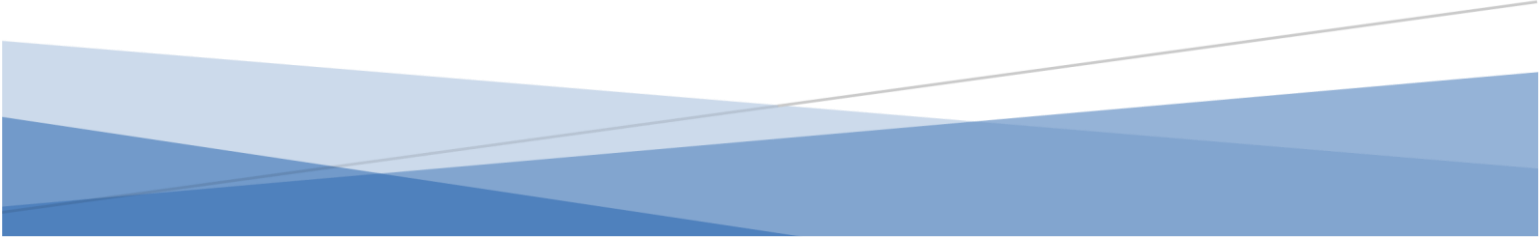


GENERAL MILLS GLOBAL WAREHOUSE MANUAL

FSQ – Supply Chain

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Joletta Knight
Jolettaknight@genmills.com
Eric Dy
EricDy@genmills.com



General Mills (GMI) Global Warehouse Quality Manual

Table of Contents

OVERVIEW	2
Policy 01: Product Regulatory Compliance	2
Policy 02: Product Control Traceability Recall / Withdrawal	3
Policy 03: GMPs & Sanitation Programs	7
Standard 3.1 – Personal Practices & Hygiene	7
Standard 3.2 – Operational and Storage Practices	7
Standard 3.3: Facilities and Utilities	9
Standard 3.4: Equipment	10
Standard 3.5: Sanitation	10
Standard 3.6: Facility Integrated Pest Management	11
Standard 3.8: Chemicals	14
Policy 4: Transportation, Shipping and Receiving of Raw Materials and Finished Products	14
Policy 06: Product Identity & Labeling	20
Standard 6.1: Product Labeling and Control	20
Standard 6.2; Audit Readiness for Organic Claims	20
Policy 07: HACCP	21
Policy 08: Food Allergen	21
Standard 8.2: Food Allergen Control Procedures	21
Policy 11: Agriculture Pesticide Use and Raw Grain	22
Policy 12: Product Donation	23
Policy 13: Control of Physical Hazards and Foreign Material	23
Standard 14.2: External Warehousing	24
Policy 15: Food Defense	24
NAR Addendum.....	25
Policy 02: Product Control Traceability Recall / Withdrawal	26
Standard 4.2: Receiving	29
Policy 4.3: Shipping	30
Cold Chain Addendum: Objective and Scope Cold	32
Definitions	32
Temperature requirement.....	32
Receiving	32
Storage	33

Shipping.....	33
Outside of temperature tolerance	33
Facility	33
Monitor Device	33
Best Practice of Temperature Warehouse Mapping	34
Reference	34

OVERVIEW

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

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

NOTE: All NAR Warehouse locations must submit a 3rd party audit effective May 1, 2023. See attached document for full program.



NAR%20Warehouse
%20Food%20Safety%

Policy 01: Product Regulatory Compliance

- Warehouse facility shall have a Regulatory Contacts program. The documented procedures should be reviewed annually and should include the following elements:
 - Person or persons named (by position) to accompany all inspectors
 - Defined company/facility policy on the use of photographic and recording equipment
 - Defined company/facility policy regarding records and samples
 - Training plan to assure personnel stay current on procedures. (individual training should be documented)
 - Procedures for reporting and documenting regulatory contacts
 - Procedures for developing, documenting, and verifying corrective actions
- The facility shall be in compliance with international, federal, state, and/or local registration and licensing requirements.
- The facility shall have programs in place to ensure compliance with import/export regulations for the country of manufacture and the country of sale.
- Warehouses storing product that will be consumed in the USA shall register with the FDA and then re-register every even numbered year.

5. Facility shall communicate to GMI whenever a regulatory agency (or international equivalent) contact is made. Regulatory agencies in the United States could include (but not be limited to) FDA, USDA, applicable State Departments of Agriculture, State public health authorities, local public health authorities, State or Federal Department(s) of Labor (OSHA), EPA (or state equivalents). Contact, as defined, could include a telephone call, letter, or an on-site visitation.
6. The facility shall complete the GMI Regulatory Contact Report (attached) and e-mail it to their GMI contact and/or Regulatory.Contact@genmills.com within 24hrs (if there were observations requiring action) or 72hrs (if no observations or no action required).

Note: if the warehouse is contracted/owned by a copacker to store GMI owned material (rather than contracted by GMI), then the copacker should be contacted if there is regulatory contact at the warehouse. In turn, the copacker will contact GM if General Mills product is impacted.

7. If General Mills samples are pulled by a Regulatory authority, product should be held and reported to General Mills Quality for further instructions.
8. All NAR locations, and countries that ship to NAR, must file with the FDA and obtain a FDA registration number.



Procedure%201.1.1%
20Regulatory%20Cor

Policy 02: Product Control Traceability Recall / Withdrawal

External Supply chain manufacturing locations that contract directly with warehouses to store General Mills owned material shall ensure that these warehouses have effective hold management program, and a communication plan is in place in the event of a hold.

