Document Number:	# Product Quality Booklet
PO WE X11369	
Issue Number:	
4	
Author:	D. Faiman (Corporate Quality Manager)
Approver:	L. Beck (Director Quality Europe)
Issue date:	10/9/2019

This booklet is compiled as a communication document for our factories and 3rd party suppliers and it includes Wessanen Europe quality and food safety requirements for Wessanen branded products.

TABLE OF CONTENTS

1 INTRODUCTION

This booklet includes Wessanen general quality requirements applicable to Wessanen brands finished product. These requirements must be complied with by all Wessanen factories and 3rd party suppliers.

Separately specific requirements per product category will be indicated in Preventive Action per Category (PAC) documents.

Satisfactory compliance with the different components of this booklet (and PAC) will be controlled by the Wessanen Market Quality Department.

Approval to supply Wessanen brands finished products will be based on Wessanen required Supplier Quality Declaration (SQD) and monitoring evaluations performed by the Wessanen Market Quality Department.

In this booklet, Wessanen brands finished products will be referred to as finished products. A manufacturer of such products (own Wessanen factory, co-packer or third party supplier) will be referred to as supplier.

Many of the expectations in this booklet are based not only on regulatory requirements, but also industry best practices and expectations from our consumers and customers.

This booklet does not eliminate a supplier's responsibility to comply with all applicable European or local legal requirements, Wessanen Purchasing terms and/or other contract obligations. Wessanen reserves the right to make modifications to this booklet as required. Suppliers will be notified of these changes. In case of conflict between the Supplier Quality Booklet and the General Purchase Terms and Conditions of Wessanen and its affiliated companies or the supply agreement with the supplier, the Supplier Quality Booklet will prevail.

Wessanen will be monitoring the supplier status against the requirements in this booklet, and any deviation may constitute a breach of the terms of conditions of trading, as stated in Wessanen General Purchase Conditions.

For questions on the documents, please contact your Wessanen Quality contact.

2 WESSANEN QUALITY POLICY

It is the policy of Wessanen and its operating companies:

- To produce and market food with superior product quality as expected by our consumers and customers.
- To achieve this target with the cooperation and compliance of our suppliers to the Wessanen Quality Requirements as defined in this booklet.

All finished products supplied to Wessanen must comply with latest amendment of all European legislation and with any relevant codes of practice applicable to the product or process.

Any changes to, or proposals of change which impact the regulatory compliance of Wessanen brands products in the market must be communicated immediately to the appropriate Wessanen representative.

3 WESSANEN SUPPLIER QUALITY MANAGEMENT SYSTEM

3.1 SUPPLIER SELECTION AND APPROVAL

- Each prospective supplier facility must undergo an evaluation prior to approval. The purpose of this evaluation is to assess the prospective facility's quality systems against the requirements detailed in this booklet.
- Wessanen Market Quality contact or representative must be given access to all supplier facilities.
- Wessanen will be also given copies of relevant documentation and records, as requested, with a minimum of the following documents which are mandatory:
  - HACCP documentation, including:
    - HACCP plan
    - CCP overview
  - Allergen management assessment
  - Process flowchart
  - Copies of relevant certificates
    - GFSI certificate and last audit report
    - Any other relevant certificate, such as organic, etc.

  Supplier must inform Wessanen of any changes in the documents above, and specifically in case a certification is withdrawn or audit date postponed to outside the original certificate validity dates.

- **Step 1**
  - All prospective supplier facilities must complete the following documents and return them to the relevant Wessanen representative:
    - Suppliers that maintain a GFSI recognized certified quality management system:
      - Will be required to fulfil Supplier Quality Declaration Part 1, which includes commitment to the Wessanen specific policies, and the Preventive Actions per Category (PAC).
      - Are asked to send the latest relevant certificates and audit reports
    - Suppliers that do not maintain a GFSI recognized certified quality management system will be required to fulfil all three documents: the Supplier Quality Declaration Part 1, Supplier Quality Declaration Part 2 and Preventive Actions per Category (PAC)

- **Step 2**
  - Upon receipt of the completed declaration and accompanying documents, the content will be reviewed by the Wessanen Quality team, and if needed, more information will be requested from the supplier.
  - The Market Quality team will make a risk assessment considering the specific Wessanen policies relevant to the supplier and the products to be produced.
  - The evaluation of the completed supplier declaration and the risk assessment results will be used to determine the final approval status of the supplier's facility and if a site visit is necessary.
  - After a site visit, a report with the result of the visit and any non-conformances identified against Wessanen requirements will be issued to the supplier.

- **Step 3**
  - The supplier will be assigned a status:
    - *Approved*
    - *Approved under restriction*: non-conformances identified during the supplier visit must be resolved for the supplier to gain approval status The supplier will need to confirm in

writing the corrective action plan (including details for each non-conformance and timelines). After the corrective action plan and confirmation of its results have been verified, the supplier approval can be given.

- *Rejected*: Supplier deemed not suitable for producing Wessanen branded products.

- The relevant Wessanen representative will inform the supplier and explain the reason for this decision.

3.2 SUPPLIER QUALITY MONITORING

- Supplier quality monitoring is done by the Wessanen quality team and will be based on periodic evaluation of the following parameters:
  - Number of complaints per million units produced / purchased
  - Number of quarantines, withdrawals, and/or recalls
  - Product monitoring plan compliance results
- Supplier Quality Monitoring reports will be sent and discussed with the supplier regularly to define and execute together a Supplier Quality Plan for continuous improvement.

