SUPPLY BASE REQUIRMENTS AND EXPECTATIONS MANUAL

SUPPLY BASE REQUIREMENTS AND EXPECTATIONS MANUAL

Table of Contents

INTRODUCTION

A primary objective of the Arnott's Biscuits Limited ("Arnott's" or "ABL"), its affiliates, and subsidiaries is to market safe products of consistent quality that meet or exceed our customer and consumer expectations. To accomplish this, it is important that our brokers, co-manufacturers/co-packers, re-packers, special packers, suppliers, warehouses, distributors, and licensees (here in referred to as supply base providers) share the same objectives.

Arnott's is committed to positively contributing to building and sustaining a socially responsible workplace. We recognize that Arnott's supply base providers play a critical role in helping Arnott's execute our mission in an ethical and responsible manner.

The requirements detailed on the following pages are designed to help our current and potential supply base providers meet these objectives. These requirements have been developed through reviews of quality audits of manufacturing sites, other major food company programs, and a study of product retrievals throughout the food industry. Our examination has led us to identify which programs, when executed well, can help prevent product retrievals and consumer complaints. Arnott's considers adherence and performance to these expectations as essential factors when entering or extending existing business relationships.

It is your responsibility, as an Arnott's supply base provider to meet or exceed these threshold requirements, in order to ensure that the products produced for Arnott's and its subsidiaries are safe and meet or exceed our quality standards. If you have any questions about these standards, please contact your Arnott's Contract or Quality Representative. All references to Arnott's, its products and representatives for the purpose of this manual, shall include all Arnott's divisions and subsidiaries, including, without limitation, Arnott's Indonesia and Campbell Australasia Pty. Ltd.

We stress that these are minimum requirements. They are not intended to alter or eliminate any requirements that may be set forth in any contracts or product specifications issued by any Arnott's division or subsidiary. As a condition of doing business with Arnott's, you acknowledge that these requirements become part of our purchasing contracts, including purchase orders.

Some requirements cover issues that routinely change. Regulatory authorities continually review and adjust the legal status or limits for ingredients and primary packaging; the scientific community may present new product safety information; or Arnott's may desire changes in food safety and quality programs to better ensure the safety and quality of our products. You are expected to comply with current regulatory requirements and any changes.

Not all these requirements may apply to every supply base provider. We do provide for exceptions which can be based on the uniqueness of a material, product, or process. If you feel an exception is needed for your plant(s), please contact your Arnott's Contract or Quality Representative to discuss.

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

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

Supply Base Providers - Definition:

- Broker/Trader – An agent who negotiates and contracts the purchase of equipment, ingredients, materials, packaging or services that are used in the manufacture of Arnott's products. Brokers/traders shall be accountable to and always ensure that the supply base providers they represent comply with Arnott's Biscuits Limited SQRM requirements. Brokers/traders might also have direct responsibilities for Food Safety and Quality under certain regulations.
- Co-Manufacturer/Co-packer – An outside manufacturer who uses ingredients and packaging materials and converts them into a finished product.
- Depot – A location which stores only branded finished products for direct store delivery.
- Distributor – A third party who is granted authorization to distribute products to retailers.
- External Product Development (PD) Site – A location which produces and/or tests sample products for or under the direction of Arnott's. An external product development site may be a co-manufacturer, supplier, contract product development company, or other location with or without a federally registered/inspected pilot production facility.
- Licensee – A third party who is granted authorization to co-brand, manufacture, distribute, and/or market a product using any of Arnott's brand names.
- Re-Packer – An outside manufacturer who takes "parent" or "work in process" (WIP) product produced either internally or at another external location and packs the products into a primary packaging (shelf ready) format. There is direct product exposure to the environment.
- Special Packer – An outside manufacturer who takes primary packages and converts them into different finished configurations (e.g. club items, pallet displays, promotional packs, etc.) or relabels
- finished product. There is no direct product exposure to the environment.
- Supplier – A provider of equipment, ingredients, materials, packaging, or services.
- Warehouse – A location which stores Arnott's ingredients, materials, packaging, or finished products.

Shall = must have

Should = strongly recommended

DEFINITIONS

TERM	DEFINITION
ABL	Arnott's Biscuits Limited, including Campbell Australasia.
Audit	An independent, documented process of assessing the extent to which policies, procedures and requirements are achieved by obtaining evidence and evaluating it objectively.
Bulk container outlets	All access points (discharge outlets, hatches, dip holes, sample points, etc.) to the interior of the tank/trailer/container.
Bulk food tank/trailer/container	A tank, trailer, or container used to transport food with its interior directly coming in contact with the food product.
Calibration	The process of comparing the measurement results from a piece of equipment against a known national or international standard/reference method.
CCP	Critical Control Point, step at which control can be applied and is essential to prevent or eliminate a food safety hazard or reduce it to an acceptable level.
Clean	Free from/removal of food, dirt, stain, and/or impurities.
Control Measure/Controls	An action that prevents, reduces or eliminates a food safety hazard.
Corrective action	Measure taken to eliminate or reduce a non-conformity.
Crisis	A non-typical scenario which threatens the safety of personnel, consumers or company reputation.
External Audit	Audit conducted by a GFSI recognised external body.
Food Defence	The process of ensuring food products are secure from all forms of intentional malicious attack.
Food Fraud	The deliberate and intentional act of food, raw material or packaging substitution, addition, tampering or misrepresentation or the use of fabricated or misleading statements about such products for economic gain.
Food Service Label	A label to be used on products intended for institutional distribution.
Food transport business	A company or party who provides food ingredient transportation services.
Food transport Vehicle	Any means of transporting food ingredients, whether self-propelled or not, and whether used on land, by sea, or in the air.
Genetically modified	An organism whose genetic material has been altered using genetic engineering techniques.
HACCP	Hazard Analysis and Critical Control Point.
Heavy metals	Silver, arsenic, barium, tin, antimony, selenium, lead, mercury, cadmium and hexavalent chromium.
Ingredient / Packaging Label	A label to be used on products intended for further processing.
Internal Audit	An audit conducted by, or on behalf of, the organisation itself.
Irradiation	A process of treating food and/or material to a specific dosage of radiation for a predefined length of time to slow or halt spoilage due to the growth of pathogens, delay ripening, increase yield, and/or improve re-hydration.
Nanotechnology	The manipulation of matter on an atomic and molecular scale.
Packaging Materials	All elements of packaging including adhesives, labels, inks, dyes and stabilizers and their components.
Post-Consumer Use	Product which has been in trade channels, used for its intended purpose and then placed into recycling channels.

Recycled materials	A post-consumer use material that has been treated, salvaged, refurbished or otherwise reworked for re-use.
Retail Product Label	A label to be used on products intended for retail distribution.
Sanitation	The implementation of hygienic principles for the purpose of food protection, food safety and employee welfare. It includes cleaning of equipment and structures for prevention of contamination from food residues, foreign materials, chemicals, biological, and microbiological contaminants.
Sanitation Performance Standard	A set of criteria that are established to define acceptable levels of sanitation for the intended result (i.e. visibly clean, allergen clean). They are the "standard" to be achieved for verification and validation.
Sanitation Standard Operating Procedure (SSOP)	A detailed, documented, visual system with a series of predefined process steps to ensure cleaning that meets sanitation performance standards. This is the document used for training and certification of an employee.
Sanitise	Reduction in the number of vegetative microorganisms; ability to reduce specific vegetative pathogens (i.e. *Staph* and *E.coli*) by 5 logs within 30 sec at ambient temperature (ATCC); performed after a thorough cleaning.
SBP	Supply Base Provider.
Supply Base Provider	{please refer to table on page 4}
Traceability	The ability to track any food product, raw material or product packaging through all stages of the supply chain.
Traceability exercise	A routine exercise that mimics a recall conducted to assess the effectiveness of supply base provider's recall procedures and responsiveness.
Validation	The process of collecting and evaluating data to determine whether the sanitation procedures, when properly implemented, will achieve the appropriate sanitation performance standard. Validation occurs only periodically.
Verification	Process of confirming that the validated Sanitation Standard Work is consistently meeting the requirements of the sanitation performance standard. Verification occurs routinely.
Product	Output of a supply base provider's process as supplied to Arnott's Biscuits Limited.
Material	Components used during a supply base provider's process to manufacture products i.e. Ingredients, packaging, etc.

1.0 - MANAGEMENT

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

Supply base providers shall have documented organizational structure that describes the responsibilities, authorities, and interactions of the people who manage, perform, and verify work related in any way to food safety and quality. These include, but are not limited to, managers, supervisors, coordinators, auditors, lab analysts, and operators.