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

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

3. Ship and receipt documentation must be retained per corporate retention requirements (seven years).

4. All General Mills products and containers shall be clearly identified with a legible and accurate item number and code date representing at a minimum: day, month, year, and packaging plant.
5. Warehouses repacking product shall have a documented code date program that is traceable and meets General Mills requirements, local laws, and local regulations.
6. For some regions, there may be one code date program that applies to several facilities or countries within the same region. In this case, the program shall list the following:
 - Which facilities or countries the program applies to.
 - The code date program shall include requirements for: Code date accuracy, format and interpretation, legibility of code, and font size; Code date system for when the day changes within a shipping container or pallet cube.
 - Audit procedures to complete code date audits on a regular frequency as set by the Facility quality Manager.
 - The audits shall be performed at the point of packaging and shall confirm that the code date meets requirements.
7. “Special Pack” are products that are reconfigured for short-term promotions. The final special pack products are items such as display pallets, display shippers, or pallets with multiple items on it.
 - Specific code date requirements are provided in the “special pack specification” issued by the GMI Special Pack group.
 - Site Special Pack Coordinators are responsible for these requirements. GMI Special Pack Group works with the Special Pack Site to set up the processes.
 - Facility Manager or designate at the location of Special Pack production shall maintain appropriate documentation to efficiently determine by code date and production code date all components used in every production code date of assembled product to insure traceability.
 - The Customer Service Facility shall have a two-character alphabetical plant code assigned by Minneapolis FSQ to use as a plant code designation. (NAR ONLY)
8. The receiving location shall be responsible for reconciling received products by item code, code date and quantity with the shipping records and pallet identification for every load. This information shall be retained at the receiving locations and will be used for inventory, product withdrawal and product recall purposes.
9. When missing or illegible material numbers or code dates on the shipping container or consumer unit are encountered by the receiving location, General Mills Warehouse Quality Manager or the On-Site Quality Manager at the shipping facility shall be contacted with a request for disposition.
10. A missing, incorrect, or unscannable pallet identification tag shall be replaced with a pallet identification tag that has the same material code and code date and plant information as the shipping container and consumer units to maintain traceability.
11. All General Mills products suspected or found not to be in compliance with General Mills requirements shall be immediately placed on “Hold” and kept under control until final disposition is given by General Mills. General Mills should be notified immediately.
12. General Mills Quality shall be accountable for determining the quantity of product to hold. The quantity held should ensure no substandard product will reach the customer.
13. There shall be a process to monitor hold product and escalate to enable timely dispositions.

Procedures for Hold, Control, and Disposition of Suspect or Confirmed Substandard Product

14. Facilities shall have current and documented procedures for hold, control, and disposition of substandard product specific to their facility.
- (a) At a minimum, facility specific procedures shall include:
 - Procedures when substandard product is first suspected.
 - Hold control procedures including methods for visual identification and movement control.
 - Documentation procedures
 - Verification procedures
 - Disposition procedures
 - Communication procedures within the facility and to others in GMI
 - Loss of hold control procedures
 - (b) Facility FSQ Manager or designate shall ensure facility procedures for hold, control, and disposition of substandard product are current.

Hold control methods:

15. **Hazardous Holds:** All hazardous hold product shall have visual identification and movement controls as follows:

1) Visual Identification Control:

- Each unit of hazardous hold product as configured for shipping (e.g., pallet, bulk tote, super sack) shall be identified as hazardous in a manner that visually differentiates each unit on all four sides from other product.
- The facility shall have a consistent visual identification method used at the facility. The method of visual identification shall be documented in the local facility procedures.
- See Table 1 for types of visual identification control methods.

2) Movement Control:

- Each unit of hazardous hold product as configured for shipping (e.g., pallet, bulk tote, super sack) shall have at least two movement controls applied.
- The types of movement controls used for hazardous holds at the facility shall be documented in the local facility procedures.
- See Table 1 for types of movement control methods.

16. **Non-hazardous holds:**

1) Movement Control:

- Each unit of non-hazardous hold product as configured for shipping (e.g., pallet, bulk tote, super sack) shall have at least one movement control applied.
- The types of movement controls used for non-hazardous holds at the facility shall be documented in the local facility procedures.
- See Table 1 for types of movement control methods.

Table 1: Types of Hold Controls

Visual Identification Control Methods (for hazardous holds)	<ul style="list-style-type: none"> ● Distinctive labeling on all four sides of each hold unit ● Caution tape around each hold unit ● Colored stretch wrap around each hold unit ● Other method that visually differentiates <u>each</u> hold unit on all four sides from other product.
Movement Control Methods (For hazardous and non-hazardous holds)	<ul style="list-style-type: none"> ● Electronically blocking movement of the product in the site’s inventory management system (electronically secured) ● Storing the product in an area that is separated, segregated, or isolated from non-hold or non-hazardous hold product (physically secured/locked) ● Locking the area (e.g., room, trailer) where the hazardous hold product is stored (physically isolated/segregated) ● Other method that restricts movement and is documented in local procedure

17. If hold product is not unitized for shipping (e.g., material or product is in bulk bin or bulk vehicle), the Facility FSQ Manager or designate (for GMI locations) or GMI ESC FSQ Manager (for ESC locations) shall determine the appropriate controls to apply to ensure the product is not used.
18. Hold product quantities shall have documented physical verification on a set frequency by material identification number and code date to ensure information in the hold documentation matches the actual inventory.
 - (a) **Hazardous hold:** Verification shall occur on a weekly basis.
 - (b) **Non-hazardous hold:** Verification frequency shall be determined by Facility FSQ Manager or designate with frequency documented in local procedures. NOTE: Non-hazardous hold products are typically verified monthly.
19. The physical location of product on hold shall not compromise the integrity of adjacent products in the holding location.
20. Hold controls shall remain in effect until disposition instructions are issued and disposition is complete. NOTE: Refer Disposition to section below.
21. If there is **loss of control*** of hold product, the following shall occur:
 - For warehouse locations, the GMI FSQ Manager and the shipping location shall also be notified.
 - (a) Location of the product shall be determined.
 - (b) Facility FSQ shall conduct a risk assessment to determine further actions.
 - (c) Corrections and/or corrective actions shall be documented.
 - *** Loss of Hold Control:**
 - Product that was intended to be on hold, was not on hold, and then was used or shipped.
 - Product that was on hold and was used or shipped prior to official documented disposition.
22. GMI FSQ shall be involved in rejections and returns of finished product due to suspected or confirmed food safety, quality, or regulatory issues as indicated in the following requirements. The FSQ personnel involved varies depending on the specific circumstances.

For example, GMI Corporate FSQ, GMI FSQ Regulatory Manager, GMI FSQ Product Manager, GMI FSQ Regional Leader, GMI Facility FSQ Manager, GMI ESC FSQ Manager and/or designates may be involved.
23. GMI FSQ shall complete the following for rejections and returns due to suspected/confirmed food safety, quality, or regulatory issue:
 - Determine if inspection of the product and/or shipping vehicle is necessary and If inspection is needed, determine who is authorized to inspect product and/or the shipping vehicle.
 - Approve product returns requiring temperature control (i.e., refrigerated, or frozen products)
 - Determine if further actions and/or communications are necessary related to food safety/quality/regulatory aspects of the product.
 - Determine if product hold is needed.
 - Determine disposition actions.
 - Identify any corrective actions needed.

