# Cargill Supplier and External Manufacturer Requirements Manual



Version 2.1 2014





# NOTE TO OUR SUPPLIERS AND EXTERNAL MANUFACTURERS

I am pleased to introduce Cargill's latest Supplier and External Manufacturer Management Manual. Cargill is committed to providing healthy, nutritional food/feed products and services throughout our supply chain. We will use only those product development, procurement, supply chain, transportation, storage, production, manufacturing, and distribution systems and suppliers that ensure the safety and regulatory compliance of our products. Every Cargill Business Unit, Function, and employee has a responsibility to ensure the production of safe products that comply with the applicable laws, regulations and Corporate Food Safety, Quality and Regulatory requirements. Cargill management will provide the resources and support necessary to enable our employees to fulfill this responsibility.

Through our efforts with you, our suppliers and external manufacturers, we will continue to work to mitigate food/feed safety risks, reduce quality risks, and keep people and animals safe. On behalf of Cargill, I want to thank you for your continuing hard work.

Sincerely,

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Mike Robach VP, Corporate Food Safety, Quality and Regulatory Cargill, Incorporated



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### Introduction

Cargill provides food, agriculture, financial and industrial products and services to the world. Together with farmers, customers, governments and communities, we help people thrive by applying our insights and nearly 150 years of experience. We have 143,000 employees in 67 countries who are committed to feeding the world in a responsible way, reducing environmental impact and improving the communities where we live and work. In light of its geographic, cultural, economic, and regulatory diversity and mission, Cargill has set global food and feed safety, quality and regulatory processes and standards to ensure the consistency and integrity of all of our products and services.

Cargill's mission and food/feed safety policy reflect a core value for Cargill – nourishing people and ensuring that our food and feed products keep people and animals safe. We have complex supply chains, a global footprint that requires full cooperation and support from our suppliers and external manufacturers (S/EMs), and customers focused on food/ feed safety that expect us to do the same with our S/EMs. This requires Cargill to ensure our S/EMs are aligned with our values and operate in full compliance with Cargill's food/feed safety, quality and regulatory requirements.

In 2011, Cargill began deploying one global consistent process for qualifying suppliers and external manufacturers. It is called the Supplier and External Manufacturer Management Process or S/EM Process. A major goal of the process is to enable Cargill to qualify suppliers that are capable of meeting all the requirements of our many business units and reduce redundant requalification by multiple businesses. The current scope of the S/EM Process is food/feed ingredients, food/feed processing aids, food/ feed contact chemicals, food/feed contact packaging and all materials produced on behalf of Cargill by External Manufacturers.

We recognize that processing aids, contact chemicals and contact packaging may not be subject to the same legal and regulatory and global food/feed safety standards as materials consider by Cargill as food/feed ingredients, but these suppliers are still expected to have processes in place to ensure the purity of their production, control contamination risks, manage changes and meet specifications. Specific requirements for processing aids, contact chemicals and



contact packaging suppliers are included in this manual. However it is Cargill's stance that all suppliers should understand the requirements of ingredients suppliers, so that they can better understand our food/feed safety culture. Suppliers of non- ingredient materials who choose to apply food/feed safety standards and best practices to their processes reduce Cargill's overall food/feed safety risk. It is Cargill's desire to partner with S/EMs to share best practices in the areas of food/feed safety, quality, regulatory compliance and continuous improvement.

This manual is designed for use by our S/EMs and provides information on (i) Cargill's food/feed safety, quality and regulatory compliance requirements for S/EMs (the "Cargill S/EM Food Safety Requirements") and (ii) Cargill's food safety, quality and regulatory compliance qualification and management processes for S/EMs ("Cargill's S/EM Qualification and Management Processes").



# I. Requirements for ingredients suppliers, bio-chemical suppliers and external manufacturers

There are three basic components to Cargill's Food/Feed Safety, Quality and Regulatory Requirements: (i) Legal and Regulatory Requirements, (ii) Pre-requisite Programs and HACCP Requirements and (iii) Cargill Specific Requirements. There are also a few additional requirements for External Manufacturers.

### A. LEGAL AND REGULATORY REQUIREMENTS

Cargill requires S/EMs to establish their food/feed safety programs to fully comply with all applicable legal and regulatory requirements. It is each S/EMs obligation to determine, understand and comply with the legal and regulatory requirements that apply to their operations and products both in the country of manufacture and the country of delivery of services and products. If Cargill requires any S/EM to comply with the laws and regulations of any other jurisdiction, Cargill will communicate those additional requirements to the affected manufacturer S/EMs.

