SQF Food Safety Audit Edition 9

Dairy State Cheese, LLC - 7687

Summary

Audit Decision
Certified

Decision Date
March 23, 2026

Recertification Date
January 29, 2027

Expiration Date
April 14, 2027

Issue Date
March 23, 2026

Certificate Number
US10878-1

Audit Type
Recertification

On-Site Audit Dates
February 26, 2026 - February 27, 2026

ICT Dates
-

Audit Rating

Excellent

Facility and Scope

Dairy State Cheese, LLC - 7687

Box 215 HWY 34/CTY C
Rudolph, WI 54475 United States

Products
Hard Italian Cheese and Whey Protein Concentrate -80, sweet cream

Food Sector Categories
10. Dairy Food Processing

Scope of Certification
10. Dairy Manufacturing for Hard Cheese, Whey and Sweet Cream in vacuumed seal bags or 20K paper bags.

Certification Body and Audit Team

FoodChain ID Certification L.C.

504 North 4th Street
Suite 208
Fairfield, IA 52556-2485 United States

CB#: 42259
Accreditation Body: ANAB
Accreditation Number: 969

Lead Auditor: Nicole Williams (C-413303)
Technical Reviewer: Jane Pappin (C-359154)

Hours Spent on Site: 16.5
Hours of ICT Activities:

Hours Spent Writing Report: 8

Section Responses

Audit Statement - Audit

SQF Practitioner Name - Name the designated SQF Practitioner

Response: Avneet Sonna

SQF Practitioner Email - Email of the designated SQF Practitioner

Response: ASonna@DAIRYSTATECHEESE.COM

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

Response: Avneet Sonna:Director QA & Compliance, Ashlyn Jungwirth:QA Supervisor, Jason Obgartel:Maintenance Manager, Rob Klein:Plant Manager, Luke Arnold:Operations Engineer, Joshua Metz:Production Manager, Nicole Williams: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: This announced SQF certification audit was conducted at the Dairy State Cheese, Rudolph, WI location which is the only location in scope of this certification audit and they manufacture Hard Italian Cheese (currently Parmesan Cheese only) and Whey Protein Concentrate-80 and Sweet Cream. The facility is approximately 90,000 square feet and includes shipping and receiving, warehouse, production, employee facilities and office areas. There are approximately 116 employees covering 2-12 hour shifts Mon-Sun 24/7. The facility is registered with both the USDA and FDA.

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

Response: Avneet Sonna:Director QA & Compliance, Ashlyn Jungwirth:QA Supervisor, Jason Obgartel:Maintenance Manager, Rob Klein:Plant Manager, Luke Arnold:Operations Engineer, Joshua Metz:Production Manager, John Zirbel:COO-External Manufacturing, Nicole Williams:SQF Auditor

Auditor Recommendation - Auditor Recommendation

Response: The auditor recommends certification upon completion of corrective actions for the non-conforming items.

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: The QA-02-002 Food Safety Policy Statement (Rev 5, 01/01/26) is signed by the Dairy State Cheese Plant Manager (RK), the policy is in English and Spanish and posted in the breakroom, visitor entrance, milk intake, control rooms and communicated during new hire and annual employee training. Evidence of the site's food safety culture was noted in the QA-02-002 Food Safety Policy Statement (Rev 5, 01/01/26), QA-02-003 Management Responsibility (Rev 10, 2026-01-01) and other procedures including the site's job descriptions as

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well as an annual Food Safety Culture Assessment/Questionnaire last conducted 01/16/26 and reviewed by Management. The site is focused on leveraging training of all employees to ensure commitment to fostering a proactive quality and food safety culture. Evidence of the site's food safety culture was also noted while interviewing both hourly and salaried employees. QA-02-004 Job Descriptions (Rev 1, 01/01/26) was available for review and the document listed the roles and responsibilities for the President, Chief Operating Officer (COO), Plant Manager, Production Manager, Director of Quality Assurance & Compliance, QA Supervisor, Production Supervisors, Operators, Maintenance Manager, Operations Engineer, Warehouse Manager, Purchasing Coordinator, Lab Supervisor, QA Technician, Sanitarian, Haulers/Intake Operators. Director of Quality Assurance & Compliance (AS) is the SQF Practitioner, the Plant Manager (RK) and QA Supervisor (AJ) are the SQF Practitioner back-ups as documented in Organizational Chart (2026) and QA-02-004 Job Descriptions (Rev 1, 01/01/26). The Director of Quality Assurance & Compliance reports to the President (SB) working directly with the Plant Manager (RK) who reports to the Chief Operating Officer (JZ). The Director of Quality Assurance & Compliance/SQF Practitioner (AS) and Plant Manager (RK) and QA Supervisor (AJ) SQF Practitioner Back-ups are employed by the company. SQF (Food Safety and Quality), HACCP and PCQI training records are on file for both employees. The site maintains an effective training program ensuring that all personnel (employees, contractors, visitors) entering the facility are properly trained based in their roles and responsibilities. Senior site management has processes in place to demonstrate continuous improvement, ensuring the integrity of the food safety systems when there are organizational or personnel changes. The site is aware of the requirement but has no current plans to request an unannounced audit.

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: The Director of Quality Assurance & Compliance is responsible for ensuring that at a minimum the monthly Management meetings cover all annual management review requirements. Meeting minutes are stored in a controlled access Shared folder are used to track meeting minutes. Monthly/Weekly DSC Management Team Meeting and topics covered include topics covering Operations (Cheese Whey), Maintenance, Projects, Finance, QA/QC/Lab, JZ (COO) updates, Retail, General. The site communicated that the SQF Practitioner meets with Senior Management weekly at this time to update management and records were reviewed from 02/19/26, 12/07/25, 11/13/25, 10/09/25, 09/25/25. The Annual meeting held on 01/29/26 included the following topics Purpose, HACCP/Food Safety Plan Review (System Validation, CCP Performance), Food Safety Observations, Consumer Complaints, Product Holds, Maintenance, Equipment & Infrastructure Improvements, Training & Human Resource s Metrics – Overall Training Activity (2025), Internal & External

Audit Performance, Sanitation & Environmental Monitoring, Supplier Performance, Pest Control, Calibration Program, all records were in good order.

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: QA-02-006 Complaint Management (Rev 6, 01/01/26) documents the requirements for all complaints received by Corporate and the site will receive an email communication when complaints are entered. Quality will review all complaints and work with the impacted department, reviewing the complaints and ensuring the customer complaints are addressed. Customer complaints are reviewed during Monthly meetings, with trends documented. The procedures in place ensure that all complaints are effectively addressed in the complaint system, including documenting the basis of the complaint, Investigation, Root Cause, Corrective and Preventive Actions taken. This information is documented directly into the complaint filing system. 2025 the site has received 3 complaints – Misc (Flies on skid inside pallet wrap – 01/19/25), Packaging (Two layers of film on the outside of the 40# blocks – 02/05/25), Body (Sensory) (Raw material very soft, will not shred – 05/19/25) as well as 1 YTD 2026 Foreign Material (Black gasket found inside the cream sample – 01/21/26 – there was no finished product implicated). All complaints are received by the Director of Quality Assurance & Compliance and documented on the Customer Complaint Tracker, records were reviewed (QA-01-003 Root Cause Corrective Action Form – Complaints Rev 1, 02/12/24) regarding the complaints, root cause and corrective actions taken are documented as being addressed per site requirements.

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 site maintains numerous documents including FS-03-001 Milk Products (Rev 1, 01/01/26) includes FS-03-002 Cheese (06/30/25) /FS-03-004 Sweet Cream (by product of Cheese Production) (09/01/25) and FS-03-003 Whey Protein Concentrate and Whey (06/30/25) along with additional policies and procedures referenced throughout this report, communicate the site's overall quality and food safety program processes and procedures, including materials used/produced within the facility and regulations impacting their processes and finished product. Documentation is available in both electronic and hard copy. The QA-02-002 Food Safety Policy Statement (Rev 5, 01/01/26) is signed by the Dairy State Cheese Plant Manager (RK), the policy is in English and Spanish and posted in the breakroom, visitor entrance, milk intake, control rooms and communicated during new hire and annual employee training. The Director of Quality Assurance & Compliance/SQF Practitioner (AS) and Plant Manager (RK) and QA Supervisor (AJ) SQF Practitioner Back-ups roles and responsibilities are documented on the Organizational Chart (2026) and QA-02-004 Job Descriptions (Rev 1, 01/01/26). The Director of Quality Assurance & Compliance reports to the President (SB) working directly with the Plant Manager (RK) who reports to the Chief Operating Officer (JZ). The program is reviewed and updated as needed at a minimum annually. The site ensures the program remains current and relevant for the processes and personnel used to produce finished product that meets company, customer and regulatory requirements.

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: QA-02-009 Document Control and Record Retention (Rev 11, 01/01/26) documents the site's document control program. The SQF Practitioner and management are responsible for ensuring that the program is followed. All approved documents are maintained in Sharepoint and the system records the next review date in the system. All records reviewed were current per the documented information reviewed in Sharepoint.

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: QA-02-009 Document Control and Record Retention (Rev 11, 01/01/26) documents the site's requirements for verifying and retaining records which the Quality Department is responsible for managing based on customer, company and regulatory requirements. All records are required to be legible, signed, dated, completed using only ink pens and reviewed/verified by management within 3-7 days following production (prior to product release). Records are maintained for a minimum of 2 years (product shelf life ranges from 72 hours – to 24 month) onsite and then moved to an offsite storage location for another 3 years.

