



**SUPPLY BASE  
REQUIREMENTS  
— AND —  
EXPECTATIONS  
MANUAL**



## SUPPLY BASE REQUIREMENTS AND EXPECTATIONS MANUAL (SBREM)

### Table of Contents

#	SECTION TITLE	PAGE(s)
1.0	MANAGEMENT	5-6
2.0	FOOD SAFETY PROGRAM (FSP)	7-10
3.0	GMPS/GLPS	11-13
4.0	ALLERGEN CONTROL	14-15
5.0	FOREIGN and EXTRANEIOUS MATERIALS CONTROL	16-17
6.0	TRACEABILITY, MOCK RECALLS, and RECALLS	18-19
7.0	PEST CONTROL MANAGEMENT	19-20
8.0	FACILITY FOOD SAFETY and SANITARY DESIGN	21-22
9.0	SUPPLY BASE MANAGEMENT and MATERIAL/SERVICE CONTROL	23
10.0	NOTIFICATION OF OUTSOURCED PROCESSES and SERVICES	24
11.0	MANUFACTURING, PROCESSING, SERVICE, and REWORK CONTROLS	25-26
12.0	PACKAGING	26
13.0	CODING and LABELING CONTROLS	27-28
14.0	SANITATION and ENVIRONMENTAL MONITORING	29-30
15.0	STORAGE, WAREHOUSE, TRANSPORTATION, and DISTRIBUTION	31-34
16.0	EXTERNAL INCIDENTS, NON-CONFORMANCE, and COMPLAINTS	35
17.0	CALIBRATION PROGRAM	36-37
18.0	DOCUMENTS, DATA, RECORDS, and RETAIN SAMPLES	38-39
19.0	MATERIAL/SERVICE EVALUATION, HOLD, and RELEASE PROGRAM	40-41
20.0	AUDITS and INSPECTIONS	42-43
21.0	CONTINUOUS IMPROVEMENT	44-45
22.0	REGULATORY	46-47
23.0	FOOD SECURITY	48-50
24.0	RESEACH and DEVELOPMENT	51
25.0	EMPLOYEE TRAINING	52

\*CAMPBELL SUPPLIER PAGE: <https://www.campbellsoupcompany.com/suppliers/>



## Supply Base Partners (SBPs) – Category Types and Definitions

CATEGORY NAME	DEFINITION
Broker	An agent who negotiates and contracts the purchase of equipment, ingredients, materials, packaging or services that are used in the manufacture of Campbell branded finish products. Brokers shall be accountable to and always ensure the SBPs they represent comply with CSC SBREM requirements. They might also have direct responsibilities for Food Safety and Quality under certain regulations.
Contract Manufacturer	An outside manufacturer who uses ingredients or/and packaging materials and converts them into a branded finished product.
Depot	A location which stores only branded finished products for direct store delivery.
Distributor	A 3 <sup>rd</sup> party that is granted authorization to distribute CSC branded finish product to retailers.
External Product Development (PD) Site	A location which produces and/or tests sample products for or under the direction of Campbell. An external product development site may be a co-manufacturer, supplier, contract product development company, or other location with or without a federally registered/inspected pilot production facility.
Grower	An agent who grows and/or harvests, brushes, washes or trims and delivers raw agricultural commodity items. No further processing or form change.
Ingredient Supplier	A company that manufactures, processes, and supplies food ingredients for use in CSC branded finished product.
Licensee	A third party who is granted authorization to co-brand, manufacture, distribute, and/or market a product using any Campbell Soup Company (CSC) brand names.
Packaging Supplier - Primary	A company that manufactures and/or supplies packaging material that comes into direct contact with the food component of CSC branded product.
Packaging Supplier - Secondary	A company that manufactures and/or supplies packaging material that does NOT come into direct contact with the food component of CSC branded product.
Re-Packer (RP)	An outside manufacturer who takes “parent” or “work in process” (WIP) product produced either internally or externally then packs the products into a primary packaging or finished product format. There is direct product exposure to the environment during the activity.
Special Packer (SP)	An outside manufacturer who takes primary packages and converts them into different finished configurations (e.g. club items, pallet displays, promotional packs, etc.) or relabels finished product. There is no direct product exposure to the environment.
Warehouse – Finished Product	A company that stores CSC branded finished product for supply chain distribution.
Warehouse – Raw Material	A company that stores and inventories materials (ingredients &/or packaging) for use in CSC branded finished product.



## Supply Base Requirements and Expectation Manual (SBREM) – Exemptions, Modifications, and Additional Requirements

The SBREM is intended to cover general Food Safety and Quality System Requirements as defined by Campbells for all Supply Base Partners(SBP). The reference chart below is reserved to identify where there may be an Additional (A), Exemption (E), or Modified (M) requirement in place for a particular combination of Requirement section and Supply Base Category. If you do not see an A, E, or M for the category than you are expected to fully comply with the Requirement as written.

### Definitions:

Additional (A)	SBP will have to comply with both the general requirements and additional requirements as found in the addendum section.
Exemption (E)	SBP does not have to comply with the general requirements of the section.
Modified (M)	SBP does not have to comply with all general requirements as written. May need to comply with a portion and/or have alternative requirements found in the addendum section.

### SBREM Requirements Matrix:

Requirement Section #	Broker / Distributor	Contract Manufacturer / Licensee	Ingredient / Re-Packer	Package - Primary	Package - Secondary	Grower	WHSE- Raw Material	WHSE- Finished Product / SP / Depot
1.0						E  Must comply with USDA GAP		
2.0					E		M	M
3.0							M	M
4.0					E		M	M
5.0							E	E
6.0								
7.0								
8.0							M	M
9.0								
10.0							M	M
11.0							E	E
12.0							E	E
13.0							M	M
14.0					M			
15.0					M			
16.0								
17.0							M	M
18.0								
19.0								
20.0								
21.0							M	M
22.0								
23.0								
24.0					M		E	E
25.0								



## 1.0 - MANAGEMENT

### 1.1 – Assessments and Expectations:

Supply Base Partners (SBPs) shall have a Food Safety and Quality management system in place that is able to demonstrate effective analysis, controls, and continuously improves the business. The scope should include its own business needs, Supply Chain, Regulatory compliance, Product Food Safety and Quality, and conformance to the expectations set forth in the overall Campbell's Supply Base Requirements and Expectation Manual (SBREM).

### 1.2 – Personnel:

The SBP's management team shall have the responsibility to ensure the following:

1. Resources: Provide human, financial, technological, and other resources required to effectively establish, implement, maintain, and continuously improve the Food Safety and Quality Management System.
2. Organization: Ensure clear accountability for Food Safety and Quality exist at all levels, up to and including, senior management levels. One person shall have overall accountability for the implementation and management of the Food Safety and Quality system program. A documented organizational structure that describes the jobs, responsibilities, authorities, and interactions of the people who manage, perform, and verify work related in any way to Food Safety, Quality, and Regulations. This includes, but is not limited to; CEO, VPs, Directors, Managers, Supervisors, Coordinators, Auditors, Lab analysts, and Operators.

### 1.3 – Program Documentation:

The SBP's management team shall have the responsibility to ensure the following aspects of a Food Safety and Quality program are in place to support the overall strategy, purpose, and direction of the business.

1. Food Safety and Quality policy: A documented policy stating the commitment to Food Safety and Quality and satisfying all applicable requirements. The policy shall be communicated and understood by all levels of management and employees and made available to Campbell upon request. The FSQ policy should set the foundation for the overall Food Safety and Quality System.
2. Regulatory compliance: Ensures all operations, activities, products produced, and services are compliant with all applicable laws and regulations of where they exist, are manufactured, stored, distributed, and sold under SBP's ownership and chain of custody.
3. SBREM compliance: Review the requirements of this manual and ensure integration of it occurs in the SBP's Food Safety and Quality management Systems. All relevant personnel shall be made aware of their responsibilities for compliance to the Campbell SBREM. Compliance to this manual is an obligation of doing business with Campbell and all of its entities. Periodic assessments of SBP's compliance will be made through Food Safety and Quality document request, surveys, visits, and audits by Campbell Quality or representatives.
4. Continuous Improvement: SBP shall have clearly defined a continuous improvement program that, includes but is not limited to; Food Safety and Quality objectives, responsibilities, tasks, metrics, frequencies, corrective actions, and records. Reports on the performance of the food safety and quality system as well as formal reviews by plant and senior management are included.
5. Change management: SBP shall have written policies in place to address change management for all critical aspects of the business. It shall include documenting details of what has changed, an assessment on any impact to Food Safety, Regulatory, and Quality compliance. Define responsibilities for review and approval of the changes, dates of changes, and a process for the communication of changes to customers that are impacted. The scope of change management must include, but is not limited to; changes in specifications, formulas, raw materials, packaging,



approved suppliers, processes, systems, equipment, nutrition, co-manufactured finished product, labels, key management, and production facilities/locations.

- a. Changes that have a direct Food Safety, Regulatory, and/or Quality impact to Campbell require notification and approval by Campbell.
  - b. Certain changes will always require notification and approval by the appropriate Campbell function. They include changes in:
    - i. Manufacturing facilities, processes, or origin
    - ii. Specifications
    - iii. Labels – bulk label, nutritional statements, claim declarations, order of predominance
    - iv. Contract manufacturing - processes, formulas, labels, suppliers, packaging, and finished product.
6. Crisis Management: A documented process exist with a multidisciplinary team to manage crisis situations involving Food Safety, Quality, and Regulatory issues. This includes plans to manage recall and retrieval activities. Roles and responsibilities, including decision making authority, shall be well defined and documented. Campbell shall receive notice with urgency, no later than 24 hours, if Regulatory contact should occur for sampling, investigation, inspection, or inquiry about an ingredient sold to Campbell or on Campbell branded product. The SBP shall never initiate a recall of any product sold to Campbell without prior notification to Campbell. Campbell branded product requires Campbell approval for recall.
7. Business Continuity: A documented plan shall be in place for the recovery from either a partial or complete interruption of critical functions due to an unforeseen event. Plan shall have identified in it key contacts, alternative location(s) where manufacturing or critical activities may take place, assessment of capability to conduct manufacturing or activities, and confirmation of compliance with Campbell's SBREM. Campbell branded products, such as those produced by Co-manufacturers, require joint business continuity planning and approval by Campbell. In all cases the plan must ultimately be shared with Campbell as the alternative location(s) will prior to its use require an audit by Campbell Quality or its representative as part of the approval process.



## 2.0 – FOOD SAFETY PROGRAM (FSP)

### 2.1 - Program Assessment and Expectations:

Each SBP shall have a holistic Food Safety Program (FSP) in place which includes a comprehensive risk assessment for hazard(s) identification, control, and/or elimination. This risk assessment shall be inclusive of the entire SBP's supply chain, from suppliers, to SBP's internal operations and services, to the SBP's customer. The program shall be anchored in the most current, scientifically based, food safety principles. The design of the FSP may vary slightly based on industry standards, country regulation, and SBP needs but overall must meet the intent of this requirement.

### 2.2 - Personnel:

1. Shall be trained in and demonstrate knowledge of Food Safety.
2. Food Safety training shall be conducted by qualified and/or certified individual(s).
3. Job descriptions shall define food safety requirements for individuals.
4. Individuals shall be able to demonstrate food safety competency relative to their job description.
5. Documented training for employees shall exist.
6. Shall be able to perform duties as required by their role, responsibilities and level to ensure Food Safety, Quality, and Regulatory compliance.
7. Shall follow the Food Safety program (FSP) to ensure Food Safety, Regulatory, and Quality requirements are met.

### 2.3 – Program Documentation:

Campbell expects that Food Safety programs have defined procedures with clear roles and responsibilities that address the following minimum requirements in the identification, mitigation, and/or elimination of Food Safety hazards from the Supply Chain:

1. Perform an analysis of Biological, Chemical, Physical, Radiological, and Economical Adulteration risk in the overall Supply Chain to identify hazards. That includes but is not limited to:
  - a. Incoming Ingredient and Packaging
    - i. Inherent material risk
    - ii. Industry Food Fraud
  - b. Supplier risk
  - c. Internal Manufacturing and Operational risk
    - i. Process controls
    - ii. Food Security
  - d. Storage and distribution risk
  - e. Customer risk
    - i. Identification and communication of any risk passed from the SBP to Campbell.
      1. Complete Campbell's Food Safety and Quality supplier surveys, provide requested documents, and allow access for Campbell Audit.
2. Manage Controls of Hazards
  - a. Establish where the controls in the Supply Chain are needed in order to mitigate and/or eliminate hazards
    - i. Provide proper scientific justification for the selection of the identified controls
    - ii. Validate the controls.
  - b. Establish criteria for monitoring the controls
    - i. Control limits and defect/deviation criteria.
    - ii. Verification activities including frequency of monitoring.
  - c. Establish corrective action for deviations and regaining control.
  - d. Establish record keeping.
  - e. Establish management reporting
3. Establish regular reviews of the Food Safety program
  - a. Define performance metrics.



- b. Validate the effectiveness of the plan anytime changes that impact the FSP occur or least annually if no changes have taken place since the last annual review.
- c. Document management reviews of FSP performance.
- d. Demonstrate continuous improvement of the program is taking place.

#### **2.4 - SBP Material Level Hazard Assessment for Campbell's Food Safety Program:**

Food Safety risk of materials will be reviewed and established as part of the Campbell's Specification approval process. This shall include but not be limited to:

1. The SBP shall fill out a Campbell Supply Base Hazard Survey and provide other pertinent documentation around hazards that may be associated with or exist in the material.
2. SBP shall assess every unique material and manufacturing location combination for hazards associated with Biological, Chemical, Physical, Radiological, and Economical Adulteration sources.
3. SBP shall understand the risk around pesticides, chemicals, heavy metals, or additives related to the growing, manufacturing, holding, and shipping of the materials SBP make available or sell to Campbell. SBPs shall ensure proper application and handling occurs so that all country regulations through the supply chain, from origin to point of sale to Campbell, are met.
4. If the SBP determines that they are passing along a hazard to Campbell that has the potential to cause illness, injury, or death, Campbell needs to be notified in writing that a control is not in place at the SBP. This notice must be received in advance of signing specifications and before the first shipment of material is accepted in order to develop a control plan to address the risk.
  - a. Such materials will be considered high risk and require an annual Campbell and/or GFSI audit minimally.
  - b. Although a SBP may have controls in place to address a hazard Campbell may still considered a material high risk due to the application it is used in by Campbell. This risk to Campbell's finished product will also minimally require an annual Campbell and/or GFSI audit.
5. SBP shall comply with Campbell material specifications. The SBP shall have a monitoring, testing, and control program in place that ensures Regulatory tolerances, Campbell specification, and overall Food Safety compliance of the materials they make available or sell to Campbell.
6. Campbell may request access to supplier residue/heavy metal data, require pre-shipment samples, or ongoing incoming testing by Campbell or a third party laboratory.
7. The SBP shall ensure that no illegal substances of any kind are present in the materials they make available or sell to Campbell. They shall have a process in place to identify, control, and destroy any material found to be adulterated. If Campbell is impacted it must be reported directly to the Campbell contract or Quality representative.

