



# Audit Report – Head Office

Global Standard for Storage and Distribution Issue 3: August 2016

1. Audit Summary			
Company name	Brakes Food Service Ltd	BRC Site Code	BRC Site code
Site name	Enterprise House, Eureka Business Park, Ashford, Kent		
Scope of audit	The management systems for wholesale (branded and own brand), storage and distribution of frozen, chilled and ambient food products and non-foods products at depots within the group.		
Exclusions from scope	None		
Justification for exclusion	Not applicable.		
Audit Start Date	2019-07-24		
Audit Finish Date	2019-07-24		
Re-audit due date	2020-07-30		

2. Audit Results					
Audit result	NOT CERTIFICATED	Audit grade	No Grade	Audit type	Announced
Previous audit grade	Choose an item	Previous audit date	2019-07-30		

Number of non-conformities	Critical	0
	Major	0
	Minor	0

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### 3. Company Details

Address	Enterprise House Eureka Business Park Ashford Kent TN25 4AG		
Country	UK	Site Telephone Number	01233 206002
Commercial representative Name	Commercial representative Name	Email	Email
Technical representative Name	Rose Smith	Email	Rose.smith@brake.co.uk

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### 3a. Site details (list all sites to be associated with Head Office audit)

No.	Client No (C0146919)	Site Name	Provisional Audit Date
1	Brakes – Aylesford	Brakes (Aylesford) Unit A Riverside Business Park New Hythe Lane Aylesford Kent ME20 6SW	01.05.2020
2	Brakes – Bodelwyddan	Brakes (Bodelwyddan) Royal Welch Avenue Bodelwyddan Denbighshire LL18 5TQ	24.10.2019
3	Brakes – Bodmin Cornwall	Brakes (Bodmin Cornwall) Victoria Business Park Roche Cornwall United Kingdom PL26 8LX	17.09.2019
4	Brakes – Brighton	Brakes (Brighton) Crowhurst Road Hollingbury Industrial Estate Brighton East Sussex BN1 8AF	03.03.2020
5	Brakes - Coventry	Brakes (Coventry) Richardson Way Cross Point Business Park Coventry CV2 2TP	12.08.2020
6	Brakes - Dundee	Brakes (Dundee) Riverside Distribution Centre Wright Avenue Dundee DD2 1UD	22.07.2020
7	Brakes – Durham	Brakes (Durham) Bowburn North Industrial Estate Bowburn Durham DH6 5PF	12.08.2020
8	<b>Brakes – Eastleigh</b>	Brakes (Eastleigh) Parham Drive Boyatt Wood Industrial Estate Eastleigh Hampshire SO50 4NU	11.02.2020

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9	Brakes - Grantham	Brakes (Grantham) Palmer Road, A1 Triangle Gonerby Moor Grantham Lincolnshire NG32 2BW	07.05.2020
10	Brakes - Harlow	Brakes (Harlow) Flex Meadow Harlow Essex CM19 5TJ	14.01.2020
11	Brakes – Hemsworth	Brakes (Hemsworth) Hoyle Mill Road Kinsey Near Pontefract West Yorkshire WF9 5JB	30.04.2020
12	Brakes – Inverness	Brakes (Inverness) 17 Seafield Road Inverness Scotland IV1 1SG	08.11.2019
13	Brakes - Montgomery	Brakes (Montgomery) Station Yard Montgomery Powys SY15 6HB	17.04.2020
14	Brakes – New House Scotland	Brakes (New House Scotland) Edinburgh Road Motherwell North Lanarkshire Scotland ML1 5SY	27.07.2020
15	Brakes – Peterlee	Brakes (Peterlee) Unit 5 Burdon Drive North West Ind Est Peterlee SR8 2JH	09.04.2020
16	Brakes - Portbury	Brakes (Portbury) Portbury Way Royal Portbury Dock Bristol BS20 7XN	15.08.2020
17	Brakes – Premier Park	Brakes (Premier Park) Premier Park Road Park Royal London NW10 7NZ	05.05.2020
18	Brakes - Reading	Brakes (Reading) Unit 24 Suttons Business Park	07.05.2020

