**Audit Report** **Global Standard Food Safety Issue 9**

| 1. Audit Summary | | | |
|---|---|---|---|
| Company name | Vion Boxtel B.V. | Site code | 1768974 |
| Site name | Vion Boxtel B.V. | | |
| Scope of audit | The slaughtering of pigs, the deboning, cutting to specification, slicing, packing in bulk, bag in box, consumer packaging of pork meat (fresh, vacuum packed, modified atmosphere, chilled). Production and packing in bulk of mechanically separated meat. | | |
| Exclusions from scope | None | | |
| Justification for exclusion | non-applicable | | |
| Audit start date | 2026-07-14 | Audit finish date | 2026-07-17 |
| Re-audit due date | 2027-11-13 | Head office | Yes |

| Additional modules included | | | |
|---|---|---|---|
| Modules | Result | Scope | Exclusions from Scope |
| Choose a module | Choose an item | | |
| Choose a module | Choose an item | | |

| 2. Audit Results | | | | | |
|---|---|---|---|---|---|
| Audit result | Certificated | Audit grade | A+ | Audit programme | Unannounced - Voluntary |
| Previous audit grade | A+ | | Previous audit date | 2025-08-12 | |
| Certificate issue date | 2026-08-18 | | Certificate expiry date | 2027-12-25 | |
| Number of non-conformities | | | Fundamental | 0 | |
| | | | Critical | 0 | |

## 2. Audit Results

| | | |
|---|---|---|
| | Major | 0 |
| | Minor | 8 |

## 3. Company Details

| | | | |
|---|---|---|---|
| Site address | Boseind 10<br>5281 RM Boxtel | | |
| Country | The Netherlands | Site telephone number | +31 (0) 658196411 |
| Commercial representative name | | Email | |
| Technical representative name | | Email | |

## 4. Company Profile

| | | | | | |
|---|---|---|---|---|---|
| Plant size (metres square) | 10-25K sq.m | No. of employees | >1500 | No. of HACCP plans | 1-3 |

| | | |
|---|---|---|
| Shift pattern | 2 shifts Monday/Friday, five days a week | |
| Seasonal site | No | |
| Seasonal opening times (Start/end date) | Click or tap to enter a date. | Click or tap to enter a date. |
| Other certificates held | ISO 9001, IFS PIA, BLK, IKB, QS, SQMS, approved | |
| Outsourced processes | No | |
| Outsourced process description | | |
| Regions exported to | Europe<br>Asia<br>North America | |

## 4. Company Profile

| | |
|---|---|
| | Oceania<br>Africa<br>Choose a region |
| Company registration number | NL61 EG |
| Major changes since last BRCGS audit | No major changes |

## Company Description

Vion Boxtel B.V. is part of Vion Food Group and privately owned.

The production capacity is slaughtering to 95.000 pigs per week and a production of 98 tons of products. All pigs are bred by Dutch farmers and majority reared conform the Good Farming principles (IKB); a part of them is also reared regarding special Welfare demands (Good farming *).

The plant is equipped with two slaughter lines with a maximum capacity of pigs/day that operates in two shifts. The chilling of the carcasses is realized through spray tunnel (1,5 hour), mild chiller 2,2°C and cooling cell 3°C within 17 hours to a temperature of below 7°C. Organs are chilled in tunnels within 3 hours to a temperature below 3°C. Around 15.000 carcasses are processed daily in cutting (line speed 1100 p/h), deboning (11 lines) and middles (8 lines) departments. Conveyor lines for KJ crates with chip are used for the majority of Internal logistics of products from middles/deboning/cutting departments to areas with packaging machines. The packaging equipment is modern with the ability for metal detection of the product packaged in primary or secondary packaging.

The factory building is well maintained (old and “new” part 2020) with a covered area m2 on two floors. Second floor (changing rooms, canteen, packaging materials warehouse, carcass room, crate wash area). In 2022 the reception area for pigs was renewed.

There’s a 2-shift pattern in most departments. The total number of employees is ( fixed and temporary employees). Most of them are temporary workers (hired via contracted agencies) from East European countries such as Poland, Romania and Bulgaria. There are interpreters and job coaches in the company for communication purposes.

Main customers are industrial meat processing companies in Europe, Asia, USA and Australia. Snit hams are particularly produced for Spain and Italy. Vion Boxtel is approved by authorities for export of pork meat to several third countries (e.g. Japan, Korea, Russia, Canada, Africa, China, Australia).

Produced products are chilled: carcasses, main parts (fore-end, middle, ham), refined parts, trimmings, organs and mechanically separated meat. Packed in bulk (dolavs, crates on pallet), bag in box, vacuum packed and flow packed in cardboard box, modified atmosphere (dolavs).

Centrally managed processes are: a) establishing strategy and mission; b) developing and maintenance of procedures for the main processes; c) create, review and update product specifications, customer specifications and packaging label specification; d) sales and customer contact; e) management of suppliers and approval (farms, non-food goods, services); f) generic HACCP assessment, Food Defense

## 4. Company Profile

and Food Fraud assessments. The HQ processes are not audited separately for BRC and integrated in the audit of the site ) Managing System.

The audit was performed unannounced on site. The company has chosen for voluntary fully unannounced audits for the coming years. The audit started in 30 min after reaching the site.

## 5. Product Characteristics

| | |
|---|---|
| Product categories | 01 - Raw red meat<br>Category<br>Category<br>Category<br>Category<br>Category<br>Category |
| Finished product safety rationale | Chilled red meat (up to 7°C) / up to 2°C), short shelf life 5-8 days and chilled red meat vacuum / MAP packed, short shelf life 14-21 days, DMM <2 days. Intended use: further preservative treatment before it is fit for human consumption. |

| | | | | | |
|---|---|---|---|---|---|
| High care | No | High risk | No | Ambient high care | No |

| | |
|---|---|
| Justification for area | Slaughtering, evisceration, cooling, cutting, packaging areas of raw meat is low risk, products are not ready to eat, intended use: further preservative treatment before it is fit for human consumption. These hygiene zones are in place: 1. highly contaminated areas, where only one way of movement is possible from clean to dirty area; and 2. low risk zone – white/clean area where the processed meat is handled. It is ensured, that the air and water from contaminated zones do not stream to the clean areas. |
| Allergens handled on site | None<br>Choose an allergen<br>Choose an allergen<br>Choose an allergen<br>Choose an allergen<br>Choose an allergen<br>Choose an allergen<br>Choose an allergen |
| Product claims made e.g. IP, organic | GF=IKB; GB= Welfare Approved |
| Product recalls in last 12 months | No |

| 5. Product Characteristics | |
|---|---|
| Products in production at the time of the audit | Pork from carcasses and cut to the technical and customer specification (main parts: fore-end, middle, ham; refined parts; trimmings (70/30 and 80/20, spareribs), organs mechanically separated meat. Packed in bulk, bag in box, vacuum packed, foil packed (wrapped) in carton boxes, modified atmosphere bulk packed. |

| 6. Audit Duration Details | | | |
|---|---|---|---|
| Total audit duration | 32 man hours | Duration of production facility inspection | 16 man hours |
| Reasons for deviation from typical or expected audit duration | None | | |
| Combined audits | None | | |
| Next audit type selected | Unannounced - Voluntary | | |

**Present at audit**

Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings (ref: clause 1.1.11)

| Name | Job title | Opening meeting | Site inspection | Procedure review | Closing meeting |
|---|---|---|---|---|---|
| | Plant manager | X | | X | |
| | Plant manager | | | | X |
| | QA manager | X | X | X | X |
| | Production manager middles processing | | X | X | |
| | Maintenance | | | X | |
| | Maintenance | | | X | X |
| | Employee quality assurance | X | X | X | |
| | Production manager packing area | | X | X | X |
| | Employee quality assurance | X | X | X | |

| | | | | | |
|---|---|---|---|---|---|
| | Manager cutting area | | X | X | |
| | Manager slaughter | | | | X |
| Diverse | Team leaders / employees | | X | X | |

| GFSI Post Farm Gate Audit History | | | |
|---|---|---|---|
| Date | Scheme/Standard | Announced/Unannounced | Pass/Fail |
| 2022-06-16 | BRCGS Food Safety | Unannounced | Pass |
| 2023-11-16 | BRCGS Food Safety | Announced | Pass |
| 2024-11-05 | BRCGS Food Safety | Announced | Pass |
| 2025-08-12 | BRCGS Food Safety | Unannounced | Pass |
| 2026-07-26 | BRCGS Food Safety | Unannounced (voluntary) | Pass |

| Document control | | | |
|---|---|---|---|
| CB Report number | RQA9832737 / 7189912 | | |
| *Template name* | F908 Food Safety Audit Report Template | | |
| *Standard issue* | 9 | *Template issue date* | 2022-12-16 |
| *Directory allocation* | Food | *Version* | 1.1 |

## Non-Conformity Summary Sheet

| Critical or Major Non-Conformities Against Fundamental Requirements | | | |
|---|---|---|---|
| Clause | Detail | Critical or Major | Re-audit date |
| | | | |

| Critical | | |
|---|---|---|
| Clause | Detail | Re-audit date |
| | | |

| Major | | | | | | |
|---|---|---|---|---|---|---|
| Clause | Detail | Correction | Proposed preventive action plan | Root cause analysis | Date reviewed | Reviewed by |
| | | | | | | |

| Minor | | | | | | |
|---|---|---|---|---|---|---|
| Clause | Detail | Correction | Proposed preventive action plan | Root cause analysis | Date reviewed | Reviewed by |
| 4.11.1 | Broken and dirty “materiaalkratten” in the DGS, Flexvers and spare ribs areas. A dirty spray bottle containing disinfectant at the “opknaptafel” in the parts cold store. | The dirty and damaged crates have been replaced and are being cleaned or destroyed.<br><br>The Spray bottle is cleaned and disinfected directly.<br><br>Evidence seen during site tour.<br><br>Agreed with correction and proposed action plan. Minor is closed. | The "corveeërs" have been instructed. Clean daily and check for defects (otherwise replace)<br><br>Reinstruction, clean the materials immediately during rework and check for defects after use (replace if necessary).<br><br>Responsible: Department managers<br><br>Deadline: 23-07-2026 | The "corveeërs" paid too little attention to the condition of the material crates.<br><br>The fixer-upper had forgotten to clean the spray bottle after use.<br><br>Used method: Investigation, brainstorm | 08-08-2026 | |
| 4.7.2 | Various pallet trucks, machines, the elevating work platform and the motor near the elevated grating | Hand pump trucks coated with zinc will be deployed/ordered; until we have these hand pump trucks at our disposal, the existing rust will be | The department management has been asked to draw the attention of the employees carrying | During the structural inspection, insufficient attention was paid to machines, pallet | 08-08-2026 | |

| | | | | | | |
|---|---|---|---|---|---|---|
| **Minor** | | | | | | |
| | walkway (DMM) have lost their paint and are rusty. | removed and treated. This will be carried out periodically (every 4 weeks).<br><br>The department mechanics have been instructed to treat the machines against rust this weekend (week 30).<br><br>The elevating work platform has already been treated with primer and partially painted; further follow-up will take place in the weekend (week 30).<br><br>The department mechanics have been instructed to treat the motor against rust this weekend (week 30).<br><br>Evidence seen: picture cleaned and painted platform, picture and picture motor<br><br>Agreed with correction and proposed action plan. Minor is closed. | out the structural technical inspection to the fact that, during the monthly structural inspection, pay closer attention to defects and rust. Also for the machines, engines, pallet trucks, and aerial work platforms in the department<br><br>Responsible: Department managers<br><br>Deadline: week 31 2026<br><br>Evidence seen: email to department managers 24-07-2026 | trucks, and aerial work platforms located in the departments that show rust / peeling paint.<br><br>Used method: Brainstorm | | |

