



Summary of Compliance

Our Mission

To be the industry leader of food grade oils in the eyes of our customers, employees and suppliers by providing high quality, safe, authentic, and legal products in accordance with our food safety and quality policies at competitive prices and exceptional customer service.

January 6, 2026

Letter of Guarantee

Dear Valued Customer,

The quality, safety and authenticity of our products are of the highest importance to Colony Products. We strive to consistently provide our customers with high quality products that meet and exceed our customer expectations while ensuring our operation and products comply with all applicable laws, regulations and Codes of Practices and Standards of the United States and the destination countries in which our products are sold.

Please be advised this declaration is not based on specific analysis of our products or raw materials, and is based on our 3rd party certification, production process knowledge and the information obtained from our suppliers. In case any modifications or further processing to the products supplied by Colony Products are required, the user must ensure the products continue to meet all applicable requirements.

This declaration will continue in full force and effect until terminated by written notice. Such notice of termination shall be effective only for the orders placed after receipt of such notice.

This guarantee is continuing and shall be in full force until revoked in writing. Such notice of termination shall be effective only for the orders placed after receipt of such notice.

Thank you for considering Colony Products as your source for quality food grade oils.

Sincerely,



Michelle Graham
President

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Allergen Handling

Colony Products' policy is intended to identify the requirements and procedures to be used in this facility in order to properly handle allergen products for distribution to comply with the United States FDA Food Allergen Labeling and Consumer Protection Act of 2004, and to ensure safety, quality, legality and authenticity of finished products.

President is responsible for training, implementation and monitoring of this procedure. All records pertaining to this procedure shall be maintained and kept on file as part of general record keeping practices.

Any changes to this procedure shall be approved by the HACCP Coordinator prior to implementation.

No allergens shall be handled within the processing area. The following approved allergens may be stored in the designated allergen storage area in the warehouse away from the processing area:

- Gluten containing cereals and derivatives
- Soy and derivatives
- Sesame and derivatives

For labeling purposes, Section 203 of the U.S. Food and Drug Administration's (FDA) Food Allergen Labeling and Consumer Protection Act of 2004 (FALCPA) states the term "major food allergen" means:

“(1) Milk, egg, fish (e.g., bass, flounder, or cod), Crustacean shellfish (e.g., crab, lobster, or shrimp), tree nuts (e.g., almonds, pecans, or walnuts), wheat, peanuts, and soybeans.

“(2) A food ingredient that contains protein derived from a food specified in paragraph (1), except the following:

“(A) Any highly refined oil derived from a food specified in paragraph (1) and any ingredient derived from such highly refined oil.

Vegetable oils are highly refined in a process including de-gumming, neutralizing, bleaching, and deodorizing. The resulting oil is left virtually free of allergenic proteins, according to the Institute of Shortening and Edible Oils (ISEO).

Benzo(a)pyrene

Colony Products' Refined, Bleached, Deodorized (RBD) oils (excluding coconut oil) meet the following limits for Benzo(a)pyrene intended for direct human consumption or use as an ingredient in food per Regulation (EC) No 1881/2006. Benzo(a)pyrene: <2 µg/kg

Bioengineering

Refined Bleached Deodorized (RBD) vegetable oils and mineral oil products from Colony Products Co., INC are not bioengineered or are manufactured using ingredients that have been subjected to refining process or under certain process conditions which makes the modified genetic material in the product rendered undetectable using common testing methods. As such, our products DO NOT require BE disclosure as per National Bioengineered Food Disclosure Standard ruling release by the United States Department of Agriculture (USDA).

Bromate

Colony Products' oils do not contain bromate.

CGMP & HARPC

Colony Products' procedure is intended to identify the requirements and procedures to be used in this facility in order to produce safe, legal, authentic and wholesome food as required by the Food and Drug Administration Current Good Manufacturing Practice (CGMPs), Hazard Analysis, and Risk-Based Preventive Controls for Human Food.

Food safety plans shall be developed and applied by Preventive Controls Qualified Individual (PCQI), an individual who qualified through job experience to develop and apply a food safety system. A written preventive controls program shall be implemented to ensure all hazards requiring preventive controls are controlled to significantly minimize or prevent each hazard to ensure our finished products do not become adulterated.