Supply base providers shall provide the resources required to effectively establish, implement, maintain, and continually improve the food safety and quality management system.

Supply base providers shall have a documented food safety and quality management system in place to ensure compliance with this manual, all applicable regulatory requirements, and any and all Arnott's specifications, as well as any additional requirements issued from an Arnott's business unit. The system shall clearly define but not be limited to responsibilities, tasks, frequencies, corrective actions, and records.

Supply base providers shall have a management representative who is responsible for:

- Establishing, implementing, and maintaining a food safety and quality system, which assures the manufacture of safe and quality products.
- Reviewing and reporting the performance of the food safety and quality system to plant and senior management.

Notification of Change

Supply base providers shall have a documented system in place to manage changes in formulas, materials, specifications, processes, systems, equipment, management, and/or production facilities in order to avoid any impact on food safety and quality. The system shall include communication to Arnott's of changes that have a potential impact on food safety and/or quality and may adversely impact Arnott's. These changes may be subject to approval by Arnott's.

Crisis Management

Supply base providers shall have a team (should be multidisciplinary) in place to manage situations involving food safety, quality, and regulatory issues including plans to manage recall and retrieval activities. Roles and responsibilities, including decision making authority, shall be well defined and documented. In addition, supply base providers shall never initiate a recall of any Arnott's product without prior authorization from Arnott's

Business Continuity Plan

Supply base providers shall have a documented plan in place for the recovery from either a partial or complete interruption of critical functions due to an unforeseen event. The plan shall specify where manufacturing would take place if the facility became inoperative. Supply base providers shall ensure alternative facilities comply with the requirements and expectations as detailed in this manual or equivalent. This plan may be subject to approval by Arnott's.

Food Fraud

Supply base providers shall have a detailed process in place for effectively identifying and assessing the site's vulnerability to food fraud. The assessment shall include but not be limited to the risks of material and/or product substitution, mislabelling, dilution and counterfeiting which may adversely impact food safety. The vulnerability assessment shall be documented.
Supply base providers shall implement controls commensurate to the risks identified in the vulnerability assessment. Control methods, responsibilities and record keeping shall be documented in a fraud

mitigation plan. The food fraud vulnerability assessment and mitigation plan shall be reviewed at least annually.

2 – HACCP

A trained, multidisciplinary HACCP team shall be in place and responsible for but not limited to program/plan development, implementation, reviews/revision/reassessments, and employee training. All activities conducted by the team shall be documented.

The HACCP team shall develop, and verify for accuracy, a flow diagram of the unit operation or system. The flow diagram must be comprehensive enough to assure that all hazards are identified.

Each facility shall develop, implement, and maintain a documented HACCP Plan. The plan shall be in accordance with the following seven internationally recognized HACCP principles:

- Conduct a Hazard Analysis (Principle 1)
- Identification of Critical Control Points (Principle 2)
- Establishment of Critical Limits (Principle 3)
- Establishment of CCP Monitoring Procedures (Principle 4)
- Establishment of Corrective Actions (Principle 5)
- Establishment of Verification Procedures (Principle 6)
- Establishment of Documentation and Record-Keeping Activities (Principle 7)

HACCP plans shall include the following documentation:

- HACCP Approval Page
- HACCP Team Members
- History of Changes
- Facility Overview
- Process Flow Diagrams
- Hazard Analysis
- HACCP Master Plan
- Sample CCP Monitoring Records (blank copy)

Each facility shall maintain records related to the HACCP Plan and support documentation used in developing the plan (i.e., risk analyses, scientific articles cited, challenge studies), including all manufacturing records related to the HACCP activities, such as those resulting from CCP monitoring, verification, and when necessary, corrective action activities.

Prior to the release of product for distribution (or before product is out of the facility's control), all HACCP records (including electronic records, where applicable) shall be reviewed for compliance, signed, and dated by an individual who did not produce the records, and has been trained on HACCP principles and actions to be taken if critical/operating limits are not met.

All HACCP records shall be maintained for a minimum of 3 years plus current year, or for the product shelf life plus one year, whichever is longer.

The HACCP Team shall verify the effectiveness of the HACCP plan each time products, processes, or equipment change, new products are added to the plan, or, at a minimum, annually. HACCP Coordinators shall sign off on any new plans, and review changes to existing plans, at least annually.

HACCP References

- http://www.fao.org/fao-who-codexalimentarius/home/en/
- http://www.fao.org/fao-who-codexalimentarius/codex-texts/list-standards/en/
- World Health Organization
- https://www.who.int/foodsafety/areas_work/food-standard/en/

3.0 – GMP's / GLP's / GAP's

Good Manufacturing Practices

All plant personnel, visitors, maintenance, and outside contractors shall comply with Good Manufacturing Practice (GMP) requirements and all regulations in the locations where product is manufactured, stored, and distributed. Supply base providers shall establish and maintain documented GMP's to ensure products and materials are handled, stored, packed, and delivered under controlled conditions to maintain food safety and quality. Such requirements shall be effectively communicated, prominently posted within the facility, and continually monitored. The supply base provider GMP's shall effectively address, at minimum, the following requirements:

- Hand Washing: running water, apply soap, rub for 20 seconds, rinse with running water, and dry
- Fingernails: clean, short, and no polish, false, acrylic, decorated nails
- No jewellery, visible body piercings, or watches (exceptions: plain wedding/partner band and medical alert bracelet/wristband or necklace)
- Preventing personnel suffering from infectious diseases from entering the site
- Sores and cuts: cover with waterproof, blue coloured dressing (highly visible), and metal detectable
- Uniforms: clean, no button closures, no pockets above waist, and not sleeveless, fraying, or torn
- Gloves (if used): adequate product contamination controls; coloured (e.g. blue)
- Hairnets (in processing areas): single use; cover all hair and worn over the ears
- Beard Guards/Snoods/Masks (in processing areas): completely cover facial hair (if not clean shaven)
- Eating/Drinking: only in designated areas
- Smoking/Smokeless Tobacco Products: used only in designated areas and properly disposed
- No false eyelashes in the processing area
- No straight pins or safety pins in the processing areas
- No personal items in the processing areas with the exception of prescribed, site approved medication
- Chemicals (if used): clearly labelled, identified, properly stored, and access effectively controlled
- Equipment/tools/utensils/containers/etc.: used, identified, and stored in a manner to prevent cross-contamination
- Food containers/packaging materials (trays/bins/cans/jars/etc.): not used to store non-food items
- Daily Housekeeping: conducted to prevent product contamination

Supply base providers shall have a documented preventative maintenance program for all equipment used in manufacturing and logistics related processes. Supply base provider shall have documented procedures in place to ensure maintenance work and temporary repairs do not become a source of contamination. The procedure shall include but not be limited to tools/parts reconciliation, use and storage of food grade lubricants/greases/coolants, and equipment commissioning/re-commissioning.

Good Laboratory Practices

Supply base provider internal laboratories and third party laboratories contracted by the supply base provider who perform testing on ingredients, packaging, and/or finished products used and/or produced for Arnott's shall comply with Good Laboratory Practice (GLP) requirements and all regulations in the locations where product is manufactured, stored, and distributed. The laboratories shall have documented testing procedures based upon official test methods, or test methods which have been validated for the intended use consistent with GLP requirements as applicable (e.g. EPA, FDA, AOAC). All analysts shall receive proper training in each test method they perform and shall demonstrate proficiency in performing these tests. Arnott's reserves the right to test lab competencies.

Good Agricultural Practices

Supply base providers shall have a documented soil management program in place to reduce the risk of contaminating product with illness-causing microorganisms found in soil during growth and harvesting. A documented water management program shall be in place. Water used for irrigation, cooling, or processing shall be free of microbial contamination. Supply base provider shall ensure employees comply with hygienic practices to the extent necessary to protect against the contamination of food. A documented

program shall be in place to properly control and manage the cleanliness of product contact surfaces such as conveyors, tools, utensils, knives, tables, totes, and containers during harvesting.

4.0 – ALLERGEN CONTROL

The following have been identified by Codex Alimentarius (section 4.2.1.4 of General Standards for the Labelling of Pre-packaged Foods) and Arnott's as major food allergens and ingredients of concern which must be controlled against cross-contamination and declared on finished product labels.

- Cereals containing gluten (i.e. wheat, rye, barley, oats, spelt, or hybridized strains) and products of these
- Wheat and wheat products
- Crustaceans and products of these (shrimp, etc.)
- Molluscs and products of these (clams, etc.)
- Fish and fish products (cod, salmon, etc.)
- Eggs and egg products
- Milk and milk products (including lactose)
- Peanuts and products of these
- Tree Nuts and nut products
- Soybeans and products of these (includes soy lecithin and soy flour)
- Sesame Seeds
- Sulphites (Sulphites) in concentrations of 10 mg/kg or more
- Lupin

Highly refined, hot-solvent extracted, bleached, and deodorized oils derived from any of the above may be considered to be non-allergenic, unless required by local regulations to be considered allergenic. Note: cold pressed oils are considered an allergen risk.