| Minor | | | | | | |
|---|---|---|---|---|---|---|
| 4.9.3.3 | Torn and damaged forearm protectors in the ham section. | The torn and damaged arm protection were directly removed.<br><br>Evidence seen during site tour.<br><br>Agreed with correction and proposed action plan. Minor is closed. | Before production begins, the covers are checked for defects. If they are broken, they are removed and replaced, and recorded on F-BXT-NL-10193.<br><br>Responsible: Department manager deboning<br><br>Deadline: week 31 2026<br><br>Evidence seen: F-BXT-NL-10193 “Controle losse materialen / onderdelen & eigen schoonmaak” | No daily checks on the condition of the arm protectors had been arranged yet. The department had forgotten to include these materials in the sample list, which they can complete themselves.<br><br>Used method: Brainstorm | 08-08-2026 | |
| 4.4.8 | External door 121 (Flexvers) has a gap at the bottom right. | The door frame is planned to be filled up to the bottom, this weekend<br><br>Evidence seen: picture fixed door | During the monthly structural inspection, pay closer attention to<br><br>Responsible: Department manager inpak | This door only gapes at the bottom in warm weather; this had not been noticed. | 08-08-2026 | |

| Minor | | | | | | |
|---|---|---|---|---|---|---|
| | | Agreed with correction and proposed action plan. Minor is closed. | Deadline: week 31 2026 | Used method: Investigation / brainstrom | | |
| 6.1.1 | During observation of the “steken” process, it was noted that for several carcasses, blood flowed directly into the blood designated for human consumption, without the initial blood being diverted to the cat. 3. Following this observation, this blood was directed straight to cat. 3. | The blood in the collection tray has been downgraded to Cat. 3 material.<br><br>Evidence seen during site tour.<br><br>Agreed with correction and proposed action plan. Minor is closed. | The staff who stab the pigs have been instructed on this. This is checked during the WSOP and CCTV.<br><br>Responsible: Manager Slaughter<br><br>Deadline: 21-07-2026<br><br>Evidence seen: sign off form F-BXT-NL-10069 “Registratie instructie” 21-07-2026 subjects: cleaning and disinfecting knives and run the first blood to cat. 3. | The employee in question was not paying close attention and stabbed the pig too late.<br><br>Used method: Investigation / brainstorm | 08-08-2026 | |
| 6.1.3 | After cutting each carcass, the knife is rinsed and sterilised in the hot-water steriliser, however, only the tip of the knife is sterilised, and for less than 1 second. | It was immediately explained to the employee that he must completely sterilize his knife, even though he rinses the knife clean first.<br><br>Evidence seen during site tour. | The employees who stab the pigs have been instructed on this. This is checked during the WSOP and CCTV. | The employee in question assumed that this was sufficient. During the sample checks at the WSOP and CCTV, it was not noticed that | 08-08-2026 | |

| Minor | | | | | | |
|---|---|---|---|---|---|---|
| | | Agreed with correction and proposed action plan. Minor is closed. | Responsible: Manager Slaughter<br><br>Deadline: : 21-07-2026<br><br>Evidence seen: sign off form F-BXT-NL-10069 “Registratie instructie” 21-07-2026 subjects: cleaning and disinfecting knives and run the first blood to cat. 3. | disinfection was insufficient.<br><br>Used method: Investigation / brainstorm | | |
| 4.4.3 | Dirty water from the shoe brush at the entrance to the $CO_2$ stunner runs across the floor behind the brush, so that people walk through the dirty water before entering the production area. | The drain pipe has been assembled and installed after the installation.<br><br>Evidence seen: picture of the assembled drain pipe<br><br>Agreed with correction and proposed action plan. Minor is closed. | The technician was instructed to also check beforehand whether the connections fit.<br><br>Responsible: Manager Maintenance<br><br>Deadline: 16-07-2026 | The mechanic had not noticed that the drain pipe had a different size.<br><br>Used method: Investigation / brainstorm | 08-08-2026 | |
| 4.6.3 | F-BXT-NL-10120 “Risk assessment of new machinery, workspace and process” cannot be demonstrated for the new spare ribs production line. It can be demonstrated for the | The complete risk analysis has been provided by the department to all parties involved. | It has been agreed that our safety expert will maintain and follow up on all risk analyses until they are fully completed. | The risk analysis of the spareribs was indeed carried out. It was circulated to the parties involved on 03-03-2025. | 08-08-2026 | |

| Minor | | | | | | |
|---|---|---|---|---|---|---|
| | cobot and stomach packing line, but as both are still pilot set-ups, the forms will only be signed off once the full MoC process has been completed. | Evidence seen: F-BXT-NL-10120 “Risk assessment of new machinery, workspace and process” Spareribs, signed off by all applicable managers.<br><br>Agreed with correction and proposed action plan. Minor is closed. | Responsible: Safety expert<br><br>Deadline: 27-07-26 | There were still a few follow-up points outstanding.<br><br>These were subsequently handled and finalized, however the definitive version was not provided further.<br><br>Used method: Investigation | | |

| Comments on non-conformities |
|---|
| Click or tap here to enter text. |

## Additional Modules / Head Office Non-Conformity Summary Sheet

| Critical | | |
|---|---|---|
| Clause | Detail | Re-audit date |

| Critical | | |
|---|---|---|
| | | |

| Major | | | | | | |
|---|---|---|---|---|---|---|
| Clause | Detail | Correction | Proposed preventive action plan | Root cause analysis | Date reviewed | Reviewed by |
| | | | | | | |

| Minor | | | | | | |
|---|---|---|---|---|---|---|
| Clause | Detail | Correction | Proposed preventive action plan | Root cause analysis | Date reviewed | Reviewed by |
| | | | | | | |

## Audit team

| Lead auditor | | |
|---|---|---|
| **Auditor number** | **First name** | **Second name** |
| | | |

| Audit team | | | | Attendance (YYYY/MM/DD, 24hr: MM) | | | Presence | |
|---|---|---|---|---|---|---|---|---|
| First name | Second name | Auditor number | Role | Audit Date | Start time | End time | Remote or physical | Professional recognition number |
| | | | Lead Auditor | 2026-07-14 | 07.00 | 14.00 | Physical | |
| | | | Lead Auditor | 2026-07-15 | 07.00 | 15.45 | Physical | |
| | | | Lead Auditor | 2026-07-16 | 07.00 | 15.30 | Physical | |
| | | | Lead Auditor | 2026-07-17 | 07.00 | 15.30 | Physical | |

## 1. Senior management commitment

**Policy**
The site policy is documented in: **P-BXT-NL-10126 v22 signed by TK**
It is signed by the person with overall responsibility for the site.
Commitment to continuously improve the site's food safety and quality culture is included.
Communication to staff: Displayed in key areas on notice boards and part of induction program new employees.

**Product safety and quality culture plan**
The level of culture at the site is identified by: introducing and implementing a plan for the development and continuing improvement of a food safety & quality culture. Culture aspects are clearly communicated through various channels (policy, induction program, annual newsletter).
The culture improvement plan is documented by HQ of Vion in: P-Food-NL-10017, seen updated plan with roadmap/goals to achieve in F-NL-Food-10085.

The procedure includes an action plan for the site, indicating and measuring how and which activities will be undertaken within a defined timeframe (SMART).

During the audit the implementation of this plan was also verified on the factory floor and all other departments that were audited. Seen was, that employees are stimulated in their behaviour by team leaders and buddies. Clear individual and group values, attitudes competencies and patterns of behaviour were visible also during the Huddle meeting on the floor (several times per shift) and Tier 1 meeting (daily with all team leaders, managers e.g., implemented whistle blowing system, training, implementation of 5S system, production start-up meetings like VOS and Tier) which are included in the quarterly reviews.

Last review of the food safety management system was performed by a quarterly quality review as input for the MR: scores per elements were included in the MR over FY 2024-2025 (July 2024-June 2025). These elements are 1. Annual quality plan 2. changes 3. Quality and NVWA 4. Audits 5. NVWA 6. Customers 7. Suppliers 8. Integrity, food fraud and food defence 9. EKS 10. Animal welfare 11. Micro / FS / CCPs

Date of last review of plan: **12/08/2025**
Frequency of reviews: quarterly
Senior management were able to discuss the plan during this audit (spoken to Operational Manager).

**Food safety and legality objectives**
Notable food safety and quality objectives include:

- Product quality (like cutting, performance mass balance, etc.)
- Results of audits (internal audits, external audits, NVWA inspections
- Complaints specified (FS <0,02 per 1000 kg finished product, Integrity <0,02 per 1000 kg)
- Food safety culture objects (see above, monitoring of the 7 elements)

Objectives are monitored 4x by MT

Beside the quarterly review, the goals (KPI's) are also part of the Tier meetings, so actually they are monitored on daily basis.
Key results or significant trends: the site is meeting established objectives / effectively progressing through its objectives.

**Management review**

Frequency of management review meetings: 4x. All required items are discussed min 4x / year (quarter review). Who typically attends the meeting: Present during the management review meeting are two site managers, production manager, maintenance manager, QA manager, planning department, finance manager, HR manager.

Date of last management review meeting: **12/08/2025**
How minutes and actions are communicated to staff and recorded:
The company is working with the VOS (VION Operating System) systematic of communication, measuring results and management of improvement. VOS (Vion Operating System) is based at the lean management principles.

**Regular meetings**
The communication levels are described in P-BXT-NL-10028 and is based at a cascading model, based at 2-4x/day team huddles, daily tier 1 meeting and weekly tier 1,5 meetings. Objectives are documented in the X-matrix and are demonstrably linked to the vision and mission of the Vion group. There are non-negotiable objectives set for 2026: e.g. training (improve intake, yearly refresh training, HACCP training for leaders and managers, digital SSOP and PRE-SSOP, data integrity. Other objectives are related to the food safety culture (training) and product flow management at shop floor / digital checklists. Also training goals were set on training executives (management on the floor) on Integrity, FS culture, IFS PIA and how to involve employees in this. Progress of the objectives is reported at a 4-weekly base during the tier 2 meeting.
Minute meetings reviewed: **12/08/2025** and **21/04/2026**
Huddles on the floor reviewed, communication seen on daily basis documented on the publication board on every department and in the Tier meeting room.

**Previous nonconformities**
All non-conformities have been closed out suitably (also of last audit), root causes for previous non-conformities were identified and preventive actions were implemented. RCA based on discussions within the QA team incl. involved employees / management but depending on the risk and impact of a deviation / non-conformance. Where necessary an improvement plan was be written. Seen overall action plan (Excel) which is updated after every meeting.

**Organisational structure, responsibilities, and management authority**
The site organization structure is documented in: P-BXT-NL-10028.

Management structure:
The senior management has appointed qualified employees for key functions. Responsibilities and competences are laid down in job descriptions. Employees in key functions and the members of the Incident Management Team are announced in the production site. Also, Members of the Food Safety Team are announced. The organizational structure (P-BXT-NL-10028 is up to date) reflects the current structure and reporting is up to date. The responsibilities for the management of activities are defined which ensure food safety, integrity, legality and quality and are clearly allocated and understood by the managers responsible, which was verified during the audit. Clearly documented were who deputies in the absence of the responsible persons. Job descriptions are reviewed, which were in line with the responsibilities. Performance is reviewed by day-to-day management and yearly during the planned reviews.

Relevant documents of FSMS are available via the network within the organization and embedded in the quality and food safety objectives. Site managers and QA managers are highly involved driving food safety and quality culture improvement based on VOS system. Performance management (white boards / TVs) and daily performance meetings are implemented (Tier meetings). In the chart all levels are defined for the departments. Site management team includes QA manager. The QA department responsible for food safety, legality and quality items is reporting within the management team meetings. Clear responsibilities / competences have been documented in the FSMS including arrangements in case of absence of the

responsible staff. All staff are aware of their responsibilities and have access to relevant procedures. The site uses the knowledge and expertise of the Head Quarter Vion QA department with specialist supporting them. Internal audits are performed by QA key employees from other Vion sites (intercompany).
Overall responsibility for the day-to-day management of the food safety system is with the two plant managers

Several routine meetings are held in which food safety, authenticity, legality, and quality issues are discussed. Senior management is present during most meetings. Meetings are sufficiently provided with action lists with timescales, responsibilities and recording of status. Verified last HACCP (4 times per year) meetings on 06-01-2026 and 21-04-2026. Last senior leadership management (Tier 1,5 1x / week).

**Reporting food safety issues**
How food safety risks, concerns or non-conforming issues are reported by staff and resolved:
Feedback from personnel on factory floor demonstrates that staff is aware when, how, and to who report food safety issues to. The company keeps up to date with emerging issues, legislation, and good practice through branch organization and consultant.

