# Global Warehousing, Handling and Storage Quality Expectations

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Note: The structure of this document is based on ISO 9001:2008. Requirements Chapters 1, 2 & 3 which deal with the scope, references and definitions for the ISO Standard are not applicable in this document.

See Glossary on page 26 for further definitions about used Terms.

Table of Contents

<table>
<thead>
<tr>
<th>Chapter</th>
<th>Description</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Objective and Scope</td>
<td>3</td>
</tr>
<tr>
<td></td>
<td>Revision log</td>
<td>3</td>
</tr>
<tr>
<td>4.</td>
<td>Quality Management System</td>
<td>4</td>
</tr>
<tr>
<td>5.</td>
<td>Management Responsibility</td>
<td>5</td>
</tr>
<tr>
<td>5.1.</td>
<td>Top Management</td>
<td>5</td>
</tr>
<tr>
<td>5.2.</td>
<td>Responsibility, Authority and Communication</td>
<td>5</td>
</tr>
<tr>
<td>5.3.</td>
<td>Food Regulatory Agency Inspections and Contacts</td>
<td>5</td>
</tr>
<tr>
<td>6.</td>
<td>Resource Management</td>
<td>6</td>
</tr>
<tr>
<td>6.1.</td>
<td>Good Manufacturing Practices</td>
<td>6</td>
</tr>
<tr>
<td>6.2.</td>
<td>Competence, Awareness and Training</td>
<td>7</td>
</tr>
<tr>
<td>6.3.</td>
<td>Employee Illness and Communicable Diseases</td>
<td>8</td>
</tr>
<tr>
<td>6.4.</td>
<td>Infrastructure</td>
<td>8</td>
</tr>
<tr>
<td>6.5.</td>
<td>Maintenance control.</td>
<td>9</td>
</tr>
<tr>
<td>6.6.</td>
<td>Sanitation Controls</td>
<td>9</td>
</tr>
<tr>
<td>6.7.</td>
<td>Pest Control</td>
<td>10</td>
</tr>
<tr>
<td>7.</td>
<td>Product Realization (Service Provision)</td>
<td>12</td>
</tr>
<tr>
<td>7.1.</td>
<td>Requirements Related to the Product / Service</td>
<td>12</td>
</tr>
<tr>
<td>7.2.</td>
<td>Customer Related Processes and Communication</td>
<td>12</td>
</tr>
<tr>
<td>7.3.</td>
<td>Design and Development</td>
<td>12</td>
</tr>
<tr>
<td>7.4.</td>
<td>Procurement</td>
<td>12</td>
</tr>
<tr>
<td>7.5.</td>
<td>Product Receipt &amp; Shipping Controls</td>
<td>13</td>
</tr>
<tr>
<td>7.6.</td>
<td>Requirements for transportation</td>
<td>14</td>
</tr>
<tr>
<td>7.7.</td>
<td>Special Requirements for Temperature Controlled</td>
<td>16</td>
</tr>
<tr>
<td>7.8.</td>
<td>Storage (including temperature range definitions)</td>
<td>16</td>
</tr>
<tr>
<td>7.9.</td>
<td>Identification and Traceability</td>
<td>17</td>
</tr>
<tr>
<td>7.10.</td>
<td>Control of Monitoring and Measuring Devices</td>
<td>18</td>
</tr>
<tr>
<td>8.</td>
<td>Measurement, Analysis and Improvement</td>
<td>18</td>
</tr>
<tr>
<td>8.1.</td>
<td>Hold &amp; Release / Control of Non Conforming Product</td>
<td>18</td>
</tr>
<tr>
<td>8.2.</td>
<td>Returns</td>
<td>21</td>
</tr>
<tr>
<td>8.3.</td>
<td>Internal Audit &amp; External Audits</td>
<td>21</td>
</tr>
<tr>
<td>8.4.</td>
<td>Mondelez International Quality Auditor Access</td>
<td>21</td>
</tr>
<tr>
<td>8.5.</td>
<td>Corrective and Preventive Action</td>
<td>22</td>
</tr>
<tr>
<td>8.6.</td>
<td>Confidentiality</td>
<td>22</td>
</tr>
<tr>
<td>9.1.</td>
<td>Sites in U.S. or shipping to U.S.</td>
<td>23</td>
</tr>
<tr>
<td>9.2.</td>
<td>International Sites outside U.S. / not shipping to U.S.</td>
<td>24</td>
</tr>
<tr>
<td>9.3.</td>
<td>General Program requirement</td>
<td>24</td>
</tr>
<tr>
<td>9.4.</td>
<td>Mondelez International TAPA TSR Level 3 Requirements</td>
<td>25</td>
</tr>
<tr>
<td>Appendix A</td>
<td>Glossary</td>
<td>26</td>
</tr>
<tr>
<td>Appendix B</td>
<td>Special Situation Management Information Template</td>
<td>28</td>
</tr>
<tr>
<td>Appendix C</td>
<td>Food Defense Information</td>
<td>29</td>
</tr>
</tbody>
</table>
**Objective:** A primary objective of Mondelēz International is to market safe products of consistent quality that meet or exceed the expectations of our customers and consumers. The requirements given in these expectations are designed to help our warehousing, storing, and handling partners to meet this objective by identifying those programs which will help protect product safety and quality, prevent product retrievals, consumer complaints, and rework. In summary, the application of these expectations and other documents, contain the basic elements needed to assure effective management of Food Safety, Quality and the protection of products from willful contamination [Food Defense]. These expectations and associated documents do not alter, override or replace any requirements given in government regulations, which must also be met.

**Scope:** all Mondelēz International owned and contracted facilities that store Mondelēz International Finished and Semi finished goods, Raw and Pack material, Premiums, Advertisement /POS materials- (Warehouses under Mondelēz International manufacturing, co manufacturing, Business Units responsibility; All distributors, cross-docking and fulfillment companies; North America DSD Sales Branches)

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**Revision Log:**

<table>
<thead>
<tr>
<th>Date Revised:</th>
<th>Supersedes:</th>
<th>Section</th>
<th>Summary of Revision:</th>
</tr>
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<tbody>
<tr>
<td>12.08.2013</td>
<td>Global Warehousing, Handling, Storage, Re-packing &amp; Transportation Quality Expectations 10.08.2010 R04</td>
<td>Whole Document</td>
<td>1) Clarified Terminology Warehousing term; inserted revision log and new format of table of context; 2) Replace Kraft Foods with Mondelēz International term 3) Eliminated Appendix 1; Renamed Glossary Appendix 2 to Appendix A and Appendix 3 and 4 to Appendix B 4) Replaced bullet points with numbering to improve cross references needed during audits, system implementation, etc.. 5) all changes highlighted in purple Font</td>
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<td>12.08.2013</td>
<td>new</td>
<td>5.1 Management responsibilities</td>
<td>Added Special Situation management and Annex C</td>
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<tr>
<td>12.08.2013</td>
<td>change</td>
<td>6.1 GWP</td>
<td>Restructured existing GWP requirements to match GMP manual format.</td>
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<tr>
<td>12.08.2013</td>
<td>1) New</td>
<td>7.5 receiving</td>
<td>1) Added Transport Incident - Product Risk assessment requirement into receiving requirements section (QP 8.3 – 01-01) 2) Deleted “If possible” for replacement requirement of seal in case it is broken by authorities</td>
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<td>12.08.2013</td>
<td>2) change</td>
<td>7.5 receiving</td>
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<td>new</td>
<td>7.6 Transportation</td>
<td>Added requirements out of the existing Mondelēz International global GMP manual</td>
</tr>
<tr>
<td>12.08.2013</td>
<td>change</td>
<td>7.8 term “Dry Storage”</td>
<td>Temperature range +10 to +25 °C / 50 to 77 °F, relative humidity &lt; 65% (before +15 to 25°C)</td>
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<td>12.08.2013</td>
<td>change</td>
<td>8.1 Hold and Release</td>
<td>Table according QP change in 2012, changes highlighted in violet, added example for Warehouses</td>
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<tr>
<td>12.08.2013</td>
<td>change</td>
<td>8.6. Confidentiality</td>
<td>Added more descriptive text to explain situations Mondelēz International approval need to be given</td>
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<tr>
<td>12.08.2013</td>
<td>Change / new</td>
<td>9. Food defense requirements</td>
<td>Change: Rephrased the explanation of food defense and security New: 9.1 and 9.3.1 – standard requirements added; 1.3 – added “through audit” requirement; Added Food defense requirements from 2016 onwards to enable necessary preparation. Addition of TAPA TSR Level 3 requirements for transport companies</td>
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<tr>
<td>12.08.2013</td>
<td>change</td>
<td>Annex A Glossary</td>
<td>Added GST, Traded Unit, Consumer Unit</td>
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</tbody>
</table>
4. Quality Management System

4.1. The Warehouse Operator shall establish, document, implement and maintain a quality management system as a means of assuring that Mondelēz International 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, Mondelēz International specifications and any applicable regulatory requirements.

