Kraft Heinz
Ingredient Supplier Quality Expectations
Expectations Manual

This document is intended to be used internally and externally.

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INTRODUCTION

At Kraft Heinz, the safety and quality of our products are of the highest importance – as are the trust and confidence of our consumers and customers. The quality and safety of our products is the foundation on which the success of our business is built, and at the core of our heritage. Safety, quality and putting the consumer first are ingrained in our culture.

One of the ways we achieve our commitments to delivering safe, high quality products, is by ensuring the strength of food safety and quality systems both internally and throughout our supply chain. All suppliers to Kraft Heinz must share in our commitment, and for that purpose we have developed this Kraft Heinz Ingredient Supplier Food Safety and Quality Expectations Manual (hereinafter “ISQE Manual” or “Manual”).

This Manual is intended to help current and prospective suppliers to Kraft Heinz of raw materials, ingredients and packaging materials (“Materials”) to ensure that their Food Safety and Quality Systems meet both the standards of the food industry and of Kraft Heinz. This Manual has been developed by Kraft Heinz after a review of product defects, food safety and quality audits of manufacturing locations, and a study of Product Retrievals throughout the food industry. This review led us to identify certain actions, which if executed properly, help to prevent Product Retrievals, consumer complaints, Rework and plant downtime, and help to produce high quality, safe food products. **All Manufacturing Locations producing Materials for use by Kraft Heinz must meet the requirements of this Manual.** This ISQE Manual does not apply to Farm Operations.

This Manual contains the elements that we believe are essential for the effective management of Food Safety and Quality, and Food Defence. These are Kraft Heinz’s requirements. They are not intended to lessen or eliminate any requirements that may be set forth in any contract, specification, or Government Regulations; however, any elements of this ISQE Manual that are more stringent than those set forth in any contract, specification, or Government Regulation shall take precedence. Any questions about the requirements or standards set forth herein should be addressed by contacting the appropriate Kraft Heinz Contracting Representative.

This ISQE Manual should be easily accessible at your Manufacturing Location; however, a copy is also available from your Kraft Heinz Contracting Representative or Procurement contact. The English version of the ISQE Manual is considered the official version, but alternative languages may be available.

Capitalized terms not otherwise defined in text, are defined in Appendix 1 (Definitions).

**General Audit and Inspection Requirements**

All Manufacturing Locations producing Materials for use by Kraft Heinz are subject to audit and approval of Kraft Heinz. The frequency and type of audit or inspection required by Kraft Heinz is dependent upon the type of Materials. Suppliers of Food Contact Packaging materials with ingredient statements printed thereon are also subject to audit and approval.

Separate audits are required for each Manufacturing Location and each production line that may produce Materials for Kraft Heinz. Any audit or inspection conducted by Kraft Heinz shall extend to all areas of the Manufacturing Location, including all pertinent production and storage areas, deemed
necessary to evaluate whether the Manufacturing Location, production line, and/or the Material meets Kraft Heinz’s requirements and specifications. The audit/inspection may include, but is not limited to, review of equipment, finished and unfinished materials, containers, labelling, records, processes, and controls. The supplier must implement all corrective actions identified in the Kraft Heinz audit within the time frame agreed in the audit corrective action plan. Verification of corrective actions for all critical and major findings shall require follow up.

Suppliers must permit Kraft Heinz and/or its representatives to enter and audit its Manufacturing Locations, including any areas utilized for manufacturing, storing, or supplying of Materials to Kraft Heinz. Kraft Heinz may conduct such audit, either through itself or its third-party representative. Auditors shall not be asked or required to sign confidentiality agreements as a prerequisite to, or at any time during, an audit or prior to requesting information relating to the maintenance of the approval. Auditors checking compliance with this ISQE Manual will not audit nor inspect financial data, sales data (other than that directly related to Kraft Heinz), or pricing data. Auditors will not inspect personnel data, other than data relating to qualifications or training of technical and professional personnel performing functions pertinent to production of Material.

In Kraft Heinz’s sole discretion, Kraft Heinz may accept the audit of a recognized third party industry standard auditor (i.e., the provider of a GFSI certification, which includes a copy of the audit report or executive summary and certificate submitted to Kraft Heinz as part of the approval).

Kraft Heinz’s audit/inspection requirements are prioritized based upon Kraft Heinz’s experience with the supplier and the type of Material produced at supplier’s Manufacturing Location. Audit frequencies are dictated based on material risk. Kraft Heinz utilizes an audit risk assessment process, placing the Materials into an appropriately defined tier on a matrix based upon several risk factors that include, but are not limited to the following: microbial sensitivity, type of manufacturing process, and/or experience with supplier. More sensitive Materials may require an audit by Kraft Heinz, while a third-party audit may be acceptable for less sensitive Materials.

To become and remain an approved supplier of Materials, audit findings must be acceptable to Kraft Heinz, in Kraft Heinz’s sole discretion.

Suppliers must inform Kraft Heinz in advance if it would like to change the production line or Manufacturing Location of Materials, as an additional audit and approvals will be required. It may take three months or more to approve a Manufacturing Location, production line, or changes thereto. Supplier is not permitted to change Manufacturing Locations or the production line for Materials until Kraft Heinz provides its consent. Suppliers shall notify the Kraft Heinz Contracting Representative of any Material which is produced or processed in a plant not entirely owned or operated by the supplier.

**Global Food Safety Initiative (GFSI) Certification**

Kraft Heinz encourages all its suppliers to attain GFSI certification as a best practice; however, based upon the region and the Material to be supplied, Kraft Heinz may require suppliers to be GFSI certified. Current certifications accepted for Materials can be obtained at www.mygfsi.com.
Additional Assessments based on Risk

In addition to audits or inspections performed against the this ISQE Manual, there may be periodic on-site assessments performed by Kraft Heinz personnel or representatives to evaluate the Supplier’s Food Safety and Quality Program, which may include, but is not limited to, thermal processing, aseptic processing, pasteurization, sterilization and regulated processes and validations. These are regularly scheduled assessments based on the discretion of Kraft Heinz’s food safety and microbiology departments.

For Agents / Brokers, Distributors and Traders

In cases where Materials are being procured through brokers, distributors and traders, the broker/distributor/trader must:

- Only buy from Kraft Heinz approved Manufacturing Locations (the location of manufacture of the Materials shall be disclosed to the Kraft Heinz Contracting Representative to assure that Materials are only sourced from locations meeting Kraft Heinz requirements for food safety and quality);
- Notify the supplier that the specific Material will be delivered to Kraft Heinz;
- Ensure this Manual is communicated to the supplier, provide evidence to Kraft Heinz of supplier’s agreement to the requirements of this Manual, and ensure that supplier complies with these requirements;
- Notify Kraft Heinz of any Manufacturing Location changes or production line changes of the supplier (with new sites and new production lines requiring approval prior to use);
- Demonstrate that Materials can be traced to a Manufacturing Location.

Notifying Kraft Heinz of Significant Events

When events occur that could affect food safety, quality, or processing, communication in the supply chain is critical. The supplier must establish standard procedures to ensure that Kraft Heinz is immediately notified of any such event.

The supplier shall notify its Kraft Heinz Contracting Representative immediately if any events occur which could affect food safety, quality, or processing, including, but not limited to:

- Discovery of any quality defect, process control deviation or food safety issue which could lead to a Recall of a Kraft Heinz finished product;
- Discovery of potentially defective or adulterated Materials associated with a product in distribution;
- Identification of the substitution of any Material with an inferior or alternative unapproved ingredient (this may include the dilution or replacement of authentic substances with a non-authentic substance or the addition of an illegal substance such as illegal colorants (e.g., Sudan or Azo dyes), melamine or physical or botanical substitutions);
- Inadvertent Release from Hold of any Material;
- Non-routine Regulatory Authority investigations, testing, sampling, reporting, or other contact or action with the potential to affect Material. Kraft Heinz does not need to be notified of routine inspections, unless the inspection reveals that Material may not be in compliance with applicable laws or specifications;
• Any event that leads the supplier to suspect that a non-conformance (to specifications, Government Regulations, etc.) exists in Material already shipped to Kraft Heinz;
• Product tampering, threat of tampering or misrepresentation of ingredient or Materials;
• Event or substance that could threaten product security (e.g., unintentional contamination by radiation, natural disaster);
• Notification by law enforcement or other authority of a potential product security event;
• Identification of an unlabelled allergen in Material;
• Changes to supplier’s processes and/or Manufacturing Location that could have an impact on Materials (see also, manufacturing changes in the Management Systems Manual in the section below of this ISQE Manual);
• Inability to deliver Materials that meet Kraft Heinz’s specifications;
• Any of the supplier’s Manufacturing Locations loses GFSI certification.

The supplier must notify Kraft Heinz by a phone call with a live person and by email. A voicemail, even coupled with an email, is not adequate. The Kraft Heinz Contracting Representative shall be the primary contact for any contact or notification required by this Manual.
FOOD SAFETY AND QUALITY SYSTEM CONTROLS

Food Safety and Quality Policy

The supplier must maintain a clear, concise and documented food safety and quality policy statement authorized by its senior management, setting forth measurable objectives, specifying the supplier’s commitment to the safety and quality of its products, including Materials, and setting forth its commitment to continuous improvement. The food safety and quality policy is to be reviewed on an annual basis to ensure that it remains appropriate and meets the needs of its organization. The policy must be effectively communicated to all levels of the supplier’s organization.

Quality Management Systems

In addition to the food safety and quality policy, the supplier must have implemented a documented Food Safety and Quality System (including but not limited to its Manufacturing Locations), that at a minimum, ensures compliance with this Manual, Kraft Heinz’s specifications for the Materials, and compliance with all applicable regulatory requirements of the production country and the destination to which Materials will be delivered. The supplier’s Food Safety and Quality Systems are to be reviewed regularly by the supplier to ensure relevance and completeness.

In addition to the requirements set out above, the supplier’s Food Safety and Quality System must specifically include controls to ensure that:

- Any outsourced process that affects Materials produced for Kraft Heinz shall meet the same requirements of the supplier’s Food Safety and Quality System, and any outsourced process must be managed by the supplier;
- The supplier notifies Kraft Heinz of its intention to make any change that may affect the safety, quality, security, shelf-life, ingredient statement, Allergen Profile, packaging, nutritional labelling or functionality of Materials – such as changes in Material formula, raw materials, production line, Manufacturing Location or process – and any change shall be approved by Kraft Heinz before being implemented. Kraft Heinz must be notified of such changes in writing in advance, preferably with at least six months’ notice; and
- Supplier maintains complete and accurate books, records, and documentation relating to the sourcing, production, storage, and transport of Materials

Control of Documents and Records

The Supplier must have implemented procedures for managing and controlling all Food Safety and Quality System documentation and records. The Food Safety and Quality System must clearly identify the records to be maintained to show effective implementation, and controls needed for identification, storage, protection, retrieval, retention and disposition of records.

Records must:

- be accurate, permanent, legible and complete;
- be kept as original records, true copies or electronic records;
- contain the actual values and observations obtained during monitoring;
be created at the same time the activity being documented occurs (i.e. real time) and be as
detailed as needed to provide an accurate history; and
include (i) the name and location of the Manufacturing Location; (ii) the date and time of the
activity documented; (iii) the signature or initial of the person performing the activity; and (iv)
where appropriate, the identity of the product and the production code.

Proper procedures must be utilised for making corrections. The use of pencil, “white out correction
fluid”, pre- or post-entering of data must not be permitted.

