GENERAL MILLS GLOBAL WAREHOUSE QUALITY MANUAL

FSQ - Supply Chain

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General Mills (GMI) Global Warehouse Quality Manual

Table of Contents

	OVERVIEW	2
	Policy 01: Product Regulatory Compliance	2
	Policy 02: Product Control Traceabiliity Recall / Withdrawal	3
	Policy 03: GMPs & Sanitation Programs	5
	Standard 3.1 – Personal Practices & Hygiene	5
	Standard 3.2 – Operational and Storage Practices	5
	Standard 3.3: Facilities and Utilities	7
	Standard 3.4: Equipment	8
	Standard 3.5: Sanitation	8
	Standard 3.6: Facility Integrated Pest Management	9
	Standard 3.8: Chemicals	12
	Policy 04: Transportation and Logistics	13
	Standard 4.1: Transportation Vehicles and Containers	13
	Standard 4.2: Receiving	13
	Standard 4.3: Shipping	15
	Policy 05: Consumer Relations	18
	Standard 5.2: Customer Product, Rejects & Returns	18
	Policy 06: Product Identity & Labeling	18
	Standard 6.1: Product Labeling and Control	18
	Standard 6.2; Audit Readiness for Organic Claims	19
	Policy 07: HACCP	20
	Policy 08: Food Allergen	20
	Standard 8.2: Food Allergen Control Procedures	20
	Policy 11: Agriculture Pesticide Use and Raw Grain	21
	Policy 12: Product Donation	22
	Policy 13: Control of Physical Hazards and Foreign Material	22
	Standard 14.2: External Warehousing	23
	Policy 15: Food Defense	23
N	AR Addendum	24
	Policy 02: Product Control Traceability Recall / Withdrawal	24
	Standard 4.2: Receiving	28
	Policy 4.3: Shipping	28

OVERVIEW

Per GMI standard 14.2 – all warehouses storing GMI owned material that are not physically connected to a make plant, must follow the requirements within this Global Warehouse Manual.

These are the minimum requirements to be followed as defined by General Mills unless applicable laws or regulations have more stringent requirements. General Mills requirements shall supersede local customs or practices.

Policy 01: Product Regulatory Compliance

- 1. Warehouse facility shall have a Regulatory Contacts program. The documented procedures should be reviewed annually and should include the following elements:
 - Person or persons named (by position) to accompany all inspectors
 - Defined company/facility policy on the use of photographic and recording equipment
 - Defined company/facility policy regarding records and samples
 - Training plan to assure personnel stay current on procedures. (individual training should be documented)
 - Procedures for reporting and documenting regulatory contacts
 - Procedures for developing, documenting, and verifying corrective actions
- 2. The facility shall be in compliance with international, federal, state, and/or local registration and licensing requirements.
- 3. The facility shall have programs in place to ensure compliance with import/export regulations for the country of manufacture and the country of sale.
- 4. Warehouses storing product that will be consumed in the USA to register with the FDA and then reregister every even numbered year.
- 5. Facility shall communicate to GMI whenever a regulatory agency (or international equivalent) contact is made. Regulatory agencies in the United States could include (but not be limited to) FDA, USDA, applicable State Departments of Agriculture, State public health authorities, local public health authorities, State or Federal Department(s) of Labor (OSHA), EPA (or state equivalents). Contact, as defined, could include a telephone call, letter, or an on-site visitation.
- 6. The facility shall complete the GMI Regulatory Contact Report (attached) and e-mail it to their GMI contact and/or Regulatory.Contact@genmills.com within 24hrs (if there were observations requiring action) or 72hrs (if no observations or no action required).
 - Note: if the warehouse is contracted/owned by a copacker to store GMI owned material (rather than contracted by GMI), then the copacker should be contacted if there is regulatory contact at the warehouse. In turn, the copacker will contact GM if General Mills product is impacted.
- 7. If General Mills samples are pulled by a Regulatory authority, product should be held and reported to General Mills Quality for further instructions.

Policy 02: Product Control Traceability Recall / Withdrawal

- 1. Traceability programs at each facility shall be challenged through a traceability/mock recall exercise at a minimum of once per year.
- 2. Mock recall shall test one step back from the facility (i.e. origin of inbound material) and one step forward from the facility (i.e. destination of outbound material). All mock recalls shall be documented including:
 - o Identification of item traced (i.e. ingredient, finished product)
 - o Time for completion
 - o % of raw materials recovered
 - o % of finished product recovered
 - Key learnings, gaps, discrepancies, corrective actions, and system improvements needed to meet target criteria of (a) 4 hours or less (b) 100% recovery of material.

NOTE: Documentation essential for traceability may include: Receiving Records, Pallet Identification, Shipping records, Ship receipt discrepancy/reconciliation, Hold Orders & Disposition, Special Pack, Donation, Destroy, Dump.

- 3. Ship and receipt documentation must be retained per corporate retention requirements (eleven years).
- 4. All General Mills products and containers shall be clearly identified with a legible and accurate item number and code date representing at a minimum: day, month, year, and packaging plant.
- 5. Warehouses repacking product shall have a documented code date program that is traceable and meets General Mills requirements, local laws and local regulations.
- 6. For some regions, there may be one code date program that applies to several facilities or countries within the same region. In this case, the program shall list the following:
 - which facilities or countries the program applies to.
 - The code date program shall include requirements for: Code date accuracy, format and interpretation, legibility of code, and font size; Code date system for when the day changes within a shipping container or pallet cube;
 - Audit procedures to complete code date audits on a regular frequency as set by the Facility quality Manager.
 - The audits shall be performed at the point of packaging and shall confirm that the code date meets requirements.
- 7. "Special Pack" are products that are reconfigured for short-term promotions. The final special pack products are items such as display pallets, display shippers, or pallets with multiple items on it.
 - a. Specific code date requirements are provided in the "special pack specification" issued by the GMI Special Pack group.
 - b. Site Special Pack Coordinators are responsible for these requirements. GMI Special Pack Group works with the Special Pack Site to set up the processes.

- c. Facility Manager or designate at the location of Special Pack production shall maintain appropriate documentation to efficiently determine by code date and production code date all components used in every production code date of assembled product to insure traceability.
- d. The Customer Service Facility shall have a two-character alphabetical plant code assigned by Minneapolis FSQ to use as a plant code designation.
- 8. The receiving location shall be responsible for reconciling received products by item code, code date and quantity with the shipping records and pallet identification for every load. This information shall be retained at the receiving locations and will be used for inventory, product withdrawal and product recall purposes.
- 9. When missing or illegible material numbers or code dates on the shipping container or consumer unit are encountered by the receiving location, General Mills Warehouse Quality Manager or the On-Site Quality Manager at the shipping facility shall be contacted with a request for disposition.
- 10. A missing, incorrect or unscannable pallet identification tag shall be replaced with a pallet identification tag that has the same material code and code date and plant information as the shipping container and consumer units to maintain traceability.
- 1. Each warehouse and distribution center shall have a documented procedure to control substandard "product" (finished product, semi finished products, ingredients, packaging materials, and premiums). North America manufacturing and storage shall use HIFI. There shall be a defined call tree and resource plan to provide 24/7 coverage in support of hold initiation and containment.
- 2. All General Mills products suspected or found not to be in compliance with General Mills requirements shall be immediately placed on "Hold" and kept under control until final disposition is given by General Mills. General Mills should be notified immediately.
- 3. General Mills Quality shall be accountable for determining the quantity of product to hold. The quantity held should ensure no substandard product will reach the customer.
- 4. There shall be a process to monitor hold product and escalate to enable timely dispositions.

Non-Hazardous Holds:

- 1. All affected product shall be secured physically.
- 2. All affected product shall be secured electronically.

