1.0 PURPOSE

This document defines product safety and quality system requirements for Starbucks' Non-Food Suppliers.

2.0 SCOPE

This document applies to:

- Region: Global – Company Owned markets
- Product type: Consumer Products, Retail Packaging, and Furniture
- Brand: Starbucks, Starbucks Reserve

3.0 TERMS and DEFINITIONS

Term	Definition
Consumer Product	Items purchased from suppliers and offered to customers, whether they involve food contact or are non-food items, fall under the category of consumer products. This encompasses products from the serveware, Packaged Goods, and Brewing categories. Excluded from this definition are purchases not overseen by Starbucks Global Procurement or items located behind the bar. The consumer products supply chain generally involves the supplier conducting business with the buyer and the factory responsible for manufacturing the product.
Consumer Product Safety Act	A federal law in the United States that established the Consumer Product Safety Commission (CPSC) to protect the public against unreasonable risks of injury associated with consumer products.
Consumer Product Safety Improvement Act (CPSIA)	A federal law in the United States that established the Consumer Product Safety Commission (CPSC) to protect the public against unreasonable risks of injury associated with consumer products. This law amended CPSA in 2008 to provide CPSC with significant new regulatory and enforcement tools. CPSIA addresses, among other things, lead, phthalates, toy safety, third-party testing and certification, imports, ATVs, civil and

	criminal penalties. It repeals a funding limitation on the number of CPSC commissioners. Visit SaferProducts.gov for more information.
Fair Packaging and Labeling Act (FPLA)	A federal law in the United States that requires manufacturers to provide accurate and meaningful information on product labels, including net quantity, identity of the product, and name and place of business of the manufacturer, packer, or distributor.
Golden samples	Meticulously vetted and approved prototypes or products that serve as the reference standard for quality, performance, and specifications in manufacturing. They serve as a benchmark for comparing subsequent production units, ensuring consistency and uniformity in the final output.
High-risk	High-risk Merchandise items include (but are not limited to): electrically powered products, products specifically geared toward children, products made of glass or ceramic, custom made products, and products carrying the Starbucks brand/logo. High-risk Retail Packaging items include (but are not limited to): Direct Food or Beverage contact that requires assembly for intended use; such as a hot cup and lid; Products with evidence of issues through FDA (or int'l equivalents); Labels with printed information about food content; such as allergens.
Initial Product Certification	The first time an item is tested for compliance with product safety requirements before entering the stream of commerce.
ISO9001	International standard used to evaluate whether a Supplier's Quality Management System is appropriate and effective, while forcing them to identify and implement improvements.
Key Business Review (KBR)	Periodic structured conversations between Starbucks and suppliers about their relationship and performance.
Low risk	Low-risk Merchandise items include (but are not limited to): some items made of stainless steel or plastic and products that are not Starbucks branded. Low-risk Retail Packaging items include (but are not limited to): No food contact, or unintentional food

	contact, e.g. napkin, shoppers, Secondary packaging, such a box used for tea bags that are individually wrapped or cup sleeve.
Management review	A formal process for top management to review an organization's quality management system, assess its effectiveness, and make decisions on improvement actions.
Material Change Testing	Material change is a change that the manufacturer makes to their product's design, to the manufacturing process, or to the source of component parts for the product, which a manufacturer, exercising due care, knows, or should know, could affect the product's ability to comply with the applicable product standards.
Nonconformity and corrective action	A process for identifying and addressing nonconformities (instances where products, services, or processes do not meet established requirements) to prevent their recurrence.
Periodic Testing	Periodic testing means third party testing that must be conducted on the continuing production of consumer products or retail packaging. This testing is in addition to the testing that was conducted when an item was initially tested for certification or when the product was retested and certified following a material change. Periodic testing for consumer products must be performed by a CPSC-accepted third party laboratory.
Product Recall	A product recall is a voluntary action by the firm that marketed the product, or an action requested by a regulatory agency. If a health risk (serious illness, injury or death) has or could occur, a trade or consumer level recall is initiated. Public notification is typically required as is notification of appropriate regulatory authorities. Local country specific regulations and requirements must be reviewed and met. An actual product recall is removing from marketing and distribution channels those products which are adulterated or misbranded to the extent such products are subject to seizure under current policy and guidelines of the FDA, CFIA, CPSC, EU

	directives, Health Canada, or other international regulatory agencies equivalents.
Product Safety Issue	Any non-conformity that may be a safety issue. Examples of this include, but are not limited to: company product or packaging does not meet applicable product specifications or regulations that could result in a safety issue; serious supply chain incident that could result in a safety issue; Level III events identified by the Starbucks Consumer Care Center (CCC); the potential for a recall or withdrawal of products from Starbucks distribution, retail locations, or CPG/foodservice channels.
Production Equivalent	An item that is equal in size, quality, function, etc. to that which will be made during the production run.
Qualified Individual	Someone possessing the requisite expertise, knowledge, training, or experience relevant to the specific field or responsibility in question. This expertise enables them to effectively perform tasks, make informed decisions, and fulfill obligations within their designated role or industry.
QMS	Quality Management System, which is a set of policies, procedures, and processes that an organization uses to ensure that its products or services meet customer requirements and comply with regulations and industry standards.
Quality policy	A statement of an organization's commitment to quality, outlining its objectives for quality management and describing the methods and principles it will use to achieve them.
'Ready-to-use'	'Ready-to-use' refers to items manufactured and packaged within a sterile, controlled, and sanitized environment, that are safe for direct food contact usage.
Risk	Combination of probability of occurrence and severity that results in physical injury or damage to the health of people, or damage to property.
Sample	A representative part or a single item from a larger whole or group especially when presented for inspection or shown as evidence of quality.