4 WESSANEN QUALITY REQUIREMENTS – PART 1

All Wessanen's third party finished products suppliers must comply with the following points:

4.1 CORPORATE SOCIAL RESPONSIBILITY

At Wessanen we want to be a 'Force for Good' and we are working towards being B-Corp certified across all our operating companies; as part of this journey we are also looking at our social and ethical impact as this really matters to us. Ethical is increasingly important to us because of the changing regulatory environment as well as the increasing global awareness of forced labour, especially in the countries we source from.

We have spent time reviewing how we work with our suppliers on ethical trade and we have published a revised Supplier Code of Conduct (ver.2019). In addition, Wessanen has chosen to use SEDEX as its platform to address ethical compliance with tier one suppliers.

In accordance to this, Wessanen suppliers must be committed to:

- Signing and applying the Wessanen's Supplier Code of Conduct (the document can we found on our website, follow this link: https://wessanen.com/wp-content/uploads/2019/04/Suppliers-Code-of-Conduct_2019.pdf
- Applying the Wessanen Supplier Ethical Policy (see 7.1)
- It is recommended to become B-corporation certified (see https://www.bcorporation.net/)

4.2 ORGANIZATION

Suppliers must have procedures in place that define the organizational structure, procedures and training programs that will be executed to ensure that the products manufactured under Wessanen brands will be safe and meet the quality expectations of Wessanen.

4.3 QUALITY MANAGEMENT SYSTEM

It is required for suppliers to maintain a verifiable quality management system which is evaluated regularly to ensure its effectiveness. A GFSI[1] recognized certified quality management system is recommended, and allows the supplier to make use of the speedy approval procedure (see 3.1)

4.4 FOOD DEFENCE

It is essential to Wessanen to protect its consumers, employees, brands and other assets from product contamination, by organising and promoting efforts to prevent, deter, identify, respond to and contain threats or acts of deliberate contamination.

- Each supplier location shall assess the hazards posed to finished products produced in its facilities by potential acts of sabotage, vandalism or terrorism and shall put in place proportional protective measures.
- Food Defence plans must be documented, reviewed and revised as required by regulation and/or minimally once a year.

[1] Global Food Safety Initiative – for more information, go to www.mygfsi.com

4.5 RISK MANAGEMENT

General risk management will be applied to the evaluation of raw material, packaging material, processing and product composition for all food safety, quality and possible fraud risks.

4.5.1 FOOD FRAUD

Food fraud is of growing concern. It involves the deception of consumers using food products for economic gain. Food fraud can be more dangerous than traditional food safety risks because the contaminants are unconventional and not obvious to the consumer.

At Wessanen we have integrated this hazard into our global risk analysis. We believe that it is a joint responsibility with our supplier to have a system in place to ensure that the food integrity is secured (see 7.2)

4.6 ISSUE AND CRISIS MANAGEMENT

An issue is defined as any act or event that has the potential to have a negative effect on the Wessanen brands, typically associated with the production or supply of unsafe, illegal or non-conforming product.

4.6.1 COMMUNICATION

The supplier must provide Wessanen with an emergency contact, including individual name, telephone numbers and email address.

There are 2 routes of issue identification:

- Internal (Wessanen): employees; monitoring plan results
- External: authorities; consumer or customer; media; suppliers

If any defect in the goods (including packaging) becomes known to one of the parties, the party is obliged to inform the other party immediately of such defect, stating:

- Route issue identification (see above);
- Type of defect;
- The goods affected (name, brand, article code, lots concerned);
- Any other information known that may be relevant.

Records of production of the relevant batches (traceability data) must be sent to Wessanen within 4 hours after request.

The supplier should not communicate externally on behalf of Wessanen.

4.6.2 ISSUE HANDLING

- A team must be in place at the supplier to manage major situations involving food safety, major regulatory issues, natural disasters or significant public relations problems.
- When Wessanen informs the supplier of an issue, the supplier must conduct a full investigation to analyze the root cause. Wessanen will request updates as needed.
- A final investigation report must be sent to Wessanen within the agreed timeline.
- If a recall[2], a withdrawal[3] or a quarantine[4] is decided, conditions defined in the Wessanen General Purchase Conditions or in the contract between Wessanen and the supplier apply.

[2] Recall is when finished products are removed from the market via a public announcement
[3] Withdrawal is when finished products are removed from the shops and distribution center / supply without a public announcement
[4] Quarantine is when finished products are put on hold in warehouse

- All suppliers must regularly review the adequacy of their product recall procedures.
- In case of issues, product analytical tests must be performed in accredited laboratories that have a proven track record in the analysis in scope and in the material product matrix, including the participation in ring trials.

4.6.3 COMPLAINT HANDLING

The supplier will have in place a procedure to investigate, manage and correct, analyze trends and respond to consumer complaints.

Consumer complaints reports will be sent to the supplier so that improvement plans can be put in place as necessary. The supplier should reply within the agreed timelines.

4.7 ALLERGEN MANAGEMENT

Allergen management for all Wessanen brand products must comply with the Wessanen Allergen Management Policy (see 7.3).

