

Supplier Technical Requirements and Food Policy

Brand Policies and Procedures

This Policy sets out the baseline standards for The Restaurant Group as a whole. Individual divisions or brands within the Group may choose to adopt further policies and procedures, or implement additional requirements, provided they are not inconsistent with this Policy.

Contents			
1. Pre Supply Approval of Suppliers	1	2. New Product Submissions	3
1.1 Certification	1	2.1 Specification	3
1.1.1 Food	1	2.2 Named Ingredients	3
1.1.2 Agents and Brokers	1	2.3 Claims	4
1.1.3 Storage and Distribution	1	2.4 Nutritional Data	4
1.1.4 National/International brands	1	2.5 Trademarked Ingredients	4
1.2 Ethical Trading	2	2.6 Salt Reduction	4
1.3 Local Sourcing	2	2.7 Sugar Reduction	4
1.4 Allergens	2	2.8 Calories Reduction	4
1.5 The Environment	2	2.9 Shelf life	4
1.6 Specific requirements for Suppliers of Protein	2	3. Ongoing assessment of suppliers	4
1.6.1 Traceability	2	3.1 Audits and Visits	4
1.6.2 Species Analysis.	2	3.2 First production runs of bespoke lines	4
1.6.3 Animal Welfare	3	3.3 Complaints	5
1.6.4 Fish	3	3.4 Testing and Surveillance	5
1.7 Legislative updates	3	3.5 Supplier Technical Assessments	5
		3.6 Microbiological Testing	5
		4. Food Policy	5
		4.1 Legislation	5
		4.2 Vegetarian	5
		4.3 Vegan	5
		4.4 Food Additives	5
		4.5 Artificial Colours	6
		4.6 Irradiated Foods and Ingredients	6
		4.7 Genetically Modified Foods	6
		4.8 Nano technology	6
		4.9 Hydrogenated Vegetable Oils	6
		4.10 Trans Fatty Acids	6
		4.11 Palm Oil	6
		4.12 Soya	6
		4.13 Unpasteurised Cheeses	6
		4.14 Egg	6

The following requirements should be read in conjunction with TRG Standard Terms and Conditions

1 Pre-Supply Approval of Suppliers

1.1 Certification

1.1.1 Food

It is a minimum requirement of any supplier or manufacturing site supplying TRG to maintain certification to the BRC Global Food Standard and provide a current report and certificate showing achievement of Grade AA* - B of the BRC Global Standard for Food Safety or equivalent GFSI recognised scheme, with the scope including the products to be supplied and this must be maintained throughout the period of supply. Copies of certificates and reports must be provided to TRG via Trade Interchange, or any other system defined by TRG in future as systems may change from time to time.

Copies of any additional accreditations held by the supplier should be provided to TRG, Red Tractor, ACP, Gluten Free, MSC, BAP, ISO 14001 etc.

If you lose certification for any reason this must be notified to TRG immediately, within 48 hours of the certification being suspended or withdrawn.

1.1.2 Agents and Brokers

TRG fully endorse the BRC Agents and Brokers Standard, any supplier providing product sourced from multiple supplying locations should obtain the Agents and Brokers standards as a prerequisite to supply, alternatively all manufacturing sites and storage and distribution services must hold BRC certification or equivalent GFSI recognised scheme.

1.1.3 Storage and Distribution

For storage and distribution operations, suppliers must be certified to the BRC Storage and Distribution or equivalent GFSI recognised scheme.

1.1.4 National/International brands

Suppliers must provide a warranty statement, taking full responsibility for the food safety of the branded product supplied.

1.2 Ethical Trading

TRG require all suppliers to register with and align internal policies to the core values of Sedex. Sedex, the Supplier Ethical Data Exchange, is a not-for-profit membership organisation dedicated to driving improvements in responsible and ethical business practices in global supply chains. Sedex offers a simple and effective way of managing ethical and responsible practices in the supply chain through a secure, online database which allows members to store, share and report on information on four key areas: Labour Standards, Health & Safety, The Environment and Business Ethics.

TRG require all suppliers to complete the supplier assessment questionnaire within Sedex.

Where available for the product category being provided to us e.g., Sugar, Cocoa, Tea or Coffee, Fairtrade products should be shown as we are committed to support farmers throughout the global supply chain.

