TRG TECHNICAL POLICY

This policy sets out the baseline standards for suppliers to TRG's UK and Ireland operations. It applies to all food and drink suppliers within the TRG managed supply chain, and should be read in conjunction with the TRG Standard Terms and Conditions. Franchise partner suppliers are managed by our franchise partners and are subject to their separate due diligence process.

1. SUPPLIER ASSURANCE AND APPROVAL

1.1 Policy Statement

The Restaurant Group (TRG) is committed to sourcing products from suppliers that demonstrate the highest standards of food safety, quality, legality, authenticity, sustainability, and ethical conduct.

No supplier shall be approved to supply food, beverage, or food-contact materials to TRG until they have successfully completed the TRG Supplier Approval Process and received formal approval from the TRG Technical team.

Supplier approval is risk-based and shall consider, as a minimum:

- Food safety management capability
- Allergen management
- Product and process risk
- Regulatory compliance
- Supply chain traceability and transparency
- Ethical and environmental performance
- Historical performance and audit outcomes
- Product authenticity and vulnerability assessments
- Business continuity and contingency arrangements

Approval status shall be maintained through ongoing monitoring, performance review, and periodic reassessment throughout the duration of supply.

Failure to meet the requirements of this policy may result in enhanced monitoring, suspension of approval status, delisting or cessation of supply.

1.2 Supplier Approval Requirements

All suppliers shall successfully complete the TRG supplier approval process and registration on the Trade Interchange Supplier Information Management (SIM) platform prior to supply.

The approval process may include:

- Technical due diligence review
- Certification assessment
- Audit report review
- Supplier questionnaires
- Traceability assessment
- Product specification review
- Ethical and sustainability assessment
- Factory visit / audit
- Product risk assessment
- First production approval

Approval requirements may vary depending on supplier risk category, product type, manufacturing location, and supply chain complexity.

TRG reserves the right to request additional information or conduct further due diligence where it is deemed necessary.

1.3 Food Safety Certification

1.3.1 Manufacturing Sites

All food and beverage manufacturing sites supplying products to TRG shall maintain certification against a Global Food Safety Initiative (GFSI) recognised food safety standard.

Accepted certification schemes include, but are not limited to:

- BRCGS Global Standard Food Safety
- FSSC 22000
- IFS Food
- SQF Food Safety Code
- Other GFSI benchmarked standards approved by TRG

The certification scope must explicitly cover the products and processes supplied to TRG.

Suppliers shall provide:

- Current certification
- Full audit report
- Corrective action evidence where applicable
- Subsequent recertification documentation upon issue

Certification status shall be maintained and renewed throughout the period of supply.

TRG expects suppliers to achieve and maintain high audit standards. Where lower grades, significant non-conformances, or certification concerns are identified, suppliers shall submit:

- Root cause analysis
- Corrective action plans
- Continuous improvement plans

Acceptance of suppliers operating below TRG's preferred certification standards shall be by exception only and require site audit, review, and a written approval from the Head of Technical or nominated representative from the TRG Food Technical Team.

1.3.2 Sites Working Towards Certification

In exceptional circumstances, suppliers may be approved prior to obtaining GFSI-recognised certification where:

- A documented business need exists
- An independent food safety audit has been completed
- An acceptable improvement plan is in place
- Approval has been granted by TRG Technical

These suppliers shall be subject to enhanced monitoring and defined certification timescales. Failure to achieve certification within agreed timelines may result in suspension of approval status.

1.3.3 Storage and Distribution Partners

Third-party storage and distribution providers shall maintain certification to:

- BRCGS Storage and Distribution Standard, or
- An equivalent GFSI-recognised certification standard

Where certification is not available, alternative approval mechanisms shall be agreed following risk assessment and approval by TRG Technical

1.3.4 Agents, Brokers and Importers

Suppliers acting as agents, brokers, or importers shall demonstrate effective governance and control of the supply chain.

TRG strongly recommends certification to the BRCGS Agents and Brokers Standard or equivalent recognised scheme.

Where certification is not held, all manufacturing, storage and distribution facilities utilised within the supply chain must be demonstrably approved to recognised GFSI standards.

The agent or broker shall retain full responsibility for ensuring compliance throughout the supply chain.

TRG reserves the right to audit the process and compliance at periodic of increased frequency where it is deemed necessary.

