Food Safety and Food Security Authorization Requirements

All food suppliers, including producers, manufacturers and distributors, must provide proof that they have a proactive food safety and food security program in place which meets or exceeds Sodexo Product Quality Assurance requirements. Food safety and food security programs should address each of the following technical topics:

- Regulatory Compliance
- Food Safety Programs (HACCP, GMP's, GAP’s, Training)
- Sanitation Programs (SSOP's)
- Building and Facilities
- Pest and Rodent Control
- Plant and personnel practices
- Receiving, Storage and Distribution
- Processing Standards
- Packaging and Labeling
- Food Security / Defense
- Recall, Withdrawal and Stock Recovery

Individual supplier authorization requirements will be based on the food product(s) risk level as evaluated by the Sodexo Product Quality Assurance. The table set forth in Exhibit 1 attached is designed to be a guideline to help determine the risk group and category of a supplier. Sodexo reserves the right of flexibility when determining risk levels.

One of the two options below must be fulfilled for each food supplier location. Option 1 is the preferred authorization method. Option 2 will require pre-approval from the Sodexo Product Quality Assurance Department.

**Option 1**
Food suppliers must undergo an audit or certification process by a Sodexo approved third party auditing firm (see Exhibit 2 attached for a list of a Sodexo approved third party auditing firms) with the frequency required by Sodexo Product Quality Assurance Department based on the risk level of the food products. The audit must cover the technical areas listed above as they may apply to the location being audited.

**Option 2**
Food suppliers must submit a detailed, documented food safety and food security plan or program to Sodexo Product Quality Assurance. Documented plans and programs should cover the technical areas listed above where and when applicable. This Option 2 will require pre-approval from the Sodexo Product Quality Assurance Department.

**Additional Requirements**
- Food suppliers will be required to meet or exceed Sodexo’s category specific Product Quality Assurance “Supplier Technical Requirements” (e.g. Fresh Produce, Ground Beef, Raw Meat and Poultry, Seafood, Dairy, Eggs...) as determined by the Supply Management and Product Quality Assurance Departments.
- Technical data sheets in Sodexo’s approved format for all food products upon request.

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Technical Topic Requirements

Regulatory Compliance

All food suppliers, including producers, manufacturers and distributors, must comply with all applicable Federal, State/Provincial, and/or local regulations including, but not limited to:

**United States:** Food Quality Protection Act 1996; Bioterrorism Preparedness and Response Act 2002; Consumer Protection and Allergen Labeling Act 2004; Food Safety Modernization Act 2011

**Canada:** Food and Drugs Act 1985; Consumer Packaging and Labeling Act 1985; Canada Agricultural Products Act 1985; Canadian Food Inspection Agency Act 1997

Food suppliers must have a good working knowledge of regulations that apply to their operation(s).

Food Safety Programs (HACCP, GMP’s, GAP’s, Training)

Food suppliers must demonstrate operation of a food safety management system based on HACCP (Hazard Analysis Critical Control Points) principles and supported by GMP’s (Good Manufacturing Practices) and/or GAP’s (Good Agricultural Practices) as appropriate. A food safety training program for employees must be in place.

Sanitation Programs (SSOP’s).

Food suppliers must have written protocols for the cleaning and sanitizing of all food-contact equipment based on SSOP’s (Standard Sanitation Operation Procedures) as appropriate. An effective system for monitoring the sanitation process must be in place in accordance with all applicable regulations.

Buildings and Facilities

Food suppliers’ buildings, facilities, grounds and equipment must be constructed and maintained in manner consistent with regulatory requirements to prevent the contamination of food or food packaging materials. A potable water supply must be available. An adequate waste storage and removal system must be maintained.

Pest and Rodent Control

Food suppliers must have a fully integrated written pest control program that prevents the potential or actual adulteration of foods or food packaging materials. Integrated Pest Management (IPM) systems are preferred.