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		Earley Reading Berkshire RG6 1AZ	
19	Brakes - Thetford	Brakes (Thetford) Units 1-4 Baird Way Fisson Way Industrial Estate Thetford Norfolk IP24 1JA	28.04.2020
20	Brakes - Warrington	Brakes (Warrington) Unit 3 Lockheed Road, Burtonwood & Westbrook, Warrington, Cheshire WA5 4AH	07.05.2020

4. Company Profile					
Plant size (metres square)	Choose an item	No. of employees	Choose an item	No. of Vehicles	Choose an item
Subcontracted processes	No				
Other certificates held	Red Tractor, MSC /ASC, Organic, RSPO Palm Oil (Own brand)				
Regions exported to	None				
Major changes since last BRC audit	None				

#### 4. Company Profile

##### Company Description

The company distributes food products throughout the UK, and Europe to the catering, wholesale and industrial sectors of the food industry. Annual turnover is in excess of £3 billion and the company has approximately a 20% share of the food service sector. The Head Office in Ashford employs around 600+ staff and oversees several businesses including food service, logistics and grocery. M & J Seafood and Pauley's now belong to a separate business entity outside the scope of this assessment. Brakes branded, customer-branded and manufacturer branded products are distributed out of 20 depots. The technical resources for the business were evaluated and included supplier approval, purchasing and support functions. The company operates Brakes Assure, a technical data base which allows the company improved management of suppliers, specifications and marketing activities. The business handles approximately 4000 + own brand SKUs using circa 750 suppliers – total number of lines is 15,000.

#### 5. Product Characteristics

	StorageDistribution
Product categories	01 - Chilled and Frozen Food 02 - Ambient Food 03 - Packaging and packing materials 04 - Consumer Products
Activities	01 - Storage 02 - Distribution 04 - Wholesale Module

#### 6. Audit Duration Details

On-site duration	8 man hours	Duration auditing the site and vehicles	Head office assessment
Reasons for deviation from typical or expected audit duration	Well established QMS and head office activities only audited Head office audit only		

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#### 6.Audit Duration Details

Next audit type selected	Announced
Audit frequency	12 months

#### Audit Duration per day

Audit Days	Audit dates	Audit Start Time	Audit Finish Time
1	2019-07-24	08:30	16:30

	Auditor <u>(s)</u> number(s)	Names and roles of others
Auditor Number	207016	Alexander Howells
Second Auditor Number	N/A	

#### Present at audit

Name/Job Title	Present at Audit (x)			
Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings (ref: clause 1.1.8)	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
Barry Mirhabib – Head of Technical	X		X	X
Rose Smith – Dist Quality Manager	X		X	X
Veronica Johnson – Technical Manager			X	

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#### 4. Company Details

Address	Enterprise House, Eureka Business Park, Ashford, Kent		
Country	United Kingdom	Site Telephone Number	01233 206002
Commercial representative Name	Commercial representative Name	Email	Email
Technical representative Name	Rose Smith	Email	Rose.smith@brake.co.uk

#### Additional Locations

Site Name	Address	Activities
Brakes – Aylesford	Brakes (Aylesford) Unit A Riverside Business Park New Hythe Lane Aylesford Kent ME20 6SW	01 - Storage 02 - Distribution 04 - Wholesale Module
Brakes – Bodelwyddan	Brakes (Bodelwyddan) Royal Welch Avenue Bodelwyddan Denbighshire LL18 5TQ	01 - Storage 02 - Distribution 04 - Wholesale Module
Brakes – Bodmin Cornwall	Brakes (Bodmin Cornwall) Victoria Business Park Roche Cornwall United Kingdom PL26 8LX	01 - Storage 02 - Distribution 04 - Wholesale Module
Brakes – Brighton	Brakes (Brighton) Crowhurst Road Hollingbury Industrial Estate Brighton East Sussex BN1 8AF	01 - Storage 02 - Distribution 04 - Wholesale Module

