TRUE TERPENES

Third-Party Audited & Certified

ISO 9001:2015 **FSSC 22000**

COMPLIANCE PACKET

Q3 2020 | REV.03 07/01/2020

ABOUT US

The #1 Terpene Blend Manufacturer

Headquartered in Portland, OR, True Terpenes manufactures undiluted terpenes, flavor and functional ingredients and blends. Our organization is comprised of over 50 professionals, including flavor chemists, chemical engineers, QA/QC professionals, and safety inspectors, all trained in Good Manufacturing Practices (GMP), Food Safety and Food Defense.

World-Class Quality

Proud to be the only
ISO 9001:2015 - FSSC 22000
Third-Party Audited & Certified
Terpene Blend Manufacturer

OUR MISSION

We are committed to providing high-quality, safe products to customers like you throughout the world. Every day we seek to take an active leadership role in this emerging industry.

True Terpenes pressure neutral manufacturing clean room

YOUR EXTENDED TEAM

True Terpenes is built to support your individual needs. Our capabilities range from compliance documentation and audits, to innovative formulations that integrate with your product roadmap, and execution of orders with precision, velocity and rapid scalability. We are poised to support your company's dynamic growth.

TRUE EXPERTISE

FORMULATION + R&D

Intensively trained analytical and formulation chemists work in concert with our Science Advisory Board to push innovation and discovery initiatives.

QUALITY ASSURANCE

We deliver an elevated level of rigor to ensure that our products are trackable, clean, safe and compliant at the highest international standards.

MANUFACTURING

All the care of a hand crafted product with the fulfillment and production scalability to accommodate barrels of bulk material and thousands of finished goods.

SALES + SERVICE

Dedicated and knowledgeable sales and customer service teams find the right business solutions for you and provide timely customer service.

REGULATORY

Our staff monitors the ever-evolving regulatory environment across key domestic and international markets to help you avoid costly sourcing mistakes.

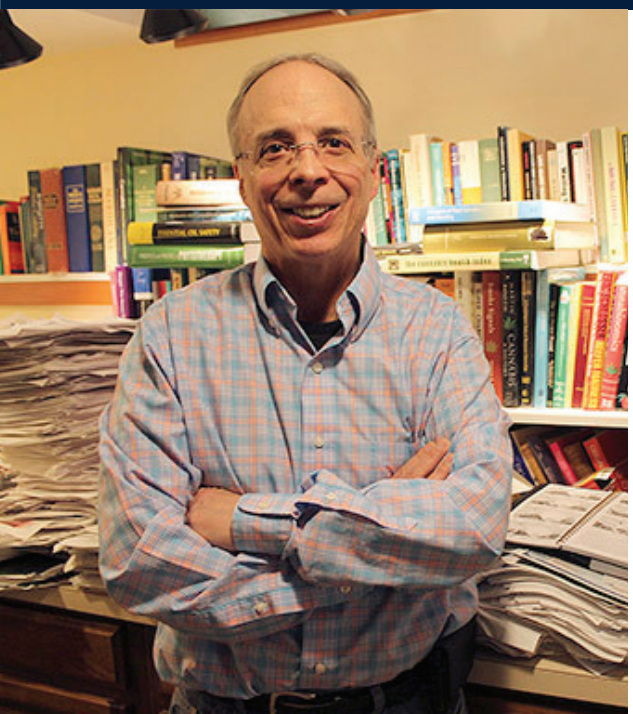
MARKETING

Our team supports clients with the training, education and tools needed to build channel understanding and sales velocity with terpene infused products.

WE MAKE FLAVORS WITH PURPOSE

The True Terpenes Scientific Advisory Board (SAB) and its members will unlock the functional benefits of terpenes and cannabinoids.

ETHAN RUSSO, MD IS PLEASED TO ANNOUNCE HIS ASSOCIATION WITH TRUE TERPENES AS A MEMBER OF THE SCIENTIFIC ADVISORY BOARD



"I have been investigating essential oils, their medical applications and their terpene and terpenoid components for 24 years, beginning at the same time as my formal involvement in cannabis and cannabinoid research. I was quickly aware of their potency and widely therapeutic properties and became fascinated with the potential of cannabinoid-terpenoid synergies, a concept that was enshrined in the scientific literature by Professors Mechoulam and Ben-Shabat in 1998 as "the entourage effect," the concept of multiple biochemical components working in concert.

I anticipate a long and fruitful relationship between CReDO Science, my new research and development company, and True Terpenes. I believe that together we can develop and produce numerous innovative products that will enhance human health and provide an admirable model for the industry."

Ethan Russo, MD | **To read more please visit TrueTerpenes.com/SAB**

GLOBAL QUALITY SYSTEMS

Third-Party Audited & Certified by Eagle Registration

ISO 9001:2015

The International Organization for Standardization (ISO) 9000 family of standards is the world's best-known quality management standard. By focusing on consistency, key targets and transparency, ISO standards provide a strong foundation for developing regulation worldwide. With consumer safety at the core of its purpose, company practices are audited to ensure safety, performance and fitness for end-users.

FSSC 22000

Good manufacturing practices (GMP) are the standards required to conform to the batch-to-batch quality and safety benchmarks recommended by agencies that oversee the manufacture and sale of consumer goods. The purpose of GMP is always to prevent harm from occurring to the end user. Ongoing and thorough audits ensure procedures are followed, a recall system is in place and the environment is clean and controlled.

The Foundation Food Safety System Certification (FSSC) 22000 uses international standards such as ISO 9001 to create a scheme for the auditing and certification of food safety management systems. Through meeting the Global Food Safety Initiative (GFSI) benchmarking requirements, the scheme demonstrates those who attain FSSC 22000 certification produce to the highest food industry standards in the world. FSSC 22000 includes GMP.

SCHEDULE A FORMAL AUDIT OR TOUR TODAY!

Please schedule a site visit and see the True Terpenes difference first-hand. Our Customer Service team is available to answer any questions that you may have. Contact us at email: info@trueterpenes.com.

Document Control

Secure Facilities

SDS, COA & SOPs

Training & QC

Product Trackability

Chain of Custody

Critical Control Points

Materials Handling

AUTOMATION

Clean, consistent and controlled. Our high throughput system delivers thousands of production units daily.

