EXCLUSIVE BRAND

SUPPLIER & CO-PACKER

Food Safety & Quality Systems Manual

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Dear EB Supplier:

“Leading Food Safety” is a foundational building block at US Foods and key to that foundation are the products that we deliver to our customers. Our mutual food safety and quality goals are to ensure we are employing best practices consistently across the supply chain.

The updates in this 2018 version of the US Foods Food Safety and Quality Supplier Manual reflect the impact of the Food Safety Modernization Act as well as other critical food safety, quality and transparency requirements ranging from code dating to Animal Welfare standards to microbiological environmental testing to expanded supplier requirements for beef and veal Food Safety Systems.

Moreover, as staunch supporters and early adopters of GFSI (Global Food Safety Initiative), this manual has been completely reformatted to follow a GFSI format that will make it easier for our vendors, existing and new, to navigate against their chosen GFSI scheme.

Your continued support and collaboration on our Food Safety/Quality journey is appreciated.

Thank you,

Andrew Iacobucci
Chief Merchandising Officer, Chairman/Executive

1. Introduction

The content of this manual reflects the general requirements for developing and enhancing the food safety and quality systems of companies that supply raw food materials, food ingredients and manufactured Exclusive Brand (EB) products on behalf of US Foods (USF). Satisfactory compliance with the necessary components of this manual will be determined by the Food Safety and Quality Assurance department through audits, documentation and/or manufacturing system reviews. Approval to supply USF or any of its USF' branded products will be based on reviews and evaluations performed by the USF Food Safety & Quality Department or their designees.

In this manual, a supplier of raw materials, broker, importer, agent, co-packer, or a manufacturer of USF branded products will be referred to as a "supplier." USF' branded products will be referred to as Exclusive Brands or "EB."

Many of the items in this manual are based on regulatory requirements or industry best practices and are meant to supplement any regulatory and/or GFSI requirements. USF reserves the right to make modifications to this manual as often as necessary. This manual does not eliminate a supplier's responsibility to comply with all applicable federal, state, and local regulations and contract obligations.

Brokers, importers, and agents must verify that requirements in this manual are properly implemented at facilities that are contracted to produce/package EB products. Domestic and International facilities must meet appropriate US regulatory requirements. Documentation must be provided into the USF' designated data management system as described later in this manual.

Suppliers who supply imported products must comply with U.S. import regulations and provide support for the timely and accurate customs clearance of products imported by or on behalf of USF. The supplier will act as the FSVP (Foreign Supplier Verification Program) importer of record.

USF is fully committed to the safety, quality, regulatory compliance, and economic integrity of its products. Any supplier proven to be in contradiction may be removed as a supplier to USF.

2. Steps to becoming an approved Exclusive Brand (EB) Supplier for USF

Facilities seeking approval to produce USF branded products must be approved by USF' Food Safety and Quality Assurance (FSQA) Department. If production of a product is to be moved to another location or to a co-manufacturer location, that new site must be approved prior to running any production.

1. Supplier's facility and line must hold a current certification from one of the GFSI schemes (BRC, SQF, FSSC22000, IFS Food, etc.).
2. Each supplier's facility will be required to complete the *USF'* Desk Risk Assessment. It is the responsibility of the supplier to disclose all safety and quality information that is relevant to our EB items. This document will be reviewed by our FSQA team to assess compliance with the requirements outlined in this manual.
3. Based on the information in the FSQA Desk Risk Assessment, GFSI report & corrective action and the sensitivity of the product being manufactured, a representative from USF Food Safety & Quality Department or a designated third party may perform an onsite review of quality, food safety and regulatory compliance.

Once all information is reviewed by USF Food Safety & Quality Department, the facility will either be approved or not approved as an EB supplier.

3. Criteria for Approved Suppliers

3.1. REGULATORY

All approved facilities that produce, store or distribute EB products must meet all applicable US Regulations as appropriate.

All facilities that produce EB products must comply with the additional food safety and quality requirements outlined in this manual.

3.2. GLOBAL FOOD SAFETY INITIATIVE (GFSI)

All facilities that produce EB food products must be certified to one of the internationally recognized GFSI schemes prior to being approved as a supplier. (This does not include the intermediate or basic certifications.)

Approved suppliers must maintain GFSI certification and post unabridged copies of all certificates of completion, full audit reports and corrective actions for each approved production facility into the USF designated data management system prior to the previous certification's expiration date. Audit reports, certificates and corrective actions must be retained for two years past the product's expiration date and be posted in our data management system.

A facility failing to post the FSQA Desk Risk Assessment, their certifications, the latest, unabridged audit reports, and corrective actions within 30 days of the previous certification's expiration date, may, at the discretion of USF Food Safety & Quality Department, be placed on Restricted Status (no new business or supply new Distribution Centers) or Suspended Status (no product accepted from affected facilities).

All 3rd party warehouses where USF EB products are stored must be identified to USF Food Safety & Quality Department and audited by the supplier once per year under a GMP and HACCP based 3rd party audit or GFSI Certification. Audit documentation must be posted to the FSQ Data Management System.

3.3. FSQA DATA MANAGEMENT SYSTEM

In an effort to meet our customers' demand for product information we require our suppliers to provide information in formats and systems that will allow us to capture it accurately and transmit it to our customers.

USF designated data management system is an online network for managing Risk, Compliance and Standards. The network allows for secure storage, sharing and management of documentation, information and communications.

All EB Suppliers must register with USF designated data management system and keep all required documentation on the site.

- Site must be updated each time a new manufacturing facility is added and must be renewed annually.
- USF designated data management system registration and renewal fees are the responsibility of the supplier.
- Suppliers are responsible for ensuring that current and valid documents are submitted and shared and ensure their account is current at all times. (Current audit reports, emergency contacts, process flow diagram, risk/control document, etc.)

- The following information must be posted in the data management system and be 100% compliant before launch of new products:
    - Company contact list for emergencies (24/7/365 contact)
    - GFSI Audit report, certificate, and final corrective actions report
    - Process flow diagram for each product type, including identified CCPs and Preventive Controls
    - Risk/control document
    - Claim certifications (kosher, halal, non-GMO, etc.)
    - Completion of USF Specification template
    - Other information as requested by FSQA

3.4. FACILITY ASSESSMENT

On-site visits by a USF Food Safety & Quality representative may be conducted to assess food safety and quality systems.

It is USF' policy to give reasonable notice to the supplier of intent to conduct a visit but EB suppliers must grant USF access during production hours even without prior notice.

Per the vendor agreement, USF must be authorized to enter any establishment storing, supplying or co-packing products, packaging materials or ingredients for USF during production hours. The visit may include review of records, processes and facilities which demonstrate that EB products produced for USF meet specifications and remain consistent with the process flow chart.

EB product evaluations may be conducted on site with supplier participation.

- It is preferred that multiple EB products (or multiple lots if supplier produces a single SKU) be pulled from live production.
- If EB products are not being produced during the visit, it is permissible to pull EB products from storage for evaluation purposes.

3.5. PACKAGING GRAPHICS

All USF EB products must be placed in packaging and cases as defined by the USF packaging standards. All packaging to be used for USF EB products must be approved by the USF Packaging Science Department

3.6. PACKAGING ARTWORK SYSTEM

USF Packaging Artwork System is an online system for graphic arts development and approval.

This system captures core information regarding USF EB products that are currently classified as "New Projects." These new projects include new item requests, new packaging requests, re-branding projects/label conversions, etc.

The primary use of the system is to gather information such as ingredient statements, nutrition facts, product names, and case pack information from the FSAQ Data Management System to develop artwork for packaging.

Required participants include all USF EB Suppliers adding new items, developing new packaging and maintenance of current product labels.

Suppliers are not permitted to create their own packaging artwork or make changes to existing artwork without prior approval from USF Food Safety & Quality Department.

3.7. NEW PRODUCT APPROVAL

Approval of product by USF:

- Requires submission of bench samples as deemed necessary in order to formulate and/or evaluate product.
- May require the facility to conduct an in plant trial or “scale up” runs that may include product ‘ship testing’.
    - The facility must be prepared and equipped to conduct all plant trials and testing to verify that product formulation and manufacturing processes are capable of producing safe and quality products consistently (e.g. cook/chill, microbiological testing, label claims, risk of allergens, suitability of packaging and etc.). Plant trials must be performed with a representative volume on actual equipment that will ultimately be used to produce the product.
    - Plant trial product must be packaged using final specification packaging and run on actual packaging equipment. Where final printed packaging is not available, representative print or unprinted packaging may be substituted at the discretion of USF Packaging Science.
    - Adequate raw materials with at least 50% shelf life remaining, equipment, personnel and scheduling must be allocated to successfully complete these trials.
    - The facility must maintain production records and all relevant documentation related to these trials. This documentation must be provided to USF upon request.
    - Records must be maintained for at least one year past the product’s shelf life or as required by applicable regulations, whichever is longer.

The facility must ship representative product to USF for evaluation and approval for both plant trial and first production runs of product.

All new products will be subject to an increased frequency of quality monitoring by USF. If product is found to be out of compliance with product and/or packaging specification, USF may, including without limitation, request additional samples, reject the lot code, product or supplier restriction or suspension, and/or require participation in an ongoing product monitoring program at the supplier's cost.

3.8. PRODUCT QUALITY MONITORING PROGRAM

This mandatory, risk-based, customer-focused program is designed to ensure that our products consistently meet our specifications and allows USF to deliver on our brand promise.

- EB products from each category are selected and evaluated against product specifications by the USF Food Safety & Quality Department.
- The frequency of product evaluations will be determined based on USF’ internal product/supplier risk profile.
- Products will be sampled from distribution centers, customer or supplier locations in order to assess product quality in the field against the written specification.