Records relating to Materials delivered to Kraft Heinz shall be retained for at least five (5) years after
delivery of such Material to Kraft Heinz, unless a longer period is required by applicable Government
Regulations, or unless otherwise agreed with your Kraft Heinz Contracting Representative.

Risk Assessment (HACCP)

Materials supplied shall be designed, produced, and distributed using HACCP (Hazard Analysis Critical
Control Points) principles to minimize food safety risks systematically. The supplier shall maintain and
implement a documented HACCP/food safety plan, as described by the Codex Alimentarius HACCP
principles.

The HACCP/ food safety plan must include (at a minimum):

- Critical control points (CCPs)/ Preventive Controls (PCs)
- Prerequisite programs (if applicable)
- Critical limits/parameters
- Monitoring activities
- Corrective actions and responsibilities
- Validation of critical limits and controls
- Verification procedures
- Recall plan (covered in crisis management for suppliers not supplying North America (non-
  FSMA vendors))
- Record keeping

The supplier shall have a cross-functional HACCP/food safety team, which team’s responsibilities
should, at a minimum, include developing, modifying, implementing and maintaining the HACCP/food
safety plan. The HACCP team shall ensure that each HACCP plan and its implementation is properly
verified and validated on a regular, documented basis.

Hazard analysis must be conducted prior to developing the HACCP/food safety plan. If the HACCP/food
safety team has identified that there are no CCPs/PCs in the process, a risk assessment must be
completed and pre-requisite programs identified. A process flow diagram must be developed, which
includes all processing steps for all applicable Materials/lines. PCs must be implemented according to
the HACCP plans. CCP/PCs must be defined and validated to ensure that they are capable of controlling
the Hazard.

The HACCP/food safety plan(s) must be reviewed if there are changes to Materials, processes, raw
materials, packaging etc.
Personnel of the supplier must be able to demonstrate their knowledge of and conduct specific actions regarding procedures identified in the HACCP/food safety plan that are under their area of responsibility.

HACCP/food safety systems must be implemented accurately as dictated by the HACCP/food safety plan.

Data demonstrating effective processing (capable processing) must be made available to Kraft Heinz, upon request. The supplier’s Food Safety and Quality System must include on-going verification of HACCP effectiveness conducted at a minimum frequency of every year for plans with CCPs, three years for plans without CCPs (or more frequently if dictated by local legislation) or validation when a major change occurs.

**Compliance with Government Regulations (Legal and Other Requirements)**

The supplier’s processes, procedures, Materials, Manufacturing Locations, and record keeping must comply with all applicable Government Regulations.

The supplier shall have written procedures and designated trained personnel to manage inspections by and contacts with Regulatory Authorities, with such procedures addressing how the supplier will follow up and obtain closure of any issues arising from such inspection or contact. The supplier shall maintain at its Manufacturing Location records of all regulatory inspections and contacts, including any reports issued by inspectors, Manufacturing Location responses, and corrective actions taken, for a period of five (5) years, or if longer, according to applicable regulatory requirements.

In the event a Regulatory Authority takes samples of a Material produced for Kraft Heinz, the supplier shall contact the Kraft Heinz Contracting Representative. When any such samples of Materials are taken by Regulatory Authority, the supplier must take and retain duplicate samples of Materials from the Lot examined by the Regulatory Authority, and will provide Kraft Heinz with such duplicate sample. No further testing shall be initiated by the supplier without prior authorization of Kraft Heinz.

Whenever an environmental sample is taken by a Regulatory Authority the supplier must take a side by side environmental sample. The Regulatory Authority may sample for zone 1, but the supplier will not take side by side samples for zone 1.

Duplicate copies of any documents given to Regulatory Authorities concerning Material must be taken and retained.

In some cases, it may be necessary to place Material on Hold pending results of sampling. For example:

- Where a non-conformance or defect has become apparent during the inspection by the Regulatory Authority; or
- Where the Regulatory Authority’s stated reason for taking the sample concerns an issue which may impact Kraft Heinz (e.g., the Regulatory Authority took the sample for Pathogen or GMO testing).

Kraft Heinz must be notified immediately if Materials produced for Kraft Heinz do not meet regulatory compliance or if there is any enforcement action taken by a Regulatory Authority such as the U.S. Food
and Drug Administration, United States Department of Agriculture, or the Canadian Food Inspection Agency.

Continuing Pure Food Guaranty (Suppliers shipping to the United States only):

Suppliers of food products (including finished food products, food ingredients, and Primary Packaging materials) that will be used in the manufacture or sale of products in the United States is subject to a pure food guaranty to be provided by Supplier (as provided in the U.S. Federal Food, Drug and Cosmetic Act of 1938, as amended and the U.S. Federal Fair Packaging and Labelling Act of 1966, as amended). Upon the request of Kraft Heinz, Supplier shall sign pure food guarantees provided by Kraft Heinz which are generally consistent with the aforementioned law and regulations.

Objectives and Improvement Plans / KPI Review

On a regular basis, Supplier’s senior management shall review its Food Safety and Quality Systems, its Food Safety Quality Programs, industry best practices, and quality based data (including but not limited to internal audit results, corrective actions, and follow-ups) with the objective of continuously improving its food quality, safety, and defence. These reviews are to be documented and key performance indicator metrics are to be established and monitored to drive continuous improvement efforts.

Roles and Responsibilities

Senior supplier management must provide evidence of their commitment to establish, implement, maintain and improve its Food Safety and Quality System and must determine and provide, in a timely manner, all the resources needed to implement, maintain and improve such system.

Each job function at a Manufacturing Location must be documented. Job descriptions for those working at a Manufacturing Location must include the job’s training requirements and training methods with responsible parties for such training identified. An organizational chart and job descriptions for each Manufacturing Location must be in place which define who in the Manufacturing Location has authority and accountability for food safety and quality. Supplier management must ensure that responsibility for any regulatory processes is assigned to designated employees and that those employees have sufficient knowledge and expertise to manage such responsibility.

Training

All food handlers must be trained annually in glass control, GMPs including food hygiene, allergens (plus any other category of raw material requiring segregation – e.g. GMO, organic) and HACCP/food safety. Trainings are to be appropriate to individual job functions, for example: hygiene operators must be trained in the hygiene program, employees handing and using chemicals must be trained in the handling and use of chemicals, and personnel responsible for Calibration must be trained (e.g. laboratory employees).

New employees, including temporary and seasonal workers, must be trained. Training elements should be defined and be commensurate with the activity and operator competence. Training must be provided to new employees before starting work in production or handling Materials.
Training sessions must:

- Be scheduled and the frequency, content and attendance at such training sessions must be maintained on file (e.g. training matrices);
- Where appropriate, be multilingual;
- Be conducted by authorized personnel, with designated trainers identified and suitably trained; and
- Be verified to be effective;

Employees monitoring CCPs/PCs must receive further specific training on monitoring, documentation, verification, and corrective actions to take if critical limits are not met.

Refresher training shall be provided at least annually and immediately following procedural changes. The supplier shall maintain records of personnel education, training, skills and experience.

The supplier shall provide visitors and contractors with site specific training programs, as necessary, prior to performing activities which may affect safety or food safety and quality.

**Change Control**

The supplier must have documented procedures must be in place to control changes, including but not limited to changes related to the Manufacturing Location, processing, ingredients and packaging, so that there is no safety or quality risk likely to affect the Materials. This includes all temporary and permanent changes.

Risk assessments regarding changes are to be completed and retained by the supplier, and the supplier personnel responsible for the process must sign off on the changes as presenting no additional risk to compliance with Kraft Heinz’s specifications, Government Regulations, or this Manual.

The HACCP plan and any applicable Food Safety Quality Programs should be reviewed in the event of any change that may impact the Material or production of the Material. Such a review shall evaluate the need for changes to the food safety system, including the food safety policy and food safety objectives.

Records must be retained of changes made to processes, equipment, and of certificates of conformance received from the equipment suppliers. Food safety and quality personnel at the Manufacturing Location must sign off on any changes that may impact the Material or production of the Material.

The change control process must be documented, implemented and maintained. This process must include as a minimum the requirements to:

- Determine the need for change and the control of change;
- Document the proposed scope of change;
- Initiate a review of associated risk assessments and standards;
- Assess the risk to identify the controls required;
- Approve the change by authorized people;
- Prepare and implement the change and approved controls;
- Review and update documentation;
Communicate the change;
Retain change control records

**Performance Monitoring / Internal Audits**

The supplier shall establish, maintain, and comply with written procedures for conducting internal audits to verify whether its Food Safety and Quality System and its Food Safety Quality Programs, including the relevant content of this ISQE Manual, are adequately implemented. The internal audit program shall ensure that each function /area is audited at a defined frequency.

Results of previous audits must be taken into account when planning future audits. Employees may conduct audits, but should only be assigned to audit areas in which they do not work. The audit procedures shall provide for follow-up audit activities to verify and record the implementation of corrective actions taken. The effectiveness of the corrective action shall be verified and additional actions must be implemented where necessary. The audit must be completed and closed-out within an established timeframe.

Procedures must be in place for complaint handling, and must include both quality and service related complaints.

**Crisis Management, Incident Reporting and Investigation**

The Manufacturing Location must have a documented crisis management program, going beyond just product Recall, and to include provisions of supply contingency and emergency contact information of the supplier.

The crisis management program must clearly define what constitutes an incident, subject to the crisis management program. Personnel must be made aware of this program so as to take appropriate actions in the event of such an incident. Incident reports must be written following each incident.

Incident reports must include:

- Identification of the issue; and
- Details from the investigation, and findings of the root cause.

Upon an incident, the Manufacturing Location shall have a corrective action and preventative action (CAPA) program to ensure that non-conformances or incidents are addressed in a timely manner. The CAPA must include:

- Defining the issue;
- Root cause analysis;
- Register of actions;
- Verification of effectiveness;
- Identification of long-term solutions;
- Periodic review of CAPA by the management team;
- Evaluation of affected raw materials, ingredients, or packaging; and
- If the raw materials, ingredients, or packaging is determined not to be safe, steps to prevent from entering commerce.
The CAPA program must also include procedures for analysis of effectiveness of corrective actions taken for, at a minimum, each of the following:

- Out of specification process or product;
- Products found to deviate from critical limits of a CCP;
- Customer/consumer feedback, including complaints;
- Failure to meet external, regulatory or customer requirements;
- Issues arising from internal audits, external audits, and regulatory inspections/contacts;
- Product Retrieval; and
- Supplier performance measures.

The Kraft Heinz Contracting Representative shall be notified immediately in the event of a Product Retrieval that may impact Kraft Heinz.
FOOD SAFETY AND QUALITY OPERATIONAL CONTROLS

New Products, Packaging and Processes

Supplier must have documented and implemented procedures in place to ensure that any new process, raw material, ingredient, or other product or packaging comply with applicable Government Regulations.

Evidence must be available that all Food Contact Packaging complies with legislation applicable in the country of sale. Packaging must not alter product organoleptic characteristics and shall not be a source of foreign material. Staples or metal objects of any kind shall not be used on packaging or on the pallet. All plastic bags or liners in direct contact with materials must be of a different colour than the material itself.

Packaging materials must be appropriate for the specific food product being shipped, and must not impart odour, flavour or taste to a specific food product being shipped. Additionally, for shipping to the United States, packaging materials must meet U.S. Food and Drug Administration regulations for “indirect food additives.”

Any proposed change in the size or type of packaging must be submitted to the appropriate Kraft Heinz Contracting Representative for approval prior to modification.

Specification Approval and Maintenance

The Supplier must evaluate, control and maintain all Kraft Heinz Material specifications, which will be reviewed at a frequency agreed upon with Kraft Heinz.

