



QUALITY POLICY

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1. INTRODUCTION

This Quality Policy defines the principles and guidelines that govern the METLAC Group's activities and processes. It promotes the efficiency and effectiveness of the operations carried out by the company up to the marketing of products characterised by high standards of quality and consistency of supply, in accordance with current regulations and the company's mission and vision.

The METLAC Group is focused on the total satisfaction of its Stakeholders, first and foremost customers, using its technical and production know-how. Every activity is done in accordance with the laws in effect, with particular attention on those concerning its operations, in compliance with the company's Code of Ethics, pursuing process efficiency, the quality of the products made, competitiveness in terms of performance and economics, reputation and respect for the environment.

2. BACKGROUND

The METLAC Group is an independent company that specialises in the design, production and sale of paint products and inks for the metal packaging sector, mainly intended for the food and beverage industry. The METLAC Group is a medium-sized company when compared to its competitors, which are mainly multinationals with production sites and service centres in various locations around the world.

The company's activities are dictated and influenced by the various contexts that revolve around it. The METLAC Group aims to be an economically competitive, innovative and reliable supplier in a market strongly influenced by very demanding customers.

The operational context is further complicated by the need to comply with food directives and the obligation to meet local, European and international requirements related to the production activity, the safe handling of hazardous chemicals used directly in production processes, safeguarding the health of the user and the end consumer and managing the environmental impact related to them.

The METLAC Group endorses this Quality Policy document and undertakes to disclose it to, and to have it enforced by, its direct and indirect Stakeholders. The document lays out the minimum acceptable standards for the maintenance of its Quality Management System, which is used to regulate the research, development, production, sale and technical assistance of the paint products and inks made.

2.1 REGULATORY REFERENCES

The METLAC Group operates in compliance with current regulations on quality. The company complies with the principles set out in UNI EN ISO 9001:2018.

The Quality Management System is also a key element on which the METLAC Group has built its Organisational Model. Its indirect positioning with respect to the food and beverage market, for which it provides coating materials and, therefore, for the internal and external protection of metal food packaging, has led to the progressive alignment of activities and processes with Good Manufacturing Practices (*GMP*) requirements. These guidelines generally address issues related to hygiene, plant design and construction, the use of equipment and its maintenance and cleanliness for the food and related sectors.

The METLAC Group considers these regulatory references and guidelines an essential foundation of its corporate culture; it applies these principles in an integrated way in view of the various areas on which its Corporate Management System is structured, namely Sustainability, Quality, the Environment, Health and Safety.

2.2 SCOPE OF APPLICATION

This Policy applies to the METLAC Group's resources, activities and processes, including those related to its upstream and downstream supply chain.

Specifically, it is addressed to:

- All the human resources employed directly and indirectly.
- Collaborators and consultants: external professionals who work in close synergy with the company, providing specialist services or operational support.
- Suppliers and subcontractors: companies and third parties involved in the supply chain, whose compliance with the principles of the Quality Policy is considered a fundamental requirement in order to collaborate with the company.
- *Business partners*: companies and organisations with which the METLAC Group has business dealings, including joint ventures, strategic partnerships and industrial alliances.
- Research and development activities focused on creating products that comply with the most stringent regulatory and statutory requirements.
- Production and governance processes.
- Sales of paint and ink products.
- Pre- and post-sales technical and commercial assistance.

3. COMMITMENTS

The METLAC Group is committed to achieving the following priority objectives to maintain and improve its Quality System:

- To understand the customer's needs through the continuous implementation of the service offered in order to ensure mutual improvement.
- To develop technologies and infrastructure to better meet changing quality, safety, environmental and sustainability needs.
- To ensure a high level of quality products and services.
- To promote and improve staff skills and awareness within the organisation.
- To handle complaints and reports from customers promptly, identifying the causes through analysis and implementing the appropriate corrective actions, so that the issues do not recur.
- To adopt, maintain and improve the efficiency of the company's integrated management system according to UNI EN ISO 9001 – UNI EN ISO 14001 – UNI EN ISO 45001.
- To promote individual responsibility and awareness of the importance of sustainability, quality, the environment and safety through regular training and information activities.

