

NKG Supplier Conditions for Food Safety

Requirements for Conventional Green Coffee with European Union as its final destination

Version	Version 3.0
Responsible department	NG Group Compliance
Date of Publication	July 2026
Scope	NKG Supplier Management
Review cycle	When required
Revision history	Version 2.3 term Version 1.0 from 06/2023



NKG Supplier Conditions for Food Safety

Requirements for Conventional Green Coffee with European Union as its final destination

NKG Supplier Conditions for Food Safety

Requirements for Conventional Green Coffee with European Union as its final destination

This document (hereinafter referred to as the "Terms") sets out the requirements that importing companies affiliated with the Neumann Kaffee Gruppe (all or each hereinafter referred to as the "NKG Company") shall impose on their direct suppliers (hereinafter referred to as the "Supplier") with which they have signed, are negotiating or will sign in the future one or more contracts regarding the sale/purchase of conventional green coffee with final destination in the European Union (hereinafter referred to as the "Contract").

1. Objectives and Scope

The purpose of these Terms is to provide clarity regarding the requirements that, in compliance with European Union standards (outlined in Annex 1), are applicable and/or expressly agreed upon by the parties, to the collaboration between Supplier and NKG Company. Therefore, the Supplier is encouraged to use this document as a resource to align its processes, incorporate it into its own statements and practices, and, where appropriate, encourage participants in its own supply chains to comply with this document; thereby fostering smooth and compliant collaboration.

In the event that more restrictive contractual measures are applied to Suppliers, they shall prevail over this document to the extent that they conflict with it.

2. Requirements

The following requirements regarding the sale/purchase of conventional green coffee (hereinafter the "Goods"), must be taken into account:

a) Storage and Transport:

In order to prevent the formation of mold and OTA contamination (contamination by Ochratoxin A), suitable actions must be taken to reduce condensation during transport and storage of the Goods. Furthermore, the fumigation process carried out by the Supplier shall fully comply with applicable EU regulations.

b) Radiation:

The Goods must not be treated with ionizing radiation according to Directives No. 1999/2/EC and No. 1999/3/EC.

c) GMO & Allergen Labeling:

The Goods must not be subject to GMO (Genetically Modified Organisms) labelling according to Regulation (EC) No. 1829/2003 and Regulation (EC) No. 1830/2003.

In addition, the Supplier must confirm that the Goods do not contain allergens according to Regulation (EU) No. 1169/2011 regarding the provision of food information to consumers.

d) Traceability:



NKG Supplier Conditions for Food Safety

Requirements for Conventional Green Coffee with European Union as its final destination

The Supplier must implement a documented traceability system that allows the Goods to be traced from the pre-supplier to the final delivery to the customer, as required by the General Food Law (Article 18 of Regulation (EC) No. 178/2002).

Additionally, the Supplier acknowledges that the traceability obligations under this clause are complementary to, and do not replace, the requirements established by the European Union Deforestation Regulation (Regulation (EU) No. 2023/1115 - EUDR). The Supplier agrees to comply with all applicable obligations, including providing the necessary geolocation information for the origin of the Goods and any other documentation required to demonstrate compliance with the EUDR. The specific obligations related to EUDR compliance shall be defined and detailed in the Contract, without limiting the general traceability obligations outlined above.

In case of product-related emergencies, the Supplier must provide an emergency contact number that guarantees 24-hour availability.

e) Food Defense:

The Supplier must assume full responsibility of product protection within their sphere of influence, as well as area of responsibility. In addition, the Supplier must implement a hazard and risk analysis, as well as a plan for hazard prevention. Furthermore, the Supplier's employees are checked for their suitability, skills and qualifications and are trained in the legal requirements and product protection before starting their work. Clear responsibilities for product defense are defined.

f) Food Fraud:

A documented food fraud mitigation plan must be developed and implemented to control all identified risks by the Supplier. This plan relates to vulnerability assessment and is reviewed at least annually.

g) Mineral oil GMP (Good Manufacturing Practices):

Suitable measures must be taken to reduce mineral oil residues (MOSH - Saturated hydrocarbons / MOAH - Alkylated aromatic hydrocarbons) in the Goods. A solution approach according to the ALARA principle (As Low As Reasonably Achievable) is to be pursued.

h) Packaging & Contact Material:

The Supplier shall ensure that all packaging material and inks comply with all applicable EU legislation, including but not limited to:

- food contact material legislation (Regulation (EC) No. 1935/2004),
- packaging regulation (Regulation (EU) No. 2025/40 - PPWR),
- plastic material regulations (Commission Regulation (EU) No. 10/2011),
- use of bisphenol A (BPA) (Commission Regulation (EU) No. 2024/3190),
- inks applied to food contact materials (EuPIA Guideline on Printing),
- recycled plastic material (Commission Regulation No. 2022/1616, Regulation No. 10/2011)

The Supplier shall provide updated information, specifications and/or corresponding declaration of



NKG Supplier Conditions for Food Safety

Requirements for Conventional Green Coffee with European Union as its final destination

conformity, where applicable, regarding each type of packaging material. Additionally, Supplier shall make available all supporting documentation upon request and follow any process indication communicated by the NKG Company regarding packaging material. The Supplier shall promptly inform the relevant NKG Company of any non-compliance.

As the Goods are often transported in jute bags, Supplier shall assure that the bags used, or received from third parties, comply with IJO Standard No. 98 01 revised 2005 and the NKG internal limits of Mineral oil below:

Parameter	Limit	Method
MOSH	< 250 mg/kg	(DIN EN 16995:2017 / JRC 133174)
MOAH	< 25 mg/kg	(DIN EN 16995:2017 / JRC 133174)

i) Pesticides:

Appropriate measures must be taken to reduce residues of pesticides, plant protection agents (and similar) in the Goods. The delivered Goods shall comply with the applicable requirements under Regulation (EU) No. 2023/915 and the Regulation (EC) No. 396/2005.