Any changes to Kraft Heinz’s Material specification must be approved by Kraft Heinz in writing. Appropriate personnel (including at the Manufacturing Location) must have access to the latest specifications for Materials supplied to Kraft Heinz.

The supplier must deliver Materials that meet the Kraft Heinz specifications. If the supplier anticipates that it will not be able to meet the specifications, the Kraft Heinz Contracting Representative shall be notified immediately.

If Kraft Heinz’s specifications for Materials require particular certifications, such as organic, GMO, vegan, vegetarian, Kosher or Halal, then the Manufacturing Location must be certified by an appropriate certifying body of the country in which Kraft Heinz will receive the Material.

Specific testing methods are described in the Kraft Heinz specifications. When the supplier uses a different method, a validation study must have been performed in order to guarantee an equivalent output.

Where the specification requires Certificates of Analysis (COA), the COA shall include the following information as a minimum:

- Laboratory name, address and accreditation of location performing any Pathogen testing;
- Supplier name, manufacturing site, address, phone number, and contact person;
- Material name, Lot code, production date, and Kraft Heinz identification number;
- Specification number (or purchase agreement) and issue date;
- Test and analysis results for each Lot, preferably including Kraft Heinz specification target and range;
- Parameter being tested, test method, sample size and date of test; and
- Signature of qualified person approving the test and date of approval.

The COA should be written in the local language of the receiving Kraft Heinz plant. Kraft Heinz reserves the right to sample each delivery and to determine the appropriate Disposition.

**Sourcing Approval**

The supplier must have implemented and maintain a documented vendor approval process for ingredients, packaging and services where food safety and quality may be affected. Vendors should have knowledge of the end product use.

The supplier may only source materials, ingredients, packaging, and services from vendors who also have implemented a documented Food Safety and Quality System designed to manage quality, food safety and food defence similar to the criteria outlined in this Manual. Any such program must include a risk assessment and audit by the company, GFSI, or third party auditor.

The approval process for high risk ingredients where there may be concerns regarding illegal colorants, GMOs, Pesticides and Allergens must include the ability to trace back through the supply chain to source.

Suppliers shall monitor its suppliers’ performance and compliance with quality requirements, and the Kraft Heinz specifications, and provide feedback with respect to performance to such suppliers.

A list of “approved vendors” of suppliers should be utilized for all ingredient, material, packaging and services; however, vendors may only be approved on a “Manufacturing Location” location (as opposed to organization wise). There shall be an emergency plan for accepting goods from a non-approved vendor.

For suppliers in the United States or shipping to the United States, the stage at which Hazards are controlled within the supply chain must be established and a documented supplier verification program must be in place that stipulates the audit frequency appropriate for risk control.

**Utility Quality and Testing**

The supplier shall have a documented program implemented to ensure the safe provision of utility services in Production Areas. Utility services include environmental air, compressed air, water, steam, and centralized hydraulic systems.

The supplier shall control access points for the above referenced utility services, as well as electricity, heating, and ventilation. Access may be controlled by any means deemed effective, such as locked facilities which only authorized employees can open. Applicable corrective action limits shall be defined and followed for non-compliance with such programs and for all out-of-specification test results.
Environmental Air

- Where appropriate, air quality shall be monitored, trended and reviewed by appropriate personnel, as necessary to ensure suitable microbiological quality. The supplier program must include monitoring in Production Areas with exposed Microbiologically Sensitive Materials that will not receive a subsequent kill step. Corrective action shall be taken for out of standard results.
- The integrity of air filters shall be checked as part of regular preventive maintenance.
- The supplier shall maintain suitable air pressure differentials between adjacent areas with different microbiological sensitivities in relationship to positive, negative or ambient airflow to prevent product contamination.
- Exterior air intake ports shall be examined periodically for physical integrity;
- Air for a Production Area shall not be sourced from an unprocessed product area (raw); and
- Air blown on the surface of Microbiologically Sensitive Materials shall be sourced from within the Production Area.

Compressed Air

- Compressed air for general applications, to include ingredient, product contact, non-product contact, and packaging, shall be dry, oil free and filtered to remove foreign particles.
- Compressors that provide air for direct or indirect product contact shall be of oil free design. Where air from existing oil lubricated compressors are used for direct or indirect product contact, the following requirements apply: only food grade oil shall be used, vapour and odour filters must be installed prior to use where possible, and filter changes shall be managed by maintenance.
- When used as an ingredient, or in contact with Microbiologically Sensitive Materials, or their packaging, or in contact with product contact surfaces (e.g., during cleaning), compressed air shall be filtered at the point of use and dried to prevent condensation within the pipelines.

Water

- The potable water supply system (including ice that contacts the product) shall meet all applicable local, state, national, and international regulatory requirements.
- The Manufacturing Location shall have effective programs to control water microbiological Food Safety and Quality and to verify that water meets specified requirements. Microbiological and other test data from water testing shall be reviewed by appropriate personnel. Corrective action shall be initiated, completed, and documented for out of standard results.
- Microbiological tests shall be performed periodically. Each point shall be covered at least once per year and each time after maintenance or repair.
- Water used as an ingredient, processing aid, reclaim water, hand wash water, for brine solutions, and as sanitation final rinse shall meet specified Food Safety and Quality and microbiological requirements relevant to the product.
- Disinfection (e.g., chlorination, ozonation, UV light) of surface and well (ground) water is required for all direct product uses (e.g., ingredient, sanitation, rinse, drinking) and indirect product uses (e.g., re-circulated cooling water, hand wash). Residual chlorine and ozone must
be periodically tested. Corrective actions shall be taken when levels do not meet the required limits.

- The Extraneous Matter risk in incoming water needs to be controlled using filters when needed (e.g. well water).
- Filtration systems (e.g., charcoal, reverse osmosis) shall be regularly inspected and maintained. Water systems must not have cross connections between treated and untreated supplies. Incoming water lines must be fitted with one way valves or a header tank.
- For surface or well water sources, a visual turbidity assessment shall be carried out at a defined frequency. Testing shall also be carried out following any event which may adversely affect turbidity, such as abnormally heavy rain or flooding.

**Steam**

- Steam shall be of the appropriate Food Safety and Quality and purity to meet process and usage needs
- Culinary steam or clean steam is suitable for direct product contact and can be directly injected into the product without a subsequent rinse or primary packaging if filtered and delivered through stainless steel pipework that meets AISI 304 and 316 specifications.
- Culinary, clean and process steam condensate Food Safety and Quality shall be routinely evaluated for turbidity, off flavours and particulates at a frequency to demonstrate sufficient control.
- Where process steam is used for product contact applications it must be delivered from a boiler system treated with approved food grade chemicals.

**Laboratory Management**

Laboratories must be separated from Production Areas. At a minimum, laboratories should be in a separate room with a door. Additional separation requirements may apply to microbiology laboratories, so please contact your Kraft Heinz Contracting Representative if utilization of a microbiology laboratory is required. Consideration should be given to measures for preventing risk of product contamination from laboratory glassware.

Laboratories used to test in-process and/or product test Pathogens and any other parameters that are critical to the confirmation of food safety must ensure that such analyses are accredited to standards equivalent to ISO 17025.

For all other testing, there shall be procedures in a written program that is accessible to personnel responsible for conducting testing or monitoring. This shall include:

- Laboratory methods manuals;
- Raw material, packaging, or product specifications;
- Test requirements and parameters; and
- Laboratory procedures

Testing and monitoring programs shall be based on generally recognized methods or test methods that have been approved by Kraft Heinz for the intended use.
Procedures must be in place for the identification of samples submitted to the laboratory to assure traceability from the sample to the reporting of a final result.

If Pathogen testing is conducted, the following must be in place:

- Chemicals and microbiological stock cultures not in immediate use are secured with access limited to authorized personnel;
- The microbiological laboratory air is filtered to the minimum requirements;
- Controls are in place to track and dispose of sensitive materials within the laboratory;
- Potentially infectious materials must be sterilized prior to disposal (materials for Pathogen testing);
- The laboratory must be maintained under negative pressure with relation to the adjoining rooms; and
- Each Lot of material that is Pathogen tested must be sampled randomly across the Lot.

Through procedures in a written program, the supplier shall ensure that personnel responsible for conducting testing or monitoring (in connection with the programs required in this ISQE Manual) have access to all necessary information, such as laboratory methods manuals, raw material specifications, packaging specifications, Material specifications, test requirements and parameters, and laboratory procedures, in order to be able to properly carry out their responsibilities with respect to Materials produced for Kraft Heinz.

For suppliers based in the U.S, all supplier plant laboratories and laboratory personnel shall comply with the U.S. Federal Drug Administration’s Good Laboratory Practice requirements.

**Facility Security and Food Defence**

The Manufacturing Location must have a documented food defence program beyond product Recall. This program shall include:

- Emergency contact information of the supplier and Kraft Heinz;
- A plan that explains the Manufacturing Location’s procedures and strategies;
- Clearly defined personnel roles and responsibilities;
- Procedures for reporting threats or acts of intentional contamination to Kraft Heinz; and
- Annual vulnerability self-assessments and procedures for fixing gaps

Food security and Good Manufacturing Practice (GMP) policies and procedures must be reviewed with contractors and visitors prior to access to the Manufacturing Location.

Suppliers acting on behalf of Kraft Heinz that manufacture, process, pack, or in any way handle raw materials, ingredients, or packaging must develop specific procedures to secure product, to deter and prevent intentional contamination, and have protocols in place to quickly and accurately identify, respond to and contain threats or acts of intentional contamination. Likewise, suppliers will ensure their vendors adopt similar protocols and implement appropriate controls.

The supplier shall formally assess the vulnerability of their supply chain to economically and maliciously motivated adulteration and shall apply appropriate measures to mitigate any risks identified. The vulnerability assessment shall be reviewed at least annually, or in the light of new
information regarding risk to the supply chain. Records shall be maintained of supply chain vulnerability assessments and any corrective actions taken.

Requirements for a Food Defence program applicable to all suppliers:

1. Program Administration
   (a) A documented plan that explains the site’s Food Defence procedures and strategies.
   (b) Clearly-defined roles and responsibilities for maintaining the program.
   (c) Procedures for reporting threats or acts of intentional contamination to Kraft Heinz.
   (d) Annual vulnerability self-assessments and procedures for fixing gaps.

2. Access control - a system which will deter people with the intent of harming our products from gaining access to do so. The system shall include procedures to identify people who are regularly on site (e.g., employees and contractors) and to limit access to restricted areas to authorized people only. Specifically:
   (a) Processing and manufacturing areas.
   (b) Ingredient and raw material storage areas (to include packaging stocks).
   (c) Hazardous and chemical storage areas.
   (d) Shipping and receiving areas.

3. Background Screening. Suppliers will conduct background screening checks on employee candidates as required under the contract with Kraft Heinz (except where prohibited under local regulatory authority).

4. Shipping and Receiving. The supplier shall take deliberate steps, and implement procedures, to monitor and verify the integrity of incoming and outgoing shipments.

For suppliers located in the United States or shipping product to the United States, the U.S. Food and Drug Administration facility registration must be completed and maintained if applicable.

Pest Control

The supplier shall have a documented pest control and prevention program implemented to monitor and control pest activity in the Manufacturing Location and the surrounding area effectively.

- Frequent inspections of the Manufacturing Location and the surrounding area should be conducted frequently;
- Pest activity log and analysis of records for trends in activity
- Individuals involved in executing or managing the program must have appropriate training
- There must be no evidence of pest activity that presents a risk to Kraft Heinz Materials
- The Manufacturing Location must have a complete map of all pest control devices that is present and up to date.
- If pest control is contracted out to a third party, only competent, licensed and insured companies shall be used.

