

SUPPLY BASE REQUIREMENTS — AND — EXPECTATIONS MANUAL



January 1, 2010

Dear Campbell Soup Company Supply Base Provider:

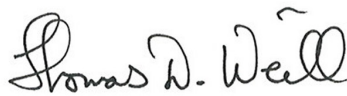
At Campbell, our mission is to build the world's most extraordinary food company by nourishing people's lives everywhere, everyday. Our mission and our brands illustrate our commitment to our consumers and to our stakeholders. Over the years we have worked hard to keep that commitment which is reflected in the strength of our brands - our most valuable assets.

You play a vital role in maintaining and enhancing these valuable assets. The information in this manual will assist you in this effort and will ensure that all of our current and future suppliers of ingredients and packaging materials, contract manufacturers, warehousemen, service providers, and any other third party vendors share an understanding of our threshold performance expectations.

We believe the programs described in this manual are essential for the effective management of food safety and quality. Our expectation is that your expertise will enable you to decide how best to ensure these requirements are met.

From time to time, auditors, who are either commissioned by yourselves or employed by us, will visit your operations to assess the effectiveness of the controls you have in place. This practice will ensure both partners that your systems and processes are effective and functional.

To be successful we must work together throughout the supply chain to provide our customers and consumers with safe and superior value products.



Chief Procurement Officer



Senior V.P. Global R&D/Quality

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1.0 – INTRODUCTION

A primary objective of Campbell is to market safe products of consistent quality that meet or exceed our customer and consumer expectations. To accomplish this, it is important that our brokers, co-packers, re-packers, special packers, suppliers, warehouses, distributors, and licensees share the same objectives.

Another core Campbell business strategy is to advance a powerful commitment to Corporate Social Responsibility and Sustainability. We recognize that Campbell suppliers and other business partners play a critical role in helping Campbell Soup Company execute our mission in an ethical and responsible manner.

The requirements detailed on the following pages are designed to help our current and potential brokers, co-packers, re-packers, special packers, suppliers, warehouses, distributors, and licensees meet these objectives. These requirements have been developed through reviews of quality audits of manufacturing sites, other major food company programs, and a study of product retrievals throughout the food industry. Our examination has led us to identify which programs, when executed well, can help prevent product retrievals, consumer complaints, rework and plant downtime. Campbell considers adherence and performance to these expectations as essential factors when entering or extending existing business relationships.

It is your responsibility, as a Campbell broker, co-packer, re-packer, special packer, supplier, warehouse, distributor, and licensee to meet or exceed these threshold requirements, to ensure that the products produced for Campbell's and its subsidiaries are safe and meet or exceed our quality standards. If you have any questions about these standards, contact your Campbell Contract Representative. All references to Campbell, its products and representatives for the purpose of this manual, shall include all Campbell's divisions and subsidiaries, includ-

ing, without limitation, Pepperidge Farm and Arnott's Biscuits.

We stress that these are minimum requirements. They are not intended to alter or eliminate any requirements that may be set forth in any contracts or product specifications issued by any Campbell division or subsidiary. By receipt of these materials, you acknowledge that these requirements become part of our purchasing contracts, including purchase orders.

As you review this manual, you will note it does not detail how to set up product safety and quality systems within your company. It only identifies the basic programs that are necessary to produce safe products of consistent quality. Your expertise in your field will enable you to define the approach best suited to ensure compliance with these requirements.

Some requirements cover issues that routinely change. Regulatory authorities continually review and adjust the legal status or limits for ingredients; the scientific community may present new product safety information; or Campbell may desire changes in quality programs to better ensure the safety and quality of our products. You are expected to comply with current regulatory requirements and any changes. Campbell will, in turn, advise you when new technologies or new learnings prompt a change in our requirements.

Not all of these requirements may apply to every ingredient, commodity or packaging material we purchase from you or other providers. We do provide for exceptions which can be based on the uniqueness of a material, product or process. If you feel an exception is needed for your plant(s), contact your Campbell Contract Representative who will inform you what steps are necessary to apply for an exception to any of Campbell requirements.

2.0 – GENERAL REQUIREMENTS

Definitions

Supply base providers consist of the following: brokers, co-packers, re-packers, special packers, suppliers, warehouses, distributors, and licensees.

Broker

An agent who negotiates and contracts the purchase of equipment, ingredients, materials, packaging or services that are used in the manufacture of Campbell products.

Co-packer

An outside manufacturer who uses ingredients and packaging materials and converts them into a finished product.

Repacker

An outside manufacturer who takes "parent" or "work in process" (WIP) product produced either internally or at another external location and packs the products into a primary packaging (shelf ready) format. There is direct product exposure to the environment.

Special packer

An outside manufacturer who takes primary packages and converts them into different finished configurations (e.g. club items, pallet displays, promotional packs, etc.). There is no direct product exposure to the environment.

Supplier

A provider of equipment, ingredients, materials, packaging, or services.

Warehouse

A location which stores Campbell ingredients, materials, packaging, or finished products.

Distributor

A third party who is granted authorization to distribute products to retailers.

Licensee

A third party who is granted authorization to manufacture, distribute, and/or market a product using any of Campbell brand names.

Requirements

Supply base providers shall be knowledgeable and comply with the following:

- All federal, local, regional and state regulatory requirements,
- International regulatory requirements for products being exported (where the ingredients or packaging materials will be used)
- Religious requirements where appropriate (Kosher, Halal, etc.)
- Requirements pertaining to Organic or Natural claims
- Requirements as described in this manual.

Supply base providers shall ensure their suppliers are in conformance with these requirements.

Supply base providers are responsible to ensure products produced for Campbell are safe and conform to Campbell's food safety and quality standards.

3.0 – MANAGEMENT RESPONSIBILITY

Quality Policy

Supply base providers shall have a quality policy stating their commitment to manufacturing food products that are safe, conform to specifications, and comply with all regulations in the locations where product is manufactured, stored and distributed as well as the locations of intended use.

The Quality Policy shall be communicated and understood by all levels of management and employees.

Organization Responsibility & Authority

Supply base providers shall have documented organizational programs that describe the responsibilities, authorities, and interactions of the people who manage, perform, and verify work required. This would include, but not limited to, managers, supervisors, coordinators, auditors, lab analysts, and operators.

Resources

Supply base providers should identify and document resources that are required in the quality plans (including training) for the management, performance of work, and verification activities including internal quality auditing.

Management Representative

The facility principal executive shall appoint a management representative who is authorized to:

- Establish, implement and maintain a food safety and quality system, which assures the manufacture of safe and quality products (for example HACCP).
- Report/review the performance of the food safety and quality system to plant management.

Management Review

The plant's principal executive and management team shall conduct reviews of the food safety and quality system (including HACCP) to ensure its continuing suitability and effectiveness in satisfying the requirements of the plant's quality policy and objectives. Records shall be kept of these reviews.



4.0 – FOOD SAFETY AND QUALITY SYSTEM

Policy

Supply base providers shall have a documented system in place to ensure compliance with this manual, all regulatory requirements, and any and all Campbell specifications.

Definition

Food Safety and Quality Systems:

Organizational structure, policies, programs and procedures needed to manage product safety and quality.

Requirements

The food safety and quality systems shall be documented and include policies, programs, procedures.

Systems must show clearly defined responsibilities and include:

- Who has responsibility for each activity
- What happens during each activity
- When and how often the activities occur
- Record requirements
- Corrective actions if activity does not occur or specifications or requirements are not met.

There shall be a process in place to ensure the most current policies, programs, formulas and procedures are properly distributed to functional areas of the supplier facility.

Periodic and/or routine audits of the food safety and quality systems shall be conducted to verify its effectiveness and to identify improvement opportunities.

Independent 3rd party audits of the food safety and quality systems should be conducted using one of the GFSI (Global Food Safety Initiative) recognized standards: SQF 2000 (Safe Quality Food), FSSC 22000 (Food Safety System Certification), IFS (International Food Standard), BRC (British Retail Consortium), or Global Red Meat Standard. Campbell will decide on the applicability and equivalency of other audit standards as well as designate the audit frequency.

5.0 – FOOD SAFETY AND QUALITY PROGRAMS, POLICIES AND PROCEDURES

Policy

Supply base providers shall include, as part of their food safety and quality systems, programs contained in this manual as well as any additional requirements from a Campbell business unit or regulatory agencies.

Definition

Food Safety and Quality Program: As part of the food safety and quality system, a logical sequence of actions designed to assure specific product safety, quality requirements, and specifications are met.

Conformance to Specifications /Process Control /Inspection and Testing

The supply base provider shall have policies and process control procedures in place to ensure products meet all Campbell requirements and specifications. Where appropriate, statistical methodology will be used to determine system capability. Plant personnel shall have access to the most current process control procedures, product requirements, and specifications. In-process and/or finished products are inspected and tested to ensure conformance to these requirements and specifications. Records are to be kept of inspections, process data, and testing results.

