



BRINKER
INTERNATIONAL®

GLOBAL SUPPLIER QUALITY
STANDARDS

1st Edition

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Table of Contents

Introduction		4
Section 1	Quality Systems Management	8
Section 2	Purchased Material Control	8
Section 3	Documentation	9
Section 4	HACCP	10
Section 5	Good Manufacturing Practices	11
Section 6	Pest Control	13
Section 7	Foreign Material Control & Detection	13
Section 8	Food Security	14
Section 9	Allergen Control	15
Section 10	Traceability/Recall & Code Dating Requirements	16
Section 11	Control of Non-Conforming Product	18
Section 12	Third Party Inspections	18
Section 13	Specification Requirements & Product Evaluation	19
Section 14	Microbiological Testing	21
Section 15	Process Capabilities & Statistical Analysis	23
Section 16	Product Storage and Logistics	23
Frequently Asked Questions		26
Appendix/Tools		31

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Introduction

As a supplier to Brinker International it is important to understand that Brinker places a major focus on the Quality and Safety of the products that our guests will enjoy. This Global Quality Standards manual outlines quality, safety, and sanitation requirements that companies must comply with in order to qualify as an approved supplier. Compliance with these requirements does not guarantee that business will be awarded.

Each of the 16 sections included in this manual has a description section that summarizes the topic and the specific requirements that must all be met. All 16 of the sections are critical to operating at the highest level of quality and safety and must be in compliance in order for Brinker to consider utilizing a supplier. It is important to note that this Manual is a supplement to local, state, federal, and international regulations. All regulatory requirements must be met as well. Further, this manual does not replace any terms and conditions as stated on the Supplier Confidentiality Agreement.

The *Reference Materials* section of this manual is designed to state the specific requirements that encompass all product types whether it is packaging, food, or other product. In addition, the appendix section outlines any additional product-specific requirements that may be required for a company's particular product. Also included in the appendix are helpful references that can be used to assist suppliers in compliance with Brinker's Global Quality Supplier Standards.

Brinker International reserves the right to audit all facilities using these standards at any time.

If any changes such as primary contact information, facility address, raw materials, equipment, or any other change to the process occurs, suppliers must contact the appropriate Brinker International representative immediately.

Full compliance with the following system will lead to the safest and highest quality product available to the restaurants and guests.

Thank you for your commitment!

A handwritten signature in black ink that reads "T. M. Foegle".

Tom Foegle
Sr. Director, Quality Assurance and Food Safety

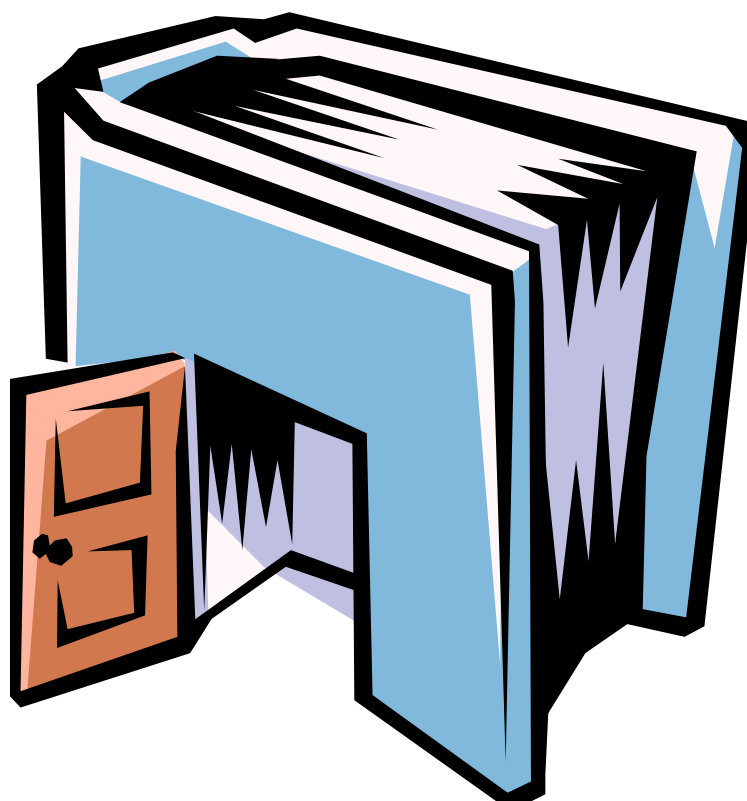
A handwritten signature in black ink that reads "Terry Stephenson".

Terry Stephenson
Vice President, Purchasing

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Reference Material

This section can be used as a reference to understand the details of the program.



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SECTION 1: Quality Systems Management

Description: Suppliers to Brinker International should have an established, implemented, and documented Quality Management System to ensure ongoing quality and food safety management and continuous improvement of all quality and food safety systems.

Requirements: =

The Quality Management system should include the following:

- 1.1 Clear direction through written food safety and quality policies and goals which have been communicated to all personnel.
- 1.2 Adequately trained personnel dedicated to the oversight of quality assurance and food safety.
- 1.3 Clearly established levels of responsibility and authority for the management of quality and food safety systems, along with established processes for effective communications across all areas of the organization.
- 1.4 Adequate resources for training of all personnel in their respective roles as well as the development of skills to ensure a positive impact on the quality and food safety systems.
- 1.5 Formation of an internal auditing team comprised of interdisciplinary personnel to review all components of the Quality Management System throughout the organization including but not limited to audits of the facility and grounds, review of GMP's, HACCP and other quality management programs.
- 1.6 Clearly establish processes for handling product complaints from external customers.
- 1.7 Established programs and processes for maintenance and calibration of all inspection, measuring and test equipment against industry or recognized standards. (i.e. scales, laboratory equipment, flow meters, thermometers)
 - 1.7.1 All records and documentation should be maintained for one year.
 - 1.7.2 Control systems must comply with all regulatory requirements (i.e. pasteurization chart recorders)
- 1.8 Suppliers conducting any laboratory testing and analysis on-site must follow and comply with the U.S. CFR, Title 21, Part 58 (Good Laboratory Practice for Non-Clinical Laboratory Studies). The laboratory must meet requirements consistent with accredited independent laboratory standards. Suppliers that utilize a third party laboratory must ensure the above standards are met.

SECTION 2 – Purchased Material Control

Description: Purchased Material Control is required to ensure that purchased raw material products conform to specified Brinker requirements and all applicable regulations.

