



## *QUALITY and FOOD SAFETY POLICY*

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## 1. INTRODUCTION

This Quality and Food Safety Policy defines the principles and guidelines governing METLAC Group's activities and processes, with the aim of ensuring the marketing of safe products that comply with the highest standards of quality and food safety, while promoting the efficiency and effectiveness of the Company's operations, in compliance with applicable regulations, as well as the Company's mission and vision.

METLAC Group is committed to meeting the needs and expectations of its stakeholders, with primary focus on its customers, by leveraging its expertise and the best available production techniques, in full compliance with all applicable laws, customer requirements, and the Company's Code of Ethics. The Group pursues product quality in full alignment with its Corporate Policy, of which this document represents a specific extension focused on Quality and Food Safety. METLAC Group also recognizes that process efficiency is essential to maintaining competitiveness in both operational and economic terms. Furthermore, the Group considers the protection of its reputation as fundamental, which is reflected in safeguarding the health and safety of its employees and final consumers, as well as in full respect for the environment.

## 2. CONTEXT

METLAC Group is an independent, medium-sized company engaged in the design, production, and sale of coatings and inks for the metal packaging sector, primarily intended for the food and beverage industry.

The Company's activities are influenced by the competitive and highly regulated environment in which it operates, where compliance with food safety requirements is essential to ensuring customer trust and safeguarding public health. METLAC Group aims to be a competitive, innovative, and reliable supplier.

METLAC Group endorses this Food Safety Policy and is committed to communicating, promoting, and ensuring its application among its direct and indirect stakeholders. This Policy is intended to guide the Company's integrated Food Safety Management System, steering its research, development, production, sales, and technical support activities related to coatings and inks for food packaging.

### 2.1 REGULATORY REFERENCES

METLAC Group is committed to operating in compliance with applicable standards representing the state of the art in the fields of quality and safety.

To this end, the Company has established and structured its organization in accordance with the principles and requirements defined in the following standards:

- UNI EN ISO 9001 – Quality Management Systems
- UNI EN ISO 22000 – Food Safety Management Systems

METLAC Group is also fully committed to complying with the main legislation of the European Union, as well as with the regulations of non-EU countries and geographical areas to which its products are destined.

The main European Union regulatory references applicable to METLAC Group products are:

- Regulation (EC) No 2023/2006 on Good Manufacturing Practice for materials and articles intended to come into contact with food (GMP for FCM – Food Contact Materials);
- Regulation (EC) No 1935/2004 on materials and articles intended to come into contact with food.

The METLAC Group Food Safety Management System is designed to be integrated with other systems ensuring compliance with specific regulated requirements applied within the Organization, and represents a cornerstone of METLAC Group's organizational model.

Its positioning within the food and beverage market, to which it supplies materials intended for the coating and internal and external protection of metal food packaging, has led to the progressive alignment of its activities and processes with Good Manufacturing Practice (GMP) requirements.

## 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.

- All production and governance processes relevant to the Organization that may impact Food Safety.

### 3. COMMITMENTS

Through this Food Safety Policy, METLAC Group is committed to achieving the following objectives:

- Promote and support interactive communication aimed at understanding customer needs, to ensure product Quality and Food Safety and foster mutual continuous improvement.
- Develop and enhance technologies and infrastructure to effectively meet evolving quality and food safety requirements.
- Ensure a high level of quality of products and services.
- Guarantee product compliance with quality and food safety requirements throughout the entire supply chain.
- Promote Food Safety Culture at all organizational levels.
- Enhance competence and awareness of all involved personnel by providing training on hygiene, food safety, allergen management, and contamination prevention.
- Promptly manage customer complaints and non-conformities, including those related to food safety, by identifying root causes through analysis and implementing appropriate corrective actions to prevent recurrence.
- Monitor and manage risks, applying systematic mitigation measures for hazards related to chemical, physical, biological, or other relevant contamination, using the best available techniques appropriate to the sector.
- Ensure identification, traceability, and product trace-back capability for materials and finished products.
- Adopt, maintain, and continuously improve the effectiveness of the Integrated Management System in accordance with applicable international standards.
- Promote individual responsibility and awareness regarding the importance of Food Safety through regular training and communication activities.

In line with a continuous improvement approach, METLAC Group identifies the following Key Performance Indicators (KPIs) as priorities for future focus:

- Monitoring trends in Food Safety-related non-conformities, with the objective of reducing to zero the risk of non-compliant products reaching the market. This is ensured through appropriate classification of non-conformities (Food Safety class), monitoring of corrective actions and their effectiveness, and verification of the effectiveness and efficiency of product withdrawal/recall tests.
- Monitoring the ratio between the value of customer complaints and turnover.

- Monitoring customer satisfaction, through the evaluation of satisfaction index indicators.
- Reducing the percentage of non-conformities detected in production processes.

#### 4. DISSEMINATION

This Policy is communicated to all internal and external stakeholders through appropriate communication tools, including the corporate website (available at: <https://www.metlac.com/sostenibilita/>), the intranet platform within the Integrated Management System portal, accessible to all personnel, as well as through periodic information and training sessions extended to both internal and external personnel.

METLAC Group discloses the activities carried out in accordance with its Integrated Management System within its annual Sustainability Reporting, with the aim of informing and raising awareness among stakeholders and communicating the results achieved in this area.

#### 5. ROLES AND RESPONSIBILITIES Fino a qui

Top Management is responsible for the implementation and compliance of the Integrated Management System in line with the guidelines set out in this Policy, ensuring continuous monitoring and periodic review of the system, also aimed at achieving continuous improvement.

To this end, Top Management is supported by the following roles:

- Food Business Operator responsible for GMP → ensuring product compliance and effective communication with customers;
- Integrated Management System Manager → responsible for system monitoring and risk management;
- Food Safety Team – GMP → supporting internal communication and ensuring Food Safety requirements across the relevant processes;
- Internal Food Safety Coordinator – GMP → supporting the timely and orderly execution of activities;
- All Employees → responsible for acting in compliance with this Policy, which forms an integral part of their contractual obligations. This Policy is communicated to all employees and stakeholders.

Failure to comply with the principles set out herein may result in the application of sanctions and measures provided for by applicable legislation and collective labour agreements. In the event of non-compliance with this Policy by external parties, METLAC Group reserves the right to take all necessary measures, including the termination of any contract, assignment, or

other existing relationship, and, where applicable, to seek compensation for any damages arising from such violation.

## 6. APPROVAL AND REVIEW

The METLAC Group Quality and Food Safety Policy has been prepared by the SQHSE Department. The current version has been submitted for approval to the Board of Directors (BoD) of METLAC Group.

Any revision or amendment of this document shall be carried out in the event of changes to strategic plans, mandatory regulatory updates, or organizational needs. To be considered valid, all new or revised documents must be submitted to and approved by the Board of Directors.

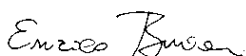
The METLAC Group, therefore, undertakes to monitor any development, both internal and external, in every country in which it operates, which might affect the Policy, constantly evaluating its performance and implementing the necessary actions with a view to continuous improvement.

The METLAC Group undertakes to identify, assess, prevent and mitigate the risks of a breach of this 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

**Food Safety Culture:** the shared values, beliefs, and norms that influence the mindset and behavior of all personnel with respect to food safety throughout the organization.

**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).

**HACCP:** an internationally recognized risk assessment approach used to conduct a systematic hazard analysis and to identify and control critical control points related to relevant production processes.

**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).