## OBJECTIVE

The purpose of this program is to document control measures used to minimize the risk of product contamination.

## 1.0 SCOPE

1.1 This policy applies to **ALL** staff, contractors and visitors entering the facility.

## 2.0 DEFINITIONS

n/a

## 3.0 REFERENCES

3.1 EELE-027 Corrective and Preventative Action (CAPA) Program

3.2 EPOL-002 Captive Clothing & Footwear Policy

3.3 GELE-016 Change Management

3.4 GHRP-020 Attendance Policy

3.5 GPOL-008 Glass, Hard Plastic & Wood Control Program

## 4.0 POLICY

4.1 **General**

4.1.1 Anyone entering the facility is subject to the following requirements. This includes management, maintenance, sanitation, contractors, or visitors.

4.1.2 Visitors and contractors are the responsibility of the employee they are working with and must follow these guidelines.

4.1.3 These requirements apply regardless of line status (e.g., running, cleaning, idle). In instances where a deviation from this policy is requested e.g., line is down for major repair, the change management procedure must be followed. Refer to GELE-016 Change Management.

4.1.4 Entry from the exterior of the facility must be through the main front entry only. No other access from the exterior of the facility is permitted without prior written approval from a member of the QA Department.

4.1.5 The following items are general hygienic practice requirements:

- **All individuals entering the processing and storage areas from the break room must wash and sanitize their hands first (this is in addition to washing hands after using the restroom).**
- Ideally Lab coats or coveralls should be put on first, followed by hair net, beard net and lastly shoe covers.
- Product handlers must take all practical measures to make sure they do not contaminate product, e.g., with cosmetics, sweat etc. Staff should not sneeze, blow or cough over unprotected product or surfaces likely to come into contact with product e.g., packaging or equipment.
- Any machine tools or other items used on product contact surfaces must be cleaned and sanitized prior to use using the approved cleaning procedure or when they have fallen on the floor or contaminated in any way.
- Scoops and other utensils used for product contact must be protected from contamination by storing in a clean, designated container when not in use. Prior to using product contact scoops and/or utensils, operators must ensure they have changed into new gloves or sanitized existing ones. This is especially important if operators have touched unsanitary objects or surfaces with their gloves.

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- All unessential materials should be removed from the processing areas and should be discarded or stored in the designated locations (e.g., Tools, equipment, or packaging material, etc.), after use.
- Cardboard is not to be placed onto working surfaces.
- Ingredients, packaging, or product contact equipment must not be stored directly on the floor. A clean pallet with a clean cardboard slip sheet or plastic can be used.
- **All ingredients, work-in-progress, minors etc. must be identifiable at all times with a lot number and name of material.**
- **All ingredients, work-in-progress, minors etc. must be protected at all times, typically by covering open containers with a clean plastic bag or lid or sealing a part bag.**
- Employees should not go into other processing rooms unless specifically required as part of their job.
- All doors should be closed at all times when not in use in order to minimize cross contamination.
- Tobacco use is prohibited on Company Foods property.
- Staff must not sit on the ground, concrete steps, walkways, equipment, pallets, or packaging materials.
- Employees that are reassigned to work in a processing area after working in an area that could cause uniform to be contaminated (e.g., baler or compactor area) must first change into a clean uniform. A clean uniform must also be used when moving into a processing area after working with product that contains an allergen to product that does not contain that allergen.
- HOLD stickers must not be removed except by authorized staff.
- All individuals must abide by all posted signage with regards to restricted access areas and thoroughfares.

4.2 **Prohibited Items**

4.2.1 Glass, brittle plastic, or ceramic items (e.g., coffee cups etc.) must not be brought into product/packaging storage or processing areas. Line operators who require glasses (spectacles) must take extra precaution to ensure glasses do not accidentally fall into the product. If a breakage occurs the affected product and area should be isolated and a supervisor notified immediately so that the glass breakage procedure can be implemented (Refer to GPOL-008 Glass, Hard Plastic & Wood Control Program).

4.2.2 Jewelry or watches, except for plain wedding bands or medical alert bracelets/necklaces, are not permitted in the storage or processing areas at any time. Glitter and rhinestones are also prohibited.