Seasonal Products	Items that are only part of the assortment for a season, promotion, or limited time offering.
Specification Sheet	A document that includes a detailed description of work to be done or materials to be used in a project.
SQ&PS	Supply Quality & Product Safety: the team at Starbucks responsible for ownership of product safety and quality.
Starbucks Branded	Includes products that maintain a Starbucks brand name and/or logo (including co-branded products) and Starbucks enterprise brands (Starbucks, SBC, Starbucks Reserve).
Stock Keeping Unit (SKU)	Also, known as Item Number.
Substantiation	To establish by proof or competent evidence.
Substrate	A material which provides the surface on which something is deposited or inscribed.
Test Report	Document that records data obtained from an experiment of evaluation in an organized manner, describes the environmental or operating conditions, and shows the comparison of test results with test objectives.
Toolkits	All suppliers will receive toolkits from the Starbucks QA team annually. These are documents that are split out by substrate and outline Starbucks' QA testing standards and expectations. As the assortments continue to grow and evolve, the supplier will see additional testing and/or substrates added to the documentation packet that they receive. The onus is on the supplier to ensure they read, comprehend, and test their products per the applicable toolkits.
TOP (top of production) sample(s)	The initial sample(s) produced in a manufacturing run that accurately represents the product intended for distribution and commerce, distinct from a 'golden sample' which serves as the benchmark for quality and consistency in subsequent production.
Unfair or deceptive acts or practices (UDAP)	Practices that are likely to cause substantial injury to consumers or that violate established public policies,

	and that are considered illegal by the Federal Trade Commission in the United States.

4.0 Roles and 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 product safety into their routines.
Supplier Corporate Leadership	Provide timely and appropriate resources to mitigate product safety risk wherever possible. Create a culture that demands and recognizes product safety leaders throughout their organization.
Starbucks SQ&PS 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 product safety and quality and hold suppliers accountable for performance.

5.0 REFERENCES / ATTACHMENTS

Document Number	Document Title
Attachment 1	Guidelines for Non-Food Suppliers
N/A https://www.starbucks.com/terms/suppliers-standard-terms-and-conditions/	Starbucks Standard Terms and Conditions of Purchase

	Starbucks Guidelines for Non-Food Suppliers Audit Checklist

6.0 REVISION HISTORY

Revision	Description of Changes
1	Initial Registration in Intelex System. Previous revisions in legacy system.
2	Revised: Purpose, scope, terms, definitions, formatting, spelling, and grammar for accuracy and clarity. Added: Detailed descriptions of roles and responsibilities, a comprehensive table of contents, expanded guidance across all sections, and integrated content sourced from GQR.PRO.93 - Starbucks Merchandise Quality Assurance Expectations.

Contents

- Where the safety or legality of products is based on equipment found to be inaccurate, action shall be taken to ensure at-risk product is not offered for sale. Non-compliant equipment must comply with maintenance requirement of this Standard to prevent accidental use. 38

Attachment 1, Guidelines for Non-Food Suppliers

Introduction

Suppliers requirements:

The Starbucks Coffee Company ("Starbucks") Standards for Non-Food Suppliers are established to clarify the minimum requirements for any business entities ("suppliers") responsible for manufacturing, importing, processing, packing or holding Non-Food product for Starbucks; and to ensure that suppliers consistently deliver products (consumer products, retail packaging, furniture) which are safe and legally compliant with all applicable codes and regulations (Federal, State/Province, Local) in the countries where they are sourced, as well as in countries where the products are intended to be commercialized, and conform to agreed quality specifications.

Independent of the minimum requirements above, suppliers shall always comply with local, state/provincial and federal government regulations and codes. In the unlikely event that local regulations or circumstances are contrary to Starbucks expectations, the supplier shall seek an exception for approval from a Starbucks officer (Vice President Level or higher). Request and response to request shall be documented.

Starbucks recognizes ISO 9001 certification and will consider that non-food suppliers holding a valid certificate from an accredited registration body, relevant to the business engaged with Starbucks, meets Starbucks non-food quality minimum expectations. However, Starbucks reserves the right to audit any supplier to ensure Starbucks expectations are being met, including verification of requirements within this document, which may exceed ISO 9001 expectations.

Compliance assessment:

High-risk non-food manufacturers that are not certified to ISO 9001, will continue with Starbucks current Supply Base Management (SBM) approval and verification program, which may include a questionnaire and facility assessment performed by a Starbucks employee or by a designated external audit provider.

Low-risk non-food suppliers will continue with Starbucks current SBM approval and verification program, which may include a questionnaire, review of third party certification and/or facility assessment performed by a Starbucks employee or by a designated external audit provider.

Evidence of compliance with Starbucks Standards for Non-Food Suppliers may not eliminate Starbucks assessment, but those assessments will primarily focus on Starbucks relevant products and associated processes compliance rather than on Quality Management System (QMS) compliance.

Starbucks assessment frequency and protocol will be determined by the type of products supplied, the supplier certification scheme, grade/level, and by the performance history with Starbucks. Starbucks Supply Quality and Product Safety (SQ&PS) SME reserves the right to request an assessment or audit as they deem necessary.

Supplier's facilities may be audited by a third-party auditor appointed by Starbucks. The audit will assess the Supplier's compliance with Starbucks Non-Food Standards.

The Starbucks Standards for Non-Food Suppliers are subject to the definitive master purchase agreement between the supplier and Starbucks or, if no definitive agreement is in effect, to Starbucks Standard Terms and Conditions of Purchase, which are accessible at http://www.starbucks.com/business/suppliers/standardtermsandconditions ("Agreement"). Without limiting the generality of the terms in the Agreement, the supplier acknowledges and agrees that the following acts or omissions shall constitute a material breach of the Agreement:

1. Failure to implement a quality program that is reasonably satisfactory to Starbucks.
2. The supplier's refusal to grant Starbucks access to the supplier's facilities to conduct audits.
3. The reckless or grossly negligent handling of products by the supplier, its employees, agents, and/or contractors.
4. Willful or intentional misconduct by the supplier, its employees, agents, and/or contractors.
5. The suspension, cancellation, or revocation of necessary registrations, permits, certifications, or licenses in order for the supplier to handle, store, manufacture, and produce products.
6. Failure to notify Starbucks that the supplier has been or is subject to an inspection or investigation by a national, regional, or local regulatory authority.
7. Failure to notify Starbucks of (i) any product safety incident (defined as event that if left uncorrected or if impacted product went into commerce would result in a product safety or regulatory violation) or activity at a facility where Starbucks' products are handled, stored, manufactured, or produced, or (ii) any detection or discovery of product adulteration as defined by compliance with appropriate regulatory requirements (local, state, federal or any other applicable regulatory body), including, but not limited to microbiological, chemical or physical and undisclosed materials.
8. Failure to notify Starbucks in advance of a Public Press Release impacting Starbucks products.
9. Failure to notify Starbucks of any material and adverse findings by the supplier's third-party auditor with respect to the quality programs of any site where Starbucks' products are handled, stored, manufactured, or produced.
10. Failure to undertake remedial measures as mutually agreed upon in a written corrective action plan.

