SHANDONG TIANLI PHARMACEUTICAL CO., LTD.



South of Weigao Road and East of West Second Ring Road (Chenming Industrial Park), Shouguang City, Weifang City, Shandong Province, P.R.China

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Date: January 1, 2024

Food Fraud/Adulteration Management Procedure

Product Name:

Ascorbic Acid(100Mesh) Ascorbic Acid DC97%

Sodium Ascorbate Sodium Ascorbate DC99%

Calcium Ascorbate Calcium Ascorbate DC97%

L-Ascorbate-2-Phosphate(Vit C 35% Phosphate)

To whom it may concern,

1. Purpose

Establish procedures to minimize the risk of fraud or adulteration in the procurement process of raw and auxiliary materials and packaging materials, and ensure that the product description and commitment are legal, accurate and true.

2. Responsibility

- 2.1 The purchasing department is responsible for collecting and investigating the qualification of suppliers according to the requirements of purchasing management procedure.
- 2.2 The raw material warehouse is responsible for checking the material packaging and label information before warehousing according to the material acceptance requirements.
- 2.3 The central laboratory is responsible for sampling and testing according to the standard to identify the ingredients of materials.
- 2.4 QA department is responsible for collecting the information of adulteration of relevant materials and notifying the relevant departments, and assessing the risk of

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adulteration and counterfeiting of all raw and auxiliary materials and packaging materials. Supervise the whole process.

2.5 HACCP teams are responsible for assessing the vulnerability of raw materials adulteration and counterfeiting.

3. Content

- 3.1 Collection of adulteration information: Through the website of the State Food and drug administration, 315 complaint network and other channels to collect adulteration and fraud information, and timely inform the relevant departments. If the raw and auxiliary materials used by the company are involved, timely measures shall be taken.
- 3.2 In order to assess the risk of adulteration or counterfeiting of all raw and auxiliary materials, the following aspects should be considered:
 - 3.2.1 Is there any evidence of adulteration or falsification in the past.
 - 3.2.2 Economic benefits that may lead to adulteration or counterfeiting.
 - 3.2.3 Access to raw and auxiliary materials through the supply chain
 - 3.2.4 Identify the complexity of adulteration routine test
 - 3.2.5 Nature of raw materials
 - 3.2.6 For imported materials or suppliers that are difficult to control on-site audit, geographical location risk should be considered

3.3 Scoring criteria:

| Evaluation content | Degree and score | |
|---------------------------------------------------------------------|------------------|---------------|
| Is there any evidence of adulteration or falsification in the past. | Yes (2) | No (1) |
| Economic benefits that may lead to adulteration or counterfeiting. | Large (2) | Small (1) |
| Access to raw and auxiliary materials through the supply chain | Easy(2) | Difficult (1) |
| Identify the complexity of adulteration routine test | Complex (2) | Simple (1) |

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| Nature of raw ma | terials | Liquid | Powder | Solid | |
|------------------|---------|--------|--------|-------|--|
| | | (3) | (2) | (1) | |

The five aspects of raw and auxiliary materials and packaging materials were evaluated respectively, and the product of the scores of the five aspects was the adulteration risk degree of the material.

3.4 Risk assessment form

| Degree of risk of adulteration or forgery | Risk level | Classification of control measures |
|-------------------------------------------|------------|------------------------------------|
| 1~8 | Low | No special attention |
| 12~48 | High | Special attention |

- 3.5 According to the above criteria, all raw and auxiliary materials and packaging materials adulteration or fraud vulnerability assessment. The evaluation of raw materials should be reviewed according to the market situation and the collected information, and a formal evaluation should be conducted at least once a year.
- 3.6 The corresponding treatment measures should be formulated according to the assessed risk degree.
- 3.7 All raw and auxiliary materials and packaging materials shall be verified in terms of product name, supplier, manufacturer, production address and contact information before warehousing. In case of special management requirements such as non-GMO, kosher, halal, etc., effective supporting documents or commitment letters shall be continuously collected.
- 4. All raw and auxiliary materials from procurement, storage to distribution and use must be clearly recorded and traceable.

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