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North America Warehouse Requirements Manual

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Purpose

To provide Kraft Heinz requirements for the systems for Quality Administration on all aspects of Warehouse, Handling, Storage and Transportation Controls required to be implemented by Warehouses and Re-packers. *Note -the numbering system below is aligned with ISO Standards.*

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Introduction

As a public warehouse provider (“Provider”) handling and storing various food products and ingredients, including related packaging, Kraft Heinz North America (KHNA) looks to Provider as a key link in the chain of consistently providing safe and delicious foods to Kraft Heinz North America’s customers. That chain is only as strong as the weakest link. Therefore, Kraft Heinz North America is furnishing Provider with this Kraft Heinz North America Warehouse Requirements Manual (“Manual”), which contains what Kraft Heinz North America has determined to be the basic minimum requirements of maintaining a safe environment for food products in a public warehouse (“Warehouse”).

Except as otherwise provided in a written warehouse agreement (the “Agreement”) between Kraft Heinz North America and Provider, and unless otherwise agreed to by Kraft Heinz North America and Provider in writing, Kraft Heinz North America reserves the right to modify this Manual and its expectations in the event of regulatory changes, changes in the business climate, changes in Kraft Heinz North America’s customer needs or changes in Kraft Heinz North America’s knowledge or understanding of the best way to protect the quality and safety of Kraft Heinz North America’s products. Provider shall, at all times, take all reasonable safety precautions and shall exercise reasonable care, follow customary warehousing practices, and comply with all applicable federal, state and local regulations, ordinances and laws including those pertinent to the receiving, handling and storing of sanitary food products.

After reviewing the contents of this Manual, Provider must sign the Acknowledgement of Receipt and Compliance with Requirements of the Kraft Heinz North America Warehouse Requirements Manual, which is attached hereto as **Attachment A**, and then return it to the Kraft Heinz North America’s representative who furnished this Manual to Provider.

In case of conflict between this Manual and the Agreement, the terms of the Agreement shall control.

Chapter 4 - Quality Management System

The Operator must establish, document, implement and maintain a quality management system as a means of assuring that Kraft Heinz products or materials are handled, stored and transported in conformance with specified requirements (agreed in the contract), and continually improve its effectiveness in accordance with the requirements given in this document. This includes compliance with these requirements, Kraft Heinz specifications and any applicable regulatory requirements.

The quality management system must include:

- Documented procedures for the warehousing, handling, storage, re-packing and transportation of Kraft Heinz materials and products.
- Documented procedures for the Control of Documents and Records related to Kraft Heinz materials and products.

Procedures and documents must be accurate, reviewed, dated, approved by management and distribution controlled. A review must be conducted minimum annually. Superseded documents must be archived and readily retrievable where appropriate.

Documentation must be up-to-date and available to staff at all locations to enable them to perform their role in the quality system. Document and data retention for Kraft Heinz materials and products must be three years from activity date.

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Chapter 5 - Management Responsibility

Top management, or the person or group of people who direct or control the organization at the highest level, must provide evidence of its commitment to the implementation of Kraft Heinz Warehousing, Handling, Storage, Re-packing and Transportation Expectations (also referred to as Kraft Heinz Warehouse Expectations). A member of site management must have the responsibility and authority to assure that the quality management system is established, implemented and maintained.

5.1 - Responsibility, Authority and Communication

The responsibility, authority, and interrelation of personnel who manage, perform and verify work affecting compliance with Kraft Heinz specified requirements must be defined and documented. This information must be included in policies, procedures and job descriptions, etc.

5.2 - Food Regulatory Agency Inspections and Contacts

- Each warehouse shall be registered with FDA per requirements of the Public Health Security and Bioterrorism Preparedness and Response Act of 2002 and applicable FDA regulations, including 21 C.F.R. Part 1, Subpart H (as may be amended from time to time).
- All facilities where Kraft Heinz products are stored or handled must permit food regulatory inspections by authorized Federal, State, and Local food safety officials. Credentials of regulatory inspectors must be verified.
- Each facility must have designated personnel trained in the management of regulatory inspections.
 - The designated personnel must have undergone documented training on handling regulatory inspections.
 - Only designated personnel must escort the investigator at all times.
 - A yearly review of Kraft Heinz Warehouse Expectations related to Regulatory inspections is required.
- A written procedure must be in place to describe the process for notification as described below, follow up and closure of any issues arising from inspections or contacts.
- Kraft Heinz contact names and addresses must be available and current.
- Each facility must have a system in place to provide written and oral notification to Kraft Heinz for any inspection relating to materials or products stored for Kraft Heinz. For inspections that relate to Kraft Heinz materials or products, Operators must call (*refer to RACI Chart*) upon inspector arrival and provide the written report from the inspection within 24 hours of completion of inspection. Inspections for which notification is required may relate to the following, among other reasons:
 - Visits, inspections or sample collections from regulatory agencies
 - Product holds directed by a regulatory or law enforcement body due to Food Defense related threat or suspicion, and
- If the investigator presents a court issued warrant, **immediately** contact (*refer to RACI Chart*).
- If a regulatory inspection does not relate to materials or products stored for Kraft Heinz, the Operator must provide a written report of the inspection within 24 hours of completion of inspection.
- A traceability report must be immediately conducted for the concerned lot (quantity received in the warehouse, in stock, and shipped out by delivery point and by date) and be available for Kraft Heinz.
- If any product stored for Kraft Heinz is sampled by a regulatory agency, all products with the same lot code as that sample (SKU) must be placed on hold and (*refer to RACI Chart*) contacted. Decisions on subsequent action to be taken will be made by the Kraft Heinz contact and must be documented.
- A duplicate sample of the lot of any material taken by the external regulatory bodies is required by Kraft Heinz. These samples must be stored at the facility unless requested by a Kraft Heinz contract representative.
- Samples must be labelled and stored under appropriate conditions.

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- The taking of pictures of Kraft Heinz property or product is not permitted unless approved by (*refer to RACI Chart*)
- If questions arise during a regulatory inspection specific to Kraft Heinz products or policies, please reach out to (*refer to RACI Chart*) for additional guidance.

Chapter 6 - Resource Management

6.1 - Good Warehousing Practices (GWP)

Good Warehousing, handling, storage, and transportation practices (GWP) must be followed to ensure that products are stored and handled under sanitary conditions as required by applicable laws and regulations, including 21 C.F.R. Part 117, Subpart B.

- The Operator must assure that all personnel, visitors, and contractors follow the GWP.
- All items must be stored to avoid direct contact with the floor (e.g., on pallets, slip sheets or racks). Sitting or standing on product shipping cases is prohibited. Over stacking of product must be avoided.
- Products must not be stored immediately adjacent to containers for waste (does not include identified trash can in the aisle with appropriate sanitation controls) or non-product items (e.g., cleaning compounds).
- Soiled and/or dusty exteriors of cartons or other product containers must be cleaned before they are conveyed into the warehouse or to customers.
- Broken or spilled product must be cleaned up in a timely manner. Product with exposed contents or those which have been punctured or opened in any way cannot be recouped, sold, or transferred to another container. Product must be disposed of according to local, state, and federal waste disposal regulations and site procedures.
- Damaged cases with no apparent damage to consumer units must be promptly moved to a segregated repacking or hold area. Items under USDA jurisdiction (e.g., meat, poultry) must not be recouped unless the facility has been given approval by (*refer to RACI Chart*). Code dates must not be intermingled in cases during the recouping process. Only identical code dated product may be packed into individual shippers. Kraft Heinz Business Units may provide specific guidelines that must be followed.
- Damaged products must be disposed of promptly and not allowed to accumulate in excessive amounts.
- Dock doors must not be left open when not in use.
- Fork lift trucks (FLT) must be in good repair, clean, and free from leaks. FTL utilized inside a facility must preferably be electric powered. Liquid Petroleum Gas (LPG) is acceptable. Gasoline or diesel powered FTL are only allowed to be used outside the facility.
- FLT batteries must be stored in a designated area in such a way as to avoid risk of material or product contamination.
- All materials and products must be properly identified and labelled. Food containers must be used only for food products.
- Controls must be in place to ensure that employees wash their hands when necessary e.g., prior to returning to work from breaks or as they become soiled.
- Activities which could lead to product contamination are not permitted in product handling areas. This includes eating or drinking, chewing gum or tobacco, smoking, holding objects in the mouth (e.g. toothpicks), and spitting.
- Trash and disposal practices must not contribute to contamination, such as filth, undesirable microorganisms or pests, or any other objectionable situation for the product stored or handled at the facility. The disposal of liquid food wastes must not be placed into the public sewage system.
- Garbage areas / compactors must be covered, dumped on a routine basis and properly maintained so they do not become an attractant, harbourage, or breeding place for pests and to prevent odorous conditions.
- Labelled (e.g., "waste/trash") and covered containers for the storage of trash, refuse, and debris inside the warehouse must be provided. Recyclable materials that will not attract pests may be excluded.

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Internal trash containers must be emptied at least daily and cleaned adequately and regularly (i.e. part of sanitation schedule).

- Designated areas and equipment must be provided for the dumping of trash containers and the temporary storage of trash/waste on the premises.
- Non-food wastes, both liquid and solid, should be disposed in a manner consistent with Federal and State Regulations. Non-food wastes may require special handling.
- Containers used to store bulk waste/inedibles must be constructed of metal or other non-absorbent material and be equipped with tight fitting lids. Trucks used for disposal of trash must be spotted at the trash-dumping site at the building only for the length of time required to promptly load the trash and waste material. Transport of bulk waste to disposal sites must not result in spillage or loss of such wastes while in transit.
- Glass and brittle materials including hard plastic components and equipment should be avoided in product areas where possible. If their use is necessary, a glass and hard plastic inspection program and breakage procedure must be in place and documented.
- Pallets must be stored in areas that are free of moisture, dirt and litter, and free of bird, insect or rodent contamination.
- Pallets should not be stored outside (i.e., exterior to the building). If pallets are stored outside, they must be checked before entering the warehouse. If pallets are stored outside, they need to be appropriately inspected to assure that they are clean, dry, and free of pests or mold prior to use.
- A pallet inspection program must be in place to verify that pallets are suitable for use (e.g., clean, dry, free from mold, off-odors and infestation, no broken wood or loose nails)
The program must cover:
 - New pallets
 - Incoming goods pallets
 - Shipped product pallets
 - Waste/ disposable pallets

6.2 - Competence, Awareness and Training

Documented procedures must be established and maintained for employee selection, hiring, and training of all personnel, including temporary personnel, consultants, or contractors performing activities affecting compliance with Kraft Heinz specified requirements. Each facility must determine training needs and ensure employees receive appropriate training from qualified trainers. Employee understanding of the training must be assessed by defined means (e.g., verbal test of understanding) to assure that training objectives are met. Records of all training must be maintained.

Each facility must assure that all employees handling Kraft Heinz product receive appropriate training in:

- The site Quality Management System required to meet the requirements set out in this manual, Kraft Heinz specifications, and regulatory requirements.
- Good Warehousing Practices (GWP) (for all employees including temporary and seasonal)
- Topics necessary to perform their function satisfactorily e.g., Forklift driving, incoming materials inspection, recording of lot numbers for traceability, etc.
- Employee illnesses and control of communicable diseases.
- Allergens to ensure awareness and basic understanding to avoid cross contamination when damage or spills occur.
- Hold and release.

Induction training sessions must be organized for temporary and seasonal personnel as needed (according to personnel turnover).

Refresher training must be carried out at appropriate intervals (best practice: annually).

