

# **GLOBAL BROKER MANUAL**

**Version 3**

**May 20, 2022**



**External Quality Management**

## GENERAL MILLS GLOBAL BROKER MANUAL CONTENT

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As part of the ongoing focus on our Supplier Food Safety and Quality Program, this Manual has been established to set requirements for vendors of ingredients and packaging materials to General Mills, other than the manufacturer. Within the scope of this program are:

1. Brokers
2. Agents
3. Distributors
4. Traders
5. Importers

Definitions are in Appendix B.

For brevity, this manual will be referred to as the **Broker Manual** and all the vendor types within scope will be collectively called **Brokers**. The **Product** as it relates to this manual means both Ingredient and Food-Contact Packaging materials traded by the Broker.

The overall objective of the Broker Program is to assure quality specifications conformance, product safety and regulatory compliance throughout the Supply Chain. Brokers play a critical role linking General Mills to our supplier's manufacturing facilities. This manual sets forth the General Mills Food Safety and Quality requirements and provides a detailed overview of these requirements, expectations on communication of changes and processes for approval and maintenance of suppliers. As the activities and services provided by brokers may vary considerably, some requirements from this Manual may not be applicable to all vendor types. All brokers are required to comply with the following minimum requirements:

- Brokers shall ensure materials supplied to General Mills comply with applicable regulations for the country of manufacture of the material and country of sale of the material.
- Brokers shall purchase materials used in General Mills products from supplier locations and lines that are approved by the General Mills Food Safety and Quality Director of External Quality Management (XQM) or designate.
- Brokers shall disclose all supplier manufacturing locations and lines to General Mills. The broker shall seek approval from General Mills when there is any change in the material specification or supplier locations or lines.
- Brokers shall ensure suppliers comply with General Mills requirements as written in General Mills material specifications and General Mills Ingredient Supplier Manual or Packaging Supplier Manual.

Some requirements in this manual are taken verbatim from BRC Agents and Brokers Standards.



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## **GMI BROKER COMMUNICATION OF CHANGES**

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All Brokers shall have a program that assures appropriate and timely communication to General Mills of any changes that may affect General Mills product specification, food safety and quality or composition of the ingredients or packaging materials that are supplied. GMI approval shall be granted prior to implementation of changes. Examples of these changes include:

- New producing line or location.
- Changes to a facility Critical Control Point (CCP).
- Introduction of new allergens to previously approved producing lines for GMI.
- Company name change (GMI Notification Only).
- Formulation or label change.
- Structure change or other change to packaging material.

For packaging materials, for any temporary change, an XQM-approved exception decision shall be in place. For any permanent changes, GMI XQM and R&D teams shall both approve any changes prior to implementation. GMI may request further testing from the vendor to verify that key specification requirements are still met by the new material.

## **GENERAL MILLS AUDIT PROGRAM**

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Brokers shall purchase materials used in General Mills products from supplier locations and lines that are approved by the General Mills Global External Quality Management (XQM) Team. As part of the GMI Supplier Management Program an assessment is required for a new production location/line and/or transfer stations to ensure the supply location/line can meet GMI requirements and demonstrate an effective food safety culture. All approved vendor/supplier producing locations for GMI will be re-audited on a risk-based frequency.

If food safety and regulatory audit of a supplier producing location or line cannot be completed by a qualified XQM audit or a second party that is approved by XQM, a broker audit according to the requirements of this manual shall be used as an option.

The audit of the Broker will be conducted for specific products wherever product safety and quality systems can be assessed effectively, typically at the Broker's head office. In some cases, virtual audits may be performed. Relevant documentation shall be provided upon request by the Broker. The audit and corrective action shall be documented in G-GAP system (General Mills Audit Program).

For Brokers, 3rd party certifications such as GFSI schemes (British Retail Consortium BRCGS Agents and Brokers, IFS Brokers, SQF 2000, FSSC 22000) are recommended but not required. If certified, approved Brokers shall provide General Mills with a third-party audit report annually.

Above mentioned document can be sent to one of the following email addresses:



North America (human food ingredient suppliers): [supplier.documentation@genmills.com](mailto:supplier.documentation@genmills.com)

Outside North America (human food ingredient suppliers): [XQM.Support@genmills.com](mailto:XQM.Support@genmills.com)

Pet food ingredient suppliers: [supplier.documentation@bluebuff.com](mailto:supplier.documentation@bluebuff.com)

All 3rd party audits will be reviewed and additional follow up may be required. In addition, periodic audits by General Mills may be conducted along with requests for documents for ongoing maintenance. A risk assessment will be conducted to determine the frequency of maintenance audits.

## **NON-DISCLOSURE AGREEMENTS AND CONTRACTS**

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Brokers may require confidential information non-disclosure agreement (NDA) with General Mills. Irrespective of an NDA, formulas and supplier information needed by General Mills to comply with regulatory requirements shall be provided by the Broker.



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## REGULATORY COMPLIANCE

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The Broker shall have processes in place to ensure that the products traded comply with the legal requirements in the country of manufacture and sale.

- The Broker shall have documented processes to verify the regulatory status of products which are traded. Where Broker is purchasing the raw materials overseas, the foreign supplier shall comply with all applicable laws, regulations or ordinances of any governmental authority that regulates the import or export of goods and services provided by the foreign supplier, and all reasonable requests from General Mills as to the form and manner of such compliance. Such compliance activities shall include, but not be limited to:
  - Proper marking of the country of origin of goods
  - Provision of all documentation requested by General Mills or as otherwise needed for compliance (e.g., country of origin certificates, complete product description on invoice)
- Where required by legislation, the Broker shall be registered with, or be approved by, the appropriate authority. All relevant government-issued licenses shall be current.
- The Broker shall have a procedure to handle regulatory contacts and samples, including notification of General Mills.

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## REGULATORY CONTACTS

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- Brokers shall have a written policy detailing the procedures and responsible persons associated with a regulatory contact and facility inspection.
- The facility shall keep accurate records detailing regulatory agency visits and the resolution to all findings documented by the regulatory agency.
- All Brokers shall notify GMI food safety contact when any significant regulatory findings are made.
- Regulatory contact training shall be documented and shall occur on a frequency that ensures appropriate individuals have an understanding of current, local, and corporate procedures for managing regulatory contacts.

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## REGULATORY SAMPLING

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- Duplicate samples shall be taken anytime regulatory samples are pulled along with clear documentation of what is to be tested. This may include duplicates for finished product pathogen testing, pesticide testing, etc.
- A hold and positive release program shall be in place to accompany regulatory sampling with written clearance by the sampling agency prior to disposition. If a hold and positive release program is not feasible, GMI shall be notified in advance and a written approval from GMI food safety contact shall be obtained.
- Product that has been sampled and partially shipped or in regulatory hold while in transit to GMI must be communicated to the appropriate GMI food safety contact immediately to ensure hold and clearance prior to use.