#### **2.5 - Campbell's Verification Activities:**

Campbell may conduct any or all of the following verification activities on the SBP Food Safety and Quality System as part of an SBREM compliance assessment:

1. Audits and Inspections – document, product, systems, desk, on site facility, etc.
2. Sampling & Testing – pre-shipment, upon receipt, or ongoing
3. Review of Food Safety and Quality records
4. Other, if applicable

#### **2.6 - External Food Safety Program Standards:**

All Supply Base Partners are required to follow the FSP expectations of Campbell and have at least one of the two external standards implemented for Food Safety hazard management. Where regulations exist that dictate the format of Food Safety Program management for an SBP, SBP must





meet both regulatory and the forementioned Campbell specific Food Safety Program requirements in a way that demonstrates compliance to both.

Campbell's recognizes two external approaches that support holistic Food Safety Program management – HACCP and Food Safety Plans:

1. Hazard Analysis Critical Control Points or HACCP as defined by Codex Alimentarius, FAO/WHO, FDA, and USDA.
  - a. HACCP References:
    - i. [Codex.GPFH.HACCP.2003.pdf](#)
    - ii. <https://www.fda.gov/Food/GuidanceRegulation/HACCP/ucm2006801.htm>
    - iii. <https://www.fsis.usda.gov/wps/portal/fsis/topics/regulatory-compliance/compliance-guides-index/haccp-guidance>
2. Food Safety Modernization Act (FSMA) Food Safety Plan as defined by the FDA and required for the US domestic SBP and Exporters to the US for applicable materials.
  - a. Food Safety Plan References
    - i. <https://www.fda.gov/Food/GuidanceRegulation/FSMA/default.htm>
    - ii. <https://www.fda.gov/food/guidanceregulation/fsma/ucm539791.htm>

## **2.7 - HACCP:**

In implementing a HACCP plan the SBP shall ensure they use a standard provided in section 2.6 for full implementation of an effective FSP.

HACCP based programs shall include:

1. A trained, multidisciplinary HACCP team shall be in place and responsible for but not limited to program/plan development, implementation, reviews/revision/reassessments, and employee training. All activities conducted by the team shall be documented.
2. The HACCP team shall develop, and verify for accuracy, a flow diagram of the unit operation or system. The flow diagram shall be comprehensive enough to assure that all hazards are identified.
3. Each facility shall develop, implement, and maintain a documented HACCP Plan. The plan shall be in accordance with the following seven internationally-recognized HACCP principles:
  - a. Principle 1 - Conduct a Hazard Analysis
  - b. Principle 2 - Identification of Critical Control Points
  - c. Principle 3 - Establishment of Critical Limits
  - d. Principle 4 - Establishment of CCP Monitoring Procedures
  - e. Principle 5 - Establishment of Corrective Actions
  - f. Principle 6 - Establishment of Verification Procedures
  - g. Principle 7 - Establishment of Documentation and Record-Keeping Activities
4. HACCP plans shall include the following documentation:
  - a. HACCP Approval Page
  - b. HACCP Team Members
  - c. History of Changes
  - d. Facility Overview
  - e. Process Flow Diagrams
  - f. Hazard Analysis, including scientific justification
  - g. HACCP Master Plan
  - h. Sample CCP Monitoring Records (blank copy)
5. Scientific justification and support documentation used in developing the plan (i.e., risk analyses, scientific articles cited, challenge studies) shall also be maintained with the HACCP Plan.
6. Each facility shall maintain records related to the HACCP Plan, including all manufacturing records related to the HACCP activities, such as those resulting from CCP monitoring, verification, and when necessary, corrective action activities.
7. Prior to the release of product for distribution (or before product is out of the facility's control), all HACCP records (including electronic records, where applicable) shall be reviewed for compliance, signed, and dated by an individual who did not produce the



records, and has been trained on HACCP principles and actions to be taken if critical/operating limits are not met.

8. All HACCP records shall be maintained in compliance with Section 18 of this manual for a minimum of 3 years plus current year, or for the product shelf life plus one year, or as per local regulatory requirements, whichever is longer.
9. The HACCP Team shall verify the effectiveness of the HACCP plan each time materials, processes, or equipment change, new products are added to the plan, or at a minimum annually. HACCP team members shall sign off for all changes and annual review.

## **2.8 - Food Safety Plan (FSP)FDA FSMA compliant:**

In implementing an FDA FSP the SBP shall ensure that the plan includes the assessment of risk and hazards defined in terms of the 4 key Preventative Controls categories below. The SBP shall use the Regulatory standard provided in section 2.6 for full implementation of an effective FSP.

The overall FSP shall include:

1. Facility Information
2. Preliminary Steps
3. Good Manufacturing Practices (GMP) & Prerequisite Programs
4. **Hazard Analysis & Preventive Controls Determination**
  - a. **Process Preventive Controls**
  - b. **Food Allergen Preventive Controls**
  - c. **Sanitation Preventive Controls**
  - d. **Supply-Chain Preventive Controls**
5. Recall Plan
6. Reanalysis of Food Safety Plan
7. Food Safety Plan Report
8. Signature
9. Recordkeeping Procedures
10. Important Contacts
11. Supporting Documents

## **2.9 - Specialized Process/Product Food Safety Requirements:**

Certain processes and products may require additional Food Safety requirements, reviews, and approvals as mandated by Regulation and/or Campbell Process Authority.

1. The SBP shall be aware of cases where specific regulatory approvals or filing may need to occur and they shall ensure compliance.
2. As relevant to the specialized process or product the SBP will be provided with Campbell's additional requirements. Campbell Process Authorities will engage the SBP on these requirements during contract reviews.
3. As appropriate, specialized requirements may additionally be on Campbell's supplier page so the SBP should review if there are any applicable requirements they may need to comply with posted there.



## **3.0 – Good Manufacturing Practices (GMPs) / Good Laboratory Practices (GLPs)**

### **3.1 – Program Risk Assessment and Expectations:**

Supply base Partners (SBPs) must perform a complete and thorough GMP risk assessment as part of their Food Safety Program. All facility personnel, management staff, inter-company personnel, visitors, maintenance, and outside contractors shall comply with a high degree of Good Manufacturing Practice (GMP) requirements and all regulations in the locations where product is manufactured, stored, and distributed.

### **3.2 - Personnel:**

1. Personnel shall be trained in and demonstrate knowledge of GMPs.
2. Documented training for employees shall exist. Regular refresh training shall also occur.
3. Personnel shall follow GMPs to ensure Food Safety, Regulatory, and Quality requirements are met.

### **3.3 – Program documentation:**

SBPs shall establish and maintain a documented GMP program to ensure products and materials are handled, stored, packed, and delivered under controlled conditions to maintain Regulatory, Food safety, and Quality compliance. Such requirements shall be effectively communicated, prominently posted within the facility, and continually monitored. The SBP GMP's shall effectively address, at minimum, the following requirements:

### **3.4 - Personnel GMPs:**

1. Hand Washing each time on entry to the manufacturing Area, prior to handling food, or food contact items: use running water at a suitable temperature, apply soap, rub for 20 seconds, rinse with running water, and dry without re-contaminating hands.
2. Fingernails: clean, short, and no polish, false, acrylic, decorated nails.
3. Jewelry: No jewelry, visible body piercings, or watches (exceptions: one plain ring of significance worn on a finger and medical alert bracelet/wristband or necklace).
4. Sores and cuts: cover with waterproof, colored (highly visible), and metal detectable bandages.
5. Uniforms: clean, no button closures, no pockets above waist, not sleeveless, fraying, or torn.
6. Gloves (if used): adequate product contamination controls; colored (e.g. blue).
7. Hairnets (in processing areas): single use; cover all hair and worn over the ears.
8. Beard Guards/Snoods/Masks (in processing areas): completely cover facial hair (if not clean shaven)
9. Eating/Drinking: only in designated areas.
10. Smoking/Smokeless Tobacco Products/E-cigarettes: used only in designated areas and properly disposed of when done.
11. Eyelashes: No false eyelashes in the processing areas.
12. Perfume: No heavy perfumes or lotions in processing areas.
13. Pins: No straight pins or safety pins in the processing areas.
14. Personal Items: No personal items in the processing areas with the exception of prescribed, site approved medication. Medication stored in a manner which prevents inclusion into product.
15. Cleaning: Employees shall perform general housekeeping duties to keep their workspace clean and organized to prevent product contamination.



### **3.5 - Object Labeling and Usage GMPs:**

1. A system of organization (e.g 5S) shall be established for tools and equipment to prevent them from becoming a source of contamination.
2. A color code system should be established for tools and equipment. Signs prominently posted for employee reference.
3. Chemicals (if used): shall be clearly labeled, identified, properly stored, and access effectively controlled.
4. Equipment/tools/containers/etc.: used, identified, and stored in a way to prevent cross-contamination.
5. Food containers/packaging materials (trays/bins/cans/jars/etc.): used for food items only.

### **3.6 - Manufacturing Environment: Overhead Structures, Equipment, and Surroundings**

1. Overhead structures, equipment, and surroundings in the manufacturing environment shall be checked prior to the start of production for any potential food safety risk such as water drippage, loose paint and plaster, rust, deteriorated pipe insulation, dust, metal shavings, part wear, etc. where food, food containers, packaging materials, or food manufacturing equipment are present.
2. Overhead structures which cannot be easily accessed must be inspected and cleaned at a sufficient frequency.

### **3.7 - Metal Tools/Utensils used in Production and Cleaning**

1. A list of high risk metal tools/utensils used in production and for cleaning which are susceptible to foreign material incidents shall be compiled and documented.
2. These items shall be regularly inspected for evidence of deterioration or damage (e.g. sifter wire, cutting devices, wire brushes, sewing needles etc.); all inspections should be documented.
3. A process shall be implemented for the replacement of items when deterioration or damage has occurred.
4. Segmented/snap-off knife blades, wire brushes, and steel wool shall be prohibited.

### **3.8 - Non-Brittle Plastics**

1. A list of high risk non-brittle plastics susceptible to foreign material incidents shall be compiled and documented.
2. These items shall be regularly inspected for evidence of deterioration or damage (e.g. product belts, conveyors, scoops, scrapers, bags, liners ingredient receptacles, etc.); all inspections should be documented.
3. Whenever possible, high risk non-brittle plastics should be detectable [such as embedded with metal or laced with barium sulfate at 15%-25%] to make them X-ray detectable.
4. Plastic liners shall be a bright contrasting color to that of its contents (preferably blue) and of a gauge thick enough not to tear.
5. Only food grade bags and containers shall be used for covering, staging, or storing ingredients / food-contact packaging materials.

### **3.9 - Glass, Porcelain, Ceramics, and Brittle Plastics**

1. Glass, porcelain, ceramics, and brittle (easily broken or cracked, shatterable) plastics shall be prohibited in manufacturing, handling, and storage areas unless there are absolutely no alternatives.
2. A list of all glass, porcelain, ceramics, and brittle plastics shall be compiled, including object name and location.
3. Inspections for evidence of breakage, deterioration, or damage shall be conducted at specified frequencies based on potential product risks.
4. The facility shall have documented steps to be taken if glass, porcelain, ceramic, or brittle plastic breakage occurs.



5. All breakage incidences shall be investigated and documented including: object, location, possible source, root cause, corrective and preventative actions, and disposition of any affected product or materials.

### **3.10 - Wood Restrictions and Pallets**

1. General pallet management
  - a. Wood shall be excluded from all areas where there is a potential for product or equipment contamination.
  - b. Wooden pallets and wooden totes may be utilized as long as there is a documented program detailing precautions taken to avoid any potential product or equipment contamination.
  - c. Pallets shall be dry, well-constructed, and not cracked, broken or damaged.
  - d. Pallets shall be free of animal droppings, insects, insect webbing, mold, debris, odor, and flaking paint.
  - e. The use of detectable plastic pallets that follow the non brittle plastic policy on barium sulfate lacing is strongly recommended.
  - f. A documented inspection program shall be implemented to remove damaged pallets from use.
2. Product pallet management:
  - a. Pallets used for storing/transporting food materials shall only be used for food.
  - b. Pallet slips/slip sheets/layer pads shall be used between a pallet and material when a risk of wood contamination exist. Slip sheets shall always be used when double stacking pallets.
  - c. Products shall be palletized in such a way that there is no excessive overhang on any side of the pallet. Products shall be evenly distributed across the pallet.
  - d. Product pallets must have a unique pallet identification (ID) placard or tag. Pallet identification shall be legible and of a suitable font size to be visible at all times, especially in storage.

### **3.11 - Tape**

1. The use of tape shall be avoided.
2. However, if it is necessary to the operation (e.g. sealing ingredient bags), only bright colored tape of a contrasting color to the product and packaging shall be used.
3. Tape, such as duct tape, electrical tape, etc. should not be used for any repairs.

### **3.12 - Good Laboratory Practices**

SBP internal laboratories and third party laboratories contracted by the SBP who perform testing on ingredients, packaging, and/or finished products used and/or produced for Campbell shall comply with Good Laboratory Practice (GLP) requirements and all regulations in the locations where product is manufactured, stored, and distributed.

1. The laboratories shall have documented testing procedures based upon official test methods, or test methods which have been validated for the intended use consistent with GLP requirements as applicable (e.g. EPA, FDA, AOAC).
2. All analysts shall receive proper training in each test method they perform and shall demonstrate proficiency in performing these tests. Campbell reserves the right to test lab competencies.
3. Accreditation of all laboratory facilities is highly recommended. Microbiological testing laboratories providing COAs/COCs must be accredited.



## **4.0 – ALLERGEN CONTROL**

### **4.1 – Program Risk Assessment and Expectations:**

Supply Base Partners (SBPs) must perform thorough allergen risk assessment as part of their Food Safety Program. Scientific data and justification for the decisions by the SBP on whether a material is allergenic or contains an allergen must exist as part of the allergen risk assessment.

The risk assessment shall be based on, but not be limited to; ingredients, line, equipment, scheduling, changeovers, labeling, rework, processing room air flows, dust management, movement of materials/people, and storage. SBP shall conduct an allergen self-assessment, at minimum, annually and when the following occurs: new ingredients, new or re-formulated products are introduced, processes are new or modified, equipment changes, changes in chemicals or sanitation procedures, and allergens introduced unintentionally (e.g. through the lunch room).

### **4.2 - Personnel:**

1. Shall understand and be trained in allergens, allergen issues, allergen risk, and consequences of allergen cross contamination.
2. Shall manage allergens properly to prevent allergen cross contact or contamination.
3. Shall ensure proper handling, storage, and labelling of allergens on all materials.