In this perspective of improvement, the METLAC Group has identified 3 key performance indicators (*KPIs*) on which to focus its commitment for the future: reducing the ratio between the value of complaints received and turnover; improving customer satisfaction, a process monitored by the sales department through an assessment of the satisfaction index; reducing the percentage of non-conformities found.

4. DISSEMINATION

This Quality Policy document is brought to the awareness of all internal and external stakeholders through appropriate communication tools, such as the institutional website (accessible at: <https://www.metlac.com/sostenibilita/>), the intranet platform within the *SQHSE* portal to which all operating personnel have free access, periodic information and training sessions open to all internal and external personnel. The summary version of this document, in paper format, together with similar versions of the Policy for Environmental Management Systems (ISO 14001) and the Safety Policy (ISO 45001), is posted on company bulletin boards.

The METLAC Group also reports on the activities carried out in accordance with its Quality Management System as part of its annual Sustainability reporting, to inform and raise awareness among its Stakeholders and to communicate the relative results obtained.

5. ROLES AND RESPONSIBILITIES

The management team is responsible for implementing and ensuring compliance with the Quality Policy through training and information initiatives. Employees are responsible for acting in accordance with this Policy, which forms an integral part of the contractual obligations assumed by employees, collaborators and all Stakeholders.

Failure to comply with the principles set out herein may result in sanctions or other measures being applied, as provided for by current legislation and applicable national collective bargaining agreements. In the event that a third party fails to comply with this Policy, the METLAC Group reserves the right to take the necessary measures, including termination of the contract, the assignment or any other existing relationship, arrangement or agreement. Furthermore, should the conditions exist, the company may demand compensation for damages as a result of the breach of this Policy.

6. APPROVAL AND REVIEW

This Policy document has been prepared by *SQHSE*. This version has been approved by the METLAC Group's Board of Directors. This document may be revised or amended in the event of a change or update to the Strategic Plans, as a result of mandatory regulatory aspects or organisational needs. Any new documents, in order to be considered valid, shall be submitted to and approved by the Board of Directors.

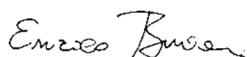
The METLAC Group, therefore, undertakes to monitor any development, both internal and external, in every country in which it operates, which might affect the Policy, constantly evaluating its performance and implementing the necessary actions with a view to continuous improvement.

The METLAC Group undertakes to identify, assess, prevent and mitigate the risks of a breach of this Quality Policy, promptly implementing appropriate remedial actions, if such an event occurs.

CEO
Pier Ugo Bocchio



General Manager Italy
Enrico Buriani



CRO
Guido Chiogna



7. GLOSSARY

GMP: “Good Manufacturing Practice” is a set of rules, procedures and guidelines that are followed in the food sector and for pharmacologically active substances. The METLAC Group, although not a manufacturer of drugs or food products, indirectly serves the food market and, therefore, applies these guidelines to improve its processes and to guarantee the quality and safety of the products marketed (page 4).

Joint venture. A joint venture provides for a commercial agreement between two or more legally and financially independent companies, of the same nationality or from different nations, which will share the risks and revenues until a common purpose is achieved (page 4).

Partnership. A partnership is a collaborative relationship between two or more companies, regulated by a contract, a formal agreement, in which the partners jointly deal with the establishment, management and implementation of a common project of an economic or social nature (page 4).

SQHSE: meaning the *Sustainability, Quality, Health, Safety, the Environment* function and referring to the corporate portal, i.e. the METLAC Group’s intranet storage space used to manage documentation relating to Sustainability, Quality, Health, Safety and Environmental practices (page 5-6).

Stakeholder: any individual, group, or entity that has an interest in or an influence over an organisation’s activities, decisions or results. Stakeholders are, for example, employees, customers and suppliers (pages 3 and 5).

UNI EN ISO 9001:2018: ISO 9001 defines the minimum requirements that an organisation’s Quality Management System must demonstrate it satisfies in order to ensure the level of product and service quality it claims to possess with itself and the market (pages 4-5).

UNI EN ISO 14001:2015: ISO 14001 is a voluntary international standard that provides a clear management framework to reduce an organisation’s environmental impact and to ensure that it meets legal requirements and builds stakeholder trust (page 5).

UNI EN ISO 45001:2018: ISO 45001 enables organisations to implement an occupational health and safety management system that helps organisations to better manage risks and improve their performance through the creation and implementation of effective policies and objectives (page 5).