Section 1: Quality Management System and commitment

The supplier shall have a Quality Management System (QMS) which is documented,

implemented, maintained, continually improved, and supported by its senior management. The QMS shall include the following elements:

1.1. Quality policy

1.1.1. The supplier shall have a documented quality policy statement and objectives specifying the extent of the supplier's commitment to consistently produce safe, quality, legal products, compliant with regulatory and industry standards and the specifications of its customers.

The policy shall be signed by the person with overall responsibility for the site.

The quality policy shall be effectively communicated to company employees.

1.1.2. The quality policy shall be associated with clear objectives, targets and measures of success which are monitored and reported at a defined frequency.

1.2. Quality manual and documents

1.2.1. The supplier shall have a documented Quality Management System. The scope should be appropriate to the range of business activities covered, including documented procedures for processes related to product safety and quality.

1.2.2. Documents shall be reviewed and approved by designated, trained personnel.

1.2.3. A master document (or equivalent if using an electronic system) shall identify the current version of documents.

1.2.4. Documents shall be available and current at all locations where they are needed to support the effective execution of operations.

1.2.5. Records shall be genuine, readily available, and complete.

1.2.6. Records shall be completed by operators and verified by a relevant supervisor or relevant employee in an authoritative position.

1.2.1. All records (processes and products) shall be retained for a period commensurate with the expected life of the product, or at minimum 36 months.

1.3. Management responsibility

1.3.1. The supplier shall establish a clear organizational structure, which unambiguously defines and documents the job functions, responsibilities, and reporting relationships of at least those staff whose activities affect safety and quality.

1.3.2. Absence coverage shall be clearly identified for all positions relevant to product safety and quality.

1.3.3. The designated leader for quality shall be independent and report to a manager whose objectives encompass product quality.

1.4. Management commitment and resource management

1.4.1. Senior product safety and quality site management shall be entrusted to individuals who have clearly demonstrated the expertise, education, and/or experience needed to effectively design and implement product safety and quality programs consistent with ISO 9001, regulatory, and customer requirements, including those within this Standard. Documentation supporting senior product safety and quality management competence shall be maintained.

1.4.2. The supplier's senior management shall provide evidence of their commitment to establish, implement, maintain, and improve the QMS.

1.4.3. Senior management shall regularly be trained to relevant quality management topics. Schedules and records shall be available to demonstrate attendance.

1.4.4. Key evidence from senior management to demonstrate commitment may include but is not limited to the following:

- Determining and providing, in a timely manner all the resources, human and financial, needed to implement, maintain, and continuously improve the QMS.
- Engagement of key product safety and quality personnel in prioritization of capital expenditures.
- Senior management with QMS knowledge and involvement into relevant quality activities.

1.5. Management review

1.5.1. The supplier's senior management shall review the QMS at planned intervals, but at a minimum annual frequency, to ensure their continuing suitability, adequacy, and effectiveness. The quality programs shall also be reviewed in the event of any change that impacts product safety or quality. Such a review shall evaluate the need for changes to the QMS, including the quality policy and objectives.

1.5.2. Monitored measures and results associated to the quality policy and its objectives shall be reported to the supplier's senior management at least on a quarterly basis and shall lead to timely, documented actions as well as verification activities to ensure those actions were effective and that issues have been resolved.

1.5.3. The supplier shall have a demonstrable meeting program which enables product safety, legality, and quality issues to be brought to the attention of senior management at least monthly and allows for the resolution of issues requiring immediate action.

1.6 Document control and record retention

1.6.1 The supplier shall have a procedure to manage documents which are part of the QMS. This shall include:

- The method for the identification and authorization of controlled documents.
- A record of the reason for any changes or amendments to documents.
- A system for the replacement of existing documents after an update is made; and
- A process for review and approval by designated and trained personnel

1.6.2 All procedures and work instructions shall be clearly legible, unambiguous, in appropriate languages and sufficiently detailed to enable their correct application by appropriate staff. This shall include the use of photographs, diagrams or other pictorial instructions where written communication alone is not sufficient (if, for example, there are issues of literacy or foreign language).

1.6.3 Documents shall be available and current at all locations where they are needed to support the effective execution of operations.

1.6.4 Records shall be permanent, genuine, readily available, and complete.

1.6.5 All records (processes and products) and test reports shall be retained for a minimum of two years or in compliance with regulatory requirements (whichever is longer). Records pertaining to regulatory and/or marketing requirements shall be retained per those requirements.

1.6.6 The supplier shall store records in a manner which protects against damage, loss or environmental disasters and be available within 24 hours of request.

1.6.7 Documents must be made available when requested by regulatory authorities. Electronic records shall be provided in a commonly used and accessible format.

1.7 Internal and external audit

1.7.1 Internal audits covering the entire facility and all aspects of the QMS shall be scheduled and carried out at a defined frequency. The scope and frequency of the audits shall be established in relation to the risks associated with the activity being audited and previous audit performance. All activities shall be covered at least annually.

1.7.2 A documented inspection program managed by qualified individuals shall be in place at facilities that produce 'ready-to-use' product to ensure the factory environment and equipment meet the necessary criteria for safe food-contact production. The frequency of these inspections shall be based on risk but will be no less than once per month in open product areas. Inspections shall include:

- Hygiene inspections to assess cleaning, personnel, and housekeeping performance.
- Facility inspections to identify risks to product from the building or equipment.
- Facility must define requirements for "appropriately qualified individuals" responsible for conducting internal inspections.

1.7.3 All internal auditors shall be trained in audit techniques. Internal auditors should be independent of the system or process being audited.

1.7.4 Results of internal and external audit shall be documented.

1.7.5 Corrective actions planning and implementation should begin immediately upon the receipt of audit results and evidence must show them to be effective and shall be implemented within the permitted timeframe provided by the auditor.

1.8 Product complaint handling

1.8.1 Suppliers shall have a written procedure for complaint handling. All complaints shall be recorded, investigated and the results of the investigation and root cause of the issue recorded, where sufficient information is provided. Actions appropriate to the seriousness and frequency of the problems identified shall be carried out effectively by appropriately trained staff.