1.3 Local Sourcing

Where possible and in season we expect suppliers to promote the use of British produce.

1.4 Allergens

In accordance with legislation TRG provides customers with allergen information. All suppliers are required to have allergen management controls in place for the manufacture of food products. Detailed information of the product, raw materials, process and the risk of cross contamination of allergens must be detailed within the specification. We expect a detailed risk assessment to be conducted in regard to any may contain labelling within the specification. This document will be required for review periodically.

1.5 The Environment

As a responsible business TRG monitors the impact of our business on the environment and identifies initiatives to reduce this impact.

We expect all suppliers to have in place an Environmental Policy detailing current position and future plans to safeguard the environment. Suppliers are expected to share the learnings of implemented initiatives and future plans with TRG.

We require all suppliers to review the packaging format of cases delivered to TRG to ensure that where possible packaging is minimised whilst remaining functional.

1.6 Specific requirements for Suppliers of Protein

1.6.1 Traceability

All product supplied to TRG must be fully traceable back to the farm. Prior to supply a full traceability exercise must be completed, this will provide an approved supplier listing for protein raw materials (Any changes to specification without notification will result in supplier penalties). If new raw material suppliers require listing the Technical Manager must be notified prior to supply to grant approval.

1.6.2 Species Analysis.

TRG requires that its suppliers ensure all burgers, meatballs and products containing comminuted meat (e.g., lasagne, chilli etc.) have in place a validated means of ensuring absence of undeclared species within our supply chain. All suppliers of meat, comminuted and processed meat products (including burgers, meatballs, mince and products, sausages etc.), must complete PCR tests for all protein products quarterly. The quarterly DNA testing should be a minimum of 7 species screening namely Beef, Pork, Lamb, Chicken, Turkey, Horse and Goat. If in doubt as to whether your product falls under this policy, please contact TRG Technical.

Results must be communicated to the TRG Technical Team quarterly.

Any detections identified greater than 0.01% which do not form part of the recipe must be notified to TRG within 1 working day of result along with investigation findings.

1.6.3 Animal Welfare

All animal protein supplied to TRG must meet retained EU and UK legislation and adhere to the principles of the Farm Animal Welfare Council (FAWC) Five Freedoms for animal welfare.

TRG strongly encourages suppliers to sign up to industry approved schemes such as Freedom Foods, Assured Chicken Production (A.C.P.) Red Tractor, or equivalent which focus on animal welfare and good husbandry techniques.

We will aim for our suppliers by 2026 to meet the following European Broiler ASK requirements for 100% of the fresh, frozen, and processed chicken in our supply chain:

1. Comply with all EU animal welfare laws and regulations, regardless of the country of production.
2. Implement a maximum stocking density of 30kg/m² or less. Thinning is discouraged and if practiced must be limited to one thin per flock.
3. Adopt breeds that demonstrate higher welfare outcomes: either the following breeds, Hubbard JA757, 787, 957, or 987, Rambler Ranger, Ranger Classic, and Ranger Gold, or others that meet the criteria of the RSPCA Broiler Breed Welfare Assessment Protocol.
4. Meet improved environmental standards including:
 - At least 50 lux of light, including natural light.
 - At least two metres of usable perch space, and two pecking substrates, per 1,000 birds.
 - On air quality, at least the requirements of Annex 2.3 of the EU broiler directive, regardless of stocking density.
 - No cages or multi-tier systems.
5. Adopt controlled atmospheric stunning using inert gas or multi-phase systems, or effective electrical stunning without live inversion.
6. Demonstrate compliance with the above standards via third-party auditing and annual public reporting on progress towards this commitment.

1.6.4 Fish

TRG strongly supports the use of the Marine Conservation Society's definitive guide to sustainable seafood sourcing and should be used for TRG products. The mission of the MCS is "To drive political, cultural and social change for healthy seas and coasts that support abundant marine wildlife, sustainable livelihoods and enjoyment for all".

All TRG seafood should fall into the advised rating 1-3 for choosing the most environmentally sustainable fish. We achieve this by sourcing MSC certified wild caught fish and BAP 2* and above certified farm fish (or Global GAP equivalent).

