TRUE TERPENES

Third-Party Audited & Certified
GMP/ISO9001/FSSC22000

COMPLIANCE PACKET

2024

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ABOUT US

The #1 Terpene Innovator

Headquarted in Portland, OR, True Terpenes manufactures undiluted terpenes, flavors, functional ingredients and blends, enabling small and large companies worldwide to differentiate their products under the highest safety standards known to our industry.

Our organization is comprised of over 100 professionals, including flavor chemists, chemical engineers, QA/QC professionals and safety inspectors, all trained in Good Manufacturing Practices (GMP), Food Safety and Food Defense.

OUR MISSION

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

TRUE TERPENES

World-Class Quality

Proud to be the only
GMP/ISO9001/FSSC22000
Third-Party Audited & Certified
Terpene Blend Manufacturer

True Terpenes positive pressure manufacturing clean room ▲

YOUR EXTENDED TEAM

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

TRUE EXPERTISE ▶

FORMULATION + R&D
Highly trained analytical and formulation chemists work in concert with our Science Advisory Board to push innovation and discovery initiatives.

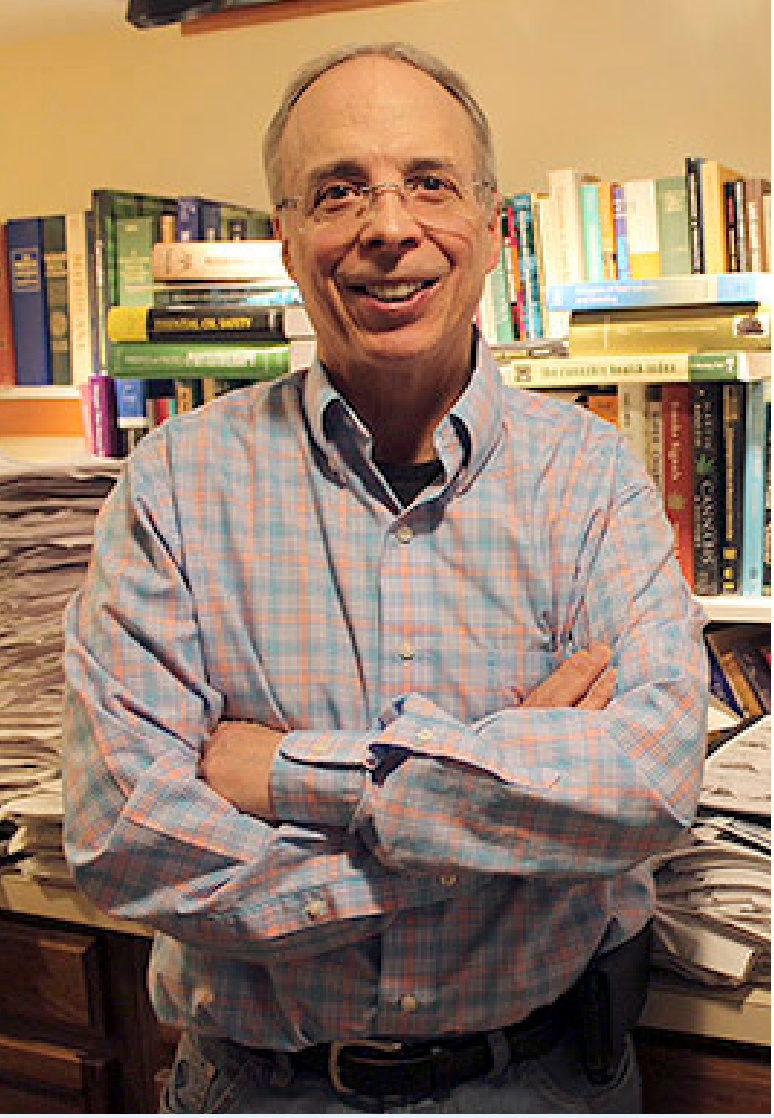
QUALITY ASSURANCE
We deliver an elevated level of rigor to ensure that our products are trackable, clean, and compliant at the highest U.S. standards.

