# Introduction

With the intention to continuously improve our services, we have implemented some changes with regards to our strategy for answering customer questionnaires.

We consider answering your questionnaires an important part of our mutual communication and sharing of relevant information to build and strengthen our shared supply chain. However, as you might be able to imagine, we are facing a multitude of differently drawn up questionnaires and on-line systems that are not mutually interchangeable, which lays a heavy claim on the time our QA department has available.

For this reason, we have seen it as our responsibility to rationalize these requests while continuing to assure that you receive the information you need.

The present document, together with our product specifications that are available 24/7 via <http://organic.nl/producten.php?type=ingr>) will answer all your general questions about our code of conduct, quality policy, quality system, certifications and products.

# Part one: General information

## Contact Details

|  |  |
| --- | --- |
| Supplier  | DO-IT B.V./DO-IT Consumer Products and DO-IT Food Ingredients, further mentioned as DO-IT B.V. |
| Street + number  | Hermesweg 7 |
| Zip code  | 3771 ND |
| City  | Barneveld |
| Country  | The Netherlands |
| Phone number  | +31 85 487 0487 |
| Website  | www.organic.nl  |
| Quality Assurance contact person | QA Department |
| Phone number  | +31 85 487 0487 |
| E-mail address  | quality@organic.nl  |
| In house emergency responseCrisis teamPrevention OfficerEmergency contact person in case of emergency / recall and telephone number.  | Vincent Evers, mobile number 0031(0)655753780In case Vincent can’t be reached please call:Bert Mulder, mobile number 0031(0)612082715Vincent Evers, mobile number 0031(0)655753780Vincent Evers, mobile number 0031(0)655753780During office hours please contact your regular contact person within DO-IT. Out of office hours emergency contact: Logistics: Vincent Evers, mobile number 0031(0)655753780Purchase: Hans van Essen, mobile number 0031(0)629259285Sales: Jurgen Meijer, mobile number 0031(0)654943061QESH: Maarten Molenaar, mobile number 0031(0)682456305 |
|  |  |

## Financial details

|  |  |
| --- | --- |
| Bank | Rabobank |
| Account number | 1369.18.344 |
| IBAN | NL66RABO0136918344 |
| Swift-BIC | RABONL2U |
| Chamber of Commerce registration | CoC Oost-Nederland, 09071238 |
| VAT number | NL 003562268B01 |
| Terms of delivery and settlement | www.organic.nl |

Part two: business conduct

Our priority is to be a successful business organization, which means for us to invest in growth and balancing both short- and long-term interests. It also means caring about our principles, customers, employees, our business partners and our environment. To succeed we need to reach the highest standards of behavior from all of us. The general principles contained in this Code set out those standards.

DO-IT b.v. and supplier partners conduct their business in accordance with the spirit, as well as the letter, of the law. We believe in and adhere to standards of ethical conduct in all business operations, even beyond the strict requirements of the law, applicable to (all DO-IT b.v. Group companies and to) all supplier partners in respecting and upholding our philosophy.

DO-IT b.v. selects its agents and suppliers based on their abilities to perform the required work competently and comply with our code of conduct. Supplier partners must be prepared to provide DO-IT b.v. with information about subjects mentioned in this guideline. In accordance with our code of conduct, supplier partners must be prepared to be audited by DO-IT b.v.

Our code of conduct encompasses our philosophy, guidelines and policies as they relate to:

* Child Labor
* Forced labor
* Disciplinary Practices
* Legal Requirements
* Industry Standards
* Ethical Standards
* Traceability
* Working Hours
* Wages and Benefits
* General Labor Practices & Freedom of Association
* Discrimination
* Health & Safety
* Environment
* EcoSocial
* Privacy and Confidentiality
* Product Safety

## 1) Child labor

All supplier partners (excluding farmers and growers):

* Workers can be no less than 15 years of age and not younger than the compulsory age to be in school. We will not utilize partners who use child labor in any of their facilities.
* Farmers/Growers Sector;
* Applicable local laws must be followed;
* Youths ages 16 and above may work in any farm job at any time;
* Youths aged 14 and 15 may work outside school hours in jobs not declared hazardous as defined by local law;
* Youths 12 and 13 years of age may work outside of school hours in non-hazardous jobs in farms that also employ their parent(s) or with written parental consent;
* Youths under 12 years of age may work outside of school hours in non-hazardous jobs with parental consent;
* Local youths 10 and 11 may hand harvest short-season crops outside school hours if their employers have obtained special waivers from the appropriate labor department;
* Youths of any age may work at any time in any job on a farm owned or operated by their parents;
* We support the development of legitimate workplace apprenticeship programs for the educational benefit of younger people.

## 2) Forced labor

We will not utilize or purchase materials from supplier partners that use forced labor. The supplier partner must not use involuntary labor of any kind or forced labor by governments. If the supplier partner recruits foreign contract workers, the supplier partner must pay agency recruitment commissions and does not require any worker to remain in employment for any period of time against his or her will.

## 3) Disciplinary Practices

We will not utilize supplier partners who use corporal punishment or other forms of physical or psychological coercion. Supplier partners must treat all workers with respect and dignity and provide them with a safe and healthy work environment. All supplier partners will be required to have approved written guidelines relating to employee working treatment and conditions.

## 4) Legal Requirements

All supplier partners should be in good standings with all local and national applicable government laws and regulations. We expect our supplier partners to be law abiding as individuals and to comply with legal requirements relevant to the conduct of all their businesses. Supplier partners must observe and follow the rules of local laws and regulations.