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Brakes - Dundee	Brakes (Dundee) Riverside Distribution Centre Wright Avenue Dundee DD2 1UD	01 - Storage 02 - Distribution 04 - Wholesale Module
Brakes – Durham	Brakes (Durham) Bowburn North Industrial Estate Bowburn Durham DH6 5PF	01 - Storage 02 - Distribution 04 - Wholesale Module
<b>Brakes – Eastleigh</b>	Brakes (Eastleigh) Parham Drive Boyatt Wood Industrial Estate Eastleigh Hampshire SO50 4NU	01 - Storage 02 - Distribution 04 - Wholesale Module
Brakes - Grantham	Brakes (Grantham) Palmer Road, A1 Triangle Gonerby Moor Grantham Lincolnshire NG32 2BW	01 - Storage 02 - Distribution 04 - Wholesale Module
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Brakes – Hemsworth	Brakes (Hemsworth) Hoyle Mill Road Kinsey Near Pontefract West Yorkshire WF9 5JB	01 - Storage 02 - Distribution 04 - Wholesale Module
Brakes – Inverness	Brakes (Inverness) 17 Seafeld Road Inverness Scotland IV1 1SG	01 - Storage 02 - Distribution 04 - Wholesale Module
Brakes - Montgomery	Brakes (Montgomery) Station Yard Montgomery Powys SY15 6HB	01 - Storage 02 - Distribution 04 - Wholesale Module
Brakes – New House Scotland	Brakes (New House Scotland) Edinburgh Road Motherwell	01 - Storage 02 - Distribution 04 - Wholesale Module

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	North Lanarkshire Scotland ML1 5SY	
Brakes – Peterlee	Brakes (Peterlee) Unit 5 Burdon Drive North West Ind Est Peterlee SR8 2JH	01 - Storage 02 - Distribution 04 - Wholesale Module
Brakes - Portbury	Brakes (Portbury) Portbury Way Royal Portbury Dock Bristol BS20 7XN	01 - Storage 02 - Distribution 04 - Wholesale Module
Brakes – Premier Park	Brakes (Premier Park) Premier Park Road Park Royal London NW10 7NZ	01 - Storage 02 - Distribution 04 - Wholesale Module
Brakes - Reading	Brakes (Reading) Unit 24 Suttons Business Park Earley Reading Berkshire RG6 1AZ	01 - Storage 02 - Distribution 04 - Wholesale Module
Brakes - Thetford	Brakes (Thetford) Units 1-4 Baird Way Fisson Way Industrial Estate Thetford Norfolk IP24 1JA	01 - Storage 02 - Distribution 04 - Wholesale Module
Brakes - Warrington	Brakes (Warrington) Unit 3 Lockheed Road, Burtonwood & Westbrook, Warrington, Cheshire WA5 4AH	01 - Storage 02 - Distribution 04 - Wholesale Module

## 5. Company Profile

Plant size (metres square)	Choose an item	No. of employees	Choose an item	No. of Vehicles	Choose an item
Subcontracted processes	No				

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## 5. Company Profile

Other certificates held	Red Tractor, Organic, MSC /ASC, RSPO Palm Oil (Own Brand)
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Regions exported to	None
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Major changes since last BRC audit	Major changes since last BRC audit
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### Company Description

The company distributes food products throughout the UK, and Europe to the catering, wholesale and industrial sectors of the food industry. Annual turnover is in excess of £3 billion and the company has approximately a 20% share of the food service sector. The Head Office in Ashford employs around 600+ staff and oversees several businesses including food service, logistics and grocery. M & J Seafood and Pauley's now belong to a separate business entity outside the scope of this assessment. Brakes branded, customer-branded and manufacturer branded products are distributed out of 20 depots. The technical resources for the business were evaluated and included supplier approval, purchasing and support functions. The company operates Brakes Assure, a technical data base which allows the company improved management of suppliers, specifications and marketing activities. The business handles approximately 4000 + own brand SKUs using circa 750 suppliers – total number of lines is 15,000.