### B. PRE-REQUISITE PROGRAMS AND HACCP REQUIREMENTS

Cargill also requires that Suppliers and External Manufacturers to our human and pet food businesses comply with Codex, the international standard for food safety programs, <u>RECOMMENDED INTERNATIONAL CODE OF PRACTICE</u> <u>GENERAL PRINCIPLES OF FOOD HYGIENE CAC/RCP</u> <u>1-1969, Rev. 4-2003 1</u> http://www.codexalimentarius.org.

Suppliers to our animal food/feed businesses must comply with PAS 222, PAS 222:2011 PREREQUISITE PROGRAMMES FOR FOOD SAFETY IN THE MANUFACTURING OF FOOD AND FEED FOR ANIMALS http://shop.bsigroup.com/en/ forms/PASs/PAS-222/.

External Manufacturers to our animal food/feed business must comply with ISO 22000 and PAS 222, ISO 22000:2005 FOOD SAFETY MANAGEMENT SYSTEMS – REQUIREMENTS FOR ANY ORGANIZATION IN THE FOOD CHAIN http://www.iso. org/iso/home/standards/management-standards/iso22000. htm and PAS 222:2011 PREREQUISITE PROGRAMMES FOR FOOD SAFETY IN THE MANUFACTURING OF FOOD AND FEED FOR ANIMALS http://shop.bsigroup.com/en/forms/ PASs/PAS-222/.

### C. CARGILL SPECIFIC REQUIREMENTS

In addition to meeting Legal and Regulatory Requirements and implementation of Pre-requisite Programs and HACCP Requirements, Cargill has identified several additional requirements which S/EMs must also meet.

- Product, Material or Service Specific Requirements: For some products, materials and services, Cargill and Cargill customers have additional requirements. If so, these additional requirements will be separately identified to the S/EM. Examples of this are: identity preservation, non-GMO, Kosher, feed nutritional value requirements as well as others.
- 2. Management Systems: A management system identifies and institutes control of food/feed safety hazards, communicates internally and externally regarding food/ feed safety and ensures continual improvement of the food/feed safety system. Examples include a clearly stated food/feed safety policy, management review and verification of the system, dedicated resources for food/ feed safety, quality and regulatory management, and food/ feed safety training for employees.
- 3. Internally managed audit system: Systems to complete internal audits of their own facilities, as well as systems for monitoring completion of corrective action findings.
- Product Defense: Having measures in place to reduce the chances of intentional contamination of the human food/ animal food/feed supply. Also known as human food/ animal food (feed) defense or human food/animal food (feed) security.

- 5. Food/Feed Grade Inputs: S/EMs must use only food grade inputs or inputs approved for food use in the manufacture of products or materials or the provision of services to Cargill. Food Grade inputs satisfy the pertinent Food Chemical Codex (FCC) standard/specification or some other globally-recognized food standard/specification, are produced under the appropriate prerequisite programs, and comply with any regulatory requirements for food grade for that particular substance in relevant geographies. Exceptions require the approval of Cargill. Feed Grade or Food Grade Inputs may be used for animal feed materials, provided they meet globally recognized feed standards and specifications.
- 6. Food Allergen Control: Systems must exist for the control and prevention of incidental co-mingling of food allergens and to ensure proper labeling of allergens in products (not required for animal food/feed).
- 7. Food/Feed Safety Product Testing (including testing for Adulterants): Product that is tested for any biological, chemical or physical hazard that may render a food or feed product unfit for its intended use may not be shipped until testing is complete and product is determined safe. This definition applies to hazards that are naturallyoccurring, occur through a processing error, or are intentionally added to do harm.
- 8. Good Laboratory Practices: Systems must be in place to ensure reliability of laboratory results for testing done on products or materials manufactured for Cargill. This includes use of recognized test methods, documented procedures, trained and competent technicians, calibrated and maintained equipment.
- 9. Supplier Qualification Program: S/EMs must have in place preventative measures for food/feed safety, regulatory compliance, food/feed defense, and quality management programs for their suppliers. Prevention requires that these features be integrated into the S/EMs procurement processes and requires close interaction with growers, suppliers, manufacturers, distributors, service providers, and importers. All S/EMs must have approval and monitoring programs for their own suppliers which programs, at a minimum, consist of a combination of appropriate programs, specifications, policies and procedures described in this document.