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 mistakes.

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



COLLABORATING WITH DR. ETHAN RUSSO

"True Terpenes is a prime example of a company dedicated to the science of terpenes and terpenoids and I've been thrilled to continue my work with their products and team over the past few years as it aligns with and enhances my personal research," said Dr. Ethan Russo.

"The company's products are particularly attractive for me because of their purity, high standard of manufacturing, and commitment to quality assurance, which is not standard across the industry."

▲ ETHAN RUSSO, MD IS A FOUNDING MEMBER OF THE TRUE TERPENES SCIENCE ADVISORY BOARD.

WE MAKE FLAVORS WITH PURPOSE

The True Terpenes Science Advisory Board (SAB) unlocks the functional benefits of terpenes and cannabinoids.

AUTOMATION

Our high throughput system delivers thousands of production units daily.

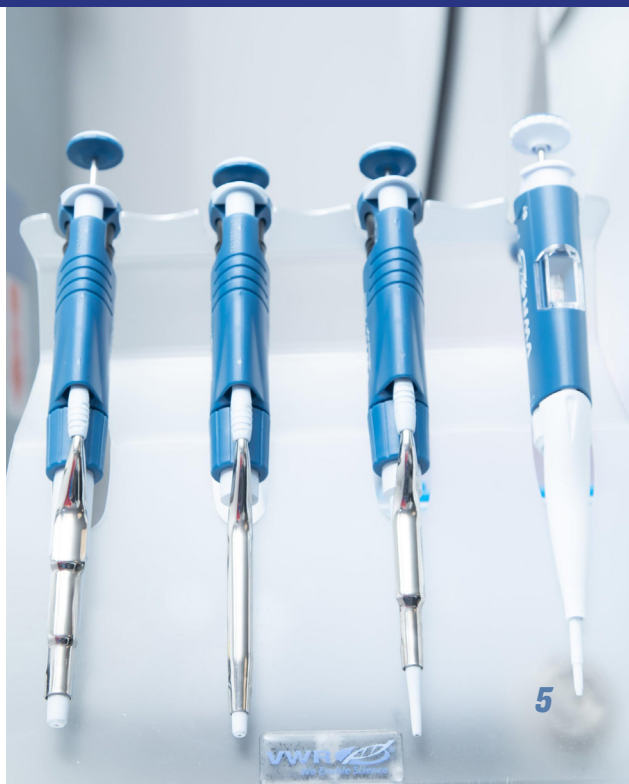
SCALABLE MANUFACTURING

WE'VE CREATED A SYSTEM THAT 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. Our deep institutional knowledge on terpenes is based on 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 and contaminated, they may lose their potency, aroma and flavor. True Terpenes can help your company 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 laboratory 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 certified formulation laboratory in Oregon.

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, Hemp-Derived Terpenes 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 a cGMP facility conforming to FSSC 22000 and ISO 9001:2015 quality standards.

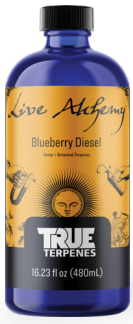
All raw materials are tested in an ISO/IEC 17025 accredited laboratory following our Master Product Specifications. Certificate of Analysis (COA) and Safety Data Sheets (SDS) are available for each of our products. Other valuable documentation such as Certificates of Compliance (COC) and Natural Certificates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

Terpene Strain Profiles
Our classic profiles using detailed plant analytics to recreate terpenes found in nature.

Infused Strain Profiles
Effect-rich strains paired with bold complementary flavors and aromas.

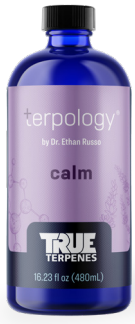
Terpene Flavor Profiles
Fragrant, high fidelity, and packs a punch with an aromatic terpene boost.

Viscosity Extract Modifier
Made from terpenes found natively in cannabis. The only natural and aroma neutral extract modifer.