Change Notification

Colony Products will provide timely communication of any significant changes in products to include but not limited to changes in product composition that could have an impact on product formulation. All changes must be approved in writing prior to the first shipment. The communication will occur prior to the implementation of:

- Change of supplier or manufacturer including changing or addition of manufacturing sites.
- Change in formula or process.
- Change in specification, ingredient statement or packaging information.
- Change of status of the following: Allergens, Kosher or GMO.
- Change in lot coding system and labeling.

Code of Conduct, Transparency, Sustainability and Social Responsibility

Colony Products' expectations for its employees (including ownership and management), suppliers, and service providers in the areas of environmental protection, social responsibility, authenticity, and legality. Our purpose is to reflect Colony Products' commitment to managing its business activities in full compliance with applicable laws and regulations, and to be guided by the highest standards of integrity and ethical business conduct.

These policies are dynamic and evolving to address changing regulatory guidelines, scientific recommendations, ongoing protection of employees, and to continually strive to manage the company's impact on the environment and community in a positive manner. With the interest of protecting our natural resources, Colony Products views sustainability as a business approach that is vital to long-term success. We value our resources by taking into consideration how Colony Products operates in the ecological, social and economic environment. This is done through responsible purchasing, manufacturing and employment practices. In addition, we annually conduct a risk assessment of our supply chain and production process to ensure the authenticity of the products supplied. It is our policy to develop, implement and annually review written policies and procedures to prevent irresponsibility in harvesting, fraudulent and intentional substitution, misrepresentation, dilution, or addition(s) to the products supplied.

Colony Products is committed to honoring the rights of our employees, as well as complying with all applicable wage and hour laws in all areas of the world where we have operations. In addition, Colony Products expects our business partners to treat their employees with dignity and respect and follow local employment laws including those against child labor, slavery, and human trafficking. We will never knowingly use any suppliers who employ or exploit legally underage workers or forced labor. We do not condone such practices within our company, or any other that we do business with. Colony Products also will never punish any employee for reporting any concern, claim of discrimination, harassment, or internal dispute to the management of the company. We take all reports seriously.

Furthermore, Colony Products respects the right of every person to participate in all aspects of employment without regard to their personal characteristics or beliefs (for example, their race, religion, or sex). Our policies and practices result in employment decisions being made on the basis of workers' ability to do the job, and not on their personal characteristics or beliefs.

Crisis/Food Defense/Recall Committee Contact Information

Michelle Graham – President

Emergency Contact

Recall / Food Defense / Crisis Coordinator

office: (909) 307-3700

cell: (503) 522-7886

michelle@colonyproducts.net

John Graham – Director of Operations

Secondary Emergency Contact

cell: 909-253-2494

office: 909-307-3700

john@colonyproducts.net

Mike Brewer – Vice President / QA Manager

office: (909) 307-3700

cell: (760) 413-9651

mike@colonyproducts.net

Michelle Brewer – Accounting / Customer Service

office: (909) 307-3700

cell: (760) 636-8067

m.brewer@colonyproducts.net

Mark Torres – Facility Manager / QA

cell: (909) 786-6353

office: (909) 307-3700

mark@colonyproducts.net

Customer Complaint / Continuous Improvement

Colony Products' policy is intended to identify the requirements and procedures to be used in this facility in order to effectively record, investigate and resolve customer complaints for continuous improvement of the overall Quality Management System.

President is responsible for training, implementation and monitoring of this procedure. All records pertaining to this procedure shall be maintained and kept on file as part of general record keeping practices.

Any changes to this procedure shall be approved by the HACCP Coordinator prior to implementation.

Elemental Impurities

Colony Products' mineral oils comply with: USP <232> and EMEA, Elemental Impurities, for metal catalysts and metal residues, and elemental impurities ICH guideline Q3D.

Environmental Policy

Colony Products' environmental program is in place to identify any potential risks in the production of pathogens and spoilage organisms and minimize those risks:

- Verification of the effectiveness of cleaning and disinfecting cycles, including hygiene procedures.
- Determination of legal requirements, control limits, and the presence of pathogens in environment, product, and food contact surfaces.
- Determination of the frequency required for testing and target organism
- Evaluation of results and recording.
- Determination of the frequency required for cleaning and disinfecting.
- Training for all the personnel involved in the process to operate the environmental control of the company.