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6.Audit Duration Details			
On-site duration	8 man hours	Duration auditing the site and vehicles	Head office assessment man hours
Reasons for deviation from typical or expected audit duration	Well established QMS and head office activities only audited Head office audit only		
Next audit type selected	Announced		
Audit frequency	12 months		

	Audit Start Time	Audit Finish Time
<b>2019-07-30</b>	08:30	16:30

	Auditor_(s)_number(s)	Names and roles of others
Auditor Number	207016	Alexander Howells
Second Auditor Number	N/A	

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# Non-Conformity Summary Sheet

## Critical

No.	Requirement ref.	Detail of Non-Conformity	Corrective action taken	Anticipated re-audit date

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## Major



No.	Requirement ref.	Detail of Non-Conformity	Correction	Proposed preventive action plan (based on root cause analysis)	Evidence provided Document Photograph Visit/Other	Date reviewed	Reviewed by

## Minor

No.	Requirement ref.	Detail of Non-Conformity	Correction	Proposed preventive action plan (based on root cause analysis)	Evidence provided Document Photograph Visit/Other	Date reviewed	Reviewed by

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#### Comments on non-conformities

Not applicable.

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## Detailed Audit Report

### 1.Senior Management Commitment

The company has a documented Product Safety and Quality Policy signed by the Group Chief Executive Officer Hugo Mahoney (Doc ref 6QLFC). The Quality Manual is managed centrally by RS and made available to each depot via the company's intranet system with email notification of changes made.

Central Head Office and supply base provide legal and technical information to the Group and Brakes Group are members of Campden BRI, Leatherhead RA, and BFFF. NB (Head of Distribution Quality) sits on BFFF committees and BM (Head of Technical Services) on Campden Technical Panels with specialist reference to Microbiological Safety of Foods.

Quality Objectives have been determined (per depot) and include a commitment to reduce customer complaints. These are documented on a monthly report and sent out to all depots. Individual depots review this during monthly reviews.

Management Reviews are conducted centrally on an annual basis covering the Quality Management System. The agenda for the meeting covers as a minimum the requirements of the BRCGS S&D Standard: Matters arising, Risk control dashboard, Quality Management Systems, Technical scorecard, Head Office audit, External audits, Customer complaints, Depot audits, Enforcement body visits, Incident and recall, Legislation and Product Safety. All senior management attend the meetings and minutes dated 22.02.2019 were reviewed. Minutes of previous meeting; covered the following.

Depot audits by QA Managers 2018: 66 conducted – 2017:82

7 major non-conformances in 2018 vs 35 in 2017

527 minor non conformances in 2018 vs 650 9n 2017

EHO Visits 6.

The results from the senior management review are cascaded to each depot who then keep them on file for reference and are audited through the DQM audits for each depot.

There is a management structure which facilitates clear communication channels to senior management and involves the

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Group Distribution Director, Regional Operation Directors, Head of Distribution Quality, Depot Quality Managers and Depot Management Representatives.

There is an organisational structure chart available for the UK Technical Team which details reporting lines and cover for absence of key staff. Organograms are also in place to show the relationship of the Technical Team with the rest of the management. Individual Depots have separate charts.

Technical Director, Head of Technical Services Safety and Nutrition, Head of Product Technology, Category Technical Managers, Category Technologists.

Individual sites are approved by relevant local authorities.

Employees are made aware of their responsibilities through Job Descriptions which were reviewed during this Head Office Assessment. Job descriptions cover the following requirements, competence, knowledge, key accountabilities & performance.

The company has set a number of quality objectives (Doc ref 93T4AB) which are applicable to each depot and include:

- Temperature complaints – target <30 complaints per million units (CMPU)
- Damages – target <300 complaints per million units (CMPU) (Alert 500 CPMU)
- Damages (Fresh Produce) - Less than 130 complaints per million units.
- Maintain certification to the BRC Global Standard for Storage & Distribution.

These are monitored through monthly meetings with information provided for depot and reported to the individual depots through the DQM's. Reviewed data from Periods 1-12 (covering the end of the company financial year to June 2019).

The company has both electronic and hard copies of the standard which were available to the auditor during the assessment. The head office is registered with a Primary Authority agreement with Kent County Council.

There are organisational structures in place. Each depot has their own depot level structure with dotted line reporting into head office functions

Job descriptions are available and reviewed for:

Depot Quality Manager, Technical Manager and Category Technical Manager.

The company are members of various organisations to maintain up to date knowledge of legislation and scientific developments such as BFFF, Campden BRI, Food Industry Intelligence Network (FIN) member, FERA – Horizon Scanning, Freight Transport Association and FORS membership for London depots.