Live Alchemy
A hybrid series that combines our classic strains and select Hemp-Derived Terpenes.

Live Resin
An ultra premium 100% hemp terpene line utilizing the best flower from the most potent strains.



Terpology
Proprietary effects blends formulated by Dr. Russo, pioneering researcher of the Entourage Effect.

Isolates
Isolates are botanically sourced & distilled for high purity.

TRUE GRADE QUALITY

Our isolated terpenes are carefully distilled to ensure quality. Below is a quick guide to the quality markers that we use to showcase True Grade™ standards across our products.

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

Rigorously tested against separation, cloudiness, color change and unacceptable levels of aroma change.

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

True Terpenes ships its terpene products worldwide.

TRUE TERPENES

LIVE RESIN®

Live Resin is our ultra premium hemp terpene line. Featuring 100% purity, Live Resin is an exclusive, iconic strain collection for the cannabis connoisseur.

OUR PROPRIETARY PROCESS

Our distillation processes are unique and unlike anything else on the market. This process allows for the Live Resin products to be controlled from seed to finished product.

Chemovars are backcrossed for the removal of THC while maintaining a unique flavor profile. Only the best phenotypes are chosen.

Thousands of plants were bred across hundreds of strains to capture compliant material with a unique and memorable flower smell.

EXCLUSIVE IP & PROPRIETARY FORMULAS

The True Terpenes Custom Formulations Program helps our clients outpace the dynamic cannabis market. Our customs service delivers control, precision and differentiation though compelling and unique terpene formulations.

- Your own team of IFT-trained flavor chemists.
- Rapid cycle customization from over 1M flavor combinations.
- GMP/ISO/FSSC manufacturing.
- Analytical integration within our formulations lab: GC-MS analysis with liquid and headspace sample injection and terpene profiling.
- Exclusive ownership of proprietary formulas to deliver differentiation for clients.
- Personalized regulatory guidance from our QA team.

TRUE TERPENES

Live Alchemy®

HEMP + BOTANICAL TERPENES

Where Art & Science Meet Flavor

Live Alchemy is a hybrid series that combines our botanical terpenes with select, estate-grown Hemp-Derived Terpenes (HDT). The result is a line of accessible, unique and powerful flower aromas that appeal to a growing market of discerning cannabis customers.

Live Alchemy represents the “Art of the Blend,” by introducing HDT to add subtlety, nuance and dimension to our strains.

terpology®

By Dr. Ethan Russo

TRUE TERPENES

TERPOLOGY PRODUCTS

• Calm • Creative • Energy • Focus • Rest • Recovery

DOCTOR FORMULATED

The Terpology® Effects-Based Terpene Profiles formulated by Dr. Ethan Russo are 100% all-natural and botanical terpene blends that encourage specific mood-enhancing experiences. The compounds contained within each profile are naturally found in cannabis.

• Proprietary effects blends formulated by Dr. Russo, doctor, pharmacologist and pioneering researcher of the Entourage Effect.
• Applicable for all consumer, functional and wellness applications.
• 30 years of terpenes and "Entourage Effect" research for proven results.

GLOBAL QUALITY SYSTEMS

Third-Party Audited & Certified by Eagle Registration

ISO 9001:2015

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

GMP

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 mitigate 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.

FSSC 22000

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 product 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 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: info@trueterpenes.com.

Document Control

Secure Facilities

SDS, COA & SOPs

Product Trackability

Chain of Custody

Training & QC

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	8210 NE Mauzey Ct, Hillsboro, OR 97124
Manufacturing Address	8210 NE Mauzey Ct, Hillsboro, OR 97124
Phone Number	(888) 954-8550
Email	info@trueterpenes.com
Number of Years in Business	< 8+ years
Number of Personnel	~100 Employees
What is the square footage of the manufacturing facility?	10,000 sq ft.
Is the QA department independent of production?	● Yes ○ No

Self-Audit Form Section 2: 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?	●	○	○	

Self-Audit Form Section 3: Quality Systems

	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 “QUARANTINE” 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).
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

	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 in conjunction with FEFO.
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 1 year past expiration date..
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 refreshed annually.
Is there a documented recall plan in place?	●	○	○	
Is this challenged on a regular basis (ie. mock recall?)	●	○	○	Mock Recalls are performed annually.
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 equipment.
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 every 2 months.
Are Food Safety/HACCP meetings documented and records maintained?	●	○	○	
Are key personnel trained in Food Safety and Food Defense?	●	○	○	All personnel trained.