Policy 03: GMPs & Sanitation Programs

Standard 3.1 – Personal Practices & Hygiene

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

Standard 3.2 – Operational and Storage Practices

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

8. Products/materials shall be stored off the floor on clean surfaces at all times (i.e. on a slipsheet, rack, or pallet).
9. Raw agricultural products (e.g. grain, fruit, vegetables) should be handled to prevent contamination prior to further processing.
10. Products/materials shall be stored under good conditions, and protected from environmental sources of contamination from ceilings, ducts, overhead structures, and adjacent operations.
11. Products/materials are stored away from open windows and doors, unit heaters, vents, stairways, refrigeration units, and motors to help maintain product integrity.
12. Products/materials shall be stored with sufficient space (minimum 12" or 25 cm) between the product/material and walls to allow for sanitation, inspection and pest control activities to be carried out.
13. There shall be adequate space between rows of stored product/material to prevent product/material damage, and enable detection of damage and/or spillage.
14. When required by the product or material specification, environmental storage requirements such as temperature and humidity shall be maintained, monitored and documented. General temperature storage requirements are listed below.
15. Products/materials shall not be stored directly adjacent to materials which could cause potential contamination or odor transfer.

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

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

SEE COLD CHAIN ADDENDUM

Standard 3.3: Facilities and Utilities

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

Standard 3.4: Equipment

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

Standard 3.5: Sanitation

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

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

Standard 3.6: Facility Integrated Pest Management

1. The company running the warehouses shall develop, implement, document and maintain an effective integrated pest management (IPM) program that includes:
 - Pesticide usage and control
 - Rodent control
 - Insect control
 - Bird control
 - Wildlife control
 - Sanitation, maintenance and facility audit/inspection and monitoring

NOTE: Hiring an external pest control company does NOT meet all the requirements of an integrated pest management program.

2. Routine audits of the IPM program should be completed by the designated individual and an annual audit shall be completed.
3. A designated point person shall be in place at each WH to oversee the IPM program. This individual will be responsible for the following:
 - Ensure that an effective sanitation process is in place to prevent pest issues.
 - Work with Warehouse maintenance to identify damaged doors that do not close properly or have gaps that could allow pests to enter.
 - Review the weekly report and speak with the pest control operator
 - Follow up on corrective actions or gaps that have been identified by the pest control operator
 - Walk with the pest control operator two times annually, during a service visit, to verify the program is working and identify any gaps
 - Read and understand the current contract and services that are provided.
4. A documented annual assessment must be on file to show a full inspection of the facility and identify any gaps. This assessment can be a foundation for planning repairs, changes to the current contract or improvements to the overall integrated pest management program.
5. A Pest Sighting Log should be in place at the WH. This log will allow any pest activity that is found or noted by individuals at the WH to document the activity and the pests. This will be available to the pest control operator and discussed on a weekly basis.
6. All employees working in the warehouse have initial (upon hire) and annual training on how to identify pest activity, and how to report pest activity once identified.
7. Ensure that product/material in the warehouse is kept 12"-18" away from the exterior walls – to allow pest control operator to check traps along the wall.

8. Verify the Pest Control logbook is accurate and all invoices, pesticide treatments and service reports are up to date.
9. Verify the landscaping and Warehouse grounds are maintained in a way to prevent pest harborage.
10. General Mills shall receive communication if there is an infestation in the warehouse where General Mills owned material is stored.
11. All documents that are part of the integrated pest management program shall be provided to General Mills upon request.

PEST CONTROL PROVIDER

1. Hiring external pest control service is not required, if trained, qualified people work for the warehouse they may provide the pest control service as part of the warehouse Integrated pest management program that meets General Mills requirements.
2. The pest control provider shall have a thorough integrated pest management program that will include the following:
 - An initial facility assessment to determine what pests (rodent, bird, insect, wildlife) are highest risk and should be covered by the Pest Control Contract. Rodents (mice/rats) shall be covered and typically insects as well.
 - The pest control provider shall have a Pest Control Logbook on site at the warehouse, and shall contain the following:
 - Signed contract/agreement – noting frequency of services provided.
 - Facility Maps indicating where pest traps are located.
 - Signed Service Reports (including traps checked, findings and pest conducive conditions throughout the warehouse)
 - Certificate of Insurance & License (to all applicable local/state/country laws)
 - Approved Pesticide list
 - Pesticide usage log to include:
 - EPA Registration number
 - Pesticide name
 - Date and Time of application
 - Lot Number
 - Quantity used.
 - Rate of application
 - Target Pest
 - Initials of applicator/operator
 - Past pest trend analysis reports
 - Service reports for special service (fogging, fumigations, etc.)
 - Annual documented assessment of the program
 - Phone numbers for contacts in the event of added services needed.
 - Insect Light Trap activity and annual bulb change date.
 - Documented findings of anything conducive to pest activity:
 - Webbing found.
 - Gaps in Doors
 - Findings, gnawing or catches in exterior bait stations or interior traps.
 - Building gaps or deficiencies to include floors.
 - Sanitation gaps
 - Bird nesting