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6.3 - Infrastructure

- The facility must be of sound construction and free from leaks.
- The internal and external structure must be free of cracks, holes, openings, or any other areas that would allow harbourage or entry of pests. (Guidance: a gap of ¼"/6mm can allow entry of mice.)
- Supply conduits (air, water, electricity) must be installed in such a way (e.g. under the floor) that they do not provide a cleaning/foreign matter/pest control issue.
- The structure should be free of potential sources of contamination (e.g. flaking paint, condensate from overhead pipes or structures, exhaust fans, grease, fraying insulation, undesirable molds or dirt).
- Floors, walls, ceilings, overheads and drains must be cleanable and constructed to resist deterioration from product or cleaning chemicals.
- All light fixtures in finished product and/or raw material storage areas must be shielded or have plastic coated bulbs to prevent contamination in case of breakage. Where this is impractical, a documented glass breakage control procedure must be in place and followed.
- All exterior doors must be kept closed and must form an adequate seal when closed. Self-closing doors are preferred. Loading docks must be protected to prevent pest entry. Entrance of air must be limited by vestibules, air curtains as appropriate.
- Doors, windows and other openings must prevent access to unauthorized people. Where possible, the outer perimeter must be fenced to improve security of the facility and its contents.
- Access to utilities (e.g., water supply, heating, ventilation) must be controlled to prevent unauthorized access.
- Where wet cleaning is necessary, floors must be adequately designed to prevent standing water. If applicable, all new floor drain installations must be trapped and vented to prevent sewer gas entry, and must be accessible and cleanable. Existing floor drains which are not trapped and vented must be sealed, or a plan made for their replacement.
- Hand washing and restroom facilities must be appropriately designed and maintained.
- This includes adequate water temperature, antibacterial soap, single-use paper towels, and trash receptacle.
- Grounds must be maintained to prevent risk of pest harbourage, and be free from idle machinery and equipment, litter, debris, and odor.
- The façade or installations must not be a harbourage or nesting place for birds or other pests.
- During construction, sufficient controls must be in place to prevent contamination and ensure adequate sanitation (no dust).
- The facility must be capable of providing appropriate temperature and humidity requirements for storage or transport in order to meet Kraft Heinz specifications for the products concerned. Buildings and land shall provide adequate drainage to prevent the formation and retention of standing water, which could provide breeding locations for insects and/or microorganisms, and to prevent entrance or seepage of food borne filth or disease into facilities.
- The facility should be located in an area that is free from objectionable odors, smoke, fly ash, excessive dust or other contamination that may pose concerns to product.
- The facility should be located to prevent potential microbiological and chemical risk factors such as contaminated soils or ground water, waste disposal areas, feed plants, polluted streams, or areas of livestock concentration.

6.4 - Maintenance Controls

A documented preventive maintenance program must be in place to assure that the building, equipment, and transportation systems do not pose a product contamination or quality risk and are suitable to meet Kraft Heinz contracted conditions. This includes but is not limited to all materials handling equipment, and

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utilities (cooling systems, air ventilation systems, trucks, containers, forklifts, hoses, alarms etc.). Use of solvents must be controlled to avoid cross contamination.

6.5 - Sanitation Controls

- The facility must have a documented sanitation/housekeeping program in place. The program must assure the sustainable cleanliness of storage facilities, product handling areas and all transportation equipment and vehicles, as the nature of the product requires, and with consideration for peak periods.
- The building (ceilings, overheads, walls and floors) and transportation equipment (containers, etc.) must be free from dust, debris, insect webbing, mold growth, etc.
- Sanitation procedures, schedules, and records of cleaning must be documented.
- A system for verifying the effectiveness of the sanitation program of the entire facility and the transportation vehicles must be in place.
- Precautions must be taken for protection of products during cleaning activities.
- Cleaning chemicals, equipment and materials used must have approved specifications. All cleaning, sanitizing and disinfecting products must be suitable for use in a food handling environment.
- Hazardous materials or chemicals (e.g. pesticides, cleaning materials, disinfectants) must be secured and segregated from Kraft Heinz product storage areas. Access to hazardous materials or chemicals must be restricted to allow use by designated employees only.
- Proper tools must be utilized to prevent extraneous matter contamination of the product (e.g., separate tools for floors, drains).

6.6 - Pest Control

- Exclusion is the first line of defense and primary method of controlling pests.
- A documented pest control program and practices must be in place to effectively prevent pest activity in the facility and grounds.
- A documented Pest Control Risk Assessment must be completed, prioritized and implemented.
- A designated person shall be responsible for the pest control program.
- If pesticides are applied internally that person must be licensed appropriately.
- A register of approved materials for pest control & Safety Data Sheets (SDS) must be available
 - A pesticide is considered approved if all of the following criteria are met.
 - Compliance with all local laws.
 - Application methods follow label instructions.
 - Suitable for use in a food manufacturing or storage warehouse (label).
 - Not categorized by the Pesticide Action Network (PAN) as a BAD Actor Product* and on the approved pesticide list. Pesticides that are Bad Actors on the PAN list contact (*refer to RAC/Chart*)
- If pesticides are stored on site the following requirements apply:
 - There must be a dedicated storage area, reserved for this purpose.
 - The pesticide area must be securely locked at all times when not in use and only pesticides and pesticide application equipment may be stored.
 - The pesticide storage area must have a sign clearly designating this area for pesticide storage.
 - The area must be properly ventilated.
 - Pesticide areas containing liquid or volatiles, liquid under pressure must be continuously, mechanically ventilated to the outside.
 - Appropriate safety equipment on hand:
 - Eyewash station and sink with potable water must be available in the immediate proximity.
 - A fire extinguisher must be available nearby along with absorbent materials to handle pesticide spills.

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- Floor drains are discouraged in pesticide storage areas.
- All containers of pesticides must contain the date of receipt to help control the age of inventory. Stocks that are over one year old, or have exceeded the manufactures expiration date, require the facilities Quality Manager to check with the supplier that the out of date pesticide(s) remain in compliance of the approved pesticide requirements.
- All pesticide labels include general instructions for appropriate storage. State/province and local laws vary considerably; so specific instructions usually are not included.
- Follow local laws for storage
- Many local regulations require a report of the types and amounts of pesticide that are stored.
- The pesticide storage room should have the appropriate hazardous material symbol posted on its exterior. The storage area should be kept dry and cool but never allow freezing. Rooms storing metal phosphides should not be sprinkled. Direct sunlight should be avoided. The room should have a cement floor (or equivalent), which will not absorb spilled material. A stainless steel worktable is a plus.
- Store all pesticides in their original labeled container in which they were received and store off the floor. If a pesticide container is damaged, immediately transfer the contents to another container with an identical label and use containment platform. Empty containers must be handled in accordance with the label guidelines. Triple rinsing of containers with recapture of first rinse for makeup water is recommended.
- Fumigants may require unique storage. Local regulations related to pesticide storage supersede the contents of this manual. Fumigants shall not be stored on Kraft Heinz property
- Disposal of unused pesticides, of empty pesticide containers and out of code products must comply with regulatory requirements; local, FDA, CFIA per the label.
- Pesticide purchases must be managed to keep inventories at a maximum one-year supply. Inventory must be taken and reconciled monthly.
- Missing inventory or other irregularities must be investigated and reported to the plant security coordinator

- Contracted pest management companies must document the following information for each pesticide application:
 - Applicator name
 - Each pesticide used along with the volume used,
 - Concentrated and diluted volume used
 - Pesticide lot number
 - Targeted pest
 - Area pesticide was used
 - Expiration if applicable
 - Applicators using pesticides are required to keep records for two years or longer if required by the particular country, state/province and pesticide
 -

- Reporting of pest sightings and pest removal
 - The log must document all pest activity observed by the facility and communicated to the PCO (pest control operator).
 - Each entry must include the date, any evidence noted including area/location, and actions taken. An electronic system is acceptable
 - Monitoring of the pest control contractor and trend analysis to ensure pest controls are maintained and effective


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- Insect Light Traps (ILT's) & Pheromone Traps
 - ILT can be installed in receiving or warehouse areas close to entrances, but so they are not visible from the building exterior. Wall mounted units at elevation of 2 to 5 feet / 0.60 – 1.50m (center of unit 3 feet / 1m off the floor) will provide a higher level of attraction to common flies. Consideration of target insects may require alternate height installation.
 - ILT should be used only indoors in strategic locations to intercept flies and flying insects that are normally attracted to the facility.
 - If ILT should be installed near entrances to filling or processing areas these should be placed in such way not to attract insects to these rooms.
 - ILT can be installed and are also effective in facility interiors such as storage areas.
 - In a processing or filling room where product is exposed, light traps should be at least 10 feet / 3m away from exposed food. And only glue board type
 - All new installations of ILT should be of the variety with a glue board.
 - Insects caught in ILT should be reviewed for species, quantity, significance, source, or trends of insects' type. This information can be used as an indicator of other conditions in your facility
 - Pheromone traps should not be placed over open product or other risk areas.
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Flying insects	Min Inspection Frequency	Cleaning Frequency
Insect light traps-not considered a control method but a surveillance device Must not be used on exterior of building.	2x Month (Can be adjusted seasonally)	Monthly Bulb must be changed yearly.
Pheromone traps	Bi-weekly (Where used) (Can be adjusted seasonally contact KHC for recommended adjustments)	Replace as needed.

Insect Escalation

		Action Level 1	Action level 2	Action level 3
Flour Sifter Tailings Insect Counts	Level of Activity	Insect counts are approaching 2.0 per 100,000 pounds / 45 metric tons of ingredient sifted.	Insect counts exceed 2.0 per 100,000 / 45 metric tons pounds of ingredient sifted.	Insect counts exceed 2.0 per 100,000 pounds / 45 metric tons of ingredient sifted for more than 2 months and efforts to reduce the counts have not been effective.
	Corrective Action	Check age of stock and check the cleaning schedule for the ingredient storage vessels. Make arrangements for using old stock and schedule a cleaning of the affected vessels.	Take immediate steps to empty and clean the storage vessels. Advise (<i>refer to RACI Chart</i>)	Advise Business Unit Quality Conduct investigation to identify cause. Develop corrective actions (e.g. fumigation) & execute corrective actions.

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Stored Product Insect Activity	Level of Activity	An increased level of activity observed based on <i>routine inspection results</i> .	Insect activity following corrective action continues at similar level after 4 weeks.	Insect activity continues to increase after 6 weeks.
Confused Flour Beetle (CFB), Red Flour Beetle (RFB), Flat Grain Beetle (FGB), Saw Toothed Grain Beetle (STGB), Indian Meal Moth (IMM), Cigarette Beetle (CB), Roaches	Corrective Action	Identify plan and take corrective action. Contact (<i>refer to RACI Chart</i>)	Take additional corrective actions. Contact (<i>refer to RACI Chart</i>)	Contact (<i>refer to RACI Chart</i>).
	Level of Activity On <u>ANY</u> Zone 1 area	Insect trails, live insects, area trends, insects noted in audit, or PCO report –	Insect activity following corrective action continues	Insect activity following corrective action continues
	Corrective Action	Define treatment, identify plan take corrective action. Contact (<i>refer to RACI Chart</i>).	Investigate and define treatment, identify plan, take corrective action. – Contact (<i>refer to RACI Chart</i>)	Investigate and define treatment, identify plan, take corrective action. – Contact (<i>refer to RACI Chart</i>)

Rodent Control

- Rodent traps are required on interior ground level floors at perimeter walls and both sides (inside and out) of active exterior doors of the facility and ground level storage areas.
- Product storage, receiving and shipping areas/facilities are always considered to be high control (Control Level A).
- Snap traps in lieu of bait may be used in bait boxes for areas where bait is not permissible.
- *Traps must be placed on both sides (inside and out) of active personnel doors (not emergency doors) and appropriate number of dock doors. They must be clean and free of rodent evidence.*
- If temporary devices are used for a current problem, they do not require service stickers or ID, but must be checked daily while plant is in operation. Temporary devices in use for more than 6 months will be considered permanent and will need to comply with identification and mapping policy requirements.

Rodent Traps

- Traps should be placed at right angles along wall so that the enlarged trigger half of the trap is immediately adjacent to the wall; Rodents have poor eyesight and habitually run along walls.