Some regions/countries, globally, have additional regulatory requirements regarding the management and control of allergens beyond those listed above. These regulations must be taken into consideration when manufacturing products in those regions/countries and when manufacturing products to be exported into those regions/countries. For more information, please see the Food Allergy Research and Resource Program (FARRP)–International Allergen Regulatory Chart: http://farrp.unl.edu/web/farrp/IRChart

Supply base providers must maintain a master list of all allergens managed and controlled at their facility.

Supply base providers must perform a complete and thorough allergen risk assessment as part of their HACCP plan. The risk assessment shall be based on but not be limited to ingredients, line/work unit, scheduling and changeovers, labelling, rework, dedicated equipment/lines – segregation, processing room air flows, dust management, and storage.

Traffic patterns for ingredients, packaging materials, equipment, tools/utensils/containers, waste, and employees, based on risk, shall be controlled during handling and processing of allergen containing products in order to prevent cross-contact.

The amount of equipment exposed to an allergen(s) shall be minimized. Avoid line crossovers, where possible, and allow adequate space for effective cleaning.

For racked ingredients, allergenic ingredients shall not be stored above non-allergenic products or different allergens. In extreme cases where this is not possible, documented procedures shall be in place to manage spillage and cross-contamination. Whenever possible, allergen containing ingredients should be stored in segregated areas. For floor bays, horizontal separation should be maintained between ingredients that do not contain identical allergens; barriers or sheeting may be used as needed. All raw ingredient containers shall have lids or be sealed.

Supply base provider shall have a documented procedure in place in the event of an allergen spillage to minimize cross-contamination.

Tools/utensils/containers (i.e. brushes, scoops, measuring devices, shovels, buckets, etc.) shall be color-coded and/or dedicated and clearly labelled to identify those to be used with allergen containing products. A document shall be in place and posted describing the color-coding and/or label identification system. All tools/utensils/containers shall be adequately cleaned per validated cleaning method. If adequate cleaning is not possible, separate tools/utensils/containers must be used.

Supply base providers shall develop and utilize an allergen product changeover grid or similar alternative to help facilitate an effective production schedule, minimize the allergen impact on finished products, and ensure sufficient time to allow for changeovers and allergen cleaning. Whenever possible, isolate allergens to separate or designated lines. Allergen containing products should follow non-allergen containing products.

Supply base providers shall develop and maintain allergen cleaning procedures specific to their manufacturing requirements, equipment, and environment. The facility shall be responsible for validating the effectiveness of cleaning procedures, instructions, and materials that will result in the adequate removal of the allergen(s).

Supply base providers shall conduct an allergen self-assessment, at minimum, annually and when the following occurs: new ingredients, new or re-formulated products are introduced, processes are new or modified, equipment changes, and changes in chemicals or sanitation procedures.

5.0 – FOREIGN AND EXTRANEOUS MATERIALS CONTROL

Supply base providers shall have documented programs in place to prevent contamination from foreign and extraneous materials. The program shall address, at minimum, the following elements:

Overhead Structures
Overhead structures which can be easily accessed shall be checked prior to the start of production for any potential foreign material such as loose paint and plaster, rust, deteriorated pipe insulation, etc. where food, food containers, packaging materials, or food manufacturing equipment are at risk of contamination. Appropriate corrective actions shall be conducted to prevent contamination; and all actions shall be documented. Overhead structures which cannot be easily accessed must be inspected and cleaned on a sufficient frequency.

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

Non-Brittle Plastics
A list of high risk non-brittle plastics susceptible to foreign material incidents shall be compiled and documented. These items shall be regularly inspected for evidence of deterioration or damage (e.g. product belts, conveyors, ingredient receptacles, etc.); all inspections should be documented. Whenever possible, high risk non-brittle plastics should be detectable. Plastic liners used for ingredient scaling/prep, covering of in-process ingredients, carryover product, lining bins, etc. shall be a minimum of 2 mil/0.002 inch = 50.8 micron/0.0508 mm = 200 gauge. The plastic liners shall be a contrasting colour

to that of its contents (preferably blue) and may not be clear, tan/light brown, or black. Only food grade bags shall be used for covering, staging, or storing ingredients / food-contact packaging materials.

Glass, Porcelain, Ceramics, and Brittle Plastics

Glass, porcelain, ceramics, and brittle (easily broken or cracked, shatter-able) plastics shall be prohibited in manufacturing, handling, and storage areas unless there are absolutely no alternatives. A list of all glass, porcelain, ceramics, and brittle plastics shall be compiled, including object name and location. Inspections for evidence of breakage, deterioration, or damage shall be conducted at specified frequencies based on potential product risks. The facility shall have documented steps to be taken if glass, porcelain, ceramic, or brittle plastic breakage occurs. All breakage incidences shall be investigated and documented including: object, location, possible source, root cause, corrective and preventative actions, and disposition of any affected product or materials.

Wood Restrictions and Pallets

Wood shall be excluded from all areas where there is a potential for product or equipment contamination. Exceptions: Wooden pallets and wooden totes may be utilized as long as there is a documented program detailing precautions taken to avoid any potential product or equipment contamination. If wooden pallets are used, they should be structurally sound with no broken stringers or boards. If plastic pallets are used, a documented inspection program shall be implemented to remove damaged pallets from use.

Tape

The use of tape shall be avoided; however, if it is necessary to the operation (e.g. sealing ingredient bags), only bright coloured tape of a contrasting colour to the product and packaging shall be used. Clear tape may be used to affix signs and documents (e.g. work instructions) to fixed items (e.g. walls or tables).

Devices

Foreign and/or extraneous material detection and/or removal devices shall be installed at relevant points along processing lines, from raw material through to finished product packing, to detect and/or remove foreign and extraneous material that may have entered the product stream and extraneous material that is naturally occurring in ingredients. Devices shall be fully operational at the start of production and throughout the manufacturing process. Flow charts shall be developed that clearly identify the location and type of all devices throughout each line or process. Registers (lists) shall be maintained for all foreign and extraneous material devices which detail, at minimum, the type of device, location, and validated capability/sensitivity. This may be part of the HACCP flow chart and overall HACCP plan. Each facility shall have documented procedures or work instructions for monitoring all detection and removal devices, which includes set up, operation, and if applicable, the effectiveness of the reject mechanism. Risk assessments shall be conducted to determine the frequency of monitoring required for each device. Foreign material found during device monitoring activities shall be documented. Findings of unusual or excessive extraneous material shall be reported to facility management. Corrective actions shall be implemented, where necessary, to minimize reoccurrence.

Metal Detectors

Metal detectors shall be capable of detecting ferrous, non-ferrous, and stainless steel.
The sensitivity and metal test piece sizes shall be established to detect the smallest possible metal contaminant with consideration of product attributes and the manufacturing environment that affect detection capabilities. Justification explaining how these limits were arrived at shall be established and documented. The limits on finished material shall be documented as part of the supply base provider's specification provided to Arnott's. Belt metal detectors should have a functioning reject or isolation mechanism and have functioning line stop. Metal detectors shall have an audible and/or visual indication of the detection. It is strongly recommended that the devices have a failsafe design such that the loss of energy (e.g. air or control power) results in the rejection of all materials or a line stop. Metal detectors with a rejection or isolation mechanism shall allow for a secure (can't re-enter the product stream) area for the rejected product.

X-Ray Units
X-ray units shall be capable of detecting ferrous, non-ferrous, stainless steel, and glass. The sensitivity and test piece sizes shall be established to detect the smallest possible contaminant with consideration of product attribute and the manufacturing environment that affect detection capabilities. Justification explaining how these limits were arrived at shall be established and documented. The limits on finished material shall be documented as part of the supply base provider's specification provided to Arnott's. X-ray units having a functioning reject or isolation mechanism are considered a best practice; however, at minimum, devices shall have functioning line stop. X-ray units shall have an audible and/or visual indication of the detection. It is strongly recommended that the devices have a failsafe design such that the loss of energy (e.g. air or control power) results in the rejection of all materials or a line stop. X-ray unit's rejection or isolation mechanism shall allow for a secure (can't re-enter the product stream) area for the rejected product.

Product/Material Contamination
Each facility shall have a detailed process in place for effectively managing and documenting product/material contaminated by or suspected of contamination by foreign and extraneous material. All exhibits shall be retained and a root cause analysis conducted.