## 5) Industry Standards

Supplier partners must be in compliance with applicable industry recognized certification standards such as HACCP, IFS, BRC or other. They must also be in compliance with organic certification. If required, certifications like fair trade, and kosher etc.

Commit to the development and use of the highest standards and practices for organic production, processing and handling. Observe all local, federal and international regulations pertaining to production, processing and handling.

Commit to the development and use of the highest standards and practices for production, processing and handling. Observe all local, federal and international regulations pertaining to production, processing, and handling.

Comply with HACCP regulations for production, processing and handling.

If required:

Commit to the development and use of the highest fair-trade standards and practices. Observe all of code of ethics pertaining to fair trade regulations

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Commit to the development and use of the highest standards and practices for kosher production, processing and handling. Observe all rabbinical regulations pertaining to kosher production, processing and handling.

## 6) Ethical Standards

We wish to be recognized as a company of high ethical standing. We will seek to identify and utilize supplier partners who aspire as individuals and in the conduct of all their business practices to a set of ethical standards not incompatible with our own.

The code of conduct guidelines establishes expectation of DO-IT b.v. for conducting business in a manner that is consistent with our value statement and in compliance with laws and government regulations.

Supplier partners must not engage in corrupt or unethical practices, such as paying bribes in exchange for jobs, preferential treatment, etc. Unauthorized sub-contracting is prohibited. Supplier partners must only maintain one set of complete and accurate working-hour and payroll documents and records that represent true working conditions.

## 7) Traceability

To provide our customers with complete traceability, it is vital for us to have an open and transparent dialogue with our suppliers. We require that our suppliers have full traceability in their production of all materials originating from all sources.

Suppliers must be prepared to provide DO-IT b.v. with information about the presence of GMO’s in all products and raw materials.

## 8) Working Hours

While permitting flexibility in scheduling, we will identify local legal limits on work hours and seek supplier partners who do not exceed them except for appropriately compensated overtime.

While it is understood that overtime is often required, supplier partners shall carry out operations in ways that limit overtime to a level that ensures humane and productive working conditions. Employees should be allowed at least one day off in seven.

## 9) Wages and Benefits

We will only do business with supplier partners who provide wages and benefits that comply with any applicable laws and match the prevailing local industry practices.

Wages are essential for meeting the basic needs of employees and reasonable savings and discretionary expenditure. Legally mandated benefits must be provided. Payment of wages should be in a timely manner and at a minimum monthly.

Workers shall be paid at least the local minimum wage or a wage that meets local industry standards, or whichever is greater. Hourly rates for overtime must be higher than the regular work shift. The supplier partner provides paid annual leave and holiday as required by law or which meet the local industry standard, whichever is greater.

Supplier partners must record all employee working hours and deductions completely and accurately. Supplier partners must not engage in practices designed to circumvent national or local wage, benefit or labor laws, such as annually firing and rehiring workers, designating workers as probationary, etc.

## 10) General labor Practices & Freedom of Association

We respect workers’ rights to form and join organizations of their choice and to bargain collectively. We expect our suppliers to respect the right to free association and the right to organize and bargain collectively without unlawful interference. Supplier partners must respect employee rights to freedom of association; they must not impose any punitive actions against workers in supporting union such as threatening, fining, suspending or firing workers exercising those rights. They should ensure that workers who make such decisions or participate in such organizations are not the object of discrimination or punitive disciplinary actions and that the representatives of such organizations have access to their members under conditions established either by local laws or agreement between the employer and the worker organizations.

Any action that suppresses freedom of association is prohibited and may be an act deemed illegal in some countries. Laws in different countries vary substantially regarding freedom of association. Most countries maintain procedural regulations on the actions of workers and employers. Some countries place substantial restrictions on workers’ rights of association. The DO-IT b.v. code of conduct provision on free association neither permits, nor requires DO-IT b.v. or its supplier partners to engage in unlawful activities to protect the rights of association. Nevertheless, where the right to freedom of association and collective bargaining is restricted under law, the supplier should not hinder the development of lawful parallel means for independent free association and bargaining.

## 11) Discrimination

We believe the dignity, individuality and privacy of all people must be respected.

While we recognize and respect cultural differences, we believe that workers should be employed on the basis of their ability to do the job, rather than on the basis of personal characteristics or beliefs. We will favor supplier partners who share this value.

We aim to employ people who reflect the diverse nature of society and we value people and their contribution irrespective of age, sex, disability, sexual orientation, race, color, religion, marital status, or ethic origin. Discrimination against anyone for their membership or affiliation to any trade union or political party is prohibited. There is zero tolerance of any sexual, physical, or mental harassment.

## 12) Health & Safety

We will only utilize supplier partners who provide workers with a safe and healthy work environment. Appropriate training shall be undertaken to ensure that employees understand the organization’s health and safety policy.

When a supplier partner has residential facilities for their employees, the housing must constitute a safe and healthy environment. All applicable laws and regulations should be followed that relate to health and safety, including: fire safety, sanitation and risk protection, electrical, mechanical and structural safety.

## 13) Environment

Our goal is to do business with supplier partners who share our commitment to the environment. We encourage continuous improvement, responsible use of raw materials and natural resources, and operations designed to reduce activities that have a harmful impact on the environment. We would like to inspire our supplier partners in working for continuous improvement within this area and pollution prevention as well.

## 14) Fair Trade IBD

IBD has developed a certification system that seals economical, ecological and social criteria for all links in the chain. The Fair Trade IBD certification contributes in the most visible and most direct manner to a better distribution of the added value that is realized in the whole chain from farmers to consumer. Participating organizations formulate annually at least two social and two ecological goals, based on progress criteria. The goals are chosen by the producer and his employees or by a farmer association. The costs that are needed to realize these goals are converted to a small price premium per product. Every organization is annually inspected by IBD or by an another independent certification body that executes the Fair Trade IBD program for IBD.

