



Food Safety & Quality Answeraire

Ardent Mills, LLC – United States facilities – Wheat & Gluten
Containing Flour Products

Last updated: 10/19/2023

Contents

Contents 1

Section 1: General Information 2

 Company Information 2

 Manufacturing Process Overview 2

 Certifications..... 2

 FDA Registration 2

 Food Safety & Quality Policy 3

 Foreign Material and Preventative Control..... 3

Section 2. Production Areas/Facility Security/Food Defense..... 5

Section 3. Raw Materials and Packaging 7

Section 4. Process Facility and Equipment..... 9

Section 5. Process Controls..... 10

Section 6. Quality Assurance12

Section 7. Product Protection and Foreign Bodies.....13

Section 8. Cleaning and Housekeeping16

Section 9. Personal Hygiene and Personnel.....17

Section 10. Laboratory and Product Development..... 18

Section 11. Pest Control and Waste Management19

Section 12. Policies and Procedures.....21

Section 13. Food Safety 23

Section 14. Feed Safety.....25

Section 15. Environment, Health, and Safety.....26

Section 16. Food Allergens.....27

Section 17. Sustainability.....29

Section 18. Regulations.....31

Section 1: General Information

Company Information

Ardent Mills, LLC was established in 2014, as an independent joint venture between Cargill Inc., ConAgra Brands and CHS Inc.

Ardent Mills, LLC - Headquarters
1875 Lawrence Street, Suite 1400, Denver, CO 80202
1-800-851-9618
www.ardentmills.com
info@ardentmills.com

Manufacturing Process Overview

Ardent Mills, LLC (hereafter referred to as “Ardent Mills”) produces several commercial and retail flour grades, including spelt, triticale, mixes from spring, winter, durum, and soft wheat varieties, products derived from the milling of wheat grain, such as wheat bran and wheat germ, as well as barley and rye flours. The grain is delivered to the mill in rail cars and trucks, analyzed against the requirements of our grain receiving policy, unloaded, and binned. If applicable, it is then blended for uniformity and to meet specifications¹. The grain is then transferred to the cleaning equipment where the dust, stones, chaff, corn, and other foreign material, collectively referred to as screenings, is removed. When required, potable water is then added to the cleaned grain and allowed to temper for a period of time before being transferred to the mill. Once the grain is delivered to the mill, it is ground and sifted into flour. Micro ingredients are added to the flour during the milling process or at load out per customer requirements. The finished flour is sifted prior to being loaded into bulk cars, bulk trucks, or packed into bags of various sizes and palletized. A multitude of procedures, checkpoints, analyses, and good manufacturing practice (GMP) standards are applied throughout the process.

Certifications

- British Retail Consortium (BRC) Global Standard for Food Safety, Issue 9 - GFSI recognized standard
- Kosher Parve certified by KOF-K
- Certified Organic by Oregon Tilth under the US National Organic Program (select facilities)

FDA Registration

Ardent Mills is compliant with the U.S. Food and Drug Administration (FDA) Public Health and Bioterrorism Preparedness and Response Act of 2002 requirement that all domestic and foreign food facilities be registered with the FDA. There is no requirement under the Federal Food, Drug and Cosmetic Act, its Interim Food Rule, or the Freedom of Information Act to disclose our registration numbers. Amendments made by the Food Safety Modernization Act of 2011 (FSMA) added the requirement that all domestic and foreign food facilities renew their food facility registrations with the FDA between October 1 and December 31 of each even-numbered year. Ardent Mills has completed and maintains registration in compliance with FSMA amendments to the Bioterrorism Preparedness and Response Act.

¹ If the agreed upon specifications for the flour products, or other agreement between the parties, specify the class or classes of wheat to be used in the production of the flour products (the “Specification Class”), the Specification Class shall be interpreted in accordance with the definitions of wheat classes set forth at 7 C.F.R. §§ 810.2202-2204. The wheat used in the production of the flour products may therefore contain up to 10% of a class of wheat other than the Specification Class.

Food Safety & Quality Policy

Ardent Mills is committed to nourishing what's next by ensuring food safety through diligence in all that we do, from product development, procurement, production, and transportation systems, to deliver safe, quality food to our customers.

We will proactively lead in food safety and food defense through the development, implementation, and continuous improvement of robust food safety standards. We will communicate and serve our employees through effective training to flawlessly execute on our food safety requirements in all activities. We will communicate and serve our communities by partnering with our customers, suppliers, and service providers to promote best practices in food safety for the enhancement of human health. We will ensure the safety and regulatory compliance of our food through the diligent selection of suppliers and service providers that meet our food safety requirements. We will comply with all applicable federal, provincial, state, and local laws and regulations, as well as industry leading food safety standards.

Foreign Material and Preventative Control

We manage foreign material risk through a combination of GMPs and policies that have been proven to provide delivery of a safe product reliably to our customers. We have programs that are followed to ensure foreign material is controlled. We have an inclusive glass and brittle plastics policy, a sanitation program that encompasses cleaning tools, floor sweepings, color coding, and feed in stations, a detailed maintenance policy, and ingredient receiving policies.

The below highlights our programs through our process flow:

1. Grain enters our facilities and must meet requirements specified in our grain receiving policy, which states the grain must be disease free, have no off odors, be free of foreign material, have no glass, and have no live infestation. If the wheat does not meet these requirements, it is rejected and is not unloaded into the facility.
2. The grain will then move into the cleaning house, where it moves through equipment designed to remove foreign material from the grain, such as stones, dirt, etc.
3. After the grain undergoes the temper process (when required), it is sent to first break, where the kernel is broken open to remove the flour products. The flour products are sifted at a bare minimum of one time, but usually many times before it is the correct particle size.
4. Once the flour products are the correct particle size, it passes through the mill rebolt sifter where the common clothing size of the sieves is 180 microns. From the mill rebolt sifter, the flour products go into storage bins.
5. From the storage bins, flour products go into the final product sifter – Please see Table 1 for the maximum clothing size of the sieves for our various products. There is a scalp-screen or basket in the final product sifter to protect the sieves. Final product sifter inspection and the final product sifter tailings policies are followed to monitor this area. The final product sifter is inspected at a minimum of biweekly to ensure all screens are intact. If any foreign material is found in the final product sifter tailings that could potentially cut the sieves, the system is immediately shut down and the sieves are inspected for integrity. The load(s) in question are put on hold until we can be sure that the load(s) does not contain any foreign material.

