accompanying person. Each employee's card is defined for the entrance door of the area he is responsible for. Access to production and storage areas is not possible without these access cards. Visiting Rules and Visitor Health Questionnaire Form (F 034-1, Rev02, 02.01.2026) is used for all visitors etc. entering the facility, it contains necessary warning information.

4.2 Site security and food defence

Food Defence Training has been provided on 04.11.2025, duration 2 hrs, by Tuğba Yener Serdar, 64 people attended.

Food Defence team chart: TPŞ-01 r03 02.03.2026 updated on 02.03.2026

Team Leader: Erhan Özdil (Quality Manager), Members: Tuğba Yener Serdar (Quality Chief), Emre Kamiloglu (Vice General Manager), Ersegün Sarı (General Coordinator), Adem Kantaş (Agricultural Purchasing Manager), Seyrullah Özgür (Production Manager), Elif Göktürk (Quality Responsible), Mahmut Yüksel (Technical Manager), Taner Murat Parlak (Agricultural Purchasing Responsible), Özden Gündoğan (Production Chief), Sadiye Birgül (Production Engineer), Oğuzhan Kurtuluş (Production Engineer), Alihan Ateş (Quality Responsible. Team assignment letter is available dated: 02.03.2026.

The individuals responsible for completing threat assessments and food defence plans were found to have appropriate knowledge and competence.

TACCP-Food Defence Instruction (ÜTL-45, r02, 02.01.2026) has been documented. Internal and external hazards Risk analysis was carried out within the scope of TACCP Food Defence Risk Analysis (F 069, r02, 02.01.2026), updated date: 02.01.2026 and the risk analysis is reviewed monthly and the last review date was 13.03.2026. The measures within the food defence plan have been deemed adequate considering the location of the site and its surroundings. Risks originating from personnel, external visitors, etc. specific to the facility entrance (raw material and auxiliary material input), storage production areas and shipping areas, external areas, cargo services, etc are controlled. E.g., damage to the product by the personnel working in the company, preventive action: personnel records, security cameras, etc. Actions are sufficient. The food defence plan is met legal requirements in the country in which it is intended for sale or use.

There are total of 48 security cams in the company. Records are kept for 7 days. Plant is authorised by Turkish Food, Agriculture and Animal Ministry.

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4.3 Layout, product flow and segregation

Risk areas identification form F 118 r01 02.01.2026, production areas have been defined as low risk areas and closed areas.

PL 06 Process Layout Plan (r06, 02.01.2026) is kept up-to-date to include personnel entrances, input locations and directions including packaging, personnel movement directions, waste disposal, production process, etc.

The facilities have an adequate design to prevent the risk of product contamination. A site map has provided detailing access points for personnel, travel routes and location of staff facilities and the areas with the different levels of risk. Information about the access to the facilities has been provided to visitors and external staff. The delivery of this information is documented. The process flow of product through the site is arranged to minimize the risk of product contamination. Separate rooms are in place for reception, storage, processing, packing and storage. Effective physical separation is in place between production areas. There is effective segregation of the various processing operations, and this takes into account the flow of product, nature of materials, equipment, personnel, airflow, air quality and services provision. Sufficient working space is provided for all operations. Dedicated intake areas are provided for different raw materials.

Visitor registration form for production areas F034-01 includes all required information, rules and health questions for visitors.

There is no temporary structure in the company.

4.4 Building fabric, raw material handling, preparation, processing, packing and storage areas

The facilities are suited to the production process without generating food safety problems. Walls, floors, ceilings and overhead structures are maintained in good order. Walls are made of panels, floors are made of epoxy and ceilings are made concrete and panels.

Drainage is sited so as to avoid contamination.

There are high walking places in the IQF line, they are clean and easy to clean.

Opening windows are protected against pests. Bulbs, electric fly killers and strip lights were protected against breakage.

The external doors are designed to prevent pest ingress except minor NC 4.4.8.

Suitable and sufficient lighting provided for correct operation of processes, inspection of product and effective cleaning.

There is no dust forming.

There are 4 plastic strips in the company which are in the entrance of the cold storage areas. Plastic strip curtains is in good condition, clean, fitted correctly and not pose a food safety risk.

Minor NC 4.4.8: There was a gap under the shipping door.

4.5 Utilities – water, ice, air and other gases

Well water is used. Documented practices related to water use have been checked, and there is no use of ice, air, or other gas in the facility. Water analysis frequencies have been determined based on risk analysis. Water Analysis Risk Assessment Plan (PL 15, r02, 02.01.2026). Frequency of water analysis

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used in machine equipment cleaning: 1 in 6 months, water used in raw material washing: 1 in 3 months, water used in hand washing: 1 in 6 months, etc.

Sampling plan has also been documented: PL 16 r02 02.01.2026, planning date:02.01.2026. Taps and two water sources (well water and mains water) are associated.

Following analysis reports were checked:

E.g., water analysis used in machine equipment and in raw materials, date: 10.03.2026, parameters: Fecal enterococci, TPC, E.coli, Coliform, and chemical analysis and physical analysis, results are ok, by Nano Lab accredited by TURKAK (AB-0566-T).

E.g., radioactivity analysis on water is done on 05.03.2026, results are ok. By Radkor.

Water distribution plan is available: PL 13 r01 02.01.2026.

Compressed air is used as cleaning issue.

Gases are not in use.

4.6 Equipment

Equipment management procedure PR-31 r02 02.01.2026

Production, technical and engineering staff are involved in reviewing and specifying new equipment for suitability. Commissioning trials are the responsibility of the company supplying the equipment before acceptance is confirmed.

The majority of equipment is manufactured from stainless steel. Replacement parts, such as conveyor belts, are food grade.

E.g., The certificate of conformity for the Burter HY2208 model pallet truck with scale, purchased on 19.08.2025, was reviewed. Equipment number: ÜGK16, Date: 19.08.2025

While commissioning new equipment, F 029 New Equipment Evaluation Form is used. Last equipment bought by the company is Metal Detector. E.g. Date: 20.08.2025, Equipment Name: Metal Detector, supplier: Mesutronic MN 7.0 CI. The results of the food compatibility question list of the materials used are suitable. It has been decided that it does not pose a new hazard and that there is no need for a change in the HACCP and flow chart. The evaluation was done by Tuğba Yener Serdar, approved by Emre Kamiloğlu, and new equipment was accepted.

New equipment installation instruction TL11 r01 02.01.2026 describes in detail the requirements during equipment installation.

The instruction explains details of the new equipment installation in the company with risk assessment. F 029 New Equipment Evaluation Form is used for this risk assessment such as Chemical, microbiological, physical, and neurobiological factors; the nature and known characteristics of the food contact surface; the length of contact time; the nature of the food and its contamination potential. If the score is 0-3 it is low, if the score is 4-6 middle, if the score is 7 it is high risk.

Static equipment handling instruction TL12 r01 02.01.2026, includes details on what to do when static equipment needs to be moved. To prevent food safety risks and maintain equipment integrity during the transport of static equipment, the equipment is properly cleaned and maintained, precautions are taken to prevent impact and contamination, and transport operations are carried out in a controlled manner in accordance with established procedures.

