AMERICAN FOODS GROUP

500 S. Washington Street
Green Bay, WI 54301
Tel (920) 473-6330 Fax (920) 436-6466

January 1, 2023

Re: 2023 Beef Letter of Guarantee

Dear Valued Customer:

American Foods Group, LLC (AFG) facilities have been operating under a Pathogen Reduction/Hazard Analysis and Critical Control Point (HACCP) system while being federally inspected and verified by the United States Department of Agriculture (USDA) Food Safety Inspection Services (FSIS).

The following AFG harvest facilities have ante-mortem inspection conducted on all cattle intended for slaughter (9 CFR 309) and process only bovine species. The establishments covered by this letter include:

Est. 5511	**Gibbon Packing, LLC**	**Gibbon, NE**
Est. 410	**Green Bay Dressed Beef, LLC**	**Green Bay, WI**
Est. 2460	**Cimpls, LLC**	**Yankton, SD**
Est. 253	**Long Prairie Packing Co., LLC**	**Long Prairie, MN**

HACCP
Our establishments comply with FSIS HACCP (9 CFR 417) and SSOP requirements (9 CFR 416). Each HACCP plan is reassessed at a minimum annually and have ongoing verification and validation programs that comply with the USDA Interim Final Rule published in the Federal Register on January 12, 2004. Generic *E. coli* biotype I testing is also performed on carcasses per 9 CFR 310.25.

E. coli O157:H7 and Non-O157 STEC [O26, O45, O103, O111, O121 & O145] are considered a 'hazard reasonably likely to occur' in the establishment HACCP plans. Each HACCP plan contains at least one Critical Control Point (CCP) involving a pathogen intervention method specific to reducing *E. coli* O157:H7 below detectable levels.

Each facility operates a validated carcass thermal pasteurization system (either hot water or steam) with a designated CCP organic acid carcass cabinet. Additional validated antimicrobial methods in place include - organic acid sprays, steam vacuums, pre-evisceration antimicrobial treatments, carcass spray chill processing aid application, and cold chain management systems. Our facilities perform extensive microbial tests on carcasses which are statistically evaluated to serve as a process verification that our interventions are continually impacting microbial reduction.

Offal products intended for raw ground beef are treated with one or more processing aids which are demonstrated effective in reducing surface microbial contamination, which is considered as a CCP in their HACCP system. All CCP critical limits are monitored at a frequency to ensure process control.

An organic acid based antimicrobial agent is applied immediately prior to the packaging of subprimals. This agent is recognized by USDA-FSIS (Directive 7120.1) and CFIA as a "processing aid", therefore, there is no implication to labeling or including it in the ingredient statement. This treatment has been microbiologically validated in the facilities utilizing indicator microorganisms.

***E. COLI* O157:H7**

American Foods Group, LLC uses a robust sampling plan that utilizes N60+ and Manual Sampling Device [MSD] sampling on boneless beef trimmings, red offal (head, cheek meat, and hearts) and any other products destined for raw non-intact use.

100% of the sample is analyzed by an accredited third-party laboratory utilizing AOAC approved methodology using a multiplex PCR system for *E. coli* O157:H7. A negative Certificate of Analysis (COA) is then generated for all products destined for raw non-intact use. The absence of a COA is an indication that the product has either not been tested or the customer has not purchased tested products at the time of sale. If a COA is provided for *E. coli* O157:H7, then the samples listed in that report represent products that were produced from a system that controls both *E. coli* O157:H7 and Non-O157 STECs.

AFG facilities conduct ongoing verification of their *E. coli* O157:H7 sampling programs. The verification program is conducted at a minimum of once quarterly with an increased frequency during high prevalence months (April through September). This program is also used to meet industry best practice expectations that customers conduct on-going sample verification of their raw materials. AFG incorporates Non-O157 STECs within this program to provide additional data for review and verification of our intervention's effectiveness on these organisms.

NON-O157 STEC

AFG continues to evaluate our existing food safety systems, and incoming data along with published scientific research. Peer reviewed literature establishes that the existing *E. coli* O157:H7 pathogen intervention strategies are equally effective on Non-O157 STECs. We concluded that our existing pathogen reduction technologies and beef slaughter process controls for *E. coli* O157:H7 are effective in providing the same control to other Non-O157 STECs [O26, O45, O103, O111, O121 & O145] for beef trimmings and non-intact beef intended for raw use.

AFG will continue to collect and review necessary data from baseline research and testing methods for Non-O157 STECs and reassess accordingly.

HIGH EVENT PERIODS

AFG has a Hight Event Period (HEP) program when an abnormal number of presumptive positive *E. coli* O157:H7 results on trim have occurred in the same production day. If this occurs, the facility will hold and evaluate previously tested negative like-kind products. During this evaluation, a determination is made on whether or not products that previously tested negative may be associated with the presumptive positive product. If product is associated, that product is held and diverted to full lethality treatment or inedible use. Similar disposition of untested subprimal products may be taken if determined to be association with an Event.

PRODUCT INTENDED USE

Each AFG facility produces subprimal products packaged into vacuum bags and either boxed or placed into combos that are not tested and are intended solely for intact use. AFG expects any customers who purchase vacuum packaged primals in boxes or combos, and utilizes these products for non-intact processes, to address the specific usage within their HACCP plan.