4.2. The quality management system documentation shall include:

4.2.1. Documented procedures for the warehousing, handling, storage, and transportation of Mondelēz International materials and products.

4.2.2. Documented procedures for the Control of Documents and Records related to Mondelēz International materials and products including outsourced Services like Pest Control, Storage, Cleaning, etc. (see Section 7.4 Procurement).

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

4.2.4. Documentation shall be up-to-date and available to staff at all locations to enable them to perform their role in the quality system.

4.3 Document and data retention for Mondelēz International materials and products shall be in compliance with Mondelez International’s Record Retention policy (see table 1) or as per local Mondelēz International business/regulatory requirements.

<table>
<thead>
<tr>
<th>Mondelēz International Retention rule</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Internal Procedure number</strong></td>
<td><strong>Procedure Name</strong></td>
</tr>
<tr>
<td>MAN 1060</td>
<td>Equipment calibration</td>
</tr>
<tr>
<td>MAN 1180</td>
<td>Product testing/Quality control</td>
</tr>
<tr>
<td>MAN 1240</td>
<td>Production records</td>
</tr>
<tr>
<td>MAN 1280</td>
<td>HACCP plan</td>
</tr>
<tr>
<td>LOG 1060</td>
<td>Receiving Documentation</td>
</tr>
<tr>
<td>LOG 1080</td>
<td>Shipping Documentation</td>
</tr>
</tbody>
</table>
4.4 Supplier Quality Management

4.4.1 Quality requirements and specifications in accordance with Mondelēz International Quality requirements shall be documented and address the programs and controls which suppliers must have in place to assure the safety, quality and regulatory compliance of purchased goods and services that will be used for Mondelēz International products.

4.4.2 A procedure shall be in place to approve suppliers, including a process for qualification, evaluation, approval, and maintenance.

5. **Management Responsibility**

5.1. **Top management**, or the person or group of people who direct or control the organisation at the highest level, shall provide evidence of its commitment to the implementation of Mondelēz International global warehouse, storage and handling quality expectations. A member of site management shall have the responsibility and authority to assure that the quality management system is established, implemented and maintained.

5.2. **Responsibility, Authority and Communication**

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

5.2.2. **Special Situation Management:**

- Every Warehouse / Service Provider shall establish, document, implement and maintain programs for the identification, communication and management of potential or actual Special Situations
- The programs shall assure a rapid, accurate and appropriate response to issues which may arise.
- Each facility shall have a person with nominated responsibility for Special Situations. The facility nominee shall have established links with the Mondelēz International Quality Representative and / or regional Mondelēz International Special Situations Team Coordinators.
- SST info template see Appendix B

5.3. **Food Regulatory Agency Inspections and Contacts**

5.3.1. Each facility shall have a system in place to provide written and oral notification to Mondelēz International immediately (on the same day, at the latest the next working day) of any of the following which may relate to materials or products stored for Mondelēz International:

- Visits, inspections or sample collections from external regulatory bodies
- Regulatory actions or product hold due to regulatory sampling
- Product holds directed by a regulatory or law enforcement body due to Food Defence related threat or suspicion, or
- Product retrievals

5.3.2. Each facility shall have designated personnel trained in the management of regulatory inspections.

5.3.3. A written procedure shall be in place to describe the process for notification, follow up and closure of any issues arising from inspections or contacts.

5.3.4. Mondelēz International contact name and address shall be available and current.

5.3.5. A traceability report must be immediately issued for the concerned lot (quantity received in the warehouse, in stock, and shipped out by delivery point and by date) and be available for the Mondelēz International Contact.
5.3.6. If any product stored for Mondelēz International is sampled by a regulatory agency, all products with the same lot code as that sample (SKU/production period) shall be placed on hold and the Mondelēz International contracting representative contacted for instruction prior to release. The inspector shall be asked what tests will be carried out, what method will be used and when results will be available. Decisions on subsequent action to be taken will be made by the Mondelēz International quality representative and shall be documented.

5.3.7. A duplicate sample of the lot of any material taken by the external regulatory bodies is required by Mondelēz International. These samples shall be stored at the facility unless requested by a Mondelēz International Quality representative.

5.3.8. Samples shall be labelled and stored under appropriate conditions.

6. Resource Management

6.1 Good Warehousing Practices (GWP)

Good Manufacturing Practices shall be established to ensure that products are stored and handled under sanitary conditions.

6.1.1. Employee Personal Practices

- The Warehouse Operator shall assure that all personnel, visitors and contractors follow the GWP.
- Product Tampering: Any intentional act by an employee which could render a Mondelēz International product, or package unsafe for consumers will result in termination. The Company will pursue all legal remedies, including, but not limited to, criminal prosecution.
- Employees who observe any intentional act which might compromise the safety of any ingredient, product or package are required to immediately report this activity to their supervisor or manager.
- Personal Hygiene: Employees must maintain a high degree of personal cleanliness; Controls shall 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.
- Hot and cold water, soap/sanitizer, hand drying facilities and a waste bin must be available at hand washing and cleaning stations.
- Prohibited Acts: To help prevent product contamination, the following actions are not allowed in Product / material handling and storage areas:
  - Eating or drinking, chewing gum or tobacco, smoking, holding objects in the mouth (e.g. toothpicks), and spitting. If smoking is permitted in a facility it is only allowed in designated areas.
  - Littering and other poor housekeeping practices are not allowed. All refuse must be placed in properly identified containers.
- Garbage facilities / compactors shall be adequately covered (e.g. the food source that attracts birds to warehouses/storage areas is generally around the dumpster or compactor, or along the truck docks.)
- Effective sanitation programs that eliminate these food sources must be maintained.
- Lunches must be stored in designated areas and must be completely enclosed.
- Personal lockers must be maintained clean, free of trash and soiled clothing.
- Products / Materials must not be stored immediately adjacent to containers for waste or non-product items (e.g. cleaning compounds).
- Packaging Storage Practices: Packaging materials in full or partial quantities must be adequately protected and stored in a sanitary manner. Identification and traceability must be maintained. All items should 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 not acceptable. Over stacking of product must be avoided.
6.1.2. Receiving, Handling, Storage and Shipping Practices

- Extraneous Matter Controls:
  - Glass and brittle materials including hard plastic components and equipment should be avoided in product handling / storage areas where possible. If their use is necessary a glass and hard plastic inspection program and breakage procedure shall 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.
  - A pallet inspection program shall 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 shall cover:
    - New pallets
    - Incoming goods pallets
    - Shipped product pallets
    - Waste / disposable pallets
  - Soiled and dusty exteriors of cartons or other product containers shall be cleaned before they are conveyed into the warehouse or to customers.
  - Broken or spilled product shall be cleaned up in a timely manner
  - 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 should be an 18 inch/45 cm gap to allow for inspection. Where this is not possible, alternative means of access must be demonstrated.
  - Fork lift trucks (FLT) shall be in good repair, clean, free from leaks. FTL utilized inside a facility shall preferably be electric powered. Liquid Petroleum Gas (LPG) (Propane) is acceptable. Gasoline or diesel powered FTL only allowed to be used outside facility
  - FLT batteries shall be stored in a designated area in such a way as to avoid risk of material or product contamination. New technology batteries, which have a lower risk level, may require less strict segregation.
  - All materials and products shall be properly identified and labelled

6.1.3. Grounds:

- Recyclable Materials: Recyclable materials collection areas must be kept clean and neat. Materials shall be removed at a frequency to minimize pest harborage. Appropriate signage must be posted to identify the area.
- Equipment and Materials Storage: Exterior storage of equipment and materials -- including, idle equipment, contractor supplies, or other items -- should be minimized through routine inventory assessments and neatly stored off the ground and away from the building.
- Doors and gates (e.g. cargo doors) shall not be left open when not in use.
- Vegetation and grass close to the WH need to be cut regularly and managed.

6.2. Competence, Awareness and Training

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

- The quality system required to meet Mondelēz International Warehousing, Handling, Storage, Re-packing and Transportation Quality Requirements, Mondelēz International 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.
- Induction training sessions must be organised for temporary personnel as needed (according to personnel turnover)
- Visitors entering production areas shall also be trained in relevant personal and food safety practices.

