



Food Safety

US Foods Director of Security, together with the Food Safety and Quality Assurance Department and Division Management establish companywide policies and procedures. The procedures are enhanced to include elements unique to each distribution center.

US Foods takes food safety very seriously. We practice safe handling, storage, and transportation of all products we distribute. Our Food Safety and Quality Assurance Department monitors the implementation of US Foods food safety policies and procedures (SOPs) that conform to the FDA requirements set forth in the Code of Federal Regulations (CFR) Title 21, Sections 110 & 123. All distribution center warehouse employees and drivers receive in-depth food safety training when hired and then again annually.

USF voluntarily contracts with National Sanitation Foundation (NSF), a well-respected global auditing firm, to perform inspections at each of our facilities. This past year our facilities averaged scores greater than 95%. We also have over 60 divisions that have obtained IFS Certification with the final few USF divisions working to obtain the IFS Certification. In compliance with FDA-HACCP regulations, all US Foods divisions have HACCP plans in place. Every division is required to have at least two HACCP-trained professionals on staff. Temperatures are recorded and maintained properly for all refrigerated and frozen products throughout the distribution process.

USF requires Exclusive Brand manufacturers and all other manufacturers mandated by law to have a HACCP program and to submit a letter of compliance to USF annually. In addition, we require that all packers of products bearing our label to be GFSI certified.

US Foods facilities are registered with the FDA to maintain compliance with the FDA's Bioterrorism Act, which requires the registration of each facility and the establishment, maintenance and reporting of records to identify the immediate previous source and immediate subsequent recipient for all food products. Security of our facilities, trucks, and personnel is strictly maintained and periodically re-evaluated.

Every truck in the US Foods fleet is cleaned nightly and temperatures are monitored throughout the delivery process. As the existing fleet ages, it is upgraded to the most modern equipment available in the industry.

Protecting the health and safety of our customers and their customers is the highest importance for all of us at US Foods. For additional information, please visit our web site at www.usfoods.com.





US Foods believes that food defense, like food safety, is best managed from farm to fork. As such, we have already implemented food protection practices that meet or exceed the FDA's guidance in our distribution centers.

For obvious reasons our specific security measures at US Foods must remain proprietary and confidential. However, by implementing a team approach that includes all areas of our company, our focus remains on protecting our people, property and product. Our current HACCP and Food Defense Teams consist of the below personnel.

HACCP & Food Defense Teams

HACCP Coordinator

Denise Fowlin-Mignott

Food Defense Coordinator

Paul Dupre

HACCP Team Members

Don Pham
Bill Blinstrub
Devon Edwards
Scott Warner
Darius LeGree
Guante Upshaw

Food Defense Team Members

Marty Ross
Bill Blinstrub
Brent Houser
Krisoula Katsoudas
Scott Warner
Devon Edwards





Allergen Control Program

US Foods transports, receives, stores and delivers many tens of thousands of cases and packages of products containing one or more of the 8 main allergens defined by the US Food and Drug Administration (FDA). Unlike food processors, or food service establishments, we do not process, mix, cook, prepare and/or expose foods therefore our policy does not require processor-type allergen controls.

US Foods has performed a risk assessment on the transportation of allergens as part of our HACCP Program per the Code of Federal Regulations (CFR) Title 21, Sections 110 and 123. While US Foods has current sales in excess of \$20 billion a year, we are not aware of one incident of allergic response as a result of our receiving, storage and shipping procedures. Our HACCP (risk) assessment has shown no hazard "reasonably likely to occur" as products are fully labeled by law and nearly all are shipped in sealed cases.

During storage, refrigerated foods in our coolers are arranged and stored to separate certain raw foods (poultry, meat, seafood, etc) from each other and from ready-to-eat foods (poultry, meat, seafood, produce, etc). They are arranged and positioned in the "pick path" so that orders can be properly palletized by weight and type. There is no separation of raw foods from ready-to-eat foods in our freezer and dry storage area. Products are not separated by allergen because 1) there is no hazard "reasonably likely to occur" and 2) the myriad combinations of allergens in products would make separation unrealistic in the warehouse and later in transport vehicles.

While a limited number of raw, whole produce products have openings that allow the living fruits or vegetables to "breathe", nearly all of these have rinds, peels or other coverings, and/or require washing before use for food safety.

Any questions or comments related to this Allergen Program/Policy Statement should be directed to the US Foods, Director, Distribution-Food Safety and Quality Assurance (FSQA) Department, 6133 North River Road, Suite 300, Rosemont, IL 60007 or through one of our distribution centers.