### **4.3 – Program documentation:**

SBPs shall establish and maintain a documented Allergen program to ensure products and materials are handled, stored, packed, and delivered under controlled conditions to maintain Regulatory, Food Safety and Quality compliance. Such requirements shall be effectively communicated, prominently posted within the facility, and continually monitored. The SBP Allergen program shall effectively address, at minimum, the following requirements:

### **4.4 - Allergen Identification, Regulatory compliance, and Labeling:**

Supply Base Partner (SBPs) shall label, monitor, and control allergens as identified and required in the laws and regulations of both the producing country and the intended country of use.

1. SBPs must maintain a master list of all allergens existing in their facility and products. That list shall be available to Campbell upon request.
2. SBPs shall notify Campbell of the presence of all allergens in all products made available, manufactured for or sold to Campbell and any time a change occurs in the allergen composition of a product. This shall be clearly communicated to Campbell by the SBP in writing through specification approvals, ingredient formula label declarations, ingredient packaging labels, finished product labels, and purchase agreements.
3. Allergen color-coding should be used and a document in place to describe it. Documents and signs should be posted describing the allergen color-coding.
4. SBP shall be able to demonstrate their ability to make allergen “free” claims on all products they sell to or manufacture for Campbell's.
5. Major allergens of concern are identified as but not limited to the following categories, products containing, or derived from these categories:
  - a. Cereals containing gluten (i.e. wheat, rye, barley, oats, spelt, or hybridized strains) and cereal products
  - b. Wheat and wheat products
  - c. Crustaceans and crustacean products (shrimp, etc.)
  - d. Mollusks and mollusk products (clams, etc.)
  - e. Fish and fish products (cod, salmon, etc.)
  - f. Eggs and egg products
  - g. Milk and milk products (including lactose)
  - h. Peanuts and peanut products



- i. Tree Nuts and tree nut products
  - j. Soybeans and soy based products (includes soy lecithin and soy flour)
  - k. Sesame Seeds
  - l. Sulphites (Sulfites) in concentrations of 10 mg/kg or more
6. Some regions/countries have additional regulatory requirements regarding the management and control of allergens beyond those listed above. These regulations must be taken into consideration when manufacturing products in those regions/countries and when manufacturing products to be exported into those regions/countries.
  7. For more information, please see the Food Allergy Research and Resource Program (FARRP)–International Allergen Regulatory Chart: <http://farrp.unl.edu/IRChart>

#### **4.5 - Allergen Operational Controls:**

SPBs allergen operational controls shall include but not be limited to:

1. Development and utilization of an allergen product changeover matrix, or similar alternative to help facilitate an effective production schedule, minimize the allergen impact on their finished products, and ensure sufficient time to allow for changeovers and allergen cleaning. Allergen containing products should follow non-allergen containing products.
2. Whenever possible, isolate allergens to separate or designated lines; or use effective physical barriers.
3. SBPs shall develop and maintain allergen cleaning procedures specific to their manufacturing requirements, equipment, and environment. The facility shall be responsible for validating the effectiveness of cleaning procedures, instructions, and materials that will result in the adequate removal of the allergen(s).
4. The amount of equipment exposed to an allergen(s) shall be minimized. Avoid line crossovers, where possible, and allow adequate space for effective cleaning.
5. Tools/utensils/containers (i.e. brushes, scoops, measuring devices, shovels, buckets, etc.) shall be allergen color-coded, identified per allergen; or separate tools/utensils/containers shall be used for each ingredient with cleaning after each use.
6. Tools/utensils/containers shall be stored in a manner that prevents any possible allergen cross-contact. All tools/utensils/containers shall be adequately cleaned per validated cleaning method.
7. Traffic patterns for ingredients, packaging materials, equipment, tools/utensils/containers, waste, and personnel, based on risk, shall be controlled during handling and processing of allergen containing products in order to prevent cross-contact.
8. For stored ingredients and work in progress (WIP), allergen containing ingredients shall not be stored above non-allergen containing ingredients or non-compatible allergens. Whenever possible, allergen containing ingredients should be stored in segregated areas. For floor bays, separation should be maintained between ingredients that do not contain identical allergens; barriers or sheeting may be used as needed. All raw ingredient containers shall have lids or be sealed.
9. Suppliers shall have a documented procedure in place in the event of an allergen spillage to prevent cross-contact.



## **5.0 – FOREIGN AND EXTRANEIOUS MATERIALS CONTROL**

### **5.1 - Program Risk Assessments and Expectations:**

SBP shall perform a risk assessment and have documented programs in place as part of their overall Food Safety Plan (FSP) to prevent contamination of their product from foreign and extraneous materials. The program shall address, at a minimum, the following elements:

### **5.2 - Personnel:**

1. Shall understand and be trained in foreign materials and extraneous materials, associated with the material, process, system, equipment, and industry. Training shall include understanding the risk and effects of contamination.
2. Shall manage materials, processes, systems, and equipment properly to prevent foreign and/or extraneous material contact or contamination.
3. Training shall be documented and appropriate for each job function.

### **5.3 – Program documentation:**

SBP shall establish and maintain a documented Foreign and Extraneous Material Control Program to ensure products and materials are handled, stored, packed, and delivered under controlled conditions to maintain food safety and quality. Such requirements shall be effectively communicated, prominently posted within the facility, and continually monitored. The SBP Foreign Material and Extraneous Material Program shall effectively address, at minimum, the following requirements:

1. Each facility shall have documented procedures or work instructions for monitoring all detection and removal devices.
  - a. They shall include set up, detection limits, operation, frequency of monitoring, responsible individuals, the effectiveness of the reject mechanism when present, and corrective action.
2. Examination of the rejected product shall be conducted and documented by trained authorized personnel.
3. Foreign material found during device monitoring activities shall be documented.
4. Findings of unusual or excessive extraneous material shall be reported to facility management and Campbell when applicable. Corrective actions shall be implemented to minimize reoccurrence.
5. Records shall be maintained for all foreign and extraneous material detection devices which detail, at a minimum, a list of the devices in the facility, the type of device, location, and validation of each device's capability/sensitivity.

### **5.4 - Device Assessment and Selection:**

Facilities shall conduct a documented risk assessment to determine the most appropriate device for the operation.

1. They must be designed to detect and/or remove foreign and extraneous material that may have entered the product stream. This shall include extraneous material that is naturally occurring in ingredients.
2. Clear justification must be documented as part of the risk assessment to explain why a device was selected or why it may not have been when it is typical for a certain industry process.
3. The sensitivity, test piece sizes, and removal capabilities shall be established to detect the smallest possible contaminant with consideration of product attributes and the manufacturing environment that affect detection potential. Justification explaining how these limits were arrived at shall be established and documented.





4. The Supply Base Partner (SBP) shall document the limits on the specification of the material sold to Campbell. This is subject to Campbell's specification approval process.

#### **5.5 - Device Location and Performance:**

Foreign and/or extraneous material detection and/or removal devices shall be installed at relevant points along processing lines from raw material through to finished product packing.

1. Flow charts shall be developed that clearly identify the location and type of all devices throughout each line or process
2. Devices shall be fully operational at the start of production and throughout the manufacturing process.
3. Devices like Metal detectors and X-Rays shall have an audible and/or visual indication of the detection to alert employees of a violation.
4. Metal detectors should have a rejection or isolation mechanism that allows for a secure (can't re-enter the product stream) area for the rejected product.
5. Devices must have a failsafe design such that the loss of energy (e.g. air or control power) results in the rejection of all materials or a line stop.

##### **5.5.1 - X-Ray Units**

Where X-ray units are used they shall be capable of detecting ferrous, non-ferrous, stainless steel, and other extraneous materials such as bone, stones, wood, and glass. If plastic laced with barium sulfate is utilized in the facility the X-ray units shall also be capable of detecting it.

##### **5.5.2 - Metal Detectors**

Where Metal detectors are used they shall be capable of detecting ferrous, non-ferrous, and stainless steel.

##### **5.5.3 - Other detection devices**

Magnets, screens, sieves and other devices may also be used for removal of foreign material.

#### **5.6 - Contaminated Product/Material**

Each facility shall have a detailed process in place for effectively managing and documenting product/material contaminated by or suspected of contamination by foreign and extraneous material. This may be a part of a normal hold and release procedure. All exhibits shall be retained and a documented root cause analysis shall be conducted with corrective actions taken.

#### **5.7 - Maintenance / Preventative Maintenance Program:**

Proper facility and equipment maintenance is an essential component of a Food Safety and Foreign Material Control plan. The SBP shall have:

1. A documented facility maintenance program and resources to support it.
2. A documented preventative maintenance (PM) program for all equipment used in manufacturing and logistics related processes. Including a work order procedure.
3. Identification of critical food safety equipment, PM schedule for maintenance of this equipment, and calibration requirements/records.
4. Documented procedures in place to ensure maintenance work and temporary repairs do not become a source of contamination. The procedure shall include but not be limited to tools/parts reconciliation, control of contractors, use and storage of food grade lubricants/greases/coolants, and equipment commissioning/re-commissioning.
5. GMP/Food Safety training for maintenance personnel.



## **6.0 – TRACEABILITY, MOCK RECALLS, and RECALLS**

### **6.1 – Program Assessment and Expectations:**

Supply Base Partners (SBPs) shall have a traceability system implemented that can track information for Food Safety and Quality purposes on materials and services at any given point in their supply chain, from their suppliers through manufacturing to Campbell's facilities. SBP's traceability program shall also support initiatives that Campbell's has around bringing transparency to our Supply Chain.

### **6.2 – Personnel:**

1. SBP personnel shall be trained in and understand the importance of traceability on supply chain for materials and services they manage.
2. Have specific requirements in their job descriptions for the execution of traceability management.
3. Shall maintain traceability documentation and ensure all materials and services that have an impact on Food Safety and Quality can be traced.
4. Shall perform effective mock recall exercises and when necessary be able to properly manage a recall.

### **6.3 – Program Documentation:**

The SBP's system must be supported with procedures, documentation, and record keeping that can demonstrate its traceability program effectiveness and ability to quickly provide both the SBP and Campbell with critical traceability information. Traceability procedures, documents, and records must exist that include, but are not be limited to the identification, movement, and control of:

1. Suppliers – materials, origin of material, manufacturing location, lot numbers, approval status, receiving and usage dates, when appropriate secondary supplier data, etc
2. SBP's Internal processing/manufacturing – raw materials and packaging used, processing aids, work in process, rework, withheld or destroyed materials, lines used, plant locations, plant/material approval status, specifications, formulas, SBP's product sold to Campbell, date/time produced, responsible people, etc.
3. Storage/Transportation – SBP owned or 3<sup>rd</sup> party on behalf of the SBP. Shipping records. When and where dates for movement and storage of ingredient, packaging, and SBP's product to Campbell.
4. Customer – SBP's product name, type, quantity, lot#s, dates delivered, transportation service, etc.

### **6.4 - Mock Recalls:**

Supply Base Partners (SBPs) shall regularly test their traceability program and demonstrate the ability to effectively trace materials through SBP's supply chain, both forward and backward, by the completion of its own mock recall exercises. These Mock recall exercises shall:

1. Be inclusive of all critical materials and components.
2. Reconcile 100% of the material, it's movement, and location in the supply chain.
3. Take place when a change in the traceability system warrants verification.
4. Performed annually at minimum and within a 24 hour window from initiation. Record elapsed time.
5. Take corrective action based on the results of the exercise. Issues found in a SBP's traceability system during a mock recall must be corrected. Following the correction another mock recall exercise shall follow to ensure efficacy of the corrective actions.
6. Mock recall and corrective actions be documented, kept on file, and reviewed by management. They will be made available to a Campbell representative upon request.

Depending on the risk level of the SBP for Campbell an alternate frequency or format of mock recalls may be required, agreed upon, and documented between the two parties.



### **6.5 - Actual Recalls:**

The Supply Base Partner (SBP) shall have a recall procedure in place that describes the management of a real recall scenario and identifies the crisis team members responsible for the activities. This shall include a Campbell contact list.

1. Recall for SBP product - In the event that an actual recall is necessary for an SBP Campbell request advance notice for any SBP material impacting Campbell, preferably before it goes public.
2. Recall for Campbell branded product – In the event that an actual recall is necessary for an SBP producing a Campbell branded ingredient, package, or finished product the SBP shall never initiate a recall without prior authorization from Campbell.

## **7.0 – PEST CONTROL MANAGEMENT**

### **7.1 - Risk Assessment and Expectations:**

Each facility shall have a documented program in place that effectively assesses pest related risk and is designed to monitor and prevent all forms of pest activity. Risk assessment should cover critical factors that drive pest behavior, attraction, and harborage within the facility, operations, product, storage, and transportation activities. Risk assessment should also take into account, seasonality of pest activity, prior report findings, and any related customer complaint trends to drive program improvements. The program shall meet all Federal, State, and Local regulations and executed in a humane manner.

### **7.2 - Personnel:**

1. The program shall be managed and executed by trained, licensed plant personnel and/or approved outside contractors. Only certified pest control operators (PCO) or personnel with documented equivalent training shall perform pest control activities.
2. All personnel shall receive training on pest control risk relevant to their roles.
3. All personnel shall ensure that pest are excluded from the facilities, products, or services provided to Campbell.

### **7.3 - Program Documentation:**

Shall include, at minimum:

1. Who is the authorized service provider.
2. Pest control operator (PCO) license with expiration date, certification, and training details
3. Pesticide applicator's proof of insurance.
4. Description of services covered and frequency executed – inspections, treatments, etc.
5. Procedures and work instructions for the execution of the program.
6. Identifications of type and placement of devices. Current site map with numbered pest control device locations. This includes the use of temporary devices.
7. A complete list of the chemicals used at the facility for pest control activities.
8. Copies of labels, government registration numbers, and Safety Data Sheet (SDS) or equivalent for all pest control chemicals used and/or stored at the facility. This includes instructions on safe usage and proper application of these chemicals.



#### **7.4 - Operational Activities and Records:**

Shall include, at minimum:

1. Compliance to the defined procedures and work instructions for the proper execution of the program.
2. Activities performed for the identification, prevention, and exclusion of pest from the SBP facility, materials, product, or services offered.
3. Reporting:
  - a. Completed reports that identify dates of PCO services and types of PCO services performed.
  - b. Document whom performed PCO service.
  - c. Document all findings by PCO which include evidence of pest activity (i.e. insects, rodent droppings, trap and/or bait station activity, etc.) and trending analysis by location.
4. Corrective Action: Plans are defined and actions taken to address PCO findings. If insect/rodent infestation is identified, immediate actions shall be taken to eliminate the hazard. Any infested product/material shall be controlled in such a way as to prevent the potential contamination of other product/material, the facility, and surrounding area.
5. Audits of the program by management to verify the programs overall effectiveness shall take place. Results of the audit shall be documented, and as necessary, used to update and improve the pest control program as part of management review.