- 10. Line of Sight: S/EMs must develop a system for the identification of the supply chain for each of their products. An example of this might be: An S/EM purchases a material from a broker who sources their material from multiple sources and countries. The S/EM must understand what these sources are as well as what geographies the material came from in order to provide a line of sight when there is a food/feed safety incident.
- 11. Key Process Indicators: may be required for S/EMs.
- 12. Required Documents: S/EMs will be required to provide specific documents to Cargill for qualification and those documents will be required to be updated periodically. When an updated document is requested, suppliers must ensure the document is internally reviewed and newly dated. Cargill stores food/feed safety related documents for no longer than three years and this applies to S/EM documents as well. Generally, S/EMs will be requested to provide annual updates to documents unless otherwise specified.
- 13. Global Food Safety Initiative (GFSI) benchmarked scheme certification for human food or an agreed upon plan with Cargill to achieve certification.
- 14. Allow Cargill to complete a targeted visit to the manufacturing site to better understand risk associated with the site and products manufactured there.

# D. ADDITIONAL REQUIREMENTS FOR EXTERNAL MANUFACTURERS

- 1. External Manufacturers will be required to complete Packaging Graphics Approval with Cargill prior to manufacturing any product and must not change the packaging without prior approval from Cargill.
- 2. Master Manufacturing Records may be created with each External Manufacturer.
- 3. Key Process Indicators will likely be developed with each External Manufacturer.
- 4. Technical and process capabilities may be assessed and improvement programs required.
- Internationally recognized feed safety and quality certification for external manufacturers of animal food/ feed.

# **II. Requirements for Food/Feed Contact Packaging Suppliers**

### A. LEGAL AND REGULATORY REQUIREMENTS

- 1. Suppliers must ensure their products are compliant with both their local food/feed contact packaging material regulations for the intended use of the material as well as those of the intended recipient country.
- 2. Must be prepared to provide proof of compliance with those regulations, including, but not limited to, migration and/or leach-ability testing results with the materials that are intended to be contained in the packaging.

### B. PRE-REQUISITE PROGRAMS, FOOD/FEED SAFETY AND QUALITY REQUIREMENTS

- Their processing plants and systems meet the Publicly Available Standard (PAS) 223:2011 <u>Prerequiste</u> programmes and design requirements for food safety in the manufacture and provision of food packaging from the British Standards Institute. This eventually will become an ISO Technical Standard (ISO-TS xxx) (http://shop.bsigroup.com/en/ProductDetail/ ?pid=00000000030240355 – note PAS must be purchased.)
- 2. Have completed and documented hazard assessment of their process, incoming materials and finished product
- 3. Their processes ensure purity of product by preventing and/or controlling contamination risks.
- 4. Their processes ensure that the packaging material intended to come into contact with food must be sufficiently inert to preclude substances from being transferred to food in quantities large enough to endanger human health or to bring about an unacceptable change in the composition of the food or a deterioration in it's organoleptic properties.
- 5. Their quality management processes includes a process for management of change, which includes customer notification.

6. Their quality management process includes a process for assessing compliance to specifications.

### **C. CARGILL SPECIFIC REQUIREMENTS**

- To assess our supplier's ability to meet the above requirements, Cargill will first administer a "Food Safety" questionnaire. The response to this questionnaire determines what the next steps or due diligence are for Cargill to determine a supplier's ability to demonstrate compliance to the above guidelines. These next steps may be:
  - Provide Cargill with results from a Global Food Safety Initiative (GFSI) benchmarked scheme audit that aligns to PAS 223:2011, including corrective action documentation.
  - Provide Cargill with results from a third party audit that aligns to PAS 223:2011, including corrective action documentation.
  - Allow Cargill to complete a food safety audit to better understand risk associated with the site and products manufactured there.
  - Allow Cargill to complete a targeted visit to the manufacturing site to better understand risk associated with the site and products manufactured there.





# III. Requirements for Food/Feed Contact Chemical and Processing Aid Suppliers

### A. LEGAL AND REGULATORY REQUIREMENTS

1. Their products are compliant with both their local regulations for the intended use of the material as well as those of the intended recipient country.