Thermal Process Approval for Shelf Stable Products

Thermal process systems and process schedules for shelf stable co-packed or licensed products shall, prior to being made available, be reviewed and authorized in writing by a Campbell Process Authority or a third party Process Authority who is recognized and/or approved by a Campbell Process Authority. Any process deviations, maintenance work, and changes to the process, processing equipment, processing software, and/or process schedule must be approved in writing by the responsible Process Authority prior to implementation.

Good Laboratory Practices

All supply base provider internal laboratories and third party laboratories contracted by the supply base provider who perform analytical testing on ingredients and finished products used and/or produced for Campbell's shall comply with Good Laboratory Practice (GLP) requirements as set forth by current laws and regulations at the location in which products are produced and the destination to which products may be delivered. The laboratories shall have documented testing procedures which are 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). All analysts shall receive proper training in each test method they perform and shall demonstrate proficiency in performing these tests.

Fill Control

Supply base providers shall have a fill control program that complies with all applicable regulatory requirements. The fill control program shall include the application of statistical process controls, scale calibration, corrective action plans, and guidelines for handling non-conforming product that meet federal, local, country, regional, and/or state requirements.

6.0 – WATER SUPPLY / ICE / STEAM / COMPRESSED AIR

Water Supply

An adequate supply of potable water with appropriate facilities for storage, distribution and temperature control shall be available whenever necessary to assure safety and suitability for food.

Potable water shall meet the requirements as specified in the US EPA National Primary Drinking Water Regulations, the latest edition of World Health Organization Guidelines For Drinking Water Quality, or water of a higher standard. All potable water systems must be protected against backflow (anti-siphonage) from potentially non-potable water e.g. chemical dosing equipment. Backflow (anti-siphonage) devices shall be tested at minimum annually.

Non-potable water (for use in fire control, steam production, refrigeration, and other similar purposes where it would not be exposed to/used in food) shall have a separate system. Non-potable water systems shall be identified and shall not connect with, or allow siphonage into, potable water systems.

Water potability shall be verified by a certified laboratory at minimum annually.

Re-circulated water must be treated and/or filtered and tested at a designated frequency to verify potability.

Ice

Ice used in the direct contact of food shall meet water potability requirements and tested as described above.

Steam and Compressed Air

Steam and compressed air introduced into food or used to clean food contact surfaces or equipment shall be treated and/or filtered in such a way that food is not contaminated with unlawful indirect additives or contaminants.



7.0 – SANITATION PROGRAM

Requirements

A documented sanitation program shall be in place which meets all regulatory and Campbell standards. The program shall assure the cleanliness of the food contact equipment, facility, and storage areas. There shall be a system in place to monitor the critical points of the sanitation process including temperatures, chemical concentrations, flow rates, time, pH, etc. Only cleaning and sanitizing chemicals that are approved for use in food manufacturing facilities shall be used for the specific purposes intended. Cleaning and sanitizing chemicals shall be properly stored and labeled. Programs for managing facility housekeeping shall be included in the plant sanitation programs. A system for verifying, validating, and documenting the effectiveness of the sanitation program shall be in place (audits, swabs, ATP, other).

Definitions

Clean

Free from/removal of dirt, stain or impurities; unsoiled.

Sanitation

Creation and maintenance of hygienic and healthful conditions.

Sanitize

Reduction in the number of vegetative microorganisms; ability to reduce specific vegetative pathogens (i.e. Staph and E.coli) by 5 logs within 30 sec at ambient temperature (ATCC); performed after a thorough cleaning.

Sanitization

The application of cumulative heat or chemicals on cleaned food contact surfaces that, when evaluated for efficacy, yield a reduction of 5 logs, which is equal to 99.999% reduction of representative microorganisms of public health importance (Food Code).

Disinfect

Eliminate all vegetative organisms, excluding spores.

Validation

Collecting and evaluating data to determine whether the sanitation procedures, when properly implemented, will effectively achieve the minimum sanitation performance criteria.

Verification

Those activities conducted to prove or substantiate that the sanitation procedures are being properly implemented to achieve the desired objective.



Requirements

A documented pest control program shall be in place to effectively prevent pest activity in the facility and/or surrounding area. This 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 equivalent training shall perform pest control activities. Rodent traps, bait stations, insect electrocution devices, and other pest/insect devices in product manufacturing or storage areas shall be serviced at regular intervals and as activity warrants. The placement of pest/insect devices shall be in such a way as not to present a contamination risk to products, packaging, or processing equipment. The locations of pest/insect devices shall be documented and charted in an effort to concentrate on potentially high activity areas (trash docks, pallet storage, etc.). Use of all pesticides (insecticides, fungicides, rodenticides, and fumigants) shall be in accordance with current laws and regulations of the location in which products are produced and the destination to which products may be delivered.

Pesticide Applicators

Only employees under the supervision of licensed or certified pest control operators meeting local regulatory requirements for registration, certification or licensing may apply pesticides. If contract pest control operators are used, the supply base provider shall be aware of the types, amounts, and concentrations of pesticides used and as part of a routine inspection, should accompany the pest control operator on the premises at least quarterly to confirm that label directions and proper practices are followed.

The use of contract pest control operators does not absolve supply base providers from responsibility for any illegal pesticide residues on prod-

ucts shipped to Campbell. Pest control operators shall carry sufficient insurance to indemnify Campbell in the event that products shipped to Campbell are found to contain illegal residues.

Records

Pest control program records shall include but are not limited to:

- Any observed evidence of pest activity in the facility including insects, rodent droppings, trap and/or bait station activity, etc.
- Pesticide(s) used
- Material Safety Data Sheet (MSDS) information for all pesticides used
- Areas treated
- Quantities and concentrations used
- EPA or other appropriate registration number
- Person(s) applying pesticide
- Pest control operator license w/expiration date/ certification / training details
- Pesticide applicator proof of insurance



9.0 – CHEMICAL RESIDUE CONTAMINATION CONTROLS

Requirement

Supply base providers shall have controls in place to ensure that only chemicals, ingredients or additives which are legally permitted and declared, are present in ingredients and packaging materials and are approved in advance by Campbell.

Pesticide Usage

Raw agricultural commodities shall be evaluated to determine if pesticide residues are present. Such evaluation can be conducted through analysis of the commodity or through controlled oversight of the grower, producer and other persons handling the product. Special care shall be taken to ensure that only pesticides approved for the specific purpose, and the specific product, are used on or around those products.

Pest monitoring, treatment guidelines, and alternative controls should be considered prior to recommendations of the use of pesticides. Growers should be encouraged to adopt integrated pest management programs and evaluate all alternative crop management practices in relation to pesticide usage.

Exposure to Chemicals in Storage or Transit

Procedures shall be in place to ensure that products shipped to Campbell have not been exposed to illegal pesticides and do not contain pesticide or chemical residues that exceed regulatory tolerances. It is the responsibility of the supply base provider to ensure that any pesticide used in direct contact with any processed food product or ingredient is applied in accordance with label directions and is approved for the purpose intended.

Residue Detection Programs

Programs shall be in place to ensure that ingredients sold to Campbell including but not limited to vegetables, fruit, meat, poultry, fish, and milk products do not contain illegal residues of any drugs, pesticides, or chemicals. This includes any residues contributed by food contact packaging. Test results shall be made available to Campbell upon request.

10.0 – GOOD MANUFACTURING PRACTICES

Requirement

All plant personnel, visitors, maintenance, and outside contractors shall comply with Good Manufacturing Practice (GMP) requirements as set forth by current laws and regulations of the location in which products are produced and to which products may be delivered. Supply base providers shall establish and maintain documented GMP's and product protection procedures to ensure product and materials are handled, stored, packed, and delivered under controlled conditions to maintain food safety and quality. Such requirements shall be communicated to personnel, prominently posted within the facility, and continually monitored. The requirements shall effectively address:

- Personal hygiene and hand washing
 - Hot/Cold Water
 - Liquid/Powder Disinfecting Soap
 - Single Use Towels or Air Dryers
 - Hand Sanitizers
 - Hands Free Equipment
 - Fingernails: clean, short, no polish, and no false or acrylic nails
 - Footbaths and/or Floor Sprayers
 - Sticky/Lint Rollers and/or Air Curtains/Hair blowers
- Infectious/Communicable Diseases and Wounds/Cuts/Abrasions
 - Blue Medical Metal Detectable Bandages
 - Sneezing/Coughing/Illness
- Protective Clothing
 - Uniforms: no buttons and no pockets above waist (strongly recommend pocket-free)

- Gloves: adequate product contamination controls and colored (e.g. blue)
- Single use aprons, arm protection, gloves, etc. strongly recommended
- Hairnets and Beard Guards (strongly recommend single use)
- Jewelry
- Eating/Drinking/Smoking
- Storage/Carrying of Personal Items
- Changing Areas/Locker Rooms
- Daily Housekeeping/Cleaning

Such rules shall be communicated to plant personnel and prominently posted within the supply base provider's facility as appropriate.