Requirements: =

- 2.1 Purchased Material Control:
 - 2.1.1 The vendor must maintain a current list of suppliers of raw materials, including all ingredients, processing aides, internal and external packaging and labeling, palletizing materials associated with the manufacture of products intended for use in Brinker-owned or franchised restaurants.

- 2.1.2 Each supplier should maintain the following documents to be kept on file which shall be updated every year, at minimum.
- Letters of Guarantee
 - HACCP plan specific to product purchased. See Section 4.
 - Recall/Traceability program including an emergency contact list. See Section 10.
- 2.1.3 Quality Assurance and Food Safety audits of raw material suppliers shall be conducted annually and shall be made available to Brinker or a Brinker approved auditing company, upon request.
- 2.1.4 Refer to appendix for additional product specific requirements.

2.2 Raw Material Inspection Procedures:

- 2.2.1 The facility must maintain a written and documented raw material inspection protocol for each ingredient.
- 2.2.2 Records of inspection for all lots received must be kept and readily accessible upon request by inspection personnel or as needed by production personnel.
- 2.2.3 The facility must maintain a written procedure for hold and release that ensures all products allowed into production have been appropriately inspected and approved for manufacturing.
- 2.2.4 Where applicable, Certificates of Analysis should be obtained for all incoming lots of ingredients, showing compliance to those chemical and microbiological parameters which will impact finished product safety and quality.
- 2.2.5 The supplier shall implement a system to notify raw material suppliers when non-conforming materials are received and to ensure corrective action is initiated.

SECTION 3 – Documentation

Description: Documentation is important because these records support and verify all Quality Systems activities. All documentation shall be maintained on file and readily accessible for auditing purposes. Documentation must be maintained for a minimum of one year. Handwritten documentation should be in permanent ink. Electronic documentation must be secured and archived for integrity purposes.

Requirements: =

- 3.1 Systems should be in place for managing and controlling all Quality System documentation data and records. The following documentation must be maintained at a minimum:
- 3.1.1 Raw Material receiving forms ensuring compliance to specifications.
- 3.1.2 Process Control form(s) ensuring compliance to specifications using statistical process controls.
- 3.1.3 Formulation verification ensuring compliance to specifications and ingredient traceability.
- 3.1.4 Finished Product Evaluation as outlined in Section 13.

- 3.1.5 Quantities produced, retained (with disposition) and shipped (destinations).
- 3.1.6 Nutritional and labeling information. See Section 13.
- 3.1.7 Handling and storage requirements
- 3.1.8 All other documents noted in this manual.

SECTION 4 - HACCP

Description: In order to ensure the food is safe to the guests, Hazard Analysis Critical Control Point (HACCP) Systems must be implemented at the facility. It is best to establish a program utilizing a team that encompasses a cross-section of the facility (QA, Production, Maintenance, and other areas). Documentation must be provided to ensure each of the requirements below (4.2.7) has been satisfied. Remember, prerequisite programs like GMPs and Pest Control standards must be established before a HACCP system can be considered fully functional.

Requirements: =

- 4.1 The supplier is expected to manufacture under the guidelines in Hazard Analysis and Critical Control Point Principles and Application Guidelines as outlined in 9 Code of Federal Regulations (CFR) Part 417 and the Codex Alimentarius Commission's recommendation.
- 4.2 The facility must have an effective and verifiable HACCP program encompassing all phases in the manufacture of products specifically intended for distribution of Brinker restaurants. The HACCP program should be developed with the following principles:
 - 4.2.1 Identify hazards and assess the relative risks within the manufacturing system.
 - 4.2.2 Establish control points, which will effectively minimize those risks.
 - 4.2.3 Establish critical limits that must be imposed to maintain the controls.
 - 4.2.4 Establish monitoring procedures to ensure that critical limits are observed.
 - 4.2.5 Establish corrective action to be taken when critical limits are exceeded.
 - 4.2.6 Establish procedures to verify that the system is working.
 - 4.2.7 Establish record keeping procedures to document all parts of your HACCP system including:
 - Company Information
 - HACCP Team Member List
 - Prerequisite Programs In Place (Supported by Procedures/Documents for each Prerequisite Program)
 - Process Flow Records (outlining the system and indicating Critical Control Points (CCP's))
 - Process and Ingredient Hazard Analysis Reports (for each of the identified hazards) that establish reasoning/conclusions.
 - Monitoring Documents
 - Management and Employee HACCP Training Records
 - Verification Results

- Corrective Action Log/Deviation Report Form
 - A HACCP Manual which includes all of the above documents.
- 4.3 The HACCP program must be administered by a member of the management staff trained in the principles of HACCP. All production personnel must receive regular training in the principles of HACCP and must understand and be conversant in those CCP's that relate to their area of operation.
- 4.4 Documentation must be maintained on file at the facility a minimum of one year from date of manufacture or as dictated by the product shelf life.

SECTION 5 – GMPs

Description: All Brinker suppliers and distribution centers must follow Good Manufacturing Practices (GMPs) to ensure the production of safe, wholesome and top quality products which have been prepared, packaged and held under sanitary conditions free from contaminants.

Requirements: =

5.1 Compliance

- 5.1.1 A GMP program must be established and in use. The supplier is expected to manufacture under the guidelines of the Good Manufacturing Practices (GMPs) as outlined in CFR Title 21 part 110 and CFR Title 9 Part 308 or the Codex Alimentarius Commission's Recommendation on Personal Hygiene Practices – Recommended International Code of Practice, General Principles of Food Hygiene: CAC/RCP 1-1969, Rev. 4-2003, as it applies to your industry. As such, all processes relating to GMPs must be planned, documented and implemented.
- 5.1.2 Quality Assurance resources should be allocated to monitor all documented procedures and employee practices to maintain the highest standards which will meet or exceed all applicable governmental, industry and Brinker International standards.

5.2 Personal Hygiene Practices

- 5.2.1 The GMP program should include reasonable measures to ensure that all employees working with food, food contact surfaces and/or food packaging will conform to good hygienic practices to prevent contamination. This must include but is not limited to areas such as personal cleanliness, thorough hand washing, wearing proper outer garments, removing jewelry, wearing adequate hair restraints, and designated areas for eating, drinking and tobacco use.
- 5.2.2 The GMP program must include provisions for controlling disease in personnel, including a policy requiring personnel to report certain health conditions to their supervisors and a policy to exclude persons with certain health conditions from conducting any operation which may result in contamination, until the condition is corrected.

5.3 Education and Training

- 5.3.1 The GMP program must include training that is provided to all Plant personnel on the procedures and processes related to GMPs. This training must include appropriate

training materials and methods for new and existing employees.

