



Company Policy 2020

EUROFOOD management, aware that quality means first of all customers' satisfaction, continued, also along 2019, and will continue in 2020, to improve the internal integrated system management, confirming the range of obtained certifications, implemented from 2000, with the target of giving bigger and bigger guarantee about the company reliability and about the constancy of qualitative characteristics for the supplied products. Eurofood, also, in order to keep exporting its products to USA, has adopted a Food Safety Plan conforming to FSMA (Food Safety Modernization Act) and, in particular, to the Preventive Control for Human Food Regulation. The company has trained a PCQI (Preventive Controls Qualified Individual).

Current certifications are:

- ✘ Quality Management System certification conforming UNI EN ISO 9001:2015 standard, from 21/12/2000
- ✘ Environmental Management System certification conforming UNI EN ISO 14001:2015 standard, from 22/07/2005
- ✘ Traceability System in the Feed and Food Chain certification conforming UNI EN ISO 22005:2008 standard, from 01/06/2007
- ✘ Certification conforming IFS FOOD standard version 6, January 2012 Higher Level, from 2005
- ✘ Certification conforming BRC FOOD standard version 7, January 2015 to grade A, from 2010
- ✘ COSTCO certification
- ✘ Kosher certification from 2006
- ✘ Organic production certifications (Bio Suisse, EU Bio, Ifoam, Jas, Nop-Cor, Cina)
- ✘ Various certificates for products exportation worldwide
- ✘ Certification conforming UNI EN ISO 22000:2005 standard, obtained in 2015

Confident that the success of the integrated systems and the continuous improvement depend on the commitment and involvement of all company levels and positions, the management provided technical, economical and human resources which were needed. In particular, a new plant with a new wastewater treatment system was completed in 2014 and they are both operating at full speed. Furthermore, in 2017, the company started building the third plant, next to the other plant located in contrada Malvicino, which is now completed and will be operative within the first months of 2019.

The company management is committed, through various instruments, including the management review, to define objectives and strategies, documenting and divulging them to ensure that the company policy is understood, implemented and supported by all levels of the company.

The management started trade channels with new countries.

Eurofood documents, officially, the implementation of the Ethical Code as requested by some customers more sensitive to Ethical issue, although, it has been already in use within the company since ever. The company also intends to start the process for obtaining the SA8000 certification.

Listed below the basic targets of Eurofood integrated management system, divided by areas of interest:





ETHICAL POLICY

“Personnel” is considered who produces and generates company goods: Eurofood S.r.l. mission has always been focused on realization of products which were not only of high quality, healthy and safe, but also the result of a company life style constantly addressed towards principles of ethical conscience and solidarity.

Waiting to complete the certification process to obtain the SA8000, requirements adopted towards employees concern four areas: human rights, workers rights, protection against exploitation of people under age, guarantee of a safe and healthy workplace.

Company future is also related to the preservation of a correctitude and honesty image towards people and organizations which get in touch with it. Eurofood S.r.l. intends to reach this target through an honest behaviour, with consideration of other people, with observance of its own obligations, and also with observance of the legislation in force and of the Smeta code of conduct. All company personnel has to operate, not only with observance of law, but also with observance of ethical and correctitude principles.

The company is therefore committed to:

- ✘ Not take advantage of, and also encourage, child labour;
- ✘ Guarantee the possibility to study to workers who intend to reach an educational qualification;
- ✘ Not adopt forced labour;
- ✘ Apply all possible safety criteria in order to protect workers health;
- ✘ Constantly evaluate the safety level of the installed systems and, in preventive way, of all the future systems which are already in a planning phase;
- ✘ Guarantee the highest safety of working activities, included hygienic aspects, in order to preserve employees health as primary good and to favour the best conditions in the workplace;
- ✘ Periodically evaluate the health status of all employees;
- ✘ Guarantee every type of freedom of association and of collective bargaining;
- ✘ Not exert any type of discriminations;
- ✘ Guarantee clearly that no type of persecution will be tolerated during working activity;
- ✘ Help and support immediately employees who are subjected to persecutions;
- ✘ Carry out, when needed, disciplinary measures in full respect of the person and of the laws in force;
- ✘ Guarantee the observance of the working hours defined by contract;
- ✘ Guarantee salaries which have, not only the minimum wage according to law, but also the capacity, when the minimum wage cannot guarantee it, to lead dignified life;
- ✘ Guarantee the observance and conformity to applicable legislation/regulation, to the possible commitments subscribed by the company and to all international ethical rules pertinent on the subject;
- ✘ Maintain constantly monitored the level of system conformity to rules and laws of reference;
- ✘ Guarantee that each member of the company keeps discretion and secrecy about the information concerning company activity;
- ✘ Not allow any type of corruption towards customers, suppliers, and other subjects who can affect the company activity;
- ✘ Keep an image of integrity and transparency in working behaviours (offering or receiving presents, invitations to lunch in occasional way, can be a chance to build or enforce business relationships; prudence is anyway requested and, in any case, it is not allowed to offer or receive presents which can appear as an influence on company decisions);