Facility and Equipment

Supply base providers shall maintain their facilities and equipment in a condition which fully complies with all federal, local, country, regional, and state requirements relating to the manufacture of safe products in keeping with internationally recognized good manufacturing practices. The grounds surrounding the facility and storage areas shall be kept in a condition that will protect against contamination of products and the facility. All areas, internal and external, shall have proper drainage. A preventive maintenance program shall be in place to ensure that equipment does not become a source of contamination.

11.0 – EMPLOYEE TRAINING

Policy

Supply base providers shall have a planned, functional, and effective training program for all personnel including but not limited to full time, seasonal, part-time, temporary, and contractors.

Training shall include, but not be limited to the following topics: HACCP/food safety, chemical control, MSDS, allergen control, food hygiene, sanitation, calibration, laboratory practices and testing, internal auditing, regulatory requirements, maintenance, food defense, and GMP practices.

Training programs shall be documented, maintained, and training records kept which include list of participants with signatures of completion, date, training contents, and effectiveness evaluations.

Refresher training shall be conducted at minimum annually.



12.0 – SOCIAL RESPONSIBILITY AND SUSTAINABILITY

Policy

As a socially responsible corporate citizen, we continue our 140-year heritage of delivering safe, high-quality, affordable, convenient products with improved nutritional value, which we market responsibly and continually enhance our food safety and quality systems to better meet consumers' needs. We minimize our environmental impact by advancing sustainable business practices that meet today's needs while supporting future generations. We nurture an exceptional workplace with inclusive development opportunities and a culture in which our diverse, talented employees can flourish and make a difference. We also engage the communities where we live, work, and market our products to nourish the minds, bodies, and spirits of our neighbors and consumers.

We recognize the role our supply base providers play in our success as a responsible and ethical corporate citizen. We expect the workplace and operational performance of our supply base providers to be, at a minimum, consistent with legal and industry requirements in the areas of human rights, ethics and environmental performance

Requirements

Legal Compliance

Supply base providers shall strive to adhere to laws of the countries in which it operates, including those pertaining to employee health and safety, terms and conditions of employment and the environment.

Employee Health and Safety

Supply base providers shall provide a safe operating environment that meets the higher of either the applicable legal standards or industry workplace standards.

Environment

Supply base providers shall adhere to all applicable environmental laws of the country, region and city of operation. Suppliers are encouraged to exceed such requirements so as to reduce the environmental impact of their operations.

12.0 – SOCIAL RESPONSIBILITY AND SUSTAINABILITY

Employment Standards

Minimum age of workers

Supply base providers shall not employ workers that are younger than 15 years of age (or 14 years of age where consistent with International Labor Organization guidelines and the local law allows such exception) or the age for completing compulsory education, or the minimum age established by law, whichever is greater. Supply base providers shall observe all legal requirements for work of employees under 18 years of age, including those pertaining to hours of work and working conditions.

Voluntary employment

Supply base providers do not use involuntary or forced labor, indentured, bonded or otherwise.

Wages and employment benefits

Supply base providers pay at least the minimum total compensation required by local law, including all mandated wages and overtime rates, allowances and benefits.

Working hours and rest periods

Supply base providers ensure employees' hours worked shall not, on a regularly scheduled basis, exceed the lesser of (a) legal limitations on regular and overtime hours in the jurisdiction in which it manufactures or (b) 48 hours per week plus 12 hours of overtime or (c) the regular work week plus 12 hours of overtime. In addition, except in seasonal business circumstances, all employees shall be entitled to at least one day off in every seven-day period.

Discrimination

Supply base providers maintain employment practices -- including hiring, remuneration, benefits, advancement, termination and retirement -- that are based on ability and not on beliefs or any other personal characteristics.

Freedom of association

Supply base providers recognize and respect the right of their employees to freely associate, or not to associate, with third party organizations such as labor organizations, as well as the right to bargain collectively in accordance with local laws.

Fair treatment

Supply base providers provide a work environment free of harassment, abuse or corporal punishment in any form.

13.0 – WAREHOUSE STORAGE

Policy

Supply base providers shall store packaging materials, ingredients and finished product in a manner as to prevent contamination (direct or environmental) and/or degradation. If outside storage (dry storage, freezer, cooler) is to be used by the supply base provider, the facility must be approved in advance by Campbell. The warehouse must be inspected by either a representative from Campbell or from a Campbell approved third party.

Requirements

Supply base providers warehouses and their approved outside warehouses, must have all of the appropriate documentation in place as described in this manual as well as the following:

- Temperature and humidity controls
- First In, First Out (FIFO)
- Proper storage of product off floors and away from walls
- Segregation of food / non-food / raw / cooked products
- Segregation of hazardous materials from food
- Fire control program
- Regulatory inspection, if required

The facility shall only be used for food storage and logistics related services.

The facility should utilize pallet racking systems, wherever possible, to avoid pallet stacking.

14.0 – REWORK CONTROL

Policy

Supply base providers shall have a system in place to control the use of rework materials in any products, ingredients or packaging materials.

No undeclared ingredient may be added to a product, packaging material or ingredient in the form of rework, regrind or the like. Add-back material is permitted only at levels agreed to by Campbell and must be deemed safe (free of pathogens, residues, foreign material, etc.) and of identical formulation. The intent of this policy is to prevent the addition of materials that may cause an allergic reaction among consumers and to meet all aspects of proper labeling of Campbell's final consumer products.

Requirements

Product formulas and processing directions shall have specific provisions regarding the use of rework material. These provisions shall include:

- amount of rework to be used
- acceptance criteria

- conditions of storage
- reprocessing steps
- identification of allergens
- use in identical products
- age limitations with microbiological testing data
- special handling requirements
- lot number identification for traceability

All rework material shall be identified and segregated as appropriate. Microbiologically sensitive rework shall receive a validated "kill step" prior to or during the rework process. In the event that a "kill step" is not used, the product to which the rework was added must be microbiologically tested following the rework process. If a pathogen is found in the finished product, rework can not be added back unless a "kill step" is involved.



15.0 – HEAVY METALS COMPLIANCE

Policy

Supply base providers of food products, ingredients, direct food contact packaging materials or promotional items (mugs, bowls, etc.) shall furnish a Heavy Metals Warranty. Co-packers and licensees shall obtain a Heavy Metals Warranty for any ingredients, direct food contact packaging materials, or promotional items used for products they manufacture.

Definitions

Heavy Metals:

Silver, arsenic, barium, tin, antimony, selenium, lead, mercury, cadmium and hexavalent chromium.

Packaging Components:

All elements of packaging including adhesives, labels, inks, dyes and stabilizers.

Requirements

Supply base providers shall certify for all food product, ingredients, direct food contact packaging, and promotional items that heavy metals are not intentionally introduced into Campbell's products or product components and comply with all applicable regulations, food standards, and specifications.

Supply base providers shall also certify that direct food contact packaging materials supplied to Campbell's or used for any Campbell's labeled products contain less than a combined total of 100 ppm of the following heavy metals from any source regardless of how introduced:

Lead, Mercury, Cadmium, Hexavalent Chromium

To assure compliance, supply base providers shall conduct periodic or routine monitoring of food products, ingredients, direct food contact packaging, and promotional items

Rejected Materials

Materials rejected due to heavy metal contamination shall be disposed of in a manner consistent with all applicable laws and regulations for disposing of such materials. Supply base providers shall indemnify Campbell against all such disposals.

16.0 – PURCHASED MATERIALS CONTROLS

Policy

Supply base providers shall have controls in place to ensure purchased materials conform to required purchase specifications and applicable regulatory requirements.

Requirements

A program shall be in place to approve suppliers of purchased materials that are used for manufacturing Campbell products, including ingredients and food contact packaging. This program shall include the periodic evaluation of the supplier's performance and facilities as well as incoming product assessments. Supply base providers shall have written specifications for purchased materials, which shall be in compliance with all federal, local, country, regional and state regulatory requirements.

A program shall be in place to ensure purchased materials that do not meet specifications or government regulations are placed on hold until proper disposition can be made. Product disposals shall be conducted according to applicable regulatory requirements.

Co-packers shall have a system in place to notify Campbell, in writing, of any ingredient or packaging material supplier changes.



17.0 – NOTIFICATION OF CONTRACT MANUFACTURER / CO-PACKER USE

Policy

Supply base providers shall notify Campbell of any products, ingredients or packaging materials which are produced in a plant not wholly owned and/or operated by the supply base provider. Campbell must approve the use of a subcontractor in advance. These contract supplier locations must meet the requirements of this manual and all specifications for products and packaging. They shall also consent to being audited by representatives from Campbell.

Requirements

Supply base providers shall require their Contract Manufacturer or Contract Packer to carry the same insurance coverage and assume the same indemnification of Campbell as the primary supply base provider. In addition, no assumption of liability by the Contract Manufacturer or Contract Packer shall negate the primary supply base provider's responsibility to Campbell to indemnify and insure against any and all claims resulting from the actions of any Contract Manufacturer or Contract Packer.