SCALABLE MANUFACTURING

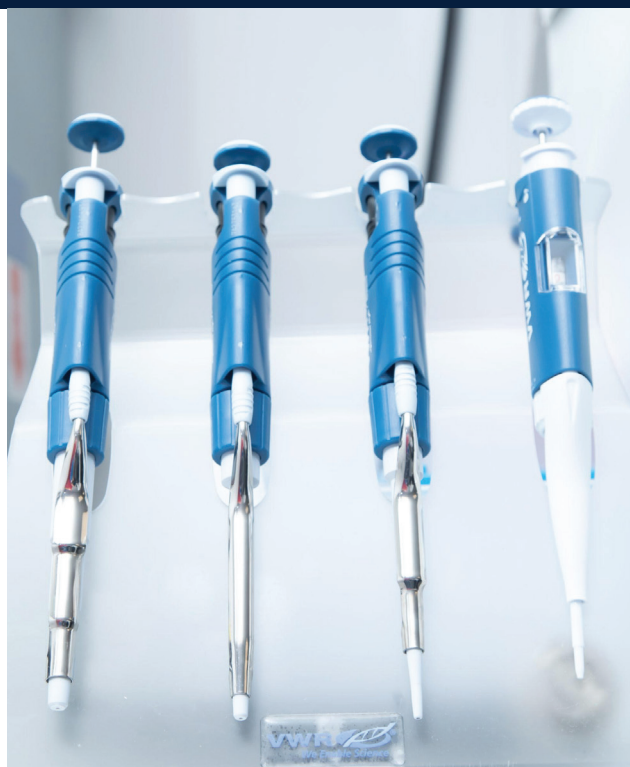
FILAMATIC

We've created a system that's meets our unique demands for small batch customs and high volume output.

ONE MOLECULE AT A TIME

True Terpenes' molecular-level attention to detail results in the most consistent, well-architected products in the industry. We nurture deep institutional knowledge on terpenes with a unique blend of people, infrastructure and R&D programming. The result is a diverse product portfolio optimized for flavor and functional differentiation across a broad set of form factors and applications.

When terpenes are mishandled or contaminated, they may lose their potency, aroma and flavor, diminishing their effects and disrupting consistency. This may also create product liability problems. True Terpenes is the best insurance policy to mitigate these risks and activate product differentiation in a competitive marketplace.



LEADERS IN FORMULATION

BEST IN CLASS

True Terpenes' analytical chemistry and product development teams work in positive pressure, pharma-grade clean rooms with state-of-the-art instrumentation and high speed production lines for scaling innovation.

ULTRA-DISTILLED

The True Terpenes process begins with the highest quality, food grade, botanical sources. Our products are analyzed for heavy metals, pesticides and residual solvents, and triaged based on stringent standards. Advanced distillation is used to ensure the purity of our terpenes, as needed.

OPTIMAL TERPENE PROFILES

The best terpene blends are inspired by nature, refined by science and enhanced by talented formulation chemists.

The True Terpenes formulation process begins with the most terpene-rich natural plant strains and varietals with maximum organoleptic impact. Our sensory and scientific evaluations advance the most promising individual flavor and aroma components in the plant kingdom. True Terpenes currently has 3400 custom flavor options and 200+ proprietary blends.

True Terpenes' state-of-the-art analytical laboratories inform our formulations processes with scientific capabilities. Our passion for natural botanicals is backed by the largest certified global sourcing program for terpenes in the country, and full analytical integration with our two certified formulations laboratories in Oregon and Texas.

At True Terpenes, we go beyond great-tasting blends. We are committed to the scientific research behind the flavors and aromas, and we are passionate about advancing functional actives across a variety of targets .

GC-MS

Analysis with liquid and headspace sample injection and terpene profiling.

OUR PRODUCTS

Our current product offerings include: Terpene Strain Profiles, Infused Terpene Strain Profiles, Terpene Flavor Profiles, Viscosity Extract Modifier and Terpene Isolates. Each of these products comes in a variety of sizes ranging from 2mL to a gallon. All products are formulated, blended, packed and labeled in cGMP facilities conforming to FSSC 22000 and ISO 9001:2015 quality standards.

All raw materials are tested in an ISO/IEC 17025 accredited laboratory following our Master Product Specifications. Certificate of Analysis (COA) and Safety Data Sheets (SDS) are available for each product that we sell at: trueterpenes.com. Other valuable documentation such as Certificates of Compliance (COC) and Natural Certificates are available upon request.

Terpene Isolates

Premium grade product with top shelf purity levels. True Terpenes isolates are perfect for boosting the aromas, flavors and effects of select isolates in formulation.

Terpene Strain Profiles

Our classic Strain Profiles use detailed plant analytics to recreate terpene combinations found in nature.

Infused Strain Profiles

The effects-rich properties of Strain Profiles coupled with bold complementary flavors and aromas.

Terpene Flavor Profiles

A fragrant departure from our strain-inspired profiles. Deliberate flavors with an aromatic terpene boost.

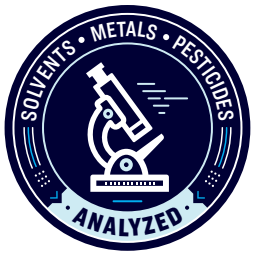
Viscosity Extract Modifier

The only extract modifier comprised of terpenes found natively in cannabis. Viscosity is flavor and aroma neutral.

TRUE GRADE QUALITY

This is our promise to you. Our isolated terpenes are triple-distilled making them the cleanest terpenes in the world. Fresh out of the bottle, undiluted, every single one of our products bests the most rigorous consumer safety standards. Below is a quick guide to the quality markers that we use to showcase True Grade™ standards across our products.

Manufactured in cGMP facilities using only food grade ingredients.



Tested and passed True Grade™ safety specifications for residual solvents, pesticides and heavy metals.

Products that have no PG, VG, PEG, MCT or Vitamin E Acetate added.

Finished goods are stored in a cool dry place away from UV light and are packaged in cobalt blue, UV deterrent and food grade bottles with tamper evident seal.

True Terpenes is proud to provide qualification documents such as certificates, licenses and registrations to be qualified as your supplier.

Blended in cGMP facilities adhering to the requirements for a Quality Management System (QMS) specified by ISO 9001:2015 and FSSC 22000 standards.

True Terpenes ships its botanical aromatic blends worldwide.

Formulated, blended, manufactured and fulfilled in the United States.

Rigorously tested with mid-grade distillate against separation, cloudiness and unacceptable levels of color change.