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?	○	●	○	
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?	●	○	○	
Is eating and drinking permitted in designated areas only?	●	○	○	
Are personnel, including visitors, with contagious diseases/boils/ septic cuts/sores excluded from production areas?	●	○	○	
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

	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 and screens.
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?	●	○	○	

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 are available upon request.

Item / Material	Terpenes and Terpene Blends
Lot Code Example	YYMMDDNN e.g. 23042099
Lot Code Interpretation	23 = Last Digit of Year Manufacture 04 = Month of Manufacture 20 = Date of Manufacture 15 = Unique Number

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

The following documentation is provided by QA upon request: Product Specifications, Lot COA, Certificate of Compliance, Natural and other applicable product certificates.

ONLINE

OUR PROCESS

▸ trueterpenes.com/our-process

▾ FINISHED GOODS

100+ fresh profiles ready to ship daily.

EAGLE Food Registrations Inc.
SERVICE • INTEGRITY • VALUE

ANAB
ANSI National Accreditation Board
ACCREDITED
ISO/IEC 17021-1
MANAGEMENT SYSTEMS CERTIFICATION BODY

Certificate of Registration

The Food Safety Management System of:

Bulk Natural LLC, dba True Terpenes

at

8210 NE Mauzey Court, Hillsboro, Oregon 97124 USA

has been assessed and determined to comply with
the requirements of

Food Safety System Certification (FSSC) 22000
(Version 5.1)

Certification scheme for food safety management systems consisting of the following elements:
ISO 22000:2018, ISO/TS 22002-1:2009 and additional FSSC 22000 requirements (Version 5.1).

This certificate is applicable for the scope of:

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

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

Certificate of Registration No: 6679

Date of Certification Decision: December 8, 2022

Initial Certification Date: December 8, 2022
Issue Date: December 8, 2022
Valid Until: December 7, 2025

FSSC 22000

Authorized By: Kelly Abbott

Director of Certification and Technical Services

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

EAGLE Registrations Inc.
SERVICE • INTEGRITY • VALUE

ANAB
ANSI National Accreditation Board
ACCREDITED
ISO/IEC 17021-1
MANAGEMENT SYSTEMS CERTIFICATION BODY

MEMBER OF MULTILATERAL RECOGNITION ARRANGEMENT
IAF

Certificate No. 6680 (Certified December 8, 2022)
December 8, 2022 through December 7, 2025

Certificate of Registration

This is to certify that the Quality Management System of

Bulk Natural LLC, DBA True Terpenes

8210 NE Mauzey Court, Hillsboro, Oregon 97124 USA

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 and Technical Services

EAGLE Food Registrations Inc.
SERVICE • INTEGRITY • VALUE

Certificate No. 11686
August 18, 2023 through November 1, 2024

Certificate of Completion

Bulk Natural LLC, DBA True Terpenes – Hillsboro

8210 NE Mauzey Court
Hillsboro, Oregon 97124 USA

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

EAGLE GMP Audit including HACCP Principles

Design and Manufacturing of Terpenes, Flavor Ingredients, and Isolates

Authorized by:
Lindsey Stafford
Director of Certification

40 N. Main St. | STE 1880
Dayton, OH 45423
+1.937.293.2000
+1.800.795.3641
www.eaglecertificationgroup.com

Quality Management System Manual (QMSM) Table of Contents

Quality Statement

True Terpenes' mission is to produce and deliver the highest quality and consistent products to our customers throughout the world. Further, we promise to provide leadership, education and advocacy in assuring 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 products 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.