18.0 – PRODUCT HOLD AND RELEASE CONTROLS

Policy

Supply base providers shall have effective documented controls in place to prevent the inadvertent shipment of non-conforming products, ingredients, or packaging materials to Campbell or to the trade. Withheld or rejected products or materials shall not be shipped to Campbell

Requirements

Supply base providers shall have documented procedures to, withhold from the chain of distribution, products suspected of nonconformance or which are awaiting test results. These documented procedures shall be current and pertain to the entire hold and disposition process, including responsibility for communicating information between internal and external parties, including Campbell's, as applicable.

Any products, ingredients or packaging materials suspected to be non-conforming shall be placed on hold immediately upon discovery. Each pallet or module shall be physically identified as "ON HOLD" or words to that effect. The method used for identification (tags, stickers, signs, etc.) shall be used only for withheld materials and products. Withheld materials should be placed in a dedicated or segregated storage area.

When delivery commitments are at risk of not being met, a process shall be in place to notify Campbell immediately.

If product, packaging materials or ingredients

are inadvertently or improperly released from hold status, Campbell must be notified immediately.

Documented authorization shall be required for all disposition actions. Disposition shall be determined and completed in a timely manner and shall include code dates and quantities involved. Product disposals shall be conducted according to applicable regulatory requirements.

Product designated for destruction shall be handled in a way to assure proper defacement and disposal so that it can not possibly enter the stream of commerce or consumption. Procedures for destruction shall include confirmation requirements, especially for food safety issues. 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.

An audit of the hold and release program shall be conducted at least annually.

Each non-conformance that led to a product or material hold shall be evaluated for root cause. Corrective action shall be taken and documented to prevent like situations from recurring.

19.0 – NOTIFICATION OF RECYCLED MATERIAL USAGE

Policy

Supply base providers of packaging materials to Campbell shall have a system in place to notify Campbell of any products supplied to Campbell that contain post-consumer use of recycled materials

Definitions

Post-Consumer Use: Product which has been in trade channels, used for its intended purpose and then placed into recycling channels.

Recycled Materials: A post-consumer use material that has been treated, salvaged, refurbished or otherwise reworked for re-use.

Requirements

The Campbell's Contract Representative shall be advised when recycled materials are being used in packaging materials being produced for Campbell. Supply base providers shall be responsible for ascertaining the food additive status of the recycled materials.

The Campbell's Contract Representative shall be advised prior to any reformation, change of supply base providers, or other action bearing on the use of recycled materials for products purchased by or for Campbell.



20.0 – TRACEABILITY

Policy

Supply base providers shall have a system in place to effectively and efficiently identify and trace ingredients, direct food contact packaging materials and finished product as well as transporters of such materials. Traceability and documentation/records shall meet all regulatory requirements for tracing forward and backward in the process.

Traceability of Ingredients and Packaging Materials

Procedures shall be documented and implemented for identification of ingredients and packaging materials from receipt through production, including rework product. Records shall be kept either on manufacturing check sheets or other suitable records and shall include specific information including plant lot, vendor name, vendor codes, and quantities used. Mock ingredient and packaging traces shall be conducted at minimum once per year to test the effectiveness and efficiency of this process.

Product Coding

Product coding of individual containers and shipping cases must comply with Campbell's business requirements and all federal, local, country, regional, and state regulatory requirements at the location of manufacture and location of use by Campbell's. Campbell will provide the supply base provider with a coding

format for individual containers and shipping cases.

Product Coding

Finished product releases shall be in a positive format - either in writing or electronic.

Shipping Records

Shipping records for supply base providers shall include the following information - product description, packaging configuration, product code, production code, pallet number(s), shipping location, quantities, and transporter information.



Finished Product Recalls

Supply base providers must have a documented system for tracking and recalling product. In the event of an actual recall, the supply base provider will be contacted directly by the appropriate Campbell Representative. Supply base providers shall never initiate a recall of any Campbell's product without prior authorization.

Traceability effectiveness of finished product must be routinely verified by conducting mock recalls. Co-packer, Re-Packer, Special Packer, and Warehouses shall complete this exercise at least quarterly (every three months) or more often depending on plant performance and business requirements. Suppliers shall complete this exercise at least twice per year (every six months) or more often depending on plant performance and business requirements.

Finished Product Recall Tolerances

The goal during any recall event, mock or actual, is to reconcile 100% of the finished product that was shipped against the quantity of finished product that was manufactured and delivered to the warehouse for shipping. This exercise is to be completed as quickly as possible (not to exceed four hours). Minimum recall tolerances are noted below, but specific business unit quality requirements may require tighter tolerances. The supply base provider shall have a documented corrective action procedure in place in the event the mock recall results exceed upper or lower tolerance limits.

Cases / Units Manufactured	Lower Tolerance Limit	Target	Upper Tolerance Limit
1 – 100	98.0%	100.0%	105.0%
101 – 500	98.5%	100.0%	105.0%
501 - 1,000	99.0%	100.0%	105.0%
1,001 – 10,000	99.5%	100.0%	102.0%
10,001 - 20,000	99.5%	100.0%	101.0%
> 20,000	99.5%	100.0%	100.5%

21.0 – EQUIPMENT CALIBRATION PROGRAM

Policy

Supply base providers shall have a documented program to ensure that measurement, analytical, and processing equipment is in calibration.

Requirements

The program shall meet any regulatory and industry requirements. The supply base provider shall identify each piece of equipment that is critical (i.e., equipment affecting quality and product safety), and determine calibration requirements, frequency and responsibility. Calibration or maintenance frequency is determined based on the critical nature of the measurement, past history of calibrations, and/or equipment supplier recommendations. Critical test equipment is to be calibrated using certified or other acceptable industry standards.

A corrective action process shall be in place if equipment is determined to be out of calibration. Previous lots of product shall be re-evaluated for conformance to specifications and critical limit measurements, and shall be held if the requirements or specifications are not met.

Procedures and Records

Instructions for calibration of equipment must be documented if the work is done internally. Records of calibration activities are to be kept.



22.0 – FOOD DEFENSE AND PLANT SECURITY

Policy

Supply base providers shall have plans/programs in place that will ensure proper protection of ingredients, packaging materials, and finished product. Access to the facility shall be limited to authorized personnel only. Each facility shall have a written food defense and plant security plan. In addition, each facility shall conduct and document an assessment to determine potential gaps. Items to consider in the assessment should include:

- Self-locking access doors
- Company-issued clothing or identification badges to identify employees, visitors and contractors
- Instructions for truck drivers and delivery personnel
- Use of seals to secure shipments; verification of seal numbers with bills of lading
- Use of surveillance tools, cameras, etc. to monitor the premises
- Perimeter security, fences, locked doors and gates
- Audits to evaluate effectiveness of security controls
- Control of access, i.e. guards, access cards, etc.
- Security measures in force, 24 hours per day, 7days a week
- Areas of increased concern, for example, outside storage tanks for cleaning chemicals, coolant, ingredients, etc. – monitoring of these areas
- Defined responsibility for monitoring, controlling, and authority to take immediate action
- Procedures in place for investigating any food security situation
- Procedures for handling deliveries
- Inspection of incoming transport vehicles for possible contamination
- Assessment of normal routes of entry by employees, etc
- Assessment of other entrances to the facility that are not normally used as a point of entry, i.e., escape doors, equipment room entrances, windows, heating/air conditioning duct entrances, trash ducts, water treatment, etc.; control of access to these areas
- Procedures for trucks entering the facility boundaries
- Control of access into the facility by truck drivers

Outside Premises

Items to consider for the outside premises include:

- Identification of outside boundaries to control access.
- Physical measures in place (fencing or other barriers) to prevent unauthorized access
- Inclusion of all structures and contents in assessment
- Adequacy of outside lighting

22.0 – FOOD DEFENSE AND PLANT SECURITY

Inside Premises

Items to consider inside the premises include:

- Procedures for investigating any food security situation inside the plant
- Program for identification and segregation of restricted areas in the plant
- Access of contractors in the facility limited to areas relevant to their work
- Plans that identify all entrances/exits, openings for vents, pipes, electrical lines, drains, air circulation, etc
- Programs to prevent security breaches with control panels, air circulation lines, electrical boxes, gas or pressure valves, etc
- Potential for certain equipment to be clandestinely accessed for the purpose of introducing a contaminant
- Plan that identifies all areas where products and ingredients are handled and stored, e.g. off-site warehouses, refrigerated coolers and freezers, controlled atmosphere storage facilities
- Monitoring and inspection of lines that handle water, syrup, oil, bulk ingredients, etc
- Security of computer software and hardware that document and control food processing, password protection, controlled by authorized personnel
- Security practices to prevent any compromise of information technology, data storage systems, and servers
- Procedures and/or physical barriers in place to restrict access to hazardous compounds such as pesticides, cleaning and sanitizing chemicals, etc.