Table of Contents

Self-Audit Form Section 1: General Information

Company Name	Bulk Natural LLC. DBA True Terpenes
Products / Services	Design and Manufacturing of Terpenes, Flavor Ingredients, and Isolates
Headquarters Address	2416 N. Hayden Island Dr. Portland, OR 97217
Manufacturing Address	448 W Fork Dr. Arlington, TX 76012
Phone Number	(888) 954-8550
Email	info@trueterpenes.com
Is the company a division or subsidiary of another corporation?	● Yes ○ No
Number of Years in Business	< 4 years
Number of Personnel	~50 Employees
What is the square footage of the manufacturing facility?	10,000 sq ft.
Number of Personnel in Production	~10
How Many Shifts?	Single 8-hr shift
QA Contact	Name, Title: Alesya Bradley, Chief Compliance Officer
Number of Personnel in QA? In QC?	QA- 2; QC - 2;
Is the QA department independent of production?	● Yes ○ No

Self-Audit Form Section 3: Quality Systems

	Yes	*No*	*N/A*	*Comments*
Do you operate under a Quality Management System Manual (QMSM)?	●	○	○	A Table of Contents is attached.
Is there a company organizational chart?	●	○	○	Available upon request.
Is there a published quality policy stating the company's intentions to meet its obligations to produce safe and legal products, and its responsibilities to customers?	●	○	○	A copy is attached.
Is the policy communicated to all staff and understood?	●	○	○	
Are responsibilities clearly defined and appropriate arrangements in place to cover for absence of key staff?	●	○	○	
Are quality objectives established and maintained?	●	○	○	
Is there a system in place to keep the company informed of all relevant legislation?	●	○	○	
Do you have a customer complaint handling procedure?	●	○	○	
Is there an effective management review with agreed actions communicated to appropriate staff?	●	○	○	
Is there a documented internal quality audit program?	●	○	○	
Are there internal audits carried out at a frequency determined by risk?	●	○	○	
Are there documented operating procedures?	●	○	○	
Is there a document and change control system in place?	●	○	○	
Are documents maintained for a minimum of 3 years?	●	○	○	
Is there a documented system of calibration of measuring equipment, including corrective actions for out of specification equipment?	●	○	○	
Is there a documented supplier control program in place with written SOPs (Standard Operating Procedure)?	●	○	○	
Is there a documented supplier approval process based on risk assessment that covers all ingredients and packaging materials?	●	○	○	
Do you audit your suppliers?	●	○	○	Annually

Self-Audit Form Section 3: Quality Systems (cont.)

	Yes	*No*	*N/A*	*Comments*
Are incoming materials staged and properly identified with status (ie. acceptable, hold, rejected, etc.)?	●	○	○	Incoming Raw Materials are placed on "HOLD" and kept separate from "RELEASED" Raw Materials and Finished Goods.
Are incoming inspection processes documented? What sampling plan is used for incoming inspection?	●	○	○	Every delivery and all materials are inspected and the inspections are documented in Receiving records.
Are incoming raw materials inspected and tested against agreed specifications?	●	○	○	Every bulk lot is inspected and safety tested according to our Master Product Specifications (Attached). We do not accept ANY incoming raw materials if they do not meet these specifications.
Are raw materials positively released?	●	○	○	
Can traceability, that includes rework, be demonstrated back to suppliers and forward to customers?	●	○	○	
Are there 'In process' quality control procedures and records maintained?	●	○	○	Quality Control Records maintained for 5 years.
Are there operating procedures to control non-conforming material (Out of Specification) and ensure CAPA (Corrective Action Preventive Action) are recorded and assigned?	●	○	○	
Is a quarantine area in place for non-conforming material?	●	○	○	Quarantine area locked up and properly segregated.
Are there documented finished product specifications?	●	○	○	

Self-Audit Form Section 3: Quality Systems (cont.)

	Yes	*No*	*N/A*	*Comments*
Are finished products positively released?	●	○	○	
Is an inventory management turnover method being used, such as FIFO (First In First Out)?	●	○	○	FIFO is used.
Are finished products tested and approved before release?	●	○	○	
Do you have a dedicated area for retained samples?	●	○	○	Retained samples are kept in a temperature-controlled environment and are retained for up to 1 year.
Does the company operate a formal system of training, including new hire training with records maintained and reviewed periodically?	●	○	○	Job-specific, GMP, Food Safety / Food Defense Training for all new hires. Training refreshee annually.
Is there a documented recall plan in place?	●	○	○	
Is this challenged on a regular basis (ie. mock recall?)	●	○	○	Mock Recalls are performed twice a year (every 6 months).
Is there a procedure for notifying customers in the event of a recall?	●	○	○	
Is there a change control SOP in place?	●	○	○	
Is the customer notified of any changes in the finished product specifications or relevant process controls?	●	○	○	

Self-Audit Form Section 4: Facilities and Equipment

	Yes	*No*	*N/A*	*Comments*
Are site boundaries clearly defined?	●	○	○	
Is the condition of the buildings and surroundings basically sound?	●	○	○	
Is the site secure with access to production and storage areas restricted to authorized personnel?	●	○	○	
Are the equipment/utilities clearly identified?	●	○	○	
Is the process flow designed to minimize the risk of cross-contact and cross-contamination?	●	○	○	
Are walls, floors, and ceilings designed, constructed, finished, and maintained to prevent accumulation of dirt and facilitate cleaning?	●	○	○	Facility is maintained to GMP Standards.
Is adequate ventilation/extraction provided to prevent condensation or excessive dust?	●	○	○	
Is all water used in production or cleaning free from risks of contamination?	●	○	○	Water is not used in production, only in cleaning of the facilities and glassware.
Is the water supply treated (internally or at the source)?	●	○	○	
Is the quality of water, steam, ice, air, compressed air, or gas regularly monitored?	●	○	○	
Is the accumulation of waste prevented?	●	○	○	
Are waste containers covered and at least 5 meters from an entrance?	●	○	○	
Is all equipment constructed from food grade material?	●	○	○	
Is there a planned preventative maintenance program in place?	●	○	○	
Is all equipment validated?	●	○	○	
Do the records indicate that the measuring/testing equipment is regularly calibrated? Is the calibration recall system acceptable and N.I.S.T. traceable?	●	○	○	

Self-Audit Form Section 5: Food Safety / HACCP

	Yes	*No*	*N/A*	*Comments*
Is there a Food Safety Plan(FSP)/HACCP (Hazard Analysis Critical Control Points) plan written and maintained by a certified PCQI (Preventive Control Qualified Individual)?	●	○	○	FSP, Flow chart, and Food Safety Statement attached.
Is the FSP/HACCP updated at least annually?	●	○	○	
Does the facility comply with the Food Safety Modernization Act (FSMA)?	●	○	○	
Do you have a safety team that regularly updates a Hazard Analysis that identifies all hazards associated with your facility?	●	○	○	
Are all the hazards that have been identified in your hazard analysis controlled by your facility?	●	○	○	
Is there a multidisciplinary Food Safety Team that meets on a regular basis?	●	○	○	Food Safety Meetings documented monthly.
Are Food Safety/HACCP meetings documented and records maintained?	●	○	○	
Are key personnel trained in Food Safety and Food Defense?	●	○	○	All personnel trained in FDA 101 and supervisors/ managers trained in FDA ALERT training.

