



Supplier Food Safety & Quality Systems Manual

*“Quality is never an accident;
It is always the result of high intention,
Sincere effort,
Intelligent direction and skillful execution;
It represents the wise choice of many alternatives.”*

– William A. Foster

ConAgra Foods Supplier Food Safety & Quality Systems Manual

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INTRODUCTION

ConAgra Foods views suppliers, co-manufacturers and other quality partners as an extension of our company. We respect our supply chain network and strive for the development of a relationship that continually improves the quality our consumers require. Consumers are the driving force behind our every move and the source of our continued growth. They help define our quality expectations in terms of food safety and product excellence. These expectations are a minimum set of quality programs that when implemented will serve as a solid foundation for your quality system. We count on our suppliers to embrace these programs and implement a culture that continually pursues quality levels well above these minimum standards.

ConAgra Foods does not outline how to setup or operate a supplier's facility to meet the requirements in this manual. However, we will establish specifications, process operating guidelines and procedures to guide the supplier with the specific requirements about the component supplied or product manufactured. These documents will ensure the supplier has a set of clearly defined food safety and quality expectations.

ConAgra Foods looks forward to building a quality relationship with its supply base. Any questions about ConAgra Foods or these expectations can be sent to: supplier.quality@conagrafoods.com. We will provide assistance and guidance on these expectations as requested. Also, ConAgra Foods will always accept comments and best practices you wish to share with us.

ADMINISTRATION

Suppliers, Co-Manufacturers and other Quality Partners for ConAgra Foods, here within referred to as suppliers, shall have a documented Quality System (QS) designed to manage product safety and quality. In addition to meeting all regulatory requirements, ConAgra Foods expects Supplier's QS criteria, at a minimum address: Food Supply Chain Security, GMPs-SSOP-HACCP, Allergen & Sensitive Ingredient Control, Pest Control, Foreign Material Prevention, Receiving & Inventory Management, Product & Process Evaluation, Product Traceability & Mock Recalls, Packaging & Labeling, Storage & Shipping, Analytic Records and Laboratory Support, Employee Training, etc.

International Compliance Information Exchange (iCiX) ConAgra Foods has chosen to use International Compliance Information Exchange (iCiX) to automate and manage supplier documentation. We feel that participating through iCiX will be beneficial to both ConAgra Foods and our suppliers by providing a two-way process of communicating and exchanging quality systems documentation in a secure, rapid and readily accessible method. In addition, ConAgra Foods is using iCiX's Supplier Nonconformance and Corrective Action Response System (CARs) to communicate quality and service issues and resolutions in a real time basis.

Food Safety / GMP Audits. ConAgra Foods relies on regular third party audits conducted by industry recognized companies to verify that the supplier's food safety/GMP programs are designed and functioning to regulatory and industry standards. Suppliers shall post their third party audit results, complete with documented corrective actions, on supplier's iCiX site, with ConAgra Foods given appropriate reader rights. Co-Manufacturers of ConAgra Foods finished products are required to undergo a ConAgra Foods food safety audit. Documented corrective actions must be completed in a timely manner.

EXPECTATIONS

Food Supply Chain Security. ConAgra Foods is a Tier III validated company in the Customs-Trade Partnership Against Terrorism (C-TPAT) Program. C-TPAT is a partnership program sponsored by the Customs and Border Patrol (CBP) which encourages all companies involved in food supply chains, as well as their business partners, to voluntarily comply with established security standards and industry best practices. ConAgra Foods realizes many benefits resulting from our Tier III status, the highest awarded by CBP. It is imperative that our suppliers and other business partners comply with C-TPAT security standards for the company to maintain our program status.

Facility's Food Security program and supporting documentation shall be a part of the facility's Third Party Food Safety/GMP Audit.

Current Good Manufacturing Practice in Manufacturing, Packing, or Holding Human Food (commonly called GMPs). United States Code of Federal Regulations (CFR) Section 21, Part 110. Suppliers shall have documented GMP programs that control conditions to protect and maintain food safety and quality, these shall include: personnel training, product and material receiving, handling, storage and delivery; personnel hygiene and hygienic practices; facility and equipment condition; and facility structure and grounds.

Facility's GMP Programs and supporting documentation shall be an integral part of the facility's Third Party Food Safety/GMP Audit.

