



Objective

The Cotton Culinary Hazard Analysis and Critical Control Points (HACCP) Plan is a comprehensive and integrated system designed to ensure food safety and mitigate the risk of foodborne illnesses. Our food products and services adhere to the highest compliance standards, including MIL-STD 3006, TB MED 530, and all applicable federal, state, and local regulations and industry guidelines. The Culinary team operates in full accordance with USDA and FDA Food Code requirements, as well as local, state, and federal regulations. To maintain the integrity of our food safety practices, the HACCP Plan and Quality Assurance Plan are reviewed and updated annually by the Quality Assurance Department to align with any updates to MIL-STD 3006, TB MED 530, USDA regulations, and FDA Food Code standards. This ongoing commitment to excellence involves collaboration across all levels of the culinary division, from employees to managers, and extends to our clients. All Standard Operating Procedures (SOPs) and HACCP documentation undergo an annual review to uphold the highest levels of compliance and food safety, ensuring alignment with national, state, and local municipal authorities. The Quality Assurance team also conducts a comprehensive evaluation of menu items, SOPs, food handling practices, training programs, and related processes to ensure consistent adherence to regulatory requirements and industry best practices.

The Quality Assurance team will adhere to the following practices:

1. Stay informed of updates to food safety regulations and advancements in food science related to food preparation, storage, and service.
2. Conduct annual reviews of the company's food service management plans, ensuring alignment with HACCP principles and current standards.
3. Establish and maintain effective verification procedures to ensure policies are implemented accurately and successfully.
4. Provide tailored recommendations to individual kitchens regarding procedural, policy, training, and operational improvements to enhance food safety management.
5. Define and monitor performance benchmarks for food safety management plans across individual food production units.
6. Conduct comprehensive reviews of all food safety documentation to ensure accuracy and compliance.
7. Perform regular audits of kitchens, kitchen trailers, food trucks, and facilities to assess adherence to food safety standards and best practices.
8. Ensure all kitchen facilities and culinary assets comply with local and state regulations by maintaining up-to-date permits and licenses.
9. Develop and deliver job-specific training programs for all employees to effectively implement the food safety management plan.
10. Amend the food safety management plan promptly in response to the following circumstances:
 - a. Introduction of new menu items
 - b. Removal of menu items
 - c. Changes to food products



- d. Modifications to storage or preparation procedures
 - e. Association of a food item with an illness
 - f. Significant changes in customers, suppliers, equipment, or facilities
 - g. Availability of new food safety information
 - h. Substantial personnel changes
11. Document all updates and amendments to the food safety management plan and report changes appropriately.
 12. Distribute updated food safety management plan documentation annually to all relevant locations and kitchens to ensure alignment with the latest practices and standards.

HACCP Development TEAM

- Johnny Slaughter – President of Cotton Logistics
- Travis Brice – Executive Vice President of Cotton Logistics
- Ciara Gerick – Director of Quality Assurance
- Amber Landry – Quality Assurance Manager- LCE
- Kraig Junck – Vice President of Culinary
- Jeff Inman – Director of Culinary Operations
- Jesse Casas– Executive Vice President HSE
- Wade Schindler – Executive Chef

Training

The Cotton Business Academy is an in-depth training program designed to equip all Culinary employees with the foundational knowledge and skills necessary for success. This program provides comprehensive instruction in Basic Food Safety, HACCP principles, Standard Operating Procedures (SOPs), company policies, and expectations. Additionally, the Academy fosters a supportive environment, offering guidance and feedback to help new staff acclimate to Cotton Culinary's commitment to a strong food safety culture. To further reinforce this foundation, all employees are required to complete a food safety certification course and exam through an ANSI-Accredited Program. This ensures employees meet industry standards and stay informed on best practices.

Steps for Training of New Staff Members

1. New employees fulfill all required paperwork and participate in initial training during the onboarding process.
2. Employees engage in the comprehensive training program to build a strong understanding of food safety principles and company procedures.
3. Employees complete an online food handler or manager certification course and obtain a valid certificate.
4. Managers guide new employees through the QA/QC Training Guide, tailoring the training to specific roles and responsibilities as applicable.



