

COMPANY POLICY 2024/25

Sacchetto S.p.A. management, aware that **Quality** mostly means customer satisfaction, constantly pursues the aim of internally improving the quality and food safety management system, with the aim of giving ever increasing guarantees of the reliability of the company and on the constancy of the qualitative characteristics of the products supplied.

The current Company Certificates are:

- Management system regarding Quality in compliance with **UNI EN ISO 9001:2015**;
- IFS;
- KOSHER
- HALAL;
- Organic product in compliance with EU BIO and JAS;
- GMP+;
- VEGAN;
- ISO 27001;
- AEO.

Parallel to quality principles, the Board of Directors has decided to commit in continuous improvement on safety management and work place health, environmental sustainability, information management and import export operations.

For this reason, they decided to implement their own system according to the **ISO 27001, ISO 45001, ISO 14001** standards and specific regulations to become Authorized economic operator (AEO) and they have the goal of obtaining certification according to these standards in the coming years. The adoption of the occupational and environmental health and safety management system represents a strategic decision of the management of Sacchetto Spa.

Certain on the fact that continuous improvement depends on each functional area and department's effort and involvement, the Board gave technical, economical and human resources at the disposal of the company in order to guarantee continuous improvement. Meant for:

- Continuous **development** so to **INCREASE PRODUCTION** and **QUALITY** of specific products.
- Continuous **INFORMATIC development** so to improve each Company area's functionalities, as well as to increase the entire **Company IT Defense System**.
- Continuous **RESEARCH & DEVELOPMENT** so to possibly create new products (E.g. **WHEAT GLUCOSE SYRUP**).
- Continuous **RESEARCH & STRENGTHENING** into new extra UE markets (**USA, ASIA and OCEANIA**).
- Continuous development in **Company process automatization**, leading the business into a **technology and digital transformation**.
- Continuous technology development in self-production of thermic and electric energy, in order to increase efficiency and reduce emissions. All this respecting the Company Mission, into the never-ending research so to limit environment impact with ecofriendly production cycle.

The Board is committed through several tools, including Management Re-Evaluation, in defining targets and strategies, documented and declared so to guarantee that the Company Policy is well understood, effected and supported from each functional area.

Sacchetto S.p.A. establishes the following final targets:

- To **reduce** percentage on **product non conformity**;
- To **reduce** customers **claims**;
- To **maintain** the current **Certificates**.

The Quality Manager has full responsibility and authority to ensure the respect what states above, but he relates directly to the President and Vice President regarding quality issues that he cannot solve on his own through the expected management structure.

The Board commits to subscribe what declared in the Company Policy 2023-24 and so to publish at any employees. Furthermore, the Board commits to demonstrate the correct application of what declared on this document, through the maintenance of company Certifications by means of accredited authorities.

Below all the fundamental targets of Sacchetto S.p.A. Management System, divided per interest area:

ETHICAL POLICY

"The personnel" is who produces and generates company goods: Sacchetto S.p.A "mission" has always been focused on manufacturing **products** being not only of **high quality, healthy and safe**, but also results of **company lifestyle** constantly aimed **on ethics consciousness and solidarity**.

Requirements adopted towards employees, are related on four areas: **Human rights, Worker rights, Child Exploitation Safeguard and Healthiness of working place**.

Company's future depends as well on maintaining a correct and honest Company Image and Identity toward all people and organisations that interact with it and Sacchetto S.p.A. means to obtain this target through an **honest conduct, respecting the requirements of the other, on the top of respecting current legislation**. The company personnel, in addition to law application, must operate in respect of ethics principle and propriety. Therefore, the company commits:

- ✓ Not to exploit and least of all take advantage of, child work;
- ✓ Guarantee the possibility to educational opportunities, to all workers who intend to achieve educational qualification;
- ✓ Not to practise forced labour;
- ✓ To apply all safety standards so to always safeguard workers health;
- ✓ To constantly evaluate safety level of installed plants, and as precautionary action, evaluate all future project even during planning phase;
- ✓ To guarantee the maximum safety level during working activities, from hygienic perspective too, in order to safeguard its own employees' safety as primary asset and to foster the best working conditions in the job place;
- ✓ To periodically evaluate health conditions of all employees;
- ✓ To guarantee any freedom of association and collective bargaining;
- ✓ Not to practice discriminations of any kind;
- ✓ To unequivocally guarantee that no form of oppression will be tolerated during working activities;
- ✓ To give immediate help to any worker subjected to any form of oppression on the working place;
- ✓ To execute, when necessary, disciplinary practices in full respect of the individual and the current legislation;
- ✓ To guarantee the respect of work timetable defined by the job contract;
- ✓ To guarantee that salaries include, on the top of retribution condition based on current legislation, capacities as well, in case contractual minimums do not give guarantees of conducting a dignified life;
- ✓ To guarantee the respect and conformity to any applicable legislation/regulation, to any potential undersigned commitment and to any international ethics norms relevant on this matter;
- ✓ Not to allow any form of corruption towards customers, suppliers or any subjects that can influence company activities;
- ✓ To conserve an integrity and full transparency imagine in working behaviours;
- ✓ To guarantee that any Company member will act in full Company interest, avoiding actions that can cause conflicts with the interest of the latter;
- ✓ To support any Company member in maintaining an ethically correct and honest work behaviour, to the benefit of the Company interest and its own customers.

