Gordon FOOD SERVICE	Document Name:	PRODUCT COMPLAINT HANDLING		
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PURPOSE: To describe the GFS system for handling product complaints. This system ensures that quality issues are reviewed, communicated and tracked to facilitate appropriate quality improvement actions and response to GFS Customers. It is important to recognize that the proper and timely handling of Customer product complaints supports the following objectives:

- Safety and welfare of GFS Customers and their Customers
- Customer satisfaction
- Product improvement where needed
- Protection and support of GFS Customers, GFS Suppliers, and GFS

Product complaints may range in degree of seriousness and frequency. Complaints are prioritized as follows:

1. Product safety is first priority and requires appropriate and timely response. This includes complaints involving alleged food borne illness or other personal injury.
2. Complaints that involve issues that may lead to regulatory actions.
3. Multiple non-safety related complaints.
4. Isolated non-safety related complaints.
5. Preference complaints.

SCOPE: This applies to all GFS associates who receive, handle or process product quality complaints on GFS brands, National Brands, and Customer-controlled Proprietary Brands. It also applies to all GFS Suppliers.

1.0 **REFERENCES:** The Product Complaint Form SAP Tile, GFS QA SAP Customer Complaint Report, SOP0602 SAP Product Complaint Management Process

2.0 **RESPONSIBILITIES:**

GENERAL: All GFS associates who receive or handle product quality complaints are responsible to follow this process and utilize the related system tools properly. At worst, failure to follow this process as described may result in harm to the public or individuals involved in safety incidents and it may unnecessarily increase regulatory, legal and/or financial liability for one or more parties. At best, failure to follow this process may preclude an opportunity to improve product quality and maintain Customer satisfaction.

GFS ASSOCIATES receiving product quality complaints must always submit a complaint form to GFS QA with all required and relevant information. If the complaint involves injury or illness a phone call or voice message to the GFS Quality Analyst is also recommended to ensure timely action.

GFS Food Safety Quality Assurance (FSQA) will review, classify and track complaints, as well as ensure timely and appropriate communication and appropriate follow-up. GFS FSQA requires Suppliers to interact directly with the Customer/Complainant to ensure investigation and resolution. GFS FSQA will close complaints when the Supplier or internal GFS function representative has responded that they have reached out to the customer. Complaint history will be monitored to identify multiple complaints and trends and communicated to appropriate GFS function representatives for follow-up.

SUPPLIERS are required to perform a timely and appropriate investigation. Suppliers must contact the Customer, within 2 business days, and provide a follow-up response to the Customer, the 3rd Party Complainant, and GFS Food Safety Quality Assurance. The Supplier will handle any claims directly with the claimant. The Supplier will provide appropriate responses and corrective action information to GFS FSQA via e-mail to facilitate follow-up communication. As deemed necessary by GFS FSQA, Suppliers may be required to perform root cause analysis and implement corrective action plans to prevent a recurrence.

COMPLAINANTS are responsible to seek advice or direction, as they deem necessary, from medical, legal, regulatory and/or health agency professionals. They will directly interact with the Supplier in investigation and resolution of complaint issues. Claims resulting from any given incident must be submitted by the claimant directly to the Supplier and Supplier's insurance carrier.

3.0 IMPORTANT DOS AND DON'TS FOR GFS ASSOCIATES:

- **Do not** offer or attempt to provide medical, health or legal advice to Customers or Complainants. If requested, **do** inform them that GFS is not able to provide this expertise and do direct them to seek appropriate assistance from local medical, legal, regulatory, and or health agency(s) professionals.
- **Do not** promise to handle insurance claims or promise, explicitly or implicitly, that a claimant will be financially compensated. **Do** tell them they will need to work directly with the Supplier and the Supplier's insurance carrier to resolve any claim. The Supplier is responsible for handling claims.
- **Do not** take custody of samples associated with food borne illness or personal injury complaints. Such samples should be held by the Complainant or Customer to handle directly with the Supplier and/or any investigating agency or health professional. GFS does not have the capability to test samples suspected as being associated with food borne illness or perform safety tests.
- **Do not** send samples of non-safety related complaints or foreign material samples to GFS QA without prior approval by GFS QA. For sample submissions to GFS QA, a hardcopy of the Product Complaint Form must accompany samples or the samples must be labeled with the Customer Number, GFS Item number and GFS Associate's voicemail number.
- **Do not** directly contact vendors, or brokers for processing of complaints. **Do** contact GFS QA and **do** provide a completed Product Complaint Form. This will facilitate timely and appropriate response. If the situation is urgent and placing product on-hold & stopping sales is advisable, also contact GFS QA by email to facilitate timeliness of response.
- **Do** provide product date code or lot number wherever possible. This is critical to isolating problem product, facilitating timely investigation/corrective action and minimizing lost sales.