5. Managers submit the signed QA/QC Training Guide to the Quality Assurance department within two weeks of the employee's hire date.
6. Employees maintain their expertise in food safety by participating in weekly quizzes that focus on current topics and emerging trends in the industry.

Record Keeping

The Cotton LCE Quality Assurance Team maintains all records and documents electronically for a minimum of one year, ensuring they are accessible at any time. Project, job, and event records are monitored using a compliance log tracker to ensure thorough oversight. These records include, but are not limited to:

- Final cooking temperature logs
- Cold and hot holding temperature logs
- Receiving temperature logs
- Refrigerator and freezer temperature logs
- Warewashing logs
- Thermometer calibration logs
- Cleaning routines
- Personal hygiene logs
- Damage and discard logs

Purchasing

All food service purchasing is managed by kitchen/project managers, Divisional Directors, or the Executive Chef. Managers are responsible for maintaining inventory logs at their respective locations. Orders are based on current inventory levels and upcoming menu requirements. Food is procured exclusively from approved suppliers who source products from licensed and reputable purveyors and manufacturers that adhere to good manufacturing and sanitation practices.

Recalls

The Cotton Quality Assurance Team monitors daily recall announcements from the CDC, USDA, and FDA to ensure the safety of all food products. If a food item used in a Cotton Culinary Kitchen is subject to a recall, the following steps are initiated:

1. The recall is immediately communicated to all culinary staff.
2. The Director of Quality Assurance activates the Recall Procedure, which involves the removal of the affected product from production.
3. The product details are recorded on the Damage and Discard Log.

These actions are typically completed within one hour of receiving the recall announcement, ensuring a swift and efficient response to protect food safety.



Audits & Corrective Actions

In addition to inspections conducted by municipal, state, and federal health departments, the Cotton Quality Assurance Team performs internal audits at least quarterly. These audits involve comprehensive evaluations of cleanliness, food safety, equipment performance and maintenance, food handling practices, workplace safety, and other critical areas. If issues are identified during an audit, a Corrective Action Plan is developed and promptly executed. In cases where non-compliance results from a lack of training or understanding, affected individuals are retrained to ensure future compliance.



Objective

The Cotton Temporary Support Services (TSS) Quality Assurance Plan is a robust and integrated management system designed to ensure the delivery of reliable, safe, and efficient temporary support facilities and services. This plan reflects Cotton's unwavering commitment to excellence and continuous improvement across all TSS operations. The success of the TSS Quality Assurance Plan relies on the active participation of all stakeholders, including employees, managers, and clients. This collaborative approach ensures consistent adherence to the highest standards of service, sanitation, equipment performance, and regulatory compliance. To maintain these standards, all Standard Operating Procedures (SOPs) and Quality Assurance documentation will undergo a formal review at least annually. This process guarantees alignment with evolving industry best practices and compliance with national, state, and local regulations. The Quality Assurance team plays a critical role in overseeing and evaluating key operational components, including SOPs, employee training programs, equipment functionality, and regulatory compliance. Through systematic assessments and ongoing improvements, the team ensures that Cotton TSS consistently meets or exceeds client expectations. The TSS Quality Assurance Plan applies to all Cotton TSS operations, supporting a diverse range of industries, including Energy, Hospitality, Government, Infrastructure, Oil & Gas, Petrochemical, Special Events, and Emergency Response. By implementing this comprehensive quality assurance framework, Cotton TSS reaffirms its commitment to delivering superior temporary support solutions that clients can trust.

The Quality Assurance team will adhere to the following practices:

1. Conduct annual reviews of the TSS management plans to ensure alignment with regulatory mandates and industry standards.
2. Establish and validate effective verification procedures to ensure the proper implementation of policies and standards.
3. Provide recommendations to individual operations regarding procedural, policy, and training enhancements to support the successful implementation of quality and safety management systems.
4. Define and monitor performance benchmarks for quality and safety management systems across all temporary support services operations.
5. Conduct comprehensive reviews of all quality and safety management systems to ensure ongoing compliance and effectiveness.
6. Perform detailed audits that assess:
 - Equipment quality and performance
 - Thorough cleaning, housekeeping, and sanitation practices
 - Facility layout and operational efficiency
 - Project documentation for individual operations, company assets, and facilities
7. Develop and deliver job-specific training programs to equip all employees with the knowledge and skills required to implement and maintain safety management plans.
8. Amend the management plan as necessary in response to the following:
 - Introduction of new services
 - Discontinuation of temporary support services
 - Equipment modifications or upgrades



