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# **FOOD SAFETY RULES for STEF Group Suppliers**

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# FOOD SAFETY RULES for STEF Group Suppliers

## Subject

As a specialist in the transport and logistics of temperature-controlled food products, the STEF Group places the Food Safety and Food Defense of its products at the heart of its concerns.

For this reason, the present Document describes the principles and requirements that Suppliers are bound to follow and respect in terms of Food Safety and Food Defense.

**NB:** By suppliers of the STEF Group we mean companies providing services on behalf of one or more companies included in the STEF company's reporting entity.

## Values and Principles

The STEF Group operates in accordance with 4 values: Enthusiasm, Respect, Reliability and Performance. These Values are the guiding principles of our company and the foundation of our customers' trust.

Our business is to store and/or transport the goods entrusted to us, under the conditions expected and defined with our customers in compliance with strict requirements.

You are directly or indirectly involved in the successful completion of our missions, which is why your operations must contribute to ensuring that the goods remain:

- **Undamaged** (degradation is an entry point to the food product and a commercial disadvantage)
- **Free from any contamination** (physical, (micro)biological, chemical and allergenic) induced by your activities, staff, facilities, materials/equipment or vehicles
- in **optimal storage conditions**
  - Respect of the Cold Chain (adapted temperature)
  - Compliance with traceability and stock management rules
  - Respect of the announced lead times

## Application

As a STEF Supplier, you contribute to the quality, safety and security of the services we provide to our customers. Thus, you must :

- comply with the principles and requirements set out below
- implement the good practices shared in this document
- inform us, without delay, if you are unable or likely to be unable to comply with them.

These requirements and good practices are detailed in 6 thematic chapters describing the specific obligations you must respect. They are adapted to the operations you carry out for us.

<b>A : REGULATORY COMPLIANCE</b>	<b>B : CONTROL OF RISKS IMPACTING FOOD SAFETY</b>
<b>C : HYGIENE</b>	<b>D : TEMPERATURE COMPLIANCE</b>
<b>E : TRACEABILITY, REACTIVITY AND TRANSPARENCY</b>	<b>F : PREVENTION OF MALICIOUS ACTS (FOOD DEFENSE &amp; FOOD FRAUD)</b>

We would like to point out that this document does not replace any contracts, agreements or commitments you may have with STEF, but specifies our minimum requirements in terms of Food Safety and Food Defense. **Thus, you must apply the most stringent requirements contained in the documents that bind you to STEF.**



In addition, if you need to use a subcontractor to carry out the operations we entrust to you, you will have to ensure that you have STEF's explicit agreement in advance and provide us with proof that the subcontractor complies with all our requirements and good practices.

Consequently, this document commits you, at any time and upon request, to prove to STEF that our principles, rules, requirements and good practices are respected, by the means and the methods that we consider most appropriate (request for supporting documents, queries, audits, etc.). Any discrepancies will be assessed by STEF and will lead to a graduated and adapted response: additional information, action or progress plans, etc., which may go as far as reviewing our commercial relationship.

## Limitations

Since no document can foresee or deal with all the situations that may arise, you should ask yourself the following questions if you do not find suitable instructions in the 6 thematic chapters below:

1. Is it legal?
2. Is this in line with the principles and values set out in this Document?

If you answer "NO" to at least one of these 2 questions, then do not implement your solution/service as it stands and adapt it so that your 2 answers are positive.

### **Suppliers directly concerned by these requirements are those who carry out the following operations on our behalf:**

- Transport, Groupage and/or Distribution
- Storage, order preparation, freezing/thawing, co-packing and/or packaging
- Provision of personnel: temporary employment agency, group of employers, cooperatives, security surveillance company...
- Technical interventions: scheduled or punctual maintenance
- Cleaning of floors, premises and/or vehicles
- Cleaning of work clothes
- Pest control: deratting, disinsectisation