Product Safety Statement

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

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

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

1.3 Specific Policies

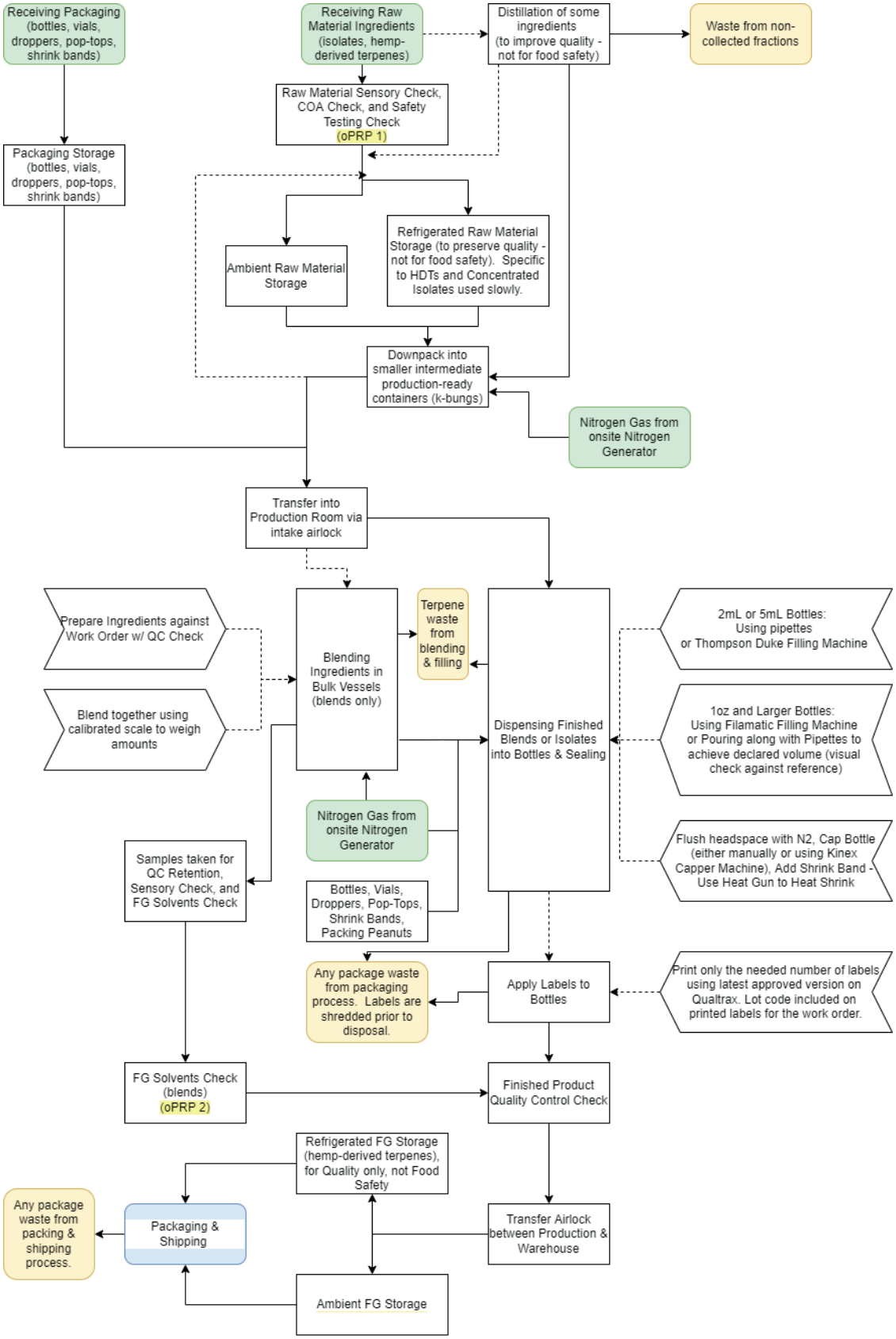
- Supplier Qualification: All suppliers, vendors, and laboratories must be qualified and approved in order to ensure all materials are purchased from secure, and reliable sources.
- Safety Testing: All new lots of terpene isolates are tested for residual solvents, pesticides and heavy metals prior to 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 facilitate the delivery of the safest most reliable products in the industry 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 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.

