Food Defense Supplier Guidelines

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Introduction

Suppliers acting on behalf of Mondelēz International who manufacture, process, pack, or in any way handle ingredients or final products need to develop specific procedures to secure Mondelēz International's products, 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, suppliers will ensure their suppliers adopt similar protocols and implement appropriate controls. At Mondelēz International, we call these efforts "Food Defense" and we depend on our suppliers to do their part in helping us secure our combined portion of the world's food chain.

The laws and government expectations regarding Food Defense vary from country to country. Food manufacturers 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 are less prescriptive. Mondelēz International has defined a minimum set of Food Defense standards to help us meet legal and consumer expectations. The standards may exceed the requirements of a specific country or area.

This document will help suppliers understand Mondelēz International' expectations and provides guidance on how to achieve our standards. You can also learn more about our Food Defense program at C-15 Food Safety, Food Defense and Regulatory or if you are a Mondelēz International partner, by contacting your procurement manager.

1. Program Administration

a. Plan management

Sites need to create a plan to explain how it will accomplish its Food Defense objectives. At a minimum, the plan will include details such as:
- Who is responsible for the program and maintaining it?
- What are the specific components of the program (e.g., access control, shipping & receiving procedures, etc.
- How the site will access its ability to accomplish the plan?

It's important to consider that effective programs are:

- **Developed:** Written documents plans and procedures help everyone understand the individual site's program.
- **Implemented:** This means that written plans and procedures are actually in place and actively used as intended.
- **Assessed:** Focusing on the plans and procedures and assessing the site's iimplementation of the plan will show any gaps that need to be fixed.
- **Maintained:** The facility can maintain its program by actually fixing gaps identified in assessments and modifying the plans and programs as conditions change.

b. Site Security Team or Program Manager

Each site needs to identify the employee(s) primarily responsible for managing the facility's food defense program (i.e., self-assessment, reporting procedures, access control measures, etc.). This employee's roles and responsibilities should be clearly defined and documented.

c. Reporting Procedures

Should your site become aware of a potential tampering matter, you need to have detailed specific steps for reporting this to Mondelēz International and local officials (as required by law). Our ability to respond quickly to a potential tampering incident can help minimize and contain the damage. As part of the Food Defense program planning, you need to define these steps and understand who needs to be contacted.

d. Self-Assessments

Self-Assessments should be conducted periodically, at least annually. The main objectives of the self-assessment are to:

Identify the most vulnerable components of the site's operations and, determine how to use resources, procedures and protocols most effectively to reduce risks.

During the self-assessment, sites can identify potential areas of exposure, or "gaps" in the site's security measures. Once the gaps are identified, countermeasures (such as program or process improvements or physical security hardware upgrades) can be used to bridge or fix the gaps.

A sample Self-Assessment can be found in Appendix 1 of this document.

2. Access Control

Effective access control is the foundation of a successful Food Defense program. Some access control measures include:
- Automated access control systems
- Identification badges, ID cards, and visitor passes
- Property and material passes
- Key control procedures
- Vehicle control procedures
- Delivery procedures
- Security guards

An access control program should positively identify and document all individuals gaining access to the facility, limit access to those who have a legitimate reason to be there, control pedestrian and vehicle traffic at the site and properly report and respond to incidents challenging this policy. A good program will deter people, intent on harming our products, from gaining access to your site. Areas that require specific access control measures include:

- Processing and manufacturing areas
- Ingredient and raw material storage areas (to include packaging stocks)
- Hazardous and chemical storage areas
- Shipping and receiving areas

3. Background Screening

Mondelēz International' background screening policy states that suppliers who can demonstrate their ability to carry out effective screening measures will be preferred over those who cannot. In accordance with local laws, Mondelēz International expects our third party partners to carry out a reasonable level of reference checking and preferably including the following:

Reference checks: Comprehensive reference checks should be carried out with previous employers (prior 2 employers). This should include validation of employment dates and compensation details in addition to qualitative information.

Qualifications checks: All listed educational qualifications, including degrees, diplomas or certificates will be independently checked for white-collar employees.

Employment Dates: Where these have not been validated by the reference checks, they need to be separately or independently validated. Gaps in employment should be thoroughly investigated.

Criminal Checks: Criminal records should be independently checked as the final step of the employment selection process. If it is not legally possible to obtain access to criminal records, a Certificate of Good Conduct from the police department or court jurisdiction will be pursued where this is available.

Credit Checks: Credit checks will be conducted for specific roles that, by their nature, provide easy access to the funds of the Company or its employees, i.e., certain Finance/Payroll/HR/Senior management positions.

Driving Records: For those positions involved with driving automobiles, trucks, tractors, forklifts, etc, a driver record check will be conducted.

4. Shipping and Receiving

Suppliers need to take deliberate steps, and implement procedures to monitor and verify the integrity of incoming and outgoing shipments.