DO-IT selected Fair Trade IBD because this is a seal that:

* Encloses different cultural realities, contributing for valorization of minor ethnic groups;
* Enables operators to work within the concept of continuous improvement, respecting specific social and environmental characteristics;
* United aspects of product quality, socio-economic and environmental conditions and Fair Trade in a single Certification System

## 15) Privacy and Confidentiality

Supplier partners must exercise care not to disclose non-public information regarding DO-IT b.v. or its operations.

You must be sensitive to the kinds of information that constitutes DO-IT’s confidential and proprietary information, sometimes referred to as trade secrets. Confidential and proprietary information is that which is not known or available to the public and which might adversely affect DO-IT’s interests if it were disclosed.

This information may include, but is not limited to, product and business plans, personnel data, advertising or promotional programs, contractual terms and relationships, budgets, customer lists and sales forecasts. In addition to protecting our own trade secrets and other confidential and proprietary information, it is our policy and practice to respect the trade secrets of others.

## 16) Product Safety

We require that our supplier partners have documented product safety procedures in place and are in compliance with Food safety regulations like HACCP, IFS, BRC or other.

# Part three: Quality Policy

The Quality Policy of DO-IT is based on a long-term experience in dealing with raw materials. In the more than 20 years of our existence DO-IT has developed a very successful philosophy on how to bring the customers’ needs and principal needs together to a long-lasting partnership.

At DO-IT we look for a continual improvement process whereby everyone strives to be the best, taking pride in their work, learning from mistakes and realizing that each member of the DO-IT team can add value to the organization as a whole and the external partners we serve. This means that we have to meet our customers’ requirements, where we pay special attention to the specific safety requirements from each customer/market segment. Furthermore, we strive to exceed their expectations by understanding the customer's process and anticipate their needs by creating innovative solutions and services. Fundamentally we are looking for long term relationships with all our Customers – our employees, our external Customers and our suppliers. With such long-term relationships come trust and understanding and, we hope, many more years of profitable business.

Furthermore we declare:

* a satisfactory quality policy is essential in offering (continuing) guarantees with respect to product safety for man, animals and the environment that we will do all that is necessary to ensure that the products of the businesses we direct will comply at all times with the legislative requirements as there is the General Food Law and Food Hygiene Regulations;
* we accept that careful quality assurance is crucial in preventing disasters and their negative consequences for customers and others in the supply chain;
* we accept our responsibility for the optimal structuring and implementation of our quality policy, through the creation of requirements within the business which will allow the optimal implementation of the necessary activities and give a high priority to quality awareness in thought and action among all staff involved;
* we have appointed a quality officer charged with ensuring proper implementation of the quality policy devised in accordance with the BRC requirements for the Food Sector. In consultation with management if required, this quality officer will be authorized to take measures with which other staff must comply to ensure that the necessary steps are taken in the field of quality, and that any shortcomings are rectified or prevented;
* we will ensure that all staff involved are familiar with the objectives of the quality policy and the practical measures required for quality assurance, and that they behave in a quality-conscious way.

## The DO-IT Quality Management System

DO-IT has established a quality management system to measure its progress in continuous quality improvement. Some of the tools used to monitor progress include external and internal customer surveys, auditing or organizational self-assessments, and customer complaint systems. The quality management system is based on customer focus, leadership, involvement of people, process approach, system approach to management, continual improvement, and factual approach to decision-making and mutually beneficial supplier relationships. The application of the quality system is not only aimed to provide direct benefits but also make an important contribution to managing costs and risks.

Like any other system, it either improves or becomes less effective. DO-IT is committed not only in the implementation of the quality management system but also in its continual improvement. Continual improvement increases the effectiveness and efficiency of the organization to fulfil its quality policy and quality objectives that would enhance customer and stakeholders' satisfaction.

DO-IT Quality Management System is not a stand-alone system, but is integrated within DO-IT’s Operating Management System, which encompasses policies, requirements and work processes. This approach to an integrated system ensures implementation of a management system that promotes business excellence through leveraging of best practices.

A regular management review of the quality management system (Management Quality Meeting) is to be done to ensure continuing suitability, adequacy and effectiveness including planning and review of changes to the system.

## Quality Assurance and Quality Control

A Quality Assurance and Quality Control Program operates throughout the whole organization. These programs assure a reliable supply of high-quality products which are fully suitable and safe for the end use intended by our customers and which meet all legal requirements.

The following elements are essential components of these programs:

* Quality Systems and Standards
* Quality Audits
* HACCP (Hazard Analysis and Critical Control Points)
* Raw Materials and Ingredients Control Program
* Product and Customer Specifications
* Product Recall Procedure
* Quality Complaints Follow-up
* Training
* Approval & Evaluation of suppliers

### Quality Systems and Standards

Quality Certificates DO-IT\*:

* BRC Global Standard for Food Safety (issue 8) – certified by TÜV NORD INTEGRA
* RiskPlaza Audit+ – certified by Lloyds Register\*\*
* EU organic – certified by SKAL (NL-BIO-01)
* NOP organic – certified by Control Union
* Fair Trade IBD – certified by IBD
* Fair Trade – certified by FLO
* RSPO distributor license
* Kosher certification, Pareve non-Passover – COURT Of THE CHIEF RABBI BETH DIN, LONDON

\* All certificates can be found at our website: <https://www.organic.nl/organic-interest/certificates.html>

\*\* In the covenant between RiskPlaza and the NVWA (Dutch Food Safety Authority) it was agreed that customers of RiskPlaza Audit+ certified companies do not have to carry out independent quality verification. This has also been accepted by multiple parties in the UK, France, Belgium and Germany, including BRC certified retail suppliers.