1.3.5 National and International Branded Products

For branded products manufactured under the intellectual property ownership of a third party, the supplier shall provide a formal warranty confirming responsibility for:

- Food safety
- Product legality
- Product authenticity
- Product quality
- Regulatory compliance

TRG reserves the right to request supporting due diligence documentation where necessary.

1.4 Additional Certifications and Assurance Schemes

Suppliers shall disclose all relevant certifications held and provide supporting evidence upon request.

Examples include:

- Red Tractor
- Assured Chicken Production (ACP)
- RSPCA Assured
- Marine Stewardship Council (MSC)
- Best Aquaculture Practices (BAP)
- Rainforest Alliance
- Organic Certification
- Gluten Free Certification
- ISO 14001
- ISO 45001
- RSPO
- RTRS

Certification status shall be maintained and renewed throughout the period of supply.

1.5 Notification of Certification Changes

Suppliers shall immediately notify TRG Technical of any event that may affect certification status or product compliance.

Notification must be provided within 48 hours of:

- Certification suspension

- Certification withdrawal
- Major or critical non-conformance affecting supplied products
- Regulatory enforcement action
- Product recall
- Product withdrawal
- Food fraud incidents
- Significant food safety incidents

Suppliers must provide:

- Details of the event
- Impact assessment
- Root cause investigation
- Corrective and preventative action plan
- Risk assessment for TRG products

TRG reserves the right to suspend supply pending completion of the investigation.

1.6 Ethical Trade and Responsible Sourcing

TRG is committed to ensuring ethical, responsible and sustainable practices throughout its supply chain.

All suppliers shall operate in accordance with applicable labour, human rights, environmental and business ethics legislation and principles.

As a minimum, suppliers shall:

- Maintain registration with SEDEX or equivalent ethical compliance platform
- Complete and maintain supplier self-assessment information
- Support transparency throughout the supply chain
- Demonstrate compliance with modern slavery legislation
- Maintain policies covering:
  - Human rights
  - Modern slavery
  - Anti-bribery and corruption
  - Whistleblowing
  - Environmental responsibility
  - Workplace health and safety

Suppliers shall provide evidence of compliance upon request. Reference should also be made to the TRG Ethical Sourcing Policy and Modern Slavery Statements.

1.7 Sustainable and Responsible Sourcing

TRG encourages suppliers to support recognised responsible sourcing programmes that positively impact producers, communities, biodiversity and environmental outcomes.

Where applicable, suppliers shall seek certification schemes appropriate to the raw material or commodity, such as:

- Rainforest Alliance
- Fairtrade
- Direct Trade
- Organic certification
- RSPO
- RTRS
- MSC
- ASC
- BAP

Suppliers shall be able to demonstrate ongoing improvement in responsible sourcing practices and supply chain transparency.

Please also refer to the TRG Supplier Environmental Policy.

1.8 Local and Regional Sourcing

TRG supports the sourcing of local, seasonal, British and Irish products where commercially, technically, and environmentally viable.

Suppliers are encouraged to:

- Promote local sourcing opportunities
- Support regional producers
- Reduce food miles where appropriate
- Improve supply chain resilience
- Provide transparency regarding country of origin

Consideration shall be given to quality, seasonality, sustainability, availability, and food security when assessing sourcing decisions.

2. ALLERGEN MANAGEMENT

2.1 Policy Statement

TRG recognises that food allergies and intolerances represent a significant food safety risk and is committed to providing accurate allergen information to customers in compliance with applicable legislation.

Suppliers play a critical role in ensuring the integrity and accuracy of allergen information relied upon throughout the TRG business. All suppliers are therefore required to implement robust allergen management systems covering the sourcing, manufacture, storage, handling and distribution of products supplied to TRG.

Suppliers shall ensure that allergen risks are effectively identified, assessed, controlled, and communicated through all stages of the supply chain. Particular emphasis shall be placed on the prevention of undeclared allergens, the management of cross-contact risks, and the provision of complete and accurate allergen information.

2.2 Allergen Information and Product Specifications

Suppliers are responsible for providing comprehensive allergen information for all ingredients and products supplied to TRG.

Product specifications must accurately detail:

- All intentional allergenic ingredients present within the product
- Allergenic ingredients contained within compound ingredients
- Potential allergen cross-contact risks
- Precautionary Alibi Labelling (PAL) for allergen declarations ("may contain" statements)
- Relevant allergen management controls implemented during manufacture
- Any allergen-related processing aids where applicable

All allergen information must be supported by a documented risk assessment and maintained as part of the approved product specification.

