RECOMMENDED COFFEE WAREHOUSE STORAGE PRACTICES

I. LOCATION AND PHYSICAL STRUCTURE OF WAREHOUSE

Any location for the storage of coffee should be maintained on a continuing basis in accordance with the following standards:

1. The warehouse should be weather tight and rodent proof as to roof, walls, doors and windows. Any hole or opening that allows access to weather, rodents, or birds must be sealed. Floors must be free of cracks, seep holes, and crevices. Holes that are screened are considered rodent proof.

2. The warehouse should comply with all applicable federal, state and local laws, including any pertinent fire regulations and have sufficient floor load limits.

3. The warehouse should have light sufficient to permit cleaning crews to work, and weighing and sampling to be performed efficiently and to identify storage deficiencies and problems without the need for any supplemental lighting, but it need not have natural light.

4. The warehouse should have proper ventilation to the outside. Proper ventilation may include screened openings positioned to allow ventilation using prevailing winds. Windows, ventilators or other ventilating openings should be screened at all times.

5. The warehouse should not be artificially heated except to a minimum level to prevent freezing of pipes.

6. The warehouse should have (and the warehouse should maintain) a sufficient number of material handling devices (e.g., fork lift trucks, elevators, etc.), which are operable and available to perform the warehouse's duties in an orderly and efficient fashion.

7. The warehouse should be free of leaking pipes.

8. The warehouse should be equipped with operational toilet facilities, which are clean, in good repair and supplied with proper soaps, towels, etc. Alternatively, public toilet facilities must be located within 100 yards of the warehouse facility.

9. The warehouse should have signs, clearly visible in all toilets, requiring employees to wash hands after use of the toilet facilities.

10. The warehouse should have signs, clearly visible at all entrances, prohibiting smoking, eating or drinking in the warehouse except in designated areas which are closed off and separated from the storage areas.

11. The warehouse should have signs or postings, clearly visible throughout the warehouse, marking storage locations within the building.

12. The warehouse should be physically segregated from any non-coffee storage areas by walls and doors sufficient to prevent access by rodents, insects, or odors.

13. The warehouse should have a fire and theft deterrent alarm system connected to a central monitoring service.
II. HOUSEKEEPING PRACTICES

1. The floor should be maintained broom clean at all times. Active storage areas should be swept clean at the end of each workday. Inactive storage areas, corners, ledges or other non-storage areas should be kept clean at all times.

2. The warehouse should inspect the warehouse on at least a weekly basis so that the walls, ceiling, overhead pipes, and beams should be maintained reasonably free of cobwebs, accumulated dirt, dust, excrete, loose foreign matter, peeling paint or damaged insulation.

3. The warehouse should store and dispose of rubbish in a manner, which will minimize the development of odor and prevent waste from becoming an attractant, harborage or breeding place for pests.

4. The warehouse should repair cracks, seep holes and crevices in floors and walls (such as around door frames, expansion joints, pipes and sills).

5. The warehouse should maintain outside areas free of conditions, which may result in buildup of pest problems, all outside loading and unloading areas as well as the grounds around the warehouse.

   These conditions include, but are not limited to:

   A. Litter and waste should be secured in containers with tight fitting covers.
   B. Uncut vegetation (higher than four inches within property line up to 30 feet perimeter).
   C. Improper or inadequate drainage.

III. BASIC STORAGE PRACTICES

In order to ensure adequate space for sampling, inspection and effective fire protection, to assist ventilation, to aid in circulation and generally provide ample space for appropriate pest control programs:

1. Coffee should be stored on pallets that provide a minimum of 4 inches distance from the floor. In no event should any coffee bag touch the floor or overhang the edge of a pallet more than four (4) inches.

2. The pallets, including those stored for future use, must kept clean and in good repair. Before each use pallets must be cleaned of all foreign matter, including, but not limited to, dirt, dead or live insects, pupal cases, webbing, etc.