Incoming Materials

Items to consider for incoming materials should include:

- Security controls at supply base providers
- Use of tamper evident features for ingredients and supplies
- Review and maintenance of records of previous products transported in tankers, railcars, shipping containers, etc
- Institution of food security programs to address potential risks on the farm
- Security of off-site facilities, warehouses, controlled atmosphere storage, etc

Transport Security Procedures

Items for transport security shall include:

- Protocol for verification of seal numbers with bills of lading and procedures for noncompliance
- Security procedures for drivers when docking or stopping, or faced with suspicious circumstances

Personnel

Items to consider regarding employees, applicants and visitors should include:

- Facility access restricted for applicants
- System for employee identification such as photo ID's
- Background/verification checks
- Training program for employees, emergency procedures, reporting of suspicious situations and/or wrong doing, product tampering, etc.
- Recruitment practices of outside hiring source.
- Restrictions on leaving facility during normal work hours
- Procedures and restrictions on visitors

23.0 – SECURITY AUDITOR ACCESS

Policy

Supply base providers shall permit Campbell Global Security Representatives access to facilities used to manufacture, pack, or hold finished products, packaging materials, and ingredients.

Requirements

Campbell's Global Security Representatives shall be authorized to enter and audit/inspect at reasonable times any establishment storing, supplying or co-packing finished products, packaging materials, and ingredients for Campbell.

The audit/inspection may include review of facilities, interior and exterior, to ensure those facilities are in compliance with the security standards established by and for Campbell.

Limitations

An audit/inspection shall not extend to financial data, sales data (other than that directly related to Campbell), pricing data or personnel data (other than data as to qualifications of technical and professional personnel performing functions pertinent to the audit, or governmental requirements with respect to personnel practice).

Notification

It is Campbell's policy to give reasonable notice of intent to conduct an audit/inspection. However, nothing in any contract or this manual shall deny the right of Campbell to conduct unannounced audits by its own representatives, or through firms/agencies that conduct audits under contract. Upon arrival at the facility, security auditors/inspectors shall be required to provide positive identification and/or other credentials to attest to their identity.



24.0 – QUALITY AUDITOR ACCESS

Policy

Supply base providers shall permit Campbell's Quality Auditing Representatives access to facilities used to manufacture, pack or hold finished products, packaging materials, and ingredients.

Requirements

Campbell's Quality Auditing Representatives shall be authorized to enter and audit/inspect at reasonable times any establishment storing, supplying or co-packing products, packaging materials, and ingredients for Campbell.

The audit/inspection may include review of records, processes, controls and facilities which demonstrate that products produced for Campbell meet specifications and expectations, regulatory requirements and internal process control criteria.

Limitations

An audit/inspection shall not extend to financial data, sales data (other than that directly related to Campbell), pricing data or personnel data (other than data as to qualifications of technical and professional personnel performing functions pertinent to the audit, or governmental requirements with respect to personnel practice).

Notification

It is Campbell's policy to give reasonable notice of intent to conduct an audit/inspection. However, nothing in any contract or this Manual shall deny the right of Campbell to conduct unannounced audits by its own representatives, or through firms/agencies that conduct audits/inspections under contract.



25.0 – HACCP (FOOD SAFETY CONTROL PROGRAM)

Policy

Supply base providers shall have a documented Food Safety Control Program to manage all physical, chemical, and biological hazards. The food safety control program shall comply with the principles of HACCP (Hazard Analysis Critical Control Point) to ensure the safe manufacture of products.

HACCP Standard

The principles of HACCP are based on Codex Alimentarius.

Requirements of a Food Safety Control Program

The food safety control program shall have the following elements and have signed approval by top facility management:

A trained, multidisciplinary food safety team shall be in place that is 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.

A detailed process flow diagram shall exist with clearly identified CCP's. The diagram shall also be signed and dated by the food safety program team leader; and remain current.

A. Hazard Analysis (Principle 1)

- A hazard is a physical, chemical, or biological agent that is reasonably likely to cause illness or injury in the absence of its control.

- Identify potential physical, chemical, and biological hazards associated with the product, ingredients, packaging materials, and process, including intended customer/consumer use.

B. Identification of Critical Control Points (Principle 2)

- Critical Control Point (CCP) is a point, step, or procedure at which control can be applied and a food safety hazard can be prevented, eliminated, or reduced to acceptable levels.
- Determine the points / procedures / operational steps that can be controlled to prevent, eliminate the hazard(s) or minimize its likelihood of occurrence at every stage of food production and/or manufacturing of raw materials, their receipt and/or harvesting, transport, formulation, processing, storage, etc.

C. Establishment of Critical Limits (Principle 3)

- Define the parameters which separate acceptability from unacceptability to clearly identify when a process is out of control.

25.0 – HACCP (FOOD SAFETY CONTROL PROGRAM)

D. Monitoring Procedures (Principle 4)

- Procedures shall be established to detect the control of each CCP and include frequency of monitoring, records and storage of monitoring data, and persons responsible for monitoring.

E. Establishment of Corrective Actions (Principle 5)

- Corrective actions shall be established for each CCP, including but not limited to actions required to bring the process back into control, necessary actions to prevent a reoccurrence, and product-withholding procedures for non-conforming product.

F. Establishment of Validation and Verification Procedure (Principle 6)

- Procedures shall be established to validate the adequacy in controlling the food safety hazards identified during the hazard analysis, and verify that the HACCP plan is being effectively implemented.

G. Establishment of Documentation and Record-Keeping Activities (Principle 7)

- Documentation shall be available, covering all processes, procedures, measures, actions, and records.
- Records must be in ink and initialed or signed with no blank or missing data. A single strike through for errors, no white out is to be used.

HACCP Process Review and Approval for Refrigerated and Frozen Products

Co-packed and licensed non-shelf stable refrigerated and frozen products shall have a validated food safety program in place that complies with the principles of HACCP (Hazard Analysis Critical Control Point). The HACCP program shall be reviewed by the appropriate Campbell quality representative to assure the appropriate hazards have been identified and controlled. The quality representative shall also review the HACCP plan with appropriate Campbell Global Food Safety professionals at Campbell World Headquarters to assess microbiological and chemical hazards.

Policy

Supply base providers shall have control procedures in place to prevent the presence of undeclared allergens in products and on product labels. Undeclared allergens shall not be introduced into product by any means, including but not limited to, rework, regrind, trimming or equipment cross-contact.

Definition

Food allergens are foods or food constituents known to produce an adverse or allergic reaction in food sensitive subpopulations. These reactions may include, but are not limited to, adverse effects on the gastrointestinal tract, skin and respiratory system and, in extreme and rare cases, anaphylactic shock.

Identification of Allergens and Ingredients of Concern

The following have been identified by Codex and Campbell major food allergens and ingredients of concern. These ingredients must be controlled and appropriately labeled:

- Cereals containing Gluten (wheat, rye, barley, oats, spelt, or their hybridized strains)
- Crustaceans and products thereof (shrimp, etc.)
- Eggs and egg products
- Fish and fish products (cod, salmon, etc.)
- Peanuts and products thereof
- Soybeans and products thereof (includes soy lecithin and soy flour)
- Milk and milk products (including lactose)
- Tree Nuts (almonds, walnuts, hazelnuts, Brazil nuts, cashews, macadamia nuts, pecans, pine nuts, pistachios, coconut, etc.)
- Sulphites (Sulfites) in concentrations of 10 mg/kg or more
- Mollusks and products thereof (clams, etc.)
- Sesame Seeds and products thereof

Certain areas/regions/countries of the world have regulatory requirements for allergens and ingredients of concern, in addition to those identified above. Controls shall be in place and products appropriately labeled, where required:

- Lupin and products thereof
- Celery and products thereof
- Mustard and products thereof
- Wheat and products thereof
- Carmine and products thereof
- Artificial (Synthetic) Coloring Agents

Sanitation Standard Operating Procedures

Products containing allergens shall be properly labeled. If any identified allergens are used directly in or as a component of any added ingredient, formalized procedures must be in place to control them.

Supply base providers are responsible for developing effective cleaning and Sanitation Standard Operating Procedures (SSOP's) specific to their plant manufacturing requirements, equipment, and environment. SSOP's shall be detailed and include description and scope of the cleaning procedures, equipment and products, and responsible parties. Procedures shall also include details for preventing cross-contamination due to the use of tools, shovels, scoops, or any other equipment or process. Both the validation and verification procedures must be well defined with the intention and scope of the procedures and requirements for final acceptance based on test methods employed. Accurate written records of cleaning,

validation and verification shall be maintained. Periodic review and auditing of the cleaning program shall occur including annual review of validation and verification efforts. The use of either a chemical or hot water clean-up will be left to the discretion of the individual supply base provider's Quality Manager. Moreover, each facility has the responsibility for auditing to verify the successful use of appropriate procedures, instructions, and materials that will result in a clean production environment with respect to all food contact surfaces.

Allergen control for any of the allergens listed above, as recognized by Campbell, must be designed on a case-by-case basis. All allergens must be considered equally, and appropriate operating controls shall be developed as the manufacturing conditions require. The overall requirement is to prevent the presence of undeclared allergens in products.

