

APPROVED SUPPLIER PROGRAM CHOOSING SUPPLIERS

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The first level of control in the Supplier Product Safety Assurance is the Supplier Program. This involves picking the right suppliers.

Ensure that the raw materials, services and other materials received from suppliers are safe. Using approved suppliers is a big first step toward this.

Choosing a supplier that can deliver a safe product should be the goal. Consider the following guidelines when selecting and keeping suppliers:

- Ask suppliers what type of product safety systems they have in place.
- Facilities with ISO, BRC systems in place or certified against any other quality Health Safety and Quality system.
- Find out whether suppliers are manufacturers or wholesale warehouses.
- Find out whether they receive raw materials, products and services from licensed and dependable sources.

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Supplier Approval

With a view to ensure the highest standard of product protection, La Sentinelle Group has established an “Approved Supplier Program” which clearly defines the process by which a supplier becomes an approved supplier of raw materials to La Sentinelle Group.

The product safety measures in place at the raw material supplier’s plant and the quality of the product supplied, including the country of origin of the supplier are among the major approval criteria. Product safety measures include safety audits performed at the supplier’s facility containing the minimum elements expected in a product safety audit such as:

- The Quality Assurance contact
- Program for the control of non-conforming ingredients and products
- The recall program.

The program also establishes;

- How suppliers’ performance will be monitored and tracked
- The corrective actions for supplier performance problems
- An up to date list of approved suppliers’ and
- Criteria for disqualification of a supplier.

The supplier approval process starts by sending La Sentinelle Group Supplier approval Questionnaire to potential suppliers. The potential suppliers are requested to fill in the questionnaire. How the questions are answered will help to determine if a supplier can meet the facility’s product safety requirements.

After the initial assessment, it is useful to do formal, written and/or visual evaluations. These evaluations are obtained in a variety of ways.

- Make sure that documents are provided by the supplier to confirm product safety. Example include Certificates of Analysis and Letters.
- Decide what actions will be taken if a supplier does not meet requirements (e.g.

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requests for corrective action).

- To confirm the product safety programs of potential suppliers, it is the practice to visit the supplier's facility for all locals. For all foreign suppliers approval is done based on information provided in the questionnaire.

Approved Supplier List

Once suppliers are decided on, La Sentinelle Group set up an Approved Supplier List. This list will change as suppliers are added or removed and depending on the supplier's performance.

The Approved Supplier List includes:

- What product(s) the supplier is approved for;
- Whether the product is supplied from a wholesaler including the name of the manufacturer, address, and contact information;
- Details of the supplier name and individual contact information. Get an emergency contact in case of recall;
- Date of approval, and date the supplier started working with the contracting facility; and
- Date and signature of person(s) in the contracting facility responsible for this list.
- The facility's name or code for the product being purchased.
- Supplier code number and an explanation of the lot code of the incoming materials.

La Sentinelle Group enter all this information as soon as the supplier is approved. The list is updated each time a supplier is added or dropped and is systematically reviewed at least once a year to make sure that all information is up-to-date.

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La Sentinelle Group make sure that old versions of this list are kept and are easy to find. That way, if there's a problem or recall related to any raw materials it's possible to find out who supplied them. The supplier can then be contacted.

EVALUATING SUPPLIERS

La Sentinelle Group has procedures to check how well supplier controls are working. The Supplier Product Safety Assurance is verified or checked by knowledgeable staff. Verification points include:

- Inspection of incoming materials;
- On-site audits of suppliers;

Supplier Audit

La Sentinelle Group use supplier audits to confirm the effectiveness of supplier product safety systems.

In the supplier audit, the supplier's facility is visited by our auditors.

The supplier audit confirms:

Management Commitment – Make sure that the supplier's plant manager(s) and corporate management encourage and support attention to product safety.

Fundamentals – Check that the supplier's facility and equipment are well maintained. Make sure they allow for sanitary operations and have a well-documented plant and equipment sanitation program. Look to see that actions and records show all programs and SOPs are followed.

Confirm that all of the following lead to safe, quality production:

- Pest control;
- Chemical control;
- Personnel training;
- Material handling and storage; -

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- Recall; and
- Maintenance programs.
- **Manufacturing Quality Program** – Where applicable, confirm that the supplier has a program to inspect or test the quality of finished products.
- **Regulatory Requirements** – Check that all required regulations are followed. Also ensure that there's a way to review the corrective actions taken when these regulations haven't been followed.

CORRECTIVE ACTIONS

Another part of the Supplier Product Safety Assurance is a Supplier Corrective Action Request (SCAR). This is used when evaluations have been done, but the supplier still isn't meeting requirements. This non-conformance information is sent back to the supplier and they are then required to investigate and find the cause of the deviation or problem.

La Sentinelle Group get the supplier to provide documents showing that the problem was found and corrected. These documents should prove that steps were taken to prevent the problem from happening again. Documents may include inspection checklists, operator training records or a change to the process.

The Supplier Corrective Action Request ensures that there is a way to provide feedback when supplier performance is below standards.

Every time a supplier is given a SCAR, La Sentinelle Group record it in the facility's Supplier Corrective Action Log. A Supplier Corrective Action Log confirms that the facility follows up on issues about supplied products. It also allows the facility to track any continuing problems in follow-up with the supplier in question.

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DISQUALIFICATION CRITERIA

Several reasons why a supplier may be disapproved.

- Failed a scheduled audit or product safety assessment.
- Unacceptable result from raw materials verification.
- Refusal to participate in audit program.
- Country of origin is faced with major health and sanitary problems. (Epidemic)

Once a supplier disapproved it cannot continue to supply until the issue is resolved and the supplier is reapproved.