3. Coffee should be stored a minimum of 24 inches from the ceiling, and a minimum of 18 inches below any sprinkler head.

4. Coffee should be stored a minimum of 24 inches from any wall.

5. Twenty (20) inches of space should be maintained between coffee piles. The coffee piles should be stored in such a manner as to permit at least two faces (front or back and one long side) of each lot to be available for inspection and/or sampling. Coffee should not be stored higher than 5 pallets high or 100 bags high whichever is less. The equipment aisles should have at least 13.5 feet of space for equipment to operate without contacting bags of coffee.

6. Slack bags must be placed on a separate pallet in front of the pile.

7. All space requirements should be measured from the bag or the pallet; whichever is closer, to the sprinkler, ceiling, or wall, etc.
IV. STORED COFFEE

1. All coffee bags entering a warehouse should be kept clean and free from any and all foreign matter that could be detrimental to the delivery of the coffee contained therein. The owner of the coffee should be responsible for the cleaning or re-conditioning of coffee bags entering the warehouse.

2. The warehouse should be responsible to the owner for maintaining coffee bags while stored in the warehouse. The warehouse should keep stored coffee bags and beans clean, undamaged and free from any and all foreign matter (including but not limited to dirt, bird droppings, dead or live insects, pupal cases, webbing) that could be detrimental to the delivery of the coffee. The warehouse should conduct a weekly inspection of each lot of coffee to determine its condition. The warehouse should take all necessary precautions to prevent contamination/infestation of the bags. The warehouse should prepare and maintain a log documenting that the weekly inspections are conducted. The log should contain, but should not be limited to, the following information: the location of the warehouse, the date the inspection was conducted, the name of the individual conducting the inspection and any findings that require the warehouse to perform maintenance work on the bags and the lot numbers of the bags that require such work.

3. Torn bags, bags from which beans are sifting, or bags, which are in peril of having coffee beans spilled there from, must be promptly repaired. The floor must be kept free of spilled beans.

4. (A) Except with respect to the prompt repair of torn bags, bags from which beans are sifting or bags which are in peril of coffee beans being spilled there from, prior to undertaking any other maintenance of coffee bags, including the rebagging of coffee, the warehouse should notify the owner, in writing, of the maintenance to be performed.

V. PEST CONTROL

1. Warehouses which store coffee should cause recognized pest control companies to conduct periodic inspections of their facilities and implement effective pest control programs so that there should be no birds, rodents or other animals (including dogs and cats) in the warehouse.

   (I) The warehouse should maintain a written pest control program, available for evaluation, which should include:

   A. Name of key warehouse contact person
   B. Name of service provider
   C. Services to be performed
   D. Frequency of Service
   E. Conditions noted
   F. Provider comments

   (II) The warehouse should also maintain records, which reflect:

   A. Fumigation dates
   B. Fumigant used
   C. Lots/sections fumigated
   D. Owner notification
2. No ingredient used for pest or rodent control should be used in such a manner or in such places as to contaminate the coffee.

3. The warehouse should remove from the area in or around the storage facility such known bird attractions as grains, foods and similar materials.

4. The warehouse should render rodent control services at least twice per month.

5. The warehouse should maintain rodent control equipment along inside perimeter walls spaced twenty-five (25) feet, or less, apart. Rodent control equipment should also be placed on both sides of exterior entryways inside of the building at a distance not to exceed 5 feet from an entryway. Rodent control equipment can be glue boards, traps or other mechanical devices.

6. Rodent control programs should take into consideration the exterior as well as the interior conditions of the warehouse.

7. Bait is to be used only on the exterior. The bait used in the warehouse should be safe and effective. Only anticoagulant poisons or their equivalent in effectiveness and safety should be used in enclosed bait stations, with no bait being used inside the warehouse.

8. The warehouse should ensure pesticides (insecticid es, rodenticide, avicides, etc.) used in the warehouse pest control program are registered with the appropriate government agencies and used in the appropriate manner in accordance with approved label directions. Rodent tracking dust should not be used in the warehouse.