- These evaluations may be performed by USF or USF' designated 3rd party at a USF location or off-site.
- Results from quality evaluations will be shared with the supplier and any non-compliance noted will be addressed on an individual basis.
    - USF may require corrective actions, additional testing, or take action on product in the market that does not meet our specification.
    - Products that do not meet specification will be considered to be non-compliant. In the event of noncompliance, USF may require suppliers to undergo 3rd party testing or limit EB supplier business opportunities.
    - In certain cases of product failure, suppliers may be required to participate in a product quality evaluation program executed by an independent third party on behalf of USF. Suppliers will be responsible for all costs associated with this program.
- Suppliers will be billed back for products that are sampled and evaluated by this program. We recognize there is a cost associated with this program and will do our best to prevent passing unnecessary costs to our suppliers.

3.9. SUPPLIER SCORECARD

USF defines certain food safety and quality metrics that are used to measure supplier compliance and performance. The goal is to have or create an overall quality and food safety compliance rating for the suppliers. This tool assists in assessing an EB supplier's eligibility for future business.

The Supplier Scorecard is shared with suppliers on a quarterly basis, comparing their performance to the best, worst and average in their category. Corrective actions are required for any failures.

The Supplier Scorecard criteria is subject to change at the discretion of the USF Food Safety & Quality Department in order to drive continuous improvement. A rating is assigned for every EB supplier based on points earned for compliance with certain criteria. These criteria may include, but are not limited to: product quality evaluations, supplier response time, complaints, recalls, data management system compliance, specification compliance and GFSI.

4. Food Safety & Quality Requirements

A documented food safety & quality management system must be in place to ensure products are manufactured under the appropriate regulatory, GFSI audit scheme and US Food's requirements. Documents must be made available to USF Food Safety & Quality Department upon request.

4.1. MANAGEMENT COMMITMENT

Suppliers must have policies in place that define the organizational structure and outline responsibility and reporting.

- Responsibility for food safety and quality must be expected at every level of the organization.
- Organizational responsibility for and commitment to management of food safety programs, regulatory compliance, and quality systems must be defined and documented.
- An organizational chart of plant management, quality, food safety and operations must be posted in USF designated data management system and updated when changes are made.

4.2. FOOD SAFETY PLAN

Suppliers must have a documented, verified and validated food safety plan in place for each type of EB product/process. The plan must meet all federal, state and local regulatory requirements including the following areas:

- Hazard analysis
  - Biological- pathogen outgrowth and cross contamination
  - Chemical- allergen cross contact and contamination
  - Physical- wood, nails, clear plastic, etc.
- CCPs and or Preventive controls
- Procedures for:
  - Monitoring the plan
  - Corrective Action
  - Verification program
  - Validation program
  - Training personnel in development, application and execution of the plan

4.3. FOOD SAFETY AND QUALITY MANAGEMENT SYSTEM

4.3.1. Procurement Controls

USF suppliers must have controls in place to ensure that raw materials, products and facilities adhere to specifications, all applicable laws, regulations and industry standards. Program must be made available for review by USF upon request.

Programs and controls must be in place to assess, approve and manage the suppliers of raw materials and food contact packaging. Suppliers must only source raw materials and food contact packaging from suppliers they have approve by the supplier.

Key aspects of the programs must include:

- SUPPLIER MANAGEMENT
  - Defined food safety and quality criteria that are used to select and approve suppliers.
  - Verification activities for food safety and quality of suppliers on an ongoing basis.
  - At a minimum, a valid 3rd party food safety and quality audit certification to a recognized audit standard must be required.
  - GFSI Certification is required
- RAW MATERIAL MANAGEMENT
  - Written specifications must be developed and available for all raw materials and direct contact packaging purchased and used for USF EB products. A risk assessment of all raw materials must be completed as part of the supplier's food safety plan prior to producing product for USF.
  - Certificates of Analysis (CoA's), as applicable for sensitive raw materials and Letters of Continuing Guarantee must be kept on file from all suppliers for all items purchased and must be made available to USF upon request for review.

- Specification monitoring program in place for food safety and quality of raw materials on an ongoing basis.

4.3.2. Ensuring Product Quality and Consistency

If product is produced by the supplier on multiple lines or at multiple facilities, a centralized evaluation program must be in place to ensure products consistently meets, product integrity, process and specification requirements:

- Product must be reviewed quarterly at minimum or at a frequency that demonstrates consistency to specifications.
- Documents must be made available to USF upon request.

Importers and brokers must review products from the facilities with whom they contract to ensure products are consistent.

4.3.3. Packaging Supplier Management

All USF EB products will be packaged in such a way that the product is protected throughout its lifecycle. All packaging to be used for USF EB Products must be approved by the USF Packaging Science Department. For a complete list of US. Foods preferred packaging vendors, contact US Food Packaging Science. A risk assessment must be used to determine method of supplier approval and monitoring.

- An effective packaging vendor control system must be in place for all packaging. All packaging vendors that are not USF approved must be risk assessed, based on:
    - Functionality
    - Contact with Food
    - Volume of product supplied
    - Supplier history
- The packaging vendor risk assessments must be reviewed on an annual basis.
- Where sites (or sister companies) manufacture their own food contact packaging (e.g. cans, blown bottles etc.), these operations must be treated as external vendors.
- All vendors must be approved. Details of vendor and the packaging supplied will be kept on an approved supplier list.

4.3.4. Product Specifications

USF requires a completed and approved specification in the USF designated data management system for every EB item produced at each facility. It is the responsibility of the supplier to ensure the accuracy and completeness of the specification.

- PROCESS

  The USF specification template must be used. Specifications on supplier letterhead are not accepted by USF.

  Where a product claim (e.g. Kosher, Gluten Free, 150% Vitamin C, etc.) is made on the product specification, scientific data and/or a certificate must be submitted in the USF designated data management system to substantiate the claim. The supplier must provide a 3rd party verification or audit (inspection, laboratory results, etc.) as required.

Where suppliers transfer information from the USF designated data management system-based specification to an internal document, systems must be in place to ensure accuracy of the information and ensure updates are made when applicable. Access to all USF product specifications must be limited to authorize personnel only.

- DEVELOPMENT & CONTENT

Each section (nutritional, ingredient, claims, net weight, etc.) of the specification must be verified against proposed product labels, packaging and internal specifications prior to product launch.

Key product indicators used to ensure product quality and consistency must be developed on process capability and listed within the specification. These may include, but not limited to the following:

- Size (Length, Width, Weight, etc.) (include upper and lower limits)
- pH
- Color
- Flavor
- Texture
- Acceptable Quality Limits, etc.
- Chemical attributes
- Physical attributes
- Microbiological attributes

Specifications must be developed to include measureable physical and sensory attributes to allow proper testing and monitoring of quality and consistency.

Production equipment settings when producing EB Products must be part of the specification. Suppliers must have controls in place to ensure that products are meeting all aspects of the specification at all times.

Suppliers must be responsible for verifying that co-packed product meets USF finished product specifications.

A specification must be in place prior to plant trial and reviewed by the USF Food Safety & Quality and PD Departments. A final specification must be in place at first production. The final specification will be approved by USF Food Safety & Quality Department only after successful first production.

- MAINTENANCE

Additional technical information must be made available to the USF Food Safety & Quality Department upon request.

All updated specifications supersede previous specifications.

Proposed changes must be discussed and approved by your USF Food Safety & Quality contact.

- Changes to the location of the manufacturing, process used in the manufacturing, ingredient, packaging, label, product or specification cannot be made unless authorized by USF Food Safety & Quality Department.
- Changing of the product without prior authorization of USF Food Safety

& Quality Department may result supplier suspension.

- Changes in formulation must be adequately assessed for legal and food safety issues, documented, and communicated to USF Food Safety & Quality Department for pre-approval with a minimum of three month notice. If extenuating circumstances necessitate an expedited timeline, shortened timing must be documented and approved by USF Food Safety & Quality Department.
- Approved changes will be communicated in writing from USF Food Safety & Quality Department

4.3.5. Packaging specifications

Suppliers must provide material specifications and packaging vendor details for all packaging components. Suppliers should utilize US. Foods preferred packaging material vendors to the greatest extent possible. For a complete list of US. Foods preferred packaging vendors, contact US Food Packaging Science. Any deviation from this must be approved by the US. Foods Packaging Science Department. Once the packaging is approved by USF, no changes can be made prior to production.

Changes to packaging specifications, packaging equipment, vendors and/or printers must be approved by US Food Packaging Science team. Samples, material specification, test data and 3rd party testing may be required for approval.

Suppliers will provide die lines (drawings and working CAD files) for all printed packaging components.

All primary, secondary and tertiary packaging must be provided with an appropriate amount of headspace. Inadequate or excessive headspace will not be accepted.

All packaging must incorporate a minimum of one level of a tamper evident feature so the end customer can identify if the package was previously opened. If the item, as determined by USF, will be sold as an individual inner package, that inner package must incorporate the tamper evident feature.

The use of staples or metal fasteners must be approved by US. Foods Packaging Science.

All primary food packaging should be hermetically sealed. Exceptions must be approved by US. Foods Packaging Science. No exceptions will be granted for non-produce RTE (Ready to eat) products.

The strength of all corrugated cases must be, at a minimum, sufficient to support the weight of a full pallet of product under the shipping and storage conditions defined in the product specification.

All corrugated packaging must be marked with the box manufacturer's certification. The corrugated materials used must be recyclable and be produced using a minimum of 35% post-consumer recycled content. This is verified via supplier signed letter of certification on supplier letterhead.