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

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; 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.

STERILITY

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		Alert Limit Levels (ppm)[1]
Residual Solvents Specifications		
1,2-Dichloroethane		1ppm
Benzene		1ppm
Chloroform		1ppm
Ethylene Oxide		1ppm
Methylene Chloride		1ppm
Trichloroethylene		1ppm
1,2-Dimethoxyethane		5ppm
1,4-Dioxane		380ppm
1-Butanol		80ppm
1-Pentanol		1000ppm
2,2-Dimethylbutane		50ppm
2,2-Dimethylpropane (Neopentane)		750ppm
2,3-Dimethylbutane		50ppm
2-Butanol		160ppm
2-Butanone (Methylethylketone)		300ppm
2-Ethoxyethanol		25ppm
2-Methylbutane (Isopentane)		750ppm
2-Methylpentane		50ppm
2-Propanol (IPA or Isopropyl Alcohol)		500ppm
3-Methylpentane		50ppm
Acetone	*note: acetone is a natural degradation product of some terpenes. Some products, especially when exposed to heat (including during GC-MS analysis) may form acetone. As a result, the product COA may report a result higher than 750 ppm, and limits up to 5000ppm may be used as the standard for product release.	750ppm*
Acetonitrile		60ppm
n-Butane		500ppm
Cumene (Isopropyl Benzene)		70ppm

Master Product Specifications

Residual Solvent	Alert Limit Levels (ppm)[1]
Cyclohexane	470ppm
Dimethyl Sulfoxide (DMSO)	1000ppm
Ethanol	1000ppm
Ethyl Acetate	400ppm
Ethyl Ether	500ppm
Ethylbenzene	30ppm
Ethylene Glycol	60ppm
n-Heptane	500ppm
n-Hexane	50ppm
Isobutanol (2-Methyl-1-Propanol)	500ppm
Methanol	250ppm
Methylpropane (2-Methylpropane or Isobutane)	500ppm
N,N-Dimethylacetamide	50ppm
N,N-Dimethylformamide	50ppm
n-Pentane	750ppm
n-Propane	800ppm
Propyl Acetate	500ppm
Pyridine	25ppm
Tetrahydrofuran	250ppm
Toluene	150ppm
Xylenes (total among m-, o-, and p-xylenes)	150ppm
Butanes (total)	5000ppm
Hexanes (total)	290ppm
Pentanes (total)	5000ppm
Xylenes (total) + Ethylbenzene	2170ppm
Total Residual Solvents	5000ppm

Master Product Specifications

Residual Pesticide	Alert Limit Levels (ppm)[1]
Residual Pesticide Specifications	
Abamectin	0.07
Acephate	0.05
Acequinocyl	0.05
Acetamiprid	0.05
Aldicarb	0.1 (ND)
Allethrin	0.1
Azadirachtin	0.5
Azoxystrobin	0.01
Benzovindiflupyr	0.01
Bifenazate	0.01
Bifenthrin	0.1
Boscalid	0.01
Buprofezin	0.01
Captan	0.7
Carbaryl	0.025
Carbofuran	0.01 (ND)
Chlorantraniliprole	0.01
Chlordane (cis & trans)	0.1 (ND)
Chlorfenapyr	0.1 (ND)
Chlorpyrifos	0.01 (ND)
Clofentezine	0.01
Clothianidin	0.025
Coumaphos	0.01 (ND)
Cyantraniliprole	0.01
Cyfluthrin	1.0
Cypermethrin	1.0

