

Date

Dear Valued Supplier,

Sysco's Independent Audit Program (IAP) is being enhanced to address new food safety preventive controls that we are implementing to improve our food safety risk mitigation practices and to comply with the new Food Safety Modernization Act of 2011. We have defined a high risk product as a Potentially Hazardous Food that may contain pathogenic microorganisms and will normally support the formation of toxins or growth of pathogenic microorganisms. We have conducted a risk analysis of our products and identified our suppliers of high risk products. All facilities producing high risk products are asked to comply with our new supplier approval process. This process requires submission of an independent third party Food Safety and Sanitation Audit or a GFSI Benchmarked Certification Audit. Your facility has been identified as supplying one or more of our Sysco Operating Companies with high risk products. This new process ONLY applies to non branded suppliers of high risk foods. Sysco branded suppliers will continue to be approved by Sysco Quality Assurance through our formal audit process. iCiX (International Compliance Information Exchange) will assist Sysco's Food Safety and Quality Assurance Team with management of our Independent Audit Program documentation requirements. We look forward to your participation in the program.

Sysco Independent Audit Program requirements include:

- All high risk supplier facilities must submit an independent third party audit on an annual basis.
 - Accepted audit formats include traditional independent Food Safety Audits as well as GFSI benchmarked audit schemes.
 - Audits must include GMPs, food safety, and food defense. (See 2012 Independent Audit Program Guidelines below for a complete list of approved agencies to conduct these audits.)
- All suppliers are requested to inform Sysco, through use of the iCiX system, of their most recent audit
 results if you have already had an audit completed within the current calendar year, or the scheduled
 audit date for CY2012 if not yet completed. Submit this information by Date.
- Your company will be receiving correspondence from iCiX in the coming days with an internet link to the Sysco IAP Continuous Release Form.
 - All supplier facilities must be members of iCiX to electronically access the Continuous Release Form.
 - o All suppliers must agree and execute the Continuous Release Form available on the iCiX website.
 - All suppliers are requested to complete the Continuous Release Form by Date.

Included with this letter are the revised Sysco 2012 IAP Guidelines. Please distribute this information to the appropriate individuals within your organization who will be responsible for managing compliance with these new requirements. Your participation is required, and imperative in maintaining approval to market products to Sysco. We appreciate your support of our food safety risk mitigation efforts, and thank you in advance for your full cooperation and compliance. Please direct any questions on the IAP to XXX at 281.584.XXXX

Sincerely,

Sysco Quality Assurance 1390 Enclave Parkway Houston, TX 77080 281-584-1350



SCO 2012 Independent Audit Program Guidelines

All suppliers and co-packing facilities described as "approved" in these Guidelines to process, pack or market products to Sysco will be required to undergo an annual audit. Audits submitted must be within 13 months of the previously completed audit. In addition, these facilities must comply with the requirement for FDA registration and if applicable, verify that the facility has been registered by the FDA regulation. Please note: For those suppliers selecting a GFSI recognized audit scheme, audits can be completed by any certification body that is accredited to do so. The certification audits can be announced. Suppliers selecting a standard audit may only use the auditing firms listed below.

ALL supplying facilities to Sysco of these types must be compliant with the Independent Audit Program:

- > ALL Sysco Brand Supplier facilities
- > ALL High Risk Non-Sysco brand Supplier facilities.
- ALL Sourced non-branded supplier facilities

The Sysco approved independent auditing agencies for domestic suppliers are:

Approved for all facilities (except chemical and non food/supplies and equipment facilities):

AIB International

Leslie Ackerman

LAckerman@aibonline.org

Phone: 785-537-4750 ext. 268, Fax: 785-537-0106

Food Safety Net Services

Jerome Pieniazek

Jerome.pieniazek@fsns.com

Phone: 210-308-0675 ext. 239, Fax: 210-525-1702

GMA-Safe (QMI-SAI Global)

Joyce Wiggins

joyce.wiggins@saiglobal.com

Phone: 216-654-0907, Fax: 216-654-0889

NSF Cook & Thurber

Helen Gipple gipple@nsf.org

Phone: 734-827-6845, Fax: 734-827-7779

Randolph Associates, Inc.

Barbara Jackman

barbara.jackman@raiconsult.com

Phone: 205-595-6455 ext. 229

Fax: 205-595-6450.

<u>Intertek</u>

Erin Kelley

erin.kelley@intertek.com

Phone: 312-674-4581, Fax: 630-481-3101

Silliker, Inc.