The **Ethical Policy** concerns **all Company personnel**, at any level, **both internal and external collaborators**, as much as **sales personnel and suppliers**. Therefore, this policy is communicated to the whole Company personnel (board included), to external companies' personnel and to the suppliers, then made publicly available to all the authorities that interact with the Company or to who is asking for it.

HEALTH AND SAFETY POLICY

"Health and safety in the workplace is everyone commitment, which manifests itself not only in respecting safe and correct behavior in carrying out your own job, but also in constantly creating the most suitable conditions for this to happen."

The Company Safety Management System has been implemented in accordance with current legislation and considering the risk nature and entity of the activities, as well as the specificity of the organizational structure.

The general Sacchetto Work Safety Management System targets, can be summed up into research and commitment in order to:

- ✓ Maintain a work standard that complies with legal requirements relating to health and safety in the workplace (Legislative Decree 81/08 and subsequent amendments).
- ✓ Implement a monitor & evaluate system of mandatory requirements to facilitate identification and legislative compliance.
- ✓ Reduce and eliminate potential accidents and illnesses deriving from work activities.
- ✓ Reduce potential and actual injury causes through corrective and preventive actions.
- ✓ Manage changes during the preventive phase.

The aforementioned strategic guidelines constitute commitments of general nature, translated into operational objectives of a quantitative and monitorable nature as part of an annual improvement plan. This strategy constitutes the structural reference framework for the formulation and review of the objectives themselves.

For this purpose, the Company Board undertakes to comply with the currently applicable legislation on the subject of Health and Safety at work and to its continuous updating. This effort will be pursued with all the necessary human, material, financial and instrumental resources available.

The Safety Policy and the objectives framework are communicated within Sacchetto S.p.A. to all employees through billposting and / or meetings involving all staff. The task is that on this way everyone is informed and the contents are understood and supported at all levels. Everyone is called to collaborate to make the Safety Policy active, understandable and improvable, each with their own skills and abilities.

Systematic reviews from the management defined annually, make possible to establish whether:

- the objectives have been achieved and whether they remain appropriate to accomplish the defined objectives;
- the pursuit of continuous improvement in all company activities is effectively implemented;
- the information at the relevant levels of the organization is adequate for the objectives.

QUALITY, ENVIRONMENT, FOOD AND FEED SAFETY POLICY

- ✓ To guarantee a **product that satisfy the customer** in terms of **quality** and **safety**;
- ✓ To absolve the duty in producing **legal and safe products**;
- ✓ To guarantee products **hygienic and sanitary safety** through the correct management of Company self-control based on HACCP principles system;
- ✓ To guarantee the **constant quality system evolution** so to promptly react in front of both internal and external variations;
- ✓ To guarantee necessary resources into the **development of activity system check**;
- ✓ To guarantee **satisfaction and personnel motivation**, as well as ethic and responsibility towards the personnel themselves;
- ✓ To actualize an in-depth **Supplier evaluation** so to reduce not compliant raw materials risks;
- ✓ To respect the current **environment legislation** and any possible agreement voluntary subscribed related on potential environment impact;
- ✓ To pursue the target of **continuous improvement** about the Company **environment performance**;
- ✓ To actualize any organizational, operational and technological efforts in order to **prevent water, air and soil contamination**;
- ✓ To **minimize energy and water consumption, as well as waste production**, so to support the recycling when possible;
- ✓ To Minimize and reduce as much as possible the risks arising from your business
- ✓ Maintenance of a standard of work compliant with the legal provisions on environmental matters (DLGS 152/06 and

similar)

- ✓ To guarantee **re-examination and constant improvements in policy and objectives**;
- ✓ To define **targets and environment goals**, to be included into the plant operative management and programs regarding Company development;
- ✓ Development of Food Safety culture in the company through:
 1. Training promotion, information and awareness raising activities;
 2. Company personnel involvement;
 3. Communication channels development between company and workers.

ALLERGEN POLICY

Sacchetto S.p.A. board, aware and sensitive toward issues related on allergen management, developed within its Management System and HACCP procedure, an **allergen policy so to optimise the consumption on the product said above**.

Convinced that the successful Company policy applications depend on anyone efforts and involvement, the Board made available necessary technical, economical and humans' resources.

Sacchetto S.p.A. works with **two different raw materials, WHEAT and RICE**.

The first one according to the current legislation is an allergen because of its presence of Gluten, on the other hand the second one IS NOT an allergen.