6 – TRACEABILITY AND MOCK RECALL

Supply base providers shall have a system in place to trace all incoming materials (ingredients and packaging) forward and backward from receipt at the facility, through all processes, until delivery of finished product to their customer. The traceability system shall meet all regulatory requirements.

Traceability
Supply base providers shall have a traceability system implemented. Traceability must include, but not be limited to, all steps within the manufacturing system such as processing aids, bulk storage, work in process, rework, withheld materials, etc. Procedures must be in place to uniquely identify all materials (incoming materials, in-process batches, rework, and finished product) as they move through all stages of manufacturing and delivery. This identifying information must remain on or with the traceable item until that item is used in the manufacturing process or destroyed. A documentation system must be in place to record product identification information for all materials through all stages of manufacturing and delivery. Refer to section 13.0-Coding and Labelling for more details on product identification. This system can be manual or electronic provided that the time required to access the information maintains compliance with regulatory and/or Arnott's expectations.

A trace of a material at any stage within the manufacturing system must be completed and records made available as soon as possible; within four (4) hours (finished product) to six (6) hours (incoming materials). A trace must achieve effectiveness expectations, aligned with industry standards, as established by the Supply Base Provider and/or Arnott's. If established effectiveness expectations cannot be achieved, a root cause analysis must be performed and corrective actions implemented, verified, and documented.

Mock Recalls
Supply base provider's traceability system capability shall be regularly evaluated through the completion of mock recalls. Ingredient, Primary Packaging, and Finished Product mock recall exercises shall be completely annually (every twelve months) or at an alternate frequency agreed upon and documented by an Arnott's Quality representative.

Mock recalls must be completed, and records made retrievable, within four (4) hours (finished product) to six (6) hours (raw materials) of the mock recall being initiated. Elapsed time must be recorded upon completion of the mock recall. When mock recall results do not meet expectations, supply base providers shall perform investigation and corrective action, and a second mock recall may be necessary. Results of

mock recalls shall be documented, be kept on file, and made available upon request. Results shall be made available to an Arnott's Representative upon request.

The goal during any recall event is to reconcile 100% of the incoming materials received or finished product produced. However, when bulk ingredients (materials received and stored in a manner that does not always permit lot separation) are involved in the reconciliation at least 100% of the ingredient and finished product affected must be accounted for. When bulk ingredients are reconciled greater than 100% is acceptable if necessary, in order to retrieve the totality of the product affected.

In the event of an actual recall of supplied material, the supply base provider shall immediately notify the appropriate Arnott's Representative. In the event of an actual recall of Arnott's finished product, the supply base provider will be contacted directly by the appropriate Arnott's Representative. Supply base providers shall never initiate a recall of any Arnott's product without prior authorization from Arnott's.

7.0 – PEST CONTROL

Each facility shall have a documented program in place to effectively control pest activity and risks. The program shall be managed and executed by trained, licensed plant personnel and/or approved outside contractors. Only certified pest control operators (PCO) or personnel with equivalent training shall perform pest control activities. The program shall include, but not be limited to, service frequency, type, number, and location of devices, types of inspections, and treatments. The program shall meet all federal, state, and local regulations. Internal assessments shall be conducted, at minimum, yearly to ensure the PCO is following the pest control program and to verify the effectiveness of the program. Results of the assessment shall be documented and if necessary, used to update and improve the pest control program.

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

The use of pesticides (insecticides, fungicides, rodenticides, and fumigants) shall be in accordance with current local laws and regulations. Only personnel meeting local regulatory requirements for registration, certification, and/or licensing may apply pesticides. The use of unlicensed pest control chemicals is prohibited. It is recommended to rotate the type of pesticides used to avoid resistance developing in target pests.

The following information, at minimum, shall be recorded on each report as part of the program:

- Any observed evidence of pest activity (i.e. insects, rodent droppings, trap and/or bait station activity, etc.), trending analysis by location, and appropriately agreed upon corrective/preventative actions between the facility and PCO based on findings
- Pesticides: person applying, type applied, quantities and concentrations used, areas treated, target pest, and the appropriate regulatory registration number as required by law

The following documentation, at minimum, shall be maintained up to date and on file:

- Current site map with all numbered pest control device locations and type of device clearly identified. This includes the use of temporary devices.
- Approved pesticide usage list
- Material Safety Data Sheet (MSDS) or equivalent for all pesticides used and/or stored at the facility
- Copies of labels for all pesticide stored on site
- Instructions for the effective usage of all pesticides
- Pest control operator (PCO) license with expiration date, certification, or training details
- Pesticide applicator's proof of insurance

If insect/rodent infestation is identified, immediate actions shall be taken to eliminate the hazard. Any infested product/material shall be controlled in such a way as to prevent the potential contamination of other product/material, the facility, and surrounding area.

8.0 – FACILITY SITE AND INFRASTRUCTURE

Buildings shall be designed with a logical flow for air, materials, products, equipment, personnel, and waste to minimize product contamination.
Doors, hatches, and windows shall be properly sealed and protected, when closed; and maintained in good condition, kept clean, and closed when not in use. Windows within or adjacent to manufacturing, handling, and storage areas shall be made of polycarbonate, acrylic, shatterproof material, or covered in protective film. Walls and floors shall be maintained in good condition, kept clean, and free of pits, cracks, and crevices. Drains shall be cleaned and maintained to prevent build up, doors, and pest harbourage; and shall be routinely sanitized. Ceilings and overhead structures shall be maintained in good condition, be free of rust, peeling paint, plaster, dust, debris, cobwebs, mould, and kept clean. Roof leaks shall be identified, controlled, and fixed in a timely manner. Stairs, catwalks, platforms, pipes, ducts, fixtures, and conduits shall be located, designed, and maintained in a manner that does not contaminate food, food-packaging materials, food contact surfaces, or processing tools or equipment.

Construction/maintenance projects shall be effectively managed and temporary structures (if used), shall be designed, constructed, located, and adequately controlled in order to prevent product contamination.

Potable water (including ice and steam) shall be readily available, of suitable temperature, and sufficient pressure to meet the needs of the operation. Only potable water (including ice and steam), as necessary, shall be used for activities involving food, food contact surfaces and equipment, food storage and handling areas, cleaning and sanitizing, and hand washing. Potable water (including ice and steam) shall meet national and local safety standards for chemical and microbiological specifications and have no cross connections or back-siphonage with non-potable water sources. Non-potable water lines shall be clearly identified. Systems to store or convey potable water, whether in gas, liquid, or solid form, shall be designed and maintained to ensure chemical and microbiological specifications are met at all times. Steam sources shall be adequately ventilated or equipped with condensate/steam traps as close as possible to the point of use to minimize condensation. Potable water (including steam) introduced into food or coming into contact with food or food contact surfaces/equipment shall be treated or filtered (1 micrometre (micron) or smaller). If used, filters shall be routinely inspected and changed as necessary.

Boiler chemicals, if used, shall be those listed as approved additives which meet relevant specifications and are compliant with local regulations for use in water intended for human consumption. Compressed air, carbon dioxide, nitrogen, and other gas systems used in manufacturing, cleaning, and/or filling operations shall be approved for food contact use and filtered to remove particles of 5 micrometres (microns) or larger and shall not contain oil or water. Filters shall be routinely inspected and changed as necessary.

Fans and air-blowing equipment shall be located, maintained, and operated in a manner that minimizes the potential for contaminating food, food-packaging materials, food contact surfaces, and equipment.

Light fittings shall be shatterproof or protected by a shatterproof covering. Emergency lighting, forklift lights, and other work lights shall be adequately protected or controlled.

Rubbish and waste shall be segregated, stored, and disposed of as to minimize the development of odour and the potential for the waste becoming an attractant, harbourage, or breeding place for pests; and protect against contamination of food ingredients, packaging materials, food contact surfaces, water supplies, and ground surfaces. Accumulation of waste shall not be allowed in ingredient, packaging, food handling, or food storage areas. Waste shall be removed from these areas daily or as often as necessary to prevent accumulation. All spillages shall be cleaned up as quickly as possible.

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

9.0 – PURCHASED MATERIALS CONTROLS

Supply base providers shall ensure their suppliers are comply with the requirements and expectations as detailed in this manual or equivalent.

Supplier Management
Supply base providers shall have a documented program in place to approve and manage suppliers of purchased materials that are used for manufacturing Arnott's products, including ingredients and food contact packaging. The program shall include risk assessments, periodic evaluation of the supplier's performance and facilities, and incoming material assessments. At minimum, the supplier non-conformances and audit results / actions shall be tracked to determine trends and opportunities for improvement.