#### **7.5 - Pest Control Devices:**

1. The placement shall be in such way as not to present a contamination risk to ingredients, products, packaging, or processing equipment.
2. All devices shall be clearly identified, numbered, and recorded on a map.
3. PCO Service shall be recorded on the inside of the devices via service card or electronic scanning/tagging.
4. Any missing or damaged devices shall be noted, investigated, and replaced.
5. Rodent catch traps, insect electrocution (insectocutor)/fly-killing/insect trapping devices, pheromone traps, sticky/glue boards, and other pest/insect control devices shall be placed in the interior of the facility and serviced at regular intervals and as activity warrants. Interior devices shall not contain poisonous or toxic bait unless instructed to do so by local regulations.
6. Insect electrocution (insectocutor)/fly-killing devices shall not be located directly above or within 5 feet (1.5 meters) of open processing equipment, handling areas, and ingredient storage areas and shall be fitted with tubes coated in a shatterproof material or housed within a protective outer tube of suitable alternative material. Glue boards shall be present in the devices.
7. Bait stations shall be placed around the exterior perimeter of the building. These exterior devices shall be tamper resistant, locked, and anchored/secured in place; and shall be serviced at regular intervals and as activity warrants. In addition, steps shall be taken to minimize the presence of animal, wildlife, and birds on the property, especially near the buildings and parking lots of commercial vehicles.

#### **7.6 - Pest Control Chemicals Selection and application:**

The use of pest control chemicals (pesticides, insecticides, fungicides, rodenticides, and fumigants) shall be:

1. Appropriate for the application, follow all label instructions, meet tolerance limits, and be in compliance with governing laws and regulations.
2. Documentation on chemical usage and application shall include: person applying, type applied, quantities and concentrations used, areas treated, target pest, and the appropriate regulatory registration number as required by law.
3. The use of unregistered or unapproved chemicals for pest control application is prohibited.
4. Pest control chemicals must be properly labeled. Storage must be done in a secure manner to prevent misuse or product contamination.
5. Only personnel meeting local regulatory requirements for registration, certification, and/or licensing may apply pest control chemicals.



## **8.0 – FACILITY FOOD SAFETY and SANITARY DESIGN**

### **8.1 - Risk Assessment and Expectations:**

Food Safety and Sanitation design shall be integral components of the design, development, alteration, or modification of a facility that produces, stores, or generally manages any type of ingredient, food product, and packaging. Facilities shall take steps to assess and regularly review the Food Safety and Sanitary design risk associated with their facilities and equipment to drive improvement efforts in these areas through capital projects and other means. The designs shall minimally comply with any Local and Federal regulations governing Food Safety and Sanitation management.

### **8.2 - Personnel:**

1. Receive training on relevant topics related to Food Safety and Sanitary design.
2. Demonstrate behaviors and practices that are consistent with and support the expectations set forth in this section of the standard.

### **8.3 - Program Documentation:**

Shall at a minimum have:

1. Have an updated plant layout that includes all entrances, exits, roof access, rooms, equipment, and grounds.
2. Process/Manufacturing/Service flow chart(s) for the movement of materials, people, products, and services.
3. Capital project list that includes projects related to Food Safety, Quality, and Sanitary design improvements for the facility, equipment, and SBP business.
4. Documented management reviews that show consideration and decision making on design improvements for Food Safety, Quality, and Sanitary design.
5. Records that demonstrate successful implementation of design improvements are/have been taking place.

### **8.4 - Facility and Equipment:**

Designs shall include but not be limited to:

1. Shall be designed with a logical flow for air, materials, products, equipment, personnel, and waste to reduce risk and eliminate product contamination. The flow shall take into consideration and prioritize any possibility of cross-contamination between materials and finished product.
2. Construction/maintenance work shall be effectively managed and temporary structures (if used) designed, constructed, located, and adequately controlled in order to prevent product contamination and maintain food safety.
3. Food handling equipment (machines, belts, tanks, elevators, etc) shall be made of materials approved for food contact. They shall be of solid construction, smooth, and free of contamination risk points like rough welds and dead spots. Food grade stainless steel should be used whenever possible and appropriate for the application.
4. Walls and floors shall be designed for easy cleaning and free of pits, cracks, and crevices. Wood or other porous materials should not be used in wall or floor construction, especially in product zones. Corner coping should be used to avoid 90 angles between wall and floors.
5. Drains shall be designed to allow the flow of waste freely and be easily cleaned. They shall be maintained to prevent build up, odors, and pest harborage.
6. Ceilings and overhead structures shall be designed for easy access and cleaning. They shall be maintained in good condition, be free of rust, peeling paint, plaster, dust, debris, cobwebs, mold, etc. Roof leaks shall be identified, controlled, and fixed in a timely manner.
7. Stairs, catwalks, platforms, pipes, ducts, fixtures, and conduits shall be located, designed, and maintained in a manner that does not contaminate food, food-packaging materials, food contact surfaces, or processing tools or equipment.



8. Doors, hatches, and windows shall be able to properly seal and protect materials. They shall be maintained in good condition, kept clean, and closed when not in use. Windows within or adjacent to manufacturing, handling, and storage areas shall be made of polycarbonate, acrylic, shatterproof material, or covered in protective film.
9. Fans and air-blowing equipment shall be located, maintained, and operated in a manner that minimizes the potential for contaminating food, food-packaging materials, food contact surfaces, and equipment. Air blowing equipment shall be fitted with properly filtering systems.
10. Lighting shall be appropriate to permit activities in an area to take place safely. Light fittings shall be shatterproof or protected by a shatterproof covering. Emergency lighting, forklift lights, and other work lights shall be adequately protected or controlled.
11. Cleaning stations and Waste handling areas shall be designed to prevent contamination of product zones. Waste shall be segregated, stored, and disposed in a way of as to minimize the development of odor and the potential for the waste becoming an attractant, harborage, or breeding place for pests; and protect against contamination of food ingredients, packaging materials, food contact surfaces, water supplies, and ground surfaces. Accumulation of waste shall not be allowed in ingredient, packaging, food handling, or food storage areas. Waste shall be removed from these areas at least daily or as often as necessary to prevent accumulation.

#### **8.5 - Water, Ice, Steam, and Air Management:**

Designs shall include but not be limited to:

1. Potable water (including ice and steam) shall be readily available, of suitable temperature, and sufficient pressure to meet the needs of the operation.
2. Only potable water (including ice and steam) shall be used for activities involving food, food contact surfaces and equipment, food storage and handling areas, cleaning and sanitizing, and hand washing.
3. Potable water (including ice and steam) shall meet all relevant national and local safety standards, including for chemical and microbiological specifications. Potable water shall have no cross connections or risk back-siphonage with non-potable water sources or other liquids.
4. Where potable water (including steam) is introduced into food or come into contact with food or food contact areas backflow prevention devices shall be installed. These devices shall be tested at a minimum annually by qualified personnel or third party service provider.
5. Systems to store or convey potable water, whether in gas, liquid, or solid form, shall be designed and maintained to ensure chemical and microbiological specifications are met at all times.
6. Steam sources shall be adequately ventilated or equipped with condensate/steam traps as close as possible to the point of use to minimize condensation.
7. Potable and non-potable water lines shall be clearly identified.
8. Boiler system chemicals shall be approved additives which meet relevant specifications and are compliant with local regulations for use in water intended for human consumption.
9. Compressed air, carbon dioxide, nitrogen, and other gas systems used in manufacturing, cleaning, and/or filling operations shall be approved for food contact use. They shall be designed to filter and remove particles of 0.01 micrometers (microns) or larger with 99.999 DOP efficiency. They shall not contain oil or water.
10. Filter and filter systems shall be routinely inspected and changed as necessary. The effectiveness of filtering shall be verified at points of use at regular intervals for direct and indirect food contact use.

#### **8.6 - Environmental Surroundings:**

Designs shall include but not be limited to:

1. Grounds and perimeters shall be maintained to minimize dust and be kept free of litter/rubbish, waste, debris, accumulated equipment and pallets.
2. Environmental surrounding shall be periodically examined for evidence of strong odors or airborne contaminants to ensure food safety and quality is not or cannot be compromised.
3. Vegetation shall not be within 16 in (40 cm) from any building and shall be kept low.



## **9.0 – SUPPLY BASE MANAGEMENT and MATERIAL/SERVICE CONTROLS**

### **9.1 – Program Assessment and Expectations:**

Supply Base Partners (SBPs) to Campbells shall ensure they have a program in place for Food Safety and Quality management of their own network of SBPs and services. Any secondary or prior source the SBP uses that is directly connected to Campbell's supply chain and/or product received must also comply with the Food Safety and Quality requirements and expectations as detailed in this manual. The SBP must establish traceability and transparency to support visibility to Campbell's entire Supply Chain as well as our responsible sourcing objectives.

### **9.2 Personnel:**

1. Shall be trained in supplier evaluation and selection processes.
2. Must ensure they assess the supply base for Food Safety and Quality expectation compliance.
  - a. Systems - 3<sup>rd</sup> party audits and on-site audits/visits
  - b. Materials/Services – evaluations/inspections, performance data, and metrics.
3. Must select and use only SBPs that meet specifications/expectations.
  - a. Actions plans shall exist and exit strategies executed for underperforming SBPs

### **9.3 – Program Documentation:**

SBPs shall have a documented program in place to ensure:

1. Specifications for the SBP's own network of SBPs exist.
2. Food Safety and Quality standards are established for the SBP. Have a documented method to deliver these standards to the SBP.
3. Supplier selection criteria and decision making shall be documented.
4. A list of approved suppliers and facilities is maintained. This list shall be shared with Campbells upon request.
5. Documented Food Safety and Quality risk assessments of suppliers and materials/services are performed.
6. Periodic evaluation of the supplier's facilities which includes 3<sup>rd</sup> party and SBPs own audits/visits of those facilities.
7. Evaluation of incoming SBP material/services for conformance to specifications and regulations take place. This includes a documented process to hold, disposition, and dispose of materials that do not meet specifications.
8. Manage supplier performance of SBPs for continuous improvement. This includes but is not limited to, supplier non-conformances, audit results, and corrective actions trending, metrics, and regulatory violations.
9. Communication to Campbell when a SBP Food Safety or Quality issue occurs that may impact Campbell.



## **10.0 – NOTIFICATION OF OUTSOURCED PROCESSES and SERVICES**

### **10.1 – Program Assessment and Expectation:**

Supply Base Partner (SBP) shall have a process in place to notify Campbell of any products, ingredients packaging materials, or services supplied to Campbell which are produced in a facility not wholly owned and/or operated by the SBP.

### **10.2 - Personnel:**

1. Shall establish a point person, and in some cases by departmental function, to ensure communication occurs with the appropriate Campbell counterpart in the business relationship.

### **10.3 - Program Documentation:**

Shall include, at a minimum:

1. Campbell's advanced written approval of outsourcing to a subcontracted SBP.
2. Facilities contracted by SBP must meet the requirements of this manual and all specifications for products, ingredients, packaging, or services. Prior to use, they shall also consent to be audited by representatives from or on behalf of Campbell as a condition of doing business.
3. The SBP shall require their subcontracted SBP to carry the same insurance coverage and assume the same indemnification of Campbell as the primary SBP. In addition, no assumption of liability by the SBP shall negate the primary SBP's responsibility to Campbell to indemnify and insure against any and all claims resulting from the actions of any subcontracted SBP.





## **11.0 – MANUFACTURING, PROCESSING, SERVICE, AND REWORK CONTROLS**

### **11.1 – Program Assessment and Expectations:**

Supply Base Partners (SBPs) shall have manufacturing, processing, and service programs that ensure products and services meet all Campbell Food Safety, Quality, and material specification requirements. They shall also maintain compliance to all applicable laws and regulations.

### **11.2 – Personnel:**

1. Shall be trained and understand the manufacturing, processing, and services they are responsible for per their job descriptions.
2. Job descriptions shall exist and include Food Safety, Regulatory, and Quality expectations.
3. Shall ensure Food Safety, Regulatory, and Quality objectives, targets, and needs are met.

### **11.3 – Program Documentation:**

The programs shall include but are not limited to:

1. Specifications:
  - a. Ensure written specifications/contracts for materials and services exist that cover Food Safety, Quality, and Regulatory requirements.
  - b. A method for change control and approval of specifications.
    - This includes notification to and approval from Campbell when appropriate for the supply chain relationship agreement.
2. Operational / Service Controls:
  - a. Procedures, work instructions (WI), product requirements, and specifications that define key activities.
  - b. Scientific justification and studies for decision on any critical activities that control Food Safety “Kill Steps”, allergens, or sanitation.
  - c. Processes that are in control and proven capable of meeting specifications through appropriate Statistical Process Control (SPC) methodology, systems, data, and records.
  - d. Incoming material, in-process, and finished products/services inspected and tested to ensure on-going conformance to requirements and specifications. Data shall be shared with Campbell in the form of a Certificate of Analysis (COA) or other format as agreed to by contract and/or specification.
  - e. Documented process for hold and releasing of product or services.
  - f. Trained employees that have access to and can demonstrate competency on documented procedures and work instructions.
  - g. Records must be kept for process/service data, inspections, and testing results.
  - h. Tracking and trending of Statistical Process Control (SPC) data and specification performance that manages on-going process, service, material, and product improvement.
3. Rework:
  - a. Supply Base Partner (SBPs) shall have a documented program that defines and controls the use of reworked material to the process, service, or product. It shall consider the risk of physical, biological, chemical, or allergen contamination that can occur through rework handling. Handling shall not result in a food safety issue and/or have a negative impact on Quality.
  - b. Procedures and work instructions on how to properly and safely handle rework. This shall include the type of rework that is generated, what formulas it may be used in, and the % of rework allowed.
  - c. Trained personnel that evaluate and document the use of every rework batch to ensure it is used safely.



- d. Rework shall follow a “like into like” material approach. Where it does not there shall be documented justification for it that validates it does not impact Food Safety (allergen content, label, specification, or performance).
- e. Rework should be used during the same lot number it was generated. Where it is not it shall be treated and tracked like any other incoming material. The % of rework used shall be captured as part of the production record.
- f. Rework labeling - identified with the product name, production date, and original lot number(s) in order to maintain full traceability for every batch of reworked created. Rework containing allergens shall be clearly identified.
- g. Rework shall be segregated from other materials and products either via an inventory management system or physical separation.
- h. Rework shall only be stored under conditions (i.e. temperatures) and for a period of time that has been verified as safe to prevent deterioration or a Food Safety/Quality issue.