Table 1: Maximum clothing size of sieves

Product	Maximum Sieve Size
Wheat Patent Flour, Durum Patent Flour, Clear flour, UltraGrain whole wheat flour, Sustagrain fine flour, Aleurone, Malted barley flour	475 micron
Farina	1000 micron
Fine and medium whole wheat flours, Semolina	1400 micron
Food grade bran	4000 micron
Coarse whole wheat flour	5000 micron
Wheat germ	½ inch

6. As soon as flour products enter the final product sifter, until it is loaded into a vessel, the area is classified as the final product zone (FPZ). No work can be performed on any piece of equipment in this area without obtaining a permit. The area is designed to not allow easy access to the product. All employees are trained that the FPZ must be well-maintained, as this is the final area the flour products touch before it is sent to a customer.
7. The flour products then pass through a magnet, which is inspected each day and all findings are documented. If anything abnormal is found on the magnet, the system will be shut down and inspected. All flour products in question will be put on hold. We will notify any customers for which our risk assessment concludes there is a food safety hazard.
8. The flour products are then loaded into a vessel or packaged. If packaged into bags, the bags pass through a metal detector prior to loading. Every type of vessel is thoroughly inspected and documented following our vessel inspection/loading procedure. All vessels are sealed with tamper-evident security seals.
9. Once the flour product arrives at the customer, if it is in a bulk vessel, the flour product will pass through the unload screen on the unload hose before entering a customer bin.

Ardent Mills invests time in training our employees on the importance of following all food safety policies and procedures. We have standardized work procedures to remove variations from employee to employee. We perform monthly observations to ensure job tasks are being performed correctly, to reinforce training, and to build a positive working relationship between employees and supervisors.

It has been our experience that the programs that we have in place, as noted above, protect us, as well as those facilities with this equipment. Our risk mitigation throughout the process, through equipment and procedures, allows us the opportunity to proactively eliminate/reduce risk, as needed, to ship safe products to our customers. Please note that in our standard supply chain, Ardent Mills does not process our flour products made from raw agricultural products to control pathogens. As flour is not a ready to eat product, these flour products are intended to be further processed to significantly minimize or prevent the risk of pathogens. This is often accomplished with a lethality step, such as baking, cooking, frying, or boiling. Please note that Ardent Mills offers a risk reduced flour for Ready to Bake applications (BakeSafer™), and a heat-treated flour for Ready to Eat applications (SafeGuard®). For more information about these products, please contact your Sales Representative.

Section 2. Production Areas/Facility Security/Food Defense

	Item	Yes/No	Comments
2.1	Is the building constructed of sound brick, block, or prefabricated construction giving total protection from the elements?	Yes	
2.2	Is the roof sound, secure, and without leaks?	Yes	
2.3	Are the areas surrounding the facility concreted or similarly hard surfaced?	Yes	
2.4	Are the areas surrounding the facility adequately lit at night?	Yes	
2.5	Does the facility conduct a food fraud vulnerability assessment and document results?	Yes	Ardent Mills reviews these areas in different processes appropriate to the risk. At the corporate level, food fraud is reviewed as part of an annual risk assessment. This includes review of information from industry associations, state universities, Federal Grain Inspection Service, as well as with other resources. Our flour facilities have a limited number of suppliers. Wheat is the primary ingredient. It is inspected and graded to meet Federal Grain Inspection requirements. The enrichment and packaging suppliers conduct risk appropriate review of their suppliers.
2.6	Does the facility have a documented food defense/security program, including a food defense team and audit?	Yes	Key program elements include: <ol style="list-style-type: none"> 1. Incoming ingredient and packaging material control 2. Outgoing product vehicle sealing 3. Plant security to prevent unauthorized access 4. Lot tracking 5. Laboratory access to restricted chemicals 6. Computer access 7. Employee hiring process A vulnerability assessment and review of mitigation actions is conducted and managed with our Environmental Health and Safety Team. This information is reviewed and any follow up action is taken by the facility management team.
2.7	Is the facility and final product secured?	Yes	The facility is secured by controlled access.

2.8	Does Ardent participate in C-TPAT certification?	No	Participation in this program is voluntary through the Department of Homeland Security, and, as such, the department has specific criteria regarding minimum requirements. Currently, we do not meet the minimum number of international shipments to participate in the program. Please be assured that any international shipments that are utilized or imported fall under the inspection protocols of the Food and Drug Administration.
2.9	Are pallets or equipment stored outside adequately protected from the elements and contamination?	Yes	Pallets for food grade products shall be stored in a dry, covered area. Pallets stored outside that are not covered and exposed to the elements shall not be used for food grade products. Pallets shall be inspected prior to use. Pallets shall not be used that have protruding nails, broken boards, odors, or evidence of pest activity.
2.10	Do production workers enter the buildings only through specific, clearly marked entrances?	Yes	
2.11	Do any adjoining premises represent a hazard to the product, e.g., chemical facility, radiological, glassworks, etc.?	No	
2.12	Is dispatched product adequately protected from the elements before and during loading?	Yes	
2.13	Are the vehicles used to dispatch product checked for condition and cleanliness?	Yes	There is a dedicated fleet of bulk trailers for our product and the trailers are washed on a 28-day cycle. All trailers, (van and bulk) are inspected prior to loading. Railcars are inspected and documented prior to loading and dry cleaned before each load.
2.14	Is the ceiling smooth and without crevices or ledges that could gather dust and debris?	Yes	Manufacturing takes place in fully enclosed equipment. The building is designed for flour milling.
2.15	Is the lighting adequate for the work being done in the area?	Yes	

2.16	Are all light tubes/bulbs protected from accidental breakage?	Yes	A glass and brittle plastics policy is in place. The facility has an inventory of all glass and brittle plastic present in the production and packaging area. A glass audit is performed annually.
------	---	-----	--