TRG relies upon this information to provide customer-facing allergen declarations and therefore any omission, inaccuracy, or failure to disclose allergen risks shall be considered a serious breach of supplier requirements.

2.3. Allergen Risk Assessment

Suppliers shall maintain a documented allergen risk assessment programme covering:

- Raw materials and ingredient sourcing
- Manufacturing processes
- Production scheduling
- Equipment and production lines
- Cleaning and sanitation procedures
- Storage and handling activities
- Distribution and transport operations
- Potential sources of allergen cross-contact

The risk assessment shall evaluate both direct allergen inclusion and unintended allergen presence through cross-contamination.

Allergen risk assessments must be reviewed at planned intervals and updated whenever changes occur that may affect allergen status or cross-contact risks. This must be communicated to TRG Technical and written approval obtained ahead of any changes to products supplied to TRG.

TRG reserves the right to request copies of allergen risk assessments and supporting validation data at any time.

2.4 Management of Cross-Contamination Risks

Suppliers shall implement appropriate controls to prevent allergen cross-contact and minimise the need for precautionary allergen labelling.

Examples of acceptable controls include:

- Physical segregation of allergenic materials
- Dedicated storage areas and equipment where appropriate
- Production scheduling to minimise allergen carry-over
- Manufacture of allergen-free products at the start of production runs
- Validated cleaning and changeover procedures
- Technical sign-off of allergen cleaning activities
- Personnel training and awareness programmes

Robust allergen validation plans must be in place and available for review by the TRG Technical Team.

TRG expects suppliers to implement continuous improvement programmes aimed at reducing allergen cross-contact risks and increasing consumer choice through the removal of unnecessary precautionary allergen statements.

2.5 Precautionary Allergen Labelling

TRG recognises that precautionary allergen labelling may be necessary where a genuine and unavoidable cross-contact risk exists.

However, precautionary statements must only be used following a thorough and documented risk assessment demonstrating that the risk cannot be effectively controlled through manufacturing and hygiene practices.

The use of precautionary statements as a substitute for effective allergen management is not acceptable.

Suppliers are expected to actively review opportunities to remove precautionary allergen declarations through improved process controls, validated cleaning procedures and enhanced manufacturing practices.

2.6 Validation and Verification of Allergen Controls

Where allergen cleaning controls are implemented, suppliers must validate their effectiveness through appropriate testing and verification activities.

Validation and verification activities may include:

- Clearly defined allergen validation plan – this is a must
- Allergen-specific swab testing
- Environmental monitoring
- Production line verification
- Finished product testing (typically first pack / bag / portion produced on a line)
- Independent laboratory analysis

When allergenic ingredients are removed from a recipe, suppliers must demonstrate the effectiveness of allergen removal controls through validated cleaning procedures and ongoing verification.

Where residual allergen cross-contact risks remain, TRG may require routine finished-product testing using a UKAS-accredited or equivalent laboratory.

Test results shall be retained, reviewed and made available to TRG upon request. Any non-conformance identified through testing or verification activities must be immediately investigated and reported to TRG Technical together with agreed corrective and preventative actions.

2.7 Vegan Products and Allergen Controls

Where products are supplied with a vegan claim, suppliers must demonstrate appropriate controls to minimise the risk of contamination from ingredients of animal origin and associated allergens, including milk and egg.

TRG recognises that allergen information is publicly available to customers and therefore expects suppliers to implement enhanced controls that support both vegan integrity and allergen management.

Suppliers should actively work to eliminate avoidable cross-contamination risks that may result in precautionary allergen declarations for milk, egg or other animal-derived allergens on vegan products.

2.8 Change Control and Notification Requirements

Suppliers must notify TRG Technical in advance of any proposed change that may affect the allergen status of a product. Suppliers must seek a written authorisation from TRG Technical prior to change.

Such changes include, but are not limited to:

- Introduction of a new allergen
- Removal of an allergen
- Changes to raw materials or ingredient suppliers
- Manufacturing process changes
- Changes in production location
- New allergen cross-contact risks
- Changes to precautionary allergen labelling

Updated specifications, supporting risk assessments and relevant validation data must be submitted to TRG Technical for review and approval before implementation.

No allergen-related changes shall be introduced into the TRG supply chain without prior written approval.

2.9 Allergen Incidents and Escalation

Suppliers shall immediately notify TRG Technical of any allergen-related incident that may impact the safety, legality or declared allergen status of products supplied to TRG.