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: The site has several procedures in place for the management of design and development of finished products, processes and materials used by the company. Those procedures include QA-01-010 Product Formulation and Realization (Rev 6, 01/01/26). The procedures communicate that Management is responsible for new and revised product formulations. The site (Plant Manager, Quality and Operations) is responsible for managing all plant trial parameters and ensuring that all new or revised products are meeting all food safety, quality and regulatory requirements. The site will also do COA Validations on ingredient raw materials per each lot/purchase order received into the facility – part of the raw materials release procedure. The site has two FS-03-001 Milk Products (Rev 1, 01/01/26) includes FS-03-002 Cheese (06/30/25) /FS-03-004 Sweet Cream (by product of Cheese Production) (09/01/25) and FS-03-003 Whey Protein Concentrate and Whey (06/30/25), which are reviewed by the HACCP team, shared with management at a minimum annually and updated as needed. All materials (ingredients, packaging material), processes, equipment and finished products produced by the site are covered under the documented HACCP plan which follows Codex guidelines. Both electronic and manual product records, product specifications for raw materials, finished product and processes are maintained and accessible by the site.

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: Product specifications are maintained at the corporate level. The site will access specifications via SharePoint controlled access folders. QA-02-025 Finished Product Specifications (Rev 5, 01/01/26), QA-02-024 Label approval Program (Rev 5, 01/01/26), QA-02-011 Shelf Life Program (Rev 6, 01/01/26) document the procedures followed by the site to ensure all raw materials, packaging and finished product specifications used in the production process are compliant with company, customer and legislative requirements. Specifications for all raw materials used in the process are maintained and accessible by production staff. All materials received into the facility follow the same documented process. All materials are inspected upon receipt and documented per site requirements. The supplier management program requires that suppliers notify the site when ingredients are changed. Ingredients are also reviewed against the specification to ensure they are meeting site requirements. All materials received into the facility follow the same documented process and the site maintains letters of guarantee, certificate of analysis and/or certificates of compliance for all ingredients, processing aids and packaging that coming in direct contact with finished product. Finished packaging labels are reviewed and verified per site and customer requirements for traceability. Approved labels are available for the site to review in a controlled access electronic folder. QA-02-035 Contract Service Provider Control (Rev 8, 01/01/26) documents the program followed by the site to manage contract service providers. A list of the contracted service providers that have an impact on product safety is documented on the REG-005 Approved Supplier Contact Information includes Uniforms/Laundry Services, Pest Control, Chemicals, Calibration, External Labs and Waste Management. Finished product specifications are current, documented and approved by corporate and the customer. Specifications list all requirements to be followed to ensure the finished product is meeting company, customer and regulatory requirements. The site maintains a register of all current raw, packaging and finished product specifications are maintained. Review of records during the audit indicated records are current and effectively maintained. Random specifications were reviewed during the audit and they include raw materials –Raw Milk, Sweet Cream (by product of cheese

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process), Whey Cream (by product of whey processing), Cheese SDS, Whey SDS, Whey Protein Concentrate 80 (WPC 80 and Instantized) and Parmesan-DS, no issues were noted.

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: • At the time of the audit, the site was not using any contract manufacturers.

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: • At the time of the audit, the site was not using any contract manufacturers.

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 relevantpersonnel. 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: • At the time of the audit, the site was not using any contract manufacturers.

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

Response: N/A

Evidence: • At the time of the audit, the site was not using any contract manufacturers.

Summary -

Response: At the time of the audit, the site was not using any contract manufacturers.

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: QA-02-014 Approved Supplier Program (Rev 5, 01/01/26) documents the procedure followed by the site to manage all raw material suppliers (ingredients, packaging and processing aids). The procedure documents the requirements for approving suppliers of ingredients, processing aids and packaging materials. The requirements include a review of the specifications of products, the supplier's food safety controls, procedures for granting and monitoring approved suppliers, the level of risk, requirements for Letter of Guarantee, Certificate of Conformance/Analysis. A register is maintained by corporate of all current approved suppliers being utilized by the site and is documented in REG-005 Approved Supplier Contact Information. The requirements for emergency (spot buys) use of non-approved suppliers are also documented in QA-02-014 Approved Supplier Program (Rev 5, 01/01/26) and the site has not had to make any emergency purchases since their last audit. QA-02-014 Approved Supplier Program (Rev 5, 01/01/26) and Approved Supplier Score Card documents the procedures followed by the site to manage and monitor the performance of approved suppliers with the status of suppliers documented in the Approved Supplier Score Card. Suppliers are required to be reviewed at a minimum annually. The site will document vendor nonconformances per the QA-02-014 Approved Supplier Program (Rev 5, 01/01/26) and at the time of the audit the site did not have any vendor issues requiring additional follow-up or corrective actions. The site has documented procedures in place to secure incoming products from sabotage substitution, mislabeling and dilution. They include raw material specifications as well as Certificate of Conformance/Analysis and/or letter of guarantee from suppliers. Based on documented requirements, all raw materials are required to meet specifications and provide a Certificate of Conformance/Analysis, letter of guarantee and/or lot traceability which is reviewed and verified when materials are received. All services are to be conducted in a manner that does not put product, processes, equipment or facilities at risk and/or create a food safety risk including any materials purchased in an

emergency. All materials and ingredients come from approved suppliers and based on the Food Fraud and HACCP programs, supplier Food Vulnerability Assessments are based on risk and the assessments are on file with corporate for approved suppliers of ingredients/components.

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: QA-02-026 Food Legislation (Rev 7, 01/01/26) along with other process and product related procedures, documents the requirements followed by the site to ensure that finished product is produced in compliance with all regulatory and legislative requirements. The Senior Management, Quality and Department Managers/Supervisors and All Employees ensure the site remains in compliance with all regulatory and legislative requirements. The site is registered with the FDA/Wisconsin Department of Agriculture Trade and Consumer Protection and USDA and they were not aware of any issues that the USDA or FDA identified that would change their current good standing registration status. With support from corporate, the is kept update regarding changes in relevant legislation, technical developments, emerging issues and relevant industry codes of practice in their specific industry, by means of the several entities that include the FDA website, USDA website, FDA, Wisconsin Department of Agriculture Trade and Consumer Protection, PMO, SQFI website as well as other application federal, state or local laws and regulations. The site has a written provision that the certification body and SQFI will be notified within 24 hours if a food safety event occurs that requires public notification.

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 site has identified, documented and implemented FS-02-002 Good Manufacturing Practices (GMP) Program – Employees, Visitors and Contractors (Rev 6, 01/01/26), FS-02-003 Good Manufacturing Practices – Facility Grounds and Utilities (Rev 5, 01/0/26) and GMP Operational Risk Assessment – Manufacturing, Receiving, Shipping Storage 01/15/26 which are applicable to the scope of the work conducted on site, the SQF standard with no exclusions and documents the site's GMP requirements. All personnel entering the facility are provided with information regarding these requirements. These food safety pre-requisite programs are documented in the HACCP Plans and within the Food Safety Program. The effectiveness of the pre-requisite programs is verified as part of the HACCP and monthly GMP inspections.

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: FS-03-001 Milk Products (Rev 1, 01/01/26) includes FS-03-002 Cheese (06/30/25) /FS-03-004 Sweet Cream (by product of Cheese Production) (09/01/25) and FS-03-003 Whey Protein Concentrate and Whey (06/30/25) reviewed and signed documents the site's overall HACCP program which follows Codex guidelines which includes hard Italian cheese sweet cream (by product of cheese production) and Whey Protein Concentrate and Whey. The HACCP team is led by the Director of Quality Assurance & Compliance with the QA Supervisor serving as the back-up and includes members from Quality, Management, Operations and Maintenance. Training records were reviewed for all members of the HACCP team. The Cheese (Sweet Cream is a by-product and requires further processing by the customer) and Whey process flow diagrams include Ingredient & Packaging Receiving, Storage, Milk Separation, UF Process, Heat Treatment (CCP 1 – Cheese/Whey Pasteurization), (Cheese Vats Cooking or curds/Draining Tables, Curd Towers, Pressing Blocks (in bags)), (UF Process, Permeate, RO, Polisher, Filters, Bagging), Metal Detector, Packaging, Labelling, Palletizing and Storage, documents all the overall scope of production including steps (inputs and outputs) in the site's production process. The HACCP Plans include a list of all products in the scope of the certification, a complete product description and intended product use. The Hazard Analysis Worksheets document the Ingredients and Process Hazard Analysis (reviewed 12/01/25), listing ingredient categories and processing steps along with the potential hazards and control measures. The food safety team has analyzed all hazards reasonably likely to occur including physical, chemical and microbiological hazards for each process step, ingredient and packaging. Control measures are in place to eliminate or reduce the food safety risk to acceptable levels. The program maintains 1 CCP Heat Treatment (Pasteurization) (>161oF for >15 seconds – continuous for every batch) conducted by trained production operators. The site has documented processes that define how to handle nonconforming material that does not meet the critical parameters set by the site. Affected material is segregated until disposition is determined and properly disposal of per site requirements. Verification checks on metal detectors are verified at a minimum every hour during production. Metal detection records are generated and were reviewed during the audit and all records were in good order. The site ships finished product within the United States only, directly to the customers.