Training must be documented and personnel must be able to demonstrate their working knowledge of GMPs.

5.3.2 Additional education and training must also be provided to those personnel responsible for identifying sanitation failures and/or food contamination. In addition, the responsibility for assuring compliance by all personnel to GMPs must be assigned to trained supervisory personnel.

5.3.3 Training records must be maintained for review at any time by Brinker International or a Brinker approved third party designee.

5.4 Sanitation

5.4.1 All Brinker suppliers must provide and maintain a clean, sanitary and contaminant-free environment for the manufacture, packaging and storage of wholesome food products.

5.4.2 The facility must have effective, documented Sanitation Standard Operating Procedures (SSOPs). These procedures should include a Master Sanitation Schedule that is maintained to specify the frequency, responsibility and documentation of routine maintenance cleaning and periodic deep cleaning tasks for all equipment and facilities which are involved in the manufacture of products specifically intended for distribution to Brinker International restaurants.

5.4.3 The facility must have documented daily pre-operational inspection procedures to ensure proper sanitary conditions prior to beginning production.

5.4.4 The SSOPs should be administered by a member of the Management staff who has been trained in the principles of HACCP and Food Plant Sanitation.

5.4.5 The facility must maintain a list of all cleaning and sanitizing chemicals used in the facility. All cleaning materials, sanitizers and other chemicals must be identified, held and stored in a manner that protects against contamination of food, food-contact surfaces and food-packaging materials.

5.4.6 All chemicals must be approved for use in a food processing facility and must be held and applied in accordance with any and all Federal, State and local government regulations. Where applicable, verification and documentation procedures are maintained with periodic testing to ensure concentration levels are consistent with product labeling.

5.4.7 Sanitation employees should receive documented training prior to performing their duties, and any employees using chemicals should be trained in advance on the safe and intended use of those chemicals. Documented refresher training should be performed at least annually or as needed if chemicals change.

5.5 Additional elements of the GMP Program should include consideration of plant/grounds, facility design, equipment/utensils and processes/controls as outlined in the CFR Title 21.

SECTION 6: Pest Control

Description: An Integrated Pest Management program must be in place at all manufacturing and distribution facilities to ensure a sanitary and pest-free environment.

Requirements: =

- 6.1 The facility must maintain a documented integrated pest management program. The program must include:
 - 6.1.1 Current proof of licensing for pesticide application
 - 6.1.2 Written procedures for application and inspection.
 - 6.1.3 A listing of all chemicals used along with accompanying material safety data sheets.
 - 6.1.4 A current schematic of plant layout, indicating locations of numbered traps and other pest control devices.
 - 6.1.5 Storage locations of pesticides separated and controlled from the production environment.
- 6.2 If contracted, facility must be able to present a copy of the firm's proof of insurance coverage and the signed contract itself, stipulating frequency of applications and inspections. Actual inspection results from the past twelve months must be readily available for inspection by Brinker Quality Assurance or an assigned third party designee.
- 6.3 The pest control operator must evaluate the premises during each application for potential problem areas that may exist, and these should be brought to the attention of management for corrective action.

SECTION 7 – Foreign Material Control & Detection

Description: Foreign material in food product is a food safety hazard which can lead to customer complaints and possible injury. Foreign Material Control is required in the prevention of adulterated products.

Requirements: =

- 7.1 The design, construction, and use of equipment and utensils must preclude the adulteration of food with lubricants, fuel, metal fragments, or any other contaminant.
- 7.2 Procedures and/or devices must be in place for foreign material control. Corrective action must be taken if a metal detector or other foreign material detection device is found to be non-operational. In addition, there must be effective and documented procedures for the prevention of contamination from breakage of glass and hard plastics.
- 7.3 Brinker Quality Assurance reserves the right to approve or disapprove the metal detection policy and program to ensure final product safety.

7.4 Program Criteria to Include:

- 7.4.1 The facility must have a program/process to control foreign material such as metal detectors, x-ray, screens and/or magnets to prevent the occurrence of foreign material in the finished product. The system must be equipped to remove, isolate, or eject the suspected contaminated product.
- 7.4.2 There must be written procedures for the use of each of these foreign material control systems, which include frequency of checks and procedures to follow if foreign material contamination is found or in the event that detection equipment becomes non-functional.
- 7.4.3 Written procedures for use of metal detectors must be implemented to require metal detection tests to be performed and documented at least hourly. Metal detectors must be equipped to detect ferrous, non-ferrous and stainless steel of a size that is appropriate to the product type and risk. Upon testing, the required metal detection standards must be rejected three consecutive times to verify metal detector accuracy.
- 7.4.4 If the metal detection rejection system fails, all products manufactured back to the last successful check must be held and rechecked. Upon rechecking, if contamination is detected, the product must be evaluated to determine the source of the contamination and then discarded. An investigation must then take place to determine the cause of the contamination, with documented corrective actions for preventing a reoccurrence. Refer to the Foreign Material Contamination Investigation Survey Form located in the Appendix.

SECTION 8 – Food Security

Description: Food security is essential in all domestic and international food processing and storage facilities to protect the product from being compromised by external parties. A Food Security program must be established at all food manufacturing and distribution locations with an assigned person to manage program compliance.

Requirements: =

- 8.1 The facility must have a written and implemented Food Security program based upon the FDA/CFSSAN – Guidance for Industry: Food Producers, Processors, and Transporters: Food Security Preventive Measures Guidance and/or the FSIS Model Food Security Plan for Meat and Poultry Processing Facilities.
- 8.2 The facility management must utilize both internal and external resources to identify, organize, communicate and implement a documented product security program that is fully understood by plant employees, suppliers, customers, and regulatory agencies.
- 8.3 The food security program must include:
 - 8.3.1 Food Security Team to annually assess the program effectiveness based upon a risk assessment.
 - 8.3.2 Personnel control and background checks.

- 8.3.3 Security of plant, grounds, and outside bulk storage to ensure only authorized individuals are allowed into the facility.

SECTION 9 – Allergen Control

Description: Inadvertent introduction of allergens into food products is a food safety hazard that can lead to serious injury and possible death for some consumers. An Allergen Control program is important in reducing the potential risk to those consumers with allergies to those foods listed by the FDA as The Big Eight: milk and dairy products, eggs, peanuts, soy, tree nuts, wheat, shellfish (including crustaceans) and fish. In addition to the Big Eight allergens, MSG is also prohibited in all Brinker International products.