This includes:

- Undeclared allergens
- Incorrect allergen labelling
- Allergen cross-contamination incidents
- Product withdrawals or recalls involving allergens
- Failure of allergen verification testing
- Any event that may affect customer safety

Notification must be made as soon as the supplier becomes aware of the issue and must not be delayed pending completion of an investigation.

Suppliers shall provide:

- Details of the affected product and batches
- An initial risk assessment
- Containment actions taken
- Root cause investigation findings
- Corrective and preventative actions
- Recommendations regarding product withdrawal or recall where applicable

2.10 Ongoing Verification and Compliance

Allergen management systems shall be subject to regular review, verification and continuous improvement.

TRG reserves the right to conduct audits, review allergen management documentation, request validation evidence and undertake independent testing to verify compliance with this policy.

Failure to maintain effective allergen management controls, provide accurate allergen information or notify TRG of allergen-related risks may result in corrective action requirements, enhanced supplier monitoring, suspension of approval status or cessation of supply.

3. SUPPLIER RESPONSIBILITIES AND PRODUCT CHANGE MANAGEMENT

Suppliers are responsible for ensuring the ongoing safety, legality, authenticity, quality and sustainability of all products supplied to TRG.

Suppliers shall maintain effective controls throughout their supply chain and ensure compliance with all applicable legislation, regulations, customer requirements and product specifications.

Following product approval, no changes shall be implemented without prior written approval from TRG Technical. This includes, but is not limited to:

- Ingredients or raw material suppliers
- Manufacturing sites
- Country of origin
- Recipe composition
- Allergen status
- Production processes
- Packaging materials
- Nutritional composition
- Shelf life
- Storage conditions
- Distribution methods
- HACCP, VACCP or TACCP assessments

Product specifications shall be reviewed and resubmitted to TRG at least every three years or immediately following any product-related change.

3.1 Traceability and Supply Chain Transparency

All products supplied to TRG must be fully traceable throughout the supply chain.

Suppliers shall maintain systems capable of providing:

- One-step-forward traceability
- One-step-back traceability
- Batch identification
- Stock reconciliation and mass balance verification

For animal protein and agricultural products, traceability must extend to farm / field level or equivalent primary source.

Suppliers shall participate in traceability and mock recall exercises upon request and demonstrate the ability to complete traceability investigations within the timescales defined by TRG.

Suppliers must be able to provide traceability details within 4 hours of request from TRG including out of hours, weekends, Bank Holidays.

3.2 Protein Authenticity and Species Verification

TRG is committed to preventing food fraud and protecting product authenticity.

Suppliers of blended and processed meat products, including burgers, meatballs, mince, sausages and similar products, shall implement controls to verify species authenticity and prevent the presence of undeclared animal species.

Suppliers shall operate a documented DNA testing programme based on risk assessment, with annual testing undertaken as a minimum.

Testing should include, where relevant:

- Beef
- Pork
- Lamb
- Chicken
- Turkey
- Horse
- Goat

Any undeclared species detection exceeding established thresholds must be reported to TRG Technical within one working day together with investigation findings, root cause analysis and corrective actions.

3.3 Animal Welfare

TRG is committed to sourcing animal-derived ingredients from suppliers who uphold high standards of animal welfare. Please also refer to the TRG Animal Welfare Policy.

All animal protein supplied to TRG must comply with all applicable UK and international animal welfare legislation and align with the internationally recognised Five Freedoms of Animal Welfare:

- Freedom from hunger and thirst
- Freedom from discomfort
- Freedom from pain, injury or disease
- Freedom to express normal behaviour
- Freedom from fear and distress

Suppliers are strongly encouraged to participate in recognised assurance schemes, including:

- Red Tractor
- Assured Chicken Production
- RSPCA Assured
- Freedom Food
- Global GAP
- Equivalent independently verified welfare schemes

TRG reserves the right to request evidence of welfare standards and undertake supplier assessments where deemed appropriate.

3.4 Seafood and Aquaculture Requirements

TRG is committed to responsible sourcing of seafood and aquaculture products. Please also refer to the TRG Animal Welfare Policy and the TRG Supplier Environmental Policy.