1.7 Legislative updates

Each supplier should be subscribed to information feeds to ensure they are updated on emerging topics and changing food legislation, we expect suppliers to notify us of any changes or issues affecting TRG products.

2.0 New Product Submissions

TRG reserves the right to check all claims made at the supplier's cost.

2.1 Specification

A full TRG specification is required to support any product launch which will be sent to you prior to setup. Photo standards and process flow must be entered post first production.

For recognised branded items a reduced specification will be accepted on agreement with TRG.

2.2 Named Ingredients

Where an ingredient is specifically named in the title or in the sub-description of a product, the percentage of those ingredients must be at least in line with QUID legislation of the total ingredients (mixing bowl stage).

Food names for which a protected status has been granted by the EU via a Protected Geographical Indication (PGI) or Protected Designation Origin (PDO) must only be used for foods which comply with the terms of the approval. Suppliers shall provide evidence to TRG that their products meet these criteria.

2.3 Claims

Any claims made about food products e.g., low fat, additive free, homemade, aged steak must be substantiated. Evidence to support such claims should be provided at time of submission.

2.4 Nutritional Data

Each food product requires nutritional information and is required to be supported with a relevant certificate from a UKAS accredited laboratory. The certificates need to be submitted to your Technical Manager. Samples should be tested in the state they are supplied to TRG unless by exceptional request.

2.5 Trademarked Ingredients

Any items supplied to TRG containing reference to a licensed trademark must have supporting documentation from the trademark license holder permitting use and future use on menu. This includes, for example, Vegan Society, Coeliac Society schemes.

2.6 Salt Reduction

Suppliers must work with TRG to find ways to reduce the salt in our dishes to meet the Public Health England salt targets. TRG requires products supplied to comply with the PHE 2017 Salt targets, unless there is a technical or safety reason why they can't. Where there is a target and a maximum level, suppliers are required to work towards the target levels. Now that new salt targets have been published suppliers are expected to work to achieve the 2024 standards.

2.7 Sugar Reduction

Suppliers must work with TRG to find ways to reduce the sugar in our dishes to meet the Public Health England 2024 sugar reduction targets. Any new products providing sugar to children's diets will need to meet the guidelines.

2.8 Calories Reduction

When guidelines are published, suppliers must work with TRG to find ways to reduce the calories in our dishes to meet the Public Health England Calorie Reduction targets.

2.9 Shelf life

Suppliers are required to conduct suitable microbiological, chemical and organoleptic examination of all bespoke products and to provide a technical reasoning for the measured data. This should be provided to TRG Technical team together with a stated shelf life for the product, as part of the product specification.

New bespoke lines will be tested for full nutrition breakdown and microbiological screen by a UKAS accredited laboratory at supplier cost, results will be shared with suppliers.

3.0 Ongoing assessment of suppliers

3.1 Audits and Visits

Once approved, suppliers are plotted on a risk assessment matrix to determine the frequency of ongoing audits and visits required to ensure the safe supply of product to TRG. TRG will notify suppliers requiring audit 2 months in advance. Audits must be scheduled during production of TRG product. The visit will focus on Product Quality, Safety and Legality. Suppliers are required to pay for expenses associated to the audit which will be agreed in advance.

Any non-conformances raised as part of the audit will require corrective action evidence to be submitted to TRG within 28 days of the audit via Trade Interchange or other audit management system. If any critical non-conformances are identified a re-audit will be scheduled at the cost of the supplier.

In order to verify traceability systems suppliers will be contacted to carry out a mock traceability exercise. It is expected that within 4hrs a one step forward and one step back traceability be conducted with full mass balance of a raw material selected by TRG. Furthermore, it is required that within 48hrs a full traceability back to origin be conducted. The assessments will not be scored but recommendations for improvements will be made.

3.2 First production runs of bespoke lines

TRG reserve the right to attend first productions of products to ensure safety and quality of product. 1st production visits will sign off the product specification for future productions. Once signed off any changes to the specification must be approved by TRG Technical.

3.3 Complaints

TRG operate a complaints management system.

Charges will be levied for any justified complaints; these charges include administration fees and replacement product costs. Further details re the process can be found in your supplier contract.

