

## MILLBO S.r.l.

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## ALLERGEN POLICY

MILLBO SRL ensures that allergenic materials are effectively managed through risk assessment and that the possibility of cross-contamination with allergens is minimised or absent.

MILLBO SRL manages allergen issues by the following means:

- investigation of raw materials and ingredients through the supplier's quality assurance process;
- consideration of the potential for cross-contamination in the production process through risk assessment, HACCP studies and implementation of controls;
- storage of allergenic materials in identified and separate storage areas;
- physical and spatial separation of the raw material storage, packaging, and finished product storage processes;
- use of personal protective equipment to minimise the risk of accidental contamination;
- training and formation for staff members, visitors, and contractors on the correct management of rest breaks and the consumption of food introduced from outside, through the use of dedicated areas.

The company also continuously monitors possible new information and changes in legislation in order to be able to update company practices and procedures as necessary and in a timely manner.

The following listed ingredients are allergens used by MILLBO SRL.

### GLUTEN

Cereals containing gluten (wheat, rye, barley, oats and spelt) account for a large portion of MILLBO SRL's raw materials, intermediates and finished products.

MILLBO SRL, in line with Implementing Regulation (EU) No. 828/2014 OF THE COMMISSION of 30 July 2014 and in line with Regulation (EU) No. 1169/2011 on the requirements concerning consumer information on the absence of gluten or its presence to a reduced extent in food and regulating the obligation to declare the presence of allergens in consumer information, declares that for the absence of gluten or its presence to a reduced extent in food, it will follow the following ALLERGEN POLICY:

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- **GLUTEN-FREE:**  
The term 'gluten-free' is only permitted where the gluten content of the food does not exceed 20 mg/kg;
- **WITH VERY LOW GLUTEN CONTENT:**  
The term 'very low gluten' is only permitted where the gluten content of the food, consisting of one or more ingredients made from wheat, rye, barley, oats or cross varieties thereof, specially processed to reduce the gluten content, or containing one or more such ingredients, does not exceed 100 mg/kg;
- **ADDITIONAL REQUIREMENTS for foods containing oats:**  
The oats contained in a food presented as "gluten-free" or "very low gluten" must have been specially produced, prepared and/or processed to avoid contamination by wheat, rye, barley or their crossbred varieties and its gluten content must also not exceed 20 mg/kg.

Raw materials, semi-finished products and products that are defined as gluten-free by MILLBO SRL are stored and processed in a production and storage area that is separate from the rest of the company areas. This area is located in a warehouse that is completely separate from the rest of the production complex with separate access. To access this area, personnel and visitors are required to comply with specific hygiene and behavioural regulations and to wear dedicated protective clothing. The equipment and facilities are different for the areas dedicated to gluten and gluten-free products. According to the company's analysis plan, checks are carried out for the absence of the gluten allergen in raw materials and finished products that are indicated as gluten-free.

### SOY

The soy, used as a raw material, is stored in the warehouses of the first and third buildings. This raw material can be used both in the horizontal mixer for the production of semi-finished products and in the NAUTA mixing system.

MILLBO SRL follows and complies with Regulation (EU) No. 1169/2011, which regulates the obligation to declare the presence of allergens in consumer information. Based on this, it was decided to also consider the issue of the possible presence of traces of soya in flours.

Because if, for example, soy plants are grown before wheat, individual soy seeds can contaminate wheat. This accidental contamination is not intended by farmers and cannot be completely avoided. Furthermore, raw materials of the agricultural crop are often combined with others during harvest, transport and storage with shared equipment and facilities.

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Regardless of MILLBO SRL's specific distinctions in the production and handling of raw materials, we therefore include the indication 'possible cross-contamination' for all products originating from raw materials containing wheat flour.

For raw materials and finished products stored and processed in the gluten-free department, the possibility of soy cross-contamination is ruled out as it has been assessed that these products are not subject to this problem.

**MUSTARD**

Currently, mustard has also been considered by MILLBO SRL as a potential field contamination. MILLBO SRL does not present the allergen either in the factory or in the supply chain, but based on communication from suppliers, MILLBO SRL has decided to declare the risk of mustard cross-contamination for products containing wheat flour.

For raw materials and finished products stored and processed in the gluten-free department, the possibility of mustard cross-contamination is ruled out as it has been assessed that these products are not subject to this problem.

**13/01/2026****Millbo S.r.l.**