All products must be supplied with a pallet pattern that provides a minimum of 90% pallet utilization. USF will not accept product on broken pallets. Wooden pallets must be fully in tact with no broken deck boards, stringers, stringer boards or blocks. All boards, stringers and blocks must be present and there can be no nails, staples or other fasteners protruding from any part of the pallet construction. Likewise, plastic pallets must also be fully in tact with no cracks, breaks or missing sections.

Product must not overhang the edge of the pallet.

Any exceptions to these requirements must be preapproved by the USF Packaging Science Department.

If a product is part of the USF *Serve Good* product line, there will be additional requirements on the packaging materials.

4.3.6. Product Hold and Release

A written product hold and release program is required to manage non-conforming product. Controls must be in place to ensure that non-conforming product does not inadvertently get shipped to USF. Components of this program must include, but not be limited to:

- Written procedures for managing non-conforming products.
- Identification of plant and corporate personnel with decision making responsibility for releasing product from hold.
- Documenting and monitoring all products on hold to ensure timely and effective disposition.
- A defined method for segregating product on hold.
- Inventory checks must be conducted at predetermined frequencies.
- If EB products are found to be nonconforming, USF Food Safety & Quality Department must be contacted prior to any product being shipped. If product nonconforming product is mistakenly shipped, immediately contact USF at recallteam@usfoods.com.
- If a regulatory hold is applied to a USF labeled product for any reason, USF Food Safety & Quality Department must be notified immediately. Product status and corrective action must be provided.

4.3.7. Product & Packaging Disposition for Non-conforming Product

Thrifting, donating, or selling EB product to a non-USF entity without written authorization is strictly prohibited. Product and branded packaging must be denatured or destroyed prior to disposal. A program must be in place to ensure USF labeling is removed from non-conforming product prior to leaving the supplier's control. USF may request documentation of label removal from all affected product.

All obsolete or rejected branded packaging must be securely disposed of and evidence of proper disposal provided to US-Foods.

4.3.8. Inventory Control Program

Suppliers must have controls in place to ensure proper product rotation.

- All USF EB products must be stored and shipped following FIFO (First in First Out) product rotation to ensure that older products are used or shipped prior to newer products.
- Ensure proper product rotation so that only product with sufficient shelf life remaining is shipped to USF distribution centers.

4.3.9. Product Traceability

The supplier must maintain policies and controls must be in place to permit traceability of all raw materials, components, product contact packaging, work in process and rework to the finished product lot.

Procedures must be in place to trace a batch of raw materials or packaging delivered, for all products it has been used in.

Suppliers must have controls in place to facilitate the tracking of product code date(s) to the customer and to ensure proper rotation so that only product within USF' specified shelf life policy is shipped.

Records of production must be maintained for at least one year past the product's shelf life or as required by applicable regulations, whichever is longer.

The facility must have a traceability program in place and, upon request from USF, may be asked to execute a traceability exercise.

4.3.10. Code Dating Requirements for Inner and Outer Packaging

Finished products must be traceable by individual lot number or other identifying code, one step back and one step forward in the supply chain.

The use of encrypted codes as the only source of coding is not permitted by USF**.**

Code dating formats must not be altered without approval and notification of USF Food Safety & Quality Department

- INNER PACKAGING
  - A production code date be applied to the inner packaging that will identify the date on which the product was packaged, manufactured or a date preceded by a qualifier (e.g. "Date of Expiration," "Expires on").
  - The preferred methods of code dating are:
    - a calendar date with year (MMDDYY)
    - a three-digit Julian date preceded by the year (in the format YDDD or YYDDD)
    - a "Best By" or "Use By" date
- OUTER PACKAGING
  - Code dating on the outer packaging must be consistent to code dating used on receiving and production records, certificates of analyses, invoices, and bills of lading, and etc... Omitting sections of the code dating for convenience is not acceptable.
  - A production code date must be applied to the outer packaging that will identify the date on which the product was packaged, manufactured or a date proceeded by a qualifier (e.g. "Date of Expiration," "Expires On,").
  - The preferred methods of code dating are as follows:
    - Calendar date with year (MMDDYY)

- Three-digit Julian date preceded by the year (in the format YDDD or YYDDD)
- "Best By" or "Use By" date

Records must be maintained for at least one year past the product's shelf life or as required by applicable regulations, whichever is longer.

4.3.11. Customer Complaints

USF Food Safety & Quality Department has a formal system in place to document, track and communicate/follow up on customer complaints with suppliers. It is critical that all complaints are followed up through the on-line complaint management system so they can be properly managed, tracked and trended

- All suppliers must have a documented product complaint program which includes a system to collect, track, and trend customer complaints.
- Suppliers must acknowledge receipt of all EB product complaints and begin investigation within 24 hours.
- A full investigation and corrective action report may be required prior to producing additional EB product.
- Upon resolution, suppliers must submit corrective actions and resolutions through USF on-line complaint management system for USF Food Safety & Quality Department to review.
- In some cases, crediting the customer or distribution center may be necessary, but credit alone is not an adequate response to the complaint. Any credits by USF will be passed through to the supplier.
- Suppliers must not contact the distribution center or customers directly with the complaint or complaint resolution. All correspondence must go through USF on-line complaint system.
- If a complaint is received directly by the supplier, USF Food Safety & Quality Department must be notified in writing as to the nature of the complaint so the complaint can be entered properly into the system
- Suppliers MUST NOT contact distribution centers or customers directly.

4.3.12. Crisis Management

A system must be in place to manage situations involving food safety, regulatory issues, natural disasters, or public relations issues.

- Roles and responsibilities must be well defined and documented.
- USF Food Safety & Quality Department contact person must be notified of any potential regulatory action or quality/safety risks to USF branded product. If USF Food Safety & Quality contact is cannot be reached, email recallteam@usfoods.com.

4.3.13. Product Recovery and Recalls

Each facility must have a formal recall plan and product recovery program in place. This plan must include the correct USF contact information, meet applicable regulatory requirements, and be formally reviewed (with meeting minutes recorded) at a minimum of once per year.

The plan must include, at minimum, procedures and responsibilities to execute the following tasks:

- Initiation of product recall or withdrawal.
- How and when to report the incident to USF.
- Logistics planning for how product will actually be recalled or withdrawn from distribution and end suppliers' customers.
- A method to maintain traceability in production, storage and distribution during recall or withdrawal.
- Reconciliation of product and verification of successful recovery against production records.
- A current contact list for all internal contacts involved in the facility's product recovery program must be maintained as current and posted in USF' designated data management system. At least one contact and phone number must be provided for after business hours.
- The USF Corporate Regulatory Team must be notified of all recalls/holds/withdrawals involving USF products. The USF Corporate Recall Team can be reached at 847-226-0584. This notification must happen within 24 hours of all recalls/holds/withdrawals involving EB products. Suppliers MUST NOT contact distribution centers or customers directly.
- The supplier is responsible for all costs incurred by USF associated with any product recall or withdrawal.
- In order to initiate a product recall/hold/withdrawal, the following information is required and must be e-mailed to recallteam@usfoods.com:
    - Product information (USF product code, brand, product name, pack size, production date or lot number, and manufacturer's SKU).
    - For Class I & II recalls, the Request for Information (RFI) form must be completed and returned to the USF' corporate recall team within 6 hours
    - For Class III recalls, Market Withdrawals and Product Holds, the RFI must be completed and returned to the USF' corporate recall team within 12 hours.
    - Classification of the recovery and the reason for the recovery.
    - USF distribution centers that received the product, the dates of shipments, purchase order numbers and the quantity of product delivered.
    - Instructions for product disposition.
    - Instructions for customer notification, if applicable.
- All recalls and withdrawals must be conducted in compliance with applicable federal or state regulations.
- The supplier is responsible for notifying the FDA at the Reportable Food Registry within 24 hours for any food recall involving a potential risk to human health.
- The supplier must provide the USF Corporate Recall Team with the assigned Reportable Food Registry ICSR Number within 24 hours.

The following checklist should be followed in the event recall or recovery action is needed:

1. Determine the magnitude of the event: are people becoming ill? Has a product tested positive for a food borne pathogen such as Listeria or Salmonella? Is this a quality issue with no danger to human health? If there is a possibility of an illness, contact the USDA or FDA immediately for help in determining the danger.
2. Determine the extent of the problem: When did this problem occur? Is it limited to a specific lot or batch? Your goal is to identify what date/lots of product are being recalled.
3. Contact the USF Corporate Recall Team at 847-226-0584 or **recallteam@usfoods.com** with all of the following information:
    - Product identification, including name, brand, pack size, production date, and product codes on the container, etc.
    - A short description of why you are recalling the product
    - Classification of the recall: Class I, II, III, or a market withdrawal
    - The codes USF uses to order and sell the product, such as our ASYS or PSYS numbers
    - The lots or shipments that are being recalled sorted by the date you shipped to each of the USF distribution centers (using USF Supplier RFI Form)
    - Disposition instructions
    - Customer contact instructions
    - Your corporate contact name, phone, and email.

A mock recall must be conducted and documented twice per year.

The supplier must be able to identify where 100% of product was shipped within 4 hours of initiating the mock recall.

4.4. SITE STANDARDS

4.4.1. Food Defense

Facilities must have a documented food defense program in place. Controls must be in place for personnel, facility and product. This program must be designed to follow established industry standards (USDA Food Defense and Emergency Response) and/or the Food Safety Modernization Act (FSMA). At a minimum, the following provisions must be in place.

- PERSONNEL:
    - Visitors, including contractors, must be required to sign in.
    - Visitors and contractors must sign a copy of GMPs and appropriate food safety practices that must be observed while in the facility.
    - Visitors and contractors must be accompanied while in the facility.
    - Background checks must be completed for all new hires and temporary employees prior to hiring.