4.0 GFS Home Office FSQA CONTACTS:

Questions regarding complaint handling should be directed to GFS FSQA at quality_assurance@gfs.com

5.0 PROCESS STEPS:

5.1 The GFS Associate receives a product complaint from Customer/Complainant. The GFS Associate clarifies and compiles complaint information via SAP Product Complaint Form which automatically logs the issue in the SAP complaint database.

5.2 GFS FSQA team reviews and classifies product complaints and puts them in process for SAP to send out to suppliers Monday through Friday between 3 and 4pm, local time.

5.2.1 Complaint history for item is reviewed to determine if the incident is isolated or is part of a multiple complaint situation.

5.2.2 The GFS Quality Analyst will classify each complaint and drive appropriate notification, investigation, and resolution. The type of complaint, consequences to Customers, a need to stop sales or place product on hold, as well as GFS' ability to detect problems in current inventory will determine the priority and nature of GFS FSQA versus Supplier role in investigation and follow-up.

5.2.3 The Complaint type is classified for proper handling and tracking.

- **Liability** (Where there is claim of illness, injury, or loss due to a product or its packaging)
- **Product Quality** (Non-liability, dissatisfaction with product quality or performance)
- **Packaging Quality** (Non-liability, dissatisfaction with quality of packaging, packaging error)
- **Preference** (Customer's opinion or comparison, includes non-critical dented can complaints)
- **Internal** (Caused by GFS DC or Transportation)

5.2.4 When a Seafood HACCP item is found to have a food safety issue, the appropriate Seafood HACCP plan will be reviewed to ensure that the plan is still appropriate to control all potential hazards.

5.2.5 For liability complaints involving alleged foodborne illness or personal injury, GFS FSQA reviews the complaint and initiates any required immediate phone and e-mail communication with the Supplier and GFS Liability Manager to request immediate investigation, follow-up with Complainant, and corrective action.

5.2.6 For liability complaints involving a Seafood HACCP item that involves alleged food borne illness or personal injury, GFS FSQA reviews the complaint and initiates any required communication with the

Supplier, GFS QA Seafood HACCP members, and GFS Liability Manager to request immediate investigation, follow-up with Complainant, and corrective action.

5.2.7 For product complaints that are submitted involving a potential allergen or food safety concern, GFS FSQA will review and email the recall_coordinators@gfs.com email address to alert the team about a potential allergen concern and to initiate and investigation.

5.3 GFS Complaint investigation

5.3.1 Where appropriate and when it is likely to aid investigation, GFS FSQA will contact GFS distribution centers to sample/inspect product related to the complaint.

5.3.2 For complaints involving insect infestation, GFS QA will follow these procedures:

5.3.2.1 This applies to National Branded or Gordon Food Service Branded processed food products other than agricultural products*.

* *Agricultural products such as commodity produce (fruits and vegetables), commodity grain products (wheat, rice, corn flour etc.), and processed fruits and vegetables are products of agriculture and as such, may typically contain some level of certain types of insects. For these types of products, unless there is evidence that there is infestation in excess of regulatory product standards, a product complaint will not trigger wider Customer notification or Customer level product withdrawal.*

5.3.2.2 Complaint investigation and response:

a) Investigation of any single or multiple complaints of suspected food product insect infestation (live or dead) will include GFS QA initiating inspection of GFS DC inventory and notification to the Supplier for their prompt investigation, Customer contact, and appropriate corrective action response.

b) If internal or external investigations confirm the existence of insect infestation, or if there are multiple complaints that confirm existence of insect infestation, then Gordon Food Service FSQA may take the following actions as appropriate:

- Direct GFS DCs to quarantine potentially affected inventory to prevent further distribution;
- Collaborate with Supplier to develop a Customer-level withdrawal notification that includes directions for inspection and disposition of potentially affected product in their inventory.
- Initiate GFS recall procedures to notify potentially affected Customers.

5.3.3 Gordon Food Service Store non-compliant inventory complaints: In the event that an item being sold from Gordon Food Service Store(s) lacks necessary labeling elements and/or pack configuration (bulk vs. labeled inner packs) or other non-liability deficiency that impedes the Stores' ability (legally or preferentially) to sell such items, this is the complaint handling protocol:

5.3.3.1 GFS Stores HQ contacts GRQA who will document the issue and if it is a multiple complaint, will initiate DC-level inspections to determine the extent of the issue. GR FSQA will then report the DC findings to GFS Stores HQ.

5.3.3.2 If the item is controlled usage for Gordon Food Service Stores only, GFS Stores HQ can then decide whether to continue to sell the product as is, or direct GR QA to have all non-compliant product put into Return To Vendor status

5.3.3.3 If the item is open to street sales, GFS Stores HQ must consult with the Merchandising & Marketing Service Center to make a joint decision on the disposition of the product. whether to leave the the product in DC inventory or put into Return To Vendor status. GFS Stores HQ and Product Marketing are responsible to collaborate to reach a decision in a timely manner and to advise GFS FSQA of their decision.