3.4 Testing and Surveillance

As part of our Quality Assurance Procedures, TRG will conduct surveillance testing of products in accordance with a risk assessment. Products sampled for analysis will be charged to suppliers. TRG will provide details of any non-conformance identified as part of surveillance testing, suppliers will be requested to comment on results and initiate full investigations where appropriate.

All testing will be conducted at laboratories accredited to ISO17025.

3.5 Supplier Technical Assessments

Key product lines will be routinely reviewed vs specification and feedback provided to supplier; suppliers will be invited to attend sessions. Any non-conformance or areas for improvement identified during the sessions will be reported to the supplier for action.

A supplier scorecard will be distributed to suppliers on a quarterly basis, the aim of the scorecard is to capture technical information on a frequent basis and use to assist suppliers with development. Suppliers are required to return the information in a timely manner.

3.6 Microbiological Testing

All suppliers are required to complete routine microbiological testing of TRG products, the frequency of which to be determined by risk assessment and approved by TRG Technical. Appendix 1 outlines our criteria.

4.0 Food Policy

The below sets out the requirements for all food items supplied to TRG.

4.1 Legislation

All products supplied to The Restaurant Group must comply with retained EU and UK Legislation.

4.2 Vegetarian

Products suitable for ovo-lacto vegetarians (i.e., those vegetarians eating eggs and milk) must not contain any animal flesh or ingredient derived from the slaughter of animals. Additives not permitted in vegetarian products include cochineal (E120) derived from insects and the processing aid, isinglass, derived from fish. Products labelled as suitable for vegetarians should be subject to a detailed risk assessment and if meat handled in the same production area routinely tested for the presence of animal protein.

4.3 Vegan

Products suitable for vegans must not contain any animal flesh or ingredients derived from the slaughter of animals, dairy products or egg, products from insects or bees, e.g., honey, beeswax or substances derived from hair, e.g., keratin, L-cysteine.

4.4 Food Additives

All additives must comply with the relevant UK and retained EU Legislation. We are committed to continuously reviewing and improving our ingredients to minimise the level of additives as much as practically achievable. Where use of additives is unavoidable, we only permit FSA approved additives, compliant with all relevant Legislation and Food Safety guidelines.

4.5 Artificial Colours

The following artificial colours are not permitted in products supplied to TRG for use in food including children's items:

- E102 Tartrazine
- E104 Quinoline Yellow
- E110 Sunset Yellow FCF
- E122 Carmoisine
- E124 Ponceau 4R
- E129 Allura Red
- E120 Carmine

In the event their use should be considered essential in the production of any product produced for TRG, the supplier is required to obtain written approval for the supply of the product from the Group Technical Manager.

4.6 Irradiated Foods and Ingredients

Irradiated foods and ingredients are not permitted for supply to TRG.

4.7 Genetically Modified Foods

GM ingredients are not permitted for supply to TRG.

Animal feed for protein lines is exempt as not classified as a food ingredient.

4.8 Nano technology

Ingredients using Nano technology are not permitted for supply to TRG without approval from TRG Technical, any approved items must meet 'Novel Foods Regulation' (Regulation (EC) No 258/97)

4.9 Hydrogenated Vegetable Oils

Hydrogenated vegetable oils (HVOs) are not permitted for use in any products supplied to TRG.

4.10 Trans Fatty Acids

Added Trans Fatty Acids are not permitted as an ingredient in any product supplied to TRG.

4.11 Palm Oil

TRG are committed to removing unsustainable ingredients and raw materials from our products. All suppliers must ensure that all the Palm Oil used in our products is produced in an environmentally, economically and socially sustainable way. We use Roundtable on Sustainable Palm Oil (RSPO) certification for palm oil used in our products.

4.12 Soya

TRG are committed to removing unsustainable ingredients and raw materials from our products. All soy should be sustainably sourced and where applicable certified to a recognised standard. All suppliers must ensure that all the soya used as animal feed in the supply chain is certified sustainable according to a recognised certification scheme, such as RTRS.

4.13 Unpasteurised Cheeses

TRG do not permit the use of unpasteurised cheeses within our business with the exception of Parmesan and Grana Padano.

4.14 Egg

TRG are committed to sourcing products only containing cage-free or free-range eggs by 2023, any new products submitted should not use caged hen eggs as an ingredient.