1.8.2 Complaints related to potential product safety shall be monitored continuously. Product safety related complaints shall be investigated within 24 hours of receipt and updates shall be provided to Starbucks SQ&PS regularly, including root cause analysis and corrective actions, as applicable.

1.8.3 Complaint data shall be analyzed for trends and used to implement ongoing improvements to product safety, legality and quality, and to avoid recurrence. This analysis shall be made available to relevant staff and senior management.

1.9 Corrective and preventive action

1.9.1 The supplier shall be able to demonstrate that they use the information from identified failures in the QMS to make necessary corrections and prevent recurrence.

1.9.2 The supplier shall have a documented procedure for handling non- conformances identified within the scope their QMS.

1.9.3 Corrective actions shall be clear, assigned to a suitably competent and authorized person, able to address the immediate issue and prevent recurrence sustainably.

1.9.4 A documented verification shall be in place to ensure that corrective actions are implemented and are effective.

1.10 Traceability

1.10.1 The supplier shall be able to trace all raw material product lots from their supplier through all stages of processing and distribution to their customer and vice versa.

1.10.2 Identification of raw materials, components, packaging, processing aids, work-in process/semi-processed products, partially used materials, finished products, and material pending investigation, shall be adequate to ensure traceability. Lot coding shall be clearly defined.

1.10.3 The supplier shall test the traceability system across the range of product groups to ensure traceability. This shall occur at a predetermined frequency and results shall be retained for inspection. The test shall take place at least annually. Key components required for each of these exercise scenarios include:

- Quantity check or mass balance
- Rework or carryover performed.
- Waste

1.10.4 Traceability exercises shall include forward trace and backward trace from raw material, including packaging, to finished product (accounting for distribution into the Starbucks network).

1.10.5 Traceability exercises should be achievable within 24-48 hours aiming for an accurate identification of product batches with a traceability rate above 95%. When the traceability process extends beyond 48 hours or falls below the set traceability rate:

- Root cause analysis shall be performed.
- Preventive actions shall be identified and completed, and
- The traceability exercise shall be repeated to ensure compliance.

1.11 Management of incidents, product withdrawal and product recall

1.11.1 The supplier shall have a plan and system in place to effectively manage product safety and/or quality incidents and enable the effective withdrawal and recall of products should this be required.

1.11.2 The supplier shall have documented procedures designed to report and effectively manage incidents and potential emergency situations that impact product safety, legality, or quality. This shall include consideration of contingency plans to maintain business continuity. Incidents may include:

- Disruption to key services such as water, energy, transport, staff availability and communications
- Events such as fire, flood or natural disaster
- Malicious contamination or sabotage
- Product safety concerns

1.11.3 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.

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

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

- Identification of key personnel constituting the recall management team, with clearly identified responsibilities.
- 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 production disruption
- Contingency plans for order fulfillment in the event that production is disrupted.
- An up-to-date list of 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 the provision of information to customer, consumers and regulatory authorities in a timely manner.
- Procedure shall be capable of being executed at any time. This shall be verified and documented at a defined frequency.

1.11.5 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.

Section 2: Personnel

The supplier shall define, implement, and document good practices relevant to all personnel, employees, agency staff, contractors, and visitors to ensure that personnel activities are not a source or a vector of product defects.

2.1 Training

2.1.1 All relevant personnel, including temporary staff and contractors, shall be appropriately trained prior to commencing work and adequately supervised throughout the working period. This training will be documented for all relevant operations at a minimum.

2.1.2 Training requirements relevant to employee roles or job responsibilities shall be developed with minimum frequencies for refresher training.

2.1.3 Records of all training shall be available. This shall include, at a minimum:

- The name(s) of the trainee(s) and confirmation of attendance
- The date and duration of the training
- The title or course contents, as appropriate
- The training provider

2.1.4 Activities shall be taken and documented to demonstrate the effectiveness of the training.

2.1.5 Where training is undertaken by third parties on behalf of the supplier, records of the training shall be available.

2.1.6 The supplier shall routinely review the competencies of its staff. As appropriate, it shall provide relevant training. This may be in the form of training, refresher training, coaching, mentoring or on-the-job training.

2.1.7 Senior management at all levels shall regularly be trained to product safety and quality management relevant topics. Schedules and records shall be available to demonstrate attendance.

2.1.8 Where personnel are engaged in activities relating to risk based preventive controls, relevant training and competency assessments shall be in place.

2.1.9 Pest awareness training shall be provided for all employees and sightings by staff shall be reported and documented.

2.1.10 Activities, such as testing, direct observation, or other methods, shall be taken and documented to demonstrate the effectiveness of the training.

Section 3: Facility and Equipment Control

3.1 External facility standards

3.1.1 The facility site shall be of suitable size, location, construction, and design to reduce the risk of contamination and facilitate the production of safe and legal finished products.

3.1.2 The production site shall have all appropriate registrations and/or certifications to conduct business and manufacture product.

3.1.3 External grounds shall be maintained in a clean and orderly manner and shall conform to the requirements in the Pest Control section of this Standard.

3.1.4 Drainage shall be adequate to prevent ingress of water or other contaminants into the facility.

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

3.2 Building infrastructure

3.2.1 The construction of the site, buildings and structure shall be suitable for the intended purpose.

3.2.2 Suitable and sufficient lighting shall be provided for correct operation of processes, and inspection of product.

3.2.3 Adequate ventilation and extraction shall be provided in product storage and processing environments to control condensation or excessive dust.

3.2.4 Walls shall be constructed, finished, and maintained to prevent the accumulation of dirt, minimize condensation, and mold growth, and facilitate cleaning.

3.2.5 Wall/floor junctions shall be designed and maintained to facilitate cleaning. Floors shall be suitable for the intended use and withstand cleaning materials and methods. They shall be impervious and maintained in good repair.

3.2.6 Ceilings and overheads shall be constructed, finished, and maintained to prevent the accumulation of dirt and facilitate cleaning, and be made of a material suitable for the production environment.

3.2.7 Where suspended ceilings or roof voids are present, adequate access to the void shall be provided to facilitate inspection for pest activity, unless the void is fully sealed and designed for permanent placement.