- New and temporary employees and contractors must receive training on the facility's bioterrorism program. Training be must be documented and include, but not be limited to, product tampering, food safety, reporting suspicious activity, and preventing contamination. Training must also include the procedure for anonymously reporting potential tampering issues within the facility.

- FACILITY:
  - All facilities must be registered per appropriate regulatory registration requirements.
  - Procedures must be in place to prevent unauthorized access to the manufacturing facility.
  - Facility boundaries must be clearly defined on a site plan and have adequate measures in place to prevent unauthorized access.
  - Procedures must be in place to ensure that only authorized individuals have access to manufacturing and storage areas through designated access points.
  - All exterior doors must be equipped with locks and alarms in order to control and monitor access. Highly recommend the use of cameras.
  - Security audits must be performed and documented at a set frequency.
  - Temporary storage facilities or trailers must be part of the food defense program.
- PRODUCT
  - Measures must be taken to ensure that exposed packaging, raw materials and products are not stored or staged in high traffic areas.
  - Supplier must have a system for employees to anonymously report product tampering.

4.4.2. Facility & Equipment Requirements

Suppliers must ensure facilities and equipment are properly designed and maintained to ensure the production of safe food products.

- FACILITY
  - Food manufacturing facilities must be constructed so they are cleanable and allow operations and storage to be conducted in a safe and sanitary manner.
  - Facilities must be designed to ensure adequate separation of raw and cooked product zones.
  - Facilities must allow for a proper flow of personnel and equipment to prevent contamination between raw and RTE zones.
  - All utilities within the production and storage areas must be designed, constructed, maintained, and monitored to effectively control the risk of product contamination.

- EQUIPMENT
  - Equipment must be suitably designed and constructed for the intended purpose and to enable effective sanitation.
  - All equipment must undergo a sanitary design review upon installation or modification prior to being used in the production of EB products.
  - USF must be notified if changes to equipment in order to develop a commissioning plan, if needed.
- MAINTENANCE OF EQUIPMENT
  - A preventative maintenance program must be in place, including a schedule of activities and records of completion.
  - A process must be in place to ensure and document that all equipment is cleaned and sanitized after maintenance activities
  - A process to identify repairs needed to the facility and equipment must be in place.
    - Repairs must be completed in a timely manner while maintaining sanitary conditions.
    - All repairs must be documented and performed by qualified, trained personnel. All temporary repairs must be identified with a date and name of who is responsible for the repair.
    - All food safety related work orders must be prioritized.

4.4.3. Foreign Material Control

A hazard assessment of the raw materials, process, and environment must be completed in order to determine the potential hazards.

The foreign material program must include, but not be limited to the following:

- Identification of all potential hazards (e.g. metal, wood, bone, glass, etc.)
- Detection equipment must be calibrated to an appropriate frequency based on manufacturer recommendations at a minimum.
- Detection limits should be appropriate and effective for the products being inspected and be based on risk.
- Metal detectors sensitivity standard must be set to maximize operating sensitivity of the metal detector for the given product.
- Filters – checked a minimum of weekly or at a frequency able to demonstrate control. Looking for wear to prevent failure of the screen.

4.4.4. Sanitation

There must be policies and controls in place to ensure that the facility is operated in a sanitary manner. There must be a qualified and trained person accountable for overseeing all sanitation functions at the facility.

An effective cleaning and sanitation program must be properly implemented and documented

within the facility. Leadership must be responsible for the overall cleanliness of the facility.

Sanitation Standard Operating Procedures (SSOPs) must be in place for all sanitation activities within all product processing and storage areas.

- An SSOP must include the responsible party, equipment to be cleaned and method and chemicals to be used.
- Master sanitation schedules must be determined by risk assessment to determine the different types and levels of cleaning required on specific equipment between batches, shifts, etc., as well as frequency (e.g. daily, weekly, monthly, etc.).
- All tools, including but not limited to maintenance, operation, sanitation and QA must be under a validated sanitation program. The master sanitation schedule must be updated and maintained on a set frequency.
- Where sanitation contractors are used, the facility must designate internal personnel responsible for contracted sanitation activities.
- All chemicals used for sanitation must be properly labeled, stored and locked when not in use. Only chemicals acceptable for use in food processing establishments may be used. Chemical strengths must be monitored. Calibration of automated mixing equipment must be completed according to the manufacturer's instructions

4.4.5. Pathogen Control and Monitoring

Facilities producing RTE microbiologically sensitive products, must implement an environmental monitoring program in accordance with one of the guidelines below. Pathogens monitored must be specific to the product, process, and environment from which the product is produced.

- FDA regulated products follow the *Draft Guidance for Industry: Control of Listeria monocytogenes in Ready-To-Eat Foods.* https://www.fda.gov/downloads/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/UCM535981.pdf
- USDA regulated products follow the *FSIS Listeria Guideline: Listeria Control Program: Testing for Lm or an Indicator Organism* https://www.fsis.usda.gov/wps/wcm/connect/259fcaf4-ce2b-4ba1-8140-da873243040f/Chapter_3_Controlling_LM_RTE_guideline_0912.pdf?MOD=AJPERES

4.4.6. Pest Prevention

Suppliers must have an effective integrated pest management program in place to ensure that the entire facility and surrounding grounds are maintained in a sanitary and pest-free condition. A risk-based program must be managed by a licensed and insured pest control operator and be compliant with GFSI and/or Codex Standards.

- Provisions must be made to prevent contamination with food, equipment and packaging materials.
- All documentation including the pest control log, license, insurance, labels, SDS, etc. must be maintained and available for review for USF.

- Pest control activity trending and analysis must be completed at a predetermined frequency as recommended by the pest control provider.

4.4.7. Transportation Controls

Suppliers must have policies and controls in place to ensure that products are transported from the manufacturing site to the USF distribution center in a timely manner and in a manner that meets all regulatory requirements for the transportation of the food type. Suppliers must place the appropriate lot codes and transit temperature requirements on the bill of lading (BOL) to ensure compliance with USF specifications upon receipt.

- SHIPPING & RECEIVING CONTROLS**:**

  Procedures and practices to ensure control of incoming products must be in place, including inspection of trailers, recording product temperatures, and inspection of loads and pallets. Receiving activities must be documented.

- TRANSPORTATION AND STORAGE REQUIREMENTS**:**

  A written program must be in place that meets all regulatory requirements for the transportation of food and details the following at a minimum:

  - All vehicles used for transportation must ensure the food safety, legality, and quality of materials e.g. raw materials, packaging, work in progress and finished goods.
  - If a 3rd party carrier is used, all the requirements must be defined within a contract executed between supplier and carrier and effectively managed by the party. This includes storage or cross dock facilities where used as part of the contract.
  - Temperatures must be appropriate for the product shipped.
  - A process must be in place and documented to evaluate the condition of the trailers and products prior to unloading. The evaluation must include inspection of trailer conditions, packaging integrity, temperature (where required), lot coding, pallet condition, and no evidence of pest infestation.
  - All loads must be secured within the trailer to prevent damage during shipping.
  - Suppliers must have controls in place to manage food that is damaged during shipping and storage.
  - Systems must be in place to ensure that finished goods are protected during transit i.e., all full loads and less than full loads (LTL) to and from the facility must be secured (sealed or locked), and all ingredients, products, and packaging are inspected at receipt to ensure integrity. If the load is LTL and if seals are used, new seals will need to be used at each stop, and this must be documented on the BOL by the company installing the new seals.
  - Inspection process must be in place to ensure carrier cleanliness prior to loading.
  - Vehicles used for transportation must be well maintained and in a good hygienic condition.

- Documented maintenance and hygiene procedures must be in place for all vehicles (including pipe work e.g. milk tankers).

○ PREVENTING CROSS CONTAMINATION AND CROSS CONTACT

- Procedures must be in place to minimize the risk of all types of cross contamination and cross contact during transportation.
- Where materials are susceptible to weather damage, vehicles must be unloaded/loaded in covered bays or materials suitably covered to protect the materials.
- Hazardous materials must not be hauled in the trailer.
- Controls must be in place to prevent cross contamination and cross contact between raw foods and ready-to-eat foods. This may include separation of the two types on different pallets and/or placing raw foods beneath ready-to-eat foods.

○ TEMPERATURE:

- All products transported using mixed temperature loads must meet USF product temperature requirements. Suppliers must use bulkheads to separate frozen and refrigerated/dry foods.
- BOL must include shipping temperature requirements and lot codes.
- Chilled/frozen materials must be loaded and unloaded in temperature controlled bays, or in a manner that ensures that temperature is not compromised.
- Procedures must be in place in case of breakdown of vehicle refrigeration. All incidences of refrigeration equipment breakdown must be recorded and corrective actions documented.
- It is critical that the specific temperature settings for the trailer or each compartment be listed on the BOL. The use of statements like “Keep Refrigerated” or “Keep Frozen” are not acceptable unless accompanied by the specific temperature setting.
- Controls must be in place to prevent products that are not designed to be frozen from freezing. Frozen products must be separated from refrigerated and dry foods by using adequate bulkheads. In order to achieve this, the trailer must be set at 0°F or as appropriate in order to ensure a proper temperature.
- Ambient Air Temperature must be at or below 45°F for shell eggs.
- All seafood is received at temperatures that comply with all local, state and federal regulations.
- Product are to arrive within the following temperature ranges:

Product	**Acceptable Temperature**
Refrigerated Ready to Eat (RRE) Product	33°F to 40°F
Ice Cream	-20°F to 0°F