### Quality Audits

DO-IT Quality Management System is reviewed twice a year by Lloyds Register. Part of DO-IT Quality Management System includes annual internal audits, carried out by trained independent auditors. These audits ensure adherence to procedures and also highlight areas for improvement. The internal audits are done according to the Internal Audit Procedure. An internal audit report is written based on the findings of the audits, including improvement suggestions. This internal audit report is input for the regular management review.

### HACCP (Hazard Analysis and Critical Control Points)

Based on the HACCP concept, we have defined control points at all levels of the process as necessary to assure specified product quality and safety.

Content HACCP system within DO-IT:

1. Product Safety Team
2. Product Safety Manual
3. Food Safety yearly targets
4. Internal audit planning
5. Recall plan & Traceability test
6. Verification of Food Safety in:
	1. Management Quality Meeting (monthly and verification meeting 1 x per 6 months)
	2. HACCP team Meeting (minimum 4 x per year, when needed)

### Raw Materials and Ingredients Control Program

Suppliers and logistics companies are methodically audited. Quality Control Procedures of the incoming raw materials could include testing of Pre-shipment samples. Furthermore, we control our suppliers by random checks frequently comparing the certificate of analysis to our most recent specification, EU legislation and methods of analysis to ensure the information is relevant and trustworthy. These tests are done to ensure that the identity and quality is as ordered. The analytical data are used to monitor the performance of suppliers.

The ingredients are bought from approved suppliers, who are preferably GFSI certified, though not always possible. For each product/supplier a Risk Analysis is performed. According to the outcome, the Quality Assurance Program for this supplier is defined. Quality paragraphs are included in the Supplier Contract.

### Product Specifications

Product specifications contain the chemical and physical characteristics. The results of the analyses

performed by the producer are reported in a Certificate of Analysis which is sent on request to the

customer (quality@organic.nl). Parameters and frequencies vary per product/supplier. Specifications can also be found on our website: [www.organic.nl/ingredients/](https://www.organic.nl/ingredients/) and [www.organic.nl/products/consumer-products](http://www.organic.nl/products/consumer-products).

Any major change in specification which will have important consequences on your ingredient

declaration and or allergen information will be notified in advance. Specifications are always to be downloaded from www.organic.nl.

### Product Recall Procedure

It is the policy of DO-IT to deliver safe products which are fully suitable for the end use required by its

customers and which meet all legal requirements in the countries in which they are sold. The company operates a Quality Assurance Program throughout the system to ensure that the Company Quality Policy is upheld.

However, when circumstances arise in which products are delivered which do not meet the standards laid down in this policy, then those products may be recalled. If product recall is necessary, then the Product Recall Procedure will be followed. This procedure makes use of the traceability systems in place in the various departments. Once a year the Product Recall Procedure is reviewed and tested.

### Traceability

Our ERP system which is used by DO-IT for the processing of orders allows DO-IT to register all

relevant details with regards to every order. This includes batch information which can be used for quick traceability of the purchased and delivered material. We can trace on order number, invoice number or batch number.

### Non-Conformities (complaint handling)

A quality procedure is in operation to deal with any customer complaints and reactions. Complaints

about the quality of our products and/or services by external or internal clients are recorded in our ERP-system. This type of feedback is an important source of information in our attempts to continuously improve the quality of our products and services.

The Non-Conformity procedure describes how a non-conformity is initiated and handled. Each complaint is investigated by the relevant department and/or Third Party (i.e. Transport Company). For each complaint the cause is investigated. After that proposed actions/adjustments to working procedures are defined. Actions proposed can be immediate or may await discussion in the Quality Review Meeting.

Progress on actions is reviewed to ensure that actions are implemented and effective. Main trends,

achievements and statistics in relation to non-conformities are summarized in the Management Review Report.

### Training

The skills, expertise and experience of our employees are vital to the operation of the business, not only to ensure that the quality of products and services meets the requirements of the customer but also to ensure safe and efficient operations. DO-IT encourages self-development for all its employees and, where appropriate, will support employees' endeavors to advance their skills and knowledge. All employees are given a basic instruction when starting at DO-IT. Procedure changes or internal audit results can lead to a renewal of this instruction or additional training. On a regular basis product training and Food safety training is provided to all employees. Other training arrangements are made based on the yearly personal evaluation.

### Approval & Evaluation of suppliers

Based on the production location, product risk assessment and available quality systems the risk assessment is performed by DO-IT Quality department. Potential risks related to supplier and product are assessed and controlled by either the supplier or DO-IT. All suppliers are evaluated based on the performances, complaints, quality systems and other relevant information. Supplier audits are part of our Supplier approval and evaluation system.

# Part Four: logistics

The General Terms are:

* Deliveries are in compliance with the relevant EU Regulations;
* Storage facilities are approved by audits. Products are stored in cool and clean warehouses, free of insects and rodents, away from hazards, strong odors and direct light (UV, sunlight);
* Each packaging unit (drum, bag, cardboard box) is clearly identified with: supplier name, product name, batch number, production date / crop year, net content, and other information required by law;
* Bulk material is transported with certified forwarders and is only loaded when a cleaning certificate is available for the designated truck;
* Pallets, free from odors, are inspected before loading;
* We use FIFO when delivering from stock, as do most of our suppliers;
* If a delivery consists of more than 1 batch this is mentioned on the CMR.