## Rules applicable to the suppliers concerned

<b>Transport And/or Groupage /Distribution</b>	<b>Storage and/or Order preparation and/or Freezing/thawing and/or Co-packing and/or Packaging</b>	<b>Provision of personnel</b>	<b>Technical interventions</b>	<b>Cleaning of vehicles, soils and premises</b>	<b>Cleaning of work clothes</b>	<b>Deratting / Disinsectisatio / Sanitation</b>
A1 A2 A3 A4	A1  A3 ((if the operations are not carried out at STEF) A4	A1  A4	A1  A3 (if applicable) A4	A1  A4	A1  A4	A1  A4
B1  B3 B4 B5 (if break of load) B6 B7 B8 B9  B12	B1  B3 B4 B5 B6 B7 B8 B9	      B8	B2 B3 B4  B7 B8  B10 B11	B2 B3 B4  B8  B11	B2 B3 B4  B8	B2 B3 B4  B8  B10 B11
C1 C2 C3 C4 (if break of load) C5 C6 C7 C8 C9 C10 C11 (if applicable)	C1 C2 C3 C4 C5 C6 C7(if applicable) C8 C9 C10 C11	C1 (if applicable)      C11	C1 C2  C5  C9 C11	C1 C2 C3  C5  C10 C11	C1 C2  C5 C6  C10	C1 C2  C4 C5 C6  C8 C10
D1 D2 (if break of load) D3 D4 D5 D6 D7 D8	D1 D2 D3 (if applicable) D4 D5 D6 D7 D8 (if applicable)	Not concerned	   D5 (if applicable)	Not concerned	Not concerned	Not concerned
E1 E2 E3 (if break of load) E4 E5	E1  E3 E4 E5	E1	E1	E1	E1	E1
F1 F2 (if applicable) F3 (if applicable) F4 (if applicable) F5 (if applicable) F6 (if applicable) F7 F8 F9 F10 F11 (if applicable) F12 F13 (if applicable) F14 F15 F16 (if applicable)	F1 F2 F3 F4 F5 F6 F7  F9 F10 F11  F13  F16	F2 (Surveillance)  F5  F7  F9	F3  F5  F7  F9  F16	    F7  F9  F13 (if applicable)  F16	F3  F5	       F9  F16

## Chapter A - REGULATORY COMPLIANCE

**Rules :** You must comply with international, national or local food and cargo safety regulations applicable to your activities, especially for services you carry out for STEF.

**Requirements - You must** - the parts in *italics* specify our requirements for operations within the European Union (EU)

**A1** - Comply with the food safety Regulations applicable to you

⇒ *in the case of the relevant activities carried out in the EU, EC Regulations No 178/2002, No 37/2005, be in possession of a European registration under EC Regulation No 852/2004 or an authorization under EC Regulation No 853/2004*

**A2** - Use vehicles and trailers adapted to the constraints of the goods and services we entrust to you (aptitudes for food contact and cleaning of the equipment and materials used, insulation, cold production,...).

⇒ *These vehicles must comply with the ATP agreement and the related periodic inspections if your activities are carried out in the EU*

**A3** - Install temperature recorders in temperature-controlled areas and use thermometers that meet current standards for initial compliance and periodic verifications

⇒ *for the EU and SWITZERLAND: standards EN n°12830, n°13485 and n°13486*

**A4** - Archive documents and supporting documents in compliance with the regulatory obligations in this area (archiving time, format, availability, etc.)

## Chapter B - CONTROL OF RISKS IMPACTING THE FOOD SAFETY

**Rules :** Before starting any operation, you must conduct a study to assess the dangers that threaten the safety of the goods and define and implement the necessary control measures. This study must be updated each time there are changes in relation to the operations or services you perform on behalf of STEF.

**Requirements - You must**

**B1** - Conduct a formalized HACCP study or have a *food safety approval under EC Regulation 853/2004*, integrating the activities carried out on behalf of STEF. This allows you to identify, evaluate and control significant food safety and security hazards. The HACCP plan must define Good Hygiene Practices in prerequisite programmes as well as a set of control measures that must be followed to ensure food safety and security. This study should focus on the 4 following hazard classes affecting the hygiene and safety of the goods: biological (viruses, micro-organisms, etc.), chemical (pesticides, additives, rodenticides, etc.), physical (foreign bodies, wood, glass, etc.) and finally those related to the main allergens. Train and sensitize your staff, as soon as they arrive and periodically thereafter, to the control measures you have defined - at least, if applicable, those of the STEF site you are on (**welcome booklet, good practices, procedures, instructions, directives, notices, etc.**) - and keep records of these measures.