Hazardous hold:

- 1. Product shall have the following identification and movement controls:
 - o Identification: All hazardous hold product shall be physically identified with "Hazardous Hold" stickers on all 4 sides of each pallet. In North America, a red hold order label shall be used.
 - Movement Control: All hazardous hold product shall have a minimum of 2 of the following movement controls:
 - Electronically secured
 - Physically secured/locked
 - Physically isolated/segregated
- 3. If hazardous hold product is in transit to a warehouse, the warehouse should receive it into inventory when it arrives and store it in their facility (on hold). ALL HOLDs (hazardous & nonhazardous) Hold inventory on a trailer must be unloaded. If the inventory cannot be unloaded due to storage utilization at the site or labor constraints, the quality manager must provide approval.

Policy 03: GMPs & Sanitation Programs Standard 3.1 - Personal Practices & Hygiene

- 1. Facility personnel, including contractors and temporary employees, shall receive documented personnel practice and hygiene training prior to performing any work or services and refresher training at least once per year to ensure compliance to this standard. Completion of training for each person shall be documented.
- 2. Designated areas requiring adherence to personnel practice and hygiene requirements shall have signs clearly posted at all entry points.
- 3. Visitor and contract worker access to the facility shall be limited and controlled as determined by the Facility Manager and as appropriate for the purpose of the visit or work.
- 4. Employees with open wounds or communicable diseases should not contact the food.
- 5. Eating, drinking, smoking, chewing gum or use of tobacco products shall not occur in any production, packaging, storage, handling or maintenance area. These activities shall be limited to specific designated areas at the facility as determined by the Facility Manager and Facility Quality Manager.
- 6. Personnel and visitors shall maintain personal hygiene and cleanliness so as to prevent contamination via perspiration, hair, hands, cosmetics, lotion, perfume, medications, soil, filth, microorganisms, clothing, or any foreign substances.
- 7. Signs reminding personnel of hand washing requirements shall be clearly posted in restrooms, eating areas, smoking areas, above sinks.

Standard 3.2 - Operational and Storage Practices

- 1. A documented quality management system must be in place that ensures product is stored and distributed to maintain food safety and quality. Management is responsible for ensuring that the system is properly communicated, trained, understood, implemented, and sustained at all levels of the organization. Clear lines of authority shall be defined.
- 2. Documented training programs should be available for review that demonstrate that employees have received basic good manufacturing training, food hygiene training and other pertinent training to assure that tasks, as assigned, are performed in a manner that does not jeaprodize food safety or quality.
- 3. Each facility shall have pallet practices to manage food safety risks associated with pallets. Prior to use, all pallets (wood and plastic) shall be inspected to be clean, in good condition with no signs of pest activity or spilled food/ingredients.
- 4. Each facility shall have a sorting and removal process to decommission pallets in bad condition.
- 5. For incoming ingredients, slipsheets shall be used between pallets and the bottom layer of any ingredient sack, bag, or box. If pallets are stacked, slipsheets or other effective barriers shall be used between the top layer and the next pallet to protect ingredients from damage and potential contamination.
- 6. For export product, pallets shall meet the requirements of the country of destination.
- 7. Products/materials shall be stored under conditions that are sanitary, properly designed, and adequately maintained.
- 8. Products/materials shall be stored off the floor on clean surfaces at all times (i.e. on a slipsheet, rack, or pallet).

- 9. Raw agricultural products (e.g. grain, fruit, vegetables) should be handled to prevent contamination prior to further processing.
- 10. Products/materials shall be stored under good conditions, and protected from environmental sources of contamination from ceilings, ducts, overhead structures, and adjacent operations.
- 11. Products/materials are stored away from open windows and doors, unit heaters, vents, stairways, refrigeration units, and motors to help maintain product integrity.
- 12. Products/materials shall be stored with sufficient space (minimum 18" or 45 cm) between the product/material and walls to allow for sanitation, inspection and pest control activities to be carried out.
- 13. There shall be adequate space between rows of stored product/material to prevent product/material damage, and enable detection of damage and/or spillage.
- 14. When required by the product or material specification, environmental storage requirements such as temperature and humidity shall be maintained, monitored and documented. General temperature storage requirements are listed below.

Products	Storage Requirements		Cold Action Temp		Warm Action Temp	
Products	°C	°F	°C	°F	°C	°F
Haagen-Dazs Ice Cream	≤-23°C	≤ -9.4°F	Not Applicable		>18°C	0°F
Refrigerated/Chilled Yogurt	2-6°C	35.6 - 42.8°F	<-3°C	27°F	> 7°C	45°F
Refrigerated/Chilled Dough	2-8°C	35.6 – 50°F	<-3°C	27°F	> 10°C	> 10°C
Other Refrigerated/Chilled Products	1-5°C	33.8 - 41°F				
	. 100C	≤ 0°F			> -7°C	20°F
Oth on European Day do etc					strudels/scrambles/pizza	
Other Frozen Products	≤-18°C				> -12°C	10°F
					All Other	products

15. Products/materials shall not be stored directly adjacent to materials which could cause potential contamination or odor transfer.

NOTE: Examples include storage adjacent to strongly odoriferous food and non-food materials (e.g. certain spices and products, soaps, lumber, chewing gum), potentially hazardous non-food materials (chemicals, soaps, lubricants, solvents, glass, plastics, bagged pesticides), or non-human food (animal and pet food).

- 16. All General Mills products and materials shall be stored in an inventory tracking and documentation system that provides accurate tracking, stock rotation, monitoring of old age and shelf life limits, and allows accurate identification of "on hold", recovered recall product, and test materials.
- 17. Damaged products and materials shall be promptly removed from the storage area. Any spills or product damage should be cleaned up immediately.
- 18. General Mills products and materials shall be evaluated for quality, deterioration, physical damage, or potential contamination. Whenever inadequate storage conditions are encountered, prompt disposition shall occur by General Mills.

Standard 3.3: Facilities and Utilities

- 1. Vegetation growth around the facility exterior should be well-maintained, rain water not allowed to pool, litter and other extraneous debris should be removed.
- 2. Roof areas should be free of debris, standing water and be in good repair. Any Louvers, vents or screens should be maintained so pests cannot enter the building.
- 3. Facilities shall have an effective program to manage facility and utility construction, repair and maintenance work.
- 4. Facility boundaries shall be clearly defined, identified and controlled.
- 5. All exterior structures, ramps, roads and parking lots shall be maintained in good repair.
- 6. Dumpster/compactor equipment should be maintained so that there is no excessive spilling of materials.
- 7. Dumpsters/compactors should be covered and emptied at an appropriate frequency to maintain sanitary conditions.
- 8. Building exteriors shall be designed, constructed and maintained to provide protection against environmental elements (e.g. rain water run-off), pest attraction, harborage and roosting sites.
- 9. For exterior structures that are not completely enclosed (e.g. covered or open bulk unload area), additional precautions shall be taken to ensure product safety and to prevent product contamination.
- 10. Dock Doors, pedestrian doors and windows need to be on a maintenance and inspection program to maintain them in proper working order and close any gaps.
- 11. Ventilation and In-Take fans should be maintained to there are no entry points for pests.
- 12. Interior walls, supports and beams should be maintained so they are clean and free of any damage.
- 13. Facilities shall provide adequate natural and/or artificial lighting that meets applicable laws and regulations and enable personnel to operate in a safe and sanitary manner.
- 14. Light fixtures and bulbs shall be protected (safety coated or enclosed) to ensure products, materials or equipment are not contaminated in the case of breakage.
- 15. Floors should be well maintained and free of cracks and deep fissures. If cracks and damage is evident, a program should be in place to periodically remove debris and repair damage.
- 16. There should be an on-going maintenance program in place to seal and repair damaged floors.
- 17. Drains shall be designed and located to allow for adequate drainage and cleaning.
- 18. Utility equipment and lines must have a maintenance program in place to maintain them in a manner that will not pose a risk or contaminate products stored in warehouse locations.