3.2.8 Where there is a risk to product, windows and rooftop ventilation shall be adequately screened and covered to prevent the ingress of pests and any contamination from outside.

3.2.9 Doors shall be maintained in good condition. External doors and dock levelers

shall be close-fitting or adequately sealed to prevent the ingress of environmental concerns or pests.

3.3 ***Pest Control***

3.3.1 The supplier shall either contract the services of a licensed pest control organization or shall have a certified pest control operator on staff, for the regular inspection and treatment of the site to deter and eradicate infestation. Training records and certificates, when applicable, shall be in place to demonstrate their competency.

3.3.2 Qualified pest control activities shall be conducted on at least a monthly basis.

3.3.3 Toxic bait is prohibited for use in the building interior. Any toxic bait stored on the premises must be stored securely, with access to designated individuals only and tracked with an inventory control log.

3.3.4 Pest control documentation and records shall be maintained. This shall include, at a minimum:

- An up-to-date plan of the full site identifying numbered pest control device locations.
- Identification of the baits and/or monitoring devices on site
- Clearly defined responsibilities for site management and for the contractor
- Details of pest control products used, including instructions for their effective use and action to be taken in case of emergencies.
- Any observed pest activity
- Details of pest control treatments undertaken, including quantities and locations applied.
- Trend analysis, recommendations and actions taken to prevent reoccurrence.
- Electric insect light devices and/or pheromone traps shall be correctly located and operational; electric insect electrocuting devices may not be in production areas, storage areas or passages used for movement of raw material, product, equipment, or tools.

3.3.5 An in-depth, documented pest control verification shall be undertaken at a frequency based on risk, but, at minimum, quarterly, by a pest control expert and supplier representative to review the pest control measures in place.

3.3.6 In the event of infestation, or evidence of pest activity, action shall be taken to eliminate the hazard based on predetermined actionable limits. Any potentially affected products should be quarantined in a manner that

adequately protects unaffected product, and subject to the nonconforming product procedure.

3.4 Equipment

3.4.1 All processing equipment shall be suitable for the intended purpose, shall be constructed of appropriate materials, and not pose a risk to product quality or safety.

3.4.2 All manufacturing equipment used to produce products for Starbucks must be adequately maintained, serviced and operable.

3.4.3 The design and placement of equipment shall ensure it can be effectively cleaned and maintained.

3.4.4 Equipment or structures in direct contact with product or over product shall pose no risk to product quality or safety and meet legal requirements, where applicable.

3.5 *Maintenance*

3.5.1 All equipment shall be adequately maintained, serviced, and operated to produce safe products.

3.5.2 A documented system of planned maintenance shall be in place covering all items of equipment which are critical to product safety.

3.5.3 In addition to any planned maintenance program, where there is a risk of product defects arising from equipment damage, the equipment shall be inspected at predetermined intervals, inspection results documented, and appropriate actions taken.

3.5.4 In case of issues, technical support shall be immediately available; for example, a minimum of one maintenance employee on site during production.

3.5.5 Outside contractors and engineers involved in the maintenance or repair activities shall be made aware of, and adhere to, the site standards.

3.5.6 The site shall maintain a spare parts library or ensure that spare parts can be obtained in a timely manner for all equipment which is critical to product safety.

3.5.7 Maintenance and construction activities shall be carried out in a manner to minimize the risk of damage and/or contamination of products.

3.5.8 Lubricating oil and paints shall be suitable for the intended use; food contact, where applicable.

Chemicals used for maintenance activities shall conform to the requirements in the Chemical contaminant control section of this Standard.

3.5.9 Where temporary repairs are made, processes and materials shall be

controlled to ensure the safety or legality of product is not jeopardized. All temporary repairs shall indicate a date and the initials of the individual making the temporary repair. These temporary measures shall be permanently repaired as soon as practical, and within a defined timeline.

3.5.10 Maintenance work shall be followed by a documented clearance procedure that ensures the risk of damage and/or contamination of products has been removed from machinery and equipment. Upon completion of any maintenance work, machinery and equipment shall be cleaned and free from hazards and verified by designated QA personnel before production is resumed.

3.5.11 A system shall be in place to ensure that all parts removed, and all tools used during maintenance are accounted for following completion of maintenance activities.

3.5.12 Inoperable, defective, or inaccurate equipment shall be documented in a maintenance log and tagged (segregated, when possible) to avoid accidental use.

3.6 Chemical contaminant control

3.6.1 Processes shall be in place to manage the use, storage, and handling of chemicals to prevent chemical contamination. These shall include, at a minimum:

- An approved list of chemicals for purchase
- Availability of safety data sheets (SDS; formerly, MSDS) and specifications
- Confirmation of suitability for use in an environment for the products being manufactured.
- The labelling and/or identification of containers of chemicals at all times.
- Segregated and secure storage with restricted access to authorized personnel
- Segregation of food-contact and non-food-contact chemicals
- Chemical inventory records
- Procedures for use by trained personnel only

3.6.2 Where strongly scented or taint-forming materials must be used, e.g., for building work, procedures shall be in place to prevent the risk of product contamination.

3.7 *Storage Facilities*

3.7.1 All facilities used for the storage of raw materials, in-process product and

finished products shall be clean, well-organized and suitable for its purpose.

3.7.2 Receiving documents, product identification, and facility design shall facilitate correct stock rotation of raw materials, work-in-process products, and finished products in storage. Materials shall be depleted in the correct order relative to their manufacturing date.

3.7.3 Non-conforming or rejected product shall be clearly labeled and segregated from other product immediately at the time of identification.

3.7.4 Temperature control of storage facilities shall be appropriate for maintaining product integrity.

3.8 Dispatch and Transport

3.8.1 While meeting all applicable regulatory requirements, documented procedures to maintain product safety and quality during loading and transportation shall be developed and implemented. These may include as appropriate:

- securing loads on pallets to prevent movement during transit.
- inspection of loads prior to dispatch

3.8.2 All vehicles used for the transport of raw materials and finished goods, shall be suitable, and in good repair. The supplier shall have safe-handling procedures for the transport of products.