- ✘ Guarantee that each member of the company operates according to company interest avoiding to carry out actions which are in conflict with the interest of the company;
- ✘ Make sure that each member of the company keeps a working conduct ethically correct and honest, with benefit of the interests of the company, of its customers and of its shareholders;
- ✘ Instruct all personnel, of each level, with training courses, about the principles on which the ethical company policy is inspired, and about workers' rights;
- ✘ Transmit the principles of the ethical policy to the suppliers, encouraging them to apply those principles in their structures, with the availability to receive a second part audit about it;
- ✘ Transmit and share the ethical policy concepts also to customers and to organizations linked to the company.

The ethical policy concerns all personnel, at every level, not only internal, but also external collaborators, sales personnel and suppliers. It is then communicated to all personnel of the internal plant (direction and rest) and to personnel of external companies, to suppliers and is available to the public and other societies which interact with the company and/or request it.

BRIBERY POLICY

Eurofood has a position of absolute intransigence towards any form of corruption, even towards staff of private companies.

In this sense, the Company fully recognizes its commitment to guarantee actions and behaviors based exclusively on criteria of transparency, correctness and moral integrity, which prevent any attempt at corruption.

This position helps to comply with the anti-corruption law requirements and the commitments to which the Company has voluntarily bound itself through this declaration.

Eurofood's commitment against corruption prohibits Personnel, Partners, and, in general, anyone who carries out activities on behalf of the Company to request, promise, offer or receive gifts, gifts or benefits, potential or effective, from or to subjects external to the Company, whether they are public officials or persons in charge of the public service, government representatives, public employees or private citizens, both Italian and from other countries, such as to determine an illegal conduct or, in any case, such as to be interpreted by an impartial observer, as aimed at the achievement of an advantage, even non-economic, considered relevant by custom and common conviction, also intended as facilitation, or guarantee of achievement, of services in any case due in business activities.

Each employee, director and executive, business partner and any other external 'interested party' is required to read, understand and apply the procedures and protocols of the corporate management system (including ethical and anti-corruption requirements) and to behave in compliance to what is established by it.

For this to be possible, the entire Organization must know and share the Company's Bribery Policy which is contained in the following concepts:

- ✘ Senior Management's commitment to preventing corruption by respecting legislative compliance and the requirements of the corporate management system;
- ✘ Zero tolerance, appropriate procedures, active role of management, effective communication, constitute the reference framework for the definition and pursuit of improvement objectives;
- ✘ Encouragement to report suspicious cases in good faith by ensuring the protection of the whistleblower in all forms;





- ✘ Sanction for any form of non-compliance with the rules for preventing corruption and the contents of this corporate policy;
- ✘ Commitment to continuous improvement of risk management and prevention processes.
- ✘