Standard 3.4: Equipment

- 1. Equipment must be kept in good repair so that it does not become a source of contamination.
- 2. Storage freezer or refrigeration units shall be temperature monitored, preferrably with a continuous temperature recording device covering a minimum of seven days.
- 3. Temperature variation within the refrigerated/frozen storage area should be established.
- 4. The temperature recording devices shall be placed in the warmest location within the freezer/refrigerator.
- 5. All equipment used to monitor temperatures shall be properly calibrated at least once annually.
- 6. Records associated with the temperature controlled products must be available/retrievable.
- 7. Facilities with freezers and refrigerators shall have controls in place to identify temperature deviations to minimize product deterioration. General Mills recommends having a high-temperature sensor and alarm system feeding back to an alarm company which should have a list of emergency contacts at the facility.
- 8. Equipment used for transporting/moving products or materials through the facility (e.g. forklifts, pallet jack) and lift equipment (e.g. scissor lifts) shall be maintained in good condition and shall not be a source of contamination. Maintenance and sanitation shall be scheduled and documented.
- 9. Idle equipment will have an inspection process in place to ensure that idle equipment does not become a pest harborage.

Standard 3.5: Sanitation

- 1. Documented annual training is required for all personnel who perform sanitation tasks.
- 2. If a warehouse facility is working with open food containers or food contact equipment, consult General Mills for additional requirements for sanitation of food contact equipment/tools/containers/packaging.
- 3. Facilities shall develop, implement, document and manage a Master Sanitation Schedule (MSS) to ensure all areas and equipment are identified, cleaned and/or sanitized and documented on an established frequency.
- 4. Standard sanitation operating procedures (SSOP) should be in place. Areas and equipment on the MSS shall include but not be limited to:
- 5. Receiving, shipping, and storage areas (including dock doors, ramps, compactors, trash docks, transload equipment, idle equipment)
 - Special pack systems, related equipment, parts and associated areas
 - Drains (separate tools and plumbed properly to a sanitary sewer)
 - Cleaning/sanitizing equipment (including transload equipment and maintenance of cleaning/sanitizing equipment)
 - Transporting equipment (e.g. forklifts, pallet jack) and lift equipment (e.g. scissor lifts)
 - Air handling ductwork, HVAC, utility rooms and other utility areas
 - Facility structures (e.g. ceilings, floors, walls, racking, outside grounds, offsite storage)
- 5. Appropriate cleaning and sanitizing shall occur after maintenance activities, repairs and special events such as construction or infestation.

- 6. All facilities shall develop a documented program to manage janitorial tasks to ensure all areas are identified and cleaned on an established frequency. Areas shall include but not be limited to:
 - Bathrooms
 - Locker rooms
 - Cafeterias
 - Office Areas
 - Annex areas/training facilities

Standard 3.6: Facility Integrated Pest Management

- 1. The company running the warehouses shall develop, implement, document and maintain an effective integrated pest management (IPM) program that includes:
 - pesticide usage and control
 - rodent control
 - insect control
 - bird control
 - wildlife control
 - sanitation, maintenance and facility audit/inspection and monitoring.

Note – hiring an external pest control company does NOT meet all the requirements of an integrated pest management program.

- 2. Routine audits of the IPM program should be completed by the designated individual and an annual audit shall be completed.
- 3. A designated point person shall be in place at each WH to oversee the IPM program. This individual will be responsible for the following:
- 4. Ensure that an effective sanitation process is in place to prevent pest issues
- 5. Work with Warehouse maintenance to identify damaged doors that do not close properly or have gaps that could allow pests to enter.
- 6. Review the weekly report and speak with the pest control operator
- 7. Follow up on corrective actions or gaps that have been identified by the pest control operator
- 8. Walk with the pest control operator two times annually, during a service visit, to verify the program is working and identify any gaps
- 9. Read and understand the current contract and services that are provided.
- 10. A documented annual assessment must be on file to show a full inspection of the facility and identify any gaps. This assessment can be a foundation for planning repairs, changes to the current contract or improvements to the overall integrated pest management program.
- 11. A Pest Sighting Log should be in place at the WH. This log will allow any pest activity that is found or noted by individuals at the WH to document the activity and the pests. This will be available to the pest control operator and discussed on a weekly basis.

- 12. All employees working in the warehouse have initial (upon hire) and annual training on how to identify pest activity, and how to report pest activity once identified.
- 13. Ensure that product/material in the warehouse is kept 12-18" away from the walls to allow pest control operator to check traps along the wall.
- 14. Verify the Pest Control logbook is accurate and all invoices, pesticide treatments and service reports are up to date.
- 15. Verify the landscaping and Warehouse grounds are maintained in a way to prevent pest harborage.
- 16. General Mills shall receive communication if there is an infestation in the warehouse where General Mills owned material is stored.
- 17. All documents that are part of the integrated pest management program shall be provided to General Mills upon request.

PEST CONTROL PROVIDER

- 1. Hiring external pest control service is not required. If trained, qualified people work for the warehouse they may provide the pest control service as part of the warehouse Integrated pest management program that meets General Mills requirements.
- 2. The pest control provider shall have a thorough integrated pest management program that will include the following:
 - An initial facility assessment to determine what pests (rodent, bird, insect, wildlife) are highest risk and should be covered by the Pest Control Contract. Rodents (mice/rats) shall be covered and typically insects as well.
 - The pest control provider shall have a Pest Control Logbook on site at the warehouse. It shall contain the following:
 - Signed contract/agreement noting frequency of services provided
 - Facility Maps indicating where pest traps are located
 - Signed Service Reports (including traps checked, findings and pest conducive conditions throughout the warehouse)
 - Certificate of Insurance & License (to all applicable local/state/country laws)
 - Approved Pesticide list
 - Pesticide usage log to include:
 - EPA Registration number
 - Pesticide name
 - Date and Time of application
 - Lot Number
 - Quantity used
 - Rate of application
 - Target Pest
 - Initials of applicator/operator

- Past pest trend analysis reports
- Service reports for special service (fogging, fumigations, etc.)
- Annual documented assessment of the program
- Phone numbers for contacts in the event of added services needed
- Insect Light Trap activity and annual bulb change date
- Documented findings of anything conducive to pest activity:
 - Webbing found
 - Gaps in Doors
 - Findings, gnawing or catches in exterior bait stations or interior traps
 - Building gaps or deficiencies to include floors
 - Sanitation gaps
 - Bird nesting
- Pest control operator shall elevate concerns to his/her supervisor and higher-level authority in the warehouse or to General Mills if the findings (noted by the pest control operator) are not addressed in a timely fashion or if there is a repeating offense.
- The Supervisor of the pest control company will do an annual inspection of the program at the warehouse and evaluate how the pest control operator is managing the contract.
- Pest control provider will include a monthly inspection of the facility to identify any gaps that need to be addressed by the warehouse. This should be part of one of the scheduled visits and will include all areas of the warehouse, offices, cafeterias/break rooms, restrooms, pallet inventory and any other locations deemed at risk by the pest control operator.
- Insect light traps will be in place to capture and identify flying insects. Insect light trap program will include:
 - Weekly inspections and counts of insects
 - Glue board replacement
 - Bulbs will be shatter proof or coated to contain any breakage of bulbs
 - Labeled with location and identifying number
 - Bulbs will be changed out annually and the date of the bulb change documented in the pest log book.
- o If stored pests are a concern (given the type of product stored at the warehouse), the pest control provider shall include a stored pests program (typically Drug Store Beetles, Cigarette Beetles, Indian Meal Moth, Red Flour Beetles, Confused Flour Beetles, Saw-toothed Grain Beetle and Warehouse Beetles). The program shall include the following:
 - Inspect the facility to determine pest species, locate breeding sites, and look for other signs of Stored Product Pest activity and conditions which may indicate an Infestation.
 - Establish a pheromone monitoring program (with set frequency) to help identify activity early and location of activity. All traps will be dated when checked and the bar code reports will note trap conditions at the time of service.
 - Provide recommendations on structural and sanitation practices that can be improved to minimize stored product pest activity.
 - Provide targeted product applications during regular service visits for stored product pests in key areas of concerns
- o Interior rodent traps to be numbered and checked weekly:

- Bar code shall be inside the mechanical rodent traps so the pest control operator will have to open the trap in order to check for mice and scan the bar code to confirm that the trap has been checked
- The mouse entrance into these traps should be free of debris and in working order.
- Placement of interior traps and distance between rodent traps shall be determined based on history and risk level. (Note: Examples of higher risk areas include trailer/rail dock doors, personnel doors, idle equipment storage areas, and areas under construction.)
- Toxic rodenticide bait shall not be used in traps inside the facility. Attractant may be used in traps within the warehouse but must not pose a risk of allergen contamination. Trap types include wind-up traps, snap traps, glue boards, etc.
- Exterior rodent bait stations shall be numbered and checked/refreshed monthly unless covered by snow. They should be kept locked and secured, free of debris and the date bait refreshed should be recorded in bait station. The bar code shall be inside the bait stations so the pest control operator will have to open the bait stations in order to check for rodents/bait consumption and scan the bar code to confirm that the trap has been checked.
- Pest control provider shall provide an escalation plan to address increasing pest activity in/around the warehouse.

Standard 3.8: Chemicals

- 1. Chemicals include: lubricants, maintenance area chemicals, sanitizers and cleaning chemicals, pesticides/fumigants. If a warehouse uses or stores any of these chemicals then they shall have a documented comprehensive chemical control program which at a minimum includes the following:
 - Procedures for chemical storage including permanent and mobile storage units (e.g. maintenance carts)
 - o Procedures for chemical clean-up (i.e. if there is a spill, after use, etc)
 - o Procedures for documentation (e.g. quantity used, site of usage, concentration)
 - o Procedures for discarding chemicals
 - o Procedures for ensuring only approved chemicals are used.
- 2. Chemicals shall be approved for intended use and used in a manner that complies with the label directions, all applicable laws and regulatory requirements, and General Mills requirements.
- 3. Chemicals shall have current label (including the composition) and technical information (SDS) that lists all chemical components and proper directions for use kept on file at the warehouse and/or readily accessible.
- 4. Chemicals shall be stored in a separate, secure (locked or otherwise access controlled) area when not in immediate use.
- 5. Chemicals (such as penetrating oils and cutting oils) and maintenance diagnostic chemicals (such as dyes) shall only be used in designated separate maintenance areas away from food storage or handling areas unless food and food packaging has been removed.
- 6. Solvent chemicals (i.e. hydrocarbons, petroleum distillates, or other water immiscible solvents) shall only be permitted for the removal of grease, oil, wax, resinous materials, or other substances not readily removable using acidic or alkaline cleaning agents.
- 7. Warehouses that perform their own pest control and/or store pesticides on site shall have a pesticide chemical control program to effectively manage the risks associated with pesticides.

Policy 04: Transportation and Logistics Standard 4.1: Transportation Vehicles and Containers

- 1. Transportation vehicles or containers which have transported hazardous waste, as defined by applicable laws and regulations, which includes but is not limited to trash, garbage, waste, asbestos, toxic materials, and infectious or medical wastes, be used for shipment of General Mills products, ingredients, packaging materials, and premiums even after cleaning.
- 2. Empty trailers stored on-site shall have the trailer doors closed.
- 3. Transportation vehicle and container inspections shall be documented and at a minimum shall include inspection for:
 - Cleanliness
 - Free from structural defects (dime sized holes to allow rodent entry, holes in ceiling to allow moisture into vehicle, nails or sharp edges sticking out that will damage product upon loading)
 - Free of any evidence of potential contamination including rodents, birds, insects, dirt, mold, dust, scale, oil, grease, metal, glass, objectionable odors, toxic materials, asbestos, trash, garbage, nonfood chemicals, cleaning material residues, infectious or medical wastes, or any other type of foreign material
 - Working condition of temperature control device and temperature indicator device (for temperature controlled shipments)
 - Any failure requires the removal of the trailer from service until the failed criteria is addressed.
- 4. Each warehouse shall keep a log of transportation vehicles and containers rejected for not meeting industry or General Mills requirements. The log shall include transportation company, vehicle/container number, and date.

Standard 4.2: Receiving

- 1. Prior to unloading, all vehicle openings and security seals shall be inspected for damage or tampering.
- 2. All security seals shall be intact, and seal numbers shall be matched to the "Bill of Lading" (BOL), which is also referred to as "Delivery Note" in some countries. Inspection and results shall be documented.
- 3. The seal should not be cut by the truck driver (carrier), but by a General Mills or warehouse employee.

Missing security seals, open seals, or seal numbers not matching the Bill of Lading shall be noted on the Bill of Lading and contents shall not be received until the Facility Quality Manager or designate has completed risk assessment and disposition of load. A chain of custody investigation shall be completed if deemed necessary.

4. Receipt of all shipments shall be documented to include date received, shipper, vehicle numbers, description of contents, and confirmation that the seal was intact with contents verified to match the load documentation.

Note -Security seals or padlocks should be used when feasible for multi-stop vehicles such as Less Than Truck Load (LTL), delivery trucks, or route trucks. Seal numbers are not typically recorded on the Bill of Lading for multi-stop vehicles.

- 5. A documented inspection shall be completed of all incoming vehicles and shipments to assure the quality and integrity of the shipment as well as conformance to any shipping requiremets in the Bill of Lading or company specifications; an inspection failure shall trigger a hold and a quality review.
- 6. Procedures shall exist to verify that quantities, material codes and lot codes are legible and match the information provided on the Bil of Lading or purchase order. During inspection, observation shall include any signs of damage, pest activity, moisture or package deterioration.
- 7. Temperature controlled vehicles and all recording devices shall be examined and verified to be at the required temperature, commonly specified on the Bill of Lading, prior to unloading. If the vehicle temperature is not compliant with the specified temperature, product temperature shall be verified.
- 8. The Logistics Department at the receiving location shall handle claims for recovery of costs from the carrier.
- 9. Fumigated railcars shall be handled by trained personnel in a manner consistent with the fumigant label, fumigation rules and regulations, and any other applicable legal considerations. Prior to unloading a fumigated vehicle, the following shall occur:
 - Protect contents and aerate fumigated railcar.
 - Account for all fumigant packets (if packets are used).
 - Visually inspect top of the load.
 - Remove all fumigant materials and warning placards and handle according to the fumigation manufacturer's recommendations, company requirements, and all applicable laws and regulations, including immediate removal of spent fumigant materials to secured and properly ventilated storage site.
- 10. If there is any suspected concern (e.g. damage, tampering, contamination) with the vehicle and/or shipped materials, the receiver shall notify the shipper, carrier, and Facility Quality Manager for the receiving facility prior to unloading to determine final action (i.e. receive or reject). Whenever possible, rejected materials that could lead to contamination of other materials or the facility should not be allowed to enter any facility that stores General Mills products.
- 11. If any amount of the suspected or determined unacceptable material was unloaded, the Facility Quality Manager for the receiving facility shall be immediately notified. The suspect materials shall be separated. A record shall be kept of all quantities. Railcars that do not have internal compartments separating the contents shall be rejected as a whole load.
- 12. When whole loads are rejected, the carrier shall be notified to make an inspection, and the shipper shall be notified to make a disposition for the load.
- 13. In the U.S., for domestic General Mills finished product shipments to Customer Service Facilities, follow Logistics Department procedures concerning any rejected loads.
- 14. For rejected import shipments, contact Import/Export Operations for guidance around disposition.