Plant / Personnel Practices

Food suppliers must have adequate facilities to ensure that proper personal hygiene practices are maintained in accordance with all regulatory requirements. Such facilities include, but are not limited to: restrooms and hand washing facilities, personal storage and changing facilities and food consumption areas. A system for employee hygiene training must be in place.

Receiving, Storage and Distribution

Receiving, storage and distribution of raw ingredients, packaging and finished goods shall be under conditions that will protect food against physical, chemical, and microbial contamination or cross-contamination as well as against deterioration of the food and the container.

Processing Standards

Food suppliers must have processing standards in place to prevent the growth of dangerous microorganisms in foods according to all applicable regulations. There must be measures in place to prevent foreign materials from entering the food and systems to prevent cross-
contamination during processing and packaging. Adequate quality control methods should be used to ensure best practices.

Packaging and Labeling
All food products must be packaged and labeled according to all applicable regulations. Packaging must prevent contamination during shipping and storage. The label must clearly identify the product and ingredients. Applicable product code dates or lot numbers must be clear and legible on the cases and containers.

Food Security / Defense
Food suppliers must have an adequate food security / defense plan that addresses key elements including, but not limited to: management, human element, facility and operations. Food suppliers must comply with all applicable federal, state/provincial, and/or local regulations regarding food security.

Recall, Withdrawal and Stock Recovery Plan
Food suppliers must have a product recall policy and procedures. Operations management must be informed of recalls within one working day of receipt of the notification. Product recall systems should be tested annually and the results of the tests documented. Recalls should clearly communicate the requirements for prompt removal, withdrawal and stock recovery, and/or disposal, as well as any required communication to clients and guests.

Sodexo Policy References (PQA)
Group Policy: “Global Food Safety & Hygiene Policy”
CP 130: “Policy on Food Safety”
AF 807-01: “Vendor Authorization and Control”
AF 711-05: “Cash Management-Emergency Cash Paid Out Expenditures”
Individual supplier requirements will be based on the food product(s) risk level as evaluated by Sodexo Product Quality Assurance. Sodexo reserves the right of flexibility when determining risk levels.

<table>
<thead>
<tr>
<th>Risk Group</th>
<th>Category</th>
<th>Description</th>
<th>Examples</th>
<th>Audit / Program Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>High Risk</td>
<td>Potentially Hazardous Food, Requires Temperature</td>
<td>Meat, pork, poultry, fish/seafood, milk/dairy/cheese, eggs/egg products,</td>
<td>Audit or GFSI Certification – Expires in one (1) year</td>
</tr>
<tr>
<td></td>
<td>Food</td>
<td>Control</td>
<td>fresh produce, deli meat, nuts, peanut butter, spices, nutritional</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>supplements, specialty foods (Kosher, Halal, game), all food distributors</td>
<td></td>
</tr>
<tr>
<td>B</td>
<td>Medium Risk</td>
<td>May require temperature control; may require</td>
<td>Commercially processed and/or canned foods, frozen/refrigerated breads,</td>
<td>Audit or GFSI Certification – Expires in two (2) years</td>
</tr>
<tr>
<td></td>
<td>Food</td>
<td>additional processing or re-heating</td>
<td>processed fruits/vegetables, fruit juices, ready-to-eat pizza, refrigerated</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>desserts, pastas/rice, potato products, jams/jellies/toppings, flavorings</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>extracts, flour/milling, sauces/soups/gravies</td>
<td></td>
</tr>
<tr>
<td>C</td>
<td>Low Risk</td>
<td>May not require temperature control or additional</td>
<td>Non-hazardous foods, breads, bakery (bagels, doughnuts, cakes, cookies,</td>
<td>Audit or GFSI Certification – Expires in three (3) years</td>
</tr>
<tr>
<td></td>
<td>Food</td>
<td>processing (“Ready to Eat” or “Shelf-Stable”)</td>
<td>danish), tortillas/taco shells, etc.</td>
<td></td>
</tr>
<tr>
<td>D</td>
<td>Very Low</td>
<td>Commonly known brands, no potentially hazardous</td>
<td>Soft Drinks, chocolate/confections, sugar, baked/fried snack foods,</td>
<td>Documented food safety and security program</td>
</tr>
<tr>
<td></td>
<td>Risk</td>
<td>foods</td>
<td>coffee/tea, oils/shortenings, bottled water, c-store distributors</td>
<td>No expiration</td>
</tr>
<tr>
<td>E</td>
<td>Exempt</td>
<td></td>
<td>Breweries, distillers, wineries, CO₂, non-food items</td>
<td>No QA requirement</td>
</tr>
</tbody>
</table>
## Exhibit 2