## New logistic partner

Before starting with a logistic partner an evaluation is made based upon DO-IT quality standards,

information available regarding quality and an inspection. This evaluation will be the basis for the decision to do business with a logistic partner.

## Logistic partner inspection

The DO-IT responsible visits the local warehouses on a frequent base. During this visit the DO-IT standards and improvements are checked. Furthermore, packaging and traceability is checked at random, inbound records of visual inspection are checked, and all complaints and Critical Process

Indicators are discussed. A report is then written regarding this visit and improvements need to be made before next visits.

## Logistic partner evaluation

Forwarders and Warehouses are evaluated regularly basis. The outcome of this evaluation can be a basis for a visit and / or audit for both warehouse and forwarder partners.

# Part five: Supplier Self Audit Questionnaire Answer

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 1. | Quality Management  | yes | no | n/a |
| 1.1 | Do you have a Quality Policy, Manual and Procedures describing operations?  | x |  |  |
| 1.2 | Is the Quality Management responsibility and authority clearly defined?  | x |  |  |
| 1.3 | Is a procedure for internal audits and an audit plan available?  | x |  |  |
| 1.4 | Is the Quality Management System review held at least once a year?  | x |  |  |
|  |  |  |  |  |
| The DO-IT Quality Management System is reviewed by Lloyd's Register & TÜV. |
| Part of the Quality Management System includes annual internal audits carried out by trained, independent auditors. These audits ensure adherence to procedures and highlight areas for improvement. |
|  |  |  |  |  |
| 2. | Food Safety  | yes | no | n/a |
| 2.1 | Do you have a formal risk assessment and HACCP System in place? | x |  |  |
| 2.2 | Who carries out HACCP reviews and how often are they conducted? | Head of Quality and Compliance, 1/6 months |
| 2.3 | Do you have a trained HACCP team? | x |  |  |
| 2.4 | Do you audit your HACCP system? | x |  |  |
|  |  |  |  |  |
| DO-IT cooperates with producers having food safety systems in operation. Furthermore following European hygiene legislation Regulation 852/2004/EC, DO-IT has implemented HACCP studies which are conditioned by the scope of our activity. We have defined OPRPs at relevant levels of supply chain that are necessary to assure specified product quality and safety. HACCP studies are carried out to meet hygiene standards and customer demands |
|  |  |  |  |  |
| 3. | Personnel & Training | yes | no | n/a |
| 3.1 | Is personnel provided with written responsibilities? | x |  |  |
| 3.2 | Are employees trained on the SOPs required for their job? | x |  |  |
| 3.3 | Are employees trained for food safety requirements? | x |  |  |
| 3.4 | Are training records retained and available? | x |  |  |
|  |  |  |  |  |
| 4. | Suppliers & Raw Materials | yes | no | n/a |
| 4.1 | Are raw materials sourced from approved suppliers?  | x |  |  |
| 4.2 | What are the approval criteria? | Potential, quality |
| 4.3 | Do you operate routine supplier evaluation?  | x |  |  |
| 4.4 | Do you audit your suppliers? | x |  |  |
| 4.5 | If yes, on what frequency? | Based on risk |
|  |  |  |  |  |
| Our suppliers are preferably GFSI certified, though not always possible. Our risk assessment is based on production location, supplier documentation (including relevant accreditations) and the complaints related to food safety. An audit is performed for high risk suppliers. Potential risks related to supplier and product are assessed and controlled by either supplier or DO-IT.  |
| 4.6 | Do you inspect raw materials on receipt ?  | x |  |  |
|  |  |  |  |  |
| 5. | Activities at site | yes | no | n/a |
| 5.1 | Production  | x |  |  |
| 5.2 | Repackaging  | x |  |  |
| 5.3 | Sampling & Testing  | x |  |  |
| 5.4 | Storage and Transportation (can be on same site but transport is always outsourced)  | x |  |  |
|  |  |  |  |  |
| 6.  | Storage & Transport | yes | no | n/a |
| 6.1 | Do you have your own storage premises?  | x |  |  |
| 6.2 | Do you have your own means of transport or subcontracted ones? | Subcontracted |
| 6.3 | Do you approve subcontractors for storage and transport?  | x |  |  |
| 6.4 | Are there storage areas designed and operated in a way to ensure cleanliness, appropriate hygiene and a minimization of cross-contamination risks?  | x |  |  |
| 6.5 | Do you segregate raw materials and finished products?  | x |  |  |
| 6.6 | Is the access to the product storage area restricted to authorized personnel only? | x |  |  |
| 6.7 | Are there procedures for cleaning and personal hygiene present on site?  | x |  |  |
| 6.8 | Is there a written cleaning program available?  | x |  |  |
| 6.9 | Is cleaning documented?  | x |  |  |
| 6.10  | Are products stored on the pallets and without contact to walls and ceiling? | x |  |  |
| 6.11 | Do you have pest control program in place?  | x |  |  |
| 6.12 | What pests are covered ?  | Rodents, creeping and flying insects |
| 6.13 | Which inventory management principle do you apply (FIFO, FEFO)? | FEFO |
| 6.14 | Are trucks inspected before loading for cleanliness?  | Yes, visually |
| 6.15 | Describe waste disposal: | Containers or designated place, segregated waste collected by external company |
| Products are stored in cool and dry warehouses, free of insects and rodents, away from hazards, strong odours and direct light (UV, sunlight). |
|  |  |  |  |  |
| 7. | Non-conforming product | yes | no | n/a |
| 7.1 | Is there the procedure in place to identify and control non-conforming product? | x |  |  |
| 7.2 | Are all non-conforming products identified and segregated | x |  |  |
| 7.3 | Please advise details: | Computerized system, physical segregation depends on the country  |
| A quality procedure is in operation to deal with customer complaints and remarks. Complaints about the quality of our products and/or services by external or internal clients are recorded in our CRM system. Each complaint is investigated by the relevant department and/or manufacturer, third party (i.e. forwarder). For each complaint the cause is investigated. After that proposed actions/adjustments to working procedures can be defined. Actions proposed can be immediate or may await discussion in the Quality Review Meetings. Progress on actions is reviewed to ensure that actions are implemented and effective. Main trends, achievements and statistics relating to non-conformities are summarized in the Management Review Report. |
|  |  |  |  |  |
| 8. | Traceability - Recalls | yes | no | n/a |
| 8.1 | Do you register and study complaints?  | x |  |  |
| 8.2 | Is there a recall procedure in place? | x |  |  |
| 8.3 | Do you test the recall procedure? | x |  |  |
| 8.4 | If yes, how often? | On yearly basis |
| 8.5 | Is it possible to trace the product from supplier to customer as per requirements of the 178/2002/EC Regulation?  | x |  |  |
| 8.6 | Is it possible to trace the product within max. 4 hours?  | x |  |  |
| ERP system allows DOIT to register all relevant details with regards to every order. This includes product article number and batch information which is unique and can be used for quick traceability of the purchased and delivered material.  |
|  |  |  |  |  |
| 9. | Quality documentation & Change Control | yes | no | n/a |
| 9.1 | Do you handle written specifications for every Product?  | x |  |  |
| 9.2 | Do you supply CoA for each delivered batch? | x |  |  |
|  | *On customer request when agreed by sales DO-IT and communicated on the customer order* |  |  |  |
| 9.3 | Is a CoA delivered with the products?  | x |  |  |
|  | *CoA can delivered by e-mail upon request, when agreed by sales DO-IT* |  |  |  |
| 9.4 | Are CoA's checked against specification on regular basis?  | x |  |  |
| 9.5 | Is the name of producer provided on the CoA?  | x |  |  |
| 9.6 | Do you alert customers in case of changes that may affect the quality of the product? | x |  |  |
| Product standards are developed by producers. The latest versions of standards delivered by producers are maintained in Document Management System on the DO-IT Web. To ensure this information is actual and relevant we control documents by comparing the certificate of analysis to the specifications and applicable legislation. The review of specifications is conducted every 3 years.  |
|  |  |  |  |  |
| 10. | Environmental and Ethical care | yes | no | n/a |
| 10.1 | Does the site comply with all national environmental legislation? | x |  |  |
| 10.2 | Does the site provide safe and healthy working conditions complying with national regulations? | x |  |  |
| 10.3 | Do you respect working conditions as mentioned in standard SA8000? | See part two |
|  |  |  |  |  |
| 11. | Emergency contacts |  |  |  |
| 11.1 | Emergency contact, outside office hours ?  | See part one |

