

July 2024

Re: Preventative Action Plan and Control Measures to Avoid Pests

Ardent Mills proactively takes many steps to avoid pest contamination in the products supplied to customers. The details of our programs and controls for specific areas are listed below. Please note that not all bullet points may be applicable for our Pulses facilities in Pullman and Steptoe or our Yuba City facility as they produce grains/legumes, not flour.

1. Pest Control

- Each Ardent Mills facility engages a licensed Pest Control Operator (PCO).
- Every location incorporates proactive measures known as Integrated Pest Management to prevent the harborage and occurrence of insects and pests.
- All openings (doors, windows, loading docks, etc.) shall be rodent and insect proof.
- Pipes, conduits, vents, etc. that penetrate the outside walls or roofs shall be fitted with collars, gaskets, or seals that prevent pest entry.

2. Cleaning and Housekeeping

- Every location follows a Master Sanitation Schedule in the facility, which includes opening equipment, blowing it out or taking it apart to access dead spots, and looking for insect harborages.
- All storage and load out bins are inspected on a set frequency and cleaned as needed.
- Trash in all areas of the plant is kept at a minimum and is frequently removed.
- Stored equipment is cleaned before going into storage and kept orderly.

3. Storage and Handling Practices

- All packing materials, micro ingredients, and finished products shall be stored in designated areas.
- All stored items shall be placed a minimum of 18 inches from all walls.
- All materials shall be stored off the floor on pallets or in racks.
- Torn or damaged material shall be removed from storage the same day damage occurs.
- All packing materials, micro ingredients, and finished products shall be rotated on a first-in/first-out basis.

4. Environment Control

- Quality Managers and other trained employees conduct a Food Protection Audit every 30 days to assess overall conditions of the plant. All findings are noted and corrected after the audit.

5. Premises Inspection

- Every Ardent Mills facility is serviced weekly by a PCO.
- All employees are instructed to fill out a pest and rodent sighting log and report findings to a supervisor when sightings are observed/found at the facility.
- All evidence of pests inside or outside the building shall be removed immediately.
- If a trend is noted, additional inspections may be conducted by appropriate leadership personnel.

6. Fumigation or Fogging
 - All pesticides and chemicals related to pest management are approved by corporate before use.
 - All pesticide applications are recorded in the Pesticide Usage Log.
 - General fumigations and/or fogging will be done as needed. This will be determined by plant management and other appropriate leadership personnel.
7. Holding Period of Ingredients
 - All packing materials, micro ingredients, and finished products shall be rotated on a first-in/first-out basis.
 - Ingredients that are past their shelf life shall be properly disposed.
8. Checking of Flour Tailings
 - Final Product Sifter tailings are inspected after each load.
9. Equipment Silos and Bulk Tanker Cleaning
 - All storage and load out bins are inspected on a set frequency and cleaned as needed.
 - Bulk flour trailers are inspected before every load and are washed at a minimum of every 28 days.
10. Inspection and Testing
 - Sifter tailings are inspected after the load of flour has passed through the final product sifter and before release of the product for shipment.
 - Every load of flour is tested to ensure the product meets all analytical customer requirements before a Certificate of Analysis is generated and the flour is released for shipment.

Corrective Action initiated when abnormal Pest Issues are detected

When a customer complaint occurs, the appropriate leadership personnel is notified. The root cause and corrective action process begins immediately to identify the source of the issue and correct the issue in a timely manner. Once a source is identified, the customer is notified of the findings.

Sincerely,

Ardent Mills Food Safety & Quality Team

AMQualityRequest@ArdentMills.com