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

6.3. Employee Illness and communicable Disease:
The Warehouse Operator shall establish written instructions for the control of employee illness and communicable diseases that may result in pathogen transmission by food products. These instructions shall be available and communicated to all applicable persons

6.4. Infrastructure
In order to maintain a safe working environment, it is important that infra-structure and equipment are designed to make it easy to establish and maintain sanitary conditions. When commissioning or designing new production or storage facilities the Mondelēz International Quality Representative should be contacted who can arrange for appropriate guidance to be provided.

6.4.1. Facility Design: The design and construction of the building, including utility fixtures shall prevent and must not present a potential contamination source to the products produced or handled.

6.4.2. The facility shall be of sound construction and free from leaks.

6.4.3. The internal and external structure shall be free of cracks, holes, openings, or any other areas that would allow harbourage or entry of pests. (Guidance: a mouse can enter through a gap of less than 10mm)

6.4.4. Supply conduits (air, water, electricity) shall be installed in such a way (e.g. under the floor) that they do not provide a cleaning/foreign matter/pest control issue.

6.4.5. 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 moulds or dirt).

6.4.6. Floors, walls, ceilings, overheads and drains shall be cleanable and constructed to resist deterioration from product or cleaning chemicals.

6.4.7. All light fixtures in finished product and/or raw material storage areas shall be shielded or have plastic coated bulbs to prevent contamination in case of breakage. Where this is impractical a documented glass breakage control procedure shall be in place and followed.

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

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

6.4.10. Access to utilities (e.g. water supply, heating, ventilation) shall be controlled to prevent unauthorized access.

6.4.11. Where wet cleaning is necessary, floors shall be adequately designed to prevent standing water. If applicable, all new floor drain installations shall be trapped and vented to prevent sewer gas entry, and must be accessible and cleanable. Existing floor drains which are not trapped and vented shall be sealed, or a plan made for their replacement.
6.4.12. Hand washing and restroom facilities shall be appropriately designed and maintained.
6.4.13. Grounds shall be maintained to prevent risk of pest harbourage, and be free from idle machinery and equipment, litter, debris and odour.
6.4.14. The façade or installations shall not be a harbourage or nesting place for birds or other pests.
6.4.15. During construction, adequate controls shall be in place to prevent contamination and ensure adequate sanitation (no dust).
6.4.16. The facility must be capable of providing appropriate temperature and humidity requirements for storage or transport in order to meet Mondelēz International specifications for the products concerned. In addition, provision must be made for segregation of products susceptible (biscuits, chocolate) to odor migration from those products that have strong aromas (mint flavoured gum). See Storage chapter for specific requirements details.

6.5. Maintenance Controls
6.5.1. A documented preventive maintenance program shall 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 Mondelēz International contracted conditions. This includes but is not limited to all materials handling equipment and utilities (cooling systems, air ventilation systems, trucks, containers, forklifts, hoses, alarms etc.).

6.6. Sanitation Controls
6.6.1. The facility shall have a documented sanitation/housekeeping program in place. The program shall 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
6.6.2. The building (ceilings, overheads, walls and floors) and transportation equipment (containers, etc.) shall be free from dust, debris, insect webbing, mould growth, etc.
6.6.3. Sanitation procedures, schedules and records of cleaning shall be documented.
6.6.4. A system for verifying the effectiveness of the sanitation program of the entire facility and the transportation vehicles shall be in place.
6.6.5. Precautions shall be taken for protection of products during cleaning activities.
6.6.6. Cleaning chemicals, equipment and materials used shall have approved specifications. All cleaning, sanitizing and disinfecting products shall be suitable for use in a food handling environment in order to minimize odour.
6.6.7. Hazardous materials or chemicals (e.g. pesticides, cleaning materials, disinfectants) shall be secured, segregated from Mondelēz International product storage areas and access restricted to allow use by designated employees only.
6.6.8. Proper tools must be utilized to prevent extraneous matter contamination of the product (e.g. separate tools for floors, drains).
6.6.9. The risk of allergen cross contamination due to broken or split product / material of nearby product need to be assessed. In case of risk identified an effective allergen clean up procedure need to be implemented.
6.7. Pest Control

6.7.1. A documented pest control program and practices shall be in place to effectively prevent pest activity in the facility and grounds.

6.7.2. A complete and accurate map of installed traps, glue boards, insect-electrocutors, pheromone traps and external bait stations shall be available. Bait stations shall be of solid construction and tamper resistant. External stations shall be secured (e.g. linked to the wall by a chain, bolted to the floor using a wire retainer).

6.7.3. Pest Control Inspections shall be conducted and recorded. Listed below is the appropriate frequency for inspections based on activity.

<table>
<thead>
<tr>
<th>Table 2 Flying insects</th>
<th>Min Inspection Frequency</th>
<th>Cleaning Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Insect light traps</td>
<td>Monthly</td>
<td>Monthly</td>
</tr>
<tr>
<td></td>
<td>(Can be adjusted seasonally in agreement with Mondelēz International Quality contact)</td>
<td></td>
</tr>
<tr>
<td>Pheromone traps</td>
<td>Bi-weekly (Where used)</td>
<td>Replace as needed.</td>
</tr>
<tr>
<td></td>
<td>(Can be adjusted seasonally in agreement with Mondelēz International Quality contact)</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Table 3 RODENT TRAPS - Interior</th>
</tr>
</thead>
<tbody>
<tr>
<td>Control Level</td>
</tr>
<tr>
<td>A (high)</td>
</tr>
<tr>
<td>B (moderate)</td>
</tr>
<tr>
<td>C (low)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Table 4 RODENT TRAPS - Exterior</th>
</tr>
</thead>
<tbody>
<tr>
<td>Control Level</td>
</tr>
<tr>
<td>A (high)</td>
</tr>
<tr>
<td>B (moderate)</td>
</tr>
<tr>
<td>C (low)</td>
</tr>
</tbody>
</table>

6.7.4. Documentation of pest control checks shall include all necessary information, e.g. pest control operator, date of check, pesticide usage (type, amount of pesticide, application, lot codes, location, targeted pest and time of treatment), result of inspection and recommendations.

6.7.5. If pest activity or deficiencies in the pest control program are noted, corrective actions shall be taken and controls increased appropriately. All corrective actions shall be recorded. (See table above)

6.7.6. Pest activity data must be analysed and documented to show trends in activity (e.g. insect light traps, pheromone traps and interior rodent traps)

6.7.7. Manual or electronic (e.g. Rapid Trax or Pro-Track) trending of activity is 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.
6.7.8. Pest management contractors must be appropriately licensed by the relevant local authority, and maintenance of that license shall be a condition of contract. Certified pest control contractors or personnel with equivalent training shall perform pest control activity.

6.7.9. Insurance requirements shall be included in the contract. A copy of the contractor’s liability coverage shall be maintained and available at the facility. In cases where liability insurance is not available, the use of contracted pest management services shall be approved by the Mondelēz International Region Director of Quality and local Mondelēz International Law & Compliance.

6.7.10. Pesticide use and application shall be strictly controlled and in accordance with the label and lot numbers shall be documented on usage records to assure traceability.

6.7.11. All pesticide labels and Material Safety Data Sheets (MSDS) or equivalent material addressing safety precautions shall be available.

6.7.12. It is the responsibility of the Operator to assure that any pesticide, including fumigation chemicals, used in direct contact with any packaged food product or ingredient is applied in accordance with label directions and is approved for the purpose intended.

6.7.13. In general, pesticides should not be stored inside the warehouse areas. If internal pesticides storage is necessary, they shall be stored in a dedicated (only pesticides), lockable area, which is ventilated, signed and inventoried monthly.

6.7.14. Residual insecticides may never be applied as a fog or aerosol.

6.7.15. Rodenticides used must be in block form for use outside of the facility only. Rodenticide granulates; paste, pellets or powders are NEVER permitted.

6.7.16. In the rare case that rodent activity requires use of rodenticides inside the facility, secure, tamper resistant traps or bait stations must be used and Mondelēz International Corporate Sanitation must give approval prior to use. Rodenticides are generally not permitted inside facilities because poisoned rodents can hide and die away from the bait station. Rodents can also transport poisonous bait within the facilities.

6.7.17. All ingredients, equipment, and supplies received must be inspected upon receipt for rodent excreta or any bite signs on the containers to ensure that rodents do not enter the facility via incoming loads.