4.8 GENETICALLY MODIFIED ORGANISMS (GMOS)

Wessanen brand products do not contain any GMOs, GMO ingredients or ingredients derived from GMOs.

All suppliers which produce products containing ingredients such as soybean, corn and/or rapeseed must apply the Wessanen Non-GM Ingredient Policy (see 7.4) and all packaging materials must comply with the Wessanen Non-GM Packaging Policy (see 7.5).

4.9 PESTICIDE RESIDUES

Wessanen consumers have high expectations when it comes to pesticide residues in our branded products, in particular in organic products.

All Wessanen organic branded products must comply with Wessanen Pesticide Policy (see 7.5).

4.10 PALM OIL

As an integral part of our sustainability policy, Wessanen adheres to the production of certified sustainable palm oil as managed by the Roundtable for Sustainable Palm Oil (RSPO).

Suppliers are required to adhere to the Wessanen Certified Sustainable Palm Oil Policy (see 7.7).

4.11 MINERAL OILS

Mineral oils (MOAH, MOSH) cover a diverse group of hydrocarbons with a safety risk, in particular in case of regular exposure. They are currently not regulated under European law. However, the following thresholds in the product have been proposed by the BMELV (German Federal Ministry of Food, Agriculture and Consumer protection):

- MOAH (Mineral Oils Aromatic Hydrocarbons) C16-C35: no detectable (with a detection limit less than 0,5 mg / kg).

At Wessanen, we apply this threshold for MOAHs and we strive for absence of MOSH (Mineral Oils Saturated Hydrocarbons) in our products.

We require our suppliers:

- to evaluate and manage the risk of mineral oils contamination from all possible sources:

  - raw materials and ingredients
  - processing aids
  - machinery lubricants & oils
  - packaging materials including inks, sealants, glues, etc.
- to warrantee the above mentioned thresholds in Wessanen branded finished products

5 WESSANEN QUALITY REQUIREMENTS – PART 2

Additionally to the points in 4. Wessanen Quality Requirements – Part 1, all suppliers which do not have a GFSI certified quality management system, should also comply with the following points:

5.1 HAZARD ANALYSIS AND CRITICAL CONTROL POINTS (HACCP)

Suppliers must have a documented food safety program in place: HACCP, including hazards identified (in particular allergens, pesticides and GMO, see appendices for Wessanen policies) and a process-flow diagram.

HACCP program must comply with Codex Alimentarius (latest approved version), and ideally validated by an external party.

HACCP must be reviewed and revised, when any changes are made to the products or processes, when repetitive issues occur, if required by regulation and/or minimally once a year.

HACCP documentation and process-flow diagrams must be made available to Wessanen upon request.

5.2 PROCUREMENT CONTROLS

Suppliers must have controls in place to ensure that raw materials, other intermediate products and food-contact packaging materials comply with their specifications.

Suppliers must provide Wessanen with the following information on the raw materials, packaging and other intermediate products used in the finished products:

- Name of ingredient
- All possible countries of origin of the agricultural ingredient

Supply chain information must be made available upon request:

- Supplier name and supplier location

5.3 MANUFACTURING CONTROLS

5.3.1 FACILITY AND EQUIPMENT CONTROLS

Suppliers must produce finished product in facilities with equipment that is properly designed, built and maintained to ensure the production of safe food products. ○ The facilities must be operated in a sanitary manner, according to procedures.

Procedures must be in place to prevent and identify potential extraneous material contamination of products, such as:

- Verification of water source for portability.
- Glass, wood (including pallets) and brittle plastic management policy.

5.3.2 FOREIGN MATERIAL CONTROLS

A program to control foreign material must be in place. Based on the process and the manufacturing environment, it could include devices such as magnets, sieves, screens, bone detection devices, metal detectors, optical sorters and x-rays.

5.3.3 IN PROCESS CONTROLS

Effective in process controls must be in place to ensure the product is produced according to specifications and/or regulatory requirements.

In particular, process controls must be in place to ensure the allocation of the correct ingredients, processes and packaging (and labelling) to the appropriate production batch.

In process controls must be done at a pre-established frequency (based on risk assessment) to ensure product safety, results must be documented, held for one year past the product shelf life or as required by applicable regulations, and must be made available to Wessanen upon request.

5.3.4 PRODUCT HOLD AND RELEASE

Effective controls must be in place to manage product that does not conform to specifications and/or regulatory requirements, including:

- Record keeping procedures to log and track all batches put on HOLD to ensure correct disposition.
- Secure location to store product retained for non-compliance issues.

Without prejudice to Wessanen's right to claim damages, nonconforming Wessanen brand products may be:

- reworked following strict rework and traceability control procedures,
- donated subject to Wessanen's prior written consent,
- disposed of, in which case the supplier will denature the product and its packaging prior to disposal.

5.3.5 LABORATORY CONTROLS

For product testing, laboratories with publicly recognized accreditation for the particular testing scope must be used. This is not mandatory for routine quality control tests.

When an internal laboratory is used, the following systems and practices must be in place:

- Written sampling plans must be in place for all materials to be tested.
- All laboratory methods must be based on accredited methods.

The laboratory must have quality control procedures in place to ensure the accuracy of results, and tests must be performed by properly trained staff.

Pathogen testing can be performed only if the appropriate laboratory controls and laboratory design/location is in place to protect the production facility.