Standard 4.3: Shipping

- 1. Procedures shall exist to verify that quantities, material codes and lot codes are legible and match the information provided on the Bil of Lading or purchase order paperwork. For every outgoing shipment, the following information shall be on the Bill of Lading (or equivalent paperwork):
 - Seal numbers of each security seal attached to the vehicle.
 - Vehicle information including transportation company and vehicle number.
 - Origin and destination points (name and address).
 - Load description (e.g. name of product, GMI finished product code, GMI ingredient code, packaging material).
 - Code Markings or Lot Identification.
 - Quantity of each Lot/Code Marking.
 - General Mills purchase order number or invoice number.
 - Scheduled date of arrival.
 - Temperature requirement and verification at time of shipment (for temperature controlled loads only).
 - Fumigation dates and dosage (for in-transit rail fumigation only).
- 2. Kosher and halal-certified ingredients shall be shipped bearing the appropriate kosher or halal symbol or other documentation as required by the vendor's certifying agency and as indicated by kosher or halal certificate.

Security Seals

- 3. All vehicles and containers shipping General Mills products, ingredients, packaging materials, premiums, and food processing and handling equipment shall be properly loaded and immediately sealed in order to minimize the risk of contamination or tampering of the load. This also includes storage trailers, shuttles and bulk trailers. (Employee of General Mills or the warehouse or its agent should apply the seal, not the truck driver.)
- 4. All seals shall be tamper evident and have a unique identification number which shall be included with the Bill of Lading (BOL) and recorded by the shipper. Outbound trailer seals must be inspected as intact and verified against the bill of lading at the point just prior the trailer exiting GMI property (at a secured control point/gate if drop trailers are on site). Specifications for the tamper evident seal used shall be based on applicable laws and regulations and risk assessment. The risk assessment shall include consideration of shipping and load conditions such as load type, time in transit, route conditions, materials of transport, plant location, or country.
- 5. For import/export shipments: ISO PAS 17712 compliant seals shall be used for all imports to the U.S. The exporting country shall ensure the seal used is in compliance with the importing country's seal requirements.
- 6. Seals are not required for common carrier LTL (Less Than Truck Load) non-bulk vehicles that are not under a supplier's direct control or have more than one drop off point. However, the use of a lock is highly encouraged. If a stop in transit is necessary, the doors shall be secured if the driver is away from the vehicle.
- 7. Security seals shall remain intact until received at the first receiving location. If the seal is in any way compromised, the carrier's driver shall note on the Bill of Lading the time, date, place, and circumstances surrounding the breaking of the seal or discovery of non-intact seal. In addition, the compromised seal shall be replaced with a new seal with the new seal number recorded on the Bill of Lading. The carrier

shall contact GMI origin location (if shipping from GMI or contract location) to inform of broken seal at the time of discovery.

General Requirements For All Shipments

- 8. Regardless of size or quantity of shipments, all shipments shall protect the quality and safety of all General Mills products, ingredients, packaging, and premiums. Precautions shall be taken to avoid damage, leakage, and odor transfer. Only clean and undamaged materials shall be loaded, unless the load is dispositioned for destruction.
- 9. Slipsheets and/or pallets shall be used to minimize any potential damage or contamination to the products and materials being shipped.
- 10. Pallets shall be in compliance with applicable laws and regulations of the receiving country. For example, most countries require compliance to ISPM 15 standards of heat treated or fumigated pallets to avoid invasive insects coming into the country.
- 11. The carrier shall maintain the integrity of the load while in transit. If a stop in transit is necessary, a secure area shall be utilized or the load shall be secured. Refer to Security Seals section above. Under no circumstances shall a carrier allow GMI shipments to come in contact with contaminating agents or in any way be contaminated while in transit.
- 12. When specified in the shipping requirements listed in the Bill of Lading or company specifications, vehicles shall be examined to verify that the contents will be properly protected from freezing or excessive heat prior to loading.

Hazardous Material

- 13. General Mills food grade ingredients classified as hazardous (such as flammable flavors) shall be handled and shipped according to General Mills requirements and applicable laws and regulations, including adequate containment and protection from all other materials. Proper documentation, such as Safety Data Sheet (SDS), shall accompany the load as required by applicable laws and regulations. NOTE: This does not pertain to ingredients or products classified as "hazardous" due to foreign material or food safety reasons. It also does not pertain to marine pollutants, explosives, or corrosives.
- 14. Under no circumstances shall hazardous non-food materials be shipped with General Mills products, ingredients, packaging materials, or premiums. General Mills products, ingredients, packaging materials, or premiums shipped via LTL (Less Than Truck Load) shall not be shipped with other materials that could compromise the quality and safety of the product or raw material which includes but is not limited to hazardous non-food grade ingredients, materials that have been exposed to pathogens, other hazardous material, or waste.

Temperature Controlled Vehicles

- 15. It is the shipper's responsibility to assure compliance to temperature specifications including all communication with the carrier at the time of loading, during transit, and upon arrival at the receiving location.
- 16. Temperature controlled vehicles and all recording devices shall be examined to verify proper operation prior to loading.
- 17. The temperature of the vehicle shall be at the specified temperature prior to start of loading. Once the vehicle has been loaded and doors closed, the vehicle shall not be released for shipment until the specified temperature has been reached.

Railcars & Vehicles Under Fumigation

- 18. It is the shipper's responsibility to assure compliance with fumigation specifications and applicable laws and regulations including communication with the carrier at the time of loading, during transit, and upon arrival at the receiving location. The shipper shall have prior written authorization to fumigate loads prior to shipping to GMI locations.
- 19. All vehicles specified for fumigation shall meet the following requirements:
 - Inspected for the ability to perform a fumigation effectively prior to loading.
 - Fumigated by trained and certified personnel.
 - Fumigated according to General Mills requirements and applicable laws and regulations.
 - Fumigated with an approved fumigant at a temperature and exposure consistent with fumigant label or applicator manual.
 - Properly placarded to communicate date and type of fumigation including amount of fumigant used.

Requirements for Other Types of Shipments

- 20. Bulk Railcar & Bulk Trucks: Bulk rail hatch covers and bulk truck hatches shall be covered with a heavy plastic liner (minimum 2mm thickness) prior to closing to prevent leaks and contamination.
- 21. Bulk Trucks: All vehicle openings and access points shall be protected to prevent contamination at all times, including vehicle loading, unloading, and aeration.
- 22. Rail Boxcars: Sidewalls and ends of rail boxcars shall be adequately protected from damaging the product. Protection methods include but are not limited to:
 - Dunnage is critical to prevent product from moving during transit and appropriate amounts and type should be used.
 - Wood interiors and/or insulated cars should be lined with 50 lb. Kraft paper or other suitable material.
 - Paper containing asphalt shall not be used.
 - The paper shall extend above the load line approximately one foot in a continuous strip.
 - The top of the ingredients shall be covered with paper or slip sheets.
 - Paper shall be placed crosswise with the curl down.
 - Slip sheets can be used between product and the walls or bulkheads for additional protection.

NOTE: Steel cars shall be clean and in good repair; however, paper lining may not be practical due to temperature and adhesion properties in cooler weather.

23. Organic-Certified Shipments: The shipper shall be responsible for maintaining the organic integrity of all shipments by preventing co-mingling and contamination during storage and transit. All purchase, transit, and delivery documentation shall identify organic ingredients as organic.

