

QUALITY ASSURANCE

Sysco Food Safety and Quality Programs



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THE SYSCO FOOD SAFETY PLEDGE

#1

Sysco is the global leader in selling, marketing and distributing food products to restaurants, healthcare and educational facilities, lodging establishments and other customers who prepare meals away from home.

The Sysco Vision is to be our customers' most valued and trusted business partner. Fundamental to achieving that vision is our complete commitment to provide safe, quality-assured products to our customers.

Food safety is our No. 1 priority, and it cannot be compromised.

Our commitment to continuously improving our food-safety and quality-assurance practices can be traced back to the founding of Sysco Corporation. Since 1970, we have continued to build upon our founders' beliefs in first-rate quality and food-safety programs, as well as the safety of our people on the job. Today, our commitment has never been stronger.

Our Sysco Quality Assurance team is responsible for ensuring we meet today's food safety and quality challenges. We accomplish this through the diligent efforts of our full-time Quality Assurance team members and supportive quality experts located throughout the world.

We are actively involved in leading quality, food safety, regulatory and environmental initiatives. Sysco sponsors food safety and sustainability research, while team members serve on numerous advisory committees and participate in various food safety, regulatory, quality and environmental initiatives. We are committed to the belief that shared knowledge



leads to continuous improvement in these areas and ultimately benefits all stakeholders in the foodservice industry, including consumers, our valued customers, our supply partners and our competitors.

DISTRIBUTION FOOD SAFETY



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The Sysco Approach

Sysco's approach to food safety aligns with the mission and vision of our company:

Mission

To market and deliver great products to our customers with exceptional service.

Vision

To be our customer's most valued and trusted business partner.

These constructs all require a best in class food safety system. Sysco has implemented a comprehensive supply chain food safety system covering transportation from the supplier through to delivery to the end-customer.

Key components of the food safety system involve

- 1) sourcing from capable suppliers who pass an approved 3rd party Food Safety audit,
- 2) eliminating the possibility of cross-contamination during storage and transport, and
- 3) establishing time and temperature control limits from the time products leave the supplier to the time they are delivered to the end-customer.

Sysco Standard Operating Procedures (SOPs) cover all areas of food handling and transport, and function as the foundation for training programs focused on preventive controls and a food safety culture designed to ensure the safety of the food distributed by Sysco is maintained.

Distribution Food Safety (DFS)

To assure compliance with Sysco's DFS systems in our Broadline Sysco Operating Companies (OpCos), Food Safety Program Managers (FSPM) will be employed at the local companies. These FSPMs will report directly to Sysco Corporate Food Safety Regional Directors with a dotted line to the company President.

The FSPMs in the companies partner with other functions to ensure food safety tasks are performed appropriately (operations, merchandising, transportations, sales, etc.).

Corporate Food Safety Regional Directors will manage the FSPMs in the U.S. and Canada.

Sysco QA Initial Facility and Temperature Controls

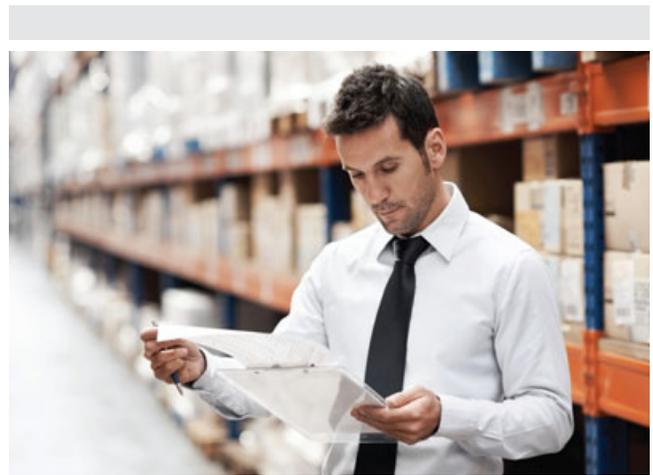
The temperature of many Sysco branded products, as well as a growing number of non-branded food products are monitored during transit.

The information is used to continuously improve supply chain temperatures, as well as ensure that transit temperatures maintain food safety prior to

DISTRIBUTION FOOD SAFETY

Sysco receiving the product. No refrigerated products are received by Sysco without thorough evaluation. Prior to Sysco receiving products from a supplier and placing it in inventory, the receiver checks the product temperature and evaluates the load to ensure it was handled properly.

The process for product flow from receiving, through storage, and loading onto delivery trucks is engineered to maintain product temperature as close to ideal as possible to maximize food safety and quality. Once on delivery trucks, temperature is maintained by a fleet of multi compartment refrigerated trailers. Drivers monitor temperature throughout the delivery to ensure food safety and product quality are maintained. We do not permit the use of drop sites to temporarily store food before it's delivered to customers. The food safety system at Sysco is designed to exceed regulatory requirements, as well as our customers' expectations.