Allergen and Sensitive Ingredients. Suppliers shall complete an iCiX product page for each ingredient/product supplied, indicating allergens and sensitive ingredients that are present in their facility's products or operation. ConAgra Foods requires that the iCiX product reader permission shall be granted to all of ConAgra Foods iCiX sites.

Suppliers shall develop and maintain an allergen and sensitive ingredient control program. The program shall direct the facility in assessing where allergens and sensitive ingredients are received, stored, handled and it shall also identify potential avenues for cross-contamination (including, but not limited to: rework, trimming, reprocessing, and equipment cross-contact).

Facility's Allergen and Sensitive Ingredient program and supporting documentation shall be an integral part of the facility's Third Party Food Safety/GMP Audit. ConAgra Foods will review Supplier's iCiX site for compliance with product page requirements.

Pest Control Program. A supplier's facility shall have a documented pest control program which is designed to prevent pest activity within the facility and its surrounding area. The program shall include supporting documentation indicating trap and bait station locations along with chemical usage and storage. Licensed Pest Control Operator (PCO) or trained employees shall document each inspection – complete with pest activity; deficiencies shall be addressed with corrective action documentation.

Facility's Pest Control program and supporting documentation shall be an integral part of the facility's Third Party Food Safety/GMP Audit.

Foreign Material Prevention Program. Facility shall have a program that is designed to prevent the introduction of foreign material. ConAgra Foods requires that its supplier's product

shall be scanned through a calibrated metal detector or similar device. The facility shall have a program describing the maintenance, set-up, verification and frequency of testing the foreign material device. Documentation of foreign material detector rejects, root cause and corrective action for the rejection shall be maintained. The facility shall have a procedure for disposition of product that has suspect or known contamination.

The facility shall have a documented Glass/Brittle Plastic Control program that identifies equipment or other areas containing glass and clear hard plastic. This program shall restrict the use of glass/brittle plastic devices and supplies. The facility's procedure should state the guidelines for prevention of contamination and the disposition of suspect or known product that contains glass/brittle plastic. Facilities packing product in glass shall be equipped to properly clean the containers and provide shielding to protect product and ingredients in the event of glass/brittle plastic breakage during production.

Facility's Foreign Material Prevention program, Foreign Material Detection program and Glass / Brittle Plastic Control program complete with supporting documentation shall be a part of the facility's Third Party Food Safety/GMP Audit.

Sanitation Standard Operating Procedures (Commonly called SSOPs). Suppliers of food components and packaging materials intended for food contact shall have a documented SSOP program that shall ensure the cleanliness of the food handling equipment and facility. Facility's SSOP shall include: Documented standard cleaning methods for individual pieces of equipment, utensils and facility structures; Pre-op and operational monitoring complete with corrective action documentation; Verification of cleaning effectiveness (e.g.: bioluminescence monitoring or swabbing of food contact surfaces at end of cleaning cycle - prior to sanitizing); Tool & Maintenance (preventative and unscheduled) sanitation; Cleaner & Sanitizer chemical control; and Employee hygiene.

Facility's Sanitation Standard Operating Procedure programs and supporting documentation shall be an integral part of the facility's Third Party Food Safety/GMP Audit.

Hazard Analysis and Critical Control Point (HACCP). Facility shall have a HACCP system to identify and control hazards associated with the product and process. A HACCP team, which shall be lead by a trained individual, shall be charged with developing, monitoring, and (minimum of once a year) reviewing and validating the HACCP plan. Critical limits for each Critical Control Point (CCP) shall be monitored to assure adequacy. Prerequisite programs and corrective action procedures, along with monitoring of corrective actions taken, shall be established to support the HACCP/equivalent system.

Facility's HACCP or HACCP-based program, complete with supporting documentation shall be an integral part of the facility's Third Party Food Safety/GMP Audit.

Receiving & Inventory Management. Suppliers shall have a documented supplier approval program which includes food safety evaluations of their suppliers manufacturing and warehouse sites.

Facility shall have a documented incoming material program. Ingredient and packaging items shall be inspected to assure that they are clean and suitable for processing into food and have been handled in a manner to protect against contamination and minimize deterioration. Facility's

incoming material program shall include process steps to prevent use of ingredients before approval and to assure that non-conforming materials are not used.

Facility should have a Supplier Noncompliance Program in place to communicate and track noncompliance issues with their suppliers. This program should require corrective action responses from identified supplier addressing these issues. ConAgra Foods Enterprise Quality and/or Procurement may request inclusion in this program for facilities Co-Manufacturing for ConAgra Foods.