- Pest control operator shall elevate concerns to his/her supervisor and higher-level authority in the warehouse or to General Mills if the findings (noted by the pest control operator) are not addressed in a timely fashion or if there is a repeating offense.
 - The Supervisor of the pest control company will do an annual inspection of the program at the warehouse and evaluate how the pest control operator is managing the contract.
 - Pest control provider will include a monthly inspection of the facility to identify any gaps that need to be addressed by the warehouse. This should be part of one of the scheduled visits and will include all areas of the warehouse, offices, cafeterias/break rooms, restrooms, pallet inventory and any other locations deemed at risk by the pest control operator.
 - Insect light traps will be in place to capture and identify flying insects. Insect light trap program will include:
 - **Minimum of Monthly inspections and counts of insects during flying insect season.**
 - Glue board replacement
 - Bulbs will be shattering proof or coated to contain any breakage of bulbs.
 - Labeled with location and identifying number.
 - Bulbs will be changed out annually, and the date of the bulb change documented in the pest logbook.
3. If stored pests are a concern (given the type of product stored at the warehouse), the pest control provider shall include a stored pests program (typically Drug Store Beetles, Cigarette Beetles, Indian Meal Moth, Red Flour Beetles, Confused Flour Beetles, Saw-toothed Grain Beetle, and Warehouse Beetles). The program shall include the following:
 - Inspect the facility to determine pest species, locate breeding sites, and look for other signs of Stored Product Pest activity and conditions which may indicate an Infestation.
 - Establish a pheromone monitoring program (with set frequency) to help identify activity early and location of activity. All traps will be dated when checked and the bar code reports will note trap conditions at the time of service.
 - Provide recommendations on structural and sanitation practices that can be improved to minimize stored product pest activity.
 - Provide targeted product applications during regular service visits for stored product pests in key areas of concerns.
 4. Interior rodent traps to be numbered and checked weekly:
 - Bar code shall be inside the mechanical rodent traps so the pest control operator will have to open the trap to check for mice and scan the bar code to confirm that the trap has been checked.
 - The mouse entrance into these traps should be free of debris and in working order.
 - Placement of interior traps and distance between rodent traps shall be determined based on history and risk level. (Note: Examples of higher risk areas include trailer/rail dock doors, personnel doors, idle equipment storage areas, and areas under construction.)
 5. Toxic rodenticide bait shall not be used in traps inside the facility. Attractant may be used in traps within the warehouse but must not pose a risk of allergen contamination. Trap types include wind-up traps, snap traps, glue boards, etc.
 6. Exterior rodent bait stations shall be numbered and checked/refreshed monthly unless covered by snow. They should be kept locked and secured, free of debris and the date bait refreshed should be recorded in bait station. The bar code shall be inside the bait stations so the pest control operator will have to open the bait stations to check for rodents/bait consumption and scan the bar code to confirm that the trap has been checked.
 7. Pest control provider shall provide an escalation plan to address increasing pest activity in/around the warehouse.
 8. All pesticides used at a location must be on the GMI approved list. For a current copy of the Approved Pesticide List contact your GMI FSQ Designate.

Standard 3.8: Chemicals

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

Policy 4: Transportation, Shipping and Receiving of Raw Materials and Finished Products

1. The party responsible for contracting the transportation of GMI products/materials shall communicate GMI requirements for transportation, shipping, and receiving. The responsible party may be a GMI department, GMI facility, raw material supplier, ESC location, warehouse, customer, or other entity.
2. Locations shipping and/or receiving GMI products/materials shall have facility specific documented procedures that meet the requirements in this standard.
3. All security seals shall meet the following:
 - (a) Have a unique identification number
 - (b) Be tamper evident
 - (c) The style and strength of the tamper evident seal used shall be based on applicable laws and regulations with additional consideration of load type, time in transit, route conditions, materials of transport, plant location, or country.

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- (d) For security seals for ingredient and packaging material shipments: Refer to the GMI Ingredient Supplier Manual GMI and GMI Packaging Material Supplier Manual.
 - (e) If a security seal is missing, broken, or tampered with or security seal documentation is not accurate, then refer to [Vehicle Security Seal Risk Assessment](#).
 - (f) Refer to specific section on Imports and cross-border shipments for requirements on security seals for these types of shipments.
4. Prior to loading, the shipping location shall complete a documented inspection of the transportation vehicle/container for conditions described in requirement 4.1.3.
 5. The following shall be met for GMI products/materials being loaded for shipment:
 - (a) Transportation vehicles/containers shall be loaded by personnel authorized by the facility management. The personnel loading cannot be a carrier employee or vehicle driver.
 - (b) Only clean and undamaged products/materials shall be loaded.
 - (c) GMI products/materials shall not be shipped with other food or non-food materials where contamination could occur.
 - (d) Under no circumstances shall hazardous non-food materials be shipped with GMI products/materials.
 - (e) Slipsheets, liners, pallets, or other barriers shall be used to prevent damage and/or contamination to the products/materials during transportation.
 - (f) Where used, pallets shall be in compliance with applicable laws and regulations of the receiving country.
NOTE: Most countries require compliance to ISPM 15 standards of heat treated or fumigated pallets.
 6. Every shipment of GMI products/materials shall have accurate shipping documentation relevant to food safety, regulatory, and traceability as required by GMI, applicable laws and regulations, and industry standards. The facility shall ensure the shipping documentation matches the product loaded. This includes but is not limited to:
 - (a) Transportation vehicle/container company name
 - (b) Vehicle/container identification number
 - (c) Name and addresses of origin and destination points
 - (d) Shipment identification number (for example, GMI shipment number, GMI delivery number, GMI vendor or customer purchase order number and/or other unique identification number for the shipment)
 - (e) Ship date
 - (f) Security seal numbers for each security seal attached to the vehicle/container (NOTE: Requirements for vehicles not requiring security seals are described in LTL section)
 - (g) Load description
 - For ingredients/packaging materials: Include name of material and/or material identification number
 - For finished products: Include name of material and GMI material identification number
 - (h) Lot or code date of the product/material
 - (i) Quantity of each lot or code date and material number
 - (j) Other information as required by applicable laws and regulations
 7. The Facility FSQ Manager or designate at the shipping location shall be notified of and determine actions for any suspected or confirmed issue related to the transportation vehicle/container, security seal, products/materials or shipping documentation that may impact food safety, quality, integrity, or regulatory compliance.
 8. Shipping documentation shall be retained by the shipping facility.
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9. The following shall be completed by personnel authorized by the facility management. The personnel cannot be a carrier employee or vehicle driver.
- (a) Transportation vehicle/container shall be inspected and documented for vehicle/container conditions.
 - (b) All security seals shall be inspected to ensure they are intact and there is no evidence of damage or tampering. The inspection shall be documented.
 - (c) All security seals with numbers on the shipping documentation shall be verified that the actual seal number matches the number on the shipping documentation. This includes seals that were not removed but are on the shipping documentation. The verification shall be documented.
 - (d) The vehicle/container identification, contents of the vehicle/container including quantities, code date and material numbers, and any specified shipping requirements shall be verified to match the shipping documentation. The verification shall be documented.
 - (e) For finished product on pallets, the code date and material number on the pallet label is verified to match the code date and material number on the product shipping container (e.g case).
 - (f) Products/materials shall be inspected for any issues that may impact food safety, quality, or integrity of the products/materials. This includes but is not limited to evidence of damage, pest activity, excessive moisture, foreign material. The inspection shall be documented.
 - (g) Incoming shipping documentation shall be reviewed for completeness and accuracy.
10. Unloading of shipments shall meet the following:
2. Products/materials shall be unloaded in a manner that does not impact the safety, quality, or integrity of the products/materials.
 3. Personnel authorized by the facility management shall perform or witness the unloading of products/materials. If the person performing the unloading is a carrier employee or vehicle driver, then the unloading must be witnessed by personnel authorized by the facility management.
11. Receipt of shipments shall be documented and include
- (a) Date received
 - (b) Shipping location
 - (c) Vehicle/container number
 - (d) Material number, code date/lot code, and quantity of materials received.
 - (e) Other shipment information required for specific type of vehicle/container or product/material.
12. The Facility FSQ Manager or designate at the receiving location shall be notified of and determine actions for any suspected or confirmed issue related to the transportation vehicle/container, security seal, products/materials or shipping documentation that may impact food safety, quality, integrity, or regulatory compliance of the load.
- (a) Suspected or confirmed issues may include but are not limited to.
 - Vehicle/container conditions do not meet requirements of this standard
 - Security seals are missing, open, tampered with, or do not match shipping documentation
 - Products/materials have signs of damage, tampering, or contamination.
 - Products/materials were not shipped according to specification (for example, temperature)
 - Products/materials received do not match shipping documentation (for example, quantities, code date, lot code or material number)
 - Shipping documentation is inaccurate or incomplete
 - Driver, shipper, or carrier cannot provide documentation upon request.
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(b) For suspected or confirmed issues, the Facility FSQ Manager or designate shall determine the following.