When an ingredient or packaging material, either owned by or being shipped to General Mills, is sampled by any regulatory/government agencies at any point during storage or transportation, the General Mills food safety contact shall be informed. In all these events, General Mills shall be notified of the lot numbers of materials that were sampled by the regulatory/government agency. If any documents showing General Mills as a customer is shared with the regulatory/government agency, General Mills shall be notified of the documents reviewed and additional information that is relevant to these documents (e.g., Lot codes, PO #'s etc.).

## **TRACEABILITY, RECALL AND NON-CONFORMING PRODUCT CONTROL**

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### **PRODUCT TRACEABILITY**

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The Broker shall have the ability to trace all product lots back to the last manufacturer and forward to General Mills. The Broker shall also ensure that its suppliers have an effective traceability system which includes periodic verification as described in the Ingredient Manual and Packaging Manual.

- The Broker shall maintain a traceability system for all lots of product which identifies the last manufacturer or, in the case of primary agricultural products, the packer or place of last significant change of the product. The traceability system shall include clear identification system for product such as the use of defined date codes and lot numbers.
- Where product is re-labelled or reworked by or on behalf of the Broker, or returned by customer, traceability shall be maintained.

### **PRODUCT WITHDRAWAL AND RECALL**

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The Broker shall have a documented and effective product recall, market withdrawal, and stock recovery program. The Broker shall have a plan and system in place to effectively manage incidents and enable the effective withdrawal and recall of products should this be required.

- The Broker shall have a process to enable its subcontractors and suppliers to report incidents and emergency situations that impact product safety, quality and regulatory compliance.
- The Broker shall have documented procedures to report in a timely manner and effectively manage incidents and emergency situations that impact product safety, quality and regulatory compliance to their customers, regulatory authorities and other relevant bodies. The procedure shall include:
  - identification of key personnel in the recall management team, with clearly identified responsibilities
  - guidelines for deciding whether a product needs to be recalled or withdrawn, and records to be maintained





- an up-to-date list of key contacts or reference to the location of such a list, e.g. recall management team, emergency services, suppliers, customers, certification body, regulatory authority
- a communication plan including:
  - the provision of information to customers and regulatory authorities in a timely manner
  - instructions for customers on the return or safe disposal of recalled product
- details of external agencies providing advice and support as necessary, e.g. specialist laboratories, regulatory authority and legal expertise
- a plan to handle the logistics of product traceability, recovery or disposal of affected product and stock reconciliation
- The Broker shall have an annual Mock Recall Program in place that identifies gaps in the Broker's ability to trace one step back from receipt (from supplier) and one step forward from shipping (acceptance by General Mills). The Mock Recall shall include a traceability test which entails the reconciliation of quantities of product received by the Broker for the chosen lot (GMI's recommendation is 100% recovery of materials). It is recommended that traceability be achievable within 4 hours (or 24 hours if information is required from external parties or an extension office). A summary results of mock recall (items traced, time for completion, % recovery), key learnings and system improvement needs shall be included in the mock recall. A documented corrective action shall be in place to address the gaps identified.

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## CONTROL AND DISPOSITION OF SUBSTANDARD PRODUCT

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The Broker shall ensure that any substandard product is effectively managed to prevent accidental release to General Mills. The Broker shall also ensure its supplier has an effective control of substandard materials.

- There shall be documented procedures for managing products which do not conform to buying or General Mills specification. This shall include:
  - a process for subcontractors handling the product to report potentially substandard product
  - clear identification of substandard product to prevent release, such as physical tagging and use of electronic systems
  - agreed procedures with subcontractors for secure storage to prevent accidental release or shipment
  - a process that ensures only authorized personnel disposition hold products and disposition instructions are followed. Examples of disposition include acceptance by concession, re-designation to an alternative customer, reworking or destruction. Records of the disposition on the use or disposal of the product shall be maintained.
  - additional controls for the security of hazardous non-conforming product (food safety issues) such as:
    - dedicated, locked storage
    - minimum of 2 of the following 3 movement controls: electronically secured, physically secured/locked, and manually isolated/segregated



- physical inventory (recommended inventory counts for hazardous hold materials is at least once a week)
- records and witnessing of destruction of hazardous product
- a process for handling products that are on hold for multiple reasons

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## **GOOD MANUFACTURING AND STORAGE PRACTICES**

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The Broker shall implement programs to prevent contamination and adulteration of products while in their control, including products handled by subcontractors.

The Broker is also responsible for ensuring its suppliers' manufacturing locations develop and implement an effective, documented sanitation and GMP program in compliance with the requirements of the Ingredient Manual and Packaging Manual.

The following practices state the minimum requirements to be followed unless applicable laws or regulations have more stringent requirements, General Mills requirements shall supersede local customs or practices.

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### **PERSONNEL HYGIENE PRACTICES (EMPLOYEES, CONTRACTORS, TEMPORARIES, VISITORS)**

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- The management team shall develop effective personnel and hygiene practices and procedures for the Broker's facility.
- Personnel hygiene and food handling training and education program shall in place. Personnel shall receive training prior to performing any work or services and refresher training at a regular basis (recommended once per year). Completion of training for each person shall be documented.
- Health policy shall be in effect to prevent spread of infectious or communicable diseases. Disease control procedures shall comply with applicable laws and regulations.
- Compliance to general cleanliness practices and wear clean outer garments, and personnel protective equipment as appropriate.
- Compliance to documented personnel hygiene procedures.

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### **OPERATIONAL AND STORAGE PRACTICES**

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- Packaging and ingredients shall be received, stored and used so as to prevent contamination.
- For unitized material, adequate perimeter shall be maintained in warehouse and storage areas to allow inspection and cleaning (recommended space: 18" /45 cm).
- Physical storage conditions shall be maintained to ensure material integrity.
- Storage surfaces and racking shall be clean and in good condition.
- Waste materials shall be identified and adequately controlled.
- Raw and finished goods shall be stored separately.



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## FACILITIES, EXTERIOR GROUNDS AND UTILITIES

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- Grounds and exterior structure shall be designed and maintained to provide protection from environmental elements, pest entry and harborage, trash and debris.
- All entrances to the buildings shall be properly sealed and/or screened at all times.
- Doors, windows and wall-mounted fans shall be closed and/or screened to prevent pest entry.
- Ventilation system shall be adequate to minimize condensation and airborne contamination from aerosols or fumes and prevent pest entry.
- Roof shall be accessible and well maintained.
- Interior structures shall be designed and maintained to be impervious and cleanable.
- Facility shall be maintained to be free from loose paint, rust and/or other debris that may contaminate product zones.
- Hand wash stations shall be adequately located and maintained in good repair.
- Facilities shall provide adequate natural and/or artificial lighting that meets applicable laws and regulations and enables personnel to operate in a safe and sanitary manner. All lights in product handling and storage areas shall be shielded with protective covers or are shatterproof.
- Water leakage and/or condensation shall be controlled to prevent product contamination or microbiological hazards.
- Traffic patterns of people, machines and materials shall be controlled to prevent contamination.

