

Group Food Integrity Policy

Avoiding the adulteration, and the presence of unauthorised residues/contaminants in the raw materials we purchase and the food products we produce is of paramount importance to Cranswick Group and our customers. Like all organisations, Cranswick could be vulnerable to the risks associated with any false or misleading claims made about the products we produce, and the raw materials we use. Such risk can occur at the site of manufacture or within our supply chains.

Typical brand integrity claims may include, but are not limited to:

- Specific Protein Species
- Suitability of product for specific dietary requirements (e.g. "Suitable for Vegetarians")
- Country of Origin or Regionality
- Welfare Standard
- Specific Breed / Variety
- Process Claims
- Allergen free claims (e.g. "Gluten free").

We and our suppliers are committed to ensuring compliance with specified legislative limits and are supportive of industry best practice. We recognise that all organisations can be faced with the risks associated with wrongdoing, misconduct, dishonesty and fraud, these may take place either within their own organisation or within their supply chains. Cranswick are therefore committed to a process that will identify these risks, assess the likelihood that these could occur, and will develop, implement and maintain mitigation strategies to avoid the potential impact that such events may have on our business and the customers and stakeholders we serve.

These impacts may include:

- Food fraud resulting in compromised food safety and product integrity.
- Financial loss.
- Damage to our reputation and brands.
- Negative publicity.
- Cost of investigation.
- Loss of employees and customers.
- Damaged relationships with customers, contractors and suppliers.
- Litigation.
- Damage to business morale.

To safeguard and protect our business and stakeholders we are committed to the deterrence, detection and correction of misconduct and dishonesty. The discovery, reporting and documentation of such acts provides a foundation for the protection of innocent parties, the taking of disciplinary action against offenders, the referral to law enforcement agencies when warranted by the facts, and the recovery of assets. We are also committed to maintaining a business culture based on fairness, ethics and honesty for our employees, customers, suppliers and others with whom we have a relationship.

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All our suppliers/producers are approved prior to supply and, by signing the Cranswick Technical Conditions of Supply, have warranted that they meet all the legislative requirements relevant to the raw material being supplied (protein, ingredient & food contact packaging). It is a specific requirement that should our suppliers suspect that the raw material being supplied is contaminated that they must inform Cranswick without delay so that we can agree the corrective action to be taken to safeguard the authenticity, safety and integrity of the raw materials we purchase and the food products we produce. In the case of pesticides and medicinal residues our producers will operate recognised withdrawal periods prior to the animal/bird entering our supply chain. The screening of proteins for the presence of medicinal residues is controlled by the Food Standards Agency and test results issued by the Veterinary Medicines Directorate are reviewed when published.

To reduce our vulnerability, we utilise an integrated vulnerability risk assessment process on all our suppliers and raw materials to assess the severity and likelihood of potential risk of adulteration, substitution or contamination so we can establish appropriate screening systems to check compliance. This process shall be based on TACCP, or a similar risk-based approach, that will be completed by a trained, multi-disciplined team at each of our manufacturing sites. Our supply chains will be similarly risk assessed by our Group Technical Services Team. Through this integrated approach we will highlight any ingredients or manufacturing processes where the integrity of a claim is potentially at risk. All our “at risk” raw materials are subjected to a traceability challenge back to originating source, where this involves primary raw material then that trace shall go back to farm. Where vulnerabilities are highlighted, we shall introduce and maintain appropriate counter measures to ensure that this is effectively managed to avoid adverse implications to the brand integrity of our business, customers, and the stakeholders we serve.

We are committed to maintaining horizon scanning protocols to ensure that we are aware of, and proactive in, managing our vulnerability to new and emerging risks within our supply chain, the ingredients we use, and the products we manufacture.

Cranswick are members of FIIN, the Food Industry Intelligence Network, established in 2015 to help ensure the integrity of food supply chains and protect the interests of the consumer. The network addresses the recommendations of the ‘Elliott Report’ to establish a ‘safe haven’ to collect, collate, analyse and disseminate information and intelligence.

We will ensure that the processing sites we own are well invested and that monitoring procedures are in place to ensure that the fabric, equipment and manufacturing environment are maintained so that the potential for foreign body inclusion is controlled to appropriate levels of control. All processing lines will be equipped with on-line metal detection which can operate at best detectable limits for ferrous, non-ferrous and stainless-steel contaminants. Where risk assessment highlights the necessity, we will introduce X-ray detection systems on our processing lines.

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Our manufacturing sites shall have procedures in place to restrict the movement and storage of wood/packaging to specified areas where the risks of potential food cross contamination can be controlled. We will restrict the use of glass or clear Perspex in food processing areas, but where this is unavoidable all items shall be listed on a register and the condition of these items shall be monitored at a risk assessed frequency. Where damage occurs, the risk to product shall be assessed, and appropriate action taken as detailed within documented breakage procedures.

It is the responsibility of every employee of our business to report suspected misconduct or dishonesty to their immediate superior or via the company Whistleblowing care line.

In order to validate the effectiveness of our procedures to protect brand integrity, we will ensure that robust internal audit systems are maintained and that relevant employees receive appropriate training.

This policy will be communicated to all employees and reviewed annually to ensure it remains current and relevant to our business.

For CranSwick plc:



Adam Couch
Chief Executive
May 2021

Business Unit Director:

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