A facility's inventory management program shall assure that stored materials (ingredients – including bulk ingredients and packaging) do not become a source of contamination.

Facility's receiving and inventory management programs and supporting documentation shall be an integral part of the facility's Third Party Food Safety/GMP audit.

Process and Product Evaluation. Supplier shall operate under a documented process control program. Statistical Process Control programs shall be used to evaluate process, with documented measurements indicating the level of performance. Responses and corrective actions should be made on both trend and major deviations from the control limits

Facility shall have a documented calibration (certification) program to evaluate the performance of operational measuring devices. Program shall include documentation of corrective actions when a non-calibrated or inaccurate measuring device has been used. Aseptic, Cold Fill, Hot Fill and Thermal Processing operations shall function under a Processing Authority, validated by supporting documentation. Ready to Eat (RTE) operations shall meet or exceed ConAgra Foods procedure for Verification and Control of *Listeria* in RTE foods.

Co-manufacturers of ConAgra Foods shall perform and document product cuttings/evaluations on a regular and frequent basis.

Facility's Process and Product Evaluation programs and supporting documentation shall be an integral part of the facility's Third Party Foods Safety/GMP Audit. ConAgra Foods will evaluate Suppliers process and products on a regular basis. ConAgra Foods reserves the right to include site visits as a part of our evaluation, with the goal of continuous improvement.

Packaging & Labeling. Supplier shall have a documented label control program, which assures that labels (finished product and component materials) comply with regulatory requirements. Facility's label control program shall address: receiving labels (reviewed against regulatory approvals, where applicable, and internal product specifications); storage and use of labels (prevention of mixing labeling stock, disposal of obsolete labels); and assuring the label being used matches the product being produced.

Supplier shall have a documented net weight, liquid content, or product count program which verifies compliance to label requirements and specifications. Facility shall maintain documentation of testing to assure proper weight, count or quantity and testing methods used.

Supplier shall have a documented program that assures the product packages and the shipping containers are properly closed, sealed and provide the necessary protection for the product from environmental and shipping conditions. Documentation of testing to assure proper closure should be maintained, complete with descriptions of test methods and specifications.

Suppliers of ingredients and packaging materials may use their own internal lot code or code date system. Date of Manufacture shall be determined from this lot or code date. An interpretation of this lot code or code date shall be posted on supplier's iCiX site. ConAgra Foods requires that the iCiX document reader permission shall be granted to all of ConAgra Foods iCiX sites.

Co-Manufacturers of individual retail or foodservice sell units shall use a lot code and code date in the required ConAgra Foods format on individual packages and shipping cases.

Facility's Label and Packaging Programs and supporting documentation shall be a part of the facility's Third Party Food Safety/GMP Audit. ConAgra Foods shall validate Suppliers compliance with iCiX posting of Lot Date/Code explanation document.

Storage & Shipping. Facility shall have a documented program describing acceptable and unacceptable shipping container conditions, with inspection results documented. Facility shall have documented product shipping program to ensure that product is not released for shipping prior to validating conformation to regulatory and specification requirements. Program shall require proper stock rotation (product to be shipped by first expiration date). Facility's program shall include the handling of returned products.

Facility's Storage & Shipping Programs and supporting documentation shall be a part of the facility's Third Party Food Safety/GMP Audit.

Product Traceability & Mock Recalls. Facility shall have a product traceability program, complete with 24/7 emergency contact information, capable to effectively trace specific lots of ingredients (including bulk ingredients), packaging and finished products through shipping and distribution channels. Facility's 24/7 emergency contact information shall be posted on their iCiX site. Facility shall have the ability to trace ingredients or component product-in-process, carryover product and rework. Product traceability program shall also be able to trace finished products back to received ingredient lots. Mock recalls shall be regularly conducted (minimum of once a year) to validate traceability program. Documented summaries shall be prepared for each mock recall describing the recall process and the results, with corrective actions addressing any discovered deficiencies.

Facility's Product Traceability Program, Mock Recalls and supporting documentation shall be an integral part of the facility's Third Party Food Safety/GMP Audit. ConAgra Foods shall validate Facility's compliance with iCiX posting of 24/7 Emergency Contact information.