All seafood suppliers shall complete annual traceability exercises demonstrating:

- Country of origin
- Species
- Catch or production method
- Sustainability status
- Applicable certification schemes

As a minimum:

- Seafood rated 4 or 5 within the Marine Conservation Society Good Fish Guide shall not be supplied
- Wild-caught fish should be MSC certified where possible
- Farmed prawns shall hold a minimum BAP 2-Star certification
- Tuna products must be sourced from approved and sustainable fisheries
- Salmon products shall comply with applicable TRG brand standards and recognised welfare certification schemes.

Suppliers shall demonstrate continuous improvement in sustainable sourcing and traceability.

3.5 Legislative and Regulatory Compliance

Suppliers are responsible for maintaining awareness of legislative developments relevant to the products supplied to TRG.

Appropriate systems shall be established to monitor:

- Food legislation
- Labelling requirements
- Allergen regulations
- Food contact material legislation
- Novel foods
- Sustainability requirements
- Chemical contaminants
- Industry guidance and emerging risks

Suppliers shall proactively notify TRG of any legislative or regulatory changes impacting existing or proposed products.

3.6 Product Claims and Protected Designations

All product claims must be truthful, substantiated and compliant with applicable legislation and industry guidance.

Examples include, but not limited to:

- Gluten free
- Vegan
- Vegetarian
- Low fat
- No added sugar
- Additive free
- Natural
- Handmade
- Aged
- Sustainable
- Regeneratively farmed

Suppliers shall provide supporting evidence and verification data upon request.

Where products reference Protected Designation of Origin (PDO), Protected Geographical Indication (PGI) or equivalent protected status, suppliers must provide evidence demonstrating compliance with applicable certification requirements.

3.7 Nutritional Information

All products supplied to TRG shall be supported by accurate nutritional information.

Nutritional data must be:

- Based upon recognised calculation methodologies; or
- Verified through laboratory analysis

Prior to national launch, nutritional information shall be supported by testing undertaken by a UKAS-accredited or equivalent laboratory.

Suppliers shall work collaboratively with TRG to support:

- Salt reduction targets
- Sugar reduction initiatives
- Calorie reduction programmes
- Public health objectives
- Any other Government / legislative / public health initiatives

while maintaining product quality, safety and consumer acceptance.

3.8 Shelf-Life Validation

All products shall have a scientifically verified shelf life supported by documented evidence.

Shelf-life studies shall consider:

- Microbiological stability
- Chemical stability
- Physical characteristics
- Sensory quality
- Packaging performance

Testing must be undertaken using appropriately accredited laboratories where required.

Suppliers shall clearly define:

- Unopened shelf life
- Opened shelf life
- Defrosted life (where applicable)
- Storage requirements
- Handling instructions

within approved product specifications.

3.9 Ingredient and Raw Material Restrictions

To protect consumer safety and brand integrity, TRG applies additional restrictions to certain ingredients and technologies beyond legislative requirements.

Unless otherwise approved by TRG Technical, the following are not permitted:

- Irradiated foods or ingredients
- Genetically modified food ingredients
- Hydrogenated vegetable oils
- Added trans fatty acids
- Nano-material ingredients without prior approval
- Unpasteurised milk and cheese products (except approved exemptions such as Parmesan and Grana Padano)

Suppliers shall notify TRG before the introduction of any novel ingredient, technology or processing method.

3.10 Additives, Colours, Flavourings and Sweeteners

TRG promotes the use of minimally processed ingredients and seeks continuous reduction in the use of additives where technically feasible.

All additives must comply with applicable legislation and be technologically justified.

Attention shall be given to:

- Artificial colours
- Artificial flavourings
- Flavour enhancers
- Artificial sweeteners
- Southampton Six colours
  - Not permitted in children's food and drink
  - All other food / drink items only permitted with prior technical derogation

TRG reserves the right to prohibit or restrict ingredients that may create reputational, consumer or brand risks, even if permitted by legislation.

Additional brand-specific restrictions may apply.

3.11 Sustainable Commodity Sourcing

Where relevant commodities are used, suppliers shall support responsible sourcing programmes and provide evidence of certification.

Specific requirements include:

- **Palm Oil**: Any palm oil used in TRG products must be certified through the Roundtable on Sustainable Palm Oil (RSPO) programme or equivalent recognised certification scheme.
- **Soy:** Suppliers shall ensure soy ingredients are sourced responsibly. Where soy originates from South America, Round Table on Responsible Soy (RTRS) certification is required.
- **Eggs**: TRG is committed to sourcing cage-free and free-range eggs. Suppliers shall provide evidence supporting compliance with TRG animal welfare requirements.
  Brand specific requirements:
  - Wagamama: all shell and ingredient egg must be free-range

3.12 Supplier Testing and Verification

Suppliers shall operate documented testing programmes based on product risk.