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#### N/A Clauses

No.	Justification

## 2.Hazard and Risk Analysis

The company has carried out a HACCP study in accordance with the requirements of Codex Alimentarius. The study was undertaken at head office by a multidisciplinary team, led by the Head of Distribution Quality with team members, Head of Technical Services and Food safety and Distribution Quality Managers. All team members have undergone suitable training and records were seen during this assessment.

The study is generic for product supply and for ambient, chilled and frozen storage and transportation. It was developed initially in 1998 and is reviewed for effectiveness on an annual basis with focus on pre-requisite controls and key temperature measurement CCP's. The HACCP plan is scoped to include supplier selection and monitoring, delivery, storage, collation and shipping also includes product returns. The HACCP study is issued centrally to each of the depots all of which have at least one HACCP trained team member.

Physical, chemical and microbiological hazards have been considered in the risk assessment as have those related to allergens. The Risk control dashboard incorporates the HACCP, TACCP and VACCP. A master process flow has been agreed by the team and Critical Control Points have been identified using a decision tree and likelihood versus risk assessment. The risk assessment has highlighted a number of pre-requisites which are documented along with their controls, responsibilities and records. Pre-requisites include supplier approval, frozen product temperature controls, environmental temperature controls, cleaning, goods in to include marshalling time frames, waste management, pest control, calibration, personal hygiene, training and traceability. The assessment has identified two CCP's which are applicable at depots according to product.

The HACCP study highlights records, procedures and responsibilities or the management of each CCP. Validation of critical control points is based upon legislative requirements for storage of food and Brakes own Standard.

HACCP review meetings are carried out on an annual basis with records of the last review were seen to be comprehensive.

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The Distribution HACCP Team consists of:

- NB – Head of Distribution – team leader – RSPH, Certificate in Essential HACCP Practise issued 1998
- BM – Head of Technical services, nutrition & product safety
- GW-K – Head of product technology
- SM – Distribution Quality manager Grantham
- WW – Distribution Quality manager Hemsworth
- RS – Distribution Quality manager Enterprise House
- EC – Distribution Quality manager Portbury –

The scope of the HACCP covers the storage and distribution of all ambient, chilled frozen and associated non-food items and packaging received from suppliers and delivered to customers, with the BRC certification covering Chilled & Frozen Food, Ambient Food and Consumer Products & Packaging

Flow Diagram 4TBN94:10.05.2019 is signed by each individual depot.

The associated hazards have been identified within the pre-requisite management controls 8K6JHP 10.05.2019 as being Physical, Chemical, Microbiological, Allergens, with the control plan showing each stage of the operation in place.

A decision tree 8K6K6Y/27.07.11 has been used to identify 2 x CCP's:

- CCP1 - Goods In temperature of Chilled (External deliveries and backhauls)  
Dairy & Deli: Max +5°C  
Fresh Fish 0°C - +2°C  
Chilled Offal: Max 3°C  
Chilled Minced Meat / Minced Poultry: Max +2°C  
Other products of animal origin (POAO) raw and cooked  
Document references; Goods in procedures (4NYC39)  
Incoming template checks: (4TBMJE)  
Technical Temperature Assessment Procedure (9TMRA6)
- CCP2 – Goods in storage of chilled products – Chilled Meat Chambers – 0-2°C, Other Chilled Product Stores 1-4°C (products handled at maximum 5°C for up to 2 hours).  
Document references;  
Coldstore & Chiller Man Procedure (7T6TUL)  
Coldstore & Chiller Monitoring Procedure (6TULHL)

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#### Coldstore & Chiller Operating & Breakdown Procedure 96GAGMS)

Risk analysis BK6JMK/12.03.2019 covers the associated hazards and is listed in tabular format including the control measures for each process step. The risk analysis is based around a Severity V's Likelihood scoring matrix.  
Last full HACCP review was conducted 12.03.2019 and included all team members.

#### N/A Clauses

No.	Justification

### 3. Quality Management

#### Summary

There is a full QMS which is organised through the company intranet which all depots having direct access to (E-Vista). The QMS is managed from the head office by RS (DQM) and covers all the requirements of the BRCGS standard Version 3. All documents are controlled by having a unique 6-digit number along with the date of issue. Depots have locally controlled records which will be challenged at each individual depot.