At Sysco, we know maintaining food safety in the cold supply chain ensures we market great products with exceptional service, which earns our customer's trust. We do not permit the use of dropsites to temporarily store food before it's delivered to customers.



SUPPLIER APPROVAL



Manufacturers must pass a rigorous quality and food safety assessment before becoming Sysco suppliers.

Initial Facility Audit (IFA)

Potential supplier facilities from all product categories must pass an Initial Facility Audit (IFA) performed by a Sysco Quality Assurance team member.

Suppliers must demonstrate the capability of producing food products to our requirements.

Facilities are not allowed to produce under the Sysco Brand without first passing a rigorous process of quality, food safety audit and product evaluations. Suppliers must demonstrate the capability of producing food products to our requirements. If the product evaluations and business analysis warrant proceeding through the approval process, a representative of Sysco Quality Assurance will conduct a comprehensive “desktop” pre-audit teleconference with the facility management personnel in order to determine if the facility will meet our food safety and quality expectations.

If Sysco Quality Assurance obtains facts to support the facility is capable of meeting the requirements, upon completion of the teleconference, an initial “On-Site” audit of the facility shall be scheduled. The initial audit will verify, by physical inspection, the acceptability of the plant and grounds as well as validation of the food safety and quality assurance programs in place.



If approval of the facility is granted, the supplier and the Sysco Program Quality Manager will establish monitoring and verification procedures to ensure that the food safety and quality systems are maintained and the Sysco products are manufactured or packed according to the agreed specifications. The IFA requirement applies to all potential Sysco Brand manufacturers.

SUPPLIER APPROVAL



Specialized supplier requirement program to provide safe and wholesome products



Sysco Quality Assurance professionals visit Sysco Brand suppliers on a routine basis



Compliance with FDA, USDA and CFIA regulations, FSIS Directives and Industry Best Practices

Ground Beef and Veal Supplier Authorization

To mitigate the risk of *E. coli* O157:H7 in raw ground beef and veal products distributed through Sysco Operating Companies and/or Sysco Specialty Meat Companies, Sysco has developed a specialized supplier requirement program.

Sysco has been very proactive in establishing food safety programs that provide our customers with safe and wholesome products. When purchasing Raw Ground Products, Corporate QA, with the support of the SMS Beef Department and Operating Companies, has implemented enhanced food safety control requirements that exceed minimum regulatory requirements.

The product and process requirements are reviewed and updated as needed to improve Sysco's ability to provide safe food and to affirm compliance with USDA/CFIA

Regulations, FSIS Directives and/or Notices and Industry Best Practices. The purpose of this process is to achieve a greater level of consistency between products and suppliers of this important product category.

Compliance with Sysco's Ground Beef Food Safety Program must be verified annually by an approved *E. coli* O157:H7 audit developed specifically for "Grinders." Any establishment identified as not complying with the Sysco requirements will be disqualified from the Sysco Brand/Packer Label authorized supplier list and purchases of Raw Ground Products produced at such establishment(s) shall be suspended until compliance is achieved.

Sysco's QA personnel visit Sysco Brand raw ground beef and veal suppliers on a routine basis.

If suppliers are not on the authorized list, then they cannot distribute through any Sysco Operating Company, including Broadline, "Quick Service" or Specialty Meat companies. In addition, Sysco's QA personnel visit Sysco Brand raw ground beef and veal suppliers on a regular basis, and our Operations Review Department conducts audits at Sysco Operating Companies to assure that purchases are limited to authorized suppliers only.



SUPPLIER APPROVAL



The SSMC Supplier Approval Program requirements include a rigorous set of food safety standards including an annual Independent Food Safety Audit (IFSA).

Sysco Specialty Meat Company (SSMC) Raw Materials Supplier Approval

To reduce risk of the potential for introduction of pathogenic *E. coli* O157:H7 into whole muscle non-intact beef cuts, SSMCs only purchase raw materials from approved suppliers that have confirmed compliance to the Raw Materials Supplier Approval Program.

The SSMC Supplier Approval Program requirements include a rigorous set of food safety standards. These include:

- Annual Independent Food Safety Audit (IFSA) for all covered establishments.
- Annual *E. coli* O157:H7 assessment portion or addendum to the IFSA audit
- Ongoing Food Safety System Letter of Guarantee including verification and validation details of at least two hazard control point interventions.

Sysco QA compiles program requirements on an on-going basis and posts the information via an electronic archive.

Sysco Corporation and the SSMC monitor compliance on an ongoing basis. In the event a supplier or supplier location fails to comply, they will be removed from the SSMC Approved Supplier List, and product shipments from those suppliers or individual supplier locations will not be allowed to be received into inventory at SSMC establishments and may not be used for Whole Muscle Non-Intact (WMNI) beef production.