6.7.18. All openings (walls, roof) including any openings used for ventilation must be screened to prevent insect or rodent ingress.

6.7.19. Only approved pesticides shall be used in manufacturing and distribution facilities. 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 http://www.pesticideinfo.org/Search_Products.jsp#ProdSearch (PAN) as a BAD Actor Product. The search should first be performed utilizing the pesticide’s active ingredient. If there are no results then the search should be done by the products trade name, or if applicable the products EPA registration number.

6.7.20. In the event a pesticide being considered for use does not meet the criteria, or major pesticide application (e.g. fumigation) in the warehouse area where Mondelēz International products are stored, it must be notified and confirmed in advance to the Mondelēz International contact person.
7. **Product Realization (Service Provision)**

7.1. **Requirements Related to the Product / Service**

7.1.1. The company shall not handle store or transport products for Mondelēz International before a formal contract is signed by both parties.

7.1.2. New locations must be approved by Mondelēz International prior to use (including Quality approval)

7.2. **Customer Related Processes and Communication**

7.2.1. The Operator shall determine and implement effective arrangements for communicating with Mondelēz International in relation to:

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

7.2.2. The company shall have a system in place to notify in writing the Mondelēz International Quality Representative prior to any changes in storage or handling location facility or processes that may impact the quality, labelling or functionality of a finished product.

7.2.3. In cases where the Warehouse Operator receives complaints from a Mondelēz International customer, notification shall be made to Mondelēz International immediately. The customer complaint should be acknowledged, but no response given by the Operator on behalf of Mondelēz International without prior authorization.

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

7.3. **Design and Development**

The Operator shall comply with:

7.3.1. Functional and performance requirements specified by Mondelēz International, including a documented plan to control potential food safety hazards (biological, chemical and physical). The plan shall 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.

7.3.2. Applicable statutory and regulatory requirements. Storage and transportation of Mondelēz International materials and products shall 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.

7.3.3. Specifications

- The company shall assure that authorised Mondelēz International instructions and/or specifications (reviewed and signed by authorised Mondelēz International representative) are in place.
- The company shall have policies and procedures in place to assure products meet all Mondelēz International specifications.
- All specification changes must be approved by Mondelēz International Representatives

7.4. **Procurement**

7.4.1. Controls shall be in place to assure that any purchased materials or services which affect Mondelēz International materials or products, or service provision, comply with the Contract 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 Defence and Security**
• Packaging items (shrink foil, slip sheets, pallets)

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

7.4.3. The Mondelēz International Quality Representative shall be notified prior to contracting third party outside storage or transportation of Mondelēz International products.

7.4.4. Mondelēz International Requirements shall be documented and communicated to all contracted third party warehousing and transportation providers.

7.5. Product Receipt & Shipping Controls

7.5.1. Documented procedures for receipt and shipping of Mondelēz International products shall be defined for all stages of the distribution process. These shall include, at a minimum:
• Incoming material and product quantities shall be recorded and verified against delivery documents.
• Conformance to specified parameters / specification shall be verified for all applicable incoming materials.
• Any damaged or non-conforming stock shall be held and Mondelēz International notified.
• Controls for deliveries to warehouses including customs clearance shall be defined and in place.

7.5.2. The following inspection and acceptance criteria shall be in place and documented:
• Inbound and outbound vehicles shall be verified to be clean, dry, free from leaks, off-odours and unusual residual materials (powder or liquid) prior to loading/unloading.
• Materials and products shall be inspected for damage, infestation, and temperature abuse, potential security concerns such as perforated cases, exposure to moisture or unusual odours.
• All full inbound and outbound truckloads shall be sealed at dispatch by the responsible warehouse employees using a numbered, tamper evident, tamper resistant metal seal. Seal must be applied and the number recorded on the shipping documents by warehouse personnel and not the transport driver. Upon receipt, the seal shall be inspected by receiving warehouse personnel for integrity and the number shall be verified to match the delivery documentation. In the event that it is not possible to seal a vehicle, or vehicle arrives unsealed, approval by Mondelēz International Regional Security and Mondelēz International Quality Representative shall be in place prior to unloading (inbound) or dispatch (outbound). [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], Mondelēz International expects the transport company to maintain the integrity and security of the load throughout the transit.
• All openings (doors, inspection ports, hatches, etc.) on outbound shipments shall be sealed with a numbered, tamper evident, resistant seal and the seal number(s) annotated on the shipping documentation and loading control documents.
• 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. A replacement numbered seal should be applied, and details recorded on the load documents.
• 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). If there is evidence of unsatisfactory shipping practices or tampering, then the materials must be either rejected and returned, or immediately placed on hold. A risk assessment shall be carried out by Mondelēz International Quality representative to
determine the potential impact on the product (Examples: prohibited materials within the shipment, prior use of the vehicle to haul prohibited materials (placing the current shipment at risk of contamination), improper temperature control, broken, illegible, or missing seals, or seal numbers that do not match the Bill of Loading)

7.5.3. Inbound and outbound bulk containers shall be sealed. 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

7.5.4. Where materials, packaging or product belonging to Mondelēz International has been involved in incidents connected to theft, damage or unauthorized intrusions which occurred during the transport of goods, resulting from actions / events outside of Mondelēz International control, a documented risk assessment must be made prior to redistribution or disposal. The risk assessment shall be conducted by Mondelēz International Quality Representative, or a trained Warehouse operative approved by Mondelēz International Quality Representative. The use of 3rd party inspection companies shall be approved by Mondelēz International Quality Representative. The final disposition decision shall be in all cases be approved by Mondelēz International Quality Representative.

7.5.5. Procedures for reporting stock or delivery issues (e.g. shortages, delayed deliveries) shall be agreed with Mondelēz International contracting manager.

7.5.6. Orders shall be picked, assembled and verified against Mondelēz International delivery documentation.

7.5.7. Deliveries shall be palletized and wrapped according to Mondelēz International specifications.

7.5.8. Loads shall be assembled to Mondelēz International / customer specifications, in such a way as to safeguard the product (e.g. heavy products at bottom). Appropriate restraints such as load locks, inflatable air bags and corrugated void fillers shall be used to protect product in transit from shifting and to minimize damage in transit.

7.6. Requirements for transportation:
Warehouse operator should ensure that carrier used has following capabilities and requirements are followed:

7.6.1. Product quality and integrity shall be preserved during transport.

7.6.2. Solid top, hard-sided, lockable or reinforced soft-sided vehicles shall be used. In regions where such equipment is not practical or available, the storage and transport conditions of the target markets shall be considered when determining suitable transport vehicles.

7.6.3. Vehicles must be specified as suitable for transportation of dry foodstuffs (clean, free from odours, and have no detectable leaks).

7.6.4. Use of tankers dedicated to food only- with records available for the previous product shipped, and appropriate cleaning and sanitizing (including hoses, valves & pumps)

7.6.5. Temperature controlled vehicles must carry suitable on board temperature monitoring devices, which alert the driver in case of failure. The haulier shall have a procedure in place to periodically verify the effective operation of temperature monitoring and temperature control devices

7.6.6. Avoid storage of product directly in front of cooling equipment where this may impact product quality

7.6.7. Procedures for dealing with vehicle or refrigeration systems breakdown must be in place, and include notification to Mondelēz International management.
7.6.8. All trailers used for the transport of Mondelēz International product will comply with
- The relevant legislation governing the transportation of such products as laid down but not necessarily limited to local legislations.
- All trucks must allow sealing of the goods
- Clean, Pest and Odor free
- Dry (no condensation on floor, walls or roof);
- In good overall condition;
- Robust floor, to enable safe loading and unloading operations
- Doors/curtains must maintain an effective seal to the external environment
- Free from any material that may damage products
- Where internal lighting is present in trailers, it must be protected. No unprotected glass bulbs, no broken glass or broken hard plastic protective covers.
- Compatible with security seal mechanism as advised in security manual
- Equipped with fully functional temperature monitoring and recording equipment (for the carriage of goods with temperature restrictions)

7.6.9. Trailer interiors must be free from all debris and odors from previous loads that can either mark or taint packaging or product. Trailers must not have transported any uncooked animal proteins e.g. Meat and Fish, agricultural products or any chemicals or other products / materials which exhibit strong / unpleasant odours.

7.6.10. Intermittent unloading: Bulk railcars or trucks that are docked and/or connected to the plant for intermittent unloading for a period over 24 hours shall have adequate controls in place to prevent unauthorized access. Examples of these controls include:
- Sealed connection points
- Doors and hatches re-sealed or locked in between unloading
- Bulk railcars or trucks are contained within an enclosed space with a roof and secure doors (Note: Gates and fences are not considered sufficient to prevent access).