Exclusion shall be the first line of defence and primary method of controlling pests. Building exterior must be protected from rodent and other pest entry including:
- Doors, windows, and screens must fit tightly;
- Doors must be kept closed;
- High grass and weeds around the Manufacturing Location or in adjacent areas must be eliminated where possible;
- Items such as scrap, pallets, pipe, and drums, shall not accumulate on the grounds or parking lot;
- All openings on wall and roof penetrations must be screened to prevent pest ingress;
- Pipe openings through Manufacturing Location walls must be sealed; and
- Product pipes must be capped when not in use.

Electronic fly killing units must not be sited directly over exposed product, including stored pallets of raw materials and finished goods and shall be kept clean and free of accumulation of dead insects and debris.

Electronic fly killing unit tubes must be shatterproof and changed at least annually to remain effective. Logical timing of renewal must be apparent (e.g., at the onset of warmer weather).

Pheromone traps must not be sited directly over exposed product, must be dated, and must have a timetable for change.

Deficiencies, corrective actions and preventative actions that are taken must be documented.

“Restricted Use” pesticide applications must be performed by a certified pesticide applicator or a licensed pest contractor or under the direct supervision of the same.

The supplier shall maintain and enforce written procedures for the application of Pesticides that includes:

- Documented pesticide lot number;
- All pesticide labels and safety data sheets or equivalent material addressing safety precautions shall be available at the Manufacturing Location where the pesticide is used;
- All environmental protection agency registration numbers shall be maintained and available at the Manufacturing Location where the pesticide is used;
- Disposal of unused Pesticides and of empty pesticide containers must comply with applicable regulatory requirements;
- Baits shall be used in situations where a specific pest is the target;
- Bait stations shall be of solid construction, tamper resistant, and securely anchored to the ground or building;
- Rodenticides used must be in block or gel type form only: granular, pellet or powdered form shall not be used;
- All chemicals used in pest control must be accurately labelled and stored securely; and
- Forbidding the use of toxic bait in internal production and food and primary packaging storage areas, even where those storage areas are external to the Manufacturing Location.
Personal Hygiene

Employees must follow good hygiene practices to prevent contamination. The supplier must maintain a documented policy that addresses hygienic practices, which is communicated to all employees, visitors, and contractors. Signs supporting GMP must be posted appropriately and be in the applicable employee language(s).

Personnel Practices

In addition to those the supplier forbids, the following actions are not permitted in GMP areas:

- Eating, drinking, and chewing gum;
- Wearing false eyelashes, false fingernails and/or fingernail polish;
- Expectorating (spitting) in Production Areas;
- Wearing watches, bracelets, earrings, necklaces, or other jewelry (including ornaments or piercing in exposed body areas such as the tongue and/or nose) (plain wedding bands are permitted to be worn by employees who do not handle or work in the proximity of exposed product);
- Use of tobacco products; and
- Use of strong perfumes / aftershaves.

Hands

- Personnel working in GMP areas must wash hands at the following times: before entering a GMP area; upon re-entering the GMP area; after each visit to the toilet facility, rest room, and/or lunch and break room facilities; prior to touching product or product contact surfaces; or any time when hands have become soiled or contaminated.
- Personnel working in a microbiologically sensitive area must sanitize their hands after proper washing and after touching non-product contact surfaces. If soil is observed on hands, hands must be washed prior to re-sanitizing.
- Personnel with minor cuts or injuries on hands must be able to protect the wound and keep it clean and free from infection. They will be allowed to work on production lines provided the cuts are bandaged and covered with an impermeable sanitary material. Adhesive bandages must be highly visible and metal detectable.

The location and design of waste bins, toilets, and hand washing, drying, and sanitizing facilities shall be adequate to comply with GMPs.

All hand wash stations must be located in appropriate Production Areas and equipped with non-hand operated taps. Hand-washing stations must be stocked with soap.

Suitable drying devices and foot/hand sanitizers shall be provided, where applicable. Where hand dips and/or foot baths are used the sanitizer concentration must be checked and maintained at appropriate levels.

The location and number of hand washing, drying, and sanitizing facilities provided shall be adequate for the location and number of employees in the Manufacturing Location.
Hot and cold water, soap/sanitizer, hand drying facilities and a waste bin must be available at hand washing and cleaning stations.

Separate sinks and cleaning stations must be provided for hand washing, food contact equipment cleaning, and the disposal of waste water.

The location and number of toilet facilities shall be adequate for the number of employees in the Manufacturing Location, and each Manufacturing Location must include hand washing and drying facilities.

Toilets and shower facilities shall not have direct entrances to Production Areas.

Toilets shall have a flushing mechanism and be of appropriate design to prevent contamination of employees’ clothes and shoes.

Personal belongings must not be taken into production and warehouse areas.

Eating of foodstuffs, including cough sweets and chewing gum, and chewing and smoking of tobacco products and e-cigarettes, must not be permitted in production and warehouse areas. Areas where such activities are permitted must be documented.

There must be designated areas within the site for food storage and consumption. The storage conditions must be suitably controlled for the type of food being stored.

The supplier shall establish instructions which include provisions for recognition and identification of symptoms of employee illness or communicable disease such as, but not limited to: diarrhoea; vomiting; open skin sores; boils; fever; dark urine; jaundice or any other symptoms associated with geographical, region-specific diseases as defined by local medical experts.

Instructions for management of illness and communicable disease shall be available and communicated to all applicable personnel. The instructions shall at a minimum include:

- instruction that no person shall be admitted into a GMP area if she carries or has been exposed to a potential source of microbial or viral contamination;
- Information for recognition of symptoms of communicable disease as well as symptoms associated with region-specific diseases as defined by local medical experts;
- A process to evaluate the potential impact to product should an active employee be diagnosed with a communicable disease;
- Procedures to ensure that employees afflicted with a communicable disease are removed from the Manufacturing Location or are reassigned to a non-food contact area.; and
- A written medical certification of recovery must be obtained prior to employees returning to work in a direct product contact function.

Note: Local regulations, customs and practices concerning what information employees can be required to provide vary significantly from country to country, must be respected, and may vary the requirements herein. In those cases, where employees with a disease communicable via food have made information about their illness available to the supplier either voluntarily or in response to permissible questions, these criteria may need to be varied. In all cases the employee’s right to confidentiality of the information provided shall be respected.
Protective Clothing

Supplier must maintain a documented policy on the use and correct wearing of protective clothing during production, rest periods and visits to the toilets.

- Employees who work in GMP areas must wear only company-approved clothing, at all times, and anyone entering and/or working in GMP areas must comply with the clothing policy. Protective clothing must be designed and maintained in a manner so as not to be a foreign material risk.
- Individuals must not be permitted to move freely from one type of process area to another without a garment change where the possibility of cross contamination exists.
- Protective clothing worn by employees in identified “sensitive” food areas must differ from those worn in other areas (e.g., different microbiological or chemical risk). If protective clothing has outer pockets above the waist, they must be sewn shut. Fastenings must be secure and detectable by site controls (e.g., metal detection, x-ray).
- Shoes worn in GMP areas should be fully enclosed, made with leather or vinyl outer materials and maintained in hygienic condition.
- Employees must be allocated sufficient garments to be able to wear a clean set at the start of each shift.
- Garments must be changed if they become heavily soiled during the shift. Laundry of protective clothing must be undertaken and controlled by the company, not by the employee.
- All employees must wear, in an effective manner, suitable, company provided, hair cover protection, in areas where food, products, packaging and ingredients are exposed.
- Use of beard restraints - if beard restraints are not worn, there should be evidence of risk assessment to support this decision. If worn they should cover all facial hair.
- Hair restraints and beard restraints must be of a fine gauge mesh or solid material so that all hair is encapsulated. If safety or bump helmets are used, they must be worn over appropriate hair restraints.
- Gloves, if used, shall be maintained in an intact and clean condition. There must be a documented glove policy with associated procedures for glove control. The types of gloves permitted in production must be documented.

Building and Fabric Maintenance

The upkeep of the Manufacturing Location must be acceptable to prevent contamination with a documented process in place to identify and repair in a timely manner any defects that may arise.

- Walls, floors and ceilings shall be free of cracks, holes, openings, and pest entry or nesting areas.
- Floor drains shall be accessible and cleanable. Floors shall be sealed, in good repair, sloped adequately to avoid standing water, and pitched to a drain. The wall/floor juncture should be concave.
- Ventilation must be adequate to prevent condensation and transfer of odours.
- Floors, walls, ceilings, overheads and drains shall be cleanable and constructed to resist deterioration from product or cleaning chemicals.
The plant structure shall provide adequate physical separation to prevent any cross contamination (e.g., separating raw and processed, allergen and non-allergen).

All exterior doors shall be self-closing and must form an adequate seal when closed. Loading docks shall be protected to prevent pest entry. Entrance of air shall be limited by vestibules or air curtains as appropriate.

Windows present in Production Areas that can be opened must be adequately screened. Open windows are prohibited in manufacturing areas with exposed sensitive products (i.e., cheese, starter culture, etc.). All vents and fans shall also be adequately screened.

Doors, windows, and other openings shall prevent access by unauthorized people.

Manufacturing Location grounds must be maintained to address Food Defence considerations.

Grounds and car parks should be maintained in a condition that protects the food and/or Manufacturing Location against contamination.

The grounds on which the Manufacturing Location sits must be graded to drain water away from the building in which production occurs.

Operational Manufacturing Practices

Suppliers must identify and control all areas that relate to food manufacture. These areas and controls should be established, documented and enforced by the supplier. A GMP program must be established and documented and must include visitors and contractors. GMP standards must be clearly defined and communicated.

- GMP training must be documented and records of such training must be retained.
- GMP self-audits should be conducted regularly and include timely corrective action.
- Waste must be suitably controlled so that it does not pose a risk to product quality and safety.
- Personnel handling waste must be dedicated (i.e., must not be involved in processed food handling).
- Waste disposal must meet governmental and regulatory requirements and be recycled wherever possible.
- Storage containers must be dedicated (i.e., must not be involved in processed food handling).
- Walkways and ladders must be appropriately sited and protected.
- The use of staples, drawing pins, paper clips and similar items must not be permitted in Production Areas or in areas with immediate access to production.
- Knives must be controlled on site, snap-off blades must not be permitted.
- All items shall be stored to avoid direct contact with the floor or walking surfaces. The storage area shall be designed to allow maintenance and cleaning, prevent contamination and minimize deterioration.
- Product, ingredient and Rework must be adequately protected and stored in a sanitary manner.
- Ingredients must be adequately protected and stored in a sanitary manner.
- Containers must be properly closed/sealed and/or covered.
- Packaging materials must be adequately protected and stored in a sanitary manner.
- Packaging material shall be covered to prevent contamination (e.g., closures, films).
- Packaging material must be removed from the area during wet cleaning.
Direct product contact packaging must be properly covered and sealed during storage and staging.

**Glass, Ceramic and Brittle Plastic Control**

The supplier must maintain documented and effective procedures for the prevention of glass contamination, breakage and management. The glass breakage procedure must be unambiguous on action that needs to be taken and what product is to be Hold.

- The procedure must include inspection of product, packaging, personnel, personnel protective clothing, equipment and environment.
- The procedure must be reviewed on a regular basis and must identify how utensils that are used to clean up broken glass are controlled.
- The procedure must implement a glass breakage program and glass/brittle plastic register to document details of the location of breakage and the conditions surrounding the breakage. The program shall be audited at a frequency to demonstrate control.
- The frequency of glass, ceramic and brittle plastic items monitoring in site areas must be based on a risk assessment (e.g., high risk areas must be monitored at a greater frequency than low risk areas).
- Lights in food storage and Production Areas must be shatterproof, shielded or sleeved to prevent product contamination in the event of a bulb breaking.