Frozen Foods	-10°F to 10°F
Fresh Raw Meat, Poultry, and Seafood	28°F to 40°F
Fluid Dairy, Cultured Dairy Yogurt and Sour Cream	33°F to 45°F
Sliced and shredded cheese, butter	33°F to 40°F
Process pasteurized cheese (EZ Melt, Kraft singles), Blocks and Natural Cheese and cottage cheese	33°F to 45°F
In the shell unpasteurized eggs	33°F to 45°F
Pasteurized and processed eggs	33°F to 40°F
Dressings and sauces labeled keep refrigerated	33°F to 40°F
Dressings and sauces not labeled keep refrigerated and margarine	33°F to 90°F
Dry Onions, Watermelons, Uncut Tomatoes, Avocados(Before Ripe), Bananas(Before Ripe)	50 to 90°F
Basil, Ginger Root, Limes, Ripe Avocados, Dry Onions, Bananas (After Ripe), Watermelons, Uncut Tomatoes, All Dry Potatoes and Dry Sweet Potatoes	50 to 70°F
Lemons, Mangos, Eggplant, Peppers, Summer Squash, Winter Squash, Cucumbers, Uncut Honeydew Melons, All Dry Potatoes (Preferred), Dry Sweet Potatoes (Preferred) Whole Green Beans	40 to 50°F
All Berries, All Pre-cut Fruit and Vegetables including all Salad Mix, Wet Salads, Sprouts, Apples, Grapes, Kiwi, Cantaloupes, Bok Choy Spinach, Cabbage, Parsley, Napa (Chinese Cabbage), Garlic, Liner Lettuce, Avocado Green to turn, Radish, Green Peas, Mushrooms, Snow Peas, Oranges, Tangerines, Grapefruit, Herbs Broccoli, Green Onions, Celery, Leaf Items, Artichokes, Carrots, Corn, Asparagus, Escarole, Endive, Kale, Leeks	33 to 40°F

- Cold Chain Verification
  - Time-temperature recording (TTR) devices are currently required in certain loads of seafood, refrigerated produce, dairy products, and other high-risk refrigerated or frozen products. Some restaurant chain customers require TTRs.
  - Where temperature controlled transport is required documented procedures including break down instructions must be in place to ensure the temperature requirements are met. Transport must be capable of maintaining product temperature within specification under maximum load.
- RETURNED GOODS CONTROLS:

A documented program must be in place outlining the management of any finished product returned to the facility after it has left the control of the company. The following should be included as a minimum:

- Methods used to segregate and evaluate the condition of the product when received.

- Appropriate methods of disposition or charitable donation.
- Restriction that returned product is not reused as rework in current production.
- Restriction that once a product has been rejected, that same product cannot be delivered to another USF division and product disposition must follow the USF policy.
- Please see Allergen Controls section for additional details on product disposition.

4.5. PRODUCT CONTROL

4.5.1. Product Design and Shelf Life

EB products must be designed, manufactured and distributed to achieve declared shelf life.

- Product Design
  - Microbial hurdles (temperature control, water activity, pH, antimicrobials, inhibitors, etc.) must be incorporated into the design of products in order to maintain food safety objectives.
- Shelf Life
  - Shelf life of all products must be validated.
  - Shelf life must be determined based on product formulation, microbiological growth, organoleptic properties, packaging process and material, facility environment and subsequent storage conditions.
  - Shelf life validation must include evaluation of fresh product and product at the end of its shelf life. Microbiological validation must be conducted at an ISO accredited lab. Organoleptic testing must be conducted to verify that product at the end of its shelf life is not substantially different than fresh product.

  Controls must be in place to ensure that only product with sufficient shelf life remaining is shipped to USF distribution centers.

4.5.2. Labeling and Claims

Supplier must follow labeling and claims requirements in the USF Exclusive Brands Food Labeling Policy. All claims made on EB products must be substantiated by the supplier and verified by USF Regulatory Compliance.

A GTIN-14 (SCC, ITF-14) Barcode that meets all GS1 guidelines must be placed on all outer packaging in conformance with the following requirements:

- Printed on two sides of the outer container
- Barcode must be printed as close to full scale as possible and incorporate bearer bars at a minimum on the top and bottom (full bearer bars preferred)
- The final printed version of the barcode should be scan with a C grade or better

All inner packages that meet retail sale requirements must include the UPC barcode.

4.5.3. Allergen Controls

Suppliers must have an effective allergen program in place to prevent allergens cross-contact and the inadvertent inclusion of major allergenic proteins in products where they are not labeled as being present. .This program and methods must be risk based, documented

and implemented throughout the facility. The list of allergens currently defined by the FDA and USDA can be found at the following links.
http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/LabelingNutrition/ucm064880.htm

http://www.fsis.usda.gov/wps/portal/fsis/topics/regulatory-compliance/labeling/ingredients-guidance/allergens-voluntary-labeling-statements/allergens-voluntary-labeling-statements

- All staff must receive allergen training upon hire and at a minimum of annual frequency. Where allergens are used, staff must be aware of the risks regarding cross-contact.
- Ingredients, food contact materials and processing aids used in the production of all products must be reviewed to ensure that all allergenic components are identified prior to receipt.
- Transport of materials must not pose a risk of cross-contact. Bulk tankers used for both allergenic and non-allergenic raw materials must be able to provide cleaning records.
- Facilities must allow for a proper flow of personnel and equipment to prevent contamination between allergenic and non-allergenic components.
- Segregation of allergens must be based on risk assessment. Allergens must be received and stored in a manner that protects other non- allergenic materials from inadvertent contamination. Products that contain allergens must be clearly identified and segregated from products that do not contain allergens. Label verification must be completed for every shipment of allergens containing products received.
- All allergens must be clearly labeled per the USF Exclusive Brands Regulatory Food Labeling Manual. Written procedures must be in place to ensure that labeling is accurate and consistent throughout all points during the receiving, storage, manufacturing and shipping process.
- Rework that contains allergenic ingredients must be reworked only into products that contain that allergen. Based on risk assessment, processing aids such as oils and fats used for the processing of allergenic foods must not be subsequently used for frying products not containing allergens. Controls must be in place to ensure that work in process (WIP) or rework is only incorporated into like products.
- Order of production should be scheduled so that products containing allergens are produced last and followed by full sanitation.
- Procedures must be in place to ensure that equipment used for the production of allergen-containing products is cleaned and sanitized prior to producing products which do not contain the allergen.
    - Sanitation methods must be validated to determine if target allergens are effectively removed. This may be accomplished by a third party, allergen surface swabs, or etc. to confirm that sanitation procedures are effective at removing target allergens.
    - Sanitation methods must be reviewed annually or after any change in the equipment or procedures.

- The cleaning of equipment where allergens are used must be verified with each allergen changeover and documented, at a minimum visual inspections can be used.
    - Equipment must be disassembled as appropriate and cleaned, to remove all visible debris after an allergenic product is processed. The area around the equipment must also be cleaned.
    - Utensils and tools used for handling allergens must be chemically cleaned after use or dedicated to specific ingredients.
- Protocols must be in place to provide disposition of commingled products. Open product that has been in contact with allergenic material must be disposed of, if not being used in like product.

4.5.4. Finished Product Pathogen Testing

Products and processes that are sensitive to pathogen contamination or products that have a historical industry occurrence of pathogen presence may require finished product pathogen testing. In such cases, USF may require ongoing COA's listing pathogen test results for all relevant production lot codes.

- Any product subjected to pathogenic microbial testing must be controlled by the supplier until product safety is confirmed. A program must be in place to prevent product from being shipped to/received by USF prior to completion of pathogen testing.
- When finished product pathogen testing is undertaken, products must not be shipped to USF until results are complete and documentation is provided.
- If an initial hazard test result is confirmed positive or above acceptable limits, a re-test result is not acceptable for releasing product to USF.
- Any product testing confirmed positive or out of specification for a defined hazard (i.e. microbiological, chemical, antibiotic, pesticides, etc.) must not be shipped to USF. USF Food Safety & Quality Department must be notified in this situation.

4.6. PROCESS CONTROL

Suppliers must have controls in place to ensure that products are safe, properly labeled, and conform to specifications and applicable regulations.

4.6.1. Temperature Controls

All temperature-controlled areas of production and storage must be continuously monitored using a system appropriate for the product and facility.

4.6.2. Rework Controls

Use of rework must be avoided or significantly minimized for USF EB products.

All rework policies must clearly define how long rework may be held and reworked back into production and the percent rework allowed in each product. A program must be in place to ensure all rework is fully traceable at all times. Systems must be in place to ensure that rework is clearly identified and that traceability is maintained at all times.

Rework must only be used in products that are properly labeled to declare the presence of allergens, animal species, or other ingredients, and must meet quality specifications.

4.6.3. Work In-Process Controls

EB product must be maintained segregated during production and storage to preserve the identity of claims (i.e. Kosher, Halal, Organic, etc.).

Production records must include lot identification for all raw materials used for that production sequence.

Controls must be in place to manage work-in-process inventories to ensure they are used in a timely manner.

4.6.4. Verification of USF Specifications

Each facility must have a program in place to ensure that all products are being produced to meet USF' specifications.

Facilities must have a documented program in place for testing and evaluating product against USF Product Specifications.

If a supplier contracts a co-packer to produce USF products, the supplier must ensure that co-packer product meets USF Product Specifications.

Documented in-process and finished product quality and safety checks of all EB products must be done at a frequency to ensure compliance to the specifications and must be made available to USF Food Safety & Quality Department for review upon request.

Retain samples should be held, whenever possible, for the durations of product shelf-life.

All QA checks and finished product testing must be documented and records must be made readily available to USF Food Safety & Quality Department for review.

4.6.5. Weights and Measures Compliance

Facilities must have a documented policy and procedure for the management of weight, volume and count for each product manufactured in compliance with applicable FDA and USDA regulations.