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## EQUIPMENT AND MAINTENANCE

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- An effective preventive and corrective maintenance program shall be in place.
- Product zones and adjacent areas shall be thoroughly cleaned and inspected following completion of maintenance or repair.
- Lubricants shall be designated for use and adequately controlled.
- A calibration program shall in place for all critical equipment that ensure product safety and regulatory compliance.

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## CLEANING

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- An adequate, documented cleaning program shall be in place to cover daily and other regular tasks to ensure the environment are maintained in sanitary condition.
- Procedures should be in place to verify effectiveness of cleaning procedures.
- Documented chemical control program shall be in place including approved chemical list, inventory control, preparation and usage.
- Any person involved with cleaning activities shall receive documented training on cleaning procedures specific to their facility and job function.
- Broker's facilities shall have an effective drain cleaning and sanitizing schedule to prevent drains from being a source of contamination of environmental pathogens or infesting insects and to reduce the risk of cross-contamination from drains to receiving/shipping or storage areas. Drain cleaning/sanitizing tools shall be dedicated and properly identified.



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## INTEGRATED PEST MANAGEMENT

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- An effective, documented pest control program (rodents, insects, birds and wildlife) shall be in place.
- Program shall be supported by a licensed, certified applicator or trained staff and include only certified pesticides in compliance with country regulation.
- Toxic bait shall not be used inside handling product areas (e.g., in warehouse, storage areas, etc.).
- Monitoring results, trends analysis and findings shall be evaluated to determine effective short-term and long-term corrective actions and proactive prevention.
- When mechanical stations and glue boards are used, an increased monitoring frequency is recommended.

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## FOOD SAFETY ASSESSMENT

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Facility's Internal/Self-Assessment Audit Program shall include GMP inspection and food safety and regulatory program verification. Internal audits shall be carried out by appropriately trained competent auditors, who are independent from the audited activity. Observations/findings/gaps and corrective actions resulted from these inspections shall be documented. Corrective actions and timescales for their implementation shall be agreed and completion of the actions verified.

Facility GMP inspections shall meet the following requirements:

- Inspections shall include observations of facility condition and employee behaviors in regard to all components of Good Manufacturing Practices.
- Inspection frequency shall be documented and occur at the minimum set frequencies (GMI recommendation is monthly).

Food safety and regulatory program verification shall occur on an annual basis and shall meet the following requirement:

- Program verification shall include review of the facility's written programs to assure compliance with applicable food safety and regulatory as well as GMI requirements.

It is recommended that a third party complete a regulatory, product safety and quality management systems audit annually.

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## CHEMICAL CONTROL

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- Procedures shall be in place to manage chemicals so as to prevent contamination of products and safety incidents.
- Documented chemical control program shall be in place including approved chemical list, inventory control, preparation and usage (chemicals for cleaning, maintenance and stored pesticides).



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## WATER INGRESS PROGRAM

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It is required that the facility has a documented water ingress program including:

- Procedure for handling unexpected water ingress including segregation, product evaluation, clean up, documentation, corrective action, etc.
- Procedure to divert roof leaks and timeline within which to execute permanent repairs.
- Evaluation of potential sources of water ingress from roof leaks, condensation, sewer back-up, flooding, fire-sprinkler, other plumbing leaks, etc.
- Documented training on associated hazards and procedures for personnel who are involved with the handling of water ingress.
- Preventative maintenance program for roofs to ensure roof repairs are completed.

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## TRANSPORTATION AND LOGISTICS

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The Broker shall ensure products are protected from contamination and damage during transportation.

The Broker is responsible for ensuring its subcontracted transport service provider or its suppliers' vehicles and containers meet GMI requirements and applicable laws and regulations.

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## RECEIVING

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All products, ingredients, packaging materials shall be received in a manner that protects and assures the safety and quality of the material, complies with applicable laws and regulations, and does not introduce any product safety hazard to the receiving location.

This section states the minimum requirements to be followed as defined by General Mills unless applicable laws and regulations have more stringent requirements.

- Receiving documents of all shipments shall be maintained by the warehouse and include date received, shipper, vehicle numbers, description of contents and confirmation that all seal numbers were intact with contents verified to match the load documentation.
- Prior to unloading, all vehicle openings and security seals shall be inspected for damage or tampering by a trained employee or an authorized third party designate. All security seals shall be intact, and seal numbers shall be matched to the "Bill of Lading" (BOL) or "Delivery Note". Inspection and results shall be documented.
- There shall be a procedure in place in case of broken seals.
- A documented inspection shall be completed of all incoming vehicles and shipments to assure the quality and integrity of the shipment. Incoming cars or trucks shall be inspected for evidence of contamination. The content and identification of the vehicle shall be verified as correct and match the Bill of Lading prior to acceptance.
- If required, temperature of inbound shipments shall be checked before unloading and results documented.
- There shall be a documented program for rejected incoming loads/ materials.
- Sampling of ingredients or other materials shall be carried out in a manner which will not contaminate the material or load.



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## GMI REQUIREMENTS FOR VEHICLES AND CONTAINERS

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Transportation vehicles and containers used for transporting GMI ingredients and packaging shall comply with applicable laws and regulations and minimum requirements defined by GMI as stated below:

- Prior to loading and shipping, all means of transportation used for transport of GMI ingredients and packaging shall be thoroughly inspected and cleaned as necessary to protect integrity. Vehicles shall be inspected for damage and signs of contamination prior to loading. Exterior surfaces of the vehicle must be clean. These inspections shall be documented, and records retained.
- Shipping documentation shall be maintained and include seal numbers, origin and destination points, code markings and other appropriate details.
- If required, temperature of outbound vehicles shall be checked prior to loading.
- Vehicles and containers used to transport General Mills ingredients and packaging shall be:
  - In good, safe, and lawful operating condition for transportation of food grade merchandise.
  - Used only for food grade materials. Feed grade merchandise transportation is acceptable for pet food ingredients suppliers only.
  - Clean, odor-free, and leakproof.
  - Free of contamination and infestation.
  - Made of food grade materials for direct food contact surfaces.
  - Capable of being tightly sealed to adequately protect the contents and prevent contamination.
  - Fully functional and calibrated temperature gauge to maintain specified temperature (temperature-controlled vehicles only).
- For suppliers based in North America, roll top, soft sided or open top trucks shall not be used for shipment of food products or ingredients to GMI. Exceptions are available for commodity type purchased ingredients as designated in the specification and/or the purchase order, after risk assessment and approval from GMI food safety team.
- For suppliers outside of North America, roll top, open top and soft sided trucks are allowed for transportation of ingredients when integrity of the product is maintained.
- Roll top and soft sided trucks are allowed for transportation of ingredients for use in pet food products.
- Open-topped or canvas-topped vehicles are unacceptable for shipment of packaging materials to GMI. Allowances may vary by region with approval by XQM Team based upon risk assessment. If roll top, soft sided, or open top trucks are used, the shipper shall consult with XQM Team to minimize product safety risk.
- Where used upon approval for ingredients or packaging materials:
  - Roll top or soft sided trucks shall be in good condition without any holes.
  - Alternate methods may be required to secure the load of a roll top vehicle and visually inspect the goods for food defense.
- Food ingredients and packaging materials shall not be shipped in mixed loads with other non-food materials where contamination of the food ingredient and packaging materials may occur due to foreign substances, toxic materials, off-odors or other



conditions, which may render the food ingredient and packaging material unacceptable.

