A  **Purpose**
Supplier approval ensures that suppliers of raw materials, services and outsourced processing and packaging meet acceptable standards of food safety, legality, quality & authenticity; service and ethical trading. The ongoing monitoring of these suppliers ensures that legal and contractual arrangements are met in accordance with any agreed standard, specification, contract or service schedule.

B  **Scope**
This procedure is applicable to suppliers of raw materials, services, outsourced processing and packing to the following Symingtons sites:
- Dartmouth Way
- Old Run Road
- Low Moor
- Cross Green
- Goldthorpe

Symingtons sites not listed above will operate their own supplier approval and performance monitoring procedures.

C  **Responsibility**
The responsibilities of the persons named below are:
Compliance Manager:
- Ensure he currency of this procedure with regards to legislation, certification standards and customer codes of practice
- Ensure persons with responsibility within this procedure are adequately trained in its requirements
- Verify compliance to this procedure
Group Supplier Assurance Manager:
- Implement and maintain the requirements of this procedure for ingredient, service 1 and outsourced processing & packaging suppliers
Packaging Purchasing Manager:
- Implement and maintain the requirements of this procedure for packaging suppliers
Area Managers at Operating Sites:
- Implement and maintain the requirements of this procedure for service 2 suppliers

D  **Requirements**
1  **General**
1.1 The following types of supplier will need to be approved:
   a  Raw Material
      i  Ingredient
      ii  Packaging
   b  Service
      i  Service 1
      ii  Service 2
   c  Outsourced Processing and Packaging
      i  Co-process or co-packer (sub-contracted)
      ii  Bought in Goods
1.2 For the purposes of supplier approval, packaging is further broken down into the following sub-types:
   a Primary 1
      i Food contact packaging with or without labelling information
   b Primary 2
      i Non-food contact packaging with labelling
   c Secondary
      i Packaging used to collate SKU’s into retail units
   d Tertiary (Transport)
      i Packaging used to collate retail units into transport units

1.3 For the purposes of supplier approval service 1 is defined as:
   a Those services that are employed by group arrangement and can have a direct impact on food safety, legality or quality.
   b Examples but not limited to: Food transport, food storage, agency staff provider, external laboratory, laundry, pest control provider, waste management, agent or broker.

1.4 For the purpose of supplier approval service 2 is defined as:
   a Those services that are employed by a site arrangement and can have a direct impact on food safety, legality or quality; OR
   b Those services that are employed by group arrangement and have an indirect or no impact on food safety, legality or quality.
   c Examples but not limited to: Catering provider, contract cleaners, calibration provider, equipment servicing.

1.5 Approval needs to occur before purchases can be made from a supplier.

1.6 Approval of suppliers of ingredients, packaging, service 1 and outsourced processing and packaging is done at the suppliers manufacturing site level, not at a supplier group level.

1.7 Approval of suppliers of service 2 is done at a supplier group level.

2 Approving a supplier

2.1 It is the responsibility of the relevant manager nominated above to ensure that when required, suppliers are approved correctly before goods or services are purchased.

2.2 Notification of approved or unapproved suppliers is done through the communication of the Approved Supplier List.

2.3 Where recognised certification standards exist, then this is preferred to conducting a Symingtons Approval Audit. Where there is not a recognised certification standard, then a Symingtons Approval Audit, where specified, should take place.

2.4 Approval requirements for:
   a Ingredients
      i A satisfactorily completed SAQ; AND
ii Recognised Certification; OR
iii Symingtons Approval Audit; AND
iv Supplier Risk Rating (may include Symingtons Approval Audit if high risk).
v A specific requirement for M&S A list ingredient suppliers is to hold a copy of the A List audit on file.

b Packaging: Primary 1
i Satisfactory SAQ; AND
ii Recognised Certification; OR
iii Symingtons Approval Audit; AND
iv Supplier Risk Rating (may include Symingtons Approval Audit if the Food Safety Risk is high).