**Calibration**

The supplier must maintain a system for process equipment Calibration, including Calibration of laboratory equipment. Such system must be documented and available in its Manufacturing Locations to all appropriate personnel.

- Where a process is dependent upon a time and temperature profile (e.g., sterilization), the recording devices must be calibrated for both temperature and time.
- Calibration certification must be traceable back to national standards (where they exist) for equipment used to monitor and test CCPs.
- There shall be a master list of all measuring and monitoring equipment that can affect food safety and/or product quality.
- Personnel responsible for Calibration must be appropriately trained.

A documented process on how to calibrate all the equipment on such list must be in place. Such process shall ensure the precision and Accuracy of the equipment such that measurement capability is consistent with the measurement requirements.

Product that may have been affected due to equipment being out of Calibration shall be evaluated. If the equipment is used to monitor or measure a CCP, an assessment shall be carried out to determine any potential food safety risk with regard to product produced when the equipment was possibly out of Calibration.
In-line Product Protection

The supplier must implement a written program to prevent, detect, and control Extraneous Matter in material produced for Kraft Heinz.

As part of the HACCP program the supplier shall perform a risk assessment to determine potential sources of Extraneous Matter, including, but not limited to: raw ingredients, packaging materials, equipment design, plant environment (e.g. ceilings, walls, floors), processing and packaging equipment, utensils, contamination from personnel or other operations such as cleaning and Sanitation, contractor work, Rework/work-in-progress protocol, maintenance or repair of equipment, and historical information of types of Extraneous Matter previously found or reported by consumers.

Periodic reassessments shall be conducted, particularly following changes to the plant environment and instances of non-conformances (e.g., consumer complaints, CCP failures).

Based on the risk assessment, the supplier shall develop an appropriate strategy for minimizing and documenting Extraneous Matter. This will include, but is not be limited to, the design of the plant and the process to eliminate risk, use of devices (e.g. sieves) and practices (e.g., preventative controls) to prevent contamination and the use of detection equipment such as metal detectors and / or x-rays.

Unless bulk products are manufactured the following is expected to be in place prior to filling: a metal detector (3mm FE and SS minimum), x-ray or a sieve (2mm or less). X-rays are required for trimmings and ground products (meat only).

The detection limit for an end-point metal detector / x-ray will depend on type of material, package, and the detection equipment.

At a minimum, metal detectors and/or x-ray machines must be challenged for Kraft Heinz product production runs at the following frequencies:

- Start-up
- After breaks
- After maintenance
- End of run

Records of metal detection and x-ray machines must clearly state test piece sensitivities challenged, time of challenge and operator.

Testing shall ensure both the detection and rejection of contaminated product. Testing shall ensure that rapid repeat rejections are reliably achieved. The minimum frequency for system verification shall be set at a frequency to demonstrate control.

Waste streams of in line product protection equipment must be inspected and the findings of such inspections must be acted upon.

Corrective action must be taken if any foreign material detection device is found to fail when tested or during production; at a minimum, the material produced since the last successful test shall be placed on Hold.
Lines of bulk materials shall place in-line/pipeline metal or x-ray detectors in the product stream immediately or as close as practical prior to where bulk container is filled. For in-line/pipeline detectors, the detection limits must be as sensitive as end of line detectors and must be documented.

Where in-line detection at the filling point is not possible, the detector may be placed further back in the product stream, for example, by using large end of line detectors for large bulk cartons or cases, or using alternative control measures such as inline magnets or fine mesh filters, screens or sieves.

Equipment Maintenance

The supplier shall ensure that equipment and materials used for production are suitable for the purposes intended and in good repair. The supplier must maintain and follow a documented corrective and preventative maintenance program, and be capable of demonstrating such program operates effectively to ensure continuity of supply. The program should include:

- A list of food processing and handling equipment;
- Documented maintenance, employee and contractor safe practices and procedures;
- Maintenance frequencies, and if internal or external responsibility;
- Prioritization of activities that affect food/employee safety and quality; and
- Training for maintenance personnel.

The maintenance program must include routine maintenance documentation and the documentation of emergency or temporary repairs / maintenance.

The maintenance program must include the following:

- A defined PM inspection schedule for screens, filters, air filters, and magnets
- Documented routine preventive maintenance for compressed and make-up air
- In place and documented maintenance, employee and contractor practices
- Records must show sign off at the end of each maintenance task
- An inventory control system to ensure that there is accounting for maintenance parts prior to production commencing
- A procedure to ensure proper cleaning and sanitation procedures and controls for maintenance tools that are moved from raw to cooked product areas
- Temporary repairs and modifications must be controlled and logged with the dates when permanent repairs will be completed
- Appropriate measures to protect products during repair or maintenance activities
- A process to implement appropriate sanitation procedures and controls for maintenance tools that are moved from raw to cooked product area

There should be an effective method of identifying maintenance needs and verifying that maintenance has been performed. Preventive maintenance frequency shall be adjusted in accordance with equipment history and the outcome of the last intervention.

Lubricants and process aids must be food grade for product contact areas. There must be an approved lubricant list and an internal audit must be completed.
If a line does not have downstream detection equipment a more frequent evaluation of wear and condition of product contact equipment shall be in place.

**Material Segregation**

Procedures and product segregation must be adequate to prevent Cross-Contamination, such as Cross-Contamination between raw and processed materials, between different meat species, between different allergens, and between special status items, such as organic, and non-special status items.

The Manufacturing Location must perform a documented evaluation of potential Cross-Contamination sources between Production Areas and/or products. The assessment must be reviewed and updated in the event of changes to plant layout or the addition of new lines.

If the Manufacturing Location is producing materials that are microbiologically sensitive, the Manufacturing Location must have a documented zoning program in place to provide for the effective, physical separation of raw and processed sensitive products. Additionally, an environmental sampling program must exist to monitor Pathogens in areas where post-process contamination could occur, these results must be available to Kraft Heinz upon request.

Any zoning requirement should require defined hygienic zones and documented risk assessment, and should include a map and an outline of preventive controls to maintain separation (i.e., foot foamers, hand washing, etc.).

Control measures such as traffic management, footbaths, management of protective clothing and utility controls must be in place to reduce the potential of Cross-Contamination in micro-sensitive areas.

There shall be suitable air pressure differentials between adjacent areas with different microbiological sensitivities in relationship to positive, negative or ambient airflow to prevent product contamination.

Sufficient space must be maintained at all stages of processing (i.e., raw materials, work in progress and finished products), to ensure that there is no risk of Cross-Contamination.

The zoning program must be periodically evaluated for effectiveness and compliance of zoning requirements including:

- Environmental testing;
- GMP audits;
- Pre-operational and operational inspections;
- Traffic control;
- Physical barriers;
- Infrastructure;
- Utility controls.

All chemicals, including cleaning materials and lubricants, must be controlled and clearly labelled to prevent contamination of the products and must be locked when not in use or when not under supervision. Strong scented materials that can cause odour and taint contamination must not be used.
If the supplier manufactures a microbiologically sensitive material (as defined in Kraft Heinz specification), an environmental sampling program must exist to monitor Pathogens in areas where post-process contamination could occur.

The program shall be documented and include the following:

- Target organism(s) and sampling frequencies;
- Testing methodology;
- Applicable products or processes;
- Swab site locations; and
- The time frame for taking swabs (e.g., shift, midweek, end of week).
- Provision to increase sampling due to any foreseen (e.g. construction, installation) and unforeseen (e.g. overhead leaks) events.

Routine sampling must take place during production, at least 3-4 hours after start-up.

The number of sampling locations for each zone shall be in accordance to the complexity of the site.

Corrective action plans shall address the source of the contamination issue and include mechanisms to verify the effectiveness of corrective actions.

A minimum of three consecutive negative or in-standard results must be achieved prior to returning to the routine sampling schedule. This must be completed within a three-week time frame.

Sampling shall not be done immediately after the sanitation/disinfection measures.

Trend analysis of positive findings shall be made in order to detect areas of concern.

Whenever product contact surfaces are tested for Pathogens, affected product Lots shall be placed on Hold pending the test results. The supplier shall conduct an investigation to identify the potential source and document all corrective actions. They shall also verify the effectiveness of the corrective actions.

The program shall be reviewed at least every two years or whenever a change occurs to the process or product (e.g., new equipment installation, modification or introduction of a new material). This review shall be documented.

The following areas must be subject to environmental sampling:

- Direct product contact surfaces (meaning all surfaces that are exposed to the product during normal equipment operation and all surfaces from which liquids may drain, drop, diffuse, or be drawn into the product or into the container).
- Sites that are indirect product contact surfaces (meaning all surfaces adjacent to direct product contact and all surfaces that could come into contact with direct product contact sites by draining or dripping onto them).
- Non-product contact areas within the processing room that are more remote from product contact surfaces.
- Areas remote from product contact surfaces outside the processing room quiet.
**Allergen Management**

The supplier shall have an effective program to evaluate, identify, and control food allergens to ensure that specific allergens are not inadvertently incorporated as an undeclared component of any product. The information provided by the supplier should allow for an unambiguous determination of the need for allergen declaration in a Kraft Heinz product.

All personnel must be made aware of the site allergen policy. All involved personnel must be equipped with essential information and skills relative to their job responsibilities and the site allergen risk profile.

Procedures must be in place to prevent cross contact of products with an undeclared allergen. The procedures must include process change control (i.e. product line clearance, variety change over controls.)

An allergen assessment shall be carried out as part of HACCP plan development to identify, review, and document allergens likely to be present. The allergen assessment shall consider possible sources of allergens related to the formulation, process, and site-specific practices, including: raw materials/ingredients, processing aids, rework addition and potential for Cross-Contact in manufacturing, storage or shipment practices. The allergen assessment must consider all allergens on the Kraft Heinz Allergen Category List that is on the specification as well as any others identified in Government Regulations. An assessment shall be conducted whenever the source of a raw/packaging material, formula or process that impacts material produced for Kraft Heinz has changed.

Where possible, allergens must be “designed out” of the product, making labelling unnecessary. This may be achieved by reformulation or by avoiding manufacturing Cross-Contact (via proper Rework handling, product sequencing, change-over cleaning or change-over flushing). Avoiding the introduction of allergens through Cross-Contact from other lines (no common equipment) or other Production Areas shall be strictly managed through raw material handling (e.g. use of color-coded utensils and work tools), Rework handling, GMP and employee allergen awareness training. Allergen-containing materials shall be stored in a manner that will prevent Cross-Contact. Rework product containing allergens as an ingredient shall be used only in products which contain the same allergen as an ingredient.

Allergen, cleaning, and sanitation processes of product contact surfaces between line changeovers shall be validated and verified at a frequency to demonstrate control.

Food allergens and sensitizing chemicals applicable to Government Regulations must be clearly identified by the supplier.

Avoiding the introduction of allergens from manufacturing Carry-Over (production of a previous product with allergens in the same line, including the use of common equipment) shall be managed through product change-over practices such as product sequencing, flushing, and cleaning.

Allergens present through manufacturing Cross-Contact or Carry-Over product that cannot be avoided through product sequencing and cleaning due to technical limitations (e.g. nature of product, design of process) shall be properly identified and labelled. Strict control is necessary in cases where different varieties have similar labels. However, the Cross-Contact information shall not be used as a substitute
for an effective food allergen control program. Where Cross-Contact labelling is implemented, all reasonable precautions must still be taken to minimize the risk of Cross-Contact. Producing products containing the same allergens on dedicated lines is preferred if cleaning or other limitations restrict the ability to ensure the line is free of allergens from the prior run.