Policy 05: Consumer Relations Standard 5.2: Customer Product, Rejects & Returns

- 1. General Mills Quality shall be involved in product rejections and returns due to suspected or confirmed product quality, product safety, or regulatory issues. The personnel involved varies by the specific circumstances of the rejection or return.
- 2. General Mills Quality shall determine the following:
 - who is authorized to inspect product and, if necessary, the shipping vehicle
 - the extent of the issue
 - further necessary actions
 - if product hold is necessary
 - corrective actions
 - disposition
- 3. Any product returned to the shipping location shall be inspected by authorized personnel upon return to the shipping location.
- 4. Product placed on hold shall remain on hold until official Quality investigation and disposition.
- 5. For damaged product, Quality shall investigate and determine the cause for product failure and extent of issue.
- 6. Returned product shall be transported at the appropriate temperature to maintain product identity and safety.
- 7. Steps shall be taken to ensure product traceability throughout the rejection/return process. The original shipping location to whom the product is returned shall record all code date information of product taken back into General Mills inventory for accurate recall/withdrawal and product traceability.
- 8. GMI requested returns: Once product is returned, it shall be isolated, placed on hold, and accounted for to ensure product is not accidentally shipped or destroyed prior to official disposition from General Mills Quality.

Policy 06: Product Identity & Labeling Standard 6.1: Product Labeling and Control

- 1. Countries in which General Mills products are sold shall have a documented Label Control Plan in place to assure products are accurately labeled according to applicable regulations for the country of sale and General Mills requirements. At a minimum, the Label Control Plan shall include who is responsible for ensuring completion and accuracy of each component:
 - Procedures for label development and label approval as required by GMI and applicable regulatory agencies (including declarations, product claims, allergen labeling,)
 - Change management procedures necessary to assure products have accurate labels when there is a change in product formula or product label.
 - Procedures for managing the labeling process to ensure correct labels are applied.

Standard 6.2; Audit Readiness for Organic Claims

- 1. Any General Mills-affiliated warehouses that only 1) store organic ingredients or food-contact packaging materials for organic products, and/or 2) distribute product with organic certification shall maintain organic integrity of all materials and products in their facilities.
- 2. Any General Mills owned or contracted facility that performs "Speial Pack" will need to have a documented plan detailing what is required to maintain the organic integrity of the products manufactured, warehoused or distributed within their control.
- 3. The documented plan shall be approved by the entity's certification agency. In the U.S., this documented plan is the Organic Compliance Plan (OCP) and shall be referred to as such throughout this standard, though other international organic standards and certifiers may use different terms to describe this plan.

Organic Integrity Requirements -

1. MAINTAIN PACKAGE INTEGRITY:

- Finished packages or containers may not be opened
- Original lot codes of the products may not be altered
- Repackaging (often referred to as special pack not exposing food but repacking individual containers into a new outer case) is allowed for organic product but will require organic certification if the new packaging contains organic statements/symbals.

2. PREVENT COMMINGLING:

- Organic and non-organic finished products and ingredients may not be mixed**
- Standard warehousing operations sufficiently meet this requirement. Organic packaged and sealed products and ingredients that remain packaged and sealed in storage are not in danger of violating the commingling prohibition.

3. PREVENT CONTACT WITH PROHIBITED SUBSTANCES:

- Contamination may not occur from exposure to pest management or cleaning materials
- Impermeable Packaging: Please be advised that ingredients and product packed in impermeable packaging such as bottles and cans are excluded from contamination concerns. Cartons and corrugate are NOT considered impermeable.
- Permeable Packaging: If pesticide fogging, pesticide sprays, or prohibited cleaning supplies are applied to areas where organic ingredients or product is stored and packaging may be permeated by the pesticides, the organic products must be removed prior to the application or protected with impermeable coverings. The required aeration time prior to the return or uncovering of organic product and materials is three times the treatment's directed aeration time. For example, a directed aeration time of 8 hours would mean a minimum 24 hours period of protection.
- Food-contact packaging inventory: Any inventory of food-contact packaging must also be protected from contamination, similar to any food ingredient.
- Documentation of pesticide program and procedures must be maintained
- Demonstrable Proof Standard: All pesticide treatments and product movement or covering must be documented in such a manner as to provide demonstrable proof that organic ingredient and product

integrity has been maintained. Records must note type and time of treatment, time and location of product movement or covering, places of off-site storage, treatment's recommended post-application aeration time, and time of return to warehouse – keeping in mind the 3X rule noted above.

Policy 07: HACCP

- 1. All facilities that produce or package General Mills products (this includes warehouses repackaging product into allergen containing packaging or stickering for language) shall have current, effective, and documented Hazard Analysis and Critical Control Point (HACCP) Programs to manage food safety hazards.
- 2. Facilities that store General Mills products under temperature control for food safety shall have a current, effective, and documented HACCP program to manage food safety hazards. (Please contact General Mills Quality to determine if temperature control is a food safety hazard for the specific food products being stored at a given facility.)
- 3. Warehouses shall have effective and documented prerequisite programs to ensure that sanitation, pest control and maintenance are in place to maintain a hygienic environment throughout the food chain.
- 4. The HACCP plan should contain a list of prerequisite programs:
 - Hazard analysis (to identify potential hazards)
 - Flow diagram of the process flow
 - Applicable Critical Control Points (CCP's). CCP's should be identified on the schematic flow diagram, and be accompanied by monitoring protocols (frequency, critical limts) and verification per each CCP.
 - Corrective action and correction procedures shall be in place for each CCP and documented.
 - Each CCP shall be validated to ensure that the critical limits effectively control the hazard and that the process is capable of operating within the critical limit. All validation data shall be documented
 - The HACCP plan shall be reviewed annually by the HACCP team and HACCP training shall be provided annually to those individuals responsible for monitoring/verification of CCPs.

Policy 08: Food Allergen Standard 8.2: Food Allergen Control Procedures

- 1. Warehouses that <u>only store General Mills packaged products</u> shall conduct a documented assessment to determine which allergen control procedures are necessary at their location to protect against the unintended presence of an allergen.
- 2. Based on the results of the assessment each warehouse shall develop and document allergen control procedures specific for their location. The assessment and documented control procedures shall be reviewed by General Mills Quality designate or regional equivalent.
- 3. At minimum, the warehouse shall have a spill procedure, a procedure for segregating damaged/leaking product and training on these procedures.

- 4. Warehouses that <u>only store and re-package* General Mills packaged products</u> shall conduct a documented assessment (using **General Mills FSRM Procedure 8.2.2**) to determine which allergen control procedures are necessary at their location to protect against the unintended presence of an allergen.
- 5. Based on the results of the assessment each facility shall develop and document allergen control procedures specific for their location.
- 6. The assessment and documented control procedures shall be reviewed on an annual basis by GMI Quality Manager or designate or regional equivalent.
- 7. **Repackaging** is when fully packaged consumer units are separated from their original shipping containers and reconfigured with other packaged products into new outer packaging containing allergen and/or ingredient information. This also includes stickering of product for language (over ingredient statement or allergen listing). If shipping units are reconfigured, such as creating a 'rainbow pallet' or when damaged shipping units are removed, this is not considered re-packaging.
- 8. If warehouse handles exposed food during regular packaging activities it must then comply with full allergen program as specified by General Mills. Contact a General Mills Quality Manager for more information.

