



ROOTED IN NATURE

STOP, WITHDRAWAL, STAND AND/OR RECALL OF PRODUCT

1. Purpose

This procedure ensures that Grieg Seafood Sales can implement and manage a withdrawal and/or recall of unsafe or unsuitable product.

2. Scope

It applies to Grieg Seafood Sales.

3. Definitions

Withdrawal: product must be removed / returned from the distribution chain.

Stand / stop: product must remain where it is in the distribution chain.

Recall: product must be removed / returned from the consumer.

Deviation: failure to meet specified quality requirements.

Critical deviation: unit for consumption due to food safety concern (health risk).

Raw material: product meant for further processing.

Release: After agreed and documented corrective actions (e.g., corrections, re-labeling, or re-testing), product can be re-considered as safe and in compliance with quality requirements.

4. Description

4.1. Responsible

- **Sales Director and Key Account Manager:** responsible for communication with the customer(s).
- **Planner:** responsible for tracing the product in Maritech.
- **Chief Commercial Officer or Global Communication Manager:** responsible for the communication with the media.
- **Product Quality and Food Safety Lead:** responsible for documentation and formal approval of release of products that has been stopped.
- **Crisis team:** responsible for implementing and managing the product withdrawal and recall procedure in our crisis management software - RAVYN. The nominated person(s) is responsible for communication with suppliers, distributors, regulatory authorities, and certification bodies where necessary, which are all tasks that is defined through predefined templates within the system.



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4.2. Frequency

If a critical deviation has been identified Grieg Seafood Sales will immediately notify and initiate the product withdrawal and recall procedure.

4.3. Description

In instances where food safety concerns arise, the product will be held until sufficient samples are conducted to show that it is safe to be released. The release of the product, inclusive of the reasons underlying the decision and the formal approval for release, will be documented.

Should subsequent investigations establish that the product's safety cannot be ensured, an arrangement to get it destructed is activated based on **Regulatory Authorities and Certification Bodies**. The destruction process will be executed at a waste management facility authorized for such activities. During transportation to the final destruction site, the waste will be securely contained within sealed vessels, minimizing any delays in transit. Should temporary storage be necessary prior to destruction, it will get managed accordingly. The stored product will be isolated from ongoing production, stored, and clearly marked to prevent any mixing or confusion.

In the event of a product withdrawal or recall, Grieg Seafood Sales will initiate a notification process, outlining the reason for such actions. The notification will encompass essential details including product type, lot number, production date, box number and/or pallet number. Alongside, it will provide precise instructions for the orderly recall of affected products to the supplier. In this event, Grieg Seafood Sales will notify:

- **Regulatory Authorities and Certification Bodies:** depending on the severity of the deviation.
- **Distribution Chain and Customers:** all recipients of the affected product, including distributors and customers, will receive immediate notification.

If circumstances prevent communication with the affected, the product withdrawal protocol will be escalated to a product recall. In the event of a product recall, Grieg Seafood Sales will extend notifications to the entities, as detailed in the withdrawal procedure. Additionally, to a consumer outreach where consumers will be informed via a media release or advertisement, ensuring widespread awareness of the recall.