

## PRODUCT SECURITY PROGRAM

### Introduction

CBV/PR/DOC/6.6-00

At La Sentinelle Group, every measure is taken to ensure that the food packaging product manufactured is of the highest quality.

With a view to ensure the security of the products manufactured by the company, the Management of La Sentinelle Group has developed and put in place security procedures at all level of the process, from the point of receiving raw materials from suppliers, to the production of the product at our plant, up to the delivery of the finished product to the customers.

Security measures are also in place to prevent tampering at any level that could result into the contamination of the product and eventually pose threat to the health of the consumers.

The security procedures are spelt out in the Product Security Program that addresses such aspects as the;

- Management of product security,
- Physical facility,
- Employees,
- Computer systems,
- Raw materials and packaging,
- Operations (security of Water and Air),
- Finished products,
- Security strategies and
- Evaluation

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### Management of product security

- La Sentinelle Group employs trained security officers to assure security at the premises.
- A product security team comprising of the Heads of Production Departments, the Security personnel, Heads of IT Unit, Stores, Procurement and of the Health, Safety & Quality Unit is responsible for ensuring product security at the company.
- All operators working in the production sections are informed about the safety aspects involved in the production of the food packaging products before being employed to work at the production plant.
- Management at La Sentinelle Group encourages all staff to be alert to any signs of tampering with product or equipment, other unusual situations, or areas that may be vulnerable to tampering and to report same. Any suspicious activity reported is immediately investigated and necessary dissuasive measures are taken.
- Heads of Departments/ Security personnel are required to ensure appropriate level of supervision over all employees, including cleaning and maintenance staff, contract workers, data entry and computer support staff, and especially new employees and also conduct daily security checks of the premises for signs of tampering with product or equipment, other unusual situations, or areas that may be vulnerable to tampering.

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### Physical Facility

- Security Officers employed at the company have the responsibility to record and check all incoming and outgoing vehicles.
- Any suspicious vehicle entering or leaving the premises is subject to a thorough verification at the security point prior to entering or leaving the premises.
- Inappropriate or unusual items or activity noted are immediately reported to the Management for necessary enquiry and appropriate actions.
- Entry into the establishment is only possible at either the security point or the reception and checking in and out procedures such as proof of identity and reason for the visit are verified before giving access. A visitors' badge is issued to all visitors and collected upon departure.
- Access to the production, storage areas and the locker rooms to visitors is subject to stricter control. All visitors should be accompanied by a senior staff, unless they have been otherwise specifically authorized.
- Storage of hazardous chemicals is done in separate stores that comply with the safety requirements of the Government Fire and Rescue service.
- These control procedures apply to every visitor, including contractors, supplier representatives, truck drivers, customers, couriers, third-party auditors, regulators, reporters, etc.
- The premises of La Sentinelle Group are under video surveillance 24/7 wherein all movements within the security areas of the premises are recorded.
- The entire perimeter of the premises' boundaries is fenced with electric barriers. Adequate interior and exterior lightings, including emergency lighting, for in case of power cut or fire situation are provided throughout the plant.

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### Employees

- Recruitment of employees to work at La Sentinelle Group is done following established procedures that include a Pre-hiring screening where the applicant's work references, addresses, phone numbers and character certificate are obtained and verified at the interview stage prior to selecting for employment. The same criteria apply for the employment of any employee, to the extent possible, including seasonal, temporary and contract employees.
- Every employee working at the company is issued with a contract of employment that clearly defines his job specifications and other conditions of work such as the hours of work at the different shifts, remuneration, discipline and compliance to health, safety and security regulations in place amongst others.
- The Management at La Sentinelle Group is much concerned about the welfare of its employees. Appropriate washing facilities and rest rooms with individual lockers have been provided for employees so as to enable them to keep their personal items. No personal items such as clothing, jewellery and lunch are allowed to be taken into the production floor.
- A mess room is also provided for the use of all the employees, where lockers have been provided to keep their foods.

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### Computer systems

At La Sentinelle Group the IT department is responsible to manage all IT related functions.

- Access to the IT department is restricted to the IT staff only.
- Protocols have been established that restricts access to computer process control systems and critical data systems to those with appropriate clearance (e.g. using passwords, firewalls)
- Procedures also exist to deny computer access to past employees immediately upon voluntary or involuntary termination.
- The company has established system of traceability of computer transactions.
- Procedures for reviewing the adequacy of procedures for backing up critical computer-based data systems is in place as well for the validation of the computer security system.

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### Raw materials and packaging

La Sentinelle Group has established suppliers for its raw materials.

- All raw materials are purchased from approved suppliers only.
- The raw materials are received in locked and sealed vehicles/containers.
- The seal number of any received item is recorded upon receipt for records and verification purpose.
- A reconciliation of the amount of raw materials received with the amount ordered and the amount listed on the invoice and shipping documents, taking into account any sampling performed prior to receipt is always done on receiving an order.
- Supervising of off-loading of incoming raw material, packaging, Labels, and product returns is done by the Store in charge in the presence of a security staff.
- Any evidence of tampering or counterfeiting is immediately reported to the Management for appropriate investigation.
- Procedures have been put in place to keep track of incoming raw material, packaging, labels, rework products, and product returns.

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### Operations

At La Sentinelle Group;

- Water used for the production is stored in water tanks, which is thereafter supplied to the water points throughout the factory.
- Separate water tanks are available for supply of water to the firefighting systems.
- A water filter has been fitted at the inlet of every water tank installed at the factory to minimize risks of entry of impurities into the water tank.
- The water filter is regularly replaced as per manufacturer's recommendations.
- A water quality test is carried out twice yearly to check the quality of the water. Appropriate measures are taken to remedy any non-conformity reported.
- The air inside the plant is either natural air or artificially cooled air by air conditioning systems.
- The air conditioning apparatus/system installed at the factory is regularly serviced to maintain in good working condition so as not to maintain the quality of the air.

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### Finished Products

La Sentinelle Group has established procedures to;

- Keeping track of finished products.
- Investigating into missing or extra stock or other irregularities outside a predetermined normal range of variation.
- Performing random inspection of storage facilities, vehicles, and vessels.
- Ensure all outgoing finished products delivery vehicles are locked and /or sealed before leaving the company premises. Appropriate entries to record lock / seal is recorded and the seal number is provided to the consignee.

### Security Strategies

- At La Sentinelle Group, procedures have been established to deal with emergency situations such as fire, riot, flood, Tsunami, cyclone, bomb threat and other sort of attacks that could arise at the company and that could represent threat for the security of the occupants and the property.
- Regular fire simulation drills are organized by the security team with the collaboration of the Management to get employees acquainted to the emergency procedures for a safe evacuation of the premises.
- A handful number of employees from both the administration and the production units have been trained in emergency evacuation procedures. Such training, including the drill is organized regularly every year.
- A list of emergency contact numbers, which include emergency services numbers, is affixed in the premises and the security office.

### Evaluation:

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- La Sentinelle Group will undertake to annually review and test the effectiveness of the security strategies established at the company. Such reviews may consist in conducting self-audit exercises and mock exercises to challenge the system and take appropriate measures to update and improve the systems.
- The work of the security team will be assessed to see if they are doing an adequate job.
- Yearly security audits at all production facilities and warehouses will be carried out.
- As per the security procedures, request will be made to our suppliers to have a written security procedure.

Reviewed on September 2016