Please refer to the most recent MRLs available at: [EU Pesticides Database - Products - Product details](#)

j) Analytical Requirements:

If applicable, the following requirements are binding unless otherwise specified in the Contract:

Parameter	Limit	Method
Ochratoxin A (OTA) (at place of arrival)	max. 3,0 µg/kg	(DIN EN 14132)
Mineral oil aromatic hydrocarbons (MOAH)	max. 1,0 mg/kg	(DIN EN 16995:2017)
Polycyclic aromatic hydrocarbons (sum of PAH 4) Benzo(a)pyren, Benz(a)anthracen, Benzo(b)fluoranthene, Chrysen	max. 25 µg/kg	(GC/MS)

k) Process management:

The Supplier shall carry out a risk-based analysis of all relevant processes with regard to potential health risks to consumers. Appropriate prevention and control measures have been established on the basis of this analysis. The Supplier shall be able to identify, withdraw from the market and recall affected products in the event of an emergency, in order to ensure that any unintended use or delivery is prevented.

The Parties agree that the NKG Company may unilaterally modify the present Terms, especially in case of modifications of the regulations applicable to the Contract or creation of new ones.

As a participant in the supply chain, the Supplier acknowledges having read the NKG Supplier Conditions for Food Safety and accepts this document within the scope of their responsibility.



NKG Supplier Conditions for Food Safety

Requirements for Conventional Green Coffee with European Union as its final destination

Annex 1 Regulation

The following standards, as well as their future modifications and amendments, must be considered by the Supplier as applicable and in accordance with this document. This list should not be understood as a limited list:

- Directive No. 1999/2/EC of the European Parliament and of the Council of 22 February 1999 on the approximation of the laws of the Member States concerning foods and food ingredients treated with ionizing radiation.
- Directive No. 1999/3/EC of the European Parliament and of the Council of 22 February 1999 on the establishment of a community list of foods and food ingredients treated with ionizing radiation.
- Regulation (EC) No. 1829/2003 of the European Parliament and of the Council of 22 September 2003 on genetically modified food and feed.
- Regulation (EC) No. 1830/2003 of the European Parliament and of the Council of 22 September 2003 concerning the traceability and labelling of genetically modified organisms and the traceability of food and feed products produced from genetically modified organisms and amending Directive No. 2001/18/EC.
- Regulation (EU) No. 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers, amending Regulations (EC) No. 1924/2006 and (EC) No. 1925/2006 of the European Parliament and of the Council, and repealing Commission Directive No. 87/250/EEC, Council Directive No. 90/496/EEC, Commission Directive No. 1999/10/EC, Directive No. 2000/13/EC of the European Parliament and of the Council, Commission Directives No. 2002/67/EC and No. 2008/5/EC and Commission Regulation (EC) No. 608/2004 Text with EEA relevance.
- Regulation (EC) No. 178/2002 of the European Parliament and of the Council (General Food Law).
- IJO Standard No. 98-01 revised 2005.
- Commission Regulation (EU) No. 10/2011 of 14 January 2011 on plastic materials and articles intended to come into contact with food.
- Commission Regulation (EU) No. 2025/351 of 21 February 2025 amending Regulation (EU) No. 10/2011 on plastic materials and articles intended to come into contact with food, amending Regulation (EU) No. 2022/1616 on recycled plastic materials and articles intended to come into contact with foods, and repealing Regulation (EC) No. 282/2008, and amending Regulation (EC) No. 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food as regards recycled plastic and other matters related to quality control and manufacturing of plastic materials and articles intended to come into contact with food.



NKG Supplier Conditions for Food Safety

Requirements for Conventional Green Coffee with European Union as its final destination

- Commission Regulation (EC) No. 2023/2006 of 22 December 2006 on good manufacturing practice for materials and articles intended to come into contact with food.
- Regulation (EC) No. 1935/2004 of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with food and repealing Directives No. 80/590/EEC and No. 89/109/EEC.
- Commission Regulation (EU) No. 2023/915 of 25 April 2023 on maximum levels for certain contaminants in food and repealing Regulation (EC) No. 1881/2006.
- Regulation (EC) No. 396/2005 of the European Parliament and of the Council of 23 February 2005 on maximum residue levels of pesticides in or on food and feed of plant and animal origin and amending Council Directive No. 91/414/EEC.
- Regulation (EU) No. 2017/625 of the European Parliament and of the Council on official controls and other official activities to ensure the application of food and feed law and rules on animal health and welfare, plant health and plant protection products.
- Commission Regulation (EC) No. 2073/2005 Of 15 November 2005 on microbiological criteria for foodstuffs.
- Directive No. 2009/32/EC of the European Parliament and of the Council Of 23 April 2009 on the approximation of the laws of the member states on extraction solvents used in the production of foodstuffs and food ingredients.
- Commission Regulation (EU) No. 2017/2158 Of 20 November 2017 Establishing mitigation measures and benchmark levels for the reduction of the presence of acrylamide in food.
- Regulation (EU) No. 2023/1115 – EUDR on deforestation-free products.
- Regulation (EU) No. 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) No. 2019/1020 and Directive (EU) No. 2019/904, and repealing Directive No. 94/62/EC.
- Commission Regulation (EU) No. 2024/3190 of 19 December 2024 on the use of bisphenol A (BPA) and other bisphenols and bisphenol derivatives with harmonised classification for specific hazardous properties in certain materials and articles intended to come into contact with food, amending Regulation (EU) No. 10/2011 and repealing Regulation (EU) No. 2018/213.
- EuPIA Guideline on Printing Inks applied to Food Contact Materials.