	Document Name:	VENDOR PRODUCT RECALL AND WITHDRAWAL POLICY and PROCEDURES		
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	Created:	6/16/2006	Owner: Gordon Food Service North American Food Safety and Quality Assurance Team	
	Revised:	10/9/2025		
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PURPOSE: To communicate Gordon Food Service (GFS) requirements to vendors and customers regarding the initiation and management of product recalls and withdrawals for products distributed by Gordon Food Service U.S. or sold at Gordon Food Service Stores.

SCOPE: This document applies to all vendors, co-packers and raw material vendors of products distributed by Gordon Food Service U.S. and Gordon Food Service Stores.

REFERENCES:

- 1) Code of Federal Regulations CFR Title 21 Food & Drugs, Part 6
- 2) Establishment and Maintenance of Records Under the Public Health Security and Maintenance of Records Under the Public Health Security and Bioterrorism Preparedness and Response Act of 2002
- 3) FDA Reportable Food Registry
- 4) FDA Food Safety Modernization Act
- 5) Gordon Food Service Purchase Order Terms and Conditions

RESPONSIBILITIES:

Vendors (including co-packers and raw material vendors) must have comprehensive and tested traceability capability and recall and withdrawal plans to ensure their ability to respond appropriately to protect GFS customers, the consuming public and our shared business interests. It is essential that vendors are prepared for timely implementation of any product recall or withdrawal.

Should the need arise, vendors are expected to promptly provide Gordon Food Service Quality Assurance with appropriate complete written information and instructions as detailed on the GFS Notification Form required for us to initiate a timely and well-executed recall. The GFS Notification Form can be obtained from Gordon Supplier Plus, or a member of the GFS Food Safety Quality Assurance upon request. Vendors shall perform periodic mock recall exercises with their systems and procedures to ensure their recall system and actions comply with all regulatory expectations and confirm the effectiveness and readiness for a real exercise.

Definitions:

Recall: a food safety or regulatory compliance issue. GFS Action: 1) quarantine of affected inventory and 2) GFS customer notification
****Provide GFS with the FDA Reportable Food Registry file number for Class I FDA recalls (not applicable to USDA-regulated products)**

Withdrawal/Hold : a quality issue (not food safety) that you wish to have us stop shipment from our distribution centers and HOLD or Return to Vendor. GFS Action: 1) quarantine of affected inventory and 2) Supplier directed hold, return of inventory to vendor, or GFS destruction. Not applicable to Gordon Food Service Stores unless specifically requested. ****no customer notification**


Inventory Check: a potential quality issue (not food safety) and request for information or investigation that may result in a subsequent Withdrawal. Not applicable to Gordon Food Service Stores. ****no customer notification**

Items Drop Shipped from vendor: Per the Bioterrorism Act of 2002, persons who manufacture, process, pack, distribute, receive, hold, or import food in the United States must establish and maintain records to identify and communicate to the immediate previous sources (your vendor) and immediate subsequent recipients (GFS customer) for all food they receive and release. Gordon Food Service's expectations for items that are drop shipped from a GFS vendor to a GFS customer is that the vendor is able to identify and communicate to any of those customers affected by the recall. In addition to notifying the customer, the vendor is to provide the GFS recall coordinator with a list of all GFS customers that received the product.

GFS Food Safety Quality Assurance: Upon receipt of the information specified below, the designated GFS Recall Coordinator will initiate all Gordon Food Service aspects of the recall, including where appropriate, GFS Distribution Center and potentially affected customer notifications.

PROCESS STEPS:

I. (RECALLS AND WITHDRAWALS) GFS CONTACTS: recallcoordinators@gfs.com is the only contact that should be sent a recall or withdrawal. Vendors (and/or authorized chain customer representative) are responsible to notify GFS Food Safety Quality Assurance IMMEDIATELY once the recall or withdrawal action has been determined. These individuals from our Grand Rapids Food Safety Quality Assurance team will coordinate subsequent recall activities for ALL GFS U.S. distribution centers, GFS Stores and notify potentially affected customers. (Calls directly to our buyers or our distribution centers will unnecessarily delay the recall or withdrawal process.)

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FOOD SAFETY RECALLS	
On-Call Recall Coordinator	Email: recallcoordinators@gfs.com

QUALITY WITHDRAWALS and HOLDS	
Quality Assurance Mailbox	Email: quality_assurance@gfs.com

II. (RECALLS AND WITHDRAWALS) TRACEABILITY INFORMATION:

Within 2 hours of determination of a recall or withdrawal, vendors are responsible to provide a completed GFS Notification Form to a GFS FSQA contact regarding the affected product(s). It is especially critical that the vendor provides GFS Purchase Order numbers to the FSQA team, as GFS PO is our critical tracking element for recall traceability. For recalls, the form must include the Reportable Food Registry file number for the recall, if the recalled product is FDA-regulated food and the recall is categorized as Class I.