A whistle blowing system is in place, where employees may call and external confidential advisor. The plant manager is responsible for monitoring and cascading this to the relevant stakeholders across the site. Whistle blowing knowledge is yearly examined among several random employees.

**The following supporting evidence was reviewed:**
- See above
- P-BXT-NL-10028 “Overlegstructuur” v49
- P-BXT-NL-10247 “Vervangingsmatrix” v10
- Tier boards with up to date minutes / actions defined
- MR 2024-2025 12-08-2025
- HACCP team minutes 06-01-2026 and 21-04-2026
- Group QA minutes 19-05-2026
- Action list 2026 YTD (PDCA)
- Whistle blowing research among employees 10-04-2026

| Details of non-applicable clauses with justification | |
|---|---|
| Clause/Section Ref | Justification |
| | |
| | |

## 2. The Food Safety Plan – HACCP

There is one HACCP manual described as the: **P-VION-10000 v20 15-09-2025**

Additional assessments are performed for food defence **P-NL-FOOD-10051 v22-11-2023** and food fraud **P-NL-FOOD-10049 v23-06-2026**.

The local process control plan is documented as P-BXT-NL-10116. The site has 8 CCPs and 40 control points (CP's).

The company's food safety control system is based on the Codex Alimentarius HACCP principles: an assessment is made of microbiological, chemical (including radiological risks, allergens) and physical risks for all steps in the production process, packaging material and general elements.
The generic HACCP analyses of Vion are documented as P-FOOD-10000. The HACCP analysis is carried out by the group QA department of the Vion Group and the results are locally translated to the process control plan for the plant Vion Boxtel B.V. In this way the site is informed and updated with legal, product & technology information

**HACCP Team**
The food safety team (local team) is detailed in: P-BXT-NL-10183.
The team leader is well qualified and experienced. The team is multidisciplinary, experienced, and knowledgeable in their fields with required level of food safety training. The HACCP Team is led by the 'Chair' Technical Manager who has more than 20 years' experience in the food industry and trained in Level 3 HACCP. The other members all had appropriate training and experience. Training records were sampled. HACCP team members are demonstrably trained and have good knowledge of the FSMS. Team leader is QA Manager. The company has introduced a special HACCP training for shift leaders/manager of shifts and departments.

**Scope of HACCP**
The HACCP system scope is documented in: **P-VION-10000 v20 15-09-2025**. It covers relevant processes and all products on site. Scope also defined in Export canalisation procedure EKS P-BXT-NL-20217.
Vulnerable groups have been identified. Product is suitable for regular consumer groups.
Product descriptions are detailed in: **P-BXT-NL-10170 v13**. Relevant information is described and information on food safety is included. The scope accurately reflects all products on site.

Product is suitable for regular consumer groups. Different product groups are applicable (also in P-BXT-NL-10170) and relevant information is described (product description/range, general food safety risks, packaging types, composition, ingredient groups, microbiological, chemical, radiological and physical properties that impact food safety, maximum safe shelf life under prescribed storage and usage conditions and also information on Food safety is included: the product groups: Food / Fresh pork meat (Dutch origin).
The intended use of the product by the customer has been clearly defined. The intended use does not exclude any consumers, further preservative treatment before it is fit for human consumption.

**Process flow diagram**
Record key process steps/operations to manufacture products within the scope of certification: flowcharts P-BXT-NL-10026 v35.

Record date and reason of last verification: **22/01/2026**
Flow-diagrams are maintained and signed as verified by members of the HACCP team; all were reviewed during the HACCP review.

Key process steps / operations to manufacture products within the scope of certification were verified for all processes during the audit and steps were shown. The several stages can be recognised: e.g. purchase / receipt of pigs, control /check at the stable, slaughtering, chilling, deboning, positioning, packing, processing and storage and dispatch.

**Hazard analysis**

The HQ Vion organisation has made a general HACCP assessment, for raw material and all process steps and has identified all PRP's, CP's and possible CCP's. In the local HACCP assessment, this is in P-BXT-NL-100116. The hazards and associated risks against the steps and raw materials including packing materials. In the system of risk assessment, a decision tree is taken in the document incl. method of risk analyses and list of literature (included in the general assessment P-FOOD-10000). It is clearly described how to choose to come to PRP, CP or CCP.

Clear instructions on control procedures, critical limits and corrective measurements are present. The quarterly HACCP review by the HACCP team is spoken with all managers and team leaders, in general good control was seen.
Changes in HACCP plans are also a point of attention when including new machinery.
The prerequisite programme is part of the QMS system and is based at EG 853 and EG 854 requirements. Verification by the daily pre-SSOP and SSOP checks, corrective actions are addressed directly, and corrections are demonstrably recorded and verified (all documented in a digital system). CCP records are verified as part of the vertical traceability test, and during the audit on site, no deviations found.

HARA is based on comprehensive information sources**.**
**P-BXT-NL-10116 "Procesbeheersplan" v40.**
Severity vs likelihood is considered.
Outline hazards considered specific to each process step:

- foreign bodies, pesticides, chemical risks (including lubricants, cleaning and disinfectants and bacteriological risks, radiological, amongs others.

**CCPs, limits and controls**
Provide CCPs / PRPs details:

| CCP number | CCP | Control measure | Critical limit | Monitoring frequency |
|---|---|---|---|---|
| 1 | Faecal contamination of carcasses | Visible detection faecal contamination | zero tolerance for visible faecal contamination just before the carcass cooling step | 25 carcasses at least 4 times per day. |
| 2 | product temperatures at dispatch for organs | Thermometer | <=3°C, vacuum <=2°C | Every load of 5 measurements |
| 3 | product temperatures at dispatch for fresh meat | Thermometer | <= 7ºC vacuum <=6 ºC Separator meat <= 2°C Client specific temperatures of fresh meat , 7°C. | Every load of 5 measurements |
| 4 and 5 | product temperatures at dispatch for fresh meat, partly chilled (6 and 30 hours) | Thermometer | <= 7ºC surface temperature and I case of 30h also core temperature max. 15°C | Every load of 5 measurements |
| 6 | Incoming meat delivered by external companies | Thermometer | <=7°C | Every load of 5 measurements |
| 7 | Incoming/returned organs | Thermometer | <=3°C | Every load of 5 measurements |
| 8 | Incoming/returned meat | Thermometer | <=7°C | Every load of 5 measurements |

A CCP / CP overview has been defined: **P-BXT-NL-10118 "Overzicht CCPs en CPs" v15 .**

**PRPs** have been identified in: **40 in total**. Control measures have been defined. This includes e.g.:
- Cleaning and disinfection
- Pest management
- Maintenance and equipment
- Personnel and hygiene
- Training
- Supplier approval and purchasing (customer requirements)
- Transportation
- Cross-contamination as defilement of meat (including manure contamination risks) / fallen meat
- Water and air
- Cold chain
- Waste
- Traceability
- Integrity
- Product information

Examples of corrective actions:
Actions when monitoring levels exceed acceptable limits are documented within the HACCP plan, recorded and investigated. Based on live demonstrations and records checked during this audit, all CCPs are in control conform the work instructions.

**Validation, verification and review:**
The company has effectively validated and verified the HACCP / Food Safety Plan, including the critical limits, control measures and PRPs specific for controlling food safety hazards. Procedures for verification have been established. Last HACCP review on 12-08-2025.

Procedures include performing internal audits, review of records where acceptable limits have been exceeded, review of complaints (by enforcement authorities or customers), review of incidents (of product withdrawal or recall). Validations of the new **legs cutter, stomach packing line and Cobot** are observed. Documentation and record keeping is verified.
Results of verification/validation are recorded and communicated to the HACCP food safety team. Validation was sampled for the CCPs.

**The following supporting evidence was reviewed:**
- P-BXT-NL-10028 HACCP team
- On-site demonstration CCPs
- P-BXT-NL-10118 "Overzicht CCPs en CPs" v15
- P-BXT-NL-10116 "Procesbeheersplan" v40
- Process flowcharts P-BXT-NL-10026
- HACCP team minutes 06-01-2026 and 21-04-2026

| Details of non-applicable clauses with justification | |
|---|---|
| Clause/Section Ref | Justification |
| | |

## 3. Food safety and quality management system

### 3.1 Food safety and quality manual, 3.2 Document control, 3.3 Record completion and maintenance

**Food safety and quality manual**
The Food Safety & Quality Manual **P-NL-FOOD-10028** with department specific work instructions are available on the network ( ) and at point of use as demonstrated throughout the audit. All procedures and work instructions are in Dutch and English. All staff are expected to have appropriate levels of one of these language skills and otherwise there are translaters on site. Documentation seen is up to date. Only QA can make the changes into the system. Changes are indicated in the procedures in a yellow color.

All documents seen during the audit were complying.

**Record completion and maintenance.**
Records are in good condition and retrievable electronically or on site. Printed versions are the responsibility of the department managers. Records retained varies by document and are specified in **P-BXT-NL-10234 "Databeheer" v4.**

**The following evidence was reviewed:**

- Digital and records on paper

### 3.4 Internal audits

The following document(s) define the process: **P-VION-10011**
The audits generally follow ISO9001, BRCGS, integrity and animal welfare guidelines and clause structures.

Internal audits are conducted: quarterly. The program includes at least four different audit dates spread throughout the year and is risk-based, considering any previous audit findings.

Internal audits are performed by the QA managers of affiliating sites and group QA managers to maintain independency.

Auditor competency has been demonstrated through training records, sufficient knowledge of the products and processes and experience.

Internal audits are reported in fixed formats with annexes per scheme. BRC is annex 3 to the audit report. Objective evidence of compliance and non-compliance are reported. The audit criteria are clearly referenced. Findings are included in a central log, monitored for follow-up, and evaluated in management meetings. Follow-up actions include immediate correction, root cause analyses and corrective action. Responsibilities and timescales for verification/closure of findings have been defined.

A few minor nonconformities have been raised with no trends identified. Root cause is performed (results of discussions). All actions were closed within the due date. Audits contained a good amount of detail.

A separate program of internal inspections of the factory environment and processing equipment is undertaken daily by pre-SSOP and SSOP control and also factory environment and processing equipment inspections are included in the quarterly glass inspections and monthly maintenance inspections.

Inspections are performed by using a digital checklist which includes a clear action list. Performance is measured based on a scoring system and link to a KPI. Actions in response to deviations are recorded, cascaded to team leaders for follow-up, and discussed in HACCP meetings. Completion of actions is

verified upon the next inspection by responsible person. The effectiveness of the system is discussed in the Management Review.

Inspection report reviewed during this audit: **21/04/2026**. Besides this report, more reports assessed (see below). 6 minor issues had been observed. Follow-up of actions is demonstrable with records.

**The following evidence was reviewed:**

- Procedure P-VION-10011 Internal audits
- Planning 2026 “Hygiene and integrity audits”
- Results of internal audits and inspections in the quartly quality reports ans management review
- Internal audits are reported in: QOL
- Internal audit report by (QA Vion Tilburg) 30-09-2025 and 21-04-2026. Max. 3x in a row same auditor.
- Internal auditor training certificate by on 11-11-2012
- PRE-SSOP stable, slaughter (dirty and clean) 12-05-2026
- PRE-SSOP cutting, veredeling, middles and packing 13-05-2026
- PRE-SSOP dispatch and emballage 15-05-2026
- SSOP slaughter (dirty) 12-05-2026:
  - temperature sterilisers 86,6°C and 83,8°C
  - CO2 91% and 90%
  - Broeitemperature 60,1 / 57,8 / 58,1 (limit 58 - 62°C)
- SSOP slaughter (clean) 12-05-2026, temperature steriliser 85,1°C
- SSOP cutting, veredeling, middles and packing 13-05-2026
- SSOP Flexvers / MMC / DMM / spareribs / batcher 13-05-2026

## 3.5 Supplier and raw material approval and performance monitoring

### 3.5.1 Management of suppliers of raw material and packaging

The company’s raw material risk assessment, including primary packaging, is documented in: **P-FOOD-10032 Supplier assessment non-food and services.** Vion Farming evaluates the supply chain of the alive pigs. All potential risks have been appropriately considered. Significant risks include: **status of the pigs on diseases or physical wellbeing.**

The risk assessment forms the basis for the raw materials acceptance and testing procedure and for the processes adopted for supplier approval and monitoring.