## **12.0 – PACKAGING**

### **12.1 – Assessments and Expectations:**

Supply Base Partners (SBP) shall have documented systems in place to ensure packaging complies with Food Safety, Quality, Regulatory requirements, Campbell standards, and specifications.

### **12.2 – Personnel:**

1. Shall be knowledgeable in packaging, packaging requirements, and packaging operations.
2. Shall ensure that packaging or packing operations do not become the source of food safety or Quality issues.

### **12.3 - Ingredient, Food Contact, or Primary Packaging:**

Materials shall minimally:

1. Have specifications that identify the parameters of the packaging components. Items shall be made of materials appropriate for use in food manufacturing, handling, and transportation. Specifications shall also identify when recycled material is present.
2. Designed to avoid the risk of food safety issue. This includes microbiological, chemical, foreign material contamination, or allergen cross contamination issues.
3. Prevent the degradation of Quality or performance of the food item.
4. Be designed to keep the number of components present in the packaging at a minimum to reduce risk of these components becoming a foreign material issue.
  - a. High risk items like wires, staples, clips, clear ties, etc. shall not be used in the construction or for closure purposes. Heat seal/weld, folded, or knotted liners preferred.
5. Designed to avoid damage, tearing, or splitting at any point in the process.
  - a. Gauge or flute selection shall be of an appropriate thickness.
6. Allow for detection (visually through color, metal detectability, etc.) should the packaging contaminate a Campbell process.
7. Provide some level of tamper evident detection in design.
8. Perform properly when used in manufacturing and storage.

### **12.4 - Secondary packaging:**

Materials shall minimally:

1. Have specifications that identify the parameters of the packaging components. Items shall be made of materials appropriate for use in food manufacturing, handling, and transportation. Specifications shall also identify when recycled material is present.
2. Designed to avoid damage, tearing, or splitting at any point in the process.
  - a. Gauge or flute selection shall be of an appropriate thickness.
3. Perform properly when used in manufacturing and storage.



## 13.0 – CODING AND LABELING CONTROLS

### Definitions:

Coding	Word, letter, number, or other symbol used in a coding system to mark, represent, or identify.
Label	A slip of paper or other material, marked or inscribed, for attachment to something to indicate its manufacturer, nature, contents, usage, ownership, destination, etc.

### 13.1 - Risk Assessment and Expectations:

Each facility shall have a documented program in place that effectively assesses the needs for coding, bar coding, and labeling as materials move through the supply chain - from supplier to manufacturing/services to Campbell. Coding, bar coding, and Labeling shall support and reflect the needs of an effective traceability and material identification system.

The program shall meet all Federal, State, and Local regulation as well as Campbell requirements. Campbell may detail additional requirements for Campbell branded product coding, bar coding, and labelling in the form of specification and/or separate instructions. Campbell trademarks shall not be used in any manner except as pre-approved in writing by the Campbell Legal Department. SBP will have a process to manage the communication of this information.

### 13.2 - Personnel:

1. The program shall be managed and executed by trained personnel and/or approved outside contractors.
2. Shall ensure proper coding, bar coding, and labelling occurs for materials and services.

### 13.3 - Program Documentation:

Shall include, at minimum:

1. Who is authorized to set up, perform, and verify the coding, bar coding, and/or labeling of material and services. Training records shall exist.
2. Procedures and work instructions for the execution of the program to explain how personnel perform proper coding, bar coding, and labeling activities
  - a. Preparation and maintenance: Set up/calibration/certification/maintenance of the equipment, line, and product for coding and labeling.
  - b. Verification and Inspection: Verification and real time inspection procedures shall be in place to ensure correct application, prevent inadvertent mislabeling, verify the correct code, and/or label version based on the product formulation or material.
  - c. Mix prevention: Upon completion of production/assembly all associated materials shall be removed from the line prior to the next run and secured. The line shall be inspected for complete clearance of all previous labels/labeled packaging and product. This shall include the labeling equipment, coding equipment, and the surrounding area.
  - d. Destruction: For unused, obsolesced, or incorrectly labelled or coded material. Shall include instructions on the method of destruction. Destruction accounting shall be performed and recorded.
3. Clearly explain and include appropriate identification method for type of device(s) used as well as map of their placement. This includes the use of temporary devices.

### 13.4 - Operational Activities and Records:

Shall include, at minimum:

1. Compliance to the defined procedures and work instructions for the proper execution of the program.
2. Standard Identifiers applied:
  - a. Product: Product names and codes (Material or Corporate number).
  - b. Manufacturing/Service: Lot numbers, production codes, manufacturing plant designation, date code, line code, name of the manufacturer and location.



- c. Contents: Ingredient statement, net contents statement, temperature requirements.
  - d. Shelf life indicator: Expiration, best before date, or use by date.
  - e. Coding, bar code, and Labeling conspicuously marked on each unit. Comply with regulations for size, visibility, and placement as appropriate. Scanner readable if required.
3. Recommended default is a clear Date of manufacturing and Expiration/Best Before calendar format similar to (DDMMYYYY, where D= 2 digit day, M= Alphabetically abbreviated 3 digit month, and Y is full 4 digit year preferred).

Month Coding (MMM)

January = JAN	April = APR	July = JUL	October = OCT
February = FEB	May = MAY	August = AUG	November = NOV
March = MAR	June = JUN	September = SEP	December = DEC

Example for DD MMM YYYY = 01 JAN 2019 and NOT 01 01 2019"

- 4. Records: of activities performed for the preparation, verification, mix prevention and destruction.
- 5. Reporting: Reporting of deficiencies and violations of compliance.
- 6. Corrective Action: Plans are defined and actions taken to address coding and labeling issue findings.
- 7. Review and audits: Reviews and audits of the program by management to verify the programs overall effectiveness shall take place. Results of the audit shall be documented, and as necessary, used to update and improve the coding and labelling program.
- 8. Campbell Quality will advise the SBP of any specific coding and labeling requirements through contracts and specifications.

**13.5 – Coding, Bar code, and Labeling Control Devices:**

- 1. Clear identifications of coding, bar coding, and labeling devices, including temporary devices shall be completed.
- 2. The application and placement of a code, bar code, or label shall be done in such way as not to present a contamination risk to ingredients, products, packaging, or processing equipment.
- 3. Devices must function properly to ensure legible and clearly identified markings are present as a result of the coding and labeling activities.
- 4. Maintenance/Certification/Calibration activities are performed and documented.
- 5. Where appropriate, vision detection systems and bar code readers shall be in place and functioning.



## 14.0 – SANITATION AND ENVIRONMENTAL MONITORING

### Definitions:

Clean	Free from/removal of dirt, stain, and/or impurities; unsoiled.
Sanitation	The implementation of hygienic principles for the purpose of food protection, food safety and employee welfare. It includes cleaning of equipment and structures for prevention of contamination from food residues, foreign materials, chemicals, biological, and microbiological contaminants.
Sanitation Performance Standard	A set of criteria that are established to define acceptable levels of sanitation for the intended result (i.e. visibly clean, allergen clean). They are the “standard” to be achieved for verification and validation.
Sanitation Standard Work	Also known as: sanitation standard operating procedures (SSOP). It is a detailed, documented, visual system with a series of predefined process steps to ensure cleaning that meets sanitation performance standards. It is the document used for training and certification of an employee. It is designed to reduce variability, reduce waste, reduce costs and improve productivity.
Sanitize	Reduction in the number of vegetative microorganisms; ability to reduce specific vegetative pathogens (i.e. <i>Staph</i> and <i>E. Coli</i> ) by 5 logs within 30 sec at ambient temperature, performed after a thorough cleaning.
Validation	The process of collecting and evaluating data to determine whether the sanitation procedures, when properly implemented, will achieve the appropriate sanitation performance standard. Validation occurs only periodically.
Verification	Process of confirming that the validated Sanitation Standard Work is consistently meeting the requirements of the sanitation performance standard. Verification occurs routinely.

### 14.1 - Risk Assessments and Expectations:

Supply Base Partner (SBP) shall perform a risk assessment to identify and monitor the critical points of the sanitation process such as temperatures, chemical concentrations, flow rates, time, pH, etc. Where appropriate Sanitation Preventative controls shall be established as part of the Food Safety Plan (FSP) or as a part of the pre-requisite program. This assessment shall be kept current and consider changes to the facility, equipment, and process as they occur. Minimally, an annual review of the program shall occur. In food manufacturing or handling facilities that assessment shall determine the need for a microbiological Environmental Monitoring Plan (EMP).

### 14.2 - Personnel:

1. Shall be trained in and understand the principles of cleaning and sanitation.
2. Only trained/qualified employees or contractors shall perform sanitation or EMP activities.
3. Training records shall be maintained.
4. Shall effectively execute and ensure proper sanitation takes place to protect materials and services from Food Safety, Quality, and Regulatory issues.

### 14.3 - Program Documentation:

A documented sanitation program shall, at a minimum:

1. Meet all sanitation requirements set by regulation.
2. Have appropriate sanitation performance standards for the operation.
3. Establish schedules for cleaning and sanitation activities, including master sanitation schedule (MSS), based on industry standards, regulatory requirements, manufacturer’s recommendations for specific pieces of equipment, and the evaluation of the effectiveness of these activities.
4. Documented Sanitation Standard Operating Procedures (SSOPs) specific to their production areas, processing equipment, other areas/parts of the facility, and services. They are to be in-line with the risk associated with products being manufactured or handled.
  - a. SSOPs shall be detailed and include description and scope of the cleaning procedures, equipment and products, and responsible parties.



- b. SSOPs shall have corrective actions for when the desired sanitation performance standard is not achieved.
- c. SSOPs shall be validated and verified at minimum annually to assess the cleaning and sanitation effectiveness. Test methods should also be chosen based on relevance for assessing sanitation performance and fit within the manufacturing facility.

#### **14.4 - Operational Activities and Records:**

1. Facility and/or equipment designed to allow for effective and efficient cleaning and sanitizing.
2. Tools and utensils must be suitable to and dedicated for intended use. They shall be clean and properly maintained. Color coding system is highly recommended.
3. Cleaning, sanitation, production, and non-food contact tools and utensils shall be properly segregated and stored in a clean, sanitary manner.
4. A system for verifying and documenting the effectiveness of the sanitation program shall be in place (audits, EMP swabs, ATP, CIP, COP, allergen, other). Review and auditing of the cleaning program shall include annual review of verification and validation.
5. Accurate written records of all cleaning and sanitation activities shall be maintained. Must document % of scheduled work completed.

#### **14.5 - Cleaning Chemical Selection and Use:**

1. Only cleaning and sanitizing chemicals that are approved for use in food manufacturing facilities shall be used. They shall be used for the specific intended purposes and in accordance the chemical manufacturer's label.
2. Cleaning and sanitizing chemicals shall be properly labeled and stored under locked conditions.

#### **14.6 - Environmental Monitoring Program (EMP):**

In facilities where environmental factors may lead to risk of microbial pathogen contamination of food materials that will be used in RTE products without further processing, or are RTE products exposed to the environment prior to packaging, an EMP must be established as part of the facility's Food Safety program.

The documented program shall include but is not limited to:

1. Facility-specific EMP risk assessment.
  - a. Justification for and specifying the pathogen(s) of concern (at a minimum both *Salmonella spp* and *Listeria spp* must be considered).
  - b. Establish hygienic zoning of the facility using zoning classification (zones 1 – 4)
    - i. Adequate number of routine sample sites identified and a sampling frequency established.
    - ii. Re-evaluated sites based on historical data and at least an annually.
    - iii. Sites should be changed as appropriate to ensure comprehensive coverage of facility.
    - iv. Include identification and swabbing of mobile items if applicable
      1. A plan for hold and release of the swabbed mobile item based on results.
2. Sampling and Testing:
  - a. Routine swabs are taken at least 3-4 hours after start of production.
  - b. Swabs are held or transported under chilled conditions. Do not freeze swabs.
  - c. Tested within 24 hours of sampling by a qualified laboratory using an AOAC approved enrichment-based method.
3. Corrective Action:
  - a. In the event of presumptive positive swab results, an intensified sample procedure is implemented with appropriate vector swabbing.
  - b. Intensified swabbing is implemented in response to roof leaks, drain backups and construction events within manufacturing areas.
  - c. A robust program diligently finds the pathogen of concern so that corrections can be made *before* product is compromised. Seek and destroy mentality shall be applied to prevent resident niches within facility.
4. Records:
  - a. Program swabbing records shall be maintained and shall include but not be limited to date, initials, location, zone, results and corrective actions.



## 15.0 – STORAGE, WAREHOUSE, TRANSPORTATION, and DISTRIBUTION

### Definitions:

Storage and Warehouse	Includes facilities where material is received to or shipped from. A location where material is stored or held, for short or long periods of time.
Transportation and Distribution	The process of moving material from one location to another. Includes formats such as trucks, ships, planes, and railroad.
Food Transportation	Any means of moving, relocating, or otherwise transporting food, food contact packaging, or other materials used for food by land, by sea, or in the air.
Food Transportation company	A company or party who provides transportation services for food, food contact packaging, or other materials used for food.
Food Transportation Vehicle	A tanker, trailer, railcar, container used to transport food, food contact packaging, or other materials used for food. Bulk transport is when food comes into direct contact with the transportation vehicle surfaces.

### 15.1 - Risk Assessments and Expectations:

Supply Base Partners (SBPs) shall ensure that storage, warehouse, transportation, and distribution services are managed in a manner to maintain product Food Safety, integrity, Quality, and prevent contamination and/or degradation of materials. Stand alone storage and warehouse facilities are subject to the broader relevant SBREM requirements. Refer to the Requirements matrix at the beginning of this standard for detail.

### 15.2 - Personnel:

1. Shall be aware of Food safety, Regulatory, and Quality requirements and execute activities to ensure compliance.
2. Only trained/qualified employees or contractors shall perform storage, warehouse, transportation, or distribution activities
3. Training records shall be maintained.

### 15.3 – Program Documentation:

Shall include, at minimum:

1. Who is authorized to perform storage, warehouse, transportation, and distribution activities by role and title.
2. Procedures, work instructions, and records for the execution of the program to explain how personnel perform and manage proper storage, warehousing, transportation, and distribution activities:
  - a. Shipping and Receiving:
    - i. Identification of product, lot numbers, quantities.
    - ii. Approved suppliers/transportation list.
    - iii. Inspections needed, performed, and documented.
    - iv. Release of material for internal use or shipment.
    - v. COA management.
    - vi. Temperature sensitive materials and deviations of temperatures.
  - b. Storage and Warehousing:
    - i. Clear and proper product identification, lot number designation, and location, quantities
    - ii. Inventory cycle counts, stock rotation/ First In First Out (FIFO), First Expired First Out (FEFO), and reconciliation for traceability and recall preparation.