- If the vehicle/container and/or products/materials should be accepted or rejected
- If products/materials unloaded need to be segregated and/or placed on hold
- If further actions or risk assessments are needed
- If communications with other GMI departments, shipper, carrier, or supplier are needed.

(c) Issues with the shipment shall be documented.

13. The receiving location shall retain all documentation associated with shipments.

14. **Temperature Controlled Vehicles/Containers** shall meet the following requirements:

- The carrier shall ensure the following:
 1. The vehicle maintains specified temperatures during transit.
 2. Temperature control devices are calibrated.
 3. Temperature and calibration records are available upon request.
- **Shipping:**
 1. The shipping location shall ensure products/materials requiring temperature control are shipped according to temperature parameters as defined in the product/material specification. NOTE: Shipments may require temperature control for every shipment or only during certain climates/seasons or in certain regions.
 2. The shipping location shall not release the vehicle until temperatures as specified in the product/material specification have been met and verified. This may include verifying vehicle temperature set points, verifying internal vehicle temperature, verifying product temperature, and/or reviewing vehicle temperature device data.
 3. The shipping documentation shall include temperature requirements for the shipment and results of temperature verification prior to shipment.
- **Receiving:**
 1. Prior to unloading, the receiving location shall verify the temperatures as specified on the shipping documentation and/or in product/material specification. This may include verifying vehicle temperature set points, verifying internal vehicle temperature, verifying product temperature, and/or reviewing vehicle temperature device data. The verification shall be documented.

15. **Receiving Fumigated Railcars:** The receiving location shall:

- a. Have procedures for fumigant handling and aeration.
- b. Ensure fumigated vehicles/containers are handled by authorized and trained personnel in a manner consistent with the fumigant label, fumigation rules and regulations, and any other applicable legal considerations.
- c. Prior to unloading a fumigated vehicle/container, ensure the following occurs:
- d. Visually inspect top of the load.
- e. Protect contents while aerating fumigated vehicle/container.
- f. Account for and remove all fumigant materials and warning placards.
- g. Handle fumigant materials according to the fumigation manufacturer's recommendations, company requirements, and all applicable laws and regulations, including immediate removal of spent fumigant materials to secured and properly ventilated storage site.

16. Less than Truck Load/Multi-Stop shipments are defined as

- a. LTL shipments are transportation of products/materials that does not require a full load. These smaller loads typically include multiple products/materials transported on one truck with multiple delivery stops.
- b. LTL shipments may include non-GMI products/materials.
- c. LTL shipments do not include bulk tanker trucks or railcars.
- d. Stops for regulatory agency inspections are not included in definition of ‘multi-stop’.

17. The following requirements apply to Less than Truck Load (LTL) and/or Multi-Stop Shipments:

- GMI products/materials shipped as an LTL shipment or multi-stop shipment shall not be shipped with other products/materials that could compromise the safety, quality, and integrity of the GMI products/materials.
- Security seals or other methods to secure the contents are not required for LTL shipments with more than one delivery stop, however, they are recommended.
- If vehicle has security seals, padlocks, or other method of securing the contents, then they shall be inspected for evidence of damage and tampering. The inspection shall be documented. If security seals are used, then additional requirements in the General Receiving section for verifying security seals shall be met.
- If there is no method of security, then a documented visual inspection of vehicle and contents shall still be performed as described in General Receiving section.
- If LTL shipment is in a vehicle (e.g., delivery van) that does not allow fork truck to unload, then the receiving facility shall have documented procedures to allow for the vehicle driver to bring the material to the facility receiving area.

18. Food grade ingredients classified as hazardous chemicals (health hazards, physical hazards and environmental hazards) shall meet the following:

- (a) Shall be shipped according to GMI specification requirements and applicable laws and regulations and shall have adequate containment and protection.
- (b) Proper documentation, such as Safety Data Sheet (SDS), shall accompany the load as required by applicable laws and regulations.

NOTE: This does not pertain to ingredients or products classified as “hazardous” due to foreign material or food safety reasons.

19. Imports, exports and cross-border shipments shall meet the following:

- a. Shall meet applicable laws and regulations.
- b. Shall meet GMI Global Trade requirements outlined in Global Trade policy and standards.
- c. Samples taken by regulatory agency at border shall meet protocol in GMI Food Safety & Regulatory Matters Standard 1.2 Regulatory Sampling section on “Border Samples”.
- d. ISO PAS 17712 compliant security seals shall be used for all imports to the U.S.
- e. The exporting country shall ensure the seal used is in compliance with the importing country’s seal requirements.
- f. If a shipment does not have a security seal or the security seal does not match the shipping documentation, then shipping documentation shall not be changed without complete chain of custody documentation. This includes:
 1. If the security seal is removed at customs, the carrier shall notify GMI and shall document the new security seal information on the shipping documentation.