- Under no circumstances shall 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, etc. be used for shipment of GMI's ingredients or packaging materials even after cleaning.

In order to assure food safety, traceability, and quality, the following documentation shall be provided. Missing or inaccurate BOL information may lead to rejection of a load. Bill of Lading (BOL) or equivalent shipping documentation, minimum requirements as appropriate are:

- 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 ingredient code, weight, etc.)
- Code Markings or Lot identification
- Quantity of each Lot/Code Marking
- GMI purchase order number or invoice number
- Scheduled date of arrival
- Temperature requirement and verification at time of shipment (for temperature-controlled loads only)
- COA requirement for the load
- Weight certificate
- Fumigation dates and dosage (for in transit rail fumigation only)
- Hazardous Nature of Material, with rules and regulation governing shipping/handling of such material (e.g., MSDS for flammable flavors, etc.)
- For import into the US the GMI DUNS # of 00-625-0740 MUST be included.
- Kosher or Halal Symbol, wash certificate or other documentation as required
- Purchase, transit and delivery documentation that shall identify organic ingredient as organic.
- A "Wash Certificate" for all liquid loads and "Dry Clean" certificates for all dry bulk loads shall be available from the driver upon request. This certificate shall include information such as: vendor ID, Carrier ID, Date and time of wash, tanker ID, Previous contents, wash /sanitize method. Kosher/Halal wash certificate is required where applicable claims are made.

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## VEHICLE, CONTAINER AND MATERIAL SECURITY

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- All vehicles and containers shipping GMI ingredients and packaging materials shall be properly loaded and immediately sealed in order to minimize the risk of contamination or tampering of the load. Outbound shipments shall be sealed by warehouse personnel.
- The seal shall be a tamper evident style. The tamper evident seals' specific style and strength is the suppliers' choice, but cable seals are required on bulk rail and truck carriers. Seals on bulk trucks may be numbered plastic tamper evident style by





exception if appropriate risk considerations such as distance, no driver changes, no overnights and dropped trailers are taken into account.

- A high security seal must be affixed to all loaded C-TPAT importer containers bound for the U.S. All seals must meet or exceed the current PAS ISO 17712 standards for high security seals.
- Brokers are not required to seal common LTL's (less than truck load) carrier that is shipped outside of their control. However, all items shipped on a non-sealed carrier shall have unitized packaging that is tamper evident.
- If security seal must be broken for any reason (e.g., border crossing, weigh station) while in transit, the carrier must note the time, date, location, and reason of removal of security seal on the BOL. As soon as practically possible, the container must be resealed with the new seal number, time, date, and location of resealing noted on the BOL.
- Where the security seal is broken while in transit, due to acceptable reasons as stated above, the carrier must inform both the shipping location and receiving location of this change and receive their acceptance prior to continuing to the GMI facility for unloading. Where possible, the agency breaking the seal should reseal the container with their agency specific seal. It is the brokers' responsibility to ensure the carrier is aware that the seal can only be broken at the receiving facility by an authorized GMI employee or designate, except as noted above.
- A broken, or missing seal is a cause for rejection at the shipper's liability.

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## FUMIGATION

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- The Broker is responsible 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.
- Fumigation cannot be done between the shipper and the GMI receiving plant without prior written authorization to assure proper procedures are in place at the receiving end to allow for fumigant handling and aeration.
- Railcars can be in transit while under fumigation. Proper procedures must be in place at the receiving location to allow for proper fumigant handling and aeration.

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## PALLETIZING AND LINING

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Requirements noted in this section may be superseded by GMI's receiving plant needs. If a GMI plant has specific requirements it will be communicated to the Broker and it is the Broker's responsibility to know and comply with each plant's needs.

- General Mills follows the GS1 guidelines on pallet level bar code labeling and expects the same from suppliers for ingredients, packaging materials, finished goods, semi-finished goods and supplies (Refer to Ingredient and Packaging Supplier Manual for details).
- Prior to shipping, all shipping requirements shall be confirmed with the receiving facility (e.g. pallet type/ style).
- Ingredients and packaging materials are to be secured within the unit load. Unit shall be moveable in such a manner that the load is adequately supported and can be stacked with safety and without damage.





- Packaging materials are to be secured within the unit load to provide integrity by stretch or film wrapping. A well-secured top cover consisting of plastic wrap, corrugated slip, or solid fiber Kraft slip-sheet is required on palletized units (bags, boxes, fiber drums) to assure maximum unit protection. Dunnage and unitization packaging requirements will be negotiated plant to plant.
- Unit width should not exceed the pallet size.
- Prior to use, all pallets (wood and plastic) shall be inspected to ensure they are clean and in good condition.
- Pallets shall be in compliance with applicable laws and regulations of the receiving country.
- Slip sheets shall be used for all pallets before the items are placed on the pallet as well as when pallets are double stacked. For double stacking, slip sheets must be placed on top of lower pallet before placing the second pallet load on top.
- Total unit weight is determined by receiving facility's equipment capabilities and safety requirements. Double-stacked product should be secured to prevent shifting and damage to the load.
- All pallets should be labeled with date of manufacture and quantity of product legible from two sides. Pallets with multiple lots are to be indicated as such and the corresponding number of units and date of production listed on the pallet as well as on the bill of lading. No more than two (2) lots can be on any one pallet.
  - For pet food ingredient suppliers, no more than one (1) lot can be on any pallet and a maximum of three (3) lots can be shipped on the same truck.
- Packaging materials shipped in metal or plastic drums shall be unitized on wooden or plastic pallets. The drums shall be strapped together by a non-metallic strap or wrapped with heavy film for stability.
- Information on minimal pallet labeling requirements for supplier who send EDI 856 Advanced Shipment Notice to General Mills when shipping against a Purchase Order can be found in the Ingredient and Packaging Supplier Manual.
- Any shipments to GMI that does not comply with these requirements may be rejected.

## **CUSTOMER RELATIONS**

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### **CUSTOMER FOCUS AND COMMUNICATION**

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The Broker shall understand and clearly communicate General Mills requirements to relevant suppliers of products and services.

- The Broker shall have a system for identifying General Mills specific requirements. Specific requirements shall be made known to relevant staff within the Broker and kept up to date.
- Effective processes shall be in place for communicating General Mills requirements to the relevant suppliers of products and services. Requirements are contained in the Product Specifications, Ingredient Manual, Packaging Manual and other documents. Records shall be available to demonstrate that General Mills requirements notified to the broker have been notified to the relevant immediate suppliers and that these



suppliers have confirmed they understand the requirements and there is documented supporting evidence of their implementation.