FDA Bioterrorism Act and FSMA

Colony Products is aware, and in compliance with requirements under the Food Safety Modernization Act (FSMA) and is current on its' registration under the FDA Bioterrorism Act. As a manufacturer in the United States, we are required to be compliant with 21 CFR 117: Current Good Manufacturing Practice, Hazard Analysis, and Risk-Based Preventive Controls for Human Food.

- A Food Safety Plan has been written and implemented, and included the following: Hazard Analysis, Preventive Controls, Risk-Based Supply Chain Program and Recall Plan
- In addition, please note the Current Good Manufacturing Practices have been updated under this rule.

We also hereby confirm that Colony Products Co., Inc, Fed ID #95-1831959, has updated its FDA Bioterrorism registration in accordance with the law, and is committed to taking all possible steps to ensure there is never an interruption to the flow of products to its customers. Please feel free to contact us with any questions regarding Colony Products' registration.

COMPANY NAME: Colony Products Company, Inc., 1931 W. Park Ave., Redlands, CA 92373
*UPDATED REGISTRATION NUMBER: *****8066*

Filters/Screens

Colony Products' oil is loaded out through a minimum filter of 10 microns. Filters are placed in the following locations:

- Connection between the bulk tanker and the bulk storage
- Connection between the tanks and the blenders
- Connection between the tanks and the finished product packaging
- Connection between the blender and finished product packaging

Food Defense and Food Fraud

Colony Products has developed and implemented a written food defense plan and has also completed vulnerability assessments against fraud and deliberate adulteration of its raw materials. These assessments have been audited for compliance to the GFSI Global Standard for Food Safety. Where significant vulnerabilities were identified, strategies to minimize or prevent such vulnerabilities were implemented as applicable. Food Defense and Food Fraud Programs have been challenged annually and the records has been documented and maintained. Additionally, Colony Products is registered with the FDA under the Public Health Security Bio-terrorism Preparedness and Response Act of 2002.

Food Grade/GRAS/RTE

Colony Products' oils are manufactured with Food Safety and are considered GRAS (Generally Recognized as Safe) by FDA standards and RTE (Ready to Eat). All Colony Products' oils are fit for human consumption and cosmetic grade applications as per the regulations of the country of use. Packaging is food grade and complies with all regulations regarding food contact.

Foreign & Extraneous Material Control Policy

Colony Products' policy is intended to identify the requirements and procedures for the management of foreign and extraneous materials in this facility in order to effectively control the risks associated with these materials in the areas where no alternative materials can be used or no effective protections are available.

Production Manager is responsible for training, implementation and monitoring of this policy. All records pertaining to this policy must be maintained and kept on file as part of record keeping.

Production Manager shall work with the QA Manager to make an inventory list of all glass and brittle plastic materials in the facility such as light bulbs, glass windows, skylights and packaging materials. The Glass and Brittle Plastic Material Inventory List shall be updated as necessary at the time of monthly GMP inspection.

FSVP

Colony Products is aware, and in compliance with requirements under the Foreign Supplier Verification Program (FSVP) will be identified as the FSVP “importer” for all ingredients and food products that we import into the United States.

As a manufacturer in the United States, we are required to be compliant with 21CFR 1.503 requires that the importer use a U.S. qualified individual to perform all FSVP activities.

Gluten

For labeling purposes, the U.S. Food and Drug Administration permits the term ‘gluten-free’ to be claimed for a food under certain conditions. One condition is that the food is ‘inherently gluten free.’ All oilseeds utilized for Colony Products vegetable oils are considered to be ‘inherently gluten free.’ Vinegars and mineral oil are also considered to be ‘inherently gluten free.’

A second condition is ‘any unavoidable presence of gluten in the food is below 20 ppm gluten.’ Highly refined oils from the United States have been described to contain 1 ppm or less protein. Colony Products' oils are highly refined (unless otherwise noted) following standard industry practice. This practice makes Colony Products' vegetable oils reflective of the aforementioned highly refined oils noted to contain 1 ppm or less protein. In addition, all Colony Products vegetable oils do not have wheat as an ingredient or processing aid. As a result of these conditions and to the best of our knowledge, Colony Products vegetable oils would be suitable for food claimed as ‘gluten free.’