Supply base providers shall maintain a list of approved suppliers.

Specification and Incoming Material Management
Supply base providers shall have written specifications for purchased materials, which shall be in compliance with all federal, local, country, regional and state regulatory requirements.

Documented controls shall be in place to ensure purchased materials conform to purchase specifications and applicable regulatory requirements. Supply base providers shall have a documented process in place to ensure purchased materials that do not meet specifications or regulations are placed on hold until a proper disposition can be made. Purchased material product disposals shall be conducted according to applicable regulatory requirements.

In addition to these requirements, Co-manufacturer/Co-packers, Re-packers, and Special Packers shall have a system in place to notify Arnott's, in writing, of any ingredient or packaging material specification and/or supplier changes. These changes may be subject to approval by Arnott's if they may adversely impact Arnott's.

10.0 – NOTIFICATION OF CONTRACT MANUFACTURER/ PACKER USE

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

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

11.0 – PROCESSING AND REWORK CONTROLS

Processing

Supply base providers shall have manufacturing or process control procedures in place to ensure products meet all Arnott's Food Safety, Quality, and material specification requirements. Where appropriate, statistical methodology should be used to determine system capabilities. Plant personnel shall have access, as needed, to the most current process control procedures, product requirements, and specifications. In-process and finished products shall be inspected and tested to ensure conformance to these requirements and specifications. Records must be kept for process data, inspections, and testing results. Certificates of analysis (COA) shall be provided to Arnott's upon request.

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

Supply base providers shall have a documented process for managing the filling of containers/packages by weight in compliance with regulatory requirements in the country of manufacture and the intended country of sale.

Supply base providers shall a documented process for releasing finished product.

Arnott's will provide supplemental requirements for processing conditions and/or product type as appropriate to the commercialization of the material.

Rework

Supply base providers shall have a documented system that controls the use of reworked material in ingredient(s), packaging material(s), work in progress (WIP), and finished product(s) in order to prevent the "add back" of materials that may cause physical, biological, or chemical contamination.

Rework shall be identified with the product name, production date, and original lot number(s) in order help maintain traceability. In addition, rework containing allergens shall be clearly identified. Rework shall be segregated from other materials and products either via an inventory management system or physical separation. Rework shall not be stored for a prolong period of time. All rework shall be stored at an appropriate temperature and/or humidity to ensure it does not deteriorate.

Trained personnel shall conduct documented evaluations on each batch of rework prior to use to determine:

- Shelf life. (i.e. will it shorten the shelf life of the finished product?)
- Any adverse effects on the finished product. (Organoleptic degradation.)
- The quantity to be used. (allowable "add-back" percentage.)

Rework material may be used if it is identical formulation to the product it is being added into. Note: Where reworked product is not identical into identical, documented evidence shall be provided to prove that the materials do not impact the ingredient label, affect the allergen content, or invalidate product produced under special circumstances.

The product formulas and processing directions shall have specific provisions regarding the use of rework material, including but not limited to the percentage of rework permissible in the product. This information shall be documented and maintained. For Contract Manufacturers of Arnott's product, rework levels must be shared with and agreed to by an Arnott's Quality Representative. Supply base providers shall have documented control measures in place where rework activities involve removing a product from filled or wrapped packages in order to prevent it from becoming a foreign material risk.

Rework shall be tracked as incoming material when packaged in a different run than originally produced. The original lot numbers shall be recorded on the production records. Batch formulation / processing records shall be maintained that identify the usage and amount of re-worked product.

12 – PRODUCT PACKAGING

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

Plastic Liners:

- Shall have contrasting colour to that of its contents and may not be clear, tan, or black
- Shall have a gauge thick enough not to tear and a minimum of 50 micrometres ("microns") and 75 micrometres for individual fill weights >25 kg
- Shall be heat sealed or folded or knotted not stapled or clipped

Paper or Nylon Laminated Polyethylene Bags:

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

Boxes/Cartons/Cases/Totes:

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

Drums:

- Should have only metal detectable tamper evident closures

Supersacks/Bulk Bags/Bulka-Bags:

- Closure strings shall not be too long as to cause potential product contamination and shall not be fraying or able to come loose / dislodge
- Closure strings should be of contrasting colour to its contents
- No exposed or loose string ends or stitching shall be present inside the bags

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

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

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

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

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

13.0 – CODING AND LABELING CONTROLS

Supply base providers shall have controls in place to ensure proper coding and labelling of food products, ingredients, and packaging materials supplied to Arnott's.

Coding of individual containers and shipping cases must include lot/batch numbers and comply with Arnott's business requirements and all applicable regulatory requirements at the location of manufacture and location of use by Arnott's. The code shall be accurate and legible and must contain sufficient information to facilitate effective traceback of the product to production location. For Co-manufacturer/Co-packers, Re-packers, and Special packers, Arnott's will provide a coding format for individual containers and shipping cases.

Retail and Food Service product labels shall be pre-approved by the Arnott's Regulatory Affairs Department. Arnott's will provide written approvals for Retail and Food Service Labels and will include instructions for special handling, formula numbers, effective dates, and formula version numbers.

Supply base providers shall have documented label controls shall be in place during production for on-line inspection and application. Verification procedures shall be in place to prevent inadvertent mislabelling and to verify the correct label version based on the product formulation. Upon completion of production, all label materials shall be removed from the line and the line shall be inspected for complete clearance of all labels/labelled packaging and product from the labelling equipment and the surrounding area.

For packaging suppliers of labels or labelled packaging, a comprehensive mix prevention program shall be documented and implemented including detailed line clearance procedures for all pieces of equipment.

Ingredient / Raw Material / Packaging Labels shall include Arnott's required product codes (Material or Corporate number), lot/batch numbers, production codes, manufacturing plant designation, product name, ingredient statement, net contents statement, shelf life indicator: expiration or best before date, or use by date, and the name of the manufacturer and location. Ingredient statements shall match the ingredient specification. This label information shall be conspicuously marked on each unit and when possible, be facing the exterior of the pallet.

Arnott's trademarks shall not be used in any manner except as pre-approved in writing by the Arnott's Legal Department.

14.0 – SANITATION

A documented sanitation program shall be in place which meets all regulatory and Arnott's requirements. Only trained/qualified employees or contractors shall perform sanitation activities. Only cleaning and sanitizing chemicals that are approved for use in food manufacturing facilities shall be used for the specific purposes intended. Cleaning and sanitizing chemicals shall be properly stored and labelled. Sanitation tools and utensils must be suitable for, and dedicated for intended use and shall be clean, properly maintained. Cleaning, sanitation, production, and non-food contact tools and utensils shall be properly segregated and stored in a clean, sanitary manner. There shall be a system in place to monitor the critical points of the sanitation process such as temperatures, chemical concentrations, flow rates, time, pH, etc. For CIP, test results shall be available to demonstrate the chemicals have been effectively flushed from all pipes and tanks. Schedules for cleaning and sanitation activities shall be developed for each facility based on industry standards, regulatory requirements, and/or manufacturer recommendations for specific pieces of equipment. A system for validating and documenting the effectiveness of the sanitation program shall be in place (audits, swabs, ATP, other).

Supply base provider production/processing equipment must be constructed in a manner to ensure effective and efficient cleaning of the equipment over its life span.

Supply base providers are responsible for documenting and implementing Sanitation Standard Operating Procedures (SSOP's) specific to their production areas, processing equipment, and other areas/parts of the facility. SSOP's shall be detailed and include description and scope of the cleaning procedures, equipment and products, and responsible parties. All SSOPs shall be validated and verified at minimum annually to assess the cleaning and sanitation effectiveness. Supply base providers shall select sanitation methods which are in-line with both the capability of the manufacturing facility as well as the risk associated with products being manufactured. Test methods should also be chosen based on relevance for assessing sanitation performance and fit within the manufacturing facility.

Accurate written records of all cleaning and sanitation activities shall be maintained. Review and auditing of the cleaning program shall include annual review of validation and verification efforts.

Supply base providers shall have a documented environmental monitoring program in place to verify the effectiveness of pathogen controls in processes where food is exposed to a potential contaminant in the environment. Program swabbing records shall be maintain and shall include but not be limited to date, initials, location, area, results, and if necessary, corrective actions.

15.0 – STORAGE, WAREHOUSE, AND TRANSPORTATION/ DISTRIBUTION

Supply base providers shall store and transport packaging materials, ingredients, and finished product in a manner to maintain product safety, integrity, quality, and prevent contamination (direct or environmental) and/or degradation.