FOOD SAFETY

Supplier Facility Risk Rating System and Plant Visit Matrix

Sysco Quality Assurance has developed a Supplier Facility Risk Rating system and Plant Visit Matrix to manage internal, second party Sysco QA Plant Visits to supplier facilities approved to manufacture Sysco brand products. Facility risk ratings are based on numerous factors including but not limited to: the products with the most inherent food safety risk produced at each facility, the robustness and validity of the food safety processes in each facility, the scheme and results from certified third party food safety audits, the current and historical performance regarding food safety, regulatory, quality and/or social responsibility.

After each facility is assessed using decision making criteria, each facility is assigned a High, Medium or Low Risk Rating resulting in a Plant Visit Matrix used to assign the frequency of on-site Sysco QA Plant Visits.

Examples of High Risk Supplier Facilities include those producing refrigerated Ready To Eat (RTE) Deli Meats, RTE Smoked Salmon, RTE Crustaceans, and RTE Produce. Medium Risk examples include potentially hazardous foods that may support pathogen growth, but where the growth is limited due to inherent physiochemical properties, validated interventions or processes that reduce and inhibit the growth throughout the product's shelf life. Low Risk examples are facilities producing products that do not support, or do not inherently possess conditions conducive to the growth of food borne pathogens.

The Sysco Quality Assurance Plant Visit Matrix is updated as new facilities are approved and is reviewed annually to determine resource needs to complete essential travel and to assess any new information such as emerging food safety hazards or new validated intervention technology.



GLOBAL FOOD SAFETY INITIATIVE (GFSI)
Beginning July 2017 Sysco will only accept GFSI schemes.



FOOD SAFETY

Independent Audit Program (IAP)

Sysco Corporation maintains a strong commitment to Food Safety, Product Integrity, and provision of consistent quality products to our Sysco Operating Companies and their end user customers. In an effort to strengthen this commitment, we have developed the Sysco Independent Audit Program (IAP). All Sysco Approved supplier locations and co-packing locations producing Sysco Brand products are required to undergo a 3rd party Food Safety audit each calendar year conducted by a Sysco approved auditing firm. Sysco QA reviews all audits to assure a minimum acceptable score is achieved and that all corrective actions are adequate and implemented in a timely manner. Audit documents are managed through a secure industry network that is a web-based system where companies can store, share, and manage audit documentation and communications with other companies they do business with.

Global Food Safety Initiative (GFSI)

Sysco accepts GFSI recognized schemes to satisfy the requirements for independent food safety audits. The GFSI Mission is to provide continuous improvement in food safety management systems to ensure confidence in the delivery of safe food to consumers worldwide. GFSI schemes are based on the food safety principles laid down by the Codex Alimentarius Commission (Codex), the National Advisory Committee on Microbiological Criteria for Foods (NACMCF), relevant ISO standards, and International Codes of Practice.

Listeria Monocytogenes Controls

Sysco's requirements for control of *Listeria Monocytogenes* (LM) in Refrigerated Salads, Ready To Eat Seafood, Frozen Fruits and Vegetables, Processed

Avocado Products and Ready To Eat Meat and Poultry products include internationally recognized best practices, many of which exceed those codified by regulations.

Sysco Brand requirements are comprehensive to include the entire manufacturing process for LM controls.



Listeriosis, a food borne disease caused by food products contaminated with *Listeria monocytogenes*, is an important public health issue. Listeriosis primarily affects persons of advanced age, pregnant women, newborns, and adults with weakened immune systems. However, persons without these risk factors can also be affected. The mortality rate for persons contracting Listeriosis is nearly 30%; therefore heightened controls for Ready to Eat Meat & Poultry, Seafood, and Deli Salads have been developed to reduce risk to our customers.

Sysco Brand requirements are comprehensive to include the entire manufacturing process, including environmental controls, and provide a set of minimum standards that all Sysco Brand suppliers must comply with through demonstration of equivalent practices for LM Control programs. Sysco Brand Deli Meats adhere to the highest food safety standards

FOOD SAFETY

in the industry whereby the manufacturing processes must be equivalent to low risk as defined by the United States Department of Agriculture Food Safety Inspection Service and/or Canadian Food Inspection Agency and Health Canada. Sysco Brand suppliers must have Hazard Analysis of Critical Control Point Food Safety Systems in place and such plans must include a hazard analysis for control of LM throughout the processing environment. Suppliers are required to scientifically validate that all LM interventions meet or exceed Sysco QA requirements. Comprehensive pre-requisite programs are required. Examples of pre-requisite programs include Good Manufacturing Practices, Sanitation, Food Safety, Hold and Test, Comprehensive Pre Op and During Op Environmental Sampling, Root Cause Analysis with Corrective Action Plans, Laboratory Testing Methodology, Microbiological Interventions and Employee Training.