FOOD-GRADE INGREDIENTS

All formulation compounds are food-grade and handled with care in clean, hygienic environment. Your high quality oils stay cleaner and more potent with True Terpenes Profiles and Flavors.

Self-Audit Form Section 6: Sanitation and Hygiene

	Yes	*No*	*N/A*	*Comments*
Is there a documented sanitation control program in place with written SOPs?	●	○	○	
Are documented cleaning schedules in place and records maintained?	●	○	○	
Is cleaning/sanitation outsourced?	●	○	○	Cleaning of the facilities is performed two times per week during non-production hours.
Is the effectiveness of cleaning schedules verified and audited?	●	○	○	
Does the facility utilize hygienic zoning?	●	○	○	
Are chemicals segregated from other ingredients, correctly labelled, and stored?	●	○	○	Chemicals stored away from Raw Materials and Finished Goods.
Are hygiene rules agreed and communicated with all staff?	●	○	○	Documented Hygiene Policy Attached.
Is smoking permitted in designated areas only?	●	○	○	Smoking is not allowed on the premises.
Is eating and drinking permitted in designated areas only?	●	○	○	Eating and Drinking only allowed in break rooms.
Are personnel, including visitors, with contagious diseases/boils/septic cuts/sores excluded from production areas?	●	○	○	Sick workers are not allowed into production.
Are coverings to minor injuries brightly colored and/or metal detectable?	●	○	○	Brightly Colored
Are all production personnel required to wear hair/beard nets for product protection?	●	○	○	
Is all external clothing (ie. overalls, lab coats, etc.) laundered externally?	●	○	○	
Is there a policy restricting the wearing of jewelry, fake eyelashes, fingernails, etc.?	●	○	○	

Self-Audit Form Section 6: Sanitation and Hygiene (cont.)

	Yes	*No*	*N/A*	*Comments*
Are there adequate handwashing facilities provided?	●	○	○	
Are handwashing signs visible and legible?	●	○	○	
Are there adequate changing and toilet facilities separated from food processing and handling areas?	●	○	○	
Are personal items and lockers outside of the production area?	●	○	○	
Is hand cleaner bacteriostatic, unperfumed, and liquid?	●	○	○	
Is hand drying by hot air and/or paper towel?	●	○	○	
Are waste containers available and lidded?	●	○	○	

Self-Audit Form Section 7: Pest Control

	Yes	*No*	*N/A*	*Comments*
Is pest control carried out by a third-party contractor?	●	○	○	
Is the service contract defined?	●	○	○	
Is pest control carried out by trained personnel?	●	○	○	
Is there a site map indicating the position of all pest control measures?	●	○	○	
Are records maintained and actions undertaken and signed off as required?	●	○	○	
Are there adequate electric fly killers and moth traps in use?	●	○	○	
Are windows and doors to production areas adequately screened to prevent ingress of pests?	●	○	○	
Are goods stored in such a way as to allow inspection and minimize the risk of infestation?	●	○	○	

Self-Audit Form Section 8: Cross Contamination

	Yes	*No*	*N/A*	*Comments*
Do you use screens, magnets, or filters in your process?	●	○	○	Filters on occasion.
Is all glass and brittle plastic identified and a register maintained?	●	○	○	
Is there a written procedure for glass/hard plastic breakages and are all breakages recorded?	●	○	○	
Are all bulbs and strip lights, including those on electric fly killing units, protected from shattering?	●	○	○	
Has the use of wood been eliminated from production areas?	●	○	○	
Are raw materials and finished products stored in clean, dry, and well-ventilated spaces, protected from dust, cross-contact, and sources of contamination?	●	○	○	
Is there a documented allergen control program in place with written SOPs?	●	○	○	Allergen Statement Attached.

Self-Audit Form Section 9: Packaging and Supply

	Yes	*No*	*N/A*	*Comments*
Are there procedures to ensure that the products are adequately protected after manufacture and during transit to our facility?	●	○	○	
Does all packaging comply with relevant food safety legislation?	●	○	○	
Is packaging stored away from raw materials and finished product?	●	○	○	
Is the product supplied on protective layer pallets?	●	○	○	
Is traceability of packaging ensured?	●	○	○	
Is the packaging tamper evident?	●	○	○	

TERPOLOGY 101

Limonene extracted from a lemon is chemically identical to Limonene found in Cannabis.

Self-Audit Form Section 10: Laboratories and Testing

	Yes	*No*	*N/A*	*Comments*
Do you have an internal laboratory?	●	○	○	
Is an outside laboratory used for any testing?	●	○	○	
Are outside laboratories certified (ie. ISO 17025)?	●	○	○	
In case of calculation, is the calculation checked by another person? (In case of the use of software validation, the calculation sheet must be validated)	●	○	○	
Is skip lot testing done on any tests listed on the product specification?	○	●	○	Every lot is tested.

Self-Audit Form Section 11: Item/Material Specifications (If Applicable)

**Product Specification sheets for the items / materials below are available upon request.

Item / Material	Terpenes and Terpene Blends
Lot Code Example	TYYMMRRR e.g. T200615
Lot Code Interpretation	T = Terpenes 20 = Last Digit of Year Manufacture 06 = Month of Manufacture 15 = Random Number

The following documentation is provided on the website: Bulk Lot COA and SDS

The following documentation is provided by QA upon request: Product Specifications, Bottle Lot COA (or written traceability to Bulk Lot), Certificate of Compliance, Natural and other applicable product certificates.

ONLINE

See More of OUR PROCESS

▸ TrueTerpenes.com/our-process/

TRUE TERPENES

a true™ company

▾ FINISHED GOODS

100+ fresh profiles ready to ship daily.