Analytical Records and Laboratory Support. Supplier shall have a documented program that addresses how records and reports of analytical information gathered by the facility (including the use of outside laboratories), documented, and retained. Program shall document laboratory testing methods based on recognized and approved methods and procedures (AOAC, APHA, BAM, USDA...). Program shall be verified by documented evidence that the results of the laboratory are accurate and reliable (check sample programs) and include calibration of instruments and measuring devices.

Facility's Analytical Records and Laboratory Support Programs and supporting documentation shall be a part of the facility's Third Party Food Safety/GMP Audit.

Guarantees & Warranties

Reduction of Toxics in Packaging. Packaging and packaging components sold to ConAgra Foods Inc. or its subsidiaries, suppliers, or co-packers, comply with the requirements of this law, namely that the sum of the incidental concentration levels of lead, mercury, cadmium, and hexavalent chromium present in any package or packaging components shall not exceed the 100 Parts Per Million by weight. In cases where the regulated metals are present below the 100 Parts Per Million, the regulated metals are not intentionally added during the manufacturing process. Furthermore no material used to replace the regulated metals are present in a quantity or manner that creates a hazard as great as or greater than the hazard created by the regulated materials. Packaging suppliers shall obtain the same written assurances from their suppliers.

Packaging Material Supplier's submission and posting of this document serves as a warranty that certifies ConAgra Foods that your company is in compliance with the reduction of toxics in packaging and that supporting documentation will be maintained throughout the lifespan of the packaging or packaging component.

Public Health Security and Bioterrorism Preparedness and Response Act of 2002 Public Law 107-188, June 12, 2002 (commonly known as 'Bioterrorism Act of 2002'). Suppliers of materials and products to and within the United States shall comply with all requirements of the Public Health Security and Bioterrorism Preparedness and Response Act of 2002. Record keeping requirements of the Act require that facilities maintain records relating to one up shipments and one back receipts for a period of 3 years.

Suppliers submission and posting of this document serves as a warranty that assures ConAgra Foods that your company is registered with the FDA or USDA and is in compliance with the Public Health Security and Bioterrorism Preparedness and Response Act of 2002.

Bovine Spongiform Encephalopathy (BSE) Risk Minimization. Bovine Spongiform Encephalopathy (commonly called "Mad Cow Disease") has afflicted cattle in a number of countries around the world, including the United States & Canada. Since the verification of this disease in North America several steps have been implemented to minimize human exposure to materials that scientific studies have demonstrated as containing the BSE agent in cattle infected with the disease.

Supplier's submission and posting of this document serves as a warranty that assures ConAgra Foods that your company's beef and cattle suppliers are complying with current USDA FSIS notices and associated BSE controlling regulations. This includes, but is not limited to, regulations addressing: ruminant feed restrictions; animal identification systems; high risk cattle population surveillance; non-ambulatory disabled cattle; stunning; specified risk materials (SRMs); mechanical meat separation processes; and import controls.

California's Safe Drinking Water and Toxic Enforcement Act of 1986 Health and Safety Code Section 25249.5 et seq, commonly known as 'Proposition 65'. Suppliers of materials and products to ConAgra Foods that contains a chemical listed by the State of California pursuant to Proposition 65, which is not exempt from the warning requirement under Section 25249.10, shall agree to advise ConAgra Foods in writing of the following: the product name, the listed chemical involved; and the warning statement that you are providing with the product.

Supplier's submission and posting of this document serves as a warranty that assures ConAgra Foods that your company will comply with California's Safe Drinking Water and Toxic Enforcement Act of 1986.

REFERENCE PAGE / INFORMATION LINKS

For a complete list of supplier required documentation, please see our Supplier Requirements (Ingredient, Packaging and Co-Manufacturing suppliers) located under Compliance Documents on the ConAgra Foods Corporate iCiX site.

Due to the need-to-continually-update nature of computer links, ConAgra Foods has set up information links on a Reference page located on our corporate iCiX site (under compliance documents) to house the links <http://www.icix.com/link.asp?docId=115633>.

If you have a reference or information link you wish to share with us, please send it to www.supplier.quality@conagrafoods.com and we will add it to our reference page.

SIGN-OFF

Supplier's submission and posting of this document on their iCiX site serves as an Acknowledgement and Receipt of Intent to Comply with the Requirements of the ConAgra Foods Supplier Food Safety & Quality Systems Manual and the Guarantees & Warranties implied within.