HACCP Plan

This policy is intended to identify the requirements and methods to be used in this facility in order to develop and maintain a HACCP Plan for Pan Release Oils, and to systematically identify, evaluate and control food safety hazards based on the BRC Global Standard for Food Safety requirements and the following Codex Alimentarius HACCP principles.

HACCP Team has conducted a hazard analysis using BRC Product Groups and Risk Assessment protocol to identify any potential biological, chemical (including allergens), and physical hazards. Potential hazards were identified, however, CPs as part of the pre-requisite programs are able to control all potential hazards, and therefore, no CCPs were identified.

Halal

Colony Products complies with the principles of Halal. Our products contain no meat or meat by-products, they contain no blood or blood by-products, and they are not processed using any meat or meat by-products. Our products do not contain intoxicants or alcohol.

Equipment and facilities used in the manufacture of our products is dedicated to this purpose and is not used to process any other products or any ingredients of animal or alcohol origin.

Heavy Metals

Oils supplied by Colony Products have been tested for heavy metals. Testing results for arsenic, cadmium, chromium, lead, and mercury (all in parts per million) have been analyzed by Inductively Coupled Plasma Atomic Emission Spectroscopy (PCM 517), with a detection limit of 1 ppm. None of the elements listed were detected.

Irradiation

Oils supplied by Colony Products are produced without using irradiation.

Label and Packaging Control

Label and packaging control procedures shall be in place to ensure all labels and packaging:

- meet applicable customer and 3rd party auditor requirements
- meet the laws and regulations of the country where the products are sold
- are kept up to date to ensure all obsolete labels and packaging materials are removed from all points of use and disposed promptly by authorized personnel
- only the latest labels and packaging materials are available for production
- are securely stored and released based on the production needs
- are food grade and comply with all regulations regarding food contact

Lot Code Explanation

Colony Products labels each product with a lot code which can be used to identify the product, month it was produced, and batch of production within that month.

Example: B-TRO-02-2017

B= Month of Production; where A=January, B=February, C=March etc.
TRO= Product; in this case would be Trough Grease, or M70=Mineral Oil 70
02= This was the second batch produced in February
2017=Year of production

Melamine

Oils supplied by Colony Products are at a low risk for Melamine contamination due to the nature of the product and manufacturing process. Colony Products does not expose its products to Melamine or perform any type of nitrogen that would compromise the integrity of the product.

Microbiological Statement

All fully refined vegetable oils manufactured by Colony Products Co., Inc have very low moisture, with typical moisture results at 0.05%. Due to the low moisture, our oils are considered very low risk for microorganisms. As a result, microbiological testing of our oils is only performed on a spot check basis. No ingredient used by Colony Products, or any of our finished products, are manufactured using a microbial treatment including Ethylene Oxide (ETO), and PPO. Nano, CMR, and toxicology are non-applicable. No kill step is required.

Mycotoxin

The refining, bleaching and deodorizing process destroys mycotoxins, including aflatoxins and vomitoxin, that might be naturally present in the oil products that you purchase from Colony Products. These results are confirmed by the monitoring and spot testing of oils by our raw material manufacturers/suppliers.

Natural Statement

The term “natural” may be used on labeling, provided:

- (1) the product does not contain any artificial flavor or flavoring, coloring ingredient, or chemical preservative (as defined in 21 CFR 101.22), or any other artificial, Paraben, Phthalates, or synthetic ingredient; and

- (2) the product and its ingredients are not more than minimally processed. Minimal processing may include: (a) those traditional processes used to make food edible or to preserve it or to make it safe for human consumption, e.g., smoking, roasting, freezing, drying, and fermenting, or (b) those physical processes which do not fundamentally alter the raw product and/or which only separate a whole, intact food into component parts.

Using these guidelines, Colony Products' Oils meet the standards to be considered a natural product. According to the majority of notifications provided by companies to ECHA in CLP notifications no hazards have been classified in accordance with REACH.

Nitrates

Colony Products' oils are not produced using nitrates.

Nitrosamines

Colony Products' oils do not contain nitrosamines and will not come in contact with nitrosamines during production, storage or transport.