EAGLE Registrations Inc.
SERVICE • INTEGRITY • VALUE

ANAB ACCREDITED ISO/IEC 17021 MANAGEMENT SYSTEMS CERTIFICATION BODY

MEMBER OF MULTILATERAL RECOGNITION ARRANGEMENT IAF

Certificate No. 5959 (Reissued – December 4, 2019 - 2 Copies)
September 6, 2019 through September 6, 2022

Certificate of Registration

This is to certify that the Quality Management System of

Bulk Natural LLC, DBA True Terpenes

2416 North Hayden Island Drive, Portland, Oregon 97217, USA

Additional Addresses:
4080 SE International Way, Portland, Oregon, 97222, USA
Activities: (R & D / Product Design)

Has been assessed by **EAGLE Registrations Inc.** and conforms to the following standard:

ISO 9001:2015

Scope of Registration

Design and manufacturing of terpenes, flavor ingredients and isolates.

Director of Certification

EAGLE Food Registrations Inc.
SERVICE • INTEGRITY • VALUE

ANAB ACCREDITED ISO/IEC 17021 MANAGEMENT SYSTEMS CERTIFICATION BODY

Certificate of Registration

The Food Safety Management System of:

Bulk Natural LLC, DBA True Terpenes

at

2416 North Hayden Island Drive, Portland, Oregon 97217, USA
4080 SE International Way, Portland, Oregon, 97222, USA

has been assessed and determined to comply with
the requirements of

Food Safety System Certification (FSSC) 22000
(Version 4.1)

Certification scheme for food safety management systems consisting of the following elements:
ISO 22000:2005, ISO/TS 22002-1:2009 and additional FSSC 22000 requirements version 4.1.

This certificate is applicable for the scope of:

Manufacturing of terpenes, flavor ingredients and isolates for the food industry.

Food Chain Category: K - Production of (Bio) Chemicals

Certificate of Registration No: 5958

Date of Certification Decision: December 4, 2019

Initial Certification Date: September 6, 2019
Issue Date: December 4, 2019
Valid Until: September 6, 2022

FSSC 22000

Authorized By: Kelly Abbott

Director of Certification

Validity of this certificate can be verified in the FSSC 22000 database of certified organizations available on www.fssc22000.com.

Issued by:
EAGLE Food Registrations Inc. | 40 N. Main Street, Suite 1880 | Dayton, OH 45423 | USA
937.293.2000 or 800.795.3641 | www.eaglecertificationgroup.com

V2 - 11/14/2019

Quality Management System Manual (QMSM) Table of Contents

Quality Statement What We Stand For

True Terpenes' mission is to produce and deliver safe and secure products to our customers throughout the world. Further, we promise to provide leadership, education and advocacy in ensuring that policy and practices are in place for products' purity, precision and transparency.

Our commitment is to never compromise on the safety, compliance or quality of our products and services. In order to reach this goal True Terpenes empowers employees with education and the tools to ensure the safety of our staff, neighbors, families, customers and brands.

True Terpenes sets the industry standard by consistently discovering and developing best practice policies along with a system of checks and balances to ensure that all terpenes are high quality.

We are committed to the continual improvement of our quality management system and compliance with all applicable regulatory requirements.

We inspire and facilitate the creation of high-quality products that promote happy and healthy living. We are committed to providing great service and respect to our customers, community and environment.

Flavor is Our Passion, Quality is Our Promise

Food Safety Plan

1. Food Safety Statement - Attached
2. Hygienic Zone Procedure - FSPL002
3. Food Safety Recall & Withdrawal - FSPP002
4. Traceability of Food Grade Products - FSPP003
5. QC Testing of Incoming Food Grade Raw Material - FSPP007
6. Clean Room Process Flow - FSPP008
7. Food Defense & Food Fraud - FSPP009
8. Food Grade Raw Material Review Procedure - FSPP010
9. Food Grade Manufacturing Process - FSPP011

1. Food Safety Statement

1.1 Food Safety Mission

Bulk Natural LLC, DBA True Terpenes is committed to providing Safe and Secure products to its customers throughout the USA and the world and will take a leadership role in ensuring that policies and practices are in place.

We are a wholesale distribution company based out of Portland, OR that focuses on helping small businesses grow and expand their product lines. We work with the approved suppliers around the country to get the safest and highest quality extracts possible.

1.2 Policy Statement

Bulk Natural LLC DBA True Terpenes' top management recognizes the importance of food safety throughout the food supply chain particularly at all stages where True Terpenes performs food sourcing, storage, handling, processing, packaging, and distribution. Everyone within the organization has the collective responsibility of food safety and has a moral obligation to safeguard each other, our customers and the consumers. A positive food safety culture has been nurtured within the organization. True Terpenes is committed to taking all responsible steps and precautions and exercising our due diligence to protect and preserve the human food chain in our custody.

To ensure best practice, True Terpenes operates under current Good Manufacturing Practices (cGMP) and has established the internationally recognized Hazard Analysis Critical Control Point (HACCP) system and follows ISO 9001:2015 and FSSC 22000 Food Safety standards.

To achieve our goal, we:

- Apply the sound food technology, science, industry best practice into our context
- Perform regular identification of hazards, determination of critical control points and timely implementation of effective control and monitoring measures
- Conform with the regulatory requirements and the agreed customer requirements
- Define the food safety objectives and continually review to ensure consistent compliance
- Communicate, implement and maintain this policy at all levels of the company
- Employ competent staff, reliable contractors and source from reputable suppliers
- Provide our personnel with adequate food safety information, training, instructions, tools and equipment to carry out their job in a hygienic and professional manner
- Promote personal hygiene and cleanliness to our staff, contractors, suppliers and visitors
- Develop and strive to continually improve our processes capable of delivery of safe food products through an efficient, effective and suitable food safety management system