5.3.6 PEST PREVENTION

Suppliers must have an effective integrated pest management program in place to ensure that the facility and its surroundings are maintained in a sanitary and pest free condition.

5.4 WAREHOUSE AND TRANSPORTATION CONTROLS

Suppliers must have procedures in place to ensure that products are stored and distributed in a timely, safe and secure manner, and can be effectively traced if necessary.

5.4.1 RECEIVING AND DISPATCHING

Procedures to ensure control of incoming and dispatch of raw materials, packaging materials, intermediates and/or finished products must be in place, including inspection of trailers, taking of product temperatures (if relevant) , and inspection of loads. Receiving and dispatching activities must be documented.

5.4.2 RETURNED GOOD CONTROLS

A documented program must be in place describing the management of any finished product returned to the facility after it has left the control of the supplier's company, including methods of segregation and evaluation of the product.

5.5 TRACEABILITY

Suppliers must have procedures in place that will permit traceability of all product ingredients, product contact packaging, and finished products by individual lot number or other identifying code, one step back and one step forward in the supply chain.

Records of production must be maintained for one year past the shelf-life of the product or as required by applicable regulations.

5.6 FINISHED PRODUCT CONTROLS (PHYSICAL, CHEMICAL, AND MICROBIOLOGICAL PROPERTIES)

Physical, chemical and microbiological product testing against legal determined limits and/or specific Wessanen requirements specified in the Preventive Action per Category documents (PACs) must be performed at the defined frequency.

All testing results must be documented and be made available to Wessanen upon request.

Retained finished products samples, at least TWO consumer unit per batch code, must be held for the duration of the batch shelf life, and be made available to Wessanen upon request.

6 FINISHED PRODUCTS

Wessanen requires that suppliers provide a technical specification, otherwise known as a finished product specification for every finished product.

Specific product category food safety and quality requirements are described in the Supplier Preventive Action document (see 3.1)

6.1 FINISHED PRODUCT SPECIFICATION

The finished product specification, managed by Wessanen R&D teams and signed by the supplier, in the Wessanen requested format, includes ***at minimum***:

Recipe information:

- full list of ingredients and sub-ingredients (including processing aids) with percentages in final product, countries of origin, quality marks (e.g. organic, MSC, etc.)
- allergen declaration
- nutritional values per 100 ml/gr (see 6.1.1 Nutritional value declaration)
- health and nutritional claims agreed during development
- consumption serving size
- country of manufacturing
- country of packaging
- whether the product is produced in a supplier facility or outsourced to a third party
- shelf life details and shelf life validation test information o storage (before and after opening) and transport conditions
- preparation instructions
- organoleptic characteristics, dimensions
- supplier mandatory statements and logo details (e.g. Organic EU logo)

Packaging information:

- description and type of packaging, food grade declaration
- materials used (including inks), weights, environmental marks, and disposal information
- shelf life and traceability codes descriptions and examples
- net weight (e-mark), number of servings per consumer unit
- packaging treatment details (e.g. modified atmosphere)
- compliance with all EU regulation
- compliance to different Wessanen requirements with regards to packaging composition

6.1.1 NUTRITIONAL VALUE DECLARATION

WSN requires the supplier to deliver nutritional data allowing a correct declaration on packaging and supporting agreed nutritional and health claims.

The supplier will be held responsible in case of incorrect nutritional data in the specification. He will be asked to provide Wessanen with corrected data from analysis. Costs linked to incorrect data (fees from authorities, packaging destruction, analysis by Wessanen) will be charged to the supplier.

6.2 NEW PRODUCT APPROVAL

New product approval by Wessanen R&D teams could include:

- Approval of prototypes, preferably industrial trials
- First production run sample(s)
- Analytical tests (when relevant)

7 APPENDICES

7.1 SUPPLIER ETHICAL POLICY

7.1.1 SCOPE

The Supplier Ethical Operating Policy will be applied to all tier one third-party supplying sites and own factories for Wessanen branded products. Wessanen may apply the policy further down the supply chain for key raw materials.

7.1.2 PROCESS DESCRIPTION, RESPONSIBILITIES, DOCUMENTATION AND TOOLS

The supplier ethical trade performance will be monitored based on periodic evaluation of the SEDEX Advance (the supplier ethical data exchange).

Suppliers manufacturing Wessanen branded products are expected to be registered on SEDEX Advance and to have completed the Self-Assessment Questionnaire (SAQ). Where supplier sites have hosted an ethical audit, the non-conformances shall be closed out within the required timeframe.

Supplier and supplier sites manufacturing Wessanen branded product shall allow access to the SAQ and audit non-conformances.

Note: All suppliers based in UK must comply with the requirements of the UK's Modern Slavery Act and in particular the Transparency in Supply Chains provision (Article 54/9).

7.1.3 SUPPLIER REQUIREMENTS

The section below outlines Wessanen's requirements specific to SEDEX and what is expected from suppliers**:**

a) **Suppliers shall be registered on** SEDEX Advance
   - Suppliers are required to join SEDEX, at least with B-membership.
   - Membership must be renewed annually

b) **Suppliers shall complete the SEDEX** Self-Assessment Questionnaire (SAQ) for production sites manufacturing Wessanen branded products.
   - The SAQ must be 100% complete.
   - Suppliers must ensure the SAQ is linked and visible to Wessanen [Company Reference ZC406895974] on SEDEX system.
   - SAQs must reviewed and updated at least annually.

c) **Ethical Audits** shall be required only where a supplier is classed as high risk by the SEDEX risk assessment following the completion of the Self-Assessment Questionnaire. Note that Wessanen is aligned with the Sedex's grading system for Ethical Audits non-conformances. Business critical non-conformances found during ethical audits must be communicated to Wessanen by the supplier within 5 working days of the non-conformance being identified by the auditor.