Section 3. Raw Materials and Packaging

	Item	Yes/No	Comments
3.1	Do agreed upon specifications with the relevant suppliers exist for the raw materials used in the manufacture of the product?	Yes	
3.2	Are these specifications reviewed regularly?	Yes	
3.3	Are raw materials checked against the relevant specification?	Yes	
3.4	Is there a traceability system in place?	Yes	
3.5	Are raw materials stored in appropriate silos?	Yes	All raw materials are stored in bulk storage silos at the facility.
3.6	Do agreed up specifications with the relevant suppliers exist for the micro ingredients used in the manufacture of the product (when applicable)?	Yes	
3.7	Does the company operate a supplier approval and management program?	Yes	Please refer to the Ardent Mills Supplier Review Process Statement. For more details about this process, please contact us at SEMTeam@ArdentMills.com .
3.8	Is there a program in place with suppliers/growers that assures pesticide usage is in conformance with the US government regulations?	Yes	This requirement is incorporated in wheat contracts.
3.9	Is there a program in place to monitor and manage mycotoxins to assure conformance of finished products to US regulations?	Yes	The primary mycotoxin issue in wheat is from Deoxynivalenol (DON), also known as vomitoxin. Each year, we review information from our sampling program across growing regions to survey conditions and results on wheat. We monitor areas of concern where DON may be present in the incoming wheat. Procedures are conducted to follow up from grading results on incoming wheat. Testing of wheat and flour is conducted as warranted to monitor levels of DON to the FDA advisory guidelines equal to or below 1 ppm for flour.
3.10	Do you use foreign suppliers?	Yes	Most wheat and ingredients used are sourced and processed in the United States and Canada, but we do have foreign wheat sources at some of our facilities. As part of the Food Safety Modernization Act, we include a review of foreign suppliers in the review process of our ingredient suppliers.

3.11	Does Ardent use GMO ingredients?	No	There are no GMO wheat, rye, durum, or barley varieties for sale or in commercial production in the United States currently, as per United States Department of Agriculture (USDA). The flour products have not been knowingly or intentionally produced with genetic engineering. The flour products may have been cross contaminated in <i>de minimum</i> amounts by soybeans, corn, or other grain products that may be produced with genetic engineering. This would include EU non-approved GM traits that have been communicated in writing to Ardent Mills.
------	----------------------------------	----	--

Section 4. Process Facility and Equipment

	Item	Yes/No	Comments
4.1	Was the process equipment designed specifically for the job that it is currently being used for?	Yes	Standard for the milling industry.
4.2	Is the equipment made of suitable materials?	Yes	Direct food contact includes conveyors, sifters, and chutes that are comprised of steel, aluminum, stainless steel, wood, and nylon.
4.3	Is the equipment maintained in a good state of repair?	Yes	
4.4	Are scales and equipment used to measure or monitor process control parameters regularly calibrated?	Yes	Scales are calibrated at least annually.

Section 5. Process Controls

	Item	Yes/No	Comments
5.1	Are up-to-date recipes available and used by the persons who make the product?	Yes	
5.2	Are recipe or process changes communicated to those responsible for implementing?	Yes	Changes are communicated in operations meetings and documented.
5.3	Is there a hold and release program for finished product prior to shipping?	Yes	
5.4	Is there a record as to whether an ingredient was added to a product?	Yes	There is a record of all minor ingredients added to the product.
5.5	Is there a check that quantities added agree with those on the recipe?	Yes	All finished loads are checked for minor ingredients in correct quantities.
5.6	Is there any rework material used in the product?	Yes	When rework is allowed, it is product specific. SOPs and documentation are available for onsite review.
5.7	Is the product tested for microorganisms? If yes, which microorganisms?	Yes	There is an in-process monitoring program used as a guideline only. Products are tested by a third-party lab for indicator organisms. Raw flour products are not tested for pathogens and are intended for further processing.
5.8	Is there an environmental monitoring program? What action is taken in the event of a positive result?	Yes	The environmental monitoring program includes swabs in zones 2 and 3 for <i>Salmonella Spp.</i> and pathogenic <i>E. coli</i> STEC (Shiga toxin-producing <i>E. coli</i>). In the event of a positive result, vector swabbing occurs. Corrective action shall include no less than three (3) consecutive business days of follow up swabs that include the affected site and vector swabbing around the affected site. The corrective action cannot be closed out unless there are negative results.
5.9	Are products pasteurized or sterilized during the process?	No	As an exception, Ardent Mills offers a product for Ready to Eat applications: SafeGuard® flour, a validated heat treatment process with a minimum of a 4-log pathogen reduction.
5.10	Are key personnel trained specifically to do their job?	Yes	A documented program covers the training needs of relevant personnel. Records of all training is available.

5.11	Is there a hold policy?	Yes	The policy includes reporting suspect materials, identification, and isolation using hold tags, electronic holds, and disposition of held materials by authorized personnel.
5.12	Are loadout samples maintained for all deliveries?	Yes	
5.13	Describe the source(s) of water for the facility. (i.e., well, city, etc.)		City water (With the exception of Hastings and Martins Creek, which also have the ability to use well water)
5.14	Is water tested for physical, chemical, and microbiological contaminants on at least an annual basis?	Yes	A third-party lab is used to perform biannual water testing. Testing includes total coliform and <i>E. coli</i> . EPA drinking water standards for city water are reviewed at each facility annually. Well water is tested to EPA drinking water standards annually.
5.15	Is the facility capable of providing a certificate of analysis on shipments?	Yes	
5.16	Does the facility have a lot number identification system in place for in process and finished product identification?	Yes	For bulk orders, the Lot ID is unique to each load. This number allows for enhanced traceability and further quality control. The Lot ID number will match the BOL and Sales Order number. Direct shipment Bulk lot numbers for flour orders begin with the letters "SO" followed by an 11-character alpha-numeric number. Orders shipping through a Rail Truck Transfer (RTT) location will begin with the letters "TR" followed by an 11-character alpha-numeric number. Bagged product labels include a unique sequential lot code (6 or more digit number).