Storage areas should be in good repair and be adequately insulated to maintain temperatures as necessary. Storage areas shall be easily accessible for inspection, cleaning, and maintenance. All raw materials and finished product shall be stored off of the floor and away from walls (recommended distance = ≥ 18 in./0.5 m). If racking is used, it should be designed to permit cleaning of the floors and the storage area. Racking material shall have a smooth, non-absorbent surface that is free from crevices and easy to clean. Wooden pallets shall have a slip sheet between the pallet and materials for all materials with risk of contamination by wood through the package. Pallet slips/slip sheets/layer pads shall be used when double stacking pallets of raw materials and finished product with risk of potential contamination of wood through the package. Refrigerated/chilled/frozen storage shall be designed to permit the hygienic and efficient chilling of food. Storage areas shall be capable of maintaining product temperature and/or humidity as defined by regulations and/or Arnott's specifications with proper monitoring systems or procedures in place. Documented procedures shall be in place for the management of refrigerated/chilled/frozen product when transferring between and outside of temperature-controlled areas is necessary. Bulk storage facilities shall be designed to minimize the risk of foreign material contamination and unauthorized access. All raw materials and finished product in storage areas shall be clearly identified to facilitate storage and correct stock rotation.

Warehouses shall be properly constructed and maintained to prevent contamination or degradation of all raw materials and finished product. If offsite storage/warehouse (dry storage, freezer, cooler) is to be used by the supply base provider, the facility is subject to approval by Arnott's which may include an inspection or audit by either a representative from or on behalf of Arnott's.

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

Bulk food tank/trailer/containers:

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

Loading and unloading practices shall be designed to minimize unnecessary exposure of products to conditions detrimental to maintaining product and package integrity. Loading and unloading areas/ramps shall have protection devices in place to shelter the products from external elements (climate, pollen, dust, etc.). Before loading, all food transport vehicles shall be inspected, and results documented. All loads must be adequately secured. When products must be transported at a specified temperature range, before loading, the temperature inside the food transport vehicle shall be checked and documented. Adequate temperature control shall be maintained through transport. Temperature recorders, if used, shall be clearly identified on the Bill of Lading (BOL) and packages; and shall be secured to the load.

Arnott's will not accept deliveries:

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

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

- Protect all food from the likelihood of contamination by utilizing foreign material control/indication devices when loading and/or unloading bulk food tank/trailer/container vehicles.
- Comply with industry and regulatory transport practices
- Receive on-going GMP, hygiene, quality, and food safety training
- Have food safety control measures in place that are actively monitored and documented.

SHIPPING

Pallets/Palletising:

- Pallets shall be dry, well-constructed, and not cracked, broken or damaged
- Pallets shall be free of insects, insect webbing, mould, debris, odour, and flaking paint
- Slip sheet or layer pad should to be used between the pallet and the product load for raw materials; and for finished products if indicated on the distribution specification.
- Products shall be palletised in such a way that there is no excessive overhang on any side of the pallet
- Products shall be evenly distributed across the pallet
- Product pallets must have a unique pallet identification (ID) placard or tag

All products shall be inspected prior to loading to ensure damaged product is not shipped.

Supply base providers should strive to keep the number of lot numbers shipped per each shipment to a minimum, ideally no more than one lot per pallet and no more than two lot numbers per shipment.

Bill of Lading or Packing List

Supply base providers must include the following information on shipping documents (Bill of Lading or packing list): Product Name, Arnott's Product/Material Number (full numeric code), Lot/Batch Numbers, quantities per each lot/batch#, and dates of Manufacture for each lot/batch clearly stated in a calendar format (DDMMMYYYY, where D= 2 digit day, M=abbreviated 3 digit month, and Y is full 4 digit year preferred). It is also recommended to include the Expiration or Best-before Dates for each lot/batch # using the same calendar format chosen for date of manufacture. Any and all transfers of materials between original manufacturer and another supply base provider must maintain this information with the last supply base provider point of contact ensuring all new documentation generated meets these expectations at the time of reception at an Arnott's facility.

Material Shipping Waiver

Shipping material out of specification and/or with micro testing requirements without micro clearance completed is not permitted; however, in the rare event that as exception could be granted or requested, this must be conducted in a controlled manner with the Arnott's Procurement Representative, Plant Quality Manager, and BU Supply Quality Lead signing off on approval. The material shall be labelled on all four sides with red tags "shipped on hold see Plant Quality Manager before use". Supply base provider shall provide a corrective action plan to prevent recurrence.

16 – INCIDENT INVESTIGATION AND REPORTING

Supply base providers shall have a documented program in place for identifying and managing external food safety, quality, and regulatory incidents having an impact to food manufacture or consumer goods industries and that may impact their incoming materials or manufactured products. The program shall include but not be limited to receiving information of a possible incident, assigning an incident leader, performing an initial investigation, conducting a risk assessment, determine product disposition (if necessary), and completing any necessary corrective actions and follow-ups. All aspects of the investigation shall be properly documented and effectively communication internally and as needed, externally, including notifying Arnott's immediately if any Arnott's products may be affected.

17.0 – EQUIPMENT CALIBRATION PROGRAM

Calibration is defined as the process of comparing the measurement results from a piece of equipment against a known national or international standard/reference method. Each facility shall have a documented calibration program. The program shall meet any applicable regulatory and industry requirements.

Facilities shall maintain list(s)/log(s)/record(s) of critical (related to food safety, quality, and regulatory) equipment requiring calibration. List(s)/log(s)/record(s) shall include the following, at minimum:

- Equipment Identification (ID) number
- Description
- Type (whether calibration is conducted internally or externally)
- Manufacturer
- Serial Number
- Location
- Calibration Frequency
- Standard/Reference
- Date of Calibration
- Calibration Company (if calibrated externally)
- Printed name and initials or signature of the person who conducted the calibration
- Re-Calibration Date
- Acceptance Limits
- Regulatory Requirements (if applicable)

Critical equipment not maintained on equipment calibration list(s)/log(s)/record(s) shall be automatically deemed not calibrated.

Calibration frequency shall be established for critical food safety, quality, and regulatory equipment. It is imperative that new food safety, quality, and regulatory equipment is calibrated prior to being used for the first time. The calibration frequency may be determined according to:

- Manufacturers recommended calibration interval
- Prior to and after a critical project (i.e. new line or product commissioning)
- After an event (i.e. if equipment may have been damaged)
- Critical nature of the measurement (i.e. CCP [Critical Control Points])
- History and/or Reliability of calibration
- Incidents and/or complaints

If calibration is due on equipment that is idle (i.e. plant shutdown, equipment in storage), the calibration due date may be postponed until the equipment is ready to be brought back into service. Calibration shall be completed prior to equipment being recommissioned. This extension shall be noted on equipment calibration list(s)/log(s)/record(s).

Equipment shall be identified with a label. The label shall include, at minimum, the equipment ID number. Where possible, the label should also include the date of calibration, initials of the person who conducted the calibration, and re-calibration date.

Procedures shall be developed and maintained for all internally calibrated equipment. Equipment manufacturer recommendations shall be used when developing the calibration procedures. External calibration facilities/laboratories shall have independent 3rd party accreditation to recognized standards.

Internal calibration records and external calibration certificates shall be maintained for inspection, measuring, and test equipment related to food safety, quality, and regulatory compliance.

Each facility shall have a documented process in place for equipment that is deemed out of calibration. Any material produced with out of calibration equipment shall be placed on hold and reassessed.

18.0 – DOCUMENTS, DATA, RECORDS, AND RETAIN SAMPLES

Supply base providers shall establish and maintain documented procedures to control and secure all documents, data, and records that relate to raw materials, production, processing, and finished product. This includes, but is not limited to, HACCP plans, formulas, label approvals, standard operating procedures, laboratory manuals, product testing results, and quality records.

These procedures shall ensure that:

- Current documents are available at locations within the facility essential to the effective functioning of the food safety and quality system.
- Invalid and/or obsolete documents are promptly removed from all points of use to prevent unintended use.
- Any obsolete documents retained for legal and/or knowledge-preservation purposes are suitably identified.

Data shall be collected and recorded automatically or by trained personnel, when appropriate, for food safety and quality tasks/activities (tests, monitoring, verifying, evaluations, audits, inspections, reviews, or analysis). Data shall only be recorded at the time in which the task/activity is conducted. There shall be no missing or blank data blocks without an explanation of lack of data. The actual sample re-check data shall be entered on the record; it is not sufficient to simply indicate that a re-check was made.

Food safety and quality records must either be written in indelible ink/marker or entered electronically in a secure system. Ink pens used in the facility shall only be company approved one piece and no cap; wholly metallic ink pens are recommended. Pencils and erasers are prohibited. Supply base provider shall have a process in place for effectively controlling or eliminating the following loose items: rubber bands, paper clips, thumbtacks, pushpins, and staples.