7.1.4 RESPONSIBILITIES

This Supplier Ethical Policy applies to all Wessanen first tier suppliers.
Wessanen expects its suppliers' senior managers to take responsibility for ensuring that the Supplier Ethical Policy is implemented and resourced sufficiently to be effective.
Supplier ethical trade monitoring reports will be prepared every 12 months by Wessanen's CSR team and shared by Wessanen Central Sourcing staff with suppliers under their responsibility.

KPI	Definition	Scope
% supplier Ethical Trade compliance	Suppliers complying with Supplier Ethical Operating procedure: - Registration on SEDEX - Completion of SEDEX SAQ - Follow up of ethical audit non-conformances	Own Brands

Wessanen will undertake a risk assessment to identify which of the company's raw materials represents the highest ethical trade risk. Once identified, these risks will inform future requirements of Wessanen suppliers for additional due diligence below tier one.

7.2 FOOD FRAUD POLICY

7.2.1 INTRODUCTION

Food fraud is of growing concern. It involves the deception of consumers using food products for economic gain. Food fraud can be more dangerous than traditional food safety risks because the contaminants are unconventional and not obvious to the consumer.

At Wessanen we have integrated this hazard into our global risk analysis. We believe that it is a joint responsibility with our supplier to have a system in place to ensure that the food integrity is secured.

We have confidence in our suppliers and that is why we are very transparent about our intentions and our practices on this topic. We are convinced that together we will have more strength to prevent and limit this hazard and we need your cooperation, as you need the cooperation from your suppliers.

Two fundamental steps should be taken to aid in the mitigation of food fraud:

- Firstly, to carry out a 'food fraud vulnerability assessment' in which information is collected at the appropriate points along the supply chain (including raw materials, ingredients, products, packaging) and evaluated to identify and prioritize significant vulnerabilities for food fraud.
- Secondly, appropriate control measures shall be put in place to reduce the risks from these vulnerabilities. These control measures can include a monitoring strategy, a testing strategy, origin verification, specification management, supplier audits etc...

7.2.2 SCOPE

This policy applies to Wessanen EU own Branded products, organic and conventional.

7.2.3 POLICY

With this policy we strive to:

A. determine the most relevant and appropriate preventive actions at our level
   - Follow and update our food fraud risk assessment
   - Inform and include our suppliers in this process
   - Implement a specific, appropriate and accurate control plan (analysis, visit…)
   - Cease trading with any supplier which is directly involved with food fraud.

B. ask our supplier to put in place at their level and with their suppliers:
   - A food fraud vulnerability assessment
   - Appropriate control measures
   - A clearly documented control plan outlining when, where and how to mitigate fraudulent activities.

We believe that it's a joint responsibility between Wessanen and the supplier to have a system in place to ensure that the food integrity is secured, in order to maintain the trust of our consumers in our products, in our company.

7.3 ALLERGEN MANAGEMENT POLICY

7.3.1 INTRODUCTION

Allergens in foods are a food safety risk and, as such, must be managed to ensure the safe consumption by the allergenic consumer. Consumers affected by allergen or intolerance reactions should be given the possibility to choose food products that are safe for them, by having access to complete and accurate information.

7.3.2 Scope

- **Products:** this policy applies to Wessanen EU own branded products both organic and conventional.
- **Allergens:** this policy refers to all allergens listed in Annex II of European Regulation No. 1169/2011 or in local specific regulation where the product is sold, whether they are intentionally present in Wessanen products as ingredients or they are present as a result of cross-contamination.

7.3.3 Definitions

- An allergen is usually a protein capable of inducing an allergic reaction.
- Allergen cross contamination is the unintentional presence of trace amounts of allergenic foods in the final product.
- 'May Contain' labelling is used to inform consumers of the risk that food might accidently contain small amounts of an allergen.
- Unintentional presence is the accidental inclusion or contamination by another allergen ingredient not already present in the finished product.
- An allergic reaction involves an immune system response that affects different organs in the body and can be life threatening.
- An intolerance does not involve an immune system reaction and the symptoms are linked to difficulty in digesting and assimilating foodstuff.

7.3.4 Wessanen Expectations - Allergens

- Wessanen product formulation should avoid the use of allergenic ingredients whenever possible (taking into consideration costs, technological and other constraints).
- Suppliers must deliver safe products for our consumers, including people who suffer from allergies and/or intolerances.
- The supplier must maintain an risk based allergen management program. This shall be constructed using HACCP principles to ensure that allergen cross contamination is minimized and appropriately controlled.
- Positively releasing materials potentially containing allergens must not be used, unless it is used to substantiate the adequacy of other validation/verification activities.
- It is expected that the supplier will have a documented system in place to demonstrate which raw materials, ingredients or finished product contain allergenic ingredients.
- Where an allergen is not incorporated into **all** products, suitable control measures must be in place for its management.
- All allergens require specific handling. The Supplier must be able to demonstrate that specific risk assessment studies have been performed on all allergen containing ingredients. These assessments must include, but no limited to:-
  - Identify potential allergen cross-contamination from raw material suppliers.
  - Identify the raw materials containing allergens used on site and which products are at risk.
  - Define the process steps.
  - Assess the risk of allergen cross-contamination.
  - Implement allergen controls.
- A formal policy for handling allergens must be held and shared with Wessanen.
- Procedures and practices designed to prevent allergen cross-contamination include:
  - Controlled storage / sampling / dispensing activities of incoming raw materials.
  - Production activities / rework controls /equipment design/ scheduling/ packaging controls.
  - Efficacy of cleaning must be confirmed by product testing and plant swabbing, re-verified annually.
  - Supplier must implement an effective employee allergen training program.
  - New Product Development controls.