Todd Dechter

todd.dechter@silliker.com

Phone: 312-938-5151, Fax: 312-729-1320

Process Management Consulting

Bob Thrash

rwthrash@bellsouth.net

Phone: 615-646-1640, Fax: 615-646-3822

Canadian facilities may also select: Guelph Food Technology Centre

Linda Duncan Iduncan@gftc.ca

Phone: 519-821-1246, ext. 5031,

Fax: 519-836-1281



SCO 2012 Independent Audit Program Guidelines

Canned or Frozen Fruit and Vegetable, Produce, Shell Egg and Seafood facilities may also select:

<u>USDA</u>: Approved for all types of facilities except those which are regulated by FSIS.

Canned or Frozen Fruit and Vegetable

Donna Burke-Fonda

<u>Donna.Burke-Fonda@ams.usda.gov</u> Phone: 202-720-3167, Fax: 202-720-8871

Produce

Nate Tickner

nate.tickner@ams.usda.gov

Phone: 800-811-2373, Fax: 202-720-0393

Shell Egg

Jeff Waite

Jeffrey.Waite@ams.usda.gov

Phone: 202-720-4411, Fax: 202-690-3165

USDC

Seafood

Steven Wilson

USDC Seafood Inspection Program

Steven.Wilson@noaa.gov

Phone: 301-713-2355, Fax: 301-713-1081

Produce facilities may also select (GAP audit guidelines of field/ranches/harvest crews will be communicated separately):

NSF Davis Fresh Technologies

Ricardo Islas

rislas@nsf.org

Phone: 734.330.6705, Fax: 734.827.7101

Primuslabs.com

Liz Salinas

lsalinas@primuslabs.com

Phone: 805-922-0055, Fax: 805-352-1364

Scientific Certification Systems, Inc.

Heena Patel

hpatel@scscertified.com

Phone: 510-452-8024, Fax: 510-452-8001



2012 Independent Audit Program Guidelines

Import (facilities outside of North America) must select from the following:

AIB

Betsy Blair

bblair@aibonline.org

Phone: 785-537-4750 ext. 206, Fax: 785-537-0106

QMI-SAI Global (GMA-Safe)

Joyce Wiggins

joyce.wiggins@saiglobal.com

Phone: 216-654-0907, Fax: 216-654-0889

NSF Cook & Thurber

Asia

Sutida Ketudut

sutida.k@nsf-cmi.com

Phone: +66 2650 3080

NSF-CMI (GFSI & Cook & Thurber Audits)

United Kingdom, EU, Africa and Middle East

Julie Penny and Jackie Bennett sysco.audits@nsf-cmi.com

Phone: +44 1993 885600

NSF-CMI (GFSI & Cook & Thurber Audits)

India

Jyoti Bhasin

jyoti.bhasin@nsf-cmi.com

Phone: +91 1244 820100

FAI Certification Co., LTD.

Southeast Asia & Asia

Daniel Brooks

Daniel.Brooks@jbtc.com

Phone: 66-2-267-3740-2, Fax: 66-2-267-3743

Chemical facilities must select:

NSF International

Ed Logan

Business Development Manager–Food & Beverage Safety

elogan@nsf.org

Office: 734-827-5624 Fax: 734-827-7124

Non Food facilities must select from the following:

NSF International

Helen Gipple

Account Manager, Food Safety

gipple@nsf.org

Office: 734-827-6845 Fax: 734-827-7779

AIB International

Leslie Ackerman

LAckerman@aibonline.org

Phone: 785-537-4750 ext. 268, Fax: 785-537-0106

Intertek

Asia/Pacific

John Wang

john.wang@intertek.com

Phone: +86 21 609 170 63

Intertek

Europe

Andrea Rodriguez

andrea.rodriguez@intertek.com

Phone: +34-946-113-532

Silliker, Inc.

Europe & North Africa

Ulrich Singer

ulrich.singer@silliker.eu.com

Cell: +33-0-6-88-24-57-49, Fax: +33-1-44-08-55-35

Silliker, Inc.

Australia

Kym Pratt

kym.pratt@silliker.com.au

Phone: +613-8878-3212, Fax: +613-8878-3210

Silliker, Inc.

Asia

Jim Lee

jim.lee@silliker-ap.com

Phone: +86-21-5482-4606, Fax: +86-21 5482-24

Global Food Safety Limited

Kevin Lin (General Manager) Kevin@GFS-China.com

Silliker, Inc.