Out-of-use equipment control instruction TL13 r01 02.01.2026 has been documented and implemented. It also includes what needs to be done before it can be used again. The out of use equipments are stored clean and tidy.

Mobile equipments such as transpallets, forklifts are in good conditions except minor NC 4.6.6.

Battery charging equipment is not kept in the open production area. A field is also defined in the shipping area and is maintained there. Battery charging equipment and control of batteries are included in the Equipment Management Procedure.

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Minor NC 4.6.5: It was been determined that the apricot kernel extraction machine in the production area was not labelled as out of service.

Minor NC 4.6.6: It was determined that the paint on one of the forklift in the outside loading area was peeling.

4.7 Maintenance

Annual Maintenance Plan (PL 03), compressors, condensers, pumps, chillers, chambers, tunnels, IQFs, transformers, panels, scales, flanger, peelers, optical sorters, metal detectors, wash basins, straw walkers, drums, cutting machines, selection-conveying belts, elevators, scales, filling machines, duct tape machines, magnets are included in the plan and annual and monthly maintenance frequencies for each equipment are defined on 09.01.2026 for year 2026. Equipment and cleaning controls are carried out continuously in line controls. The plan covers all plant, processing equipments and mobile equipments.

Temporary and permanent maintenance-repair records are kept with Fault Notification Forms (F 028). E.g. A fault notification was issued on 26.09.2025 for the FAM cutting machine, as it was unable to perform the cutting operation. Responsible: Cihan Afşar.

On the basis of equipment, maintenance histories can be monitored with the Machinery Registration Card (F.027).

E.g. IQF (Code: SGG2) 28.02.2026 (Period: monthly) general control, electrical connections control, emergency stop replacement maintenance-repair records were examined. Planned and malfunction-related maintenance, post-maintenance cleaning and equipment control are recorded. This is an internal maintenance.

E.g. Sortex maintenance (machine code: ÜGC1) have been done on 27.02.2026. (Period: monthly). This is an internal maintenance.

E.g. Compressor maintenance (machine code: SGA5) have been done on 09.03.2026. (Period: monthly). This is an internal maintenance.

E.g. Blanche maintenance (machine code: ÜGA1) have been done on 25.02.2026. (Period: monthly). This is an internal maintenance.

E.g. Metal detector maintenance (machine code: ÜGD1) have been done on 08.3.2026. (Period: yearly). This is an internal maintenance.

E.g. X-ray maintenance (machine code: ÜGD2) have been done on 18.03.2026. (Period: monthly). This is an internal maintenance.

E.g. Sortex maintenance have been done on 26.03.2025 by ATS. This is an external maintenance.

E.g. Compressor maintenance have been done on 24.09.2025 by BUMARK. This is an external maintenance.

Engineering workshop: There are controls in place in engineering workshop. The engineering workshop is remote from production areas.

Regular controls to verify its condition are carried out. Machine equipment maintenance control: temperature indicator tested, automatic shutdown system tested, all controls OK. The cleaning is done after the maintenance.

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Mahmut Yüksel (Technical Manager) is responsible from maintenance, engineering and repair operations.

Lubricants are food grade, E.g. Molyslip Arvina FM2, NSF International / Nonfood Compunds Registration Program approval has been checked.

No temporary maintenance materials were observed during the audit. The company has a documented procedure in place for managing temporary repairs where required.

4.8 Staff facilities

Changing rooms, canteen, hand washing facilities and toilets are sufficient to accommodate the required number of personnel, designed and operated to minimise the risk of product contamination. These facilities are maintained in good and clean condition. Dressing rooms have got direct access to the production, packing or storage areas without recourse to any external area. Storage facilities are of sufficient size. Outdoor clothing and other personal items are stored separately from workwear within the changing facilities. Facilities are available to separate clean and dirty workwear.

Suitable and sufficient hand-washing facilities provides sufficient quantity of water at a suitable temperature, liquid soap, single use towels or, suitably designed and located air driers, water taps with hand-free operation, advisory signs to prompt hand-washing. Toilets are adequately segregated and don't open directly into production, packing and storage areas. Toilets are provided with hand-washing facilities comprising basins with soap and water at a suitable temperature, adequate hand-drying facilities, advisory signs to prompt handwashing. Controlled smoking areas are provided which are both isolated from production areas. Personnel cannot bring food into the company. No food is taken into storage, processing, or production areas. Eating of food is allowed outside. The meals are brought prepared by the catering company and served in the dining hall. Production staff are trained on allergens. Catering facilities are present; food consumption is restricted to designated areas, no food is allowed in production zones, and hygiene controls are applied to prevent microbiological and allergen contamination.

4.9 Chemical and physical product contamination control: raw material handling, preparation, processing, packing and storage areas

4.9.1 Chemical control

Adequate facilities and documented procedures have been provided to control the risk of physical and chemical contamination.

TTL07 Chemical Storage Instruction r02 02.01.2026 has been documented.

Chemical information Registration Form (F 100) has been updated on 02.01.2026, the products in the chemical list and the content of the list were verified during the visit to the chemical storage.

MSDSs are available in the warehouse and at the quality officer. MSDSs are published by Kersia. E.g. Foam CL 520 (for equipment surfaces), DEPTIL MAINS (hand soap), DEPTIL HDS-TR (hand sanitizer) dated 02.01.2026

Training on Cleaning and Using Cleaning Chemicals and Materials, Date: 09.03.2026, Participants: 40 Duration: 1 hours, Trainer: Raşit Acaroğlu from Kersia Company.

Strongly scented or taint-forming chemicals are not used.



4.9.2 Metal control

There is a documented metal policy POL-05. Foreign material control instruction TL-05 r04 02.01.2026 is implemented. Staples and snap of knives are not used. Knives are used for manual chopping of fruits. Each knife is numbered and delivered to staff each morning and collected at the end of the day. Knife delivery records are recorded on Auxiliary equipment control form F 066, records were checked for dates 13.11.2025 (knives are checked daily)

Knives are cleaned daily and recorded on Cleaning Control Form (Packaging Process Area) F 036. Date: 13.11.2025, controls are ok.

In addition, the cutting parts of the equipment are checked 6 times at the beginning, at the end and during production. Production line control form F 063-39 checked for date 13.11.2025.

4.9.3 Glass, brittle plastic, ceramics and similar materials

All glass materials in production areas are covered with unbreakable film against breakage. Glass, hard plastic and wood policy POL-04. Glass and rigid plastic material inspection plan PL 07 rev04 02.01.2026. It includes the locations of the materials, codes, control frequencies, responsible and where checks are recorded. Glass material / hard plastic security control form F 065. Records were checked.

Personnel have been trained on what to do in case of glass breakage: Date: 18.11.2025, Participants: 33, Trainer: Tuğba Yener Serdar- Seyrullah Özgür.

Glass, hard plastic, wood and cutting tool inspection instruction TL-07 r04 02.01.2026. It includes what to do in case of breakage. Breaks are recorded on Glass - Hard Plastic break cleaning form F 032. No breakage so far.

Glasses in the company checked with F 065, 13.11.2025 records were checked.