- Changes to mobilization or demobilization procedures
 - Significant changes in customers, suppliers, equipment, or facilities
 - Availability of new safety regulations or compliance requirements
 - Major personnel changes
9. Ensure all changes to quality and safety management systems are documented accurately and promptly.
10. Distribute updated copies of quality and safety management system changes to all relevant locations to ensure consistency and compliance across operations.

TSS QA Plan Development Team

- Johnny Slaughter – President of Cotton Logistics
- Travis Brice – Executive Vice President of Cotton Logistics
- Ciara Gerick – Director of Quality Assurance
- Amber Landry – Quality Assurance Manager- LCE
- Blake Hunt – Vice President of TSS
- Jesse Casas – Executive Vice President HSE

Training

The Cotton Business Academy serves as a comprehensive training program that all Temporary Support Services (TSS) employees must successfully complete upon hire. This program introduces new employees to the TSS Quality Assurance (QA) Plan, company expectations, policies, and procedures. It also provides essential support and feedback to help new staff seamlessly integrate into the Cotton TSS work environment. In addition to the Cotton Business Academy, employees will undergo job-specific certifications and training relevant to their roles. Steps for Successfully Training New Staff Members:

1. The new employee completes all required onboarding paperwork.
2. The new employee attends and completes the Cotton Business Academy program.
3. The new employee undergoes safety training required for operating specified machinery or equipment.
4. The Project Manager delivers role-specific training using the official Training Guide. (Items may be omitted if not applicable to the employee's role.)
5. The Project Manager submits a signed copy of the completed Training Guide to the Quality Assurance department within two weeks of the employee's hire date.

Record Keeping

The Cotton Quality Assurance team maintains all records and documentation in a secure electronic system for a minimum of one year to support day-to-day operations. These digital records are stored in project-specific folders, which are audited monthly by the Quality Assurance team to ensure accuracy, completeness, and compliance. TSS Division records include, but are not limited to, the following documents:

- Project Manager reports



- Cleaning logs
- Work authorization documents
- Change orders
- Final scopes of work
- Expense reports
- Client communication emails
- Permits
- Housekeeping inspection reports
- Production schedules
- Client purchase orders

Purchasing and Operations

All equipment purchases and rentals are authorized and managed by Project Managers, Assistant Project Managers, or Divisional Directors. A detailed Asset Tracker will be maintained to manage and monitor equipment functionality and availability across operations. Purchases will be made based on current project needs and the defined scope of work. Equipment will only be procured from approved suppliers who source products from licensed, reputable manufacturers adhering to good manufacturing practices. All vendors must successfully complete Cotton's Vendor Compliance Program before being onboarded. Site preparation will be overseen by Project Managers, Assistant Project Managers, or Divisional Directors. Employees operating machinery or equipment must possess the appropriate certifications or training required for safe operation. Additional operational needs, such as plumbing, electrical work, or similar services, must comply with local, state, and federal regulations and will only be provided by approved, licensed, and reputable vendors.

Audits & Corrective Actions

In addition to inspections conducted by local and state regulatory authorities, the Cotton Logistics Quality Assurance Team will perform internal audits throughout the project lifecycle. These audits involve thorough evaluations of equipment, services, and operational processes to ensure compliance with established standards. Audits include, but are not limited to workplace safety assessments, housekeeping efficiency evaluations, regulatory compliance checks, and cleanliness and sanitation inspections. Audit schedules will be determined based on the risk level associated with each service or project. If a nonconformance is identified during an audit, a Root Cause Analysis will be conducted, and a corrective action plan will be developed and implemented promptly. If the root cause of the nonconformance is attributed to insufficient training or a lack of understanding, the individuals involved will undergo retraining to ensure compliance moving forward.



