



SQF Food Safety Audit Edition 9

Cheese Merchants of America - 8881

Summary

Audit Decision

Certified

Certificate Number

8881

Audit Rating

Excellent

Decision Date

April 14, 2026

Audit Type

Recertification

Recertification Date

March 1, 2027

On-Site Audit Dates

March 3, 2026 - March 6, 2026

Expiration Date

May 15, 2027

ICT Dates

-

Issue Date

April 14, 2026

Facility and Scope

Cheese Merchants of America - 8881

1303 Schiferl Road
BARTLETT, IL 60103 United States

Products

(10) Asiago, Cheese, Fontina, Parmesan Cheese, Romano Cheese, Plant-Based Cheese (26) Hard Italian Cheeses

Food Sector Categories

10. Dairy Food Processing
26. Storage and Distribution

Scope of Certification

Receipt of raw material, shredding/grating/cutting, mixing, packaging, storage and distribution of

Certification Body and Audit Team

Mérieux NutriSciences Certification LLC

401 N Michigan Ave
Suite 1400
Chicago, IL 60611 United States

CB#: 40757

Accreditation Body: JASANZ

Accreditation Number: Z3720906AB

Lead Auditor: Juan Carlos Lopez Vazquez (C-460016)

Technical Reviewer: Pavan Basani (C-368555)

Hours Spent on Site: 31

Hours of ICT Activities:

Hours Spent Writing Report: 12

cheeses

Section Responses

Audit Statement - Audit

SQF Practitioner Name - Name the designated SQF Practitioner

Response: Shaun Peterson.

SQF Practitioner Email - Email of the designated SQF Practitioner

Response: speterson@CheeseMerchants.com

Opening Meeting - People Present at the Opening Meeting (Please list names and roles in the following format Name: Role separated by commas)

Response: Shaun Peterson - QA Manager; Roxanne Bossman - Supplier Quality and Compliance Manager; Paul DelleGrazie - Vice President Operations; DeMario Ranson – QA Supervisor; Julio C Ramos – Sanitation Manager; Nick Lampros – Plant Production Manager; Brian Remnes - Manufacturing Manager; Juan Lopez - SQF Auditor.

Facility Description - Auditor Description of Facility (Please provide facility description include # of employees, size, production schedule, general layout, and any additional pertinent details)

Response: Cheese Merchants of America, LLC. is a 280,000 sq. ft. cheese processing facility situated on approximately 10 acres in an industrial park in Bartlett, Illinois. It also has a separate storage and distribution area operating on 12 acres, approximately 275,000 sq. ft. (in the scope of this audit), located at 2595 Enterprise Cir. West Chicago in Illinois, built up in 2020. Both site operates with a workforce of approximately 400 employees across two (2) 12-hour shifts (05:00 – 17:00 – 05:00) from Monday to Friday, supporting continuous production and warehousing operations, with cleaning and sanitation schedules appropriate for the different production needs. Cheese Merchants of America, LLC. processes/package Ready-To-Eat cheese products. The facility layout includes areas for de-boxing, shredding/grating/cutting/mixing of cheese (the processing operation is divided into fresh and dry operations), coolers for storage of cheese products (raw and finished), receiving/shipping bays in both locations, cool dock, employee welfare areas, and office spaces to support 17 production lines. Equipment and product contact surfaces are constructed of Stainless Steel (SS). Floors are constructed of concrete/cement, impervious, smooth and sloped for drainage. Walls & Ceilings are constructed of insulated metal panels. The facility has one (1) Food Safety/Quality plan with one (1) Process Controls or CCP - Foreign Material (unforeseen) after packaging in the Metal Detector and/or the X-Ray scanning and three (3) CQPs or Critical Quality Points. The products covered by the scope were FSC (10) Asiago, Cheese, Fontina, Parmesan Cheese, Romano Cheese, Plant-Based Cheese (26), Hard Italian Cheeses. Receipt of raw material, shredding/grating/cutting, mixing, packaging, storage and distribution of cheeses. There have been no recalls since the previous audit. The previous non-conformance was verified as complete and remained under control. Currently, the site does not produce any products for the specific customer.

Closing Meeting - People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by commas)

Response: Shaun Peterson - QA Manager; Roxanne Bossman - Supplier Quality and Compliance Manager; Paul DelleGrazie - Vice President Operations; DeMario Ranson – QA Supervisor; Julio C Ramos – Sanitation Manager; Nick Lampros – Plant Production Manager; Brian Remnes - Manufacturing Manager; Juan Lopez - SQF Auditor.

Auditor Recommendation - Auditor Recommendation

Response: Re-certification once corrective action is completed.

2.1.1 - Management Responsibility (Mandatory)

2.1.1.1 - Senior site management shall prepare and implement a policy statement that outlines at a minimum the commitment of all site management to: i. Supply safe food; ii. Establish and maintain a food safety culture within the site; iii. Establish and continually improve the site's food safety management system; and iv. Comply with customer and regulatory requirements to supply safe food. The policy statement shall be: v. Signed by the senior site manager and displayed in prominent positions; and vi. Effectively communicated to all site personnel in the language(s) understood by all site personnel

Response: Compliant

2.1.1.2 - Senior site management shall lead and support a food safety culture within the site that ensures at a minimum: i. The establishment, documentation, and communication to all relevant staff of food safety objectives and performance measures; ii. Adequate resources are available to meet food safety objectives; iii. Food safety practices and all applicable requirements of the SQF System are adopted and maintained; iv. Employees are informed and held accountable for their food safety and regulatory responsibilities; v. Employees are positively encouraged and required to notify management about actual or potential food safety issues; and vi. Employees are empowered to act to resolve food safety issues within their scope of work.

Response: Compliant

2.1.1.3 - The reporting structure shall identify and describe site personnel with specific responsibilities for tasks within the food safety management system and identify a backup for the absence of key personnel. Job descriptions for the key personnel shall be documented. Site management shall ensure departments and operations are appropriately staffed and organizationally aligned to meet food safety objectives.

Response: Compliant

2.1.1.4 - Senior site management shall designate a primary and substitute SQF practitioner for each site with responsibility and authority to: i. Oversee the development, implementation, review, and maintenance of the SQF System; ii. Take appropriate action to ensure the integrity of the SQF System; and iii. Communicate to relevant personnel all information essential to ensure the effective implementation and maintenance of the SQF System.

Response: Compliant

2.1.1.5 - The primary and substitute SQF practitioner shall: i. Be employed by the site; ii. Hold a position of responsibility related to the management of the site's SQF System; iii. Have completed a HACCP training course; iv. Be competent to implement and maintain HACCP based food safety plans; and v. Have an understanding of the SQF Food Safety Code: Food Manufacturing and the requirements to implement and maintain an SQF System relevant to the site's scope of certification

Response: Compliant

2.1.1.6 - Senior site management shall ensure the training needs of the site are resourced, implemented, and meet the requirements outlined in system elements 2.9 and that site personnel meet the required competencies to carry out those functions affecting the legality and safety of food products.

Response: Compliant

2.1.1.7 - Senior site management shall ensure the integrity and continued operation of the food safety system in the event of organizational or personnel changes within the company or associated facilities.

Response: Compliant

2.1.1.8 - Senior site management shall designate defined blackout periods that prevent unannounced re-certification audits from occurring out of season or when the site is not operating for legitimate business reasons. The list of blackout dates and their justification shall be submitted to the certification body a minimum of one (1) month before the sixty (60) day re-certification window for the agreed-upon unannounced audit.

Response: Compliant

Summary -

Response: DURING THE ASSESSMENT, THE SITE WAS VERIFIED TO COMPLY WITH CUSTOMER-SPECIFIC REQUIREMENTS. Cheese Merchants of America, LLC. Commitment to Food Safety and Quality is evident in their "Food Safety and Quality Policy" Doc No. 2.1.1.1. The policy statement is posted in the break room, door by production area and shipping warehouse area, and was signed by the company's President, Bob Greco, on January 1, 2026. It is a vital part of their employee training program and a vital feature in the company's Food Safety Culture. The customer complaints, internal & external audits, regulatory inspections, KPIs and employee training are measurement tools for Food Safety culture. The procedure includes job assignments of key management personnel to ensure the SQF System is implemented, monitored and evaluated. The Quality Assurance Manager, Shaun Peterson, serves as the company's primary SQF Practitioner, he is "HACCP Certified" on March 29 and 30 of 2017, "PCQI Certified" on October 14 of 2021, "Foreign Supplier Verification Programs" training on February 15 of 2023, "Mastering SQF, Edition 9: Food Manufacturing" on July 7 of 2023 and is an experienced SQF Practitioner. He is supported by one substitute SQF Practitioner, Roxanne Bossman, Supplier Quality and Compliance Manager, "HACCP Certified" on May 26 - 28 of 2021 and "PCQI Certified" on May 28 of 2021, with administering the SQF Food Safety Systems. The methods used by the company to comply with its clients' expectations, the SQF System and regulatory statutes satisfy this element's requirements. The chain of command for the quality assurance team was depicted on the organizational chart. The company's organization chart, dated March 3 of 2025 (a live document), and Food Safety Manual indicate that the QA/SQF Practitioner is responsible for product Safety and Quality. Job descriptions are in place. The job descriptions include who covers whom in case of absences. The site is aware of the blackout date requirements for unannounced audits. The site has not processed or supplied any finished products since 2024 to "Specific Customer".

2.1.2 - Management Review (Mandatory)

2.1.2.1 - The SQF System shall be reviewed by senior site management at least annually and include: i. Changes to food safety management system documentation (policies, procedures, specifications, food safety plan); ii. Food safety culture performance; iii. Food safety objectives and performance measures; iv. Corrective and preventative actions and trends in findings from internal and external audits, customer complaints, and verification and validation activities; v. Hazard and risk management system; and vi. Follow-up action items from previous management reviews. Records of all management reviews and updates shall be maintained.

Response: Compliant

2.1.2.2 - The SQF practitioner(s) shall update senior site management on at least a monthly basis on matters impacting the implementation and maintenance of the SQF System. The updates and management responses shall be documented.

Response: Compliant

Summary -

Response: There is a management review procedure in place to report on the SQF System performance. "Summary of Management Review" was revised in February 27, 2026 to provide up-to-date instructions for completing annual management reviews. The review included the SQF programs, internal and external audit results, and quality complaints. Monthly meetings are conducted to review and issues of the SQF system. It also includes the corrective actions for the previous year's management review, inspections and audits. All documents and policies related to the SQF System were reviewed on February 17, 2026. The QA Manager/SQF Practitioner meets with senior management regularly to provide management with information on the food safety program. Bi-weekly meetings are conducted to review and issues of the SQF system. The meeting note was reviewed for January 15 and February 19 of 2026. Included were the names of the participants.

2.1.3 - Complaint Management (Mandatory)

2.1.3.1 - The methods and responsibility for handling, investigating, and resolving food safety complaints from commercial customers, consumers, and authorities, arising from products manufactured or handled on-site or co-manufactured, shall be documented and implemented.

Response: Compliant

2.1.3.2 - Adverse trends of customer complaint data shall be investigated and analyzed and the root cause established by personnel knowledgeable about the incidents.

Response: Compliant

2.1.3.3 - Corrective and preventative action shall be implemented based on the seriousness of the incident and the root cause analysis as outlined in 2.5.3. Records of customer complaints, their investigation, and resolution shall be maintained.

Response: Compliant

Summary -

Response: The site's complaint policy is found in the document "SOP- 015 Complaint Management" Version: 05, dated December 1, 2025. It defines the methods and responsibilities for handling customer complaints. The investigation of complaints is handled by the Quality Assurance Management, with corrective actions and records kept of each complaint and resolution. Complaints were entered into a database (Microsoft Teams). After investigating the complaint, quality assurance was responsible for communicating back to the customer. Trend reports were available electronically using a spreadsheet with charting. A corrective action was available for a quality complaint for mold on December 12, 2025 and January 31 & February 11 of 2026. Records of complaints were reviewed. Trending graphs of complaints for the time period 01.01.25 to 12.23.25 were also reviewed. Complaints were closed. The site did not have any food safety related complaints.

2.2.1 - Food Safety Management (Mandatory)

2.2.1.1 - The methods and procedures the site uses to meet the requirements of the SQF Food Safety Code: Food Manufacturing shall be maintained in electronic and/or hard copy documentation. They will be made available to relevant staff and include i. A summary of the organization's food safety policies and the methods it will apply to meet the requirements of this standard; ii. The food safety policy statement and organization chart; iii. The processes and products included in the scope of certification; iv. Food safety regulations that apply to the manufacturing site and the country(ies) of sale (if known); v. Raw material, ingredient, packaging, and finished product specifications; vi. Food safety procedures, prerequisite programs, food safety plans; vii. Process controls that impact product safety; and viii. Other documentation necessary to support the development, implementation,

maintenance, and control of the SQF System.

Response: Compliant

2.2.1.2 - Food safety plans, Good Manufacturing Practices, and all relevant aspects of the SQF System shall be reviewed, updated, and communicated as needed when any changes implemented have an impact on the site's ability to deliver safe food. All changes to food safety plans, Good Manufacturing Practices, and other aspects of the SQF System shall be validated or justified prior to their implementation. The reasons for the change shall be documented.

Response: Compliant

Summary -

Response: The company maintains an up-to-date copy of the food safety management system in electronic form. The entire food safety plan was evaluated on January 14 of 2026, by the food safety team. The manual includes the policy statement, organizational chart, scope of certification, products covered under the scope of certification, food safety procedures and other documents. The team is comprised of 17 members, with the QA Manager/SQF Practitioner leading the team. It meets annually to review the food safety plan and provides meeting minutes to senior management. The QA Manager/SQF Practitioner must review and approve any changes to the SQF System.

2.2.2 Document Control (Mandatory)

2.2.2.1 - The methods and responsibility for maintaining document control and ensuring staff have access to current requirements and instructions shall be documented and implemented. Current SQF System documents and amendments to documents shall be maintained.

Response: Compliant

Summary -

Response: The site has implemented its SOP-026 Version: 06, called "Controls of Documents and Quality Records," reviewed on January 20 of 2026, defining the methods and responsibilities for document control. Documents were found during the audit to be readily accessible and properly stored on the network drive "SOP Register". A current list of all SQF documents is maintained, and documents were observed to be stored securely, accessible and password protected. Documents contained a document name and number, approval, version date, supersedes date and a separate form with a revision history. There is a "Document Registry" available for easy reference of the facility's documentation. Document register contains a list of all policies, procedures and forms under the controlled SQF System. The register was current for the documents reviewed.

2.2.3 - Records (Mandatory)

2.2.3.1 - The methods, frequency, and responsibility for verifying, maintaining, and retaining records shall be documented and implemented.

Response: Compliant

2.2.3.2 - All records shall be legible and confirmed by those undertaking monitoring activities that demonstrate inspections, analyses, and other essential activities that have been completed.

Response: Compliant

2.2.3.3 - Records shall be readily accessible, retrievable, and securely stored to prevent unauthorized access, loss,

damage, and deterioration. Retention periods shall be in accordance with customer, legal, and regulatory requirements, at minimum the product shelf-life or established by the site if no shelf-life exists.

Response: Compliant

Summary -

Response: A Record Retention Policy is in place. The site has implemented its SOP-026 Version: 06, called "Controls of Documents and Quality Records," reviewed on January 20, 2026; defining the methods and responsibilities for document control. Records are retained for five (5) years. The records are required to be legible, dated, with no cross outs, and verified. Records were reviewed for "Label", "Seal", "Residual Oxygen Verification", "Code Date", "Weight", "Moisture %, Salt %, Protein, Fat Dry Milk", "Metal Detector", "ATP Swabs", "Sanitation Records", "Concentration Checks", "Master Sanitation Scheduled - General Housekeeping", "MSS Fresh Production" for March 3, 4 & 5; June 4, 5 & 6, September 15, 16 & 17 of 2025 and January 26, 27 & 28 of 2026. The records were complete, legible, dated and verified.

2.3.1 - Specification, Formulation, and Realization

2.3.1.1 - The methods and responsibility for designing and developing new product formulations and converting product concepts to commercial realization shall be documented and implemented.

Response: Compliant

2.3.1.2 - New product formulations, manufacturing processes, and the fulfillment of product requirements shall be established, validated, and verified by site trials and product testing as required to ensure product safety. Product formulations shall be developed by authorized persons to ensure that they meet the intended use. Where necessary, shelf life trials shall be conducted to validate and verify a new product's: i. Pre-consumer handling and storage requirements, including the establishment of "use by," "best before dates," or equivalent terminology; ii. Microbiological criteria, where applicable; and iii. Consumer preparation, where applicable, and storage and handling requirements.

Response: Compliant

2.3.1.3 - A food safety plan shall be validated and verified by the site food safety team for each new product and its associated process through conversion to commercial production and distribution or where a change to ingredients, process, or packaging occurs that may impact food safety.

Response: Compliant

2.3.1.4 - Product formulations and manufacturing processes for products included in the scope of certification shall be reviewed when there are changes in materials, ingredients, or equipment.

Response: Compliant

2.3.1.5 - The process flows for all new and existing manufacturing processes shall be designed to ensure that product is manufactured according to approved product formulations and to prevent cross-contamination.

Response: Compliant

2.3.1.6 - Records of product design, formulations, label compliance, process flows, shelf life trials, and approvals for all new and existing products shall be maintained.

Response: Compliant

Summary -

Response: A "Product Development" policy is in place. The "SOP-016", Version: 05, reviewed in January 5, 2026; has been implemented defining the methods and responsibilities for commercialization of new products, called "Product Development and Evaluation". This includes products in the scope of certification, when changes in materials, ingredients and equipment are made. Procedures conducted at the facility include checking formulations and processes with production trials, shelf-life trials, product testing and label development to comply with the regulatory requirements. Where necessary, shelf-life trials are conducted to establish "best by" dates, handling & storage requirements with microbiological criteria if required by the customer. The food safety plan is validated and verified for each new product and process by trials and product testing. This review includes changes to distribution and ingredients. No new products have undergone the product formulation and realization process in the previous 12 months.

2.3.2 - Specifications (Raw Material, Packaging, Finished Product, and Services)

2.3.2.1 - The methods and responsibility for developing, managing, and approving raw material, finished product, and packaging specifications shall be documented.

Response: Compliant

2.3.2.2 - Specifications for all raw materials and packaging, including, but not limited to, ingredients, additives, hazardous chemicals, processing aids, and packaging that impact finished product safety shall be documented and kept current.

Response: Compliant

2.3.2.3 - All raw materials, packaging, and ingredients, including those received from other sites under the same corporate ownership, shall comply with specifications and with the relevant legislation in the country of manufacture and country(ies) of destination if known.

Response: Compliant

2.3.2.4 - Raw materials, packaging, and ingredients shall be validated to ensure product safety is not compromised and the material is fit for its intended purpose.

Response: Compliant

2.3.2.5 - Site management shall require approved raw materials suppliers to notify the site of changes in product composition that could have an impact on product formulation (e.g., protein content, moisture, amino acid profiles, contaminant levels, allergens, and/or other parameters that may vary by crop or by season).

Response: Compliant

2.3.2.6 - Verification of packaging shall include a certification of all packaging that comes into direct contact with food meets either regulatory acceptance or approval criteria. Documentation shall either be in the form of a declaration of continued guarantee of compliance, a certificate of conformance, or a certificate from the applicable regulatory agency. In the absence of a certificate of conformance, certificate of analysis, or letter of guarantee, analyses to confirm the absence of potential chemical migration from the packaging to the food contents shall be conducted and records maintained.

Response: Compliant

2.3.2.7 - Finished product labels shall be accurate, comply with the relevant legislation, and be approved by qualified company personnel.

Response: Compliant

2.3.2.8 - Description of services for contract service providers that have an impact on product safety shall be documented, current, include a full description of the services to be provided, and detail relevant training requirements of all contract personnel.

Response: Compliant

2.3.2.9 - Finished product specifications shall be documented, current, approved by the site and its customer, accessible to relevant staff, and shall include, where applicable: i. Microbiological, chemical, and physical limits; ii. Composition to meet label claims; iii. Labeling and packaging requirements; and iv. Storage conditions.

Response: Compliant

2.3.2.10 - Specifications for raw materials and packaging, chemicals, processing aids, contract services, and finished products shall be reviewed as changes occur that impact product safety. Records of reviews shall be maintained. A list of all the above specifications shall be maintained and kept current.

Response: Compliant

Summary -

Response: The Cheese Merchants company has several procedures to ensure cheese products are produced and packaged to the company's specifications. "Raw Materials" provides a method for procuring raw ingredients, additives, processing aids and packaging material. The procedure addresses material specifications, especially for the high-risk/care processing rooms, to ensure that processing operations can produce a safe and legal food cheese product. All incoming materials have defined specifications for use in production. The specifications are detailed and describe compliance requirements for microbiological, chemical, physical and sensory parameters. Suppliers are required to notify "Cheese Merchants" if specifications of the ingredients supplied change. A register of raw ingredients and packaging materials is maintained in the quality system database. Upon receipt of materials, receiving personnel review and verify the certificates of analysis accompanying the shipments and maintain the certificates as controlled documentation. The Purchasing Manager is responsible for procuring ingredients and packaging material. "Finished Product Specification" provides instructions for ensuring cheese products are consistently processed according to predetermined product characteristics. Finished product labels complied with relevant legislation. The labels are approved by the QA Manager/SQF Practitioner, R&D Manager, the customers and reviewed at the plant level. Finished product specifications are maintained. The specifications included the composition standards, microbiological standards, ingredients, packaging and code life, storage information and labeling requirements. A list of specifications is maintained electronically and was current. "CHEESE MERCHANTS OF AMERICA" product specification was reviewed at the time of the audit. The company has a contracted service provider registry, which was revised on March 3 of 2026. A register of contract service providers and specifications are maintained and were current for pest control, chemicals provider and uniform company. The list was verified to be current.

2.3.3 - Contract Manufacturers

2.3.3.1 - The methods and responsibility for ensuring all agreements with contract manufacturers relating to food safety, customer product requirements, their realization, and delivery shall be documented and implemented.

Response: N/A

Evidence: • The site does not use co-manufactures or contracted off site warehouses or DC's at the time of this audit.

2.3.3.2 - The site shall establish a method to determine the food safety risk level of contract manufactured product and shall document the risk. The site shall ensure that: i. Products and processes of co-manufacturers that are considered high-risk have undergone an audit by the site or third-party agency to confirm compliance with the SQF Food Safety Code: Food Manufacturing and regulatory and customer requirements; ii. Products and processes of co-manufacturers that are considered low-risk meet the requirements of the SQF Food Safety Code: Food Manufacturing, or other GFSI benchmarked certification programs, and regulatory and customer requirements; and iii. Changes to contractual agreements are approved by both parties and communicated to relevant personnel.

Response: N/A

Evidence: • The site does not use co-manufactures or contracted off site warehouses or DC's at the time of this audit.

2.3.3.3 - Contractual agreements with third party storage and distribution businesses shall include requirements relating to customer product requirements and compliance with clause 2.3.3.2 of the SQF Food Safety Code: Food Manufacturing. Contractual agreements shall be approved by both parties and communicated to relevant personnel. The site shall verify compliance with the SQF Code and ensure that customer and regulatory requirements are being met at all times.

Response: N/A

Evidence: • The site does not use co-manufactures or contracted off site warehouses or DC's at the time of this audit.

2.3.3.4 - Records of audits, contracts, and changes to contractual agreements and their approvals shall be maintained.

Response: Compliant

Summary -

Response: The site does not use co-manufactures or contracted off site warehouses or DC's at the time of this audit.

2.3.4 - Approved Supplier Program (Mandatory)

2.3.4.1 - The responsibility and procedure for selecting, evaluating, approving, and monitoring an approved supplier shall be documented and implemented. A current record of approved suppliers, receiving inspections, and supplier audits shall be maintained. Code Amendment #2 Approved supplier registers shall include supplier contact details. All approved and emergency suppliers shall be registered.

Response: Compliant

2.3.4.2 - The approved supplier program shall be based on the past performance of a supplier and the risk level of the raw materials, ingredients, processing aids, packaging, and services supplied, and shall contain at a minimum: i. Agreed specifications (refer to 2.3.2); ii. Reference to the level of risk applied to raw materials, ingredients, packaging, and services from the approved supplier; iii. A summary of the food safety controls implemented by the approved supplier; iv. Methods for granting approved supplier status; v. Methods and frequency of monitoring approved suppliers; vi. Details of the certificates of conformance, if required; and vii. Methods and frequency of reviewing approved supplier performance and status.

Response: Compliant

2.3.4.3 - Verification of raw materials shall include certificates of conformance, certificates of analysis, or sampling,

and testing. The verification frequency shall be identified by the site.

Response: Compliant

2.3.4.4 - The receipt of raw materials, ingredients, processing aids, and packaging from nonapproved suppliers shall be acceptable only in an emergency situation and provided a receiving inspection or analysis is conducted and recorded before use.

Response: Compliant

2.3.4.5 - Raw materials, ingredients, and packaging received from other sites under the same corporate ownership shall be subject to the same specification requirements (refer to 2.3.2), approved supplier requirements, and receiving inspections as all other material providers.