In addition, the glasses used by the personnel are checked daily. Personal glasses-lens control form F105, 13.11.2025 records were checked.

All glass materials in production areas are covered with unbreakable film against breakage.

4.9.4 Products packed into glass or other brittle containers

N/A: Products are not packed in glass or other brittle materials

4.9.5 Wood

Glass, hard plastic, wood and cutting tool inspection instruction TL-07 r04 02.01.2026 is implemented. There is no use of wood other than pallets. Glass, hard plastic and wood policy POL-04 rev01 01.09.2021. Wooden pallets controls are done daily based on risk analysis and recorded on Glass material / hard plastic security control form F 065, 13.11.2025 records were checked.

4.9.6 Other physical contaminants

The packaging visually checked for any potential sources of contamination. Where packaging is removed from raw materials prior to use, the packaging responsible knows how to do so without creating a contamination hazard to the raw material.

BRC-compliant pens are used. Pens in open product areas are designed without small parts and detectable by foreign-body detection equipment.

Control of portable handheld equipments (mobile phones, tablets etc.) are explained in TL-04 Hygiene Instruction.

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4.10 Foreign-body detection and removal equipment

4.10.1 Selection and operation of foreign-body detection and removal equipment

Effective equipment for the elimination or detection of foreign bodies is available. The need for detecting or removing contamination from foreign bodies has been assessed within HACCP. Foreign body detection system: X-ray, Metal detector, magnets, sieves, sortex. Additionally, the organization applies visual checks for the control of foreign bodies.

Foreign material control instruction TL-05 r04 02.01.2026 includes the type, location, and sensitivity of the detection and/or removal method.

Control frequencies are defined for foreign matter detection equipment (X-ray: in every 2 hours, metal detector: hourly, magnet: hourly, sieves: before production, after production and 4 times during production, sortex: daily). If there is a deviation/malfunction in the foreign matter detection equipment, all products after the last check are quarantined, and a recheck is applied after the equipment starts working.

Foreign substances detected in production lines and areas are recorded on the foreign substance registration form: F 006

Foreign materials detected by foreign matter separation equipment are recorded in the section reserved in the relevant equipment control forms. E.g. F 091 Magnet control form dated 13.11.2025, at 08:30, 09:30, 10:30, 11:30 nothing has been detected.

The last metal found was on 05.03.2026, that was 0,1 g, with Metal detector control form F 040.

4.10.2 Filters and sieves

Filter is not used.

There are 25 sieves are used.

Foreign material control instruction TL-05 r04 02.01.2026 is implemented. Sieve controls are recorded on Production line control form F 063-37-01 dated 13.11.2025, checks are done before production, after production and 4 times during production.

The sieves are designed with appropriately sized apertures, taking into account the specific characteristics and size of the product.

4.10.3 Metal detectors and X-ray equipment

Hazard analysis has identified the need for a metal detector installation. Additionally, the organization applies visual checks for the control of foreign bodies. Metal detection is used for all finished products. The monitoring of the metal detector includes test samples for Fe-2,5mm, Non-Fe-3,2mm, and SS-3,2mm.

X-ray equipment is used for all finished products. The monitoring of the X-ray includes test samples for SL Glass: 2.5 mm, Ceramic: 2.5 mm, SS: 1.0 mm.

The metal detector has an automatic alarm and belt stop system. There are documented procedures specifying all corrective actions appropriate in an event of a metal or a foreign body detection. In case of rejection, the stock is isolated, quarantined, investigated, and retested.

Metal detector control is done by the quality control personnel with test sticks before and during each production and hourly during production.



E.g., in Metal detector control form F 040 dated 13.11.2025, controls have been done hourly (08:30, 09:30, 10:30, 11:30), 2,5mm Fe, 3,2mm Non-Fe, 3.2mm, all controls are ok. The last metal found was on 05.03.2026, that was 0,1 g, with Metal detector control form F 040.

Metal detector calibration, date:25.02.2026 by Kalmer.

X-ray control is done by the quality control personnel with test sticks before and during each production and hourly during production. E.g., in X-ray Control form F 121 dated 13.11.2025, controls have been done in every 2 hours (08:30, 10:30, 11:30), SL Glass: 2.5 mm, Ceramic: 2.5 mm, SS: 1.0 mm, all controls are ok.

X-ray validation is done on 17.10.2023 with F068-1 Validation Form in the company.

X-ray validation certificate, date:24.11.2025 by Mercury

Foreign material control instruction TL-05 r04 02.01.2026, Metal detector operating instruction ÇTL-46 r05 02.01.2026 and X-ray operating instruction ÇTL-52 r01 02.01.2026 are implemented.

The metal detector and X-ray tests were performed properly and verified to be working during the audit.

The last metal found was detected on 11.03.2026 as 1.0 g and confirmed with the F 091 Magnet control form.

4.10.4 Magnets

There are 3 magnets. Magnets are portable. Magnets are placed relevant to the processed product: before IQF, after IQF and after sortex. Tests are available for each magnet.

Magnets are used for capturing ferromagnetic impurities (iron, metal particles, etc.) and prevent physical contamination of the product.

Date: 15.09.2025

Magnet number: N35-NdFeB

Strength: 4440 Gauss

Tests have been done by Ege Magnet.

Magnet controls are done hourly. E.g., F 091 Magnet control form dated 13.11.2025, at 08:30, 09:30, 10:30, 11:30, nothing has been detected, controls are ok.

The last metal found was on 11.03.2026, that was 1,0 g, with F 091 Magnet control form.

4.10.5 Optical sorting equipment

There is a color sorter located in production area after IQF, before packaging step. External maintenance is done yearly. Last report was checked: dated 26.03.2025 by ATS. This is an external maintenance.

The company is also done maintenance for sortex monthly: Sortex maintenance (machine code: ÜGC1) have been done on 27.02.2026. (Period: monthly). This is an internal maintenance.

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

N/A Glass jars, cans and other rigid containers are not used.

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4.10.7 Other foreign-body detection and removal equipment

N/A Other foreign-body detection and removal equipment, such as gravity separation, fluid bed technology or aspirators are not used.

4.11 Housekeeping and hygiene

The company has implemented adequate cleaning and housekeeping systems to minimise the risk of product contamination. General cleaning instruction TTL-01 r05 02.01.2026. The premises and equipment are maintained in a clean and hygienic condition.

Documented cleaning procedures are in place and following evidence have been checked.

Cleaning plan PL-12 r11 02.01.2026 includes frequency, method, responsible corrective action are defined. Cleaning frequencies have been determined based on risk analysis, included in TTL-01

All the controls such as microbiological and pathogenic controls are listed. 4 different zone have been determined. Analysis frequencies are determined according to the risk analysis. In addition, sampling plan is also available. Target organisms are: Salmonella, E.coli, coliform bacteria, aerobic colony, mold and yeast. Swabs are done with sampling protocol. Sample locations are air in the filling area, packaging machine surface etc. Swab analysis done in every 6 months for zone 1, once a year for Zone 2,3, once every 2 years for Zone 4. These are checked during the audit:

Cleaning control form F 036 r07 02.01.2026, January 2026 records were ok (Cleaning responsible and verification signatures are included).