   A. If required by law, applicators are to be certified.

   B. Application must be performed in such a manner as not to damage the coffee beans.

9. One full time warehouse employee should be assigned as key contract person on pest control issues/procedures.

VI. CONTROL OF OTHER PRODUCTS STORED IN COFFEE AREAS

The warehouse should store coffee separate from other cargo that may adversely affect the coffee such as chemicals, high fire risk materials and odorous products.

No odorous products or things may be stored in such manner or place as to enable the odor to be imparted to the coffee. The odor from any odorous product or thing must not be discernible within the coffee storage area. No coffee should be stored in any area where such foreign odors prevail or where hazardous or high fire risk materials are stored.

VII. RECORD RETENTION

The following records relating to coffee should be kept and maintained by the warehouseman for at least the indicated periods of time after the coffee has been removed from the warehouse:

| Category of Document 80,                     Time Period |
|----------------------------------------------|--------------|
| Delivery Orders ................................................ .................. 1 year |
| Sampling Orders .............................................................. 2 years |
| Receiving (Stripping) Reports .................. 2 years |
| Stock Record Cards ................................................. 2 years |
| Negotiable Warehouse Receipts .................. 2 years |

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<td>Non-Negotiable Warehouse Receipts 2 years</td>
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<td>Storage Report 2 years</td>
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<td>Weight Returns 2 years</td>
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VIII. REQUIREMENTS

All records should be kept neat, tidy, orderly and current so that auditors can verify warehouse records against physical stocks.

1. Before coffee may be placed the warehouse, the warehouse must be in possession of a copy of the delivery order (or equivalent document or information) and the following identifying information for such coffee, which should be reflected in the warehouse's records relating to such coffee:
   a. Growth
   b. Number of bags
   c. Shipper's brand (if on the bags)
   d. Crop year (if on the bags)
   e. Marks and chop number (or letters) in their entirety
   f. Carrier (i.e., vessel, railroad or truck transport); location (pier, etc.); and date of arrival of vessel (where appropriate)

2. When coffee is physically placed in the store, the warehouseman should record the identifying information for the coffee on the warehouse receiving report (or equivalent record). The warehouse should also record all exceptions—i.e., the number of stained, torn, mended, slack, short or improperly marked bags. A record of any exception noted by the warehouse should be made, and the warehouse should send a report describing such exception immediately to the storer of the coffee. If no exception is noted, a report to that effect should be sent to the storer as soon as practicable. If improperly marked bags arrive at the warehouse, the storer should be notified of such fact immediately by telephone before the delivering carrier leaves the warehouse.

3. The warehouse should compare the identifying information for the coffee set forth on the delivery order or equivalent record with the information on the coffee bags. If there is a material difference between the information supplied on the delivery order (or equivalent record) and the information on the bags, the warehouse should note such difference on the warehouse's receiving form (or equivalent record) and should notify the storer of the coffee immediately of the discrepancy.

4. The warehouse should record the identifying information for the coffee, as set forth on the coffee bags, on warehouse tags or marks stenciled on the bag, which should be affixed at all times to at least two sides of each pile of coffee bags. The tag or mark should be placed on both sides of the coffee bags.

5. The warehouse should maintain stock record cards (or equivalent records) for each chop of coffee on which should be recorded all pertinent details necessary to fulfillment of an efficient warehouseman's responsibilities, including all movements of the coffee, changes in its ownership and when the coffee has been weighed.

6. The warehouse should complete, the Warehouse Advice which should identify the number of bags comprising the chop, all markings contained on the bags (in their entirety), the specific location where the coffee is stored and the name of the carrier (i.e., vessel, railroad, or truck transport) on which the coffee arrived. Copies of, or information pertaining to, the Warehouse Advice should be distributed as follows:
   (i) To the storer of the coffee, and
   (ii) Retained in the warehouse's files.
Should:

a. When a sample is drawn, the warehouse should sign three copies of the Sampling Order in the space provided.

b. By signing the Sampling Order, the warehouse should be deemed to certify that on the date the Sampling Order was signed the sampler appeared at the licensed store indicated on the Sampling Order and left the premises with samples in his possession.

c. The warehouse should retain a copy of the Sampling Order.