Written records shall be legible. Any alterations to written records shall be made by:

- Using a single line to cross out the incorrect entry
- Writing in the correct entry
- Dating and initialling the change

The use of correction fluid or correction tape is not permitted.
Records must be signed or initialled and dated by the person completing the task/activity.

Electronic systems used for food safety records (without a paper trace) must be validated and in compliance with local regulations.

For any formulas, procedures, bill of materials (BOMs), and specifications related to product manufactured for or with Arnott's, the supply base provider shall:

- Ensure access to these documents is secured and restricted from unauthorized access.
- Only permit access to personnel who have a confidentiality agreement in place.
- Not disseminate these documents to any outside sources.
- Follow the direction of the Arnott's Representative for disposition of obsolete documents.

Supply base providers shall maintain records for three years, the product shelf life plus one year, or for the time period required by federal, regional, country, state, or local regulations, whatever is the greater. All records for products, packaging materials, and ingredients shall be available for review during audits or inspections by Arnott's representatives. Records shall be stored in a secure area, shall be easily retrievable, and must relate to all critical process, food safety, and quality monitoring points in the manufacturing, storage, and distribution of the products, packaging materials, and ingredients provided to Arnott's. Retrievability of records shall be tested and documented during mock recall exercises.

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

19.0 – PRODUCT HOLD AND RELEASE CONTROLS

Supply base providers shall have effective documented controls in place to prevent the inadvertent shipment of non-conforming products, ingredients, or packaging materials to Arnott's or to the trade. Withheld or rejected products or materials shall not be shipped to Arnott's. Only exception is material shipped under conditions of a Material Shipping Waiver as outlined in Section 15.

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

Any products, ingredients, and packaging materials suspected to be non-conforming shall be placed on hold immediately upon discovery. Each pallet or module shall be identified and controlled. Identification may be physical (tags labelled as "ON HOLD" or words to that effect) or electronic. An electronic (computerized) system (such as SAP Warehouse Management System) is adequate if the system blocks selection of non-conforming product/material and prohibits usage and distribution. Withheld materials should be placed in a dedicated or segregated storage area. Each non-conformance that led to a product or material hold shall be evaluated for root cause. Corrective action shall be taken and documented to prevent like situations from recurring.

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

If product, packaging materials, or ingredients are inadvertently or improperly released from hold status, Arnott's must be notified immediately.

Disposition shall be determined and completed in a timely manner and shall include code dates and quantities involved. For Co-manufacturer/Co-packers, Re-packers, and Special packers documented authorization is required from Arnott's before disposition actions are taken. Product disposals shall be conducted according to applicable regulatory requirements. Product shall not be donated or distributed in any manner, including but not limited to making available product to facility's employees without Arnott's approval.

Product designated for destruction shall be handled in a way to assure proper defacement and disposal so that it cannot possibly enter the stream of commerce or consumption. Procedures for destruction shall

include confirmation requirements, especially for food safety issues. Records shall be kept and include the product affected, date of production, number of units, date of destruction, and signature of the responsible person and witness.

Supply base providers shall develop and maintain an internal verification process to ensure that non-conforming and withheld product/material is being identified, isolated, evaluated, and dispositioned compliant to above expectations. An actual physical count of withheld and non-conforming products and materials shall be conducted at minimum annually. The root cause of discrepancies shall be investigated, and corrective actions implemented. Findings and actions shall be documented.

20.0 – AUDITS AND INSPECTIONS

Each facility shall plan and conduct routine / regular facility and product inspections. These inspections may include areas such as production start-up, GMP checks, product evaluations, etc. Any deviations shall be documented along with appropriate corrective actions.

Each facility shall establish an internal audit program to assess and review compliance against company and Arnott's requirements, procedures, practices, etc. related to food safety and quality. Internal audits shall be conducted at minimum once a year and audits shall be conducted by individuals at the facility and where possible, be independent of the area they are auditing. Results of the audit shall be communicated to appropriate management and responsible parties. All audit findings and corrective / preventative actions shall be maintained. Follow-up activities shall be conducted and documented to verify corrective / preventative actions have been completed.

All supply base providers shall have on-going 3rd party audits performed on their food safety and quality systems. For Co-manufacturer/Co-packers, Re-packers, Licensees, Ingredient, and Direct Food Contact Packaging suppliers, the 3rd party audit shall be conducted using one of the GFSI (Global Food Safety Initiative) recognized scheme standardshttp://www.mygfsi.com and https://o6sjjr51c02w1nyw2yk6jvmw-wpengine.netdna-ssl.com/wp-content/uploads/2019/09/CPO_printable-version_A3_20200424.pdf
It shall be noted that achievement of a 3rd party accredited GFSI recognized scheme standard does not automatically mean the facility will be approved by Arnott's. If any Co-manufacturer/Co-packer, Re-packer, Licensee, Ingredient, or Direct Food Contact Packaging supplier is unable or unwilling to achieve a GFSI recognized accreditation and for all other supply base providers, they shall provide another independent food safety and quality system audit report with corrective actions to an Arnott's Supply Quality Representative. The Arnott's Supply Quality representative will conduct an assessment to determine the equivalency of the audit to a GFSI level certification. As applicable, the Arnott's Supply Quality Representative will establish a plan on how to fill any gaps that have been identified, which may include an on-site audit conducted by a representative from or on behalf of Arnott's or a decision not to approve the location.

Supply base providers are subject to an Arnott's risk assessment which will assign an internal risk level and dictate the frequency of reviews required. Supply base providers shall permit Arnott's Quality, Corp Finance, or Security auditing representatives' access to facilities used to manufacture, pack, or hold finished products, packaging materials, and ingredients. Arnott's Quality, Corp Finance, or Security auditing representatives shall be authorized to enter and audit/inspect at reasonable times any establishment/facility storing, manufacturing, supplying or co-packing finished products, packaging materials, and ingredients for Arnott's. These requirements include those facilities supplying to and through brokers as well as transport vehicles. The audit/inspection may include review of records, processes, controls, and facilities. It is Arnott's policy to give reasonable notice of intent to conduct an audit/inspection. However, nothing in any contract or this manual shall deny the right of Arnott's to conduct unannounced audits by its own representatives, or through firms/agencies that conduct audits/ inspections under contract.

21 – CONTINUOUS IMPROVEMENT

The supply base provider shall define, track, and trend meaningful food safety and quality key performance indicators (KPI's). A key performance indicator (KPI) is a type of performance measurement or metric used to evaluate the progress, success, or achievement of goals and/or objectives.

At minimum, the following KPI's shall be included:

- Line and product specification capabilities (SPC) [excludes warehouse facilities]
- Non-Conformances
- Internal and External Audit Results
- Recalls/Retrievals

KPI information and data shall be reviewed to determine food safety and quality improvements opportunities. This review shall be part of the management review process.

Each facility shall establish (based on but not limited to KPI's) a continuous improvement program with initiatives to continually enhance performance, reliability, efficiency, and effectiveness of food safety and quality management systems. Facilities should follow the Plan-Do-Check-Act Cycle:

- Plan: Identify and analyse the actual or potential issue. Assess where we are and where we need to be. Brainstorm and develop potential countermeasures.
- Do: Test potential countermeasure(s).
- Check: Measure how effective the potential countermeasure(s) are. Make sure there are no negative consequences associated with the potential countermeasure(s). Assess/evaluate if the objective has been accomplished.
- Act: Adjust by trying a different countermeasure if the objective was not accomplished and repeat the cycle or document, standardize, and implement proven solution(s). Notify others across the organization that may benefit from or learn from the improvement solution(s).

Facilities are strongly encouraged to integrate and utilize continuous improvement tools/methods such as Six Sigma, Lean, and/or Kaizen.

Material specifications shall continuously perform at, and as necessary evolve to, the target of its parameter(s) range to ensure optimal performance to Arnott's.

All continuous improvement activities shall be properly documented.

Arnott's will monitor and measure the performance of our supply base through a process of Supplier Relationship Management (SRM) using various sources including but not limited to the Supply base providers owns KPI's, Arnott's collected data (pre-shipment samples, incoming inspection, COAs, etc.), and Arnott's Supply Base Provider Scorecard. Business reviews will take place at a frequency determined by the Arnott's representative and as appropriate to the size and risk of the relationship.

