



Company Policy 2024

The management of Eurofood, recognizing that quality is primarily customer satisfaction, continued to improve its integrated management system internally in 2023 and will continue to do so in 2024. The company has reaffirmed the range of certifications obtained since 2000 with the aim of providing increasing guarantees of the company's reliability and the consistency of the quality characteristics of the supplied products.

Furthermore, to continue exporting its products to the USA, Eurofood has developed a Food Safety Plan in compliance with the requirements of the FSMA (Food Safety Modernization Act) and specifically the Preventive Control for Human Food Regulation. The company has also trained a PCQI (Preventive Controls Qualified Individual) and an FDQI (Food Defense Qualified Individual).

The current certifications include:

- Certification of the quality management system in compliance with the UNI EN ISO 9001:2015 standard since 21/12/2000.
- Certification of the environmental management system in compliance with the UNI EN ISO 14001:2015 standard since 22/07/2005.
- Certification of the traceability system in compliance with the UNI EN ISO 22005:2008 standard since 01/06/2007.
- Certification in compliance with the IFS FOOD version 7 standard at the Higher Level since 2005.
- Certification in compliance with the BRC FOOD version 8 standard at grade A since 2010, and grade AA achieved in 2022.
- Costco certification since 2008.
- Kosher certification since 2006.
- Organic product certifications (Bio Suisse, EU Bio, JAS).
- Certification in accordance with the UNI EN ISO 22000:2005 standard obtained in 2015.
- Demeter Certification since 2015
- SA8000:2014 certificate since 10/12/2020.
- Fairtrade certificate since December 2020.
- Registration on the ECOVADIS platform for corporate sustainability since 2020.
- SMETA 4 PILLARS certificate since May 2022.
- Various certificates for product export worldwide.

Believing that the success of the integrated system and continuous improvement depend on the commitment and involvement of all levels and functions within the company, the management has provided the necessary technical, financial, and human resources. In 2014, both the new facility and wastewater treatment plant were completed and operational. In 2017, the construction of a third facility adjacent to the one located in Malvicino began, and it is now completed and fully operational since activities started in 2019.

The management, through various tools including Management Review, commits to define objectives and strategies, document them, and disseminate them to ensure that the company policy is understood, implemented, and supported by all levels of the organization, and is also committed to continuously improving the site's food safety culture, legality, authenticity and quality. The management has also initiated new commercial channels with new countries.

Eurofood officially documents the adoption of the Code of Ethics, which was previously highlighted by the most attentive customers. In fact, the company obtained SA8000 certification at the end of 2020.

Below are the key objectives of Eurofood's integrated management system divided by areas of interest.





ETHICAL POLICY

The "personnel" is the one who produces and generates company assets: the mission of Eurofood S.r.l. has always been focused on creating products that are not only of high quality, healthy, and safe but also the result of a corporate lifestyle constantly guided by ethical consciousness and solidarity principles.

Having obtained SA8000 certification, the company continues to adhere to the requirements concerning workers in four areas: Human Rights, Workers' Rights, Protection against Child Exploitation, and Ensuring Safety and Health in the workplace.

The future of the company also depends on maintaining a reputation for fairness and honesty towards individuals or organizations that encounter it. Eurofood S.r.l. intends to achieve this goal through honest conduct, consideration for others, respect for obligations, compliance with applicable laws and ethical codes.

All company personnel are required to operate not only in accordance with the law but also based on principles of ethics and fairness. Therefore, the company commits to:

- Not engage in, or support in any way, child labor.
- Ensure that workers have the opportunity for education and obtaining qualifications.
- Not practice forced labor.
- Apply all possible safety criteria to protect the health of workers.
- Continuously evaluate the safety level of existing and future installations, starting from the design phase.
- Guarantee the highest level of safety in work activities, including hygiene aspects, to safeguard the primary asset of its employees: their health, and promote the best working conditions.
- Periodically assess the health status of all employees.
- Ensure freedom of association and collective bargaining.
- Not engage in any form of discrimination.
- Clearly state that no form of persecution will be tolerated during work activities.
- Provide immediate assistance and support to workers subjected to persecution in the workplace.
- Implement disciplinary practices, when necessary, fully respecting the individual and current regulations.
- Ensure compliance with contractually defined working hours.
- Ensure salaries that, in addition to meeting legal minimum requirements, provide the ability, if minimum contractual standards do not guarantee it, to lead a dignified life.
- Ensure respect for and compliance with applicable legislation/regulations, any commitments undertaken by the company, and all relevant international ethical standards.
- Continuously monitor the system's compliance with relevant laws and regulations.
- Ensure that each member of the company maintains the confidentiality of information regarding business activities.
- Not tolerate any form of corruption towards customers, suppliers, or other parties that may influence the company's activities.
- Maintain an image of integrity and transparency in work-related behaviors (occasional offers or invitations to lunch can be a means to build or strengthen business relationships; however, caution is required, and offering or accepting gifts that may appear to influence the company's decisions is not allowed).
- Ensure that each member of the company acts in the company's best interest, avoiding actions conflicting with its interests.
- Encourage each member of the company to maintain ethically correct and honest work conduct, benefiting the interests of the company, its customers, and stakeholders.
- Provide all employees, at every level, with training courses that impart the principles on which the company's ethical policy is based, as well as workers' rights.
- Transmit the principles of the ethical policy to suppliers, encouraging them to apply them in their own facilities, with the availability for second-party inspections.
- Transfer and share the concepts of the ethical policy with customers and organizations that interact with the company.





The Ethical Policy applies to all company personnel, at all levels, including internal and external collaborators, as well as sales staff and suppliers. It is communicated to all personnel on-site (both managerial and non-managerial), external personnel, and suppliers. It is also made available to the public and to entities that interact with the company and/or request it.

ANTI-CORRUPTION POLICY

Eurofood has a position of absolute intolerance towards any form of corruption, even towards personnel of private companies. In this regard, the company is fully committed to ensuring actions and behaviors based solely on transparency, fairness, and moral integrity, preventing any attempt at corruption.

This position contributes to complying with anti-corruption legal requirements and commitments voluntarily undertaken by the company through this statement.

Eurofood's commitment against corruption prohibits employees, partners, and anyone acting on behalf of the company from requesting, promising, offering, or receiving gifts, favors, or benefits, potential or actual, from external parties to the company, whether they are public officials or public servants, government representatives, public employees, or private citizens, both Italian and from other countries. These gifts or benefits should not lead to illicit conduct or be interpreted by an impartial observer as aiming to obtain an advantage, even if non-financial, considered significant according to common practice and common understanding. This also includes facilitation or guarantee of achieving performance that is due in business activities.

Every employee, manager, director, business partner, and other external stakeholders are required to read, understand, and apply the procedures and protocols of the company's management system (including ethical and anti-corruption requirements) and behave in accordance with them.

For this to be possible, it is necessary for the entire organization to know and share the company's Anti-Corruption Policy, which is based on the following concepts:

- Commitment of Top Management to prevent corruption by respecting legal compliance and the requirements of the company's management system.
- Zero tolerance, appropriate procedures, active role of management, effective communication, constitute the framework for defining and pursuing improvement objectives.
- Encouragement of reporting suspected cases in good faith, ensuring protection in all forms for the informant.
- Sanctions for any form of non-compliance with corruption prevention rules and the contents of this corporate policy.
- Commitment to continuous improvement of management processes and risk prevention.

QUALITY, ENVIRONMENT ADN FOOD SAFETY POLICY

- Always ensure productions that satisfy the customer in terms of both quality and safety.
- Fulfill the obligation to produce legal and safe products.
- Always guarantee the hygienic and sanitary safety of products through proper management of the company's self-control based on the principles of the HACCP System.
- Ensure the constant evolution of the integrated system to adapt its compliance to changing internal and external conditions.
- Provide the necessary resources for carrying out system verification activities.
- Ensure the satisfaction and motivation of personnel, as well as ethics and responsibility towards the personnel themselves.
- Conduct a thorough evaluation of suppliers to reduce the risks of non-compliant raw materials.
- Establish the current position in relation to the environment and the entire external context by conducting an environmental analysis and context analysis.
- Comply with applicable environmental legislation and any voluntarily subscribed agreements regarding significant environmental impacts.