Please note that a request to put cross-contamination information on a finished product label shall not be used as a substitute for an effective food allergen control program.

- All allergen information must be indicated in the product specification in line with EU Regulation's No. 1169/2011.
- Sites must be able to formally declare their allergen status in the Wessanen specification based on the allergen risk assessment outcome for cross-contamination.

Please note that the supplier must inform Wessanen proactively and timely of any change occurring at the production site and/to the product specification, to allow changes to the product labelling if needed.

- Wessanen will carry out its monitoring plan and will share the results with the supplier if necessary.

7.3.5 ALLERGEN LABELLING

Labelling of allergens should help allergic consumers identify quickly and easily foods of concern and must conform to the European and local regulations.

Suppliers must comply with the following:

- When cross-contamination is unavoidable, the supplier must declare this in the product specification.

In case of an "allergen-free X" claim:

- The claim must be mentioned in the specification completed by the supplier; the supplier is responsible for any claims made.
- It is the responsibility of the supplier to take all measures deemed necessary to guarantee the conditions required for the claim, and to state them in the specification.
- For "gluten-free" claims for the products with the crossed grain logo:
  - Supplier must meet requirements of AOECS standard or are able to provide detailed assessment to prove the gluten free status in accordance with Regulation (EU) No 828/2014.
  - Supplier must send annually:
    - AOECS inspection certificate by an approved external control body
    - A gluten analysis certificate from an accredited laboratory (ELISA R5 Mendez method) relevant for Wessanen products

Please note that failing to declare an allergen cross-contamination in the product specification by Supplier, will result in immediate withdrawal of the product from the distribution. All costs related to this action will be borne by the supplier.

Whilst to date, there is European legislation that establishes thresholds for the use of "may contain" labelling required due to cross-contamination, there are best practice guides available such as Vital 2 (http://allergenbureau.net/vital/) which provide guidance as to when a 'May contain' declaration is required.

NOTE: where the cross contact allergenic material is contained in a particulate form rather than homogeneously distributed in the Finished Product no level of cross-contamination will be accepted without alibi labelling.

7.3.6 REFERENCES

i. Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32011R1169:EN:NO T

ii. Allergene in Lebensmitteln, Allergologie-Ernährungswissenschaft- Recht- Praxis, Behr`s Verlag

iii. Reputable Governmental or sector guidance to conduct Allergen Risk assessments include:
- Campden Guide 59: Validation of Cleaning to remove food allergens
- Campden Guide 71: Food allergens; practical risk analysis, testing and action levels

- FSA Guidance for food businesses on allergens: https://www.food.gov.uk/business-guidance/allergen-guidance-for-food-businesses#allergen-information-resources
- Risk assessment: http://www.foodallergens.info//Manufac/Assess.html
- Allergen HACCP list: http://www.foodallergens.info//Manufac/management/checklist.pdf
- VITAL (Voluntary Incidental Trace Allergen Labelling): http://www.allergenbureau.net/vital/vital/

7.4 NON-GM INGREDIENT POLICY

7.4.1 INTRODUCTION

Genetically Modified Organisms (GMO) are vegetable ingredients produced from seeds of which DNA has been modified to express a specific function (production of a toxin, resistance to a chemical molecule, production of a nutrient…).

According to regulation EU 1829/2003, the presence of GMO derived ingredients in a product must be labelled on pack, unless the proportion is below 0.9%. Organic regulation prohibits the use of GMO derived ingredients. According to a survey in 2010, roughly 70% of the European consumers do not want food containing GMO derived ingredients (1) and they see it as a threat for the environment (2). French authorities have defined labelling rules for claim “GM free” (text Nr. 2012-128 of 30/01/12), establishing a maximum threshold of 0.1% of GMO contamination, and conditions for the use of claim. There is no European alignment on this claim.

7.4.2 SCOPE

This policy applies to Wessanen EU own branded products, organic and conventional.

7.4.3 POLICY

- Our products do not contain any GMOs, GMO ingredients or ingredients derived from GMOs.
- Genetically modified ingredients “at risk” are: soybean, corn and rapeseed.
- Separately also the presence of GMO ingredients from microbes (and their growth medium) and microbial products such as enzymes, (strains of) yeast, ferments, etc. must be taken into consideration.
- Suppliers are expected to maintain a risk based approach to GMO contamination risk and share the results with Wessanen upon request.
- For “at risk” ingredients, which do not contain proteins and where GM contamination cannot be detected (no PCR possible), provide upon request a certificate of non-use of GM ingredient.
- For “at risk” ingredients containing proteins, have a PCR analysis, made by an accredited laboratory on each batch and provide this PCR analysis upon request:
    - do not use the ingredient batch if contamination is:
        - > 0.1% for all organic raw materials;
        - > 0.1% for conventional ones if there is a GMO free claim on the final product;
        - > 0.9% for other conventional raw materials;
        - unless a stricter limit is defined in the specifications;
- propose alternatives to “at risk” ingredients.