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- Automatic Traps are capable of repeated catches without resetting and functions without bait. This box type trap has an inside trigger mechanism or platform that is capable of catching several mice without resetting.
- Accepted brands include the Tin Cat, Mouse Master, and Ketch-All.
- Traps should be placed along walls. Mice will enter the trap opening out of sheer curiosity. Bait is not required.
- Two different types of Snap Traps are available: for mice or rats. These are: standard sized trigger and expanded trigger. If snap traps are temporarily required, the enlarged trigger trap should be used.
- If there are multiple catches in a relatively short time (2 in 4 weeks in an area), there may be a population of rodents infesting the area. Then the temporary use of snap trap or glue board is recommended. The "standard trigger" trap is best for mouse control when baited with a non-allergic attractant. For temporary control, the traps can be positioned in-groups of 3 every 25 feet / 7.5m, and the distance between each trap in a group of 3 should be about 2 feet / 60cm. Temporary devices may be used for a current problem as long as mice are being caught, but should be removed as soon as the rodent problem is under control.
- Where mouse infestation exists and their travel route is unpredictable, place traps at right angles to pallets and skids.
- Where local laws prohibit the use of glue boards or traps, non-toxic indicator devices capable of detecting rodent activity may be used as an alternative method for internal rodent monitoring. As soon as a rodent activity is identified, immediate corrective action (e.g. placement of mechanical traps or glue boards) is required.

Rodenticides

- Rodenticides are not permitted inside facilities which manufacture or handle Kraft Heinz products and warehouses since poisoned rodents will hide and die. Rodents may also move poisonous baits within the facility.
- If there is a professional recommendation to use rodenticide inside the facility contact (*refer to RACI Chart*).
- Throw packs and loose rodenticide baits such as pellets and meals are not permitted. Only baits that can be secured inside bait stations are permissible.
- Rodenticide must not be used when there is a potential for public access
- Only Kraft Heinz approved rodenticides may be used. No products that are a bad actor on the PAN may be used.
- Use caution when baiting with allergenic material.

Glue Boards

- Glue boards can be used as an alternative to or in conjunction with, automatic traps for interior rodent control. It is not recommended that they be used alone.
- Glue boards must be kept free of debris and are to be replaced when they become soiled.
- Glue boards, when inspected, must be replaced when they contain rodents, rodent evidence, insects, or other vermin.

Bait Stations

- Bait stations must be in service in all outside areas where rodent activity is possible and must be maintained all year.

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- During heavy snow accumulation, bait stations do not need to be checked, but affected stations can be removed and replaced when the snow has melted. Documentation must be maintained as to the reason service is not completed.
- Bait stations must be tamper proof and secured.
- Gluing bait stations to blocks or bricks is not acceptable unless the block is staked down or otherwise secured to prevent lifting, tipping, or removal.
 - Staking and cabling are acceptable within the property fence line. Outside the fence line, bait stations shall be secured to the ground.
- Only bait stations designed to allow for securing the bait are acceptable.
- The definition for the term "tamper-proof bait box":
 - Resistant to weather.
 - Strong enough to prohibit entry by large non-target species.
 - Equipped with an access panel that can be securely attached.
 - Equipped with entrance that readily allows target animals access to bait while, at the same time, denying access to larger non-target species (baffles, mazes or small entrances).
 - Capable of being anchored securely to resist efforts to move the container or to displace its contents
 - Blocks may be used to elevate stations subject to wet conditions, however the block must be anchored or secured appropriately
 - Equipped with an internal structure for containing baits.
 - Made in such a way as not to be an attractive nuisance.
 - Capable of displaying "proper" precautionary statements in a prominent location
- To be effective, bait stations must be kept clean, dry and attractive to rodent. Bait is most effective when fresh; therefore, it is important not to overload the stations.
- Exterior or perimeter baiting is very important. It reduces the outside population and the number of rodents that will attempt to get inside of the facility. The label must be followed.
- Bait stations should be placed tight against the building. A second perimeter of defense is encouraged but must follow label requirements.

RODENT TRAPS – Interior

Control Level	Definition	Approximate Spacing	Inspection Frequency
A (high)	Required for all facilities until a 12 month history is developed	25 feet / 7.5 m for process plants exterior walls and on each side of exterior doors inside and out 50 feet / 15 m for finished product storage & shipping facilities and on each side of exterior doors inside and out	Weekly

Exterior stations (mechanical/bait stations) (Snap traps in lieu of bait may be used in bait boxes for areas where bait is not permissible.)

Control Level	Definition	Approximate Spacing	Inspection Frequency
A (high)	Required for all warehouse facilities	50 feet / 15 m	Bi-Weekly

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Rodent Control Escalation Guidelines

		Action Level 1	Action level 2	Action level 3
Mouse Activity interior of Facility	Level of Activity	One mouse catch or one sighting	Two or more catches in same area over 4 weeks.	7 or more rodents caught in any given 8-week period within the entire plant.
	Corrective Action	Inspect associated areas for activity. Increase trapping (snap traps and glue boards) to one Control Level higher than current state, for area of activity. If no catch in three weeks – return to normal status.	Increase trapping (snap traps and glue boards) to Control Level A for area of activity. Contact (Refer to RACI Chart)	Contact (Refer to RACI Chart)
Rodent non – mouse interior	Level of Activity	One sighting or catch.	Two or more catches for two consecutive weeks in same area.	More than 2 rodents caught in any given 4-week period in the same area.
	Corrective Action	Take corrective action. Contact (refer to RACI Chart)	Take additional corrective actions. Contact (refer to RACI Chart).	Continue proactive activities. Contact (refer to RACI Chart).

Bird Control

All facilities which manufacture and handle Kraft Heinz products shall have effective bird control program (if needed) and bird control practices.

Expected Program Requirements Most birds are protected under federal laws. The English sparrow, feral pigeons and European starlings are not protected in the United States. However, regulatory laws shall be checked before attempting bird control.

- Nesting or roosting places may attract birds and shall be eliminated.
- An effective sanitation program that eliminates food sources must be maintained.
- Birds are a constant and serious public health concern. They are known to carry or transmit several diseases, and carry insects and mites. Their excrement contains salmonella, defaces buildings and equipment and fouls areas where people walk and work. Nests clog drains and air intakes and their droppings and feathers can contaminate large quantities of stock feed and food destined for human consumption.
- When attempting bird control, extreme care must be taken to avoid injury to non-target species. Some of the methods for effective bird control include:
 - Exclusion
 - Sanitation
 - Elimination of habitat & food
 - Live trapping and relocation
 - Repellents
 - Eradication (avicides & shooting)
 - Netting

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- Exclusion is the first line of defense in protecting foods and commodities. Screening and keeping exterior openings such as doors and windows sealed, screened or closed prevents birds from entering facilities and warehouses. Eliminating roosting places through good sanitary design is very important, especially in commodity unloading areas and around shipping and receiving docks.
- The food source that attracts birds to warehouses is generally around the dumpster or compactor, or along the truck docks and parking areas.
- Live trapping and netting are methods that can be very effective in some circumstances. With large outdoor populations of birds, such as around flour mills, trapping has proven to be only marginally effective. When birds are trapped they should be relocated far enough away that they do not return to the facility. A variety of traps made can be used.
- Baited glue boards and nets are effective means of capturing birds inside food facilities and warehouses. Some bird nets, such as mist nets, are restricted by law and may only be used under the direction of licensed Technician. Check state and local regulations before using nets.
- Repellents are effective bird deterrents with some being more effective than others. Items such as plastic owls, eyes, rubber snakes, spikes, noisemakers, lights, flags, sticky substances, and balloons, are all types of deterrents. These devices are not a permanent method of control. Birds, after an initial scare, become accustomed to scare devices and then the devices no longer serve to repel them.
- There are several ways to eradicate birds. The method to use depends on what the regulatory laws allow regarding the particular bird species.
- The use of fatal methods, like the application of avicides and shooting, should be avoided, if possible, and used only when other control methods have failed.

Avicides

- Check all regulatory laws before applying avicides.
- Must *refer to RACI Chart* before considering avicides.
- Avicides are restricted use pesticides and their use requires a certified applicator.
- Never apply avicides in food areas and always follow the label instruction for specific methods of application and personnel safety requirements.
- Extreme care must be taken to avoid exposure of non-target bird species to the avicide. If target species and non-target species cannot be separated then avicides must not be used.
- Avitrol, a common avicide, is designed to upset and disorient the bird flock. However, it is generally the case that some birds will experience a fatal dose. Arrangements must be made to quickly recover dead birds so as to avoid negative public comment.

Bird Escalation Guidelines

		Action Level 1	Action level 2	Action level 3
Bird activity interior of Facility	Level of Activity	One sighting or catch.	Two or more catches in same area over 4 weeks.	Three or more sightings or catches in 8 weeks
	Corrective Action	Take corrective action. <i>Refer to RACI Chart.</i>	Take additional corrective actions. <i>Refer to RACI Chart.</i>	Continue proactive activities. <i>Refer to RACI Chart.</i>

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Bird activity on facility exterior	Level of Activity	Bird activity is causing an unsanitary condition on roof or adjacent areas.	Bird activity is causing unsanitary condition and has the potential of concern of employees or city.	Complaints received from community, regulatory, or employee.
	Corrective Action	Refer to control programs in manual, inspect roof and remove potential food source. Develop & implement strategy for control and suppression. <i>Refer to RACI Chart.</i>	Continue to proactively monitor, inspect roof and remove food source. <i>Refer to RACI Chart.</i>	Continue to proactively monitor, inspect roof and remove food source. <i>Refer to RACI Chart.</i>

Records

- Contractor approval
 - Copy of the pest contractor license
 - Usage of pest control chemicals / pesticides
 - Pest sighting reports
 - Inspection / monitoring reports
 - Corrective and preventative actions taken following a pest control failure
 - Location / mapping of identified pest control devices (ILT's, pheromone traps, bait stations, temporary devices)
 - Each facility shall maintain a simple up-to-date drawing of the entire facility, outbuildings and surrounding grounds.
 - The maps must be dated and updated annually.
 - Pheromones, bait stations, traps, permanently placed glue boards and ILTs shall be numbered; for example, bait stations (B1, B2, etc.); traps (T1, T2), and their location in or around the facility shall be marked on the drawing. Temporary traps, bait stations, and ILTs that are temporarily (less than 6 months) added to the facility due to escalation guidelines do not need to be added to the facility map, but can be tracked via an alternate method (e.g., pest control operator report).
 - An inspection tag must be attached on the inside of the equipment lid for non-transparent traps. Inspection stickers can be on the outside if the trap has a transparent inspection cover. As an alternative, electronic data gathering systems can be used if they record the required information by scanning the trap or other types of effective recording systems can be used. Whatever method is used, the minimum required recorded information is the date of the inspection, who completed the inspection and the device number/id. Scan trap and scan location (two ways to verify)
2. Pest activity / trend analysis
- Manual or electronic or other trending software / trending of activity are required at a minimum by area. In the case where increased activity is being detected, the trending shall be completed by trap in the specific area where increased detections are being found. This increased level of trending should continue until low to no detections are again established.
 - The goal of trending is to evaluate needs for remediation and identify persistent issues that require building maintenance, training, or improved exclusion practices.
 - Each facility shall maintain a simple up-to-date drawing of the entire facility, outbuildings and surrounding grounds.