- The Broker shall provide information to enable the approval of the last manufacturer or processor of the product. This shall include the identity of this manufacturer or processor.

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## COMPLAINTS HANDLING

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Customer contacts shall be handled effectively, and information shall be used to reduce complaint rates.

- The Broker shall have a process to receive and manage customers/consumers/ GMI's feedback related to product quality, safety, regulatory matters or technical information requests.
- Procedures shall be in place to ensure Quality Notifications (QNs)/Non-conformances from GMI are reviewed and addressed in a timely manner. All complaints received shall be recorded, investigated and the results of the investigation recorded. Corrective action appropriate to the seriousness and frequency of the problems identified shall be carried out promptly and effectively by appropriately trained staff.
- Complaints arising from the action of a service provider or supplier shall be notified to that supplier for further investigation.
- Corrective actions identified shall be agreed and the implementation confirmed with the relevant supplier or service provider.
- Broker shall perform regular reviews of non-conformances received from customers. These reviews must be documented and used to identify potential product safety, regulatory, or other significant issues and trends that may require action such as further investigation or communication. Root cause analysis shall be used for serious or frequently occurring complaints to avoid recurrence.
- Products returned to the Broker shall be managed so as to prevent adulteration and contamination.

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## PRODUCT SPECIFICATIONS AND LABELING

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### LABELING

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- Where claims are made about products handled, such as Kosher, Halal or Organic, supporting information shall be available from the supplier or independently to verify the claim.
- Where product labeling change is required by the General Mills or legislation, the Broker shall ensure the labeling of the product is amended by the supplier to meet this change. Labeling information shall be legible, indelible and shall comply with agreed product specifications. Labeling shall be checked regularly, and checks shall be documented. The Broker shall have a label control program to ensure product labels contain all required and accurate information.



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## SPECIFICATIONS

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Specifications or information to meet quality, product safety and regulatory requirements shall be maintained, controlled and made available to General Mills.

- The Broker shall have up-to-date specifications for all products supplied to General Mills. These shall either be in the agreed format of General Mills, or if not, shall include key data to meet legal requirements and assist General Mills in the safe usage of the product.
- The specifications shall be controlled by a program that includes clear accountabilities, document control (including control of obsolete specifications) and verification procedures to ensure the product being traded conforms to the correct specification. This program shall ensure the current accurate GMI specifications are available on the company's specification database, are used at all times and are available to appropriate personnel. Brokers that are supplying a "stock item" to GMI must have their specification available for review.
- The Broker shall ensure that General Mills specified requirements are met. This may be by inclusion of the requirements within their buying specifications or by undertaking further work on purchased product to meet the General Mills specification, for example, sorting, running through metal detector, or grading of product.
- The Broker shall have procedures in place to obtain approval from General Mills prior to making any changes to product, process, specifications, formulas and producing locations. The procedure shall include documented reviews whenever products, suppliers or manufacturing or packing locations change or as a minimum at least every three years. For PET specific requirements, see Appendix C.
- The Broker shall ensure that specifications exist for all packaging materials supplied to General Mills.
- Broker shall provide declaration of conformity of food-contact packaging supplied to General Mills.
- Approved specifications for all products shall be in place prior to procurement from suppliers.
- GMI will address failures of compliance to product specifications via Quality Notification and/or non-conformances process. A non-conforming product may result in an additional action by the receiving location such as partial or full rejection of the material.

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## PRODUCT TESTING AND RELEASE

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Where products require formal release by a General Mills or a regulatory authority, the Broker shall ensure that an effective product release procedure is in place, including supplier and subcontracted facilities holding products on behalf of the Broker.

- The Broker shall have a product sampling or assurance program to verify that products are in accordance with agreed specifications and meet regulatory and product safety requirements.
- Where verification of conformance is provided by the supplier (e.g. certificates of conformance or analysis), the level of confidence in the information provided shall be



supported by commissioning periodic independent product analysis by an appointed laboratory.

- Where the Broker undertakes or subcontracts testing, the laboratory or subcontractors shall have gained recognized laboratory accreditation or operate in accordance with the requirements and principles of ISO 17025.
- Test and inspection results shall be retained and reviewed to identify trends. Appropriate actions shall be implemented promptly to address any unsatisfactory results or trends, including communication with General Mills for any affected product supplied.
- Where products require positive release, procedures shall be in place to ensure that release does not occur until all release criteria have been satisfied and release has been authorized by the Broker.

## **FOOD SAFETY PROGRAM, HACCP, AND PREREQUISITE PROGRAMS**

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As necessary, the Broker shall implement a food safety plan covering operations within the segment of supply chain that it controls.

The Broker shall also ensure its suppliers have a food safety plan based upon the 7 commonly accepted principles of HACCP. The food safety plan shall meet the requirements of the Ingredient Manual and Packaging Manual.

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### **BROKER'S HACCP PLAN**

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- The person responsible for leading the hazard analysis shall be trained and competent in the understanding of HACCP principles and their application. Where a team is used, the team members shall have knowledge of the hazard and risk analysis principles. In the event of the Broker not having appropriate in-house knowledge, external expertise may be sought but the day-to-day management of the system shall remain the responsibility of the Broker.
- Where the hazard and risk analysis study has been undertaken centrally it shall be possible to demonstrate that the study has been verified to meet the specific activities of the local operations to which the study applies.
- The HACCP plan shall describe its scope in terms of the products and services that are traded. This shall include:
  - A description of the nature of products traded and any particular specified storage or handling conditions (for example temperature control requirements, propensity to water damage etc.)
  - A description of any services provided directly or through subcontractors while the product is under the responsibility of the Broker.
- A flow diagram shall be developed to describe the process from the purchase of products to acceptance of the products by General Mills.