Controls shall be in place to make sure that Kraft Heinz is notified of all allergens present (as ingredients or traces). Allergen information should be clearly labelled on product being shipped to Kraft Heinz. Where a new allergen is identified in a product where it was not previously present, and is therefore not labelled (e.g., discovery of an allergen Cross-Contact or change to the Allergen Profile of a raw material), Kraft Heinz must be notified immediately.

**Incoming Materials**

The supplier shall ensure that incoming raw materials, ingredients and packaging materials comply with applicable Government Regulations and the supplier’s specifications, including microbiological, physical, chemical criteria, and residue requirements. The supplier shall establish and, upon request, make available to Kraft Heinz, testing requirements, parameters and specified limits to ensure food safety and quality of all raw materials, ingredients and packaging materials.

There must be procedures in place for the release of incoming raw materials, ingredients and packaging materials. A schedule of incoming raw materials, ingredients and packaging materials must include required storage conditions and minimum shelf life.

Inspection or monitoring protocols must be in place for all incoming goods and vehicles.

Chemical, physical and microbiological testing should be in place, where appropriate.

Receiving procedures must include a verification of seals and inspection of other tamper evident devices if appropriate against incoming goods documentation at the time of receipt.

Each delivery should come with the following information:

- Material name;
- Manufacturer's name and manufacturing site address;
- Purchase order number;
- Quantity delivered;
- Manufacturer's batch number;
- Date of manufacture;
- Expiration date;
- Documentation of special certifications (Kosher, organic, Halal, etc.); and
- Allergen status (if applicable).

Kraft Heinz’s objective is to receive materials with zero defects and no foreign material. However, in the nature of certain products there may be a Tolerance for defects written into the Kraft Heinz specification. If there is no limit defined in the specification, the default level is zero. Additives and chemicals known to be present in the raw material will have maximum limits listed in the specification. Wherever possible, these levels should be included at the lowest permissible amount while considering the food safety and the quality of the Material being supplied.
The supplier shall ensure that incoming raw materials, ingredients and packaging materials are not used or processed until they have been inspected or otherwise verified as conforming to specified requirements.

Where Pathogen testing is conducted, a Hold and Release procedure shall be applied until testing is complete.

Raw agricultural materials and ingredients from animal origin must be evaluated to ensure compliance with chemical contaminants (e.g., agro-chemicals including pesticide fertilizer residues, mycotoxins, environmental contaminants, process residues and contaminants, Heavy Metals, veterinary drugs, hormones, etc.) and applicable GMO regulations of the Kraft Heinz receiving country as per Kraft Heinz specifications. The supplier must be able to demonstrate compliance with these standards by routine monitoring throughout the year.

Animal products and crops used for infant feeding must be traceable back to the producer’s farm and records must be available that include the health and well-being of the animal, animal feed and veterinary drug use. Crops shall be sourced from selected farms with unique identification codes (GPS coordinates) without any nearby sources of environmental pollution. Crops may not be grown near any fields with experimental varieties.

Cereals and flours used for infant feeding may not have any post-harvest chemical application. For fruits and vegetables no post-harvest chemical application is allowed without advanced written agreement from Kraft Heinz.

Prior to accepting incoming raw materials, ingredients and packaging materials, the supplier must verify that delivery vehicles (such as trucks or railcars) have maintained the Food Safety and Quality and safety of the materials during transit. Verification activities shall be documented and shall include inspection of internal cleanliness, structural integrity, inspection of seal integrity (including that the seal numbers match the transportation documentation, such as a bill of lading), and measurement of internal temperature for refrigerated or frozen items. Trucks should remain locked when not in use.

Tankers shall be dedicated to food only, with records available for the previous product shipped. If applicable, the tankers should be adequately cleaned and sanitized.

For bulk transport, there must be proof of cleaning between consignments. If cleaning is insufficient to remove allergenic residues then no allergens must be carried in previous loads.

Drums shall be free of sharp edges and shall be free of dirt, flaking pieces, dust, rust or other foreign material. Drums shall be free of any insect or rodent infestations. Second hand drums are only allowable based on prior agreement in writing from Kraft Heinz.

Inbound loads suspected of any type of tampering shall be investigated by supplier. The shipment shall be rejected if the source of tampering cannot be determined.

Bulk raw materials must be protected against contamination during unloading and loading.

Access points to material receiving lines shall be identified, capped, and locked unless otherwise approved.

Pallets should be managed for contamination, unsanitary and physical conditions.
Wet pallets must not be used for product. Suitable controls should be in place which protects pallets from the environment (e.g. rain).

**Process Control**

Process control procedures must be in place to ensure conformance to Kraft Heinz’s specification. The supplier’s ability to meet the specification must be monitored and documented. Records must be available to demonstrate evidence of inspection and test results and compliance to the specification and must be reviewed prior to product release. All results must be within specification. Where results are out of specification, the Kraft Heinz Contracting Representative must be informed.

Co-manufacturing of Kraft Heinz production must not be undertaken under any circumstances without prior agreement and approval of Kraft Heinz.

For statistical process controls used, documented results shall indicate that the Material is in compliance with the specification. Corrective actions shall be taken if the process is trending out of compliance or is not centering on the target.

The Manufacturing Location must have a weight control program in place that complies with all Government Regulations.

The weight control program should include statistical process control (where appropriate), verification, Calibration, and corrective action activities.

The sampling criteria must be specified in the control plan and the data must be routinely captured.

Out of compliance Lots must be placed on Hold for further evaluation and Disposition.

Lighting must be provided in inspection areas at sufficient intensity to allow effective inspection.

**Cleaning**

The supplier shall have implemented a written Sanitation program that ensures cleanliness of the food production environment, equipment (including tankers inbound and outbound) and tools. The program should include, but not be limited to, the following:

- Sanitation schedules, procedures, methods, and frequencies;
- Correct use of appropriate sanitation equipment and tools;
- Equipment disassembly and re-assembly;
- Use of food grade cleaning, sanitizing, and disinfecting products;
- Chemicals to be used and how they are to be used including chemical concentrations, contact time, temperatures, frequencies, and rinsing procedures;
- All automatic cleaning systems must be monitored and comply with the cleaning program;
- Automatic systems for dosing chemicals must be routinely calibrated at the manufacturer’s suggested frequency;
- Verification of Sanitation effectiveness;
- Hygiene (non-Pathogen) monitoring programs;
- Inspection procedures; and
- Recordkeeping, record review, and corrective action plans.
The following considerations shall be taken into account when designing the Sanitation program:

Type of cleaning process:

- **Dry cleaning**: method used to clean equipment that does not involve the direct use of water. Examples: scraping, brushing, vacuums, and equipment wipe down with damp disposable wipes.
- **Wet cleaning**: method used to clean equipment to a microbiological level that involves the direct use of water and chemicals. Examples: rinsing, foaming, bucket and brush.

**Equipment idle time**: Situations when prolonged equipment downtime can lead to microbiological growth. Plants should have a program that defines the maximum idle time that can occur prior to inspection, sanitizing, or full re-clean being required.

Protocols with controls for extending production runs beyond established Sanitation cycle times.

**Adequate product protection when Sanitation activities occur adjacent to operating Production Areas**.

**Cleaning In Place/Cleaning Out of Place (CIP/COP)**.

**Equipment that is wet cleaned which needs to be used in a dry condition**.

**Post-cleaning or pre-start up inspections to confirm that equipment is clean, properly assembled, free from chemical residues and sanitized prior to use**.

**Verification and documentation of the effectiveness of the Sanitation program**.

**Cleaned equipment swabbing (using microbiology methods) and cleaned equipment teardown and inspection**.

**Adenosine triphosphate (ATP) measurement** (based on the detection of ATP by bioluminescence) can be the initial method of choice in monitoring the cleaning efficiency since it is a rapid measurement of the actual hygiene status of a sampled surface, allowing fast initiation of corrective actions in case of inadequate cleaning. ATP measurement, however, should not completely replace traditional techniques (e.g. swabbing), and should be integrated with traditional cultural techniques as part of a coherent surface cleanliness monitoring system. Although manufacturers of ATP measuring devices give general guidance on acceptable ranges for routine hygiene controls, internal standards have to be set for the given production environments.

**A periodic cleaning program (PIC – periodic infrastructure cleaning) and PEC (periodic equipment cleaning)** including scheduled frequencies and documentation.

**Floor drain cleaning and sanitizing procedure and schedule** that include a facility map with the exact location of each drain. High pressure hoses shall not be used and cleaning of drains must not be performed during production.

**Use of food grade cleaning, sanitizing, and disinfecting products**.

**Calibration of Sanitation-related measurement devices** (e.g. thermometers, gauges and meters).

**There must be a chemical control program in place**.
All cleaning chemicals must be approved by the appropriate regulatory agency for the application.

The purchase of chemicals must be controlled.

Cleaning chemicals must be stored in a locked area.

All chemical containers must be accurately and legibly labelled.

Cleaning chemicals must be suitable for food contact surfaces.

Safety data sheets must be available for all non-food chemicals.

Documentation must include CIP (Clean in Place) system and equipment breakdown procedures. The CIP set-up must be documented.

Parameters for CIP systems shall be defined and monitored to include chemical concentration, contact time, temperature, and flow. CIP systems shall be separated from active product lines (e.g. pasteurized versus unpasteurized).

The CIP control system shall contain:

- An index that lists all CIP units in the plant/department and product circuits and tanks that each unit cleans.
- The CIP program used to clean each circuit. It should describe the cleaning steps, time and temperature used, the type of cleaner and sanitizer, and the solution strengths.
- Simple schematics of CIP circuits to trouble-shoot and guide personnel in making jumper connections with product tanks, pipes, fittings and equipment.
- Orifice/reducer size and position are shown.
- A list of items in each circuit that require dismantling and manual cleaning.
- A description of automatic controls and interlocks.

The CIP system shall have:

- An automatic recording device for time and temperature located on the return pipe.
- An automatic recording of the supply pump discharge pressure or flowmeter.
- A method to detect return pressure (flow) that is capable of shutting down the system during the initial rinse cycle or contains an alarm that signals a manual shut down.
- A strainer located after the supply pump.
- An automatic recording device for chemical concentration (conductivity) on the return pipe.

CIP systems must have the following parameters recorded:

- Time
- Temperature
- Chemical concentration
- Flow or proof of flow
- Identity of the circuit being run (can hand write on chart)
- Operator identification
If during a circuit the minimal conditions for temperature and/or concentration are not met the time shall be paused until acceptable conditions are re-established. Raw ingredients, starter (culture) rooms or pasteurizers shall have dedicated CIP systems that must not be mixed or crossed. Spray-balls designed to be removed should not be left in tanks during operations.

Cleaning utensils must be specific to one area and/or application, be colour-coded to identify this, and be in good repair. Brushes and utensils for cleaning food contact surfaces shall be clearly identified (e.g. labelled and/or color-coded) and stored separately from non-food contact tools.

Floor drain cleaning brushes and equipment shall be clearly identified as such and maintained separately from other cleaning equipment.

Floor drain cleaning and sanitizing procedure and schedule shall include a facility map with the exact location of each drain.

Cleaning of the drains shall not take place during production and shall not use high pressure hoses.

Measures must be in place to verify and monitor the effectiveness of cleaning methods at a frequency based on risk assessment.