All scales and equipment used to verify finished product weight and count must have documented certification inspections at a risk based frequency.

The net weight of each product/case/lot must meet the regulatory standards for net weight compliance.

4.6.6. Equipment Calibration

A documented process must be in place to ensure that all equipment and tools are appropriate for their use and calibrated and documented on a predetermined schedule based on manufacturer recommendations at a minimum

4.7. PERSONNEL

4.7.1. Training

Suppliers must have procedures and training programs that will be executed to ensure that

products manufactured for USF will be safe and meet the quality requirement of USF. Documentation of procedures and training must be made available upon request.

- Training programs must be in place and administered to appropriate employees at a frequency appropriate for the topic.
    - Training must be designed to ensure thorough understanding and retention of the material.
    - Training must be documented.
    - Training must be adequate for those responsible for food safety and quality and include provision to cover for the absence of key personnel, temporary and part-time employees.
- Training programs must include, but are not limited to the following topics:
    - USF Product Specifications
    - Customer Complaint Management
    - Allergen Management
    - Environmental Controls
    - Identity Preserved Products (Kosher, Hall, Organic, etc.)
    - Good Manufacturing Practices (GMPs)
    - Employee Illness
    - Hold and Release Program
    - Food Defense
    - Recall / Product Recovery
    - HACCP for employees with HACCP related responsibilities
    - PCQI – for FDA facilities
    - Sanitation procedures and chemical handling instructions
    - Maintenance Procedures
    - Receiving and Shipping Procedures
    - All Prerequisite programs for all employees as appropriate to their function

4.7.2. Employee Hygiene Practices

A written employee hygiene program, compliant with FSMA and Current Good Manufacturing Practices, must be in place.

All persons working in direct contact with food, food-contact surfaces and food-packaging materials must conform to hygienic practices while on duty to the extent necessary to protect against contamination of food.

4.7.3. Employee Illness

Employees who exhibit symptoms of injury or illness that may have an effect on food products or packaging must not be permitted to work in areas where product or packaging could be impacted.

- Suppliers must have a program addressing employee illness and its impact on product safety. The program must include, at a minimum, the following:
    - Personnel must be instructed to report such health conditions to their supervisor immediately.
    - Open sores, cuts and other lesions must be covered with clean and

impermeable coverings issued by the facility.

- Any person who, by medical examination or observation, appears to have an illness, open lesion, boils, sores, or infected wounds, or any other abnormal source of microbial contamination by which there is a reasonable possibility of food, food-contact surfaces, or food-packaging materials becoming contaminated, must be excluded from any operations which may be expected to result in such contamination until the condition is corrected.
- Facilities must have a blood borne pathogen program stating affected employees must be immediately removed, all contaminated equipment cleaned and sanitized, and all contaminated product and packaging destroyed. The program must include specific instructions for cleanup and preoperational inspection.

5. Category Specific Requirements

5.1. ANIMAL WELFARE

Suppliers who deal with live animals must have policies and quality systems in place that support and manage the treatment of animals in their supply chain to ensure they are handled without abusive or cruel treatment. The policy must meet the Professional Animal Auditor Certification Organization (PAACO) Minimum Standards for Assessments of Animal Welfare Audits.

- Each supplier must have a written policy statement supporting animal welfare practices.
- All suppliers must have programs & systems in place that support and manage the treatment of animals in their supply chain to ensure they are handled without abusive or cruel treatment. Documentation must be made available upon request.
- All animal facilities must be audited and hold updated certifications to an industry recognized animal welfare standard
- Each supplier must conduct routine internal audits of their operations to assess their compliance to accepted good handling principles.
- Updated animal welfare audits, certifications, and policy statements must be posted and maintained in USF' designated data management system.
- Suppliers not meeting these USF requirements will have action taken against them, including but not limited to: supplier restriction, suspension, termination.

5.2. READY-TO-EAT USDA REGULATED PRODUCTS

Facilities producing post lethality exposed RTE meat and poultry products must at a minimum use a post-lethality treatment that manages the presence of Listeria monocytogenes, as referenced in the current USDA guidance and/ or additional updates: Compliance Guidelines to Control Listeria Monocytogenes in Post-Lethality Exposed Ready- To-Eat Meat and Poultry Products 2014

Facilities must at a minimum achieve Alternative 2 and continuously work towards achieving Alternative 1.

All piece stock used for our Metro Deli brand must have inhibition system to ensure < 2 log growth of Listeria for two weeks post exposure

5.3. POULTRY

Salmonella and Campylobacter programs controls – suppliers must have appropriate systems intervention technologies in place and included in their HACCP program to manage potential for salmonella and campylobacter and reduce or limit the amount of Salmonella in poultry products, as per USDA.

Suppliers must have implemented testing programs that adhere to all applicable federal and USF requirements. These may include but are not limited to programs for Salmonella & Campylobacter that meet the USDA/FSIS performance standard.

Raw-material suppliers must have programs in place to ensure the prevention and control of avian influenza and other diseases.

A validated antimicrobial intervention system must be in place for non-intact poultry products. This must be addressed in the Letter of Guarantee.

5.4. BEEF AND VEAL

The minimum requirements for suppliers of beef & veal products can be found in the US Foods Beef & Veal Supplier program. The documentation detailed within the program may be provided either in whole, (as part of a Letter of Guaranty (LOG)), or as separate documents that attest to the establishment's compliance to each of the specified requirements. These documents are to be updated on an annual basis (or more frequently as circumstances dictate) unless otherwise noted. These will be kept on file on the supplier's customer portal or USF Data Management System.

5.5. PORK, LAMB, SILURIFORMES & OTHER VOLUNTARY INSPECTED EXOTIC PROTEINS

Suppliers must have implemented testing programs that adhere to all applicable federal and USF requirements. These may include, but are not limited to programs for Salmonella – that meets USDA/FSIS performance standard.

5.6. SEAFOOD

For refrigerated ready-to-eat seafood products with transit time of over four hours to a USF facility, an approved time-temperature recorder (e.g. Sensitech TempTale) must be included on the load.

Species must be verifiable by lot. The supplier must have a species-verification program in place to ensure accuracy and compliance of species being packed, where applicable.

No banned antibiotics, as defined by the FDA and the state regulatory authority, must be present (at any detection level) in any seafood products packaged under the USF label• Suppliers not meeting these USF requirements will have action taking against them, including but not limited to: supplier restriction, suspension, termination.

5.6.1. Labeling Requirements

A seafood weight-verification program must be in place and meet declared label weights for flesh weight versus glazed product weights.

An Economic Integrity Program must be in place using USDC inspection or another certified 3rd party tester to verify net weight, counts, and uniformity.

Shellfish must be harvested in approved areas only, using approved methods, and must

comply with all FDA required label requirements.

Suppliers must adhere to all legally required fishery practices, Endangered Species Act regulations, fishery management quotas, coastal zone management, and/or other mandated fishery product regulations according to country of origin.

Any supplier importing anti-dumping sanctioned or trade tariff governed products must comply with any and all government regulations, including correct Country of Origin labeling. Any supplier proven to be in contradiction or circumventing these restrictions will face disciplinary action, including removal from the system if warranted.

Product Packaging must comply with all US Customs and FDA requirements for:

- Country of Origin
- Species identification
- Net weight labeling
- Count per pound (if applicable)
- Breading percentage (if applicable)
- Portion size
- Farm raised or wild caught
- Allergen labeling in accordance with Fish & Fishery Products Hazards & Controls Guidance (4th Edition April 2011)

5.6.2. Miscellaneous

A letter of parasite destruction must be uploaded into USF designated data management system regarding any product that could be consumed raw.

Suppliers must have a traceability program to document the source of product from raw material at point of harvest through production to finished product shipment to USF. Documentation must be retained for a minimum of two years.

Safe Thawing instructions for all VP seafood.

Suppliers certified as sustainable seafood such as Marine Stewardship Council and Best Aquaculture Practice must post certificates in USF designated data management system.

Raw Molluscan shellfish must be from a licensed processor listed on the United States FDA Interstate Shellfish Shippers List".

5.6.3. Seafood Species, Net weight and Antibiotic Free Verification

Suppliers must have a species verification program. Suppliers must upload their own species verification program letter to USF designated data management system.

EB suppliers must participate in the USF Seafood Verification Program. This includes third party verification for imported products, DNA species verification and sporadic evaluations of product.

Grouper and red snapper suppliers are required to submit bi-annual genetic species identification testing results for each species and processing facility, and we require a CoA for tested lots.

Suppliers must have a program in place verifying farmed seafood is free from antibiotics, chemicals, and pesticides. Levels are defined by the FDA. In the case where antibiotics and

pesticides are not a risk in specific farmed seafood, suppliers may forward a justification letter to USF Food Safety & Quality Department.

FSQA Department must be notified in writing of FDA import detentions that are from facilities that pack USF branded product. Any facility involved will be added to USF inspection program.

FSQA reserves the right to arrange 3rd party testing at a facility or farm at the supplier's expense.

5.6.4. Seafood HACCP

Suppliers must follow the current Fish & Fishery Products Hazards & Controls Guidance. This guidance applies to processers, distributors and storage of seafood. EB suppliers must review HACCP plans annually under the guidance of the Fish & Fishery Products Hazards & Controls Guidance.

Updated Seafood HACCP plans for processors, distributors and 3rd party warehouses must be uploaded along with the Certificate of the HACCP certified individual to the USF designated data management system.

5.7. SHELL EGGS/EGG PRODUCTS

Must be compliant with the regulation published in 21 CFR Parts 16 and 118 Prevention of Salmonella enteritidis in Shell Eggs During Production, Storage, and Transportation; Final Rule July of 2009 by the FDA Center for Food Safety and Applied Nutrition, in addition to further updates.

