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Title: LC 3rd Party Drop Ship Food Safety and Quality Procedure

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1 PURPOSE

To specify the minimum requirements for business entities distributing Starbucks products (referred to as “distributor(s)” or “company” throughout) and to ensure that distributors consistently store and deliver products which are safe and legally compliant with all applicable codes, regulations and conform to agreed quality specifications.

2 SCOPE

This document applies to 3rd Party Distribution Centers (also referred to as “dropship” sites) serving Starbucks Licensees in North America.

3 TERMS & DEFINITIONS

Term	Definition
GFSI	Global Food Safety Initiative
TCS	Time/Temperature Controlled for Safety
LC	Licensed Coffeehouse



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4 ROLES & RESPONSIBILITIES

Role	Responsibility
Supplier Quality Management Team	Compliance with all aspects of this document, including prompt and, where appropriate, immediate response to nonconformities. Create the tools for Supervisors and Leads to build food safety into their routines.
Supplier Corporate Leadership	Provide timely and appropriate resources to mitigate food safety risk wherever possible. Create a culture that demands and recognizes food safety leaders throughout their company.
Starbucks SQPS Category SME	Assess and verify supplier conformance to the requirements in this document. Provide clear, concise information before, during, and after conducting an audit using this Standard.
Starbucks Corporate Leadership	Review and approve the content of this document, including the associated Audit Checklist and Guidance Tool. Recognize supplier successes in the context of food safety and quality and hold suppliers accountable for doing better.

5 PROCEDURE REQUIREMENTS

5.1 Distribution Facility Requirements

Starbucks will accept all commonly recognized GFSI distributor certifications and will consider that distributors holding such certification to meet Starbucks minimum expectations. If a GFSI certification is not held then the following minimum requirements must be met.

5.2 Distribution Facility Requirements

Starbucks expects that all distribution facilities storing and/or delivering Starbucks branded products, Starbucks implied products (i.e. with no brand identification) or custom-made products, will be certified to a GFSI benchmarked scheme or locally recognized benchmarked scheme (please contact your Starbucks LC Representative for approval).



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5.2.1 Distribution facilities storing and transporting Starbucks branded products, Starbucks implied products (i.e. with no brand identification) or custom-made products that are not certified to a GFSI or locally recognized benchmarked scheme by an accredited certification body may be audited, at the distributors' cost, by Starbucks QA, Licensee QA, or an external audit provider designated by Starbucks or Licensee QA.

5.2.2 Starbucks and its service providers shall have access to any distribution facility to inspect and audit the stored products and the transport activities being performed by the distributor, and to ensure compliance with these standards. Such access must be granted within one month of request from Starbucks.

5.3 Management Responsibility

The distributor shall ensure that there is management commitment to provide resources to develop, implement and comply with product safety, legality, and quality according to client agreements and specifications.

5.3.1 Company structure

The distributor shall establish a clear organizational structure, including the associated operating facilities (e.g. independent central warehouse(s), satellite depots and other locations where logistical activities are carried out).

5.3.2 Management Review

Senior management shall ensure that the quality and product safety management system is reviewed at least annually, or as changes occur.

5.4 Product Safety Management

The distributor shall identify and comply with regulatory and customer requirements related to the products and to the product categories.

5.4.1 Product Safety Management

5.4.1.1 The company shall have a designated person for product safety and establish a multi-disciplinary product safety team.

5.4.1.2 The company shall describe the activities performed at the platform and develop a flow diagram, where the sequence of all activities is presented in detail.

5.4.1.3 The company shall cluster the existing products into categories based on the required temperature conditions for storage, the risk related to the form of packaging (packed/unpacked) etc. For each



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category, a hazard analysis should be performed, and measures implemented for the control of the identified hazards.

- 5.4.1.4** The company shall establish a system for monitoring, controlling, and recording the relevant storage conditions (temperature, humidity etc.) on each storage area of the warehouse. The responsible person shall have the appropriate training.
- 5.4.1.5** No preparation, processing or re-work (e.g. sorting, repacking) shall be completed at the facility without approval from Starbucks. The company must contact the Starbucks Vendor Relationship Lead to begin the approval process.