- The Broker shall conduct a documented hazards analysis for each product and process step to identify which need to be controlled. The Broker shall consider the following types of hazards:
  - Microbiological growth (e.g. resulting from temperature abuse of products that require temperature control or exposure of unpacked products to environmental micro-organisms such as pathogens)
  - Physical contamination (e.g. glass contamination, wood splinters from pallets, dust, pests)
  - Physical damage (breakage, puncturing of packaging, water damage or electrical faults)
  - Chemical or radiological contamination (including product tainting)
  - Allergens (e.g. cross-contamination during storage or transportation of open product in silos or tankers)
  - Fraud (e.g. substitution or deliberate/intentional adulteration)
  - Malicious contamination of products
  - Hazards impacting the functional integrity of packaging materials and their performance
  - Any other hazards specified by General Mills or mandated by relevant regulatory authorities
- The company shall complete a documented risk analysis of the potential hazards in order to identify which need to be controlled. The following should be considered: the likely occurrence of the hazard, the severity of the hazard (e.g. injurious to health, potential to cause food poisoning, rejection or a product recall) and existing pre-requisite programs which effectively prevent or reduce the hazard to acceptable limits.
- For each hazard which requires control, control points shall be established to prevent, or reduce a significant hazard to acceptable limits. Significant hazards likely to cause illness or injury in the absence of control shall be designated as Critical Control Points (CCPs). The CCPs shall have defined critical limits.
- The plan shall include monitoring procedures with detailed steps, frequency, person performing the check and documentation as well as verification procedures to ensure the HACCP plan is being followed.
- A documented corrective action plan shall be in place to address deviation or loss of control at the CCPs. This shall include root cause analysis, product risk assessment and disposition, and actions taken to regain control.
- The HACCP Plan shall be formally reviewed at least annually and whenever new products are traded, new services or process steps are introduced, a new risk emerges or following a product recall, where the broker's processes are implicated. This review shall be documented.
- HACCP records shall be retained for 3 years. Records shall be complete, accurate and legible. All records shall be easily retrievable and stored in a manner that protects against loss or damage. Where records are in electronic form, these shall be suitably backed up to prevent loss.
- The Broker shall ensure that all personnel performing work that affects product safety, regulatory compliance and quality are demonstrably competent to carry out their activity, through training, work experience or qualification. The training shall be given prior to commencing work and at least an annual refresher and shall cover key topics



such as Food Safety/HACCP, Allergens, GMPs, Food Defense, Regulatory Compliance, Organic & Religious Certification and other job specific topics where applicable.

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## ALLERGENS

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The Broker and their suppliers shall implement programs to prevent allergen contamination or mislabeled product to be delivered to General Mills. The Broker shall ensure their manufacturing sites comply with requirements as written in the Ingredient Manual and Packaging Manual.

All Brokers shall develop and maintain an Allergen Management Program that effectively controls the risks associated with these allergenic ingredients: peanuts, tree nuts, eggs, milk, fish, crustacean, soy and wheat. Additional allergens or sensitizing agents may require control as regulated in the country of manufacture or country of sale for example, mollusks, mustard, sunflower seeds, sesame, sulfites, cereals containing gluten, coconut, mango, etc.

- Allergen Labeling: The Broker shall ensure that allergens are labeled and declared in their ingredient declarations in accordance with the laws and regulations of the country of manufacture or country of sale. The Broker shall also have a system in place to verify the accuracy of labels. General Mills shall be notified as soon as possible if the allergen profile changes (e.g., when an allergen is identified in a product that was not previously labeled due to new allergen information from current supplier, addition of allergen to the "contains" or "may contain" statement due to change in formulation, etc.).
- Awareness Training: A documented allergen training program shall be in place to educate all employees on the basics of the major allergens and their risks. Training shall be conducted at least annually and must be documented.

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### RISK ASSESSMENT AND MANAGEMENT – PET FOOD ONLY

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Human food allergens and associated risks shall also be identified and managed in the facilities that store ingredients for pet food. All facilities that store ingredients for pet food products shall complete a documented risk assessment for food allergens present in their facility. The risk assessment shall be documented. If additional controls are necessary based on this risk assessment, they shall be documented.

Established good storage practices and sanitation procedures, labelling, and ingredient sourcing practices are sufficient to minimize allergen risk to humans resulting from unintentional presence of an allergen in ingredients supplied for pet food products.

The Broker allergen program (which includes the allergen risk assessment and management) shall be reviewed annually, or more often, if there are changes to allergen profile. The review shall be documented.

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### ALLERGEN CONTROL PROGRAM – HUMAN FOOD ONLY

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Broker Allergen Control Program shall be a component of the HACCP program and shall consider storage practices, cleaning practices and tool and container management. All components of the Allergen Control Program shall be reviewed and updated on an annual



basis or more frequently if there are any changes in allergen risk. Reasons for a change in allergen risk level includes change in formula, allergen ingredient, allergen ingredient form, product or personnel. Based on these reviews, Broker shall determine which allergen control procedures are necessary at their location to protect against the unintended presence of an allergen and undeclared component of any product.

Brokers that handle allergens shall have an Allergen Control Program which includes the following components:

- List of allergens present in the facility.
- Allergen Management Strategies.
- Procedures for receiving, handling, and storage of allergen ingredients and products.
- Storage practices shall be in place to prevent cross contamination of allergenic ingredients with other ingredients, etc. This may include but not limited to physical segregation, dedicated storage areas, unique labels, storing materials on the lowest level.
- Allergen tool and container control program shall be in place to prevent cross contamination. This may include color coding, dedicated tools, cleaning practices, maintenance procedures, segregation and storage practices.
- Label verification procedures (refer to PRODUCT SPECIFICATIONS AND LABELING).
- Additional prerequisite programs that prevent allergen cross-contamination.

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## **BIOLOGICAL HAZARDS CONTROL**

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The Broker's shall ensure that products received from their suppliers' manufacturing sites and supplied to General Mills comply with agreed microbiological specifications. The Broker shall also ensure their suppliers comply with General Mills' requirements on microbiological hazards control as written in the Ingredient Manual and Packaging Manual.

- The manufacturing sites shall have a biological control program with appropriate ingredient, environmental, processing and finished product controls along with evaluation as part of the HACCP program and appropriate monitoring procedures.
- Materials tested for pathogens shall have positive release and the Broker shall have procedures in place to ensure that release does not occur until all release criteria have been satisfied. If product is to be shipped for clearance in transit, GMI must provide documented approval prior to shipment. General Mills shall be notified if any pathogen tests are being or have been conducted on materials that have already been delivered to General Mills.

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## **SUPPLIER MANAGEMENT**

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The Broker shall have a risk-based supplier and subcontractor management program that ensures the quality, safety and regulatory compliance of all traded products.



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## APPROVAL AND PERFORMANCE MONITORING OF MANUFACTURERS AND PACKERS OF TRADED PRODUCTS

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The Broker shall implement procedures for the approval of the last manufacturer or packer of traded products to ensure these are safe, manufactured in accordance with any defined product specifications and compliant with applicable laws and regulations.

- The Broker shall have a documented supplier approval procedure which identifies the process for initial approval and ongoing maintenance of suppliers of product supplied to General Mills. The requirements shall be based on the results of a risk assessment which shall include consideration of:
  - the nature of the product and associated risks including allergens, microbiological hazards and foreign material
  - customer specific requirements
  - regulatory requirements in the country of manufacture and sale
  - source or country of origin
  - potential for adulteration or fraud
- The process for the initial and ongoing approval of the manufacturers of product shall be based on all or some of these:
  - certification of the manufacturing or packing site to a Global Food Safety Initiative (GFSI) benchmarked standard. The scope of the certification shall include the products traded by the broker.
  - supplier audit with a scope to include product safety, traceability testing, HACCP (Hazard Analysis and Critical Control Point)/hazard and risk management and good manufacturing practices conducted by a demonstrably competent food safety auditor.
  - For products assessed as low risk only, and where a valid risk-based justification is provided, initial and ongoing approval may be based on:
    - legally enforceable warranties (continuing guarantees) from the supplier (for non-food products)
    - a historical trading relationship supported by documented evidence of performance reviews demonstrating satisfactory performance (for non-food products)
    - a manufacturing-site questionnaire (Supplier Survey) which has been reviewed and verified by a competent person (for food or non-food products)
- Brokers shall ensure suppliers comply with General Mills requirements as written in General Mills material specifications and General Mills Ingredient Supplier Manual or Packaging Supplier Manual.
- Records shall be maintained of the manufacturer/packer approval process, including audit reports or verified current certificates of the manufacturing/packing sites supplying products traded. The Broker shall have a process to review these audit reports and documents of follow-up of any findings identified at the manufacturing/packing sites.
- There shall be a documented process for the ongoing evaluation of manufacturers and packers, based on risk and using defined performance criteria, which may include complaints, results of any product tests, regulatory warnings/alerts, customer





rejections or feedback. The process shall be fully implemented, and evaluation results shall be available to General Mills for each manufacturer or packer.