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: All product testing requirements are documented for Whey (Excel sheet) and Cheese (SoftTrace) which includes processes followed by the site regarding sampling, inspection and analysis of raw materials, work-in-progress and finished product. The FS-03-001 Milk Products (Rev 1, 01/01/26) includes FS-03-002 Cheese (06/30/25) /FS-03-004 Sweet Cream (by product of Cheese Production) (09/01/25) and FS-03-003 Whey Protein Concentrate and Whey (06/30/25) process flow diagrams include Ingredient & Packaging Receiving, Storage, Milk Separation, UF Process, Heat Treatment (CCP 1 – Cheese/Whey Pasteurization), (Cheese Vats Cooking or curds/Draining Tables, Curd Towers, Pressing Blocks (in bags)), (UF Process, Permeate, RO, Polisher, Filters, Bagging), Metal Detector, Packaging, Labelling, Palletizing and Storage documents all the overall scope of production including steps (inputs and outputs) in the site's production process. Product analysis for product release and monitoring is conducted in-house for (chemical, microbiological, physical and sensory) and via a 3rd party lab (pathogens). Analysis methods used are industry standards and nationally recognized as documented in QA-02-022 Product Sampling, Inspection, and Analysis (Rev 5, 01/01/26) and includes Raw Milk (antibiotics, temperature), Cream, whey cream (composition only), In-process – fat, protein, moisture, salt, Cheese – Composition micro, sensory and WPC-80 – Protein Moisture, Micro Functional parameters. On site laboratory personnel conducting testing are required to participate in annual proficiency testing. Proficiency testing for microbiology quarterly (APC, E.Coli, Enterobacteriace, S.aureus, Total Coliform Yeast & Mold) 02/25/26 and 11/12/25 Cheese analytical quarterly – butterfat, moisture, pH, protein, salt – 02/13/26 – no issues reported. 2165.WI.01.3197 Product Texture Verification (01/31/24) documents the processes to be followed by the site to conduct sensory evaluation regarding the finished product. Sensory evaluation for cheese is conducted by production personnel in the Quality Lab – no evaluations are conducted in the production areas. The Quality lab is located in an area away from production and warehouse, access to

the lab is controlled via personnel and locks. Accredited external labs are utilized for testing finished products and environmental swabs for pathogens and non-pathogens. All microbiological laboratory waste is autoclaved by the site prior to disposal and no issues were observed at the time of the audit. The site does retain finished Whey powder product production samples until the end of shelf life and is maintained in designated areas onsite. Records for product inspections are maintained in the production packet which is reviewed and verified as part of the product release process (records include process control charts (HTST and CIP) and site required production logs per day related to product safety, traceability and quality).

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: QA-02-018 Non-Conforming Product, Hold & Release Program (Rev 6, 01/01/26) documents the site requirements for managing non-conforming products, raw materials, work-in-progress, ingredients, packaging and equipment. Methods employed by the sites to segregate, identify, handle and dispose of product include identification, segregation, return to supplier or disposal, and were observed to minimize any inadvertent use or shipment to customers. Product is placed on hold in SoftTrace which restricts product movement until disposition can be determined by Quality. At the time of the audit the site did have product on hold – Sensory Hold – CHE_003 Parmesan Cheese-DS lot CHE260202-10013/14/15/16 – produced 02/02/26 – final disposition still pending.

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: QA-02-027 Product Rework (Rev 6, 01/01.26) documents the site's rework program which is managed by Quality and Production Personnel requires initial approval by R&D before it can be used in any

recipes - approved rework authorizations are listed in Sharepoint. At the time of the audit the site did not have any product to be used as rework. Rework is identified throughout the process (traceability is maintained) and all batches are inspected and signed off by the designated personnel. All records are maintained with the applicable production records.

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: QA-02-018 Non-Confirming Product, Hold & Release Program (Rev 6, 01/01/26) documents the procedures followed by the site for releasing finished products. The 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 release packets including QP-01-015 Metal Detection Log (Rev 1, 01/09/24) (Cheese), DP-01-011 Dryer Metal Detector Log (Rev New, 10/02/23), Milk HTST Charts, Production Records in Soft Trace and COAs were reviewed for products released 02/20/26, 01/29/26, 12/09/25, 11/10/25 and 10/16/25. which included Parmesan Cheese and WPC 80 (Instantized and Non-instantized) and all were in good order. The checks that are required to release finished product include review of production records (including review of the Milk HTST Charts, Production Records in Soft Trace, quality checks and packaging/label inspections. Pathogen testing is also required for product release (Listeria spp, Salmonella, Staphylococcus aureus-per customer request – in addition to Ecoli, Coliform, Yeast & Mold per specifications). The site does not use off-site or contract warehouses to ship any product to customers.

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: QA-02-039 Environmental Monitoring – Equipment, Drains and Plant environment (Rev 0, 01/01/26) documents that the site has implemented a risk-based environmental monitoring program. The sampling and testing program includes method, species, scheduled sampling frequency and sample zones. Pre-operational inspections are conducted following cleaning as part of the sanitation/pre-op processes (visual and ATP swabs). Finished product swabs taken for every vat (Coliform, E.Coli, Yeast & Mold), 5 vat composite sample (Salmonella, Listeria spp, Staph Aureus) and records from 2025/2026 were reviewed. The pathogen monitoring sampling and testing program includes swabbing, sample zones, testing frequencies and species: Listeria spp and Salmonella once a week – Listeria spp zones 2-4, Salmonella zones 3-4 – swabbing is daily to cover required areas weekly. ATP swabs daily to cover all areas weekly and records from 2025/2026 were reviewed. The procedures require that corrective actions be taken when unsatisfactory results and/or trends are found. Review of site records documented on DSC-Environmental Monitoring New 12/30/25 from daily swabs from random dates throughout 2025 –February 2026 with issues reported and addressed per site requirements were in good order. Trended of results is conducted by the site and at the corporate level to ensure compliance is maintained.

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: QA-02-020 Verification and Validation Program (Rev 6, 01/01.26) along with the Validation of Effectiveness matrix documents document the Program, Method of Validation, Frequency and Responsibility for ensuring the effectiveness of Calibration, Maintenance, Pest Control, Sanitation, Personnel Practices, Personnel Processing Practices, Water and Air Supply, Storage and Transportation, Foreign Material Control, Waste Management, Training and Supplier Approval have been documented and effectively implemented. Methods employed by the site to ensure that procedure and process changes are still effective in controlling food safety are also documented. They include annual reviews of the overall programs/processes/procedures and all critical limits and key parameters/requirements that have been established. Any changes to processes or procedures are validated per site requirements. The site uses internal audits to confirm all elements have been implemented effectively and records of these reviews are documented throughout this audit report.

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: QA-02-020 Verification and Validation Program (Rev 6, 01/01.26) along with the Validation of Effectiveness matrix documents the Program, Method of Validation, Frequency and Responsibility for ensuring the effectiveness of Calibration, Maintenance, Pest Control, Sanitation, Personnel Practices, Personnel Processing Practices, Water and Air Supply, Storage and Transportation, Foreign Material Control, Waste Management, Training and Supplier Approval have been documented and effectively implemented. They include annually, quarterly, weekly, monthly, daily verification checks of processes and records to ensure that all requirements are being met and maintained. Records of verification of monitoring activities including test of the food defense, product release, mock recall, supplier approval, crisis management test, calibration, environmental program monitoring, GMP monitoring, glass and brittle plastic inspections, internal audits, pest control services and sanitation/cleaning were reviewed during the audit.

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: QA-02-021 Corrective and Preventive Action (CAPA) Program (Rev 6, 01/01/26) documents the site's requirements for the management of corrective and preventive actions. The procedure requires the identification of root causes, implementation of corrections, corrective actions and verification/validation. The site is addressing issues/nonconformances found within their program, with evidence that they are following their procedures for documenting corrections/corrective actions and preventive actions when nonconformances are found regarding monitoring or verification activities identified out of compliance, issues or trends from customer complaints, critical limits are exceeded and/or internal audit findings against the

standard. The CAPA Log is maintained in Sharepoint and is used to document issues noted during the monthly Self/GMP inspections, SQF internal audit findings and corrective actions are documented in the log. Management will determine when a more detailed CAPA is required which includes Internal audit non-conformance, Foreign matter contamination or risk, Repeat GMP or sanitation deviations, Customer complaint involving food safety or occurring quality issues Regulatory or certification body finding, Failure or a preventive control or CCP deviation – which are documented on designated forms. Customer complaints and corrective actions taken are documented in and Excel spreadsheet maintained in Sharepoint.

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: Minor

Evidence: • Review of internal audit report documented to assess the effectiveness of the SQF system (Food Safety) completed on 01/19/26, the site was not able to show evidence of compliance being documented throughout the audit report – Module 11.

Root Cause: The internal audit checklist format previously used did not explicitly require documentation of objective evidence demonstrating how compliance with each SQF clause was verified. As a result, the audit report documented compliance conclusions without consistently recording the supporting evidence. Additionally, the internal audit process relied on a single auditor and did not include an independent verification step to confirm completeness of documentation.

