

lessons learned, and our goals moving forward to improve our product, local communities, and the environment.

❖ **Audit Process**

Mazzetta Company's quality assurance is comprised of three main pillars; third-party food safety audits, internal food safety audits, and third-party social audits. Mazzetta Company participates in the USDC Voluntary Seafood Inspection Program and also conforms to the USFDA HACCP food safety guidelines; however, it is our on-the-ground presence and our extremely high standards, driven in large part by our layered audit processes that separate Mazzetta Company from its competitors.

Mazzetta Company employs full-time food scientists with advanced degrees and extensive experience that perform all of our internal audits. Our commitment to food safety and quality assurance requires an extremely high level of skill and we are very proud of the quality people we have secured to take on the important challenges inherent in this facet of our operations.

A typical Mazzetta (internal) food safety audit would be conducted in line with federal requirements, general seafood industry standards, as well as Mazzetta-specific requirements. Many of the farms and facilities Mazzetta works with are regarded among the most modern and professionally managed seafood companies in the world. They routinely have incorporated many state-of-the-art production procedures, comprehensive training and employee medical screening programs, and sophisticated recall and traceability monitoring procedures. In addition, their record keeping systems, HACCP, SSOPs, and approved vendor control programs are excellent and their laboratory analytical capabilities and sanitation methods exceed industry standards.

For reference, a Mazzetta food safety audit is an extremely comprehensive process. It may result in a mere twenty or so page document, accompanied by a large volume of photos; however it covers in great detail every aspect of production. Beginning with the administration, the condition of the facility, employee health and training protocols, through the full production cycle of raw materials leading to finished products, cleaning and sanitation, construction and repair of equipment, transportation, storage, and of course food safety and security, traceability and hazard analysis. There is no question our internal standards at Mazzetta exceed those required by the



Mazzetta Company's Jeff Goldberg visiting with Vietnamese suppliers.



federal government and those accepted as industry standards. The frequencies of these audits vary by facility and region, but occur at least annually.

In addition, third-party food safety audits are conducted at least annually at all facilities Mazzetta does business with. As these are more widely understood across industry we will not spend a lot of time elaborating. Mazzetta Company employs two well-established industry leaders; SGS and NSF, to perform these audits worldwide.

Third-party social audits represent the most emergent of our QA pillars. Although again proprietary information, it would not be uncommon for these audits to address monitoring and compliance, child labor, forced labor, discipline, harassment and abuse, working hours, wages and benefits, health and safety and freedom of association.

Under Audit and Sourcing Goals, which is contained later within this section of the Report, we'll discuss our goals to continue expanding both the number and scope of our internal audits.

❖ **Responsible Sourcing**

Responsible sourcing is a critically important piece of this discussion, because we believe setting and achieving goals in responsible sourcing leads to new achievements throughout the distribution chain. In 2009 Mazzetta Company made a bold decision to discontinue sourcing from regions where we do not maintain on-the-ground auditors. The following case study explains some of the thought process behind that decision as well as the social audit goals we have established for the near term.

Case Study: Bangladesh

In April 2008 Mazzetta Company was made aware of a forthcoming report by The Solidarity Center, a nonprofit group that is a global advocate for labor unions and worker's rights. The report was entitled "*The True Cost of Shrimp*" and focused on the shrimp industry in Asia. On the whole, the report documented abuses of worker's rights and human rights violations of the worst kind. Prior to having received a copy of the report, we were made aware that Mazzetta Company was cited in the report, but not the context of the allegations. This was obviously of great concern to us and thus we immediately moved to condemn all of the alleged human rights atrocities contained in the report and to maintain that the farms and