c Packaging: Primary 2
i Satisfactory SAQ; AND
ii Recognised Certification; OR
iii Symingtons Approval Audit; AND
iv Supplier Risk Rating (may include Symingtons Approval Audit if the Food Safety Risk is high)

d Packaging: Secondary & Tertiary
i Satisfactory SAQ; AND
ii Supplier Risk Rating (may include Symingtons Approval Audit if the Food Safety Risk is high)

e Service 1
i Satisfactory SAQ; AND
ii Recognised Certification; OR
iii Symingtons Approval Audit; AND
iv Supplier Risk Rating.

f Service 2
i Contract; OR
ii Service Schedule; OR
iii Service specification; AND
iv In use assessment.
   • Example: A contract cleaner would have their work inspected after completing it to ensure it is to the agreed standard. A calibration certificate would be checked and signed by a company representative.

g Outsourced Processing or Packaging
i A satisfactorily completed SAQ; AND
ii BRC Certification or GFSI equivalent; OR
iii Symingtons Approval Audit; AND
iv Supplier Risk Rating (may include Symingtons Approval Audit if the Food Safety Risk is high)

h Agents and Brokers
For ingredients and packaging suppliers the site of manufacture or packing or for bulk commodity products the consolidation place of the raw material must be established. The Supplier Approval Process to be followed is the same as that for a direct supplier. It is the site of manufacture, packing or consolidation that will be approved unless the Agent or Broker is certified to the BRC Global Standard for Agents and Brokers.

Recognised Certification

- Ingredients / Outsourced Processing and Packing
  - BRC Global Standard for Food Safety
  - FSSC 22000
  - IFS Food Standard
  - SQF

- Packaging: Primary 1 & 2
  - BRC /IoP Global Standard
  - ISO 9000 (Primary 2 only)

- Service 1
  - External Laboratories
    - UKAS or International equivalent
    - Tesco & M&S approved
  - Warehousing / Transport
    - BRC Global Standard for Storage & Distribution

Extra Requirements for Suppliers

- Ingredients
  - Where a new ingredient contains palm oil or a derivative then the supplier should be RSPO certified. Exceptions can only be made if ingredients are for private label use but a commitment to move to RSPO certification needs to be in place.

- Pest Control
  - Member of BPCA

- Agency Staff Provider
  - Gangmaster licence where appropriate
  - Symingtons Staff Agency Audit

Symington’s sites that supply other Symington’s sites are exempted from SAQ, Risk Assessment and monitoring requirements.

Certification Reports

- Where certification to a recognised standard is used as part of the approval process, then the report should be reviewed.

- The audit result, number and type of non-conformances will be used in the supplier risk assessment.

Approval Records

- Documents used to approve a supplier must be kept on the Matspec drive to demonstrate compliance to this procedure.
ii The relevant dates from these documents should be entered into the relevant supplier tracker to enable the timely management of ongoing approvals.

m Supplier Assessment Questionnaire (SAQ)
   i The SAQ contains the following areas and is generic to all current suppliers:
      • General
      • Ethics
      • Health & Safety
      • Environment
      • Product Quality
   ii The SAQ should be reviewed and answers used in the risk assessment.

n Symingtons Approval Audits
   i Symingtons Approval Audits will be conducted by suitably competent Symingtons Technical staff or other suitably competent auditors appointed by the company. Approval audits will encompass the following areas:
      • Management commitment
      • HACCP / Risk Assessment
      • Quality Management Systems
      • Environmental Standards
      • Material Control
      • Process Control
      • Personnel
   ii Any non-conformances raised at an Initial Symingtons Approval Audit must be closed out prior to approval being given.

3 Ongoing approval
3.1 Ongoing approval for all suppliers is based on the maintenance of the initial approval conditions.
   a SAQ’s are valid for 3 years or until there is a significant change at the operating site to plant or processes.
   b Certification to recognised standards is valid until the certificate expiry date.
   c Symingtons Approval Audits are valid for one year from the initial completion date and then roll annually.

3.2 Non-conformances raised at Ongoing Approval Audits should be closed out within one calendar month of the report being issued. Reports should be issued to suppliers within 7 days of the audit.

3.3 Ongoing approval documentation / requirements should be planned in advance. The aim is to ensure no breaks in approval process.

3.4 If a critical non-compliance has been raised relating to potential food safety, quality or legality incidents, this may result in production being suspended until the issue is rectified and Symington’s products being quarantined or withdrawn from sale. The supply agreement may be reviewed in line with the terms and conditions detailed in the supplier contract by the relevant persons.

