**Zuul Tobacco Products**

**Product Composition Audit**

**Date:** October 22, 2025  
**Prepared by:** Product Quality and Regulatory Compliance Team

**Purpose**

This document provides evidence from an internal audit conducted by Zuul Tobacco Products to review the **tobacco composition and ingredient accuracy** of the company’s manufactured products.  
The purpose of the audit was to verify that all products contained tobacco content consistent with product labeling, formulation standards, and internal manufacturing specifications.

**Evidence Summary**

| **Audit Area** | **Evidence Description** |
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| **Audit Scope** | The audit covered all cigarette, cigar, and smokeless tobacco products manufactured between **January 1 and September 30, 2025**. Samples were drawn from production batches across three manufacturing facilities. |
| **Methodology** | The Product Quality Laboratory conducted quantitative analysis using gas chromatography and mass spectrometry to determine nicotine concentration and tobacco-leaf composition. Batch formulations were compared against declared ingredient lists and master product specifications. |
| **Ingredient Verification** | Laboratory analysis confirmed that the **majority of products matched the stated tobacco and additive composition** listed in official product documentation. Minor variances were detected in nicotine yield (±2%) in three product lines. |
| **Formulation Controls** | Production records showed consistent use of approved tobacco blends as defined by the company’s master formula library. Blending logs and raw-material intake reports were reviewed to confirm origin and ratio accuracy. |
| **Labeling and Documentation** | Product labels were compared with internal formulation sheets and ingredient disclosures submitted to regulatory authorities. No discrepancies were found between declared and actual ingredient composition. |
| **Quality Management Oversight** | All audit test results and batch verification documents were logged in the **Product Composition and Quality Management System (PCQMS)**. Traceability records confirm that all sampled products were cataloged and archived for review. |

**Supporting Documentation**

1. **Laboratory Analysis Reports** — Test data for nicotine concentration, moisture content, and additive verification.
2. **Batch Formulation Records** — Manufacturing logs detailing tobacco-blend ratios, flavoring additives, and lot tracking.
3. **Raw Material Intake Reports** — Supplier certificates of analysis verifying the origin and grade of tobacco leaf shipments.
4. **Labeling and Ingredient Disclosure Files** — Documentation submitted to regulatory agencies confirming accuracy of product labeling.
5. **PCQMS Audit Logs** — Evidence of audit trail entries, data integrity checks, and sample custody tracking.

**Observations**

* Product formulations were generally consistent with the company’s declared specifications.
* Minor variances in nicotine concentration were observed but remained within acceptable process control limits.
* Ingredient disclosure and labeling documentation were verified against laboratory results with no material inconsistencies identified.
* All supporting evidence was recorded and archived within the Product Composition and Quality Management System (PCQMS).

**Document Control**

| **Document ID** | **Version** | **Effective Date** | **Prepared By** | **Reviewed By** |
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| ZTP-PRD-AUD-EVD | 1.0 | October 22, 2025 | **Erin L. Vaughn**, Senior Quality Analyst | **Thomas R. Delaney**, Director of Regulatory Compliance |