### B. PRE-REQUISITE PROGRAMS, FOOD/FEED SAFETY AND QUALITY REQUIREMENTS

- Products are compliant with the Food Chemical Codex (FCC) monograph http://www.usp.org/food-ingredients/ food-chemicals-codex
  - a. In cases where a product is not designed to meet this standard an agreed upon specification must be in place between Cargill and the supplier.
- Processing plants meet the FCC General Good Manufacturing Practices (GMP) Guidelines for Food Chemicals http://www.usp.org/food-ingredients/foodchemicals-codex or International Food Additives Council Good Manufacturing Practice and Quality Assurance Guide for Food Additives and GRAS substances http:// www.foodadditives.org/foodsafety.html. (Note to access the requirements at the above links, a subscription or membership may be required.)
- Processes ensure purity of product by preventing and/or controlling contamination risks.
- 4. Articulate contamination risks for their process and product
- 5. Their quality management processes includes a process for management of change, which includes customer notification.
- 6. Quality management process includes a process for assessing compliance to specifications.

### **C. CARGILL SPECIFIC REQUIREMENTS**

- To assess our supplier's ability to meet the above requirements, Cargill will first administer a questionnaire to evaluate systems for managing quality and purity of materials produced by the chemical supplier, as well as any systems in place for managing food safety concerns. The response to this questionnaire determines what the next steps or due diligence are for Cargill to determine a supplier's ability to demonstrate compliance to the above GMP guidelines as well as quality and purity of materials.
- 2. These next steps may be:
  - Provide Cargill with audit summary and corrective action report from an ISO 9001 certification audit.
  - If the material provided is covered in the Global Food Safety Initiative (GFSI) Supply Chain Scope (i.e. enzymes) see Part III Scheme and Scope Elements at following link: http://mygfsi.com/technical-resources/ guidance-document.html, then provide Cargill with results from a Global Food Safety Initiative (GFSI) benchmarked scheme audit, including corrective action documentation.
  - If the material provided is not covered in the GFSI Supply Chain Scope, then provide Cargill with results from a third party GMP audit, including corrective action documentation or an appropriate third party audit that demonstrates supplier's ability to conform to requirements and maintain material purity, manage quality processes and ensure customer satisfaction.
  - Allow Cargill to complete a food safety audit to better understand risk associated with the site and products manufactured there.

# **IV. Qualification of all types of Suppliers and External Manufacturers**

Cargill's initial qualification of S/EMs has four basic components: (i) initial information and document request, audit and/or verification, (ii) pre-qualification corrective action plans, (iii) determination and communication of food/feed safety status and (iv) plant trials.

### A. INITIAL INFORMATION, DOCUMENT REQUEST, AUDIT AND/OR VERIFICATION

Each prospective S/EM must undergo a food/feed safety, quality and/or regulatory compliance review. Use of questionnaires, S/EM documentation, inspection surveys, 3rd party food/feed safety audits and/or certifications (GFSI preferred or internationally recognized feed safety and internationally recognized quality certification, i.e. ISO 9001 for chemical suppliers), Cargill audits, product testing, and review of specification conformance capability are some of the methods that Cargill may utilize to ensure our S/EMs are able to consistently meet the Cargill Food/Feed Safety Requirements.

### **B. PRE-QUALIFICATION CORRECTIVE ACTION PLANS**

If Cargill identifies any failure to comply with Cargill's Food/ Feed Safety Requirements in the initial audit and verification phase, the S/EM must develop a proposed Corrective Action Plan, including timelines for approval by Cargill. Supplier/ External Manufacturer is required to respond in two weeks after receiving the audit with their corrective action plan for any findings with timeline for implementation. Cargill will not approve any Corrective Action Plan that does not result in all Major Non-conformance(s) being corrected within six months. However, Cargill may require that any Non-conformance be corrected in a shorter period of time.



# C. DETERMINATION AND COMMUNICATION OF INITIAL S/EM FOOD/FEED SAFETY STATUS

Cargill will determine and communicate the initial Food/ Feed Safety Status of an S/EM following completion of the initial audit and verification phase and, as appropriate, development and/or implementation of a Corrective Action Plan. Food/Feed Safety Status will be specific to S/EM product(s)/material(s)/service(s), production line(s), and/or plant(s). Note: this determination is of FOOD/FEED SAFETY STATUS ONLY. It does not guarantee the S/EM has actually been or will be awarded business with Cargill. Cargill's Food/Feed Safety Status classifications are: (i) Approved, (ii) Approved with Conditions, (iii) Not Approved and (iv) Disqualified. Use of an S/EM by Cargill will be limited to those that have an acceptable Food/Feed Safety Status for product(s)/material(s)/service(s), production line(s), and/or plant(s).