Objective

The Cotton Environmental Support Services (ESS) Quality Assurance Plan is an integrated and comprehensive system designed to ensure the delivery of reliable, safe, and efficient environmental support services. The plan's success relies on the collective commitment of all stakeholders, including employees, managers, and clients within the ESS division. Cotton ESS brings together environmental professionals with decades of expertise in responding to oil and hazardous material spills, asbestos abatement, and uncontrolled release containment. Leveraging this experience, Cotton ESS is equipped to rapidly assess situations and develop effective mitigation plans. To maintain excellence, all Standard Operating Procedures (SOPs) and Quality Assurance Documentation are reviewed at least annually to ensure optimal service quality, equipment performance, and compliance with national, state, and local regulations. The Quality Assurance team conducts comprehensive evaluations of SOPs, training programs, equipment, assets, and regulatory compliance to uphold the highest standards. This quality assurance management system encompasses all Cotton ESS operations, including emergency response, asbestos abatement, tank cleaning, waste disposal, remediation projects, consulting services, and natural disaster recovery.

The Quality Assurance team will adhere to the following practices:

1. Conduct annual reviews of the company's Environmental Support Services (ESS) management plans to ensure alignment with regulatory authority mandates and evolving standards.
2. Establish and implement effective verification procedures to ensure accurate and comprehensive application of policies.
3. Provide tailored recommendations to individual operations regarding updates to procedures, policies, training, and activities to ensure the effective implementation of quality and safety management systems.
4. Define and monitor performance benchmarks for quality and safety management systems across all environmental support services.
5. Conduct thorough reviews of all quality and safety management systems to maintain compliance and operational excellence.
6. Perform detailed audits of equipment quality, facility layouts, environmental factors, and project documentation for individual operations, company assets, and facilities.
7. Develop and deliver role-specific training programs to equip employees with the knowledge and skills necessary to implement safety management plans effectively.
8. Ensure the company and its personnel comply with training and licensing requirements established by local and state regulatory authorities.
9. Update the management plan as needed in response to:
 - a. Introduction of new services
 - b. Removal of environmental services from operations
 - c. Changes to equipment
 - d. Adjustments in mobilization or demobilization procedures
 - e. Significant changes in customers, suppliers, equipment, or facilities
 - f. Availability of new safety regulation information



- g. Substantial personnel changes
- 10. Document all changes to the management plan and ensure they are appropriately reported.
- 11. Provide updated copies of quality and safety management system changes to all relevant locations to ensure alignment with current practices and standards.

ESS QA Plan Development Team

- Johnny Slaughter – President of Cotton Logistics
- Travis Brice – Executive Vice President of Cotton Logistics
- Ciara Gerick – Director of Quality Assurance
- Amber Landry – Quality Assurance Manager- LCE
- Ryan Miller – Compliance Manager
- Jesse Casas – Executive Vice President HSE

Training

The Cotton Business Academy is a comprehensive training program that all Environmental Support Services (ESS) employees are required to complete upon hiring. This program provides an in-depth review of the ESS Quality Assurance (QA) Plan, Standard Operating Procedures (SOPs), company expectations, policies, and procedures. In addition to equipping new employees with critical knowledge, the program offers support and feedback to help them integrate seamlessly into Cotton ESS's operational and cultural environment. Furthermore, all employees must complete certifications specific to their job titles to ensure compliance with industry standards and regulatory requirements.

Steps for Training New Staff Members

1. The new employee completes all required onboarding paperwork.
2. The new employee attends and completes the Cotton Business Academy program.
3. The new employee undergoes safety training required for operating specified machinery or equipment.
4. The Project Manager delivers role-specific training using the official Training Guide. (Items may be omitted if not applicable to the employee's role.)
5. The Project Manager submits a signed copy of the completed Training Guide to the Quality Assurance department within two weeks of the employee's hire date.