Corrective Action: The internal audit report for Module 11 conducted on 01/19/2026 was reviewed and updated to include documented objective evidence demonstrating how compliance was verified for each applicable clause. Evidence now includes records reviewed, observations made during facility inspection, and employee interviews where applicable. The internal audit checklist and procedure QA-02-030 Internal Audits and Inspections were revised to require documentation of objective evidence for each audited clause and to clearly identify the method of verification (observation, record review, or interview). The checklist now also requires identification of compliance status (Compliant, Non-conformance, or Observation) and includes fields for auditor comments. To strengthen the internal audit program, a two-person verification process has been implemented. One qualified auditor conducts the audit and documents the evidence, while a second QA representative reviews and verifies the completeness and accuracy of the audit documentation prior to closure. In addition, the internal audit program was updated to a risk-based annual audit schedule ensuring that all SQF system elements are audited within the calendar year, while higher-risk programs such as GMPs, sanitation, CCP monitoring, and environmental monitoring are audited more frequently.

Verification Of Closeout: The corrective, root cause analysis and corrective action plan has been reviewed and accepted. The site has updated the current internal audit report to ensure the report has been completed per requirements and will follow this process going forward as well as ensure a verification step is complete with future internal audit reports..

Completion Date: March 19, 2026 **Closeout Date:** March 20, 2026

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: QA-02-030 Internal Audits and Inspections (Rev 6, 01/01/26) documents the processes followed by the site for scheduling and conducting internal audits to assess the effectiveness of the SQF system (Food Safety). Audit reports for Food Safety System was completed on 01/19/26. The site was not able to show evidence of compliance being documented throughout the audit report. The Dairy State Cheese personnel that conducted the SQF system audit (Food Safety) was the Director of Quality Assurance & Compliance (AS) – internal auditor training records on file. Additionally, the site has a requirement to conduct monthly Self/GMP Inspections as documented in a template that is recorded the Excel spreadsheet QA-01-020 Facility GMP Audit which includes inspections regarding Hygiene Room, Table Area,, Vat Make CIP Area, Vat Make Area, Milk Separator Area, Silo Ally (Milk & Cream), Milk HTST Area, Milk CIP Room, Cheese Belt & Fine Saver Area, Cheese Tower Area, Massman & Vacuum Pump Area, Dry Warehouse, Big & Small Cooler Area, Dryer Packaging Area, Tower CIP Area, Dryer Bagging Area, Dryer Area, Ammonia Room, Bulk CIP Chemical Room, Boiler Room, UF/RO/Separator/Clarifier & CIP Skid Area, Whey Silo Alley, New Whey CIP System Area, Whey Loadout, Milk Intake & CIP System, New Cream Silo Alley, Building Exterior, Retail Cut and Wrap Area, Lab. The inspections are documented in the Excel spreadsheet QA-01-020 Facility GMP Audit 02/17/26, 01/26/26, 12/30/25, 11/03/25 with issues identified and address per site requirement, all records were found to be in good order. The Dairy State Cheese personnel that conducted audits as documented on the QA-01-020 Facility GMP Audit are led by the QA Supervisor (AJ) and internal auditor training records on file. Minor 2.5.4.1 – Review of internal audit report documented to assess the effectiveness of the SQF system (Food Safety) completed on 01/19/26, the site was not able to show evidence of compliance being documented throughout the audit report – Module 11.

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: QA-02-015 Product Withdrawal and Recall (Rev 9, 08/18/25) documents the procedures followed by the site to ensure products are identified and traceability maintained from receipt through production and shipping. The site's identification system ensures all raw materials, ingredients, packaging materials, work-in-progress and finished goods are clearly identified at all stages of their process. Items are traced by the lot numbers provided by the specific suppliers. Product identification records were reviewed during the audit for ingredients, packaging and finished product being used during production at the time of the audit. Mock recall/trace exercises conducted by the site was reviewed – trace was conducted on 01/29/26 Parmesan Cheese – Material Che_0032, Che_0035/Lot CHE251225-10001-20/Produced 12/25/25; Packaging – Clear Bag – Material CNS-101.35K 18.25X25 ID/Lot 485398/Received 10/28/25; Ingredient – Raw Milk received 12/24-27/26 as well as records for Rennet and Cultures and no issues were reported with any of the recall/trace exercises. Several procedures are in place regarding sampling, inspection and analysis of raw materials, work-in-progress and finished product that include QA-02-022 Product Sampling, Inspection, and Analysis (Rev 5, 01/01/26). The documented procedures provide information on what processes are followed to ensure the finished product is packaged and labelled correctly. Changeovers are conducted and records are maintained in production paperwork as documented in QA-02-038 Product Start-up and Changeover (Rev 1, 01/01/26), no changeovers were observed during the audit.

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: QA-02-015 Product Withdrawal and Recall (Rev 9, 08/18/25) documents the site's requirement for conducting mock recall of their system to ensure product traceability. The effectiveness of the trace system is conducted at least 2 times annually with a minimal product recovery requirement of > 99% to < 102% in 2 hours or less. Mock recall/trace exercises conducted by the site was reviewed – trace was conducted on 01/29/26 Parmesan Cheese – Material Che_0032, Che_0035/Lot CHE251225-10001-20/Produced 12/25/25; Packaging – Clear Bag – Material CNS-101.35K 18.25X25 ID/Lot 485398/Received 10/28/25; Ingredient – Raw Milk received 12/24-27/26 as well as records for Rennet and Cultures and no issues were reported with any of the recall/trace exercises. Records of the receipt, use and dispatch of raw materials, finished product and production records are maintained and observed to be identified to ensure traceability is effectively maintained.

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: QA-02-015 Product Withdrawal and Recall (Rev 9, 08/18/25) and QA-02-007 Crisis Management (Rev 7, 01/01/26) documents the site's methods and responsibilities followed for when a product recall is necessary. Top management at both the corporate and site level along with the SQF Practitioner determines if there will be a recall or voluntary withdrawal. The recall policy includes the requirement to investigate a recall and determine the root cause of a recall/withdrawal with a corrective action. It also includes a communication plan to notify customers, consumers, regulatory authorities and other essential bodies. QA-02-015 Product Withdrawal and Recall (Rev 9, 08/18/25) documents the site's requirement for conducting mock recall of their system to ensure product traceability. The effectiveness of the trace system is conducted at least 1 time annually with a minimal product recovery requirement of 100% in 4 hours. Mock recall/trace exercises conducted by the site was reviewed – trace was conducted on 01/29/26 Parmesan Cheese – Material Che_0032, Che_0035/Lot CHE251225-10001-20/Produced 12/25/25; Packaging – Clear Bag – Material CNS-101.35K 18.25X25 ID/Lot 485398/Received 10/28/25; Ingredient – Raw Milk received 12/24-27/26 as well as records for Rennet and Cultures and no issues were reported with any of the recall/trace exercises. Records of the receipt, use and dispatch of raw materials, finished product and production records are maintained and observed to be identified to ensure traceability for the mock recalls. The site has a written provision that the certification body and SQFI will be notified within 24 hours if a food safety event occurs that requires public notification.

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: QA-02-007 Crisis Management (Rev 7, 01/01/26) documents the site's procedures for crisis management. The Plan has been effectively implemented by Senior Management and addresses serious disaster threats that could cause an extended interruption of the business and/or impact product. The Plan includes how the site will respond to a business interruption, isolating and identifying affected products, a current crisis alert list, an internal/external communication protocol including legal and expert advice. Annual QA-02-007 Crisis Scenario/Mock Drill (03/25/25) scenario report documented the most recent crisis drill exercise "CFR Tower Removal & Networking Failure During Relco Tower Installation" – with no issues reported.

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: FS-02-004 Food Defense Plan (Rev 9, 01/01/26) and Food Defense Plan (09/25/25) document the site's procedures, personnel responsibilities and criteria for preventing deliberate food adulteration and/or acts of sabotage have been documented. The food defense plan includes the names of senior managers responsible for food defense, designated access points, the secured storage of materials, hazardous chemicals and the controlled access in and out of the facility for employees, contractors and visitors. The Annual Food Defense Challenge/Mock Scenario conducted on 01/25/26 focused on unauthorized individual trying to gain access to the intake laboratory and SoftTrace Computer system – no issues were reported.

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: FS-02-005 Food Fraud Program (Rev 4, 01/01/26) and Information and scoping sheet (Food Fraud Vulnerability Assessment) 12/12/25 document the site’s susceptibility to fraudulent economic gain, including product substitution, mislabeling, counterfeiting and dilution that could impact food safety. DFA Corporate has also completed a food fraud risk assessment for all ingredients and the site is able to access that report and review those ingredients applicable to their facility via Sharepoint. The food fraud plan is reviewed at a minimum annually and includes the name of the senior managers responsible for managing potential food fraud risk.

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: QA-02-017 Allergen Management (Rev 5, 01/01/26) documents the site's allergen management program that they utilize to control allergens and prevent contamination of packaging. The site maintains a list of allergens used in their processes. Milk/Dairy is the only allergen used in the processing facilities and the allergen is found in all products produced by the site. The site only ships finished product within the United States directly to the customer. Processes are in place for staff to follow regarding the risk of cross contamination via awareness training and hand washing. A risk analysis (part of the Ingredient HACCP Hazard Analysis) was observed to be in place for allergens including raw materials, ingredients and processing aids and food grade lubricants, oil or grease used and food items (vending and brought in by personnel). There is a product identification system in place 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 food contact surfaces were found to be in place. The product trace system ensures the complete trace of any rework. Labelled finished packaging is reviewed and verified as part of the production/product release process with records generated and maintained. Label verification procedure includes the process to control the accuracy of finished product labels. Product changeovers use validated cleaning and scheduling to eliminate the risk of cross contamination. The site also handles rework in such a manner as to minimize any risk of cross contamination that includes product labeling and storage per site requirements. Allergenic products (Milk) in storage were observed during the audit to be properly labeled and stored per site requirements.