- Pursue the objective of continuous improvement of environmental performance.
- Increase the number of solar panels installed.
- Make every effort in terms of organizational, operational, and technological aspects to prevent pollution of water, air, and soil.
- Minimize energy and water consumption and waste production, promoting recovery where possible.
- Ensure the review and continuous improvement of policies and objectives.
- Define environmental objectives and targets to be integrated with the operational management of the facility and company development programs.

FOOD SAFETY CULTURE

Eurofood firmly believes that the issues related to companies and the food market can be addressed and overcome by observing them from a new perspective, leveraging a strong "Top to Down" commitment, from top management to every operator in the food company. A strong commitment to "Behavior Change," considered a basic and fundamental prerequisite, has allowed Eurofood to implement a truly effective Food Safety Management System.

Through self-assessment and analysis of its level of culture, analysis of homogeneous groups of workers, monitoring of changes, and a training plan for necessary corrections, Eurofood has defined its Food Safety Culture as a product of individual and group values, attitudes, skills, and behavioral patterns that determine the involvement, attitude, and competence of a corporate health and safety program.

In a nutshell, this plan describes "how the company does things." This new approach has led to the necessary change involving and including:

- Top management, called upon to provide clear demonstrations of commitment and support to company values: Priorities may change depending on circumstances, but values do not!
- Company production managers, following the principle of "Walk the talk," actions speak louder than words.
- Continuous monitoring of the work environment, its dynamics, including attention and listening to advice and/or issues raised by workers.
- Workers, with continuous correction of wrong behaviors.
- The proposal of new training tools tailored to the specific characteristics of workers (gender, age, religion, ethnicity, etc.), in which the seed of culture is believed to sprout.

The modern concept of "Culture" can be understood as the set of acquired knowledge and practices that are transmitted from generation to generation. Culture is shaped by the thoughts and behaviors that characterize a social group, learned through socialization processes and persisting over time. Ideally, workers, especially among peers, can constructively learn to manage critical food safety procedures with the correct behavioral attitudes through emulation, transmitting these positive attitudes cascading throughout the entire organization, thus influencing the performance of all employees, especially new ones.

ALLERGEN POLICY

The General Management of Eurofood, aware of and sensitive to the issues related to allergen management, has developed a policy for allergens within its Integrated Management System and HACCP to optimize the use of these products. Recognizing that the success of implementing company policies depends on the commitment and involvement of all levels and functions within the company, the management has provided the necessary technical, economic, and human resources and has arranged for training for all staff members on this matter.

Specifically, regarding the only allergen present in the company, E224, the management has established the following measures:

- Requirements for citrus suppliers/transporters must be communicated to ensure the suitability of the processed raw materials.





- The purchasing manager periodically conducts unscheduled, even informal, audits at suppliers' premises to verify their proper management. To date, no non-conformities in sourcing have been recorded.
- Suppliers of raw materials other than citrus, necessary for production, must always provide technical, safety, and food suitability data sheets for primary packaging, as well as declarations regarding the risk of allergen presence in their facilities.
- Acceptance checks must always be performed and recorded for both citrus and other procured production materials.
- Organic products must always be processed before conventional products.
- Dedicated tanks for organic juice (refrigerated tanks) are identified.
- After each production process, all equipment and tanks must be sanitized according to cleaning procedures, which are then validated through surface swabs conducted by the in-house laboratory.
- The management of potassium metabisulfite, the only allergen present in the company, can only be carried out by the juice preparation manager.
- Sulfur dioxide (SO₂) bags are stored on pallets in a dedicated ventilated area, separate from the production facility, with attention given to any leaks or spills. The technical data sheet and safety data sheet must be present, and the label "ALLERGEN" must be affixed.
- SO₂ bags are brought to the processing area one at a time and immediately removed after use to be sealed and relocated to the storage area.
- Mixing SO₂ with the juice always occurs in a dedicated tank, following the instructions given by the Production Manager through written communication to the Juice Preparation Manager.
- After using the allergen, the juice preparation manager washes hands and replaces any personal protective equipment used during handling.
- In the case of imperfectly sealed packaging, the juice preparation manager removes any spilled product, eliminating the tools used for cleaning. Any anomalies encountered in the storage of allergens are reported to the Quality Office or the Semi-Finished Production Manager. Additionally, the Quality Office performs monthly checks on the conditions of allergen packaging and their management.
- The cleaning of the dedicated production line follows the procedures outlined in the HACCP manual, with particular attention to rinsing.
- Merchandise with added additives must be properly labeled and identified. Goods sent to customers always include a certificate of analysis indicating the exact quantity of the additive.