Some measures to consider include:

- Requiring all drivers to check in prior to offloading to verify shipping documentation and driver's identity.
- A system to recognize and report discrepancies in finished products, raw materials, packaging/labels and chemical materials.
- Pre-notification and scheduling of all shipments and empty trailers. "Holding" shipments that have not been pre-scheduled at a predetermined location until the load can be verified.
- Inspection of incoming shipments for damage and signs of tampering. Requiring all doors and hatches on incoming shipments to be sealed with a numbered seal that corresponds with a seal number on the accompanying shipping documentation. Sealing outgoing shipments and annotating the seal number on accompanying documents.
- Locking or sealing empty or semi-filled trailers/containers (either docked or on site grounds for intermittent unloading) during non-business hours.

5. US Requirements

As mentioned in the introduction, food manufacturers and handlers that operate in the United States or that ship into the United States have the most stringent requirements in the world. Click on the following links to learn more about the US Food and Drug Administration (FDA) requirements:

- Registration of Food Facilities
  Information on the requirement that owners, operators, or agents in charge of domestic or foreign facilities that manufacture, process, pack, or hold food for consumption in the United States must register with FDA.
- Administrative Detention
  Information about FDA's authority to order the administrative detention of human or animal food.
- Establishment & Maintenance of Records
  Information on the requirements for establishment, maintenance, and availability of records by persons, who manufacture, process, packs, transport, distribute, receive, hold, or import food into the United States.
- Prior Notice of Imported Foods
  Information on the requirement that FDA receive prior notice before food is imported or offered for import into the United States.

Appendix 1: Self-Assessment Template

Reviewed by:	
Date:	
Version:	

Plan Management and Exercise - ALL FACILITIES	Yes	No	N/A
Are a designated site security team and Food Defense Coordinator appointed to implement and oversee the Security and Food Defense plan?			
Are annual Security and Food Defense self-assessments conducted?			
Does the facility quarterly assess the security of its overall posture through the performance of a self-inspection of Physical security systems and effectiveness of security procedures and protocols?			
Is the site security and food defense plan reviewed (and revised if necessary) at a minimum annually?			
Is the site security and food defense plan treated as proprietary company information?			
Are key emergency contact information for local fire, law enforcement and ambulance maintained in the plan?			
Is the above contact information reviewed and updated annually?			
Are evacuation procedures in the defense plan?			
Are procedures in place to control access during an emergency to authorized personnel only?			
Are periodic drills conducted on the operational elements of the security plan?			
Food Defense Planning Considerations - Warehouses, Plants, and Sites that handle food			
Is key emergency contact information for public health regulators included in the plan?			
Is there an established liaison between the site and public health officials and appropriate security officials and other law Enforcement officials?			
Is there an established relationship between the facility and the appropriate analytical laboratories for possible assistance in investigation of product tampering cases?			
Are procedures for responding to threats of product tampering included in the plan?			
Are procedures for responding to actual incidents of product tampering detailed in the plan?			
Are employees encouraged to report signs of possible product tampering?			
Does the facility have a documented recall plan?			
Are procedures in the recall plan reviewed and updated as necessary?			
Physical and Procedural Security – ALL FACILITIES	Yes	No	N/A
Are the grounds groomed and well maintained with clear lines of sight?			
Are the facility's exterior areas monitored for signs of suspicious activity or entry (e.g., by guard or CCTV [Closed Circuit TV])?			
Is there sufficient outside lighting to allow detection of unusual activities on any part of the establishment outside premises during non-daylight hours?			
Do emergency exits have self-locking doors and/or alarms?			
Are all non-employees (e.g., outside vendors, contractors or similar visitors) registered upon entry?			
Is positive identification (government issued photo identification) required for outside vendors and delivery personnel, contractors, or similar types of visitors to verify identity when granting access to the facility?			
Are the following secured with locks, seals, or sensors at all times to prevent entry by unauthorized persons?			
Outside doors and gates			
Windows			
Roof Openings			
Vents			
Trailers, railcars, containers, etc.			
Utility controls			
Storage areas			
Is there emergency lighting within the facility?			
Is active surveillance of the inside facility and operations maintained through CCTV (Closed Circuit TV)?			
Are emergency systems tested periodically?			
Are the locations of controls for emergency systems clearly marked?			
Is access to sensitive storage, manufacturing, etc. areas restricted and access controlled to prevent entry by unauthorized personnel?			