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: Minor

Evidence: • During an interview with an operator responsible for monitoring the cheese metal detector it was

noted they were not effectively trained regarding the requirements documented in QA-02-037 Metal Detection Program (Rev 1, 01/01/26), the operator communicated that if the metal detector alarmed/kicked off product, they would send it back through the metal detector once and if it did not alarm the product was good. Per the documented procedure the product should be sent back 3 times and if no alarm then the product is good.

Root Cause: The investigation determined that the deviation occurred because the previous metal detection monitoring form and operational instructions were not fully available in Spanish, which created a potential language comprehension gap for some operators responsible for monitoring the metal detector. In addition, the previous monitoring form did not include clear task instructions or a quick-reference guide for deviation handling at the point of use. As a result, the operator relied on memory rather than following a clearly visible step-by-step instruction when responding to a metal detector reject event.

Corrective Action: The Metal Detection Program (QA-02-037) and associated monitoring documentation were reviewed and updated to improve clarity and operator understanding. The metal detection log sheet (OP-01-015) was revised to include a bilingual English and Spanish format and now provides clear task instructions and deviation procedures on the reverse side of the form to guide operators during monitoring and reject events. The updated form explicitly instructs operators that rejected product must be passed through the metal detector three (3) consecutive times before it can be considered acceptable. Additionally, a visual Metal Detector Workflow decision guide was developed and implemented to provide operators with a step-by-step process for handling metal detector verification failures and rejected product. This workflow supports consistent decision-making and reinforces the correct procedure during operations. All affected employees were retrained on the updated Metal Detection Program and revised monitoring procedures. Training was delivered through the Rootwurks training platform with a supporting instructional video and knowledge check to verify competency. In limited cases where scheduling constraints existed, training was completed using documented paper records. Training records, the training video, and the knowledge check are maintained within the training system as supporting documentation for this corrective action.

Verification Of Closeout: The corrective, root cause analysis and corrective action plan has been reviewed and accepted. The site has updated the metal detection documentation to include English and Spanish as needed as well as ensure all requirements are documented and personnel are trained regarding the requirements.

Completion Date: March 19, 2026 **Closeout Date:** March 20, 2026

Summary -

Response: QA-02-036 Training Program (Rev 6, 01/01/26) documents the roles and responsibilities for the establishment, implementation and management of the training needs for the site's personnel. Training appropriate to the roles and responsibilities of all site personnel are conducted to ensure they are competent regarding their responsibilities ensuring the tasks they conduct are in compliance with the SQF Food standards as well as company and customer requirements. Interviews with employees and review of training records during the audit (hourly and salaried including management) provided evidence of the implementation and ongoing management of the site's training requirements. Minor 2.9.1.2 – During an interview with an operator responsible for monitoring the cheese metal detector it was noted they were not effectively trained regarding the requirements documented in QA-02-037 Metal Detection Program (Rev 1, 01/01/26), the operator communicated that if the metal detector alarmed/kicked off product, they would send it back through the metal detector once and if it did not alarm the product was good. Per the documented procedure the product should be sent back 3 times and if no alarm then the product is good.

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: QA-02-036 Training Program (Rev 6, 01/01/26) documents the roles and responsibilities for the establishment, implementation and management of the training needs for the site's personnel. The training program requires that all personnel are trained based on their role and topics that include Lab SOPs, Maintenance SOPs, Positive Milk Load Procedure, Inspection & Sampling Procedure for receiving raw milk, 40# Block Seal Leak Check, Employee Onboarding/GMP/Food Safety/Chemical Safety, Positive Load, Disabled Pumo Milk Load Confirmation Procedure, Powered Pallet Jack Training, CCP/Pasteurization/Chart Requirements, Proper pH Management and Salting Application, Proper Sealing, New Hire Onboarding/GMP/Food Safety, Metal Detection, Silo Wash Tracking, ChemStation-Basic Chemical Training , Daily Scale Check – Finished Product. The training program is administered by the Quality Department and/or other management designees and conducted in the RootWurks system and/or via classroom. Training is conducted in English and Spanish to ensure employees understand site requirements. Training records were reviewed for employees (salaried and hourly) interviewed during the audit which included new hires, temporary and annual refresher training, and they were in good order.

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 facility has a current business license to operate issued by the Wisconsin Department of Agriculture, Trade and Consumer Protection Dairy Plant License #518037 expiration date 04/30/26 for plant number 55-1886, Milk Contractor License expiration 04/30/26, Drug Residue Screening Lab 12/31/26, Vehicle Scale Operator License 03/31/26, FDA site XXXXXXX5916 expires 12/31/26, last inspected by the 03/19-20/24 and by the state 01/15/26, USDA 55-1886 last inspection 04/21-22/25. The facility is located in an industrial/farming area and based on the documented risk assessment FS-02-008 Location Analysis (Rev 1, 01/01/26) and at the time of the audit there was no indication of activities occurring in the surrounding areas that would interfere with the operations of the facility.

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: N/A

Evidence: • The site does not maintain any waste traps, all production waste goes to the wastewater treatment facility – the site does have a lift station that assist in pumping the product to the wastewater treatment facility.

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: N/A

Evidence: • There are no pipes carrying sanitary waste or production wastewater overhead in the facility.

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: Floors are easily cleanable, properly graded for drainage and made of appropriate material. Drains located onsite appear to be fit for purpose and do not appear to pose a food safety risk. The site communicated and documented in their Food Safety Plans that there is no overhead duct work in the facility (waste, water, steam) that would create food safety issues. The site does not maintain any waste traps, drains contain screens that are cleared during production and as part of cleaning. During the physical inspection of the facility, it was noted that the conveyance of waste (drains), water and steam appear to have been designed to prevent the contamination of materials (food and nonfood) and/or product surfaces. There are no pipes carrying sanitary waste or wastewater located overhead in the facility as communicated in the Ducting, conduit, pipes risk assessment 02/02/26. Drains were observed to be located and constructed for ease of cleaning and inspection. The site maintains backflow preventers in place to minimize the risk of production wastewater traveling back into the facility. Walls, doors and partitions are of sound construction and fit for the purpose. Wall to wall floor junctions are properly constructed and easily cleaned. The site has air lines that are used to run pneumatics systems on some of the machines with no contact to product or product contact surfaces. Ducting, piping and conduit conveying services were properly designed and installed to prevent contamination and for ease of cleaning as documented in Ducting, conduit, pipes risk assessment 02/02/26. Doors and windows throughout the production and warehouse areas appeared to be fit for purpose. The ceilings in all food processing and handling areas are constructed of appropriate material, which are easily cleaned, preventing product contamination. Drop ceilings/Mezzanines were observed to allow for cleaning and inspection as needed by site personnel – there are no drop ceilings in the production or warehouse areas, only in office/commons which are all walled off from production and warehouse. 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 intensity is sufficient at inspection stations and in processing areas. Light fixtures are LED, shatterproof or protected and do not pose a threat to product safety in the production or warehouse areas.

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: The site has provided adequate space on the production floor for inspection of finished product and packaging per site requirements. Handwash stations are available in the production areas.

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: Doors (roll-up, internal/external (self-closing) man), windows and ventilation openings appear to

be adequately sealed and proofed to protect the facility against dust and/or pests. All doors (roll-up, man) and windows are adequately protected and sealed against dust or pests. Electric (ILTs) insect control devices are located in areas that do not create a food safety risk. Baited traps are not used inside production or warehouse areas.

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: Ventilation appeared to be adequate throughout the facility. There were no issues observed regarding the fans and exhaust systems located on site.

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: MN-02-003 Maintenance Tool Control and Sanitation Program (Rev New, 01/01/26), MN-02-004 Purchasing and Commissioning of Equipment and Utensils (Rev 3, 01/01/26), MN-02-002 Non-Conforming Equipment Control & Release (Rev 0, 01/01/26) and QA-02-012 Color Coding Program (Rev 5, 01/01/26) – Res – Raw, White-Pasteurized, Black-Drains Trash, Yellow- Environment, Green-Waste Water, Blue-Chemical, Grey-Maintenance along with several other procedures, documents the site's processes followed for purchasing and introducing new equipment and utensils into the facility to ensure there is no risk to food safety. Since the site was acquired by Cheese Merchants of America there has been significant investment (ongoing work was noted at the time of the audit) in the facility to bring it up to PMO standards including updating and upgrading silos, evaporators, HTST systems, cheese tables/vats. The equipment and utensils appeared to be designed/constructed with hygienic material and fit for purpose. The site maintains requirement regarding the storage of equipment, ensuring the proper segregation on food contact and noncontact equipment. All surfaces observed in the product area and warehouse were fit for purpose and effectively maintained. Tables, carts, racks and mechanical processing equipment observed in the product area and warehouse were of a hygienic design, fit for purpose and effectively maintained. All containers (tubs, bins, etc) observed in the product area and warehouse were fit for purpose and effectively maintained. The site maintains a cleaning process that requires all equipment, containers and tools to be cleaned after each product run (as part of product change over as needed). Forklifts and other vehicles used to transport products are maintained so as not to present a food safety hazard. The procedures referenced above documents the procedures for the management of nonconforming equipment ensuring equipment is identified tagged and segregated until disposition is determined (repair or disposal) in order to minimize risk to food safety and finished product specifications.