5.3.3.4 If their mutual decision is to place non-compliant product in Return To Vendor status, Home Office FSQA must be notified and will direct the DCs accordingly.

5.3.3.5 If the decision is to continue to sell the product, Home Office FSQA must be notified and will direct the DCs accordingly. GFS Stores HQ has the option to place the item on "No Purchase" in their systems until the non-compliant inventory is depleted through street sales.

5.3.4 Produce complaint handling process:

5.3.4.1 Produce Complaints should be reported as soon as possible through the SAP Complaint Form to ensure prompt resolution for these highly perishable items.

5.3.4.2 For complaints involving food safety, defective packaging or foreign material, the Supplier is responsible to follow-up and respond to the Customer.

5.3.4.3 For produce quality complaints (discoloration, spoilage, mold, excessive wetness, etc), the Home Office FSQA will forward the complaint to the appropriate Divisional/Regional Contact, and the divisional Produce inspector. The CDS will then be responsible for contacting the Customer with the response from the Produce Inspector's findings. The Supplier is not responsible for responding to the Customer for produce quality complaints.

5.3.5 Complaint closing decision tree:

Type of complaint	Is a Supplier response required to close complaint?
Any complaint involving a GFS Brand product (except Internal or Preference)	Yes[1]
Any complaint involving a National Brand product (except Internal, Preference, or controlled or restricted items)	Yes[1]
Any product quarantined in GFS DCs due to quality or safety concerns	Yes[1]
Preference complaints	No[1]
Internal GFS issues (mispicks, mis-slot, and missed pulls due to dates or quality)	No[2]
Produce quality complaints	Yes[2]
Any complaint on a National Brand controlled usage or restricted item	No[3]

Yes[1]: These types of complaints may only be closed out when GFS QA receives an appropriate Supplier response.

Yes[2]: These types of complaints may only be when GFS QA receives a response from the divisional Produce inspector.

No[1]: These types of complaints will be closed when they have been entered into our database and forwarded to the appropriate Supplier.

No[2]: These types of complaints will be closed out when they have been entered into our database and forwarded to the appropriate GFS DC function for their investigation and corrective action.

No[3]: These types of complaints may be closed when they have been entered into our database and specified communications sent.

5.3.6 For situations where product is determined "unfit for sale" from a food quality or safety standpoint, the product will be placed in Return To Vendor or Hold status by DC Inventory Control at the direction of FSQA.

5.4 Home Office FSQA will initiate communication to the Customer, Complainant, the GFS Associate who submitted the complaint (and others, if specified), and the Supplier.

5.5 The Supplier is required to contact the Complainant and initiate appropriate investigation within 2 business days of receiving the complaint. GFS QA may provide the Complainant with Supplier contact information to

ensure that the Supplier and Complainant are interacting to resolve the issue. The Supplier provides a response including any appropriate corrective action to the Customer, Complainant, and GFS FSQA. The response to GFS FSQA must be emailed to facilitate internal GFS communication.

5.5.1 The Supplier handles any claims directly with the claimant.

5.6 If the Supplier has contacted the customer the complaint is closed out by GFS FSQA.

5.7 GFS FSQA maintains the SAP Complaint Data with the Supplier response date. Any Suppliers with "open" complaints that are more than 2 business days old will receive a Reminder email to reinforce the requirement upon them to provide timely and satisfactory response to Customer and GFS.

<u>OVERVIEW OF THE GFS PRODUCT COMPLAINT PROCESS</u>

1. GFS Associate (Sales Rep, Inside Sales Rep, Customer Service, GFS Stores, DC employee) completes GFS product complaint form in SAP Fiori.

2. GFS Associate submits the form electronically to GFS FSQA.

3. GFS QA receives the electronic complaint form, identifies the appropriate complaint category type and identifies any urgent action that is necessary, such as a DC inventory check.

4. GFS QA determines the need for QA Specialist involvement using criteria based on:
   a. Repeated complaints in a 30 day period for the same item/Supplier
   b. GFS or national brand
   c. Nature and seriousness of complaint

5. GFS FSQA communicates complaint data to the Supplier via email including the time-frame and documentation expectations for follow-up and resolution. The Submitter (and others specified on the form) are included in this communication.

6. Once the Supplier communicates that they have made contact with the customer, GFS FSQA will close the complaint (with date). If corrective action and a resolution are found, that can be sent to GFS FSQA, who will review the information.

7. If the Supplier does not confirm Customer contact within 2 business days, then the SAP Complaint system will send a reminder email to the Supplier, including the Submitter (and others specified on the form) on this communication. The reminder emails will continue daily until there is confirmed Customer contact. Continued lack of response will result in escalation to leadership for conversation and resolution.

Description of Revision	**Revisor**
Removed phone number for GFS contact Simplified collaboration outlined in 5.3.3.3 Remove reference in 5.3.4 that QA will submit produce complaints Change reference from Quality Analyst and GR QA to Home Office FSQA Changed response timeline from 48 hours to 2 business days	Sara Aranda