20. If the shipment is enroute and the seal integrity is compromised, then the carrier shall notify GMI for direction on how to proceed. If GMI determines the vehicle can be resealed, then a new seal shall be applied with the seal numbers documented on the shipping documentation.

21. **Empty transportation containers** stored on-site at a facility shall have the doors closed. Seals and/or padlocks are not required.

22. **Shuttles:**

Shuttles are defined as a method for direct transport of product/material to/from a manufacturing location on a regular route to/from a designated nearby storage location. Shuttles are provided by a designated company and usually for locations that do not have ample on-site storage for product/material. This definition of shuttles does not include (1) vehicles or containers with product/material that are idle in a lot or yard, (2) interstate commerce shipments, (3) shipments to customers, and (4) raw material shipments from suppliers.

The following requirements apply to shuttles:

- Shuttles shall have a method to secure the contents.
 - The method shall be determined by the Facility FSQ Manager or designate.
 - The method may include a security seal, padlock, or other method to secure the contents and protect from tampering.
 - The security method (seal, padlock, or other) shall be applied by personnel authorized by facility management.
- If sealing of the shuttle vehicle/container does not meet the security seal requirement for regular shipments (requirement 4.1.7 and 4.1.8), then facilities shall have a documented risk assessment and associated procedure for shuttles. The risk assessment and procedure shall be approved by the Facility FSQ Manager or designate and shall include:
 - what locations and routes are in scope of the shuttle
 - what type of security measures are used?
 - who is authorized to apply security measures?
 - what company is authorized to provide the shuttle service.

Policy 06: Product Identity & Labeling

Standard 6.1: Product Labeling and Control

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

Standard 6.2; Audit Readiness for Organic Claims

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

Organic Integrity Requirements –

4. MAINTAIN PACKAGE INTEGRITY:
 - Finished packages or containers may not be opened
 - Original lot codes of the products may not be altered
 - Repackaging (often referred to as special pack – not exposing food but repacking individual containers into a new outer case) is allowed for organic product but will require organic certification if the new packaging contains organic statements/symbols.
5. PREVENT COMMINGLING:
 - Organic and non-organic finished products and ingredients may not be mixed**
 - Standard warehousing operations sufficiently meet this requirement. Organic packaged and sealed products and ingredients that remain packaged and sealed in storage are not in danger of violating the commingling prohibition.
6. PREVENT CONTACT WITH PROHIBITED SUBSTANCES:
 - Contamination may not occur from exposure to pest management or cleaning materials
 - Impermeable Packaging: Please be advised that ingredients and product packed in impermeable packaging such as bottles and cans are excluded from contamination concerns. Cartons and corrugate are NOT considered impermeable.
 - Permeable Packaging: If pesticide fogging, pesticide sprays, or prohibited cleaning supplies are applied to areas where organic ingredients or product is stored and packaging may be permeated by the pesticides, the organic products must be removed prior to the application or protected with impermeable coverings. The required aeration time prior to the return or uncovering of organic product and materials is three

times the treatment's directed aeration time. For example, a directed aeration time of 8 hours would mean a minimum 24 hours period of protection.

- Food-contact packaging inventory: Any inventory of food-contact packaging must also be protected from contamination, similar to any food ingredient.
- Documentation of pesticide program and procedures must be maintained
- Demonstrable Proof Standard: All pesticide treatments and product movement or covering must be documented in such a manner as to provide demonstrable proof that organic ingredient and product integrity has been maintained. Records must note type and time of treatment, time and location of product movement or covering, places of off-site storage, treatment's recommended post-application aeration time, and time of return to warehouse – keeping in mind the 3X rule noted above.

Policy 07: HACCP

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

Policy 08: Food Allergen

Standard 8.2: Food Allergen Control Procedures

1. Personnel (including permanent employees and temporary employees) involved with product storage and distribution of human and pet food products shall have an awareness of the presence of human food allergens in pet food products and their associated risks to humans. This includes awareness of human food allergens present in ingredients, products, storage areas, production areas, and employee areas such as locker room, lunchrooms, and vending machines. Training shall be documented.
2. Warehouses that **only store General Mills packaged products** shall conduct a documented annual assessment to determine which allergen control procedures are necessary at their location to protect against the unintended presence of an allergen.

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

Policy 11: Agriculture Pesticide Use and Raw Grain

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

4. General Mills grain streams shall be sampled and examined for evidence of insect infestation, rodent excreta, shally or sour odors, molds and fungi, temperature and moisture content. Sampling frequency shall be determined and adjusted based on monitoring results. If any objectionable conditions are noted upon examination of General Mills grain, General Mills shall be notified and appropriate action shall commence promptly.

Policy 12: Product Donation

1. General Mills will determine status of donations. Under no circumstance can product be donated without GMI consent.
2. General Mills donated products shall be safe for human and pet consumption and use.
3. General Mills donated products shall comply with the receiving location's applicable laws and regulations for product donations.
4. General Mills products approved for donation shall only be donated to GMI approved organizations.
5. General Mills product donations shall include label information, be traceable, and be handled in a manner that ensures product safety.

Policy 13: Control of Physical Hazards and Foreign Material

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

Standard 14.2: External Warehousing

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

Policy 15: Food Defense

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

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

REVISION LOG FOR GLOBAL WH MANUAL

DATE	REVISED BY	NOTES/CHANGE
5.18.2023	Joletta Knight	Full review and updates: Added Cold Chain Addendum (Daniel Wu), updates to Policy 2 and Policy 4. Grammer check.
9.27.2023	Joletta knight	Policy 2.7 – Please add (NAR ONLY) Policy 3.6 in the PEST CONTROL PROVIDER SECTION – Minor change for the Insect Light traps from weekly to Monthly. - Minimum of Monthly inspections and counts of insects during flying insect season. Policy 4 Section – the numbering had jumped from 3 – 9. Fixed the numbering sequencing so if you can fix it in your translated documents that would be great.

NAR Addendum

The following requirements are per General Mills Logistics Product Safety Team (GMI LPS) – For USA/Canada warehouses using SAP. Pet warehouses are currently out of scope for this Addendum.