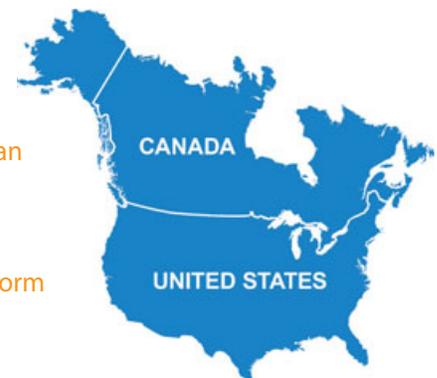
In addition to annual third party Food Safety audits, Sysco QA personnel verify that all high risk RTE Sysco suppliers meet or exceed the minimum LM control requirements by conducting onsite plant visits.

Allergen Controls

Approximately 7% of the United States and Canadian citizens have been diagnosed with or experience some form of food allergies. Of this amount, tens of thousands are rushed to the hospital annually due to an allergic reaction to foods with allergens and hundreds die from it. Despite these statistics there is still no cure for food allergens. The best remedy is that those sensitive to allergens should abstain from foods containing allergens. Presently there are eight allergens recognized in the US, which include Crustacean Shellfish, Eggs, Fish, Dairy, Peanuts, Soy, Tree Nuts and Wheat.

In Canada, along with the top eight, Mustard, Sesame Seeds and Sulphites are also recognized as hazards. In order to assist individuals in avoiding potentially fatal reactions due to food allergen consumption, the FDA has mandated that all food product labeling list the top eight US allergens in their ingredient legend. Canadian regulations require the same information on its labeling for its top 11 allergens and sensitive ingredients.

Approximately 7% of United States and Canadian citizens have been diagnosed with or experience some form of food allergies.

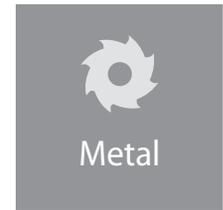
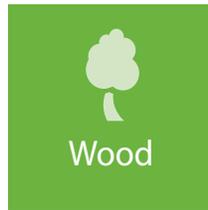


Sysco has developed guidelines for its branded suppliers in order to minimize the risks of cross contamination and to ensure proper identification of all food products containing allergens. The Sysco guidelines are more far reaching than those required by the FDA for allergen control. These guidelines ensure suppliers take a systematic approach in its risk analysis of possible points of cross contamination in their process, develop risk control measures, track allergen usage, and provide proactive identification of allergens in plain language.

Sysco provides detailed directives for its suppliers in the areas of packaging/specification development and review in addition to standard procedures employed during the processing of allergen- or sensitive-ingredient containing food items.

FOOD SAFETY

Sysco Brand Suppliers must demonstrate effective procedures to prevent contamination of products with objects such as:



Examples of directives in these areas would be the annual review of all packaging and specifications to ensure allergens have been declared. There should be a statement for allergens in plain language (such as “Contains Dairy”), required hourly label checks during production runs, separation and segregation of allergens in storage and production, and required cleaning of the lines whenever a changeover occurs between an allergen and non-allergen food product. Updates to these guidelines and requirements are also provided to each supplier on a periodic basis when they experience change.

Additionally, mandated annual third party audits are conducted and any infractions are identified and reported to Sysco Corporate QA in an audit report. The Sysco Allergen Control Guidelines are also provided to all potential suppliers in an introduction packet. Suppliers incapable of meeting Sysco requirements will not be approved. Sysco’s Allergen Control Guidelines continue to evolve and present standards for both Europe and the United Arab Emirates are being added to the guidelines for products distributed in those markets.

Foreign Material Controls and Metal Detection Guidelines

Foreign materials in foods can cause injury. Sysco Brand suppliers must demonstrate effective procedures to prevent contamination of product with

objects such as wood, glass, brittle plastic and metal. The foundation of this program is prevention of foreign material contamination. Strict raw material specifications, planned preventive maintenance programs, good engineering and application of effective Good Manufacturing Practices are examples of the preventive measures required of all suppliers. Sysco Brand suppliers must have approved foreign material detection systems on all lines, such as Filters, Magnets, Metal Detectors, and/or X-rays designed to mitigate risk of ferrous, non-ferrous, aluminum and stainless steel metals below limits established by regulatory agencies as choking hazards.

A Sysco QA Metal Detection Guidelines Best Practices document is provided to all active suppliers and each potential new supplier. The document is designed to provide guidance to the standards Sysco expects from its suppliers. Metal detection programs which go beyond these recommendations are encouraged.

Low Acid Canned Foods

All approved Sysco suppliers of low acid canned foods have implemented processes specific to the product and method of operation to achieve commercial sterility. These processes are established by or are equivalent to a process developed by a competent processing authority. Commercial sterility of thermally processed low acid canned foods

FOOD SAFETY

means the finished product is free of microorganisms of public health significance and those capable of reproducing in the food under ambient storage and distribution temperatures.