1. Food Safety Statement (cont.)

1.3 Specific Policies

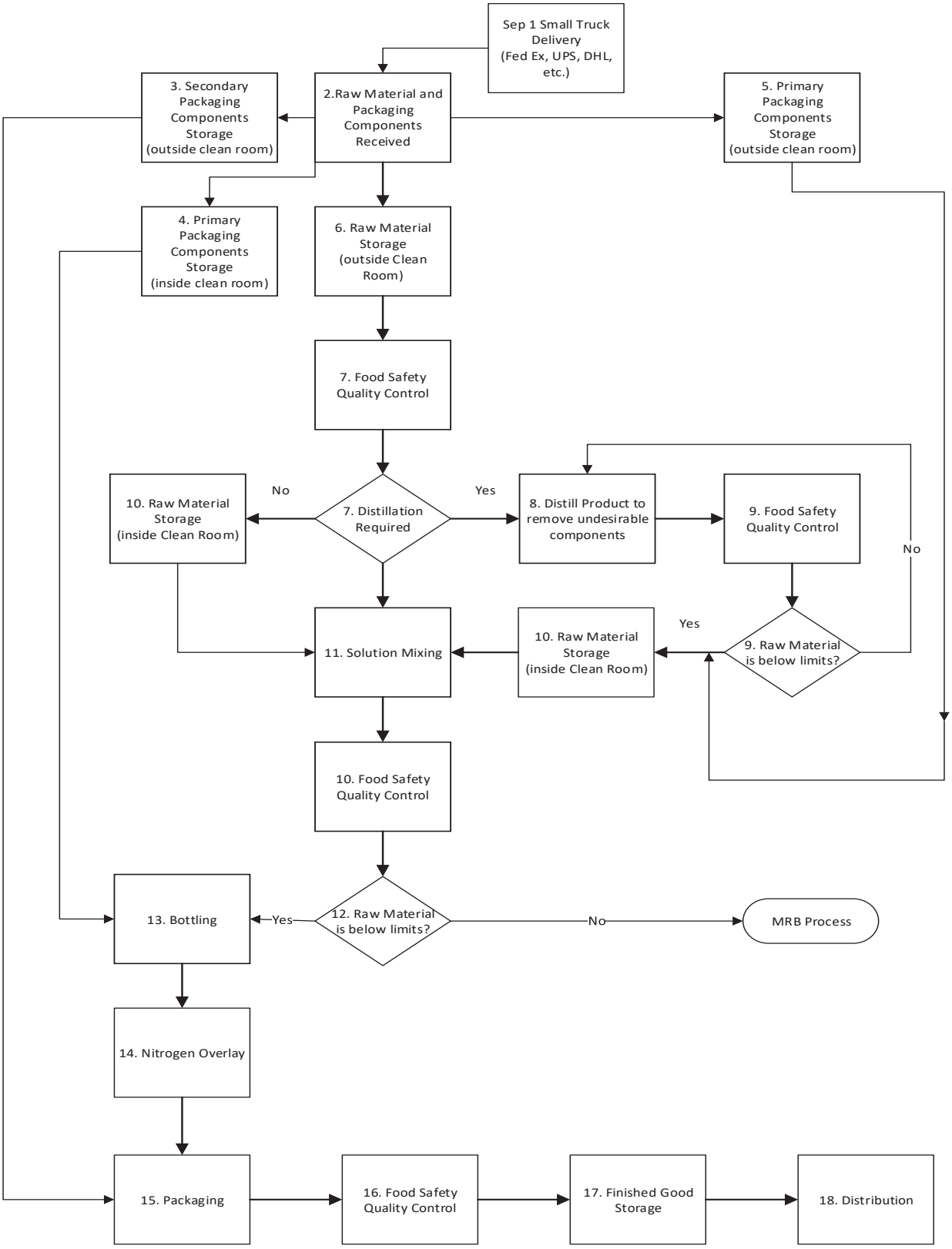
- Supplier Qualification: All suppliers, vendors, and laboratories must be qualified and approved in order to ensure all materials are purchased from safe, secure, and reliable sources.
- Safety Testing: All new lots of terpene isolates are tested for residual solvents, pesticides and heavy metals prior to packing and blending. Any isolate which does not meet our product specifications is quarantined and is not used in packing and blending.
- Worker Hygiene and Sanitation Procedures: Every person who is hired to work in production must have documented training in Current Good Manufacturing Practices (cGMP). This includes procedures such as proper hygiene and hand washing, using Proper Protective Equipment (PPE), not allowing ill workers to be in production areas, and general housekeeping.
- Product Traceability: Bulk Natural LLC, DBA True Terpenes is able to trace back to the plant any lot of the product that has been distributed or sold.

The ultimate goal of these standards, and the procedures that support them, is to guarantee the delivery of safe and reliable products to our customers.

To ensure that we practice what we preach, our plant is audited by an independent third party. The third party has no stake in the outcome of the audits. The auditor's mandate is to assess the compliance of our plant with the standards we have set. Through the use of third party audits, we are able to increase the consumer's level of confidence in the safety of our products and maintain our integrity.

Implementation is always the key to success. Our Quality and Regulatory department keeps detailed records of all policies, procedures, and methods.

Food Grade Manufacturing Flow



Hygiene Policy

1. General Personal Safety and Hygiene

a. Mouth Pipetting is strictly prohibited. Pipetting aids are available, therefore mouth pipetting of any material regardless of safety hazard is not allowed, at anytime.

b. Smoking is prohibited anywhere on the premises.

c. No food is permitted in production areas, including but not limited to food, drinks, chewing gum/tobacco, candy, lozenges and cigarettes. Medication may be stored in personal lockers, but is prohibited in production and warehouse areas.

d. Personnel shall refrain from sneezing or coughing over materials or products. Spitting (expectorating) is prohibited.

e. Uniforms and Protective Clothing: All plant personnel and technicians are to wear a lab coat or jacket over street clothes when in the production area. Bulk Natural provides the lab coats. Lab coats must be removed when entering the lunch area. Lab coats contaminated by chemicals must be removed and placed for washing. Other protective clothing such as gowns, gloves, masks, goggles, hair and beard nets and aprons are provided when needed. Plant goggles or glasses are to be worn AT ALL TIMES when working in the production areas.

f. Other Clothing and Grooming: Shoes that are worn in the lab should be comfortable and cover the entire foot (lace or loafer style). It is strongly recommended that shoes with open toes and/or heels not be worn when working in technical areas. Long Hair shall be secured back and off the shoulders. Loose Jewelry such as bracelets or long necklaces shall not be worn in production. Medical imperatives are allowed with permission. The application of cosmetics or other personal grooming is prohibited in technical work areas. Fingernails are to be kept clean and trimmed. Use of nail polish, false nails and false eyelashes are prohibited in production areas. Carrying writing implements behind the ears is prohibited.

g. Personal lockers: Employees are given lockers in the lunchroom to store any personal items. Storage of product contact tools or equipment in personal lockers is prohibited. Lockers and storage areas will be inspected randomly or if there is any knowledge of suspicious activity. Lockers and storage areas will be cleaned regularly and will be kept free from rubbish or soiled clothing. Personal items such as coats, jackets, bags, etc. are not allowed to be carried into the plant and must remain in the break area or in lockers. Medication may be stored in personal lockers, but is prohibited in the production areas. No personal items are to remain in personal lockers during non-working hours.

h. The following is Performed in the Production Area only:

    i. Ensure that when gloves are worn, the gloves cover the end sleeve of the lab coat so that no skin is visible,

    ii. Ensure lab coats do not come in contact with product containers,

    iii. Perform pre-operational check at the beginning of each work day.

    iv. Clean working stations before and after task completion,

    v. If a spill occurs on the working stations, report the spill to management and clean up immediately.