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- All bait stations, traps, *permanently placed glue boards* and ILTs shall be numbered; for example, bait stations (B1, B2, etc.); traps (T1, T2), and their location in or around the facility shall be marked on the drawing. Temporary traps, bait stations, and ILTs that are temporarily (*less than 6 months*) added to the facility due to escalation guidelines do not need to be added to the facility map, but can be tracked via an alternate method (e.g. pest control operator report).
- An inspection tag must be attached on the inside of the equipment lid for non-transparent traps. Inspection stickers can be on the outside if the trap has a transparent inspection cover. As an alternative, electronic data gathering systems can be used if they record the required information by scanning the trap. Whatever method is used, the required recorded information is the date of the inspection and who completed the inspection. The scanning method shall also identify the device number/id.
- Adherence trending: 1) follow & observe PCO 2) passive (note card etc.) 3) interview employees.
- Routinely review the pest log. Recommendation is minimum quarterly with the PCO.
- Equipment maintenance (plant responsibility unless otherwise stated in site contract)
 - Facility and site design and maintenance shall restrict the entry and harborage of pests.
 - Eliminate all possible entrances into the facility. All active windows must be screened. All doors, windows, and screens must fit tightly. Doors must be kept closed.
 - All openings for fans and exhausts must be louvered or screened.
 - The screen mesh should 18 mesh and 18 mesh over ½" mesh for rough duty, e.g., openings for fans and exhausts. Plastic screen may not be used.
 - Pipe openings through facility walls must be sealed.
 - Product pipes must be capped when not in use.
 - High grass and weeds around the facility or in adjacent areas must be eliminated. These provide excellent hiding areas for rodents.
 - Scrap, pallets, pipe, drums, etc., shall not be accumulated on the grounds or parking lot.
 - Metal refuse containers should have tight fitting covers and be stored on racks, if outside.
 - All rat holes and burrows must be closed.
 - All ingredients, equipment, and supplies received should be inspected upon receipt for rodent excreta or any signs of gnawing and chewing on the containers. Mice often enter the facility on supply loads.
 - All openings on wall and roof penetrations must be screened to prevent insect or rodent ingress.
 - A pea gravel border 3' / 1 m wide and 4" deep and free of vegetation must be maintained around the building perimeter, except in paved areas.
 - Warehouse and storage areas: must keep a walkway free of items (suggest 18") from wall.
 - A minimum 30 foot wide vertical border, free of vegetation from the ground to above the roof must be maintained around the building perimeter is recommended, unless grandfathered. This includes tree limbs and shrub around production areas.
- Additional Guidance Information
 - A mouse can enter through ¼" / 6mm openings.

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Chapter 7 - Product Realization (Service Provision)

7.1 - Requirements Related to the Product / Service

The company must not handle, store, or transport products for Kraft Heinz before a formal contract is signed by both parties.

7.2 - Customer Related Processes and Communication

The Operator must determine and implement effective arrangements for communicating with Kraft Heinz in relation to:

- service information and non-conforming product
- inquiries, contracts or order handling, including amendments
- customer feedback, including complaints from Kraft Heinz or its customers
- any incident related to Kraft Heinz product food safety or quality (e.g. tampering, theft, trailer loss, etc.) and
- product inventory issues

In cases where the Operator receives complaints from a Kraft Heinz customer, notification must be made to Kraft Heinz immediately (maximum of 24 hours – *refer to RACI Chart*). The customer complaint should be acknowledged, but no response may be given by the Operator on behalf of Kraft Heinz without prior authorization.

Defined notification procedures including emergency contact lists for internal, external, and consumer contacts must be maintained.

7.3 - Design and Development

The Operator must comply with:

- Functional and performance requirements specified by Kraft Heinz, including a documented plan to control potential food safety hazards (biological, chemical and physical). The plan must follow the HACCP principles of first conducting a risk analysis, identifying appropriate controls for the risks identified, establishing control limits, monitoring and corrective action plans in the case of out of limit results.
- Applicable statutory and regulatory requirements. Storage and transportation of Kraft Heinz materials and products must conform in every respect to all relevant country legislation, and the applicable provisions of the corresponding laws and regulations of the country in which the material is used or the product sold.

7.4 - Procurement

Controls must be in place to assure that any purchased materials or services that may affect Kraft Heinz materials or products, or service provisions, comply with the Contract (and specifications in the case of repackers) and any applicable regulations. Examples include but may not be limited to:

- Hygiene and Pest Control services (including chemicals used)
- Warehousing, Transport and Distribution services
- Food Defense and Security
- Packaging items (shrink foil, slip sheets, pallets)

The Operator must evaluate and select suppliers or services based on their ability to supply products or services in accordance with Kraft Heinz contracted requirements. Criteria for selection, evaluation and monitoring must be established and recorded. Any necessary actions arising from evaluation and/or monitoring, including supplier disqualification, must be maintained.

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- The Kraft Heinz Contact must be notified prior to contracting third party outside storage or transportation of Kraft Heinz products.
- Kraft Heinz Requirements must be documented and communicated to all contracted third party warehousing and transportation providers.

7.5 - Product Receipt & Shipping Controls

Documented procedures for receipt and shipping of Kraft Heinz products must be defined for all stages of the distribution process. These must include, at a minimum:

- Controls for deliveries to warehouses including customs clearance must be defined and in place. Any cross border inbound shipment requires verification that product has cleared Customs and a “FDA May Proceed” is available prior to shipment to customers. Cross border shipments will be unloaded and placed on hold until the “FDA May Proceed” is confirmed.
- The following criteria must be in place and documented:
 - Inbound and outbound vehicles must be inspected and verified to be clean, dry, free from leaks, off-odors and unusual residual materials (powder or liquid) prior to loading/unloading. This inspection must be documented. If a load is suspected of being contaminated, unfit, or otherwise unacceptable, notify warehouse management and take pictures. The Operator must treat the product as a food safety risk, hold product, and obtain disposition from (refer to RACI Chart). If a load is suspected of being infested, the warehouse must isolate the load. If possible, the load should be isolated on a trailer and moved away from the building. The trailer must be sealed.
 - Materials and products must be inspected for damage, infestation (including evidence of bite marks on cases), temperature abuse, potential security concerns such as perforated cases, and exposure to moisture or unusual odors. Products damaged due to moisture, condensation, water, etc. must be destroyed (e.g., landfill or placed in the compactor) unless an alternative method of disposition is approved by (refer to RACI Chart).
 - Theft of a full trailer or partial trailer load from the Warehouse must be reported to (*refer to RACI Chart*) within two hours of the first evidence of the occurrence.
- Inbound and outbound bulk containers must have numbered, tamper evident, resistant security seals on all doors, hatches, and openings. Acceptable seals include:
 - Drums with a locking ring
 - Drums without a locking ring secured with tamper evident tape
 - Large bags such as super-sacks or totes containing plastic liners with a bag closure that will readily reveal any tampering and will not permit removal / reinstallation without breaking the seal
 - Corrugated cases effectively sealed and tamper-evident
- Seal numbers must be on the BOL and match the seals on the transport equipment.
- Equipment received with broken, missing, or unreadable seals, or seal numbers that do not match the BOL, shall be rejected until is contacted (*refer to RACI Chart*) and a risk assessment completed to determine the potential for loss, damage, or product tampering.
- If there is other evidence of unsatisfactory shipping practices or tampering, then the materials must be immediately placed on hold. A risk assessment must be carried out in cooperation with (*refer to RACI Chart*). Examples: prohibited materials within the shipment, prior use of the vehicle to haul prohibited materials (placing the current shipment at risk of contamination), or improper temperature.
- The seal must be broken only after it has been examined and verified.
- In the event that a security seal has been broken by an authorized person (e.g., border / customs officers) there must be appropriate records to describe the reason for the seal removal, including the authorized person’s name and identification or badge number. A replacement numbered seal must be applied, and details recorded on the load documents. The original broken seal must be retained in case it is requested by a Kraft Heinz customer’s receiving personnel to compare against the BOL. [Note: For loads with multiple drop-off points within a one day delivery period, it is sufficient for the vehicle to be under lock control].

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- Where permissible, the credentials of delivery drivers should be verified in addition to the delivery documentation (for example, driver name shown on delivery documents, photo ID on license).
- Procedures for reporting stock or delivery issues (e.g., shortages, delayed deliveries) must be agreed with Kraft Heinz contracting manager.
- Orders must be picked, assembled and verified against Kraft Heinz delivery documentation.
- Deliveries must be palletized and wrapped according to Kraft Heinz specifications.
- Loads must be assembled to Kraft Heinz / customer specifications, in such a way as to safeguard the product (e.g., heavy products at bottom).
- For equipment used for transport of LTL, partial loads or courier services must be kept secure during transit to the destination site by locking. The delivered Product must be inspected for physical integrity and verified against the documentation upon arrival.
- For LTL shipments of food products that are on the same trailer with chemicals, the necessary procedure is to inspect the materials to insure no visual or odor cross contamination.
 - No Visual or Odor Contamination – Unload the materials into normal inventory.
 - Visual or Odor Contamination – Unload the materials and place into inventory on Hold. (In most cases, these products are shipped FOB Origin and belong to Kraft Heinz.). If the carrier appears to be at fault, file a proper claim. Contact Kraft Heinz Carrier Claims for disposition.

Requirements for transportation:

- Product quality and integrity must be preserved during transport.
- Solid top, hard-sided, or lockable vehicles must be used.
- Transportation equipment must have sound interiors and exteriors, tight seals on all doors and hatches, adequate insulation, and refrigeration unit(s) in working order (where necessary).
- Vehicles must be specified as suitable for transportation of foodstuffs (clean, free from odors, and have no detectable leaks). The inspection of the trailer must be documented. Minor defects should be corrected before loading. This includes the removal of any debris, sweeping and/or vacuuming the floor (including the floor racks, if any), and removing protruding nails from the floor, walls, or ceiling. Vehicles that contain major defects should not be loaded. They should be rejected to the carrier stating the reason for rejection. A record must be kept of the rejection and details relayed to the carrier. Defects that cannot be corrected include: objectionable odors, evidence of contamination or infestation, refrigeration equipment unit(s) not in good working order, holes in the floor, roof, or walls, etc.
- Temperature controlled vehicles must carry suitable on board temperature monitoring devices, which alert the driver in case of failure. The hauler must have a procedure in place to periodically verify the effective operation of temperature monitoring and temperature control devices.
- Procedures for dealing with vehicle or refrigeration systems breakdown must be in place, and include notification to (*refer to RACI Chart*).
- Carriers are responsible for developing and implementing written procedures to specify practices for cleaning, sanitizing if necessary, and inspecting vehicles and transportation equipment to ensure appropriate sanitary conditions are maintained.
- Carriers must develop and implement written procedures for responding to Kraft Heinz requests to identify the most recent cleaning of a vehicle intended for a bulk shipment of food and/or the previous cargo transported in a vehicle intended for a bulk shipment of food.

Special Requirements for Temperature Controlled/ Protected/Conditioned, Chilled and Frozen storage/distribution (e.g., where product specifications require temperature controls):

- Surface temperature of product (e.g., outer case – tail of trailer) on incoming vehicles must be checked and recorded prior to unloading. The carrier temperature gauge and the refer unit temperature setting must be confirmed to maintain the product ship temperature as required by the specification. The set point and the temperature reading must be recorded. If there are signs of temperature abuse or if the

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set point or reading temperature is not consistent with the product specification, the product must be placed on hold and approval must be obtained from (*Refer to RACI Chart*).

- Check set point of refer and truck temperature.
- Risk assessment, checks and procedures need to be in place to avoid the risk of condensate water on pallets / product packages.
- Trucks/Containers must be conditioned to the specified temperature as required by the spec prior to loading.
- Internal temperature of the vehicle must be checked and recorded before loading.
- Curtains or flaps must be used where outside temperature is out of the product specification range and loading areas are not controlled.
- Products must be pre-chilled/frozen to the specified temperature as required by the spec prior to loading and product must be kept at specified temperature at all times; any interruptions must be addressed and recorded.
- Carriers are responsible for maintaining the bill of lading keep temperature at all times. The carrier is also responsible for (a) pre-cooling transportation equipment upon request; (b) maintaining records in any form sufficient to establish compliance with the bill of lading keep temperature; (c) providing such records of temperature compliance to Kraft Heinz or the consignee upon request; (d) providing the bill of lading keep temperature to the consignee upon request; and (e) developing written procedures to outline how temperatures and related records will be documented and provided upon request.