**B2** - Conduct a formalized study to assess the hazards and associated risks related to your activities threatening the consumer health and the safety of goods (any recognized hazard analysis method is accepted), at a minimum and, if applicable, you must comply with the requirements, rules and good practices of the STEF site you are on

**B3** - Avoid any direct or indirect risk of contamination or deterioration of goods (related to equipment, clothing, processes, handling, etc.)

**B4** - Ensure the proper adaptation of materials, products and equipment, including protective equipment used

**B5** - Define a control procedure and records on receipt/shipment: identification of the vehicle, temperature, hygiene/odour, compliance and integrity with what is expected, including the management of deviations that can be observed

**B6** - Have implemented an applicable, functional and complete recall procedure (test, recording, analysis and feedback, etc.)

**Good practices:**



**B7** - Train the team in charge of the hazard study in the method used to ensure the health and safety of goods

**B8** - Train and sensitize your staff, as soon as they arrive and periodically thereafter, to the control measures you have defined - at least, if applicable, those of the STEF site you are on (**welcome booklet, good practices, procedures, instructions, directives, notices, etc.**) - and keep records of these measures.

**B9** - Ensure that frozen goods do not stay in a chilled area for more than 30 minutes before being placed in a suitable environment (see Chapter D) - This maximum length of stay can be adjusted by STEF in certain cases. STEF will then notify you in writing.

**B10** - Delimit your intervention area (cones, markers, signaling tape, temporary markings, etc.)

**B11** - Ask for the removal of goods that may be affected by your activities, if this is not possible, protect them from any risk of contamination or deterioration, including for work at height

**B12** - Identify the driver in the transport confirmation documents

### You must not

- Transport products without respecting the rules of compatibility defined by the regulations (*ADR, REACH/CLP, UN...*)
- Concomitantly transport waste and food products

## Chapter C - HYGIENE

**Rules** : You must comply with strict rules concerning the hygiene of your personnel, premises, vehicles, equipment and packagings that you use to carry out the operations we entrust to you, in order to avoid any risk to people's health (contamination, deterioration of goods). Whenever you work on a STEF site, you must also comply with the rules defined by the STEF site.

### Requirements - You must

**C1** - Train your staff in good hygiene practices, the use of cleaning products, hygiene rules and ensure that they apply them

**C2** - Provide as many work clothes and PPE as necessary and remind your staff of the necessity to change them regularly and each time they are soiled, especially when this can have an overall negative impact on the general hygiene and therefore on the food safety : work clothes must be clean.

**C3** - Define and follow a cleaning plan for the premises and/or vehicles (inside and outside the body) based on a formal study (see Chapter B)

**C4** - Define and implement a pest control plan (location and nature of traps and baits, control frequencies, recordings, etc.)

**C5** - Ensure the proper management of hazardous products and waste, including keeping their safety data sheets up to date, storing them in specific locations and containers to which access is controlled, complying with compatibility rules and regulatory labelling and display for their storage

**C6** - Ensure the proper management of non-compliant goods and non-hazardous waste (packagings, flows, traceability, recording of actions taken)

⇒ compliance with the requirements of the Environmental Code and *relevant European regulations (waste, animal by-products where applicable, etc.)*

**C7** - Train your staff in the proper use of the refrigeration units fitted in the vehicles and trailers (setpoint temperature settings, operation/ventilation mode, error message, fluid and fuel level filling/checks, recorder...)

**C8** - Verify that the packagings used or entering the premises or vehicles/trailers are not a source of contamination or deterioration of the goods (cleanliness, absence of treatment, odours, pests, substances or chips, nails...)