Hygiene Policy (cont.)

i. Hand Washing

   i. Proper hand washing steps are:

   ii. Rinse hands; Apply soap;Scrub and lather soap for 25-30 seconds; Rinse hands thoroughly; and Dry with a paper towel. Apply hand sanitizer following hand washing. Using hand sanitizer DOES NOT replace proper hand washing.

   iii. Hands must be washed:

      1. At the start of each shift (at start-up, after lunch and breaks);
      2. After using the bathroom or smoking;
      3. After blowing nose, coughing, sneezing, etc.;
      4. After picking up items from the floor;
      5. Any time your hands become contaminated (touch dirty surfaces, garbage bins, etc.); and
      6. When entering the production area from a less-clean area (e.g. outside or warehouse).

j. Illness: If an employee has experienced symptoms of an infectious disease (ie. diarrhea, vomiting, sores/wounds, sore throat, fever, etc.) within the last 24 hours, the employee shall report illness to management and shall be prohibited to work and sent home by his/her supervisor to protect the other employees and the safety of the food. Personnel with wounds or burns shall be required to cover them with brightly colored or metal detectable dressings if in the production area. Any lost dressing shall be reported to management immediately.

HANDS OFF We deploy manufacturing methods that help limit touch points and potential for contamination.

Allergen/Sensitive Agents Identification Sheet Terpene Isolates and Blends

* A solid mark (●) indicates the Allergen/Sensitive Agent is present. If blank (○), it means that to the best of our knowledge, there are no Allergen / Sensitive agents present.

Allergen / Sensitive Agent	*Source of Allergen in the Product**	*Present in Product**	*Present on the Same Line**	*Present in the Facility**
CORN & CORN PRODUCTS (Includes modified starch, hydrolyzed protein, sweeteners, sugars, spice carriers)	○	○	○	○
EGG & EGG PRODUCTS (liquids and powders)	○	○	○	○
FISH (Includes any and all species of fresh and saltwater fish)	○	○	○	○
GARLIC (Dehydrated, powdered, granules, and flakes)	○	○	○	○
GLUTEN (Wheat, rye, barley, oats, flour, etc.)	○	○	○	○
MILK & DAIRY PRODUCTS (Includes whey, lactose, cheese, casein, spice carriers, milk, cream, etc.)	○	○	○	○
MONOSODIUM GLUTAMATE	○	○	○	○
PEANUTS, PEANUT OIL & PEANUT DERIVED ITEMS (Peanut meal, flour & ground nuts, szechuan sauce, mandelona nuts, etc.)	○	○	○	○
SESAME SEEDS & SESAME OIL	○	○	○	○
CRUSTACEANS (Shrimp, lobster, rock lobster, crab, crayfish, and products made from them)	○	○	○	○
MOLLUSKS (Clams, mussels, oysters, scallops, and products made from them)	○	○	○	○
SOY (Includes soya powder, protein, oil, lecithin, tofu)	○	○	○	○
SULFITES (Includes sulfur dioxide, sodium dithionite, chemicals that lists sulfite, etc.)	○	○	○	○
TREE NUTS (Includes almonds, beechnuts, brazll nuts, nutmeg, cashews, chestnuts, coconut, etc.)	○	○	○	○
WHEAT (Includes hydrolyzed wheat protein, flour, gluten flour, starches)	○	○	○	○
MUSTARD & MUSTARD OIL	○	○	○	○
LUPIN	○	○	○	○
CELERY	○	○	○	○

There are currently no allergens on-site or in the products, however there is an allergen control program in place if potential allergenic material were to be introduced.

Master Product Specifications

Residual Solvent	*Reporting Limits (ppm)* [1]
Category I Residual Solvent or Processing Chemical	
1,2-Dichloroethane	1.0 (ND)
Benzene	1.0
Chloroform	1.0 (ND)
Ethylene Oxide	1.0 (ND)
Methylene Chloride	1.0 (ND)
Trichloroethylene	1.0 (ND)
Category II Residual Solvent or Processing Chemical	
1,4-Dioxane	380 (ND)
1-Butanol	5000 (ND)
1-Pentanol	5000 (ND)
1-Propanol	5000 (ND)
2-Butanol	5000 (ND)
2-Butanone	5000 (ND)
2-Ethoxyethanol	160 (ND)
2-Methylbutane	750
2-Methylpropane (Isobutane)	800
2-Propanol (IPA)	500
Acetone	750
Acetonitrile	60 (ND)
Butane	500
Cyclohexane	3880 (ND)
Cumene (Isopropyl Benzene)	70
2,2-dimethylbutane	50
2,3-dimethylbutane	50
O-Xylene	150
M-Xylene & P-Xylene	150

Master Product Specifications (cont.)

Residual Solvent	*Reporting Limits (ppm)* [1]
Dimethyl Sulfoxide (DMSO)	5000 (ND)
Ethanol	1000
Ethyl Acetate	400 (ND)
Ethylbenzene	150 (ND)
Ethyl Ether	500 (ND)
Ethyl Glycol	620 (ND)
Heptane	500
n-Hexane	50
Isopropyl Acetate	60 (ND)
Methanol	250
Methylpropane	200
2-Methylpentane	50
3-Methylpentane	50
Naphtha	400 (ND)
N,N-Dimethylacetamide	880 (ND)
N,N-Dimethylformamide	880 (ND)
Pentane	750
Petroleum Ether	400 (ND)
Propane	500
Pyridine	200 (ND)
Sulfolane	160 (ND)
Tetrahydrofuran	720 (ND)
Toluene	150
Xylenes	150
Total Residual Solvents	5000

Product Specifications (cont.)