7.6 - Storage

The condition of product in stock must be assessed at appropriate intervals in order to detect contamination, tampering, theft or deterioration, e.g., due to pest infestation, age, unsanitary conditions and temperature/humidity control abuses.

- Access to storage areas (e.g., closed dock doors); including products, packaging materials and exterior storage areas (e.g., tanks, silos) must be restricted to authorized personnel only.
- An effective FIFO (first in first out) or FEFO (first expired, first out) system must be in place for all materials or products stored for Kraft Heinz.
- Products or materials that have a strong odor must be segregated to avoid cross contamination.
- Pallets, racks and equipment must be maintained in good condition to prevent any physical damage to materials or products (e.g., free from nails, wood splinters etc.).
- Airflow from heaters / refrigeration units must be directed away from materials and products.
- Product and non-food items must be handled and stored in a manner to avoid contamination, including pests, or transfer of odors. Dividers or other precautions, e.g., traffic controls, separate air systems should be used for protection.
- Racking and storage areas (e.g., staging areas, bins) must be adequately spaced from the walls (minimum 12 inches / 30 cm) to allow for inspection of areas for cleanliness, insect or rodent activity. Additionally, where rodent control devices are placed there must be an 18 inch / 45 cm gap to allow for inspection. Where this is not possible, alternative means of access must be demonstrated.
- Direct sunlight on product should be avoided.
- Kraft Heinz is responsible to specify and communicate the required shipping, storage, and handling conditions for product. Requirements for shipping temperatures are communicated in the Kraft Heinz Transportation Specifications and must be communicated to carriers as a mandatory keep temperature on the Bill of Lading.
- Where specified, monitoring of temperature and humidity must be carried out using calibrated recording equipment (See Section 7.8).

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7.7 - Identification and Traceability


Warehousing, Handling, Storage, Re-packing and Transportation facilities must have a documented system for the identification and traceability of Kraft Heinz products and materials in place.

- This system must allow the Operator to trace the entire history of a specific lot from receipt through all stages of storage and shipping within 4 hours. This must include identification of all materials handled and the customers to whom products were distributed (one step upstream – material received and handled; one step downstream – products distributed to). Time in excess of 4 hours may be allowed in tracing the individual product components of bundled products with mixed code dates provided Kraft Heinz still has sufficient time to provide the full history of the products being traced within 24 hours.
- The Operator must have capability for tracing and reporting to Kraft Heinz inventory transactions by lot code and item number and by pallet ticket number:
 - Receipts
 - Shipments
 - Pallet to pallet movements (i.e., pick line)
 - Inventory Adjustments (i.e., write on, write off)
 - Movement to module area or repacker
- Periodic recall exercises must be carried out to verify system capability (minimum annually). Kraft Heinz may also initiate trace exercises to verify system capability and the site is required to participate in such exercises. The expected accuracy is 100% of product accounted for within 4 hours. If this is not met, then an explanation should be provided to Kraft Heinz (*refer to RACI Chart*) Control within a 24-hour period. Documentation of the recall must be kept for a minimum of three years for audit purposes.
- Incoming Kraft Heinz products or materials must be identified with the Kraft Heinz lot number.
- Physical verification of product SKU, code date, and case quantity must be conducted upon receipt. The system receipt record must match those physical attributes of the pallet unit. Any discrepancy must be resolved prior to completing the receiving process.
- Cases that are identified in the distribution network as having inconsistent consumer unit and shipping case code dates will assign the code date based on what is printed on the shipping case (traded unit).
- For customer shipments, the site must have a documented procedure to identify mixed code date pallets and reflect the correct code date and quantity within the Warehouse Management System (WMS).
- Locations that ship to customers must maintain ticket genealogy in the Warehouse Management System (WMS). This information must include the inbound pallets, item and lot code, product movement between pallets, and the outbound pallets.
- Packages that are reconfigured (combined or consolidated) into new consumer units must have traceability maintained and meet the requirements in the Appendix for Repackers. For consumer units that contain more than one component, the open date code on the finished package must be the same or earlier than the component with the earliest expiration date.

7.8 - Control of Monitoring and Measuring Devices

The Operator must determine the monitoring and measurement to be undertaken and monitoring devices needed to provide evidence of conformity of service to specified requirements. This recording equipment must be located in representative locations (worst case scenario).

- A procedure for measuring and monitoring equipment calibration must be documented. A calibration program of control devices e.g. thermometers (including infrared thermometers), humidity controls, scales, etc. must be in place. This must include:
 - Master list of equipment to be calibrated, identification number, location, frequency of calibration and acceptance criteria.

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- Minimum required accuracy or allowable tolerance of the monitoring and measuring device outside of which recalibration, repair or replacement is necessary.
- Responsibility for performing calibration.
- Calibration activities must be documented and corrective action to be taken when the results of a calibration are out of the specified limits.
- When measuring equipment is found to be out of standard, a risk assessment must be completed to determine any product implications regarding food safety, quality or regulatory.
- Notification to Kraft Heinz in cases of equipment or calibration failure (*refer to RACI Chart*).
- Calibration must be against known and valid standards which are traceable to international or national measurement standards. Where no such standards exist, the method of establishing and maintaining the standard for calibration must be documented.

Chapter 8 - Measurement, Analysis and Improvement

8.1 - Hold & Release / Control of Non-Conforming Product

- A written hold & release control program must be in place to assure that materials and products which need to be specifically identified/isolated and held, pending determination of their final disposition, will not be inadvertently dispatched.
- Personnel must be designated with the authority and responsibility for management of Hold and Release Programs, including monitoring and tracking held product through to final disposition. Designated Warehouse Personnel must be responsible for ensuring that product is placed on hold in the warehouse inventory system, tagged, monitored, and in compliance with all Kraft Heinz procedures. This includes setting up Hold ID's, if possible, within the site's computer inventory / tracking system. The site Facility Manager (or like position) has overall responsibility and accountability for the control of all products, including management of the Hold and Release program. The Facility Manager may delegate the authority (but not the responsibility) to manage the Hold and Release process.
- A training and awareness session must be conducted at least annually for all personnel involved with hold and release activities.
- The Designated Warehouse Personnel must assure that product which does not conform to specified requirements is identified and controlled to prevent its unintended use or distribution, according to the Hold classifications listed below.
- A record of ALL hold events must be maintained for three years after activity date. Available information must include:
 - The hold category
 - Code date(s) or ticket number(s), and quantity
 - Reason for hold
 - Investigative information
 - Final disposition and authorization
 - Inventory verification and reconciliation
- Any materials or products suspected or identified to be non-conforming must be placed on hold immediately upon discovery or immediately when requested by Kraft Heinz.
- If Kraft Heinz requested product to be held, then Kraft Heinz must provide the disposition.
- Where non-conformance is detected in products which are already in distribution, Kraft Heinz must be notified immediately (*refer to RACI Chart*) and corrective/preventive actions must be completed. Consideration must be given to identification and segregation of remaining stock.
- The specific reason for hold must **not** be shown on the tag or hold sticker, a numeric reason code must be used.
- Full traceability of all non-conforming products must be in place and inadvertent movement must be prevented through an effective system; inventory must be controlled.

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- A process must be in place to immediately notify Kraft Heinz (*refer to RACI Chart*) when any material or product stored for Kraft Heinz, or designated for shipment to a Kraft Heinz facility or to the trade is inadvertently released from hold.
- Program for holding inbound inventory at the time of receipt to include in transit and customer returns.
- Held product inventories must be reconciled at the time when final disposition is implemented and at any inventory count action taking place before.

Any material or product hold must be classified into one of three 3 types of Hold. If it is unclear which hold category to use, default to the more strict hold category. Refer to RACI Chart for Kraft Heinz contacts.

	Category 1 Hold	Category 2 Hold	Category 3 Hold
Use for:	<p>When a non-conformity poses a confirmed product safety, major regulatory, or critical quality concern – for example:</p> <ul style="list-style-type: none"> ○ Undeclared Allergens identified in product or materials ○ Failure to meet CCP/sPP models ○ Contamination due to employee illness ○ All product associated with a recall or being withdrawn from commerce. 	<p>When a non-conformity, or any suspected non conformity, poses a potential food safety issue or regulatory non-conformance or a minor product or material quality defect – for example:</p> <ul style="list-style-type: none"> ○ Non-conforming product pending corrective action completion, re-testing and, or final disposition decision. ○ Product from stolen loads or loads with broken seals without a new Regulatory seal, trailer accidents, ○ Suspected product tampering, contamination by pests, or temperature abuse 	<p>When other reasons exist for needing to hold product, unrelated to food safety or regulatory issues – for example</p> <ul style="list-style-type: none"> ○ Product produced as a result of a trial ○ Product that has primary package damage ○ Inventory control purposes
Notify Kraft Heinz	Required	Required	Required
Disposition	<p>Disposition for products on hold must be approved in writing by a designated Kraft Heinz representative.</p> <p>Prior to disposition execution, a final inventory of product must be documented and reconciled against original hold quantities. If there are discrepancies, a documented investigation must occur.</p> <p>If there is a partial disposition, then that portion of material or finished good must be inventoried prior to use or disposition execution. Inventory documentation must reflect the disposition of this material or product.</p>	<p>Disposition for products on hold must be approved in writing by a designated Kraft Heinz representative.</p> <p>Prior to disposition execution, a final inventory of product must be documented and reconciled against original hold quantities. If there are discrepancies, a documented investigation must occur.</p> <p>If there is a partial disposition, then that portion of material or finished good must be inventoried prior to use or disposition execution. Inventory documentation must reflect the disposition of this material or product.</p>	<p>Disposition for products on hold must be approved in writing by a designated Kraft Heinz representative.</p> <p>Exposed product dispositioned to landfill/destroy can be approved at the site level.</p> <p>Prior to disposition execution, a final inventory of product must be documented and reconciled against original hold quantities. If there are discrepancies, a documented investigation must occur.</p> <p>If there is a partial disposition, then that portion of material or finished good must be inventoried prior to use or disposition execution. Inventory documentation must reflect the disposition of this material or product.</p>
Identification & Segregation	Finished product and production components must be placed on hold immediately in the Warehouse Management System (WMS) upon notification.	Finished products and production components must be placed on hold immediately in the electronic Warehouse Management System (WMS) upon notification.	Finished products and production components must be placed on hold immediately in the electronic Warehouse Management System (WMS) upon notification.