Ingredient Storage and Usage

All incoming ingredients shall be uniquely coded, and this coding must be verified upon receipt. Ingredients shall be identified as containing allergens, and all reasonable efforts should be made to store these ingredients in a segregated area of the kitchen, pilot plant, plant, warehouse, cooler, freezer, or other containment area. Ingredients containing allergens shall not be stored above non-allergen ingredients. There must also be provisions to prevent cross-contact due to the use of tools, shovels, scoops, totes, buckets and similar equipment.

Production Scheduling

Production scheduling plays a key role in the management of potential allergen issues. Dedicated allergen lines shall be used whenever possible. Allergen-containing products must be run after non-allergen containing products. It is ideal to run the allergen-containing products that are most challenging to clean at the end of a shift or just prior to a significant clean up of the production equipment and line.

Training

All employees, including seasonal and temporary employees, shall be formally instructed and trained in allergen-control requirements and procedures.

Other Considerations

Regional regulatory requirements, including special requirements for exported products, may dictate that some specific allergens must be added to this core list. This must be done on a region-by-region basis, and will be the responsibility of the specific production facility in accordance with the notification of the Quality, Food Safety, and Regulatory Affairs at Campbell's World Headquarters.

27.0 – SUPPLIER MATERIAL WRITTEN APPROVAL

China Manufactured Ingredients and Direct Food-Contact Packaging Materials

In addition to the Campbell standard supplier food safety and quality system approval and material qualification processes, approval of China-Manufactured ingredients/direct food-contact packaging materials and China-Manufactured ingredients/direct food-contact packaging materials sub-components will be on a case-by-case basis pending a review by Campbell. Consideration shall be given to associated food safety risk factors, sources of supply chain variability, and potential for adulteration. Written approval from Campbell must be obtained prior to supplying China-Manufactured ingre-

dients/direct food-contact packaging materials and/or China-Manufactured ingredients/direct food-contact packaging materials sub-components.

Irradiation – Ingredients and Finished Products

Supply base providers of food products for Campbell may be permitted to use irradiation on a case-by-case basis pending a review by Campbell. Consideration shall be given to the appropriate regulations and technology. Written approval from Campbell must be obtained prior to any use of irradiation.



28.0 – GENETICALLY MODIFIED INGREDIENTS

Genetically Modified Ingredients

Supply base providers of food products for Campbell shall follow the business requirements and labeling regulations of each country for which they provide ingredients and/or services. Genetically modified ingredients shall be identified according to the country requirements.



29.0 – FOREIGN AND EXTRANEOUS MATERIALS CONTROL

Policy

Supply base providers shall have programs in place to prevent contamination with foreign and extraneous materials.

Definitions

Foreign Material: Any material which is not natural to the commodity, such as metal, wood, glass, plastic, stone, paper, cloth, cardboard, and human hair.

Extraneous Material: Any undesirable material that is a natural component of the commodity, such as stems, leaves, seeds, nut shells, clam shells, and, on meat items, feathers, hair and bone.

Requirements

Supply base providers shall conduct a risk assessment to identify potential foreign and extraneous materials hazards.

Supply base providers shall have, as part of their food safety and quality system programs, documented routine physical inspections of the facility to ensure risks are being appropriately assessed and managed.

GLASS and BRITTLE/SHATTERABLE PLASTICS/MATERIALS

Supply base providers shall have a documented procedure in place to exclude glass and brittle/shatterable plastics/materials from all areas where there is potential for product contamination. If unavoidable, the glass and/or brittle/shatterable plastics/materials shall be recorded

and monitored (glass and plastics register). The procedure shall address the breakage of glass and brittle/shatterable plastics/materials including proper precautions to protect all products if breakage does occur. All incidences of breakage shall be recorded and corrective actions implemented. Strongly recommend replacing plastic tools such as utensils, scoops, cups, shovels, etc. with metal wherever possible and/or consider metalized or doped plastics that are detectable by metal detectors or x-ray equipment.

METAL

Supply base providers should have permanent magnets (if applicable) at strategic positions within their processes. Efficiency and strength of these magnets should be tested periodically. Metal detectors shall be included at the finished stage of the process. Exceptions may be granted based on substantiated alternative methodology approved by Campbell. Metal detectors shall be capable of detecting ferrous, non-ferrous, and stainless steel. Sensitivity and metal sizes shall be established based on product attributes and the manufacturing environment that affect detection capabilities. Reject mechanism should be of the fail safe design such that loss of air or control power results in the rejection of all materials or a line stop. In addition, it is also strongly recommended that supply base providers use metal detectable pens and prohibit the use of staples in the production areas.

29.0 – FOREIGN AND EXTRANEOUS MATERIALS CONTROL

continued

WOOD

Supply base providers shall have a documented procedure in place to exclude wood from all areas where there is potential for product contamination. Precautions shall be taken when utilizing wooden pallets. Strongly recommend the use of plastic colored pallets that are metal detectable or detected by x-ray.

EQUIPMENT

Equipment designed for detection and removal of foreign and extraneous material shall be utilized. Documented procedures shall be in place for set-up, routine collection and inspection of rejects, assessments of defects, and corrective actions taken to determine the source. Procedures for the maintenance, calibration, production settings, and verification for all foreign and extraneous material equipment shall be in place. Examples of appropriate equipment include but are not limited to metal detectors, magnets, sifters, x-ray machines, optical sorters, socks, scalpers, trimmers, rock removal devices,

traps, sieves, washers, bone detectors, riffle cleaners/pans, gravity cleaners, peelers, screens, and filters.

TEMPORARY REPAIRS

Supply base providers shall have a documented procedure in place to address temporary repairs. String, plastic, tape, cardboard, wires, etc. shall not be used for permanent repairs but rather only for emergencies and shall be dated, monitored, and replaced in a timely manner.

MAINTENANCE

Supply base providers shall have a documented procedure in place to ensure maintenance work does not become a source of foreign material contamination. The procedure shall include but not limited to tools/parts reconciliation and use and storage food grade lubricants/grease/coolants. In addition, it is also strongly recommended that supply base providers use metal detectable cable/zip ties.

30.0 – PRODUCT PACKAGING AND SHIPPING

Policy

Supply base providers shall have documented systems in place to ensure compliance with the following product packaging and shipping standards.

Requirement

PRODUCT PACKAGING

Plastic Liners:

- Shall have contrasting color to that of its contents and may not be clear or black
- Shall have a minimum thickness of 2 mil = 50.8 micron = 200 gauge
- Shall be folded or knotted not clipped

Paper or Nylon Laminated Polyethylene Bags:

- Should be heat sealed or stitched with string of contrasting color to that of its contents
- Liners should be a thickness that is adequate as to not rip, puncture, or tear easily.

Boxes/Cartons/Cases/Totes:

- All tape shall be colored and may not be clear, tan, or black
- No duct, masking, or filament tape is to be used
- Wire and/or staples shall not be used
- Wooden corner posts are unacceptable

Drums:

- Should have only metal detectable tamper evident closures

Supersacks/Bulk Bags/Bulka Bags:

- Closure strings shall not be too long as to cause potential product contamination
- No exposed or loose string ends shall be present inside the bags

SHIPPING

Pallets/Palletization:

- Shall be well constructed and not broken or damaged
- Shall be free of insects, insect webbing, mold, debris, odor and flaking paint
- Slip sheet or layer pad should be used between the pallet and the product load
- Palletization should be in such a way that there is no excessive overhang or under hang on any side of the pallet
- Product should be evenly distributed across the pallet
- All pallets must have a unique pallet id placard or tag

Temperature Recorders:

- If used, shall be clearly identified on BOL (Bill of Lading) and packaging; and shall be secured to the load.

Policy

Supply base providers shall have documented food safety programs in place to ensure food transport vehicles and food transport businesses used for the transport of food products are inspected and monitored to maintain optimum storage conditions, prevent cross-contamination, and protect product integrity.

Definitions

“Food transport vehicle” is defined as any means of transporting food ingredients, whether self-propelled or not, and whether used on land, by sea, or in the air

“Food transport business” is defined as companies which provide food ingredient transportation services

“Bulk food tank/trailer/container” is defined as a tank, trailer, or container used to transport food with its interior directly coming in contact with the food product

“Bulk container outlets” refer to all access points (discharge outlets, hatches, dip holes, sample points, etc.) to the interior of the tank/trailer/container

Requirement

All food transport vehicles shall be designed and constructed to protect food from being contaminated during transportation.

All food transport vehicles shall be designed and constructed to enable effective cleaning and if necessary, sanitizing. Cleaning records and previous load documentation shall be available on request.

Bulk food tank/trailer/containers

- A certificate of cleaning shall accompany each load. All food transport vehicle wash facilities must be a supply base provider approved facility and subject to inspection. The wash facilities shall have documented cleaning procedures
- A record of previous loads shall be available on request
- Shall be free of cracks, pitting, rough welds, corrosion, foreign objects, molds, pests, and off-odors
- Vehicles shall be designated as “Food Only”. This includes the transportation of fresh ingredients (fruits, vegetables, nuts, beans, etc.) coming in direct contact with the interior of the vehicle.