Response: Compliant

2.3.4.6 - Supplier audits shall be based on risk (as determined in 2.3.4.2) and shall be conducted by individuals knowledgeable of applicable regulatory and food safety requirements and trained in auditing techniques.

Response: Compliant

Summary -

Response: The company's "Supplier Approval Program" SOP-002, Version: 05 dated October 21, 2025; details the criteria used to qualify suppliers of raw ingredients, packaging materials, cleaning chemicals and other supplies. Per procedure, all approved suppliers must have a GFSI certification. Each approved supplier must submit certificates of analysis and letters of guarantee with each shipment. Suppliers of packaging materials must provide evidence of an audit and a letter of guarantee. The SQF Practitioners have the authority to approve all suppliers. All ingredients are assessed for risks in the Food Safety Plan. "Approved Suppliers List" is an up-to-date register of approved suppliers, which is controlled by the Supplier Quality and Compliance Manager/substitute SQF Practitioner. Verification of ingredients is with COA's, testing and letters of guarantee. Ingredients and raw materials cannot be received from unapproved suppliers. The facility has 33 approved suppliers that reapply each year by submitting the requested documents. A BRCS certificate expiring on February 26 of 2027 was available for "Mullins Cheese" a cheese supplier company. A SQFI certificate expiring on January 6 of 2027 was available for "Airlite Plastic Company Inc." a packaging material supplier. A FSSC 22000 certificate expiring on June 8 of 2028 was available for "Sweetener Supply Co." an ingredient (salt) supplier. Site complies with customer specific requirements.

2.4.1 - Food Legislation (Mandatory)

2.4.1.1 - The site shall ensure that at the time of delivery to customers finished products shall comply with food safety legislation applicable in the country of manufacture and sale. This includes compliance with legislative requirements applicable to maximum residue limits, food safety, packaging, product description, net weights, nutritional, allergen, and additive labeling, labeling of identity preserved foods, any other criteria listed under food legislation, and to relevant established industry codes of practice.

Response: Compliant

2.4.1.2 - The methods and responsibility for ensuring the site is kept informed of changes to relevant legislation, scientific and technical developments, emerging food safety issues, and relevant industry codes of practice shall be documented and implemented.

Response: Compliant

2.4.1.3 - SQFI and the certification body shall be notified in writing within twenty-four (24) hours as a result of a regulatory warning or event. Notification to SQFI shall be by email to foodsafetycrisis@sqfi.com.

Response: Compliant

Summary -

Response: The Illinois Department of Health has direct oversight of the facilities and conducts annual inspections of the cheese processing operations. The sites has ensured that products delivered to its customers comply with regulatory requirements in the country of use. The facilities has a current "Dairy Food registration No. 17-522", expires on December 31 of 2026, with the Illinois Department of Health, and FDA Registration No. ***** 1714 - CMA (last four digits) and FDA Registration No. ***** 4844 - WC (las four digits) which expire on December 31 of 2026. Regulatory compliance for this operation includes food safety requirements, allergen content, additive labeling and nutritional labeling. The site keeps updated about changes in relevant legislation, technical developments and industry codes of practice in their specific industry, by means of a member of trade association (International Dairy Foods Association), websites (FDA and SQFI). The SQF Practitioners are responsible to be well informed of scientific and technical developments, industry codes of practice and relevant legislation. The site has a written provision that the certification body "Merieux NutriSciences, LLC.", and SQFI will be notified within 24 hours in the event of a regulatory warning or event. Site complies with customer specific requirements.

2.4.2 - Good Production Practices (Mandatory)

2.4.2.1 - The site shall ensure the applicable Good Manufacturing Practices described in Module 11 of this Food Safety Code are applied or exempted according to a written risk analysis outlining the justification for exemption or evidence of the effectiveness of alternative control measures that ensure food safety is not compromised.

Response: Compliant

2.4.2.2 - The Good Manufacturing Practices applicable to the scope of certification outlining how food safety is controlled and assured shall be documented and implemented.

Response: Compliant

Summary -

Response: The property, building and equipment are located, constructed and designed to allow food products to be manufactured in a safe hygienic manner. There are no adjacent operations or neighboring businesses that could be considered nuisances to Cheese Merchants Company. Employees receive on-going training in good manufacturing practices. On-site observations revealed facility is upholding its GMP policy. There is a master list of pre-requisite programs that serve as preventive control measures. The pre-requisite programs are verified by monthly internal audits. GMPs include visitor and service contractor programs, personal and plant hygiene.

2.4.3 - Food Safety Plan (Mandatory)

2.4.3.1 - A food safety plan shall be prepared in accordance with the twelve steps identified in the Codex Alimentarius Commission HACCP guidelines. The food safety plan shall be effectively implemented and maintained and shall outline how the site controls and assures food safety of the products or product groups included in the scope of the SQF certification and their associated processes. More than one HACCP food safety plan may be required to cover all products included in the scope of certification.

Response: Compliant

2.4.3.2 - The food safety plan or plans shall be developed and maintained by a multidisciplinary team that includes the SQF practitioner and those site personnel with technical, production, and engineering knowledge of the relevant raw materials, packaging, processing aids, products, and associated processes. Where the relevant expertise is not available on-site, advice may be obtained from other sources to assist the food safety team.

Response: Compliant

2.4.3.3 - The scope of each food safety plan shall be developed and documented including the start and endpoints of the processes under consideration and all relevant inputs and outputs.

Response: Compliant

2.4.3.4 - Product descriptions shall be developed and documented for all products included in the scope of the food safety plans. The descriptions shall reference the finished product specifications (refer to 2.3.2.9) plus any additional information relevant to product safety, such as pH, water activity, composition, and/or storage conditions.

Response: Compliant

2.4.3.5 - The intended use of each product shall be determined and documented by the food safety team. This shall include target consumer groups, the potential for consumption by vulnerable groups of the population, requirements for further processing if applicable, and potential alternative uses of the product.

Response: Compliant

2.4.3.6 - The food safety team shall develop and document a flow diagram covering the scope of each food safety plan. The flow diagram shall include every step in the process, all raw materials, packaging, service inputs (e.g., water, steam, gasses as applicable), scheduled process delays, and all process outputs including waste and rework. Each flow diagram shall be confirmed by the food safety team to cover all stages and hours of operation.

Response: Compliant

2.4.3.7 - The food safety team shall identify and document all food safety hazards that can reasonably be expected to occur at each step in the processes, including raw materials and other inputs.

Response: Compliant

2.4.3.8 - The food safety team shall conduct a hazard analysis for every identified hazard to determine which hazards are significant, i.e., their elimination or reduction to an acceptable level is necessary to control food safety. The methodology for determining hazard significance shall be documented and used consistently to assess all potential hazards.

Response: Compliant

2.4.3.9 - The food safety team shall determine and document the control measures that must be applied to all significant hazards. More than one control measure may be required to control an identified hazard, and more than one significant hazard may be controlled by a specific control measure.

Response: Compliant

2.4.3.10 - Based on the results of the hazard analysis (refer to 2.4.3.8), the food safety team shall identify the steps in the process where control must be applied to eliminate a significant hazard or reduce it to an acceptable level (i.e., a critical control point or CCP). In instances where a significant hazard has been identified at a step in the process, but no control measure exists, the food safety team shall modify the process to include an appropriate

control measure.

Response: Compliant

2.4.3.11 - For each identified CCP, the food safety team shall identify and document the limits that separate safe from unsafe product (critical limits). The food safety team shall validate all of the critical limits to ensure the level of control of the identified food safety hazard(s) and that all critical limits and control measures individually or in combination effectively provide the level of control required (refer to 2.5.2.1).

Response: Compliant

2.4.3.12 - The food safety team shall develop and document procedures to monitor CCPs to ensure they remain within the established limits (refer to 2.4.3.11). Monitoring procedures shall identify the personnel assigned to conduct monitoring, the sampling and test methods, and the test frequency.

Response: Compliant

2.4.3.13 - The food safety team shall develop and document deviation procedures that identify the disposition of affected product when monitoring indicates a loss of control at a CCP. The procedures shall also prescribe actions to correct the process step to prevent recurrence of the safety failure.

Response: Compliant

2.4.3.14 - The documented and approved food safety plan(s) shall be implemented in full. The effective implementation shall be monitored by the food safety team, and a full review of the documented and implemented plans shall be conducted at least annually, or when changes to the process, equipment, inputs, or other changes affecting product safety occur.

Response: Compliant

2.4.3.15 - Procedures shall be in place to verify that critical control points are effectively monitored and appropriate corrective actions are applied. Implemented food safety plans shall be verified as part of SQF System verification (refer to 2.5).

Response: Compliant

2.4.3.16 - Critical control point monitoring, corrective action, and verification records shall be maintained and appropriately used.

Response: Compliant

2.4.3.17 - Where food safety regulations in the country of production and destination (if known) prescribe a food safety control methodology other than the Codex Alimentarius Commission HACCP guidelines, the food safety team shall implement food safety plans that meet both Codex and food regulatory requirements.

Response: Compliant

Summary -

Response: The facility has one (1) Food Safety Plan. The food safety team consists of 17 members from different job functions in the plant. The QA Manager/SQF Practitioner is the team lead. The facility's "Quality and Food Safety Plan" was revised on January 14, 2026; to sufficiently describe how the company intends to process and package cheese products. The HACCP plan was written in accordance with the Codex of Alimentarius guidelines. One flow diagram was reviewed, which included receiving items at the processing facility, receiving finished products and mixing ingredients. The flow diagram included every step in the process. The Food Safety team conduct a hazard analysis for all processes, and bases on the hazard analysis

finding the team has concluded that the hazards were microbiological, physical, chemical; however, the most hazard of concern was the physical hazard. One (1) hazard, physical (foreign material-unforeseen) was identified on the Hazard Analysis in addition to numerous preventive controls for pre-requisite programs. Critical control point has been implemented to control the identified physical hazard. The company has established critical limits for the critical control point and corrective actions. The metal detector is monitored at the beginning of each shift, every two hours, at the end of the shift, and after any repairs or adjustments. If the metal detector is out of compliance, it must be repaired by maintenance. The line can continue to run, but all products must be passed through a metal detector before release. If a metal detector checks fails, all products must be retested since the last good check. All finished products are monitored for foreign Material - unforeseen which is Critical Control Point (CCP) or Process Control (PC) No. 1. Metal detection/X-ray is conducted immediately after packaging the dry cheese. Checks are performed at startup and every 2 hours during processing. All Metal Detector/X-Ray checks are documented through "Redzone". The CCP checks in "RedZone" are verified by the next shift. The "Metal Detector/X-Ray Policy SOP No. 007" instructs employees on the operation of the metal detector/X-ray. Records are maintained on the "Electronic Metal Detector Check Log (Redzone)." Process Control or CCP No. 1 is: Fe - 3.0 mm, Non Fe - 3.5 mm and Stainless Steel - 4.5 mm and/or for X-Ray are: Stainless Steel - 1.5 mm and Glass - 2.0 mm and 1.5 mm Stainless steel & 2.0 mm Soda - Lime-Glass for customer specific. The device is tested by a trained employee. Check are performed at the start of production each shift (\pm 30 minutes), every two (2) hours (\pm 15 minutes). Product descriptions with target consumer groups are defined in the "Product Description". There are product descriptions for every product processed/packaged at Cheese Merchants of America. Records were reviewed for: March 3, 4 & 5; June 4, 5 & 6, September 15, 16 & 17, 2025 and January 26, 27 & 28, 2026. The Metal Detectors and X-Ray limits and reading records were correct according to the Food Safety plan.

2.4.4 - Product Sampling, Inspection, and Analysis

2.4.4.1 - The methods, responsibility, and criteria for sampling, inspecting, and/or analyzing raw materials, work-in-progress, and finished product shall be documented and implemented. The methods applied shall ensure that inspections and analyses are completed at regular intervals as required and to agreed specifications and legal requirements. Sampling and testing shall be representative of the process batch and ensure that process controls are maintained to meet specification and formulation.

Response: Compliant

2.4.4.2 - Product analyses shall be conducted to nationally recognized methods or company requirements, or alternative methods that are validated as equivalent to the nationally recognized methods. Where internal laboratories are used to conduct input, environmental, or product analyses, sampling and testing methods shall be in accordance with the applicable requirements of ISO/IEC 17025, including annual proficiency testing for staff conducting analyses. External laboratories shall be accredited to ISO/IEC 17025, or an equivalent international standard, and included on the site's contract service specifications list (refer to 2.3.2.11).

Response: Compliant

2.4.4.3 - On-site laboratories conducting chemical and microbiological analyses that may pose a risk to product safety shall be located separate from any food processing or handling activity and designed to limit access only to authorized personnel. Signage shall be displayed identifying the laboratory area as a restricted area, accessible only by authorized personnel.

Response: Compliant

2.4.4.4 - Provisions shall be made to isolate and contain all hazardous laboratory waste held on the premises and

manage it separately from food waste. Laboratory waste outlets shall at a minimum be downstream of drains that service food processing and handling areas.

Response: Compliant

2.4.4.5 - Retention samples, if required by customers or regulations, shall be stored according to the typical storage conditions for the product and maintained for the stated shelf-life of the product.

Response: Compliant

2.4.4.6 - Records of all inspections and analyses shall be maintained.

Response: Compliant

Summary -

Response: The site's procedures and criteria for sampling, inspecting and analyzing raw materials, work-in-progress and finished product have been documented and implemented in "Product Sampling, Inspection, and Analysis" SOP-009 Version: 09 dated September 30, 2025. The program includes the requirement that samples tested are representative of the process batch. This facility does not have an on-site laboratory. Leak testing for finished products and weight checks are conducted online by operators. The seal check procedure is documented in "SOP-062" Version: 03, dated March 4, 2025. All product checks are documented in Redzone. Line operators are responsible for checking and recording lot codes, cellulose dispensing, residual oxygen, seal checks, and weight checks. RedZone utilizes input data from product checks to generate trending and KPIs tracking. External laboratories used by the site, to conduct food safety related testing, are required to be accredited to ISO/IEC 17025 or equivalent standard. "Certified Laboratories the Midwest" with accreditation valid until November 30 of 2026. Certificates of Analysis are required for material received into this facility. Retention samples are stored at appropriate storage temperatures and kept until the end of the products shelf life. Product evaluation and testing records were reviewed for "Domestic Parmesan Cheese" (E. coli <10 FCU/mL, Heterofermentative Lactobacilli < 3.0 MPN/g, Listeria Spp. Neg./25g, Salmonella Neg./25g, Yeast < 10CFU/mL, Fat on Dry Basis, Fat, Vacuum Drying Moisture and Salt) in December 7 of 2025 from "Certified Laboratories the Midwest". Currently, the site does not produce any products for the specific customer Site complies with customer specific requirements.

2.4.5 - Non-conforming Materials and Product

2.4.5.1 - The responsibility and methods outlining how to handle non-conforming product, raw material, ingredient, work-in-progress, or packaging, which is detected during receipt, storage, processing, handling, or delivery, shall be documented and implemented. The methods applied shall ensure i. Non-conforming product is quarantined, identified, handled, and/or disposed of in a manner that minimizes the risk of inadvertent use, improper use, or risk to the integrity of finished product; and ii. All relevant personnel are aware of the organization's quarantine and release requirements applicable to product placed under quarantine status.

Response: Compliant

2.4.5.2 - Quarantine records and records of the handling, corrective action, or disposal of nonconforming materials or product shall be maintained.

Response: Compliant

Summary -

Response: The Nonconforming Product, Packaging, Equipment, and Hold Release provides guidance for addressing nonconforming equipment and nonconforming product issues. The QA Manger/SQF Practitioner

oversees the implementation and monitoring of the program. The disposition of the product is documented on the hold logs according to the "Non-Conforming Product, Equipment, Hold and Release" SOP-021, Version: 04, dated June 13, 2025." QA reviews and places the product or ingredient on hold in "Microsoft Teams". Hold tags forms are placed on the pallets. The hold log is maintained in "Microsoft Teams". Records reviewed for January 13 thru February 26 of 2026 were complete. Cheese Merchants "Hold Log" was reviewed and found acceptable for addressing root cause and corrective actions. Per "Product Release," only the QA Manager/SQF Practitioner and the Supplier Quality and Compliance Manager/substitute SQF Practitioner have the authority to release products from hold.

2.4.6 - Product Rework

2.4.6.1 - The responsibility and methods outlining how ingredients, packaging, or products are reworked shall be documented and implemented. The methods applied shall ensure: i. Reworking operations are overseen by qualified personnel; ii. Reworked product is clearly identified and traceable; iii. Reworked product is processed in accordance with the site's food safety plan; iv. Each batch of reworked product is inspected or analyzed as required before release; v. Inspections and analyses conform to the requirements outlined in element 2.4.4.1; vi. Release of reworked product conforms to element 2.4.7; and vii. Reworked product does not affect the safety or integrity of the finished product. Records of all reworking operations shall be maintained.

Response: Compliant

Summary -

Response: The "Product rework" policy SOP-027 Version: 04, dated January 5, 2026; outlined the methods and responsibility for the rework process. Cheese can only be reworked if all specifications are maintained. Downgraded cheese is disposed of. Rework cannot be expired and must have enough shelf life to meet the shelf life of the final batch. Only cheese grated, shredded, or shaved can be reworked. Rework inventory is managed by the inventory control team. The rework list is updated on Fridays and shared with QA and production. Rework categories include fresh, dry, approved to sell, and discard. Rework can only be added at < 20% of the overall recipe. Rework cheese must be traceable as per SOP-011, Version: 07 dated March 24, 2025 "Recall Program". The log shows the original lot number and the re-classed new lot number and amount used. Inventory control assigned lot numbers to approved cheese rework. "Item Ledger Entries" rework log was reviewed for products reworked of March 2 and 3 and was deemed acceptable.

2.4.7 - Product Release (Mandatory)

2.4.7.1 - The responsibility and methods for releasing products shall be documented and implemented. The methods applied shall ensure the product is released by authorized personnel, and only after all inspections and analyses are successfully completed and documented to verify legislative and other established food safety controls have been met. Records of all product releases shall be maintained.

Response: Compliant

2.4.7.2 - Product release shall include a procedure to confirm that product labels comply with the food legislation that applies in the country of manufacture and the country(ies) of use or sale if known (refer to 2.4.1.1). If product is packaged and distributed in bulk or unlabeled, product information shall be made available to inform customers and/or consumers of the requirements for its safe use.

Response: Compliant

2.4.7.3 - In the event that the site uses positive release based on product pathogen or chemical testing, a

procedure shall be in place to ensure that product is not released until acceptable results have been received. In the event that off-site or contract warehouses are used, these requirements shall be effectively communicated and verified as being followed.

Response: Compliant

Summary -

Response: The site has written procedure "Product Release" SOP-09, Version: 09 dated September 30, 2025"; implemented for releasing finished products. These release procedures include ensuring that all product inspections and analyses have been verified and documented by authorized personnel to show that all food safety and quality controls have been met. Product must pass in process and quality checks including CQPs checks. Positive release is used for some products. The product is not released in "THEHIVE" (electronic system) until all testing has been completed and the results are in specification. Product labels have been verified to ensure legislative compliance. Records of release are maintained electronically. A review of records for product releases for March 3, 4 & 5; June 4, 5 & 6, September 15, 16 & 17 of 2025 and January 26, 27 & 28 of 2026, showed they had been conducted per procedure.

2.4.8 - Environmental Monitoring

2.4.8.1 - A risk-based environmental monitoring program shall be in place for all food manufacturing processes and immediate surrounding areas, which impact manufacturing processes. The responsibility and methods for the environmental monitoring program shall be documented and implemented.

Response: Compliant

2.4.8.2 - An environmental sampling and testing schedule shall be prepared. It shall at a minimum: i. Detail the applicable pathogens or indicator organisms to test for in that industry; ii. List the number of samples to be taken and the frequency of sampling; iii. Outline the locations in which samples are to be taken and the rotation of locations as needed; and iv. Describe the methods to handle elevated or undesirable results.

Response: Compliant

2.4.8.3 - Environmental testing results shall be monitored, tracked, and trended, and preventative actions (refer to 2.5.3.1) shall be implemented where unsatisfactory results or trends are observed.

Response: Compliant

Summary -

Response: An "Environmental Monitoring Program" SOP-006, Version: 11, dated September 15, 2025; is in place. Risk-based environmental samples are collected from random but specified non-food contact surfaces and nearby equipment, including floors and drains, representing Zones 2, 3 and 4. Sponge samples are submitted to "Certified Laboratories Mid-West" in Aurora, IL. and assayed using BAM and AOAC methodology. The site swabs for LISTERIA and for SALMONELLA. At least one sample of the drain is collected each week, but in different areas, yielding a total of 36 environmental samples. For a presumptive positive, the area is to be swabbed in duplicate within 72 hrs. If the retest is positive, the retest will be done in duplicate and will continue for the next three (3) weeks. If there are out of specification results, the area is re-cleaned and re-swabbed. Vector swabbing is also conducted. Results are maintained and tracked. Records for February 3, 11, 17 & 25 of 2026 were in compliance. A review of lab records indicates that all finished products are free of pathogenic organisms, which verifies the cleanliness of the processing/packaging room's environment.

2.5.1 - Validation and Effectiveness (Mandatory)

2.5.1.1 - The methods, responsibility, and criteria for ensuring the effectiveness of all applicable elements of the SQF Program shall be documented and implemented. The methods applied shall validate that: i. Good Manufacturing Practices are confirmed to ensure they achieve the required results; ii. Critical food safety limits are reviewed annually and re-validated or justified by regulatory standards when changes occur; and iii. Changes to the processes or procedures are assessed to ensure the controls are still effective. Records of all validation activities shall be maintained.

Response: Compliant

Summary -

Response: A Verification and Validation Schedule is in place. The schedule was updated on February 18, 2026. The methods, responsibilities and criteria for ensuring the effectiveness of Good Manufacturing Practices, Critical Food Safety Limits and all other applicable elements of the SQF System have been documented and implemented. These methods are documented and have been found to ensure that each has been implemented effectively. Methods to ensure that procedure or process changes are still effective in controlling food safety are in place and documented in Validation and Effectiveness. Critical food safety limits are re-validated at least annually by the annual Food Safety and Quality Plan Team review/reassessment. CCP's were validated on January 14 of 2026. Records of all verifications of effectiveness and validations are maintained by the, Quality Assurance Manager/SQF Practitioner.

2.5.2 - Verification Activities (Mandatory)

2.5.2.1 - The methods, responsibility, and criteria for verifying monitoring of Good Manufacturing Practices, critical control points, and other food safety controls, and the legality of certified products shall be documented and implemented. The methods applied shall ensure that personnel with responsibility for verifying monitoring activities authorize each verified record.

Response: Compliant

2.5.2.2 - A verification schedule outlining the verification activities, their frequency of completion, and the person responsible for each activity shall be prepared and implemented. Records of verification of activities shall be maintained.

Response: Compliant

Summary -

Response: According to "Verification Activities, SOP-Register" dated February 18, 2026; the QA Manager/SQF Practitioner along with the quality assurance team shall ensure that the methods/criteria for verifying production worksheets, cleaning and sanitation records, good manufacturing practices, equipment calibrations, mock recalls, food security, internal audits and preventive controls satisfy their intended purposes. The procedure cites who, where, when, actions, references and records are defined in written format and communicated to the quality assurance team. Verifications were reviewed for the CCP's for March 3, 4 & 5; June 4, 5 & 6, September 15, 16 & 17 of 2025 and January 26, 27 & 28 of 2026. The records were complete and verified. Sanitation is verified with ATP swabs. GMP's are verified during the monthly audits. Records for all other verifications were in place. A review of verification records indicates the facility has completed its verification program.

2.5.3 - Corrective and Preventative Action (Mandatory)

2.5.3.1 - The responsibility and methods outlining how corrective and preventative actions are determined, implemented, and verified, including the identification of the root cause and resolution of non-compliance of critical food safety limits and deviations from food safety requirements, shall be documented and implemented. Deviations from food safety requirements may include customer complaints, nonconformances raised at internal or external audits and inspections, non-conforming product and equipment, withdrawals and recalls, as appropriate.

Response: Compliant

2.5.3.2 - Records of all investigation, root cause analysis, and resolution of non-conformities, their corrections, and the implementation of preventative actions shall be maintained.

Response: Compliant

Summary -

Response: The facility's "Corrective Action Procedure" "SOP-022 Version: 06 dated February 6, 2026"; provides guidance regarding how corrective actions are investigated, resolved, managed, controlled and recorded. Corrective and preventive actions are generated when deviations are identified during processing procedures, internal audits, regulatory audits (Illinois Department of Public Health on November 13 of 2025 – Not observations were identified during the regulatory inspection) and third party (SQF) audits. A "Microsoft Teams" CAPA form was reviewed for February 5, 2026. The incident was "Wrong Lid". The reason for the failure was that the previous lids were not removed during the product changeover. Records for all other CA are maintained. Root cause analysis and completion of corrective and preventive actions are supervised by the QA Manager/SQF Practitioner.