Requirements: =

- 9.1 The supplier must have a written program designed to address the control of allergens throughout the operation and production of food products intended for distribution to Brinker owned or franchised restaurants. The program must incorporate procedures that minimize the possibility of cross-contact of allergens into products which are intended to be free of those components. Written Allergen Control programs should include elements of the following:
- 9.1.1 Product R&D / Engineering and System Design – The facility must maintain a listing of all ingredients used in the operation, with special consideration given to those ingredients containing allergens. Consideration should be given to the allergenic nature of ingredients and the product production flow to minimize allergen cross-contamination risk. Brinker International reserves the right during product development to determine which allergens are acceptable within the product type to prevent the inclusion of ‘hidden’ allergens in the finished product. A ‘hidden’ allergen is any allergenic ingredient that is not inherent to the product that would not be recognized by the average consumer.
- 9.1.2 Raw Material and Ingredient Purchasing, Transportation & Storage – Ensure that Suppliers of raw materials have an implemented and documented allergen control plan, including the proper sanitation or dedicated use in the transportation of bulk ingredients or shipping containers that are re-used. Ensure proper handling and storage of raw materials to minimize cross-contact between allergenic and non-allergenic ingredients.
- 9.1.3 Production and Processing
- Scheduling - Written procedures for production scheduling of products containing allergens, including documented procedures for production sequencing, raw material handling and rework.
 - Product Labeling – Documented program and process for the clear labeling of products with allergens.
 - Sanitation Standard Operating Procedures (SSOPs) should include steps for adequate cleaning and sanitizing of equipment used in contact with allergens.



- Documented compliance and verification by Quality Assurance, proving the program is effective at controlling allergens.
- 9.1.4 Allergen control may be either part of the total HACCP program or may be maintained separately based on the results of the hazard analysis.
- 9.1.5 Training should be provided to ensure all employees have an understanding of food allergies and allergen prevention procedures. Employees should be able to demonstrate a working knowledge of the program as it pertains to their work area.

SECTION 10 – Traceability/Recall & Code Dating Requirements

Description: A Traceability/Recall program is required to ensure product identification in the event of a product recall/withdrawal. **Notify Brinker immediately in the event of a product recall/withdrawal.**

Brinker 24 hour Crisis Number: U.S. 800-807-6612

Requirements: =

10.1 Ingredient/Packaging Traceability:

- 10.1.1 The supplier must develop and maintain a written procedure for tracing all raw materials received by lot code through each phase of processing to final disposition. Traced product/materials shall be accounted for by:
- Lot number
 - Amount produced
 - Amount of waste
 - Location of material
 - Date produced
 - Date shipped to restaurants or distribution centers/warehouses
- 10.1.2 The supplier must be able to demonstrate traceability for a given ingredient from receipt to finished product and the results provided to Brinker Quality Assurance upon request.
- 10.1.3 All exterior and interior packaging shall be code dated per the format noted below to ensure traceability.
- 10.1.4 When to utilize USE BY or MFG Date on the shipping containers.
- 10.1.4.1 All perishable (refrigerated) products must include the term ‘**USE BY**’ along with the date on the shipping case and internal package if applicable.
- 10.1.4.2 Non-perishable and frozen products must include the term ‘**MFG DATE**’ (date of manufacture) along with the date on the shipping case and internal package if applicable.
- 10.1.4.3 The terminology “Best,” “Best By” or “Sell By” are not acceptable terms for use on Brinker products.

10.1.4.4 Use the appropriate storage condition statement based upon the proper shipping and storage method; Keep Refrigerated, Keep Frozen or Shelf Stable.

10.1.5 The supplier must use the following code date format noting that the words “USE BY” or “MFG DATE” should precede the abbreviation of the month, day of the month (two digits), and the last two digits of the year:

- Date Code information on the outer case must be in Arial, Helvetica or other Standard True-Type font with a 36 pt font size. Inner package code dating must be in the same standard font with a minimum 14 pt font size and be easily legible.
- Frozen/Dry: Date of Manufacture (e.g. MFG DATE: JAN-01-09)
- Refrigerated: Use by date (e.g. USE BY: JAN-01-09)
- Perishable (Generally with 6 mos. or less shelf life): Use by date (e.g. USE BY: JAN -01-09)
- Additionally, an increment designation (by shift, hour, minute, etc.) is recommended to be part of the code dating format.

10.1.6 For the month the following standard abbreviations should be utilized:

January	JAN	July	JLY
February	FEB	August	AUG
March	MRC	September	SEP
April	APR	October	OCT
May	MAY	November	NOV
June	JNE	December	DEC

**Please note that the abbreviations for March, June and July are MRC, JNE and JLY, respectively, to avoid confusion with other months.

10.2 Distribution of Product from Supplier:

10.2.1 Facility must maintain records of product destination, by lot code and case count, of all product shipped to Brinker approved distribution centers.

10.3 Product Withdrawal:

10.3.1 The supplier must maintain a written recall program for removal of substandard product or product which represents a food safety hazard from distribution channels. These items include but are not limited to: rework, work-in-process (WIP) materials, batch systems, continuous processes, transit product, destroyed product, held product, donated product, product sold through alternate channels, material returned to the supplier, samples, and shared systems.

10.4 The supplier must demonstrate the effectiveness of the recall program by conducting a mock recall procedure at a minimum of once per year. The procedure for mock recall must be written, and the results of the mock recall must be documented. Mock recalls should be completed within 2 hours and should result in 100% recovery. If results fall outside this requirement, the system must be evaluated to determine what steps need to be implemented in order to meet this requirement.

SECTION 11 – Control of Non-Conforming Product

Description: Brinker requires suppliers to have a documented system for the control of non-conforming product. This system must ensure that out-of-spec/non-conforming product does not reach the customer.

Requirements: =

- 11.1 Suppliers must develop, implement, and maintain documented procedures and instructions to ensure non-conforming product cannot be inadvertently used or shipped. Procedures shall include, at a minimum, a means of: identifying non-conforming product; segregating it; preventing inadvertent use, and implementing corrective action(s).
- 11.2 Authorities, responsibilities, and a procedure for review and disposition of non-conforming product shall be clearly defined.
- 11.3 Reworked/screened product shall be re-inspected in accordance with documented procedures prior to release for shipment.
 - 11.3.1 When utilizing rework, supplier must have established breaks in production to minimize exposure and to break the cycle of rework.
- 11.4 Non-conforming product will be relabeled or repackaged so as to remove any references to Brinker International or their brands from the product label and/or packaging prior to donation or sale of any kind.
- 11.5 Documentation must be maintained that logs all non-conforming product including details in regard to corrective actions and disposition information.