5.7.1. Fresh shell eggs

Suppliers must have product testing protocols and appropriate intervention technologies in place to reduce the potential for Salmonella found in fresh shell eggs.

Eggs must be packed in compliance with the US Standards for Grades and weight classes for all shell eggs of Fresh Eggs.

Suppliers (actual egg producer or egg handler) are responsible for ensuring all eggs sold to USF meet all requirements/regulations of the state the USF division is located.

Shell eggs must be part of the USF' United States Department of Agriculture's Agricultural Marketing Service (USDA AMS) Monitoring Program and marked with USDA grading shield on the outer case (exceptions must be approved by USF FSQA. All grading is to be completed following 7CFR Part 56, Regulations governing the voluntary grading of shell eggs.

Suppliers (the actual egg producer and/or egg handler) are to ensure that all eggs sold to USF destined for end customers in the state of California, are compliant with Sections 1350 and 1354 of Title 3 of the California Code of Regulations and any applicable updates that follow. A statement on the supplier's letterhead is to be posted within the USF designated data management system stating that these products are meeting all the applicable laws and regulations for sale in California.

5.7.2. Liquid egg products

All liquid egg products must be pasteurized.

Any supplier importing anti-dumping sanctioned or trade tariff governed products must

comply with any and all government regulations, including correct Country of Origin labeling. Any supplier proven to be in contradiction or circumventing these restrictions will face disciplinary action, including removal from the system.

5.8. PRODUCE

The supplier location form needs to be kept current and posted in the Data Management System. New growers, co-packers or facilities cannot be added without document and facility review and approval by USF Food Safety & Quality Department.

All Cross Valley brand products, including repacks may only be packed/stored at USF approved processing, cooling, repacking or consolidation facilities, Approval includes annual GFSI certification, an annual risk assessment, possible on-site approval for new suppliers and a listing on the USF approved supplier list with an active GLN number.

Product that is in mesh bags or not completely enclosed cartons must have a slip sheet between the pallet and the bag.

5.8.1. Raw Materials and field practices

All Cross Valley Farms suppliers must comply with all parts of the FSMA Produce Rule, as applicable.

Fresh fruit and vegetable suppliers must have a program in place in which raw material suppliers are approved and managed. Raw materials must be sourced from these approved suppliers.

Raw materials must comply with all Federal, State and Local guidelines for the application of chemicals and pesticides. Raw materials must be tested for residues at a predetermined frequency. Limits must be established and products over the limit must not be packed in Cross Valley Farms brand cartons.

All categories need to adhere to commodity specific guidelines, (i.e. Tomato and Leafy Green Marketing Agreement.)

Commodity produce items cannot be shipped more than 2 days from harvest. Harvest day is day 0. Consolidators must ship produce within 2 days of harvest.

Annual GFSI audits must be conducted on growing fields and harvest crews where USF produce will be harvested.

5.8.2. Leafy Greens Field Pack

Commodity leafy green supplier personnel will communicate daily with the USF produce inspectors regarding the days' Cross Valley Farms orders and the locations they will be packing. Suppliers are expected to meet the Cross Valley Farms specification. If the specification is met, the supplier is allowed to pack without the inspector being present. Product packed without the inspector present may be subject to an evaluation at the cooler.

Cross Valley Farms leafy greens cannot be packed when the temperature is above 85 degrees F and must be cooled within 3 hours of harvest.

Setbacks need to be determined on a case by case basis through a risk assessment of the specific location and must comply with FSMA.

5.8.3. Packaging & Labeling

No staples are allowed in any Cross Valley Farms product cartons.
Kraft cartons with the Cross Valley logo and the cooler temperature color map must be used for Cross Valley Farms products.
The label must include the GS1 format. The GTIN and GLN will be provided by USF.
Mesh bags must have a code date that adheres to the bag throughout transport to the end user.
Retail (PLU) stickers or information cannot be included on any product or packaging without approval from USF Rosemont.
All produce items must have a code date to ensure traceability. The date of pack must be listed on the outer/master case.

5.8.4. Processors

Value added produce suppliers (e.g. cut produce), must have at least one antimicrobial intervention step in the process to minimize microbial hazards
Value Added processors must comply with all sections of the Preventive Controls Rule.

5.8.5. Re-packers

Tomato re-packers must use an antimicrobial wash on the product before packing to minimize microbial hazards. The type and concentration must be listed in the SOP. It must be checked and documented. Product for repacking can only be sourced from Cross Valley Farms approved suppliers.

5.8.6. Shipping and Temperature controls

Mixed temperature loads must be shipped at a temperature appropriate to the product requiring the coldest temperature. Blankets must be used to protect the items that would be affected by the cold.

A Sensitech RF Time-Temperature Recorder (TTR) is required on all loads of Refrigerated Ready-to-Eat processed produce loads. For multi-stop loads, each USF division needs its own TTR included with the product.

The temperature during transit must be less than 40°F for the duration of the transit or at a temperature appropriate for the type of produce.

All produce loads must be protected from freezing and/or freezing temperatures.

Suppliers must list the shipping temperature on the shipping documents.

All loads must be shipped in accordance with Perishable Agricultural Commodities Act (PACA) regulations.

Ethylene-producing products must be properly separated from non-ethylene-producing products.

5.9. FROZEN FRUITS AND VEGETABLES

5.9.1. Fresh Fruit and Vegetable Sourcing

Fresh fruits and vegetables must be harvested from farms where good agriculture practices are in place.

Good Agricultural Practices (GAP) audit reports must be made available to USF upon request.

Must have a program in place in which raw material suppliers are approved and managed. Raw materials must be sourced from these approved suppliers.

Raw materials must be tested for chemical and pesticide residues at a predetermined frequency**.**

5.9.2. Production controls

All facilities must have a quality program in place to prevent various key quality issues from occurring. These may include:

- Freezer burn
- Mechanical injuries caused by processing
- Foreign material
- Inconsistency in color, sizing and texture

Fruits and vegetables must be processed in a timely manner after harvesting to ensure freshness and consistent quality.

Blanching and freezing time/temperature records must be maintained.

5.9.3. Storage controls

All storage rooms must have a documented temperature control recorder that is monitored daily. During storage, temperatures must be maintained to optimize product quality.

5.9.4. Agricultural Marketing Service (USDA AMS) Monitoring Program

All EB Frozen Fruit & Vegetable products must be evaluated within the USF USDA Monitoring Program and evaluation results will be communicated to suppliers quarterly.

USF has contracted with USDA AMS to perform inspections of various frozen fruit and vegetable products at their hub locations. USDA inspects product according to USF Product Specifications. Samples will be unofficial and selected at the hub locations by cold storage employees as requested by USF.

If during the course of the inspection of an EB products fail to meet USF specifications, but do meet the stated USDA grade, USF will communicate the results to the supplier. USF requires that production records representing the entire duration of the lot in question be provided within 48 hours.

USF will require that an official USDA sampling be performed on any lot of EB product which has been downgraded by the USDA. If the stated grade is upheld, USF will communicate the release of the product from the hold status. If the stated grade is not upheld, USF will require that product be removed and replaced from the warehouse by the supplier.

Suppliers may elect to remove and replace non-conforming product form the warehouse as an alternative to the official sample.

The supplier is responsible for producing product that meets USF specifications. If the product needs to be discarded due to product quality or safety, the supplier must be held responsible.

5.10. CANNED ITEMS

The equipment and procedures used for pasteurization or thermal processing must be designed to ensure each unit in a batch receives the same sterilizing treatment.

Sterilizing and pasteurizing equipment must be designed and maintained to execute and monitor intended function.

Scheduled processes must be designed and established by competent persons with expert knowledge acquired through appropriate training and experience, and who have access to appropriate facilities and equipment for making measurements and calculations.

Retort process for low acid canned foods must be filed with FDA. Documentation must be maintained on site and made available to USF upon request.

Records of all relevant production activities, tests, inspections, analyses, incubations, evaluations and records of all scheduled processes applied to each batch and actions taken in relation to under processed foods must be maintained and shared with USF upon request.

Closing and seaming equipment for rigid, semi-rigid and flexible containers must be designed and maintained to execute intended function.

Containers must be handled and stored in a way to minimize risk of damage.

5.10.1. Quality control

All products stating drained weight must be based on an equalization period of the product after the product has been canned.

A program must be in place to monitor can seams and seam integrity.

Controls must be in place to ensure product and process consistency.

Controls must be in place to avoid prolonged exposure of canned product within the cooling temperature range as this may compromise product safety and promote the development of heat resistant thermopiles resulting in product spoilage.

5.10.2. Lot Approvals

All domestic Canned Fruit & Vegetable suppliers must participate in the USF Lot Approval Program. The type of approval program required for each supplier is dictated by the brand and product performance. Contact your USF Food Safety & Quality Department Representative to understand which programs are required.

- USF FOOD SAFETY & QUALITY DEPARTMENT LOT APPROVAL

  For certain USF brands, USF representative will evaluate EB product against USF Product Specifications.

- USDA LOT APPROVAL

  The USDA will evaluate EB product against USF Product Specifications.

  The supplier is responsible to coordinate approval schedule with USDA based on volume to prevent inventory shortages.

  If there are inventory issues, the supplier must notify USF Food Safety & Quality Department & Category Management immediately.

- SELF-APPROVAL

  In certain cases where a facility has a demonstrated history of product quality and consistency, USF may grant that facility a Self-Approval option.

  The facility will evaluate EB product against USF Product Specifications.

  In such cases, eligible suppliers will be notified by a USF Food Safety & Quality Department representative.

  These facilities must take full responsibility for any quality/food safety issues that may arise from the lots that were self-approved.