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	<p>Where computerized stock control systems are in use, product must be electronically obstructed from movement/use and only trained and authorized employees must have the ability to modify the status or location.</p> <p>Each shipping unit of product or material must be visually identified with hold stickers, tags or tape to prevent usage and shipment. The physical controls also apply to facilities that use automated or computerized inventory management systems. If storage locations do not allow for safe human entrance (Laser Guided Vehicle or Automated Storage Retrieval System), then visual identifiers are not required. Product or material must be placed in a segregated and secured area to prevent usage and shipment. For product that is loaded on trailers but still in the yard, necessary steps must be taken to remove product from the outbound shipment and place on hold. Shipments that have left the yard must not be stopped/turned around unless specifically directed by Kraft Heinz.</p>	<p>Each shipping unit of product or material must be visually identified with hold stickers, tags or tape or every tier of each bay/location using hold tape or banners to prevent usage and shipment. The physical controls also apply to facilities that use automated or computerized inventory management systems.</p> <p>Product/Material placed in a segregated area where possible. If storage locations do not allow for safe human entrance (Laser Guided Vehicle or Automated Storage Retrieval System), then visual identifiers are not required.</p> <p>Where computerized stock control systems are in use, product must be electronically obstructed from movement/use and only trained and authorized employees must have the ability to modify the status or location per Kraft Heinz approval.</p> <p>If there is no computerized stock control system in place, each shipping unit of product/materials must be visually identified.</p> <p>Where product or material needs to be moved to external storage or between inventory bearing locations (IBL), each shipping unit must be visually identified as being on hold.</p>	<p>Each shipping unit of product or material must be visually identified with hold stickers, tags or tape or each bay/location using hold tape or banners to prevent usage and shipment. The physical controls also apply to facilities that use automated or computerized inventory management systems. If storage locations do not allow for safe human entrance (Laser Guided Vehicle or Automated Storage Retrieval System), then visual identifiers are not required.</p> <p>Where computerized stock control systems are in use, product must be electronically obstructed from movement/use and only trained and authorized employees must have the ability to modify the status or location per Kraft Heinz approval.</p> <p>If there is no computerized stock control system in place, each shipping unit of product/materials must be visually identified.</p> <p>Where product or material needs to be moved to external storage or between inventory bearing locations (IBL), each shipping unit must be visually identified as being on hold.</p>
Inventory Checks	<p>All locations must conduct daily verification on facility operating days until the hold is closed.</p> <p>Documentation of daily inventory from off-site locations must be communicated in writing to Kraft Heinz. The off-site location informs Kraft Heinz in writing when they are not operating.</p> <p>The inventory documentation must account for physical quantities present on site, inventory present in the local Warehouse Management System (WMS), and be reconciled against original hold quantities. The reason for changes in inventory (e.g. receipt of in transit items and customer returns) must be documented and communicated to Kraft Heinz. Production components (when applicable) and finished good quantities must be fully reconciled.</p>	<p>All locations must conduct inventory verification at a minimum every 14 days or at close-out of hold event if sooner.</p> <p>Upon request inventory is required to be communicated in writing to Kraft Heinz.</p> <p>The inventory must account for physical quantities present on site, inventory present in the local Warehouse Management System (WMS), and be reconciled against original hold quantities. The reason for changes in inventory must be documented including receipt of intransit items and customer returns.</p> <p>Acceptable inventory verification procedures: o Relocating to a restricted area (e.g. trailer or cage), then inventory can include confirming the lock or seal is intact. The lock or seal used must be of</p>	<p>All locations must conduct inventory verification at a minimum every 14 days or at close-out of hold event if sooner.</p> <p>Upon request inventory is required to be communicated in writing to Kraft Heinz.</p> <p>The inventory must account for physical quantities present on site, inventory present in the local Warehouse Management System (WMS), and be reconciled against original hold quantities. The reason for changes in inventory must be documented including receipt of intransit items and customer returns.</p> <p>Acceptable inventory verification procedures: o Relocating to a restricted area (e.g. trailer or cage), then inventory</p>

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	<p>Acceptable inventory verification procedures:</p> <ul style="list-style-type: none"> o If non-conforming product or material is relocated to a restricted area (e.g. trailer or cage), then daily inventory can include confirming the lock or seal is intact. The lock or seal used must be of the type that to open the area the seal must be broken or a controlled key program. If the area is opened for any reason, a physical inventory of product in the area must occur to prevent usage and shipment. o If product or material is segregated in a bay and the entire bay is secured, then pallets don't need to be removed if the number of full pallets within the location is known. Partial pallets must be removed to verify the original number of cases. If the site can confirm that no cases have been removed then the product or material does not need to be removed from the bay. <p>For Laser Guided Vehicle areas and Automated Storage Retrieval System that do not safely allow for physical inventories, physical inventory is not required but an alternate method to verify control must be in place and agreed to by Kraft Heinz.</p>	<p>the type that to open the area the seal must be broken or a controlled key program.</p> <ul style="list-style-type: none"> o If product or material is segregated in a bay and the entire bay is secured, then the number of full pallets within the location must be known. Partial pallets must be removed to verify the original number of cases. If the ticket number and that no cases have been removed can be confirmed then the inventory does not need to be removed from the bay. o For Laser Guided Vehicle areas and Automated Storage and Retrieval System that do not safely allow for physical inventories, physical inventory is not required. 	<p>can include confirming the lock or seal is intact. The lock or seal used must be of the type that to open the area the seal must be broken or a controlled key program.</p> <ul style="list-style-type: none"> o If product or material is segregated in a bay and the entire bay is secured, then the number of full pallets within the location must be known. Partial pallets must be removed to verify the original number of cases. If the ticket number and that no cases have been removed can be confirmed then the inventory does not need to be removed from the bay. o For Laser Guided Vehicle areas and Automated Storage and Retrieval System areas that do not safely allow for physical inventories, physical inventory is not required.
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- If storage conditions preclude the use of a segregated and secured hold area, or if visual identification or physical obstruction is justifiably not feasible due to quantity/storage constraints, then there must be a defined and effective system in place to assure inadvertent movement or loss of control will not occur. In such a case, the justification must be fully documented, substantiated, and agreed to by (*refer to RACI Chart*)
- Complete evidence/documentation of destruction (e.g. certificates), including identification of materials and products destroyed, must be retained. Upon request, this documentation must be provided to Kraft Heinz. Required elements for certificates of destruction include:
 - Name of company who completed the destruction,
 - Quantity and unit of measure,
 - Description of the material,
 - Traceability information (batch number, lot code, and/or code date),
 - Method of destruction (e.g. landfill, shredding, incineration),
 - Date of destruction,
 - Name of hauling company,
 - Name, title, signature of destruction/recycling company representative
- Category 1 product destruction must be supervised (e.g., ridealong or equivalent) to assure the product cannot re-enter the distribution chain and photographic/video evidence must be obtained.
- Any labelled material or product sent for destruction or animal feed must be disfigured or destroyed to assure that Kraft Heinz Trademarks cannot be reused in any manner.
- Only Kraft Heinz approved contractors or third parties must be authorized to manage transportation and destruction of non-conforming product.
- All product sent for destruction that is unfit for human or animal consumption must be identified in the accompanying documentation.
In the case of destruction by a third party, the contract with the third party must specify the method of destruction, security measures, verification of destruction, final destination of the nonconforming

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product including company name and contact, and regulatory and environmental requirements must be met.

8.2 - Returns

A procedure for handling returned materials and products must be in place to prevent re-entry in the distribution chain.

- Drivers must not accept returns from delivery points unless authorized in advance by (*refer to RACI Chart*). (Returns do not include deliveries or part deliveries which are not accepted by the customer).
- There must be a documented inspection and assessment completed by trained representative (e.g., Warehouse Operator) to determine product disposition. See Section 7.5 for Product Receiving Requirements and Appendix for Returned Products Inspection Assessment and Transportation Incident-Product Assessment.
- Kraft Heinz must be notified (*refer to RACI Chart*) of all returns. Returns must be clearly identified, segregated from regular materials or products, and placed on hold until inspected and dispositioned by Kraft Heinz authorized personnel (*refer to RACI Chart*).
- Returned product as a result of, including but not limited to, temperature abuse, accidents, security incidents (theft, damage, unauthorized intrusions), customer or consumer complaints including pest issues or product tampering, catastrophe (fire, flood), recall, must be held as a potential food safety issue and Kraft Heinz (*refer to RACI Chart*) must provide disposition.
- Returned product inventories must be reconciled at the time when final disposition is implemented and at any inventory count action taking place before final disposition.

8.3 – Internal Audit & External Audits

Internal Audit

- An internal audit program must be established, documented and maintained to verify the effectiveness of the quality system.
- Where the Operator has a quality management system that is registered under the ISO QMS standard, all requirements for internal audit given in the standard must be met.
- Where the Operator does not have a quality management system which is registered, sufficient internal verification activity must be carried out to assure that Kraft Heinz requirements are met (minimum review each two years).
- Corrective actions identified during both internal and external (e.g., third party) audits must form part of the audit report and responsibility for tracking corrective actions to close-out must be identified

External Audits

- All facilities must have effective programs for managing audits conducted by third parties in areas where Kraft Heinz products are managed. This must include but is not limited to:
 - Appropriate controls to restrict disclosure of confidential and/or proprietary Kraft Heinz information, products and processes.
 - Follow up and closure of any non-conformances.
- Notification to Kraft Heinz of any serious issues identified during the audit. Corrective actions identified during both internal and external (e.g., third party) audits must form part of the audit report and responsibility for tracking corrective actions to close-out must be identified
- Provider is also required to undergo an annual External Audit by an auditor approved by Kraft Heinz North America. Auditor will complete and distribute the audit reports with follow up documentation. Auditor will coordinate the official close-out including corrective action, and will verify corrective action completion. If necessary a re-audit may be scheduled. Provider shall bear the cost of said re-audit and a copy will be furnished to Kraft Heinz North America.

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- Facilities in which “exposed” meat is handled will need to receive a Kraft Heinz audit (which may be performed by a 2nd party).
- All other facilities (i.e. Storage, Buffer) may be audited by a qualified Kraft Heinz employee using the Kraft Heinz Audit Checklist.

Short Term Projects

For short term projects (i.e. 3-6 months), a qualified individual may inspect the warehouse using the Golden Rule Checklist and accept the contract.

- If the site is inactive for one year or longer, it must be qualified again prior to use. If the site is in use for greater than six months, the site needs a full audit.

New WH/RP Site

- Requestor completes Audit Request Form (page 42) then sends the completed form to the Warehouse Team when a site is ready to be officially audited – a minimum of 1 months’ notice is required.
- For new WH/RP facilities without activity (i.e. new building), the audit cannot be performed prior to commercial operation because product handling.
- For new WH/RP with activity (new to Kraft Heinz but existing for other customers), the audit or technical visit and approval must be achieved prior to commercial operation.

Acceptance of GFSI Audits

GFSI audits will be accepted once the Warehouse requirements are fully benchmarked. The full audit report must be provided for review to WH or Corporate Quality for approval. In some situations, a Kraft Heinz audit may still be required.

8.5 - Corrective and Preventive Action

Corrective action must take place (but is not limited to) when:


- A non-conformity relating to product or product handling caused by the Operator led to a hold (e.g., interruption of cooling chain)
- Quality system failures lead to non-compliance with Kraft Heinz Warehouse, Handling, Storage, Repacking and Transportation Quality Requirements or regulatory requirements.
- Regulatory authorities identify conditions that may violate laws or regulations. The Kraft Heinz contracting representative must be notified of violations that directly or indirectly impact products stored for Kraft Heinz and the actions taken to correct the violation and prevent reoccurrence.

In such cases, a root cause analysis must be conducted, actions taken to prevent recurrence, and documentation to reflect the corrective and preventive actions. Corrective Actions must be tracked, monitored and closed out.

Requirements Specific to Refrigerated Warehouses

Refrigerated warehouses will meet the requirements set out in the Federal Food, Drug, and Cosmetic Act and implementing FDA regulations, including 21 C.F.R. 117.206:

- Establish and implement temperature controls to meet Kraft Heinz product specification
- Monitor the temperature controls with sufficient frequency (minimum monthly) to provide assurance they are consistently performed.
- If there is a problem with temperature control for refrigerated packaged food:
 - Hold product until disposition is provided by Kraft Heinz Quality (*refer to RACI Chart*)
 - Correct the problem and reduce the likelihood that the problem will recur
 - Provide risk assessment information to Kraft Heinz Quality so food can be evaluated for safety

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- Verify the temperature controls are consistently implemented by:
 - Calibrating temperature monitoring and recording devices
 - Reviewing records of calibration within a reasonable time after the records are made
 - Reviewing records of monitoring and corrective actions taken to correct a problem with the control of temperature within a week after the records are made
- Establish and maintain the following records:
 - Records documenting the monitoring of temperature controls for any such refrigerated packaged food
 - Records of corrective actions taken when there is a problem with the control of temperature for any such refrigerated packaged food

Confidentiality

- All sites must establish systematic procedures for the management of confidentiality when working with outside parties. Confidentiality may be required by either party to prevent the unintentional disclosure of customer confidential information or disclosure of Kraft Heinz confidential information.
- Where confidentiality is required by Kraft Heinz it will be specified in the contract. If any pre-existing confidentiality agreement is in place this must be reviewed to assure that the new information being exchanged is covered by the terms of the agreement. Procedures must be in place to assure the adequate documentation of confidentiality is completed prior to the exchange of information.
- Any information that is already in the public domain cannot be subject to Confidentiality.

