

## FOOD SAFETY MODERNIZATION ACT

### SANITARY OPERATING PROCEDURES

#### Temperature Offerings

As a less-than-truckload operation, irrespective of the stated temperature requirement on the Bill of Lading or load tender, Carrier only has liability for and responsibility to offer and maintain one of the following air temperature ranges:

1. **Frozen:** Air temperature set point -10°F providing an air temperature range of -10 to 31°F while in transit

2. **Cooler:** Air temperature set point 33°F providing an air temperature range of 33 to 38°F while in transit

Specifically, when Shipper tenders Bill of Lading requesting a specific storage temperature to be maintained, Carrier will only be liable and responsible for maintaining temperatures as defined above. Any shipment tendered with a temperature requirement greater than 38°F will be carried and maintained in the Cooler temperature range. All refrigeration units will be set to Start/Stop control mode.

#### Trailer Security

Carrier is responsible for, and expected to use, padlocks on all loads. Trailers on a point-to-point linehaul run will be secured with both a padlock and seal. The seal number will be checked to the seal receipt on arrival at the destination Service Center. Trailers on pick-up and delivery runs will be secured with a heavy duty padlock that should be in place prior to arrival at the pick-up or consignee location. Side doors (if present) and rear doors must be padlocked between drops on all LTL Manifests. Upon completion of daily deliveries, the driver is required to padlock rear and side doors of trailer. GPS devices allow for real-time tracking of trailer location.

#### Trailer Hygiene

Trailers shall be constructed of smooth, impervious materials that will allow adequate cleaning. They will be equipped with refrigeration units designed to provide adequate temperature control. Trailers will be maintained and stored in a manner to prevent pest infestation, or becoming contaminated that could compromise food safety. Trailers will never be used to haul hazardous, toxic, or noxious substances, or products that are not compatible with food safety. Trailers will be swept out after every load and washed when inspection deems necessary to prevent food products from becoming unsafe. Trailer washouts are documented on a centralized database.

#### Temperature Monitoring Systems

All trailers are equipped with telematic devices capable of downloads documenting reefer settings and transit operation temperatures. All FFE Service Centers are outfitted with wireless temperature recording apparatus set to alert management if warehouse temperatures deviate from preset limits.

#### General Transportation Operations

All trailers will be precooled prior to loading to comply with the temperature offerings set out above. Dual temperature trailers will have the two compartments separated by an insulated bulkhead. Freight will be secured with load-locks when considered necessary by the loader to prevent damage to food products. In the event of a material failure of temperature control or other condition that could render food product unsafe, FFE will take measures to ensure that the affected product will not enter commerce until it has been deemed safe.

#### Training

Training will be provided on FFE sanitary transportation practices and the responsibilities of the carrier. Training records will include date, type of training, and name of the persons trained, and will be stored for a period of one year beyond when the named personnel no longer perform that duty.