Equipment and facilities must be visually inspected after cleaning by an independent operator. Inspections must be documented, corrective actions must be completed and preventive actions must be put in place.

Microbiological testing may be used to monitor the cleaning and the environment. Records of findings must be kept and follow-up actions must be assigned with additional testing conducted to verify resolution. Microbiological limits must be specified.

For dry processing areas, procedures must be in place to clean equipment and structures.

The Sanitation program shall specify microbiological limits per business or food category requirements (e.g. total aerobic count, yeast, mold, coliforms, and other Indicator Organisms). Whenever results exceed or trend toward the specified limits, corrective actions must be taken and documented. If out-of-specification results are obtained, swabs must be repeated to ensure the corrective action was effective.

A process must be in place to verify that new cleaning procedures/instructions are adequate for the tasks.

**Identification and Traceability**

Traceability requirements apply to all products and components including ingredients, in-process products, Rework, primary packaging materials, and/or any processes.

Supplier must maintain "one up, one down/ one forward, one backward" records to identify the immediate previous source of food, ingredient, or packaging received and the immediate subsequent recipient of food or ingredient shipped.
The Manufacturing Location must identify/code incoming materials, including bulk deliveries and multiple Lot codes. Materials must be traceable through the supply chain to the Kraft Heinz delivery destination.

The process for Traceability of reworked and repacked products must be documented and practiced.

There must be a Lot-coding system for deliveries to Kraft Heinz as laid out in the Kraft Heinz specification.

At a minimum, suppliers of spices (as per 'high risk' spices and spice containing ingredients outlined in the illegal colorants policy) must be able to trace their spice supply chain back to the grinding process of whole spices.

The effectiveness of Traceability must be tested according to a defined Recall management program at least once a year.

Reconciliation must comply with Kraft Heinz requirement relative to time and retrieval effort. It must be within four hours with a goal of 100% Traceability to the point where the product is no longer in the Manufacturing Location’s control.

Ingredients and food-contact packaging must be traceable to finished product Lots.

Emergency contact information must be maintained with alternatives for 24 hour/7 days per week availability.

The supplier shall have written retrieval procedures in place that promptly and effectively respond to product issues that represent an unacceptable risk to Kraft Heinz and/or the consumer.

Product Retrieval procedures must include:

- Notification procedures, including contact lists and customer contacts.
- Protocol for retrieval and Disposition of all affected product, with designated authority and assigned responsibilities to ensure that sufficient controls are followed to allow for complete retrieval of product.
- Identification of delivery points, dates and quantities for affected product delivered further into the supply chain or to customers.
- Protocol for isolation of affected stocks and/or materials remaining under control.

The retrieval system shall be tested on an annual basis and after any major system changes to confirm (1) the Accuracy of all product and contact data and (2) the continuing effectiveness of procedures and Traceability systems. The results of these tests and any corrective actions necessary shall be documented.

The auditor may decide to challenge the Traceability system during the audit by pre-selecting a product as applicable to the provider.

Animal products and crops used for infant feeding must be traceable back to the producer’s farm and records must be available that include the health and well-being of the animal, animal feed and veterinary drug use. Crops shall be sourced from selected farms with unique identification codes (GPS
coordinates) without any nearby sources of environmental pollution. Crops may not be grown near any fields with experimental varieties.

**Control of Non-Conforming goods**

Procedures shall be in place to identify and control Non-Conforming goods found in process or returned from Kraft Heinz factories. The procedures must be clear on accountabilities for product release.

Disposition of Materials on Hold that do not comply with specific approved Kraft Heinz specifications must be effectively controlled and documented. The supplier shall have written procedures for the identification, documentation, evaluation, segregation (where practical) and determination and execution of the final Disposition of Non-Conforming goods.

Rejected material shall be clearly identified. The reason for rejection of the material, code dates, quantities involved and its Disposition shall be noted on the batch/Lot record. Records of actions and outcomes shall be maintained (for example, certificates or other evidence of product destruction or burial). Disposition shall be completed in a timely manner.

Procedures must address at least two levels of Holds:

- Category 1 Hold shall be used when a non-conformity poses a confirmed product safety issue, or major quality concern.
- Category 2 Hold shall be used when a suspected non-conformity poses a potential food safety issue or regulatory non-conformance

Inventory reconciliation must occur to verify proper control.

Non-Conforming goods must be segregated and controlled from inadvertent Release. Non-Conforming and quarantined raw materials, intermediates and finished products must be physically tagged for identification and/or stock must be electronically blocked. These must be visually checked on a daily basis for food safety Holds. Release must only be upon appropriate authorisation.

Segregated storage areas should be provided wherever possible. Temporary storage areas for segregated Non-Conforming goods must be identified with appropriate warning signs and made secure.

Non-Conforming goods will be held whenever:

- There is reason to believe that the product, its packaging or its process failed or will fail to meet the specification.
- The product is out of date, has an obsolete label or out-dated promotional offer.
- The ingredient, product, its packaging or its process is new or experimental.
- There are unfinished goods as “work-in-progress” in which an early release ingredient has been used.
- The goods are returned as defective.

If there is a potential food safety or a major regulatory concern, product must be segregated and physically secured, and clearly identified.
There must be a process or procedure used to control and track Rework (work in progress, finished product) through the production operation. The process or procedure must include the control and management of Rework containing allergens.

After release of a Lot/code of product to Kraft Heinz, the supplier shall not initiate Pathogen testing on either that Lot/code of product or any ingredients used in that product.

If any Material produced for Kraft Heinz is either inadvertently released from Hold or is suspected of non-conformance but has already been shipped to Kraft Heinz, the Kraft Heinz Contracting Representative shall be immediately notified.

**Finished Product Release**

In-process and/or finished goods must be inspected and tested to ensure conformance to Kraft Heinz specification (analytical, chemical, microbiological and physical).

Kraft Heinz specifications must be held on file and be readily accessible to the appropriate personnel.

Records must be available to demonstrate evidence of inspection and test results and compliance to Kraft Heinz specification.

Records must be reviewed prior to product release.

All results must be within specification.

Prior to release, evidence shall be documented to demonstrate one of the following:

- Evidence that control measures have been effective beyond the monitoring system (i.e., analytical or microbiological testing results).
- The control measures (i.e., CCP) comply with the performance intended of that product (e.g., CCP charts, retest data, evidence of rework).
- The results of sampling, analysis and/or other verification activities demonstrate that the product complies with the identified acceptable levels for the food safety Hazard(s) concerned.

**Hygienic Design**

The design of new plant equipment must be approved for hygienic control considerations.

There must be a documented procedure to review new plant equipment for hygienic design considerations prior to purchase.

There must be a procedure in place for technical (hygiene) approval prior to installation.

Equipment must be designed to allow thorough cleaning (i.e., no dead spots, dead legs or other areas that could conceal food and debris).

Food contact surfaces and utensils should be made of materials that are easily cleaned (not of porous material such as wood/natural fibers). The product contact surfaces must be smooth, and continuously welded.
Use of nuts and bolts in product contact zones shall be avoided where possible.

Equipment installations must be approved by a cross-functional team to ensure hygienic operating conditions.

Systems must be in place to ensure that cleaning procedures are initiated in conjunction with equipment installation.

Equipment used in the manufacture of food ingredients or Food Contact Packaging shall be:

- Cleanable
- Made of materials compatible with food and sanitation
- Smooth and accessible surfaces
- Capable of protecting product from contamination
- Self-draining
- Free from openings that could allow product or water to penetrate voids
- Designed to allow for proper ventilation

Each new capital installation or modification to existing equipment design shall undergo a documented sanitary design review by a cross-functional team (e.g., Food Safety and Quality, Sanitation, production, maintenance) in the design phase and commissioning phase of the project. The review shall evaluate the design against applicable industry sanitary design standards.

Where pipes and ducts must be insulated to prevent product from being contaminated by condensate, the insulation must be cleanable, or coated to be cleanable, and maintained in good repair.

Adequate access shall be provided to ductwork to facilitate pest inspection and cleaning.

**Printed Packaging Materials Control**

There shall be implemented procedures to ensure that labels match products.

Procedures must ensure that labels and pre-printed packages are stored in a manner that minimizes mixed label batches and mixing together other labels and packaging.

All food-contact materials must have food-contact material certificates (i.e., COA or COC) which meet regulatory acceptance or approval criteria from an approved Regulatory Authority.

Primary packaging shall not be from Recycled Material.

Where appropriate the supplier shall ensure that labels are correctly and consistently applied to materials supplied to Kraft Heinz, and that labels meet applicable Government Regulations and Kraft Heinz specifications. The supplier shall verify the Accuracy of labels for Allergen Profile, ingredient information, nutritional information, net quantity and specific claims.

Each label must include:

- Material name
- The name and address of the manufacturing site
- Packer and distributor (if applicable)
Lot number
Net quantity
“Best if used before” date (if applicable)
Storage conditions
Preparation instructions (if applicable)
Allergens and the appropriate certification symbol if required (e.g. Kosher, organic)

There must be a process to verify the accuracy of labels for allergen information, nutritional information, net weight and other specific claims, where applicable.

The “best if used before” date shall be consistent with the shelf life of the material as stipulated by the Kraft Heinz specification.

There shall be a procedure for line clearance. This procedure must include the process to account for or destroy unused pre-printed labels at the end of a run to assure the next run of materials is not inadvertently mislabelled.

The supplier must ensure through its procedures that labels and pre-printed packages are stored in a manner that minimizes mixed label batches and mixing together with other labels and packages. Special attention shall be given to packaging material changeover practices in line. Unused pre-printed labels at the end of a run must be accounted for or destroyed to ensure that the next run of materials is not inadvertently mislabelled. The supplier shall also have implemented procedures to ensure that labels match products.

**Warehouse Management**

The supplier shall implement systems to manage warehousing and transportation to ensure that the safety, food safety and quality, and security of Materials and products are maintained at all stages from receipt of raw materials, ingredients and packaging through delivery of Materials to Kraft Heinz.

All warehousing facilities must have in place a documented quality management system (which may be incorporated into the site’s quality manual).

The supplier shall use designated storage areas or stock rooms to prevent damage to, deterioration of or tampering with materials. In order to detect deterioration due to such things as pest infestation, unsanitary conditions and temperature/humidity control abuses, the condition of product in stock shall be assessed at appropriate intervals. Storage facilities shall be neat and orderly.

Storage must be off the floor. Pallets, racks and equipment shall be in good condition to prevent physical damage (e.g., free from nails, splinters). In some cases, products may be stored on slip-sheets (without pallets) based on the type of product and packaging.

If the supplier uses third party warehouses to store raw materials, packaging materials, semi-finished or finished products, the Supplier shall conduct documented periodic assessments to ensure that the requirements of this ISQE Manual are met.

All third-party warehousing must be approved by the Manufacturing Location. The third-party warehousing must be included on the Manufacturing Location’s list of approved suppliers.
Temperature sensitive items must be maintained at the correct temperature and must be stored according to their respective specifications. There shall be temperature controls that are monitored with adequate frequency.

Temperature controlled vehicles must carry suitable on-board temperature monitoring devices. Equipment must be capable of continuous temperature recording. Records must be dated, stored and available to Kraft Heinz on request.

The supplier’s transportation program shall ensure that products are properly temperature controlled at all times during transportation, and maintained in good condition, clean, dry and sealed.

Transport vehicles must be inspected for acceptability.

Records must be in place to verify that incoming and outgoing loads are inspected according to established procedures. Procedures must cover damaged goods and where evidence of tampering is noted.

A written agreement must be drawn up if contract haulers are used.