Additional Communication with Kraft Heinz:


The company must have a system in place to notify in writing the Kraft Heinz contracting representative (*refer to RACI Chart*) prior to any changes in packaging, production facility or processes that may impact the quality, labelling or functionality of a finished product.

Roles	
QA	Quality
WO	Warehouse Ops
REG	Regulatory
SAN	Sanitation

R = Responsible for action. R can be shared
A = Formally approves and documents the decision - has yes/no or power of veto. Not usually shared
C = Consulted about decisions/actions (2 way interaction)
I = Informed after a decision is taken.

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Section of this Manual		R	A	C	I
Food Regulatory					
1	Notified upon arrival of Food Regulatory inspection relating to KHC materials or products.	REG QA WO	REG QA WO		
2	Notified immediately if Food Regulatory investigator presents a court issued warrant.	REG QA WO	REG QA WO		
3	Notified if any product stored for KHC is sampled by a regulatory agency.	REG QA WO	REG QA WO		
4	Notified if regulatory inspector photographs any KHC property or product.	REG QA WO	REG QA WO		
5	Contacted if questions arise during a regulatory inspection specific to Kraft Heinz products or policies.	REG QA WO	REG QA WO		
Good Warehouse Procedures (GWP)					
6	Request approval for recouping items under USDA jurisdiction (e.g., meat, poultry)	WO QA		REG	
Pest Control					
7	Contacted to request use of pesticides that are Bad Actors on the PAN list, avicides or rodenticide.	QA	SAN		
8	Notified in the case of insect, rodent or bird escalation.	QA WO		SAN	
Product Realization					
9	In cases where the Operator receives complaints from a Kraft Heinz customer, notification should be made within 24 hours.	WO		QA	
Product Receipt and Shipping Controls					
10	Inbound and outbound vehicles must be inspected and verified to be clean, dry, free from leaks, off-odors and unusual residual materials (powder or liquid) prior to loading/unloading. This inspection must be documented. If a load is suspected of being contaminated, unfit, or otherwise unacceptable, notification must be made.	WO			QA
11	Products damaged due to moisture, condensation, water, etc. must be destroyed (e.g., landfill or placed in the compactor) unless an alternative method of disposition is approved.	WO		QA	

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12	Theft of a full trailer or partial trailer load from the Warehouse must be reported within two hours of the first evidence of the occurrence.	WO		QA REG	
13	Equipment received with broken, missing, or unreadable seals, or seal numbers that do not match the BOL, shall be rejected until a risk assessment completed to determine the potential for loss, damage, or product tampering.	WO			QA
14	In the event there is other evidence of unsatisfactory shipping practices or tampering, then the materials must be immediately placed on hold and contact?	WO			QA
15	Visual or Odor Contamination – For LTL shipments of food products that may be on same trailer with chemicals, unload the materials and place into inventory on Hold. (In most cases, these products are shipped FOB Origin and belong to Kraft Heinz.). If the carrier appears to be at fault, file a proper claim. Contact Kraft Heinz Carrier Claims for disposition.	WO			QA
16	Procedures for dealing with vehicle or refrigeration systems breakdown must be in place, and include notification to Kraft Heinz warehouse management.	WO			QA
17	If there are signs of temperature abuse or if the set point or reading temperature is not consistent with the product specification, the product must be placed on hold and approval must be obtained.	WO			QA
Identification & Traceability					
18	If the result of a periodic recall exercise does not yield 100% accuracy within 3-4 hours notify:	WO			QA
Control of Monitoring Devices					
19	When measuring equipment is found to be out of standard, a risk assessment must be completed to determine any product implications regarding food safety, quality or regulatory and notification made to:	WO			QA
20	Notify in cases of equipment or calibration failure.	WO			QA
Control of Non-Conforming					
21	Questions regarding disposition of product	QA		WO	
22	Hold inventory reports	QA WO			
23	Where non-conformance is detected in products which are already in distribution	WO		QA	
24	Notify if any material or product stored for Kraft Heinz, or designated for shipment to a Kraft Heinz facility or to trade is inadvertently released from hold.	WO QA			

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25	Consult if not able to use a segregated and secured hold, or if the usual identification is justifiably not feasible due to quantity storage constraints.	WO			QA
Returns					
26	Drivers must not accept returns from delivery points unless authorized in advance by the Kraft Heinz contracting manager, Kraft Heinz warehouse manager, or Kraft Heinz National Claims Center.	WO			QA
27	Kraft Heinz management must be notified of all returns. Returns must be clearly identified, segregated from regular materials or products, and placed on hold until inspected and dispositioned by Kraft Heinz authorized personnel.	WO			QA
External Audits					
28	If Regulatory authorities identify conditions that may violate laws or regulations. Kraft Heinz must be notified of violations that directly or indirectly impact products stored for Kraft Heinz and the actions taken to correct the violation and prevent reoccurrence.	QA WO REG			
Refrigerated Warehouses					
29	If there is a problem with temperature control for refrigerated packaged food, product should be held until disposition is provided.	WO		QA	
Repackers					
30	The company must have a system in place to notify in writing the Kraft Heinz contracting representative prior to any changes in packaging, production facility or processes that may impact the quality, labelling or functionality of a finished product.	WO		QA	
Organic					
31	Organic products inadvertently exposed to prohibited substances (such as the pesticides used in fogging) must be placed on Category 1 Quality Hold. The facility should then contact Kraft Heinz for disposition	WO QA			

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Appendix 1 – Further Requirements for Re-packers

Specifications

- The company must assure that authorized Kraft Heinz instructions and /or specifications (reviewed and signed by authorized Kraft Heinz representative) are in place at the production location.
- The company must have policies and procedures in place to assure products meet all Kraft Heinz specifications.
- All specification changes must be approved by Kraft Heinz.

Materials Receipt

- Conformance to specification must be verified for all applicable incoming materials.
- Any damaged or non-conforming stock must be held and Kraft Heinz notified.

Training

- For sites that manage allergen labelling as a control point, employees must receive annual Allergen training related to the program including monitoring, documentation, verification, and corrective actions if the controls are not met.

Sanitation and Equipment Design:

- Dedicated tools and equipment must be used for sanitation and managed to avoid contamination of product and packaging materials.
- Equipment surfaces must be made of suitable materials to avoid damage to product and primary packaging quality (e.g., easy to clean, smooth and in good condition).

Packaging and Label Control

The company must have controls in place to assure proper labelling of products supplied to Kraft Heinz.

- Packaging materials must be purchased according to documented, Kraft Heinz approved specifications.
- All labels must be reviewed and approved by Kraft Heinz before use.
- Packaging and labels must be verified against the Kraft Heinz approved version of the specification prior to use.
- No changes must be made to labels without prior authorization from Kraft Heinz.
- Kraft Heinz Packaging must only be used for Kraft Heinz products.
- Controls must be in place to assure that correct finished product labels are applied to products (e.g., periodic label verifications, copies of labels saved with production records, a full review of control documents at the end of shift, documented label inventory control procedures). Where packages are similar, but allergen profiles are different, a risk assessment must be carried out to determine whether additional control measures, such as bar code readers to link the label to the corresponding product must be implemented.
- For the following scenarios, application of correct labels must be verified:
 - Where labels for different varieties have similar appearance
 - Where products with dissimilar allergen profiles are packaged into a new consumer unit and re-labelled
- Destruction of obsolete or defective Kraft Heinz labels or packaging materials containing the Kraft Heinz identification must have prior approval from the Kraft Heinz contract representative. Labels, cartons or caps that will not be used, or are obsolete must be destroyed to prevent unauthorized use. Any labelled finished product which is discarded must also be disfigured or destroyed so that the container, label or cap cannot be re-used.

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Process Control

- Appropriate production personnel must have access to the latest specifications and/or work instructions for re-packing products supplied to or manufactured for Kraft Heinz.
- A process for routine inspection to ensure conformance to specifications during production for Kraft Heinz must be established, documented and implemented.

Net Contents Control

- Packages that declare a piece count must be correct for each package.
- Net content in an established compliance lot must, on average, equal or exceed the declared label quantities at the point of manufacture.
- Individual packages must be controlled to avoid underweights as defined by applicable regulations.
- Where net weights are determined indirectly, tare weight determination and monitoring must be specified in the site net content plan.

Traceability and Shelf Life

- All finished product consumer packages will bear information applied to the package that allows effective product traceability to product date and location. This must include at a minimum: site identifier (see below), **Open date**, and shift (if applicable). Where products are produced on more than one line in a facility the line designation must also be added.
- A recall code including a site identifier, which is assigned by Kraft Heinz, must be used for traceability of a product's manufacturing origin and is required to be applied to:
 - Each pallet
 - Each site generated Stock Keeping Unit (SKU)
 - Each site generated Consumer Unit
- Packages that are reconfigured (combined or consolidated) into new consumer sale units must have traceability maintained for all components. For example, when several packaged products are combined or wrapped together to make up a variety pack the site must log the production dates of the individual packages going into the variety pack on a particular line, day, and shift).
- Where packaging or labels that contain consumer information (e.g., allergen statements, nutrition, etc.) are applied to a reconfigured customer unit, the traceability of these materials must also be maintained.
- For packages that contain more than one component (e.g., variety packs, sauce pouches, spice packets, etc.) or mixed code dates, the shelf life indication data of the finished package must be the same as the component with the earliest expiration date (i.e., shortest shelf life indication).
- Packages that contain multiple smaller packages designed to be sold individually or as a single unit must have the shelf life information marked on both the multi-pack and the individual components contained within.

Supplier Quality Management

- Quality requirements and specifications in accordance with Kraft Heinz Quality requirements must be documented and address the programs and controls that suppliers must have in place to assure the safety, quality and regulatory compliance of purchased goods that will be used for Kraft Heinz products.
- A procedure must be in place to approve suppliers, including a process for qualification, evaluation, approval, and maintenance.

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HACCP

- Must assess and document a Food Safety Plan as required by the Federal Food, Drug, and Cosmetic Act and implementing regulations, including 21 CFR Part 117.
- Repacking facilities must assess and document the assessment for each new product to determine if the process introduces any additional food safety risks. Most of these risks can be controlled through good prerequisite programs. However, the following cases are examples of controls that must be carefully considered and may be managed as Preventive Controls:
 - Repacking of products with dissimilar allergen profiles that require a new label
 - Product handling outside its specified temperature and humidity requirements
 - Handling of breakable items (e.g., ceramic mugs, glass jars, etc.)