**C9** - Set up a "breakable materials" plan - or respect the plan of the STEF site you work for - locating all the "hard" and breakable materials - like plastic, glass, ... - and setting up a management procedure allowing in particular to record any breakage and the actions implemented to avoid any risk for the goods

**C10** - Ensure that the quality of the water used to rinse the cleaned areas/surfaces that may come into contact with the goods, in particular, meets the drinking water quality criteria

## Good practices

**C11** - Ensure that your staff has good overall hygiene (clean hands, protected wounds...) and always wears clean clothing adapted to their activities

## Chapter D - TEMPERATURE COMPLIANCE

**Rules** : The goods must transit, be stored or awaiting collection in environments and areas adapted to their nature, packaging and destination, in accordance with the instructions given. The temperature of the temperature-controlled areas must be monitored, recorded and archived.

For operations related to goods requiring a temperature above +4°C or not regulated, you must refer to their specific requirements (specifications, specific agreements with STEF, labelling, etc.) and not apply the instructions below. In the event of grouping this type of goods with others requiring a lower controlled temperature, it is necessary to apply the lowest required temperature to the entire groupage or compartment concerned.

### Requirements - You must

**D1** - Check the adequacy between goods and storage, transit and transport conditions (temperature, dedicated area, waiting area...)

**D2** - Observe the following temperatures in the areas where the goods may be located:

AREAS	Temperature of storage areas	Alarm triggered if +4°C < air temperature < +6°C	Alarm threshold temperature	Alarm triggering if the alarm threshold is exceeded	Temperature recording	Archiving time
<b>Chilled</b>	+2°C ≤ Temp ≤ +4°C	Alarm triggered after 60 consecutive minutes (max.)	+6°C (max.)	Immediate alarm = without delay	7 days a week and 24 hours a day	1 year (minimum)
<b>Frozen</b>	Temp ≤ -18°C	Not Applicable	-18°C (max.)	Alarm triggered after 30 consecutive minutes (max.)	7 days a week and 24 hours a day	5 years (minimum)

**D3** - Observe the following temperatures in vehicles and trailers containing goods:

VEHICLES TRAILERS	Setpoint temperature	Ambient air temperature	Ambient temperature recording	Deadline for providing records	Archiving time
<b>Chilled</b>	+2°C max. (while remaining > 0°C)	+2°C ≤ Temp ≤ +4°C	Mandatory in the presence of goods	48 hours (max.)	6 months (minimum)
<b>Frozen</b>	Temp ≤ -21°C (max.) Setpoint Temp = -25°C in France and Belgium	Temp ≤ -18°C	Mandatory in the presence of goods	48 hours (max.)	2 years (minimum)

For local distribution in Italy, temperature recording is only recommended if the temperatures of the goods are recorded at loading and unloading and if the trailer body has a display of the ambient temperature of the body.

**D4** - Comply with the maximum acceptability temperatures of the goods on receipt/collection:

**As soon as the temperature of the product is higher than the temperature fixed by the regulations or by the producer**- i.e. the temperature indicated on the product label (referred to below as "x°C") - **the necessary reserves must be noted on the transport or receipt documents and the instructions prescribed** specifically by STEF for this type of goods/case **must be followed** or STEF must be informed to determine what to do if no specific instructions are provided.

Please note that reservations should be made as soon as the product temperature is outside the temperature range marked on the label - even if the temperature is within the tolerances described below.

For frozen products ( $x^{\circ}\text{C} \leq -18^{\circ}$ ), a surface tolerance of the products may be allowed:

<b>GOODS</b>	Maximum permissible temp on receipt at surface between 2 packages of goods	Maximum permissible temp on receipt at the core of the goods
<b>Frozen</b>	Temp $\leq -15^{\circ}\text{C}$	Temp $\leq -18^{\circ}\text{C}$

For chilled products ( $+2^{\circ}\text{C}/+4^{\circ}\text{C}$ ), it can be tolerated during short transit phases of  $+/-2^{\circ}\text{C}$ .