Policy 11: Agriculture Pesticide Use and Raw Grain

- 1. In Raw Agriculture warehouses, an integrated pest management (IPM) program including maintenance, sanitation and pesticide management shall be in place. These programs shall be approved by the Quality Manager or Grain Operations, and be consistent with General Mills intent to use the least amount of the least toxic, but effective, pesticide available.
- To protect Grain...
 - o Floors shall be kept clean
 - o All chemicals shall have designated secure storage areas.
 - o Tools and equipment shall have designated storage areas.
 - Overhead equipment, structures, and fixtures shall be kept substantially free of buildup to eliminate potential pest harborages.
 - Accumulation in periphreal areas shall be removed on a timely basis to prevent pest harborage or other unsanitary condition.
 - Walls, floors, ceilings, conveyors, spouting, bins, doors, and windows shall be kept in good repair with periodic cleaning.
 - The frequency of bin cleaning shall be determined based on risk assessment of the bin type, ability to adequately inspect, and history of issues.
 - Facility boundaries shall be clearly defined, identified, and controlled. Boundaries shall be kept substantially free of grain spillage, trash or litter, weed growth, equipment debris, or other conditions which may serve as pest attractants or harborage.
- 2. General Mills grain shall be monitored at a frequency sufficient to properly identify potential issues.
- 3. General Mills grain streams shall be sampled and examined for evidence of insect infestation, rodent excreta, shally or sour odors, molds and fungi, temperature and moisture content. Sampling frequency shall be determined and adjusted based on monitoring results. If any objectionable conditions are noted upon examination of General Mills grain, General Mills shall be notified and appropriate action shall commence promptly.

Policy 12: Product Donation

- 1. General Mills donated products shall be safe for human consumption and use.
- 2. General Mills donated products shall comply with the receiving location's applicable laws and regulations for product donations.
- 3. General Mills products approved for donation shall only be donated to GMI approved organizations.
- 4. General Mills product donations shall include label information, be traceable, and be handled in a manner that ensures product safety.

Policy 13: Control of Physical Hazards and Foreign Material

- 1. Packaging materials with food contact surfaces as well as finished product and ingredients shall be protected from contamination during transfer and storage.
- 2. Warehouses shall minimize the use of glass, brittle plastic, and ceramic within storage areas, and protect it where it is used.
- 3. Warehouses shall perform a documented inventory and inspection of necessary glass, brittle plastic, and ceramic components located in storage areas at a risk based frequency to prevent contamination of products including procedures in the event of breakage or damage.
- 4. Personnel who are involved with the handling of glass, brittle plastic or ceramic in warehouse shall receive documented training on associated hazards and procedures.
- 5. Light bulbs shall be protected against breakage.
- 6. Fluorescent and incandescent bulbs shall be safety coated, or enclosed within protective covers or fixtures.
- 7. Peeling, cracked or damaged coatings shall prompt immediate replacement. Protective covers and fixtures shall be maintained in good condition, without breaks or cracks.
- 8. If the warehouse manages exposed food additional precautions shall be taken to protect against physical hazards and foreign material.
- 9. If warehouse performs X-ray or metal detection on closed food containers, additional requirements can be found within General Mills policies.

Standard 14.2: External Warehousing

- 1. Warehouses shall have current, effective, and documented programs/procedures to assure compliance to this General Mills Global Warehouse Quality Manual.
- 2. Warehouses shall promptly notify General Mills of following situations:
 - All potential food safety and regulatory compliance issues that may impact General Mills product.
 - All food governing regulatory agency contacts regardless if it involves General Mills products.
 - Other contacts (e.g. media, non-food governing regulatory agencies) that may impact General Mills.
 - Other events that may have significant business impact.
- 3. When requested by General Mills, all warehouses shall provide access to documentation, products, raw materials, and facilities involving General Mills products.
- 4. Warehouses shall perform a monthly internal self-inspection. Corrective actions shall be taken to close gaps identified. Results to be shared with General Mills upon request.
- 5. Warehouses shall perform an annual review of programs to assure compliance to the General Mills Food Safety and Quality requirements. (See Warehouse Verification/Audit checklist template). Corrective actions shall be taken to close gaps identified. Results shall be shared with General Mills upon request.

Policy 15: Food Defense

- 1. Warehouses shall have a food defense program to manage the risks of intentional acts of tampering.
- 2. The food defense program shall include the following:
 - o Develop, implement and maintain a documented food defense plan containing the following:
 - Facility profile overview of facility product stored at facility, number of employees, building access/map, etc...
 - Assess where & how risks of intentional tampering might occur at the warehouse
 - Determine what mitigation strategies can be put in place to lessen risk of intentional tampering
 - List of emergency contacts if mitigation control is breached and/or there is reason to suspect intentional acts of tampering
 - Have FDA registration number (for facilities storing product in the US)
- 3. Personnel policies shall be in place to assure persons performing work within the warehouse do not pose risk of intentional harm. (example may include background or drug screen as part of hiring process)
- 4. Develop, implement and maintain food defense training upon hiring and annually thereafter
 - a. Depth of training shall depend on the role of the individual in the mitigation strategies to prevent risk of intentional tampering. At minimum, employees should be trained to report suspicious activity.
- 5. Physical security measures shall be in place to reduce risk of unauthorized access to food or food contact packaging.
 - a. All entry points for people and food should be controlled. (Note this includes full trailers in the yard which shall be secured in a manner that prevents tampering or unintended removal from the site.)
 - b. Employees and visitors to the warehouse should be readily identifiable. Also, limit truck driver access so they can not access the food within the warehouse.

- 6. All suspected, threatened or confirmed acts of tampering shall be responded to immediately and reported accordingly.
- 7. Annually, a cross functional team of people including human resources and operation management shall meet to review (and update as needed) the food defense program. (Document when you last met as a team.)
 - a. Confirm the mitigation strategies are in place and functioning as designed

NAR Addendum

The following requirements are per General Mills Logistics Product Safety Team (GMI LPS) – For USA/Canada warehouses using SAP

Policy 02: Product Control Traceability Recall / Withdrawal

- 1. Traceability programs at each facility shall be challenged through a traceability test/mock recall at a minimum of once per year.
- 2. Mock recall shall test one step back from the facility (i.e. origin of inbound material) and one step forward from the facility (i.e. destination of outbound material). All mock recalls shall be documented including:
 - a. Identification of item traced (i.e. ingredient, finished product)
 - b. Time for completion
 - c. % of raw materials recovered
 - d. % of finished product recovered
 - e. Key learnings, gaps, discrepancies, corrective actions, and system improvements needed to meet target criteria of (a) 4 hours or less (b) 100% recovery of material.
- 3. NOTE: Documentation essential for traceability may include: Receiving Records, Pallet Identification, Shipping records, Ship receipt discrepancy/reconciliation, Hold Orders & Disposition, Special Pack, Donation, Destroy, Dump.
- 4. Ship/receipt documentation must be retained per corporate retention requirements (eleven years).
- 5. General Mills reconciliations (product trace) associated with Market Action (Recalls and Withdrawals) shall be executed, per General Mills request, within 99-102% of production and completed within 24 hours. Any warehouse owned gaps shall be resolved in a timely manner.
- 6. General Mills organic trace audits shall be executed, per General Mills request, within 99-100% of production and completed within 24 hours. Any site owned gaps shall be resolved in a timely manner.
- 7. No semi or finished product inventory shall be managed outside the General Mills' SAP system and the local inventory management system of the site.