These may include:

- Microbiological testing
- Species verification
- Allergen testing
- Nutritional verification
- Chemical contaminant testing
- Shelf-life studies
- Packaging verification

TRG reserves the right to conduct independent testing and product surveillance through accredited laboratories. Any non-conformances identified shall be investigated by the supplier and appropriate corrective actions implemented

3.13 First Production Approval

TRG reserves the right to attend and assess the first production run of bespoke or newly approved products.
The purpose of first production approval is to verify:

- Product quality
- Food safety controls
- Process capability
- Specification compliance
- Compliance with Brand standards

Following approval, no changes may be made without prior authorisation from TRG Technical.

4 SUPPLIER INCIDENT, COMPLAINT AND RECALL MANAGEMENT

4.1. Policy Statement

TRG is committed to ensuring all products supplied to our businesses consistently meet the highest standards of food safety, legality, quality, authenticity and customer satisfaction.

Suppliers are required to maintain robust systems for the investigation, management and prevention of product complaints, food safety incidents, withdrawals and recalls.

All complaints and incidents shall be investigated thoroughly, supported by documented root cause analysis, and result in effective corrective and preventative actions designed to prevent recurrence.

Failure to respond appropriately or within the required timescales may result in supplier escalation, enhanced monitoring, cost recovery, suspension of approval status or cessation of supply.

4.2. Complaint Management

4.2.1 Complaint Reporting

TRG maintains a formal complaints management process to record, investigate and monitor product-related complaints originating from restaurants, customers, distribution centres and other stakeholders.

Suppliers shall maintain an active account on the TRG-approved complaints management platform and nominate an appropriate technical contact responsible for reviewing and responding to notifications.

The supplier shall ensure contact details are maintained and always updated.

Complaints may include, but are not limited to:

- Product quality defects
- Foreign body contamination
- Food safety concerns
- Specification non-conformance
- Packaging failures
- Labelling issues
- Product integrity concerns
- Consumer dissatisfaction trends

4.2.2 Supplier Investigation Requirements

Upon notification of a complaint, suppliers shall promptly commence a documented investigation.

Investigations shall include, as appropriate:

- Batch and production record review
- Traceability verification
- Manufacturing process assessment
- Raw material review
- Retained sample assessment
- Root cause analysis
- Corrective and preventative action planning

Suppliers shall provide TRG with a written response including:

- Investigation completed to date
- Findings and conclusions
- Risk assessment
- Corrective actions implemented

- Preventative actions planned
- Implementation timelines
- Liability assessment and acceptance where applicable

Where the supplier concludes they are not responsible for the complaint, supporting evidence must be provided.

4.3. Complaint Response Times

The following response standards apply unless alternative arrangements have been agreed with TRG Technical.

Critical Food Safety Incidents

Examples include:

- Potential contamination
- Allergen failures
- Serious food safety concerns
- Significant foreign object contamination
- Product tampering
- Suspected food fraud

The supplier shall:

- Acknowledge the complaint within 4 hours
- Complete immediate traceability assessment
- Provide an initial risk assessment
- Advise regarding potential withdrawal or recall requirements

Foreign Body Complaints

The supplier shall:

- Acknowledge receipt within 48 hours
- Complete preliminary investigation and root cause analysis within 5 calendar days
- Submit corrective actions within 5 calendar days
- Provide final preventative measures once specialist analysis has been completed where applicable

Escalated Complaint Trends

The supplier shall:

- Acknowledge notification within 48 hours
- Provide preliminary root cause analysis within 5 calendar days
- Submit immediate corrective actions and containment measures
- Confirm full preventative action plan within agreed timescales

Product Quality Complaints

The supplier shall:

- Acknowledge notification within 3 working days
- Complete investigation and preliminary root cause analysis within 10 calendar days
- Confirm corrective and preventative actions within agreed timescales

4.4 Complaint Escalation Criteria

TRG operates a risk-based escalation process to identify recurring issues and emerging risks.
Unless otherwise agreed, complaint trends shall be escalated where:

Standard Products

- Three or more complaints of the same defect type
- Across three separate locations
- Within a two-week period

Fresh Produce and Fresh Meat Products

- Five or more complaints of the same defect type
- Across three separate locations

- Within a four-week period

TRG reserves the right to escalate concerns at lower thresholds where:

- Consumer safety may be impacted
- Product legality is questioned
- Brand reputation is at risk
- Emerging trends are identified

4.5. Escalated Complaint Management

Where escalation criteria are met:

- The supplier shall be formally notified by TRG Technical.
- Relevant Procurement, Commercial and Leadership stakeholders may be informed.
- The supplier shall undertake a comprehensive investigation.
- A documented corrective and preventative action plan shall be developed.
- Progress shall be reviewed against agreed milestones.