Produce: Good Agricultural Practices (GAP)

The Sysco/FreshPoint GAP Program is divided into two areas that improve food quality, food safety and traceability:

- 1 Good Agricultural Practices (GAP)
- 2 Harvest Crew Third Party Audits (GHP)

Authorized Sysco produce suppliers are included in a secure database system which includes their company profile. Suppliers upload third party GAP/GHP audits from all ranches/suppliers into the secured web-based system. The program identifies each supplier's role in the supply chain (e.g. grower-shipper, broker, processor, etc.), the produce products they provide Sysco Operating Companies, and the source of their raw material. The system further ensures that all RTE products and total number of farms/ranches being used to supply those products to Sysco/FreshPoint Companies are accounted for and have been uploaded into the GAP program.

To assure accurate traceability, all Sysco or FreshPoint Branded cartons are marked by a seven-digit Julian Code Dating System:

00	= Supplier ID
000	= Julian Date of Calendar Year
0	= Crew/Ranch/Harvest/Machine Number
0	= Areas of Growing Production
1	= Salinas, CA

Suppliers must have tracking systems in place that provide accurate and legible labeling of all cases/items/packages so that complete and thorough traceability to the actual field can be provided at a moments notice. The database monitors supplier audits, providing reminders of impending expiration dates, thus helping to assure continued compliance. Benefits of the database includes the ability to monitor third party auditor performance, expanding GPS capabilities, and the generation of GAP/GHP-compliant suppliers from whom our Operating Companies are authorized to purchase RTE produce products.

Sysco/FreshPoint supports and enforces all current requirements set forth by the California Marketing Agreement with higher standards in the areas pertaining to water quality and ATP Bioluminescence Testing. The program must identify monitoring methods, sampling plan, frequency of tests performed, acceptable limits and corrective actions taken when limits are exceeded.

Additionally, Initial Audits of all potential suppliers of Sysco/FreshPoint brand field products include GAP/GHP assessments. These initial assessments are conducted by trained Sysco QA staff.

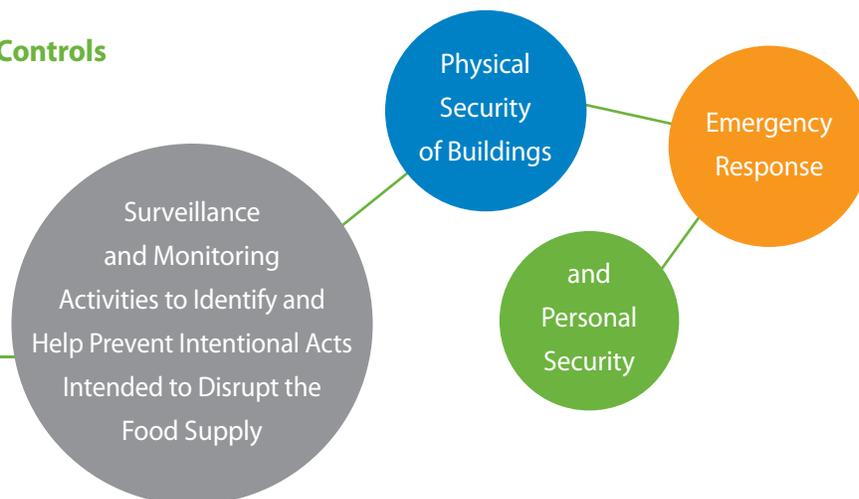
2	= Yuma, AZ
3	= Huron, CA
4	= Oxnard, CA
5	= Santa Maria, CA

FOOD DEFENSE

Supplier and Operating Company Controls

Sysco Suppliers and Operating Companies are required to have demonstrated programs and procedures in place addressing:

Food Defense program compliance is verified by third-party audits and QA plant visits.



Branded supplier and Sysco Operating Company facilities have effective food defense programs including, but not limited to, a food security team with defined roles and responsibilities. Each team conducts a unique product security risk evaluation which helps the management team prioritize the preventive measures that have the greatest impact on reducing the risk of tampering or other malicious, criminal or terrorist actions against Sysco Branded products. All aspects of facility operations are evaluated for vulnerability to sabotage. Ingredient and packaging suppliers must undergo food security evaluations at their facilities or distribution centers, and must have demonstrated procedures for the receipt of damaged goods including inspection and justification for product disposition.

Non-USDA facility manufacturing plant warehouse or distribution centers are registered with the FDA under the Public Health Security and Bioterrorism Preparedness and Response Act of 2002. Sysco Branded suppliers and Sysco OpCo's have effective systems to control access to and from the plant grounds and the manufacturing and storage facilities. Access to sensitive areas is controlled during

operations as well as during off hours or times of shut down. Vehicles entering facility property park in areas visible to plant food security patrol individuals. Non-employee personnel have a designated waiting area that restricts non-employees from processing and/or warehouse areas. Trucks and/or trailers are inspected by trained personnel before and after unloading. Non-traffic doors, dock doors, receiving pipes and hoses are secured at all times. Security processes are in place for issuing, tracking and retrieving keys, identification badges and passes for the building and secured areas. Only authorized personnel have access to the facility and their whereabouts are monitored at all times. In addition, facilities have a documented contractor program with procedures including; GMP, food safety and hygiene rules with training, restriction to defined work areas, options to inspect tool and lunch boxes and a sign in and out log. Regular patrol of outside grounds, outside buildings and roof tops are part of the security programs. Patrols are documented and suspicious activity investigated with law enforcement notified as deemed appropriate by the designated individuals.