Therefore, the Board has established the following:

- ✓ Plan and construction of **individual production plants so to work the two raw materials separately**, in order to avoid any kind of wheat/gluten contamination during Rice working process;
- ✓ All raw material suppliers and transporters must have received the **requirements requested** by SACCHETTO S.p.A., in order to guarantee raw material's quality necessary for the production process;
- ✓ Periodically the Quality and Purchase Managers can implement a scheduled **audit, even if not formalized, on suppliers' locations** in order to check the correct companies' management. Nevertheless, since today, the Company has never registered a Not Conformity in its supply chain;
- ✓ **Enzyme and technological coadjuvant suppliers**, must always show technical sheets, safety sheets and **declaration about risks on potential allergen presence**;
- ✓ Periodic analysis on gluten-free final products and environment assessments;
- ✓ The **confectioned product stock** on warehouse shelves must be done so that even accidental bags damage will not affect the product underneath. Therefore, on a hypothetical shelving unit, the product stocked on the highest level will be rice starch (gluten free), on the levels below we will consequently find wheat starch gluten-free, then wheat starch and finally gluten at the bottom. Every day the quality department will make sure about the integrity and so the good conditions of all packaging stocked in internal warehouses.

The SO₂ allergen is used within Sacchetto SPA for NON-FOOD production, but for no reason it can get in touch with the production processes of our products, starches, proteins and alcohol intended for the FOOD sector.

Furthermore, it was also evaluated by analysis and studies over time, the potential contamination of other allergens in cereals we receive as Raw Material and consequently in the derivatives we produce. These possible contaminations are mentioned in the respective technical data sheets under the heading 'allergens table'.

Equal attention is places in **organic production** management that are periodically done during the year. Since there aren't specific plants for these productions, before every organic batch, all machinery must be stopped, washed and cleaned, where possible, and once restarted, a defined quantity of each intermedium and final products will be declassified as conventional. Each final product batch will be approved for sales only after being tested with multiresidues analysed in external accredited laboratories. Even in this case the final product stock in the warehouses must follow a logic. First and foremost, the Company will dedicate a specific area for organic products. When this is not possible, organic products will always be stocked above conventional products.

METAL POLICY

Sacchetto S.p.A. means to pursue a policy aimed to minimized **risks derived** from use of **sharp metallic tools**, including knives, box cutter and metal wires. For this reason, it has been communicated to all production personnel the following:

- ✓ Ban on knives, flick knives, switchblades;
- ✓ Ban on multiblade box cutter;
- ✓ Ban on leaving on production sites any sort of blades and metallic tools that can contaminate the product.

In each production department, during the **maintenance operations**, all workers should **avoid leaving their metallic tools on the site**. All workers should avoid **temporary operation with metallic wires or similar**. Particular attention should be placed on **nuts, screws, nails**, etc.

During shift uncovered by maintenance, the use of American Duct tape is allowed for temporary repairs.

These repairs must be communicated to the department manager and maintenance manager, who in the shortest time lapse should stop the production line, repair the damage and re-start the machinery.

The machinery **maintenance** often implies taking apart **screws and/or nuts**. The technician must be sure to operate in safety when places them during the operations.

Bear in mind that all products are always kept under control through filters, magnets and metal detectors.

WOOD POLICY

Sacchetto S.p.A Board, aware and sensitive toward issues related on **wood management**, developed an internal policy so to **optimise its use and promote wood recycling**.

Particularly, the Board has established the following:

- ✓ To favour, where feasible and economically sustainable, EPAL pallets so to favour their interchange and regeneration;
- ✓ To optimise pallet and means of transport regarding the shipment of related products;
- ✓ To require pallet suppliers to take back a product not in compliance and accommodable, so to reset wood disposal;
- ✓ Ban on introducing wood pallet in production departments, except for the packaging/bagging department where is necessary so to place product bags on pallet. However, in between pallet and product bag, a nylon or carton sheet has to be placed (based on customer requirements/needs), so to avoid direct contact between packaging and wood, as well as potential contaminations.

GLASS AND PLASTIC POLICY

Sacchetto S.p.A. Board, aware and sensitive toward issues related on structural damages and material composed by **glass or glass-like materials (hard plastic, polycarbonate and similar)**, developed within its Quality Management System, a Procedure for Glass and Glass-Like Materials Management.

Particularly, the Board has established the following:

- ✓ To compile, in collaboration with RGO, a list which includes objects divided per area and related glass management procedures;
- ✓ To nominate "Glass Managers" (divided per Company department) who have the following responsibility: to monitor all glasses and glass-like materials (hard plastic, polycarbonate and similar) with specific frequencies.

Furthermore, The Board guarantees that any customers' claim regarding glass and glass-like materials management, will be promptly administered and documented; when necessary, even further analysis on external laboratories will be guaranteed.

Lagnasco, 25th March 2024

SACCHETTO S. p. A.

President
(Mr. Giuliano Sacchetto)

Vice-President
(Mr. Giuseppe Sacchetto)