<table>
<thead>
<tr>
<th>Auditing Agency / Accreditation</th>
<th>Standard Format</th>
<th>Acceptable Score</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>AIB International</strong>&lt;br&gt;Ms. Raven Roman&lt;br&gt;Ph: 785-537-4750 x. 124&lt;br&gt;<a href="mailto:rroman@aibonline.org">rroman@aibonline.org</a></td>
<td>- Food Safety Survey Report (processing, distribution, beverage, dairy, contract packer, agricultural crops, cut produce, packing houses and grain handling)&lt;br&gt;- Retail Food Establishments</td>
<td>850 or higher</td>
</tr>
<tr>
<td><strong>ASI Food Safety Consultants</strong>&lt;br&gt;Ms. Jeanette Huge&lt;br&gt;Ph: 314-333-6213&lt;br&gt;<a href="mailto:JHuge@asifood.com">JHuge@asifood.com</a></td>
<td>- Food Processor Audit&lt;br&gt;- Distribution Center Audit</td>
<td>85% or higher</td>
</tr>
<tr>
<td><strong>Global Food Safety Initiative (GFSI) Certification</strong>&lt;br&gt;* Contact your auditing company for details and accepted “schemes”.</td>
<td>- SQF – Safe Quality Food&lt;br&gt;- BRC – British Retail Consortium&lt;br&gt;- IFS – International Food Standard&lt;br&gt;- Global GAP (Aquaculture and Livestock)&lt;br&gt;- Global Red Meat Standard&lt;br&gt;- Global Aquaculture Alliance BAP&lt;br&gt;- FSSC 22000 (ISO)&lt;br&gt;- Canada GAP&lt;br&gt;- Primus GFS</td>
<td>Certification Document</td>
</tr>
<tr>
<td><strong>Noraxx Inspections Inc.</strong>&lt;br&gt;(Canadian)&lt;br&gt;Mr. Neil Buchmann&lt;br&gt;Ph: 905-502-8222&lt;br&gt;<a href="mailto:info@noraxx.ca">info@noraxx.ca</a></td>
<td>- Food Management System Audit (covering GMP, HACCP, Quality and Security)&lt;br&gt;- Retail Audit</td>
<td>85% or higher</td>
</tr>
<tr>
<td><strong>NSF Agriculture</strong>&lt;br&gt;Ms. Sonia Acuna-Rubio&lt;br&gt;Ph: 831- 760-0396&lt;br&gt;<a href="mailto:sacunarubio@nsf.org">sacunarubio@nsf.org</a></td>
<td>- Cooling Facility Audit&lt;br&gt;- Packing Facility Audit&lt;br&gt;- Fresh Cut Facility Audit</td>
<td>85% or higher</td>
</tr>
<tr>
<td><strong>NSF Guelph Food Technology Centre</strong>&lt;br&gt;(Canadian)&lt;br&gt;Ms. Lee-Ann Mason&lt;br&gt;Ph: 519-821-1246 x. 5056&lt;br&gt;<a href="mailto:lmason@gftc.ca">lmason@gftc.ca</a></td>
<td>- Good Manufacturing Practices Audit&lt;br&gt;- Good Distribution Centre Practices Audit</td>
<td>85% or higher</td>
</tr>
<tr>
<td><strong>NSF International</strong>&lt;br&gt;Ms. Christine Andrews&lt;br&gt;Ph: 540-738-0395&lt;br&gt;<a href="mailto:candrews@nsf.org">candrews@nsf.org</a></td>
<td>- Food Safety Supplier Audit (GMP)&lt;br&gt;- Food Safety Supplier Audit for High Risk (GMP)&lt;br&gt;- Distribution / Warehouse Audit Report&lt;br&gt;- Small Supplier Audit&lt;br&gt;- Retail Food Safety Audit</td>
<td>85% or higher with no criticals</td>
</tr>
<tr>
<td><strong>Primuslabs.com</strong>&lt;br&gt;Mr. Brian Mansfield&lt;br&gt;Ph: 805-922-0055&lt;br&gt;<a href="mailto:brian@primuslabs.com">brian@primuslabs.com</a></td>
<td>- Packinghouse, Processing Facility or Cooling/Cold Storage Audit</td>
<td>85% or higher</td>
</tr>
</tbody>
</table>
Randolph Associates, Inc.  
Ms. Barbara Jackman  
Ph: 205-595-6455 x. 229  
barbara.jackman@raiconsult.com