5.5 Documentation Requirements

- 5.5.1** The system for product safety and quality management shall be documented, implemented, and shall be retained.
- 5.5.2** All necessary documents shall be available in their latest version, shall be appropriately authorized, and available to relevant personnel at all times.

5.6 Record Keeping

- 5.6.1** All relevant records, shall be complete, detailed, maintained and shall be available on request. The records shall be securely stored and easily accessible.

5.7 Resource Management

The company shall implement a product safety training program for all employees, including seasonal and temporary workers, in contact with products. Before commencing work, basic product safety training shall take place.

- 5.7.1** Personnel training and information program records shall include:

- 5.7.1.1** Training contents, training frequency (product safety/hygiene at least once per year), list of participants.

5.8 Personnel Hygiene

- 5.8.1** There shall be documented requirements relating to personnel hygiene, and where appropriate, the control of infection. These shall include, as a minimum:

- Hand washing & disinfection;
- Eating & drinking;
- Smoking; and
- Actions to be taken in case of cuts or skin abrasions.

- 5.8.2** The protective clothing for employees and visitors shall be appropriate, dependent on the product and process requirements.



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5.8.3 Where a company employs a third-party service provider (e.g. Storage, Transport), the employees of the service provider shall understand and apply the personnel hygiene requirements of the company.

5.9 Sanitary facilities, equipment for personnel hygiene and staff facilities

5.9.1 The company shall provide staff facilities, which shall be proportional in size and equipped for the number of personnel. Such facilities shall be kept in clean and good condition.

5.9.2 Adequate hand-washing facilities shall be provided in the storage area and/or the associated sanitary areas based on assessment of associated risks.

5.10 Realization of the Service

5.10.1 The requirements which are defined between the contract partners shall be established, reviewed with regard to their acceptability and agreed upon before a supply agreement is concluded. All clauses related to quality and product safety shall be known and communicated to relevant staff and entities.

5.11 Requirements for material handling

5.11.1 The company shall have a procedure to avoid any contamination (also cross-contamination caused by incompatible products in the same transport unit or storage room).

5.11.2 Contamination by emissions, exhaust fumes, smell, foreign bodies, packaging material and any other contaminants shall be avoided.

5.12 Traceability

5.12.1 A traceability system shall be in place and maintained, which is appropriate for the company and the products handled.

5.12.2 The system shall ensure that the goods (incl. quantity) are identifiable within the defined logistical supply chain at all times.

5.12.3 The traceability system shall be tested on a regular basis, at least annually, and each time the traceability system changes.

5.13 Maintenance and Repair

5.13.1 An adequate system of planned maintenance shall be in place, maintained and documented, covering all equipment (incl. transport) that is critical for compliance with product safety and quality requirements.

5.14 Air Conditioning, Cooling, Water, Ice and Compressed Air

5.14.1 Requirements for environmental control (e.g. temperature, humidity) which influence product quality and product safety shall be defined and implemented.



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5.14.2 In case of breakdown of the air conditioning/chilled system and/or in the event of deviations from the target temperature, effective emergency corrective action procedures shall be in place ensuring product safety or quality is not compromised.

5.14.3 Water and ice that comes in direct contact with food and/or food packaging shall be of potable quality and evaluated at appropriate intervals.

5.15 Cleaning and Disinfection:

5.15.1 Cleaning and disinfection schedules shall be established, implemented and documented. These shall specify:

- Responsibilities of staff
- The products used and their intended use
- The areas to be cleaned and/or disinfected
- Objectives of cleaning procedures
- Cleaning frequencies
- Documentation requirements
- Hazard Symbols (if necessary)

5.15.2 The facility exterior shall be clean and in good condition.

5.15.3 Cleaning utensils and chemicals shall be clearly labelled. These shall be stored and used in a way to avoid contamination.

5.16 Storage and Handling

5.16.1 The working environment shall not compromise product safety and/or quality.

5.16.2 The company shall control the risk of glass contamination. In areas where open products are managed, lighting equipment shall be protected by the use of shatter proof lights and installed to minimize the risk of breakage.

5.16.3 The loading area shall be appropriate for its intended use. It shall be constructed in a way that:

- Products are protected from rain
- Accumulation of waste is avoided
- Condensation and formation of mold growth is prevented
- Cleaning can be easily undertaken

5.16.4 The floor, walls and ceilings shall be in good condition.



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5.16.5 Windows, doors, and gates shall be in good condition and shall be kept closed, if not used.