Pesticides, Fungicides and Fumigants

Colony Products' oils are not produced using any pesticides, fungicides or fumigants. Colony Products monitors our suppliers and ingredients for pesticide residuals. To date, no detectable levels have been found. In the process of refining, bleaching and deodorizing vegetable oils, any pesticides, fungicides, fumigants that may have been present in the crude oil are removed at the deodorization step to non-detectable limits.

PHO Statement

As a manufacturer and distributor, we comply with all regulations of the FDA regarding PHO. Colony Products certifies that our vegetable oils, pan oils, trough greases, mineral oils and vinegars are non-PHO products, defined here as containing no partially hydrogenated oil, using no hydrogenation in the manufacturing process.

Proposition 65

Colony Products adheres to the rules and regulations of California Proposition 65 and will not knowingly discharge listed substances into drinking water sources, or onto land where the substances can pass into drinking water sources. We will also not knowingly expose individuals to listed substances without providing a clear and reasonable warning.

Radioactivity

Colony Products' oils are free from any radioactive substances where contamination presents a hazard because of the radioactive decay of the contaminants, which emit harmful ionizing radiation such as alpha particles or beta particles, gamma rays or neutrons. Irradiation is not used. We use potable drinking water that is also free from any irradiation contamination.

Receiving

Colony Products' policy is intended to identify the Quality Management System to be followed in this facility in order to ensure all incoming products, raw materials and food contact and non-food contact packaging materials meet the standards for safety, authenticity, legality or quality required by our customers, applicable laws, regulations, and 3rd party auditors.

QA Manager shall be responsible for overall receiving activities to ensure only compliant materials from approved suppliers are received into the facility and stored appropriately.

Rework

Rework shall not be performed.

Sanitation/Pest Control

Colony Products' procedure is intended to identify the Quality Management System to be followed in this facility in order to ensure safety, quality, legality and authenticity of products by maintaining products and their surrounding environment in sanitary conditions at all times.

QA Manager or a designee shall be responsible for conducting a documented risk assessment in order to determine appropriate policy and procedures to follow such as frequency of cleaning, areas to be cleaned, type of cleaner to use, and cleaning procedures to follow.

Pest Control is performed bi-weekly by a licensed third-party, Guarantee Pest Control.

Sewer Sludge

Colony Products' oils are produced without sewer sludge.

Shipping

This policy is intended to identify the requirements and procedures to be used in this facility in order to ship the finish products properly to comply with all applicable regulations and customer requirements.

President is responsible for training, implementation and monitoring of this procedure. All records pertaining to this procedure shall be maintained and kept on file as part of general record keeping practices.

Supply Chain Management

Products and services shall only be sourced through suppliers that have been evaluated to be acceptable through a rigorous qualification process including risk assessment to effectively reduce or prevent risks related to safety, legality, quality and authenticity. QA Manager shall be responsible for qualification/disqualification of suppliers.

Priority will be given to US Suppliers and any foreign material supplier/material will automatically be put into a medium to high-risk category and subject to the extra requirements listed in those categories.

Traceability and Recall

Colony Products' policy is intended to identify the requirements and procedures to be used in this facility in order to trace every raw material from receiving to shipping, and promptly recall raw materials, work-in-progress materials, and finished products from all stages of operation including delivery.

Corrective and Preventative Actions (using Corrective Action Monitoring Log) will be based on the information identified from customer complaints or by supervisor observation. The identified information will be used to make necessary corrections and prevent recurrence for a failure in the safety or quality of products and/or management system.

We conduct mock recalls with a four hour limit every six months to rigorously verify effectiveness and identify opportunities for enhancement. This commitment to continuous improvement ensures the highest standards of quality, reliability, and customer confidence.

Vegan

Colony Products' vegetable and mineral oils are considered vegan. They do not contain any animal products, nor has animal testing been used in the production or development of the products.

As an FDA (Food and Drug Administration) regulated facility, and in accordance with the FDA proposed rules and approved guidelines we have taken appropriate steps to minimize the risk of contamination of our products with Bovine Spongiform Encephalopathy (BSE), Transmissible Spongiform Encephalopathy (TSE) or Recombinant bovine somatotropin (rBST).

World Anti-Doping (WADA)

No products made or stored within our facility contain any of the products on the current WADA list.