The supplier approval procedure is documented in: **P-FOOD-10032** and responsibility and initiation are with HQ. Procedure is found to be suitable and effective. Scoring of <65 = bad, scoring of <85 is evaluation. Improvement program of the worst 20% of suppliers.

List examples of suppliers reviewed during this audit:

| Name/Initials supplier | Supplier of: | Method of assessment | Evidence seen |
|---|---|---|---|
| Vion Farming | Pigs and sows | VKI status of farms | VKI’s |
| . | Foil | GFSI certificate | BRC packing |
| | Carton | FSC | FSC cert |

All suppliers are evaluated: annually.
Suppliers are rated on quality, service, delivery, and complaints. All suppliers graded satisfactory in the past year.

Suppliers, that are not audited or certificated, have been traceability tested on first approval and then at least every three years: **Yes**

For raw materials purchased from an agent, broker or wholesaler, is the identity of the last manufacturer, packer or consolidator of the material known:

Traceability system is verified through: GFSI certification of the manufacturer.

Handling exceptions and absence of information is considered in the supplier approval procedure. Exceptions can be made on supplier status and when information is not available straight away. But this should be fixed within 3 days otherwise the supplier is taken off the approved supplier list and blacklist.

The following supporting evidence was reviewed:
Supplier evaluation over 2025 23-03-2026. Results of cleaning company, laboratory and cleaning chemical supplier all > 84,4

## 3.5.2 Raw material and packaging acceptance, monitoring and management procedures

Procedures for the acceptance of raw materials and primary packaging on receipt are in place and based on risk assessment (see 3.5.1).

Deliveries are visually checked for product integrity, labelling and cleanliness. Based on risk assessment, food safety hazards are controlled through COAs, internal analysis etc. Samples have been taken (see below).

The requirements to be met for acceptance is identified for all raw materials (including primary packaging). Parameters for acceptance and frequency of testing have been clearly defined, implemented, and reviewed.

**The following evidence was reviewed:**
- Livestock delivery procedure P-BXT-NL-10022
- VKIs of several farmers / UBNs
- Overview review F-Food-10032 25-03-2026 non food and sevices
- There is an internal packaging warehouse. GMP and good controls were seen during site tour and vertical trace test.

## 3.5.3 Management of suppliers of services

The following services are used:
- Pest control
- Maintenance
- Laundry services
- Cleaning
- Transport
- Off-site storage
- Agencies

Approval and monitoring for ongoing performance are described in the company's supplier approval procedure (referenced under 3.5.1). Service suppliers (based on risk assessment) are evaluated annually.

Contracts are in place that clearly defines service expectations. Food safety aspects are appropriately addressed.

| Company | Service |
|---|---|
| | Clothing |
| | Cleaning |
| | Pest management |

Many suppliers of services are long standing with a good history of supply and contained on the approved supplier list from initial approvals.

Management reviews include performance of suppliers of services.

**The following evidence was reviewed:**
- Overview review F-Food-10032 25-03-2026 non food and sevices

## 3.5.4 Management of Outsourced processing

Not applicable – no outsourced processing in place.

## 3.6 Specifications

Specifications include limits for relevant attributes (relevant chemical, microbiological, physical and allergens). Key data is included to meet customer and legal requirements and to assist the user in the safe usage of the product.

During the audit, several specifications were reviewed:
- Finished product: art. 35293 Loin wo/bone/rind/belly
- Cut-class 6352-70 23-09-2026 v6
- Packaging: 14-08-2025
- Cleaning agent:
- Lubricant (chain grease)

All were seen to be clear and accurate.

Formal agreement of customer branded products is verified through the system of the retailers (for instance SIM, Trace one, or GS1). Verified customer approval during the vertical traceability exercise.

Frequency of review of specifications: at least every 3 years or if changes occur.

**The following evidence was reviewed:**
- Application MDM with all finished product specifications
- List of all chemicals avaliable in outside storage

## 3.7 Corrective and preventive actions

Procedures are in place for handling and correcting issues identified in the food safety and quality management system. This is documented in: P-FOOD-10171 and the VOS system.

Several systems on correction and preventive actions in place. For operations the process of corrective and preventive actions is related to VOS for the operational processes.

Corrective actions related to complaints are communicated via the tier 1 structure.

Corrective actions related to pest control, pre SSOP, SSOP are recorded and demonstrable. In case of unfavourable trends an A3 improvement process is starting to investigate the root cause and identify measurements to improve. Used methods for improvement is based at go-look-see approach.

Corrective actions on sampled internal audits were also checked for, good follow up and corrective / preventive actions were demonstrably taken. Some open actions were seen, but no overdue deadlines.

Managing corrective actions, defining root cause and actions for follow up and effectivity check is described / managed by several procedures and methods of follow up.

**The following evidence was reviewed:**

-
- VOS system (results of Tier overviews)
- Internal audits corrective action overviews
- Excel overview complaint handling

## 3.8 Control of non-conforming product

Control of non-conforming product is detailed in: **P-BXT-NL-10031**

There are categories for customer complaints, internal NCs and incidents, non-conforming materials and suppliers used.
Most internal non-conforming products are caused by temperature issues: F-BXT-NL-10064.

(Semi) finished products are checked regularly during the process stages. (the pigs (raw materials) are checked during regular processes.

Clear procedures for control of non-conforming products (e.g. fallen meat, blockades) are in place: Products on hold are physically identified as such (red label/tape). Process is seen in practise during the site audit for fallen meat in the middle cutting area; no deviations seen. The procedure for non-conforming product defines how non-conforming product is identified, quarantined and disposed of.
Non-conforming products are physically labelled with a red form.

Returned goods are managed by P-FOOD-100181. Only authorised personnel (QA officers or department manager) are allowed to release products.
Raw materials and (semi) finished products are checked on a regular base during the process stages. Products are released by production team leaders. Corrective and preventive actions are described in several work instructions. Clear process well understood by staff that was interviewed during the audit.
Manual hold by labelling pallets of recipients with label covering the required information. Release of products on hold by production manager or QA. Segregated sections in the final product warehouses for non-conforming products, returned goods (none seen during the audit). Corrective and preventive actions system is up to date. The handling of non-conforming products is according to requirements. No blocked products seen during audit round.

Corrective and preventive actions are described in several work instructions (see previous section). Clear process which is well understood by staff that was interviewed during the audit.

Responsibilities regarding release of products on hold lies with department responsible.

Records are kept of decisions made and where product is destroyed for food safety reasons.
These are recorded and kept by each department.

Example seen of non-conforming product incident: n/a

**The following evidence was reviewed:**
See above

## 3.9 Traceability

The traceability process is documented in: **P-BXT-NL-10120, packing P-BXT-NL-10125**

**Traceability through the process:**
Traceability system operates through computer system and paperwork enables trace of raw materials and packaging from supplier through processes to packing and dispatch. Incoming pigs are entered into the ERP system and classified. After cutting carcasses is transported from the warehouses to the production facilities and further on. Recording batch information packaging materials, rework batches or pallets to be re-used on the production record sheets (as reviewed for vertical audit).

**Traceability marking on products:**
Traceability system is well developed and mass balance also induced by the IFS PIA requirements on food fraud. It covers raw materials through work in progress to finished product including packaging

materials and distribution according to (P-FOOD-10015). Procedure includes the required documents to complete the traceability and the mass balance. The traceability is according to requirements country of sales e.g. China, USA, tested during the specific annual China / USA audits. This system is fully based on digital applications as (Stable Information System and other applications written documents, batch codes and bar codes. System continuously in development.

- Pigs wear an earmark (+ accompanied by track record and VKI)
- Information earmark is linked to the chip in the slaughter hook and recorded in .
- Half carcasses get an EG-mark + serial number (together with date of slaughter + slaughter line number + origin)
- Technical parts (own production + additional purchase) get a batch code (EG-mark + date of production + origin)
- By-products get a batch code (date of slaughter / production)
- Finished product is traced depending on the date of production + calculation number (weighing label is scanned at dispatch)
- Primary packaging materials and dry ice are traced on the date of receipt / breaking into new batches
- Returned product + NAR (destination form), reworked product.
- Crates in the Cutting departments and in the new section Middles have chips and are given info per line. Readers on several places.

**Traceability test details company:**
Frequency: min. 1x up and 1x downstream per year, however, during most client audits, also a trace tests must be performed, so real frequency is > 10 trace tests per year.
Last test conducted: **27/01/2026**
Product **Pork meat**
Lot code: **seen all details, incl. mass balance**
Results are retained as documented information and reports include all relevant information and data (including mass balance information). Traceability is achieved within 3h.

**Vertical audit details:**
Finished product: **Loin wo/ bone/rind/belly**
Raw materials: **slaughter date 12-05-2026 (checked for UBNs)**
Printed packaging and labels: **order number**
Production/packing date: **13/05/2026**
Quantities reconciled: **2670,5 kg**

Key documentation reviewed including process control and quality control documentation:
slaughtering date and production date all Pre-SSOPs and SSOPs, VKI, quantity records checked, the mass balance of the slaughter day was checked and also of deboning and cutting/portioning steps in digital applications. This, as well as tracing of the (primary) packing material (dolav bag). All was traceable.

**Summary traceability and vertical audit:**
Fast tracing (forwards / backwards) including packaging was possible in the records / system. Rework is not used. No product in stock, all sold. Seen product specifications of all raw materials and finished product, receipt records, food compliance certificate is verified. Fully traceable one-step-up and one-step-down the system, including packaging. Verified records of CCPs and PRPs, delivery control checks, production checks, calibration and analyses were verified too. Time to perform the test was respected (<3h). There were no issues found during the product traceability and all documents showed control over the system for food safety by the organisation. Food contact materials legalization is fully implemented. The company's traceability system is found to be effective.

## 3.10 Complaint-handling

Complaint-handling is documented in: **Procedure P-NL-FOOD-10054, Form F-NL-FOOD-10007.**

Follow-up of complaints is managed through usage of the standard form to be filled out by QA and sent back asap to the head office where the complaints are received and from where (customer) communication takes place.

Complaints are received by the sales organisation and send to the complaint inbox email address of Vion Boxtel. Complaint handling is performed at a daily base within the prescribed timelines. Process is verified for some examples; the complaint handling is demonstrable organised. Organised process with in-depth analyses for food safety complaints and link to the VOS system. There's a weekly complaint analysis report, which is discussed in the tier 1 meetings.

QA keeps an excel file to keep an overview. Complaints are handled centrally using the forms and investigations are completed by the site QA and returned to the central function for responses. Corrective actions are carried out promptly and effectively.

Product complaints:
Total 2026 YTD: **35,2 / wk** complaints
FS 2026 YTD: **55,5 / Q** complaints
Most of the complaints are about weight and product quality.

Top 3 of complaints:
1. Too light
2. Broken bones
3. Blood meat

A trend analysis is maintained and documented and discussed in management meetings (including data was discussed during the quarterly management review).

In 2026 YTD there were 10% less complaints than in 2025.

**The following complaint samples were taken:**

Complaint 03-03-2026 yellow ribbon between meat, 11-03-2026 completed

Complaint 18-03-2026 unusual smell in ham. Dealt with over the phone, no date specified

Complaint 30-03-2026 yellow label between plaatham, 02-04-2026 completed

## 3.11 Management of incidents, product withdrawal and product recall

The company has procedures in place to report and effectively manage incidents and potential emergency situations that impact food safety, authenticity, legality, or quality.

Contingency plans have been considered, including the need to withdraw or recall products.

There is a documented product withdrawal and product recall procedure incl. how to handle in case of serious other incidents: **P-VION-10015**

The recall procedure is tested 1x / year.

There is a Vion overall crisis and recall management procedure managing incidents and potential emergency situations that impact food safety, authenticity, legality or quality issues and is applicable for recalls and withdrawals. Information on informing certification body was included. This procedure covers the process which is applicable in site and is managed by HQ Vion. The procedure for non-conforming product defines incidents and addresses requirements in terms of incident reporting as these are escalated to relevant personnel for review and action as appropriate. Business continuity guaranteed by central procedures and emergency coordination protocol. The local procedure Product recall P-BXT-NL-10024 defines the recall team and complies with these requirements.
LRQA is referenced as contact, indicating that incidents/withdrawal/recalls shall be reported via the website within 3 days of the event.

No withdrawals/recalls occurred since the previous BRCGS audit.