7.6.11. The controls must be checked daily or upon resumption of unloading after a lapse of more than 24 hours to ensure there has been no unauthorized access.

7.6.12. Chocolate and Biscuit products can only be loaded with Gum products having the authorization of the Mondelēz International Quality Representative (based on risk assessment including test results, product type and packaging)

7.6.13. Chocolate, Candy and Gum products may be only transported in chilled conditions with the authorization of the Mondelēz International Quality Representative

7.6.14. Mondelēz International specify and communicate the required product handling conditions for Warehousing, Handling, Storage, Re-packing and Transportation Where specified, monitoring of temperature and humidity must be carried out using calibrated recording equipment. This recording equipment shall be located in representative locations Additionally, a reporting system with corrective action plans for out of acceptable range results shall be defined, documented and agreed with Mondelēz International Quality Representative

7.6.15. Carriers have to ensure technical ability to log temperatures inside trailer and document them accordingly. Temperature protocols need to be verified by the carrier on regular basis and kept for minimum one year. Suitable are either print outs (hard copies) or online documentation via remote data retrieval which can be made available to Mondelēz International personnel and/or Mondelēz International warehouse operators. Records must be retained as specified by the Mondelēz International Records Retention Policy. See reference in Section 4.3
7.7. Special Requirements for Temperature Controlled/Conditioned, Chilled and Frozen storage/distribution (where product specifications require temperature controls):

7.7.1. At a minimum, surface temperature of product (e.g. outer case) on incoming vehicles shall be checked and recorded prior to unloading.

7.7.2. Risk assessment, checks and procedures need to be in place to avoid the risk of condense water on pallets / in product pack.

7.7.3. Trucks/Containers shall be conditioned to the specified temperature prior to loading.

7.7.4. Internal temperature of the vehicle shall be checked and recorded before loading.

7.7.5. Curtains or flaps shall be used where outside temperature is out of the specified range and loading areas are not controlled.

7.7.6. Products shall be pre-chilled/frozen to the specified temperature prior to loading. and product shall be kept at specified temperature at all times; any interruptions shall be addressed and recorded.

7.7.7. At locations where drop trailers are permitted, warehouse operator will ensure that temperature checks are performed at a minimum once per 8 hour period for those temperature controlled trailers in operation.

7.8. Storage

7.8.1. Fork lift trucks (FLT) shall be in good repair, clean, free from leaks. FTL utilized inside a facility shall preferably be electric powered. Liquid Petroleum Gas (LPG Propane) is acceptable. Gasoline or diesel powered FTL only allowed to be used outside facility.

7.8.2. FLT batteries shall be stored in a designated area in such a way as to avoid risk of material or product contamination. New technology batteries, which have a lower risk level, may require less strict segregation.

7.8.3. The condition of product in stock shall 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.

7.8.4. Access to storage areas, including products, packaging materials and exterior storage areas (e.g. tanks, silos) must be restricted to authorized personnel only.

7.8.5. An effective FIFO (first in first out) or FEFO (first expired, first out) system shall be in place for all materials or products stored for Mondelēz International.

7.8.6. Products or materials which have a strong odour shall be segregated to avoid cross contamination.

7.8.7. Pallets, racks and equipment shall be maintained in good condition to prevent any physical damage to materials or products (e.g. free from nails, wood splinters etc.).

7.8.8. Airflow from heaters / refrigeration units shall be directed away from materials and products.

7.8.9. Food, returned products, pet food and non-food items shall be handled and stored in a manner to avoid contamination (e.g. moths in dry pet food) or transfer of odours. Dividers or other precautions, e.g. traffic controls, separate air systems should be used for protection.

7.8.10. Pallets need to be appropriately inspected to assure that they are clean, dry and free of pests or mould. Pallets must not be stored outside the warehouse building.

7.8.11. 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.

7.8.12. Direct sunlight on product shall be avoided.

7.8.13. Mondelēz International is responsible to specify and communicate the required product handling conditions for Warehousing, Handling, Storage, Re-packing and Transportation. Where specified, monitoring of temperature and humidity must be carried out using calibrated recording equipment. This recording equipment shall be located in representative locations. Additionally, a
reporting system with corrective action plans for out of acceptable range results shall be defined, documented and agreed with Mondelēz International.

7.8.14. Terms in common use for Transport and Storage conditions are:

**Ambient Storage**
Prevailing conditions with no control over temperature or humidity required or expected.

**Dry Storage**
Prevailing conditions controlled to avoid absorption of humidity from air.
Temperature range $+10^\circ$C to $+25^\circ$C / $50^\circ$F to $77^\circ$F, relative humidity $< 65\%$.

**Conditioned Storage**
Temperature controlled within a defined range of $+10^\circ$C to $+20^\circ$C / $50^\circ$F to $68^\circ$F. Humidity max $65\%$.

**Chilled / Refrigerated Storage**
Temperature controlled within a defined range of $+1^\circ$C to $+8^\circ$C (34°F to 45°F). Humidity range not defined. Consistent with US FDA requirements.

**Refrigerated**
Temperature controlled within a defined range of $+1^\circ$C to $+4^\circ$C / $34^\circ$F to $40^\circ$F. Humidity range not defined. Consistent with USDA Food code for meat products.
Procedures in place to assure that products are pre chilled to required temperature prior to loading, and vehicles are pre chilled prior to loading for distribution.

**Frozen Storage**
Temperature controlled within a defined range, typically $–18^\circ$C to $–30^\circ$C / $0^\circ$F to $-22^\circ$F. Humidity range not defined. Procedures in place to assure that products are pre frozen to required temperature prior to loading and vehicles are pre frozen prior to loading for distribution.

**Super Chill**
Temperature controlled within a defined range of $-3^\circ$C to $-0.5^\circ$C / $27^\circ$F to $31^\circ$F. Humidity range not defined. Procedures in place to assure that products are pre chilled to required temperature prior to loading, and vehicles are pre chilled prior to loading for distribution.

**Protected**
Temperature controlled within a defined range of $+1^\circ$C to $+35^\circ$C / $34^\circ$F to $95^\circ$F. Humidity range not defined.

**Tanker Transfer of Chocolate Masses & Fillings sold as product [e.g. to external manufacturer]**
Temperature controlled within a defined range typically within $+40^\circ$C to $+55^\circ$C / $104^\circ$F to $131^\circ$F. Humidity range not defined.

Where local regulations specify conditions for Warehousing, Handling, Storage, Re-packing and Transportation of products these shall also be met. Where temperature ranges are specified for storage these shall also apply to transportation. Effective operation of vehicle chiller units shall be verified by temperature measurement.

7.9. Identification and Traceability

7.9.1. All Mondelēz International businesses and contracted services shall meet the GS1 global requirements

7.9.2. All Facilities shall have a documented system for the identification and traceability of Mondelēz International products and materials in place.

7.9.3. This system shall allow the Warehouse Operator to trace within 4 hours the entire history of a specific lot from receipt through all stages of storage and shipping. This shall 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 shall be allowed in tracing the individual product components of bundled products with mixed code dates provided Mondelēz International shall still have sufficient time to provide the full history of the products being traced within 24 hours.

7.9.4. Traceability requirements apply to all finished products and materials (in process products, re work, primary packaging materials, secondary packaging components when product ingredient line information printed on, printed, pre packed subcomponents, premiums and part
finished products and/or process intermediates being shipped to further locations for further processing)

7.9.5. Periodic recall exercises shall be carried out by the warehouse operator to verify system capability (minimum annually) and documented including Corrective Actions.

7.9.6. To facilitate this process incoming Mondelēz International products shall be identified either with the Mondelēz International given code or by a lot number through which the source, date received and any special characteristics of the material can be determined.

7.9.7. All shipping containers/units shall bear traceability information that is consistent with the information which appears on the consumer unit.

7.10. **Control of Monitoring and Measuring Devices**

7.10.1. The Operator shall determine the monitoring and measurement to be undertaken and devices needed to provide evidence of conformity of service to specified requirements.

7.10.2. A Procedure for measuring and monitoring equipment calibration shall be documented. A calibration program of control devices e.g. thermometers, humidity controls, scales, etc. shall be in place. This shall include:

   - Master list of equipment to be calibrated, identification number, location, frequency of calibration and acceptance criteria.
   - 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

7.10.3. Calibration activities shall be documented and corrective action to be taken when the results of a calibration are out of the specified limits.