2.5.4 - Internal Audits and Inspections (Mandatory)

2.5.4.1 - The methods and responsibility for scheduling and conducting internal audits to verify the effectiveness of the SQF System shall be documented and implemented. Internal audits shall be conducted in full and at least annually. The methods applied shall ensure: i. All applicable requirements of the SQF Food Safety Code: Food Manufacturing are audited per the SQF audit checklist or a similar tool; ii. Objective evidence is recorded to verify compliance and/or non-compliance; iii. Corrective and preventative actions of deficiencies identified during the internal audits are undertaken; and iv. Audit results are communicated to relevant management personnel and staff responsible for implementing and verifying corrective and preventative actions.

Response: Compliant

2.5.4.2 - Staff conducting internal audits shall be trained and competent in internal audit procedures. Where practical, staff conducting internal audits shall be independent of the function being audited.

Response: Compliant

2.5.4.3 - Regular inspections of the site and equipment shall be planned and carried out to verify Good Manufacturing Practices and facility and equipment maintenance are compliant to the SQF Food Safety Code: Food Manufacturing. The site shall: i. Take corrections or corrective and preventative action; and ii. Maintain records of inspections and any corrective actions taken.

Response: Compliant

2.5.4.4 - Records of internal audits and inspections and any corrective and preventative actions taken as a result of

internal audits shall be recorded as per 2.5.3.Changes implemented from internal audits that have an impact on the site's ability to deliver safe food shall require a review of applicable aspects of the SQF System (refer to 2.3.1.3).

Response: Compliant

Summary -

Response: The site's procedure for scheduling and conducting internal audits to assess the effectiveness of the SQF system has been documented and implemented per document 2.5.4 Internal Audit and Inspections. The Internal Audit Program is maintained by the Quality Assurance Manager. The Internal audit for SQF System Elements, Module 2, 11 & Quality Code, was conducted by the SQF Practitioner in January 6 of 2026. Facility and equipment inspections are conducted regularly to ensure Good Manufacturing Practices are followed, which is documented in the Monthly Site GMP/Internal Audit Log as per "Internal Audit SOP-018, Version: 07, dated January 12, 2026. All applicable SQF Code requirements, using the SQF checklist or a similar tool, are part of the internal audit program. The frequency of the audits is communicated to management. The Quality Assurance Manager/SQF Partitioner, is responsible for seeing that corrective actions are implemented and verified. Personnel conducting audits have been properly trained on February 25, 2026' and the employees conducting the audits are independent of the functions being audited. Records of internal audits in the facility conducted on January 26, and February 27 of 2026 were sampled and reviewed during the audit. Non-conformances were documented. They were either corrected at the time of the audit or it was assigned with a completion date.

2.6.1 - Product Identification (Mandatory)

2.6.1.1 - The methods and responsibility for identifying raw materials, ingredients, packaging, work-in-progress, process inputs, and finished products during all stages of production and storage shall be documented and implemented to ensure: i. Raw materials, ingredients, packaging, work-in-progress, process inputs, and finished products are clearly identified during all stages of receipt, production, storage, and dispatch; and ii. Finished product is labeled to the customer specification and/or regulatory requirements.

Response: Compliant

2.6.1.2 - Product start-up, product changeover, and packaging changeover (including label changes) procedures shall be documented and implemented to ensure that the correct product is in the correct package and with the correct label and that the changeover is inspected and approved by an authorized person. Procedures shall be implemented to ensure that label use is reconciled, and any inconsistencies investigated and resolved. Product changeover and label reconciliation records shall be maintained.

Response: Compliant

Summary -

Response: There is a written product identification program in place according to the company's "Product Identification" procedure to ensure all products are properly identified. Each product has a unique product identification number assigned by product name, "Best If Used By", date/time packaged and line No. The unique ID No. follows the product throughout all steps in the production process. Finished product was labeled per customer requirements. If the cycle count for labels is not correct an investigation will be conducted. All raw ingredients are assigned lot numbers upon receipt and tracked by the inventory system. The operational staff is well-trained and experienced with the company's product identification system. Records were reviewed for March 3, 4 & 5; June 4, 5 & 6, September 15, 16 & 17 of 2025 and January 26, 27 & 28 of 2026. The records were complete and verified.

2.6.2 - Product Trace (Mandatory)

2.6.2.1 - The responsibility and methods used to trace product shall be documented and implemented to ensure: i. Finished product is traceable at least one step forward to the customer and at least one step back from the process to the manufacturing supplier; ii. The receipt dates of raw materials, ingredients, food contact packaging and materials, and other inputs are recorded (refer to 2.8.1.8 for traceback of allergen containing food products.); iii. Traceability is maintained where product is reworked (refer to 2.4.6); and iv. The effectiveness of the product trace system is reviewed at least annually, as part of the product recall and withdrawal review (refer to 2.6.3.2). Records of raw and packaging material receipt and use and finished product dispatch and destination shall be maintained.

Response: Compliant

Summary -

Response: A Mock recall policy is in place. The "Recall & Recovery Plan" Doc No. SOP-011, Version 07 was updated on March 24, 2025. A trace exercise was conducted during the audit for: Product Name: "Shredded Fontina 4/5 # Bags"; produced on December 15 of 2025. The site produced 40 cases (one pallet). The product was shipped to one customer in December 29 of 2025 to a DC's in MI. 100% of the product was recovery. The "Cheese" used was received on September 10, 2025 from "MULLINS CHEESE" (37 blocks). The films used were received on December 1 of 2025 from "CRYOVAC" (Sealed Air). Records reviewed were complete. The trace lasted 01:15 hours.

2.6.3 - Product Withdrawal and Recall (Mandatory)

2.6.3.1 - The responsibility and methods used to withdraw or recall product shall be documented and implemented. The procedure shall: i. Identify those responsible for initiating, managing, and investigating a product withdrawal or recall; ii. Describe the management procedures to be implemented, including sources of legal, regulatory, and expert advice, and essential traceability information; iii. Outline a communication plan to inform site personnel, customers, consumers, authorities, and other essential bodies in a timely manner appropriate about the nature of the incident; and iv. Ensure that SQFI, the certification body, and the appropriate regulatory authority are listed as essential organizations and notified in instances of a food safety incident of a public nature or product recall for any reason.

Response: Compliant

2.6.3.2 - The product withdrawal and recall system shall be reviewed, tested, and verified as effective at least annually. Testing shall include incoming materials (minimum traceability one step back) and finished product (minimum traceability one step forward). Testing shall be carried out on products from different shifts and for materials (including bulk materials) that are used across a range of products and/or products that are shipped to a wide range of customers.

Response: Compliant

2.6.3.3 - Records shall be maintained of withdrawal and recall tests, root cause investigations into actual withdrawals and recalls, and corrective and preventative actions applied.

Response: Compliant

2.6.3.4 - SQFI and the certification body shall be notified in writing within twenty-four (24) hours upon identification of a food safety event that requires public notification. SQFI shall be notified at foodsafetycrisis@sqfi.com.

Response: Compliant

Summary -

Response: A Recall or Withdrawal Policy is in place. The "Recall & Recovery Plan" Doc No. SOP-011, Version 07 was updated on March 24, 2025. In case of a recall or withdrawal the recall would be initiated by the QA Manager/SQF Practitioner. The recall would be conducted by the QA manager along with the recall team. Notification to the customers and the public would be by the VP of Operations. A contact list is in place which includes customers, the CB, regulatory and SQFI. SQFI and the Certification Body (MXNS) will be contacted in writing within 24 hrs. of a recall. A root cause investigation of the recall would be conducted. The site has not had a recall since the last SQF audit. A mock recall was conducted on September 11 of 2025 for "PARMESAN SHEDDED DOM 2/5 # BAGS ARREZZIO". 4029 cases were produced. 100% of the product was accounted for in 01:52 hours. The documentation reviewed was complete. Records for mock recalls were reviewed. A second trace was completed on February 20 of 2026 for "PARMESAN NO CELLULOSE GRATED 4/5 # BLUE BAGS CHEESE MERCHANTS". 383 cases were produced. 100% of the product was accounted for in 01:30 hours. The records were complete. Currently, the site does not produce any products for the specific customer Site complies with customer specific requirements.

2.6.4 - Crisis Management Planning

2.6.4.1 - A crisis management plan based on the understanding of known potential dangers (e.g., flood, drought, fire, tsunami, or other severe weather events, warfare or civil unrest, computer outage, pandemic, loss of electricity or refrigeration, ammonia leak, labor strike) that can impact the site's ability to deliver safe food shall be documented by senior management, outlining the methods and responsibility the site shall implement to cope with such a business crisis. The crisis management plan shall include at a minimum: i. A senior manager responsible for decision making, oversight, and initiating actions arising from a crisis management incident; ii. The nomination and training of a crisis management team; iii. The controls implemented to ensure any responses do not compromise product safety; iv. The measures to isolate and identify product affected by a response to a crisis; v. The measures taken to verify the acceptability of food prior to release; vi. The preparation and maintenance of a current crisis alert contact list, including supply chain customers; vii. Sources of legal and expert advice; and viii. The responsibility for internal communications and communicating with authorities, external organizations, and media.

Response: Compliant

2.6.4.2 - The crisis management plan shall be reviewed, tested, and verified at least annually with gaps and appropriate corrective actions documented. Records of reviews of the crisis management plan shall be maintained.

Response: Compliant

Summary -

Response: The "Crisis Management Plan" was recently reviewed on February 18 of 2026, to provide up-to-date guidance during unforeseen events. The purpose was to better define the company's response to potential dangers related to severe weather, fire, power loss, catastrophic and/or regional events that may threaten food product safety and quality. The procedure includes roles, responsibilities, actions and communications for specific events. The crisis management plan ensures that team members are familiar with the withdrawal and recall procedures of the facility. The team is comprised of 17 members representing a cross section of job functions. It is led by the Vice President of Operations. The crisis management plan includes operational controls used to assure that food safety is not compromised and if the integrity of any product is compromised, how the product will be isolated, controlled and who has the authority to determine the outcome. The crisis contact list includes legal and expert advice, the CB and SQFI. The crisis management team

recently met on February 18 of 2026 to review, evaluate and challenge the plan. The site simulated a natural disaster, documenting all of the various meetings and actions taken.

2.7.1 - Food Defense Plan (Mandatory)

2.7.1.1 - A food defense threat assessment shall be conducted to identify potential threats that can be caused by a deliberate act of sabotage or terrorist-like incident.

Response: Compliant

2.7.1.2 - A food defense plan shall be documented, implemented, and maintained based on the threat assessment (refer to 2.7.1.1). The food defense plan shall meet legislative requirements as applicable and shall include at a minimum: i. The methods, responsibility, and criteria for preventing food adulteration caused by a deliberate act of sabotage or terrorist-like incident; ii. The name of the senior site management person responsible for food defense; iii. The methods implemented to ensure only authorized personnel have access to production equipment and vehicles, manufacturing, and storage areas through designated access points; iv. The methods implemented to protect sensitive processing points from intentional adulteration; v. The measures taken to ensure the secure receipt and storage of raw materials, ingredients, packaging, equipment, and hazardous chemicals to protect them from deliberate acts of sabotage or terrorist-like incidents; vi. The measures implemented to ensure raw materials, ingredients, packaging (including labels), work-in-progress, process inputs, and finished products are held under secure storage and transportation conditions; and vii. The methods implemented to record and control access to the premises by site personnel, contractors, and visitors.

Response: Compliant

2.7.1.3 - Instruction shall be provided to all relevant staff on the effective implementation of the food defense plan (refer to 2.9.2.1).

Response: Compliant

2.7.1.4 - The food defense threat assessment and prevention plan shall be reviewed and tested at least annually or when the threat level, as defined in the threat assessment, changes. Records of reviews and tests of the food defense plan shall be maintained.

Response: Compliant

Summary -

Response: The company has written food defense program. "Food Defense Plan", SOP-017, Version: 09 dated May 16, 2025; provides security measures to protect the company's food products. The VP of Operations and the QA Manager/SQF Practitioner oversees the program. The processing and warehousing operations are secured with locked steel doors. All doors are self-closing and locking. Training for food defense is annually. Methods are in place on how employee access to the facility is controlled. Trailers are required to be sealed both inbound and outbound. Visitors and contractors must sign at the main office. The Employees must enter the buildings thru a front door where management staffs reside. Chemicals are stored securely in a locked cage. The food defense team is comprised of eleven (11) members. The team last met in January 13 of 2026 to re-assess the food defense plan. No improvements were needed. The facility's food defense plan was challenged on March 10 of 2025 with a known person walking around in the facility violation all GMP's rules. The activity was immediately reported to senior management proving the employees are trained adequately. The data was recorded on the "Defense Event Report." The company (both facilities) are registered with FDA Registration No. ***** 1714 - CMA (last four digits) and FDA Registration No. ***** 4844 - WC (las four digits) which expire on December 31 of 2026, and the "Illinois Department of Health" - Dairy Food Registration

17-522".

2.7.2 - Food Fraud (Mandatory)

2.7.2.1 - The methods, responsibility, and criteria for identifying the site's vulnerability to food fraud, including susceptibility to raw material or ingredient substitution, finished product mislabeling, dilution, or counterfeiting, shall be documented, implemented, and maintained.

Response: Compliant

2.7.2.2 - A food fraud mitigation plan shall be developed and implemented that specifies the methods by which the identified food fraud vulnerabilities shall be controlled, including identified food safety vulnerabilities of ingredients and materials.

Response: Compliant

2.7.2.3 - Instruction shall be provided to all relevant staff on the effective implementation of the food fraud mitigation plan (refer to 2.9.2.1).

Response: Compliant

2.7.2.4 - The food fraud vulnerability assessment and mitigation plan shall be reviewed and verified at least annually with gaps and corrective actions documented. Records of reviews shall be maintained.

Response: Compliant

Summary -

Response: "Food Defense & Adulteration Prevention SOP-017", Version:09 dated on May 16, 2025; provides instructions for reducing the company's vulnerability to food fraud. Approved suppliers must qualify for supplying the company with ingredients and packaging materials by achieving GFSI certification. This criterion ensures suppliers themselves have a secure food fraud program in place. All incoming raw materials (ingredients and packaging supplies) are inspected at receipt. Certificates of Analysis must accompany each shipment. The VP of Operations and QA Manager/SQF Practitioner are responsible for overseeing the company's food fraud program. A Food Fraud Assessment is conducted annually as part of the food safety plan reassessment. The last reassessment was performed on January 13 of 2026, by the food safety team. COAs were verified for the company's primary ingredient which is cheese from "MULLINS Cheese Factory" from Wisconsin and found acceptable.

2.8.1 - Allergen Management (Mandatory)

2.8.1.1 - The responsibility and methods used to control allergens and to prevent sources of allergens from contaminating product shall be documented and implemented. The allergen management program shall include: i. A risk analysis of those raw materials, ingredients, and processing aids, including food grade lubricants, that contain food allergens; ii. An assessment of workplace-related food allergens that may originate from locker rooms, vending machines, lunchrooms, and visitors; iii. A list of allergens that is applicable in the country of manufacture and the country(ies) of destination, if known; iv. A list of allergens that is accessible to relevant staff; v. The control of hazards associated with allergens and incorporated into the food safety plan; and vi. Management plans for control of the identified allergens.

Response: Compliant

2.8.1.2 - Instructions shall be provided to all relevant staff involved in the receipt or handling of raw materials,

work-in-progress, rework, or finished product on how to identify, handle, store, and segregate raw materials and products containing allergens.

Response: Compliant

2.8.1.3 - Provisions shall be made to clearly identify and segregate foods that contain allergens. Segregation procedures shall be implemented and continually monitored.

Response: Compliant

2.8.1.4 - Where allergenic material may be intentionally or unintentionally present cleaning and sanitation of product contact surfaces between line changeovers shall be effective, appropriate to the risk and legal requirements, and sufficient to remove all potential target allergens from product contact surfaces, including aerosols as appropriate, to prevent cross-contact. Separate handling and production equipment shall be provided, where satisfactory line hygiene and clean-up or segregation are not possible.

Response: Compliant

2.8.1.5 - Based on risk assessment, procedures for validation and verification of the effectiveness of the cleaning and sanitation of areas and equipment in which allergens are used shall be documented and effectively implemented.

Response: Compliant

2.8.1.6 - Where allergenic material may be present, product changeover procedures shall be documented and implemented to eliminate the risk of cross-contact.

Response: Compliant

2.8.1.7 - The product identification system (refer to 2.6.1.1) shall make provision for clear identification and labeling, in accordance with the regulatory requirements of those products produced on production lines and equipment on which foods containing allergens are manufactured.

Response: Compliant

2.8.1.8 - The product trace system (refer to 2.6.2) shall take into consideration the conditions under which allergen-containing foods are manufactured and ensure full traceback of all ingredients and processing aids used.

Response: Compliant

2.8.1.9 - The site shall document and implement methods to control the accuracy of finished product labels (or consumer information where applicable) and assure work-in progress and finished product are true to label with regard to allergens. Measures may include label approvals at receipt, label reconciliations during production, destruction of obsolete labels, verification of labels on finished product as appropriate, and product change over procedures.

Response: Compliant

2.8.1.10 - Re-working of product (refer to 2.4.6) containing food allergens shall be conducted under conditions that ensure product safety and integrity are maintained. Re-worked product containing allergens shall be clearly identified and traceable.

Response: Compliant

2.8.1.11 - Sites that do not handle allergenic materials or produce allergenic products shall document, implement and maintain an allergen management program addressing at a minimum the mitigation of introduced or unintended allergens through supplier, contract manufacturer, site personnel, and visitor activities.

Response: Compliant

Summary -

Response: The site's Allergen Management Policy to control allergens and prevent contamination of other products is found in document SOP-020, Version: 6 dated February 6, 2026 "Allergen Management for Food Manufacturing", and is the responsibility of the Quality Assurance Manager/SQF Practitioner. The allergen of concern in this operation was observed to be only "MILK". A risk analysis was observed to be in place for allergens, including raw materials, ingredients and processing aids such as food grade lubricants. An assessment of workplace-related food allergens for locker rooms, vending machines, lunchrooms, and visitors was performed in April 1, 2025. The operation was found to have a product identification system that includes clear identification and labeling of products to meet regulatory requirements when made on production lines used for allergenic products. Proper procedures for cleaning of food contact surfaces, including periodic validation of cleaning methods by protein-specific testing, were found to be in place. The facility has a designated non-allergen production room, which is separate from the dairy operation. The allergen room has designated smocks that are worn while in the production room and blue hairnets and purple nitrile gloves. The product identification system includes the allergen. All non-allergen products are also tested for milk allergens before being released by a certified third-party laboratory. A test results was verified for: Item No. 10893, Lot No. UBDNOV1326 – Allergen Milk <2.5 ppm using ELISA (Neogen Veratox). The site has procedures in place to control the accuracy of finished product labels, including labels of allergenic products. This was observed to be implemented on the plant floor. Product changeovers where allergen cross-contamination could occur are not utilized.

2.9.1 - Training Requirements

2.9.1.1 - The responsibility for establishing and implementing the training needs of the organization's personnel to ensure they have the required competencies to carry out those functions affecting products, legality, and safety shall be defined and documented (refer to 2.1.1.6).

Response: Compliant

2.9.1.2 - Appropriate training shall be provided for personnel carrying out the tasks essential to the effective implementation of the SQF System and the maintenance of food safety and regulatory requirements.

Response: Compliant

Summary -

Response: Appropriate training is provided for all plant personnel for all tasks to ensure the effective implementation of the SQF system. Training programs are the assigned responsibility of the Quality Assurance Manager/SQF Practitioner. The effectiveness of the facility's training program was evidenced by interviews with plant employees.

2.9.2 - Training Program (Mandatory)

2.9.2.1 - A training program shall be documented and implemented that at a minimum outlines the necessary competencies for specific duties and the training methods to be applied to personnel carrying out tasks associated with: i. Implementing HACCP for staff involved in developing and maintaining food safety plans; ii. Monitoring and corrective action procedures for all staff engaged in monitoring critical control points (CCPs); iii. Personal hygiene for all staff involved in the handling of food products and food contact surfaces; iv. Good Manufacturing Practices and work instructions for all staff engaged in food handling, food processing, and equipment; v. Sampling and test

methods for all staff involved in sampling and testing of raw materials, packaging, work-in-progress, and finished products; vi. Environmental monitoring for relevant staff; vii. Allergen management, food defense, and food fraud for all relevant staff; and viii. Tasks identified as critical to meeting the effective implementation and maintenance of the SQF code. The training program shall include provisions for identifying and implementing the refresher training needs of the organization.

Response: Compliant

2.9.2.2 - Training materials, the delivery of training, and procedures on all tasks critical to meeting regulatory compliance and the maintenance of food safety shall be provided in language(s) understood by staff.

Response: Compliant

2.9.2.3 - Training records shall be maintained and include: i. Participant name; ii. Skills description; iii. Description of the training provided; iv. Date training completed; v. Trainer or training provider; and vi. Verification that the trainee is competent to complete the required tasks.

Response: Compliant

Summary -

Response: The site has implemented a "Training Program" SOP-029, Version: 05, dated on January 23, 2026; which covers the necessary competencies for plant personnel. This program requires training to be conducted in HACCP, Allergen, GMP, Food Security, Food Defense and Foreign Material contamination to ensure regulatory, food safety, food quality and all other requirements of the SQF System are met. This training program is administered by the Quality Assurance Manager. The training language and materials are in English and Spanish, the languages used in the operation and understood by all plant personnel. Work instructions have been written explaining how tasks critical to maintaining food safety are performed. Records of work instruction training were reviewed for Non-Conforming Materials and Product Hold Procedure. HACCP training for personnel involved in the development and maintaining the food safety plan is administered. The last training occurred on January 29 of 2026. Periodic refresher training needs have been identified in the Training Program. From a review of refresher training records covering HACCP, Allergen, GMP, Food Security, Food Defense, GMP and interviews with employees on the plant floor, it was evident the proper refresher training has been conducted to ensure food safety, quality and the SQF system are maintained. Specific refresher training topics are covered annually. Training Records are maintained by the Quality Assurance Manager and during the review was found to have a listing of the trainee, trainer, the description of the training, the date of training and verification by supervision that the training was completed. The site verifies the effectiveness of training by quizzes and employee observations. Plant employees interviewed on the production floor were found to have current training records on the register.

11.1.1 - Premises Location and Approval

11.1.1.1 - The site shall assess local activities and the site environment to identify any risks that may have an adverse impact on product safety and implement controls for any identified risks. The assessment shall be reviewed in response to any changes in the local environment or activities. The construction and ongoing operation of the premises on the site shall be approved by the relevant authority.

Response: Compliant

Summary -

Response: The site's buildings, property surroundings and local activities were observed during the audit to

not pose a food safety risk to products. Measures have been established to maintain a suitable external environment, and the facility performs external inspections as part of its internal audit program. The last external inspection was performed by the "Illinois Department of Health" in November 13, 2025 and reviewed by management. There were no non-conformances related to the site's environment noted on a recent regulatory inspection report. Both site, CMA and WC maintains the required approvals by relevant authorities, as evidenced by FDA Registration No. ***** 1714 - CMA (last four digits) and FDA Registration No. ***** 4844 - WC (last four digits) which expire on December 31, 2026 and Illinois Dept. of Health "Dairy Food Registration No. 17-522" for its ongoing operations.

11.1.2 - Building Materials

11.1.2.1 - Floors shall be constructed of smooth, dense, impact-resistant material that can be effectively graded, drained, impervious to liquid, and easily cleaned. Floors shall be sloped to floor drains at gradients suitable to allow the effective removal of all overflow or wastewater under normal working conditions. Where floor drainage is not available, plumbed options to handle overflow or wastewater shall be in place.

Response: Compliant

11.1.2.2 - Drains shall be constructed and located so they can be easily cleaned and not present a hazard.

Response: Compliant

11.1.2.3 - Waste trap system shall be located away from any food handling areas or entrances to the premises.

Response: Compliant

11.1.2.4 - Walls, partitions, ceilings, and doors shall be of durable construction. Internal surfaces shall have an even and regular surface and be impervious with a light-colored finish and shall be kept clean (refer to 11.2.5). Wall-to-wall and wall-to-floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of food debris.

Response: Compliant

11.1.2.5 - Ducting, conduit, and pipes that convey ingredients, products, or services, such as steam or water, shall be designed and constructed to prevent the contamination of food, ingredients, and food contact surfaces and allow ease of cleaning. A risk analysis shall be conducted to ensure food contamination risks are mitigated.

Response: Compliant

11.1.2.6 - Pipes carrying sanitary waste or wastewater that are located directly over product lines or storage areas shall be designed and constructed to prevent the contamination of food, materials, ingredients, and food contact surfaces and shall allow ease of cleaning. A risk analysis shall be conducted to ensure food contamination risks are mitigated.

Response: Compliant

11.1.2.7 - Doors, hatches, and windows and their frames in food processing, handling, or storage areas shall be of a material and construction that meets the same functional requirements as for internal walls and partitions. Doors and hatches shall be of solid construction, and windows shall be made of shatterproof glass or similar material.

Response: Compliant

11.1.2.8 - Product shall be processed and handled in areas that are fitted with a ceiling or other acceptable structure that is constructed and maintained to prevent the contamination of products. Drop ceilings, where

present, shall be constructed to enable monitoring for pest activity, facilitate cleaning, and provide access to utilities.