Date of last incident management procedures test: **11/06/2026**
Type of test completed: check phone numbers and availability of recall team members outside normal working hours (at night)

Mass balance information is included in the report. Traceability is achieved within 3 hours. Successful test conducted. From test of 27-01-2026 no improvements have been required as result of the outcome.

**The following evidence was seen:**
- incident list
- Reports of the performed tests (see dates above)

| Details of non-applicable clauses with justification | |
|---|---|
| Clause/Section Ref | Justification |
| 3.5.1.5 | No purchasing of Agents or Brokers |
| 3.5.4 | No Outsourced processing |

## 4. Site standards

### 4.1 External standards

Plant located in an industrial area in a rural environment.

Site boundaries are clearly identified. Premises is fenced off with security gate access to the facility.

Types of buildings include stables and life animal truck cleaning facilities for 8 trucks, production facilities, storage areas, dispatch areas, bone collection, offices, crate washing area, maintenance workshop.

**Site security:**
Unauthorized access is prevented by use of badges access. Visitors/contractors must register at the security building. Several CCTV cameras are installed.

Supervision by maintenance staff. Truck drivers need to register before they can enter. The company is always guiding the visitors while visiting the production areas.

External tanks are in place and locked when not in use. This was checked during the audit outside tour. Access to these tanks is controlled through the site key plan.

Good condition of construction noted. No risks have been identified related to the external environment. The site area is properly maintained.

**The following evidence was reviewed:**
- Site tour
- All gates are closed and access only on audthorisation by porter

## 4.2 Site security and food defence

The individuals or team completing threat assessments and food defence plans have the appropriate knowledge**.** The Team is also the site HACCP team. Awareness training was seen for team members.

There is no legal requirement for specific training.

Food defence risk assessment is documented and based on TACCP: P-BXT-NL-20272 v30-06-2026.

Risk score calculation based on impact and likelihood of occurrence. The threat assessment includes both internal and external threats. The site has established a documented food defence plan covering assess points and controls. Camera's porter 24/7 view and control.

Examples of threats that have been determined **unauthorized visitors.**

Appropriate control measures are developed and implemented: **gate control and visitor registration.**

Access is via key coded doors and combination locks. There is an electric gate that can be used outside of normal operating hours. Security training is included for all staff as part of the HACCP introduction to site.

Raw material storage areas are controlled and internal. No external intake points.

**The following evidence was reviewed:**
Considered in Management Review 12-08-2025: entrance, security, badge system, key procedure, storage areas, clothing, SSOP, chemical storage, water treatment, termination of employment, reporting of suspicious individuals, transport

## 4.3 Layout, product flow and segregation

A lay out map with flow of processes and movement of personnel is present, including zoning. This is documented in **VION Boxtel map v28-01-2025**: risk zones are included and contains the flows in conformity. Production risk zones (based on BRCGS Annex 2).

No high risk or high care production assigned on site. In the low-risk areas, effective procedures are in place to minimise the risk of the contamination

Contractors and visitors, including drivers are informed of the requirements for the areas they are visiting through hygiene rules, placed on walls and to be signed in contract or during visit (visitors and contractors).

Premises allows sufficient working space and capacity to work in a proper way. There were no temporary constructions noticed during this audit.
Also, there was no modernisation work in progress during this audit. There is a site plan for the plant. The routing for the removal of waste products is also demonstrably stated.

The slaughtering, processing and packaging areas of the production are well designed and maintained to prevent risk of contamination. Premises are suitable for the intended purpose. Process flow is designed to minimise/prevent contamination and agreed with the Food and Consumer Product Safety Authority. Personnel-, material-, air-, water, waste-, services flows are designed, and equipment placed in such a manner as to minimise the risk of product contamination.

**The following evidence was reviewed:**
Actual site map v28-01-2025 is seen
Verification performed during on site audit

## 4.4 Building fabric, raw material handling, preparation, processing, packing and storage areas

Building materials were in good condition. Smooth cement floors, walls, and ceilings from metal cladding.

Condition of building was suitable and satisfactory for the process. The cutting and deboning site is a modern building fabric, well maintained. Good facilities.

Elevated walkways and mezzanine floors that are adjacent or above open product are well protected to avoid contamination.

Walls, doors, ceilings and floors were not all suitable in general, but are recorded in . Drainage system and ventilation are according to requirements. Dirty water from the shoe brush at the entrance to the $CO_2$ stunner runs across the floor behind the brush, so that people walk through the dirty water before entering the production area (**see minor NC**).

Well maintained ceilings/constructions with a good access to suspended ceilings, which are full closed. Protected glass, no windows can be opened in the processing areas.

Floors are coated or granite and in good condition. Continuous attention is given to the condition of the floors.

There's a technical area above the production area of the middles and packaging area for technical parts like the ventilation system.

Suitable ventilation and cooling throughout the factory. Daily check of the condition by the SSOP checks and in depth by the monthly inspection of fabrication and hygiene aspects. Permanent swipers available to remove condensation (risk based) from walls, pipework, ceilings, evaporators, etc.

Doors overall in good condition, except external door 121 (Flexvers) has a gap at the bottom right **(see minor NC)**. Doors are kept closed when not in use.

There is a dedicated washing area present. The washing of equipment is done separately from production. Plastic strip curtains present, no deviations seen.

**The following evidence was reviewed:**
All above was verified during the onsite audit.

## 4.5 Utilities – water, ice, air and other gases

Water is used for: **cleaning and hand washing, in the slaughter process used to rinse meat parts, for scalding and for spray cooling carcasses.**

Source(s) of water supply:
- Municipal/city
- In-house treated (Yes. Descaler system installed to prevent equipment damage)
- Water and wastewater management by
- Storage in holding tanks, heated in steam tanks

Only potable water is used.

Microbiological or chemical testing is undertaken: **quarterly** (last test results dated **16-06-2026**) on colour, odour, cloudy, TVC 22°C, e. coli and enterococcus.
Water (incl. ice) testing is completed to ensure the requirements of ' Drinkwaterbesluit' are met. Analysis reports for chemistry and microbiology are completed checks via an accredited external laboratory.

A water system distribution schematic diagram is available in workshop, including soft water and holding tanks for cold water, 60°C and 80°C water.

Sampling points include: ice machine, canteen water, spray cooler.

Gas used in packaging: **Yes**
Compressed air used: **Yes**
Purpose of compressed air use: machine steering
In direct product contact: **No**
Filtered at point of use (when in direct contact): **NA**

Checks are done on filter replacement as part of the preventive maintenance program. But no specific micro filters needed as no food / packing contact is applicable.

Steam is used in the slaughter department to "clean" parts of the carcasses.

N2 is used in MAP packing (bulk packing) chilled pork. CO2 is used for gas stunning.

**The following evidence was reviewed:**
- P-BXT-NL-10016 "Meetprogramma wateronderzoek" v20 03-03-2023
- Lab results spraycooltunnel 04-03-2026
- Lab results drinking water cold 16-06-2026
- Lab results ice 24-03-2026
- food grade approval N2 15-07-2026
- maintenance and filter change compressor 2 16-04-2026, compressor 4 11-06-2026 and compressor 7 04-02-2026

## 4.6 Equipment

Key production and product-handling equipment include: **Equipment installed is typical for usage in the meat industry, most made from stainless steel and food contact surfaces are suitable for intended use. Equipment is good to clean, typically on daily basis with usage of water and cleaning chemicals.**

Line equipment is sourced through: procurement, specified, tested, and commissioned before use.

Equipment which is in direct contact with food is suitable for food contact and meets legal requirements where applicable.

Purchase specifications are in place to ensure new equipment meet legislative requirements and is suitable for food contact where appropriate.

F-BXT-NL-10120 “Risk assessment of new machinery, workspace and process” cannot be demonstrated for the new Ulma spare ribs production line. It can be demonstrated for the cobot and stomach packing line, but as both are still pilot set-ups, the forms will only be signed off once the full MoC process has been completed (**see minor NC**).

Equipment is made of: stainless steel. Belts in contact with food are food grade. Hose used for product transfer is registered as FDA compliant for food contact.

There is a procedure for moving static equipment detailing preventing potential risks to food safety and equipment integrity (MoC).

Equipment that is not in use is always taken into the cleaning schedule.

Mobile equipment and battery-charging equipment is in use, potential risk to the product is prevented by means of separate storage and up to date maintenance.

**The following evidence was reviewed:**
- Site tour
- transport belt specifications: 15-07-2026, 15-07-2026, 15-07-2026
- F-BXT-NL-10120 “Risico-beoordeling nieuwe machines” (at the time of the audit new document F-NLFOOD-10086 v1 31-03-2026)
    - Cobot Flexvers 18-03-2026
    - Stomachs for export to China 22-01-2026, still test setup
    - Legs cutter 14-08-2025, signed off by QA, production manager, preventive manager, maintenance manager, plant manager

## 4.7 Maintenance

**Preventative maintenance**
Maintenance management system: .
Frequency of main checks: daily (startup), weekly, monthly, all depends on the type of maintenance or inspections required per item in (> 3000 equipment indicated, all split up again in specific parts of equipment) managed by engineers on site.
Maintenance people (>40 persons) are trained on hygiene and contamination prevention. Main Maintenance Department is located in a separated building from the production. Per department there are production employees appointed for operator functions and small maintenance and repair activities. Recognisable by black clothes as maintenance employees wear green clothes.

Notable equipment include: all plant, processing and mobile equipment.

Contractor services are used for: several companies like (cooling installations), Backsaver, Eagle.

Samples seen and completed to schedule:
- Oil / water in high pressure air system “veredeling” 29-06-2026 and 05-07-2026
- Maintenance guns 3858 and 4904 on 06-07-2026
- Maintenance stunning batons 2x / year. Last report 04-03-2026.

**Inspection of equipment condition**
Inspections for damage and wear are completed for: daily PRE-SSOP inspections, seen for slaughter and cutting / packing departments.

Various pallet trucks, machines, the elevating work platform and the motor near the elevated grating walkway (DMM) have lost their paint and are rusty **(see minor NC).**

**Temporary maintenance**
Temporary repairs are controlled via: control check via SSOP for each department / area on daily basis performed.

**Handover**
Suitable handover processes were in place after maintenance work to eliminate foreign matter risks generated. Maintenance is performed after regular working activities and before cleaning activities (after working hours by (external company). Maintenance engineers are responsible to take care of their own equipment and removing spare parts/ materials/cleaning up. When maintenance activities must be formed in between, in case of corrective maintenance in between, in such cases, always a handover takes place between engineer and production management (documented on SSOP) who is responsible for cleaning activities. The prod. management manage the cleaning: a special dedicated cleaning team, trained to perform cleaning activities (red clothing) will take care of safe and good cleaning.

**Lubricants**
Range of food grade lubricants used: Most used lubricants are supplied by and all food grade with an FDA H1 status (food grade), verified for lubricant H1 and available to greasers during the weekend. MSDS sheets were seen, and lubricant is food approved and free from allergens. Automatic lubricant system in use for the main process like transport chains.

**Overall cleanliness engineering workshop**
The workshop was well maintained. The workshop is fully segregated from production areas. Entry of the site by regular hygiene sluice. There is a dedicated rest room, changing room and hand wash present.

**The following supporting evidence was seen:**
- system explained by PK
- HACCP training PK on 03-11-2025
- Chain lubricant H1
- system for internal transport
- P-BXT-NL-10104 “Storingsonderhoud”
- P-BXT-NL-10105 “Preventief onderhoud” v3
- P-BXT-NL-10122 “Werkplekbescherming onveilige situaties” v3

## 4.8 Staff facilities

**Changing facilities**
Several designated changing facilities for staff in place that are appropriately sited. Partly sloped lockers observed for storage of outdoor clothing, and a separate area for protective clothing.

Workwear is laundered by external service supplier to a defined process and brought to site in a closed container. Captive site shoes are stored in the work-wear locker when not in use.

**Handwashing**
Hands-free operable handwash facilities located in several areas at entrance to production, equipped with an adequate supply of water delivered at a suitable temperature, soap and drying facilities. Advisory signs

for prompt handwashing are displayed above the sinks. Shoe washing brushes on entrances to cold open product areas.

**Toilets**
Toilets provided do not open directly into production or packing areas. Adequate hand-washing facilities are provided within toilets conform 4.8.5.