Master Product Specifications

Residual Pesticide	Alert Limit Levels (ppm)[1]
Cyprodinil	0.01
Daminozide	0.05 (ND)
DDVP (Dichlorvos)	0.05 (ND)
Deltamethrin	1.0
Diazinon	0.01
Dimethoate	0.01 (ND)
Dimethomorph	0.05
Dinotefuran	0.05
Dodemorph	0.05
Endosulfan sulfate	2.5
Endosulfan-alpha	2.5
Endosulfan-beta	2.5
Ethoprophos	0.01 (ND)
Etofenprox	0.01 (ND)
Etoxazole	0.01
Etridiazole	0.15
Fenhexamid	0.1
Fenoxycarb	0.01 (ND)
Fenpyroximate	0.02
Fensulfothion	0.01
Fenthion	0.01
Fenvalerate (sum)	0.1
Fipronil	0.1 (ND)
Flonicamid	0.025
Fludioxonil	0.01
Fluopyram	0.01
Hexythiazox	0.01

Product Specifications

Residual Pesticide	Alert Limit Levels (ppm)[1]
Imazalil	0.01 (ND)
Imidacloprid	0.01
Iprodione	0.5
Kinoprene	1.25
Kresoxim-methyl	0.1
Malathion	0.01
Metalaxyl	0.01
Methiocarb	0.01 (ND)
Methomyl	0.025
Methoprene	1.0
Methyl-Parathion	0.03 (ND)
Mevinphos	0.025 (ND)
MGK-264	0.05
Myclobutanil	0.01
Naled	0.1
Novaluron	0.025
Oxamyl	0.5
Paclobutrazol	0.01 (ND)
Pentachloronitrobenzene (Quintozene)	0.1
Permethrins	0.04
Phenothrin	0.025
Phosmet	0.01
Piperonyl butoxide	1.0
Pirimicarb	0.01
Prallethrin	0.05
Propiconazole	0.1

Product Specifications

Residual Pesticide	Alert Limit Levels (ppm)[1]
Propoxur	0.01 (ND)
Pyraclostrobin	0.01
Pyrethrins	0.025
Pyridaben	0.02
Resmethrin	0.05
Spinetoram	0.01
Spinosad	0.01
Spirodiclofen	0.25
Spiromesifen	0.03
Spirotetramat	0.01
Spiroxamine	0.01 (ND)
Tebuconazole	0.01
Tebufenozide	0.01
Teflubenzuron	0.025
Tetrachlorvinphos	0.01
Tetramethrin	0.05
Thiacloprid	0.01 (ND)
Thiamethoxam	0.01
Thiophanate-methyl	0.03
Trifloxystrobin	0.01
Heavy Metals	**Alert Limit Levels (ppm)[1]**
Heavy Metals Specifications	
Arsenic	**0.14**
Cadmium	**0.10**
Lead	**0.29**
Mercury	**0.1**

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 manufacturing facility 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 promote the supply of safer 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 is the program for identification of health hazards in the supply and production processes and the systematic controls to address them. HACCP is a core component of cGMP manufacturing, and a good HACCP plan considers and mitigates biological, chemical, and physical health hazards. True Terpenes' HACCP plan systematically considers every step of our process against every hazard categories, and we have pre-requisite programs (PRPs) and operational pre-requisite programs (oPRPs) to cover all identified hazards.

Frequently Asked Questions

Question 6: What is ISO/IEC 17025?

ISO/IEC 17025 is the main ISO standard used by testing and calibration laboratories. We require any external laboratories we use for compliance testing to have ISO 17025 accreditation for the specific testing we ask them to conduct on our behalf.

ISO/IEC 17025 General requirements for the competence of testing and calibration laboratory is the main ISO standard used by testing and calibration laboratory. 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.

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?

On our website, you can find our updated third party certifications (cGMP, ISO 9001:2015, and FSSC 22000) as well as product specifications, COAs, and SDSs. If you are unable to find the document you need on our website, please reach out to our Customer Service team.

Question 10: 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

We Value Your Business

Create with Confidence

Contact Your Dedicated Sales Representative or
visit trueterpenes.com for samples.

Flavor is Our Passion. Quality is Our Promise

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