5.11. DAIRY AND CHEESE

The following documents must be uploaded in the USF designated data management system.

- rbst Statement for all dairy suppliers
- Type of rennet used for all cheese suppliers
- Certificate of the individual trained in HACCP

5.12. OILS AND SHORTENING

3rd party identity testing of all oil and oil blends may be requested by USF. Any product found to be noncompliant to specification identity will result in hold and/or withdrawal of the product from the market place. Suppliers of non-compliant product may be subjected to restriction or suspension of further business with USF. Supplier is responsible for all associated costs.

5.13. DRESSINGS AND SAUCES

Only pasteurized eggs may be used in dressing and sauce formulations.

Product design of dressings and sauces must have a minimum of two microbial food safety hurdles. Refrigeration should be used as a quality measure.

5.14. IMPORTED ITEMS

Suppliers who supply imported products must comply with U.S. import regulations and provide support for the timely and accurate customs clearance of products imported by or on behalf of USF. The supplier will act as the FSVP (Foreign Supplier Verification Program) importer of record.

The supplier will be the importer of record (importer) and responsible for the timely and accurate submission of the customs declaration and payment of associated customs duties to U.S. Customs and Border Protection (CBP). The supplier must fulfill its responsibilities as an importer to achieve the timely and accurate customs clearance of products imported on behalf of USF.

Suppliers must comply with all established CBP, Food and Drug Association (FDA), US Department of Agriculture (USDA), and other government agency regulations governing imports of USF' products, as applicable.

Suppliers must also comply with quota and antidumping regulations, including correct Country of Origin labeling. Any supplier proven to be in contradiction or circumventing these restrictions will face disciplinary action, including removal from the system if warranted.

The importer is responsible to meet the requirements of the Foreign Supplier Verification Program under FSMA.

6. *USF Supplier Code of Business Conduct*

USF strives to be best in class in the foodservice distribution industry when it comes to doing business the right way. To achieve this objective, USF requires all of its employees to comply with the law and act ethically and with integrity in all matters. We also require that our suppliers comply with all applicable federal, state, and local regulations and support our commitment to doing the right thing in every aspect of our business.

This Supplier Code of Business Conduct establishes requirements for our suppliers regarding ethical conduct. This Code should not be read in lieu of but in addition to the supplier's obligations as set out in any agreements between USF and the supplier as well as all applicable laws and regulations. Nothing in this Code is meant to supersede any more specific provision in a particular contract, and to the extent there is any inconsistency between this Code and any other provision of a particular contract, the other provision will control.

We appreciate the support of our suppliers and their clear communication of this Code to their relevant employees and third parties. Due to the importance of the items in this Code, USF reserves the right to modify our relationship or cease doing business with suppliers who do not share our commitment to the values discussed herein. It is only through working together that we can achieve our commitment to integrity in all areas of our business.

All questions or concerns with respect to this Code should be directed to the following:

USF Compliance Team
compliance@usfoods.com
847-720-2570

Treatment of Employees

USF is committed to treating our employees and everyone with whom we work, with dignity and respect. Harassment or discrimination of any kind is unacceptable. Any inappropriate conduct by USF employees, supplier personnel or their agents will not be tolerated.

USF is also committed to full compliance with labor and employment laws. We require the same commitment to compliance with labor and employment laws by our suppliers.

Conflicts of Interest

USF expects business decisions to be made objectively and not only in our best interest, but also in the best interest of our customers. Any situation that creates or appears to create a conflict between personal interests of USF employees and the interests of USF must be avoided. For example, a conflict of interest may arise when USF is doing business with a supplier that employs, or is partially or fully owned by, a USF employee or family member of an employee. USF manages these conflicts by requiring its employees to disclose any relationship that could be perceived as influencing business judgment.

We similarly expect our suppliers to disclose or otherwise confirm the disclosure of any relationship between the supplier and USF employee which may create or appear to create a conflict of interest.

Disclosures or concerns regarding conflicts of interest should be directed to **compliance@usfoods.com**.

Gifts, Meals and Entertainment

Note: Information on Sales Contests included in separate section below.
USF' business depends upon productive, successful relationships with suppliers and customers. We recognize that modest, sensible gifts, meals, and entertainment may be a normal part of doing business. However, we must ensure that decisions relating to suppliers and customers remain

completely objective and avoid real or perceived conflicts of interest. Suppliers must follow these guidelines when providing any item of value to a USF employee:

- Employees may accept or provide an occasional meal, tickets to ordinary sports or cultural events, occasional golf outings or gifts, such as gift baskets at holiday time, or other small tokens of appreciation. However, such gifts from or to any one source should not exceed a value of $250 in a calendar year.
- USF employees are required to obtain approval before accepting any gifts, meals, entertainment, or travel from a supplier in excess of $250 per year.
- In general, expenditures for USF employees should be part of a direct business activity, such as travel for a plant tour and lunch served during a meeting. Suppliers should not offer USF employees personal travel, lavish or frequent gifts, meals, or entertainment unrelated to business.
- Gifts of cash or cash equivalents, such as gift cards, are never allowed.
- Gifts that are provided in exchange for reciprocal action ("quid pro quo"), or any items that are illegal, sexually explicit, or otherwise violate our commitment to integrity are strictly prohibited.

Sales Contests

Suppliers seeking to include USF employees in sales contests must obtain approval in advance by contacting the Merchandising/Marketing Department at the applicable division or region. In order to avoid a conflict of interest, maintain control of our business objectives and to comply with tax reporting obligations, USF employees are prohibited from accepting direct payments of promotional fees, incentives and commissions from our suppliers. If a sales contest is approved, payments or prizes must be sent in a lump sum payment for USF for distribution to individual employees, along with appropriate tax documentation

Government and Healthcare Customers

In serving government and healthcare customers, USF abides by federal, state, and local laws that govern conduct between contractors and government employees and between contractors and healthcare entities that receive state funding. Therefore, we have specific restrictions on what our employees may do in relationships with government and healthcare customers.

In such transactions, USF employees must comply with anti-kickback rules which prohibit any quid pro quo and must obtain approval from the USF Compliance Team before transferring anything of value directly or indirectly, to any government official, employee of a government-controlled company, political party or healthcare customer. Likewise, we require that our suppliers also comply with such laws when dealing directly with government and healthcare customers. In transactions involving USF, a supplier must never provide anything of value to a government or healthcare customer on behalf of USF without first obtaining approval from the USF Compliance Team. In addition, USF employees and suppliers acting on behalf of USF must comply with the U.S. Foreign Corrupt Practices Act, as well as all local laws dealing with bribery of government officials.

Business and Financial Records

Both USF and its suppliers must keep accurate records of all matters related to our business together. Examples include the proper recording of all expenses and payments; information provided to USF in the form of responses to inquiries, requests for proposals, and audits; and other documents specific to the relationship. Invoices submitted to USF must be detailed, accurate, and timely.

Food Safety and Quality Assurance

USF has a fundamental commitment to ensuring that its products meet the highest standards of safety and quality. We require all suppliers to provide products and services that meet or exceed government or contractual standards of safety and quality.
USF employees and suppliers must immediately report any deficiencies in product safety and quality so that appropriate product recall or market withdrawal actions may be taken.

Intellectual Property

Intellectual property comprises trademarks, domain names, patents, industrial designs, copyrights and trade secrets. Intellectual property is considered confidential information and USF employees and suppliers have a duty to protect USF' intellectual property, just as they have the obligation to respect that of others.

Suppliers must not use, copy, display, or distribute USF' intellectual property without permission or approval by USF.

Corporate Responsibility and Sustainability

USF strives to be a responsible and sustainable company, improving the quality of life of our customers and other stakeholders, now and in the future. Our goal is to permanently transform the environmental and social performance of the foodservice industry landscape while enhancing competitiveness and profitability for USF and its key strategic supplier partners. We focus on three objectives:
1) Decreasing environmental impacts,
2) Improving social performance, and
3) Building a supplier network focused on customer impact. We expect that our suppliers will engage with us and support a mutual agenda of corporate responsibility and sustainability.

Speaking Up

We expect a commitment to honesty and integrity from all of our employees. We expect the same commitment from our suppliers. Suppliers who have a good faith belief that a USF employee, or anyone acting on behalf of USF, may or has engaged in unethical behavior or conduct in violation of this Code, should report the matter to USF.
The supplier can contact the appropriate manager, Human Resources, the USF Compliance Team (847-720-2570 or **compliance@usfoods.com**), or our 24- hour Check-in Line at 1-888-310-7716. A supplier's relationship with USF will not be affected by an honest report of potential misconduct.

CHANGE LOG:

Update	Supersedes	Summary of Major Changes
January 4, 2018	2013	• Organized to be more consistent with GFSI format to make it easier to find needed information to include changing 'should' and 'shall' to 'must'. • Environmental monitoring programs must follow USDA/FDA published guidance documents and included links • Included links to FDA and FSIS guidance documents for allergen control • Removed details on product labeling and included reference to USF Food Labeling Policy • Removed option to use encryption for code dating. • A GTIN-14 (SCC, ITF-14) Barcode that meets all GS1 guidelines must be printed on two sides of the outer container • All inner packages that meet retail sale requirements must include the UPC barcode. • All manufacturers of Ready to Eat products must have Environmental Monitoring Programs which follow USDA or FDA Guidelines as appropriate • Visitors and contractors must sign a copy of GMPs and appropriate food safety practices that must be observed while in the facility. • Animal Welfare policies must meet the Professional Animal Auditor Certification Organization (PAACO) Minimum Standards for Assessments of Animal Welfare Audits. • Clarified that the supplier will be the importer of record for all imported items
March 13, 2018?????	January 4, 2018	Corrected email address for product recall team to **recallteam@usfoods.com.**