Document control procedure: 6GAHPZ.

Any amendments are shown on the intranet system with a complete record of all amendments and dates and version number. All amendments to central documents are emailed to the individual depots, with the intranet (E-Vista) being a "live" system all new documents are available for immediate use. Depots are audited to ensure they are using the correct version. Evidence of this was reviewed with the following documents that had been distributed by RD (DQM):

Delivery Procedure – 15.03.2019 – Doc ref 6NYFH7

Backhaul Procedure 04.07.2019 -Doc ref 6NZFJM

Backhaul Record 04.07.2019 – Doc ref 7KTG4T

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All records are retained for a period of 5 years if any temperatures recorded, or for a minimum period of a year as per procedure 6QLFTC electronic documents are backed up on the server daily.

There is a schedule of internal audits for each Distribution Quality Manager's area – reviewed internal audit schedule for RS, covering head office.

Reviewed Head Office audit conducted by RS DQM 11.06.2019

RS (DQM) Practical Auditing of Quality Management Systems to ISO 9001:1994 & ISO 10011-1:1994 – issued 1998

WW (DQM) 24-28<sup>th</sup> September 2007 Lead Auditor

SM (DQM) 03-07<sup>th</sup> September 01 Lead Auditor

Internal Audits are scheduled and include all required section of the standard. A company internal audit schedule is in place and details the planned frequency of all internal audits. These are conducted annually at Head Office and Depot audits are conducted by the team of Depot Quality Managers at a minimum rate of at least twice per year. The frequency of audits is based on the number of NC's raised;

- A (Gold 1-5 minors) = 4-6-monthly
- A (Silver 6-10 minors) = 4-6 monthly
- B (Bronze 11 – 15 minors) = 3 monthly,
- C (16-20 minors) = 1-3-monthly.
- C >20 minors or any majors= Fail

A number of trained Internal Auditors are used, and impartiality is maintained. Various internal audit reports were reviewed during this assessment. Records were seen to include non-conformance information, planned corrective actions and preventive actions, defined via root cause analysis where appropriate, and corrective action completion with verification (during next audit).

Company procedures are in place for all required corrective actions. Corrective action is applied for non-conforming products, complaints and any non-conformances raised during internal audits. All corrective actions are logged on the Corrective Action Log and reviewed during Monthly KPI Reviews. The Technical departments scorecard dated July 2018 to June 2019 was reviewed.

A corrective & preventive action procedure is in place and is linked to the QC Hold, Non-conformance & Rejections Procedure: 55CH54. All issues raised by the depots are recorded onto a central log, and issues are forwarded onto the suppliers with root cause analysis information required.

Procedures are in place for the control of customer contractual arrangements and are managed by Head Office. This involves over 400+ Group Contracts and KPI's are established relating to customer requirement. The following were reviewed, TL Group dated 01.11.2017 and J&J dated 29.05.2019.

Contracts for service providers are managed centrally at Head Office and there are no subcontractors used.

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Supplier Approval & Monitoring Procedure including site services doc ref 8SUPP.

Reviewed contract for Ecolab – pest control – commencement date 04.01.14 – rolling contract.

Reviewed contract for waste management by ACM – issued 01.11.2018

Traceability of products is managed through SAP stock management system, which can trace the product from intake to depot movements and on to final despatch to the customer. A traceability challenge is conducted at least annually at each individual Depot.

A product recall procedure is in place which is tested at least annually by head office (usually during actual product recalls).

Incident management and crisis management procedure is comprehensive and details out of hours contacts. The manual contains complete information to deal with emergency situations, procedures for escalation of incident plus team responsibilities.

Brakes Broadline Recall Procedure 6U79ZR/11.05.18 includes the method of communication to customers, all recalls are controlled through the head office with the depots being involved from a stock management system and any potential pick-ups from customers. The company had a product recall on the 08.07.2019, code R32554, batch code L915AT BBE- 24.10.2020 & L9117AT BBE 26.10.2020, incident report REF007. Numbers of customer involved checked through a sales report with the sales team given the responsibility to inform the necessary customer. Incident Management Procedure with a central number to call in the event of any process which could affect the entire business, with each individual depot holding a site-controlled Business Continuity Plan covering the requirements of each depot.

