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|  | FOOD PRODUCT SUPPLIER STANDARDS | | DATE ISSUED 8/2/2021 |
| | | | SUPERSEDES NEW |
| ISSUED BY Krystal Janice, FSQA Manager | DOCUMENT NO. FSQA-001-2021 | Page 1 of 7 | |

PURPOSE

Buc-ee's, Ltd. ("Buc-ee's") places the highest importance on Food Safety and Quality Assurance ("FSQA"). This document provides FSQA audit requirements for all food and food-contact product suppliers. For potential Suppliers, all FSQA standards detailed in this document, as well as those provided in the Buc-ee's Supplier Product Compliance Manual, must be met prior to becoming an approved Supplier. Failure to comply with these standards at any time may result in the removal of approved Supplier status.

DEFINITIONS

"Branded Products" and "Private Label" means (1) manufacturing, designing, or packing products incorporating Buc-ee's Intellectual Property, or (2) supplying raw ingredients or bulk products to further processing or package incorporating Buc-ee's Intellectual Property.

"Buc-ee's" means Buc-ee's, Ltd., acting on behalf of itself and as an agent for its affiliates.

"Distributor" means an independent legal entity that sells Products to Buc-ee's on behalf of a Supplier. A Distributor does not manufacturer products but may warehouse, repack, or transport them. Entities classified only as Distributors must ensure all Suppliers meet Buc-ee's standards and provide documentation for all products supplied to Buc-ee's as detailed in this document.

"Manufacturing Co-Packer" means a manufacturer who produces and packages product on behalf of a non-affiliated Supplier.

"Non-Manufacturing Co-Packer" means an entity who packages finished products manufactured by a non-affiliated Supplier in another, separate facility.

"Non-Private Label" or "National Brand" means Supplier that manufactures a product of their own brand at their own facility.

"Supplier(s)" means the person or entity specified in a Purchase Order as the Supplier of products.

FOOD SAFETY QUESTIONNAIRE

Potential Suppliers must complete the Buc-ee's Food Safety & Quality Assurance Supplier Questionnaire and submit all requested documents for review by the Buc-ee's FSQA Team to foodsafety@buc-ees.com. All parties involved in the manufacture, packaging, storage, and distribution of products must complete a questionnaire and provide relevant documentation. Failure to submit documentation will result in non-approval of Supplier products.

AUDIT REQUIREMENTS

- **Manufacturers (including Manufacturing Co-Packers) of Buc-ee's Branded / Private Label Food for Human Consumption**
 - An annual third-party audit confirming certification to any of the food safety schemes recognized by the Global Food Safety Initiative (GFSI) is required

- For food manufacturers of products described in Appendix B, an annual third-party audit conforming to a nationally recognized certification scheme (see Appendix A) is acceptable
- **Manufacturers (including Manufacturing Co-Packers) of Non-Private Label / National Brand Food for Human Consumption and Food Packaging**
 - An annual third-party audit conforming to a nationally recognized certification scheme (see Appendix A) is required
 - For food manufacturers of products described in Appendix B, minimum requirements include a written Food Safety Plan, written Recall and Traceability Plan, pest management program, and an annual regulatory audit or annual independent third-party audit
- **Non-Manufacturing Co-Packers**
 - An annual third-party audit conforming to a nationally recognized certification scheme (see Appendix A) is preferred
 - At a minimum, a written Food Safety Plan, written Recall and Traceability Plan, pest management program, and an annual regulatory audit or annual independent third-party audit is required
- **Food Distribution Centers and Warehouses**
 - An annual third-party audit conforming to a nationally recognized certification scheme (see Appendix A) is preferred
 - At a minimum, a written Food Safety Plan, written Recall and Traceability Plan, and pest management program is required
- **All Produce Growers/Fields/Farms/Ranches/Greenhouses**

At a minimum, an annual third-party Good Agricultural Practices (GAP) certificate is required.
- **Pet Food**

At a minimum, an annual third-party audit conforming to a nationally recognized certification scheme (see Appendix A) is required.
- **Shell Eggs – Additional Requirements**

Controls must be in place to reduce or limit the amount of Salmonella and these controls must be included in the Supplier's HACCP plan.
- **Meat & Poultry – Additional Requirements**
 - For beef, controls must be in place to control E. coli 0157:H7 and they must be included in the Supplier's HACCP plan
 - For poultry, controls must be in place to reduce or limit Salmonella and they must be included in the Supplier's HACCP plan
 - For deli meats (intend to be sliced for use in Branded Products), Suppliers must have a *Listeria monocytogenes* control program including guidelines for sanitation, environmental monitoring, and finished product testing. *Listeria* control program documents may be requested for review at any time
- **Seafood**

All seafood farms and harvest facilities must have an annual Third Party Best Aquaculture Practices (BAP) audit.
- **Alcoholic Beverages**

An annual third-party audit confirming compliance with Current Good Manufacturing Practice (cGMP) as defined under CFR Part 117 Subpart B (example: <https://www.mbaa.com/brewresources/foodsafety>) is preferred.