4 Supplier risk rating
4.1 Suppliers are risk assessed in the following areas:
   a Food Safety Risk
   b Ethical Sourcing
   c Commercial Risk

4.2 This information is used to decide on the overall supplier risk. The highest rating in the above categories is used to define the overall risk rating.

4.3 Food Safety Risk is further broken down into the following areas:
   a Certification or Symingtons Approval Audit Status
   b Raw Material or Finished Product Micro Risk Rating
   c Raw Material or Finished Product Intended Use

4.4 The Food Safety Risk is calculated in the following way:
   a The score for each section is added together to give a total.
      i Certification or Symingtons Approval Audit:
         • Grade A or no majors and <10 minor NC’s = 1 (Low)
         • Grade B or 1-3 majors and / or <20 minors = 2 (Medium)
         • Other = 3 (High)
      ii Raw Material or Finished Product Micro Risk Rating (pick the worst case scenario score for suppliers of multiple items)
         • Item treated with UHT process or equivalent = 1 (Low)
         • Item treated with a 70°C for minutes or equivalent = 2 (Medium)
         • Other = 3 (High)
      iii Raw Material or Finished Product Intended Use (pick the worst case scenario score for suppliers of multiple items)
         • Cooked / secondary / tertiary packaging / Non-food= 1 (Low)
         • Hot reconstitute or primary 1 / hot eat out of = 2 (Medium)
         • RTE or cold eat out of = 3 (High)
   b If the total is 3 or 4 then the risk is low. If the score is 5-6 then the risk is medium. If the score is 7+ then the risk is high.

4.5 Ethical Risk is further broken down into the following areas:
   a Risk rating of the country of origin or manufacture
   b Certification, registration or membership status

4.6 The Ethical Risk is calculated in the following way:
   a The score for each section is added together to give a total.
      i Risk rating of the country of origin or manufacture
         • Europe, North America, Australia, New Zealand = 1 (Low)
         • Rest of World = 3 (High)
      ii Certification, registration or membership status
         • ETI Audit, SA8000, ISO26000 = 1 (Low)
         • SEDEX self-audit and shared = 2 (Medium)
4.7 Commercial Risk
   a Purchasing fill out the required details in this section. The calculation of risk in this area is not included in this procedure deliberately but is controlled by purchasing.

4.8 Overall Risk Rating
   a The overall risk rating (low, medium or high risk) will determine the frequency of monitoring activity.
      i Low risk: Annual supplier monitoring
      ii Medium risk: 6 monthly supplier monitoring
      iii High risk: 3 monthly monitoring

5 Approved supplier list
5.1 The Approved Supplier List will be updated when new suppliers are added or when current suppliers change risk rating or are de-listed.

5.2 Agents and brokers will not appear on the service 1 list but instead on the list of the raw material they provide.

5.3 The list should be shared with all operating sites and functions to ensure unapproved suppliers are not used.

5.4 Each site should maintain its own list of service 2 suppliers.

6 Supplier Monitoring
6.1 A schedule for supplier monitoring will be drawn up to ensure that monitoring activities are spread as evenly as possible over the year.

6.2 An inter-departmental review meeting will be held every 3 months. Suppliers will be reviewed according to
   a Risk
   b New suppliers will be reviewed after 3 months of supply

6.3 The content of each supplier review will focus in on exceptions raised during the period. These will include but not limited to:
   a Recalls / EPW's
   b Quality incidents
   c Complaints
   d Quality issues
   e Service

6.4 Supplier review notes should be prepared in advance so they can be circulated. The review can then focus on what to do different rather than discussing the information. A pro-forma will be used to ensure consistency of information.

7 Exceptions
7.1 Should there be an issue with a current supplier (Ex. serious product incident, loss of approval certification) and there is a business critical need to source from an alternative new supplier, the new supplier will be assessed as detailed in section D2 prior to commencement of supply. The Supplier Approval Process is the same regardless of the need to use alternative suppliers or any other exceptions that should arise. Exceptions include where raw material suppliers are prescribed by a customer; where information for effective supplier approval is not available and instead product testing is used to verify product safety, legality, quality and authenticity.