Section 6. Quality Assurance

	Item	Yes/No	Comments
6.1	Is there a QA department?	Yes	
6.2	Does the QA manager report to a manager independent of the production function?	No	On day-to-day functions, the QA manager reports to the plant manager, but also has an indirect report to the Regional Quality Director.
6.3	Are there any internal audits carried out?	Yes	All plants in which finished products for Ardent Mills are manufactured, including co-manufacturers, participate in an internal mill assessment at least once per fiscal year, or at a frequency agreed on between the audit team and platform quality or co-manufacturer quality.
6.4	Are internal auditors trained for their job?	Yes	Ardent Mills has criteria and processes for qualifying internal auditors.
6.5	Are quality results/non-conformances reviewed by the management?	Yes	A tracking database tracks items requiring follow-up, including items discussed during the local management review meetings. The process includes a tracking system to ensure decisions and actions were agreed to within the review process and communicated to appropriate staff.
6.6	Is authority for rejection of product clearly defined?	Yes	

Section 7. Product Protection and Foreign Bodies

	Item	Yes/No	Comments
7.1	Are all raw materials and dry ingredients sieved/sifted before use?	Yes	Grain passes through the cleaning house, where it moves through equipment designed to remove foreign material such as stones, dirt, and adventitious grains before being milled. All minor ingredients pass through the final product sifter before loading or packaging.
7.2	Are all silos/bins of raw materials sealed during storage?	Yes	All raw material bins are on the premises and the entry is secured.
7.3	Are any ingredients stored directly on the floor?	No	All materials shall be stored off the floor, on pallets, or in racks. All pallets shall have slip sheets between the pallet and the product. Slip sheets shall also be used between products when pallets are stacked. All stored items shall be placed at a minimum of 18 inches from all walls for cleaning, inspection, and insect/rodent control.
7.4	Are raw materials checked for contamination with previous cargos?	Yes	Contracts specify approved prior food grade commodities.
7.5	Is there a glass control and inventory system?	Yes	Glass policy is followed.
7.6	Are unique numbered seals or locks required to be intact and documented for all trailers/railcars for both inbound and outbound shipments?	Yes	
7.7	Do less than full truckload (LTL) shipments arrive sealed?	No	LTLs are locked.
7.8	Are seal numbers recorded on the bill of lading?	Yes	
7.9	Does the facility inspect and document transport vehicles for structural integrity, cleanliness, and overall suitability prior to loading and unloading of products?	Yes	
7.10	Are frozen and refrigerated ingredients kept stored at recommended temperatures?	N/A	Ingredients or finished products are not temperature sensitive.
7.11	Is the product inspected or sieved for foreign bodies at any stage of the process?	Yes	There are various sifters in place throughout the manufacturing process. There is a final sifter that all products pass through before being loaded into the final vessel.

7.12	Is there a final product sifter that all product is sifted through before packaging or loading?	Yes	Please refer to Table 1 under the Foreign Material and Preventative Control section.
7.13	Does the facility have a program to check for rejected materials (tailings/overs)? If so, at what frequency?	Yes	At the completion of bulk loading and every 2 hours +/- 30 minutes during a packaging run.
7.14	Does the facility maintain records of tailings (non-ingredient overs or thru's) findings and corrective action?	Yes	In an event of an unusual finding, an investigation is started to determine the source. The load out system is shut down and a supervisor is notified. Load from the last good check is put on hold and the final product sifter is opened and inspected for defects. This activity and any root cause and corrective action are documented on a food safety report.
7.15	Is the final product sifter inspected regularly for torn screens and other defects? If so, what is the frequency?	Yes	The final product sifter is inspected biweekly, at a minimum.
7.16	Is the problem of contamination by lubricants addressed?	Yes	All new maintenance lubricants must be approved using the Chemical Approval Process before purchase or use. A list of approved food grade and non-food grade maintenance lubricants is maintained, and an electronic software program maintains and collates current chemical SDSs. Food grade and non- food grade lubricants are labeled as such and are stored separately from one another to eliminate accidental misuse. All lubricants in or used on zone 1 must be food grade. However, non-food grade lubricants may be used for any area outside of zone 1. Chemical awareness training is provided to all personnel on an annual basis.
7.17	Is there a metal detector at or near the terminal end of the processing/load-out system?	Yes	Packed product lines have a metal detector.
7.18	How is the metal detector reject function tested?		To ensure the metal detector will reject bags back-to-back at the current speed of the line, the metal detector reject function test shall be performed a minimum of every 7 days and when adjustments are made to the metal detector. This test does not apply to packaging lines if the line stops when the metal detector goes off (Belt Stop).

7.19	What are the test piece sizes and compositions used for a metal detector check?		All metal detection devices shall be set up to detect a maximum test piece size of 2.64 mm Ferrous, 3.18 mm Non-Ferrous and 3.50 mm Stainless Steel.
7.20	How often is the metal detector checked for proper function (both sensitivity and rejection capability)?		At the beginning of shift, approximately every 2 hours during production run, and at the end of the run.
7.21	Are the results of the above check documented?	Yes	
7.22	Where is the test piece placed during the testing?		Test pieces shall be positioned as close to the center of the aperture as possible. Each test piece shall go through one time. Test pieces shall be randomly positioned on a different area of each of the test bags to test leading, middle, and trailing positions.
7.23	Describe what actions are taken if the metal detector rejects product during production.		If the metal detector rejects product, then an investigation is started to determine the cause. This activity and any root cause and corrective action are documented on a food safety report.
7.24	Is there a rare earth magnet located at or near the terminal end of the process/load-out system?	Yes	
7.25	How often is the terminal end magnet checked?		Daily.
7.26	Are the results of the checks documented?	Yes	
7.27	Describe management action if metal is found on the terminal rare earth magnet.		If an unusual finding is noted, an investigation is started to determine the source. This activity and any root cause and corrective action are documented on a food safety report.
7.28	Does the facility have air controls in place?	Yes	Compressed air is filtered.

Section 8. Cleaning and Housekeeping

	Item	Yes/No	Comments
8.1	Who is responsible for facility sanitation?		The department manager.
8.2	Are there documented cleaning instructions?	Yes	
8.3	Is there regular cleaning of processing equipment?	Yes	Master sanitation schedules define tasks, frequency, and responsible party.
8.4	Are contractors used for facility sanitation operations?	No	Regular cleaning is performed by the production team. If contractors are used, they are appropriately trained prior to starting work.
8.5	Are wooden cleaning utensils used (brushes, brooms, mops, etc.)?	Yes	All cleaning tools are color coded and used for specific cleaning surfaces or equipment. Where possible, wood is not used. During the monthly food protection audit, wood handled tools are inspected for condition and damage. If damaged, the tool is taken out of service.
8.6	Are bactericidal detergents used?	No	Dry cleaning methods are employed. This keeps water out of the environment.
8.7	Are cleaning chemicals separated from raw materials or products during use and storage?	Yes	Segregated and secure storage with restricted access to authorized personnel.
8.8	How is the effectiveness of cleaning checked?		The inspections include hygiene inspections to assess cleaning and housekeeping performance, as well as fabrication inspections to identify potential risks to the product from the building or equipment. SafeGuard cleaning effectiveness is checked via visual inspection and ATP swabbing.