Suppliers of commodities not listed above may be required to obtain an independent third-party audit at the discretion of Buc-ee’s, and maintain a third-party certification to be eligible to receive Purchase Orders. The Buc-ee’s FSQA Team will exercise sole discretion in determining if an audit or audit program is approved. If an independent third-party audit is not in place, Buc-ee’s reserves the right to conduct a food safety risk assessment and case-by-case evaluation of a Supplier’s facility(ies); however, Buc-ee’s is under no obligation to do so.

If multiple products are supplied to Buc-ee’s, the product with the most stringent audit requirements will determine the applicable standards for the Supplier. If an existing Supplier adds or subtracts products which may impact the applicable audit requirement, they must notify Buc-ee’s FSQA at foodsafety@buc-ees.com.

Suppliers are required to submit copies of their certification, full audit reports, and the corrective action taken for all audit deficiencies, to the Buc-ee’s FSQA Team initially and for each new audit. Supplier is required to keep all certifications and audits updated and Buc-ee’s is to be notified, via email to foodsafety@buc-ees.com, when a new audit occurs. Suppliers are responsible for all costs associated with an audit program.

Buc-ee’s may request copies of regulatory agency inspections at any time, which must be provided to Buc-ee’s within five business days.

If at any time a third-party audit certification is not conducted timely, does not receive a passing score (for GFSI schemes, see Appendix C), or the certification is revoked, the Supplier must immediately notify the Buc-ee’s FSQA Team via email to foodsafety@buc-ees.com. If an audit results in a non-passing score, all documentation must be provided to the Buc-ee’s FSQA Team within five business days along with a written Corrective Action Plan. A re-audit must occur within 90 calendar days, and a passing score must be achieved in order to retain approved Supplier status.

REQUIRED DOCUMENTATION FOR APPROVAL

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| <ul style="list-style-type: none"> • 3rd Party Audit: GFSI, other 3rd party, or GMP certification (refer to audit requirements section) • HACCP or Food Safety Plan (facilities without a 3rd party audit) • Letter of Guarantee or Certificate of Conformance (Food Contact Packaging) • COI (Certificate of Insurance) • Recall Plan and 24-Hour Emergency Contacts | <ul style="list-style-type: none"> • On-boarding • Annual |
| <ul style="list-style-type: none"> • As Applicable: <ul style="list-style-type: none"> ○ Product Label Claim Certificates: Organic, Kosher, Gluten-Free, Non-GMO, Etc. ○ FSVP Compliance Declaration ○ Sanitary Transport Compliance (required for all Distributors) | <ul style="list-style-type: none"> • On-boarding • Annual • Certificate or Policy Renewals • With Any Changes |
| <ul style="list-style-type: none"> • Product Specifications • Nutrition & Ingredients • Product Claims • Environmental Program • Labeling Program • Supplier Approval Program • Allergen Program | <ul style="list-style-type: none"> • On-boarding • Changes to Specifications, Manufacturing, or Procedures |

CUSTOMER COMPLAINTS AND CORRECTIVE ACTION REPORTS (CARs)

Suppliers will be held accountable to ensure compliance with product specifications, Buc-ee's Supplier Product Compliance Manual, and all applicable regulatory requirements. Following notification of a complaint by Buc-ee's to the Supplier, a Corrective Action Report must be submitted to foodsafety@buc-ees.com within five business days detailing the nature of the incident, the root cause, and all corrective action measures already taken or to be implemented.

APPENDIX A

Nationally Recognized Third-Party Certification Schemes:

Acerta

AIB International

BSI Group

Control Union

Eagle Food Registrations

Eurofins

FoodChain ID

Food Safety Net Services

Intertek

Lloyd's Register (LRQA)

Mérieux Nutrisciences

NSF International

Primus Auditing Operations (JS Audit Group)

Safe Food Alliance

SCS Global Services

UL Food and Beverage Safety Solutions

Validus

APPENDIX B

Foods with reduced risk of bacterial or microbial growth:

- acidic foods with a pH below 4.6
- dehydrated foods or foods with water activity at or below 0.85 Aw
- salted foods (foods preserved using salt, not to be confused with salty foods)
- high sugar foods
- canned or vacuum-packed foods (sealed and unopened)
- shelf-stable foods

Examples (including, but not limited to):

- dried fruits
- baked goods: bread (no dairy or cheese filling), brownies, cookies, muffins (no dairy filling), crackers
- dried foods such as cereal, rice, pasta, chips
- popcorn
- sugar confectionary: chocolate bars, candies, gums, toffee
- pickled vegetables (vinegar base, pH 4.6 or less)
- jam and preserves (pH 4.6 or less)
- applesauce
- syrups
- vinegar
- relish (vinegar base, pH 4.6 or less)
- freeze-dried foods
- carbonated beverages (non-alcoholic)
- iced tea
- pasteurized fruit juices

APPENDIX C

GFSI Audit Score Requirements:

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|-------------------|--------------|
| BRCGS | B or above |
| FSSC 22000 | “Successful” |
| IFS | 85 or above |
| SQF | 85 or above |