Response: Compliant

11.1.2.9 - Stairs, catwalks, and platforms in food processing and handling areas shall be designed and constructed so they do not present a product-contamination risk and with no open grates directly above exposed food product surfaces. They shall be kept clean (refer to 11.2.5).

Response: Compliant

Summary -

Response: Product contact surfaces, surfaces not in contact with food and storage areas are constructed of suitable materials, including stainless steel, and food-grade plastic. They were observed during the audit to be properly maintained so that food safety is not compromised. Floors are constructed of smooth and dense impact-resistant material and properly graded for effective drainage of overflow or wastewater. Waste trap systems are located within the maintenance area, which is away from food handling areas. Wastewater during the audit was observed to be properly discharged. Drains were observed to be located and constructed for ease of cleaning and inspection. Walls, ceilings and doors are of durable construction with smooth and light colored surfaces. These areas were observed to be clean during the audit tours. Wall-to-wall and wall-to-floor junctures were observed to be sealed and free of debris. Ducting, piping and conduit conveying services were observed to be properly designed and installed to prevent contamination and for ease of cleaning and the risk analysis was conducted on March 2, 2026. Overhead cleaning was found to be part of the master cleaning schedule. Based on a risk assessment, overhead wastewater pipe installations did not pose a hazard of contamination to food, materials or food contact surfaces. Doors, windows and frames in product areas were observed to be properly constructed of materials with the same functional requirements as internal walls and partitions. The ceilings in all food processing and handling areas are constructed of insulated panels, which are easily cleaned and prevent product contamination. Stairs, catwalks and platforms were observed during facility tours to be constructed and designed so that food contamination is avoided, and with no open grates above exposed product surfaces.

11.1.3 - Lightings and Light Fittings

11.1.3.1 - Lighting in food processing and handling areas and at inspection stations shall be of appropriate intensity to enable the staff to carry out their tasks efficiently and effectively and shall comply with local light-intensity regulations or industry standards.

Response: Compliant

11.1.3.2 - Light fixtures in processing areas, inspection stations, ingredient and packaging storage areas, and all areas where the product is exposed shall be shatterproof, manufactured with a shatterproof covering or fitted with protective covers, and recessed into or fitted flush with the ceiling. Where fixtures cannot be recessed, structures must be protected from accidental breakage, manufactured from cleanable materials, and addressed in the cleaning and sanitation program.

Response: Compliant

11.1.3.3 - Light fixtures in the warehouse or other areas where product is covered or otherwise protected shall be designed to prevent breakage and product contamination.

Response: Compliant

Summary -

Response: Lighting was of the appropriate intensity for employees to carry out their tasks efficiently. All lighting is either covered or is shatter-proof.

11.1.4 - Inspection/ Quality Control Area

11.1.4.1 - If online inspection is required, a suitable area close to the processing line shall be provided for the inspection of product (refer to 2.4.4). The inspection/quality control area shall be provided with facilities that are suitable for examination and testing of the type of product being handled/processed. The inspection area shall: i. Have easy access to handwashing facilities; ii. Have appropriate waste handling and removal; and iii. Be kept clean to prevent product contamination.

Response: Compliant

Summary -

Response: All in-process product tests or CCP and CQP are conducted on-line and are documented in RedZone. There is no organoleptic product testing conducted in the production areas. Testing includes moisture analysis and seal checks on packaging. All testing areas were observed well-maintained, clearly defined, and within close proximity to handwashing stations.

11.1.5 - Dust, Insect, and Pest Proofing

11.1.5.1 - All external windows, ventilation openings, doors, and other openings shall be effectively sealed when closed, and proofed against dust, vermin, and other pests. External personnel access doors shall be effectively insect-proofed and fitted with a self-closing device and proper seals to protect against entry of dust, vermin, and other pests.

Response: Compliant

11.1.5.2 - External doors, including overhead dock doors in food handling areas used for product, pedestrian, or truck access, shall be designed and maintained to prevent pest ingress by at least one or a combination of the following methods: i. A self-closing device; ii. An effective air curtain; iii. A pest-proof screen; iv. A pest-proof annex; and v. Adequate sealing around trucks in docking areas.

Response: Compliant

11.1.5.3 - Electric insect control devices, pheromone, or other traps and baits shall be located and operated so they do not present a contamination risk to the product, packaging, containers, or processing equipment. Poison rodenticide bait shall not be used inside ingredients or product storage areas or processing areas where ingredients, packaging, and products are handled, processed, or exposed.

Response: Compliant

Summary -

Response: External windows, doors and other openings were observed during facility tours to be properly sealed to prevent any pest infestation or dust coming into the facility. External personnel doors were observed to be self-closing and sealed to prevent dust and pest ingress. All external doors and dock doors were sealed to prevent infestation. Electric insect devices and interior and exterior rodent stations are located so that the product is not at risk for contamination. Rodenticide bait is only used on the outside of the facility.

11.1.6 - Ventilation

11.1.6.1 - Adequate ventilation shall be provided in enclosed processing and food handling areas. Where appropriate, positive air-pressure systems shall be installed to prevent airborne contamination.

Response: Compliant

11.1.6.2 - All ventilation equipment and devices in product storage and handling areas shall be adequately cleaned as per 11.2.5 to prevent unsanitary conditions.

Response: Compliant

11.1.6.3 - Extractor fans and canopies shall be provided in areas where open cooking operations are carried out or a large amount of steam is generated. Capture velocities shall be sufficient to prevent condensation build-up and to evacuate all heat, fumes, and other aerosols to the exterior via an exhaust hood positioned over the cooker(s).

Response: Compliant

11.1.6.4 - Fans and exhaust vents shall be insect-proofed and located so they do not pose a contamination risk and shall be kept clean.

Response: Compliant

Summary -

Response: Sufficient ventilation is provided in all areas. The drying process for the dry cheese operation is conducted within a fully enclosed system that has two sets of filters in place. All HVAC systems are managed through an outside contractor. Exterior screening was observed on all vent and fans around the facility to address the risk of pests.

11.1.7 - Equipment and Utensils

11.1.7.1 - Specifications for equipment and utensils and procedures for purchasing equipment shall be documented and implemented.

Response: Compliant

11.1.7.2 - Equipment and utensils shall be designed, constructed, installed, operated, and maintained to meet any applicable regulatory requirements and to not pose a contamination threat to products.

Response: Compliant

11.1.7.3 - Equipment storage rooms shall be designed and constructed to allow for the hygienic and efficient storage of equipment and containers. Where possible, food contact equipment shall be segregated from non-food contact equipment.

Response: Compliant

11.1.7.4 - Product contact surfaces and those surfaces not in direct contact with food in food handling areas, raw material storage, packaging storage, and cold storage areas shall be constructed of materials that will not contribute to a food safety risk.

Response: Compliant

11.1.7.5 - Benches, tables, conveyors, mixers, mincers, graders, and other mechanical processing equipment shall be hygienically designed and located for appropriate cleaning. Equipment surfaces shall be smooth, impervious, and free from cracks or crevices.

Response: Compliant

11.1.7.6 - Product containers, tubs, and bins used for edible and inedible material shall be constructed of materials that are non-toxic, smooth, impervious, and readily cleaned as per 11.2.5.1. Bins used for inedible material shall be clearly identified.

Response: Compliant

11.1.7.7 - All equipment and utensils shall be cleaned after use (refer to 11.2.5.1) or at a set and validated frequency to control contamination and be stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination.

Response: Compliant

11.1.7.8 - Vehicles used in food contact, handling, or processing zones or cold storage rooms shall be designed and operated so as not to present a food safety hazard.

Response: Compliant

11.1.7.9 - Non-conforming equipment shall be identified, tagged, and/or segregated for repair or disposed of in a manner that minimizes the risk of inadvertent use, improper use, or risk to the integrity of finished product. Records of the handling, corrective action, and/or disposal of non-conforming equipment shall be maintained.

Response: Compliant

Summary -

Response: Specifications for the site's equipment, utensils and purchase procedures for equipment are documented in 11.1 Site Location and Construction Process Control SOP and were seen to be appropriately implemented. Equipment and utensils, including tables, graders, packers, conveyors, tubs, bins and containers, are designed, constructed and installed to meet regulatory requirements and prevent risks of contamination of the product. These items were found to be cleaned and stored properly after use to prevent cross-contamination. Equipment surfaces were observed to be smooth, impervious and free from cracks and crevices. Containers and bins are made of non-toxic materials and are labeled or color-coded, for appropriate use with either edible or non-edible materials. The site has implemented an effective documented storage plan for the storage of raw materials, ingredients, packaging, equipment and chemicals. Forklifts and other vehicles in processing areas and storage areas were observed not to present a food hazard. The forklifts were observed to be battery operated. The site has written procedures for withholding non-conforming equipment in the document "Non-Conforming Materials and Product Hold Procedure", which were found to be properly implemented in the facility.

11.1.8 - Grounds and Roadways

11.1.8.1 - A suitable external environment shall be established, and the effectiveness of the measures shall be monitored and periodically reviewed. The premises, its surrounding areas, storage facilities, machinery, and equipment shall be kept free of waste or accumulated debris, and vegetation shall be controlled so as not to attract pests and vermin or present a food safety hazard to the sanitary operation of the site.

Response: Compliant

11.1.8.2 - Paths, roadways, and loading and unloading areas shall be maintained so as not to present a hazard to the food safety operations of the premises. They shall be adequately drained to prevent the pooling of water. Drains shall be separate from the site drainage system and regularly cleared of debris.

Response: Compliant

11.1.8.3 - Paths from amenities leading to site entrances shall be effectively sealed.

Response: Compliant

Summary -

Response: Building grounds were adequately maintained by the company. The perimeter surrounding the building (for both sites - "CMA" and "WC") was free of waste, old equipment and accumulated debris. Ornamental shrubs were cut back from the building walls. The roadways and parking lots were maintained in a safe condition and do not pose a food safety threat. The roadways and parking lots contained several storm water runoff drains and manhole covers which prevent standing water and mud.

11.2.1 - Repairs and Maintenance

11.2.1.1 - The methods and responsibility for the maintenance and repair of plant, equipment, and buildings shall be documented, planned, and implemented in a manner that minimizes the risk of product, packaging, or equipment contamination.

Response: Compliant

11.2.1.2 - Routine maintenance of plant and equipment in any food processing, handling, or storage areas shall be performed according to a maintenance control schedule and recorded. The maintenance schedule shall be prepared to include buildings, equipment, and other areas of the premises critical to the maintenance of product safety.

Response: Compliant

11.2.1.3 - Failures of plant and equipment in any food processing, handling, or storage areas shall be documented and reviewed, and their repair(s) incorporated into the maintenance control schedule.

Response: Compliant

11.2.1.4 - Site supervisors shall be notified when maintenance or repairs are to be undertaken in any processing, handling, or storage areas.

Response: Compliant

11.2.1.5 - The maintenance supervisor and the site supervisor shall be informed if any repairs or maintenance activities pose a potential threat to product safety (e.g., pieces of electrical wire, damaged light fittings, and loose overhead fittings). When possible, maintenance is to be conducted outside operating times.

Response: Compliant

11.2.1.6 - Temporary repairs, where required, shall not pose a food safety risk and shall be included in routine inspections (refer to 2.5.4.3) and the cleaning program. There shall be a plan in place to address the completion of temporary repairs to ensure they do not become permanent solutions.

Response: Compliant

11.2.1.7 - Food contact equipment and equipment located over food contact equipment shall be lubricated with food-grade lubricant, and its use shall be controlled to minimize the contamination of the product.

Response: Compliant

11.2.1.8 - Paint used in a food handling or processing area shall be suitable for use, in good condition, and not be

used on any product contact surfaces.

Response: Compliant

Summary -

Response: The "Preventative Maintenance" SOP-10, Version 04, dated February 10, 2026; was documented and implemented. The responsibility for the maintenance and repair of plant, equipment and buildings is the Maintenance Manager. The current maintenance schedule prepared covers building, equipment and other areas of the premises critical to the maintenance of product Safety and Quality. The failure of plant and equipment issues is documented and reviewed by the Maintenance Manager on January 16, 2026. Maintenance Supervisor or Production Supervisor are notified of repair to be taken or breakage in any food handling area. No temporary repairs, loose electrical wire, loose fittings, taped equipment and over-lubricated equipment was observed during the audit. Maintenance staff and contractors remove all tools and debris from any maintenance activity when completed and inform the area Sanitation Supervisor and Quality Supervisor if sanitation is required. Tools collection, sanitation and debris removal from equipment and the operator is notified for sanitation after repairs were observed on the "Post maintenance Work-Order form" on March 5, 2025. The weekly PM work orders on the "TRIVER" dated March 1, 2026, and yearly PM work orders for the "Back flow preventer device" dated January 11, 2026, were properly documented and reviewed at this audit. NON-PM work orders on the "Dryer No. 8 on September 23, 2025, were maintained and reviewed. All electronic records were maintained and reviewed in RedZone software. The SDS for the "Fluorescent Yellow Spray Paint" was verified and was appropriate for use in the plant.

11.2.2 - Maintenance Staff and Contractors

11.2.2.1 - Maintenance staff and contractors shall comply with the site's personnel and process hygiene requirements (refer to 11.3).

Response: Compliant

11.2.2.2 - All maintenance and other engineering contractors required to work on-site shall be trained in the site's food safety and hygiene procedures or shall be escorted at all times until their work is completed.

Response: Compliant

11.2.2.3 - Maintenance staff and contractors shall remove all tools and debris from any maintenance activity once it has been completed, and inform the area supervisor and maintenance supervisor, so appropriate hygiene and sanitation can be conducted and a pre-operational inspection completed prior to the restarting of site operations.

Response: Compliant

Summary -

Response: Maintenance staff and contractors need to comply with the site's GMPs and food safety requirements. Maintenance and contractors were observed following GMP's. Maintenance employees and contractors are trained on the site's GMP's and are escorted. When maintenance occurs on a product contact surface, the area is cleaned. The areas are inspected by the supervisors prior to use. Tools collection, sanitation and debris removal from equipment and operator is notified for sanitation after repairs was observed on the "Post maintenance Work-Order - RedZone".

11.2.3 - Calibration

11.2.3.1 - The methods and responsibility for calibration and re-calibration of measuring, testing, and inspection

equipment used for monitoring activities outlined in prerequisite programs, food safety plans, and other process controls, or to demonstrate compliance with customer specifications, shall be documented and implemented. Software used for such activities shall be validated as appropriate.

Response: Compliant

11.2.3.2 - Equipment shall be calibrated against national or international reference standards and methods or to an accuracy appropriate to its use. In cases where standards are not available, the site shall provide evidence to support the calibration reference method applied.

Response: Compliant

11.2.3.3 - Calibration shall be performed according to regulatory requirements and/or to the equipment manufacturers' recommended schedule.

Response: Compliant

11.2.3.4 - Procedures shall be documented and implemented to address the resolution of potentially affected products when measuring, testing, or inspection equipment is found to be out of calibration.

Response: Compliant

11.2.3.5 - Calibrated measuring, testing, and inspection equipment shall be protected from damage and unauthorized adjustment or use.

Response: Compliant

11.2.3.6 - A directory of measuring, testing, and inspection equipment that require calibration and records of the calibration tests shall be maintained.

Response: Compliant

Summary -

Response: There is a calibration and verification program being actively implemented at Cheese Merchants of America, LLC. Procedure "Calibration" SOP-023, Version: 05, dated December 1, 2025 provides instruction for maintaining the accuracy of equipment/instruments necessary for processing cheese. The "Calibration Directory & Records" ensures calibrations of equipment/instruments are completed on a scheduled basis. It was reviewed on February 23, 2026. External service providers are used to calibrate equipment on a scheduled basis. "Loma Metal Detection Systems" calibrates the company's metal detectors each year, lasted calibration (12 units) was conducted on September 2, 2026; X-Ray (5 units) "Eagle Tall Pro XS" calibrates then annually, last calibration was conducted on February 22, 2026; Thermometers (Traceable Products) purchase every other year; Scales are calibrated annually by "Acme" lasted calibration was conducted July 10, 2025; O₂ Analyzer are calibrated annually, last calibration was conducted on October 28, 2025; Moisture Analyzer - Foss are calibrated monthly, lasted calibration was conducted in June 16, 2025; Magnet from Magnattack are calibrated annually, lasted calibration was conducted on November 20, 2025; Loma Metal Detection Systems calibrates Check Weigher, lasted calibration was conducted on September 2, 2025 and Back flow preventers annual calibration conducted by "Mars Irrigation Inc." on January 11, 2026. Calibration certificates from service providers were reviewed and found acceptable.

11.2.4 - Pest Prevention

11.2.4.1 - A documented pest prevention program shall be effectively implemented. It shall: i. Describe the methods and responsibility for the development, implementation, and maintenance of the pest prevention

program; ii. Record pest sightings and trend the frequency of pest activity to target pesticide applications; iii. Outline the methods used to prevent pest problems; iv. Outline the pest elimination methods and the appropriate documentation for each inspection; v. Outline the frequency with which pest status is to be checked; vi. Include the identification, location, number, and type of applied pest control/monitoring devices on a site map; vii. List the chemicals used. The chemicals are required to be approved by the relevant authority and their Safety Data Sheets (SDS) made available; viii. Outline the methods used to make staff aware of the bait control program and the measures to take when they come into contact with a bait station; ix. Outline the requirements for staff awareness and training in the use of pest and vermin control chemicals and baits; and x. Measure the effectiveness of the program to verify the elimination of applicable pests and to identify trends.

Response: Compliant

11.2.4.2 - Pest contractors and/or internal pest controllers shall: i. Be licensed and approved by the local relevant authority; ii. Use only trained and qualified operators, who comply with regulatory requirements; iii. Use only approved chemicals; iv. Provide a pest prevention plan (refer to 2.3.2.8), which includes a site map, indicating the location of bait stations traps and other applicable pest control/monitoring devices; v. Report to a responsible authorized person on entering the premises and after the completion of inspections or treatments; vi. Provide regular inspections for pest activity with appropriate action taken if pests are present, and vii. Provide a written report of their findings and the inspections and treatments applied.

Response: Compliant

11.2.4.3 - Pest activity risks shall be analyzed and recorded. Inspections for pest activity shall be conducted on a regular basis by trained site personnel and the appropriate action taken if pests are present. Identified pest activity shall not present a risk of contamination to food products, raw materials, or packaging. Records of all pest control inspections and applications shall be maintained.

Response: Compliant

11.2.4.4 - Food products, raw materials, or packaging that are found to be contaminated by pest activity shall be effectively disposed of, and the source of pest infestation shall be investigated and resolved. Records shall be kept of the disposal, investigation, and resolution.

Response: Compliant

11.2.4.5 - Pesticides shall be clearly labeled and stored per 11.6.4 if kept on-site.

Response: N/A

Evidence: • Pesticides were not stored on site.

11.2.4.6 - No animals shall be permitted on-site in food handling and storage areas.

Response: N/A

Evidence: • Animals were not permitted in the facility.

Summary -

Response: Site MAC: "Cheese Merchants of America, LLC - 1301 Schiferl Rd, Bartlett, IL 60103 (CMA)". "Pest Prevention" provides instruction for the company's pest control activities. Professional pest control services are provided by "McCloud Pest Solutions". Monthly service visits are provided for external areas and internal areas 2 times per month. External bait stations (40) and internal traps (80) are in correct locations to protect the facility. There are 8 insect light traps that have been placed so as not to attract insects into the plant. The Pest Control Operator's license expires on December 31, 2026. "McCloud Services" are licensed by the "Illinois

Department of Health" with December 31, 2026 expiration. Their insurance plan expires October 1, 2026. No pesticides or pesticide control application devices are stored on site. Monthly review of the PCO service report are reviewed and verified by the Sanitation Supervisor. All recommendations have been implemented at the time of this audit. The map of pest control traps was recently signed by the pest control operator on January 8, 2026. The pest control operator's service reports for several months, and revealed a low level flying insect activity. The Insect light bulbs were replaced on April 23, 2025. No animals are permitted onsite. Site WC: "Cheese Merchants of America, LLC - 2965 Enterprise Cir, West Chicago IL 60185 (WC)". "Pest Prevention" provides instruction for the company's pest control activities. Professional pest control services are provided by "McCloud Pest Solutions". Monthly service visits are provided for external areas and internal areas 2 times per month. External bait stations (42) and internal traps (64) are in correct locations to protect the facility. There are 16 insect light traps that have been placed so as not to attract insects into the plant. The Pest Control Operator's license expires on December 31, 2026. "McCloud Services" are licensed by the "Illinois Department of Health" with December 31, 2026 expiration. Their insurance plan expires October 1, 2026. No pesticides or pesticide control application devices are stored on site. Monthly review of the PCO service report are reviewed and verified by the Sanitation Supervisor. All recommendations have been implemented at the time of this audit. The map of pest control traps was recently signed by the pest control operator on January 8, 2026. The pest control operator's service reports for several months, were reviewed and revealed a low pest activity in the outside areas of the facility. The Insect light bulbs were replaced on April 23, 2025. No animals are permitted onsite.

11.2.5 - Cleaning and Sanitation

11.2.5.1 - The methods and responsibility for the effective cleaning of the food handling and processing equipment and environment and storage areas shall be documented and implemented. Consideration shall be given to: i. What is to be cleaned; ii. How it is to be cleaned; iii. When it is to be cleaned; iv. Who is responsible for the cleaning; v. Validation of the cleaning procedures for food contact surfaces (including CIP); vi. Methods used to confirm the correct concentrations of detergents and sanitizers; and vii. The responsibility and methods used to verify the effectiveness of the cleaning and sanitation program.

Response: Compliant

11.2.5.2 - Detergents and sanitizers shall be suitable for use in a food manufacturing environment, labeled according to regulatory requirements, and purchased in accordance with applicable legislation. The organization shall ensure: i. The site maintains a list of chemicals approved for use; ii. An inventory of all purchased and used chemicals is maintained; iii. Detergents and sanitizers are stored as outlined in element 11.6.4; iv. Safety Data Sheets (SDS) are provided for all detergents and sanitizers purchased; and v. Only trained staff handle sanitizers and detergents.

Response: Compliant

11.2.5.3 - Detergents and sanitizers that have been mixed for use shall be correctly mixed according to the manufacturers' instructions, stored in containers that are suitable for use, and clearly identified. Mix concentrations shall be verified and records maintained.

Response: Compliant

11.2.5.4 - Cleaning-in-place (CIP) systems, where used, shall not pose a chemical contamination risk to raw materials, ingredients, or product. CIP parameters critical to assuring effective cleaning shall be defined, monitored, and recorded (e.g., chemical and concentration used, contact time, and temperature). CIP equipment, including spray balls, shall be maintained, and any modifications to CIP equipment shall be validated. Personnel

engaged in CIP activities shall be effectively trained.

Response: Compliant

11.2.5.5 - Cleaning equipment, tools, racks, and other items used in support of the cleaning and sanitizing program shall be clearly identified, stored, and maintained in a manner that prevents contamination of processing areas, product handling equipment, and storage areas as well as the tools themselves.

Response: Compliant

11.2.5.6 - Suitably equipped areas shall be designated for cleaning product containers, knives, cutting boards, and other utensils used by staff. The areas for these cleaning operations shall be controlled so they do not interfere with manufacturing operations, equipment, or product. Racks and containers for storing cleaned utensils shall be provided as required.

Response: Compliant

11.2.5.7 - Pre-operational inspections shall be conducted following cleaning and sanitation operations to ensure food processing areas, product contact surfaces, equipment, staff amenities, sanitary facilities, and other essential areas are clean before the start of production. Pre-operational inspections shall be conducted by qualified personnel.

Response: Compliant

11.2.5.8 - Staff amenities, sanitary facilities, and other essential areas shall be inspected by qualified personnel at a defined frequency to ensure the areas are clean.

Response: Compliant

11.2.5.9 - The responsibility and methods used to verify the effectiveness of the cleaning procedures shall be documented and implemented. A verification schedule shall be prepared. A record of pre-operational hygiene inspections, cleaning and sanitation activities, and verification activities shall be maintained.

Response: Compliant

Summary -

Response: The site has a Cleaning and Sanitation Program that describes the methods and responsibilities for cleaning of processing equipment, the environment, storage areas, bathrooms and break rooms. The "Spartan" chemical is identified as a cleaning chemical provider. Spartan sanitation manual was available and reviewed at the time of the audit. Sanitation Standard Operating Procedures are written and include what is cleaned, chemical usage (concentrations), cleaning methods and who is responsible. A master sanitation plan includes all areas of the facility with frequencies and responsibilities for deep cleaning. A review of the plan from April 2025 thru February 2026, showed cleaning tasks were completed as scheduled. There is a suitable area for cleaning containers, knives, cutting boards and other utensils that does not cause a food product contamination. CIP systems or COP tanks are not utilized at this facility. Sanitation tasks and pre-operational inspections by qualified personnel are documented. A verification schedule includes the methods, frequencies and responsibilities for verifying the effectiveness of cleaning methods. Pre-operational inspections from April of 2025 through February 28, 2026 were reviewed and had proper corrective actions documented as required. Cleaning materials are stored securely and properly labeled with SDS information available to all employees. Chemicals Chlorinated Degreaser and PAA (Parecetic Acid) Sanitizer were observed to be included on a list of approved chemicals, labeled consistent with regulations and had SDS on hand. Dispensed cleaning chemicals were properly stored and identified. Cleaning chemicals mixed on-site have concentration checks conducted by the Sanitation Supervisor and recorded in Titration Check Log. Sanitation personnel are properly trained in

cleaning methods and the safe use of chemicals. The last chemical handling training was conducted February 26, 2026. Cleaning equipment, tools and racks used in the sanitation processes are labeled and maintained in a sanitary condition and are stored in the sanitation area after use. Pre-Operational inspection on line No. 51 was conducted and observed on March 4, 2026 @ 16:00 hours. Absence of ATP confirms effective cleaning and sanitation activities. Past records of ATP residues indicated < 60 RLU except plastic material which has a slightly higher threshold of < 100 RLU. The Sanitation Supervisor reviews and approves the cleaning and sanitation program with daily records maintained. Site complies with customer specific requirements.