SECTION 12 – Third Party Inspections

Description: Brinker International will require the following third party audits (as applicable) in each processing/warehouse facility that manufactures or distributes products for Brinker and to be considered an approved supplier/distributor:

- 1.7.1 Good Manufacturing & Food Safety Practices – (GMP)
Brinker International will accept a Brinker approved audit which meets the requirements set forth by the Global Food Safety Initiative (SQF/BRC)
 - 1.7.2 Animal Welfare – (AW)
 - 1.7.3 Specified Risk Material – (SRM)
 - 1.7.4 Good Agricultural Practices - (GAP)
- Brinker International's approved auditing company will access the effectiveness of the quality systems as outlined in the Appendix.

Requirements: =

- 12.1 New suppliers must provide a comparable, transferable third party audit which meets the criteria outlined in this manual as part of the Brinker Quality Assurance approval program. If business is awarded, all suppliers will be required to have an ongoing, annual Brinker approved audit based upon the expiration date of the current audit. Audits will not be accepted from facilities that are not in production mode. All suppliers will have a



Brinker Approved third party audit based on the expiration date of their current audit. Additionally:

- 12.1.1 Annual GAP audits will be required of all produce growers from a Brinker-approved auditing company.
- 12.1.2 Annual GMP/FS audits will be required of all beef, veal, pork, poultry, produce suppliers, as well as all distribution centers.
- 12.1.3 Biannual AW and SRM audits will be required of all beef and veal suppliers.
- 12.1.4 Biannual AW audits will be required of all pork and poultry suppliers.
- 12.1.5 Refer to the appendix for additional product-specific requirements.

12.2 Audit requirements are as follows:

- 12.2.1 Annual audits at all facilities which provide any product to Brinker restaurants.
- 12.2.2 An overall passing score of at least 90% must be met with a passing score in each section.
- 12.2.3 Corrective actions submitted to Brinker-approved auditing company for all violations identified on the audit.
- 12.2.4 Audit results sent directly from Brinker-approved auditing company to Brinker.
- 12.2.5 If the facility fails to achieve a passing score, a re-audit must be completed within 45 days. Brinker QA may conduct a facility visit to ensure corrective actions have been completed.
- 12.2.6 If a facility fails to achieve a passing score after 2 consecutive audits, Brinker will identify an alternative supplier. The failure may lead up to and include the loss of business and the ability to participate in future business opportunities.
- 12.2.7 If an approved facility fails to have an assessment performed by Brinker-approved auditing company after 30 days from the previous assessment expiration date, the auditor is authorized to perform an unannounced audit at the facility at the supplier/distributor's expense.

SECTION 13 –Specification Requirements & Product Evaluation

Description: Conformance to the written specifications is critical in maintaining the level of product quality and consistency. It is the supplier's responsibility to assure compliance to Brinker specifications at all times. Refer to the appendix and the Brinker specific product specification for additional requirements.

13.1 Specification Requirements: =

- 13.1.1 A Specification Adherence and Control Program must be in place, which controls formulas, critical process procedures, and finished product evaluation, including chemical, physical, and microbiological criteria, and nutritional/labeling facts for all products produced for Brinker restaurants. The following attributes must be included in the program with supporting documentation on file and provided to Brinker Quality Assurance, upon request:
 - Specifications for all incoming raw materials and adherence to the requirements outlined in Purchased Material Control Section 2.2

- Preparation of ingredients prior to processing
- Equipment used in processing
- Precise Processing Procedures or Flowchart of how the product is produced outlining critical control and quality control points which includes the required cook or cooling temperatures, relevant times or measurements for processing steps (i.e. mixing speeds, vacuum pressure, etc)
- The tests performed throughout the process to ensure the finished product quality is met (i.e.: viscosity checks, pH, percent salt, breading/marinade pick-up, portion weight tests, and other key physical attributes deemed necessary to produce a consistent product).
- Finished product microbiological tests must be conducted on finished product performed at the frequency outlined in the specification and Microbiological Testing Section 14.2.
- Statistical Analysis, such as SPC, must be utilized to evaluate and validate process capability and actual outcomes from the manufacturing process. Refer to Process Capabilities and Statistical Analysis Section 15.

13.2 Product Evaluation Requirements:

13.2.1 The manufacturer is required to document confirmation of compliance to all specification requirements during each production run of product and supplied to Brinker on a scheduled frequency or upon request. A verification of performance must be documented on an hourly basis minimum or at the established frequency listed in the specific product specification or as requested.

13.2.2 An organoleptic evaluation program has been established to ensure the finished product meets the required attributes as outlined in the specification. The evaluations must be performed at a frequency that ensures consistency from lot to lot against a control. Raw products should be prepared as served in Brinker restaurants to ensure consistency to our guests.

13.2.3 The manufacturer must have established procedures for the identification, segregation, and disposition of non-conforming finished products. Prior introduction of any non-conforming finished product into distribution channels requires written approval from Brinker Quality Assurance. Refer to Control of Non-Conforming Product Section 11.

13.2.4 Brinker utilizes a Product Evaluation program to evaluate products at scheduled frequencies outlined in the Purchasing Contract which will be conducted at the supplier's expense. Refer to attachment 4 in the appendix for the Product Evaluation Program.

13.3 Nutritional Labeling and Allergen Declarations:

- 13.3.1 A documented Program must exist to ensure that the nutritional content and allergen declarations provided on the supplier's product are accurate per NLEA requirements. The program must include the following:
- 13.3.1.1 Person responsible for the program (name and title)
 - 13.3.1.2 Procedures used to validate nutritional information of raw materials.
 - 13.3.1.3 Procedures used to determine final nutritional labeling information and ingredient declaration of the supplier's finished product, whether that be through lab analysis or through a theoretical calculation using database such as Genesis.
 - 13.3.1.4 Procedures used to ensure Brinker International is notified of any potential changes to Nutritional or Allergen information.
- 13.3.2 Brinker requires that all suppliers complete nutritional information forms for each product they supply to Brinker. All nutritional information must be noted in two formats ("per 100 gram" and "per serving"). Serving sizes are determined by CFR Title 21 101.12. http://www.access.gpo.gov/nara/cfr/waisidx_01/21cfr101_01.html. Contact the appropriate Quality Assurance person at Brinker International for the correct nutritional forms. **NOTE: if the product/specification changes, the forms must be resubmitted to Brinker International.**

SECTION 14 – Microbiological Testing

Description: A microbiological testing program is required in order to monitor the microbiological quality of the facility's environment and the finished product. Depending on the type of product that you are supplying, you may be required to perform environmental and/or finished product testing. Brinker's philosophy for environmental testing programs is that effort should be made in seeking to find areas that harbor spoilage and pathogenic bacteria to significantly reduce or eliminate these organisms from the environment.