5.16.6 Rack and storage areas (e.g. staging areas, bins) shall be adequately spaced from the walls (minimum 12 inches/30 cm) to allow for inspection of areas for cleanliness, insect, or rodent activity.

5.17 Equipment

5.17.1 All equipment shall be designed for its intended use, maintained, and stored not to pose any product safety or quality risk.

5.18 Pest Monitoring and Control

5.18.1 The company shall have a pest control system in place which is in compliance with local legal requirements and shall have, at a minimum, criteria for:

- The site environment (potential pests)
- The site plan with area for application (bait map)
- Identification of the baits on-site
- Responsibilities (in-house/external)
- Products/agents and their instructions for use and safety
- Frequency of inspections

5.18.2 Following pest control inspections, any resulting recommendations shall be acted upon by both parties and actions shall be documented, including the date when corrective actions were taken. The products used for pest control shall not compromise product safety.

5.18.3 Incoming deliveries shall be checked on arrival for the presence of pests. Any infestation shall be documented, and control measures taken.

5.18.4 Products, equipment, and transportation vehicles shall be stored so as to minimize the risk of pest infestation. Where stored product and/or machines may attract pests, appropriate measures shall be taken to prevent risk of contamination.

5.19 Receipt of Goods and Storage

5.19.1 Procedures for the receipt of goods shall be established, effectively implemented, and communicated to all relevant personnel. These procedures shall include:

5.19.1.1 General checking criteria (e.g. identification of products and vehicle), rules for goods acceptance, goods rejection, and qualified acceptance.



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5.19.1.2 At a minimum, surface temperature of product on incoming vehicles shall be checked and recorded prior to unloading.

5.19.1.3 Non-conformities shall be acted upon and documented. If specific product checks are requested by the customer, they shall be implemented and known by the responsible employees.

5.19.2 Outdoor storage shall be kept to a minimum. Where goods are stored outside, should be ensured that there is no risk of contamination or adverse effect on quality and product safety.

5.19.3 Where pallets are used, these shall be inspected to ensure they are in good condition and shall not compromise product safety.

5.20 Waste Disposal

5.20.1 All current legal requirements for waste disposal shall be met.

5.20.2 Food waste and other waste shall be removed from areas where food and/or sensitive goods are handled and pose a risk to product safety and quality.

5.20.3 Waste collection containers shall be clearly marked and in a proper condition.

5.20.4 Waste treatment and disposal must be adequate and maintained so they do not constitute a source of contamination in areas where food is exposed

5.21 Donations

5.21.1 Notwithstanding any other provision of these terms and conditions, the company may donate eligible food products from its distribution center(s) provided that all of the following requirements are satisfied:

- (a) Compliance with Good Samaritan Food Donation Laws. All donations shall be made in accordance with the Bill Emerson Good Samaritan Food Donation Act, as amended, and all other applicable federal, state, and local laws and regulations. The Parties acknowledge that the Act provides liability protection for good-faith food donations and limits donor liability except in cases of gross negligence or intentional misconduct.
- (b) Food Safety Approval. Prior to any donation, the product proposed for donation must be reviewed and approved in writing by a qualified dropship food safety professional at the company. Such approval shall confirm that the product is suitable for donation, complies with applicable food safety requirements, and meets all standards established under company's food safety program and applicable law.



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(c) Eligible Recipients. Donations may only be made by the company to organizations that:

- (i) are recognized by the Internal Revenue Service as tax-exempt organizations under Section 501(c)(3) of the Internal Revenue Code; and
- (ii) are authorized to receive and distribute donated food in accordance with applicable laws and regulations.

(d) Documentation. Company shall maintain records of each donation, including the recipient organization's name, evidence of current tax-exempt status, the products donated, the date of donation, and the written approval of the qualified dropship food safety professional.

(e) Limitation. No donation shall be made if the qualified dropship food safety professional at the company determines that the product does not meet applicable food safety, quality, or legal requirements for donation.

5.22 Transport Requirements

5.22.1 Product quality, safety and integrity shall be maintained during transport.

5.22.2 Where goods must be transported at defined conditions (e.g. temperature), the conditions inside the vehicle shall be checked before loading and documented to ensure compliance to the specified conditions.