Personnel tasked with supporting the environmental aspects of a project or facility must have documented and demonstrated experience and/or education relevant to the specific environmental requirements of the project. This structured and comprehensive approach to onboarding and training ensures that all ESS employees are prepared to uphold Cotton ESS's commitment to safety, quality, and operational excellence. At a minimum, this may include:

- HAZWOPER Initial 40-Hour Certification



- Confined Space Entry Certification
- Spill Prevention and Control Training

Record Keeping

The Cotton Quality Assurance Team ensures that all records and documents are maintained electronically for a minimum of one year to support day-to-day operations, with access available at any time. The Environmental Support Services (ESS) Division maintains comprehensive records to ensure compliance, operational efficiency, and transparency. These records include, but are not limited to:

- Project Manager reports
- Work authorization documents
- Change orders
- Final scopes of work
- Expense reports
- Client correspondence, including emails
- Permits and inspections
- Production schedules
- Client purchase orders

On-Site Record Requirements

This robust record-keeping policy ensures the availability of critical documentation to support compliance with regulatory requirements, uphold quality standards, and provide a transparent record of operations. The following records must be maintained on-site and readily accessible for regulatory compliance and operational reference:

- a. Current licenses, training certifications, registrations, and accreditation certificates for all personnel
- b. Copies of all correspondence with regulatory agencies, including letters, notices, and citations.
- c. Waste disposal receipts and supporting documentation.
- d. Copies of sample analysis and laboratory reports.
- e. Specifications and contracts for awarded projects.
- f. Current "Physician's Written Statement" and respirator fit test documentation for applicable personnel.
- g. All documentation related to specific projects will be retained digitally for a minimum of 30 years following project completion.
- h. Records for employees performing environmental work will be retained for 30 years beyond their last date of employment.



Purchasing and Operations

All equipment purchasing and rentals are managed by Project Managers, Operations Managers, Asset Managers, or Divisional Directors. Project Managers are responsible for conducting and maintaining an Asset Tracker, which ensures effective management of operational assets and their performance. Equipment orders are based on current operational needs and the scope of work. Equipment is sourced exclusively from approved suppliers who procure products from licensed and reputable purveyors and manufacturers that adhere to stringent Good Manufacturing Practices (GMP). Site preparation is overseen by Project Managers, Operations Managers, or Divisional Directors, ensuring all necessary resources and equipment are in place before project initiation. Employees assigned to operate equipment must be certified or possess the necessary training to ensure safe and efficient operation. Additional operational needs, including plumbing, electrical, and other specialized services, will be sourced from reputable, approved, and licensed providers.

Audits & Corrective Actions

In addition to inspections conducted by local and state environmental authorities, the Cotton Quality Assurance Team performs internal audits throughout the project lifecycle. These audits are comprehensive inspections focused on equipment performance and maintenance, workplace safety, regulatory compliance, and cleanliness. The primary objective of these audits is to ensure that operational standards align with Cotton ESS quality expectations and comply with EPA, OSHA, and other relevant local and state regulatory requirements. If any discrepancies or issues are identified during the audit, a Corrective Action Plan is developed and implemented promptly. In cases where non-compliance is attributed to a lack of training or understanding, retraining is provided. The Project Manager is responsible for ensuring the corrective actions are executed without delay and that the issue is resolved effectively.



Objective

The Cotton Logistics, Culinary, and Environmental (LCE) Quality Assurance Plan is a comprehensive and integrated system designed to ensure the highest levels of quality, safety, and compliance across all operations. Cotton is committed to delivering reliable, optimized solutions tailored to meet the unique requirements of its clients, ranging from disaster relief catering to temporary support services (TSS) and environmental support services (ESS). The success of the LCE Turnkey Quality Assurance Plan depends on the collective commitment of employees, managers, and clients within the Culinary, TSS, and ESS divisions. To maintain excellence, all Standard Operating Procedures (SOPs) and Quality Assurance Plans will be reviewed annually to ensure the highest quality of service and strict adherence to national, state, and local regulations. The Quality Assurance team will routinely evaluate SOPs, asset compliance, food safety standards, environmental certifications, and related processes to ensure continuous improvement.