**D5** - Have and comply with a metrology procedure to ensure that your temperature measurement and recording equipment is accurate and reliable, in accordance with the regulations in force - (see Chapter A)

**D6** - Pre-cool the body of the vehicle before any loading and takeover of goods:

- Temperature of the body for frozen products  $\leq -10^{\circ}\text{C}$
- Temperature of the body for fresh products between  $+0^{\circ}\text{C}$  and  $+6^{\circ}\text{C}$

### Good practices

**D7** - Recommendation for the operating mode of the on-board refrigeration unit:

⇒ **For the trailers:**

GOODS	RECOMMENDED OPERATING MODE
Deep-frozen/frozen packaged foodstuffs	Discontinuous (Start Stop or Sentry mode)
Chilled packaged foodstuffs	Discontinuous (Start Stop or Sentry mode)
Unpackaged and freshly hung meat	Discontinuous (Start Stop or Sentry mode)
Flowers, plants ...	Discontinuous or Continuous depending on customer requirements and the sensitivity of the plants to low temperatures

⇒ **for straight trucks, continuous operation must be the rule.**

**D8** - When opening a door of a vehicle containing temperature-controlled goods

- IF THE TEMPERATURE OF THE BODY IS DIFFERENT FROM THE AMBIENT TEMPERATURE THEN THE REFRIGERATION UNIT of the vehicle or trailer MUST BE STOPPED and you must ensure to minimize the time the doors are open,
- OTHERWISE LEAVE THE REFRIGERATION UNIT IN OPERATION

## Chapter E - TRACEABILITY, REACTIVITY AND TRANSPARENCY

**Rules** : You must have a system that ensures a reliable, secure and durable traceability of the activities carried out on our behalf. Furthermore, we ask you for complete transparency and reactivity in the provision of information/data in relation to each service entrusted to you.

### Requirements - You must

**E1** - Have a system to ensure the traceability of information (e.g. quantity, records, etc.), flows, data for each service provided on our behalf

**E2** - Provide us with ambient temperature recordings in temperature-controlled vehicles and trailers within 48 hours maximum



**E3** - Provide us with the recordings of the ambient temperatures of temperature-controlled premises within 24 hours maximum

**E4** - Report any unavailability, even temporary, of your information systems in a fluid and transparent manner before we solicit you on the subject

**Good practice**

**E5** - Perform a traceability test in real conditions every year

**You must not**

- Hiding information from STEF or hiding the unavailability of certain data related to our requirements

## Chapter F – PREVENTION OF MALICIOUS ACTS / FOOD DEFENSE & FOOD FRAUD

**Rules :** You must put in place sufficient preventive and protective measures to prevent and fight against intentional and malicious acts of contamination, damage or fraudulent tampering.

### Requirements - You must

- F1** - Write and respect an alert procedure in case of malicious act detection including training, exercises and feedback
- F2** - Control access to storage areas during and outside operating hours
- F3** - Establish a list of persons authorized to access sensitive or even dangerous areas and put in place specific signage
- F4** - Identify all external operators and visitors by providing them with, for example, specific badges and/or clothing
- F5** - For external operators, including visitors, apply the following rule: "Announced, welcomed and accompanied" and clearly define the areas that are accessible to them or not
- F6** - Carry out all cargo loading under the supervision of people trained in our requirements and best practices
- F7** - Protect yourself from malicious actions and avoid facilitating them by setting up a process of integration and departure of personnel including the retrieval and its recording of keys, badges, specific clothing, etc.
- F8** - Equip vehicles and trailers with systems that prevent access to the goods without any detectable break-in

### Good practices

- F9** - Report to the Management and record incidents, accidents and risky or dangerous behaviour that may endanger the goods or the health of persons
- F10** - Sensitize new employees to our Food Defense & Food Fraud standards and then periodically inform the staff of our requirements
- F11** - Mark the authorized parking areas for the different types of vehicles and users
- F12** - Provide a mobile phone to each driver working for STEF
- F13** - Define and implement the procedures for managing vehicle keys on site
- F14** - Train and sensitize your drivers to the tricks of road pirates (following car, hijacking, car/truck-jacking...)
- F15** - Forbid the drivers to take hitchhikers
- F16** - Physically prevent (by locking etc.) free access to dangerous maintenance, sanitation and cleaning products, for example

### You must not

- Substitute packagings, labels or goods
- Add products or substances to the goods
- Re-label goods - especially sales units - without explicit and written validation by STEF and within the framework of an established procedure