With this information, the designated GFS Recall Coordinator will immediately notify the affected GFS Distribution Centers and GFS Stores to identify and quarantine all potentially affected inventory.

Important: Vendor traceability information related to GFS deliveries is considered confidential and is not to be shared with anyone besides GFS or as requested by a regulatory agency.

III. (RECALLS ONLY) CUSTOMER-LEVEL WRITTEN NOTIFICATION DOCUMENT (and MEDIA RELEASE)

For customer-level food safety recalls, The GFS Recall Coordinator will be drafting a GFS-customer letter that provides GFS-specific details such as GFS item code, disposition instruction, and directions for case credit. We may ask the vendor to review and confirm the accuracy of this GFS customer letter. Additionally, the vendor shall provide a name and phone number for the person or department at their company who will be able to answer customer/consumer questions regarding the recall.

If the recall involves retail sales of the affected product(s), the vendor should work with the appropriate regulatory agency (FDA, USDA) to draft a **media release**, if applicable. **Important: Media releases involving a Gordon Food Service Brand or Gordon Food Service's name must be reviewed by the designated GFS Recall Coordinator prior to the vendor's release to media outlets and regulatory agencies.**

IV. (RECALLS AND WITHDRAWALS) WRITTEN PRODUCT REPLACEMENT PLAN


In the event of a recall or withdrawal, in order to reduce the risk of product shortages or outages for GFS customers, Gordon Food Service may request the vendor company to submit a written action plan for product replacement to GFS Supply Chain. This written plan should ensure safe, wholesome product which is not involved or at risk of involvement in the recall or withdrawal is made available from a GFS approved source to replenish products affected by the recall or withdrawal and include timelines for delivery to each affected Distribution Center.

V. (RECALLS AND WITHDRAWALS) SUPPLIER PROCESS CONTINUOUS IMPROVEMENT

Following a recall or withdrawal, as directed by the GFS Food Safety and Quality Assurance team, the vendor may be required to initiate a thorough investigation of their process' and programs as necessary and perform a thorough root cause analysis. The GFS Food Safety and Quality Assurance team supports external investigation forms and documents, however the Supplier Compliance Specialist at GFS can supply a 5-why form to help support vendors in their investigation upon request. At a minimum, the investigation should include clear definition of the problem, interim containment, root cause analysis, a corrective action plan, verification of the effectiveness of the plan, and steps to prevent other future and like products from similar occurrences.

VI. (RECALLS AND WITHDRAWALS) COST RECOVERY

The vendor will be responsible to reimburse GFS for all GFS costs associated with the recall or withdrawals including, but not limited to time, communication costs, materials, and customer credits. Please contact the FSQA team for our most current administrative billback costs. The table below summarizes many of the costs associated with a recall for Gordon Food Service.

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Gordon Food Service's Recall Billback Breakdown		
Billback title	Description	USD Cost
Project Administration Fee, invoiced as 'Distribution Center Administration Fee'	Review and analysis of recall details, confirm receipt of affected product at distribution center or GFS Stores, report affected status, put products on hold as needed, identify and report product transfers, research and generate list of affected customers, respond to effectiveness checks, perform recordkeeping, cost recovery reporting, etc. Business Units include all GFS Distribution Centers, GFS Store BU, GFS Store customer BU, Drop Ship BU etc.	\$750/Business Unit (may affect multiple BUs, depending on scope of recall)
Customer Notification Setup Fee	Drafting of communications content for voice, web, email, text messaging, and postal mail distribution, coordination and tabulation of submitted affected customer lists, scheduling and initiation of customer communications, analysis of affected product details and end-customer disposition instructions from the supplier. There are two possible campaigns: one for products delivered from distribution centers to customers, and second for products delivered to GFS Stores.	\$500/Campaign (may require multiple campaigns, depending on scope of recall)
Customer Notification Fee	Outbound phone call, text and email attempts (until successful notification confirmed) per affected customer location (across multiple shifts), detailed, unified audit trail and call recordings of all recall communications via all channels (exceeding regulatory requirements), & customer contact data remediation (as needed).	5,000th + customers - \$11.00/customer 500th -4,999th customers - \$12.50/customer 1st - 499th customers - \$15.00/customer
DC Product Handling Fee	Distribution center cost of managing product(s) including removal of product from pick bay, quarantine, return, etc.	\$5/case
DC Case Destruction Fee	Distribution center cost of destroying affected product(s) such as cost of dumpster, employee labor, etc.	\$2.50/case
Customer Product Destruction Fee	GFS customer cost of identification and destruction of recalled cases on hand at time of recall.	\$5/case
Special Handling Fee	Cost of special supplier requests for GFS employees. Examples of special requests include opening cases, inspecting product(s) for specific lot codes, inspecting products for specific defects, relabeling, etc.	\$60.00/hour

Description of Revision	Revisor
Removed all references to page 4 (formerly the GFS Notification form). Removed "and withdrawal" from the last sentence on page 2.	Jeremy Anderson