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: The site conducts monthly inspections of the external grounds documenting any issues noted and actions taken to correct the issue. No issues were observed during the physical inspection of the external grounds and surrounding areas. Roadways and dock areas were well maintained and walkways from the parking lots were paved and sealed. There were no issues observed regarding the site's drainage systems. The facility is surrounded by sidewalks, parking lots and roadways. No issues were noted with paths.

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 site utilizes internal employees to perform preventive maintenance work as well as a 3rd party to for specific areas such as Backflow preventers, Boiler and Air Compressors. Unplanned maintenance issues (equipment failures) are reported to maintenance and repairs are prioritized (Safety, Food Safety, Production etc) by the Maintenance department. The site will arrange for the 3rd party service provider to come onsite and conduct any planned or unplanned maintenance work as needed. During the physical inspection of the facility, all overhead equipment was observed to be in good repair and fit for purpose. The site requires that temporary repairs be approved by production and/or maintenance management, not present a risk to food safety, be dated and a WO opened to ensure a permanent repair is done – none were noted during the audit. No issues were observed regarding the storage and usage of food grade and nonfood grade lubricants/chemicals. Only approved paints were used in this facility on non-product contact surfaces. Paint was not observed being used on product contact surfaces.

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: All employees and visitors, including contractors, are required to adhere to all GMP requirements as documented in the site's GMP and training procedures. Members of the Maintenance team are required to document in the work order that all tools, parts and debris are removed from the area when work is

completed. Equipment cleanliness and tool removal is required to be completed by technicians prior to returning equipment to production.

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: MN-02-001 Calibration Program (Rev 6, 01/01/26) documents how the site is managing their equipment calibration requirements. The equipment listed on the register includes m Scales, Thermometers, Plate Heat Exchangers, Salt Analyzer, Fat and Moisture Analyzer, pH Meters, Metal Detection calibrated internally daily and annually by a 3rd party vendor and/or as needed. All in-house and 3rd party calibrations/verifications utilize accredited vendors and/or NIST traceable methods. The site has established calibration/verification processes based on established industry standards, the needs of the customer and the organization. The calibration procedure also provides guidance on the disposition of potentially affected products when equipment is found to be out of calibration and/or damaged. As documented in the calibration procedure, equipment is protected from damage and unauthorized adjustments. Employees are trained to contact their supervisor if they find that equipment has been damaged or is not working properly. The calibration records were current Metal detector – 10/10/25, Truck Scale – 12/26/26, Plant Scales – 08/13/25, Thermometers – 01/08/26, Plate Heat Exchangers – Whey Plant 02/18/26, Plate Heat Exchangers – Cheese Plant 08/12/25, Salt Analyzer as needed and documented on the QA-01-017 Chloride Salt Analyzer (Rev 1, 05/01/23), QA-01-018 pH Meter Calibration Record (Rev 3, 10/16/23) random dates from October

2025-February 2026 Fat and Moisture Analyzer – calibration records are maintained within the machine (FOSS FoodScan 2).

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: • The site does not store any pesticides on site.

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

Response: Compliant

Summary -

Response: QA-02-031 Pest Control Program (Rev 6, 01/01/26) and the Service Agreement (01/12/26) document

the site's requirements for management of their pest control program which has been implemented. All pest control services are being conducted by a 3rd party vendor. Proper hygiene, cleaning and additional applicable GMP practices have ensured that the site is not conducive to supporting pest activity. The contracted pest control company utilized approved pesticides, with proper application documentation maintained on file (Nibor-D Insecticide, Talon Weatherblox XT was verified). Service was conducted by the contracted company on a weekly basis for interior rodents and monthly for flying insects, exterior rodents and pest birds. Trip reports from 02/23/26, 02/16/26, 02/09/26, 02/02/26, 01/26/26, 01/19/26, 01/12/26, 01/07/26, 12/29/25, 12/17/25, 12/01/25, 10/27/25 were randomly chosen for review and were in good order. The device maps were dated 02/23/26 (21 EXT, 46 INT, 21 ILT). The pest control company held a current business license, PCO license and liability insurance. The Pest Control Operator (PCO) works directly with designated personnel when on site, ensuring the site is informed of any issues during the PCO's visit. The PCO will conduct an annual (01/19/26) review of the site's overall program including a pest prevention audit and trending which includes rodent and insect activity. The company has documented requirements in place to address how products contaminated by pest activity are to be segregated and properly disposed of to ensure the product is removed from the product process. The site does not store any pesticides on site. Animals are not permitted inside the office, production or warehouse areas.

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: Procedures including WI 7-4-379-2165 Pre-Manufacture Sanitation (Rev C, 04/12/21) for all equipment and production/warehouse areas document the site's requirements regarding cleaning procedures to be followed. The site maintains cleaning chemicals in a locked area (accessible to only designated personnel), detergents and sanitizers are dispensed automatically from dispensers located at the cleaning stations. The site maintains an SDS binder for all cleaning chemicals that are onsite. Employees are trained on all cleaning requirements with signs posted as well. The site monitors the sanitizer levels via titration and pH checks that are documented on the production paperwork. A 3rd party vendor also monitors the detergent and chemical inventory – the report includes monthly inspections of dispensing equipment, chemical inventory, titration, etc. CIP systems are used by the site, processes are effectively maintained and monitored by trained personnel per records reviewed. All equipment and tools used to clean and support cleaning efforts are properly stored, used and maintained to support the site's efforts to maintain and effectively cleaning program of the entire facility and no risk to food safety. Production employees are required to "clean as you go" to ensure that food safety is not at risk and the operators are responsible for documenting cleaning on their production paperwork. The site does not maintain a dedicated sanitation team or shift, production/warehouse personnel are responsible for cleaning all production/warehouse areas. Cleaning/Sanitation of production equipment is conducted based on the production schedule, following a product run, the equipment is client via CIP, COP or Manually by the trained production staff who are also responsible for taking ATP swabs to verify effectiveness of cleaning. The Quality Department is responsible for reviewing/verifying the cleaning/sanitation records SN-02-001 Tanker CIP (Rev 1, 12/17/25), SN-02-002 Sanitation Program (Rev 07/22/25), SN-02-003 Drain Cleaning Program (Rev 2, 07/22/25), SN-02-005 HTST CIP

(Rev 2, 04/28/25), SN-02-006 UF CIP (07/22/25), SN-02-008 VAT CIP (Rev 1, 07/22/25), SN-02-009 Table CIP (Rev 1, 07/22/25), SN-02-010 General Foam Cleaning (Rev 1, 07/22/25), SN-02-011 Cleaning-Procedure-Floor and Areas (Rev 1, 07/22/25), SN-02-012 Whey-Lecithin Doing CIP (Rev 1, 07/22/25), SN-02-013 Tower CIP (Rev 1, 07/22/25), SN-02-014 Water Flush Tank CIP (Rev 0, 07/22/25), SN-02-015 Clarifier and Separator Wash (Rev 1, 07/22/25), SN-02-016 Cream Tank #1 (Rev 1, 07/22/25), SN-02-017 Whey Dreyer Feed Line (Rev 0, 07/22/25), SN-02-018 Whey Polisher (Rev 1, 07/22/25), SN-02-019 Whey HTST (Rev 1, 07/22/25), SN-02-020 Whey RO (Rev 1, 07/22/25), SN-02-021 Whey Short Line (Rev 1, 07/22/25), SN-02-022 Whey Silo 7 & 8 (Rev 1, 07/22/25), SN-02-023 Whey Silo 10 & 11 (Rev 1, 07/22/25), SN-02-024 Whey Silo 1-6, 12, 17 (Rev 1, 07/22/25), SN-02-025 Whey UF (Rev 1, 07/22/25), SN-02-026 Milk Separator CIP (Rev 1, 07/22/25), SN-02-027 Cooling Systems CIP (Rev 1, 07/22/25), SN-02-028 Vacuum Sealer cleaning (Rev NA, 07/11/25) for 2025/2026. All cleaning/sanitation records were in good order including SN-01-003 Daily MSS (08/24/25), SN-01-002 Monthly Drain Cleaning Log (07/13/25), SN-01-001 Weekly Drain Cleaning Log (07/13/25), SN-01-004 Daily Breakroom, Locker and Restroom Cleaning (08/01/25). Quality will also take nonpathogen and pathogen swabs as part of their environmental monitoring program to further verify the effectiveness of the cleaning/sanitation processes.

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: FS-02-002 Good Manufacturing Practices (GMP) Program – Employees, Visitors and Contractors (Rev 6, 01/01/26) documents the requirements for medical type screening and precautions related to infectious diseases. The site's GMP procedure prohibits chewing, smoking, eating, spitting, drinking and/or any type of bodily fluid in the production or warehouse areas. Abrasions and cuts are treated and covered with a colored metal-detectable bandage.

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: FS-02-002 Good Manufacturing Practices (GMP) Program – Employees, Visitors and Contractors (Rev 6, 01/01/26) documents the site's handwashing requirements for all personnel entering and working in the production or warehouse areas. Handwash stations are located at accessible points throughout the production and warehouse areas. The hand wash stations were observed to have warm potable water, liquid soap, paper towels, trash cans, hands free operating sinks and hand sanitizer. The hand washing stations in the production areas are hands free. Signs are posted at handwash stations, exit to the breakroom and restrooms. Handwash requirements are required to be followed (all personnel entering the production room are required to wash their hands, also after cleaning, picking materials off the floor and/or when they become dirty) in addition to gloves being required for all employees handling product.