Section 4: Supply Control

4.1 Supplier approval and performance monitoring

4.1.1 The supplier shall have a documented, risk-based supplier approval program and ongoing monitoring procedures to ensure that suppliers are manufacturing products using appropriate product safety controls, effectively manage risks to raw material quality and safety, and are operating effective traceability processes. The approval and monitoring procedure shall be based on a combination of the following, based on risk:

- Supplier audits
- Third party audits or certification (for example, ISO 9001 certified programs)
- Supplier questionnaires

4.1.2 The procedures shall define how exceptions are handled, e.g., where raw material suppliers are prescribed by a customer or where products are purchased from agents and a direct audit or monitoring has not been undertaken or where production schedules necessitate a truncated approval process.

4.1.3 The supplier shall be able to demonstrate that materials are only purchased from approved sources.

4.1.4 Contracts or formal agreements shall exist with all service providers, e.g., pest control, outside laboratories, waste management providers, contractors, which clearly define service expectations and ensure potential product safety risks associated with the service have been addressed. Service providers shall conform to the Personnel section of this Standard, where applicable.

4.1.5 New suppliers and service providers must undergo an initial assessment and periodic reassessments, the frequency of which will be determined by a risk assessment. This evaluation may consider material risk, business risk, previous assessments, or other pertinent supplier issues or conditions.

4.1.6 Where approval is based on questionnaires, these shall be reissued at a minimum frequency of every three years and suppliers will be required to notify the site of any significant changes in the interim.

4.1.7 Consideration shall also be given to the significance of a raw material on the product safety and quality of the final product. The risk assessment shall form the basis for the raw material acceptance and testing procedure, and for the processes adopted for supplier approval and performance monitoring.

4.1.8 If supplier monitoring activities identify opportunities for improvements, relevant actions shall be defined, implemented, verified for their effectiveness, and documented.

4.2 Raw material specifications

4.2.1 Specifications for all raw materials shall be available, adequate, accurate and ensure compliance with relevant safety and regulatory requirements.

4.2.2 Raw material specifications and procedures shall, at a minimum, include:

- Conformance to food contact regulatory and safety standards for all food contact specifications
- Compliance with relevant product safety requirement, e.g., relevant federal, state, local and provincial regulatory requirements, as well as all components of this document for all raw material specifications
- Approval of all changes to packaging or raw materials used for Starbucks' product by a Starbucks' assigned authority.

4.3 Outsourcing and use of co-manufacturers

4.3.1 The supplier shall ensure that approval and monitoring of subcontractors conforms to the Supplier approval and performance monitoring section of this Standard.

4.3.2 Supplier shall notify Starbucks in writing, and obtain documented approval from Starbucks, prior to any initiation of any subcontracted manufacturing of product for Starbucks. Documented approval by Starbucks SQ&PS representative(s) shall be maintained by supplier.

4.3.3 The supplier shall establish inspection and test procedures for outsourced product upon return, including visual, chemical and/or microbiological testing, dependent on risk assessment.

4.3.4 Any outsourced processing operations shall:

- Be undertaken in accordance with established contracts which clearly define any processing requirements and product specifications.
- Undergo annual audits by the supplier and/or maintain an ISO 9001 certification for that facility.
- Maintain product traceability.

Section 5: Product Control

5.1 Product Design/Development

5.1.1 The supplier shall have a written product development procedure that provides clear guidelines on any restrictions to the scope of new product developments to control the introduction of hazards, which would be unacceptable to the supplier or customers (including but not limited to choking and swallowing of small parts, strangulation, sharp edges and points, flammability, harmful chemicals or substances, electrical shocks or fires, tip-over, collapse or structural failure, entrapment, mechanical, radiation, and heat-related hazards).

5.1.2 All new products and changes to product design shall be reviewed and approved prior to release. This involves formal written approval by either the product safety and quality team, the design engineering team leader, or an authorized committee member, for new products, raw materials, alterations to product specifications, or changes in manufacturing methods prior to use within the facility.

5.1.3 Trials and pre-production runs using production equipment shall be carried out where it is necessary to validate that product design and manufacturing processes are capable to produce a safe product of the required quality.

5.1.4 All products shall be labeled to meet legal requirements for the designated country of use and shall include information to allow the safe handling, display, storage, and use of the product within the supply chain or by the customer. There shall be a process to verify that material composition and product labeling is correct for each design produced based on the product specifications.

5.1.5 Packaging and labeling review for compliance shall be documented, signed, and dated by the responsible individual. Documentation of review may be electronic or physical. All Products shall be designed/developed in accordance with product requirements provided by Starbucks.

5.1.6 In instances where a product is designed to substantiate a consumer-oriented claim (e.g., green, ethical, and/or performance-related), the supplier is obligated to comprehensively validate the product, encompassing material composition, production processes, and other pertinent variables. This validation must confirm adherence to the stated claim and compliance with all relevant regulatory prerequisites.

5.1.7 Starbucks QA requires TOP (top of production) samples from the supplier for all products that will be available for purchase in Starbucks stores. These samples should be distinct from those provided to the Starbucks Category and Sourcing teams. Starbucks QA will conduct tests based on relevant toolkit(s) and perform a Product Safety Review (PSR). During this phase, Starbucks' QA team will communicate any identified safety or quality concerns to the supplier.

- The supplier shall send 2 samples of every SKU being produced on behalf of Starbucks to the following address:

Starbucks Consumer Products Quality Assurance Team
Mail Stop-GQA 2SW
2401 Utah Ave. S
Seattle, WA 98134

5.2 Finished product specifications

5.2.1 To ensure Starbucks provides products of utmost quality to its customers, they require certain documentation to be provided and adhered to. Below you will see several types of documents that are pertinent to establishing and maintaining a successful partnership with Starbucks Coffee Company.

- **Specification Sheets:** Specifications shall be available for all finished products. These shall either be in the agreed format of the customer or, in the case of branded products, include key data to meet legal requirements and assist the consumer in the safe usage of the product. A specification sheet must be filled out in its entirety and accurately reflect the product(s) that will enter the stream of commerce. Starbucks QA expects to receive the specification sheet with or before they evaluate the approved sample. For a copy of the Starbucks Product Specification Sheet, please reach out to MerchQA@Starbucks.com.

1. Starbucks product specifications shall include (but are not

limited to): a description of the product; intended use; proprietary rights; branding guidelines; and requirements for: regulatory, labeling, analytical, physical, construction and workmanship, packaging and shipping, performance, maintenance, cleaning, certification and documentation, and quality assurance (within specified Acceptable Quality Levels).