4.2.3 Heavy makeup, nail polish, false nails or false eyelashes are not permitted in processing areas.

4.2.4 Strong perfumes and colognes are not permitted to be worn in processing areas.

4.2.5 Where possible the use of pins, clips and thumb tacks should be avoided.

4.2.6 Unapproved chemicals are not permitted e.g., correction fluid, dishwashing liquid etc.

4.2.7 Equipment, tools, or utensils that are not issued by Company Foods are not permitted e.g., pocketknives etc.

4.3 **Cell Phones**

4.3.1 Personal cell phones are restricted to the offices and break areas only and are not permitted in processing or warehouse areas.

4.3.2 Employees, who have been issued with a cell phone by Company Foods, are authorized to use the phone in the production and warehouse areas in accordance with Company Foods' guidelines regarding cell phone usage.

4.4 **Clothing, Shoes, Hair Coverings & Gloves**

4.4.1 All persons entering the facility must comply with the requirements outlined in EPOL-002 Captive Clothing & Footwear Policy.

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4.5 **Cleaning Hands**

4.5.1 While in uniform or approved apparel, all individuals must clean their hands in the correct manner in the following situations:

1. Immediately prior to entry to the facility from the break room
2. Immediately after using the toilet
3. Immediately after sneezing, coughing, using a handkerchief/tissue
4. After touching surfaces which are likely to be contaminated e.g., floors, garbage containers etc.

4.6 **Eating & Drinking**

4.6.1 No food or drink including candy or chewing gum is to be taken into or consumed in the facility with the exception of the break room. Product sampling for sensory analysis is permitted in the break room only.

4.6.2 Spitting is prohibited on Company Foods property.

4.6.3 Employees are not permitted to chew toothpicks, matchsticks etc. while in the factory.

4.6.4 It is possible that allergens may be present in the break room (from food brought in by employees) and the products available from the vending machines. To minimize the risk of allergen cross contact between the break room and the plant, employees must ensure that uniforms/apparel that has become soiled whilst eating must change into a clean uniform prior to reentering the storage or processing areas.

4.7 **Infectious Disease Control**

4.7.1 To prevent microbial contamination of product and product contact surfaces, employees, visitors, or contractors who are, or think they are, suffering from an illness, infection, open lesion, boil/s, or any other communicable disease e.g., gastroenteritis, or are a carrier of a food-borne disease, are not permitted in the processing or storage areas. Symptoms may include diarrhea, dark urine, fever, vomiting, sore throat accompanied by a fewer or jaundice.

4.7.2 Employees, contractors, or visitors must cease handling of any product and notify their supervisor if they have or there is a reasonable possibility that they have a health condition as described in clause 4.7.1 above. Where personnel have been assigned other duties, all practical measures must be taken to prevent product and other employees from being contaminated.

4.7.3 In instances where contact with product or a product contact surface has occurred with someone displaying a health condition as described in clause 4.7.1, a risk assessment should be conducted by the QA Department to evaluate the potential impact of product contamination. Incidents must be evaluated in accordance with the procedures outlined in the Corrective and Preventive Action (CAPA) Program (EELE-027).

4.7.4 In accordance with the Attendance Policy (GHRP-020) a doctor's release or other appropriate documentation prior to being allowed to return to work may be required for any absence in excess of two (2) workdays.

4.8 **Trash**

4.8.1 Trash must be contained in designated bins. These bins must not be placed on working surfaces or handled by employees other than those designated to handle trash.

4.8.2 Employees handling trash must ensure hands are cleaned and sanitized prior to handling product or equipment surfaces.

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4.8.3 Packaging normally used for finished products e.g. bags, drums, totes must not be used for any other purpose, including trash.

4.9 **Contractors & Visitors**

4.9.1 Contractors and visitors are the responsibility of the employee they are working with and must follow the guidelines outlined above.

## 5.0 RESPONSIBILITIES

| Position | Responsibility |
|---|---|
| All personnel, contractors & visitors | • It is the responsibility of all staff to ensure that the above requirements are followed. Failure to adhere to any of the requirements will result in disciplinary action. |

## 6.0 RECORDS

n/a

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