7.10.4. When measuring equipment is found to be out of standard, a risk assessment shall be completed to determine any product implications regarding food safety, quality or regulatory.

7.10.5. Notification to Mondelēz International in cases of equipment or calibration failure.

7.10.6. Calibration shall 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 shall be documented.

8. **Measurement, Analysis and Improvement**

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

8.1.1. A written hold & release control program shall 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.

8.1.2. Personnel shall be designated with the authority and responsibility for management of Hold and Release Programs, including monitoring and tracking held product through to final disposition. (close out)

8.1.3. The Operator shall 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 in table 4 below.

8.1.4. A record of ALL hold events shall be maintained. Available information must include:

   - The hold category
   - Code date(s), quantity and/or time affected
   - Reason for hold
   - Investigative information
   - Final disposition and authorisation
   - Inventory verification and reconciliation

8.1.5. Any materials or products suspected or identified to be non-conforming shall be placed on hold immediately upon discovery or immediately when requested by Mondelēz International
Management. If the non-conformity is detected by the Operator Mondelēz International shall be notified immediately.

8.1.6. Where non-conformance is detected in products which are already in distribution the Mondelēz International Contact shall be notified immediately. Consideration must be given to identification and segregation of remaining stock (at other storage or distribution sites) that requires documented corrective or preventive action.

8.1.7. The specific reason for hold should not be shown on the tag or hold sticker, a reason code should be used [except where local regulations require indication of the hold reason].

8.1.8. Full traceability of all non-conforming products shall be in place and inadvertent movement shall be prevented through an effective system; inventory shall be controlled.

8.1.9. A systematic evaluation/audit of the hold and release program will be conducted at least annually at each site to assure the system functions properly. This audit and the follow up and close out of relevant identified corrective actions need to be documented.

8.1.10. Where product or material placed on hold needs to be moved to external storage or between facilities, procedures must be in place to maintain the integrity of the hold status.

8.1.11. A process shall be in place to immediately notify Mondelēz International when any material or product stored for Mondelēz International, or designated for shipment to a Mondelēz International facility or to the trade is inadvertently released from hold.

8.1.12. Held product inventories must be reconciled at the time when final disposition is implemented and at any inventory count action taking place.

8.1.13. A training and awareness session will be conducted at least annually for all personnel involved with hold and release activities.

8.1.14. Any material or product hold must be classified into one of three 3 types of Hold in table 5.

8.1.15. Disposition for non-conforming products and / or products on hold must be approved in writing by a designated Mondelēz International representative.

8.1.16. Complete evidence/documentation of destruction (e.g. certificates), including identification of materials and products destroyed, and shall be retained.

8.1.17. Destruction of unsatisfactory materials and products shall be supervised to assure they cannot re-enter the distribution chain.

8.1.18. Any labelled material or product that is dispositioned for destruction or animal feed must be disfigured or destroyed to assure that Mondelēz International Trademarks cannot be reused in any manner.

8.1.19. Only Mondelēz International approved contractors or third parties shall be authorized to manage transportation and destruction of non-conforming product.

8.1.20. All products dispositioned for destruction that is unfit for human or animal consumption shall be identified in the accompanying documentation.

8.1.21. In the case of destruction by a third party, the contract with the third party shall specify the method of destruction, security measures, verification of destruction, final destination of the nonconforming product including company name and contact, and regulatory and environmental requirements must be met.
<table>
<thead>
<tr>
<th>TABLE 5</th>
<th>Category 1 Hold</th>
<th>Category 2 Hold</th>
<th>Category 3 Hold</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Use for:</strong></td>
<td>When a non-conformity poses a confirmed product safety issue, or major quality concern—for example:</td>
<td>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:</td>
<td>When other reasons exist for needing to hold product or material, unrelated to food safety or regulatory issues. For example:</td>
</tr>
<tr>
<td></td>
<td>• Undeclared Allergens identified in product or material</td>
<td>• A non-conformance which causes the ingredients on the ingredient list to be in the wrong order.</td>
<td>• Finished product awaiting test results which are a required for a COA. (Excludes Pathogen testing)</td>
</tr>
<tr>
<td></td>
<td>• Failure to meet CCP/sPP requirements as defined in individual CCP/sPP models</td>
<td>• Net Contents compliance lot average is below the stated label weight claim.</td>
<td>• Product produced as a result of a trial</td>
</tr>
<tr>
<td></td>
<td>• Contamination due to employee illness</td>
<td>• Non-conforming product pending corrective action completion, re-testing and, or final disposition decision. (for example wrong product on pallet, open product, soft packs)</td>
<td>• In cases where pathogen testing on every lot of finished product is not specified:</td>
</tr>
<tr>
<td></td>
<td>• Unacceptable pathogen test result</td>
<td>• Deviation from a CCP/sPP requirement pending investigation or further actions</td>
<td>a) Rework pending pathogen testing results.</td>
</tr>
<tr>
<td></td>
<td>• Presence of an undeclared ingredient</td>
<td>• Finished product awaiting results of testing</td>
<td>b) Finished product made using materials or rework with pending pathogen test results.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Notify Mondelēz International Quality Representative.</th>
<th>Required</th>
<th>Required for regulatory non-conformances only</th>
<th>Not Required</th>
</tr>
</thead>
</table>

| Disposition | Designated person (usually from plant quality) to manage disposition in collaboration with Mondelēz International Quality Representative | Designated person will maintain communication with the appropriate facility manager and manage disposition activity. | Designated person will conduct the necessary communication to assure adequate control, and manage disposition activity. |

<table>
<thead>
<tr>
<th>Identification &amp; Segregation</th>
<th>Each of the following requirements must be met:</th>
<th>All affected product or material must be visually identified as being on hold within its storage location. (e.g. segregation of an entire bay using ‘ON HOLD’ tape/placard, or specified area within a high rise facility designated only for product on hold). Where product or material need to be moved to external storage or between facilities, each shipping unit shall be visually identified as being on hold. Product or Material should be placed in a segregated area.</th>
<th>All affected product or material must be visually identified, or computer identified, or computer controlled, or both. The method adopted must provide effective control.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• Each shipping unit of product or material must be visually identified with hold stickers, tags or tape.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Product or Material must be placed in a segregated and secured area</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>For all Hold Categories:</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>• „Inadvertent movement or use must be prevented.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• „Where computerized stock control systems are in use, product shall be electronically obstructed from movement/use and only designated, authorized employees shall have the ability to modify the status or location. Where it is feasible, physically obstruction of the goods shall also be used for additional control. In addition, there must be a defined, documented and effective system in place and agreed with Mondelēz International Quality Representative to prevent inadvertent movement or use.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• „Where no computerized stock control system is in place, or it is not possible to assign responsibilities only to specific authorized employees to modify the status or location of the product, product/materials shall be physically obstructed.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Inventory Checks</th>
<th>Inventory checks for Category 1 &amp; 2 holds must account for physical quantities present and be reconciled against all hold records (including electronic warehouse records, hold forms, and electronic hold files).</th>
<th>A defined frequency, documented in local procedures, which is adequate to assure control</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Verification daily on facility operating days.</td>
<td>Inventory verification minimum monthly, or at close-out of hold event if sooner.</td>
<td></td>
</tr>
</tbody>
</table>
8.2. Returns
8.2.1. A procedure for handling returned materials and products shall be in place to prevent re-entry in the distribution chain.
8.2.2. Drivers shall not accept returns from delivery points unless authorised in advance by the Mondelēz International contracting manager, Mondelēz International warehouse manager, or Mondelēz International Customer Service. (Returns do not include deliveries or part deliveries which are not accepted by the customer).
8.2.3. Mondelēz International 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 Mondelēz International authorized personnel.
8.2.4. Returned product inventories must be reconciled at the time when final disposition is implemented and at any inventory count action taking place before.
8.2.5. Where raw materials, ingredients, packaging or product belonging to Mondelēz International has been involved in incidents connected to theft, damage or unauthorized intrusions which occurred during the transport of goods, resulting from actions / events outside of Mondelēz International control, a documented risk assessment must be made prior to redistribution or disposal. The risk assessment shall be conducted by Mondelēz International Quality Representative, or a trained Warehouse operative approved by Mondelēz International Quality Representative. The use of 3rd party inspection companies shall be approved by regional/ BU quality. The final disposition decision shall be in all cases be approved by Mondelēz International Quality Representative.