- Food Safety Systems & Sanitation Audit (for non-dairy facilities)  
- Food Safety Systems & Sanitation Audit (dairy facilities only)  
- Warehouse Food Safety Audit  
85% or higher

SAI Global  
Ms. April Moody  
Ph: 800-465-3717 X8692  
April.Moody@saiglobal.com

- Good Manufacturing Practices Audit  
- Distribution Center Audit  
85% or higher

SCS Global Services  
Ms. Heena Patel  
Ph: 510-452-8024  
hpatel@scscertified.com

- Processing Facility Practices Audit Checklist  
- Cooling & Cold Storage Practices Audit Checklist  
- Fresh Cut Facility Practices Audit Checklist  
- HACCP Practices Audit Checklist  
- Quality Program Audit Checklist  
- Food Security Assessment Checklist  
85% or higher

SGS North America Inc.  
Ms. Joan Coyne  
Ph: 201-508-3178  
Joan.coyne@sgs.com

- Food Processor Supplier Qualification Audit Checklist  
- Supplier Qualification Audit Checklist (Warehouse Transportation)  
- Produce Grower Packer Supplier Qualification Audit Checklist  
85% or higher

Silliker Laboratories  
Mr. Todd Dechter  
Ph: 312-938-5186  
todd.dechter@silliker.com

- Good Manufacturing Practices and Food Safety Systems Audit  
- Distribution Center Food Safety and Quality Systems  
85% or higher

Steritech  
Ms. Debbie Helms  
Ph: 704-749-7615  
Debbie.helms@steritech.com

- Retail Audit  
85% or higher

USDC – Seafood  
Steven Wilson,  
Ph: 301-713-2355  
Steven.Wilson@noaa.gov

- Seafood Inspection Program USDC Checklist & Score Sheet  
87.5% or higher

The Sodexo approved USDA audit agency below is not approved for retail food establishments or FSIS (USDA) regulated facilities due to the potential for conflict of interest.

USDA – Fruit and Vegetables (Fresh and Processed)  
Mr. Ken Petersen or  
Ms. Donna Burke-Fonda  
Ph: 202.720.5021  
FVAudits@ams.usda.gov

- Plant Systems Audit, Checklist and Score Sheet for Processors (canning, drying, freezing, and minimally processed facilities)  
- GAP / GHP Systems Audit Checklist and Score Sheet (Fresh Produce)  
- Produce GAPs Harmonized Audit - Field Operations and Harvesting; Post Harvest (Fresh Produce)  
87.5% or higher

USDA – Shell Egg  
Mr. Jeffrey Waite  
Ph: 202-720-4411  
Jeffrey.Waite@ams.usda.gov

- Shell Egg Plant Audit Assessment Worksheet (PSA & Food Defense)  
85% or higher