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Appendix 2 – Definitions

- **Re-Packer:** Supplier who receives packed finished products and reconfigures them into a new trade unit of sale. There is no direct handling of open/exposed product. Note: In certain Kraft Heinz functions this can be referred to as a “Co-Packer”.
- **Contract Packer (Co-Packer):** Supplier who conducts the primary packaging operation for Kraft Heinz branded finished products; they receive a “consumer-ready” work in process (WIP) and perform no additional processing but conduct the final open/exposed product operation. Supplier who receives semi-finished products and reconfigures them into a trade unit of sale, Kraft Heinz branded. Co-packers are held to the requirements set forth in the Co-Pack Quality Standards.
- **Disposition:** Determining and authorizing what must be done with product, ingredient or packaging which has been placed on hold. Examples would include:
 - Accept – may be sold through normal channels
 - May be further processed by Rework, repair or reclaim to meet specifications
 - May be accepted, with or without further processing, for alternative applications (Re-graded, for example to liquidation or distressed sales)
 - Reject or scrap. Destruction of products and packaging must be carried out in a secure manner to prevent recovery or re-use.
- **Extraneous Matter:** Any object or matter which 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; animal parts; plastic; paper and extraneous matter inherent to raw materials (bone, nut shells, etc.)
- **Food Defense:** Safeguarding the food supply against intentional acts (or threat of an act), such as mass contamination and product tampering. Food Defense should not be confused with Food Security which, as defined by the World Health Organization (WHO), includes concerns about the availability of a sufficient national food supply.
- **Government Regulations:** The laws and regulations of the location in which products are stored and the laws and regulations of the destination to which products may be shipped.
- **HACCP (Hazard Analysis and Critical Control Points):** A system identifying specific hazard(s) and preventative measures for their control.
- **Hazard:** The potential to cause harm. Hazards can be biological, chemical or physical.
- **Hold:** A status assigned to specified product indicating it must all remain stopped from normal handling processes until further notice. Synonyms include: quarantined, blocked, segregated, contained, embargoed, etc.
- **Lot:** A unique identity given to a defined quantity of a material usually based on time and location of manufacture. For continuous processes, a lot cannot 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 would usually be identified as the contents of the bulk vehicle.
- **Non-Conforming:** Non-fulfilment of a need or expectation that is stated, generally implied, or obligatory
- **Operator:** Any Kraft Heinz department or third party company providing a service (e.g., storage, transport) involving the handling of Kraft Heinz products/raw materials.
- **Packaging Component:** All elements of packaging including adhesives, labels, inks, dyes and stabilizers.
- **Pathogen:** Foodborne microorganism recognized as a hazard that can cause illness or death.
- **Pesticides:** Compounds classified as such by the regulatory authorities of the location where stored and the destination to which products 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.

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- **Product returns:** Within Kraft Heinz Control: Third party warehouses directly contracted to Kraft Heinz, including the warehouses of re-packers, and with systems approved by Kraft Heinz audit are considered to be within Kraft Heinz control. Outside Kraft Heinz Control: Product returned from trade or customer's own warehouses, distributors or stores.
- **Purchased Materials:** equipment, services or materials purchased for use in the Kraft Heinz operations.
- **Quality Program:** A logical sequence of actions designed to assure specific product quality specifications are met.
- **Quality Records:** Documents detailing the history of a lot of finished product, distribution steps, control charts, inspection results, amount stored, formal releases and disposition.
- **Quality System:** Organizational structure, policies, programs and procedures needed to manage product quality.
- **Regulatory Action:** A seizure, embargo, or hold of any product or a prosecution, injunction, citation, regulatory letter or notice of adverse findings initiated by a federal, state, or local regulatory authority or any federal, state, provincial or local court.
- **Regulatory Authority:** Any duly authorized agent or employee of any government agency empowered to enforce laws relative to food products. Any religious organization that defines requirements for special product certification (e.g., Kosher).
- **Regulatory Contact:** A visit, inspection, audit, survey, inquiry or other contact by any regulatory authority that results in the identification of objectionable conditions that require a response. This does not include those visits made on a regular basis (i.e., daily, weekly, monthly); unless such a visit alleges a material or product destined for a Kraft Heinz facility is not in compliance with applicable laws or regulations.
- **Risk:** An estimate of the likely occurrence of a hazard or illness.
- **Special Situation:** A Special Situation includes any product, facility issue or set of circumstances that has the likely potential to expose:
 - Consumers, employees or other individuals or entities or the environment to injury, loss, harm or damage, or
 - Kraft Heinz, its employees, products, or tangible or intangible assets to serious legal or regulatory liability, severe adverse publicity, sustainable negative public opinion or damage to the reputation of the company, or
 - Kraft Heinz business operations to severe disruption.
- **Suitable Facility:** A facility in which the design, layout and utilities meet all Good Warehousing/ Distribution Practices (GWP), industry standards and present no food safety or other risk to Kraft Heinz.
- **Traceability:** The ability to track a specific lot of ingredient/component to the product that contains it; and to track a finished product to the primary external customer(s) or destination(s).
- **Tankers:** closed bulk haulage

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Appendix 3 – Food Defense and Supply Chain Security

Warehouses, carriers, and repackers acting on behalf of Kraft Heinz and that pack, or in any way handle, ingredients or final product will develop written specific procedures to secure Kraft Heinz product and to deter and prevent intentional contamination. Warehouses, carriers and repackers must have written protocols in place to quickly and accurately identify respond to and contain threats or acts of intentional contamination. Likewise, warehouses, carriers, and repackers will ensure their suppliers and supply chain partners employed on their behalf adopt similar protocols and implement appropriate controls.

The laws and government expectations regarding Food Defense vary from country to country. Kraft Heinz has defined a minimum set of Food Defense standards to help us meet legal and consumer expectations and the site-specific controls are detailed below. The standards may exceed the requirements of a specific country or area.

Note that in addition, the US Customs-Trade Partnership against Terrorism (C-TPAT) program forms part of the Customs and Border controls for the USA and is designed to promote supply chain security. It includes specific mandatory criteria for different types of activities. C-TPAT and Food Defense are mutually supportive, although separate programs, formed and enforced under different elements of US legislation. Both are mandatory for manufacturers, warehouses, carriers, handlers and/or shippers of Kraft Heinz product to the USA.

(1) Warehouse, carriers, and repackers acting on behalf of Kraft Heinz who are based in the US, or who are handling or shipping materials or finished product destined for the United States, are expected to meet the requirements detailed below and must be prepared to provide Kraft Heinz confirmation, through audit as required, that they have done and will continue to do so:

1. Adopt and maintain a facility Food Defense program (outlined at (3) below).
2. FDA facility registration.
3. One-Up-One-Down records maintenance. Maintain records to identify the immediate previous source of food or ingredient received and the immediate subsequent recipient of food or ingredient shipped.
4. Detained product. Ensure detained product is held as directed by Kraft Heinz (See Chapter 8 – Measurement, Analysis and Improvement).
5. Meet C-TPAT Minimum Security Criteria if making shipments to the US or Canada but originating elsewhere.
6. Container Security. When transporting a container or trailer for a C-TPAT importer, a tamper evident high security seal that meets or exceeds the current ISO 17712:2013 standards for high security seals must be utilized.

(2) Warehouses, carriers, and/repackers based outside the US and/or that do not ship or handle product destined for the United States are expected to develop facility Food Defense programs that meet the minimum set standards (outlined below) and must be prepared to provide Kraft Heinz confirmation, through audit as required, that they have done and will continue to do so.

(3) A Food Defense Program must include the following:

1. Program Administration
 - (a) A documented plan (see <http://www.fda.gov/Food/FoodDefense/default.htm> for guidance) that explains the site's Food Defense procedures and strategies.
 - (b) Clearly-defined roles and responsibilities of those individuals responsible for maintaining the program.
 - (c) Procedures for reporting threats or acts of intentional contamination to Kraft Heinz and

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others (as required by applicable law).

(d) Annual vulnerability self-assessments and procedures for fixing gaps.

2. Access control. An access control system will deter people with the intent of harming our products from gaining access to do so. Warehouses, Carriers, and Repackers must implement systems and procedures to identify people who are regularly on site (e.g., employees and contractors) as well as 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. Warehouses, Carriers, and Repackers will conduct background screening checks on employee candidates. Applicable law will dictate what kind of background checks can be conducted. In the US, criminal checks, reference and qualification checks, and drug screening are routine and typically addressed in contract language.

4. Shipping and Receiving. The Warehouse, Carriers, and Repackers must take deliberate steps and implement procedures to monitor and verify the integrity of incoming and outgoing shipments. This includes the requirements described in Sections 7.5 (Product Receipt and Shipping Controls) and 7.6 (Storage).

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Appendix 4 Organic Pest Control Guidelines

Organic pest control regulations are not always well defined and differ between countries. Since differences of interpretation occur, this document outlines the basic expectations for organic control of pests.

1. Efforts must be taken to avoid pesticide use in facilities that handle organic foods by employing non-pesticide control methods. The methods listed below must have been applied prior to resorting to pesticides. These include:
 - 1.1. Removal of pest habitat, food sources, and breeding areas
 - 1.2. Prevention of access to handling facilities
 - 1.3. Management of environmental factors, such as temperature, light, humidity, atmosphere, and air circulation, to prevent pest reproduction
 - 1.4. The use of mechanical or physical controls including but not limited to traps, light, or sound, lures and repellents using non-synthetic or synthetic substances consistent with the National Organic Program National List of acceptable materials
 - 1.5. If these practices are not effective in preventing or controlling pests, a non-synthetic or synthetic substance consistent with the US National List may be applied. For the US National List visit the NOP website at [USDA National Organic Program](http://www.usda.gov/nop).
2. Different certifying agencies may establish different measures for the same type of pesticide application and for this reason it is essential to work with the Country or local regulatory bodies.
 - 2.1.1. Organic products inadvertently exposed to prohibited substances (such as the pesticides used in fogging) must be placed on Category 1 Quality Hold. The facility should then contact Kraft Heinz for disposition (*refer to RACI Chart*).
 - 2.2. Partial pallets
 - 2.2.1. Partial pallets must be given the same type of protection by draping a poly bag/tarp over the top of the partial pallet, ensuring that all product is covered top to bottom, and side to side (i.e., no voids or gaps.)
 - 2.2.2. The base of the poly bag/tarp must then be secured to the bottom of the pallet using tape or straps. Readily available packing materials such as freezer bags may be used for this purpose, provided that the facility takes appropriate steps (e.g., marking) to prevent the reuse of contaminated materials on organic items.
 - 2.2.3. Removal of the partial pallets from the area to be treated is an alternative to covering (see section A: 1& 2 above).
 - 2.3. Pheromones are acceptable to monitor pest activity.

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Attachment A

Acknowledgement of Receipt of and Compliance with the Requirements of the Kraft Heinz North America Warehouse Requirements Manual.

Please sign this page and return to Kraft Heinz North America as acknowledgement that your company has received this document and agrees to comply with all requirements stated within.

Company Name: _____

Print Name: _____

Signature: _____

Title : _____

Date: _____

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AUDIT REQUEST FORM

Requester Information:

1	Audit Requester Name	
2	Audit Requester Phone Number	
3	<i>Kraft Heinz Quality Support Name</i>	
4	<i>Kraft Heinz Quality Support Name Phone Number</i>	
5	<i>Kraft Heinz Quality Support Name email</i>	
6	Requested audit date (by when)	
7	Required audit date (latest possible date for audit to be completed by)	
8	Facility Type (Distribution/Warehouse, Repacker)	

Facility Information:

9	Facility Name (Business Name)	
10	Facility Street Address	
11	Facility City	
12	Facility State/Province	
13	Facility Postal/Zip Code	
14	Facility County	
15	Facility Contact Name	
16	Facility Contact Phone Number	
17	Production Facility Contact e-mail Address	
18	Send Invoice Information to:	


Audit Information:

19	Does this facility require a signed confidentiality agreement by the auditor, to conduct the audit?	
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Product Information:

20	Product(s) to repacked / stored	
21	What other types of products does this facility manage?	
22	Type of warehouse (dry, conditioned, refrigerated, frozen)	
23	Type of distribution (direct store, distribution site, other)	
24	Repackers: Does the packaging material touch exposed food product or include an ingredient line declaration?	
25	Repackers: Will non-ambient (conditioned, refrigerated) product be re-packed? Does the packaging material include an ingredient line declaration?	
26	Will the line where the product is re-packed be in place and running by the requested audit date? (If not, when?)	
27	Does the facility have a HACCP type risk assessment in place for the product to be repacked? (Required prior to audit.)	
28	Does the facility have a HACCP type risk assessment in place for the product to be stored? (Required prior to audit.)	
29	Date the Warehousing, Handling, Storage, Repacking and Transportation Expectations and Kraft Heinz?	

Logistics Approval (if needed) _____

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Revision Log:		
Date Revised:	Supersedes:	Summary of Revision:
10/26/2017	New	Harmonized Kraft Heinz Manuals