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: FS-02-002 Good Manufacturing Practices (GMP) Program – Employees, Visitors and Contractors (Rev 6, 01/01/26) and QA-02-033 Clothing and Protective Garment Requirements (Rev 3, 01/01/26) documents the site's requirements regarding clothing and hair. Clothing worn by all personnel entering the production area is required to be clean and neat. Clothing (company provided pants, shirt, lab coat and/or Tyvek suit), shoes and/or shoe covers in the High Hygiene production area worn by all personnel entering the production area is required to be clean and appropriately maintained during the shift to minimize any risk to food safety. Clean disposable gloves are provided by the site and is required to be worn when performing specific tasks only. Gloves are required to be removed before using the restrooms and breakrooms. Soiled gloves are to be changed for new gloves as needed. Protective clothing (company supplied pants, shirts, lab coats and/or Tyvek suits) are required to be worn in the High Hygiene production areas. All pants, shirts, Tyvek suits/jackets, lab coats, shoe covers, hair and beard nets are stored outside the High Hygiene production areas to ensure employees have access and minimize any potential food safety risks. Hooks are available for employees to hang clothing when leaving the High Hygiene production area. Personal items are not permitted in the High Hygiene production area - lockers are available for employees to store their personal items. Jewelry is not allowed in the High Hygiene production. Loose and/or hanging items are not allowed in the High Hygiene production area.

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: FS-02-002 Good Manufacturing Practices (GMP) Program – Employees, Visitors and Contractors (Rev 6, 01/01/26) documents the requirements visitors are expected to follow. Information provided includes clothing/footwear requirements, conduct while on the premises and product safety (handwashing, medical issues, etc). Visitors and management are required to wear suitable clothing and footwear when entering any production or storage area. Jewelry is not allowed in the production or warehouse areas. Loose and/or hanging items are not allowed in the production area. Visitors are not allowed to enter the facility if they have visible signs of being ill. Visitors are required to enter the production and warehouse areas through designated entrances and sign in.

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: The site maintains several cleaning procedures including the Risk Assessment: Shared Locker and Breakroom Space 02/02/26 which documents the cleaning requirements for the Breakroom, restrooms, employee entrance and other common areas. Lighting and ventilation in these areas appeared to be adequate. The site provides lockers for production personnel personal items and change rooms for all personnel entering all production areas including the designated high hygiene areas. All required PPEs are donned/doffed prior to entry into the high hygiene production areas. Employees are required to change their smocks when they become excessively dirty. The site does provide showers onsite and they appear to be effectively maintained. The facility has sufficient restrooms that are designed so that they are not directly accessible from any manufacturing or warehouse areas. All restroom facilities were adequate for all personnel, easily cleaned and maintained. Restroom cleaning tools are appropriately maintained. The drainage is set up to ensure there is no risk to food safety. Sanitary drainage goes to the offsite production wastewater facility approximately 0.25 miles away and the site has contracted a 3rd party vendor to manage the facility. Handwash stations are available at the entrance to production, in the production areas and in all restrooms. The breakrooms are located separately from the production and warehouse areas. The breakrooms provide access to vending machines, water, refrigerator and microwave. Review of cleaning records and during the physical inspection of the facility, it was observed that the common areas were being effectively maintained.

Designated outside eating and smoking areas were observed to be effectively maintained.

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: Compliant

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: N/A

Evidence: • Sensory evaluation for cheese is conducted by production personnel in the Quality Lab – no evaluations are conducted in the production areas.

Summary -

Response: Employees are trained/informed that food and beverages are to be stored and consumed in designated areas (breakrooms and offices). Bodily fluids of any kind are not permitted in the production and warehouse spaces. The consumption of any tobacco products is only allowed in a designated area outside the facility. The site maintains several procedures that document site requirements for the movement of people throughout the facility to minimize risk to food safety. The site maintains a personnel, process and material

flow through the facility to minimize any risk of cross contamination due to people and/or materials movement. QA-01-007 Cheese Grading Sheet (07/01/25) documents the processes to be followed by the site to conduct sensory evaluation (texture) on finished product. Sensory evaluation for cheese is conducted by production personnel in the Quality Lab – no evaluations are conducted in the production areas. All tools and equipment used by trained personnel are properly maintained to minimize any risk to raw materials and finished product.

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: • All water supplied to the facility is potable.

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

Response: Compliant

Summary -

Response: Potable water is supplied to the facility by 5 different wells located on the property. Hot and cold water is readily available in the production area, restrooms, break area and handwash stations. Potable Water Contingency Plan 02/02/26 documents sites procedures to be followed in the event that issues arise with the well water supplied to the facility. The site will purchase water from Wisconsin Rapids (city water). At the time of the audit, the site appears to have a sufficient amount of water being supplied to the facility. The building is owned by the company and they arrange for the backflow preventers (2 units) to be checked annually by a 3rd party vendor. The most recent service was conducted 09/22/25 with no issues reported. All water supplied to the facility is potable – passed through a sock filter (Weekly PM to replace the sock filter – removes solids, clay, minerals down to 5 microns – last filter change 02/23/26) and tested daily as documented in LB-02-008 Water Testing (Rev New, 01/01/26) (daily well water testing for SPC, coliform, Yeast and Mold). The site maintains 2

dedicated silos for maintaining well water and the state will test well water every 6 months for Coliform – most recent records reviewed 02/25/26 with a positive for Coliform and a retest for E.coli which came back not detected.

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 does not maintain any wastewater treatment processes on site. All production waste is sent to an offsite facility approximately 0.25 miles away and the site has contracted a 3rd party vendor to manage the facility.

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 does not maintain any wastewater treatment processes on site. All production waste is sent to an offsite facility approximately 0.25 miles away and the site has contracted a 3rd party vendor to manage the facility.

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 does not maintain any wastewater treatment processes on site. All production waste is sent to an offsite facility approximately 0.25 miles away and the site has contracted a 3rd party vendor to manage the facility.

Summary -

Response: The site does not maintain any wastewater treatment processes on site. All production waste is sent to an offsite facility approximately 0.25 miles away and the site has contracted a 3rd party vendor to manage the facility.

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; orvii. 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 to the facility by 5 different wells located on the property. Hot and cold water is readily available in the production area, restrooms, break area and handwash stations. Potable Water Contingency Plan 02/02/26 documents sites procedures to be followed in the event that issues arise with the well water supplied to the facility. LB-02-008 Water Testing documents the minimum requirements for testing potable/well water which requires daily well water testing for SPC, coliform, Yeast and Mold. The site maintains 2 dedicated silos for maintaining well water and the state will test well water every 6 months for Coliform – most recent records reviewed 02/25/26 with a positive for Coliform and a retest for E.coli which came back not detected. All records reviewed were in good order.

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 their production 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 their production 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 their production process.

Summary -

Response: The site does not use ice in their production 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: LB-02-007 Air Testing (Rev New) and QA-02-039 Environmental Monitoring – Equipment, Drains and Plant environment (Rev 0, 01/01/26) document the process to be followed by the site. The site requirement is to conduct testing of facility (environmental) air daily for Yeast and Mold in designated processing areas. Records reviewed for 2025/2026 and the site trends the data addressing any issues noted – 2025 the site saw a spike in mold and conducted defogging exercises (08/22-23/26). Compressed air is used once a say to clear the raw milk line and it is tested monthly for SPC, Coliform, Yeast & Mold and records were reviewed from 06/20/25, 07/15/25, 08/13/25, 09/15/25, 10/14/25, 12/10/25, 01/12/26, 02/11/26. The site does not purchase any gases that are used in their process.

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: N/A

Evidence: • The site does not use alternate or temporary storage.

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: N/A

Evidence: • The site does not use alternate or temporary storage.

Summary -

Response: The site maintains processes that they follow for the management and storage of raw materials, food packaging, rework, equipment and chemicals are to ensure FIFO requirements are followed as documented in QA-02-032 Shipping and Receiving Program (Rev 6, 01/01/26). Controls are in place to ensure

all materials are properly stored and maintained to minimize the risk of cross contamination. Storage rooms were designed and constructed to allow for hygienic storage of equipment, materials, and containers. Monthly internal audit inspections are conducted to further monitor and manage the area. The site does not use alternate or temporary storage.

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: Staff trained in the operation and maintenance of refrigeration systems are employed by this location. These individuals are responsible for maintaining records of service and monitoring performance of refrigeration systems daily to ensure refrigeration capacity is capable at maintaining raw materials and finished goods at appropriate temperatures. Both electronic and manual temperature monitoring records are maintained by plant and quality personnel. Devices provided for monitoring cold/frozen temperatures are verified and calibrated as needed by QA Personnel. Cold storage temperature monitoring devices are located throughout cold storage department, including near docks/entrances or where otherwise risk of warming could occur. Auditor verified temperatures at time of inspection were maintained at temperatures appropriate for the material or product being stored. During the audit, the auditor visually verified defrost and condensate lines were channeled into drainage system or out of refrigerated storage departments.

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: Dry storage areas were fit for purpose and effectively maintained to minimize risk to raw materials and finished product. Metal racks are used in all the warehouse areas. The review of the warehouse cleaning schedule and documented inspections were in good order. The areas were observed to be properly maintained at the time of the audit.