The descriptions of Cargill's Food/Feed Safety Status classifications follow:

**Approved:** Cargill may use an S/EM who is in "Approved" status. Any Non-conformances must be addressed by a Corrective Action Plan approved by Cargill with verification of completion of corrective action at next planned audit and verification. In the interim, the S/EM must provide documentation of successful implementation of the Corrective Action Plan.

**Approved with Conditions:** Cargill will not use an S/EM who is in "Approved with Conditions" status until: (i) the S/ EM has developed and implemented a Corrective Action Plan approved by Cargill and (ii) Cargill has verified, to its satisfaction, successful completion of the Corrective Action Plan. Not meeting a Correction Action Plan deadline or failing to provide satisfactory evidence of successful completion to corrective action automatically results in an S/EM moving to "Not Approved" status.

**Not Approved:** Cargill will not use an S/EM who is in "Not Approved" status. An S/EM who is in "Not Approved" status and desires to become "Approved" must develop and implement a Corrective Action Plan, approved by Cargill, and Cargill must verify successful completion of the Corrective Action Plan and compliance with Cargill's Food/Feed Safety Requirements through a re-audit.

**Disqualified:** Cargill will not use an S/EM who is in "Disqualified" status. Disqualified status reflects that an S/ EM has severe gaps in its food/feed safety programs. S/EMs who are assigned "Disqualified" status are not allowed to re-apply to supply Cargill for at least one year from the date they are assigned this status and, if they re-apply to supply Cargill, will be required to go through Cargill's most stringent verification process.

### **D. PLANT TRIALS**

If an S/EM is required to complete a plant trial, this requirement will be communicated to the S/EM during the qualification process. A plant trial may not occur in a Cargill or an S/EM facility until the S/EM has been assigned an acceptable Food/Feed Safety Status. The results of a plant trial may or may not change an S/EMs Food/Feed Safety Status.



# V. Management of all types of Suppliers and External Manufacturers

Cargill's ongoing management of S/EMs has five main components: (i) periodic audit and/or verification of compliance, (ii) ongoing monitoring, (iii) triggering event management, (iv) post-qualification Corrective Action Plans and (v) Updates to Food/Feed Safety Status.

# A. PERIODIC AUDIT AND/OR VERIFICATION OF COMPLIANCE

Each S/EM must permit Cargill and its designees (including third party auditors and customers), upon reasonable advance notice, to audit and inspect the facilities used to manufacture Product or Material for Cargill and/or provide Services to Cargill. S/EMs must also permit Cargill to review records and obtain retained samples pertaining to that Product, Material or Service.

### **B. MONITORING PERFORMANCE**

As part of its S/EM program, Cargill will also monitor S/EMs ongoing performance through various means. Cargill will advise each S/EM of those documents and other information it will require for its monitoring from the S/EM. The required documents could change periodically. Monitoring requirements may change from time to time depending on an S/EMs Food/Feed Safety Status, performance, regulatory changes and other factors. Some examples of the type of documentation and other information that may be required are listed below:

- Product Data (e.g., protein, fat, fiber, ash, MDF, moisture, particle size)
- Microbiological testing results
- Contamination testing results
- Monthly reports on Key Performance Indicators
- Third Party Audits
- Product Material Safety Data Sheet
- Complaints and Requests for Reimbursements
- Management of Change records
- Batch records
- Process Control Chart (Target / Range)

### C. TRIGGERING EVENT MANAGEMENT

A "Triggering Event" is an event or circumstance that might cause Cargill to change the Food/Feed Safety Status or another component of its management of one or more S/ EMs. A change to the Food/Feed Safety Status of an S/EM or another component of Cargill's management of an S/EMs may be positive or negative. Examples of triggering events include, but are not limited to, the following:

- Product Retrieval Incidents e.g., Recall, Withdrawal
- Plant, Ingredient or Process Change at the S/EM or Cargill
- Specification Change by S/EM or Cargill
- Industry/Economic/Media Events e.g., melamine
- Change in Regulations or Regulatory Enforcement
- Trends in Key Performance Indicators
- Breach of Supplier Code of Conduct
- Audit Results
- Ownership or Financial Change

### D. POST-QUALIFICATION CORRECTIVE ACTION PLANS

If Cargill identifies any failure to comply with Cargill's Food/ Feed Safety Requirements as a result of a periodic audit and/ or verification, ongoing monitoring or a triggering event, the S/EM must promptly develop a proposed Corrective Action Plan, including timelines for approval by Cargill. Cargill will not approve any Corrective Action Plan that does not result in all Major Non-conformance(s) being corrected within two months and all Minor Non-conformance(s) being corrected within six months. However, Cargill may require that any Non-conformance be corrected in a shorter period of time.