Loaded vehicles must be secured. Under no circumstances must loaded vehicles be left in unsecured areas or unattended during storage or in transit.

If a transport vehicle is a refrigerated or frozen container, temperature profiles of the contents must be recorded while the vehicle is loaded. These records must be available for inspection by Kraft Heinz.

Kraft Heinz goods must be despatched on a First In First Out (FIFO) basis (unless otherwise agreed with your Kraft Heinz Contracting Representative).

Bulk tankers should be of stainless steel construction, or other suitable food grade material. They shall bear the following mention: “For Food only”, or any equivalent mention. Bulk tankers must be equipped with appropriate safety devices for safe unloading.

When possible, all openings (e.g., doors, inspection ports, hatches) on outbound shipments (including outbound trailers) shall be sealed with a numbered seal and the seal number(s) annotated on the shipping documentation.

Inbound and outbound bulk containers shall be sealed.

For bulk tankers, cleaning certificates shall be available and checked before each is load and must include:

- Tanker plate number
- Nature of the previous load
- Date and hour of cleaning
- Numbers of the cleaned compartments
- Applied cleaning program (with water, with detergents, drying etc.)
- Seal numbers for tankers

The supplier shall also maintain a list of acceptable previous loads, and a list of prohibited previous loads.
Any form of transportation that is docked and connected to the Manufacturing Location for intermittent unloading for a period over 24 hours must have controls in place to prevent unauthorized access.

Trained warehouse employee must document that all full inbound and outbound truckloads are sealed using a numbered, tamper evident, resistant seal. There must be a broken seal procedure.

Use of tankers for food only must be documented with records available for the previous product shipped along with appropriate cleaning and sanitizing.

Damaged bags or drums must be sealed to prevent product spillage and contamination. Ingredients contaminated through damage must not be used. Spills must be cleaned up to prevent potential for infestation or Cross-Contamination.

Products with strong odours shall be segregated to avoid odour migration.

Bulk storage of liquid ingredients susceptible to microbiological spoilage shall have adequate controls in place to prevent spoilage or contamination (e.g., insulated, temperature controlled and monitored).

Pallets used for food products must be in good condition: clean, no broken boards, no evidence of mould or infestation, no off odours. Slipsheets shall be used to avoid raw material primary packaging contact with the pallet.

Trucks and containers (including pipes and loading / unloading equipment) shall be verified to be in good condition, dry, clean and free of off odours before loading. Wood racks are prohibited in trucks used for Kraft Heinz materials deliveries. If other materials would be transported in the same truck, supplier must make sure that it will not alter Kraft Heinz materials.

Interior trailer lights must be protected to prevent potential glass contamination.
APPENDIX 1 - DEFINITIONS

General Notes:

1. The terms used to designate requirements and recommendations stated in this document include:
   - shall, will, must – Used to express an obligation or imperative, binding, with no exclusions (i.e., what is mandatory).
   - should – Used to express a strong recommendation among other possible options.
   - may – Used to indicate an action which is permissible, but not mandatory.

2. To differentiate between the finished product (i.e. Material) produced by the supplier for Kraft Heinz, and Kraft Heinz’s finished product, Kraft Heinz’s finished product will be called “finished product.” All other terms, such as “material,” “ingredient” and “product” or “Material” refer to the Supplier’s product.

Alphabetical list of defined terms:

Accuracy: The degree of closeness to the target value of a certified reference or other standard.

Allergen Profile: The totality of the allergens which are present in a product by design, or are likely to be present due to Cross-Contact. The complete Allergen Profile must be properly identified.

Calibration: The adjustment of measuring, adjusting, and monitoring equipment to assure that: 1) for equipment that measures across a range of values, the measurements are accurate across the entire range to the permitted degree of Accuracy; 2) for equipment that is used to measure a single point, that the measurement reaches the permitted degree of Accuracy.

Carry-Over: Traces of product from the previous product run, which cannot be adequately cleaned from the product line due to technical limitations.

Category I Hold: Shall be used for situations when a Non-conformance poses a potential food safety, major regulatory, food safety, or quality concern.

Category II Hold: Shall be used for situations when a Non-conformance poses a potential product food safety, quality or minor regulatory concern.

Certificate of Analysis (COA): A document provided by the supplier which indicates results of specific tests/analysis performed on a defined Lot of the supplier’s product. The tests are done either by the supplier or an external testing firm, and must be based on protocols/methods that have been approved and agreed upon by technical experts within Kraft Heinz.

Clean in Place (CIP) System: A system that cleans solely by circulation and/or flowing chemical detergent solutions and water rinses onto and over the surfaces to be cleaned by mechanical means.

Continuing Pure Food Guaranty: A common regulatory document that food industry suppliers use to assure customers that their products comply with the Federal Food, Drug, and Cosmetic Act and related requirements.
**Controlled Hold:** A hold status that is used for the reasons other than those that are included in the definition of Category I and Category II Holds.

**Critical Control Point (CCP):** A point at which control can be applied to prevent, eliminate or reduce a food safety Hazard to an acceptable level.

**Cross-Contact (also Cross-Contamination):** The introduction of Pathogens from a raw product to a cooked product, or the introduction of allergens into a product which are not part of the intended formulation, through environmental conditions. For example, Cross-Contact may arise from: 1) traces of product from a previous production run that cannot be adequately cleaned from the production line due to technical limitations; or 2) physical contact at any point in the manufacturing process with products or ingredients that are produced on separate lines, or in the same or adjacent Production Areas.

**Disposition:** The determination of what will be done with the object of the determination. For example, the Disposition of Non-Conforming product that has been placed on Hold is the determination as to whether to release, destroy, or take other action with the product.

**Extraneous Matter:** Any object or matter that may become part of the product being produced, which is not designed to be part of such product. Extraneous matter may be a foreign object, foreign material or an aberration in the product or product ingredient. Examples may include: metal; stones; wood; plastic; paper and matter inherent to raw materials (e.g., bone, nut shells).

**Farm Operations:** Growing and harvesting of crops, the raising of animals (including seafood), or both. Washing, trimming of outer leaves of, and cooling produce are considered part of harvesting.

**Food Contact Packaging (also “Primary Packaging”):** This encompasses any physical contact (i.e., solid, liquid, or gaseous exchange) between packaging and food under actual and foreseeable conditions. It includes packaging which has:

- a surface in direct contact with a food product, and/or
- a surface in air contact with the product, such as material touching another Packaging Component that is not hermetically sealed (air tight) or that has low barrier properties, and/or
- a surface in contact with a food product after opening.

**Food Defence:** Steps to safeguard the food supply against intentional acts (or the threat of an act), such as a mass contamination or product tampering.

**Food Safety and Quality Program:** A logical sequence of actions designed to assure specific product Food Safety and Quality specifications are met.

**Food Safety and Quality System:** Organizational structure, policies, programs and procedures needed to manage product Food Safety and Quality.

**GFSI:** Global Food Safety Initiative.

**GMO:** Genetically modified organism, a food which has been derived from, or developed from an organism which has been modified by gene technology.
Government Regulations: The laws, statutes, regulations, and/or codes of the location where products are produced and the laws, statutes, regulations and/or codes of the destination to which products may be delivered.

HACCP: Hazard Analysis and Critical Control Point.

Hazard: The potential to cause harm to human health. Hazards can be biological, chemical or physical.

Heavy Metal: Silver, arsenic, barium, selenium, lead, mercury, cadmium and hexavalent chromium.

Hold: A status assigned to a specified product indicating it must remain stopped from normal handling processes until further notice. Synonyms include terms such as: quarantined, blocked, segregated, contained, and embargoed.

Indicator Organisms: Microorganisms that may not themselves be considered pathogenic, but whose presence may indicate unsanitary conditions and/or potential presence of specific Pathogens. For the purposes of this ISQE Manual, indicator organisms for Salmonella in wet environments include total enteric bacteria or coliforms. Indicator organisms for L. monocytogenes would be Listeria genus.

ISQE Manual (also Manual): This Kraft Heinz Ingredient Supplier Food Safety and Quality Expectations Manual.

Kraft Heinz Contracting Representative: The primary contact for any contact or notification required by this ISQE Manual, who will vary depending on the region.

Lot (also Lot Number): A unique identity given to a defined quantity of a material usually based on time and location of manufacture. For continuous processes, a lot may not exceed the amount of material produced in one 24-hour period. For non-continuous processes, the batch, blend, shift, or other time segment may be used to identify a lot. For materials received in bulk, the lot is usually identified as the contents of the bulk vehicle.

Manufacturing Location: the supplier facility, site, or plant where the Material is produced. This includes blending operations, chopping and any direct handling of the Material with the potential to introduce physical, microbiological or chemical risks including allergens.

Microbiologically Sensitive Materials (also “Sensitive Ingredient”): An ingredient deemed to be susceptible to containing Pathogens or supporting the growth of Pathogens. Sensitivity of an ingredient is based on origin, the manner in which it is processed, and/or on epidemiological and historical data.

Non-Conforming: A product or good that fails to meet specifications, regulatory requirements, or the requirements of this Manual.

Packaging Component: All elements of packaging including adhesives, labels, inks, dyes and stabilizers.

Packaging Critical Control Point (PCCP): A critical Packaging Control Point, which does not fulfil the Codex requirements, but should be applied in the relevant area to minimize the anticipated risk.

Pathogen: A food borne microorganism recognized as a public health Hazard that can cause illness or death in humans.
Pesticides: Compounds classified as such by the Regulatory Authorities having jurisdiction over the location where materials or products are produced and/or the destination to which they may be delivered. These include, but are not limited to, fungicides, insecticides, rodenticides and herbicides.

Product Retrieval: Any voluntary or involuntary retrieval of product that has been released for distribution.

Production Area: Any area of the Manufacturing Location where products, raw materials, ingredients or packages are handled or stored, and may be subject to contamination, either directly or indirectly.

Recall: Removal or withdrawal (voluntary or involuntary) of a product from commerce because it may be in violation of applicable Government Regulations (e.g., it is misbranded or adulterated) or pose a significant health and safety risk.

Recycled Material: A pre- or post-consumer use material that has been treated, salvaged, refurbished or otherwise reworked for re-use.

Regulatory Authority: Any national, provincial, local, governmental regulatory body (and any of their employees’ or authorized agents) appointed or authorized to oversee activities of the food industry. Examples include European country specific Food Standards Authorities, Trading Standards Authorities; Food and Drug Administration, U.S. Department of Agriculture, Bureau of Alcohol, Tobacco, Firearms, and Explosives; and Canadian Food Inspection Authority. For purposes of this Manual, “Regulatory Authority” also includes any religious organization, which defines requirements for special product certification (e.g., Kosher).

Release: The action to discharge a product from Hold status for use after the cause of the Hold has been investigated, and Disposition determined.

Rework: Any product or product component that fails to make it completely through the manufacturing process in its first pass, but is suitable to be returned to the process stream. Rework can result from liquid or solid semi-finished product as well as from all finished products. Rework may include Non-Conforming product (finished or semi-finished), intermediate material or product used to flush ingredient and product delivery lines.

RTE: Ready to eat.

Sanitation: All actions dealing with cleaning or maintaining hygienic conditions of a Manufacturing Location. This ranges from cleaning/sanitizing specific equipment to periodic cleaning activities throughout a Manufacturing Location, including plant and grounds cleaning activities.

Tolerance: Allowable deviation from the target value of a certified reference or other standard.

Traceability: The ability to track materials on a Lot Number basis up and down the distribution chain; for example, to trace a specific lot of ingredient/component from the supplier who delivered it, to the product that contains it and to track a finished product to the primary external customer(s) or destination(s).