# Part six: General Quality Statement

Our products (are):

* in conformity with the relevant Dutch and EU food laws and regulations;
* organic, in conformity with council Regulation EC 834/2007 and 889/2008 or conform the USDA National Organic Program;
* in conformity with to EU organic legislation 834-2007, 889-2008 on residues of pesticides as interpreted in the guidelines of the Bundesverband Naturkost Naturwaren (BNN);
* free of contaminations in conformity with EC 1881/2006 as amended;
* packed in suitable packaging material (Food Grade), which will be clean, and undamaged;
* not irradiated;
* do not contain any ingredient or additive derived from or produced using GMO’s or their derivatives and all reasonable steps have been taken to avoid contamination from GMO’s or their derivatives. Because there is a presence of GMO pollen in the air, contamination cannot be 100% excluded. Therefore, the maximum of 0.9% stated in the organic regulation applies;
* in conformity with their own technical specifications;
* treated and produced under hygienic conditions and therefore considered free of pathogens above the limits generally recognized as safe;
* may contain small quantities of product own material (like stalk, leaves, etc.) where this is technically unavoidable. These materials will generally be < 7 mm;

Our company is:

* BRC Global Standard for Food Safety (issue 7, January 2015) – certified by TÜV NORD INTEGRA
* Fair Trade IBD – certified by IBD
* Fair Trade – certified by FLO
* Certified by Lloyds to the RiskPlaza Audit+ system which is a private food safety standard for, a.o. the bakery sector, recognized by the Dutch Food Authority
* Certified organic to the EU standard by SKAL (NL-BIO-01)
* Certified organic to the NOP standard by Control Union Certifications
* Signatory and founder member of the Code of Good Organic Practice
* Participant in and founder member of the Dutch BioKAP residue control program

### General disclaimer

All information in this declaration and in our product specifications is given according to our best knowledge. However, this information can be subject to sudden change.

If you (re)pack our products you must do so under conditions that are suitable for the processing of organic food products; are in accordance with the provisions of the EU General Food Law and have safeguards in place to achieve successful detection of any harmful foreign bodies.

If you intend to use our products for vulnerable consumers (the allergenic, infants and young children, elderly citizens or immuno-compromised) you must note that this product is not sold as being specifically suitable for these groups. You are under the obligation to determine suitability for each batch of product bought. We are happy to be of service in this respect.

For any questions related to the use and characteristics of this product, including its possible use in specific applications and the need for this product to conform to other legislation than stated in this specification, you are requested to contact the QA department, on +31 85 487 0487 or quality@organic.nl.