- iii. Damage inspection and management.
- iv. Allergen separation and management.
- v. Pest control program.
- vi. Temperature sensitive materials and deviations of temperatures.
- c. Transportation/Distribution:
  - i. Inspection protocols for transportation vehicles.
  - ii. Approved prior shipment materials list.
  - iii. Wash/Clean out requirements/certificate management.
  - iv. Max weight requirements.
  - v. Pallet/Material configurations for integrity of material during shipment.
  - vi. Temperature sensitive materials and deviations of temperatures.

#### **15.4 - Shipping and Receiving Operational Activities and records:**

- 1. General:
  - a. All products shall be inspected prior to loading to ensure damaged, contaminated, or incorrect product is not shipped. Records maintained.
  - b. Lot numbers shipped per each shipment shall be kept to a minimum, ideally no more than one lot per pallet, and no more than two lot numbers per shipment.
  - c. All materials shall be delivered with no less than 50% of their shelf life remaining at the time of delivery to Campbell's. Specifications shall reflect this minimum requirement unless otherwise stated at another specific percentage in the Campbell's purchase specification.
  - d. Campbell will not accept deliveries:
    - i. With products in the same vehicle as non-food chemicals or other potentially hazardous materials
    - ii. With fresh/frozen vegetables in the same vehicle as fresh/frozen meat products
    - iii. If the food transport vehicle may have been contaminated by poisonous, toxic, hazardous, dangerous, unsanitary materials, allergen cross-contact, or otherwise tampered with.
    - iv. If upon receipt inspection indicates a Food Safety or Quality concern with the material, service, or vehicle.
    - v. If information, documentation, or traceability about the material, service, or load is not correct or identifiable.
    - vi. Excessive lot numbers are sent.
- 2. Product and Bill of Lading/Packing List:
  - a. Must include the following information on both material and shipping documents:
    - i. Product Name
    - ii. SBP name and manufacturing location
    - iii. Campbell Product/Material Number (full numeric code)
    - iv. Lot/Batch Numbers
    - v. Quantities per each lot/batch number
    - vi. Date of Manufacture and Expiration/best before date for each lot/batch
  - b. Any and all transfers of materials between original manufacturer and another Supply Base Partner(SBP) must maintain traceability information. The last SBP point of contact shall ensure all new documentation generated meets these expectations and carries original data through to Campbell at the time of reception at a Campbell facility.
- 3. Material Shipping Waiver:
  - a. Shipping material out of specification and/or without micro clearance completed is not permitted; however, in the rare event that an exception could be granted or requested, this must be conducted in a controlled manner with the Campbell Plant Quality Manager, BU Supply Quality Lead, and/or Corporate Food Safety/Microbiology signing off on approval.
  - b. The material shall be labeled on all four sides with red tags as "On Food Safety HOLD" or have some similar obvious designation on packaging/pallet.





### **15.5 - Storage and Warehouse Operational Activities and records:**

1. General:
  - a. Must comply with applicable GMPs from Section 3.0 GMPs.
  - b. All materials shall be stored off the floor and away from walls (recommended distance =  $\geq$  18 in./0.5 m).
  - c. Bulk storage facilities shall be designed to minimize the risk of foreign material contamination and unauthorized access.
  - d. If offsite storage/warehouse (dry storage, freezer, cooler) is to be used by the SBP the facility is subject to approval by Campbell which may include an inspection or audit by either a representative from or on behalf of Campbell.
2. Racking:
  - a. Racking material shall have a smooth, non-absorbent surface that is free from crevices and easy to clean.
  - b. Designed for ease of stock rotation, material identification, and FIFO/FEFO management.
3. Conditioned Storage or Warehousing facilities:
  - a. Refrigerated/chilled/frozen storage shall be designed to permit the hygienic and efficient temperature control of food. Food shall not be exposure to temperature risk or abuse.
  - b. Storage areas shall be capable of maintaining product temperature and/or humidity as defined by regulations and/or Campbell specifications.
  - c. Proper temperature monitoring systems or devices shall be in place, temperatures monitored, and trended. Alarmed for temperature abuse detection. Alternatively regular manual monitoring may occur as long as it is done every 4 hours minimally and documented.
  - d. Documented procedures shall be in place for the management of refrigerated/chilled/frozen product when transferring between and outside of temperature controlled areas is necessary. Deviations shall be documented, held, and properly dispositioned.

### **15.6 - Transportation and Distribution Operational Activities and Records:**

1. Food transportation company:
  - a. Can demonstrate and complies with industry and regulatory Food safety transport requirements.
  - b. When SBP manages the transportation to Campbell the SBP will maintain an approved list of transportation companies and ensure compliance to the SBREM.
  - c. Transportation companies will manage a list of materials NOT approved to be shipped with food and prior load procedures/records.
  - d. Must comply with applicable GMPs from Section 3.0 GMPs.
  - e. Receive and perform on-going GMP, hygiene, Quality, Food Safety and Food Security training. Demonstrate that employees handling/ transporting food products have documented training in these areas.
  - f. Has Food Safety and Food Security control procedures in place that are actively monitored and documented.
2. Loading/Unloading:
  - a. Before loading, all food transport vehicles shall be inspected and results documented.
  - b. Loading and unloading practices shall be designed to minimize unnecessary exposure of products to conditions detrimental to maintaining product and package integrity.
  - c. Loading and unloading areas/ramps shall have protection devices in place to shelter the products from external elements (climate, pollen, dust, etc.) and pest.
  - d. Loading/Unloading lines, hoses, caps, hatches and all related devices/tools shall be kept clean and secure to prevent food safety contamination and/or tampering with the food product.
  - e. All loads must be adequately secured to prevent tampering. When appropriate locks and seals applied. They shall be checked and verified against BOL seal numbers.
  - f. When products must be transported at a specified temperature range, before loading, the temperature inside the food transport vehicle shall be checked and documented.





## 16.0 – EXTERNAL INCIDENT, NON-CONFORMANCE, & COMPLAINT INVESTIGATION

### Definitions:

External Incident	This is categorized as a general incident that may occur in the Industry, social media, or Regulatory based that has raised some concern or issue with potential Food Safety, Food Fraud, or Quality implications. It may be as simple as an inquiry or have the potential to be escalated to the crisis management team depending on impact.
Non-Conformance	A non-conformance is a specific defect or non-conformity that has been identified with an ingredient, packaging material, or service provided directly to Campbell or one of its affiliates. Typically, from a manufacturing plant for a material specification or SBREM issue.
Complaints	A claim of dis-satisfaction from one of Campbell's customers or consumers which require investigation to determine the validity and potential root causes for corrective action. This could be Food Safety, Quality, or service based.

### 16.1 – Risk Assessment and Expectations:

Supply Base Partners (SBPs) shall ensure that they stay current with issues impacting and opportunities around their industry on Food Safety, Food Fraud, and Quality. They shall ensure the timely and effective resolution of all incidents reported by or related to their supply of Campbell.

### 16.2 - Personnel:

1. Shall be trained to identify, collect, analyze, investigate, and resolve external incidents, non-conformances, and complaints.
2. Ensure a successful resolution of the incident/issue occurs which meet Campbells expectations.

### 16.3 - Program Documentation:

Supply Base Partners (SBPs) shall have a documented program how they manage external incidents, non-conformances, and complaints. The program shall include but not be limited to:

1. The method of receiving information and documenting the issue.
2. Assign responsibilities, a point person, and a team if necessary.
3. Conducting a risk assessment on scope of issue and impact.
4. Performing an investigation:
  - a. If a valid issue exist then identify a root cause and perform a corrective action.
  - b. Determine disposition of material or service.
  - c. All aspects of the investigation shall be properly documented.
5. Metrics shall be kept and trends evaluated to improve Food Safety, Regulatory and Quality.
6. Effectively communicating results internally and perform management reviews of each of the 3 categories of this program.
7. Have a method for external follow up that includes notifying Campbell immediately if Campbell is impacted. Closing the loop is necessary for all Campbell initiated investigation request.

### 16.4 - Non-Conformances – Materials and Services provided to Campbell:

Classifications:

1. Minor – A concern but no formal follow up is required with Campbell. Repeats lead to escalation of the issue so the SBP is expected to resolve the issue prior to another incident.
2. Major – A potential risk has been identified with the material which requires formal follow up with Campbell within 10 days. Campbell's Supplier Corrective Action Form (SCAR) must be completed and returned.
3. Critical – A critical issue has been identified and/or occurred. It requires immediate attention within 48 hrs. Campbell's Supplier Corrective Action Form (SCAR) must be completed and returned.

### 16.5 – Complaints – Campbell's finished products:

Classifications:

1. Critical – Complaints on finished products shall be given the highest priority of investigation due to the direct risk of Food Safety and/or Quality to Campbell's customer and/or consumer.



## 17.0 – CALIBRATION PROGRAM

### Definitions:

Calibration	The process of comparing the measurement results from a piece of equipment against a known national or international standard/reference method.
-------------	---

### 17.1 - Assessments and Expectations:

Supply Base Partner (SBP) shall perform a risk assessment to identify and monitor the critical points of the calibration in the process and equipment. Where appropriate calibration controls shall be established as part of the Food Safety Plan (FSP), Quality plan, or a part of the pre-requisite program. This assessment shall be kept current and consider changes to the facility, equipment and process as they occur. Minimally, an annual review of the program shall occur.

### 17.2 - Personnel:

1. Shall be trained on how to properly calibrate equipment for equipment that they are responsible for and operate.
2. Shall ensure that activities, processes, or services which need to be performed under calibrated conditions are done so correctly.
3. Shall identify and take corrective actions as necessary on out of calibration issues.

### 17.3 - Program Documentation:

Supply Base Partners shall ensure that a documented calibration program exist for all critical Food Safety, Quality, and Regulated equipment, processes, and products. The program shall meet any applicable Regulatory, Industry, and Campbell requirements.

Procedures, work instructions, and records shall exist and include at a minimum:

1. Standards or reference used for calibration. Explain regulatory requirements if applicable.
  - a. Acceptance limits/specifications
2. List of critical equipment for Food Safety, Quality, and Regulatory compliance.
  - a. Identification
    - i. Name and ID number.
    - ii. Description
    - iii. Serial number
    - iv. Manufacturer
    - v. Location
  - b. Calibration
    - i. Date of last calibration
    - ii. Frequency for calibration
    - iii. Next calibration date
    - iv. Who completed the calibration
3. Calibration procedures shall be developed and maintained for equipment requiring calibration.
4. Calibration frequencies shall exist that are based on and occur:
  - a. Original equipment manufacturers (OEM) recommended calibration interval.
  - b. Prior to and after a critical project (i.e. new line, equipment, or product commissioning).
  - c. After an event (i.e. if equipment may have been damaged).
  - d. Critical nature of the measurement (i.e. CCP [Critical Control Points]).
  - e. History and/or reliability of calibration.
  - f. Incidents and/or complaints.
5. Describes who is authorized to perform calibration and documents when it was completed.
  - a. If internal, the job descriptions of who is permitted to perform the calibrations.



- b. If external, the Calibration company and service representative.
    - i. Calibration certifications maintained.
  - c. Date calibration performed.
    - i. Shall be on equipment list and a calibration label/sticker directly on equipment where possible.
  - d. Formal sign off by person calibrating the equipment.
    - i. Shall be on the equipment list, calibration label/sticker, and certifications.
6. Procedures for out of calibration equipment
- a. Describes what happens to equipment when an out of calibration condition occurs.
  - b. Describes re-calibration process for equipment.
  - c. Holds material/services that were impacted and describes the disposition of affected material/services.
7. Procedures for out of service equipment.
- a. Equipment not on the calibration list shall be automatically deemed not calibrated.
    - i. Plant shutdown, equipment in storage, etc.
    - ii. The calibration due date may be postponed until the equipment is ready to be brought back into service.
    - iii. Status shall be documented on the equipment log.
  - b. Calibration shall be completed prior to equipment being recommissioned or start up.
8. External facilities/laboratories shall have independent 3<sup>rd</sup> party accreditation to recognized standard.



## 18.0 – DOCUMENT CONTROL PROGRAM

### 18.1 - Program Assessment and Expectation:

Supply Base Partners (SBPs) shall establish and maintain a documented program on the control, security, review, and approval of all documents, data, records, and samples critical to the Food Safety, Quality, and Regulatory compliance of the business.

This includes, but is not limited to:

1. Food Safety and Quality management
2. Regulatory management
3. Formulas management
4. Specification management
5. Label approvals
6. Business policies, Procedures, and work instructions
7. Laboratory manuals
8. Inspection and testing activities and results

### 18.2 - Personnel:

1. Shall be trained in and understand document management and control practices.
2. Shall ensure the most current version of a documents are used.
3. Shall ensure removal from available use and dispose of obsolete versions.
4. Shall ensure proper documentation and records are performed and kept.
5. Abide record retention policies.

### 18.3 – Program Documentation:

1. Document cycle management
  - a. Current documents shall be readily available at point of use to the individuals that need them
  - b. Invalid and/or obsolete documents shall be promptly removed from circulation to prevent unintended use.
  - c. Any obsolete documents retained for legal and/or knowledge-preservation purposes are suitably identified.
2. Data collection
  - a. Cover all critical functions and activities related to Food Safety, Quality, and Regulation for the operation or service.
  - b. Automated where possible or collected by trained personnel knowledgeable in the activity.
  - c. Recorded real time for the task or activity.
  - d. No missing or blank data where data would normally be expected. Explanation of why a data recording deviation has occurred. Corrective action for deviation documented.
  - e. All rechecks shall be recorded.
3. Records
  - a. Must either be written in indelible ink/marker or entered electronically in a secure system.
  - b. Must be signed or initialed and dated by the person completing the task/activity.
  - c. Ink pens used in the facility shall only be company approved one piece and no cap; wholly metallic ink pens are recommended. Pencils and erasers are prohibited.
  - d. SBP shall have a process in place for effectively controlling or eliminating the following loose items: rubber bands, paper clips, thumbtacks, pushpins, and staples.
  - e. Written records shall be legible.
  - f. Alterations to written records shall be made by:
    - i. Using a single line to cross out the incorrect entry.



- ii. Writing the correct entry.
    - iii. Dating and initialing the change by the person making the change.
    - iv. Use of correction fluid or correction tape is not permitted.
  - g. Record retention
    - i. 3 years minimum or product shelf life +1 year, whichever is greater.
    - ii. Must meet any specific regulatory requirements for document retention.
  - h. Record storage
    - i. In a secure area or system. Accessible only to authorized personnel.
    - ii. Easily retrievable
      - 1. This shall be tested and documented during mock recalls and audits.
- 4. Retain Samples
  - a. SBP shall have a policy on the management of retain samples. Justification shall exist explaining why retains are not kept.
  - b. Samples retained shall be representative of the material should they be needed for any purpose at a later time.
  - c. Follow shelf life of the material.
- 5. Data Systems
  - a. Electronic systems used for Food Safety and Quality records must be validated.
    - i. Calibration shall occur for systems taking measurements.
  - b. In compliance with any pertinent and application regulation.
  - c. System access shall be restricted to trained authorized personnel.
- 6. Campbell Owned Information
  - a. Where there is a formula, specification, procedure, data, audits, material, etc, is identified as owned by Campbell the SBP shall additionally:
    - i. Ensure access to these documents are secured and restricted to authorized personnel only. Applies to any storage format, including temporary like portal hard drives, data sticks, etc.
    - ii. Authorized personnel shall have a confidentiality agreements in place with Campbell. Time constraints of this agreement shall exist.
    - iii. Not disseminate to any source without Campbell written agreement.
    - iv. Follow the directions of the Campbell Quality/Food Safety Representative managing the SBP relationship.