8.3. Internal Audit & External Audits
8.3.1. An internal audit program shall be established, documented and maintained to verify the effectiveness of the quality system.
8.3.2. Where the Warehouse Operator has a quality management system which is registered under the ISO QMS standard, all requirements for internal audit given in the standard shall be met. Where the Operator does not have a quality management system which is registered, sufficient internal verification activity shall be carried out to assure that Mondelēz International requirements are met (minimum review each two years).
8.3.3. All facilities shall have effective programs for managing audits conducted by third parties in areas where Mondelēz International products are managed. This shall include but is not limited to:

- Appropriate controls to restrict disclosure of confidential and/or proprietary Mondelēz International information, products and processes.
- Follow up and closure of any non-conformances.
- Notification to Mondelēz International of any serious issues raised during the audit. Corrective actions identified during both internal and external (e.g. third party) audits shall form part of the audit report and responsibility for tracking corrective actions to close-out shall be identified.

8.4. Mondelēz International Quality Auditor Access
8.4.1. Mondelēz International quality auditors shall be authorised to enter and audit/inspect at reasonable times any establishment storing, shipping or handling Mondelēz International products.
8.4.2. The audit/inspection may include review of records, processes, controls and facilities that demonstrate that storage of products for Mondelēz International are in line with requirements and specifications.
8.4.3. Limitations: An audit/inspection shall not extend to financial data, sales data (other than that directly related to Mondelēz International), pricing data or personnel data (other than data regarding qualifications of technical and professional personnel perform functions pertinent to the audit).
8.4.4. Notification of Audits: It is Mondelēz International policy to give advance notice of intent to conduct an audit/inspection. However, nothing in any contract shall deny the right of Mondelēz International to conduct unannounced audits by its own agents, or through firms/agencies that conduct audits under contract.

8.4.5. Mondelēz International auditors shall not be exposed to confidential technology, which could compromise Mondelēz International business at a later date. Mondelēz International auditors must be informed prior to the scheduled audit in this instance, as it is Mondelēz International policy not to sign confidentiality agreements with service suppliers/Warehouses prior to or at the time of a quality audit.

8.5. Corrective and Preventive Action

8.5.1. Corrective action shall 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 Mondelēz International Warehouse, Storage and handling Quality Requirements or regulatory requirements.
- Regulatory authorities identify conditions that may violate laws or regulations. The Mondelēz International contracting representative shall be notified of violations which directly or indirectly impact products stored for Mondelēz International and the actions taken to correct the violation and prevent reoccurrence.
- Non conformities are identified during Mondelēz International quality audits.

8.5.2. In such cases, a root cause analysis shall be conducted, documented and actions taken to prevent recurrence. Corrective Actions shall be tracked, monitored, and verified as effective.

8.6. Confidentiality

8.6.1. All sites shall 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 Mondelēz International confidential information.

8.6.2. Where confidentiality is required by Mondelēz International, it will be specified in the contract. If any pre-existing confidentiality agreement is in place this shall be reviewed to assure that the new information being exchanged is covered by the terms of the agreement. Procedures shall be in place to assure the adequate documentation of confidentiality is completed prior to the exchange of information.

8.6.3. Any information, which is already in the public domain, cannot be subject to Confidentiality.

8.6.4. The use digital or film cameras, including cellular telephones, or other devices which have picture taking or document copying capability, to photograph or copy products or processes which are proprietary to Mondelēz International is prohibited. Inspectors wishing to make sketches or diagrams of the process and or facility shall be requested to treat these as confidential and be stamped as confidential if agreed to by the inspector. If possible, a copy should be taken and retained by the facility.

8.6.5. Specific technical information related to Mondelez International products, including information such as product formulae or supplier details shall be treated as confidential. [routine production records relevant to the inspection may be shown]

8.6.6. Certain regulatory inspectors may be entitled to take copies of Mondelēz International documents [sketches or diagrams made by the inspector for their own uses are permitted. If possible retain a copy, and request that the inspector treats as confidential. In all cases, any documents or copies of documents viewed or retained by auditors, regulatory inspectors must be recorded by the warehouse operator and immediately reported to the Mondelez International Representative.
9. Food Defence and Supply Chain Security

Mondelēz International has a responsibility to consumers and sometimes Governments to secure our services and operations from the threat of intentional contamination of the food supply chain. These responsibilities need to be embraced by our key partners, distribution and transportation service providers, carriers, etc. and are reflected within this document. At Mondelēz International we call these efforts Food Defense and we depend on our warehouses, carriers, copackers and repackers to do their part. Correspondingly, warehouses, carriers, copackers and repackers acting on behalf of Mondelēz International which pack, or in any way handle ingredients, packaging or final product, shall develop specific procedures to secure our product, to deter and prevent intentional contamination and will have protocols in place to quickly and accurately identify, respond to and contain threats or acts of intentional contamination. Likewise, warehouses, copackers and repackers will ensure their suppliers adopt similar protocols and implement appropriate controls.

The laws and government expectations regarding Food Defense vary from country to country. Food manufacturers, carriers and handlers that operate in the United States or that ship into the United States have the most stringent requirements in the world*. Elsewhere laws can be less prescriptive. Mondelēz International implements an internationally recognized certification program to help us meet legal and consumer expectations. Warehouses, Copackers and Repackers that meet international industry standard TAPA FSR 1 level C are considered to meet the minimum Mondelēz International Food Defense standards. Carriers which meet international industry standard TAPA TSR 2 level 3 are considered to meet the minimum Mondelēz International transportation standards 3. Partners are to ensure that they can demonstrate achievement of those standards on request to Mondelēz International.

*Note that in addition, the Customs-Trade Partnership against Terrorism (CT-PAT) 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. CT-PAT and Food Defense are mutually supportive, although separate programs, formed and enforced under different elements of US legislation. Both are mandatory for manufacturers, handlers and/or shippers of Mondelēz International product to the USA. Warehouses, Copackers and Repackers which meet, and can demonstrate certified compliance with, international industry standard TAPA FSR level A are considered by US Customs to meet the requirements of CTPAT.

Additional information, useful websites and related regulations are contained in Appendix C: Food Defense Information the detailed Mondelēz International requirements under TAPA TSR 3 are contained at Section 9.4 of this document

Warehouses, Co packers and Re packers are required to implement following program:

9.1. Warehouses, Copackers and Repackers acting on behalf of Mondelēz International 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 Mondelēz International confirmation, through audit as required, that they have done and will continue to do so:

9.1.1. Adopt and maintain (by 2016) a Food Defense program including the essential elements at (3) below and which meets ISO 28000 / TAPA FSR Level C (sites) / TAPA TSR Level 3 (transport) requirements and standards

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1 Transferred Asset Protection Association (TAPA) Freight Security Requirement (FSR) designed for securing warehouse, logistics and distribution centre control of goods.
2 Trucking Security Requirement (TSR) (Updated 2012) designed for securing road transportation of high value cargo.
3 TAPA TSR standards for MDLZ as set out in the Appendix are mandatory and auditable as such as of 1 Jan 2016. In the interim, transport security is expected to achieve basic security standards as defined elsewhere in this document and in applicable contractual agreements.
9.1.2. FDA facility registration list. Complete and maintain registration in the Mondelēz International FDA facility registration list.

9.1.3. 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.

9.1.4. Detained product. Ensure detained product is held as directed by Mondelēz International (See Chapter Measurement, Analysis and Improvement).

9.1.5. Meet C-TPAT Import Security Criteria if making shipments to the U.S. but originating elsewhere.

9.1.6. Container Security. When transporting a container or trailer for a C-TPAT importer, a high security seal that meets or exceed the current PAS ISO 17712 standards for high security seals must be utilized.

9.2. Mondelēz International Warehouses, Copackers and Repackers based outside the US and/or which 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 (including those essential elements outlined at (3) below) and must be prepared to provide Mondelēz International confirmation, through audit as required, that they have and will continue to:

9.2.1. Adopt and maintain a Food Defense Program as above which meets ISO 28000 / TAPA C / TSR 3 requirements and standards.

9.2.2. Clearly-defined roles and responsibilities of those individuals responsible for maintaining the program.

9.2.3. Procedures for reporting threats or acts of intentional contamination to Mondelēz International (in every instance) and to others (as required by local law).

9.3. As part of this program and noting the importance of these elements, all Warehouses, Copackers and Repackers will specifically ensure that the following are in place:

9.3.1. Access control. All sites will have an appropriate access control system to deter people with the intent of harming our products from gaining access to do so. Warehouses, copackers 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

9.3.2. Background Screening. Warehouses, Copackers and Repackers will conduct background screening checks on employee candidates. Local 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.