The Quality Assurance team will adhere to the following practices:

1. Conduct annual reviews of divisional management plans to ensure compliance with regulatory mandates.
2. Establish effective verification procedures to ensure the proper implementation of policies.
3. Provide operational recommendations for procedural, policy, and training improvements to enhance quality and safety management systems.
4. Define performance benchmarks for quality and safety management systems across all divisions.
5. Conduct comprehensive reviews of all quality and safety management systems.
6. Perform detailed audits of individual operations, company assets, and facilities.
7. Develop job-specific training programs to support the successful implementation of quality and safety management systems.
8. Amend management plans as needed in response to:
 - a. Introduction of new services
 - b. Removal of existing services
 - c. Equipment changes or modifications
 - d. Changes to mobilization or demobilization procedures
 - e. Significant changes in customers, suppliers, equipment, or facilities
 - f. New regulatory or safety information
 - g. Major personnel changes
9. Ensure all changes are thoroughly documented and recorded.
10. Distribute updated quality and safety management plans to relevant locations to ensure consistency.
11. Stay current with advancements in food safety regulations, environmental guidelines, and municipal, state, and federal government requirements.

Quality Assurance Development Team

- Johnny Slaughter – President of Cotton Logistics
- Travis Brice – Executive Vice President of Cotton Logistics
- Ciara Gerick – Director of Quality Assurance



- Amber Landry – Quality Assurance Manager- LCE
- Kraig Junck – Vice President of Culinary
- Blake Hunt – Vice President of TSS
- Jesse Casas – Executive Vice President HSE

Training

The Cotton Business Academy serves as a foundational training program that all Cotton LCE employees must complete during the onboarding process. The program introduces employees to the QA Plans, SOPs, company expectations, policies, and procedures across the TSS, Culinary, and Environmental divisions. Additionally, it provides guidance and feedback to ensure a smooth transition into the Cotton LCE work environment. All employees will also complete job-specific certifications and training relevant to their roles.

Steps for Successfully Training New Staff Members:

1. Complete all required onboarding paperwork.
2. Participate in and complete the Cotton Business Academy program.
3. Complete division-specific safety training (e.g., food handling certification, forklift operation, HAZWOPER, etc.).
4. Receive role-specific training delivered by the Project Manager using the official Training Guide (non-applicable items may be omitted).
5. Submit the completed and signed Training Guide to the Quality Assurance department within two weeks of the employee's hire date.

Record Keeping

The Quality Assurance team will maintain all records and documentation electronically for a minimum of one year to support day-to-day operations. Records will be stored securely in digital project folders and audited monthly to ensure accuracy and compliance.

The Culinary Division's records will include the final cooking temperature logs, cold and hot holding temperature logs, receiving temperature logs, refrigerator and freezer temperature logs, ware washing logs, thermometer calibration logs, cleaning routines, personal hygiene logs, and damage and discard records.

The TSS Division's records will include project managers' reports, work authorization documents, change orders, final scope, expense reports, emails with clients, permits, inspections, production schedules, and client purchase orders.

The ESS Division's records will include project managers' reports, work authorization documents, change orders, final scope, expense reports, emails with clients, permits, inspections, production schedules, and client purchase orders.



Purchasing and Operations

All equipment procurement and rentals will be managed by Project Managers, Assistant Project Managers, or Divisional Directors. Asset trackers will be maintained to monitor equipment availability, usage, and performance. Orders will be placed based on current project needs and the defined scope of work. Equipment and food will only be sourced from approved vendors who supply licensed, reputable products and adhere to good manufacturing practices. Vendors must successfully complete Cotton's Vendor Compliance Program prior to approval. Site preparation activities will be overseen by Project Managers, Assistant Project Managers, or Divisional Directors. Employees operating equipment must hold the required certifications or training for safe operation. Operational needs such as plumbing, electrical work, or other services will be performed by reputable, licensed, and approved providers in compliance with local, state, and federal regulations.

Audits & Corrective Actions

In addition to government-mandated inspections, the Cotton LCE Quality Assurance team will conduct internal audits at least quarterly. These audits will include thorough evaluations of equipment performance and maintenance, workplace safety, regulatory compliance, cleanliness and sanitation, housekeeping efficiency, food safety standards, and environmental concerns. If any nonconformances are identified during an audit, the team will conduct a Root Cause Analysis and implement a corrective action plan promptly. If the root cause is determined to be insufficient training or understanding, the affected individuals will receive immediate retraining to ensure future compliance.