Section 9. Personal Hygiene and Personnel

	Item	Yes/No	Comments
9.1	Does the company supply uniforms and are they used properly?	Yes	Company provides clean uniforms. All production personnel must wear their uniforms while at work.
9.2	How frequently are uniforms changed and washed?		Uniforms are changed every day or more if necessary. Uniforms are washed weekly.
9.3	Are uniforms washed internally or by an external company?		Uniforms are washed by an external service provider.
9.4	Are uniforms free from external pockets?	Yes	No pockets above the waist.
9.5	Is staff required to cover hair in the production areas?	Yes	Hairnets and beard nets are required in production areas of the facility that have open product (pack department) and when final product zones are open for inspection/repairs.
9.6	Is staff trained in basic hygiene requirements?	Yes	All employees go through annual GMP training. Training topics include product and material receiving, handling, and storage; employee hygiene and hygienic practices; control of employee illness and communicable disease; facility and equipment condition; and facility structure and grounds.
9.7	Is hand washing available in rest rooms and break rooms?	Yes	Employees are required to wash their hands after visiting the restroom and after breaks.
9.8	Are locker rooms provided for the staff?	Yes	
9.9	Are break rooms provided for the staff?	Yes	
9.10	Is smoking allowed inside the facility?	No	Smoking is only allowed in designated areas outside the facility > 50 feet away from the building.
9.11	Is eating allowed at the facility?	Yes	Eating/drinking is allowed in designated areas. Eating/drinking is not allowed in the production areas.
9.12	Is there a medical facility on premises?	No	
9.13	Is Personal Protection Equipment (PPE) available?	Yes	
9.14	Are there first aid boxes on premises?	Yes	
9.15	Are metal-detectable band-aids used to cover minor wounds?	Yes	Metal detectable band-aids.

9.16	Are staff required to report illness?	Yes	All employees, visitors, and contractors are provided training on the GMPs, which require employees to notify supervision of any relevant infection, disease, or condition with which they may have been in contact with or diagnosed with.
------	---------------------------------------	-----	---

Section 10. Laboratory and Product Development

	Item	Yes/No	Comments
10.1	Is there an on-site laboratory?	Yes	Moisture, ash, and protein are tested in on-site laboratories.
10.2	Has the on-site laboratory been approved by an accreditation body?	No	Good laboratory practices are followed, and an annual review is performed to verify that all procedures and policies are in place.
10.3	Is the laboratory equipment regularly serviced and calibrated?	Yes	
10.4	Is there a crosscheck program in place to monitor the performance and accuracy of the labs?	Yes	Each mill participates in an external crosscheck program with the American Association of Cereal Chemists (AACC). Internal crosschecks at the facility and company-wide level are performed on a scheduled basis.
10.5	Are microbiological analyses performed at the on-site laboratory?	No	
10.6	Is there a manual of standard methods for laboratory procedures?	Yes	Laboratory procedures are AACC methods or standardized internal methods.
10.7	Does the laboratory management regularly review the results of tests?	Yes	All deviating in-process quality trends are discussed in the daily production and QA meetings.
10.8	How are newly developed products transferred correctly into production?		The management of change process is used for new products and for changes to existing products.
10.9	Are external laboratories used?	Yes	
10.10	Are external laboratories approved by an accreditation body?	Yes	Accreditation to ISO/IEC 17025.
10.11	Which analyses are performed by the external labs?		Microbiological, chemical, physical, and environmental analyses.

Section 11. Pest Control and Waste Management

	Item	Yes/No	Comments
11.1	Is there internal pest control or a contract with an external company?	Yes	An external licensed pest control operator (PCO) is used for pest management.
11.2	Are records kept of routine pest control and findings?	Yes	
11.3	Are recommendations made in the reports acted upon by the company and/or the contractor?	Yes	Reports are reviewed weekly. Any non-compliance of requirements noted shall be corrected within the established time frame determined by the location.
11.4	Is there an up-to-date plan of all the baits on site?	Yes	
11.5	Is there an up-to-date list of all rodenticides used on site?	Yes	
11.6	Are production areas equipped with electric flying insect monitors?		Not required, some facilities use UV light models.
11.7	How often are the electric fly killers examined and maintained?		If used, they are checked and/or cleaned per the service agreement with the PCO.
11.8	Does the facility use non-poisonous rodent traps inside?	Yes	
11.9	How often are the traps inspected?		Weekly.
11.10	Are bait stations located outside the facility?	Yes	
11.11	How often are the exterior bait stations inspected?		Biweekly.
11.12	Is there a licensed or trained pest control operator at the facility?		This is facility-dependent.
11.13	Are any chemicals/pesticides stored at the facility? If yes, please describe.		This is facility dependent. If stored, the chemical control policy outlines requirements. All are stored/used in accordance with applicable regulations.
11.14	Is the ingredient or any of its components chemically treated, such as fumigation (fungicide, insecticide or pesticide) or irradiation?	No	Irradiation is not used. Flour transported by rail may be fumigated seasonally based on customer request. On very rare occasions, grain may be fumigated.
11.15	Does the PCO conduct an annual assessment of the facility?	Yes	This is completed as part of the Integrated Pest Management (IPM) program.
11.16	Are the assessment results and corrective actions documented and used to develop the IPM program?	Yes	Reports are assessed every quarter for trending, which includes catch analysis. All corrective actions and preventive measures resulting from findings are documented.