Todd Dechter

Auditing Account Manager

todd.dechter@silliker.com

Office: 312-938-5151, Fax: 312-729-1320

2012 Independent Audit Program Guidelines

CONTINUOUS RELEASE FORM

The Continuous Release Form authorizes the approved independent auditing agency selected by the supplier, to release the results of the audit directly to Sysco Quality Assurance. All suppliers must electronically agree to the release statement available on the iCiX website.

ALL supplying facilities to Sysco of these types must be compliant:

- ALL Sysco Brand Supplier facilities
- > ALL High Risk Non-branded Supplier facilities (including all facilities for Raw Ground Beef, RTE Fresh Cut Produce, Refrigerated RTE Meat & Poultry Products and RTE Seafood)
- ALL Sourced non-branded supplier facilities

For suppliers submitting an approved auditing agency audit (Standard Audit = "non-GFSI"):

- Approved Sysco brand, approved packer label ground beef, nationally sourced supplier and co-packers is in agreement that each facility approved for processing or packing Sysco products will meet the requirements prescribed in the Sysco Independent Audit Program Guidelines.
- Approved Sysco brand, approved packer label ground beef, nationally sourced supplier and co-packers are required to contact an approved auditing agency of their choice to arrange the required UNANNOUNCED annual audit for each facility processing or packing Sysco product.
- > Approved Sysco brand, approved packer label ground beef, nationally sourced supplier and co-packers authorizes the approved auditing agency of their choice to release audit results to Sysco within 10 business days of the audit being completed.
- > The Continuous Release Agreement remains valid until the approved Sysco brand, approved packer label ground beef, and nationally sourced supplier submits changes and/or corrections via iCiX.

For suppliers submitting a GFSI audit scheme:

- Approved Sysco brand, approved packer label ground beef, nationally sourced supplier and co-packers is in agreement that each facility approved for processing or packing Sysco products will meet the requirements prescribed in the Sysco Independent Audit Program Guidelines.
- Approved Sysco brand, approved packer label ground beef, nationally sourced suppliers and co-packers are required to arrange for the required annual GFSI audit for each facility processing or packing Sysco brand.
- > Approved Sysco brand, approved packer label ground beef, nationally sourced suppliers and co-packers authorizes the GFSI Certification Body to release the critical issues to Sysco within 48 hours of the facility audit being completed. The entire audit will be released upon certification of the facility.
- > The Continuous Release Agreement remains valid until the approved Sysco brand, approved packer label ground beef, nationally sourced suppliers and co-packer submits changes and/or corrections via iCiX.

AUDIT DATES

An audit must be conducted within 13 months of the previously completed audit.

ARRANGING THE AUDIT

- All costs associated with the independent audit and any necessary re-audits are the responsibility of the supplier.
- The supplier is responsible for arranging the independent audit by directly contacting the independent auditing agency/certification body of choice. If the supplier changes their agency selection at any given time, Sysco must be notified immediately via an email to iap@sysco.com with the new auditing agency/ GFSI scheme, current request id, and your iCiX Org id.
- Appropriate facility management (i.e. Facility Manager, General Manager, QA/QC Manager) should accompany the auditor during the facility audit and attend the exit meeting.
- Suppliers selecting a GFSI audit scheme for the first time should be aware that the process may take 3 6 months before the audit is scheduled. Therefore, an auditing agency/certification body should be contacted in the first quarter of 2012.

AUDIT SUBMISSION

Please advise your auditing agency/certification body of the following:

- > All audits must be submitted by the auditing agency/certification body via iCiX.
- Certification Bodies are required to submit interim reports with critical issues to Sysco Quality Assurance via iCiX within 48 hours of completion of the physical inspection of the facility. The full report must be submitted when the certification is issued.
- Auditing agencies are required to submit standard audit critical issues to Sysco Quality Assurance via iCiX within 48 hours of completion of completion of the physical inspection of the facility. The full report must be submitted within 10 business days.