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,: 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: SN-02-002 Sanitation Program (Rev 07/22/25) provides guidance regarding the labelling and storage of chemicals that might create a food safety risk. Chemicals are required to be stored in locked areas when not in use in properly labelled and sealed containers, away from any product, packaging materials, ingredients, product handling equipment and/or utensils. The site maintains an inventory of chemicals, most of which were observed to be properly labelled and stored. Random chemicals found onsite CRC Screw Loose Super Penetrant, Gunk Brake Parts Cleaner, SIKA ProSelect Concrete Mix, ALPET E3+, Nyco Arrest, Dawn, Sanitary Petrol Gel Lubricant were used to verify that the site is maintaining control of their chemical inventory. Chemicals are stored in locked areas when not in use. The employees designated to conduct sanitation/cleaning are responsible for handling all detergents and sanitizers which are automatically dispensed ensuring they are properly utilized. Production personnel will use RTU sanitizers in spray bottles during production for required cleaning through the production shift. All employees are trained regarding the site's chemical control program and are required to follow the procedure. The site does not allow chemical bottles to be repurposed. Spray bottles are designated for what chemical should be used and are not to be reused for anything other than the intended chemical use. Spill kits are stationed throughout the facility.

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: QA-02-032 Shipping and Receiving Program (Rev 6, 01/01/26) documents site requirements for unloading and loading materials to ensure they receive, maintain and ship properly. Delivery vehicles (receiving and shipping/refrigerated and nonrefrigerated) are required to be inspected for temperature, trailer condition, product temperature, BOL/Order#, COA, Seal, Customer/Lot#, Driver ID Check. Manual inspection records are maintained for inbound inspections WH-01-001 Receiving Checklist (Rev 1, 03/13/23) and outbound inspections WH-01-002 Shipping Checklist (Rev 1, 03/13/23). Full trailers are required to be sealed per customer requirements and the seal number must match the number documented on the paperwork. The dock area appeared to be effectively maintained, there were no issues noted during the audit. Materials requiring cold storage are placed in the proper storage area.

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/segregated 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 site has been designed with hygienic zoning and separation - finished products produced by the site is made for additional producing. A hygienic zoning map has been included within the environmental monitoring program risk assessment. The site requirement is to conduct testing of facility (environmental) air daily for Yeast and Mold in designated processing areas. Records reviewed for 2025/2026 and the site trends the data addressing any issues noted – 2025 the site saw a spike in mold and conducted defogging exercises (08/22-23/26). Compressed air is used once a day to clear the raw milk line and it is tested monthly for SPC, Coliform, Yeast & Mold and records were reviewed from 06/20/25, 07/15/25, 08/13/25, 09/15/25, 10/14/25, 12/10/25, 01/12/26, 02/11/26 and no issues were reported. The production area has been identified as a high hygiene zone and hair nets/beard snoods, shoe covers (or captive shoes), designated lab coats or uniforms are required. The Don/Doff areas have been designed to allow employees to put on hair nets/beard snoods, shoe covers or change out shoes as well as put on their uniform and/or lab coat designated for the area when entering a zone of higher hygiene. Doorways between production department and other plant functions are protected from cross contamination by automatic floor/foot traffic spray units. Employees working in the high hygiene areas were observed to follow high standards of personal hygiene with minimal risk to the controlled environment and products. The liquid product is transferred through a predominately enclosed system except for transfers from the cooker to the hopper where metal detection checks are conducted and the filling area.

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: • The site does not receive any ingredients that require thawing.

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: • The site does not receive any ingredients that require thawing.

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: • The site does not receive any ingredients that require thawing.

Summary -

Response: The site does not receive any ingredients that require thawing.

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: Compliant

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: Minor

Evidence: • During the physical inspection of the facility a light cover was noted to be broken and missing pieces in the Vacuum pump area, but there was no documented record of the breakage incident. There was no open product in the area.

Root Cause: The root cause of the non-conformance was the absence of a standardized breakage incident reporting form and insufficient emphasis during training on documenting glass and brittle plastic damage, resulting in the incident not being formally recorded despite the program being in place.

Corrective Action: The broken light cover identified in the vacuum pump area was immediately taken off, and the area was inspected to confirm no open product was present and no contamination risk existed. A review of the Glass and Brittle Plastic Program identified that while inspections were being conducted, a standardized breakage incident reporting form was not in place, resulting in the incident not being formally documented. To address this: The Glass and Brittle Plastic Policy (QA-02-013) was updated in both English and Spanish to strengthen documentation and reporting requirements. A Glass and Brittle Plastic Breakage Incident Report Form (FS-07-001) was developed and implemented. The procedure now clearly defines that all breakage incidents must be documented by the supervisor, with QA notification and evaluation. Requirements for product hold and QA approval in case of potential exposure were reinforced in the SOP. Employees were trained on the updated procedure. A knowledge verification quiz was implemented to confirm employee understanding of reporting and response requirements. QA Supervisor will verify compliance through pre-operational inspections and internal GMP audits.

Verification Of Closeout: The corrective, root cause analysis and corrective action plan has been reviewed and accepted. The site has removed the broken light, inspected the area to ensure no other impact was noted and reviewed and updated as needed, the Glass and Brittle Plastic program to ensure inspections are being conducted and effectively documented

Completion Date: March 19, 2026 **Closeout Date:** March 20, 2026

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: QA-02-029 Control of Foreign Matter Contamination (Rev 8, 01/01/26), QA-02-037 Metal Detection Program (Rev 1, 01/01/26) and QA-02-013 Glass and Brittle Plastic Policy (Rev 05, 01/01/26) documents the site requirements for the management and control of foreign material risk. All employees are trained to ensure they are aware of the requirements. The site does not have any containers, vessels, utensils or tools made of glass or ceramics. Tools and equipment made of plastic and thermometers with glass covers are monitored by operators and inspected by supervisors and Quality Assurance throughout each production day any damage to the thermometers is reported on designated production documentation along with the action taken to address/correct the issue. Monthly GMP inspections are documented on REG-002 Glass and Brittle Plastic Audit and the records from 02/20/26, 01/29/26, 12/09/25, 11/10/25 and 10/16/25 were reviewed. QA-02-013 Glass and Brittle Plastic Policy (Rev 05, 01/01/26) documents how the site should handle any breakage issues. The site did not have any recent documented reports of breakage issues but an issue of breakage was noted during the audit. The site maintains requirements for managing wood pallets that are used in the facility which are required to be inspected prior to use as documented on QA-02-029 Control of Foreign Matter Contamination (Rev 8, 01/01/26). Pallets should be in good structural condition, clean, dry, free of visible stains/discoloration off odors or any other signs of contamination. The site has a policy in place to ensure no loose metal objects impact product or equipment. The site provides designated knives for employees to use for product contact cutting and they are differentiated from knives used for non-product contact cutting. Snap-off blades are not permitted. The site will inspect the condition of equipment (including gaskets and other pliable and no pliable parts) during sanitation and as part of start-up to ensure there are no issues with any aspect of the equipment that could create a food safety hazard. Minor 11.7.3.5 – During the physical inspection of the facility a light cover was noted to be broken and missing pieces in the Vacuum pump area, but there was no documented record of the breakage incident. There was no open product in the area.

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: QA-02-029 Control of Foreign Matter Contamination (Rev 8, 01/01/26) and QA-02-037 Metal Detection Program (Rev 1, 01/01/26) documents the process followed by the site regarding the metal detectors, filter/screens and magnets used in the production process. Three types of metal are detected Cheese 6.0mm Stainless Steel/5.0mm Non-ferrous/4.0mm Ferrous and Whey 1.5mm Stainless Steel/1.0mm Non-ferrous/1.0mm Ferrous with limits that are aligned with regulatory, industry and customer requirements. The site requirement is to check the metal detector at a minimum of every hour by running each metal sample through the metal detector. Metal detection checks are documented on the QP-01-015 Metal Detection Log (Rev 1, 01/09/24) (Cheese), DP-01-011 Dryer Metal Detector Log (Rev New, 10/02/23) and records for production dates 02/20/26, 01/29/26, 12/09/25, 11/10/25 and 10/16/25 were reviewed and in good order. If the metal detector alarms when product passes through, the product will be ejected from the product stream into a designated bin. Employees are trained to isolate product if it fails to clear the metal detector as well as contact management and Quality. Suspect product will be screened by trained personnel to locate the metal, conduct any further product review as needed and determine disposition of all potential product impacted.

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: N/A

Evidence: • There is no customer trademark packaging.

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 site has processes in place for the management of dry waste, disused packaging (there is no customer trademark packaging) and liquid waste generated during production as documented in FS-02-009 Waste Management Policy (Rev 1, 01/01/26). Production and nonproduction waste is removed from the facility daily as needed. Process and sanitation equipment is designed to overflow or is directed to floor drains per industry standards. All equipment used to transport raw materials, WIP and/or finished product was observed to be fit for purpose and effectively maintained. The site maintains an effective process for disposal of all production related product waste. The site does maintain a by-product stream documented in their HACCP programs where by-product /waste is designated to be sold to a customer for further processing to be used as

animal feed. All waste is removed from the production and warehouse areas at the end of the production day and disposed of per site requirements. Production generated liquid and solid waste were observed to be contained and disposed of per environmental regulations. All liquid production waste is sent to a drain and is sent to the Wastewater Treatment that is located approximately 0.25 miles away. GMP inspections (daily by production and Quality as well as monthly by Quality) include review of the waste management program. There is no customer trademark packaging.