Cleaning effectiveness is monitored with SWAP analysis. E.g., wobbling internal surface swap analysis dated 09.03.2026, report number: 42612319/00, parameters: E.coli, Coliform, Listeria, Aerobic colony, Salmonella, results are ok, analysis done by SGS (AB-0726-T).

Cleaning equipment were properly identified, stored and cleaned in a hygienic manner to prevent contamination.

4.11.7 Cleaning in place (CIP)

N/A No CIP.

4.11.8 Environmental monitoring

Risk-based environmental monitoring programme has been implemented against pathogens and spoilage organisms. Cleaning efficiencies are approved. Corrective action is taken when monitored results indicate a failure to meet a control limit or when monitored results indicate an upward trend of positive results have been documented.

Environmental Monitoring Plan: EMP-01 r01 02.01.2026

All the controls such as microbiological and pathogenic controls are listed. 4 different zone have been determined. Analysis frequencies are determined according to the risk analysis. In addition, sampling plan is also available. Target organisms are: Salmonella, E.coli, coliform bacteria, aerobic colony, mold and yeast. Swabs are done with sampling protocol. Sample locations are air in the filling area, packaging machine surface etc. Swab analysis done in every 6 months for zone 1, once a year for Zone 2,3, once every 2 years for Zone 4. These are checked during the audit:

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Equipment interior surfaces, personnel hand, packaging interior, ambient air, compressor air:

E.coli, Listeria, Salmonella 1 in 3 months

Coliform, Aerobic colony, mold yeast, 1 in 6 months

Following reports were checked:

Personnel hand (Ç.T.): 17.03.2026, parameters: Salmonella, Coliform, Listeria, Aerobic colony, by Merieux, results are ok.

Personnel hand (S.D.): 23.09.2025, parameters: Salmonella, E.coli, Coliform, Listeria, Aerobic colony, by SGS, results are ok.

Personnel protective clothes (Y.G.): 08.12.2025, parameters: Salmonella, E.coli, Coliform, Listeria, Aerobic colony, by SGS, results are ok.

Wobbling internal surface swap analysis dated 09.03.2026, report number: 42612319/00, parameters: E.coli, Coliform, Listeria, Aerobic colony, Salmonella, results are ok, analysis done by SGS (AB-0726-T).

Compressed air: 19.03.2026, parameters: aerobic colony, yeast and mold, results are ok, analysis done by Merieux.

Packaging area ambient air: 19.03.2026, parameters: aerobic colony, yeast and mold, results are ok, analysis done by Merieux.

Corrective actions in case of deviation on monitoring results are defined in the environmental monitoring programme and environmental monitoring programme instruction TL 15 r01 02.01.2026.

The environmental monitoring plan is reviewed in Management review meeting.

4.12 Waste and waste disposal

The company has implemented a system for waste disposal. Formal agreements were available for waste disposal. Waste areas seen during the visit were in a suitable condition with all skips being suitably covered.

Packaging wastes are put in cages in covered area and taken outside the open production area with cover and potential risk to the product safety have been controlled by this. Vegetable wastes are put in vegetable bins and removed outside the open production area with cover and potential risk to the product safety have been controlled by this.

Environmental management system business contract with Mars Çevre Danışmanlık dated 02.01.2025 valid until cancelled.

Paper waste is collected by BURKASAN. E.g. date: 23.01.2026, total amount: 1120 kg

PE packaging materials waste is collected by BURKASAN. E.g. date: 23.01.2026, total amount: 520 kg

Hazardous wastes are collected by BURSA ENTEGRE ENERJİ San. ve Tic. A.Ş., date: 17.12.2025, total amount of contaminated packs: 500 kg

There are no unsafe products or substandard trademarked materials transferred to a third party for destruction or disposal.

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4.13 Management of surplus food and products for animal feed

In article 4.13 of the BRCGS Quality Manual (GGEK, rev04 04.01.2023), it is defined that customer branded products that are considered as semi-finished products are not packaged. Such products are not sold to personnel, etc., they are managed according to PR-04 in the status of non-conforming products. No products for animal feed.

4.14 Pest management

The company has minimized the risk of pest infestation by contracting a competent pest control company, named EGAM. Contract Date: 01.01.2026. The condition of compliance with legal requirements and food safety system requirements is defined in the contract. This company visits the site at least twice a month and in case of treatment needs to solve pest infestations. Their responsibility is to put pest stations, check their activities, create reports and take necessary actions together with the management of the site. The agreement covers rodent control (mice, rats, insects), crawling pests (ants, cockroaches, etc.), flying pests (houseflies, fruit flies, gnats, etc.), stray animal control, bird control, and outdoor garden pest control (locusts, spiders, aphids, etc.).

Tuğba Yener Serdar has been determined as the responsible person in the site. As a result of EGAM risk assessment, the frequency of control was determined twice a month. The risk assessment was last updated on 10.03.2026.

Pest and Rodent Control Training was given on 20.02.2026 by EGAM responsible İsa Özcan with the participation of 48 employees.

Last check dates: 17.03.2026, 04.03.2026, 19.02.2026, etc. The controls dated 17.03.2026 were carried out by Erkan Ügüdür and Abdulkadir Bayrak, Report No: P1074395, Toxic rodent monitors, EFC-electric fly catcher, Wall mounted EFC (EFCDT), flies inn (FIN), live capture monitor adhesive – (CYMY). No deformation or defect was detected.

The pest control company EGAM made a risk assessment for the potential ingress of the birds and roosting and nesting at loading or unloading areas. The pest control company makes the controls twice a month in the company, they check every part of the company for potential bird ingress and write recommendations about these topics. The company have daily checks for cleaning also, if birds are seen it is written in the report, not happened yet. The bird measures and controls are also done with PRP/Site Factory Inspection Form F.087 (it is done monthly), last performed at 03.03.2026.

The layout plan was checked over the EGAM database.

Trend analysis documents were analysed monthly with EGAM software. Trend analyses between October 2025 and March 2026 were examined. There were no serious cases of invasion.

Evaluation records of pest control activities throughout the year has been done on 02.01.2026 are reported by EGAM (Erkan Ügüdür).

Minor NC 4.14.5: Pest station no ÜR 5 which is located near the shipping door was not fixed.

4.15 Storage facilities

PR-13 r03 02.01.2026, frozen storage and shipping procedure is implemented. Packaging is stored away from other raw materials and finished products. It is seen that stocks are managed in accordance with the first-in-first-out come principle. Raw materials and finished products are stored at the custom warehouses. All pallets are suitably identified with the name of the product, production date, and best-before date. Products and packaging materials are stored away from walls.

Control of temperature and moisture during product storage is required. Temperatures are continuously monitored by the computer system and recorded every hour. If the temperature rises above the limit, the system turns itself off and the maintenance staff informs the quality unit. In order to maintain the temperature in the storages, the doors are kept closed, the product is protected, and the malfunction is eliminated.

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Daily technical activity report F 038 dated 19.11.2025, checks are done hourly. E.g. at 09:00 – room 1: -20,8°C room2: -20,5°C room3: -22,2°C room 4: -21,6°C
Controlled atmosphere storage is not required.
No external storage.