- 8. A process shall exist to ensure warehouse inventory management system (WMS) and General Mills SAP inventory are reconciled.
- 9. For batch managed materials (where the inventory system captures the material and the code date) reconciliation shall occur at the code date or lot level.
- 10. In addition to daily inventory reconciliation between the local inventory management system and the General Mills SAP system, storage locations shall conduct a physical cycle count every 90 days.
- 11. The cycle counting process shall include the physical verification of material code, code date, and quantity across each storage location. Any discrepancies between the physical count, the location inventory management system and the General Mills SAP system shall be investigated and resolved within one business day.
- 12. Master data (such as dimensions, weights, green light flag where applicable) impacting inventory accuracy and control shall be identified and maintained by a site process owner. The master data in the location inventory system must match up with the General Mills SAP system.
- 13. A Business Continuation Plan (BCP) shall exist to ensure that inventory control and traceability is maintained during system outages and tested annually.
- 14. For warehouses repackaging or re-stickering product, procedures shall exist to deliver materials to the repackaging/re-stickering area in a timely and accurate manner that supports the Bill of Materials (BOM) and production sequence. There shall be visual control to ensure the right amount of product is staged for consumption and that consumption accuracy against the BOM is maintained.
- 15. The quantity shipped of each material and code date shall be recorded on the shipping facility's loading order or warehouse management system report for all product shipping from a facility on behalf of General Mills, including interplant and customer shipments. Full product codes shall be noted on the shipping documents.
- 16. One code date for each pallet shall be identified on the shipping record when loading a full pallet.
- 17. Mixed pallets shall contain a placard for EACH code date contained in the pallet. The placard shall contain the item number, code date and quantity. A method shall exist for accurately tracking mixed code date pallets. For quantities less than full pallet, the number of shipping units retrieved from the pick areas shall be noted for each code date shown for recall reporting documentation.
- 18. Code date pallets shall use the standard GMI Mixed Pallet Placard and contain one license plate number (LPN) for each code date.
- 19. Procedures shall exist for rework and recoup to ensure lot integrity is maintained and recorded in warehouse inventory management system and the General Mills SAP inventory management system.
- 20. Age management procedures (re-warehousing, storage location code date window, etc.) shall exist to support customer shippable shelf life requirements and to minimize write-offs associated with aged product.
- 21. Procedures shall exist for refeed and rework processes to ensure proper lot control and recording practices. Code date integrity shall be maintained between the consumable unit and the inner/outer packaging, case, and pallet.

Per General Mills Logistics Product Safety Team (GMI LPS) - For USA/Canada warehouses using SAP

FINISHED GOODS & SEMI-FINISHED GOODS:

Information required on the Bill of Lading (BOL) for INTERPLANT orders -

	Description	Comments
1	Shipping/BOL Number	Number starts with 3 or 5 (excluding leading zeros)
2	Delivery Number	Number starts with 2 (excluding leading zeros)
3	Ship from Information	Name and address
4	Ship to Information	Name and address
5	Carrier Information	Carrier Name or SCAC Code
6	Total Quantity	
7	Total Weight	

Additional information required on either BOL or separate Packing List/Tally Sheet*:

	Description	Comments
8	GMI Material Number	This is NOT the UPC code
9	GMI Code Date in the format of	DD = Day of Month
	DDMMMYYYYPP OR	MMM = Month abbreviation (Jan/Feb etc.)
	DDMMMYPP	YYYY = 4-digit year
		Y = last digit of 4-digit year
		PP = 2 letter production source code
10	Quantity shipped for each	
	material/code date	

^{*}If separate Packing List/Tally Sheet is being used, it should be STAPLED to the receiver's copy of the BOL

Information required on BOL after truck is loaded and sealed:

	Description	Comments		
11	Trailer Number	Identifying information for carrier's trailer		
12	Seal Number			
13	Carrier Agent/Driver's	Completed once truck is loaded and sealed to		
	Signature and Date	confirm transfer of ownership		

Information required on BOL after load has been received

	Description Comments		
14	14 Receiver's signature Stamp can be used with space for signatur		
		date. Do not write over required information.	

<u>3 copies of the Bill-of-Lading</u> are required at point of shipping with driver signatures/dates on all copies. Upon confirmed receipt, receiving location personnel affix signatures/date on both copies from driver.

1.) Shipping location files

- 2.) Driver keeps for carrier files
- 3.) Receiving location files

RAIL CAR / INTERMODEL SHIPMENTS:

- 7. The outbound paperwork should be placed inside the door of rail car or intermodal trailer. If there is not a specific place for the paperwork in the container, then attach paperwork to the last pallet. This paperwork will have adequate documentation to validate container ID number and the original seal for product chain of custody purposes.
- 8. In the case of an intermodal shipment, this paperwork will not be the original paperwork containing the driver's signature. If original signed copies are needed on an exception basis for audit purposes or to facilitate the claims process, a copy of the original can be provided by the original shipping location.

Note: Retention period for BOL documentation is 11 years.

- 1. **Per General Mills Logistics Product Safety Team (GMI LPS) For USA/Canada warehouses using SAP** Mock hazardous holds shall be conducted a minimum of 1/yr unannounced (best practice is quarterly) by each facility to assess the facility's ability to contain hold product accurately and in a timely manner. Additional work may be needed if poor results. Any failure requires a retest.
- 2. Within $\underline{4}$ hours of identification and communication of the substandard material code and lot/code date, the material shall be on hold at the warehouse
- 3. Hazardous holds require a weekly verification comparing the physical inventory (material code, code date, quantity) against the warehouse management system and HiFi (GMI Hold It Find It system supporting hold management).
- 4. The Hazardous Hold Critical Task List shall be followed and documented for each hazardous hold.
- 5. Process and technology gaps shall be identified and resolved in a timely manner.
- 6. Any trailer containing hold product should be segregated to prevent unintended carrier pickup, sealed, and secured. Hold product is reflected as Blocked Stock in SAP and as non-available inventory at the site level WMS (warehouse management system).
- 7. Proper electronic controls shall exist to prevent allocation to an outbound order. All production should be captured in the hazardous/non-hazardous holds. This should include recoup and damaged. All inventory We need to make sure it is not only in GMI SAP system but also in local WMS (warehouse management system) physical location.
- 8. Any hold inventory involving special pack product will require a reconciliation of the special pack components against the finished product to ensure that all suspect material is accounted for.
- 9. Every facility should have a site level process owner to ensure the timely execution of the disposition of hold product. (GMI issues the disposition but facility needs to act on this disposition in a timely manner)
- 10. Any hold greater than 60 days requires an escalation process with ultimate approval from General Mills Quality. Correct item number/code date/quantity must be dispositioned (matching the amount held).
- 11. For destruction, best practice is to keep hold placards on pallets until the destruction point. If hold product is intentionally shipped to another physical storage location, each hold pallet must be placarded while under shipment. Additional control requirements must be met as noted in the Hazardous Hold Management RACI.

Standard 4.2: Receiving

The following data elements will be entered into GMI's SAP system in a timely manner:

Data Element	Description	GMI SAP Reporting Timeliness
Production	Receipt from production	2 hours
Interplant Receipt	Receipt from site internal to GMI	2 hours
Receipt from vendor PO	Receipt of vendor purchase order	2 hours
Interplant Shipment	Shipment going to site internal to GMI	2 hours
Customer Shipment	Shipment going to GMI customer	2 hours
Customer Return	Return product received from GMI customer	same day
Donation	Donated to charitable organization	same day
Destruction	Destroyed on site or sent to landfill	same day
Animal Food	Shipped to authorized animal food program	same day
Usage	Converted to another product	2 hours
Refeed	Refed to another product or code date	same day
Add/remove from hold	Moving product from available status to hold status and visa versa	same day
Correcting interplant shipments	Corrections on shipments internal to GMI due to overweight, diversion, or site errors	same day
Customer shortage/overages	Corrections on GMI customer shipments due to shortages or overages	same day
Stock adjustments	Stock or cycle count adjustments made to correct inventory	same day

Policy 4.3: Shipping

- 1. There shall be a process to ensure the master data information associated with each customer is timely and accurate in order to meet customer expectations and maintain proper age control. Local warehouse management system needs to be accurate and capture correct information for customer shipping/requirements. Warehouses must understand what customer shippable shelf life expectation is and meet this. Inventory contained on outbound trailers / vessels that are under the site's control must be reflected in ERP inventory.
- 2. Kosher and halal-certified ingredients shall be shipped bearing the appropriate kosher or halal symbol or other documentation as required by the vendor's certifying agency and as indicated by kosher or halal certificate.
- 3. For product that is under a positive release test, Green Light or Quality Incubation, procedures will be used to ensure that product does NOT ship to customer and visibility exists in GMI SAP system as to the status of the inventory.