- The Broker shall maintain an Approved Supplier List for General Mills products which includes identification of approved manufacturing and packing locations.
- The Broker shall have procedures in place to ensure their suppliers are required to provide notification prior to making any changes to formulations, specifications or manufacturing locations that may affect products supplied to General Mills. The Broker shall notify General Mills of these changes and provide relevant documentation needed for approval and legal compliance. For PET specific requirements, see Appendix C.

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## MANAGEMENT OF SUPPLIERS OF SERVICES

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The Broker shall ensure that suppliers of outsourced services have been approved and are managed to ensure that any risks to product safety, quality and regulatory compliance have been evaluated and effective controls are in place.

- There shall be a documented procedure for the approval and monitoring of suppliers of services, e.g., transport, storage, laboratory testing, labelling, pest control. The approval process shall be risk-based and shall consider:
  - risk to product safety and quality
  - compliance with legal requirements, e.g., weight, label controls
  - customer-specific requirements
  - potential risks to the security of the product (food defense)
- The approval process shall be based on one or more of the following options:
  - certification of the supplier with applicable GFSI-benchmarked standard
  - supplier audit with a scope to include product safety, traceability testing, hazard analysis review, good operating practices, undertaken by an experienced and demonstrably competent product safety auditor
  - historical performance – supported by documented evidence of performance reviews demonstrating satisfactory performance
  - supplier questionnaire which has been reviewed and verified by a demonstrably competent person
  - legal licenses to operate.
- There shall be contracts or formal agreements with the suppliers of services which clearly specify service requirements and ensure that potential product safety risks associated with the service have been addressed.
- There shall be a formal process of review of service providers, based on risk and using defined performance criteria, which may include complaints, results of any product tests, customer rejections or feedback. The process shall be fully documented and implemented.

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## AGRICULTURAL PESTICIDE AND MYCOTOXIN MANAGENT

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The Broker shall be responsible for ensuring that the traded products are free from pesticides, environmental pollutants and mycotoxin, according to the law in the country of manufacture and sale.



The Broker shall also ensure their suppliers comply with General Mills' requirements on agricultural and mycotoxin management as written in the Ingredient Manual.

- The Broker shall ensure pesticides residues and mycotoxin in product are monitored according to General Mills required testing plan including frequencies and sample size.
- Test results shall be kept on available and provided to General Mills on request.

## **CONTROL OF PHYSICAL HAZARDS AND FOREIGN MATERIAL**

The Broker shall ensure that physical contaminants are controlled in their supplier's manufacturing facilities according to General Mills expectations as written in the Ingredient Manual and Packaging Manual.

Where the Broker or its contracted facility conducts a metal detector or x-ray screening of materials in their final unopened packaging, such devices shall be managed in a manner that is consistent with the CCP in the Broker's HACCP Plan.

- All physical contamination detection and control devices shall be documented in the facility's food safety/HACCP Plan. Each device shall have an effective management program including:
  - Immediate response to findings
  - Investigation into source and root cause
  - Risk assessment for product inspected
  - Complete documentation of checks and findings
  - Retention of foreign matter through shelf life of product
  - Procedures to follow when the device malfunctions
- Personnel whose job function involves activities related to monitoring, verification, validation, or maintenance of control devices shall have documented training to qualify them to interact with control devices.
- Material rejected from physical hazard detection and control devices shall not be released for shipment.
- Previously rejected material may be repassed for investigational purposes only and cannot be released.
- GMI recommends foreign material detection devices be as sensitive as possible knowing that more sensitive detection devices may be present in GMI receiving facilities.
- Physical hazard detection devices shall not be used to clean-up known contamination in ingredients or products.

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## **GLASS, BRITTLE PLASTIC AND CERAMICS CONTROL PROGRAM**

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Brokers shall minimize the use of glass, brittle plastic, and ceramic within storage areas or any other area where materials or products are exposed. Necessary glass/brittle plastic/ceramic components within storage and shipping/receiving areas shall be located and protected as appropriate to prevent breakage, damage, and/or product contamination.



The Broker shall have a documented glass, brittle plastic and ceramic control program including:

- A documented inventory of glass, brittle plastic, and ceramic components located and used in storage and shipping/receiving areas (including wireless/mobile devices that are used for operations).
- A documented inspection of these components performed on a frequency based on a risk assessment, minimum annually.
- A response procedure for glass, brittle plastic or ceramic breakage or damage. This procedure shall address segregation and breakage containment, product evaluation, clean up, documentation of the event, corrective action, etc.

Personnel who are involved with the handling of glass, brittle plastic or ceramic in storage or shipping/receiving areas shall receive documented training on the associated hazards and procedures.

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## **FOOD DEFENSE AND FOOD FRAUD MITIGATION**

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The Broker shall have measures in place to ensure that traded product is protected from theft, substitution or intentional contamination and economic adulteration throughout the supply chain segment that it controls. This is from the manufacture of the product, through storage, transportation and until it is delivered to General Mills.

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### **FOOD DEFENSE**

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- The Broker and its supplier shall conduct at least annually, an assessment of the potential risks to the security of the products while in their control. Corrective action taken for the gaps identified by the risk assessment shall be documented and shall form part of the contract or terms and conditions for subcontracted suppliers which have access to the product.
- The Food Defense program shall include:
  - Food Defense Team responsible for food defense plan and training development, implementation, and maintenance. This team will be responsible for investigation of threats or acts of intentional tampering and compliance with food defense regulations.
  - Analysis of the food defense risk, internal and external.
  - A formal, documented Food Defense Plan that includes annual self-assessment, mitigation action plan, emergency contacts, facility profile, food defense team members and FDA registration number (if making shipments to the US).
  - Customer Communication Plan.
  - Facility access points and materials effectively controlled.
  - Documented physical security policies and procedures to reduce and deter unauthorized access and to protect from exposure to or inadvertent or intentional release of proprietary information (all access and entry points for people/product/ chemicals controlled, employee and non-employee's identification, etc.).