11.3.1 - Personnel Welfare

11.3.1.1 - Personnel who are known to be carriers of infectious diseases that present a health risk to others through the packing or storage processes shall not engage in the processing or packing of food or enter storage areas where food is exposed. Medical Amendment added: Code Amendment #1A medical screening procedure shall be in place for all employees, visitors and contractors who handle exposed product or food contact surfaces.

Response: Compliant

11.3.1.2 - The site shall have measures in place to prevent contact of materials, ingredients, food packaging, food, or food contact surfaces from any bodily fluids, open wounds, coughing, sneezing, spitting, or any other means. In the event of an injury that causes the spillage of bodily fluid, a properly trained staff member shall ensure that all affected areas, including handling and processing areas, have been adequately cleaned, and that all materials and products have been quarantined and/or disposed of.

Response: Compliant

11.3.1.3 - Personnel with exposed cuts, sores, or lesions shall not engage in handling or processing exposed products or handling primary (food contact) packaging or touching food contact surfaces. Minor cuts or abrasions on exposed parts of the body shall be covered with a colored, metal-detectable bandage or an alternative suitable waterproof and colored dressing.

Response: Compliant

Summary -

Response: No employees with an obvious illness were observed in the facility. The Employee GMP manual informs employees to stay home if they are ill. This is also covered during orientation. Visitors are not allowed into the facility if they are ill. Employees are trained on Blood Borne pathogens. The Safety Team is responsible for overseeing the cleaning of bodily fluid spills. QA will inspect the area after sanitation has been completed. There were no employees observed with open cuts or sores. Blue metal detectable band aids were available to employees if required.

11.3.2 - Handwashing

11.3.2.1 - All personnel shall have clean hands, and hands shall be washed by all staff, contractors, and visitors: i. On entering food handling or processing areas; ii. After each visit to a toilet; iii. After using a handkerchief; iv. After smoking, eating, or drinking; and v. After handling wash down hoses, cleaning materials, dropped product, or contaminated material.

Response: Compliant

11.3.2.2 - Handwashing stations shall be provided adjacent to all personnel access points and in accessible locations throughout food handling and processing areas as required.

Response: Compliant

11.3.2.3 - Handwashing stations shall be constructed of stainless steel or similar non-corrosive material and at a minimum supplied with: i. A potable water supply at an appropriate temperature; ii. Liquid soap contained within a fixed dispenser; iii. Paper towels in a hands-free cleanable dispenser; and iv. A means of containing used paper towels.

Response: Compliant

11.3.2.4 - The following additional facilities shall be provided in high-risk areas: i. Hands-free operated taps; and ii. Hand sanitizers.

Response: Compliant

11.3.2.5 - Signage in appropriate languages instructing people to wash their hands before entering the food processing areas shall be provided in a prominent position in break rooms, at break room exits, toilet rooms, and in outside eating areas, as applicable.

Response: Compliant

11.3.2.6 - When gloves are used, personnel shall maintain the handwashing practices outlined above.

Response: Compliant

Summary -

Response: A policy covering hand washing requirements has been documented and implemented. Hand wash basins are located at appropriate employee access points to processing areas. Hand wash sinks are made of non-corrosive materials and supplied with tempered potable water. Soap in a fixed dispenser, paper towels and waste containers are available. Hands-free operated taps and hand sanitizers are available in all areas of the facility. Signs are posted reminding employees to wash their hands before returning to work. Signs are posted at hand wash stations and in bathrooms. Employees are required to wash hands when wearing gloves. Interviews conducted during the audit demonstrated that employees understand the hand washing requirements. Employees were observed to wash their hands properly during the audit and to use proper glove procedures. Site complies with customer specific requirements.

11.3.3 - Clothing and Personal Effects

11.3.3.1 - The site shall undertake a risk analysis to ensure that the clothing and hair policy protects materials, food, and food contact surfaces from unintentional microbiological or physical contamination.

Response: Compliant

11.3.3.2 - Clothing worn by staff engaged in handling food shall be maintained, stored, laundered, and worn so it does not present a contamination risk to products.

Response: Compliant

11.3.3.3 - Clothing, including shoes, shall be clean at the start of each shift and maintained in a serviceable condition.

Response: Compliant

11.3.3.4 - Excessively soiled uniforms shall be changed or replaced when they present a product contamination risk.

Response: Compliant

11.3.3.5 - Disposable gloves and aprons shall be changed after each break, upon re-entry into the processing area, and when damaged. Non-disposable aprons and gloves shall be cleaned and sanitized as required and when not in use stored on racks provided in the processing area or in designated sealed containers in personnel lockers. They should not be placed or stored on packaging, ingredients, product, or equipment.

Response: Compliant

11.3.3.6 - Protective clothing shall be manufactured from material that will not pose a food safety threat and is easily cleaned. All protective clothing shall be cleaned after use, or at a frequency to control contamination, and stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination.

Response: Compliant

11.3.3.7 - Racks shall be provided for the temporary storage of protective clothing when staff leave the processing area and shall be provided nearby or adjacent to the personnel access doorways and handwashing facilities.

Response: Compliant

11.3.3.8 - Jewelry and other loose objects shall not be worn or taken into a food handling or processing operation or into any area where food is exposed. Wearing plain bands with no stones, prescribed medical alert bracelets, or jewelry accepted for religious or cultural reasons can be permitted, provided these items are properly covered and do not pose a food safety risk. All exceptions shall meet regulatory and customer requirements and shall be subject to a risk assessment and evidence of ongoing risk management.

Response: Compliant

Summary -

Response: "Clothing and hair vulnerability assessment" was conducted on January 13, 2026. The assessment showed that the clothing and hair policy did not pose a risk to product or product contact surfaces. Uniform observed on employees are in good repair and provided by "UniFirst Uniform Services". All employees are required to wear lab coats, hairnets, in the cheese processing and packaging areas. Clothing worn by employees was stored so as not to get contaminated. Clothing and shoes worn by employees were clean at the start of the shift. Excessively soiled uniforms can be changed if required. The company also provides single-service gloves and has a "Glove Policy" to provide instructions to employees for glove practices. Disposable gloves were changed after breaks and when they became soiled. Protective clothing was manufactured from appropriate materials. Racks were provided for the storage of lab coats. No employees were observed wearing jewelry or other loose items above the waist.

11.3.4 - Visitors

11.3.4.1 - All visitors shall be trained in the site's food safety and hygiene procedures before entering any food processing and handling areas or shall be escorted at all times in food processing, handling, and storage areas.

Response: Compliant

11.3.4.2 - All visitors, including management staff, shall be required to remove jewelry and other loose objects in accordance with the facilities Good Manufacturing Practices and 11.3.3.8. All visitors shall wear suitable clothing and footwear when entering any food processing and handling area.

Response: Compliant

11.3.4.3 - Visitors exhibiting visible signs of illness shall be prevented from entering areas in which food is handled and processed.

Response: Compliant

11.3.4.4 - Visitors shall enter and exit food handling areas through the proper staff entrance points and comply with all handwashing and personnel practice requirements.

Response: Compliant

Summary -

Response: Visitors, management, and maintenance staff were observed with suitable clothing and proper footwear when entering the food processing area at the time of the audit. Visitors and plant personnel are required to remove all jewelry and other loose objects prior to entering the production area. All visitor/auditor was trained in the site's food safety and hygiene procedures before entering any food processing or handling areas via "Notice to visitor". Observations of a service contractor on the first, second and third day of this audit verified compliance to this requirement. Everyone must enter through the proper doorways, wash hand and follow GMP requirements.

11.3.5 - Staff Amenities (change rooms, toilet, break rooms)

11.3.5.1 - Staff amenities shall have documented cleaning procedures, be supplied with appropriate lighting and ventilation, and shall be made available for use by all persons engaged in the handling and processing of product.

Response: Compliant

11.3.5.2 - Change rooms shall be provided to enable staff and visitors to change into and out of protective clothing as required. Change rooms shall be kept clean.

Response: Compliant

11.3.5.3 - High-risk change areas shall be provided for staff engaged in the processing of high-risk foods or processing operations in which clothing can be soiled.

Response: Compliant

11.3.5.4 - Provision shall be made for staff to store their street clothing and personal items separate from clean uniforms, food contact zones, food, and packaging storage areas.

Response: Compliant

11.3.5.5 - Where required, a sufficient number of showers shall be provided for use by staff.

Response: Compliant

11.3.5.6 - Toilet rooms shall be: i. Designed and constructed so that they are accessible to staff and separate from any processing and food handling operations; ii. Accessed from the processing area via an airlock vented to the exterior or through an adjoining room; iii. Sufficient in number for the maximum number of staff; iv. Constructed so that they can be easily cleaned and maintained; v. Located inside or nearby areas for storing protective clothing, outer garments, and other items while using the facilities; and vi. Kept clean and tidy. Tools/equipment used for cleaning toilet rooms shall not be used to clean processing areas.

Response: Compliant

11.3.5.7 - Sanitary drainage shall not be connected to any other drains within the premises and shall be directed to

a septic tank or a sewerage system in accordance with regulations.

Response: Compliant

11.3.5.8 - Handwashing basins shall be provided immediately outside or inside the toilet room and designed as outlined in 11.3.2.3.

Response: Compliant

11.3.5.9 - Separate break rooms shall be provided away from food contact/handling zones. Break rooms shall be: i. Ventilated and well lit; ii. Provided with adequate tables and seating to cater for the maximum number of staff at one sitting; iii. Equipped with a sink serviced with hot and cold potable water for washing utensils; iv. Equipped with refrigeration and heating facilities, enabling staff to store or heat food and to prepare non-alcoholic beverages if required; and v. Kept clean and free from waste materials and pests.

Response: Compliant

11.3.5.10 - Where outside eating areas are provided, they should be kept clean and free from waste materials and maintained in a manner that minimizes the potential for the introduction of contamination, including pests to the site.

Response: Compliant

Summary -

Response: Employee bathrooms and break rooms were observed to be appropriately lit and ventilated and available for all personnel at the facility. There are facilities for employees to change into and out of protective clothing. Provisions have been made for storage of street clothing and personal items and are separate from processing and storage areas. Change rooms are provided for employees working in all areas. Showers are not provided for employee use. Restrooms and washrooms were observed to be separate from food processing and handling areas and accessed via a separate room or airlock. Tools used in cleaning of the restrooms are dedicated and not used in other areas of the site. An area has been provided for the storage of outer coats and other items while using the facilities. Sanitary facilities were observed to be sufficient in number for all employees and were cleaned and maintained on a scheduled basis. An interview with Quality Assurance Manager and the Maintenance Manager, combined with onsite observations provided satisfactory evidence that sanitary drainage is separated from plant drainage and that it is disposed of in accordance with regulations. The sanitary facilities have hand wash sinks that comply with the requirements of the SQF Code. Breakrooms that are properly separated from production are available, well lit, properly ventilated and are appropriately sized for the number of facility employees. Lunchrooms include hot and cold potable water, food storage areas, refrigerators with hand and utensil washing capabilities. Outside eating areas are not provided. Signs reminding employees to wash their hands before returning to work were observed at the exit to lunchrooms and in or adjacent to outside eating areas where applicable, in languages understood by staff. Lunchrooms were observed to be clean and well-maintained during the audit tours. Documented cleaning procedures are available for the staff amenities. Staff amenities are cleaned as part of the master sanitation schedule.

11.4.1 - Staff Engaged in Food Handling and Processing Operations

11.4.1.1 - All personnel engaged in any food handling, preparation, or processing operations shall ensure that products and materials are handled and stored in such a way as to prevent damage or product contamination. They shall comply with the following processing practices: i. Personnel entry to processing areas shall be through the personnel access doors only; ii. All doors are to be kept closed. Doors shall not be open for extended periods

when access is required for waste removal or receiving of product/ingredient/packaging; iii. Packaging, product, and ingredients shall be kept in appropriate containers as required and off the floor; v. Waste shall be contained in the bins identified for this purpose and removed from the processing area on a regular basis and not left to accumulate; and v. All wash down and compressed air hoses shall be stored on hose racks after use and not left on the floor.

Response: Minor

Evidence: • Several air hoses were observed lying directly on the floor, improperly stored on holders in the processing/packaging rooms. This was observed during the first three (3) days of the audit.

Root Cause: Company oversight. SOP 001 Good Manufacturing Practices does address that gloves need to be changed when they become contaminated, but we understand how improving how hoses are used and stored will be helpful in reduction of situations where potential contamination can occur.

Corrective Action: 1. Meeting with Sanitation, QA, and Operations management to review the location of all air hoses in the facility took place on 3/17/26. We identified where improvements needed to be made including shortening hoses, installing hooks, and adding drops from the ceiling. All follow up actions were entered in Redzone after the meeting and assigned to maintenance to complete. Most actions are complete, but we are still waiting for the drops to be installed. Target date of completion is 4/10/26. 2. One point lesson was created to address proper hose storage and usage. Operations personnel signed off on the training as acknowledgement of adherence to these practices.

Verification Of Closeout: The auditor reviewed the root cause of the insufficient training and agreed with the corrective actions implemented: refresher GMP training on the proper use and storage of air hoses, as well as improvements in identification (including shortening the hoses, installing hooks, and adding drops from the ceiling), as shown in the pictures submitted as evidence. This was considered acceptable.

Completion Date: March 26, 2026

Closeout Date: April 6, 2026

11.4.1.2 - Personnel working in or visiting food handling or processing operations shall ensure that: i. Staff shall not eat or taste any product being processed in the food handling/contact zones, except as noted in element 11.4.1.4; ii. The wearing of false fingernails, false eyelashes, eyelash extensions, long nails, or fingernail polish is not permitted when handling exposed food; iii. Hair restraints and beard covers, where applicable, shall be used in areas where product is exposed. iv. Smoking, chewing, eating, or spitting is not permitted in areas where product is produced, stored, or otherwise exposed. v. Drinking water is permissible only under conditions that prevent contamination or other food safety risks from occurring. Drinking water containers in production and storage areas shall be stored in clear, covered containers, and in designated areas away from raw materials, packaging, tools, or equipment storage.

Response: Compliant

11.4.1.3 - The flow of personnel in food processing and handling areas shall be managed such that the potential for contamination is minimized.

Response: Compliant

11.4.1.4 - In circumstances where it is necessary to undertake sensory evaluations in a food handling/contact zone, the site shall implement controls and procedures to ensure: i. Food safety is not compromised; ii. Sensory evaluations are conducted by authorized personnel only; iii. A high standard of personal hygiene is practiced by personnel conducting sensory evaluations; iv. Sensory evaluations are conducted in areas equipped for the purpose; and v. Equipment used for sensory evaluations is sanitized, maintained, and stored separately from processing equipment.

Response: Compliant

Summary -

Response: Food handling procedures for all employees are documented and implemented. Personnel are required to access the processing areas through personnel doors only and doors were observed closed. False fingernails or fingernail polish, long nails, false or extended eyelashes are prohibited and no violations were noted. Hair restraints were observed to be worn where the product is exposed. Ingredients were in appropriate, labeled containers and kept off the floor. Product testing evaluations were conducted in designated areas that were well lit and appropriately equipped for that purpose and personnel conducting sensory evaluations are trained and maintain high hygienic standards. Wash down hoses were observed to be properly stored on racks when not in use. Site complies with customer specific requirements.

11.5.1 - Water Supply

11.5.1.1 - Adequate supplies of potable water drawn from a known clean source shall be provided for water used as an ingredient during processing operations and for cleaning the premises and equipment. The source of potable water shall be identified as well as on-site storage (if applicable) and reticulation within the facility.

Response: Compliant

11.5.1.2 - Contingency plans shall be in place for instances when the potable water supply is deemed to be contaminated or otherwise inappropriate for use.

Response: Compliant

11.5.1.3 - Supplies of hot and cold water shall be provided, as required, to enable the effective cleaning of the premises and equipment.

Response: Compliant

11.5.1.4 - The delivery of water within the premises shall ensure potable water is not contaminated. Testing of the backflow system, where possible, shall be conducted at least annually and records shall be maintained.

Response: Compliant

11.5.1.5 - The use of non-potable water shall be controlled such that: i. There is no cross-contamination between potable and non-potable water lines; ii. Non-potable water piping and outlets are clearly identified; and iii. Hoses, taps, and other similar sources of possible contamination are designed to prevent backflow or back-siphonage.

Response: N/A

Evidence: • Non-potable water was not used.

11.5.1.6 - Where water is stored on-site, storage facilities shall be adequately designed, constructed, and routinely cleaned to prevent contamination.

Response: N/A

Evidence: • Water was not stored on site.

Summary -

Response: Potable water is supplied by the Village of Bartlett Water Supply Authority. The Water Quality Report for 2024 indicated the water to be potable since it was absent for Total Coliforms and E. coli. The Water Quality Report for 2025 is not yet available from the water authority. Utilities observed during the audit were designed, maintained and monitored to control the risk of product contamination. Water is used for cleaning

and personal use. Water is not stored on site. Backflow preventers are certified annually by "Mars Irrigation Inc." The most recent service was performed on January 11, 2026. "Potable Water Contingency Plan" was reviewed on February 18, 2026, and found to be current for providing safe water if the municipality's water supply is placed on a boil water advisory.

11.5.2 - Water Treatment

11.5.2.1 - Water treatment methods, equipment, and materials, if required, shall be designed, installed, and operated to ensure water receives effective treatment. Water treatment equipment shall be monitored regularly to ensure it remains serviceable.

Response: N/A

Evidence: • The site only has the boiler treatment equipment.

11.5.2.2 - Water used as an ingredient in processing or for cleaning and sanitizing equipment shall be tested and, if required, treated to maintain potability (refer to 11.5.2.1).

Response: N/A

Evidence: • The site only has the boiler treatment equipment.

11.5.2.3 - Treated water shall be regularly monitored to ensure it meets the specified indicators. Water treatment chemicals usage shall be monitored to ensure chemical residues are within acceptable limits. Records of testing results shall be kept.

Response: N/A

Evidence: • The site only has the boiler treatment equipment.

Summary -

Response: The site only has the boiler treatment equipment.

11.5.3 - Water Quality

11.5.3.1 - Water shall comply with local, national, or internationally recognized potable water microbiological and quality standards, as required when used for: i. Washing, thawing, and treating food; ii. Handwashing; iii. Conveying food; iv. An ingredient or food processing aid; v. Cleaning food contact surfaces and equipment; vi. The manufacture of ice; or vii. The manufacture of steam that will come into contact with food or be used to heat water that will come into contact with food.

Response: Compliant

11.5.3.2 - Microbiological analysis of the water and ice supply shall be conducted to verify the cleanliness of the supply, the monitoring activities, and the effectiveness of the treatment measures implemented. Samples for analysis shall be taken at sources supplying water for the process or cleaning or from within the site. The frequency of analysis shall be risk-based and at a minimum annually.

Response: Compliant

11.5.3.3 - Water and ice shall be analyzed using reference standards and methods.

Response: Compliant

Summary -

Response: Potable water is supplied by the Village of Bartlett Water Supply Authority. The Water Quality Report for 2024 indicated the water to be potable since it was absent for Total Coliforms and E. coli. The water authority's public water supply identification number is 63793. The water supply authority is in good standing with the Illinois Department of Natural Resources and is responsible for monitoring the water it supplies to the facility according to EPA's Safe Drinking Water Act. Analytical results from a spigot sample submitted to "Certified Laboratories of the Midwest" on February 3, 2026, indicated the bacteriological parameters were in compliance with the Safe Drinking Water Act. Analytical results revealed Total coliform count < 1.1 MPN/100 mL, and Heterotrophic Plate Count < 1 CFU/mL.

11.5.4 - Ice Supply

11.5.4.1 - Ice provided for use during processing operations, as a processing aid, or an ingredient shall comply with 11.5.3.1.

Response: N/A

Evidence: • The site does not use ice in the process.

11.5.4.2 - Ice that is purchased shall be from an approved supplier and included in the site's food safety risk assessment. Ice shall be supplied in containers that are appropriate for use, cleanable if reused, and tested as appropriate.

Response: N/A

Evidence: • The site does not use ice in the process.

11.5.4.3 - Ice rooms and receptacles shall be constructed of materials as outlined in element 11.1.2 and designed to minimize contamination of the ice during storage, retrieval, and distribution.

Response: N/A

Evidence: • The site does not use ice in the process.

Summary -

Response: The site does not use ice in the process.

11.5.5 - Air and Other Gasses

11.5.5.1 - Compressed air or other gases (e.g., nitrogen or carbon dioxide) that contact food or food contact surfaces shall be clean and present no risk to food safety.

Response: Compliant

11.5.5.2 - Compressed air systems and systems used to store or dispense other gases that come into contact with food or food contact surfaces shall be maintained and regularly monitored for quality and applicable food safety hazards. The frequency of analysis shall be risk-based and at a minimum annually.

Response: Compliant

Summary -

Response: "Compressed Air and Production Room Air Testing" SOP-042, Version: 010, dated January 19, 2026 outlines all testing requirements. Compressed air is monitored with a CAMTU for APC and Yeast & Mold for the compressed air system that is used in the sanitation process. Compressed air used in the manufacturing process does not present risk to food safety as evidenced by compressed air quality annual test for Y&M on

February 17, 2026. The facility uses modified atmosphere air for packaging for the fresh products. O₂ levels are monitored as a CQP in production. The facility uses modified atmosphere air for packaging for the fresh products. Certified Laboratories the mid-West provide agar plates to collect samples. Compressed air is run through the device for 20 seconds. Testing is conducted at point of use twice a year from four (4) sites in total, two (2) in fresh and two (2) in dry. Results are required to be less than 20 CFU/ 20 SEC or less than 10 CFU/20 Sec. for Yeast & Mold. Nitrogen testing was reviewed from February 26, 2026 and certified that the Nitrogen's conformance to the CGA G-10.1 QVL M commodity specification - Assay > 99.999%.

11.6.1 - Receipt, Storage and Handling of Goods

11.6.1.1 - The site shall document and implement an effective storage plan that allows for the safe, hygienic receipt and storage of raw materials (i.e., frozen, chilled, and ambient), ingredients, packaging, equipment, and chemicals.

Response: Compliant

11.6.1.2 - Controls shall be in place to ensure all ingredients, raw materials, processing aids, and packaging are received and stored properly to prevent cross-contamination risks. Unprocessed raw materials shall be received and stored separately from processed raw materials to avoid cross-contamination risk.

Response: Compliant

11.6.1.3 - The responsibility and methods for ensuring effective stock rotation principles shall be documented and implemented.

Response: Compliant

11.6.1.4 - Procedures shall be in place to ensure that all ingredients, materials, work- in-progress, rework, and finished product are utilized within their designated shelf-life.

Response: Compliant

11.6.1.5 - Where raw materials, ingredients, packaging, equipment, and chemicals are held under temporary or overflow conditions that are not designed for the safe storage of goods, a risk analysis shall be undertaken to ensure there are no risks to the integrity of those goods, no potential for contamination or adverse effect on food safety.

Response: Compliant

11.6.1.6 - Records shall be available to verify the effectiveness of alternate or temporary control measures for the storage of raw materials, ingredients, packaging, equipment, chemicals, or finished products.

Response: Compliant

Summary -

Response: The product cooler was adequate and effective to chill and store refrigerated products when observed. Product cooler was properly designed and constructed for inspection and easy cleaning. The product, ingredients or packaging materials were properly rotated in a FIFO manner. The "Receiving of Materials" SOP-004, Version: 05, dated February 10, 2026 requires that all deliveries be inspected for sanitary and food safety conditions. All incoming material inspections are documented on the incoming materials inspection report. The facility has a separate "Transfer of Finished Goods, Raw Materials and Packaging" SOP-51, Version: 04, dated January 27, 2026 pertaining to intercompany transfers from the main production warehouse to the offsite storage warehouse. All company transfers between the production operation and the storage warehouse are inspected according to the policy for sanitation and condition of trailers. All trailers are

required to be set at 40°F and all products must be maintained at or under 45°F. All transport of cheese products must be at or below 45°F. Inventory control is managed through "THEHIVE" to ensure product is used within the required timelines. "THEHIVE" is also able to track rework inventory. QA is responsible for verifying that all incoming ingredient labels match the specifications on file. The Inventory Control department manager is responsible for effective rotation in their area. Proper equipment storage was observed. No other alternate storage was utilized. No expired ingredients or products were observed.