**Catering facilities**
Several rest room areas for food storage and eating; catering facility in place. There are also vendors for food and drink. Staff storage for food were seen to be clean and maintained.
No working clothes are allowed in the rest room areas, only trousers are allowed and hairnets are obligated to wear.

## 4.9 Chemical and physical product contamination control: raw material handling, preparation, processing, packing and storage areas

### 4.9.1 Chemical control

An approved list of chemicals is available and documented in: **(lubricants and technical chemicals) and cleaning chemicals provided by** **and** **(facility service).**

Chemical containers including cleaning chemicals are clearly labelled and separately stored in secured compounds.

Safety Data Sheets and specifications are available, and samples have been taken of: and for cleaning chemicals and for lubricants in production areas.

All chemicals as sampled are suitable for the intended application.

Waste handling and spillage control is effectively managed. Sawdust and absorbent granules are present in case of spillage.

### 4.9.2 Metal control

The following type of sharp metal equipment is used: blades, saws, knives, security knives. No snap-off blades used. A knife handling policy is in place, P-BXT-NL-10008 “Messen en handschoenen regime” v18 13-07-2026.

Several examples were seen on the factory inspection and observed to be in a satisfactory condition.

Condition and integrity are monitored: by PRE-SSOP on daily hygiene audits; see section 3.4.4 for details.

Staples, paper clips and drawing pins are not used in open production areas.

Daily review of amount of knifes and technical status recorded on F-BXT-NL-10159 “Controle messen en handschoenen” v4

### 4.9.3 Glass, brittle plastic, ceramics and similar materials

Monitoring of glass / brittle, plastic and ceramic items is done through: SSOP/PRE-SSOP checks.

Records were seen. A glass / hard plastic register is in place and records the location and condition of glass / hard plastic on **F-BXT-NL-10057.** Glass / hard plastic audits are regularly (4x per year) carried out by QA and daily by production department on Pre-SSOP and SSOP.

Besides daily check, monthly audits are executed by the verification of the building inspection by QA / maintenance department, which is documented as a map of the specific department. Verified within the traceability test and seen internal audit reports. Follow up of action points is demonstrable.

No glass incidents to date took place since the last audit. During site tour seen, torn and damaged forearm protectors in the ham section (**see minor NC**).

Staff is well trained in process and mock incidents which were part of the training (training is repeated at least once per two years).

Windows are protected against breakage with foil.

**The following supporting evidence was seen:**
- Monthly maintenance inspection March 2026 and 02-06-2026
- Quarterly glass / hard plastic inspection 24-03-2026 (cutting area), 02-06-2026 (middles) and 24-06-2026 (veredeling)

### 4.9.4 Products packed into glass or other brittle containers

No glass packaging activities in place – not applicable.

### 4.9.5 Wood

Wood is not allowed (and not present) near open product areas.

### 4.9.6 Other physical contaminants

**Describe any other specific controls on physical contamination such as packaging:**
De-boxing and debagging procedures include controls for physical contamination and is executed in separate areas.

**Management of portable handheld equipment:**
Metal detection is used. Single piece detectable pens are used with no small parts evident.

Special crates are used to store small equipment to be used during deboning.

No specific issues seen – there is a protection of the equipment for packaging falling into the product. Blue metal detectable pens and plasters are used, and paperclips / staples are not allowed (verified during audit on production floor).

Other types of control for contamination not covered in section 4.9 are not required.

## 4.10 Foreign-body detection and removal equipment

### 4.10.1 Selection and operation of foreign-body detection and removal equipment

Detection equipment (metal detection) is installed as result of the risk analysis and is controlled as a CP.

The sensitivity of control measures is appropriate as determined through validation study.

No other types of foreign body contamination removal are used.

Escalation procedure in place in case of breakdown incidents. Detected foreign materials are evaluated and analysed by QA.

No foreign bodies detected recently.

**The following evidence was reviewed**

The HACCP study determined the metal detection steps as a CP. Only B to B products. The sensitivity of the control measures is appropriate. The sensitivity of the metal detectors is listed for all metal detectors on site.

This includes the combination with used test rods size, type of FP to test, volume size of boxes and type of product to detect (density).

Annual verification performance checks are implemented (Ultimo) of all metal detectors, incl. justification of locations and sensitivity.

Good attention was seen on usage of (blue) plastic used as covers or packing material, inner liners to avoid contamination as plastic is listed in the top 3 of complaints.

### 4.10.2 Filters and sieves

No filters or sieves used.

### 4.10.3 Metal detectors and X-ray equipment

Metal detection equipment installed as result of the risk analysis and are controlled as a CP.

Monitoring frequency: depends on type and location of the metal detector, described on the list used for documentation of the checks. All checked at start / end of the day, check in between. After breaks depends on type of product / line.

Metal detection verification is performed through test sticks. The testing procedure is found to be suitable. No history of failed (metal) tests.

Metal detection; test bar with bullets:

Flex fresh: Fe 5.0 mm - non-Fe 6.0 mm - SS 7.0 mm

Bacon / shoulders: Fe 4.0 mm - non-Fe 5.0 mm - SS 8.0 mm

Vacuum: Fe 3.5 mm – non-Fe 4.0 mm - SS 6.0 mm

Tongue: Fe 2.0 mm – non-Fe 2.5 mm - SS 4.0 mm

Corrective actions are clearly defined in the CP control plan. Data of the metal detectors is available in the documentation. E.g. the sensibility of most of the detectors is clear. An automatic rejecting and / or belt stop and or alarming system is in place.

Metal detection CP was tested during this audit. Correct operation was observed in line with the work instruction. During vertical test metal detection was checked including check on maintenance and calibration, ok.

In case of detection of foreign body contamination, the material is analysed by QA/QC, al listed per location / metal detection. Less findings of FB metal by metal detection.

**The following evidence was reviewed**

- Seen on-site demonstration metal detector test. Employees for monitoring are trained by instructions.
- Maintenance metal detectors by :
  - Spareribs, 26-03-2026
  - packing Flexvers 33002300119, 27-03-2026
  - packing Flexvers 21600212063, 27-03-2026
- Maintenance metal detectors by :
  - Packing line 311000379, 18-05-2026

## 4.10.4 Magnets

Magnets are not used.

## 4.10.5 Optical sorting equipment

Optical sorting equipment is not used.

## 4.10.6 Container cleanliness – glass jars, cans and other rigid containers

No glass jars and no rigid containers.

## 4.10.7 Other foreign-body detection and removal equipment

No other foreign-body detection and removal equipment is used.

## 4.11 Housekeeping and hygiene

Cleaning is performed by: and own employees.

Documented cleaning and disinfection procedures are in place and maintained for the building, plant and all equipment. Examples cleaning procedures seen included: frequencies, applied agents, procedures and cleaning schedules.

Cleaning methods described are found to be suitable, seen plan of 2026.

Cleaning is done as common in the branch: rinsing, foaming, rinsing, disinfection, rinsing. This is done on a daily base. Four of five days alkali cleaning and on 1x / week acid cleaning.

Cleaning records were reviewed in both the traceability exercise and on the factory inspection with no issues noted. Cleaning records detail the cleaning requirements stipulated in clause 4.11.2.

Broken and dirty “materiaalkratten” in the DGS, Flexvers and spare ribs areas. A dirty spray bottle containing disinfectant at the “opknaptafel” in the parts cold store (**see minor NC**).

Examples records seen: Seen pre-SSOPs for all areas from reception of pigs until dispatch (expedition). Daily start-up checks with visual inspections are carried out. Actions are followed up correctly direct by own employees or communicated with to be followed up during the next cleaning moment by

Cleaning is monitored through: visual inspection, residue checks, agar samples and swaps.

Limits of acceptable and unacceptable cleaning performance is defined for food contact surfaces and processing equipment. Listeria absent and agar scores must be ok, in case of higher scores (3 or 4) CSU / own cleaners are informed and resampling is requested.

Limits are set for rinsing water residues for the washing of crates. Corrective action is defined on SSOP.

Areas visited on the factory inspection were observed to be clean and tidy.
Specific cleaning operations seen during the audit: cleaning, swapping of condense, cleaning in between in slaughter department, which was carried out in most situations conform work instruction and cleaning agent manufacturers instruction.

**The following evidence was reviewed:**
- P-BXT-NL-10012 “Controle reiniging en desinfectie” v7
- P-BXT-NL-10015 “Algemene beschrijving reiniging en desinfectie”
- F-BXT-NL-10005 “Verificatie reiniging en desinfectie” v3
- Residue check week 27 – 29 all ok

## 4.11.7 Cleaning in place (CIP)

A cleaning in place system is used for the cleaning of the blood vessels and tank (by product managed by ). CIP process blood vessels is verified with agar sampling. Results are all good.

## 4.11.8 Environmental monitoring

The environmental monitoring programme is detailed in: **P-NL-FOOD-10016.**
The programme is risk-based and includes frequency of testing, organisms to be included, typical sampling areas and procedures for out of specification results.

The programme monitors for: Listeria, TPC, Enterobacteriaceae. Frequency of testing, procedures for out of specification results are identified and verified. The environmental monitoring verified results 2025 - 2026 YTD: weekly sampling of parts of the processing areas (40 samples). In generally every department is sampled 1 x 8 weeks. Examples seen of results not ok (3 and 4 score), (cleaning company) was demonstrably informed, re-sampling is done and if still not effective, extra measures applied.

A clear review and trend analysis is in place, discussed during morning meetings (huddles) and Tier meetings, recorded in quarter review. Key data and performance are provided as input to the management review (no issues).

The programme is found to be suitable and effective.

The level of environmental monitoring performed is commensurate with the final product risk.

**The following evidence was reviewed**
- Listeria swab results 2025 – 2026 YTD all zero. Monthly 5 swabs of different areas.
- Results contact plates hands, clothing, air 03-03-2026 and 02-06-2026
- Results contact plates 41x / 2 weeks new building, week 28
- Results contact plates 41x / 2 weeks old building, week 27 and 29
- Temperature check stove 03-06-2026 37,9°C, decreased to 37,0°C

## 4.12 Waste and waste disposal

Waste is categorized in: **cat. 2 and cat. 3, plastic, paper, rest.**
All waste containers were identified with contents.

The factory was seen to be clean and tidy with waste well controlled, and no evidence of spillages were observed.

Waste removal is contracted to: Cat. 2 and cat. 3 is removed by / stored separate and chilled.
Trademarked waste materials are not present.
Records of destruction are being retained.

**The following evidence was reviewed**
- Other types of waste are paper, carton, plastic, metal, wood, chemicals and residual waste. Company is contracted for the removal of these types of waste.
- Wastewater is after treatment disposed in the municipal sewage canal. Wastewater treatment is managed by an external company next to the site. Company has a clear policy to minimize the amount of waste.

## 4.13 Management of surplus food and products for animal feed

N/A

## 4.14 Pest management

Pest control is contracted to .
The scope is detailed as: rodents, flying and crawling insects.

Presence of rodents (25 rats) and cockroaches since last BRCGS audit. None observed during the BRCGS audit. Infestations are also inside the building (canteen) and correctly identified and treated.

Routine visits per year: 8 x / year, last routine visits 28-05-2026 and 07-07-2026.
Content of routine inspection: rats, mice, crawling insects and EFK devices.
In-depth inspection (PRI) performed: **04-02-2026.**
Frequency is suitable.

Documentation was well maintained and visit reports fully completed with actions closed in a timely manner.

**The following evidence was reviewed**
- system / dashboard overview results
- Certificate pest control technician valid until 19-12-2030
- Certificate pest control technician valid until 21-01-2028
- Certificate IPM 09-01-2022
- Contract 24-03-2016
- Trend analyses rats, mice, flying insects June 2025 – July 2026
- QA inspection 03-12-2025
- Fogging the crawl space against moth flies 20-06-2026

## 4.15 Storage facilities

Storage spaces are maintained in hygienic conditions. Waste materials and chemicals are stored separately.

Temperature controlled storage is required, and this is monitored continuously through a central system with alarms when out of set limits.

No products contain allergens, so segregation is not required for allergens.

Chemicals and (packing) materials are stored separately from (finished) products. Electric powdered fork-lift trucks are operated.

Only small stocks of packaging materials are kept on site and stock rotation is via SAP and manual system identifying FIFO usage.