22 – REGULATORY

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

Supply base providers shall immediately notify the Arnott's Contract and Quality Representative when any product produced for Arnott's is directly or indirectly the subject of a Regulatory Contact or Regulatory Action. For example, when product is being shipped directly to an Arnott's plant from a different country, the supply base provider shall immediately notify the Arnott's Plant Representative of any across the

border governmental holds/quarantines to ensure that product is not used until official release authorization notice is verified and communicated by the supplier to the Arnott's Plant Representative. Also, supply base providers shall immediately notify the Arnott's Contract and Quality Representative of any voluntary or involuntary product retrieval.

When any finished product produced for Arnott's or ingredient or packaging material intended for use by Arnott's is sampled by a Regulatory Agency, a duplicate or split sample shall be taken at the time of collection and labelled with identification information; and all product represented by that sample shall be placed on hold. The samples shall be stored in a secure location that will prevent spoiling or contamination; this may mean freezing or for dry ingredients, storage in a cool dry place. The Arnott's Contract Representative shall be advised of the reason for the sampling. In addition, the Arnott's Contract Representative will provide instructions prior to shipment to an Arnott's facility or before continued sale of the sampled product under an Arnott's label. A duplicate sample of the lot sampled by the Regulatory Authorities may be required by Arnott's and shall be made available on request. For supplier generated and owned ingredient or packaging materials, disposition of that material will be based on the regulatory agency decision with the supply base provider.

In the event that a regulatory inspector requests information other than described above (photos, videos, etc.), supply base provider shall notify Arnott's Contract Representative if the information requested is related to Arnott's product.

Supply base providers shall have a process in place for remaining informed of changes to legislation and regulations as well as relevant scientific and technical developments. A process shall be in place for implementing, and/or complying with changes and updating internal documents as appropriate. It is the responsibility of the supply base provider to ensure all product intended for Arnott's and its transport comply with all appropriate and relevant regulations.

23 – FOOD DEFENSE AND PLANT SECURITY

Supply base providers shall develop, document, and maintain a site-specific food defense and plant security plan. The plan shall be based on risk and vulnerabilities identified by the facility and legal and/or regulatory requirements for the location of the facility. The plan shall be re-evaluated (and revised, as necessary) annually, when warranted by internal or external events, and if any relevant regulatory changes occur. As part of the plan, a food defense and plant security strategy shall be developed and implemented to quickly and accurately identify, respond to, and contain threats or acts of intentional adulteration/contamination. Food defense and plant security awareness training shall be conducted for all employees.

All threats and incidents of intentional product tampering or sabotage shall be immediately investigated and thoroughly documented; as related to Arnott's product, the Arnott's Contract and Quality Representatives shall be immediately notified.

Pre-hiring screening and termination activities of employees (permanent, part-time, seasonal, temporary, and contract) shall be conducted and managed. Access to facility, computers, software, and systems shall be controlled.

All chemicals (including laboratory chemicals), toxic or corrosive compounds, cleaning compounds and sanitizing agents shall be clearly labelled and identified and have controlled access via locked areas and/or site security.

All doors and hatches on incoming and outgoing vehicles, excluding open top ingredient trucks, should be sealed with tamper proof, numbered seals and the seal numbers (including numbers on temporary seals) should be shown on shipping documents. Incoming vehicle seals should be examined for integrity and compared to the incoming bill of lading (BOL). It is strongly recommended that trucks making multiple stops or Less Than Full Load (LTL) trucks are secured with padlocks or seals.

Plant doors, windows, roof openings, vent openings, outside trailers, railcars, bulk storage tanks, potable water tanks, and wells shall be secured (e.g. locks, seals, sensors) when not in use.

Updated plant layout schematics shall be maintained in a secure and controlled location. Schematics shall identify all entrances into the plant and accesses to the roof.

Qualified personnel shall conduct periodic, documented food defense and plant security inspections/assessments of the plant. The assessments/inspections shall be evaluated and as necessary, corrective and/or mitigation actions shall be implemented.

The supply base provider shall consider one or more of the following countermeasures as part of their overall program: electronic access control, fencing, gates, access-controlled automated turnstiles, security controls, closed circuit TV (CCTV), adequate external lighting, and alarm system.

NOTE: All U.S. suppliers, both foreign and domestic, must maintain FDA Bio-terrorism registration.

24 – CUSTOMER/CONSUMER COMPLAINTS

Supply base providers shall have a documented program in place for handling customer/consumer complaints. The program shall address responsibilities, response time and corrective actions based on an investigation of the complaint. A log shall be maintained to track complaints by product identification, production dates, cause, and origin of complaint.

Records of complaints and the subsequent investigations and/or corrective actions shall be maintained. Complaint data shall be analysed for trends and used to improve product safety and quality and to avoid recurrence.

25 – RESEARCH AND DEVELOPMENT

Supply base providers shall have documented programs in place for managing product development and changes to existing products/materials. For existing multiple component food products, the following shall be considered when managing changes and how those changes may affect customers/consumers: ingredient statement, nutrition, allergens, claims, standard of identity, form, and function. For existing packaging materials, the following shall be considered when managing changes and how those changes may affect customers/consumers: material, composition, dimension, shape, geometry, and graphics.

As previously stated, in section 1, Supply base providers shall have a documented system in place to manage changes in formulas, materials, processes, systems, equipment, management, and/or production facilities in order to avoid any impact on food safety and quality. The system shall include communication to Arnott's of changes that have a potential impact on food safety and/or quality and if they may adversely impact Arnott's. These changes may be subject to approval by Arnott's.

Research facilities performing any product development for external marketplace shall meet Arnott's food safety and quality requirements for consumer products.

26.0 – EMPLOYEE TRAINING

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

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

Training programs shall be documented, maintained, and training records kept which include a list of participants, completion date, training contents, and effectiveness evaluations to prove employee competency.

Refresher training shall be conducted at frequencies required to maintain competency. In addition, the frequency of training may be necessitated as a result of audit findings and/or product non-conformances, out of specification results, consumer/customer complaints and risk assessments around severity for noncompliance. Refresher training may be accomplished by retraining to a specific topic, coaching, mentoring and/or on-the-job training.

[A] – IRRADIATION, GENETICALLY MODIFIED, AND NANOTECHNOLOGY

Irradiation of Ingredients and/or Packaging Materials

Irradiation is a process of treating food and/or material to a specific dosage of radiation for a predefined length of time to slow or halt spoilage due to the growth of pathogens, delay ripening, increase yield, and/or improve re-hydration.

Supply base providers may be permitted, on a case-by-cases basis, to use irradiation on ingredients and/or packaging materials provided to Arnott's. Consideration shall be given to the appropriate regulations and technology. Supply base providers shall follow the business requirements and labelling regulations of each country to which and for which they provide ingredients and/or packaging materials.

Genetically Modified Ingredients

Genetically modified is an organism whose genetic material has been altered using genetic engineering techniques.

Supply base providers of food products for Arnott's shall follow the business requirements and labelling regulations of each country to which and for which they provide ingredients and/or food products. Genetically modified ingredients shall be identified according to the receiving country requirements.

Ingredients derived from Nanotechnology and usage of materials derived from Nanotechnology in direct contact with ingredients:

Nanotechnology is the manipulation of matter on an atomic and molecular scale.

Supply base providers may be permitted to use Nanotechnology on a case-by-case basis with written permission from Arnott's. Consideration shall be given to the appropriate regulations and technology. Supply base providers shall inform Arnott's when ingredients are derived from nanotechnology or when materials in direct contact with ingredients are derived from nanotechnology for proper safety evaluation.

[B] – HEAVY METALS COMPLIANCE

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

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

Packaging Materials: All elements of packaging including adhesives, labels, inks, dyes and stabilizers and their components

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

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

Lead, Mercury, Cadmium, Hexavalent Chromium

To assure compliance, supply base providers shall conduct periodic or routine monitoring of food products, ingredients, direct food contact packaging, and promotional items. Test results shall be made available to Arnott's upon request via a certificate of analysis (COA). Compliance may be further monitored at the discretion of Arnott's through the use of a pre-shipment sample to Arnott's or an approved 3rd party laboratory.

Materials rejected due to heavy metal contamination shall be disposed of in a manner consistent with all applicable laws and regulations for disposing of such materials.

[C] – CHEMICAL RESIDUE CONTAMINATION CONTROLS

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

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

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

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

Programs shall be in place to ensure that ingredients sold to Arnott's including but not limited to vegetables, fruit, meat, poultry, fish, and milk products do not contain illegal residues of any drugs, pesticides, or chemicals. This includes any residues contributed by food contact packaging. Test results shall be made available to Arnott's upon request via a certificate of analysis (COA). Compliance may be further monitored at the discretion of Arnott's through the use of a pre-shipment sample to a Arnott's or an approved 3rd party laboratory.