Requirements: =

- 14.1 Environmental Testing Program: (All food manufacturing facilities)
- 14.1.1 The facility must implement and maintain an effective program for verification of sanitation on a continuous basis via environmental microbiological monitoring for indicator organisms.
 - 14.1.2 The environmental program must include product contact and non-contact surfaces (product proximity and floors). As part of the program, after swabbing a food contact surface for a pathogen, sanitizing the swabbed area is strongly recommended.
 - 14.1.3 For ready-to-eat products, environmental monitoring of indicator organisms (non-pathogenic) should be performed during periods of production as well as pre-operationally.
 - 14.1.4 Documentation must exist that outlines the entire program including all of the following:
 - Areas to be tested (product contact and non-product contact surfaces)

- Frequency of testing (no less than once per month or as required on the Brinker Product Specification).
- Type of Testing/Methodology (Listeria spp. at a minimum or as required on the Brinker Product Specification)
- Critical Limits/Action Steps as required on the Brinker Product Specification.
- Person managing and maintaining the program

14.1.5 Documented results should be on file for the last 1 year.

14.2 Finished Product Testing Program

14.2.1 Potentially Hazardous Foods (PHF) /Temperature Control For Safety Foods (TCS): All facilities providing product to Brinker that are considered PHF/TCS Foods must have a finished product microbiological sampling program which samples organisms and pathogens that are listed on the Brinker Product Specification for the specific product types. Product undergoing finished sample microbiological testing must not be shipped without verification that microbiological counts of the product are found to be within specification requirements. Brinker will determine PHF/TCS status by utilizing the FDA Food Code, laboratory testing such as pH, water activity, inoculation studies, and final use in the restaurant.

14.2.2 Non-Potentially Hazardous Foods (PHF) /Non-Temperature Control For Safety Foods (TCS): All facilities providing product to Brinker that are not considered PHFs/TCS Foods, as validated by Brinker Quality Assurance, must have a finished product microbiological sampling program which samples organisms that are listed on the Brinker Product Specification for the specific product types.

14.2.3 Documentation must exist that outlines the entire program including all of the following:

- Frequency of testing (at a minimum a composite sample for the production run that includes all individual batches made during the production run or as required on the Brinker Product Specification)
- Type of Testing/Methodology as required on the Brinker Product Specification
- Critical Limits/Action Steps as required on the Brinker Product Specification
- Person managing and maintaining the program

14.2.4 Documented results should be on file for the last 1 year.

14.2.5 Suppliers conducting in-house microbiological analysis for pathogens must adhere to the following requirements:

- Separate physical location for testing whenever feasible.
- Separate air supply and filtration for laboratory areas.
- Refer to Quality Systems Management, Section 1.8 for additional laboratory requirements.

SECTION 15 – Process Capabilities & Statistical Analysis

Description: Validation that the production process is capable of meeting the defined specification parameters must occur frequently. In some applications statistical process control and tools should be considered. This section requires suppliers to conduct process capability studies and other statistical analysis techniques to ensure compliance to specifications.

Requirements: =

- 15.1 As required by Brinker, the supplier must be able to provide statistical information demonstrating the capability to comply with the specification parameters.
 - 15.1.1 Documentation should include the following when applicable:
 - Histogram representation of the process parameters including general statistical information such as mean, standard deviation, specification limits, etc.
 - Capability indicators such as Cpk or Ppk to measure capability
 - Projected specification compliance based on process measurements
 - Other statistical indicators or techniques where applicable.
 - The supplier should conduct internal studies on a frequent basis to validate capabilities. Documentation of those studies should be made available as required.

SECTION 16 – Product Storage and Logistics

Description: Suppliers, distributors, and freight forwarders must have established policies and procedures in place to ensure that products are handled, stored and transported in a timely, safe, and secure manner and can be effectively traced. Mandatory requirements are outlined below for manufacturers and freight forwarders. For all Quality Assurance and Food Safety guidance pertaining to distribution facilities please refer to the Brinker International Distributor Requirements with special consideration to Section D – Deliveries, Section H – Security Issues, and Section I - Inspections.

Requirements: =

- 16.1 Systems must be in place for managing and controlling the prevention of product deterioration and spoilage through appropriate measures that include maintaining required temperatures, humidity, and /or other controls. The following serve as temperature definitions for products during transport, delivery and storage.

Frozen Products:

Stored	<u>0° F (-18° C) +/- 10° F (+/-12° C)</u>
Delivered	+10° F (-12° C)
Ice Cream (at all times)	-20° F

Refrigerated Product:

At all times	33 - 41° F (1 - 5° C)
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Ambient (All products not specified as Frozen or Refrigerated):



Stored 65 - 85° F (18 - 30°C)

Note: Under unavoidable climatic extremes, ambient temperatures in dry storage may rise to 95 °F (35° C) but must not remain there for more than a 15 day period.

16.2 Temperature Monitoring/Tracking:

- 16.2.1 The storage warehouse must follow good manufacturing and storage practices to ensure product remains at the required temperatures and in wholesome condition. The warehouse or freight forwarder must comply with the guidance set forth within this document in Section 5 – Good Manufacturing Practices for requirements applicable to storage and warehousing.
- 16.2.2 To certify that proper temperatures of products are maintained during transport, temperatures of each pallet of product and the truck refrigeration unit setting must be taken and documented on the bill of lading.
- 16.2.3 If excessive temperature discrepancies are observed upon delivery at the distribution centers, Brinker will require temperature recording devices on future loads. Recording device data must be downloaded and the results of temperature tracking sent to Brinker QA upon request.

16.3 Carrier Requirements:

- 16.3.1 All vehicles used to distribute product must be examined for the ability to maintain temperature and for cleanliness, inside and outside, before the product is loaded. Results must be documented and maintained on or with the bill of lading.
- 16.3.2 Substandard equipment may not be used.
- 16.3.3 Any vehicle utilized to haul solid waste (other than the return of cardboard in the trailer racks) or toxic material must not be used to transport food products. No chemicals or non-food grade items shall be transported with food products.
- 16.3.4 Trucks must be loaded in a manner to prevent and avoid cross-contamination, and in accordance with good storage and distribution practices. Product cases must be handled and stored to ensure the cases remain clean and undamaged.
- 16.3.5 Trucks may not leave the shipping point until the order is completely checked to verify wholesome condition, product identification, product count and temperatures. The bill of lading must be signed by the shipping point designee and the carrier. This documentation must be provided to Brinker QA upon request.