- Documented policies and procedures that support food safety and regulatory including traceability, GMP, transportation and logistics.
- Documented Contingency or Crisis Management procedures shall include effective and immediate response to risk related to food defense.
- Routine audits of all access points
- Documented food defense training for employees, contactors and temporary employees upon hiring and once per year thereafter.

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## FOOD FRAUD RISK MITIGATION

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Systems shall be in place to minimize the risk of purchasing fraudulent or adulterated products and to ensure that all product descriptions are legal, accurate and verified.

- The company shall have processes in place to access information on historical and developing threats to the supply chain which may present a risk of adulteration or substitution of products. Such information may come from: trade associations, government sources or private resource centers.
- A documented vulnerability assessment shall be carried out on all products or groups of products to assess the potential risk of adulteration or substitution. This shall take into account:
  - historical evidence of substitution or adulteration
  - economic factors which may make adulteration or substitution more attractive
  - ease of access to products
  - sophistication of routine testing to identify adulterants
  - nature of the product
- A documented food fraud mitigation plan shall be developed, with reference to the vulnerability assessment, and implemented to control any identified risk. The methods of control and monitoring shall be defined and implemented.
- The vulnerability assessment shall be kept under review to reflect changing economic circumstances and market intelligence that may alter the potential risk. It shall be formally reviewed annually.
- The Broker's supplier shall have a Food Fraud Risk Mitigation program that complies with the expectations of General Mills as written in the Ingredient or Packaging Manuals. The Food Fraud Mitigation plan shall include identification of potential vulnerabilities, mitigation measures for significant vulnerabilities and training requirements.
- Where products are identified as being at particular risk of adulteration or substitution appropriate assurance and/or testing processes shall be in place to reduce the risk.

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## RESEARCH AND DEVELOPMENT

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The Broker shall ensure all new products developed for General Mills are safe, complies with quality requirements and laws and regulations.



- The Broker shall have a process for managing new product development activities with potential suppliers, which include sample reviews and a formal product approval procedure.
- The Broker shall have procedures to ensure all new products have been included in the manufacturing site's HACCP plan. This shall ensure that hazards have been assessed and that suitable controls have been implemented.
- The company shall have processes to ensure new products are labelled to meet legal requirements for the designated country of use. Depending on the legislation, this shall include information to allow the safe handling, display, storage, preparation and use of the product within the supply chain or by the customer. There shall be a process to verify that ingredient, allergen and allergen cross-contamination labelling is correct based on the product recipe and expected country of sale.

## **TRAINING AND QUALITY MANAGEMENT SYSTEMS**

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All Brokers shall have procedures in place to ensure all food safety and quality management systems are fully documented with clearly defined accountabilities. Change management procedures shall be in place to ensure review and communication of all changes. These shall also be accompanied by a record management program to ensure proper retention and storage of all related documentation. Records shall be easily accessible and stored in a manner to protect against loss or damage.

A documented training program shall be in place to ensure effective onboarding and ongoing awareness for quality and food safety programs. This should include an annual refresher for all employees and cover key topics such as food safety, HACCP, allergens, GMPs, food defense, regulatory compliance and other job specific topics where applicable.



## APPENDIX A: DEFINITIONS, CONTACTS AND REFERENCES

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### DEFINITIONS

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The following terms are used in this document to state GMI requirements and recommendations to brokers:

- Shall, Will (also Must) – Used to express an obligation or imperative, binding, with no exclusions (i.e., what is mandatory).
- Should – Used to express a strong recommendation among other possible options.
- May – Used to indicate an action which is permissible, but not mandatory.

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### CONTACTS FOR GMI BROKERS

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Human Food Ingredient and Packaging Suppliers

Use the following links for 3<sup>rd</sup> Party Audit Submissions:

- GGAP system
- For North America: [supplier.documentation@genmills.com](mailto:supplier.documentation@genmills.com)
- For outside North America: [XQM.Support@genmills.com](mailto:XQM.Support@genmills.com)

Use the following links for other inquiries on Specification:

For North America:

- GMI Specification Change Requests [spec.updates@genmills.com](mailto:spec.updates@genmills.com)

For LATAM:

- GMI contact [XQM.Support@genmills.com](mailto:XQM.Support@genmills.com)

For AMEA:

- GMI Specification Contact [SQA.India@genmills.com](mailto:SQA.India@genmills.com)

For AUNZ:

- GMI Specification Contact [specifications.au-eu@genmills.com](mailto:specifications.au-eu@genmills.com)

Pet Food Ingredient Suppliers

- Send 3<sup>rd</sup> party audit documents to [supplier.documentation@bluebuff.com](mailto:supplier.documentation@bluebuff.com)
- For specification enquiries contact Blue Buffalo Procurement team.



## APPENDIX B: VENDOR CLASSIFICATION DEFINITIONS

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Agent	A company that facilitates trade between a manufacturer or broker and their customer through the provision of services but does not at any point own or take title to the goods (i.e., purchase or become the legal owner of the product).
Broker	A company which purchases, 'takes title to' or has legal ownership of product for resale to General Mills. The company manages sales, specifications, customer requests, etc. for a vendor/corporate office but does not process, repackage or alter the product. It does not take physical possession of product but assumes responsibility for suppliers.
Distributor	A company that purchases and takes possession of product from a manufacturer, stores and sells the product to General Mills. The company does not process, repackage or alter the product. It may replace tertiary packaging, label (as in the case to comply with language laws) and pass the packaged product through a safety control device. It may have exclusivity of sale of the product.
Manufacturer	A location that processes, packages, or alters products for a customer. General Mills considers the last location that processes, repackages, or alters the product to be the final manufacturing location. The final manufacturing location is the location that will be represented on the specification for a location classified as Manufacturer.
Manufacturer-Distributor	A location that processes, repackages, or alters products and sells to customers through its own distribution centers.
Packer	A supplier location that packages a product, but does not alter or further process it. This may be considered to be the final touch point represented on the specification for a location classified as Manufacturer.
Supplier/ Corporate Office	The manufacturer's sales office from which the product is bought by General Mills, the Broker or the distributor.
Warehouse	Location that stores and ships products but does not process, (re-) package, or alter the product.



## **APPENDIX C: PET SPECIFIC REQUIREMENTS**

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Brokers for the PET segment are responsible for providing required documentation and analytical testing results (if available) to Blue for approval prior to using an ingredient from a new supplier or a new ingredient from an existing supplier.

Minimum documentation for AAFCO Natural may include:

- AAFCO natural statement on supplier letterhead
- Food safety plan
- Flow diagram
- Supplier material specification
- List of all component materials
- List of all processing aids/preservatives/additives
- Country of origin statement
- Safety data sheet

It shall also be confirmed that the ingredient is in compliance with True Blue Promise. Food safety testing will be determined by the XQM Category Manager. If the supplier or broker has already tested the material recently for any of those parameters, those results may be used. All claims shall be substantiated, and testing completed prior to shipping the ingredient to be used in PET. An audit of the manufacturing location may be required.