11.17	Does the facility use pheromone monitoring devices? At what frequency are they examined?		If used, they are checked and/or cleaned at least biweekly. Pheromones are replaced every 4-6 weeks and food oil replenished no less than monthly.
11.18	What types of measures does the facility use to control aviary populations?		This is facility dependent. Bird populations are controlled first by exclusion (roosting deterrents, netting, screening, etc.). Some facilities use USDA APHIS Wildlife Services to manage birds. Any chemicals used must be outside, in accordance with label instructions, and pre-approved by the corporate leadership team.
11.19	Does the facility have a chemical control program in place that addresses all chemicals used in the facility?	Yes	There is a formal approval process. Before any new chemical is purchased, a request is made in the system to the food safety and EHS teams, who evaluate the need and if the chemical meets the safety requirements.
11.20	Is there a procedure in place for waste disposal monitoring? Please detail the types of waste control methods used.	Yes	Waste is effectively, efficiently, and regularly removed from the premises and the surrounding areas to ensure a hygienic operation of the premises. Dry waste- adequate provisions are made for the disposal of all solid processing waste. When waste is being held on the premises prior to disposal, it is held in a manner that precludes pests and vermin and is located away from immediate openings into food processing and handling areas. Hazardous waste is held on the premises prior to disposal in a designated storage area. Hazardous waste stored on the premises follows all applicable state and federal standards. A disposal truck is called when a full load is ready to ship to the TSDF (Treatment, Storage and Disposal Facility). All waste disposals must meet local, state and federal guidelines.
11.21	Are the waste containers kept in a specific area away from the main production areas?	Yes	
11.22	Are the containers lidded and kept closed?	Yes	

Section 12. Policies and Procedures

	Item	Yes/No	Comments
12.1	Does the company have written food safety and quality policies?	Yes	
12.2	Are employees aware of the policies?	Yes	Ardent Mills is committed to creating a culture that focuses on and improves the overall food safety and quality culture. All Ardent Mills team members are given the opportunity to participate and give feedback in a survey focused on food safety and quality. The survey will be conducted at least every two years. Corporate will review all results and share the findings with the business. Based on the responses, each location is responsible for developing and implementing an action plan to improve the quality and food safety culture.
12.3	Does the company have a documented and tested product trace recall or withdrawal system for raw materials and products? If Yes, how often is the program audited?	Yes	<p>Ardent Mills' facilities are responsible for performing mock traces at a minimum of four times per year or at a frequency determined by an individual facility and Director of Food Safety and Quality. The types of mock traces listed below will be rotated so that every two years, one of each will have been conducted:</p> <ul style="list-style-type: none"> • Forward trace – grain to finished ingredient (i.e., grain to flour, primary packaging to finished product, or ingredient to finished product) • Backward trace – finished ingredient to grain (i.e., flour to grain, sales order to raw material, feed order to grain) • Micro Ingredient • Rework • Packaging Material – only applicable to those facilities who bag product <p>The mock trace will be deemed successful if completed within 4 hours.</p>
12.4	Are customer complaints recorded and analyzed for trends?	Yes	All complaints are entered into an electronic database to be tracked. The work stream team performs a root cause analysis, such as a 5-Why, to determine effects and recommend corrective and preventive actions.

12.5	What constitutes the closure of a complaint?		A work stream team is assembled and meets to implement the corrective and preventative actions and that follow-ups occur within the time frame determined by the team.
12.6	Are all complaints formally responded?	Yes	Complaints are responded to in a timely manner depending on the severity and nature of complaint.
12.7	Does the facility have a documented policy for handling regulatory visits and requests for information?	Yes	
12.8	Does Ardent Mills support the goals of the California Transparency in Supply Chains Act?	Yes	Please see our statement on the California Transparency in Supply Chains Act.

Section 13. Food Safety

	Item	Yes/No	Comments
13.1	Does the facility operate a formally documented food safety plan? If yes, has the food safety plan been approved by an accreditation body?	Yes	The food safety plan is in compliance with FSMA requirements. Plans and programs are available for review during a visit when a food safety NDA is in place. The food safety plan is audited by a Global Food Safety Initiative recognized scheme (BRC) annually.
13.2	Is the food safety system audited?	Yes	Each facility is audited by a third-party to a Global Food Safety Initiative recognized scheme (BRC) annually. Co-manufacturing plants in which finished products for Ardent Mills are manufactured participate in an internal food safety audit at a frequency agreed on between the audit team and co-manufacturer quality. Ardent Mills facilities conduct an internal food safety audit on a regular basis in compliance with facility procedures.
13.3	Do your products require a microbiological preventative control?	Yes	Ardent Mills does not process our food ingredients made from raw agricultural products to control pathogens such as <i>Salmonella</i> sp., pathogenic <i>E. coli</i> and/or <i>Listeria monocytogenes</i> . These ingredients are intended to be further processed to significantly minimize or prevent the risk of pathogens. This preventative control is often accomplished with lethality steps such as baking, cooking, frying or boiling. The exception to this is our SafeGuard® products which have a CCP for heat treatment. Ardent Mills validated heat treatment process has up to a 5-log reduction for SafeGuard® flour.
13.4	Do your products require a preventative control for chemical hazards?	No	The primary mycotoxin issue in wheat is from Deoxynivalenol (DON), also known as vomitoxin. Each year, we review information from our sampling program across growing regions to survey conditions and results on wheat. We monitor areas of concern where DON may be present in the incoming wheat. Procedures are conducted to follow up from grading results on incoming wheat. Testing of wheat and flour are conducted, as warranted, to monitor levels of DON to the FDA advisory guidelines below 1 ppm for flour.

13.5	Do your products require a foreign material preventative control?	Yes	Please refer to Table 1 under the Foreign Material and Preventative Control section.
13.6	Have CCPs been identified?	No	Based on a risk assessment, a determination was made that our plan does not require a CCP. The exception to this is our SafeGuard® products which have CCP's.
13.7	Is there a program in place that assures heavy metal residue is in conformance with the US government regulations?	Yes	Heavy metal testing is performed on a variety of wheat classes (e.g., durum, HRS, HRW, etc.). There is no testing performed on finished product. Heavy metal residue is evaluated as very low risk. All results have been reported below 1 ppm and do not provide risk based on FDA guidance documents or regulations. Please note that all products do not have limits established.