Policy 02: Product Control Traceability Recall / Withdrawal

1. Traceability programs at each facility shall be challenged through a traceability test/mock recall at a minimum of once per year.
2. Mock recall shall test one step back from the facility (i.e. origin of inbound material) and one step forward from the facility (i.e. destination of outbound material). All mock recalls shall be documented including:
 - Identification of item traced (i.e. ingredient, finished product)
 - Time for completion
 - % of raw materials recovered
 - % of finished product recovered
 - Key learnings, gaps, discrepancies, corrective actions, and system improvements needed to meet target criteria of (a) 4 hours or less (b) 100% recovery of material.
3. NOTE: Documentation essential for traceability may include Receiving Records, Pallet Identification, Shipping records, Ship receipt discrepancy/reconciliation, Hold Orders & Disposition, Special Pack, Donation, Destroy, Dump.
4. Ship/receipt documentation must be retained per corporate retention requirements (seven years).
5. General Mills reconciliations (product trace) associated with Market Action (Recalls and Withdrawals) shall be executed, per General Mills request, within 99-102% of production and completed within 24 hours. Any warehouse owned gaps shall be resolved in a timely manner.
6. General Mills organic trace audits shall be executed, per General Mills request, within 99-100% of production and completed within 24 hours. Any site owned gaps shall be resolved in a timely manner.
7. No semi or finished product inventory shall be managed outside the General Mills' SAP system and the local inventory management system of the site.
8. A process shall exist to ensure warehouse inventory management system (WMS) and General Mills SAP inventory are reconciled.
9. For batch managed materials (where the inventory system captures the material and the code date) reconciliation shall occur at the code date or lot level.
10. In addition to daily inventory reconciliation between the local inventory management system and the General Mills SAP system, storage locations shall conduct a physical cycle count every 90 days.
11. The cycle counting process shall include the physical verification of material code, code date, and quantity across each storage location. Any discrepancies between the physical count, the location inventory management system and the General Mills SAP system shall be investigated and resolved within one business day.
12. Master data (such as dimensions, weights, green light flag where applicable) impacting inventory accuracy and control shall be identified and maintained by a site process owner. The master data in the location inventory system must match up with the General Mills SAP system.

13. A Business Continuation Plan (BCP) shall exist to ensure that inventory control and traceability is maintained during system outages and evaluated annually.
14. For warehouses repackaging or re-stickering product, procedures shall exist to deliver materials to the repackaging/re-stickering area in a timely and accurate manner that supports the Bill of Materials (BOM) and production sequence. There shall be visual control to ensure the right amount of product is staged for consumption and that consumption accuracy against the BOM is maintained.
15. The quantity shipped of each material and code date shall be recorded on the shipping facility's loading order or warehouse management system report for all product shipping from a facility on behalf of General Mills, including interplant and customer shipments. Full product codes shall be noted on the shipping documents.
16. One code date for each pallet shall be identified on the shipping record when loading a full pallet.
17. Mixed pallets shall contain a placard for EACH code date contained in the pallet. The placard shall contain the item number, code date and quantity. A method shall exist for accurately tracking mixed code date pallets. For quantities less than full pallet, the number of shipping units retrieved from the pick areas shall be noted for each code date shown for recall reporting documentation.
18. Code date pallets shall use the standard GMI Mixed Pallet Placard and contain one license plate number (LPN) for each code date.
19. Procedures shall exist for rework and recoup to ensure lot integrity is maintained and recorded in warehouse inventory management system and the General Mills SAP inventory management system.
20. Age management procedures (re-warehousing, storage location code date window, etc.) shall exist to support customer shippable shelf-life requirements and to minimize write-offs associated with aged product.
21. Procedures shall exist for refeed and rework processes to ensure proper lot control and recording practices. Code date integrity shall be maintained between the consumable unit and the inner/outer packaging, case, and pallet.

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

FINISHED GOODS & SEMI-FINISHED GOODS:

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

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

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

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

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

Information required on BOL after truck is loaded and sealed:

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

Information required on BOL after load has been received.

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

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

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

RAIL CAR / INTERMODEL SHIPMENTS:

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

NOTE: Retention period for BOL documentation is seven years.

1. **Per General Mills Logistics Product Safety Team (GMI LPS) – For USA/Canada warehouses using SAP** - Mock hazardous holds shall be conducted a minimum of 1/yr unannounced (best practice is quarterly) by each facility

to assess the facility's ability to contain hold product accurately and in a timely manner. Additional work may be needed if poor results. Any failure requires a retest.

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

Standard 4.2: Receiving

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

Data Element	Description	GMI SAP Reporting Timeliness
<i>Production</i>	<i>Receipt from production</i>	<i>2 hours</i>
<i>Interplant Receipt</i>	<i>Receipt from site internal to GMI</i>	<i>2 hours</i>
<i>Receipt from vendor PO</i>	<i>Receipt of vendor purchase order</i>	<i>2 hours</i>

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

Policy 4.3: Shipping

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

REVISION LOG for NAR ADDEDUM:

DATE	REVISED BY	NOTES/CHANGE
5.18.2023	Jolletta Knight	No changes – grammer check

General Mills (GMI) Cold Chain Addendum

Table of Contents

Objective and Scope 32

Definitions 32

Temperature requirement..... 32

Receiving 32

Storage 33

Shipping..... 33

Outside of temperature tolerance 33

Facility 33

Monitor Device 33

Best Practice of Temperature Warehouse Mapping 34

Reference 34

Objective and Scope

- The propose of this document is to maintain the quality and safety for all the frozen, chilled products and ingredients of General Mills. This document not only covered the temperature requirement of receiving, storage, and transportation, but also the requirement for storage facility and monitor device.

Definitions

- Storage Temperature: The standard temperature requirement for storage.
- Loading/Receiving Area Temperature: The standard temperature requirement for receiving and loading.
- Transportation Temperature: The standard temperature requirement for transportation (Included shipping, truck, or other transporting method).

Temperature requirement

- Temperature requirement for GMI products/ingredients (Please refer to table 1).

Product/Requirement	Storage Temperature ^b (Target/ Maximum)	Loading/Receiving Area Temperature	Transportation Temperature ^b (Target/ Maximum)
Haagen Dazs	≤-26°C / ≤-23°C ≤-15°F / ≤-9.4°F	≤10°C ^a ≤50°F ^a	≤-26°C / ≤-23°C ^c ≤-9.4°F / ≤-0.4°F
Frozen Product/Ingredient (Including Pet) (Depends on product characteristic and local regularity)	≤-18°C ≤-0.4°F	≤10°C ^a ≤50°F ^a	≤-18°C / ≤-15°C ≤-0.4°F / ≤5°F
Refrigerated Non RTE Product/Ingredient (Depends on product characteristic and local regularity)	0~10°C 32~50°F	≤10°C ^a ≤50°F ^a	0~10°C 32~50°F
Refrigerated RTE (Including Pet) (Depends on product characteristic and local regularity)	0.5~5°C 32.9~41°F	≤10°C ^a ≤50°F ^a	0.5~5°C / 7.2°C 32.9~41°F / 44.96°F
Air-Conditioned Storage	10~20°C, humidity≤65 % 50~68°F, humidity≤65 %	NA	10~20°C 50~68°F

^a Besides Haagen Dazs, the loading/receiving area temperature of other categories are recommendation, according to the local weather, local regularity, and product characteristic, you can decide whether the temperature need to be controlled or not.