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Individual Product Specifications

Sysco QA manages a Product Specification Database describing the finished Sysco Branded products we distribute. Suppliers create Product Specifications by entering data into the shared database. To that end, suppliers are required to submit supplier-specific product information into the Sysco product specification system for items they produce under the Sysco Brand. Suppliers are not to develop packaging or produce and distribute product until each specification is in QA Approved status.



All individual product specifications are reviewed by the product quality manager and department manager for content and to assure they clearly align with the Sysco Brand strategies for points of differentiation and consistency within Sysco Brands. The specifications shall not be moved to QA Approved status by a department manager or director until all criteria is met. These finished product specifications describe the product as sold and include key manufacturing procedures.

The supplier's product specification information is stored in Sysco's managed database for future use and may be requested anytime by both Operating Company and corporate personnel as the need arises.

Information contained in specs may include, but is not limited to, the following (as applicable):

01	Product Description
02	Ingredient Statement
03	Packaging and Code Dating
04	Raw Material Information
05	Unique Processing Procedures or other Point of Differentiation Information
06	Foreign Material Prevention Requirements
07	Pack Size
08	General Quality Specifications and Defect Limits
09	Piece Counts, Weights, Dimensions, Colors, Etc.
10	Handling, Storage and Distribution Information
11	Shelf Life
12	General Analytical Information
13	Nutrition Panel Information
14	Monitoring and Compliance

Monitoring and Compliance

Sysco uses various means of monitoring and compliance to verify that the products we purchase are meeting our product specifications and our customer expectations.

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Monitoring and compliance programs are tailored to the product category, but will include one or more of the following:

- 1 Product and Packaging Evaluations
- 2 Field Specialist Inspection
- 3 Lot Set Aside Evaluations
- 4 Point Source Inspection
- 5 Provision of Certifications of Analysis/Conformance
- 6 Food Safety and Quality Reviews
- 7 Sysco Program Quality Manager Plant Visits
- 8 Independent Lab Analysis
- 9 Initial Production Run Inspection
- 10 Random Lot Inspection
- 11 Submission of On-Going Analytical Reports
- 12 QA Documents (from supplier)
- 13 Verification Supplier Product Evaluations
- 14 Time/Temp Recorders for Supply Chain Control
- 15 Complaint Tracking

Sysco Product Evaluation Center (PEC)

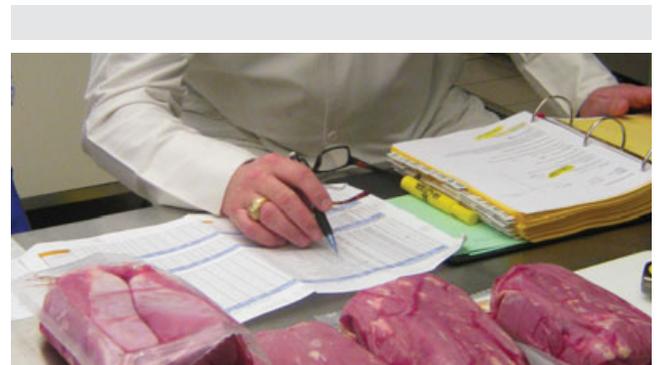
In 2008, Sysco opened a 20,606 sq. ft. Product Evaluation Center (PEC), located at the corporate headquarters in Houston, Texas, to evaluate new samples, current Sysco brand products and competitors' products. The center includes an advanced foodservice kitchen with workstations, a sensory panel area, and an auditorium with adjacent R&D kitchen. The PEC is a manifestation of Sysco's desire to meet customers' expectations and maintain a competitive edge in the industry.

Professionally evaluating products provides value to Sysco and its suppliers. Products are evaluated against agreed purchase specifications to measure supplier

performance. The PEC is also utilized extensively by Sysco and supplier chefs to create and present new menu items for our valued customers. Supplier performance evaluations are an ongoing verification activity across all Sysco product categories. Additional evaluations are performed during plant visits and inside the PEC.

QA personnel issue reports after each evaluation and corrective action plans are developed as needed to improve the product and processes.

The following are examples of the foodservice equipment used: in the P.E.C. fryers, convection ovens, stoves, steam kettles, char-broiler, salamander, and steamers to prepare and evaluate a wide array of food categories that are distributed in the marketplace. The sensory panel area provides the company with an opportunity to gain consumer insight prior to the release of a new or improved product. The area includes 8 individual sensory booths which allow internal, external, and expert participants to sample and evaluate single or multiple product attributes including visual, texture, taste, and aroma. The auditorium and R&D kitchen are available for food demonstrations and presentations. The PEC is a welcome addition to the corporate headquarters.