2. Changes to Starbucks finished products specifications, associated processes, or raw materials shall not be made without the approval of Starbucks assigned authority.

- **Children's Product Certificate:** (CPC) this is a document through which the manufacturer or importer certifies that the products designed for children meet all relevant safety regulations. This certification is reliant on successful testing conducted by an accredited third-party laboratory and must be included in the shipping documentation.
- **2D Renderings**: Suppliers are required to submit 2D renderings of every ceramic and glass item with the item test reports and specification sheets. If there is a material change, a new 2D rendering must be submitted.

5.2.2 Suppliers shall have a documented claim verification program in place that is managed by qualified individuals to ensure the accuracy of all product claims, including those regarding country of origin, product performance, environmental impact, sustainability, and ethical standards, are factually accurate and compliant to regulatory standards. This requirement includes maintaining documentation that validates and supports all product claims, ensuring adherence to regulatory standards and industry norms.

5.3 Chemical and physical product contamination control

5.3.1 Appropriate facilities and procedures shall be in place to control the risk of chemical or physical contamination of product.

5.3.2 There shall be written procedures to control the risk of chemical or physical contamination in finished products. Chemical or physical contamination findings shall be trended and reviewed during meetings specified in the Management Review section of this Standard to identify additional opportunities for their prevention and elimination.

5.3.3 There shall be an approved list of chemicals for purchase.

5.3.4 Chemical specifications and material safety data sheets (SDS) shall be available for all chemicals on the supplier's property.

5.3.5 When appropriate, there must be adequate systems in place for the

removal of physical product risks (e.g., X-ray or metal-detection equipment, foreign object detection). Each system shall have documented validation and verification that proves its effectiveness.

5.3.6 A knife, sewing needle, and sharp metals/objects control policy, for facilities that require them in production or handling areas, shall be in place to ensure that all broken sharp objects are immediately identified, and the necessary actions are taken to prevent contamination of the products.

5.4 Product Inspection and Laboratory Testing

5.4.1 Safety and quality testing shall be conducted for all consumer products and retail packaging that Starbucks sells. The supplier is accountable for knowing which regulations apply to the goods that are being manufactured and that they are tested accordingly.

- Multiple regulations often apply to any given product. To attain compliance with all local, state, federal, and provincial regulations, Starbucks requires suppliers to test to the most stringent standard or law. Starbucks has retail locations globally which means suppliers must take the intended market(s) into consideration when manufacturing and testing their products.

5.4.2 There shall be a defined program of product inspection and testing as appropriate to control risks:

- This may include microbiological, chemical, physical and organoleptic testing according to risk.
- The methods, frequency and specified limits shall be documented. Where applicable, product safety testing shall conform to requirements outlined by Starbucks.
- Suppliers are required to submit evidence of critical control point inspections for each ceramic and glass SKU along with toolkit test reports to MerchQA@Starbucks.com or Starbucks QA contact. Established critical control points for each substrate are listed in the respective substrate Toolkits.

5.4.3 Test and inspection results shall be recorded and reviewed regularly to identify trends. Appropriate actions shall be implemented promptly to address any unsatisfactory results or trends.

5.4.4 All products must be tested by an accredited third-party laboratory. Third-party testing is required on a production sample, ensuring its accuracy as a true representation of the product in the stream of commerce, distinct from a 'golden sample'.

- Performance testing may be completed in-house if the in-house laboratory is approved and certified by Starbucks QA. Otherwise, all

performance and chemical testing must take place at an accredited third-party laboratory.

- Products that are part of the core assortment (carried over across multiple promotions) must undergo 3 different types of testing:
    1. **Initial Product Certification** – Every product must undergo chemical and performance testing from an accredited 3rd party laboratory before it first enters the stream of commerce.
    2. **Periodic Testing Plan** – Chemical and performance testing must be completed at regular intervals to ensure products continue to meet applicable standards. This must occur annually, or as material changes occur.
    3. **Material or Shape Change Testing** – An item must be tested/retested in the event of a material change to the product. This may include a change in materials, design, production method, production equipment, manufacturing process, or any deviation from the circumstances under which the product underwent Certification or Periodic Testing.
- Products that are part of a promotion or limited time offering must undergo initial product certification testing only.

5.4.5 Procedures shall be in place to ensure reliability of laboratory results and conformance to Good Laboratory Practices. These shall include:

- Use of recognized and validated test methods (e.g., ISO or ASTM approved)
- Documented testing procedures
- Ensuring staff are suitably qualified, trained, and competent to carry out the analysis required.
- Use of a system to verify the accuracy of test results (for example, proficiency testing)
- Use of appropriately calibrated and maintained equipment.
- Appropriate disposition of products entering the lab to prevent reintroduction to the production environment and storage facilities.

5.4.6 On site labs should be under a check-sample program at least once per year.

5.4.7 Where testing laboratories are present on the manufacturing site, they shall be located, designed, and operated to eliminate potential risks to product safety. Documented controls shall include:

- Design and operations of drainage and ventilation system

- Access and security of the testing facility
- Movement of laboratory personnel
- Protective clothing arrangements
- Disposal of laboratory waste

5.4.8 All final product testing must be conducted by an ISO 17025 accredited, or equivalent, third-party laboratory. The scope of the accreditation shall cover the applicable testing for the product. All items that require testing must be tested at a Consumer Product Safety Commission (CPSC) accredited lab. A list of accredited testing laboratories can be found at the following location. https://www.cpsc.gov/cgi-bin/labsearch/

5.4.9 Products must be tested per the Starbucks Global Toolkit requirements. The onus is on the supplier to ascertain which markets the products will be sold in and to ensure they comply with all applicable local, state, federal, and provincial regulations. Should an item not meet these requirements and a fine, penalty, or recall occurs, the supplier is responsible for covering all fees associated with the noncompliance and indemnifying Starbucks.

5.4.10 The supplier shall be able to substantiate all product claims through testing and/or other documentation. Should an item not meet the claims and a fine, penalty, or recall occurs, the supplier is responsible for covering all fees associated and indemnifying Starbucks.