16.4 Security Requirements:

- 16.4.1 Distributor and/or the freight consolidators must comply with the guidance set forth within this document in Section 8 - Food Security and under the Distribution Requirements Section H – Security Issues for Foodservice Distributors.

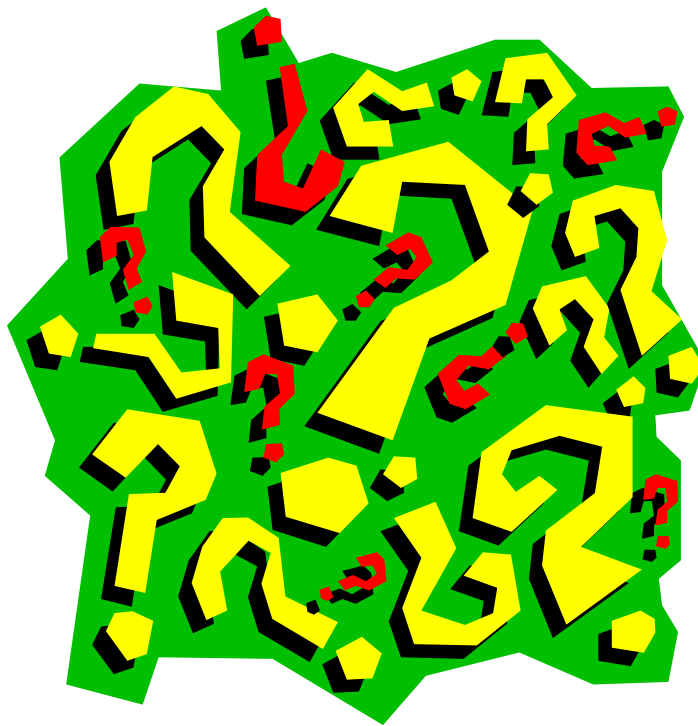
16.5 Third Party Inspections:

- 16.5.1 All storage warehouses must comply with the guidance set forth within this document in Section 12 - Third Party Inspections and under the Distribution Requirements Section I - Inspections.

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Frequently Asked Questions

This section can be used to address common questions regarding the Supplier Quality Systems Program.



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Frequently Asked Questions :

1. What if we move the product to a different plant or need to change manufacturing procedures? Do we need to notify Brinker?

Yes; Brinker must be informed of all manufacturing changes that could affect the quality outcome of the finished product and/or a relocation of the product to a different manufacturing location. Product will need to be produced using the new process and/or at the new location and culinary must approve the product prior to any product going into distribution.

2. Am I responsible for the cost of the Product Evaluations and Third Party Inspections?

Yes; all fees associated with product evaluations and third party sanitation/GMP inspections are the responsibility of the supplier. This is outlined in the Supplier Agreement.

3. Is ATP based sanitation monitoring enough to satisfy the microbiological environmental testing requirements?

ATP is best used as a indicator tool for the sanitation personnel to validate the cleanliness of the area. Brinker requires a microbiological testing program. Microbiological swabs should be taken prior to start up and for RTE/TCS products swabbing should be performed during production. Please refer to the Brinker Microbiological Testing Matrix (Attachment 5) for the organisms that need to be tested based upon the product that is manufactured.

4. Can you give me an example of minimum finished product testing requirements?

- On a batch run product, no less than three samples must be pulled, beginning, middle and end. All individual batch samples can be put together to perform one composite test per production batch, but it is recommended that testing is performed on each individual batch.
- If a continuous run product, samples must be pulled hourly and can be composited every 4 hours.
- All individual product samples must be retained when compositing.

5. How do I report nutritional information on the specification? Per Serving or Per 100 grams.

Both- in Per 100 gram and per the recommended serving size based upon the CFR. (Reference 21 CFR 101.12). Contact your QA representative for the complete instructions on submitting nutritional information to Brinker.

If you didn't see the answer to your question here, please contact your Brinker Quality Assurance representative or email to the Quality Assurance Supplier mailbox at Brinker. (QualityAssuranceSupplier@Brinker.com)

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Appendix / Tools

This section contains reference materials, procedures, and samples of some of the forms that are required in the Supplier Quality Systems Program.



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Attachment 1

Summary of Supplier Quality System Standards		
SQS Section #	Section Name	Reviewing Group
1	Quality Systems Management	Silliker
2	Purchased Material Control	Silliker
3	Documentation	Silliker
4	HACCP	Silliker
5	GMPs	Silliker
6	Pest Control	Silliker
7	Foreign Material Control & Detection	Silliker
8	Food Security	Silliker
9	Allergen Control	Silliker
10	Traceability/Recall	Silliker
11	Control of Non-Conforming Product	Silliker
12	Third Party Inspections	Brinker QA
13	Specification Requirements & Product Evaluation	Brinker/Analytical Food Labs
14	Microbiological Testing	Silliker/Brinker
15	Process Capabilities & Statistical Analysis	Brinker
16	Product Storage & Logistics	Silliker/Brinker



Attachment 2

Incident Number: _____

FOREIGN MATERIAL CONTAMINATION ANALYSIS

1. Date and time incident was discovered: _____
2. Name of employee discovering the situation: _____
3. Name of on-duty supervisor: _____
4. Who (local personnel) was notified? _____
When (Date and Time)? _____
Instruction Received: _____

5. Was corporate headquarters contacted? Yes _____ No _____ If so, who was contacted when and at what time? _____
Instruction received: _____
6. If product is produced for a customer, was customer notified? Yes _____ No _____
Who was notified? _____ Date & Time: _____
Instruction received: _____
7. Did you shut down the line? Yes _____ No _____ If so, when; or if not, why not?

8. Type of foreign material found (size, shape, magnetism, etc.) (SAVE ALL FOREIGN MATERIAL): _____

9. Where was the foreign material found (product, lines, orientation, etc.)? _____

10. What is the source of contamination (bag/bulk ingredient, pkg. material, specific equipment, reefed, etc.)? _____

11. If ingredient: Lot #: _____ Supplier: _____
Quantity received: _____ Quantity Used: _____



12. Amount of product placed on hold: Hold Number: _____
Bulk/In-process: _____ Ingredient: _____
Finished Cases: _____ Lot Number: _____

13. How much of a safety margin is represented? _____

14. Was product shipped to other locations? Yes _____ No _____
(If "Yes", attach a detailed report as to each location with respective quantities).