## 19.0 – MATERIAL/SERVICE EVALUATION, HOLD, and RELEASE PROGRAM

### Definitions:

Hold	Materials that have not been approved for release to Campbell or commerce because they are pending or currently in review or inspection against specifications and other Food safety, Quality, and Regulatory requirements.
Non-conforming / Rejected	Materials that have been found to be unacceptable due to review or inspection, non-conforming to specification or other Food Safety, Quality, or Regulatory requirements.
Expired	Materials that have exceeded their shelf life or age requirement.
Released	Materials that following review or inspection have complied with specification and other Food Safety, Quality, and Regulatory requirements that define them as acceptable to be released to Campbell and/or commerce.

### 19.1 - Program Assessments and Expectations:

Supply Base Partners (SBPs) shall have an effective documented program and controls in place to manage the various approval stages and statuses of material or services. The objective being to prevent shipment of non-conforming materials or services to Campbell or into commerce.

### 19.2 - Personnel:

1. Shall be trained in this process. Capable of performing evaluations, inspections, reviews, holds, and releases to manage and control material and service compliance.
2. Identify Food Safety, Quality, and Regulatory issues that require the need to hold product for their roles and responsibilities levels at the SBP.
3. Prevent non-conforming product from being delivered to Campbell's or into commerce.

### 19.3 - Program Documentation:

The program shall include but is not limited to:

1. Who is authorized to perform evaluations, inspections, holds, reviews, and releases of materials or services by role and title.
2. Procedures, work instructions, and records for the execution of the program. They shall explain how personnel perform and manage proper evaluations, inspections, holds, reviews, and releases of material or services against specifications and other Food Safety, Quality, or Regulatory requirements:
  - a. Shall cover end to end management of the supply chain from raw material source to customer.
  - b. Any materials or services suspected of being non-conforming shall be placed on hold immediately
    - i. A Hold log should exist with each and all incidents documented. It should include product name, lot number, quantity held, issue, root cause, corrective action, who has performed the evaluation and disposition of the material.
    - ii. Material shall be properly identified as on "HOLD"
      1. Physical tagging of units and pallets when possible.
      2. Inventory system (Inventory software programs, ERPs, warehouse) shall also be managed to identify the material as on hold and prevent shipment from taking place.
    - iii. Large capacity storage (tanks, bins, silos, tankers, etc) shall have a mechanism to prevent or lock out accidental usage.
    - iv. Proper segregation of the held material in storage place away from normal material, such as a hold area, should exist.





- v. Audits and physical cycle counts to confirm the held material is still on hold shall be regularly performed. These audits shall be documented and increase if 100% held material is not confirmed. Root Cause Analysis (RCA) and corrective action shall take place.
  - c. Shall include how decisions or dispositions of held, expired, non-conforming/rejected are made and documented.
    - i. Records shall be kept of decisions and dispositions.
      - 1. Campbell branded product shall only be dispositioned by the proper Campbell Quality or representative authorized in writing by Campbell.
    - ii. Root Cause analysis shall be performed for each incident and documented.
    - iii. Corrective action shall be taken for each incident and documented.
  - d. Shall include documentation on how communication of information occurs.
    - i. Internal company and staff
    - ii. External supply chain partners
    - iii. Customers
    - iv. Regulatory agencies as necessary
3. Held, Expired, or Non-conforming / Rejected materials or services shall not be delivered to Campbell.
- a. Procedures shall also be in place for the identification and retrieval of material that has been accidentally released to Campbell or commerce while on hold or identified as non-conforming material.
    - i. On rare exception material held while “in testing” may be shipped under conditions of a Material Shipping Waiver as outlined in Section 15.
4. Disposal of material
- a. Product designated for destruction shall be handled in a way to assure proper defacement and disposal so that it cannot possibly enter the stream of commerce or consumption.
  - b. Procedures for destruction shall include confirmation requirements, especially for food safety issues.
  - c. Records shall be kept and include the product affected, date of production, number of units, date of destruction, and signature of the responsible person and witness.
  - d. Campbell Branded products additionally require photographs of destruction provided to Campbell as confirmation. A certificate of destruction shall be provided noted that the material was destroyed in a manner that prevents human or animal consumption and done so in accordance with all Federal, State, and Local regulations.



## 20.0 – AUDITS AND INSPECTIONS PROGRAM

### 20.1 – Program Assessments and Expectations:

The SBP shall have an Audit and Inspection program in place that evaluates the health and compliance of their business to Food Safety, Quality, and Regulatory requirements. They shall manage the system to be compliant with internal, Industry, and Campbell standards. An audit and inspection program is an essential part of driving continuous improvement in a business.

### 20.2 - Personnel:

1. Key personnel shall be designated as auditors for the organization.
2. A formal system of auditor training and calibration shall exist for the personnel.
3. They shall have demonstratable knowledge of auditing and be qualified to perform Food Safety and Quality Audits.
4. Capable of performing audits on both their own systems (Internal audits) and that of their supplier's systems (Supplier audits).

### 20.3 - Program Documentation:

The program shall include but is not limited to:

1. Who is authorized to perform training of auditors.
2. Who performs audits by role and title.
3. Procedures, work instructions, and records which explains how personnel perform and manage the audit program for compliance to material or services specifications and other Food Safety, Quality, or Regulatory requirements. Shall include but not be limited to:
  - a. Auditor Training Program
    - i. Documented training materials
    - ii. Certifications – Internal and External
    - iii. Assessment and re-assessment of auditor competence
    - iv. Approved auditor list
  - b. Internal Audit Schedule
    - i. Documented schedule of when key processes, systems, and functions that impact Food safety, Quality, and regulation are audited.
      1. Examples include:
        - a. Start Ups
        - b. Sanitation
        - c. Quality System
        - d. HACCP/Food Safety plan
        - e. Product
        - f. GMPs
        - g. Training
      - ii. Justification for audit frequency or decision not to audit defined and documented.
    - c. Supplier Audit or assessment schedule
      - i. Documented schedule of when key suppliers will be audited or assessed.
      - ii. Prioritized based on Food Safety and Quality Risk.
      - iii. Justification for audit frequency or decision not to audit defined.
    - d. Audit Standards shall be defined.
    - e. Audit Reports shall be generated.
      - i. Document standards used, what was audited, who audited it, observations of the audit, findings, and approval status.
    - f. Documented root cause analysis shall be performed.
    - g. Documented corrective actions and preventative actions defined and completed.



- h. Audit metrics shall be established and tracked. They should include finding numbers, criticality, corrective action closures rates, and effectiveness among other metrics.
- i. Documented management reviews shall take place on the effectiveness of the audit program.

#### **20.4 - Third Party Certification:**

1. Campbell only recognizes the Global Food Safety Initiative (GFSI) scheme standards with Quality components as the approved 3<sup>rd</sup> party audit for all Campbell SBPs.
  - i. Link: <https://www.mygfsi.com/>
2. All Supply Base Partners (SBP) are required to have on-going 3<sup>rd</sup> party audits performed on their Food Safety and Quality Systems. Each SBP shall obtain and maintain approved certification status.
  - a. Lapse, lack, or unsatisfactory status rating of certification is an automatic disqualification as a Campbell SBP.
  - b. Changes in status shall be communicated to Campbell in writing.
  - c. Certifications shall be shared with Campbell.
  - d. Full audit reports, corrective actions, and plans shall be shared with Campbell.
3. A 3<sup>rd</sup> party accredited GFSI recognized scheme standard does not automatically guarantee approval to supply Campbell. GFSI approval is just one important part of the overall SBP approval process.

#### **20.5 - Campbell Audit:**

1. Sourcing: A Campbell audit is a condition of doing business with our company.
  - a. New SBPs or SBP locations will receive an audit prior to first order to Campbell.
  - b. SBPs will ensure that they ship only approved materials from locations approved by Campbell Quality.
  - c. SBPs shall never change operation or locations without prior notice and approval by Campbell.
2. Audit Access: SBP shall ensure that Campbell has access to SBP operations that manufacture, supply, store, or transport material or services to Campbell.
  - a. This may be for Quality, Food Safety, Security, or Responsible sourcing Audit or assessments.
  - b. It is Campbell's policy to give reasonable notice of intent to conduct an audit/inspection at reasonable times for any establishment/facility manufacturing, storing, transporting, or otherwise supplying materials (ingredients, packaging, or Campbell branded products) or services to Campbell. These requirements include those facilities supplying to and through brokers as well as transport vehicles.
3. Audit Scope: The scope of the audit may vary and include but not be limited to: Campbells standards, this SBREM, specifications, non-conformance issues, Food Safety and Quality records, processes, etc.
4. Campbell Audit frequency: Will be based on an internal risk assessment of that specific SBP, material, and location. An audit frequency will follow that is represented in terms:
  - a. High: After initial audit. Annual audit + GFSI certificate provided annually
  - b. Medium: After initial audit. Audit every 3 to 5 years + GFSI certificate provided annually
  - c. Low: After initial audit. A GFSI certificate provided annually.
5. Critical Issue Access: Nothing in any contract or this manual shall deny the right of Campbell to immediate access for audits or inspections by its own representatives, or through firms/agencies that conduct audits/ inspections under contract, if an emergency Quality, Food Safety, or recall issue deems it necessary.



## **21.0 – CONTINUOUS IMPROVEMENT**

### **21.1 – Assessments and Expectations:**

Every Supply Base Partner (SBP) shall assess the needs of the business to ensure that a culture of continuous improvement exist and is actively driving positive value for the SBP and Campbell. A continuous improvement program with initiatives to continually enhance performance, reliability, efficiency, and effectiveness of Food Safety and Quality management systems shall exist.

### **21.2 - Personnel:**

1. Shall be trained to understand of the methods of continuous improvement related to their function, role, and impact on the business.
2. Shall actively demonstrate results of improvements to the business.
3. Shall perform reviews of key continuous improvement initiatives, methods, and metrics.

### **21.3 – Program documentation:**

1. Shall have a documented program that explains the processes by which the SBP executes continuous improvement. The process shall explain what the continuous improvement cycle and tools are that the SBP uses.
  - a. Facilities are strongly encouraged to integrate and utilize continuous improvement tools/methods such as Six Sigma, Lean, and/or Kaizen.
2. Shall define individual roles and responsibilities for continuous improvement.
  - a. Ownership of key metrics
  - b. Ownership of key projects
  - c. Ownership of key reports
  - d. Ownership of key reviews / meetings
3. Shall keep records of key metrics, projects, reports, and meetings related to continuous improvement.
4. Senior leadership, at both the facility and corporate levels, shall review the progress of the organization against key continuous improvement objectives and ensure all activities are documented and monitored for effectiveness.
  - a. Key metric goals shall be established, documented, reviewed, and achieved.

### **21.4 – Metrics:**

1. The SBP shall define, track, and trend meaningful Food Safety and Quality key performance indicators (KPIs). A Key Performance Indicator (KPI) is a type of performance measurement or metric used to evaluate the progress, success, or achievement of goals and/or objectives.
2. KPI information and data shall be reviewed to determine food safety and quality improvements opportunities. This review shall be part of the management review process.
3. At a minimum, and as applicable, the following KPI's shall be included:
  - a. Line and product specification
    - i. Capabilities and compliance to targets
  - b. Non-Conformances
  - c. Internal and External Audit Results
  - d. Recalls/Retrievals



### **21.5 – Supplier Relationship management (SRM):**

1. Campbell will monitor and measure the performance of our Supply Base Partners (SBPs) through a process of Supplier Relationship Management (SRM) using various sources of information including but not limited to:
  - a. The Suppliers owns KPI's
  - b. Campbell collected data (pre-shipment samples, incoming inspection, COAs, etc.)
  - c. Campbell Supplier Scorecard
2. Business reviews will take place at a frequency determined by the Campbell representative and as appropriate to the size and risk of the relationship.
3. Campbell's may require the SBP to provide a detailed improvement plan should the SBP performance warrant it based on metrics, scorecards, issues, risk, or general poor performance.

### **21.6 - Supplier Quality Scorecard:**

1. All or a portion of the following metrics may be tracked for each SBP and used as a component of Campbell's risk assessment:
  - a. Number of Quality Notifications (QNs) and effectiveness of corrective actions plans
  - b. Severity Level of the QNs
  - c. % Defective/DPM (Defects per Million)
  - d. Overall Supplier Audit Rating
  - e. % Audit Corrective Action Open
  - f. % Purchase Order Accuracy
2. The overall scale is 0 – 100%.
3. Every SBP's goal is to achieve 100% and maintain a low risk status on the supplier scorecard.



## 22.0 – REGULATORY

### 22.1 – Program Assessments and Expectations:

The movement of materials and services from the Supply Base Partners (SBPs) through the supply chain to Campbell shall be understood so that the Regulatory compliance needs are transparent to each business and ultimately met. The SBP shall ensure their operations, materials (ingredients, packaging, Campbell branded products, etc.) or services supplied to Campbell are in compliance with the laws and regulations of the jurisdiction in which the SBP is located as well as the jurisdiction to which the materials are shipped or services provided. Regulatory compliance shall be achieved by the SBP to ensure no violations occur or disruptions to Campbell Supply chain take place.

### 22.2 – Personnel:

1. Shall be trained in and understand the relevant Regulatory obligations related to their responsibilities, operations, raw material, packaging, and other components related to the materials or services provided.
2. Shall execute their duties in accordance with appropriate regulations to ensure compliance at all times.