5.4.11 Test records shall conform to the applicable document control and record retention requirements of this Standard.

5.4.12 Samples of SKU shall be retained at the production premises or parent supplier office for a minimum of 3 years.

5.4.13 The supplier shall ensure that finished product is not released unless all agreed procedures have been followed.

5.4.14 Upon completion of testing, all 3rd party test reports must be sent to the Starbucks Consumer Products Quality Assurance Team at the following e-mail: MerchQA@Starbucks.com.

5.4.15 All 3rd party test reports must be received by Starbucks before the goods have been shipped. If test reports have not been received beforehand it will be reflected in the supplier's Key Business Review (KBR). Also, if Starbucks does not receive the supplier's test results before shipment and their product receives a failing report, the supplier is liable for all fees associated with removing the affected units from Starbucks' Supply Chain and the replacement with an acceptable and compliant product.

5.5 Shipping and receiving

5.5.1 Raw Material and Packaging Receiving and Inspection:

- The supplier shall have a documented procedure for the receipt of all incoming goods upon receipt to ensure compliance with specifications. Specifications and the requirements to be met for acceptance shall be available. Checks shall be executed by qualified individuals and shall at least include:
    - Visual, physical, or chemical inspection with clearly defined accept or reject criteria.

  Checks may also include:
    - A documented procedure for any variances to acceptance criteria, including exceptions (i.e., Product Exception Notice)
    - Certificates of conformance – specific to each lot
    - Certificates of analysis – specific to each lot
    - Purchase from an approved supplier
    - Product date and/or expiration checks
    - Integrity checks on the packaging of all incoming materials
    - Product sampling and testing to verify compliance to specification.
    - Certificates of Analysis for products shall be held on file.
- A procedure shall be in place to ensure that all out of specification incoming goods are quarantined and clearly labeled to prevent these products from being used.

5.5.2 Shipping and Transportation:

- Documented procedures to maintain product safety and quality during loading and transportation shall be developed and implemented. These may include, as appropriate:
    - Securing loads on pallets and using other measures such as shrink wrap, load-locks, and straps to prevent movement during transit.
    - Inspection of loads prior to shipping
    - Any restrictions on the use of mixed loads
    - Requirements for the security of products during transit, particularly when vehicles are parked and unattended.
    - Clear instructions in the case of vehicle breakdown which ensure the safety of the products is assessed and records maintained.
    - Integrity of the transport vehicle
    - Documented cleaning from prior loads

- Where cross-docking occurs, measures must be taken to ensure that cross-docked products do not pose a contamination risk to products being shipped from the facility.

5.5.3 Traceability shall be ensured during transportation. There shall be a clear record of shipping and receipt of goods and materials demonstrating that sufficient checks have been completed during the transfer of goods.

- All vehicles used for the transport of raw materials, including packaging, and finished goods, shall be suitable, hygienic, in good repair, and free of visible damage or infestation. Inspections shall be complete, and records shall be available to demonstrate on-going compliance.

5.5.4 Where the supplier employs third-party contractors, all the requirements specified in this section shall be clearly defined in the contract and verified or the contracted company shall be certified to an equivalent recognized standard.

5.6 Control of Nonconforming Product

5.6.1 Suppliers shall ensure that any out-of-specification product is effectively identified and quarantined to prevent accidental release. A method for reconciliation of quantities quarantined shall be in place and procedures should exist to control the disposition of quarantined product.

5.6.2 Suppliers shall ensure that responsibilities are clearly defined for decision making on the use or disposal of products appropriate to the issue (e.g., destruction or reworking).

5.6.3 Decisions and actions associated with nonconforming products shall be recorded in a manner that allows for review and trending.

Section 6: Process control

6.1 Control of Operations

6.1.1 Documented process specifications and/or work instructions shall be available for the key processes in the production of products to ensure product safety, legality, and quality.

6.1.2 In circumstances where process parameters are controlled by in-line monitoring devices, these shall be linked to a suitable failure alert system that is routinely tested.

6.1.3 Process monitoring devices shall be adequately controlled and recorded to ensure that product is produced within the required process specification.

6.1.4 Where variation in processing conditions may occur within equipment critical to the safety or quality of products, the processing characteristics shall be validated at a frequency based on risk and performance of equipment.

6.1.5 In the case of equipment failure or deviation of the process from specification, procedures shall be in place to establish the safety status and quality of the product to determine the action to be taken, undertake a root cause analysis and correct the problem with full documentation.

6.1.6 Documented checks of the production line shall be carried out before commencing production and following changes of product. These shall ensure that lines have been suitably cleaned, are in good operating condition, and are ready for production.

- Documented checks shall be carried out at product changes to ensure all products and printed packaging from the previous production lot have been removed from the line before changing to the next production lot.

6.1.7 Documented procedures shall be in place to ensure that products are packed into the correct packaging and correctly labeled for each production run. These shall include:

- Label and packaging verifications at the START of packing (first label applied),
- Label and packaging checks during the packaging run, using a documented, risk-based frequency.
- Verifications following packaging changes and when changing batches/rolls of packaging materials.
- Label and packaging verifications at the end of packing (last label applied),
- The procedures shall also include verification of any code information or other printing carried out offline (e.g., in print/label rooms).

6.2 Calibration and Control of Measuring and Monitoring Devices

6.2.1 Equipment shall be readable and be of a suitable accuracy for the measurements it is required to perform. All identified measuring devices, including new equipment, shall be calibrated at a predetermined frequency based on risk assessment and to a defined method traceable to a recognized national or international standard, where possible. Where a traceable calibration is not possible, the supplier shall demonstrate the method and rationale of the standardization carried out.

- Results shall be documented and if calibration is outsourced, calibration certificates must be available.

6.2.2 Equipment shall be labeled with identification codes and calibration due dates. Suppliers shall have documented procedures that include:

- A documented list of equipment and its location
- Identification of equipment used.

- Methods for prevention from adjustment by unauthorized staff
- Methods for protection from damage, deterioration, or misuse

6.2.3 Verification procedures shall be in place to ensure equipment is of a suitable accuracy for the measurements it is required to perform. Frequency of verification checks shall be based on risk assessment.

6.2.4 Procedures shall be in place to record actions to be taken when the prescribed measuring and monitoring devices are found not to be operating within specified limits.

- Where the safety or legality of products is based on equipment found to be inaccurate, action shall be taken to ensure at-risk product is not offered for sale. Non-compliant equipment must comply with maintenance requirement of this Standard to prevent accidental use.