### E. UPDATES TO FOOD/FEED SAFETY STATUS

If the results of a periodic audit and/or verification, ongoing monitoring or a triggering event investigation reflect that an S/EM is not meeting Cargill's Food/Feed Safety Requirements, Cargill has the right to change an S/EMs Food/Feed Safety Status. If the S/EMs Food/Feed Safety Status changes from Approved or Approved with Conditions to Not Approved or Disqualified, Cargill has the right to immediately terminate use of the S/EM and its contract with the S/EM with no liability. If, for any reason, it is appropriate to change the S/EM designation, Cargill will promptly notify S/EM of that change.

### F. MANAGEMENT OF CHANGE

S/EMs must not change the specification, production process, inputs or material without prior notice to and approval by Cargill. Changes such as these can result in significant changes within Cargill's processes, potentially introducing new food/ feed safety issues and will require thorough testing and review prior to acceptance. Cargill should also be notified when S/EMs change legal names or ownership as this may affect our internal documents or documents linked to regulatory requirements.



### VI. Variances

In rare cases, Cargill may permit S/EMs to deviate from one or more of the Cargill Food/Feed Safety Requirements set forth in this manual. Any such deviation must be approved by Cargill, in writing.

### **VII. Glossary of Terms**

### Ingredient

Those materials that directly contact and are part of the mixture of the finished product. The material is usually declared or stated on the label of the finished product as required by government regulations. Examples: parsley, soybean oil, cocoa powder, sucrose, ground beef, glucosamine, sugar, eggs, whey, buttermilk, minerals, amino acids, enzymes.

### **Processing Aid**

Substance(s) added to a human/animal food during its processing and which are removed, consumed by the process, or reduced in some manner before food is packaged in finished form. The substance may or may not be declared on a label depending upon labeling requirements and government regulations.

### Food/Feed Contact Chemical

Substances that are directly added to a human/animal food/feed product during processing and converted to a constituent normally present in the finished product. Can also have a direct functional purpose. Frequently referred to as a chemical or chemical compound.

#### Food/Feed Contact Packaging

Packaging material which directly contacts or touches food/ feed.

### HACCP

Hazard Analysis and Critical Control Point (HACCP) is a system that identifies, evaluates and controls hazards which are significant for food/feed safety.

### GFSI

Global Food Safety Initiative (GFSI) is collaboration between some of the world's leading food/feed safety experts.

### **GFSI Benchmark Scheme Certification**

The GFSI Program provides a framework for a system of independent certification that a supplier's food/feed safety and quality management system complies with international and domestic food/feed safety regulations.

#### Cargill Food/Feed Safety Requirements

There are three basic components to Cargill's Food/Feed Safety, Quality and Regulatory Requirements:

- · Legal and Regulatory Requirements
- Pre-requisite Programs and HACCP Requirements
- Cargill Specific Requirements

There are also a few additional requirements for External Manufacturers.

### Food/Feed Safety Status

Cargill's Food/Feed Safety Status classifications are:

- Approved
- Approved with Conditions
- Not Approved
- Disgualified

Use of an S/EM by Cargill will be limited to those that have an acceptable Food/Feed Safety Status for product(s), material(s), service(s), production line(s), and/or plant(s).

#### **Corrective Action Plan**

Corrective Action is an action taken to eliminate the causes of an existing non-conformity or other undesirable situation. The plan is the set of action items and targeted completion dates that surround corrective action.

### S/EM

Supplier and External Manufacturer

- Supplier includes any provider of goods and services which are used to produce Cargill products.
- An External Manufacturer (EM) is a non-Cargill facility that "processes" and provides a "finished product" that (i) is sold under a Cargill or customer brand and/or (ii) is produced using a Cargill or customer specified process/ recipe/specifications. A vendor who supplies a finished product to Cargill.



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