Wessanen will perform a monitoring plan based on a risk analysis. The following cases are considered:

- Organic or conventional product
- Presence of a “GMO free” claim
- GMO ingredients allowed or not allowed in Europe
- The levels below apply unless stricter rules are specified in the product or raw material specification.

Actions in case of presence of GMO contamination of a product:

Level of Contamination	Final product	Isolated case	Recurrent case (more than once on the same finished product or raw material)
LOD< x ≤ 0.1%	Organic		the supplier is asked to provide his analysis results on raw materials used.
0.1% < x < 0.9%	Organic without "GM free" claim	the supplier is asked to provide his analysis results of the raw material; the supplier must analyse the product before the next delivery and send the result to Wessanen.	the supplier must implement preventive actions agreed with Wessanen; the supplier must analyse each batch of the product before delivery and send the result to Wessanen until the problem is solved (at least 5 batches analysed).
0.1% < x < 0.9%	Organic and conventional with a "GM free" claim	block the product; the supplier must investigate; provide to Wessanen the analysis results on the raw material; make new analysis of finished product of the same batch and provide the results to Wessanen; Wessanen will release or reject the product based on the decision table below; the supplier will make analysis before sending the next delivery of finished product and provide the result to Wessanen.	
x ≥ 0.9%	Organic or conventional product		
detected	GMO not allowed in Europe		

Decision table if new analysis required:

Second analysis	Third analysis (in an accredited lab)	Course of Action
Conform (Below contamination level)	Conform	The product is accepted.
	Not conform	The product is rejected
Not Conform	Not applicable	

All costs related to the actions above shall be borne by the supplier.

7.4.4 LITERATURE

i. Eurobarometer Survey Nr 55.2 (EU commission)- September 2010 http://ec.europa.eu/public_opinion/archives/ebs/ebs_154_en.pdf
ii. Eurobarometer Survey 365 "Attitudes of European citizens towards the environment" http://ec.europa.eu/public_opinion/archives/ebs/ebs_365_en.pdf

7.5 NON-GMO PACKAGING POLICY

7.5.1 INTRODUCTION

Genetically modified organisms can derived from diverse ingredients and can not only be present in foods but also in packaging materials. Possible source of GMO crops in packaging are paper made with cotton, ink made with soy, and compostable films such as PLA made from corn.

7.5.2 SCOPE

All brands of Wessanen.

7.5.3 POLICY

Wessanen own brand finished products do not use GMO-derived packaging materials.

Wessanen's suppliers are required to declare in the packaging specification that there is no use of GMO-derived packaging materials in Wessanen branded products.

7.6 PESTICIDE POLICY

7.6.1 INTRODUCTION

The terminology “pesticides” refers to all chemical plant protecting agents.

The appropriate management of pesticide residues is important and regulated in food. For organic foods, it is critical, and of course, it is one of the most essential expectations of organic food consumers.

This document has been written to facilitate our suppliers and us to work together in ensuring the organic quality of our products.

7.6.2 SUPPLIER QUALITY EXPECTATIONS

According to Wessanen’s Supplier Quality Management policy, suppliers are expected to maintain a risk based approach to residue testing and share the results with Wessanen upon request. Main risks to be taken into consideration are:

- Type of raw material
- Origin of raw material
- Size of batches
- Homogeneity of received raw material batch

Analytical tests must be performed in ISO17025 accredited laboratories and have a proven track record in the analysis of pesticides residues in the material product matrix, including the participation in ring trials.

Wessanen will carry out its own risk assessment and accordingly, a supplementary monitoring plan and will, when appropriate, share the results with the supplier.

7.6.3 POLICY

This policy applies to organic products.

An organic product is considered not to conform for Wessanen when analysis result in presence:

- **1 residue > 10 ppb or**
- **sum of all residues > 20 ppb**

Analytical variance (given by the laboratory) is taken into account only if a maximum 2 molecules are detected.

In case of single ingredient dried products, the following reconstitution factors will be used to calculate the level in raw material.

Reconstitution factors	**Factor**
Dried fruits: General Exception: Dates	5 1
Dried herbs: General	4
Dried vegetables: General	10
Spices and Seeds: General Exception: Aniseed, Fennel, Caraway and similar seeds	5 1

If pesticides are detected at levels above, the following steps must be followed:

1. The party identifying the issue (either Wessanen or the supplier) informs the other one immediately.

2. The product must be put on hold pending investigation and decision.
3. Further analysis must be done to confirm or not the contamination

Second analysis	**Third analysis** **(in a different accredited lab)**	**Conclusion**
Conform	Conform	contamination not confirmed
	Not Conform	Contamination confirmed
Not Conform	Not applicable	

4. In parallel to analysis, the supplier must carry out investigations on his raw material data to identify the root cause.
5. If non conformity is confirmed, both the supplier and Wessanen will inform their respective certification body about the contamination and identified root cause. Certification bodies will make their recommendation. Wessanen's certification body recommendation will be followed.
6. If the contamination is confirmed:
    a. Wessanen and the supplier will define and agree a corrective action plan.
    b. All costs linked to the issue will be borne by the supplier.