Requirements

All food transport vehicles must be sealed with a tamper-evident security seal(s), including all bulk container outlets. All seal numbers must be recorded on the Bill of Lading (BOL). For LTL (Less Than Full Load) vehicles, padlock(s) should be considered.

Before loading, all food transport vehicles shall be inspected and results documented.

Loading and unloading areas/ramps shall have protection devices in place to shelter the products from external elements (climate, pollen, dust, etc.)

All loads must be adequately secured.

When products must be transported at a specified temperature, before loading, the temperature inside the food transportation vehicle shall be checked and documented. Additionally, adequate temperature control shall be maintained through transport.

Campbell's will not accept deliveries:

- With products in the same vehicle as non-food chemicals or other potentially hazardous materials
- With fresh/frozen vegetables in the same vehicle as fresh/frozen meat products
- If the food transport vehicle may have been contaminated by poisonous, toxic, hazardous, dangerous, unsanitary materials, or allergen cross-contact

Supply base providers shall have a program in place to ensure the food transport businesses used to transport Campbell products:

- Protect all food from the likelihood of contamination by utilizing foreign material devices when loading and unloading bulk food tank/trailer/container vehicles. These devices include, but are not limited to sieves, filters, screens, and rare earth magnets
- Achieve or are actively seeking industry recognized quality/food safety accreditation such as HACCP or Trucksafe.
- Comply with industry and regulatory transport practices
- Receive on-going GMP, hygiene, quality, and food safety training
- Have food safety control measures in place that are actively monitored and documented.

32.0 – NOTIFICATION OF CHANGE

Change Policy

Supply base providers shall have a system in place to notify Campbell of any changes in formulas, materials, processes, systems, equipment, management, and/or production facility that may impact ingredient statements, functionality, quality, safety or labeling of a finished product.



33.0 – DOCUMENT AND DATA CONTROL

Requirements

Supply base providers shall establish and maintain documented procedures to control all documents and data that relate to the production, processing and control of finished product. This includes, but is not limited to, HACCP programs, formulas and procedures, ingredient specifications, label approvals, standard operating procedures, laboratory manuals and quality records.

This control shall ensure that:

- The pertinent issues of appropriate documents are available at all locations essential to the effective functioning of the quality system.
- Invalid and/or obsolete documents are promptly removed from all points of issue or use, or otherwise dealt with to assure against unintended use.
- Any obsolete documents retained for legal and/or knowledge-preservation purposes are suitably identified.

34.0 – RECORD RETENTION / RETAIN SAMPLES

Policy

Supply base providers shall maintain records for three years or for the time period required by federal, regional, country, state, or local regulations, whichever is the greater time period. All records for products, packaging materials, and ingredients shall be available for review during audits or inspections by Campbell representatives.

Requirements

Records shall be stored in a secure area, shall be easily retrievable and must relate to all critical process safety and quality monitoring points in the manufacturing, storage and distribution of the product, packaging material or ingredient provided to Campbell.

Retrievability of records shall be tested and documented during mock recall exercises.

Retain Samples

Supply base providers may be required to keep retain samples of the product(s) produced. Samples shall be representative of the production run and stored up to the shelf life of the product. Campbell Quality and/or Research and Development representatives will provide specific sampling and storage requirements.

35.0 – CORRECTIVE AND PREVENTATIVE ACTIONS / CONTINUOUS IMPROVEMENT

Corrective and Preventative Actions

Supply base providers shall have a documented process for the management of corrective actions and longer term preventative actions when failures of any part of the quality / food safety system occur. Food safety and quality system procedure, process, or program failures that lead to a non-conformance with Campbell's specifications, manual requirements and expectations, regulatory requirements, or with internal process control criteria, shall be evaluated for root cause. Corrective actions shall be taken to prevent like situations from recurring. Preventative measures shall be designed and implemented to ensure long-term correction of the identified deficiency. Non-conformance notifications from Campbell's must be addressed in a timely manner and responded to via email according to business requirements.

Records shall be maintained by the supply base provider of key performance indicators, such as customer complaints, consumer communications and key process control points. Periodic evaluation of trends shall lead to appropriate corrective and preventative action. Campbell shall be periodically advised of these evaluations and the resultant corrective actions.

Continuous Improvement

Supply base providers are expected to establish, document, implement, and maintain food safety and quality management systems, and continually improve their effectiveness in accordance with this manual. Action plans for continuous improvement are to be developed to address issues related to:

- Quality - Key Performance Indicators (conformance to specifications, % first pass quality, consumer and customer complaints, etc.)
- Cost of product manufactured, product and ingredient yield losses, process efficiency opportunities, etc,
- Work processes (Is the work being done "value added"? Is there waste in the process? Are resources applied to proactively improve the reliability of the process?)
- Customer service (On time shipments, other service issues)
- Internal and external audit results

Action plans and results will be reviewed with Campbell Contract and Quality representatives during performance reviews.

36.0 – CRISIS MANAGEMENT AND BUSINESS CONTINUITY

Crisis Management Policy

Supply base providers shall have a multidisciplinary team in place to manage situations involving food safety, quality, and regulatory issues including plans to manage recall and retrieval activities. Roles and responsibilities, including decision making authority, shall be well defined and documented.

As previous stated in the Traceability section, Supply base providers shall never initiate a recall of any Campbell's product without prior authorization.

Business Continuity Plan Policy

Supply base providers shall have a documented plan in place for the recovery from either a partial or complete interruption of critical functions due to an unforeseen event.

37.0 – LABEL CONTROLS

Policy

Supply base providers shall have proper controls in place to ensure proper labeling of food products, ingredients or packaging materials supplied to Campbell's. Retail and Food Service product labels shall be pre-approved by Campbell's Regulatory Affairs Department.

Definitions

Ingredient / Raw Material / Packaging Label: A label to be used on products intended for further processing.

Retail Product Label: A label to be used on products intended for retail distribution.

Food Service Label: A label to be used on products intended for institutional distribution.

Requirements

Label controls shall be in place during production for on-line inspection and application. Verification procedures shall be in place to prevent inadvertent mislabeling and to verify the correct label version based on the product formulation.

Campbell's will provide written approvals for Retail and Food Service Labels. Approvals will include instructions for special handling, formula and procedure numbers, effective dates, and formula version numbers.

Ingredient / Raw Material / Packaging Labels should include Campbell required product codes (MOA number), lot numbers, production codes, manufacturing plant designation, ingredient names, ingredient statement, net contents statement, and the name of the manufacturer. Ingredient statements shall match the ingredient specification.

All labels shall include proper trademark notice and statements as to trademark ownership. Campbell's trademarks shall not be used in any manner except as pre-approved in writing by Campbell's Legal Department.

38.0 – NOTIFICATION OF REGULATORY CONTACTS / ACTIONS

Policy

Supply base providers shall have a system in place to notify Campbell of any regulatory contact, sample collections, regulatory actions or product retrievals which may relate to products, packaging materials or ingredients produced for Campbell.

Requirements

Supply base providers shall immediately notify the Campbell's Contract Representative when any product produced for Campbell is directly or indirectly the subject of a Regulatory Contact or Regulatory Action.

When any product produced for Campbell is sampled by a Regulatory Agency, a duplicate or split sample shall be taken at the time of collection and all product represented by that sample shall be placed on hold. The Campbell's Contract Representative shall be contacted for instruction prior to shipment to a Campbell's facility or before sale under a Campbell's label. A duplicate sample of the lot sampled by the Regulatory Authorities may be required by Campbell.

Supply base providers shall immediately notify the Campbell's Contract Representative of any voluntary or involuntary product retrieval.



U.S. CONDITIONS OF ORDER

1. Invoicing

Each shipment shall be accompanied by a uniquely numbered Bill of Lading. The Bill of Lading must reference Buyer's Purchase Order, and Buyer's item codes, with reference to quantities/unit counts on the shipment. Unless the Seller has agreed to be paid via Evaluated Receipts Settlement (ERS), materials received without invoice will be held at Seller's risk and expense. If the Seller has agreed to ERS payments, no invoice is required and payment will be initiated with receipt and acceptance of goods delivered. Seller shall conform to Buyer's delivery schedule.

2. Guarantee: Compliance with Food, Drug, & Cosmetic Act & Other Regulations

Seller guarantees that all materials are the best of the grade specified and will conform to the description, quality and performance stated or, if not stated, to standard commercial specifications in the respective industry; and that all food materials and drug materials will comply with all applicable federal and state pure food laws, will not be adulterated or misbranded within the meaning of the Federal Food, Drug, & Cosmetic Act as amended (FDCA), the Federal Meat Inspection Act (FMIA), the Poultry Products Inspection Act (PPIA) (as applicable), and/or all other applicable foreign country regulations, will not contain articles which may not be introduced into interstate commerce and will be free from organisms or chemicals which would make the materials unsuitable for processing under the provisions of Section 404 of the FDCA. (Reference: Title 9 and Title 21, United States Code)

All food materials must conform to the Pesticide residue restrictions imposed by pure food laws.