Pesticide	*Reporting Limits (ppm)* [1]
Category I Residual Pesticide	
Aldicarb	0.4 (ND)
Carbofuran	0.2 (ND)
Chlordane	ND
Chlorfenapyr	0.2 (ND)
Chlorpyrifos	0.2 (ND)
Coumaphos	0.1 (ND)
Daminozide	0.05 (ND)
DDVP (Dichlorvos)	0.1 (ND)
Dimethoate	0.2 (ND)
Ethoprophos	0.2 (ND)
Etofenprox	0.4 (ND)
Fenoxycarb	0.2 (ND)
Fipronil	0.4 (ND)
Imazalil	0.04 (ND)
Methiocarb	0.2 (ND)
Methyl-Parathion	0.2 (ND)
Mevinphos	0.1 (ND)
Paclobutrazol	0.05 (ND)
Propoxur	0.2 (ND)
Spiroxamine	0.4 (ND)
Thiacloprid	0.2 (ND)
Category II Residual Pesticide (Inhalables)	
Abamectin	0.07
Acephate	0.1

Product Specifications (cont.)

Pesticide	*Reporting Limits (ppm)* [1]
Acequinocyl	0.1
Acetamiprid	0.1
Azoxystrobin	0.02
Bifenazate	0.02
Bifenthrin	0.1
Boscalid	0.1
Captan	0.7
Carbaryl	0.2
Chlorantraniliprole	0.2
Clofentezine	0.1
Cyfluthrin	1
Cypermethrin	1
Diazinon	0.1
Dimethomorph	2
Etoxazole	0.1
Fenhexamid	0.1
Fenpyroximate	0.1
Flonicamid	0.1
Fludioxonil	0.1
Hexythiazox	0.1
Imidacloprid	0.02
Kresoxim-methyl	0.1
Malathion	0.2
Metalaxyl	0.2
Methomyl	0.4

Product Specifications (cont.)

Pesticide	*Reporting Limits (ppm)* [1]
Myclobutanil	0.04
MGK-264	0.2
Naled	0.1
Oxamyl	0.5
Pentachloronitrobenzene	0.1
Permethrins	0.04
Phosmet	0.1
Piperonyl Butoxide	2
Prallethrin	0.1
Propiconazole	0.1
Pyrethrins	0.5
Pyridaben	0.1
Spinetoram	0.1
Spinosad	0.06
Spiromesifen	0.03
Spirotetramat	0.02
Tebucanazole	0.01
Thiamethoxam	0.2
Trifloxystrobin	0.1

Heavy Metals	*Limits ppm* [1]
Arsenic	0.2
Cadmium	0.2
Lead	0.5
Mercury	0.1

ND - Not detected.

Product Specifications (cont.)

Comments

1. The lowest allowed limits in the United States of America.

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Signature: A Brad Date: 05/05/2020

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(print job title and first and last name)
Signature: Karen Bodewes Date: 5-5-2020

Document Approved: QA Director Marji Hutchinson
(print job title and first and last name)
Signature: Marji Hutchinson Date: 5-5-2020

Frequently Asked Questions

Question 1: What is True Grade?

We are cGMP, ISO 9001:2015 and FSSC 22000 certified. We follow the strictest limits across 50 states when analyzing each raw material and each finished product lot for safety (Residual Solvents, Pesticides and Heavy Metals.)

Question 2: What is cGMP?

Current Good Manufacturing Practice (GMP) is a system for ensuring that products are consistently produced and controlled according to quality standards. It is designed to minimize the risks involved in any pharmaceutical production that cannot be eliminated through testing the final product.

Question 3: What is ISO 9001:2015?

ISO 9001:2015 (International Standard Organization) specifies requirements for a quality management system when an organization:

a. needs to demonstrate its ability to consistently provide products and services that meet customer and applicable statutory and regulatory requirements, and

b. aims to enhance customer satisfaction through the effective application of the system, including processes for improvement of the system and the assurance of conformity to customer and applicable statutory and regulatory requirements.

All the requirements of ISO 9001:2015 are generic and are intended to be applicable to any organization, regardless of its type or size, or the products and services it provides.

Question 4: What is FSSC 22000?

FSSC 22000 (Food Safety System Certification) is a company-level certification based on a scheme developed by the Foundation for Food Safety Certification. The standard helps organizations ensure the supply of safe food and beverages. In addition to the requirements set forth in this certification, FSSC 22000 fully incorporates ISO 22000 and prerequisite programs. This certification is intended for agricultural and food and beverage businesses that manufacture or process food products, ingredients, and packaging materials. Certifications are issued by a licensed third party certifying bodies. To maintain FSSC 22000, companies will be subjected to annual or regularly scheduled audits to evaluate the organization's continued compliance to the standard.

Question 5: What is HACCP?

HACCP stands for Hazard Analysis and Critical Control Points. This is a preventative food safety system in which every step in the manufacture, storage and distribution of a food product is scientifically analyzed for microbiological, physical and chemical hazards.

Frequently Asked Questions (cont.)

Question 6: What is ISO/IEC 17025?

We perform products (raw materials and finished goods) testing in ISO/IEC 17025 certified laboratories. The laboratory developed and validated methods to test for Residual Solvents, Pesticides and Heavy Metals specifically following our True Grade Specifications (see attached Master Product Specifications Document).

ISO/IEC 17025 General requirements for the competence of testing and calibration laboratories is the main ISO standard used by testing and calibration laboratories. In most countries, ISO/IEC 17025 is the standard for which most labs must hold accreditation in order to be deemed technically competent.

Question 7: Why does certification matter?

Certification shows that the company has adequately demonstrated to a third-party that it meets the requirements of a certain standard and is dedicated to continuous improvement, managing risk, and maintaining customer satisfaction. The result of an effective quality system is consistent, safe, and quality products.

Question 8: Do you have a Recall Plan?

Yes, it is a part of Food Safety Plan. Mock recalls are performed semi-annually. We have total traceability from bulk materials to every product sent to every customer.

Question 9: What documents are available on the website?

COA (Certificate of Analysis), SDS (Safety Data Sheets), Quality Statement, Food Safety Statement, ISO 9001:2015 certificate, FSSC 22000 certificate.

Question 10: What documents can be requested from Quality Assurance?

Summary of audit reports, Certificates of Compliance, Safety Reports, Master Ingredient list for each product (with Non-Disclosure Agreement signed).

Question 11: Do you have regulatory registrations, liability insurance, etc?

Yes, we have the following documents: Current Food Processing License, current FDA registration, Liability Insurance. These documents are available per request.

THANK YOU

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