Delivery/Storage record sheets are in place for each raw material & packaging item and are kept at their storage location; seen within the traceability exercise with no issues noted.

No outside storage of goods, only dolavs to be cleaned stored outside. Several silos for slaughtering by-products outside.

No controlled atmosphere storage.

**The following evidence was reviewed:**
Storage facilities which are temperature controlled by external service supplier and monitored by maintenance.
Storage temperatures are controlled automatically via the system.

## 4.16 Dispatch and transport

The transport of finished goods is all outsourced (mostly Distrifresh) to external service providers managed by HQ. There are company own terminal trekkers.

Temperature checks and hygiene monitoring controls are in place for: unloading returns (very limited amount) and loading finished product (CCPs).

Records of evidence were reviewed during the factory inspection and through the auditor vertical audit (see details below)

Vehicles back directly onto loading bays, which are closed with shutter doors when not in use.

**The following evidence was reviewed:**
- Temperature checks managed as CCPs, 5 checks (back, middle, front) per load per group of articles, by competent employees.
- P-FOOD-10149 “Planning transport audits”, risk based on amount of trucks
- P-FOOD-10037 “Eisen transport vlees” v17: including, not leaving the lorry unattended
- P-FOOD-10040 “Invullen checklist transport vlees” v8 27-09-2023
- P-FOOD-10032 “Transport audit on 30-03-2026: temperature 4,3°C / agar score 0,375 / temperature graph during transport ok
- P-FOOD-10032 “Transport audit” on 29-04-2026: temperature 4,3°C / agar score 0 / temperature graph during transport ok
- F-BXT-NL-10003 “HACCP questionnaire transport vlees”, seen for and 12-03-2025
- IFS Logistics valid until 25-11-2026

## Details of non-applicable clauses with justification

| Clause/Section Ref | Justification |
|---|---|
| 4.4.6 | No elevated walkways, access steps or mezzanine floors that are adjacent to or pass over production lines |
| 4.9.1.2 | No use of strongly scented or taint forming materials. |
| 4.9.2.2 | No uses staples, clips and drawing pins |
| 4.9.4 | No product packed in glass of brittle containers. |
| 4.10.2 | No sieves or filters in use |
| 4.10.3.5 | No X-ray in use |
| 4.10.4 | No magnets applied. |
| 4.10.5 | No optical sorting equipment installed. |
| 4.10.6 | No packing in glass jars or other rigid containers. |

## 5. Product control

### 5.1 Product design/development

The product design/development procedures are clearly detailed in: **Master Data Management application (MDM)**

There is a process of defining the product brief and agreeing the brief with external customers. HACCP review and sign off, sample agreement, trail review and customer sign off.
Product is mostly minor product adjustments rather than new developments or new materials and allergens. Developments are mostly for customers who provide guidance in each instance.

**HACCP team involvement and agreement on customer requirements:**
HQ is responsible for product and process alterations, and CAPEX system applies.
HACCP reviews are held and include HACCP assessments made by the HACCP team leader for each new cut. The HACCP team also considers any amendments to standard processes.

HQ reviews process specifications and agrees/discusses information areas with customers before final agreements are made.

**Trials:**
Trials are agreed between the production manager and customers and regular meetings with customers are in place. Seen validation (not finished yet) of new product /process for China: packing cleaned and washed stomachs on same day as slaughter day, to be stored frozen.

**Shelf-life validation:**
Shelf-life trials follow documented protocols that reflect appropriate conditions. The process is the same for existing products. Results are recorded and most used is the microbiological sampling plan.

**The following evidence was reviewed:**
- F-BXT-NL-10120 “Risico-beoordeling nieuwe machines” (at the time of the audit new document F-NLFOOD-10086 v1 31-03-2026)
    - Cobot Flexvers 18-03-2026
    - Stomachs for export to China 22-01-2026, still test setup
    - Legs cutter 14-08-2025, signed off by QA, production manager, preventive manager, maintenance manager, plant manager
    - Not present for new spareribs production line (minor NC par. 4.6.3)
- Shelf life tests, TVC / Enteros / organoleptic:
    - Planning 2026
    - 19-01-2026 mager met 70/30 vacuum thinner foil. Production + 14 – 15 – 16 days
    - 09-02-2026 platte bil vacuum. Production + 14 (ok) – 21 (ok) – 28 (not ok)

## 5.2 Product labelling

The following documentation describes the process: P-BXT-NL-10002.

**Legislation in countries of sale:**
Labels are provided for customers but not consumers. Labels are created and printed on site at the point of application and are basic labels with relevant information only and no artwork; seen on the factory inspection. Country of origin, sequential number, slaughter- and/or production date, Licensed authority number, plus any customer requested information.

**The following evidence was reviewed:**
- Labelling is according to legal aspects as required by the company; several checks done during production tour and within traceability trial. Bulk products are delivered with product specifications based on customer requirements and legislation aspects. Labelling text is based at product description B-to-B, production date, shelf-life term, country of origin and storage conditions. The system is the ‘’cloud’’, all used label printers are linked to . In the client specifications are taken up the lay-out and content of all labels (for boxes and product). Seen for art. 35293 Loin.
- Labels seen during site tour all complied with dates and autorithy numbers

## 5.3 Management of allergens

The following documents form the controls in this area: **P-VION-10000 and P-BXT-NL-10116**

Allergens handled on site are sow milk and sulphatic in the offal production department. No risk of contamination with allergens as concluded in HACCP analyses.

The risk assessment covers all potential sources, including cross contamination. Measures implemented include: cleaning and segregation.

**Claims for individuals:**
No allergen claims are made.

**The following evidence was reviewed:**
The risk of allergens via employee / food stuff is part of the risk assessment. This is controlled with the following measurements: it’s not allowed to wear the work coat in the canteen, and all employees need to wash and disinfect their hands before they are entering the production facilities and the wearing of gloves.

Allergen management is part of the refresher training for employees and introduction training for new starters. No claims were made e.g. “free of”.

## 5.4 Product authenticity, claims and chain of custody

Product authenticity is detailed in: **P-NL-FOOD-10049.**
P-BXT- N-10248 daily verification by exclusive trained employee. Beside this the site is IFS PIA certified.

**Knowledge of the Team**
The food defence and fraud team are also the site HACCP team. The team has completed relevant training. The use of raw material and supplier risk assessments demonstrated knowledge of the principle of vulnerability assessment.

A food fraud assessment is managed by HQ, using the criteria probability of occurrence vs probability of non-detection. This covers all mandatory requirements of BRCGS. The vulnerability assessment is documented as Process integrity control plan/assessment.

**Examples raw materials, risk level and mitigating controls:**
Significant vulnerabilities have been determined. Examples include:
VKI checks on pigs: FSA, FSA+, FS, IKB (and Standard), QS and SQMS pork meat.
Appropriate mitigation measures are developed and implemented, which include:
Chain of custody audits are done (IFS PIA) by an external certification body (LRQA).

RASFF check and daily check NVWA on site.
Product integrity officer (QA manager) is coordinating the EKS inspectors.
Daily mass balance is performed of GF and GF.

A review of the vulnerability plan is programmed to be completed annually.
Date of the last review: **12/08/2025** included in MR

**Claims:**
A claim is made the Chain of Custody, the chain is communicated, and clear devaluating procedures apply following the IFS PIA audits

**The following evidence was reviewed**
- IFS PIA audit by LRQA
- Process integrity control plan/assessment
- Mass balances explained by QA

## 5.5 Product packaging

The packaging materials for finished products are: **naked hanging on hooks, naked in crates, in foil, wrapped in foil, in foil vacuumed, in crates, in dolavs, in solid board boxes.**

Suitable packing procedures and materials are in place with relevant (food contact suitability/migration) specifications. The packing suppliers are GFSI certified.

Specification and declarations of conformity seen for the packaging used in the traceability test.

**The following evidence was reviewed**
- See traceability / packing material of trace test / onsite verification during the audit
- Packing material specification / client approval process and management is performed by HQ

## 5.6 Product inspection, on-site product testing and laboratory analysis

The testing program is outlined in: P-NLFOOD-10016 and P-BXT-NL-10009 “Planning monstername”. Livestock / pigs are controlled by a veterinarian during the arrival at the slaughter department and during the process in the clean slaughter line (control for diseases intestinal check).

A plan of analysis is available and systematically followed. Product samples are taken from production at the slaughter line (legal compliance) and inline after cutting.
All analyses (hygiene grams, microbiology, pathogens, blood samples, shelf-life water, etc.) are subcontracted to an accredited laboratory operating in accordance with ISO 17025:
and ( ). A microbiological monitoring program P-BXT-NL-10009 and shelf-life testing programs (P-FOOD-10010 and P-NLFOOD-10165) are in place and were assessed.

**Types of tests and frequency:**
Samples are analysed on a scheduled basis by an external accredited lab on Salmonella, Listeria, STEC, Staphylococcus aureus, TVC, E. coli and others.

Trend graphs are applied. Results are analysed at trends at a monthly base (Q report). Results of the monitoring programme are part of the quarterly based review of the food safety and quality system. Results are verified, stable trends seen.

The frequency of monitoring depends on the risk:
Carcasses own production: daily microbiological analysis of TVC, Enteros, (pool) Salmonella.
Trimmings: daily microbiological analysis of TVC, Enteros, (pool) Salmonella and listeria.
Deboned meat: 1 x / week microbiological analysis of TVC, Enteros, Salmonella and Listeria.
Technical cuts, by-products and organs: 1 x / 2 weeks microbiological analysis of TVC, Enteros, Salmonella and Listeria.
Sampling process is verified for randomly selected for traceability product lot.

Monitoring for contaminants as heavy metals, dioxins and PCBs, OXTA, PFAS, pesticides and veterinary drug residues is carried out in accredited laboratories up to 4 times a year ( ) – results verified no deviations from the limits for the past 12 months.

**The following evidence was reviewed:**
Trend analyses in Quality Trends of swabs from carcasses do show good results within the limits (regarding to EU 2073/2005)

**No onsite laboratories**

**The following evidence was reviewed**
- P-FOOD-10008 “Micro analyse standaarden”
- P-FOOD-10009 “Collection of samples for micro analyses”
- Trend analysis July 2025 – July 2026 TVC and Enteros carcasses, heads, veredelde parts, trimmings, MSM: all below max. limit.
- Lab results pork back week 23 2026 TVC 2,58 / Enteros 1,00
- Lab results blood analysed by 07-07-2026 / 09-07-2026 8 samples all below max. limit (450.000), but not all below target value (45.000)
- Lab results chemical analyses:
    - 4x / year PFAS pork meat and livers 08-12-2025 and 10-03-2026

- 1 x / year (+ extra for specific customers) heavy metals 02-01-2026, ochratoxine A 21-05-2026, organochlor, dioxine 03-04-2026
- Tetracycline (third countries) 10-02-2026

## 5.7 Product release

The site has ensured that finished product is not released unless all agreed procedures have been followed. Hold and quarantine procedures in place in event of non-conformance. Order wise stock control system is used for release of finished product stock. There is no positive release requirement unless specifically requested by customer.

**The following evidence was reviewed**
Products are released after the pre-shipment controls (e.g. packing / temperature / batches), which are carried out by the expedition department. The verification of CCP controls is part of the pre-shipment process. Verification procedure and checklists were assessed during the audit at dispatch and during the vertical audit (F-BXT-NL-10084).

## 5.8 Pet food and animal feed

No pet food is produced.

## 5.9 Animal primary conversion

The vet. certificate is applied for each supplied batch of pigs/farm, which was checked for during the on-site audit and during the vertical trace test. All supervised by the Dutch government NVWA who is on site during working hours. Carcasses are chilled within 17 hours to < 7ºC which was verified on daily basis as temperature before cutting is measured.
Traceability is maintained by scanning / use of ERP system , which was verified during on site audit and the vertical trace test.

Purchasing processes of raw materials (ingredients) and packaging materials are managed by the HQ via approval procedures (incl. GFSI / chain certification status and questionnaires) and contracts. A risk assessment was drawn up by HQ for potential prohibited substances. The Vion plants are only authorised to order products or services from approved suppliers:

- Procedure suppliers audit (P-FOOD-10023)
- Procedure food supplier assessment (P-FOOD-10025)
- P-FOOD-10032 supplier assessment non-food and services.