4.16 Dispatch and transport

Transportation Procedure PR-13 r03 02.01.2026 is implemented. Transport is contracted out. Procedures to maintain product safety and quality during loading and transportation are present and implemented. Vehicles are inspected before loading on the following aspects vehicle cleaning, and integrity. Inspection records are maintained.

E.g., Loading Form F 035 dated 19.11.2025, vehicle plate number 33 AKR 753, Destination: Belgium, amount: 20.880kg, vehicle cleaning control: ok, 1 in every 5 pallets, the product temperature is controlled: -19,8°C / -19,4°C / -19,5°C / -19,8°C / -18,5°C, -18,7°C– etc. Temperature control is required and during transportation, the temperature is monitored with data loggers in the vehicles. PR-08 (r04 02.01.2026) Purchase and supplier evaluation procedure is implemented. Transportation is hired, the company's own vehicles are not used. Transport companies' contracts were checked: Kınay Taşımacılık contract date: 01.01.2023 valid until cancelled. The standard requirements are included in the contracts signed with Kınay Taşımacılık.

Details of non-applicable clauses with justification

Clause/Section Ref	Justification
4.3.6	There is no temporary structure in the company.
4.4.5	Suspended ceilings are not used in the company.
4.4.10	No dust forming.
4.5.3	Air and other gases are not in use.
4.9.1.2	Strongly scented or taint-forming chemicals are not used.
4.9.4	Products are not packed in glass or other brittle materials
4.10.6	Glass jars, cans and other rigid containers are not used
4.10.7	Other foreign-body detection and removal equipment, such as gravity separation, fluid bed technology or aspirators are not used.
4.11.7	No CIP.
4.12.4	There are no unsafe products or substandard trademarked materials transferred to a third party for destruction or disposal.

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4.13.2	No customer branded products.
4.13.3	No products for animal feed.
4.14.3	The company does not undertake its own pest control.
4.15.4	Controlled atmosphere storage is not required.
4.15.5	No external storage

5. Product control

5.1 Product design/development

Product design and development procedure: PR-23 r02 02.01.2026.

The procedure details to formalise processes for new product development, (including changes to existing products, processes and packaging), to ensure it does not adversely affect the safety and legality of either the existing products or the new products themselves.

Trials will happen if any packaging technology changes occur. There is no new product and packaging style in the company yet. All standard packaging.

Hazard analysis is conducted for all new products that are incorporated in the scope of evaluation. Food safety team take responsibility on this step.

Production trials are validated by internal tests and, where appropriate, by sampling and review by clients.

As a rule of thumb products are provisionally given a shelf life in line with similar products. Shelf life is evaluated and verified from test and production samples. There is no new product from last BRC audit.

Shelf life testing includes organoleptic, microbiological and chemical testing. Shelf life records are F 071 reviewed. Following samples were checked during the audit:

E.g. Test start date: 16.08.2023

Production date: 14.06.2023

Product: frozen Strawberry

Standby time: 2 years (-20°C)

Last test is done: 21.08.2025, Microbiological analysis report number: 42545418/ 00, parameters: Aerobic Colony Count, E.coli, Listeria monocytogenes, Mold, Yeast, Coliform, S.aureus (all the parameters results are positive) by SGS Lab. AB-0726-T

The test has finished and it verifies 2 years shelf life.

E.g. Test start date: 10.12.2022

Production date: 05.11.2024

Lot No: 4310

Product: frozen sliced cherry tomato

Standby time: 2 years (-20°C)

Last test date for microbiological criteria is 10.12.2024: Microbiological analysis report number: 42471473/00, parameters: Aerobic Colony Count, E.coli, Listeria monocytogenes, Salmonella, Mold, Yeast, Coliform, S.aureus (all the parameters results are positive) by SGS Lab. AB-0726-T

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Last test for organoleptic is done on 06.03.2026.
The test still goes on.

5.2 Product labelling

Product labelling complies with the appropriate legal requirements and contains information to enable the safe handling, display, storage, and preparation of the product within the food supply chain or by the customer. Label control is done for each product in the final product process control form. In addition, the accuracy of the information is checked with the label approval form (F 033).

F 033 is used for label approval and signing. E.g: 13.11.2025, product: Frozen Mandarine Segment, origin: Turkey, Best before: 13.11.2027, lot no: L845317, approved by Sadiye Birgül (production department) and Elif Göktürk (Quality department).

Review of labelling information is done by QC department. No declarations specific to the consumer group. Label approval is received from the customer via e-mail. The sample correspondence was checked during the audit.

There are cooking instructions in the product specifications. E.g., Black Fig Specification SP-01-17 indicates that "This product is raw material to our customers. Once the product has been thawed, it should not be re-frozen. The product must be used after cooking instruction which is minimum 72°C and 2 minutes. The customer should store the product at -18°C or below. The customer must obey all the food safety rules when using our product".

The responsibility of the label informations are not customers or other second or third party companies.

5.3 Management of allergens

The company has allergen policy: POL-07 r01 01.09.2021

The company has implemented a documented instruction for ensuring allergen Management. Allergen risk Management instruction TL-03 r02 02.01.2026, the instruction also includes allergen substance list.

There are no allergens handled in the company. The risks of allergen contamination were evaluated in the hazard analysis: TA-01.

Last allergen training was held on 11.08.2025 by Tuğba Yener Serdar, training material used: allergen instruction TL-03 and allergen policy, 46 people attended.

There are only products that are allergens according to Japanese law: Orange and Apple.

If apple of orange goes to Japanese the labels will cover the allergen warnings.

Allergen management is carried out in accordance with legal requirements.

Employees are not allowed to bring food.

There is no specific allergen claim by the company.

5.4 Product authenticity, claims and chain of custody

Food fraud prevention team team chart: Ş-02 r03 02.02.2026 updated on 02.03.2026

Team Leader: Erhan Özdi (Quality Manager), Members: Tuğba Yener Serdar (Quality Chief), Emre Kamiloğlu (Vice General Manager), Ersegün Sarı (General Coordinator), Adem Kantaş (Agricultural Purchasing Manager), Seyrullah Özgür (Production Manager), Elif Göktürk (Quality Responsible), Mahmut Yüksel (Technical Manager), Taner Murat Parlak (Agricultural Purchasing Responsible), Özden Gündoğan (Production Chief), Sadiye Birgül (Production Engineer), Oğuzhan Kurtuluş (Production Engineer), Alihan Ateş (Quality Responsible). Team assignment letter is available dated: 02.03.2026.

The individuals responsible for completing vulnerability assessments were found to have appropriate knowledge and competence.

Food fraud prevention and risk analysis training has been provided on 17.10.2025, duration: 2 hrs, by Ersegün Sarı, 15 People attended.

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Systems are in place to minimise the risk of purchasing fraudulent or adulterated food raw materials and to ensure that all product descriptions are legal, accurate and verified. Procedures are implemented for acceptance of raw materials based on risk analysis. Food fraud risk analysis instruction ÜTL-46 r03 02.01.2026. Economic stability and legal status, business history, being a partnered-contracted-free supplier, direct control of raw materials, access to technical information, transparency, personnel competence, supplier's knowledge about counterfeiting, effectiveness of management systems, frequency of rejected products, supplier-based complaints, supplier country the level of corruption is taken into account.