11.6.2 - Cold Storage, Freezing and Chilling of Foods

11.6.2.1 - The site shall provide confirmation of the effective operational performance of freezing, chilling, and cold storage facilities. Chillers, blast freezers, and cold storage rooms shall be designed and constructed to allow for the hygienic and efficient refrigeration of food and be easily accessible for inspection and cleaning.

Response: Compliant

11.6.2.2 - Sufficient refrigeration capacity shall be available to chill, freeze, store chilled, or store frozen the maximum anticipated throughput of product with allowance for periodic cleaning of refrigerated areas.

Response: Compliant

11.6.2.3 - The site shall have a written procedure for monitoring temperatures, including the frequency of checks, and corrective actions, if the temperature is out of specification. Freezing, chilling, and cold storage rooms shall be fitted with temperature monitoring equipment that is located to monitor the warmest part of the room and be fitted with a temperature measurement device that is easily readable and accessible. Records shall be kept of frozen, cold, and chilled storage room temperatures.

Response: Compliant

11.6.2.4 - Discharge from defrost and condensate lines shall be controlled and discharged into the drainage system.

Response: Compliant

Summary -

Response: The site's coolers storage areas were constructed of white metalized refrigeration panels. The air handling systems were installed in appropriate areas to allow for sufficient ventilation. The temperatures are continuously monitored via an electronic surveillance system. Alerts are sent when the temperatures are not in specification. Records for temperature checks were maintained and in compliance. The main plant coolers include the raw material and finished product coolers set at 38°F. The production room temperature is set at 45°F. The West Chicago (WC) storage warehouse cheese aging cooler is set at 50°F. The storage cooler and refrigerated receiving and shipping docks are set at 38°F. Dry production does not have a target product room temperature. Discharge from condensate lines was into the drainage system. Cheese products are in the cooler for a period of time (6 to 10 days) and released when the bacteriological results indicate the product is safe for distribution. The QA Manager has the authority to release cheese products.

11.6.3 - Storage of Dry Ingredients, Packaging, and Shelf Stable Packaged Goods

11.6.3.1 - Rooms used for the storage of product ingredients, packaging, and other dry goods shall be located away from wet areas and constructed to protect the product from contamination and deterioration and prevent packaging from becoming a harborage for pests or vermin.

Response: Compliant

11.6.3.2 - Racks provided for the storage of packaging shall be constructed of impervious materials and designed to enable cleaning and inspection of the floors and behind the racks. Storage areas shall be cleaned at a pre-determined frequency.

Response: Compliant

Summary -

Response: The site's storage areas were appropriate for their needs. The products were stored off of the floor on pallets; most within painted metal racks in good condition.

11.6.4 - Storage of Hazardous Chemicals and Toxic Substances

11.6.4.1 - Hazardous chemicals and toxic substances with the potential for food contamination shall be: i. Clearly labeled, identifying and matching the contents of their containers; ii. Included in a current register of all hazardous chemicals and toxic substances that are stored on-site; and iii. Supplemented with current Safety Data Sheets (SDS) made available to all staff.

Response: Compliant

11.6.4.2 - Storage of hazardous chemicals and toxic substances shall be: i. Located in an area with appropriate signage indicating that the area is for hazardous storage; ii. Controlled, lockable, and accessible only by personnel trained in the storage and use of chemicals; iii. Adequately ventilated; iv. Stored where intended and not comingled (e.g., food versus non-food grade); v. Designed such that pesticides, rodenticides, fumigants, and insecticides are stored separately from sanitizers and detergents; and vi. Stored in a manner that prevents a hazard to finished product or product contact surfaces. Processing utensils and packaging shall not be stored in areas used to store hazardous chemicals and toxic substances.

Response: Compliant

11.6.4.3 - Hazardous chemicals and toxic substances shall be correctly labeled and: i. Used only according to manufacturers' instructions; ii. Controlled to prevent contamination or a hazard to raw and packaging material, work-in-progress, finished product, or product contact surfaces; iii. Returned to the appropriate storage areas after use; and iv. Be compliant with national and local legislation.

Response: Compliant

11.6.4.4 - Daily supplies of chemicals used for continuous sanitizing of water, as a processing aid, or for emergency cleaning of food processing equipment and surfaces in food contact zones may be stored within or in close proximity to a processing area, provided that access to the chemical storage facility is restricted to only authorized personnel.

Response: Compliant

11.6.4.5 - Personnel who handle hazardous chemicals and toxic substances, including pesticides and cleaning chemicals, shall: i. Shall be fully trained in the purpose of the hazardous chemicals and toxic substances, their storage, handling, and use; ii. Be provided first aid equipment and personnel protective equipment (PPE); and iii. Ensure compliance with the proper identification, storage, usage, disposal, and clean-up requirements.

Response: Compliant

11.6.4.6 - The site shall dispose of empty, obsolete, and unused chemicals, pesticides, toxic substances, and containers in accordance with requirements and ensure that primary containers are: i. Not reused; ii. Segregated and securely stored prior to collection; and iii. Disposed through an approved vendor.

Response: Compliant

11.6.4.7 - In the event of a hazardous spill, the site shall: i. Have spillage clean-up instructions to ensure that the spill is properly contained; and ii. Be equipped with PPE, spillage kits, and cleaning equipment.

Response: Compliant

Summary -

Response: The site segregates their chemicals in a caged area and room that were locked and properly signed. They had appropriate emergency equipment near these areas. The rooms were away from product storage/production and had sufficient ventilation. The site did not store pesticides in the facility. The site's Inventory document identified their approved chemicals which were appropriate for the industry. The chemical provider records the inventory monthly; the auditor reviewed records from January 22 and February 26, 2026. The auditor observed the chemicals to be properly labeled.

11.6.5 - Loading, Transport, and Unloading Practices

11.6.5.1 - The practices applied during loading, transport, and unloading of food shall be documented, implemented, and designed to maintain appropriate storage conditions and product integrity. Foods shall be loaded, transported, and unloaded under conditions suitable to prevent cross-contamination.

Response: Compliant

11.6.5.2 - Vehicles (e.g., trucks/vans/containers) used for transporting food within the site and from the site shall be inspected prior to loading to ensure they are clean, in good repair, suitable for the purpose, and free from odors or other conditions that may impact negatively on the product.

Response: Compliant

11.6.5.3 - Vehicles (e.g., trucks/vans/containers) shall be secured from tampering using seals or other agreed-upon and acceptable devices or systems.

Response: Compliant

11.6.5.4 - Loading and unloading docks shall be designed to protect the product during loading and unloading. Loading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining product and package integrity during loading and transport.

Response: Compliant

11.6.5.5 - Refrigerated units shall maintain the product at the required temperature. The unit's temperature settings shall be set, checked, and recorded before loading, and the product temperature shall be recorded at regular intervals during loading, as applicable.

Response: Compliant

11.6.5.6 - The refrigeration unit shall be operational at all times and checks completed of the unit's operation, the door seals, and the storage temperature at regular intervals during transit.

Response: Compliant

11.6.5.7 - On arrival, prior to opening the doors, the food transport vehicle's refrigeration unit's storage temperature settings and operating temperature shall be checked and recorded. Unloading shall be completed efficiently, and product temperatures shall be recorded at the start of unloading and regular intervals during unloading.

Response: Compliant

11.6.5.8 - Unloading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining product and package integrity.

Response: Compliant

Summary -

Response: Employees are required to follow the written instructions in "Loading, Transport and Unloading Practices" SOP-004, Version: 05, dated Feb., 10, 2026 – SOP-014, Version: 06 dated Feb. 10, 2026 and SOP-051, Version: 04 dated Jan. 27, 2026 for consistent and acceptable shipping practices. These SOPs includes policies and procedures for loading, transport, and unloading. Outbound shipments of packaged cheese products are shipped in cold storage trailers that are pre-cooled to the appropriate temperatures. All outbound trucks are inspected for cleanliness. Sanitary conditions of the trailers are recorded on the "SOP 014F1 Finished Goods Shipment Form" worksheets. Likewise, all incoming loads are monitored for suitability before unloading begins. Records are maintained on the "SOP 004F1 Incoming Materials Inspection Report" worksheets. The "Load out report" for outgoing trailer inspection on March 3, 4 & 5; June 4, 5 & 6, September 15, 16 & 17, 2025 and January 26, 27 & 28, 2026 were reviewed and indicated with the trailer #, trailer cleanliness (pest, odor), beg time of loading, end time loading, temp @ start, temp @ end, and seal #. Products were loaded under refrigeration and in a timely and efficient manner to maintain product integrity and minimize temperature abuse. Trailers were secured with seals and seal # were documented on the "Load out report" and the BOL. Trailers were pre-cooled prior to loading products and trailer temperature was monitored and maintained. The refrigeration unit, the unit's operation, the door seals and trailer temperature during transit were monitored by the driver and temperature records were maintained as evidenced by the review of the "Transport Temperature log" monitored via "Temptel" recorders.

11.7.1 - High-Risk Processes

11.7.1.1 - The processing of high-risk food shall be conducted under controlled conditions, such that sensitive areas, in which the high-risk food has undergone a "kill" step, a "food safety intervention" or is subject to post-process handling, are protected/segreated from other processes, raw materials, or staff who handle raw materials, to ensure cross-contamination is minimized.

Response: Compliant

11.7.1.2 - Ambient air in high-risk areas shall be tested at least annually to confirm that it does not pose a risk to food safety.

Response: Compliant

11.7.1.3 - Areas in which high-risk processes are conducted shall only be serviced by staff dedicated to that function.

Response: Compliant

11.7.1.4 - Staff engaged in high-risk areas shall change into clean clothing and footwear or temporary protective outerwear when entering high-risk areas. Staff access points shall be located, designed, and equipped to enable staff to change into the distinctive protective clothing and practice a high standard of personal hygiene to prevent product contamination.

Response: Compliant

11.7.1.5 - Product transfer points shall be located and designed, so they do not compromise high-risk segregation and minimize the risk of cross-contamination.

Response: Compliant

Summary -

Response: The manufacturing operation has high-risk areas, which include the shredding/grating/cutting, mixing, and packaging room, since the product is exposed to the environment. These areas are well designed, cleanable and maintained in good condition. Company policy ensures that a high standard of cleanliness is required to enter the processing/packaging room. Employee attire and hygiene are addressed in Elements 11.3.1 to 11.3.3. Entrances into the high-risk processing rooms have hand-washing sinks located before or after entering the room. Ambient air is tested annually for Y & M in February 17, 2026., and confirmed that it does not pose a risk to food safety to food. The processing/packaging room was serviced by staff dedicated to that function. Staff access points were observed to be properly located, designed, and staff donned proper uniform or a lab smock.

11.7.2 - Thawing of Food

11.7.2.1 - Thawing of food shall be undertaken in equipment and rooms appropriate for the purpose. Equipment for water thawing shall be continuous flow to ensure the water exchange rate and temperature do not contribute to product deterioration or contamination. Water overflow shall be directed into the floor drainage system and not onto the floor or shall be appropriately plumbed.

Response: N/A

Evidence: • No thawing of food or ingredient was conducted.

11.7.2.2 - Air thawing facilities shall be designed to thaw food under controlled conditions at a rate and temperature that does not contribute to product deterioration or contamination.

Response: N/A

Evidence: • No thawing of food or ingredient was conducted.

11.7.2.3 - Provision is to be made for the containment and regular disposal of used cartons and packaging from thawed product so that there is no risk to the product.

Response: N/A

Evidence: • No thawing of food or ingredient was conducted.

Summary -

Response: No thawing of food or ingredient was conducted.

11.7.3 - Control of Foreign Matter Contamination

11.7.3.1 - The responsibility and methods used to prevent foreign matter contamination of the product shall be documented, implemented, and communicated to all staff. Inspections shall be performed (refer to 2.5.4.3) to ensure plant and equipment remain in good condition and equipment has not become detached or deteriorated and is free from potential contaminants.

Response: Compliant

11.7.3.2 - Containers, equipment, and other utensils made of glass, porcelain, ceramics, laboratory glassware, or

other similar materials shall not be permitted in food processing /contact zones (except where the product is contained in packaging made from these materials, or measurement instruments with glass dial covers are used, or MIG thermometers are required under regulation). Where glass objects or similar material are required in food handling/contact zones, they shall be listed in a glass inventory, including details of their location and condition.

Response: Compliant

11.7.3.3 - Regular inspections of food handling/contact zones shall be conducted (refer to 2.5.4.3) to ensure they are free of glass or other like material and to establish changes to the condition of the objects listed in the glass inventory.

Response: Compliant

11.7.3.4 - Glass instrument dial covers on processing equipment and MIG thermometers shall be inspected at the start of each shift to confirm they have not been damaged.

Response: N/A

Evidence: • The site does not have glass dial covers or MIG thermometers in the processing areas.

11.7.3.5 - In circumstances where glass or similar material breakage occurs, the affected area shall be isolated, cleaned, thoroughly inspected (including cleaning equipment and footwear), and cleared by a suitably responsible person prior to the start of operations.

Response: Compliant

11.7.3.6 - Wooden pallets and other wooden utensils used in food processing and handling areas shall be dedicated for that purpose, clean, and maintained in good order. Their condition shall be subject to regular inspection.

Response: Compliant

11.7.3.7 - Loose metal objects on equipment, equipment covers, and overhead structures shall be removed or tightly fixed so as not to present a hazard.

Response: Compliant

11.7.3.8 - Knives and cutting instruments used in processing and packaging operations shall be controlled, kept clean, and well maintained. Snap-off blades shall not be used in manufacturing or storage areas.

Response: Compliant

11.7.3.9 - Gaskets, rubber impellers, and other equipment made of materials that can wear or deteriorate over time shall be inspected on a regular frequency (refer to 2.5.4.3).

Response: Compliant

Summary -

Response: The company has several procedures in place to prevent/control contamination from metal, plastic, packaging materials and other physical contaminants. "Control of Foreign Matter Contamination" was recently reviewed to ensure suitable measures are in place. The procedure - SOP-07; SOP-09; SOP-18; SOP-24 & SOP-58 - details the who, where, when, action, reference and record of ensuring the final product is free of extraneous material. The site does not have glass dial covers or MIG thermometers in the processing/storage areas. The procedure required a rejected item to be passed three times in the same orientation. If rejected, then the product is inspected to find the source. If the device does not identify the test pieces, then the product to the last good check is placed on hold. The metal detector is verified annually by a third- party. In case of glass

breakage, the area is isolated, cleaned, inspected and released to production. Any product in the area or ingredients are placed on hold. "Pre-Operational Inspection" in RedZone also restricts the introduction of foreign material in the processing/packaging room. The metal control policy, "Metal Detector Policy" prohibits the use or presence of snap off blade knives and control authorized knife use by sign-in and sign-out program. Packaging materials contain no staples or other potential contaminants. Glass, brittle plastic and similar materials are not allowed in production and storage areas according to "Glass and Brittle Plastic Policy." Records were reviewed for several months and found acceptable. There is a REGISTER and MAP maintained and updated on February 21, 2026 of glass and brittle plastic items in the plant which is verified during monthly internal audits. All lights are shielded or shatterproof in the processing room. There is also a "Knife Control Policy" in place to ensure proper usage of cutting items. Gaskets, rubber impellers, and other equipment made of materials that can wear or deteriorate are inspected by maintenance during PM's. Pallets in use were observed to be in reasonably clean and good condition. Wooden pallets are also used in the warehouse and distribution areas. Visual inspections are conducted weekly on all wooden pallets. Site complies with customer specific requirements.

11.7.4 - Detection of Foreign Objects

11.7.4.1 - The responsibility, methods, and frequency for monitoring, maintaining, calibrating, and using screens, sieves, filters, or other technologies to remove or detect foreign matter shall be documented and implemented.

Response: Compliant

11.7.4.2 - Where detection and/or removal systems are used, the site shall establish limits for detection, based on a risk assessment of the product and its packaging, and identify the location(s) of the detector(s) in the process.

Response: Compliant

11.7.4.3 - Metal detectors or other physical contaminant detection technologies shall be routinely monitored, validated, and verified for operational effectiveness. The equipment shall be designed to isolate defective product and indicate when it is rejected.

Response: Compliant

11.7.4.4 - Records shall be maintained of the inspection of foreign object detection devices, of any products rejected or removed by them, and of corrective and preventative actions resulting from the inspections.

Response: Compliant

11.7.4.5 - In all cases of foreign matter contamination, the affected batch or item shall be isolated, inspected, reworked, or disposed of. Records shall be maintained of the disposition.

Response: Compliant

Summary -

Response: Cheese Merchants of America, LLC has a robust foreign matter control program in place. Pre-Operational Inspections are performed to ensure that plant and equipment remain in good condition; equipment has not become detached and/or deteriorated. Processing room operators are responsible for maintaining the processing room free from physical contamination risks. The high-risk packaging room has eighteen (17) packaging lines; each line has a "METAL DETECTOR" or "X-ray". Foreign Material - unforeseen is a critical control point. Metal detectors and X-rays are located immediately after packaging cheese containers. Metal detector/X-ray sensitivity is checked at the production start up, and every two hours, with records maintained. The facility has limits set at: Fe -3.0 mm, Non-Fe 3.5 mm, SS - 4.5 mm; SS - 1.5 mm and SS - 2.0 mm

soda-lime glass for customer-specific testing with an X-Ray. The company has proven that the metal detector and X-Ray will detect glass, plastic and hard foreign objects. The effective operation of the Metal Detector and the X-Ray was verified during the audit with a review of real-time metal detection records. Site complies with customer specific requirements.

11.8.1 - Waste Disposal

11.8.1.1 - The responsibility and methods used to collect and handle dry, wet, and liquid waste and how to store it prior to removal from the premises shall be documented and implemented.

Response: Compliant

11.8.1.2 - Waste shall be removed on a regular basis and not allowed to build up in food handling or processing areas. Designated waste accumulation areas shall be maintained in a clean and tidy condition until external waste collection is undertaken.

Response: Compliant

11.8.1.3 - Waste and overflow water from tubs, tanks, and other equipment shall be discharged directly to the floor drainage system or by an alternative method that meets local regulatory requirements.

Response: Compliant

11.8.1.4 - Trolleys, vehicle waste disposal equipment, collection bins, and storage areas shall be maintained in a serviceable condition, cleaned, and sanitized regularly to prevent the attraction of pests and other vermin.

Response: Compliant

11.8.1.5 - Adequate provision shall be made for the disposal of all solid processing waste, including trimmings, inedible material, and used packaging.

Response: Compliant

11.8.1.6 - Where applicable, a documented procedure shall be in place for the controlled disposal of trademarked materials waste considered high-risk for handling or other reasons. Where a contracted disposal service is used, the disposal process shall be reviewed regularly to confirm compliance.

Response: Compliant

11.8.1.7 - Inedible waste designated for animal feed shall be stored and handled so that it will not cause a risk to the animal or further processing. If denaturant is used to identify inedible waste, it shall be demonstrated that it does not pose a risk to animal health.

Response: Compliant

11.8.1.8 - Waste held on-site prior to disposal shall be stored in a separate storage facility that is suitably insect proofed and located where it does not present any hazards.

Response: Compliant

11.8.1.9 - Adequate provision shall be made for the disposal of all liquid waste from processing and food handling areas. Liquid waste shall either be removed from the processing environment continuously or held in a designated storage area in lidded containers prior to disposal where it does not present any hazards.

Response: Compliant

11.8.1.10 - Reviews of the effectiveness of waste management shall form part of regular site inspections (refer to

2.5.4.3), and the results of these inspections shall be included in the relevant inspection reports.

Response: Compliant

Summary -

Response: The "Waste Disposal" SOP-028, Version: 4 dated January 20, 2026 documented the methods and responsibility to maintain and eliminate any accumulation of solid or liquid waste. The Maintenance Manager and the Waste Services are responsible for this program. Waste collection, trash bins and compactor storage observed were clean and in serviceable condition at the time of the audit. Solid waste held on site is collected in a closed trash compactor and removed from the premises weekly or as needed. Liquid waste passes through a Clean Water Technology GEM (Gas Enemy Mixing System). Liquid waste (cleaning water) is removed from the facility to the waste pre-treatment tanks where the pH, BOD, COD and total solids are maintained prior to discharge to the city sewage treatment plant and other solid waste is removed from the facility by a hauler for incineration. The facility has a grease interceptor in the maintenance shop. Non-edible cheese removal is contracted to an outside company. Non-edible cheese is shipped to animal feed. There is no evidence of hazards present as a result of liquid waste removal. To prevent resale or misuse, all trademarked labels must be placed in compactor and properly destroyed before the leave the facility.

12.1.1 - Premises Location and Approval

12.1.1.1 - The site shall assess local activities and the site environment to identify any risks that may have an adverse impact on product safety and implement controls for any identified risks. The assessment shall be reviewed in response to any changes in the local environment or activities. The construction and ongoing operation of the premises on the site shall be approved by the relevant authority.

Response: Compliant

Summary -

Response: The site's buildings, property and surroundings and local activities were observed during the audit to not pose a food safety risk to products. Measures have been established to maintain a suitable external environment, and the facility performs external inspections as part of its internal audit program. The last external inspection was performed by the Illinois Department of Health in November 13, 2025 and reviewed by management. There were no non-conformances related to the site's environment noted on a recent regulatory inspection report. Both site, CMA and WC maintains the required approvals by relevant authorities, as evidenced by FDA Registration No. ***** 1714-CMA (last four digits) and FDA Registration No. ***** 4844-WC (las four digits) which expire on December 31, 2026 and Illinois Dept. of Health "Dairy Food Registration No. 17-522" for its ongoing operations.

12.1.2 - Building Materials

12.1.2.1 - Floors shall be constructed of smooth, dense, impact-resistant material that can be effectively graded, drained, is impervious to liquid, and easily cleaned. When drains are present in the warehouse, floors shall be sloped at gradients suitable to allow for the effective removal of all overflow or wastewater under normal working conditions.

Response: Compliant

12.1.2.2 - Drains shall be constructed and located so they can be easily cleaned and do not present a hazard. Drains if located in storage and handling areas, shall be kept clean.

Response: Compliant

12.1.2.3 - Waste trap system shall be located away from any food handling or storage area or entrance to the premises.

Response: Compliant

12.1.2.4 - Walls, partitions, ceilings, and doors shall be of durable construction. Internal surfaces shall have an even and regular surface and be impervious with a light-colored finish and shall be kept clean (refer to 12.2.5). Wall-to-wall and wall-to-floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of food debris.

Response: Compliant

12.1.2.5 - Doors shall be of solid construction. Windows shall be made of shatterproof glass or similar material, or otherwise protected.

Response: Compliant

12.1.2.6 - Drop ceilings (where applicable) shall be constructed to enable monitoring for pest activity, facilitate cleaning, and provide access to utilities.

Response: Compliant

12.1.2.7 - In warehouses where food products are recouped or exposed, the product contact surfaces shall be constructed of materials that will not contribute a food safety risk

Response: N/A

Evidence: • No products are recouped or exposed in the warehouse.

Summary -

Response: Floors are constructed of smooth and dense impact-resistant material and properly graded for effective drainage of overflow or wastewater. The ceilings in all food storage areas are constructed of insulated panels, which are easily cleaned and prevent product contamination. Waste trap systems are located away from storage area or entrance to the premises. Wastewater during the audit was observed to be properly discharged. Drains were observed to be located and constructed for ease of cleaning and inspection. Walls, ceilings and doors are of durable construction with smooth and light colored surfaces. These areas were observed to be clean during the audit tours. Wall-to-wall and wall-to-floor junctions were observed to be sealed and free of debris. Doors, windows and frames in product areas were observed to be properly constructed of materials with the same functional requirements as internal walls and partitions. The ceilings are constructed of insulated metal panels, which are easily cleaned and prevent product contamination. No products are recouped or exposed in the warehouse.

12.1.3 - Lighting and Light Fittings

12.1.3.1 - Lighting in warehouses where food product is recouped or exposed shall be of appropriate intensity to enable the staff to carry out their tasks efficiently and effectively.

Response: Compliant

12.1.3.2 - Light fittings in areas where food product is recouped or exposed shall be shatterproof, manufactured with a shatterproof covering or fitted with protective covers, and recessed into or fitted flush with the ceiling.

Response: Compliant

12.1.3.3 - Light fittings in other areas of the warehouse where product is covered or otherwise protected shall be designed to prevent breakage and product contamination.

Response: Compliant

Summary -

Response: Lighting was of the appropriate intensity for employees to carry out their tasks efficiently. All lighting is either covered or is shatter-proof.

12.1.4 - Dust, Insect, and Pest Proofing

12.1.4.1 - All external windows, ventilation openings, doors, and other openings shall be effectively sealed when closed and proofed against dust, insects, birds, and other pests. External personnel access doors shall be provided. They shall be effectively insect-proofed and fitted with a self-closing device and proper seals to protect against entry of dust, birds, and other pests.

Response: Compliant

12.1.4.2 - Electric insect control devices, pheromone, or other traps and baits shall be located and operate so as not to present a contamination risk to the product, packaging, containers, or processing equipment. Poison rodenticide bait shall not be used inside ingredient of product storage areas where ingredients, packaging, and product are handled, processed, or exposed.