Section 14. Feed Safety

	Item	Yes/No	Comments
14.1	Does the feed product meet the definition of FDA regulation 21 CFR 589.2000: Restricted Use of Prohibited Protein?	Yes	Mammalian protein products are not knowingly handled at Ardent Mills facilities where the products supplied to the buyer are produced and/or shipped.
14.2	Does the feed product meet the definition of FDA regulation 21 CFR 589.2001: Cattle Material Prohibited from Animal Feed?	Yes	Cattle material prohibited in animal feed is not knowingly handled at Ardent Mills facilities where the products supplied to the buyer are produced and/or shipped.
14.3	Does the facility receive, process, or store any medication, including medicated premixes or feeds?	No	
14.4	Are van trailer carriers prohibited from transporting fertilizer, pesticides, herbicides, or any other non-feed grade chemicals in the same vehicles or a previous load?	Yes	Feed products do not get transported via van trailers.
14.5	Are bulk carriers prohibited from transporting fertilizer, pesticides, herbicides, or any other non-feed grade in a previous load without applicable wash?	Yes	A trailer that has hauled any non-feed grade products as the last previous load will require a conversion wash prior to delivering to Ardent Mills or transporting Ardent Mills products.
14.6	Are DON levels less than or equal to 5 ppm?	Yes	
14.7	Do ingredients meet applicable AAFCO definitions?	Yes	Ingredients are listed in order of predominance by weight, on an 'as formulated' basis. The ingredients are approved food additives in 21 CFR 573, or considered GRAS (Generally Recognized as Safe) animal feed additives.
14.8	Does the food safety plan identify hazards in the product that are sold without controlling for the identified hazards?	Yes	Ardent Mills does not process our food or feed ingredients made from raw agricultural products to control pathogens. These ingredients are intended to be further processed to significantly minimize or prevent the risk of pathogens. This is often accomplished with a lethality step such as baking, cooking, frying or boiling. Foodborne microbial pathogens that have been noted by our hazard analysis for flour as an ingredient include <i>Salmonella</i> or pathogenic <i>E. coli</i> .

Section 15. Environment, Health, and Safety

	Item	Yes/No	Comments
15.1	Has an environmental program been established? If yes, has the program been officially certified?	Yes	Ardent Mills environmental programs are established and in compliance based on local, state, and federal requirements. Ardent Mills facilities are audited by local, state, and federal agencies.
15.2	Has the environmental program been documented?	Yes	All permit required documentation has been identified and properly maintained.
15.3	Are measures taken to prevent spills?	Yes	Facility inspections and procedures, secondary containment, and facility permits are followed to ensure spills are prevented and, if needed, handled quickly and appropriately.
15.4	Is there a policy to minimize waste products?	Yes	The flour milling process makes use of all material in the process. This allows for 100% of the raw material to be shipped out as flour, germ, bran, and feed.
15.5	What are the emissions to air?		The controlled particulate matter emissions are calculated based on the US Environmental Protection Agency rules and permitted accordingly. Each facility maintains the appropriate documentation to ensure compliance with permitted particulate matter emissions.
15.6	What are the emissions to water?		The flour milling process does not produce wastewater. If a facility uses water in the grain tempering process, it is absorbed into the grain prior to milling. There is no excess water in the tempering process.
15.7	Is the wastewater treated?	N/A	Ardent Mills flour facilities do not generate wastewater except for restroom and break rooms, which are properly handled by local sewer systems.
15.8	Is the quality of the wastewater monitored?	N/A	Ardent Mills flour facilities do not generate wastewater except for restroom and break rooms, which are properly handled by local sewer systems.
15.9	Does the facility record key environmental parameters?	Yes	Ardent Mills follows all local, state, and federal permits and guidelines.

Section 16. Food Allergens

	Item	Yes/No	Comments
16.1	Does the company have a written allergen control program that addresses allergens?	Yes	Of the Big Nine, wheat is the only allergen on-site and all products contain or may contain wheat. Raw material ingredient statements are reviewed upon receipt to confirm that there are no allergens other than wheat. As part of the raw material supplier approval process, suppliers are required to notify us of any changes to their product, line or in plant allergens.
16.2	Are any of the following allergens or sensitivities used or stored in the facility: <ul style="list-style-type: none"> • Eggs • Dairy • Tree nuts • Peanuts • Soy • Crustacean • Fish • Wheat • Sesame • Gluten (Wheat, Rye, Barley, Kamut, Triticale) 	Yes	Wheat is processed and stored in all facilities. Some facilities also store rye and barley.
16.3	Does the facility have dedicated systems for products containing allergens?	No	Wheat is the only allergen on-site and all products contain or may contain wheat.
16.4	Does the facility use separate scheduling and sanitation as its management strategy for allergen containing products?	No	Wheat is the only allergen on-site and all products contain or may contain wheat.
16.5	If production lines are not dedicated, briefly describe the allergen clean-out program to prevent changeover cross contamination.	N/A	Wheat is the only allergen on-site and all products contain or may contain wheat.
16.6	Has the allergen-cleaning program been validated for effectiveness (e.g. residue analysis)?	N/A	Wheat is the only allergen on-site and all products contain or may contain wheat.
16.7	Does the facility have documented allergen cleaning procedures that explain how to clean equipment and visually inspect for cleanliness?	N/A	Wheat is the only allergen on-site and all products contain or may contain wheat.
16.8	Is dual sign-off required by operations and quality on allergen cleaning documentation?	N/A	Wheat is the only allergen on-site and all products contain or may contain wheat.

16.9	Does the company provide employees with training on allergens and cross-contamination?	Yes	Employees receive allergen training that covers cross-contamination. Incoming goods are checked for allergens and supplier specifications do not identify any additional allergens other than wheat.
------	--	-----	--