FOOD SAFETY, ENVIRONMENT AND QUALITY POLICY

- ✘ Guarantee always productions which satisfy the customer for quality and safety standards;
- ✘ Absolve the obligation to produce legal and safe products;
- ✘ Guarantee always the hygienic-sanitary safety of products through the correct company self control management based on HACCP system principles;
- ✘ Guarantee the constant evolution of the integrated system in order to adapt the conformity according to the change of internal and external conditions;
- ✘ Guarantee the needed resources for the treatment of activities of system check;
- ✘ Guarantee personnel satisfaction and motivation, and also ethic and responsibility towards personnel itself;
- ✘ Implement a deep evaluation for suppliers in order to reduce the risks of non conforming raw materials;
- ✘ Define the present own position in relation to the environment and the external context, carrying out an analysis of the environment and of the context;
- ✘ Respect the environmental legislation in force and possible agreements subscribed voluntarily concerning own significant environmental impacts;
- ✘ Pursue the goal of continuous improvement of own environmental performances;
- ✘ To carry out every effort according to organizational, operative and technologic terms in order to prevent water, air and soil pollution;
- ✘ Minimize energy and water consumption and wastes production, promoting recycling if possible;
- ✘ Guarantee the review and continuous improvement of policy and objectives;
- ✘ Define environmental objectives and targets, to be integrated with the operative management of the plant and company development plans.

ALLERGENS POLICY

EUROFOOD management, aware and sensitive to problems related to allergens, developed, within its own Integrate Management System and HACCP, an allergens policy in order to optimize the consumption of those products.

Aware that the success of the application of company policies is related to the effort and involvement of all people levels and positions of the company, the management made available technical, economical and human means which are arranged needed, and organized the training of all personnel.

In particular the management, concerning the only allergen present in the plant, E224, has arranged as follows:

- ✘ EUROFOOD requirements, which are requested to guarantee the conformity of the processed raw material, have to be communicated to fruit suppliers and forwarders;
- ✘ Periodically, the raw material purchasing responsible conducts audits without notice, even not formalized, at suppliers plants, in order to check the correct management, although until today we do not have registered non conformities for fruit procurement;





- ✘ Suppliers of raw materials different from citrus fruits, need for production, must supply always specifications, safety data sheet and of food grade suitability for primary packagings, and also declarations about the risk of allergens presence within their plant;
- ✘ Controls at reception of citrus fruits and other production materials supplied are always carried out and recorded;
- ✘ Organic product has to be processed always before the conventional one;
- ✘ Tanks (refrigerated) for exclusive use of organic juice are identified;
- ✘ In any case, for each production, all systems and tanks have to be sanitized according to cleaning procedures which are then validated by surface swap tests taken by the internal laboratory;
- ✘ Handling of potassium metabisulphite, the only allergen present in the plant, can be carried out exclusively by the responsible of juices preparation;
- ✘ SO2 bags are stored on pallets in special airy area, separated by the production area, and are always monitored for discharges and leakages. Product specifications and safety data sheets have to be in place and also the pallets need to be marked with the sign "ALLERGEN";
- ✘ SO2 bags are carried into the production area one at a time and are immediately removed after use, then closed and put back to the storage area;
- ✘ Mixing of SO2 with juice occurs always in a devoted tank and according to what indicated by the Production Responsible with a written communication addressed to the Juice Preparation Responsible;
- ✘ The juice preparation responsible, after using the allergen, washes his hands and substitutes possible PPD (Personal Protective Devices) used during handling;
- ✘ in case of not perfectly sealed packaging, the juice preparation responsible eventually removes the discharged product, eliminating the equipments used for the clearing itself. The same person reports to the Quality Control Office or to Semi-finished Products Responsible possible anomalies of allergens discovered during storage phase. In any case, monthly, the Quality Office controls the packagings conditions of allergens and their management;
- ✘ washing of the used line is carried out according to HACCP manual procedures, paying particular attention to rinsing;
- ✘ goods containing the additive need to be properly labelled and identified. Goods sent to the customer are always accompanied with a certificate of analysis stating the exact quantity of the additive.

METALS POLICY

EUROFOOD intends to pursue a policy meant to minimize the hazards arising from the use of sharp metal tools, including knives, cutters, needles and electric wires. For this reason, it was communicated to the plant personnel as follows:

- ✘ prohibition to use flick knives;
- ✘ prohibition to use multi-blade cutters;
- ✘ prohibition to leave within production areas blades and metallic tools which may contaminate the product.

In particular, in the extraction area, during maintenance operations, workers must avoid carefully to leave their iron and/or steel tools around the place. Provisional reparations with use of wire or similar products should be avoided. Particular attention needs to be paid to nuts, screws, nails, and so on.