Response: Compliant

Summary -

Response: External windows, doors and other openings were observed during facility tours to be properly sealed to prevent any pest infestation or dust coming into the facility. External personnel doors were observed to be self-closing and sealed to prevent dust and pest ingress. All external doors and dock doors were sealed to prevent infestation. Electric insect devices and interior and exterior rodent stations are located so that the product is not at risk for contamination. Rodenticide bait is only used on the outside of the facility.

12.1.5 - Ventilation

12.1.5.1 - Adequate ventilation shall be provided in enclosed storage and food handling areas.

Response: Compliant

12.1.5.2 - All ventilation equipment and devices in product storage and handling areas shall be adequately cleaned as per 12.2.5 and effectively sealed against dust, insects, and other pests as per 12.1.4.

Response: Compliant

Summary -

Response: Ventilation is adequate in the ambient warehouse. All HVAC systems are managed through an outside contractor. Exterior screening was observed on all vent pipes and fans around the facility to address the risk of pests.

12.1.6 - Equipment and Utensils

12.1.6.1 - Specifications for equipment and utensils and procedures for purchasing equipment shall be documented and implemented.

Response: Compliant

12.1.6.2 - Equipment and utensils shall be designed, constructed, installed, operated, and maintained to meet any applicable regulatory requirements and not pose a contamination threat to products.

Response: Compliant

12.1.6.3 - Equipment storage rooms shall be designed and constructed to allow for the hygienic and efficient storage of equipment and containers. Where possible, food contact equipment shall be segregated from non-food contact equipment.

Response: Compliant

12.1.6.4 - All equipment and utensils shall be cleaned (refer to 12.2.5.1) at a frequency to control contamination and stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination.

Response: Compliant

12.1.6.5 - Vehicles used in handling areas or in cold storage rooms shall be designed, cleaned, and operated so as not to present a food safety hazard.

Response: Compliant

12.1.6.6 - In addition to the above, locations handling exposed products and recouping products on-site shall have:
i. Product contact equipment and utensils constructed of materials that are non-toxic, smooth, impervious and readily cleaned as per 12.2.5; ii. Clearly identified equipment and utensils that are used for inedible material; and
iii. Clearly identified waste and overflow handling equipment and utensils. The waste material is discharged hygienically and according to local regulatory requirements.

Response: Compliant

Summary -

Response: Specifications for the site's equipment, utensils and purchase procedures for equipment are documented in 11.1. Site Location and Construction Process Control SOP were seen to be appropriately implemented. Equipment and utensils are designed constructed and installed to meet regulatory requirements and prevent risks of contamination of the product. These items were found to be cleaned and stored properly after use to prevent cross-contamination. Equipment surfaces were observed to be smooth, impervious and free from cracks and crevices. Containers and bins are made of non-toxic materials and are labeled or color-coded, for appropriate use with either edible or non-edible materials. The site has implemented an effective documented storage plan for the storage of raw materials, ingredients, packaging, equipment and chemicals. Forklifts and other vehicles in processing areas and storage areas were observed not to present a food hazard. The site has written procedures for withholding non-conforming equipment in the document "Non-Conforming Materials and Product Hold Procedure", which were found to be properly implemented in the facility.

12.1.7 - Grounds and Roadways

12.1.7.1 - The grounds and area surrounding the premises shall be maintained to minimize dust and kept free of waste or accumulated debris so as not to attract pests and vermin.

Response: Compliant

12.1.7.2 - Paths, roadways, and loading and unloading areas shall be maintained so as not to present a hazard to

the food safety operation of the premises.

Response: Compliant

12.1.7.3 - Surroundings shall be kept neat and tidy and shall not present a hazard to the hygienic and sanitary operation of the premises or provide harborage for pests.

Response: Compliant

Summary -

Response: Building grounds were adequately maintained by the company. The perimeter surrounding the building (for both sites - "Bartlett CMA" and "West Chicago" WC) were free of waste, old equipment and accumulated debris. Ornamental shrubs were cut back from the building walls. The roadways and parking lots were maintained in a safe condition and do not pose a food safety threat. The roadways and parking lots contained several storm water runoff drains and manhole covers which prevent standing water and mud. The surroundings were observed to be neat and tidy and do not present a hazard to the hygienic and sanitary operation of the premises.

12.2.1 - Repairs and Maintenance

12.2.1.1 - The methods and responsibility for the maintenance and repair of facility, equipment, and buildings shall be documented, planned, and implemented in a manner that minimizes the risk of product, packaging, or equipment contamination.

Response: Compliant

12.2.1.2 - The maintenance schedule shall be prepared to cover building, equipment, and other areas of the premises critical to the maintenance of product safety. Routine maintenance of plant and equipment in any food handling or storage area shall be performed according to a maintenance control schedule and recorded.

Response: Compliant

12.2.1.3 - Failures of facility and equipment in any food storage and handling area shall be documented, reviewed, and necessary repair incorporated into the maintenance control schedule.

Response: Compliant

12.2.1.4 - Site supervisors shall be notified when maintenance or repairs are to be undertaken in any food handling or storage area.

Response: Compliant

12.2.1.5 - The maintenance supervisor and the site supervisor shall be informed if any repairs or maintenance pose a potential threat to product safety (e.g., pieces of electrical wire, damaged light fittings, and loose overhead fittings). When possible, maintenance is to be conducted outside operating times.

Response: Compliant

12.2.1.6 - Temporary repairs, where required, shall not pose a food safety risk and shall be included in the cleaning program. There shall be a plan in place to address completion of temporary repairs to ensure they do not become permanent solutions.

Response: Compliant

12.2.1.7 - Equipment located over exposed product shall be lubricated with food grade lubricants and their use

controlled to minimize the contamination of the product.

Response: Compliant

12.2.1.8 - Paint used in a food handling or contact zone shall be suitable for use, in good condition (i.e., no chips), and shall not be used on any product contact surface.

Response: Compliant

Summary -

Response: The "Preventative Maintenance" SOP-10, Version 04, dated February 10, 2026 was documented and implemented and cover both sites, CAM and WC. The responsibility for the maintenance and repair of plant, equipment and buildings is the Maintenance Manager. The current maintenance schedule prepared covers building, equipment and other areas of the premises critical to the maintenance of product Safety and Quality. The failure of plant and equipment issues is documented and reviewed by the Maintenance Manager on January 16, 2026. Maintenance Supervisor or Production Supervisor are notified of repair to be taken or breakage in any food handling area. No temporary repairs, loose electrical wire, loose fittings, taped equipment and over over-lubricated equipment was observed during the audit. Maintenance staff and contractors remove all tools and debris from any maintenance activity when completed and inform the area Sanitation Supervisor and Quality Supervisor if sanitation is required. Tools collection, sanitation and debris removal from equipment and the operator is notified for sanitation after repairs. The yearly PM work orders for the "Back flow preventer device" dated January 11, 2026, was properly documented and reviewed at this audit. All electronic records were maintained and reviewed in RedZone software. The SDS for the "Fluorescent Yellow Spray Paint" were verified and was appropriate for use in the plant.

12.2.2 - Maintenance Staff and Contractors

12.2.2.1 - Maintenance staff and contractors shall comply with the site's personnel and process hygiene requirements (refer to 12.3).

Response: Compliant

12.2.2.2 - All maintenance staff and contractors required to work on-site shall be trained in the site's food safety and hygiene procedures or shall be escorted at all times until their work is completed. Records of training shall be documented and retrievable.

Response: Compliant

12.2.2.3 - Maintenance staff and contractors shall remove all tools and debris from any maintenance activity once it has been completed and inform the area supervisor and maintenance supervisor so that appropriate hygiene and sanitation can be completed and an inspection conducted prior to restarting site operations. The inspections shall be documented.

Response: Compliant

Summary -

Response: Maintenance staff and contractors need to comply with the site's GMPs and food safety requirements. Maintenance and contractors were observed following GMP's. Maintenance employees and contractors are trained on the site's GMP's and are escorted. When maintenance occurs on a product contact surface, the area is cleaned. The areas are inspected by the supervisors prior to use. Tools collection, sanitation and debris removal from equipment and operator is notified for sanitation after repairs was observed on the "Post maintenance Work-Order - RedZone".

12.2.3 - Calibration

12.2.3.1 - The methods and responsibility for calibration and re-calibration of measuring, testing, and inspection equipment used for monitoring activities outlined in prerequisite programs, food safety plans, and other process controls, or to demonstrate compliance with customer specifications, shall be documented and implemented. Software used for such activities shall be validated and secured as appropriate.

Response: Compliant

12.2.3.2 - Equipment shall be calibrated against national or international reference standards and methods or to an accuracy appropriate to its use. In cases where standards are not available, the site shall provide evidence to support the calibration reference method applied. A list of measuring, testing, and inspection equipment requiring calibration shall be maintained.

Response: Compliant

12.2.3.3 - Calibration shall be performed according to regulatory requirements and/or to the equipment manufacturers' recommended schedule.

Response: Compliant

12.2.3.4 - Procedures shall be documented and implemented to address the disposition of potentially affected products should measuring, testing, and inspection equipment be found to be out of calibration state.

Response: Compliant

12.2.3.5 - A directory of measuring, testing, and inspection equipment requiring calibration and records of calibration tests shall be maintained.

Response: Compliant

Summary -

Response: There is a calibration and verification program being actively implemented at Cheese Merchants of America, LLC. Procedure "Calibration" SOP-023, Version: 05 dated December 1, 2025 provides instruction for maintaining the accuracy of equipment/instruments necessary for processing cheese. The "Calibration Directory & Records" ensures calibrations of equipment/instruments are completed on a scheduled basis. It was reviewed on February 23, 2026. External service providers are used to calibrate equipment on a scheduled basis. Thermometers (Traceable Products) purchase every other year; Scales are calibrated annually by "Acme" lasted calibration was conducted July 10, 2025. Calibration certificates from service providers were reviewed and found acceptable. Equipment such as scales and thermometers has been calibrated against national or international reference standards.

12.2.4 - Pest Prevention

12.2.4.1 - A documented pest prevention program shall be effectively implemented. It shall: i. Describe the methods and responsibility for the development, implementation, and maintenance of the pest prevention program; ii. Record pest sightings and trend the frequency of pest activity to target pesticide applications; iii. Outline the methods used to prevent pest problems; iv. Outline the pest elimination methods and the appropriate documentation for each inspection; v. Outline the frequency with which pest status is to be checked; vi. Include on a site map the identification, location, number, and type of applied pest control/ monitoring devices; vii. List the chemicals used. They are required to be approved by the relevant authority and their Safety Data Sheets (SDS) made available; viii. Outline the methods used to make staff aware of the bait control program and the measures

required when they come into contact with a bait station; ix. Outline the requirements for staff awareness and training in the use of pest and vermin control chemicals and baits; and x. Measure the effectiveness of the program to verify the elimination of applicable pests and identify trends.

Response: Compliant

12.2.4.2 - Pest contractors and/or internal pest controllers shall: i. Be licensed and approved by the local relevant authority; ii. Use only trained and qualified operators who comply with regulatory requirements; iii. Use only approved chemicals; iv. Provide a pest prevention plan (refer to 12.2.4.1), which includes a site map indicating the location of bait stations traps and other applicable pest control/monitoring devices; v. Report to a responsible authorized person on entering the premises and after the completion of inspections or treatments; vi. Provide regular inspections for pest activity with appropriate action taken if pests are present, and vii. Provide a written report of their findings and the inspections and treatments applied.

Response: Compliant

12.2.4.3 - Pest activity risks shall be analyzed and recorded. Inspections for pest activity shall be undertaken on a regular basis by trained site personnel and the appropriate action taken if pests are present. Identified pest activity shall not present a risk of contamination to food products, raw materials, or packaging. Records of all pest control inspections and applications shall be maintained.

Response: Compliant

12.2.4.4 - Food products, raw materials, or packaging that are found to be contaminated by pest activity shall be effectively disposed of and the source of pest infestation investigated and resolved. Records shall be kept of the disposal, investigation, and resolution.

Response: Compliant

12.2.4.5 - Pesticides shall be clearly labeled and stored per 12.6.4 if kept on-site.

Response: N/A

Evidence: • Pesticides were not stored on site.

12.2.4.6 - No animals shall be permitted on-site in food handling or storage areas.

Response: N/A

Evidence: • Animals were not permitted in the facility.

Summary -

Response: Site MAC: "Cheese Merchants of America, LLC - 1301 Schiferl Rd, Bartlett, IL 60103 (CMA)". "Pest Prevention" provides instruction for the company's pest control activities. Professional pest control services are provided by "McCloud Pest Solutions". Monthly service visits are provided for external areas and internal areas 2 times per month. External bait stations (40) and internal traps (80) are in correct locations to protect the facility. There are 8 insect light traps that have been placed so as not to attract insects into the plant. The Pest Control Operator's license expires on December 31, 2026. "McCloud Services" are licensed by the "Illinois Department of Health" with December 31, 2026 expiration. Their insurance plan expires October 1, 2026. No pesticides or pesticide control application devices are stored on site. Monthly review of the PCO service report are reviewed and verified by the Sanitation Supervisor. All recommendations have been implemented at the time of this audit. The map of pest control traps was recently signed by the pest control operator on January 8, 2026. The pest control operator's service reports for several months, and revealed a low level flying insect activity. The Insect light bulbs were replaced on April 23, 2025. No animals are permitted onsite. Site WC:

"Cheese Merchants of America, LLC - 2965 Enterprise Cir, West Chicago IL 60185 (WC)". "Pest Prevention" provides instruction for the company's pest control activities. Professional pest control services are provided by "McCloud Pest Solutions". Monthly service visits are provided for external areas and internal areas 2 times per month. External bait stations (42) and internal traps (64) are in correct locations to protect the facility. There are 16 insect light traps that have been placed so as not to attract insects into the plant. The Pest Control Operator's license expires on December 31, 2026. "McCloud Services" are licensed by the "Illinois Department of Health" with December 31, 2026 expiration. Their insurance plan expires October 1, 2026. No pesticides or pesticide control application devices are stored on site. Monthly review of the PCO service report are reviewed and verified by the Sanitation Supervisor. All recommendations have been implemented at the time of this audit. The map of pest control traps was recently signed by the pest control operator on January 8, 2026. The pest control operator's service reports for several months, were reviewed and revealed a low pest activity in the outside areas of the facility. The Insect light bulbs were replaced on April 23, 2025. No animals are permitted onsite.

12.2.5 - Cleaning and Sanitation

12.2.5.1 - The methods and responsibility for the effective cleaning of the food storage and handling areas, staff amenities, and toilet facilities shall be documented and implemented. Consideration shall be given to: i.What is to be cleaned; ii.How it is to be cleaned; iii.When it is to be cleaned; iv.Who is responsible for cleaning; v.Validation of cleaning procedures; vi.Methods used to confirm the correct concentrations of detergents and sanitizers, and vii.The responsibility and methods used to verify the effectiveness of the cleaning and sanitation program.

Response: Compliant

12.2.5.2 - Detergents and sanitizers shall be suitable for use in a food and storage and handling environment, labeled according to regulatory requirements, and purchased in accordance with applicable legislation. The organization shall ensure: i.The site maintains a list of chemicals approved for use; ii.An inventory of all chemicals purchased and used is maintained; iii.Detergents and sanitizers are stored as outlined in element 12.6.4; iv.Safety Data Sheets (SDS) are provided for all detergents and sanitizers purchased; and v.Only trained staff handle sanitizers and detergents.

Response: Compliant

12.2.5.3 - Detergents and sanitizers that have been mixed for use shall be correctly mixed according to manufacturers' instructions, stored in containers that are suitable for use, and clearly identified. Mix concentrations shall be verified and records maintained.

Response: Compliant

12.2.5.4 - Provision shall be made for the effective cleaning of equipment, utensils, and protective clothing.

Response: Compliant

12.2.5.5 - Cleaning equipment, tools, racks, and other items used in support of the cleaning and sanitizing program shall be clearly identified, stored, and maintained in a manner that prevents contamination of processing, product handling equipment, and storage areas as well as the tools themselves.

Response: Compliant

12.2.5.6 - Staff amenities, sanitary facilities, and other essential areas shall be inspected by qualified personnel to ensure the areas are clean and at a defined frequency.

Response: Compliant

12.2.5.7 - Records of cleaning and sanitation activities, verification, and inspections shall be maintained.

Response: Compliant

12.2.5.8 - Staff amenities, sanitary facilities, and other essential areas shall be inspected by qualified personnel at a defined frequency to ensure the areas are clean.

Response: Compliant

Summary -

Response: The site has a Cleaning and Sanitation Program that describes the methods and responsibilities for cleaning of processing equipment, the environment, storage areas, bathrooms and break rooms. The "Spartan" chemical is identified as a cleaning chemical provider. Spartan sanitation manual was available and reviewed at the time of the audit. Sanitation Standard Operating Procedures are written and include what is cleaned, chemical usage (concentrations), cleaning methods and who is responsible. A master sanitation plan includes all areas of the facility with frequencies and responsibilities for deep cleaning. A review of the plan for April, 2025 thru February 2026, showed cleaning tasks were completed as scheduled. There is a suitable area for cleaning containers, knives, cutting boards and other utensils that does not cause a food product contamination. A verification schedule includes the methods, frequencies and responsibilities for verifying the effectiveness of cleaning methods. Cleaning materials are stored securely and properly labeled with SDS information available to all employees. Chemicals Chlorinated Degreaser and PAA (Parectic Acid) Sanitizer were observed to be included on a list of approved chemicals, labeled consistent with regulations and had SDS on hand. Dispensed cleaning chemicals were properly stored and identified. Cleaning chemicals mixed on-site have concentration checks conducted by the Sanitation Supervisor and recorded in Titration Check Log. Sanitation personnel are properly trained in cleaning methods and the safe use of chemicals. The last chemical handling training was conducted February 26, 2026. Cleaning equipment, tools and racks used in the sanitation processes are labeled and maintained in a sanitary condition and are stored in the sanitation area after use. The Sanitation Supervisor reviews and approves the cleaning and sanitation program with daily records maintained.

12.3.1 - Personnel Welfare

12.3.1.1 - Personnel suffering from infectious diseases or who are carriers of any infectious disease shall be restricted from working on the site or in the transportation of food and shall not engage in food handling operations or be permitted access to storage areas where the product is exposed or there is a risk of contamination of food.

Response: Compliant

12.3.1.2 - The site shall have measures in place to prevent contact of materials, ingredients, food packaging, food, or food contact surfaces from any bodily fluids from open wounds, coughing, sneezing, spitting, or any other means. In the event of an injury that causes spillage of bodily fluid, a properly trained staff member shall ensure that all affected areas, including handling and storage areas, have been adequately cleaned and that all materials and products have been quarantined and/or disposed of.

Response: Compliant

12.3.1.3 - Personnel with exposed cuts, sores, or lesions shall not engage in handling exposed products, recoup, repack or processing products, or handling primary packaging or food contact surfaces. Minor cuts or abrasions on exposed parts of the body shall be covered with a protective bandage or alternative suitable dressing. A colored bandage or alternative suitable waterproof and colored dressing is recommended for handling exposed products,

recoup, or repack processes.

Response: Compliant

Summary -

Response: No employees with an obvious illness were observed in the facility. The Employee GMP manual informs employees to stay home if they are ill. This is also covered during orientation. Visitors are not allowed into the facility if they are ill. Employees are trained on Blood Borne pathogens. The Safety Team is responsible for overseeing the cleaning of bodily fluid spills. QA will inspect the area after sanitation has been completed. There were no employees observed with open cuts or sores. Blue metal detectable band aids were available to employees if required.

12.3.2 - Handwashing

12.3.2.1 - All personnel shall have clean hands and hands shall be washed by all staff, contractors, and visitors: i.On entering food handling, storage, and processing areas; ii.After each visit to a toilet; iii.After using a handkerchief; iv.After smoking, eating, or drinking; and v.After sneezing or coughing.

Response: Compliant

12.3.2.2 - Handwash stations shall be available and accessible as required.

Response: Compliant

12.3.2.3 - Handwash stations shall be constructed of stainless steel or similar non-corrosive material and at a minimum supplied with: i.A potable water supply at an appropriate temperature; ii.Liquid soap; iii.Paper towels; and iv.A means of containing used paper towels. An effective hand dryer may be used in instances where there is no direct hand contact of food or food contact surfaces.

Response: Compliant

12.3.2.4 - Signage in appropriate languages instructing people to wash their hands shall be provided in a prominent position.

Response: Compliant

12.3.2.5 - When gloves are used, personnel shall maintain the handwashing practices outlined above.

Response: Compliant

Summary -

Response: A policy covering hand washing requirements has been documented and implemented. Hand wash basins are located at appropriate employee access points to processing areas. Hand wash sinks are made of non-corrosive materials and supplied with tempered potable water. Soap in a fixed dispenser, paper towels and waste containers are available. Hands-free operated taps and hand sanitizers are available in all areas of the facility. Signs are posted reminding employees to wash their hands before returning to work. Signs are posted at hand wash stations and in bathrooms. Employees are required to wash hands when wearing gloves. Interviews conducted during the audit demonstrated that employees understand the hand washing requirements. Employees were observed to wash their hands properly during the audit and to use proper glove procedures.

12.3.3 - Clothing and Personal Effects

12.3.3.1 - Clothing worn by staff engaged in handling food shall be maintained, stored, laundered, and worn so as not to present a contamination risk to products.

Response: Compliant

12.3.3.2 - Clothing, including shoes, shall be clean at the commencement of each shift and maintained in a serviceable condition.

Response: Compliant

12.3.3.3 - Protective clothing shall be manufactured from material that will not pose a food safety threat and is easily cleaned.

Response: Compliant

12.3.3.4 - Jewelry and other loose objects shall not be worn or taken into a food handling or processing operation or any area where food is exposed. The wearing of plain bands with no stones, prescribed medical alert bracelets, or jewelry accepted for religious or cultural reasons can be permitted, provided it is properly covered and does not pose a food safety risk. All exceptions shall meet regulatory and customer requirements and shall be subject to a risk assessment and evidence of ongoing risk management.

Response: Compliant

Summary -

Response: Uniform observed on employees are in good repair and provided by “UniFirst Uniform Services”. All employees are required to wear disposable smocks, hairnets, masks and shoe covers in the cheese processing and packaging areas. The company also provides single-service gloves and has a “Glove Policy” to provide instructions to employees for glove practices. Employees are not permitted to wear jewelry except a plain wedding ring. Disposable gloves were changed after breaks and when they became soiled. Protective clothing was manufactured from appropriate materials.

12.3.4 - Visitors

12.3.4.1 - All visitors shall be required to comply with all Good Storage and Distribution Practices and hygiene standards required by the site, including those applying to clothing and personal effects, hand-washing, and illness (refer to 12.3.1, 12.3.2 and 12.3.3).

Response: Compliant

12.3.4.2 - All visitors, including management staff, shall wear suitable clothing and footwear when entering any food storage and handling area.

Response: Compliant

12.3.4.3 - Visitors exhibiting visible signs of illness shall be prevented from entering areas in which food is handled or processed (refer to 12.3.1).

Response: Compliant

12.3.4.4 - Visitors shall enter and exit food handling areas through the proper staff entrance points and comply with all handwashing and personnel practice requirements.

Response: Compliant

12.3.4.5 - All visitors shall be trained in the site’s food safety and hygiene procedures before entering any food

processing or handling areas or shall be escorted at all times in food handling and storage areas.

Response: Compliant

12.3.4.6 - The site shall have a documented procedure for how driver access is managed to minimize food safety risk and designated driver areas are maintained to prevent food contamination or other food safety risks.

Response: Compliant

Summary -

Response: Visitors are required to read and sign off on the food safety and hygiene procedures prior to entering the storage areas. Visitors are escorted at all times. Everyone is required to remove jewelry and loose items from above the waist. Suitable clothing and footwear was required. Everyone must enter through the proper doorways, wash hand and follow GMP requirements. Driver access is managed and designated areas are maintained for them; they do not have access to the interior of the facilities.

12.3.5 - Staff Amenities (change rooms, toilets, break rooms)

12.3.5.1 - Staff amenities shall have documented cleaning procedures, be supplied with appropriate lighting and ventilation, and shall be made available for the use of all persons engaged in the handling and processing of product.

Response: Compliant

12.3.5.2 - Provision shall be made for staff to store their street clothing and personal items separate from food contact zones and food storage areas.

Response: Compliant

12.3.5.3 - Toilet rooms shall be: i. Designed and constructed so that they are accessible to staff and separate from any food handling operations; ii. Accessed from the warehouse or food handling area via an airlock vented to the exterior or through an adjoining room; iii. Sufficient in number for the maximum number of staff; iv. Constructed so that they can be easily cleaned and maintained; and v. Kept clean and tidy.

Response: Compliant

12.3.5.4 - Sanitary drainage shall not be connected to any other drains within the premises and shall be directed to a septic tank or a sewerage system. Procedure shall be documented and implemented to properly manage sewage back-ups to minimize the potential for contamination.

Response: Compliant

12.3.5.5 - Handwash basins shall be provided immediately outside or inside the toilet room and designed as outlined in 12.3.2.2.

Response: Compliant

12.3.5.6 - Separate break room facilities shall be provided away from a food handling or storage areas. Break rooms shall be kept clean and tidy and free from waste materials and pests.