QUALITY

Field Specialists

Sysco Brand approved suppliers have the responsibility of producing products that meet the mutually agreed upon Sysco specifications and must maintain effective QA/QC procedures to monitor and ensure specification compliance. The success of the program is dependent on sound production and quality assurance efforts by our select and valued suppliers. Sysco QA works closely with its suppliers to define the monitoring requirements and reporting to demonstrate compliance.

In conjunction with supplier monitoring, Sysco QA utilizes skilled, independent Field Specialists to routinely evaluate the quality and consistency of our Sysco Brand products in the plants where the products are produced. High volume, high value commodities are inspected during production runs and/or post processing against Sysco brand specifications.

Point Source Inspection Program (PSIP)

The implementation of the Point Source Inspection Program (PSIP) effectively changed the inspection methods associated with Sysco Brand imported products (Import Commodities and Seafood) procured from many of our suppliers. Sysco QA worked closely with SMS and our approved Import Commodity and Seafood suppliers in the establishment of inspection procedures for Sysco Brand products, resulting in a streamlined and more efficient inspection process. In the case of internationally based approved suppliers, the inspection of Sysco Brand products formerly occurred following their arrival in the United States. The determination that product failed to comply with Sysco Brand Product Quality Specifications following arrival in the United States added cost, supply disruptions and considerable inconvenience for all parties throughout the distribution chain. Sysco

QA and SMS determined, with input from our valued import supplier base, that the inspection of Sysco Brand products had to be executed at the point of production, now known as PSIP. Sysco QA developed strategic alliances with offshore partners for the execution of sampling and quality evaluations at our approved supplier's processing facilities.



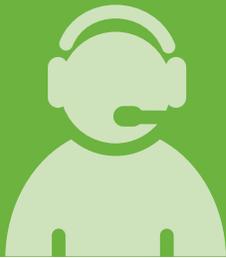
Field Specialist In Plant Evaluation

These efforts are coordinated by Sysco QA following receipt of a Sysco Brand production and shipping notification form. The sampling plans and evaluation requirements utilized by our partners are established and maintained by Sysco QA. The PSIP program includes procedures associated with third party analysis of products for contaminants, as directed by Sysco QA.

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The implementation of the PSIP program does not relieve our approved suppliers from their responsibility of producing products that meet the mutually agreed upon Sysco specifications nor does it eliminate the supplier/importer responsibility for maintaining bona-fide, effective QA/QC procedures to monitor and ensure specification compliance. The success of the program remains now, as it always has, dependent on sound production and quality assurance efforts by our valued suppliers.

Brand standard of quality, or if a customer contacts an Operating Company with a product quality complaint, a Product Discrepancy Notice (PDN) form is completed to notify Sysco QA of the issue. Upon submission of the PDN, an email with the pertinent information is sent to the following parties: risk manager, senior claims manager, QA Vice President, and QA Directors. The PDN is then routed and assigned to the responsible Program Quality Manager (PQM) responsible for that particular



If a customer contacts an Operating Company with a product quality complaint, a PDN form is completed and assigned to the responsible Program Quality Manager responsible for that product category.

The procedures outlined in the PSIP program are intended only as an additional “check” on the system. PSIP includes, at the direction of Sysco QA, routine audits of approved supplier’s quality assurance programs and associated documentation. In-depth information pertaining to the PSIP program can be reviewed in the Standard Operating Procedure Guidelines for Import and Seafood products.

Sysco Brand Product Discrepancy Notice Program (PDN)

The Sysco QA department makes it a priority to ensure we market consistent quality products on a continuous basis to our Sysco Operating Companies and their customers. If an Operating Company receives a product that does not meet the Sysco

product category. The PQM pursues a thorough investigation of the product discrepancy, confirms any corrective actions taken by the supplier, reports results of investigation to the Operating Company and Customer, and records the findings on the PDN form for aggregation of data.

PDN summary reports are reviewed by the Sysco QA management team in order to ensure that all discrepancies are resolved quickly, as well as to evaluate and address any trends that may be occurring. The PDN system helps Sysco QA to ensure customers are satisfied and are receiving consistent quality and value for products purchased under the Sysco Brand.

QUALITY



Sysco QA personnel are required to complete announced and unannounced plant visits to approved supplier locations.

Sysco QA Plant Visits - Approved Suppliers

To help ensure the consistency, food safety, and quality of Sysco Brand products, Sysco QA personnel are required to complete announced and unannounced plant visits to approved supplier locations that manufacture those Sysco Brand products. Sysco QA plant visits are assigned based on risk and managed through a plant visit matrix. The plant visits are made by Sysco Program Quality Managers, Department Managers or Directors and involve, but are not limited to, completion of a physical inspection of the facility, a review of the facility Food Safety and Quality Systems, Managements Commitment and an in-depth review of specific supporting documents and process controls pertinent to key food safety programs.