QC Hold, Non-conformance & Rejections Procedure: 55CH54. All issues raised by the depots are recorded onto a central log, and issues are forwarded onto the suppliers with root cause analysis information required.

Returned Products Procedure 4NYBWL covers; QC Collection; Collection; Undelivered Goods; Brake Logistic Customer Returns; Internal Transfers. Chilled products which have been outside of Brake's control are not accepted back and disposed of. Ambient and frozen goods are risk assessed on return before being accepted back into stock.

All complaints are handled by the customer services team at head office who log and record all complaints received via the central number for all customers to call. Complaints are then passed across to the relevant department for investigation, where applicable. The technical team will be involved with serious quality, safety and foreign body investigations. The current trending analysis on the technical dashboard, which is divided into individual tabs covering all of the product categories and includes all the trending YOY and period by period was reviewed. Customer complaint levels form part of the objectives are reviewed on a monthly basis as well as the senior management review. Data from July 2018 to June 2019 was reviewed during the assessment.

#### N/A Clauses

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No.	Justification
3.5.2	No sub-contracted process
3.6	Traceability not challenged at head office
<b>4. Site and Building Standards</b>	
This report relates to head offices functions only and therefore this section of the report is not applicable	
<b>N/A Clauses</b>	
No.	Justification

<b>5. Vehicle Operating Standards</b>	
This report relates to head offices functions only and therefore this section of the report is not applicable	
<b>N/A Clauses</b>	
No.	Justification

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## 6. Facility Management

This report relates to head offices functions only and therefore this section of the report is not applicable

### N/A Clauses

No.	Justification

## 7. Good Operating Practices

This report relates to head offices functions only and therefore this section of the report is not applicable

### N/A Clauses

No.	Justification

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## 8. Personnel

This report relates to head offices functions only and therefore this section of the report is not applicable

### N/A Clauses

No.	Justification

## WHOLESALE MODULE

### 9. Purchasing – branded products

The Head Office is the central location for the management of suppliers and products and a supplier approval, management and review system is contained on Brakes Assure database which is managed by Category Technical Managers. The Grocery category was reviewed with Technical Manager (VJ). Suppliers are required to complete a self-audit questionnaire. The questionnaires are reviewed, and suppliers are risk assessed based upon whether 3rd party certification is held, product and business exposure risk. Dependent upon the risk, suppliers are audited by the Brakes Technical Management team. All suppliers receive a copy of Brakes terms and conditions, which includes a warranty statement.

Reviewed:

Company documented procedure for supplier approval and monitoring: 6FHJKP is in the form of a flow chart process. Exceptions must be authorised by the Brakes Technical Director.

The following was reviewed:

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You, Yo Fruit Products.

On-going supplier approval system is based on complaint levels and managed by the category technical manager responsible and the technical team

**N/A Clauses**

No.	Justification

## 10. Requirements for the purchasing and management of a wholesale own label products and Wholesaler exclusive brands

The Head Office is the central location for the management of suppliers and products and supplier approval for Brakes branded products is managed by the Technical team to include Category Technical Manager & Category Technologists. Suppliers must hold a valid third part GFSI certificate equivalent to a BRC Food version 8, grade A or B. Suppliers and products are risk rated to determine visit frequency by the Brakes technical team;

- Score 0-20 - Low Risk, visit every 5 years
- Score 20-45 - Medium Risk – visit every 3 years
- Score 45+ - High Risk – Annual

Suppliers complete a product specification on line using Brakes Assure, this is submitted for approval before supply can commence, suppliers have to comply with the Brakes Finished Product Standards covering process checks i.e. metal detection, chemical standards, micro standards, packaging and cooking info.

The specification includes various sections including product safety, ingredient declarations, allergen summary and microbiological standards. Regular category review meetings are held to agree priorities, review supplier / product performance and approval / de-listing of suppliers. Product specifications are reviewed every three years, or sooner if there is a change.