^b If storage and transportation temperature have special requirement, please follow the finish product specification.

^c for HD, transport from WH to retail outlets, the requirement is maximum temperature ≤-18°C in the end of route.

Receiving

- If needed, you can have a procedure for product maximum remain time on the Loading/Receiving Area

- The temperature of shipment/truck shall be checked and recorded, if needed the product temperature should be checked.
- Visual inspection of the product shall be performed to ensure product integrity.
- For Haagen Dazs shipment products, the data in data logger shall be downloaded from Sensitech website first, then use Crystal tool to identify whether can be received or not.

Storage

- The storage temperature shall follow the requirement in table 1.
- The temperature of the environment shall be controlled and recorded by the temperature-recording device.
- The storage place needs to establish a procedure to avoid frost buildup.

Shipping

- The shipping and transportation temperature shall follow the requirement in table 1.
- Before loading, the products should be inspected for its integrity, and we suggest the truck should be pre-cooled and make sure the temperature achieves the standard, the standard temperature recommendation is in Table 2.
- The truck shall have a temperature-recording device to monitor the temperature during transportation.

Table 2. Pre-cooled recommendation	
Product	Recommendation
Haagen Dazs	0°C 32°F
Frozen Product/Ingredient (Including Pet) (Depends on product characteristic and local regularity)	0°C 32°F
Refrigerated Non RTE Product/Ingredient (Depends on product characteristic and local regularity)	1~5°C 33.8~41°F
Refrigerated RTE (Including Pet) (Depends on product characteristic and local regularity)	1~5°C 33.8~41°F

Outside of temperature tolerance

- When the temperature does not reach the standard during storage, receiving and shipping, the corrective action shall be taking immediately to reduce the risk of the products, this includes Warm Load Procedure and Cold Action Load Procedure.
- For Haggen Dazs product, please see the procedure below.
 - a) Use crystal tool to check whether it can be released or not, more detail please refer to “Guideline to aid release/reject decisions” document.
 - b) If the products already are special release products, the crystal tool result may not be accurately, please do the visual inspect or discuss with local PM.
 - c) Haagen Dazs shop and kitchen can follow ESP procedure.

Facility

- The temperature within the warehouse, loading area, and storage freezer must be regularly monitored and recorded.
- The system shall fit with an alarm system to prevent temperature abuse.
- The device shall be equipped with a temperature-recording device, covering a minimum of seven days, which should be checked at least every 24hrs, and the record should be kept for at least two years.
- Hot spot/cold spot mapping recommend being established. The sensor for the alarm should be in a “hot spot.” (Please refer to Best Practice of Temperature Warehouse Mapping)

Monitor Device

- The temperature monitoring interval shall not exceed 30 minutes.

- Facility shall identify monitoring device to calibrate annually by external agency. Where calibration is not possible, accurate device shall be installed.
- The high temperature alarm must be calibrated and documented annually.
- Record of calibration and verification shall be maintained.
- Facility monitoring device shall be protected.
 - a) From damage
 - b) From being unauthorized adjusted
- If the data logger, temperature-recording device did not work or missing, please follow the sampling plan and do the product inspection and discuss with local PM to see if it can be released.

Best Practice of Temperature Warehouse Mapping

- Note: when consider the storage area as a cube, the location of the sensor shall be installed at the Corner, the space in the middle, at the center of each side of the cube (figure 1) (“5 rules of sensor...”, 2014). This case considers the heat-exchange in each area to ensure the worst-case of temperature flocculation. For large space, cube mapping can be done for storage area only. The “stack of three” method can be done for sensor placement on the vertical plane in the large area (figure 2).

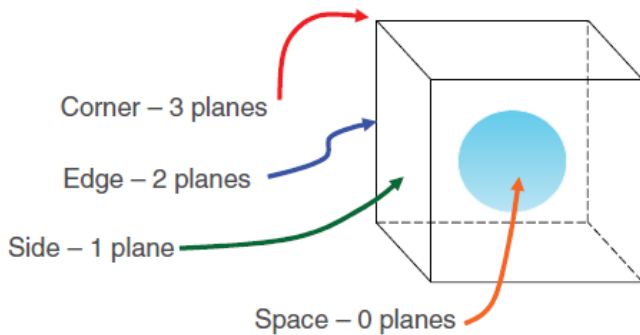


Figure 1: Part of cube

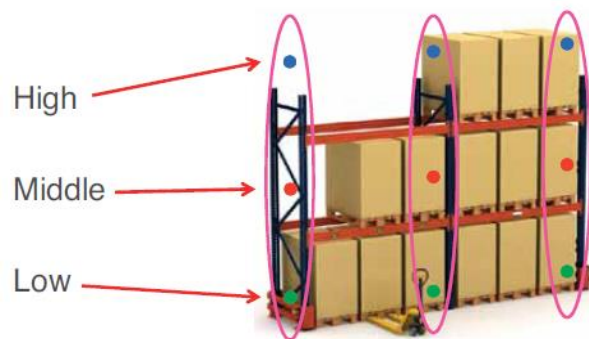


Figure 2: The illustration of “the stack of three” method

Temperature mapping shall consider common variables of the potential heat source including:

- a) Volume/surface area
- b) Temperature differential
- c) Height
- d) Exterior wall
- e) Door and window
- f) Lighting
- g) Air-circulation/HVAC

Reference

- a) 5 Rules of Sensor Placement in Validation/Mapping Applications



5 Rules of Sensor Placement in valid

- b) Guideline to aid release/reject decisions.



GUIDELINE TO AID DECISION M/

- c) Crystal Tool



REVISION LOG for Cold Chain Addendum:

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5.3.2023	Daniel Wu	New Cold Chain Addendum