HACCP

Each US Foods Distribution Center has a HACCP plan that meets the requirements of the Code of Federal Regulations (CFR) Title 21, Sections 110 & 123. Hazard analyses have been conducted per Federal requirements. All HACCP plans consist of written flow charts, hazard analysis worksheets, and HACCP plan forms, per FDA, USDA and/or Codex standards. Critical control points are in place for items that require them.

The HACCP Plan is managed by an on-site HACCP coordinator at each Distribution Center. A HACCP coordinator is a person who is certified in an Association of Food and Drug Officials (AFDO) approved course and instructor. Each Distribution Center has at least two HACCP trained staff members. The HACCP Coordinator acts as the day to day manager of the HACCP plan and is responsible for the review and approval of all HACCP forms and documents, HACCP training of employees, approves any corrective actions and ensures that the HACCP plan is up to date. Records are monitored daily and reviewed at least weekly. All refrigerated HACCP records are kept on file for at least one year and all frozen records for at least two years. All HACCP plans are required to be updated yearly or when changes are made. All thermometers that are used for monitoring temperature are calibrated at least monthly or to the recommendation of the manufacturer. Records are kept on file and reviewed by the HACCP Coordinator.

All warehouse staff members are required to take annual training in food safety and HACCP provided by the company; new associates are trained when hired.

Standard Operating Procedures and Standard Sanitation Operating Procedures have been implemented to support the HACCP plan. US Foods Corporate Food Safety staff monitor the implementation of these policies and procedures.

Summary of HACCP Plan Types:

Type A- Dry storage with no CCPs.

- Anchovies
- Nonperishable seafood
- General Dry Product Storage

Type B- Refrigerated with no CCPs

- Non-histamine seafood
- Refrigerated processed scallops
- Non-pasteurized shell eggs
- Non-processed pasteurized dairy products
- General Refrigerated Product Storage



Type C- Refrigerated with CCPs

- C1 Refrigerated seafood with transit times greater than 4 hours** received with cooling media other than ice and the product is below or at 40F OR the product is surrounded by ice OR there is a time/temperature recording device showing that the product has been maintained at 40F AND there may be harvest information in compliance with state regulations AND the product is stored at 40F or less. Hazards could include pathogenic bacteria and/or naturally occurring toxins and/or environmental chemicals.
- C2 Refrigerated seafood with transit times less than 4 hours** AND the product temperature at receipt is 40F or less AND there may be harvest information in compliance with state regulations AND the product is stored at 40F or less. Hazards could include pathogenic bacteria and/or naturally occurring toxins and/or environmental chemicals.
- C3 Refrigerated live molluscan shell fish with transit times greater than 4 hours** AND received with cooling media other than ice and the product is below or at 45F or less OR the product is surrounded by ice OR there is a time/temperature recording device showing that the product has been maintained at 45F AND harvest information in compliance with state regulations. Hazards could include pathogenic bacteria and/or naturally occurring toxins and/or environmental chemicals.
- C4 Refrigerated live molluscan shell fish with transit times less than 4 hours** AND the product temperature at receipt is 45F or less AND there may be harvest information in compliance with state regulations AND the product is stored at 45F or less. Hazards could include pathogenic bacteria and/or naturally occurring toxins and/or environmental chemicals.
- C5 Refrigerated smoked seafood with transit times more or less than 4 hours** and there is a time/temperature recording device showing that the product has been maintained at 38°F during transit to the division and that the product is stored at 38°F or less. Hazards could include pathogenic bacteria and toxin formation. This plan is for divisions whose state requires a critical limit of 38°F or less for items such as pasteurized refrigerated crabmeat and refrigerated smoked salmon in reduced oxygen packaging.

Type D- Frozen with no CCPs

Non-raw shellfish and other seafood raw or processed
General Frozen Product Storage



Type E- Frozen with CCP

Frozen raw whole, half shell or shucked Shellfish with harvest information in compliance with state regulations. Hazards could include naturally occurring toxins and/or environmental chemicals.

Preventive Controls:

The fundamental components of the preventive Controls plan are:

- ✓ **GMPs/SOPs/SSOPs** – our policies and procedures are analyzed and upgraded monthly by a standing committee of experts in HACCP, food safety, operations, food law, and regulatory compliance.
- ✓ **Food Safety Plans** – Each facility handling or processing food is required to have a comprehensive plan that addresses all hazards that are reasonably foreseeable. While this requirement will not be in effect for at least another year, US Foods has begun the analysis necessary to have an effective, comprehensive plan.
- ✓ **Qualified Individuals** –US Foods has at least two HACCP-certified individuals in every distribution center.

Supplier Verification-US Foods requires every supplier of any of our exclusive branded products to have its food safety and quality systems certified against a Global Food Safety Initiative recognized standard (GFSI).