Score between:

1-4 Low risk (measures are sufficient)

5-10 Medium risk (preventive activities are increased)

12 and above high risk (emergency, activity is stopped, action is taken immediately)

The risk analysis is done very detailed for all the suppliers. It covers all mandatory requirements in section 5.4.

Raw materials and packing materials are controlled according to their specifications on receipt. Raw material controls also include facts about adulteration or substitution by either analyses or sensorial inspections. Food Fraud Risk analysis: F 070 r03 02.01.2026, updated on 09.03.2026. The risk analysis is done in very detail for all the suppliers. No particular risk of adulteration or substitution was noted. Risk analysis is reviewed once a year during the Management review meeting.

E.g. Eren Plastik

Product: PE bag for frozen products (primer packaging)

Facing fraud in the past: no

Ease of Understanding: Difficult

Attractive economic reasons: No

Supply chain relevance and complexity: Close and uncomplicated

Control measures: Visual – migration

Is the supplier reliable: Yes

Possibility: 3, Severity: 2, Score: 6 (Medium Risk) Mitigation plan: visual control, migration analysis, raw material specification.

There is no claim on the label or on the final product packaging.

The company doesn't have any Organic or GLOBALG.A.P claim.

The company doesn't have any HALAL claim.

The company has KOSHER claim, certificate has been taken from STAR-K, the certificate is valid until 31.10.2026.

No claim on production method

5.5 Product packaging

Product packaging is adequate for the intended use and is stored in a hygienic manner. Receiving inspection is performed for each of the packaging materials received. Conformity declarations and migration analysis reports were available for primer packaging material.

Packaging instruction ÜTL-41 rev02 02.01.2026

Primer packaging is blue PE bag, (Bil Plastik Ambalaj); Migration analysis certificate: dated 28.07.2025 by LTS Lab. accredited by TURKAK AB-0351-T, report number: LTS.R.2025.03923, results are ok. (supplier: Bil Plastik Ambalaj).

Packaging line control form includes also packaging and labelling checks: F 099

There is no customer branded packaging materials. Blue PE bags are used. Packages that have been discontinued are collected by the contracted company as packaging waste. Paper waste is collected by BURKASAN. E.g. date: 23.01.2026, total amount: 1120 kg.

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5.6 Product inspection, on-site product testing and laboratory analysis

The company undertakes the analysis of parameters (physical, chemical and microbiological parameters) defined in the product specifications. 100 % of chemical, microbiological and pesticide analyses are done externally. Only physical and sensorial analyses are done internally. The laboratory in the site is in the production area and there are no risks to product safety. Analysis plan PL-09 r02 02.01.2026 has been documented.

The final product is analysed at each loading.

Heavy metal (lead, cadmium, nickel), Microbiological (Salmonella, Listeria, Aerobic colony, Mold-Yeast, Coliform, E.coli), Pesticide analysis (550+ active substances), Chlorate/perchlorate analyzes are done by external laboratories.

Following analysis reports were checked:

Frozen Sliced Cherry Tomatoes, lot: 5332, analysis date: 01.12.2025, report no: 42566249/00, parameters: Aerobic colony, Salmonella, Listeria, Mold Yeast, Enterobacteriaceae, E.coli, S.aureus, Results are ok. By SGS accredited by TURKAK AB-0726-T.

Frozen Sliced Cherry Tomatoes, lot: 5332, analysis date: 01.12.2025, report no: 42566250/00, parameters: Pesticides (550+ active ingredients), results are ok. By SGS accredited by TURKAK AB-0726-T.

Frozen Sliced Cherry Tomatoes, lot: 5332, analysis date: 01.12.2025, report no: 42566251/00, parameters: lead, cadmium, nickel, not detected. By SGS accredited by TURKAK AB-0726-T.

Frozen Sliced Cherry Tomatoes, lot: 5332, analysis date: 05.12.2025, report no: 42567175/00, parameters: chlorate and perchlorate, not detected. By SGS accredited by TURKAK AB-0726-T.

There are no out of specification results in the company yet. If out of specification results occur; depends of the result the product hold and retesting, giving information to the customer or possible product recall can happen; all these are detailed in the P.005 control of non-conforming product procedure.

Shelf life testing includes organoleptic, microbiological and chemical testing. Shelf life records are F.071 reviewed. Following samples were checked during the audit:

E.g. Test start date: 16.08.2023

Production date: 14.06.2023

Product: frozen Strawberry

Standby time: 2 years (-20°C)

Last test is done: 21.08.2025, Microbiological analysis report number: 42545418/ 00, parameters: Aerobic Colony Count, E.coli, Listeria monocytogenes, Mold, Yeast, Coliform, S.aureus (all the parameters results are positive) by SGS Lab. AB-0726-T

The test has finished and it verifies 2 years shelf life.

E.g. Test start date: 10.12.2022

Production date: 05.11.2024

Lot No: 4310

Product: frozen sliced cherry tomato

Standby time: 2 years (-20°C)

Last test date for microbiological criteria is 10.12.2024: Microbiological analysis report number: 42471473/00, parameters: Aerobic Colony Count, E.coli, Listeria monocytogenes, Salmonella, Mold, Yeast, Coliform, S.aureus (all the parameters results are positive) by SGS Lab. AB-0726-T

Last test for organoleptic is done on 06.03.2026.

The test still goes on.

There is an effective system to monitoring analysis results. All analysis results are monitored with the external analysis follow-up form F 072 rev01 02.01.2026. Trend analysis are updated every time a new analysis report arrives. Monitoring is done by Tuğba Yener Serdar.

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5.7 Product release

Control and Release Instruction ÜTL-48 r01 02.01.2026 has been documented and implemented. Controls are done by the Laboratory responsible and recorded on quality forms. Final controls are done by Production Responsible (amount control, packaging, production and expiry dates, physical and organoleptic controls, etc.). Products are released by the Quality Chiefs and the Production Manager only after quality records and analysis results reveal compliance with specifications. The release decision is recorded in the final product control form F042. Frozen product final control form F 042-37 dated 13.11.2025, foreign material, rot, physical damage, texture, temperature (limit: -18°C), amount of product, etc. Controls are ok.

5.8 Pet food and animal feed

N/A: There is no pet food in the company.

5.9 Animal primary conversion

N/A: There is no animal primary conversion in the company.

Details of non-applicable clauses with justification

Clause/Section Ref	Justification
5.2.3	The responsibility of the label informations are not customers or other second or third party companies.
5.3.5	There is no rework.
5.3.7	There is no specific allergen claim by the company.
5.4.5	There is no claim.
5.4.7	There is no claim.
5.8	No Pet food.
5.9	No animal primary conversion.

6. Process control

6.1 Control of operations

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The company has procedures that verify that the processes and equipment are capable of producing consistently safe and legal products with the desired quality characteristics. Production and technical management "sign off" plant specifications. Critical physical and chemical controls are monitored and recorded through the process. Heat indicators from freezing rooms, shock tunnel heat indicator, pre-cooling room, storage rooms are equipped with temperature/time recording devices fitted with suitable alarms and the temperature is monitored on an hour basis.