This declaration is valid until further notice via our website (www.organic.nl).

# Part 7: Analytical protocol

DO-IT quality management system and risk analysis describes certain analyses to be done on our products. These analyses are divided in analyses for: residues of pesticides, microorganisms, mycotoxins and certain variable chemical parameters.

Certificates of analysis that are done according to DO-IT analysis protocol are available upon request. Specific customer based analytical requirements can only be fulfilled after prior commercial agreement.

The below paragraph gives some more detail about our testing for residues of pesticides. Please feel free to contact us if you need more detailed information on our other analytical protocols.

## Testing for residues of pesticides

Consumers choose organic products because they trust organic farmers to not use toxic and persistent pesticides that can end up in the food chain.

Organic growers use biological and cultural practices as their first line of defense against pests. Methods include crop rotation, the selection of resistant varieties, nutrient and water management, the provision of habitat for the natural enemies of pests, and release of beneficial organisms to protect crops from damage. The only pesticides that are allowed in organic agricultural must be on an approved use, with restricted use.

Organic crops may however be inadvertently exposed to agricultural chemicals that are now pervasive in rain and ground water due to their overuse during the past fifty years, and due to drift via wind and rain. In the United States alone, more than one billion pounds of pesticides are released into the environment each year.

Organic agriculture is about the process of production, and cannot guarantee that all farm products are free of pesticide contamination that already pervades the planet. And yet, organic farming is part of the solution to reduce reliance on potentially dangerous pesticides and fertilizers highly dependent on oil and natural gas for their production. Supporting organic farmers, no matter where they are on the planet, helps to take care of the water and soil resources.

The way organic foods are grown and processed is more closely monitored than other types of food production, and organic foods must meet or exceed all EU organic regulations as well as all applicable food safety regulations.

As a major importer of organic foods into the European Union, DO-IT takes organic integrity seriously. We have a robust system of testing our products for the accidental presence of pesticide residues. In order to achieve excellence also in this field we work with laboratories that are renowned for their knowledge of pesticide residue analysis and use the lowest limits of detection that are possible within strictly defined quality parameters. Our general analysis matrix is available on request.

If an accidental presence of pesticide residues is found we follow our (possibly) non-conforming goods procedure which is aligned to requirements from our organic certification body Skal, the BRC standard and the Riskplaza Audit + standard.

**Sectoral Organic integrity initiatives**

DO-IT is actively engaged in the field of organic integrity, being one of the founding members of the AntiFraud initiative. More information on this initiative can be found via <https://www.organic-integrity.org/>

# Part 8: Food Defense questionnaire answers

(HCP-S17 GIRA FOOD DEFENSE, to be viewed on site, TACCP)

## Outside security measures

What food defense measures does your warehouse have in place for the exterior of the building?

|  |  |  |  |
| --- | --- | --- | --- |
|  | Yes | No | N/a |
| Are the facility’s grounds secured to prevent entry by unauthorized persons (e.g., by locked fence, gate or entry/exit doors, guard service)? |  | x |  |
| Is there enough lighting outside the building to properly monitor the warehouse at night/early morning | x |  |  |
| Do emergency exits have self-locking doors and/or alarms? |  |  | x |
| Is the outside storage on the premises protected from unauthorized access? |  |  | x |
| Does your warehouse have monitored security camera’s ? | x |  |  |

Are the following secured with locks, seals, or sensors when unattended (after hours/weekends) to prevent entry by unauthorized persons.

|  |  |  |  |
| --- | --- | --- | --- |
|  | Yes | No | N/a |
| Outside doors and gates? |  |  | X |
| Loading dock doors? | x |  |  |
| Windows? | x |  |  |
| Roof and ventilation openings? | x |  |  |
| Trucks and containers ? | x |  |  |

## General inside information

Does your warehouse have food defence measures inside the facility?

|  |  |  |  |
| --- | --- | --- | --- |
|  | Yes | No | N/a |
| Is there an emergency lighting system in the facility | x |  |  |
| Does your warehouse have monitored security camera’s ? | x |  |  |
| Does your building have an emergency alert system that is tested regularly? | x |  |  |
| Are the locations of controls for emergency alert systems clearly marked? | x |  |  |
| Are all restricted areas (i.e., areas where only authorized employees have access) clearly marked? |  | X |  |
| Are visitors, guests, and other non-employees (e.g., contractors, salespeople, truck drivers) restricted to non-product areas unless accompanied by an authorized employee? | x |  |  |
| Does local law enforcement (including the fire department) have up-to-date copies of facility layouts/blueprints? | x |  |  |
| Do you regularly take inventory of keys to secured/sensitive areas of the facility? |  |  | x |
| Are ventilation systems constructed in a manner that provides for immediate isolation of contaminated areas or rooms? |  |  | x |

Are the controls for the following systems restricted (e.g., by locked door/gate or limiting access to designated employees) to prevent access by unauthorized persons

|  |  |  |  |
| --- | --- | --- | --- |
|  | Yes | No | N/a |
| Heating, ventilation and air-conditioning systems ? | x |  |  |
| Propane gas ? |  |  | X |
| Water systems? | x |  |  |
| Electricity  | x |  |  |
| Refrigeration system | x |  |  |
| (Volatile) chemicals |  |  | x |
| Engine/compressor rooms? | x |  |  |

Does your facility have food defence procedures in place for its computer systems

|  |  |  |  |
| --- | --- | --- | --- |
|  | Yes | No | N/a |
| Is the access to the system password-protected? | x |  |  |
| Are firewalls installed into the computer network? | x |  |  |
| Is the system using an up-to-date virus detection system? | x |  |  |
| Are back-ups kept off site? | x |  |  |