Suppliers shall provide confirmation of implemented corrective actions within 14 calendar days of escalation notification unless otherwise agreed.

Where concerns remain unresolved, TRG may require:

- Additional technical reviews
- Independent laboratory testing
- Third-party audits
- On-site technical investigations
- Production observations
- Enhanced monitoring programmes

4.6. Product Retention and Evidence Collection

Where products are available, suppliers may request collection of complaint samples for investigation.

Products associated with complaints will normally be retained by TRG for a limited period following notification.

Failure to retrieve or arrange review of relevant materials within the specified timeframe shall not delay closure of investigations or determination of liability.

Photographic evidence, analytical results or other supporting information may be used where physical samples are unavailable.

4.7. Product Withdrawal and Recall Management

4.7.1 Supplier Responsibilities

Suppliers shall maintain documented and tested procedures for product withdrawal and product recall management.

Such procedures shall enable suppliers to:

- Identify affected products rapidly
- Determine production scope and distribution
- Trace products one step forward and one step back
- Assess consumer risk
- Isolate affected stock
- Support communication with regulatory authorities where required
- Coordinate with TRG to minimise consumer and brand risk

Suppliers remain responsible for the safety, legality and compliance of products supplied to TRG.

4.7.2 Incident Notification

Suppliers shall immediately notify TRG Technical of any issue that may result in:

- Product withdrawal

- Product recall
- Food safety alert
- Regulatory enforcement action
- Allergen incident
- Food fraud concern
- Product contamination event
- Product mislabelling

Initial notification shall include:

- Product details
- Affected batches
- Date codes
- Distribution scope
- Initial risk assessment
- Recommended containment actions

Notification must not be delayed pending completion of a full investigation.

4.7.3 Recall Decision Making

TRG shall retain the right to determine whether products supplied into the business require:

- Stock quarantine
- Product withdrawal
- Market withdrawal
- Consumer recall

This decision shall be based upon:

- Consumer safety risk
- Product legality
- Regulatory requirements
- Brand and reputational risk
- Advice from competent authorities

The supplier shall provide all information requested to support decision-making and shall cooperate fully throughout the incident.

4.7.4 Recall and Withdrawal Execution

Where a withdrawal or recall is initiated, suppliers shall:

- Confirm affected batches and quantities immediately
- Support traceability verification
- Complete a timeline investigation
- Conduct a mass balance assessment
- Arrange collection or disposal of affected stock where required
- Supply replacement stock at no cost to TRG
- Support customer and regulatory communications where necessary

TRG reserves the right to destroy or dispose of affected products where collection is not arranged within agreed timelines.

4.7.5 Cost Recovery

Where a withdrawal or recall occurs as a result of supplier failure, negligence or non-conformance, TRG reserves the right to recover reasonable costs incurred, including but not limited to:

- Product replacement
- Distribution costs
- Product disposal
- Laboratory testing
- Investigation costs
- Administration costs
- Third-party support costs
- Regulatory response costs

Additional recovery may be sought for incidents involving undeclared allergens or other high-risk food safety hazards.

Details of applicable charges shall be defined within individual supplier agreements and contractual terms.

4.8 Mock Recall and Traceability Verification

To demonstrate the effectiveness of traceability and incident management systems, suppliers shall participate in recall and traceability verification exercises when requested by TRG.

Suppliers must be capable of:
Within Four Hours
Providing:

- Full batch traceability
- One-step-forward traceability
- One-step-back traceability
- Stock reconciliation and mass balance assessment

Within Twenty-Four Hours
Providing:

- Extended traceability to farm, field, vessel or primary source where applicable
- Confirmation of affected customers and product volumes

TRG may conduct announced or unannounced mock recall exercises as part of supplier assurance activities. Failure to demonstrate effective traceability capability may result in escalation, corrective action requirements, suspension of approval status or additional audit activity

5 PACKAGING AND FOOD CONTACT MATERIALS

5.1 Policy Statement

TRG recognises that packaging plays a critical role in protecting food safety, maintaining product quality, extending shelf life and reducing food waste throughout the supply chain.