### 22.3 – Program Documentation:

Supply Base Partners (SBPs) shall have a documented program explaining how to manage Regulatory changes, contacts, holds, samples, and violations. The program shall include but not be limited to:

1. Changes and Updates to Regulations:
  - a. Have a procedure that explains how the changes and updates are managed at the SBP
    - i. At minimum there should be a point person who is accountable for ensuring that regulations are monitored, reviewed, communicated and appropriately integrated into the SBP organization to ensure compliance is maintained.
    - ii. The SBP shall demonstrate they are current with all relevant regulations.
2. Regulatory Contact
  - a. Have a procedure that explains how the contact is handled and what information can and will be shared.
    - i. Assign responsibilities, a point person, and a team if necessary
    - ii. Document the contact and reason.
3. Regulatory Hold:
  - a. Have a procedure in place for managing a regulatory hold of material anywhere in the supply chain. It could be a hold at the boarder of a country, facility, etc.
    - i. It shall include documenting the purpose of the hold.
    - ii. Estimated time of the hold.
    - iii. Manage communication of hold and release of the material to its intended next destination.
4. Regulatory Samples:
  - a. Have a procedure in place that describes how to handle regulatory sampling, at a minimum it shall include:
    - i. Documenting the date, time, purpose, agency, and inspectors.
    - ii. Documenting the material, lot numbers, and quantity sampled.
    - iii. Documenting the testing to be performed by the regulatory agency.
    - iv. Taking duplicate or split samples. Ensure that the sample is preserved and secured from tampering. Store under proper temperatures and according to the material's specification.
    - v. Determining what, if any testing, will be performed by the SBP.
    - vi. Ensuring that all material in inventory is put on hold and quarantined by the SBP.
    - vii. Performing a trace on where other materials of that lot may have been shipped or sold. Notify external facilities and/or customers of the regulatory sampling.



- viii. Providing proper notification to Campbell and other customers of the impact or potential impact around what has been supplied of the material and any disruptions to the continued supply of the material.
    - b. Have a method for external follow up that includes notifying Campbell immediately if Campbell is impacted. Closing the loop is necessary for all Campbell initiated investigation request.
- 5. Regulatory Issue/Violations
  - a. Have a procedure that explains how regulatory issues are handled and includes, at a minimum the following:
    - i. Assign responsibilities, a point person, and a team if necessary.
    - ii. Assess and confirm validity of the issue.
    - iii. Conduct a risk assessment on the issue. Define scope and impact.
    - iv. Perform investigation, identify a root cause, and establish corrective action.
    - v. Determine disposition of material or service.
    - vi. Document the issue and investigation.
- 6. Campbell Branded materials
  - a. Anytime a Campbell branded material that is produced, stored, transported, or otherwise managed by a SBP has a regulatory issue Campbell shall be immediately notified and debriefed on the issue following the requirements outlined in this section of the SBREM.
  - b. Campbell will take primary ownership of the management of the regulatory issue impacting Campbell branded product. The SBP will provide all necessary support. All branded material dispositions will be given and approved exclusively by Campbell.



## 23.0 – FOOD SECURITY

### Definitions:

Food Security	Comprised of Food Defense and Food Fraud programs intended to protect employees, customers, and consumers by reducing the risk of intentional adulteration and/or contamination from product tampering thereby safeguarding product quality and food safety.
Food Defense	The protection of food products from intentional contamination or adulteration by biological, chemical, physical, or radiological agents to cause harm. Food Defense includes personnel, operational, and infrastructure elements.
Food Fraud	The act of purposely altering, misrepresenting, mislabeling, substituting or tampering with any food product at any point along the supply-chain, typically for purposes of financial gain. Food Fraud may occur in raw materials/ingredients (including packaging materials), or in finished product, and may result in either a Food Safety or Food Quality issue. Food Fraud may be the result of product substitution, mislabeling, dilution, counterfeiting, or stolen goods. Prevention of Food Fraud requires awareness, surveillance, and vulnerability determination at the ingredient and/or supplier level

### 23.1 – Program Assessments and Expectations:

The Supply Base Partner shall have a documented Food Security program. The SBP shall perform an assessment of Food Security (Food Defense and Food Fraud) issues and risk in their Supply Chain. The SBP shall take appropriate steps to resolve those risk to ensure a continued safe supply of materials and services to Campbell. This assessment shall be performed annually or more frequently based on changes in the Supply Chain that warrant a review.

### 23.2 – Personnel:

1. Shall have documented training in and understand the aspects of Food Security.
2. A multi-disciplinary team shall exist and perform a comprehensive Food Security assessment at minimum annually.
3. Personnel shall ensure that materials and services are protected by Food Security plans and procedures. They shall quickly and accurately identify, respond to, and contain threats or acts of intentional adulteration/contamination. Employees shall immediately report any signs of possible product tampering, sabotage, unusual behavior, or plant security breaches to a supervisor.

### 23.3 – Program Documentation:

The Supply Base Partner (SBPs) shall have a documented Food Security program in place that includes but is not limited to:

1. Facility Food Defense plan
  - a. Documented assessment of the development, implementation, and maintenance of a site-specific food defense and security plan.
    - i. Include gaps identified and steps to take corrective action on risk.
  - b. The plan shall be re-evaluated (and revised as necessary) annually. If an internal or external incident occurs that may add or reveal a new risk changes should also be implemented on an as needed basis.
  - c. Shall define how to quickly and accurately identify, respond to, and contain threats or acts of intentional adulteration/contamination.
2. Food Fraud plan
  - a. There shall be a documented assessment and mitigation plan of the SBP's risk related to Food Fraud.





- b. This assessment shall be a component of assigning risk to the SBPs supply base, (Campbell's 2<sup>nd</sup> tier supply base and beyond) to ensure a continued supply of tamper free materials and services to Campbell's.
  - c. SBP shall have a Supply Base Management Program in place (as referenced in section 9.0 of this standard) to help control Food Fraud vulnerabilities.
  - d. The plan shall be re-evaluated (and revised as necessary) annually. If an internal or external incident occurs that may add or reveal a new risk changes should also be implement on an as needed basis.
3. Awareness and Responsiveness
- a. Employees shall immediately report any signs of possible product tampering, sabotage, unusual behavior, or plant security breaches to a supervisor.
  - b. All threats (suspected or real) and incidents of intentional product tampering or sabotage shall be immediately investigated. A swift response to any threat shall be taken to ensure that no adulterated or contamination occurs to material or services. Any issue shall be documented and the action taken to mitigate the risk explained.
  - c. Qualified personnel shall conduct periodic documented Food Defense and Plant Security inspections/assessments of the plant. The assessments/inspections shall be evaluated, and as necessary, corrective and/or mitigation actions shall be implemented.
  - d. All facilities, both domestic and international, must maintain FDA Bio-Terrorism Registration.
4. Campbell Branded Products
- a. Anytime a Campbell branded material managed by a SBP has a Food Security issue the SBP shall be immediately notified and debrief Campbell on the issue following the requirements outline in this section of the SBREM.

**23.4 – Program Operational Activities:**

The program shall include but not be limited to:

<b>Component</b>	<b>Requirement</b>
<b>Employees / Visitors / Contractors Access</b>	Each facility shall have a process in place for controlling access into the facility by visitors and contractors. This access shall be recorded. Facilities may use electronic access control for visitors and/or contractors. A full electronic access control system with control cards, key fobs, and/or scan sensors shall be implemented and employed to control access for all employees into the facility and, as necessary, restrict access within the facility. Examples of areas which may have restricted access include, but are not limited to, administrative offices, laboratories, IT rooms, utility rooms, sensitive processing areas, and storage areas.
<b>Security Guards</b>	If security guards are employed, they shall be trained and shall monitor for signs of suspicious activity and unauthorized entry.
<b>Hiring and Termination</b>	The pre-hiring screening and termination activities of employees (permanent, part-time, seasonal, temporary, and contract) shall be conducted and managed by Human Resources (HR).
<b>Computer Systems and Data</b>	Internal and external access to computers, software, and systems shall be strictly controlled by Information Technology (IT) or assigned delegates including maintaining the adequacy of anti-virus protection. Refer to section 18.0 for more detail on System and data management.
<b>Mail/Postal Materials Handling</b>	It is strongly recommended that mail/postal be handled away from ingredients and packaging materials. Any suspicious mail/postal materials shall be reported to Plant/Facility Management for appropriate actions
<b>Storage, Control, and Use of Chemicals (i.e. sanitizing agents, pesticides)</b>	Locked storage areas. Controlled access, labelled, and stored away from potential risk areas for contamination of materials, equipment, or services.

<b>Inbound and Outbound Deliveries</b>	<p>Truck deliveries shall be verified against a list of scheduled deliveries. Unscheduled deliveries shall be held pending verification of shipper and cargo.</p> <p>Inbound vehicles, when applicable, shall be inspected for tamper-evident security seals or padlocks. Incoming vehicle seals should be examined for integrity and compared to the incoming bill of lading (BOL).</p> <p>Returned products shall be examined for evidence of possible tampering.</p> <p>Outbound vehicles, where applicable based on risk, shall be sealed with a tamper-evident security seals or padlocks. It is strongly recommended that trucks making multiple stops or Less Than Full Load (LTL) trucks are secured with padlocks or seals. Refer to Section 15.0 for more detail on shipping requirements.</p>
<b>Internal and External Restricted Areas/Systems</b>	<p>Both internal and external areas of the facility with restricted access should be clearly identified. These may include areas/systems such as Clean-in-Place (CIP) systems, HVAC units, potable water systems, utilities (gas, electricity), sensitive processing areas, and computer servers.</p>
<b>Emergency Evacuations, Exits, and Alerts</b>	<p>Emergency evacuation routes shall be established, documented, and implemented. Tests of the evacuation routes shall be conducted, at least once per year, to ensure effectiveness of the system. Emergency exits should be alarmed and/or have self-locking doors that cannot be opened from the outside. Emergency alert systems shall be fully operational and tested at least every 6 months. An emergency contact list shall be maintained and be up to date. System shall be able to quickly notify employees on the premise of an emergency requiring evacuation. Procedure should exist to secure facility and materials during an evacuation event from potential tampering.</p>
<b>Internal and External Openings</b>	<p>Plant doors, roof openings, vent openings, outside trailers (excluding empty trailers), railcars, bulk storage tanks, potable water tanks, hose/pump stations, and wells shall be secured (e.g. locks, seals, sensors) when not in use.</p>
<b>Plant Layout Schematics</b>	<p>Updated plant layout schematics shall be maintained in a secure location. Schematics shall identify all entrances into the plant and accesses to the roof.</p>
<b>Fencing, Gates, and Access-Controlled Automated Turnstiles</b>	<p>Where possible and when applicable, perimeter fencing and gates should be established around the entire plant grounds or, at minimum, around the plant itself, unless prohibited by local laws and/or plant configuration. Access-controlled automated turnstiles should also be considered to assist in the control of employee traffic and pedestrian traffic.</p>
<b>Closed Circuit TV (CCTV)</b>	<p>CCTV should be used as complement to an integrated plant security program to aid in the effectiveness and efficiency of the plant's overall security program.</p>
<b>External Lighting</b>	<p>Adequate external lighting (around the building, near unloading and loading areas, and in the parking lot) shall be installed and maintained to allow detection of unusual activities and to deter unauthorized behaviors.</p>
<b>Alarm System</b>	<p>An alarm system shall be installed and monitored to alert designated employee(s) or local law enforcement, if guard or employee coverage is unavailable during plant closures.</p>



## 24.0 – RESEARCH AND DEVELOPMENT

### 24.1 – Program Assessments and Expectations:

Supply Base Partners (SBPs) shall have documented programs in place for managing Research and Development. This shall include any change in form, fit, or function to a material that may have impact on the Food Safety, Quality, or Regulatory compliance of that material. The program shall manage changes in formulas, specifications, materials, processes, systems, equipment, management, and/or production facilities related to the SBPs business.

### 24.2 – Personnel:

1. Shall be trained in and understand product Research and Development.
2. Shall understand Food Safety, Quality, and Regulatory implications of product design.
  - a. New products
  - b. Product changes

### 24.3 – Program Documentation:

Program shall include documentation on but not be limited to:

1. Innovation and New Material Design
  - a. Documented assessment of Food Safety risk in the product design and associated processes.
  - b. Documented Impact of changes to the Quality of the material.
2. Existing Product Design Changes
  - a. Documented assessment of Food Safety risk in the product design and associated processes.
  - b. Documented Impact of changes to the Quality of the material.
3. Program documentation and records shall exist and include be not be limited to:
  - a. Material level
    - i. Formulas
    - ii. Specifications
    - iii. Labels
    - iv. Material statements
    - v. Nutrition
    - vi. Standards of identity
    - vii. Claims
    - viii. Allergens
  - b. Process level
    - i. Procedures
      1. Processes by which R&D is conducted.
      2. Approval processes for innovation and product changes.
      3. Customer communication.
    - ii. Parameters
    - iii. Capabilities
    - iv. Information Systems
  - c. Systems level
    - i. Information systems
    - ii. Approval systems
    - iii. Materials
4. Campbell Branded Material
  - a. All Campbell branded materials shall only be approved and/or changed based on the authority of Campbell exclusively.
  - b. A process shall exist between the SBP and Campbell to communicate R&D work and approvals.



## **25.0 – EMPLOYEE TRAINING**

### **25.1 – Program Assessments and Expectations:**

Supply Base Partners (SBPs) shall assess the need of their organization to establish roles and responsibilities for all personnel. The training program shall be documented, planned, functional, and effective for all personnel and include competency evaluations. Training shall be performed against job descriptions, Food Safety, Quality, and Regulatory management needs. Training needs of an SBP shall remain current with industry standards and demands for the critical areas mentioned.

### **25.2 – Personnel:**

1. Training shall be conducted by qualified and/or certified individuals.
2. Individuals shall be trained to their job description.
3. Individuals shall be able to demonstrate competency to their job description.
4. Shall be able to perform duties as required by their role, responsibilities, and level to ensure Food Safety, Quality, and Regulatory compliance.

### **25.3 – Program Documentation:**

The program documentation shall include but not be limited to:

1. Job descriptions: Shall exist and defined roles and responsibilities. Job descriptions shall define the key Food Safety, Quality, and Regulatory duties for all personnel that impact these critical areas.
  - a. Employees shall be able to demonstrate to the job description competence through verbal, written, and performance activities.
2. Training topics: Appropriate Food Safety, Quality, and Regulatory topics shall be selected and training provided to personnel based on their role, responsibilities, and level.
  - a. Examples include: General content of a Food Safety and Quality system. HACCP/Food Safety Plan, chemical control, allergen control, food hygiene, sanitation, calibration, laboratory practices and testing, internal auditing, regulatory requirements, maintenance, food security, and GMP practices.
3. Planning: A training plan shall exist for the organization, function, and individuals.
4. Development training: A SBP's training plan shall include development training to expand individual employee's knowledge of a topic in an effort to develop that individual for the future.
5. Refresher Training: Shall be conducted at frequencies required to maintain competency. In addition, the frequency of training may be influenced by performance deficiencies like audit findings and/or product non-conformances, out of specification results, consumer/customer complaints and risk assessments around severity for noncompliance. Refresher training may be accomplished by retraining to a specific topic, coaching, mentoring and/or on-the-job training.
6. Records: Training programs shall be documented, maintained, and records kept. Records shall include a list of participants, completion date, training contents, and effectiveness evaluations to prove employee competency.