The physical plant inspection includes examination of the manufacturing processes/equipment, foreign material control (metal detection, magnet traps, screens, filters, X-ray, etc.), temperatures (ambient and/or product), GMP (Good Manufacturing Practices) policies and procedures, verification of HACCP documentation (Critical Control Points), verification of corrective actions completed arising from deficiencies

noted on third party audits, and product evaluations. Plant documentation review may include traceability (back to raw materials and through production and forward through distribution), pest control documentation, allergen program compliance, on-line finished product inspection documentation, environmental and microbial test results, HACCP related documents, validation and verification supporting documents for pre-requisite programs and other pertinent areas associated with required Sysco program(s) relevant to the individual category.

Other visits to approved locations may be for the purpose of observing activities of a field specialist(s) assigned to a particular facility. A visit could also be for the purpose of addressing immediate food safety or quality issues. These may include: recent recalls, follow-up to a failed Independent Third Party Audit, product complaints, initial production runs, review of new technology implementation, and/or equipment replacement on lines producing Sysco Brand items.

REGULATORY & TECHNICAL SERVICES

Crisis Management Program

In a crisis situation, Sysco's Crisis Notification System is designed to notify key individuals within Sysco to effectively protect our brand integrity and shareholder equity.



A list of key customer contacts has also been included to rapidly assist Sysco customers in addressing a crisis situation.

Triggering events for this process would include nationwide Class 1 Recalls of a National Brand or Sysco Brand product where serious illness is a distinct possibility and Sysco involvement is extensive.

The information provided during an actual crisis situation will include the same information that is routinely forwarded to Sysco Operating Companies via e-mail in the event of a recall. The Crisis Notification System message will not replace the e-mail communications but instead is intended to emphasize the importance of following the directions provided. Generally, there will be no action required of the call recipients in response to the call beyond ensuring that the recall directions provided are followed as described.

Recall Procedures

Product recalls are an ever-increasing fact of business. When manufacturers find a problem either with the safety or quality of their products it is incumbent upon them to remove the product from the distribution system. As Sysco grows and becomes an even bigger part of the distribution system our involvement in product recalls and withdrawals has grown as well.

A basic tenet of effective crisis management is efficient and comprehensive communication. Sysco Quality Assurance has taken the lead in this regard and has developed a recall communication system designed to notify all involved, in as rapid a manner as possible, of the details of any product recall/withdrawal situation, as well as any responsibilities they might have. Guidelines have been developed to facilitate communication between the recalling firm/supplier, Sysco Operating Companies, and affected customers involved. This plan minimizes disruption and describes step-by-step the procedure to follow in the event of a recall.

Seafood HACCP

In accordance with Title 21 Code of Federal Regulations Part 123, the Seafood HACCP Regulation, Sysco seafood suppliers shall have an adequate Hazard Analysis and, should any hazards be identified, a corresponding HACCP plan. The HACCP plan shall follow the strategies outlined in the US Food & Drug Administration's Fish and Fishery Products Hazard and Control Guide for the specific type of seafood product and processing. The HACCP plan must be adequate to ensure control of all hazards associated with the specific product. Additionally, processors of raw molluscan shellfish must include in their HACCP plan the requirements as recommended by the National Shellfish Sanitation Program Model Ordinance. Likewise, Sysco Operating Companies that receive, store, and distribute Sysco seafood products have also conducted a Hazard Analysis and when hazards were found a corresponding HACCP plan is in place.

EDUCATION & DEVELOPMENT

Employee Training and Professional Memberships

Sysco provides ongoing professional development training for all Quality Assurance staff associates through a number of resources including individual offsite technical training, webinars, in house group seminars and interactive web-based course work.

Operating Company and Customer Support

Sysco's QA Department, which includes a Food Safety Team, is a viable resource to support the Sysco Operating Companies and their customers with product expertise or knowledge on current technical and/or regulatory issues related to our functional areas of Food Safety, Seafood HACCP, Product Quality, Product Claims, Regulatory, Recall Communications, and Health/Nutrition. Sysco's degreed QA Staff members have product expertise acquired from their formal education and ongoing skills development, as well as practical work experience in all of the food and related food service supply categories that Sysco markets.

Our organizational structure has been established based on product expertise, which enables us to direct resources to address and support specific Operating Company or MUA customer needs, including support during Regulatory Authority visits, Customer Audits, Sales Meetings, Sysco Techs, or Sysco Brand Advantage Evaluations. Many Sysco QA staff members are remotely located in our operating companies to facilitate a more immediate response to critical issues.

Industry, Academic and Research Engagement

Sysco Corporation encourages active involvement with professional associations within the Food and Beverage Industry. Sysco QA Managers and Directors actively serve on many professional committees and sustainable stewardship initiatives to improve the food safety, quality, animal welfare and sustainability in their respective food industry segments. Sysco also contributes personnel time and financial resources to food safety research and education outreach programs.





The Sysco Promise.

Food safety is our No. 1 priority. We are committed to providing safe, quality-assured products to our customers.

Call 281-584-1350 for more information.

Good things
come from
Sysco[®]

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