AFG also produces tested trim, red offals (head, cheek, heart meat) and subprimal products that are not bagged and packaged 'naked' in lined boxes or combos. These products are robustly sampled utilizing N60 or equivalent methods and are intended for non-intact use, such as grinding, needle tenderizing or

injection.

NOTE: vacuum packaged beef subprimals in a combo or box are not intended for use in raw non-intact products.

Broker/Distributer/Purchasing Agent - The broker/distributor/purchasing agent has the responsibility to ensure their suppliers comply with these requirements.

FOOD SAFETY & QUALITY PROGRAMS

American Foods Group, LLC follows a strict food safety management process that supports our food safety system. Our harvest facilities have supporting prerequisite programs encompassing: Good Manufacturing Practices (GMPs), Foreign Material Control, Food Fraud Program, Pest Control Program, Product Hold Program, Food Defense Program, Allergen Control Program and a recall and traceability procedure; which provides for trace-back and trace-forward capabilities to ensure that the proper products and dates can be identified if necessary. All products are produced in an allergen free environment.

Third Party Audits - Our facilities have obtained certification under an approved Global Food Safety Initiative (GFSI) standard. In addition, each facility is evaluated annually by a 3rd party auditing firm using an E. coli Addendum, Animal Welfare (including transportation) by a PAACO Certified auditor and SRM audit.

Specified Risk Materials - AFG operations are in full compliance with Bovine Spongiform Encephalopathy [BSE] related regulations - 9 CFR 309, 310 and 318 et. al., Prohibition of the Use of Specified Risk Materials for Human Food and Requirements for the Disposition of Non-Ambulatory Disable Cattle.

Cattle processed at our facilities have not been subjected to air injection stunning (9 CFR 313.15(b)(2)(ii)). Our BSE control program also requires livestock producers to certify compliance with 21 CFR 589.2000 - Animal Proteins Prohibited in Ruminant Feed. All non-ambulatory disabled cattle are condemned and disposed of to rendering or landfill.

Drug Residue Testing - All AFG slaughter establishments operate with FSIS/USDA veterinarians that inspect and test suspect carcasses for chemical residues according to FSIS Directive 10,800.1 rev. 1 (03/03/2014). Each facility has implemented acknowledgement forms that producers sign to ensure understanding and compliance with the requirements for animals to be suitable for human consumption at the time of harvest.

Advanced Meat Recovery [AMR] - AFG utilizes mechanical meat/bone separation machinery to produce AMR. All product is produced in accordance with 9 CFR 301, 318 and 320. AFG utilizes atomic absorption spectroscopy to test product for non-complying specifications [Ca. >130.0 mg/100 g, Exc. Fe. 3.5 mg/100 g) and Ridascreen 10/5 kits for SRM testing.

Enclosed is an executed copy of our continuing guarantee to support our commitment to delivering safe and wholesome product.

American Foods Group, LLC appreciates your partnership and commitment to food safety. For additional information and/or updates please visit our website at https://www.americanfoodsgroup.com/fsqa-

documents/account/login or reach out to us directly at alarson@americanfoodsgroup.com or mhenriott@americanfoodsgroup.com.
Sincerely,

Ashley Lembke, PhD
VP Food Safety & QA
American Foods Group, LLC

CONTINUING GUARANTEE

American Foods Group, LLC ("Seller") guarantees that each and every article of food delivered to or for ("Buyer"), as of the delivery date: (a) is not adulterated or misbranded within the meaning of the Federal Food, Drug and Cosmetic Act (the "FDC Act"), the Federal Meat Inspection Act and the Poultry Products Inspection Act, in each case if applicable; (b) is not an article which, under the provisions of sections 404 or 405 of the FDC Act, if applicable, may not be introduced into interstate commerce; and (c) if the article contains a color additive, the color additive was from a batch certified in accordance with the FCD Act, if applicable. This guarantee does not apply to any article subjected to improper use, handling or storage after delivery or to use contrary to or inconsistent with Seller's instructions. Seller shall not be liable for any breach of this guarantee arising out of or resulting from Seller's compliance with Buyer's specifications, labeling instructions or other requirements.

EXCEPT FOR THE EXPRESS WARRANTIES SET FORTH ABOVE AND THOSE IN A WRITING SIGNED BY AN OFFICER OF SELLER AND BUYER, SELLER MAKES NO REPRESENTATION OR WARRANTY WHATSOEVER WITH RESPECT TO THE ARTICLES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE. IN NO EVENT SHALL SELLER BE LIABLE TO BUYER OR ANY THIRD PARTY FOR ANY LOST PROFITS OR REVENUES, DIMINUTION IN VALUE, OR ANY OTHER CONSEQUENTIAL, INDIRECT, INCIDENTAL OR SPECIAL DAMAGES.

This guarantee shall remain in effect until terminated by Seller on written notice to Buyer, provided, however, that termination shall not be effective as to any orders accepted by Seller prior to termination. This guarantee supersedes and replaces any prior guaranties given by Seller.

American Foods Group, LLC

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Ashley Lembke, PhD
VP Food Safety & QA
American Foods Group, LLC

Date: 01-01-2023