5.22.3 When temperature controlled goods are being stored or transported in containers (e.g. thermal boxes), these containers shall be in good condition (clean, odor free, dry, functional and fit for purpose). Prior to loading of the product in these transport containers, the containers shall be precooled.

5.22.4 Temperature controlled vehicles shall carry suitable on-board temperature monitoring devices, which alert the driver in case of failure. The transporter shall be able to provide on demand such time/temperature data to the customer, if requested for a specific tour.

5.22.5 During transport, the respective permissible load level of transport vehicles, transport units and/or containers shall not be exceeded, in order to maintain a proper air circulation and product safety and quality.

5.22.6 The transport vehicles shall be suitable for the needed transportation (clean, free from odors and have no detectable leaks).

5.22.7 The drivers of the service provider shall know and apply the personnel hygiene requirements.



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5.23 Measurements, Analyses, and Improvements

The Distribution Facility shall implement programs and processes to ensure product safety and quality are controlled and continuously improved.

5.24 Site Inspections

5.24.1 Site inspections shall be planned and carried out involving evaluation of the infrastructure of the site, the operational aspects of personnel hygiene, hygiene of the process, etc.

5.24.1.1 *Any discrepancies found from the site inspections as well as corresponding corrective action shall be recorded. The corrective actions shall be implemented.*

5.25 Calibration, Adjustment and Checking of Measuring and Monitoring Devices

5.25.1 The measurement equipment and devices shall be checked, calibrated and/or verified and/or adjusted at defined intervals.

5.26 Management of Non-conformities and Non-conforming Products

5.26.1 An effective defined procedure shall be in place for the management of all non-conforming products.

5.26.2 The procedure for the management of non-conforming products shall include as a minimum:

5.26.2.1 Procedure for product quarantine (blocking/hold)

5.26.2.2 Events such as fire, flood, or natural disaster

5.26.2.3 Malicious contamination or sabotage

5.26.2.4 Food safety concerns

5.26.2.5 Where products which have been released from the site may be affected by an incident, consideration shall be given to the need to withdraw or recall products.

5.26.2.6 In the event of a withdrawal or recall impacting Starbucks product, Starbucks FSQ/QA and/or Contract Manufacturer (where appropriate) shall be notified immediately of the decision to issue a withdrawal or recall.

5.26.2.7 The company shall have a documented plan and system in place to effectively manage food safety and/or quality incidents and enable the effective withdrawal and recall of products should this be required. This shall include, at a minimum:



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- Guidelines for deciding whether a product needs to be recalled or withdrawn, and the records to be maintained
- Guidance for evaluation of product disposition in the event of a facility shutdown, regulatory violation or product disruption
- Contingency plans for order fulfillment in the event that production is disrupted
- An up-to-date list of the key contacts or reference to the location of such a list; for example, recall management teams, emergency services, suppliers, customers, certification bodies, and regulatory authorities
- Details of external agencies providing advice and support as necessary (for example: specialist laboratories, regulatory authority and legal expertise)
- Communication plan, including provision of information to customer, consumers and regulatory authorities in a timely manner

5.26.3 Procedure shall be capable of being executed at any time. This shall be verified and documented at a defined frequency.

5.26.4 Tests shall be performed at least annually of the product recall and withdrawal procedures to ensure their effective execution. Results of the test shall be:

- Retained;
- Include timings of key activities; and
- Used (along with results from actual recalls) to review the procedure and implement improvements as necessary

5.27 Compliant Handling

5.27.1 A system shall be in place for the management of complaints from authorities and customers.

5.28 Corrective Actions

5.28.1 Corrective actions for issues affecting product safety shall be clearly formulated, documented, and undertaken, as soon as possible, to avoid further occurrence of non-conformity.

6 LEGAL STANDARDS

Independent of these minimum requirements, the distributors shall always comply with then-current applicable laws and regulations, including local codes.

7 RELATED DOCUMENTS



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Document Title	Document Number
N/A	<i>Starbucks Standard Terms and Conditions of Purchase</i>

8 DOCUMENT HISTORY

Revision	Date	Description of Change
0	9/9/2026	Initiated Document