Section 17. Sustainability

	Item	Yes/No	Comments
17.1	Does Ardent track greenhouse emissions intensity for manufacturing?	Yes	Our greenhouse gas emission intensity CO ₂ per bushel is 8.72 kg.
17.2	Do you know what the nitrogen use intensity and phosphorus surplus associated with the fertilizer application on the fields where your grain was produced?	Yes	For 3% of our purchased grain, our nitrogen use intensity is 2.29 lbs. N/ bu for Spring Wheat and 1.38 lbs. N/ bu for Winter Wheat. Phosphorus surplus was .91 lbs. P ₂ O ₅ /bu for Spring Wheat and .56 P ₂ O ₅ for Winter Wheat. We are unable to determine these for the large majority of purchased grain.
17.3	Is the sales paper bag packaging used for our final product post-consumer recycled material and sustainably-sourced renewable virgin material?	Yes	100% of the sales paper bag packaging is sustainable sourced renewable virgin material. (FSC Certified).
17.4	Do your logistic providers (carriers) report annual greenhouse gas emissions associated with transportation?	Yes	30.33% of our product, by mass, was shipped to retail or distribution centers by carriers who reported their GHG emissions associated with transportation.
17.5	What percentage of your grain supply, by mass, has been determined to be grown on fields that are low risk for conversion to non-forest use?		100% of our grain supply is grown on fields that have been determined to be low risk for conversion to non-forest use.
17.6	What percentage of your grain supply has been determined to be grown on fields that have had zero conversion of High Conservation Value (HCV) forests and High Carbon Stock (HCS) forests since 2010?		100% of our grain supply has been determined to be grown on fields that have had zero conversion of HCV and HCS forests since 2010.
17.7	What percentage of your grain supply is grown on fields with zero deforestation since 2010 and zero conversion of HCV and HCS non-forest lands since 2010?		It has been determined that 100% is grown on fields with zero deforestation.
17.8	What was the average yield of your grain supply from farming operations?		2.56 metric tons of grain supply harvested per hectare planted. 100% of our grain supply, by mass, is represented by the number reported above. 3.1 metric tons of grain supply harvested per hectare. 100% of our grain supply, by mass, is represented by the number reported above.

17.9	What was the irrigation water use intensity associated with the farming operations that produced your grain supply?		We are unable to determine at this time. For 3% of purchased grain the irrigation water use for Spring Wheat was 6617 gallons/bu, and 5822 gallons/bu for winter wheat. For the rest of the grain supply we are unable to determine.
17.10	How much soil erosion was associated with the farming operations that produced your grain supply?		For 3% of purchased grain the soil erosion associated with Spring wheat was 1.16 tons/acre/year and for Winter wheat- .84 tons/acre/year. For the rest of the grain supply we are unable to determine.
17.11	What percentage of the sales packaging for your final products, by mass, was recyclable and/or was formally assessed for material and process efficiency and weight or volume optimization, and for which quantified environmental impact reduction can be demonstrated?		100% of sales packaging is recyclable.

Section 18. Regulations

	Item	Yes/No	Comments
18.1	What is the percentage of known origin of your grain supply?		90% of our grain supply, by mass, was traced to the region of origin. 10% of our grain supply, by mass, was traced to the farm of origin.
18.2	Do you know the country of origin on the micro ingredients?	Yes	All micro ingredients are sourced, processed or manufactured in the United States, however, the ingredients may be comprised of components from countries outside of the United States.
18.3	Do you use foreign suppliers?	Yes	Ardent Mills is in full compliance with the Foreign Supplier Verification Program (FSVP) regulation, CFR 21 Parts 1, 11, and 111.
18.4	Do you use GMO ingredients?	No	There are currently no GMO wheat, rye, durum, or barley varieties for sale or in commercial production in the United States as per United States Department of Agriculture (USDA). The flour products have not been knowingly or intentionally produced with genetic engineering and have not been knowingly or intentionally commingled with food that may have been produced with genetic engineering. The flour products may have been cross contaminated in <i>de minimum</i> amounts by soybeans, corn, or other grain products that may be produced with genetic engineering. This would include EU nonapproved GM traits that have been communicated in writing to Ardent Mills.
18.5	Are any Ardent Mills products Non-GMO Project verified?	Yes	You can find a list of the certified products on the Non-GMO Project Verified website: https://www.nongmoproject.org/find-non-gmo/
18.6	Does Ardent Mills support natural claims for flour?	No	Ardent Mills' products are produced by milling or cleaning to the desired state (physical processing). As of the date of this letter, the FDA has not defined claims for Natural.

18.7	Does Ardent Mills support vegan/vegetarian claims for flour?	No	<p>The Federal Food and Drug Administration has not defined the terms vegetarian or vegan. Products supplied to you from Ardent Mills, LLC have not been manufactured with animal or animal by products. Additionally, no Ardent Mills product have been tested on animals by Ardent Mills or at the direction of Ardent Mills.</p> <p>If a product is identified as “vegan” at Ardent Mills, we define “vegan” products as those products that:</p> <ul style="list-style-type: none"> - do not contain animal or animal by-products, and - have not been tested on animals by Ardent Mills or at the direction of Ardent Mills. <p>Unless a product is specifically designated as “vegan”, Ardent Mills does not make or support vegetarian or vegan claims. Any “vegan” or “vegetarian” claims are the responsibility of the customer.</p>
18.8	Are Ardent Mills products certified halal? Do Ardent Mills products meet halal criteria?	No/Yes	<p>Flour products have met the Halal criteria but are not certified. Our products do not contain alcohol, natural L-Cysteine extracted from hair or feathers, animal fats and/or extracts, bloods of any origin, blood plasma, gelatin, pork or pork derivatives and/or other animal meat or derivatives such as beef, chicken, deer, or mutton, and we do not use or add alcohol during the manufacturing process.</p>
18.9	Does the product require a Prop 65 warning label?	No	
18.10	Do you perform pesticide testing on raw grain? If so, what analyses are run?	Yes	<p>Pesticide residue is considered low risk. Pesticide testing is performed on a variety of raw grains. There is no testing performed on finished product.</p>
18.11	Does the facility have a Preventative Controls Qualified Individual in place?	Yes	<p>Individuals may be internally qualified or PCQI- FSPCA trained.</p>

18.12	Does Ardent Mills' enriched flour meet the Standards of Identity for US and Canada?	Yes	<p>Components and levels of enrichment are identical for Canada and the U.S. These meet the regulations of respective countries.</p> <p>US per pound (Reference: 137.165 (a))</p> <ul style="list-style-type: none"> • 2.9 mg thiamine • 1.9 mg of riboflavin • 24 mg of niacin • 0.7 mg of folic acid • 20 mg of iron <p>Canada per 100g (Reference: B.13.001):</p> <ul style="list-style-type: none"> • 0.64 milligrams of thiamine • 0.40 mg of riboflavin • 5.30 mg of niacin or niacinamide • 0.15 mg of folic acid, and • 4.4 milligrams of iron
-------	---	-----	--