Corrective action and non-conforming product procedures are in place in the event of process failure. By means of Production Line Control Forms, product-based process conditions and features such as temperature, time, etc. are controlled.

Following process control records were checked during the audit:

Process control form F 041 is used for washing and freezing process parameters control records.

Frozen product process control form F 041 dated 13.11.2025, washing water controls were done hourly, chlorine: 3ppm, foreign material, colour, taste, odour, center of product temperature is checked hourly: 1h = -18,2°C, 2h = -18,1°C, 3h = -18,3°C, 4h = -18,3°C, etc.

IQF CCP monitoring form F 056 dated 13.11.2025, checks are done twice a hour: 08:30-09:00 – room1: -28°C, room2: -30°C, product: -21; at 09:00-09:30 room1: -29°C, room2: -30°C, product: -22°C, etc., checked by Alihan Ateş, Approved by Tuğba Yener Serdar.

Production Line Control Form F 063-37-01, Product: Frozen Mandarine Segment, Sieving (for foreign matter sieving and calibration), Elevator-I (mechanical transmission of stalkless products to the washing pool), washing pool (washing with chlorinated water), selection-sorting (Mold, rot, foreign matter removal after washing), elevator-II (handleless product cutting machine (automatic cutting), conveyor belt (transmission of the cut products to the elevator), elevator-III (mechanical transmission of the products to IQF), IQF Freezing (for 15 minutes) individual quick freezing), selection-sorting-II (block, rotten, shredded, etc. product sorting), filling-weighing-packing (filling, weighing, air removal in the box, sealing and banding), Metal detector (in the packaged end product), Palletizing / Storage (transfer of final products to cold storage with pallets) Date: 13.11.2025.

The IQF and sortexsetup screen is password protected. IQF operator is responsible for the setups; and for sortex Oğuzhan Kurtuluş and Ersegün Sarı are responsible for setups.

Those responsible for the use of the equipment have been trained. Training date: 24.10.2025, duration: 8hrs, trainer: Seyrullah Özgür, Tuğba Yener Serdar, Mahmut Yüksel.

No in-line monitoring device. Corrective actions in case deviation in equipment are defined in the nonconforming product procedure PR-04 r04 02.01.2026.

No exclusion from the audit scope.

6.2 Labelling and pack control

There is a formal process for the allocation of packaging materials to packing lines and control in the packing area which ensures that only the packaging for immediate use is available to the packaging machines. Documented checks of hygiene and of adjustments of the process in the production line have been carried out before commencing production and when changes to product. Label controls are carried out as part of operational processes.

Controls are made at the beginning of production, every 2 hours during production, packaging change and as a final control at the end of production. Packaging line control form includes packaging and labelling checks: F 099

E.g. date: 13.11.2025

Product: Frozen Mandarine Segment

Check times: 08:30, 10:30, 11:30

Example at 10:30 – weight control 1-10360 gr, 2-10380 gr, 3-10390 gr, 4-10380 gr

Label check: ok

Writing and prints: ok

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Expiry date: 13.11.2027

Lot no: 5317

Origin: Turkey

There was no product changeover during the audit. Since the products are generally seasonal, only tomatoes were available during the audit.

No online verification equipment.

6.3 Quantity, weight, volume and number control

The frequency of checks and the check methods ensure that the minimum requirements of legislation governing quantity verification are met.

Final product weight controls are done every 2 hours with 4 samples.

Packaging line control form includes packaging and labelling checks: F 099

E.g. date: 13.11.2025

Product: Frozen Mandarine Segment

Check times: 08:30, 10:30, 11:30

Example at 10:30 – weight control 1-10360 gr, 2-10380 gr, 3-10390 gr, 4-10380 gr

Label check: ok

Writing and prints: ok

Expiry date: 13.11.2027

Lot no: 5317

Origin: Turkey

Weight control form F058 dated 13.11.2025, checks are done for every pallet (one sample is checked for every pallet), E.g., Pallet no: 1 10380 gr, Pallet no:2 10380 gr, Pallet no: 3 10390 gr, pallet no:4 10380 gr (accepted weight: 9850gr)

No online check weigher.

6.4 Calibration and control of measuring and monitoring devices

Calibration Procedure (PR-09) is documented (Rev03, 02.01.2026).

The company has identified measuring equipment used to monitor product safety and legality.

The identified measuring equipment is calibrated to a recognized national standard. Calibrations are done in external laboratories and yearly.

PR-09 Calibration Procedure is in place and it explains the details of out of specification calibrations.

Calibration plan-PL.05 has been created.

Metal detector has been calibrated by KALMER on 25.02.2026

X-ray has been validated by MERCURY on 24.11.2025.

Monitoring and measuring equipments (scale, blancher, IQF temperature & moisture device, etc.) have been calibrated by accredited KAL-MET firm (accredited by TÜRKAK with accreditation AB-0017-K.)

Examples:

Blanche

Type 7200

Date:13.01.2026

Thermometer of the cold storage:

Serial no: DM3

Date:13.01.2026

IQF:

Serial No: FSK-2

Date:13.01.2026

Scale:

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Serial no: TR-15
Date:13.01.2026
There is no deviation in the trend of the calibration results.

In-house verification is performed on the thermometer used in packaging. The reference measurement thermometer used in the verification was calibrated by Kal-Met on 15.01.2026, Instrument: Pocket thermometer, Serial No: 1
Thermometer Verification Form (F.060), Date:13.11.2025, Hours: 08.30-09.30-...11:30, control results: passed.
In case of deviations, in case of erroneous measurements, the label "out of use" is marked. Repair, maintenance, repair and subsequent processes are detailed in the PR-09 Calibration Procedure

Details of non-applicable clauses with justification

Clause/Section Ref	Justification
6.1.4	No in-line monitoring device.
6.1.7	No exclusion from the audit scope.
6.2.4	No online verification equipment.
6.3.2	The qauntity of the product is not governed by legislative requirements.
6.3.3	No online check weigher.

7. Personnel

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

The company ensures that all personnel performing work that affects product safety, legality and quality are demonstrably competent to carry out their activity, through training, work experience or qualification. All relevant personnel, including agency-supplied staff, temporary staff and contractors, are appropriately trained prior to commencing work and adequately supervised throughout the working period.

Personnel engaged in activities related to control measures and critical control points have been trained on oPRP and HACCP, dates: 01-02.09.2025, duration: 16 hrs, by Tuğba Yener Serdar, 18 people participated.

The company has a comprehensive training program for all staffs. Annual training plan PL-01 for 2026 was seen, updated on 02.03.2026. Annual program and refreshment trainings are appropriate.

The following training records were checked during the audit:

Training participate and evaluation form F 014

Last allergen training has been provided on 11.08.2025 by Tuğba Yener, training material used: allergen instruction TL-03 and allergen policy, 46 people attended.

Labeling and packaging training has been provided on 10.07.2025, duration: 3hrs, by Seyrullah Özgür, 15 people attended.