9.3.3. Shipping and Receiving. The Warehouse/ Repacker/Copacker will take deliberate steps, and implement procedures, to monitor and verify the identity of drivers and vehicles, the state of vehicles as well as the integrity of incoming and outgoing shipments. All deliveries in and out of warehouses shall be transported in appropriately sealed containers / vehicles. (See Sections on Product Receipt and Shipping Controls and Storage elsewhere in this document). Special regulations may apply on specific routes; carriers are to ensure that they comply with any such special regulations. Warehouses / Repackers / Copackers will monitor compliance by carriers as part of their Food Defense program and report discrepancies to Mondelēz International.
9.4. **TAPA TSR Level 3 Requirements.**

### Management Support and Responsibilities protocols: Security Management

A business must:

* Appoint a senior responsible person for supply chain security within the business.
* Have a documented security policy (With review schedule)
* Hold current Insurance policy covering max value of load.
* Be able to supply policy number, name and address of Insurance company & proof of payment as required to MDLZ

### Training Protocols: Security Training

A business must:

* Have a documented & recorded driver training program for security awareness

### Physical Security: Truck\Trailer Security

As a minimum vehicles supplied must have:

* Anti-Slash curtain sides (or hard sided)
* Trailer immobilisation devices fitted and operating when trailer dropped
* Two way communication systems fitted

A business must:

* Have a documented sealing procedure
* As a minimum use a metal strip seal (or stronger)
* Overseas (Bolt seal) High Security Seals CTPAT and ISO 17712:2010 compliant

* [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], Mondelēz International expects the transport company to maintain the integrity and security of the load throughout the transit

### Management Support and Responsibilities protocols: Investigations

A business must:

* Have a formal process for recording security incidents (Inc. Incident log) to include truck thefts, partial thefts, clandestine intrusions.

### Management Support and Responsibilities protocols: Sub-contracting

A business must:

* Have a documented and recorded sub-contractor review process
* Have a contractual relationship in place with the subcontractors (Inc. Security standards equal to or exceeding Mondelēz International’s; prohibiting further subcontracting)
* Have a documented and recorded process to verify the above
Appendix A – Glossary

- **Consumer Unit:** Trade item purchased by the consumer. May also be referred to as ‘consumer package’ or ‘retail package’. May be an individual item (e.g. individual chocolate bar, jar of coffee), or a multipack

- **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 shall 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 Defence:** Safeguarding the food supply against intentional acts (or threat of an act), such as mass contamination and product tampering. Food Defence should not be confused with Food Security which, as defined by the World Health Organisation (WHO), includes concerns about the availability of a sufficient national food supply.

- **GS1:** GS1 is an international non-profit association dedicated to the development and implementation of global specifications to management of supply and demand chains across multiple sectors. (industry and trade used). Standards are BarCodes (GTIN), eCom, GDSN & EPCglobal. Solutions cover Data Quality, Traceability see: http://www.gs1.org/

- **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 Mondelēz International department/third party company providing a service (e.g. storage, transport) involving the handling of Mondelēz International products/raw materials.

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

- **Pathogen:** A food borne microorganism recognized as a public health hazard that can cause illness or death in humans.

- **Pesticides:** Compounds classified as such by the regulatory authorities 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.

- **Product returns:** Within Mondelēz International Control: Third party warehouses directly contracted to Mondelēz International, including the warehouses of Co-packers, and with systems approved by Mondelēz International audit are considered to be within Mondelēz International control. Outside
Mondelēz International Control: Product returned from trade or customer’s own warehouses, distributors or stores

- **Purchased Materials**: equipment, services or materials purchased for use in the Mondelēz International 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**: Organisational structure, policies, programs and procedures needed to manage product quality.
- **Regulatory Action**: A seizure, embargo, hold of any product or a prosecution, injunction, citation, regulatory letter or notice of adverse findings from a regulatory authority or any federal, state, provincial or local court.
- **Regulatory Authority**: Any duly authorised agent or employee of any government agency empowered to enforce laws relative to food products. Any religious organisation which defines requirements for special product certification (i.e. Kosher or Halal).
- **Regulatory Contact**: A visit, inspection, audit, survey, inquiry or other contact by any regulatory authority that results in the identification of objectionable conditions which require a response. This does not include those visits made on a regular basis (i.e. daily, weekly, monthly), unless such a visit reveals a material or product destined for a Mondelēz International 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
  - The company, its employees, products, 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
  - Mondelēz International 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 Mondelēz International.
- **Traceability**: The ability to track a specific lot of ingredient/component to the product which contains it; and to track a finished product to the primary external customer(s) or destination(s).
- **Traded Unit or Shipping Case**: Trade item which does not pass the point of sale, e.g. carton, case, bag, stand-alone product display.
- **Tankers**: closed bulk haulage
# APPENDIX B – Special Situations Management – Information Template

## Special Situations Required Information

1. **Site Contacts** – Key contacts in the event of a Special Situation Arising.

<table>
<thead>
<tr>
<th>Situation</th>
<th>Name, Contact Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Who at Mondelēz International would you contact if an issue arises at any time of night or day, 365 days a year?</td>
<td></td>
</tr>
<tr>
<td>Who at your facility is Mondelēz International to contact in the event of an issue at any time of night or day, 365 days a year?</td>
<td></td>
</tr>
</tbody>
</table>

2. **What does your facility consider to be a Special Situation?**

<table>
<thead>
<tr>
<th>Question</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>What is your definition of a Special Situation?</td>
<td></td>
</tr>
<tr>
<td>Give examples of the potential issues that would be included in your definition:</td>
<td></td>
</tr>
<tr>
<td>Do your procedures and training include all relevant internal and external events and circumstances?</td>
<td></td>
</tr>
<tr>
<td>What are the circumstances under which Mondelēz International must be immediately contacted?</td>
<td></td>
</tr>
</tbody>
</table>

## Special Situations Information

3. **Does your facility have a formal program with trained staff?**

<table>
<thead>
<tr>
<th>Question</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Are site specific procedures for communication and management of Special Situations (SS) documented and communicated?</td>
<td></td>
</tr>
<tr>
<td>Are key personnel identified and trained, with clearly defined responsibilities?</td>
<td></td>
</tr>
<tr>
<td>Have identified personnel been identified and trained in recognition and communication of SS?</td>
<td></td>
</tr>
<tr>
<td>Do procedures require immediate verbal notification to the Mondelēz International Special Situations Contact?</td>
<td></td>
</tr>
<tr>
<td>Do procedures require provision of root cause analysis, corrective action, and close out?</td>
<td></td>
</tr>
<tr>
<td>Do procedures include requirements for security and confidentiality of information related to potential or actual SS?</td>
<td></td>
</tr>
</tbody>
</table>
Appendix C – FOOD DEFENCE INFORMATION

Warehouses, Copackers and Repackers may contact their Mondelēz International contact to obtain samples of our internal Food Defense support materials which draw upon PAS 96 process and procedures to protect our internal manufacturing sites. However as above and as of 2016, compliance with the provisions of the Transported Asset Protection Association (TAPA) Freight Security Requirement (FSR) level C and Truck Security Requirement (TSR) level 3 demonstrate the necessary standard of security. For TSR level 3, specific guidance for Mondelēz International is contained at Section 9.4. of this document. Below are links for further information.

TAPA:
Europe
http://tapaemea.com/public/index.php?navId=1&subnavId=1
US
http://www.tapaonline.org/
Asia:Bhttp://www.tapa-asia.org/

C-TPAT
Please note that shipments from outside the U.S. or Canada must meet the C-TPAT Import Security Criteria, please click on the link for specific information:
(http://www.customs.ustreas.gov/xp/cgov/import/commercial_enforcement/ctpactm/importer_criteri.xml)
C-TPAT members: http://www.cbp.gov/xp/cgov/trade/cargo_security/ctpactm/members/
C-TPAT Foreign Manufacturers:

FOOD & DRUG ADMINISTRATION (FDA):
Reportable Food Registry Section 417 of the FDCA.
http://www.accessdata.fda.gov/videos/CFSAN/ALERT/alert01.cfm

UNITED STATES DEPARTMENT of AGRICULTURE (USDA) & FOOD SERVICE INSPECTION SERVICES (FSIS)
FDA/USDA - "An Introduction to Food Security Awareness"
http://www.fda.gov/ora/training/orau/FoodSecurity/startpage.html

DEPARTMENT OF HOMELAND SECURITY (DHS)
CBP – Customs-Trade Partnership against Terrorism Security Criteria