Response: Compliant

12.3.5.7 - Where outside eating areas are provided, they shall be kept clean and free from waste materials and maintained in a manner that minimizes the potential for introduction of contamination including pests to the site.

Response: Compliant

12.3.5.8 - Signage in languages understood by staff advising people to wash their hands before entering the food storage areas shall be provided in a prominent position in break rooms and break room exits.

Response: Compliant

Summary -

Response: Employee bathrooms and break rooms were observed to be appropriately lit and ventilated and available for all personnel at the facility. There are facilities for employees to change into and out of protective clothing. Provisions have been made for storage of street clothing and personal items and are separate from processing and storage areas. Change rooms are provided for employees working in all areas. Showers are not provided for employee use. Restrooms and washrooms were observed to be separate from food processing and handling areas and accessed via a separate room or airlock. Tools used in cleaning of the restrooms are dedicated and not used in other areas of the site. An area has been provided for the storage of outer coats and other items while using the facilities. Sanitary facilities were observed to be sufficient in number for all employees and were cleaned and maintained on a scheduled basis. An interview with Quality Assurance Manager and the Sanitation Manager, combined with onsite observations provided satisfactory evidence that sanitary drainage is separated from plant drainage and that it is disposed of in accordance with regulations. The sanitary facilities have hand wash sinks that comply with the requirements of the SQF Code. Breakrooms that are properly separated from production are available, well lit, properly ventilated and are appropriately sized for the number of facility employees. Lunchrooms include hot and cold potable water, food storage areas, refrigerators with hand and utensil washing capabilities. Outside eating areas are not provided. Signs reminding employees to wash their hands before returning to work were observed at the exit to lunchrooms and in or adjacent to outside eating areas where applicable, in languages understood by staff. Lunchrooms were observed to be clean and well-maintained during the audit tours. Documented cleaning procedures are available for the staff amenities. Staff amenities are cleaned as part of the master sanitation schedule.

12.4.1 - Personnel Processing Practices

12.4.1.1 - All personnel shall comply with the following practices: i. Personnel entry to food handling areas shall be through the personnel access doors only; ii. All doors are to be kept closed. Doors shall not be left open for extended periods when access is required for waste removal or stock transfer; iii. The wearing of false fingernails or fingernail polish is not permitted when handling exposed food; iv. Materials and products shall be kept in appropriate containers as required and off the floor; v. Waste shall be contained in the bins identified for this purpose and removed from the operational area on a regular basis and not left to accumulate; vi. Staff shall not eat or taste any product in the food storage or handling area; vii. Smoking, chewing, eating, or spitting is not permitted in any food handling or storage areas; and viii. Drinking of water is permissible only under conditions that prevent contamination or other food safety risks from occurring. Drinking water containers shall be stored in clear, covered containers, and used in designated areas only. Code Amendment #1 A medical screening procedure shall be in place for all employees, visitors and contractors who handle exposed product or food contact surfaces.

Response: Compliant

12.4.1.2 - All personnel engaged in storage, transport, and handling of packaged products and materials shall ensure that products and materials are handled and stored in such a way as to prevent damage or product contamination.

Response: Compliant

Summary -

Response: Personnel processing procedures for all employees are documented and implemented. All packaging materials were observed stored properly and off the floor in sealed boxes. Employees were observed entering the processing areas through the proper doorways and washing hands. Waste was properly stored. There was no evidence of eating or drinking in the processing or storage areas. No false finger nails were observed. Hairnets and beard guards were properly worn. The flow of personnel was controlled. Product evaluations were conducted in designated areas that were well lit and appropriately equipped for that purpose and personnel conducting sensory evaluations are trained and maintain high hygienic standards.

12.5.1 - Water Supply

12.5.1.1 - Adequate supplies of water drawn from a known clean source shall be provided for use during holding, storage and cleaning of the premises and equipment.

Response: Compliant

12.5.1.2 - Contingency plans shall be in place for instances when the potable water supply is deemed to be contaminated or otherwise inappropriate for use.

Response: Compliant

12.5.1.3 - Supplies of hot and cold water shall be provided as required to enable the effective cleaning of the premises and equipment.

Response: Compliant

12.5.1.4 - The delivery of water within the premises shall ensure potable water is not contaminated. Testing of the backflow system, where possible, shall be conducted at least annually and records shall be maintained.

Response: Compliant

12.5.1.5 - The use of non-potable water shall be controlled such that: i. There is no cross-contamination between potable and non-potable water lines; ii. Non-potable water piping and outlets are clearly identified; and iii. Hoses, taps, and other similar sources of possible contamination are designed to prevent back flow or back siphonage.

Response: Compliant

12.5.1.6 - Where water is stored on-site, storage facilities shall be adequately designed, constructed, and routinely cleaned to prevent contamination.

Response: N/A

Evidence: • Water is not stored on site.

Summary -

Response: Potable water is supplied by the Village of Bartlett Water Supply Authority. The Water Quality Report for 2024 indicated the water to be potable since it was absent for Total Coliforms and E. coli. The Water Quality Report for 2025 is not yet available from the water authority. Utilities observed during the audit were designed, maintained and monitored to control the risk of product contamination. Water is used for cleaning and personal use. Water is not stored on site. Backflow preventers are certified annually by "Mars Irrigation Inc." The most recent service was performed on January 11 of 2026. "Potable Water Contingency Plan" was reviewed on February 18, 2026, and found to be current for providing safe water if the municipality's water

supply is placed on a boil water advisory.

12.5.2 - Water and Ice Quality

12.5.2.1 - Microbiological analysis of the water and ice supply that comes into contact with food or food contact surfaces shall be conducted to verify the cleanliness of the supply, the monitoring activities, and the effectiveness of the treatment measures implemented. Verification, at minimum, shall be made annually.

Response: Compliant

12.5.2.2 - Water and ice shall be analyzed using reference standards and methods.

Response: Compliant

12.5.2.3 - Ice rooms and receptacles shall be constructed of materials as outlined in elements 12.1.2 and designed to minimize contamination of the ice during storage and distribution.

Response: N/A

Evidence: • THE SITE DOES NOT USE ICE IN THE PROCESS.

Summary -

Response: THE SITE DOES NOT USE ICE IN THE PROCESS. Potable water is supplied by the Village of Bartlett Water Supply Authority. The Water Quality Report for 2024 indicated the water to be potable since it was absent for Total Coliforms and E. coli. The water supply authority is in good standing with the Illinois Department of Natural Resources and is responsible for monitoring the water it supplies to the facility according to EPA's Safe Drinking Water Act. Analytical results from a spigot sample submitted to "Certified Laboratories of the Midwest" on February 3, 2026, indicated the bacteriological parameters were in compliance with the Safe Drinking Water Act. Analytical results revealed Total coliform count < 1.1 MPN/100 mL, and Heterotrophic Plate Count < 1 CFU/mL.

12.5.3 - Air and Other Gases

12.5.3.1 - Compressed air or other gases (e.g. nitrogen, carbon dioxide) that contact food or food contact surfaces shall be clean and present no risk to food safety.

Response: Compliant

12.5.3.2 - Compressed air systems and systems used to store or dispense other gases used in food storage and distribution process shall be maintained and regularly monitored for quality and applicable food safety hazards.

Response: Compliant

Summary -

Response: "Compressed Air and Production Room Air Testing" SOP-042, Version: 010, dated January 19, 2026 outlines all testing requirements. Compressed air is monitored with a CAMTU for APC and Yeast & Mold for the compressed air system that is used in the sanitation process. Compressed air used in the manufacturing process does not present risk to food safety as evidenced by compressed air quality annual test for Y&M on February 17, 2026. The facility uses modified atmosphere air for packaging for the fresh products. O₂ levels are monitored as a CQP in production. The facility uses modified atmosphere air for packaging for the fresh products. Certified Laboratories the mid-West provide agar plates to collect samples. Compressed air is run through the device for 20 seconds. Testing is conducted at point of use twice a year from four (4) sites in total,

two (2) in fresh and two (2) in dry. Results are required to be less than 20 CFU/ 20 SEC or less than 10 CFU/ 20 SC for Yeast & Mold. Nitrogen testing was reviewed from February 26, 2026 and certified that the Nitrogen's conformance to the CGA G-10.1 QVL M commodity specification - Assay > 99.999%.

12.6.1 - Receipt, Storage and Handling of Goods

12.6.1.1 - The site shall implement an effective storage plan that allows for the safe, hygienic storage of ice, food products (frozen, chilled, and ambient), packaging, equipment, and chemicals.

Response: Compliant

12.6.1.2 - Dry food products shall be received and stored in a way to prevent cross-contamination with frozen and chilled products.

Response: Compliant

12.6.1.3 - The responsibility and methods for ensuring effective stock rotation principles are applied shall be documented and implemented.

Response: Compliant

12.6.1.4 - Procedures shall be in place to ensure that all food products and recouped products are utilized within their designated shelf life.

Response: Compliant

12.6.1.5 - Where goods are held under temporary or overflow conditions that are not designed for the safe storage of goods, a risk analysis shall be undertaken to ensure there is no risk to the integrity of those goods, or contamination, or adverse effects on food safety.

Response: Compliant

12.6.1.6 - Records shall be available to verify alternate or temporary control measures for storage of raw materials, ingredients, packaging, equipment, chemicals, or finished products.

Response: Compliant

12.6.1.7 - Racks provided for the storage of food products shall be constructed of impervious materials and designed to enable cleaning of the floors and the storage room. Storage areas shall be cleaned at a predetermined frequency.

Response: Compliant

Summary -

Response: The product cooler was adequate and effective to chill and store refrigerated products when observed. Product cooler was properly designed and constructed for inspection and easy cleaning. The product, ingredients or packaging materials were properly rotated in a FIFO manner. The "Receiving of Materials" SOP-004, Version: 05, dated February 10, 2026 requires that all deliveries be inspected for sanitary and food safety conditions. All incoming material inspections are documented on the incoming materials inspection report. The facility has a separate "Transfer of Finished Goods, Raw Materials and Packaging" SOP-51, Version: 04, dated January 27, 2026 pertaining to intercompany transfers from the main production warehouse to the offsite storage warehouse. All company transfers between the production operation and the storage warehouse are inspected according to the policy for sanitation and condition of trailers. All trailers are required to be set at 40°F and all products must be maintained at or under 45°F. All transport of cheese

products must be at or below 45°F. Inventory control is managed through "THEHIVE" to ensure product is used within the required timelines. "THEHIVE" is also able to track rework inventory. QA is responsible for verifying that all incoming ingredient labels match the specifications on file. The Inventory Control department manager is responsible for effective rotation in their area. Proper equipment storage was observed. No other alternate storage was utilized. No expired ingredients or products were observed.

12.6.2 - Cold Storage, Freezing and Chilling of Foods

12.6.2.1 - The site shall provide confirmation of the effective operational performance of freezing, chilling, and cold storage facilities. Chillers, blast freezers, and cold storage rooms shall be designed and constructed to allow for the hygienic and efficient refrigeration of food and shall be easily accessible for inspection and cleaning.

Response: Compliant

12.6.2.2 - Sufficient refrigeration capacity shall be available to store chilled or frozen food at the maximum anticipated throughput of product with allowance for periodic cleaning of refrigerated areas.

Response: Compliant

12.6.2.3 - Discharge from defrost and condensate lines shall be controlled and discharged to the drainage system.

Response: Compliant

12.6.2.4 - The site shall have a written procedure for monitoring temperatures of storage rooms, including the frequency of checks, and corrective actions if the temperature is out of specification. Cold and chilled storage rooms shall be fitted with temperature monitoring equipment, located to monitor the warmest part of the room, and be fitted with a temperature measurement device that is easily readable and accessible. Records shall be kept of frozen, cold, and chilled storage room temperatures.

Response: Compliant

12.6.2.5 - Procedures shall be in place to identify the methods and responsibilities used to ensure that processes applied to materials prior to distribution (e.g. thawing, slacking, labeling) do not pose a risk to product safety or loss of traceability.

Response: Compliant

Summary -

Response: The site's coolers storage areas were constructed of white metalized refrigeration panels. The air handling systems were installed in appropriate areas to allow for sufficient ventilation. The temperatures are continuously monitored via an electronic surveillance system. Alerts are sent when the temperatures are not in specification. Records for temperature checks were maintained and in compliance. The main plant coolers include the raw material and finished product coolers set at 38°F. The production room temperature is set at 45°F. The West Chicago storage warehouse cheese aging cooler is set at 50°F. The storage cooler and refrigerated receiving and shipping docks are set at 38°F. Dry production does not have a target product room temperature. Discharge from condensate lines was into the drainage system. Cheese products are in the cooler for a period of time (6 to 10 days) and released when the bacteriological results indicate the product is safe for distribution. The QA Manager has the authority to release cheese products.

12.6.3 - Storage of Dry Goods

12.6.3.1 - Dry goods shall be located away from wet areas to protect the product from contamination and

deterioration and to prevent packaging from becoming a harborage for pests or vermin.

Response: Compliant

Summary -

Response: The site had appropriate storage away from wet processing.

12.6.4 - Storage of Hazardous Chemicals and Toxic Substances Used On-site

12.6.4.1 - Hazardous chemicals, toxic substances, and pesticides that are for use on the site with the potential for food contamination shall be: i.Used only according to manufacturers' instructions; ii.Controlled to prevent contamination or a food safety hazard to raw material, packaging, work-in-progress, finished product, or product contact surfaces; iii.Included in a current register of all hazardous chemicals and toxic substances that are stored on-site; iv.Supplemented with a current Safety Data Sheet (SDS) made available to all staff; v.Controlled to track usage and ensure return to the appropriate storage areas after use; vi.Be compliant with national and local legislation; and vii.Used so that there is no cross-contamination between chemicals.

Response: Compliant

12.6.4.2 - Hazardous chemicals and toxic substances shall be stored: i.In an area with appropriate signage; ii.Accessible only by personnel trained in the storage and use of chemicals; iii.Separated from the distribution storage area so as not to present a hazard to staff, product, packaging, or product handling equipment; iv.In their original containers, or in clearly labeled secondary containers if allowed by applicable legislation; and v.Stored so that there is no cross-contamination between chemicals.

Response: Compliant

12.6.4.3 - Personnel who handle hazardous chemicals and toxic substances, including pesticides and cleaning chemicals: i.Shall be fully trained in their purpose, storage, handling, and use; ii.Be provided first aid equipment and personnel protective equipment; and iii.Ensure compliance with the proper identification, storage, usage, disposal, and clean-up requirements.

Response: Compliant

12.6.4.4 - The site shall dispose of unused chemicals and empty containers in accordance with regulatory requirements and ensure that: i.Empty chemical containers are not reused; ii.Empty containers are labeled, isolated, and securely stored while awaiting collection; and iii.Unused and obsolete chemicals are stored under secure conditions while waiting authorized disposal by an approved vendor.

Response: Compliant

12.6.4.5 - In the event of a hazardous spill, the site shall: i.Have spillage clean-up instructions to ensure that the spill is properly contained; and ii.Be equipped with spillage kits and cleaning equipment.

Response: Compliant

Summary -

Response: The site segregates their chemicals in a caged area and room that were locked and properly signed. They had appropriate emergency equipment near these areas. The rooms were away from product storage/production and had sufficient ventilation. The site did not store pesticides in the facility. The site's Inventory document identified their approved chemicals which were appropriate for the industry. The chemical provider records the inventory monthly; the auditor reviewed records from January 22 and February 26, 2026. The auditor observed the chemicals to be properly labeled.

12.6.5 - Loading, Transport, and Staging Practices

12.6.5.1 - The practices applied during loading, transport, and unloading of food products and materials shall be documented, implemented, and designed to maintain appropriate storage conditions and product integrity. Practices shall protect against contamination from biological, chemical, and physical hazards, and under conditions that prevent cross-contamination.

Response: Compliant

12.6.5.2 - Sites shall have a procedure in place that is documented and implemented to ensure trailers are inspected prior to receiving shipments or loading to ensure that the trailer is in good repair, clean, secured and at the required environmental condition and temperature.

Response: Compliant

12.6.5.3 - Vehicles (e.g. trucks/vans/containers) used for transporting food shall be inspected prior to loading to ensure they are clean, in good repair, suitable for the purpose, and free from odors or other conditions that may impact negatively on the product.

Response: Compliant

12.6.5.4 - Receiving, staging, loading, and unloading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining product integrity.

Response: Compliant

12.6.5.5 - Where applicable, food transport vehicles' refrigeration units shall maintain the food at the required temperatures and the units' temperature settings shall be set, checked, and recorded before loading and product temperatures monitored at regular intervals during loading as appropriate. The refrigeration units shall be operational at all times and checks shall be completed of the units' operation, the door seals, and the storage temperature at regular intervals during transit.

Response: Compliant

12.6.5.6 - Upon arrival and prior to opening the doors, the food transport vehicles' refrigeration unit storage temperature settings and operating temperature shall be checked and recorded. Receiving shall be completed efficiently and product temperatures shall be recorded at the commencement of unloading and at regular intervals during unloading.

Response: Compliant

Summary -

Response: Employees are required to follow the written instructions in "Loading, Transport and Unloading Practices" SOP-004, Version: 05, dated Feb., 10, 2026 – SOP-014, Version: 06 dated Feb. 10, 2026 and SOP-051, Version: 04 dated Jan. 27, 2026 for consistent and acceptable shipping practices. These SOPs includes policies and procedures for loading, transport, and unloading. Outbound shipments of packaged cheese products are shipped in cold storage trailers that are pre-cooled to the appropriate temperatures. All outbound trucks are inspected for cleanliness. Sanitary conditions of the trailers are recorded on the "SOP 014F1 Finished Goods Shipment Form" worksheets. Likewise, all incoming loads are monitored for suitability before unloading begins. Records are maintained on the "SOP 004F1 Incoming Materials Inspection Report" worksheets. The "Load out report" for outgoing trailer inspection on March 3, 4 & 5; June 4, 5 & 6, September 15, 16 & 17 of 2025 and January 26, 27 & 28 of 2026 were reviewed and indicated with the trailer #, trailer cleanliness (pest, odor), beg time of loading, end time loading, temp @ start, temp @ end, and seal #. Products were loaded

under refrigeration and in a timely and efficient manner to maintain product integrity and minimize temperature abuse. Trailers were secured with seals and seal # were documented on the "Load out report" and the BOL. Trailers were pre-cooled prior to loading products and trailer temperature was monitored and maintained. The refrigeration unit, the unit's operation, the door seals and trailer temperature during transit were monitored by the driver and temperature records were maintained as evidenced by the review of the "Transport Temperature log" monitored via "TempTel" recorders.

12.7.1 - Process Flow

12.7.1.1 - The process flow shall be designed to prevent cross-contamination and organized so there is a continuous flow of product through the process. The flow of personnel shall be managed such that the potential for contamination is minimized.

Response: Compliant

Summary -

Response: There is separation between the aging cheese areas and the finished product cheese areas. Shipping does not flow through the aging areas of the warehouse. Staff access points was observed properly located, designed, and staff donned proper uniform and have captive footwear.

12.7.2 - Control of Foreign Matter Contamination

12.7.2.1 - The responsibility and methods used to prevent foreign matter contamination of the product shall be documented, implemented, and communicated to all staff.

Response: Compliant

12.7.2.2 - Inspections shall be performed to ensure plant and equipment remains in good condition and potential contaminants have not been detached or become damaged or deteriorated.

Response: Compliant

12.7.2.3 - Containers, equipment, and other utensils made of glass, porcelain, ceramics, laboratory glassware, or other like material (except where product is contained in packaging made from these materials, or measurement instruments with glass dial covers, or MIG thermometers required under regulation) shall not be permitted in food processing/contact zones.

Response: Compliant

12.7.2.4 - Where glass objects or similar material are required to be used by the site in storage and handling areas, they shall be listed in a glass inventory including details of their location.

Response: Compliant

12.7.2.5 - Product that is in glass or similar material that is for distribution purposes shall be stored and handled in a manner that prevents contamination.

Response: Compliant

12.7.2.6 - Regular inspections of storage and handling zones shall be conducted (refer to 2.5.4.3) to ensure they are free of glass or other like material and to establish changes to the condition of the objects listed in the glass inventory.

Response: Compliant

12.7.2.7 - Glass instrument dial covers on equipment and MIG thermometers shall be inspected at regular intervals.

Response: N/A

Evidence: • The site does not have glass dial covers or MIG thermometers in the storages areas.

12.7.2.8 - Pallets used in food storage shall be made of a suitable material, dedicated for that purpose, clean, maintained in good order, and their condition subject to regular inspection.

Response: Compliant

12.7.2.9 - Wooden pallets and other wooden utensils used in food handling areas shall be dedicated for that purpose, clean, and maintained in good order. Their condition shall be subject to regular inspection.

Response: Compliant

12.7.2.10 - Loose metal objects on equipment, equipment covers, and overhead structures shall be removed or tightly affixed so as not to present a hazard.

Response: Compliant

Summary -

Response: The company has several procedures in place to prevent/control contamination from metal, plastic, packaging materials and other physical contaminants. "Control of Foreign Matter Contamination" was recently reviewed to ensure suitable measures are in place. The procedure - SOP-07; SOP-09; SOP-18; SOP-24 and SOP-58 - details the who, where, when, action, reference and record of ensuring the final product is free of extraneous material. "Pre-Operational Inspection" in Red-Zone also restricts the introduction of foreign material in the processing/packaging room. The metal control policy, "Metal Detector Policy" prohibits the use or presence of snap off blade knives and control authorized knife use by sign-in and sign-out program. Packaging materials contain no staples or other potential contaminants. Glass, brittle plastic and similar materials are not allowed in production and storage areas according to "Glass and Brittle Plastic Policy." Records were reviewed for several months and found acceptable. There is a REGISTER and MAP maintained and updated on February 21, 2026 of glass and brittle plastic items in the plant which is verified during monthly internal audits. All lights are shielded or shatterproof in the processing room. There is also a "Knife Control Policy" in place to ensure proper usage of cutting items. Pallets in use were observed to be in reasonably clean and good condition. Wooden pallets are also used in the warehouse and distribution areas. Visual inspections are conducted weekly on all wooden pallets. The site does not have glass dial covers or MIG thermometers in the processing areas.

12.7.3 - Managing Foreign Matter Contamination Incidents

12.7.3.1 - In all cases of foreign matter contamination the affected food product shall be isolated, inspected, reworked, or disposed of.

Response: Compliant

12.7.3.2 - In circumstances where glass or similar material breakage occurs, the affected area shall be isolated, cleaned, and thoroughly inspected (including cleaning equipment and footwear) and cleared by a suitably responsible person.

Response: Compliant

Summary -

Response: The hold policy and foreign material control policy outline the control of contaminants. The site does not have glass dial covers or MIG thermometers in the processing/storage areas. In case of glass breakage, the area is isolated, cleaned, inspected and released to production. Any product in the area or ingredients are placed on hold.

12.8.1 - Waste Disposal

12.8.1.1 - The responsibility and methods used to collect and handle dry, wet, and liquid waste and store it prior to removal from the premises shall be documented and implemented.

Response: Compliant

12.8.1.2 - Waste shall be removed on a regular basis and not allowed to build up in food handling or storage areas. Designated waste accumulation areas shall be maintained in a clean and tidy condition until external waste collection is undertaken.

Response: Compliant

12.8.1.3 - Trolleys, vehicles, waste disposal equipment, collection bins, and storage areas shall be maintained in a serviceable condition and cleaned and sanitized regularly so as not to attract pests and other vermin.

Response: Compliant

12.8.1.4 - Where applicable, a documented procedure shall be in place for the controlled disposal of trademarked materials. Where a contracted disposal service is used, the disposal process shall be reviewed regularly to confirm compliance.

Response: Compliant

12.8.1.5 - Inedible waste designated for animal feed shall be stored and handled so that it will not cause a risk to the animal or further processing. If denaturant is used to identify inedible waste, it shall be demonstrated that it does not pose a risk to animal health.

Response: Compliant

12.8.1.6 - Reviews of the effectiveness of waste management will form part of regular hygiene inspections and the results of these inspections shall be included in the relevant hygiene reports (refer to 2.5.4.3).

Response: Compliant

12.8.1.7 - A procedure shall be in place to ensure drainage wastewater is effectively removed from the storage areas (refer to 12.1.2.2). If stored and/or treated on the premises, it shall be stored in a separate storage facility and suitably contained. Inspections of the drainage system and wastewater storage shall be included in the regular site inspections (refer to 2.5.4.3).

Response: Compliant

Summary -

Response: The "Waste Disposal" SOP-028, Version: 4 dated January 20, 2026 documented the methods and responsibility to maintain and eliminate any accumulation of solid or liquid waste. The Maintenance Manager and the Waste Services are responsible for this program. Waste collection, trash bins and compactor storage observed were clean and in serviceable condition at the time of the audit. Solid waste held on site is collected in a closed trash compactor and removed from the premises weekly or as needed. Non-edible cheese removal is contracted to an outside company. Non-edible cheese is shipped to animal feed. There is no evidence of

hazards present as a result of liquid waste removal. Warehouse Waste removal is completed daily from the facility and dumpster pick up is currently scheduled weekly. The facility bales cardboard for removal.