OSHA

US Foods complies with all applicable OSHA regulations and performs annual training classes in accordance with regulatory requirements. US Foods confidentiality policies prohibit publishing details of our training programs; however, additional information is available on request, on site.



K12 Leaders - Florida/Georgia
Atlanta, Port Orange, South Florida, Tampa



Traceability

US Foods is committed to traceability and has worked for years to set the standards on traceability by actively working with industry leadership on initiatives, as described below. Further, US Foods is following the Food and Drug Administration's (FDA) steps towards the implementation of the traceability requirements under the new Food Safety Modernization Act (FSMA) and is committed to meet or exceed their regulatory requirements.

The Produce Traceability Initiative (PTI) is sponsored by the Canadian Produce Marketing Association, GS1 US, Produce Marketing Association and United Fresh Produce Association. The PTI is designed to help the industry maximize the effectiveness of current trace back procedures, while developing a standardized industry approach to enhance the speed and efficiency of traceability systems for the future. US Foods has been a founding member of the GS1 Produce Traceability Initiative, has sat on the steering committee (see http://www.producetraceability.org/endorse_pti/index.cfm), and is set to meet all the PTI established goals and timelines.

The Foodservice GS1 US Standards Initiative seeks to facilitate GS1 Standards adoption in an effort to make the industry's value chain more visible, secure, and sustainable with complete and accurate data. US Foods as a founding member of the GS1 Produce Traceability Initiative sat on the steering committee (see http://www.gs1us.org/sectors/foodservice/foodservice_initiative_members) and are on plan to meet all the initiative's established goals and timelines.

US Foods actively applies traceability through activities like product recalls, product withdrawals and product holds. Through a one-step up and one-step down process US Foods can trace through records the source of a particular product (SKU) and the customers who received that product. During a recall, the vendor informs US Foods of the recall and distribution centers impacted, then a computer-based e-mail and call system notifies all customers who may have received the product. The impacted distribution centers confirm with the customers, pick-up the recalled product, and provide replacement product, as necessary. This process meets or exceeds all current regulatory requirements and industry standards.





US Foods Customer Satisfaction Guarantee

If you are not satisfied with the as-delivered condition of your US Foods order, we want to make it right. Please contact your sales representative or your driver so we can arrange for a return and credit your account. Please refer to our Return and Credit Policy for Details:

Returns: With some limited exceptions as outlined below, products that are delivered by US Foods may be returned if they are rejected at the time of delivery or if the customer notifies US Foods within twenty-four (24) hours of delivery. Delivered products with concealed damage, non-food products or products that are not delivered by US Foods, may be reported and returned for up to thirty (30) days. Unless damaged or out-of-code, to qualify for credit or refund, products must be properly stored and handled in accordance with good handling practices per Federal/State regulation, including being held at the required temperature to maintain food safety and quality, and in acceptable condition to re-sell. Ice cream and ice cream novelty products are subject to quality inspection. If products are not returned, to qualify for credit or refund, prior written authorization from US Foods must be obtained prior to disposal.

Credits: Upon confirmation of the reason for return, a credit or refund will be issued for returned non-RRE (Refrigerated Ready to Eat*) products that are: damaged or out-of-code upon delivery; substitute items not approved by the customer; products shown on invoice but not actually delivered; or unwanted items returned unopened in their original packaging and in a saleable condition.

Refrigerated Ready to Eat: US Foods is the industry leader in safe food handling and storage practices. Because of food safety concerns, special restrictions are placed on the return of products designated by US Foods Food Safety & Quality Assurance as "(Refrigerated) Ready to Eat (RRE or RE)" products. Refer to separate guideline for more detail about RRE products. Return and credit for RRE products will be honored only if products are unopened, in their original packaging and rejected at the time of delivery.

(*RRE/RE products are refrigerated foods that do not require cooking or other food safety process prior to consumption and are of the highest risk).

Non-Stock Items: Products not regularly stocked by US Foods (e.g. customer-labeled, special order or made-to-order products) may not be returned unless they are damaged or out-of-code upon delivery and the customer notifies US Foods within twenty-four (24) hours, provided the non-stock items are properly stored and handled in accordance with good manufacturing practices. Non-stock items with concealed damage may be reported and returned for up to thirty (30) days.





Note: For special events (weekends or week-long sporting events, festivals and other events, please see the Special Events addendum as these require special procedures and a separate event agreement.

Note: To ensure proper handling and credit of returns, contact your local US Foods division, or US Foods Culinary Equipment and Supplies, 800-328-9400, cust_support@usfoods.com. Products that are returned for convenience may be assessed a twenty-five percent (25%) restocking fee.