3. Guarantee: Compliance with Labor Regulations

Seller guarantees that, in accepting and filling the order, Seller has complied and will comply with the Robinson-Patman Act, Section 12 (child labor provisions) of the Fair Labor Standards Act, and all state and Federal laws regarding child labor. In addition, (a) the non-discrimination clauses contained in Section 202, Executive Order 11246, as amended by Executive Order 11375, relating to equal opportunity for all persons without regard to race, color, religion, sex or national origin, (b) the affirmative action clauses prescribed in the regulations of the Secretary of Labor under the Vietnam Era Veterans Readjustment regulations, and relevant orders relating thereto promulgated by the Secretary of Labor (41 CFR Chapter 60), are all incorporated herein by reference to the extent required by law.

4. Guarantee: Free and Clear and Hold Harmless

Seller guarantees that at the time of performance it shall have and shall transmit to Buyer good and marketable title to the articles covered by the Purchase Order, clear of liens and encumbrances of any kind, and free of the rightful claim of any person by way of infringement or the like, whether or not Buyer furnishes specifications; and Seller agrees to defend and indemnify Buyer and hold Buyer harmless from any and all liability, loss, damage and expense arising from any infringement or alleged infringement of any patent, trademark, copyright, trade secret or other right, by reason of the purchase, lease, use or resale by Buyer of any or all of the materials covered by the Purchase Order.

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5. Guarantee: Buyer's Right of Refusal

Buyer may reject either before or after delivery, any materials which do not conform with all specifications and conditions of the order or are not delivered at the stated times, delivery times being of the essence. Delay in Seller's delivery and delay in Buyer's acceptance and payment shall be excused to the extent Seller's production or shipment or Buyer's receipt or use of the materials is prevented by strike or labor dispute, fire, or other circumstance beyond control occurring within Seller's establishment or within the plant where the materials are intended to be received or used; except that nothing herein shall be deemed to prevent Buyer from canceling undelivered materials which are so delayed. Buyer may cancel any portion of this order which remains unfilled after the beginning of any bankruptcy or insolvency proceeding by or against Seller or after the appointment of an assignee for the benefit of Seller's creditors or a receiver.

6. Guarantee: Terms and Conditions of Contract

All terms and conditions are expressed in the contract or agreement between Buyer and Seller, unless otherwise stated in the order. Any and all terms or condition in any offer or proposal submitted by the Seller, or in any correspondence, or otherwise, are superseded and of no further force or effect. Seller's warranties and guarantees survive Buyer's payments and acceptance of the materials.

7. Guarantee: Insurance & Indemnification

(a) Insurance – Seller shall maintain the following insurance policies:

1) Commercial general liability (bodily injury and property damage), naming Buyer as an additional insured; 2) automobile liability; 3) workers' compensation (in the minimum amounts required by state law); and 4) such other insurance policies as may reasonably be required by Buyer (including umbrella policies) with minimum coverage as Buyer may specify. Before work begins, Seller shall furnish Buyer with certificate(s) of insurance evidencing the policies. All such policies shall be issued by such insurer(s) and in such amounts as are reasonably acceptable to Buyer. Seller shall provide Buyer with at least thirty (30) days' prior written notice of any material change in, or expiration or cancellation of any such policy. Without in any way limiting the remedies available to Buyer, Buyer shall have the right to immediately terminate the Purchase Order upon the failure of the Seller to comply with any of the provisions of this guarantee.

(b) Liens – No lien shall be claimed or filed and complete releases of liens shall be furnished prior to payment (for work performed by Seller on Buyer's premises);

(c) Indemnity – Seller shall defend, indemnify and hold Buyer harmless from all claims, liabilities and damages arising from the services or products provided by Seller.

Continued on next page

8. Guarantee: Confidentiality and Trade Secrets

Seller agrees not to use, for any purpose other than the filling of the order, any drawings, blueprints, samples or other information furnished by Buyer ("Confidential Information"). Seller agrees carefully to safeguard as trade secrets belonging to Buyer all such drawings, blueprints, samples and other Confidential Information and to prevent such drawings, blueprints, samples, and other Confidential Information from being seen by persons who do not have actual need to see them to enable Seller to fill the order. Seller agrees, unless otherwise directed by Buyer, to return all such drawings, blueprints, samples and other Confidential Information to Buyer at the conclusion or other termination of work under the order. The obligation of this guarantee shall survive delivery and/or acceptance of any product(s) or services.

9. Environmental Controls

Policy

Supply base providers of ingredients, products, packaging, processing materials and equipment for Buyer shall maintain their operations in compliance with all applicable federal, state and local environmental laws and regulations.

Definitions

EPA:

Environmental Protection Agency

OSHA:

Occupational Safety and Health Administration

MSDS:

Material Safety Data Sheet

Requirements

In addition to federal, state and local requirements concerning environmental controls (EPA and OSHA), the supply base providers shall conform to the following Buyer requirements and needs:

Supply base providers shall ensure that all new and existing manufacturing operations and equipment that emit pollutants into the environment during the manufacturing of Buyer's products are permitted in accordance with state and local regulations. Supply base providers shall be in compliance with the conditions of their permit at all times.

Water is a primary ingredient in all products manufactured by Buyer. Supply base providers shall ensure that a supply of running water that complies with the Federal Drinking Water Standards be provided in all areas for processing products, for cleaning rooms, equipment and utensils, for packaging materials and for employees' sanitary facilities.

Supply base providers of packaging materials shall comply with Section 18 of this Manual concerning Notification of Recycled Material Usage.

Supply base providers of ingredients, packaging materials and supplies shall make arrangements to provide ingredients, supplies and packaging materials for these items that are recyclable, reusable or returnable to the supply base providers.

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9. Environmental Controls *continued*

Requirements *continued*

Bulk deliveries of ingredients or supplies are preferable where proper storage and delivery facilities can be provided. When arrangements are made, the supply base providers may provide such storage and delivery equipment. Bulk storage tanks provided by the supply base providers shall be above ground and furnished with the proper containment and monitoring equipment as may be required by federal, state or local regulations.

Materials, ingredients and supplies that cannot be shipped in bulk quantities shall be shipped in the largest quantity possible, as agreed between the Buyer and the supply base providers. For liquids, the following hierarchy of container shall be utilized:

- Totes are preferable to drums
- Drums are preferable to pails

For powders and dry materials, the hierarchy is:

- Super sacks are preferable to bags
- Bags are preferable to boxes or drums

Supply base providers shall make every effort to provide recyclable or returnable containers, and shall have procedures in place to accept and/or recycle used packaging materials. These procedures could include, but not be limited to, railcars, trailers, compactors and crushers where arrangements can be made.

No material or packaging shall contain materials that will produce a hazard in their use or disposal, unless this is a normal characteristic of the material provided and its hazard specifically addressed in the Purchase Order and/or item specification. Any hazardous materials generated shall be disposed of in accordance with applicable federal, state and local regulations.

A Material Safety Data Sheet (MSDS) shall be provided to the appropriate purchasing and environmental personnel at the time of delivery of the material. It is the supply base provider's responsibility to ensure that the MSDSs provided are current, and accurate.

(Also refer to Notification of Recycled Material Usage, Section No. 18.)

10. Environmental Auditor Access Policy

Supply base providers of ingredients, products, packaging, processing materials and equipment for Buyer shall permit Buyer's Environmental Auditing Representatives access to facilities used to manufacture, pack or store such products, packaging materials, processing material, equipment or ingredients.

Requirements

Buyer's Environmental Auditing Representatives shall be authorized to enter and audit/inspect at reasonable times any establishments that manufacture, pack or store such products, packaging materials or ingredients for Buyer.

The audit/inspection may include a review of records, processes, controls and facilities to ensure that the supplier base provider is operating in accordance with appropriate federal, state and local environmental regulations. The supply base providers shall assist the Buyer's Environmental Auditing Representatives by providing documentation to confirm compliance with the appropriate regulations.

Limitations

An audit/inspection shall not extend to financial data, sales data (other than those directly related to Buyer's), pricing data or personnel data (other than data as to qualifications of technical and professional personnel performing functions pertinent to the audit, or governmental requirements with respect to personnel practice).

Notification

It is Buyer's policy to give reasonable notice to conduct an audit/inspection. However, nothing in any contract or this Manual shall deny the right of Buyer to conduct unannounced audits by its own representatives, or through firms/agencies that conduct audits under contract. Upon arrival at the plant facility, environmental auditors/inspectors should be required to provide positive identification and/or other credentials to attest to their identity.

11. Customs Trade Partnership Against Terrorism (C-TPAT)

Buyer is a participant in the United States Customs - Trade Partnership Against Terrorism (C-TPAT). Information regarding C-TPAT is available at www.customs.gov/xp/cgov/import/commercial_enforcement/ctpat. You are encouraged to participate in C-TPAT or equivalent security programs.



Campbell's

Campbell Soup Company
Campbell Place
Camden, NJ 08103

(856) 342-4800
www.campbellsoup.com

Issue 8 Effective January 2010