Appendix 1: Self-Assessment Template

Are visitors, guests, and other non-establishment employees (e.g., contractors, salespeople, truck drivers) restricted to non-production and storage areas unless accompanied by an authorized employee?			
Are evacuation routes posted?			
Are procedures in place to routinely check toilets, maintenance closets, personal lockers, and storage areas for concealed people or packages?			
Is a regular inventory of facility keys conducted?			
Are the central controls for the following restricted (e.g., by locked door/gate or limiting access to designated employees) to prevent access by unauthorized persons?			
Heating, Ventilation and A/C systems			
Propane Gas			
Water Systems			
Electricity			
Disinfection systems			
Personnel Security Procedures - ALL FACILITIES	Yes	No	N/A
Are background checks conducted on prospective employees prior to hiring?			
Are background checks required on contract employees?			
Do employees receive training on security procedures as part of their orientation training?			
Are procedures in place to ensure positive identification/recognition of all employees?			
Are identification procedures in place to ensure the positive identification/recognition for temporary employees and contractors (including construction workers, cleaning crews, and truck drivers) in the facility?			
Are procedures in place to screen employees entering the establishment during business hours and non-business hours?			
Are procedures in place to screen the entry of contractors into the establishment during business hours and non-business hours?			
Is access to sensitive areas of the facility denied to those individuals performing work functions, such as temporary employees, construction workers, cleaning crews, truck drivers, and contractors?			
Are procedures in place to ensure clear identification of personnel with their specific functions?			
Does the facility have a policy regarding items (cameras etc.) that employees or visitors may be bring into the facility?			
Is a policy in place on what personal items may and may not be allowed inside production, warehouse and food storage areas?			
If employees are provided with lockers for personal items, are announced and unannounced inspections of employees' lockers conducted (within the limits of local law)?			
Are employees instructed on the proper protocol for handling and reporting tampering, illness, or other threats?			
Food Production – Plants and Sites that Handle Food	Yes	No	N/A
Is access to product production and preparation areas limited to employees, escorted visitors, and regulatory inspection personnel only?			
Is the mixing and batching of product and ingredients and other operations where large amounts of exposed product are handled continuously monitored?			
Are lines that handle and transfer products, water, oil, or other ingredients monitored to ensure integrity?			
Is the packaging integrity of ingredients examined for evidence of tampering before use?			
Are records maintained to ensure the capability to trace-back raw materials to suppliers?			
Are records maintained to ensure the capability to trace-forward finished products to vendors?			

Storage Security - Warehouses, Plants, and Sites that handle food	Yes	No	N/A
Is access to raw product storage areas, including holding coolers restricted (e.g., by locked door/gate) to designated employees?			
Is an access log maintained for raw product storage areas?			
Is access to ingredient storage areas restricted to designated employees only?			
Is an access log maintained for ingredient storage areas?			
Is access to finished product storage areas restricted to designated employees?			
Is access to external storage facilities restricted to designated employees only?			
Are periodic security inspections of storage facilities and warehouses (including temporary storage vehicles) conducted?			

Appendix 1: Self-Assessment Template

Are records maintained on facility security inspections results?			
Are product labels and packaging held in a secure area to prevent theft and misuse?			
Is the inventory of finished products regularly checked for unexplained additions and withdrawals from existing stock?			
Is the access to inside and outside storage areas for hazardous materials/chemicals such as pesticides, industrial chemicals, cleaning materials, sanitizers, and disinfectants restricted to designated employees?			
Are hazardous material/chemical storage areas separated from production areas of establishment?			
Is a monthly inventory of hazardous materials/chemicals maintained?			
Are discrepancies in the inventory of hazardous materials/chemicals immediately investigated?			
Are the storage areas for hazardous materials/chemicals separated from stock, storage or production/preparation areas?			
Is a procedure in place to receive and securely store hazardous chemicals?			
Is a procedure in place to control disposition of hazardous chemicals?			
Is access to incoming water lines and water wells restricted? (e.g., by locked door/gate or limiting access to designated employees)			
Is access to storage tanks for potable water restricted?			
Are potable water lines periodically inspected for possible tampering?			
Laboratories – Sites with laboratories will complete this section.	Yes	No	N/A
Is access to laboratories restricted (e.g., by locked door) to designated employees?			
Is an access log maintained for laboratories?			
Are periodic security inspections of laboratories conducted?			
Are records maintained on security inspections results?			
Is the inventory of controlled reagents regularly checked for unexplained additions and withdrawals from existing stock?			
Are procedures for reporting to incidents of missing reagents reviewed annually and updated as required?			
Shipping and Receiving - Warehouses, Plants, and Sites that handle food	Yes	No	N/A
Are trailers on the premises maintained under lock and/or seal when not being loaded or unloaded?			
Are deliveries monitored and controlled by the shipping and receiving personnel?			
Are outgoing shipments of product sealed with tamper-evident seals?			
Are the seal numbers on outgoing shipments documented on the shipping documents?			
Are incoming delivery trucks inspected for unusual cargo or activity?			
Are drivers' identities and credentials verified against a valid government-issued driver's license?			
Is there a staging of incoming deliveries prior to entry into the facility?			
Are vendors of packaging materials and labels selected with consideration of food defense measures implemented by vendors?			
Is access to loading docks controlled to avoid unverified or unauthorized deliveries?			
Is advance notification from suppliers (by phone, e-mail, or fax) required for all incoming deliveries?			
Are suspicious alterations in the shipping documents immediately investigated?			
Are all deliveries verified against the roster of scheduled deliveries?			
Are unscheduled deliveries held outside facility premises pending verification?			
Are off-hour deliveries accepted?			
If off-hour deliveries are accepted, is prior notice of the delivery required?			
If off-hour deliveries are accepted, is the presence of authorized individual to verify and receive the delivery required?			
Is the integrity of internal compartments in the trailer, lot packaging, or in-transit security checks for less-than-truckload (LTL) or partial load shipments of materials verified?			
Is the integrity of incoming shipments of raw product, ingredients, and finished products checked at receiving dock for evidence of tampering?			

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