Besides, during juices blending phases and following drums, bottles and plastic shapes filling, particular attention is requested about what follows:

- ✘ Boxes with inside polyethylene bags or other materials used for packing may contain pins or metallic brads. Once emptied, they must be placed inside special containers, making sure that nothing is left on the floor or on pallets;
- ✘ Use of wire (plastic-coated) to seal the polyethylene bags containing juice. Care needs to be taken at the end of production in order to store wires back in the warehouse or cupboard;





- ✘ Use of cutters (to open boxes and bags) is allowed, but people from the area who use them have to inform the personnel responsible about it.
- ✘ Maintenance of packing systems involves screws and/or nuts disassembly. The maintenance man has to take care about put them in a safe place during his intervention.

However, it has to be remembered that products have to be always maintained under control through filters and magnets.

WOOD AND PLASTIC POLICY

EUROFOOD, aware and sensitive of problems related to wastes management, has developed a wood and plastic policy in order to optimize the consumptions of those materials and promote the recycling.

In particular the management has arranged as follows:

- ✘ Have a preference, when possible and economically sustainable, EAPL pallets, in order to facilitate their interchange and regeneration;
- ✘ Optimize pallets for the products to be transported and for the means of transport;
- ✘ Commitment of pallets suppliers to recall non conforming or non repairable pallets, in order to zero wood disposal;
- ✘ Prohibition of introducing wood pallet in the production area, a part from the time needed to carry bottles to the filling machine.

Furthermore, concerning plastic:

- ✘ Prefer and advise the customers, when possible, about the use of aluminium caps instead of plastic ones;
- ✘ Optimize and set the machines in order to minimize the loss of stretch and shrink film;
- ✘ Reuse, when possible, the packing plastic purchased, before arranging the disposal;
- ✘ Purchase of all plastic layers used to divide the pallets, by the customers who reuse them.

At last it is underlined the company will to test new ecological and biodegradable plastics for the department which produces the plastic bottles.

GLASS POLICY

EUROFOOD management, aware of the problems related to damages of structures and materials made out of glass or glass-like materials (hard plastic, polycarbonate and similar materials), has deemed appropriate to develop within its own Integrated Management System and HACCP, a *Glass and Glass-Like Materials Management System*.

In particular, the management has arranged as follows:

- ✘ Assignment of the “ Company Glass Responsible” who has got the following duties:
 - verify that what is stated in the present document for glass policy and the listed procedures is enforced within the company;
 - monitor all glass and glass-like materials (hard plastic, polycarbonate and similar materials);
 - draw up a map of risk, in which are underlined the position of each glass element and of glass-like materials, and the evaluation of the related level of risk (low, medium, high), according to the nearness of product/raw material to glass and to breakage probabilities that glass can have according to the contact with operators or with particular working conditions;
 - carry out risk evaluation and apply, at the same time, glass policy considering all necessary preventive measures needed to eliminate the possible risks caused by breakages of other materials;





- draw up, in cooperation with RGQA and HACCP Responsible, a procedure in which are listed the modalities for glass management through a range of actions addressed to minimize the risk, also through the replacement, when possible, of glass with plastic material and with the gradual application of adhesive film if glass replacement is not possible;
 - carrying out daily controls on integrity of systems where the presence of glass is considered at high risk and describe the procedure to be activated in case cracks and breakages are noticed;
 - proceed monthly with the inspection of the status of all materials made with glass or similar which have been catalogued and which are not considered of high risk, and describe the procedure to be activated in case cracks and breakages are noticed.
- ✘ Settlement of practice in order to prevent product contamination also through minimization of glass presence, the protection of the glass itself and the monitoring of glass and similar materials;
 - ✘ Settlement of practice to be followed in case of glass or glass-like breakage;
 - ✘ Settlement of practice which describes the ways of a glass (or glass-like) substitution following breakages.

The Management ensures also that any claim made by customers concerning glass and glass-like materials will be faced and documented immediately and, if needed, analysis will be taken in external laboratories.

The Management commit itself to subscribe what declared in the company policy for 2019 and to divulge it to all employees. Furthermore the Management commit itself to prove the correct application of what stated in this document, maintaining the certifications through audits carried out by accredited bodies.

Capo d'Orlando, 28/01/2020

The Management

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