Which of the following food defence procedures does your facility have in place for the storage of hazardous materials/chemicals such as pesticides, industrial chemicals, cleaning materials, and disinfectants?

|  |  |  |  |
| --- | --- | --- | --- |
|  | Yes | No | N/a |
| Is the access to inside and outside storage areas for hazardous materials/chemicals such as pesticides, industrial chemicals, cleaning materials, and disinfectants restricted in some manner to allow use by designated employees only?  |  |  | x |
| Is a regular inventory of hazardous materials/chemicals maintained? |  |  | x |
| Are discrepancies in daily inventory of hazardous materials/chemicals (in excess of household use) immediately investigated |  |  | x |
| Is a procedure in place to receive and securely store hazardous chemicals? |  |  | x |
| Is a procedure in place to control disposition of hazardous chemicals? |  |  | x |

## Shipping and receiving security

Does your facility have food defence procedures in place for handling outgoing shipments?

|  |  |  |  |
| --- | --- | --- | --- |
|  | Yes | No | N/a |
| Are outgoing shipments sealed with tamper-evident seals? |  | x |  |
| Are the seal numbers on outgoing shipments documented on the shipping documents? |  |  | x |
| Do you keep records of the above-referenced inspections? |  | x |  |
| Is a bill of lading maintained for all outbound activity? | x |  |  |

Which of the following food defence procedures does your facility have in place for handling outgoing shipments?

|  |  |  |  |
| --- | --- | --- | --- |
|  | Yes | No | N/a |
| Is access to loading docks controlled? | X |  |  |
| Are loaded trailers on the premises maintained under lock and/or seal? |  |  | x |
| Are trailers inspected prior loading and unloading? | x |  |  |
| Is a bill of lading maintained for all inbound/outbound activity? | x |  |  |
| Is advance notification to suppliers (by phone, e-mail, or fax) required for all outgoing deliveries? |  | x |  |
| Are suspicious alterations in the shipping documents immediately investigated? | x |  |  |
| Are all deliveries checked against the roster of scheduled deliveries? | x |  |  |
| Are unscheduled deliveries held outside facility premises pending verification? |  | x |  |
| Are off-hour deliveries accepted? | x |  |  |
| If off-hour deliveries are accepted, is prior notice of the delivery required? |  | x |  |
| If off-hour deliveries are accepted, is the presence of an authorized individual to verify and receive the delivery required? | x |  |  |
| Are outgoing shipments of products required to be sealed with tamper-evident or numbered seals (and documented in the shipping documents)? Are these seals verified prior to transport? |  | x |  |
| Are transportation companies selected with consideration of the company’s ability to safeguard the security of product being shipped? |  | x |  |
| Do the transportation companies perform background checks on drivers and other employees who have access to products? |  |  | unknown |
| Do transportation companies leave the trucks unattended for longer periods of time (several hours/overnight etc) during transport? |  |  | unknown |

## Personnel security

Which of the following food defense procedures does your facility have in place for ensuring that personnel adhere to the security requirements?

|  |  |  |  |
| --- | --- | --- | --- |
|  | Yes | No | N/a |
| Are background or reference checks conducted on all employees and contractors (both permanent and temporary ) |  | x\* |  |
| Do all employees receive training on security procedures as part of their orientation training? | x |  |  |
| Are employees, visitors, and contractors (incl. construction workers, cleaning crews, and truck drivers) identified in some manner at all times while on the premises? | x |  |  |
| Does your facility control access by employees and contractors entering the plant during working hours (e.g. coded doors, receptionist on duty, swipe card, etc.)? | x |  |  |
| Does your facility have a way to restrict temporary employees and contractors (including construction workers, cleaning crews, and truck drivers) to areas of the warehouse relevant to their work? |  | x |  |
| Is an updated shift roster (i.e., who is absent, who the replacements are, and when new employees are being integrated into the workforce) kept by management for each shift? |  |  | x |
| Do you inspect employee lockers? |  | x |  |
| Are employees and/or visitors restricted as to what they can bring (cameras, etc.) into the warehouse/production? |  | x |  |
| Are employees monitored when removing company-provided clothing or protective gear from the premises? |  | x |  |

\*we check references for certain functions, not for all functions

## Security measures

Does you facility have security measures in place for emergency situations?

|  |  |  |  |
| --- | --- | --- | --- |
|  | Yes | No | N/a |
| Are there procedures in place that insure that adulterated or potentially harmful products are held? | x |  |  |
| Are customer complaints investigated? | x |  |  |
| Is reporting of unusual activities encouraged? | x |  |  |
| Are employees able to stop activities to minimize potential food defence incidents  | x |  |  |
| Are reported security breaches (e.g. alarms, suspicion of tempering) investigated? | x |  |  |
| Emergency information is kept up-to-date? | x |  |  |
| A product recall plan is kept up-to-date and periodically reviewed? | x |  |  |
| Key personnel are train in product recall procedures? | x |  |  |

# Part 9: Food Fraud

Food fraud is a growing concern. Organic integrity is an integral part of our quality system. The organic control bodies are also very much aware and alert regarding this topic. The organic sector is the best-controlled food chain available. Nevertheless, a malicious action is never 100% to be avoided. The risk is much lower though than in the conventional food chain. DO-IT has a complete VACCP (Vulnerability Assessment, GIRA Food Fraud) available which is to be viewed on site. The vulnerability of the production/process chain is assessed and measures has been established in our food fraud plan. In particular organic certificates, the correct documentation and analytical pesticide results, guarantee biological integrity within the organic sector.