2012 maoponaoni / taait i rogiam oala

SCORING REQUIREMENTS

- Each Sysco brand, approved packer label ground beef, nationally sourced supplier or co-packer is required to achieve an acceptable score from an approved independent auditing agency or certification from a post farm gate GFSI scheme on a 13 month basis.
 - Sysco scoring requirements are independent of the auditing agency scoring structure (i.e. a facility may receive an audit rating of acceptable from the auditing agency but the actual scoring may result in an unacceptable rating from Sysco).
 See the Sysco Score Requirements grid on page 6 for an explanation of the Sysco scoring requirements.
 - A minimum score must be achieved in each product safety section/category and in any other section/category to maintain an acceptable Sysco rating, regardless of the total score. (See scoring grid below for specific requirements).
 This statement does not apply to Chemical or Non-Food/Supplies and Equipment type audits.
 - o In most cases, if a supplier or co-packer does not meet the minimum score requirement or receives an unsatisfactory or unacceptable score in any critical audit category (i.e. metal prevention systems not on line) for a Standard Audit a re-audit may be required within 60 days of the date of the Sysco correspondence. The re-audit must be conducted by the same agency that conducted the unacceptable audit. A Sysco Quality Assurance staff member will review and assess all completed audits and supplier or co-packer will be contacted.
- Failure to comply with the re-audit when directed or scoring below the minimum score on the re-audit may result in disapproval of a supplier or co-packer until the minimum acceptable score is achieved. A Sysco Quality Assurance staff member is required to personally audit any supplier that fails a re-audit. Approval status cannot be reinstated until this Sysco Quality Assurance audit is completed and an acceptable rating is achieved. For suppliers that have undergone a GFSI approved audit scheme, a Sysco Quality Assurance audit must be conducted at any supplier location where the certification is not given or a certification is suspended or withdrawn.
- > Sysco brand, approved packer label ground beef, nationally sourced suppliers and co-packing facilities approved to process or pack Sysco products are required to comply with the requirement for FDA registration if applicable. Proof of said registration is required to be shown to the auditor at the time of the audit.

DOCUMENTATION OF CORRECTIVE ACTION

- Corrective actions for any GFSI audit schemes will be submitted along with the audit if applicable.
- > For all other audit formats, Sysco Quality Assurance will send correspondence to the supplier or co-packer upon receipt of their respective audit results requesting written verification of corrective action by a specific date.
- Corrective action is required to be submitted to Sysco via iCiX within the designated timeframe in order to maintain Sysco approval.

OTHER

- Questions regarding agency specific standards, fees, scheduling, etc., should be addressed directly with the auditing agency.
- Questions regarding iCiX may be directed membersupport@icix.com or 1-877-888-4249 (Option1).
- Questions regarding the Sysco Independent Audit Program requirements may be addressed directly with the Sysco staff member responsible for the product category you are approved to process or pack. Please see Table entitled Sysco Quality Assurance Contacts by Category Responsibility on page 7.

2012 Independent Audit Program Guidelines

The approved auditing agency audit formats that Sysco will accept and the minimum acceptable scores are as follows:

Approved Auditing Agency	Acceptable Format	Total Score (min.) iCiX Executive Summary	Product Safety (min.) iCiX Executive Summary	Other Sections (min.) iCiX Executive Summary
AIB International	Standard Five-Category or IFR with Food Security Addendum	90%	90%	80%
AIB International	Food Contact Packaging Facility Inspection Report	90%	90%	80%
Food Audits International	Food Plant GMP/HACCP/Food Security Checklist	90%	90%	80%
Food Safety Net Services	Food Safety Evaluation	90%	90%	80%
Guelph Food Technology	Total Quality Systems Audit	90%	90%	80%
Intertek [©]	Supplier Best Practice	90%	90%	80%
NSF Cook & Thurber	Food Safety & Quality Audit	90%	90%	80%
NSF Cook & Thurber	Bottled Water Inspection Form	90%	90%	80%
NSF Cook & Thurber	Packaging Facility	90%	90%	80%
NSF Cook & Thurber	Chemical Audit	90%	N/A	80%
Process Management Consulting	Food Safety	90%	90%	80%
Primuslabs.com	Packinghouse, Processing Facility or Cooling/Cold Storage	90%	90%	80%
QMI-SAI Global	GMA-SAFE	90%	90%	80%
Randolph Associates, Inc.	Food Safety Systems & Sanitation; GMA-SAFE	90%	90%	80%
Scientific Certification	Packing Facility, Fresh-Cut Processing, Processing Facility, Cooling and Cold Storage Practices	90%	90%	80%
Silliker, Inc.	GMP/Food Safety Audit	90%	90%	80%
Silliker, Inc.	Food & Non Food Packaging Materials Audit	90%	90%	80%
USDA	Plant Systems Audit	90%	90%	80%
USDC	Seafood Plant Audit	90%	90%	80%
USDA – Shell Egg Plants	Shell Egg Plant Systems Audit	90%	90%	80%
USDA – Produce	Good Agricultural & Good Handling Practices (GAP/GHP) Audit	90%	90%	80%