All packaging and food contact materials used in products supplied to TRG shall be safe, fit for purpose, legally compliant and designed to protect products from physical, chemical and microbiological contamination during storage, transportation and use.

Suppliers are responsible for ensuring that all packaging materials comply with applicable UK and EU food contact material legislation, regulations and industry standards relevant to the intended use of the product.

5.2 Food Safety and Legal Compliance

All packaging supplied to TRG must:

- Be manufactured from food-grade materials suitable for their intended use.
- Comply with all applicable food contact material legislation and regulatory requirements.
- Be supported by appropriate Declarations of Compliance where required.
- Be suitable for the conditions of storage, handling, preparation and consumption associated with the product.
- Provide adequate protection against contamination, damage and deterioration throughout the stated shelf life.

Packaging shall not adversely affect the safety, composition, quality, organoleptic characteristics or integrity of the food product.

Suppliers shall maintain documented evidence of compliance and make such information available to TRG upon request.

5.3 Packaging Integrity and Contamination Control

Suppliers shall ensure that packaging specifications and manufacturing controls are designed to minimise the risk of contamination.

Packaging materials must not present a risk through:

- Physical contamination, including loose fibres, shreds or fragments.
- Chemical contamination.
- Allergen cross-contamination.
- Microbiological contamination.
- Contamination arising from recycled materials not approved for food contact use.

Appropriate quality assurance, inspection and verification processes shall be implemented to ensure packaging integrity is maintained throughout manufacture, storage and distribution.

5.4 Migration Testing and Chemical Safety

Suppliers shall ensure that packaging materials have been assessed for potential migration into food products where required by legislation or risk assessment.

Appropriate testing shall be conducted to demonstrate compliance with applicable migration limits and food contact material requirements.

Evidence of migration testing, risk assessments and supporting technical documentation shall be made available to TRG upon request.

5.5 Microplastics and Emerging Contaminants

TRG recognises the growing regulatory and consumer focus on microplastics and other emerging contaminants within food supply chains.

Suppliers shall maintain awareness of current and emerging legislation relating to microplastics, food contact materials and environmental contaminants and shall ensure ongoing compliance with all applicable UK, EU and Northern Ireland regulatory requirements. This includes restrictions relating to intentionally added synthetic polymer microparticles where applicable under relevant legislation.

Packaging materials and food contact articles supplied to TRG should be designed and manufactured to minimise the risk of plastic particle migration, environmental release and contamination of food products. Suppliers shall assess risks associated with microplastic contamination as part of their packaging risk assessment and food safety management systems.

Where requested by TRG, suppliers shall provide evidence of risk assessment, regulatory compliance and mitigation measures relating to microplastics and other emerging contaminants.

5.6 Sustainability and Environmental Considerations

TRG is committed to reducing the environmental impact of packaging while maintaining food safety and product integrity.

Suppliers are expected to support this objective by:

- Optimising packaging design and material usage.

- Reducing unnecessary packaging.
- Increasing recyclability and circularity where feasible.
- Reducing virgin plastic usage where appropriate.
- Supporting responsible sourcing of packaging materials.
- Identifying opportunities to improve environmental performance throughout the packaging lifecycle.

Please also refer to the TRG Supplier Environmental Policy.

5.7 Change Control

Suppliers must notify TRG Technical in advance of any proposed change to packaging specifications, including:

- Material composition.
- Food contact status.
- Packaging supplier.
- Manufacturing location.
- Recycled content.
- Printing inks, adhesives or coatings.
- Functional barriers.
- Sustainability claims.
- Labelling or artwork changes.

6 IMPLEMENTATION AND ONGOING COMMITMENT

TRG are committed to working collaboratively with our suppliers to ensure our food is always safe to eat, of the highest quality, and adheres to all relevant legislation, regulations and standards.
We have the right to cease trading with any suppliers who do not follow the requirements outlined above, or who do not show willing to do so.

TRG commits to:

- Review the TRG Technical Policy annually as a minimum and whenever necessary and appropriate
- Work collaboratively with suppliers to implement this policy
- Make relevant employees aware of this policy, and provide relevant training to employees tasked with implementing the policy, as required
- Protect confidential information of suppliers
- Record and monitor supplier level of compliance to the policy

Reviewed/updated: August 2026
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