7.7 PALM OIL POLICY

7.7.1 INTRODUCTION

Wessanen is committed to the sourcing of certified sustainable palm oil. This oil is produced by palm oil plantations which have been independently audited and found to comply with the globally agreed environmental standards devised by the Roundtable on Sustainable Palm Oil (RSPO).

The following text is from RSPO Supply Chain Certification Standard; as adopted by the RSPO Board of Governors on 21 November 2014, revised 14 June 2017:

1. Introduction

The Roundtable on Sustainable Palm Oil (RSPO) is a global, multi-stakeholder initiative on sustainable oil palm products. Members of RSPO and participants in its activities come from many different backgrounds, including plantation companies, manufacturers and retailers of oil palm products, environmental and social NGOs, and from many countries that produce or use oil palm products. The principal objective of RSPO is "to promote the growth and use of sustainable palm oil through cooperation within the supply chain and open dialogue between its stakeholders".

2. Scope

The oil palm products may go through many production and logistical stages between the grower and the product. The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. Any oil palm product can be traded through one of four supply chain models that are approved by RSPO:

- *Identity Preserved*
- *Segregated*
- *Mass Balance*
- *Book and Claim*

For the first three of these, supply chain controls from the oil palm plantations to the certified end product are required. This document sets out the requirements for an organization controlling RSPO certified oil palm products for the RSPO Identity Preserved, Segregated, Mass Balance and the Book and Claim supply chain models. All claims made must be in accordance with the published RSPO Rules on Market Communications and Claims.

7.7.2 Scope

Wessanen is committed to the use of sustainable palm oil in both its organic and conventional branded products.

7.7.3 Policy

When palm oil is needed, we strive to have Certified Sustainable Palm Oil, preferably Identity Preserved or segregated, and tolerate Mass balance supply chains.

By exception, we will compensate use of non-sustainable palm oil with RSPO credits.

7.7.4 Implementation

Wessanen's commitment to certified sustainable palm oil is achieved by:

- Involving all palm oil containing products suppliers, so that they become RSPO certified
- Certifying our own local supply chains, and using the RSPO logo in our products when appropriate
- Substituting palm oil whenever possible
- Preferably developing new products without palm oil

In 2017, we moved from locally managed RSPO certifications, to one corporate multi-site certification.

8 MAIN AMENDMENTS

Please find below the main amendments from one version to another.

8.1 FROM VERSION FEB. 2014 TO VERSION MAR. 2015 (ISSUE 1)

Chapter	Amendments
1	Change: For questions on the documents, please contact your Wessanen Quality representative
3	Change: Supplier evaluation adapted for Suppliers that maintain a GFSI certification
4.5	New: Food Fraud Management
7.2	New: Food Fraud Policy
7.4	Update: Non-GM Ingredient Policy 7.4.3. Policy ……do not use the ingredient batch if contamination is: ➢ > 0.1% for all organic raw materials; ➢ > 0.1% for conventional ones if there is a GMO free claim on the final product; ➢ > 0.9% for other conventional raw materials; ➢ unless a stricter limit is defined in the specifications;
7.6	Update: Pesticide Policy 7.6.3. Policy An organic product is considered not to conform for Wessanen when analysis result in presence: ➢ 1 residue > 10 ppb **or** ➢ sum of all residues > 20 ppb
7.7	Update: Palm Oil Policy to include the new RSPO principles
	Removal: Nutritional Policies

8.2 FROM VERSION MAR. 2015 TO VERSION DEC. 2017 (ISSUE 2)

Chapter	Amendments – ISSUE NR. 2
	Document renamed from Supplier Quality Booklet to Product Quality Booklet – to address the point that this document is to be used in both Wessanen factories and third party suppliers.
1	Added that the booklet is to be used also by Wessanen factories
4.1	Renamed from Corporate Ethics and Sustainability to Corporate Social Responsibility
4.2	Renamed from Organization and Responsibility to Organization
4.5	Renamed from Food fraud management to Risk management – also addressing wider risk scope
7.3	Updated: Allergen Management Policy

8.3 FROM VERSION DEC. 2017 TO VERSION SEPT. 2018 (ISSUE 3)

Chapter	Amendments – ISSUE NR. 3
	No changes, just document links corrections

8.4 FROM VERSION SEPT.2018 TO VERSION SEPT. 2019 (ISSUE 4)

Chapter	Amendments – ISSUE NR. 4
3.1	Supplier selection and approval – specific mention of copies of documents to be sent to Wessanen for supplier approval
4.1	Corporate Social Responsibility • Link to new Supplier Code of Conduct • Reference to new Wessanen Supplier Ethical Policy (7.1)
5.6	Added that suppliers must have at least ***two consumer unit per batch*** as retention sample till end of shelf life
7.1	Replace Supplier Code of Conduct by Wessanen Supplier Ethical Policy
7.3	Updated Allergen Management Policy
7.4	Extended non-GMO ingredient policy to microbes and microbial products (such as enzymes, etc.)
7.5	Non-GMO packaging policy applied to all Wessanen branded products
7.7	Updated reference to RSPO newest standard (revised 14 June 2017); change Green Palm to RSPO credit; reference to Wessanen multi-site certification