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Personnel have been trained on what to do in case of glass breakage: Date: 18.11.2025, Participants: 33, Trainer: Tuğba Yener Serdar-Seyrullah Özgür.

Food Safety and Quality Culture training has been provided on 12.02.2026, duration: 4hrs, by Tuğba Yener Serdar, 69 people attended.

Personnel hygiene training dated 20.12.2025, duration: 2hrs, by Tuğba Yener Serdar, 52 people attended.

Training on Infections, Diseases and Conditions That May Prevent Working in Food Production Places,

Date: 23.12.2025, Duration 2 hours, Participant: 66, Trainer: Dr. Alper Özkutlu – Occupational Doctor.

Pest and Rodent Control Training was given on 23.02.2026 by EGAM responsible İsa Özcan with the participation of 48 employees.

Training effectiveness is monitored with observations, oral and written examinations, etc. There are training registration cards for each personnel.

An annual performance evaluation is made with the Personnel Performance Evaluation Form (F 055, r03 02.01.2026). E.g., Ç.T. performance evaluation on 26.12.2025, result: 3,0/4.00 (good), H.E. performance evaluation on 26.12.2025, result: 3,2/4.00 (good).

Minor NC 7.1.4: During the site audit, some employees did not demonstrate sufficient awareness regarding allergens in the interview.

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

There are documented standards for personal hygiene for employees, visitors, and contractors. Company personal hygiene rules are properly established. The site personal hygiene rules are communicated to staff by means of training, refresher training, and notice boards. Regular inspections are undertaken to verify compliance with hygiene standards. No issues are seen regarding compliance with hygiene policy. There was not any watch, jewelry, rings, etc. usage during the site visits.

The following document are checked during the audit:

Hygiene instruction TL-04 r04 02.01.2026

Inspections are undertaken to verify compliance with hygiene standards, frequency: Before entrance production areas at the morning and at the afternoon (after lunch break). Personnel hygiene control form F057, 13.11.2025 records were seen.

All staff is aware of handwashing requirements. Hand washing is done at every production entrance and when needed. There is a hygiene barrier at the production entrance.

Blue detectable plaster is used.

Metal detector control records were seen for the last batch of blue detectable plaster. Blue plaster metal detector verification dated 12.09.2025, F025-15, lot no: 02

Personnel medicine using rules have been defined in the personnel hygiene instruction TL-04.

7.3 Medical screening

ÜTL-47 Infectious Diseases Instruction (Rev01, 02.01.2026) has been documented.

Training on Infections, Diseases and Conditions That May Prevent Working in Food Production Places, Date: 23.12.2025, Duration 2 hours, Participant: 66, Trainer: Dr. Alper Özkutlu – Occupational Doctor.

Visiting Rules and Visitor Health Questionnaire Form (F.034-1) is used for all visitors etc. entering the facility, it contains necessary warning information.

If staff or visitors had an illness and return work after illness all these details recorded in F 074 Return to work after treatment form. And the details are explained in PRP Procedure.

In hygiene trainings according to Hygiene Training Legislation issued in Turkey have been given to all employees. This training is given by approved trainer. Hygiene training (given by approved external agency to Derya Berkdemir) on 09.03.2026.



7.4 Protective clothing: employees or visitors to production areas

All employees, visitors, and contractors entering into production areas wore adequate protective clothing. Documents are provided informing the employees, visitors, and contractors of the company's standards relating to the use of protective clothing instruction and related instruction for visitors. These standards are adequate in accordance with the risk assessment. Protective clothing has been provided a sufficient number for each employee. The design is adequate to prevent physical contamination: without external pockets and buttons. Suitable protective clothing is worn by employees, contractors and visitors entering to the production areas. The company has routine controls on protective clothes and equipment.

Protective clothes wearing procedure PR-17 r03 02.01.2026 is in place.

A sufficient number of protective clothing for all employees is provided in two pairs. Clothes are designed to prevent the risk of contamination of the product, hair caps, masks, aprons, disposable sleeves, boots, overshoes, earplugs, etc. are actively used. Clothes are changed once a day or as needed based on risk analysis (PR-17).

Protective clothing is washed in the in-house laundry, TTL-08 Laundry Washing Instructions r02, 02.01.2026 is implemented. Validation of instruction has been carried with swab tests.

Personnel protective clothes (Y.G.): 08.12.2025, parameters: Salmonella, E.coli, Coliform, Listeria, Aerobic colony, by SGS, results are ok.

Gloves are changed at each break. The food suitability certificate of the gloves was seen. Controls are recorded on the personnel hygiene control form.

Headphones are used as protective clothing that is not suitable for washing. Cleaning and disinfection method and frequency are defined in "Protective clothes wearing procedure PR-17" (It is cleaned with disinfectant at least once a day and its cleanliness is checked before each use). Control records are kept on cleaning control form F 057.

Details of non-applicable clauses with justification

Clause/Section Ref	Justification

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8. Production risk zones – high risk, high care and ambient high care production risk zones
8.1 Layout product flow and segregation in high-risk, high-care and ambient high-care zones
Not applicable
8.2 Building fabric in high-risk and high-care zones
Not applicable
8.3 Equipment and maintenance in high-risk and high-care zones
Not applicable
8.4 Staff facilities for high-risk and high-care zones
Not applicable
8.5 Housekeeping and hygiene in the high-risk high-care zones
Not applicable
8.6 Waste/Waste disposal in high risk, high care zones
Not applicable
8.7 Protective clothing in the high-risk high-care zones
Not applicable

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification

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9. Requirements for traded products

9.1 The food safety plan - HACCP

Not applicable

9.2 Approval and performance monitoring of manufacturers/packers of traded food products

Not applicable

9.3 Specifications

Not applicable

9.4 Product inspection and laboratory testing

Not applicable

9.5 Product legality

Not applicable

9.6 Traceability

Not applicable

Module 11: Meat Supply Chain Assurance

Scope

Click or tap here to enter text.

11.1 Traceability

Click or tap here to enter text.

11.2 Approval of meat supply chain

Click or tap here to enter text.

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11.3 Raw material receipt and inspection

Click or tap here to enter text.

11.4 Management of cross-contamination between species

Click or tap here to enter text.

11.5 Product testing

Click or tap here to enter text.

11.6 Training

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Module 13: Meeting FSMA Requirements for Food – July 2022

Preventive Controls for Human Food: 21 CFR Part 117 (Clauses 13.1.1 – 13.1.33)

Click or tap here to enter text.

Preventive Controls for Animal Food: 21 CFR Part 507 (Clause 13.2.1)

Click or tap here to enter text.

Food Defence: 21 Part 121 (Clauses 13.3.1 – 13.3.11)

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Sanitary Transportation: 21 CFR Part 1 Subpart O (Clauses 13.4.1 – 13.4.9)

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Produce Safety: 21 Part 112 (Clauses 13.5.1 – 13.5.18)

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14.1 Additional Specifier Requirements

14.1 Traceability

Click or tap here to enter text.

14.2 Environmental Monitoring

Click or tap here to enter text.

14.3 Product inspection and laboratory testing

Click or tap here to enter text.

14.4 Protective clothing: Employees or visitors to production areas

Click or tap here to enter text.

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