15. Types of product protection devices (i.e. sifters, magnets, metal detectors, etc.),
Frequency checked and dates and times devices were last checked for functionality:

16. Further information that will help in the investigation: _____

17. General Discussion and comments: _____

18. Corrective/Suggested Action to prevent repeat of similar situation: _____

19. Product disposition and reason for this decision: _____

Analysis prepared by:

Name: _____ Title: _____

Date: _____

Record an incident number for each foreign material incident (e.g. 0001, 0002, 0003, etc.). Keep on file for at least three months after expiration of product shelf life.



Attachment 3

Product Specific Requirements: Ground Beef

To be an approved supplier of Brinker International's ground beef hamburgers the specification, the Quality Programs and the following requirements must be adhered to and followed.

The criteria for the production of the ground beef patties are outlined in the specification, however the following points along with clarification are stated below to reiterate their importance. Brinker Quality Assurance will audit the manufacturing facilities on a yearly basis, and as needed to ensure compliance to these standards.

Production Requirements:

1. Product shall be produced on a segregated processing system, clean-up to clean-up (from course grinder through to packaging) on a segregated line. No other products can be produced before and/or after the production of Brinker product unless a full wash down (USDA recognized) has occurred.
2. All beef trimming lots used in Brinker production must be segregated to Brinker only product, either fresh or frozen. If frozen domestic 90's are used to ensure the lean to fat ratio is met; the lot must be released as negative to 0157:H7 along with being segregated and completely used in Brinker product.
3. To ensure fat to lean ratio meets the specification requirements per batch an Anyl-Ray is acceptable for on-line use, however the accuracy must be confirmed daily using an Infratec Fat Analyzer (or equivalent). Results must be sent to Brinker QA on a routine basis and/or upon request.

Microbiological Testing Requirements:

1. All incoming fresh trim, regardless of finished product use or customer, must be tested for E. coli 0157:H7. No untested USDA and/or Ag Canada raw materials are allowed in the manufacturing facility. Brinker Quality Assurance must approve deviations to this standard.
2. Every combo bin of fresh beef trimmings used must be sampled/tested for E. coli O157:H7 according to Brinker quality assurance approved protocols by the approved packing plant. Test results must be sent to the grinder prior to the shipment being received at the plant. E. coli 0157:H7 test results must be received for the product prior to the trimmings entering into the facility.
3. Supplier will document and match up bins into the batch in which they were used. This will identify that all batches of beef trimmings have been tested for E. coli O157:H7. Certificates of analysis along with documents matching lotted bins to batches must be sent to Brinker QA by request.
4. Microbiological results from finished product testing must be sent to Brinker quality assurance showing finished patty results and negative trim results. Information must show traceability of raw beef trimmings to finished product. Information must be provided to Brinker quality assurance on a routine scheduled basis.



Prohibited Materials

No variety meats, SRM's or CNS, including but not limited to: liver, tongue, sweetbread, heart, kidney, brain, spinal cord or central nervous system materials, tripe, heat meat, esophagus, tail or straight added fat are allowed. No mechanically boned beef, AMR, advanced lean recovered beef, partially defatted beef, partially defatted beef fatty tissue or lean finely textured beef are allowed.

Age Requirements:

Product must not be more than 5 days from fabrication at the time of grinding. Brinker Quality Assurance must approve any deviation to this standard.

Product Age Flow:

To ensure that the packer, grinder and distribution center work together to delivery a quality product to the restaurants, the following timeline must be followed:

- Packer: 5 days from fabrication to deliver product to the grinder.
- Grinder: 7 days to deliver finished product to the distribution centers.
- Distribution: 7 days to rotate product through the center to the restaurants.
- Restaurant: 6 days to use product within the 20 day shelf life.

Brinker Quality Assurance must approve any deviation to the stated timeline.



Attachment 4 Product Assessment Program

Brinker utilizes third party laboratory services to evaluate products on a regular basis of the measurable attributes of the product specification to ensure expectations are clearly defined and achieved.

The details of the program are as follows:

1. Each product will be evaluated on a quarterly, semi-annually, or annual basis. Please refer to the contract which shows how many times per year the product will be evaluated.
2. Three cases of each product will be evaluated for specification compliance. These cases may involve multiple distribution centers and multiple date codes. By auditing three cases at a time, it simplifies the process by:
 - a. Providing an increased sample size for the product code.
 - b. Eliminating the need to acquire another case of product if specification requirements are not met.
 - c. Eliminating the reevaluation time, which allows a resolution to be given in a timely manner.
3. Overall, if product from the three-case sample does not meet the Brinker specification requirements, the supplier will have 5 business days to respond with the following options:
 - a. Submit the supplier Quality Assurance data on the production run to supplieraudits@brinker.com, and
 - b. Submit, in writing, the justification as to why the product did not meet the agreed upon specification parameters to supplieraudits@brinker.com, or
 - c. Show the out of specification compliance data is not to the degree of noncompliance as indicated in the lab results.
4. The evaluation results will be sent to the Brinker Brand and the Brinker Purchasing departments to determine and agree upon the disposition of the out-of-specification product. Brinker may use any of the following options to ensure specification compliance:
 - a. Place product code date on hold; supplier will be responsible to pick up product and replace within a reasonable and agreed upon timeframe (based upon product) without shorting the restaurants.
 - b. Use the product and request credit for the percent of product that is out of specification compliance for that production code. Data submitted by the supplier can be used in conjunction with the lab results to determine percent out of compliance.
 - c. Use the product and revise the specification.
 - d. Request additional third party product review from different code dates to determine if the non-compliance is a one-time occurrence or a systemic issue with the supplier's ability to meet the specification parameters.



5. If product does not meet Brinker specification requirements on two consecutive evaluations and the product's measurable attributes are deemed obtainable, the product evaluations may be increased, at the supplier's expense, to a monthly frequency until which time the product results are acceptable.
6. If product meets the specification parameters on three consecutive evaluations and no restaurant or culinary hotlines are received for product that does not meet specification requirements, Brinker may reduce the number of cases being evaluated or may reduce the frequency of the product assessments.
7. Supplier is responsible for the payment of all costs associated with Product inspection and laboratory fees. Such payment is to be made directly to Brinker's authorized third party laboratory.