There's an audit plan for external suppliers, based on risk management. Site has no external suppliers of pork meat, except the middles from the Vion site in Apeldoorn (also BRCGS certificated).
Product integrity procedure P-Food-10049, supplier risk assessment is a continuous ongoing process. All suppliers are evaluated annually. Parameters are e.g. certification status and quality of deliveries (e.g. illnesses). See also clause 3.5.

| Details of non-applicable clauses with justification | |
|---|---|
| Clause/Section Ref | Justification |

| | |
|---|---|
| 5.2.3 | No claims in use to satisfy a consumer group |
| 5.3 | No allergens on location as ingredient |
| 5.6.2.2 | No testing laboratory on site |
| 5.8 | The site does not produce pet food and animal feed. |

## 6. Process control

### 6.1 Control of operations

**The processes covered on the site include:**
Pigs receipt preparation (offloading and resting), slaughtering, cooling, cutting, packing, dispatch and waste disposal.

During this audit all processes were in operation and were reviewed as part of the auditor traceability exercise.

During observation of the “steken” process, it was noted that for several carcasses, blood flowed directly into the blood designated for human consumption, without the initial blood being diverted to the cat. 3. Following this observation, this blood was directed straight to cat. 3 (**see minor NC**).

Documented procedures and work instructions are in place to ensure consistent product is produced and packed.

After cutting each carcass, the knife is rinsed and sterilised in the hot-water steriliser, however, only the tip of the knife is sterilised, and for less than 1 second (**see minor NC**).

There are dedicated logs for each process which include traceability, process steps, process parameters such as times, temperatures and volumes, set up approval (release) and packing.

The product is subject to CCP and CP checks and these were seen (see details below at evidence).

No products outside of the scope are handled.

**The following evidence was reviewed:**
- On-site assessment all processes and areas
- The control of operations is partly at visual inspection during the process by operators and supervisors
- Checks are made at the SSOP forms for process controls, such as temperatures, cutting specifications, pack control
- Via a camera system and the system there’s a real time overview at the control of operations
- Daily huddles with management, production, maintenance, QA, etc.

### 6.2 Labelling and pack control

There is a clear process and line clearance check for labelling and removal of labelling from the line at a product change over (most labels are printed during packing, so no preprinted labels available on the line.

Records of checks were sampled from previous days and from the vertical audit trail.

At the time of the audit there was a change over on the lines. This was witnessed during the site assessment and found to be appropriate.

There is no online verification equipment for the correct label (only B to B labelling).

Label checks take place at the start and end of production batch. During the site audit in ham cutting departments the product (new slaughter day) change is monitored. The line was left open and another day sign was placed. No removal of products (trimmings, cat. 2 and cat. 3) needed, because The ERP system ensures that two batches appear on the final label. Labels were changed via the system . No need for change of packaging.

**The following evidence was reviewed**
Onsite assessment and vertical trace test.

## 6.3 Quantity, weight, volume and number control

Weight control is on weight (kg) as seen on the factory inspection and within the trace exercise and satisfactory. Daily checks of scales with weights. Bulk quantities are sold.

There's a procedure on testing the online checkweighers. The test results are recorded. Clear corrective actions were defined in case deviations were seen during these daily tests. Beside this daily test by the company, the scales are calibrated by a specialized company on yearly basis.

**The following evidence was reviewed:**
- PRE-SSOP daily scale check
- Calibration report floor scale 03 12-12-2025
- Calibration report scale 05 07-03-2026

## 6.4 Calibration and control of measuring and monitoring devices

There is a clear schedule of calibration for all equipment. The records of calibration were checked for:
- **Metal detectors, x-ray, scales, thermometers, chemical dosing equipment, CO2 detection devices**

Critical measuring equipment are listed: thermometers (CCP related), weighing scales, fat analyser and metal detection equipment, CO2 stunning. These are calibrated. Records are available.
The equipment used to measure on CCPs is identified. List of measuring devices in place. Calibration due date on equipment. Thermometers calibrated 6x / year internal with calibrated reference device and 1x / year external calibration.

**The following evidence was reviewed:**
- External calibration records thermometers 125 / 130 / 132 / 208
- External calibration reference thermometer on 21-05-2026
- External calibration records 937189 and 943488
- P-BXT-NL-10123 "Kalibratie weeg- en meetmiddelen" v18. Every 2 months internal calibration thermometers. Limit at 0°C is 0,2°C and at 100°C 0,5°C.

## Details of non-applicable clauses with justification

| Clause/Section Ref | Justification |
|---|---|
| 6.2.4 | No on-line label verification. |

## 7. Personnel

### 7.1 Training: raw material handling, preparation, processing, packing and storage areas

Induction training is required for all new employees and includes the company hygiene rules, (incl. HACCP, food defence, allergens and general hygiene rules). There is a yearly refresher training for inductions in place (1x per calendar year refreshment training is scheduled).

Training needs for personnel engaged in activities related to product safety, quality and legality are further defined in a competence matrix.
Employee training is defined in a documented procedure. For operators there are records of sign off against key tasks.

At this visit, the recording of the trainings was seen, performed in the App “ ”, samples taken of several employees/functions, no deviations seen. Clear competency records were kept in an overview (excel) and refresher training records were seen. End-of-year meetings are scheduled with employees.

There’s an introduction training (incl. HACCP, food defence, allergens and general hygiene rules) for all new and re-entering employees including temporary workers by HR department. Every day new workers are trained, and everyday training capacity is available.
Employees engaged in the control of CCPs are trained regularly by QA. Employees working in the blue part of the slaughtering department and stable get a dedicated training about animal welfare aspects.
Labelling is trained on the job (no consumer products), labels are generated by the ERP system and scanned, no label, no identification, this was managed well.
For several employees training records are verified, if they fit to their function, incl. the test results of the training followed finishing the training sessions.

**The following evidence was reviewed:**
- HACCP training for managers (maintenance) 03-11-2025 / 12-10-2016
- HACCP refresher training 21-10-2025 (90 P) / 16-09-2025 (80 P) / 21-04-2025 (70 P) / 31-07-2025 / 21-10-2025 (100 P)
- Intake training 13-05-2026
- CCP 2 – 5 25-04-2022 / 25-04-2022 / 21-04-2022 / 29-04-2025
- CCP 6 5-09-2011
- CCP 7 – 8 25-11-2013
- Animal welfare (emergency slaughter) 21-02-2025
- PRE-SSOP and SSOP training 26-02-2016

### 7.2 Personal hygiene: raw material handling, preparation, processing, packing and storage areas

Hygiene policy is clearly communicated as part of induction programme and displayed on the wall in key areas. All requirements of the Standard are addressed. No deviations from the policy were observed during the audit. Blue, metal detectable plasters are provided in the first aid box.

Visitors are required to complete a questionnaire prior to entrance at the porter office.

Adequate facilities in place. Handwashing takes place at entry of the production area and warehouse area. No issues observed regarding handwashing stations. Staff canteens and consumption areas are segregated from production areas. Hygienic conditions are maintained. No issues observed during the audit.

Changing rooms are located close to production facilities and found to be clean and tidy. Personal items stored in lockers. Company clothing handed out every new working day and on request if dirty. Staff change into workwear on site. Toilets are accessible from the locker rooms, segregated from production. Designated smoking areas are available outside of the main buildings.
No company clothing is worn during coffee / lunch breaks, only trousers are allowed and hair nets are prohibited.

**The following evidence was reviewed**
- Visitor registration including questionnaire
- Vion brochure, incl hygiene rules handed out at the porter
- Effectiveness of the hygiene procedures for personnel is part of the SSOP
- Samples of each batch metal detectable plasters is demonstrable tested

## 7.3 Medical screening

Staff medical screening is limited under national privacy law but executed as enforced by some third countries for export licenses. Repeated every 5 years. Illnesses and injuries which might cause a risk to product safety must be reported according to the company hygiene rules.

The medical screening is part of the intake of new employees and part of the instructions to visitors. The site makes all visitors, new starters and contractors aware of the need to report infectious disease during the intake by the porter before entering the site, signature is required. In case of a disease the company is consulting a specialized company doctor who is weekly on-site. Persons (incl. visitors) who are suffering from relevant infectious diseases are not allowed to enter the production facilities.

**The following evidence was reviewed:**
- Medical screening 26-06-2023
- Visitors log at porter

## 7.4 Protective clothing: employees or visitors to production areas

Work wear of personnel includes suitable, protective clothing (including hair/beard nets) that provides adequate coverage. Clothing has no external pockets above waste or sewn-on buttons. Gloves and aprons used in production processes. White and blue clothing is available for visitors.

Laundering of clothing is done by external service provider (professional laundry service). No in-house washing of clothing is done.

Segregation of clean and dirty clothing is effectively managed; there are dedicated closed bins for dirty clothing. Clean clothing is provided in dedicated areas by the laundry service provider.

**The following evidence was reviewed:**
- Acceptance of clean clothing observed on entrance of cutting area.
- Hygiene rules are effectively enforced and daily inspected as a part of the SSOP control.

| Details of non-applicable clauses with justification | |
|---|---|
| Clause/Section Ref | Justification |
| 7.4.6 | No items of personal protective clothing that are not suitable for laundering are provided. |

| 8. Production risk zones – high risk, high care and ambient high care production risk zones |
|---|
| 8.1 Layout product flow and segregation in high-risk, high-care and ambient high-care zones |
| Not applicable |
| 8.2 Building fabric in high-risk and high-care zones |
| Not applicable |
| 8.3 Equipment and maintenance in high-risk and high-care zones |
| Not applicable |
| 8.4 Staff facilities for high-risk and high-care zones |
| Not applicable |
| 8.5 Housekeeping and hygiene in the high-risk high-care zones |
| Not applicable |
| 8.6 Waste/Waste disposal in high risk, high care zones |
| Not applicable |
| 8.7 Protective clothing in the high-risk high-care zones |
| Not applicable |

| Details of non-applicable clauses with justification | |
|---|---|
| Clause/Section Ref | Justification |

| | |
|---|---|
| | |

| 9. Requirements for traded products |
|---|
| 9.1 The food safety plan - HACCP |
| Not applicable |
| 9.2 Approval and performance monitoring of manufacturers/packers of traded food products |
| Not applicable |
| 9.3 Specifications |
| Examples of traded products: <list some examples of traded products><br>All traded products within the scope are included: Yes/No<br>Specifications are reviewed every three years: Yes/No<br><br>The following evidence was reviewed: |
| 9.4 Product inspection and laboratory testing |
| Not applicable |
| 9.5 Product legality |
| Not applicable |
| 9.6 Traceability |
| Not applicable |

| Module 11: Meat Supply Chain Assurance | |
|---|---|
| **Scope** | Click or tap here to enter text. |
| **11.1 Traceability** | |
| Click or tap here to enter text. | |
| 11.2 Approval of meat supply chain | |

| |
|---|
| Click or tap here to enter text. |
| 11.3 Raw material receipt and inspection |
| Click or tap here to enter text. |
| 11.4 Management of cross-contamination between species |
| Click or tap here to enter text. |
| 11.5 Product testing |
| Click or tap here to enter text. |
| 11.6 Training |
| Click or tap here to enter text. |

| **Module 13: Meeting FSMA Requirements for Food – July 2022** |
|---|
| Preventive Controls for Human Food: 21 CFR Part 117 (Clauses 13.1.1 – 13.1.33) |
| Click or tap here to enter text. |
| Preventive Controls for Animal Food: 21 CFR Part 507 (Clause 13.2.1) |
| Click or tap here to enter text. |
| Food Defence: 21 Part 121 (Clauses 13.3.1 – 13.3.11) |
| Click or tap here to enter text. |
| Sanitary Transportation: 21 CFR Part 1 Subpart 0 (Clauses 13.4.1 – 13.4.9) |
| Click or tap here to enter text. |
| Produce Safety: 21 Part 112 (Clauses 13.5.1 – 13.5.18) |
| Click or tap here to enter text. |

| 14.1 Additional Specifier Requirements |
| --- |
| 14.1 Traceability |
| Click or tap here to enter text. |
| 14.2 Environmental Monitoring |
| Click or tap here to enter text. |
| 14.3 Product inspection and laboratory testing |
| Click or tap here to enter text. |
| 14.4 Protective clothing: Employees or visitors to production areas |
| Click or tap here to enter text. |