New products / suppliers are managed by the Merchandising Team which includes NPD team members and Category technical managers. The NPD manager will liaise with the supplier to generate a feasibility study and produce samples, once approved the product/supplier will move through the NPD gated process. The Technical Manager for the category will get involved at the point of

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product specification generation and product safety/allergen review and final artwork approval. Artwork is managed by an external agency; all art work is included onto Brakes Assure including the final sign off.

Product inspection and analysis is primarily conducted by the suppliers with results reviewed by the Technical Manager, however when needed the business uses an external UKAS accredited laboratory to conduct product analysis.

The whole supplier approval process was explained in great detail by the Grocery Technical Manager (VJ), Grocery Category Technical Manager and involves working with sites in detail, first products runs, site audits and a full approval system.

Supplier Site Approval – Own Brand Procedure pre-requisites are:

- BRC Grade A or B
- BRC Hygiene Std for Packaging Suppliers
- IFS Higher Level
- Alternative GFSI std

Reviewed: Greencore Selby BRCGS site code 2146681, Grade A+, exp. 07.11.2019 & Soufett Alimentaire BRCGS site code 2123941, exp 07.08.2019.

Brakes TACCP & VACCP procedures includes the following along with mitigation factors documented within risk assessments:

- Economically motivated adulteration for personal gain
- Malicious contamination, with materials / objects or sabotage of the supply chain leading to food issues, ill health or death
- Misuse, extortion, sabotage and espionage of food / drink products for terrorist or criminal purposes
- Malicious tampering by a third party.
- All forms of fraud, to include substitutions by colleagues and substitutions by third parties.

All Brakes approved suppliers have to be BRC / GFSI equivalent approved.

Risk assessment in place for each category group as well as specific products and covers the requirements of the standard.

Horizon scanning is conducted through, Food Industry Intelligence Network and FERA Science Ltd, this information is used to update the risk assessments by the Brakes Compliance Manager.

VACCP risk assessment has been conducted in conjunction with the TACCP and regards product integrity issues including fraud (including fraudulent claims). Suppliers are challenged to provide assurances for substitution of fraud. High risk products are subject to Brakes annual surveillance programme, every month through Eurofins laboratory and Food Forensics. The testing schedule is according to risk and is managed by the Head of Technical Food Safety (BM), the following testing is undertaken at set times of the year covering; meat content, species testing, fat / collagen verification, product origin where claims are being made using Isotope testing, pesticides and micro levels in foods.

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The NPD process was reviewed for the Grocery category with different tabs following gateway process and checks, new ingredients required, depot launch day, supplier shelf life trials and validations are based around existing products and historical evidence. The following process was reviewed for Long grain rice, spec number 18528 & Goan Curry paste. The traceability of all own brand products is maintained through the Brakes Assure Specification system which identifies the traceability system as being the lot code and durability codes of all products being supplied into the depots. The company last challenged the traceability system 14.06.2019 Blueberry muffin, Batch L9072. Full documentation is maintained on the surveillance programme database with the company requiring a list of supporting documentation to be completed and sent back. The trace was completed within the 4-hours timescale. Desk top traceability tests are conducted monthly by the technical team to include products with preserved identities.

A product recall procedure is in place which is tested at least annually by head office (usually during actual product recalls). Incident management and crisis management procedure is comprehensive and details out of hours contacts. The manual contains complete information to deal with emergency situations, procedures for escalation of incident plus team responsibilities.

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N/A Clauses	
No.	Justification

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## CONTRACTED SERVICES MODULES (ALL SERVICES)

### 11. Contractual Arrangements

#### Summary

#### N/A Clauses

No.	Justification

### 12. Product Inspection

#### Summary

#### N/A Clauses

No.	Justification

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### 13. Contract Packing (Repacking, Assembly Packing)

#### Summary

#### N/A Clauses

No.	Justification

### 14. Quality Control Inspections

#### Summary

#### N/A Clauses

No.	Justification

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## 15. Contract chilling/freezing/tempering/defrost and high-pressure process operations

### Summary

#### N/A Clauses

No.

Justification


## 16. Contact Cleaning of baskets, roll cages and other distribution containers

### Summary

#### N/A Clauses

No.

Justification


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## 17. Waste recovery and recycling

### Summary

### N/A Clauses

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