METAL POLICY

Eurofood aims to pursue a policy aimed at minimizing the hazards associated with the use of sharp metallic tools, including knives, box cutters, needles, and metal wires. To this end, the following guidelines have been communicated to the factory personnel:

- Prohibition on using switchblade knives.
- Prohibition on using multi-blade box cutters.
- Prohibition on leaving blades and metal tools that can contaminate the product in the production areas.

In particular, in the extraction department, during maintenance operations, employees must diligently avoid leaving their iron and/or steel tools behind. Temporary fixes using wire or similar materials should be avoided. Special attention should be given to nuts, bolts, nails, etc.

Furthermore, during the blending of juices and subsequent bottling or filling stages, the following precautions must be taken:

- Boxes containing polyethylene bags or other packaging materials may contain pins or metal points. Once emptied, they should be placed in designated containers, ensuring nothing is left on the floor or pallets.
- The use of plastic-coated wire ties to seal polyethylene bags containing juice is permitted. At the end of the process, the ties should be carefully stored in the warehouse or cabinet.
- The use of box cutters (for opening boxes and bags) is allowed, but the personnel in the department using them must inform the personnel manager of their possession.





- Maintenance of the packaging equipment involves disassembling screws and/or nuts. The maintenance personnel must ensure their safe storage during the intervention.

It is important to note that products should always be monitored using filters and magnets.

WOOD AND PLASTIC POLICY

Eurofood, aware of and sensitive to issues related to waste management, has developed a wood and plastic policy to optimize the consumption of these materials and promote their reuse. The following measures have been implemented:

Regarding wood:

- Preference for EPAL pallets, whenever possible and economically sustainable, to facilitate interchangeability and regeneration.
- Optimization of pallets for the respective products to be transported and the means of transportation.
- Suppliers of pallets are committed to taking back non-compliant and non-repairable pallets to eliminate wood disposal.
- Prohibition of introducing wooden pallets into production, except for the time necessary to transport glass bottles to the machine.

Regarding plastic:

- Preference for and recommendation to customers, whenever possible, to use aluminum caps instead of plastic caps.
- Optimization and adjustment of machines to minimize waste of shrink and stretch film.
- Reuse of purchased plastic packaging, where possible, before disposal.
- Purchase of all used plastic pallets used as dividers in pallets by customers who reuse them.

Finally, it should be noted that the company is willing to test new environmentally friendly and biodegradable plastics for the bottle production department.

GLASS POLICY

The General Management of EUROFOOD, aware of the issues related to the damage of structures and materials made of glass or glass-like materials (hard plastic, polycarbonate, and similar), deemed it appropriate to develop a Glass and Glass-Like Materials Management System within its Integrated Management System and HACCP.

In particular, the Management has established the following:

Appointment of a "Corporate Glass Manager" with the following responsibilities:

- Ensure the implementation of the glass policy and related procedures within the company.
- Monitor all glass and glass-like materials (hard plastic, polycarbonate, and others).
- Create a risk map that highlights the location of each glass element and glass-like material and assesses the associated risk level (low, medium, high), considering the proximity to the product/raw material and the likelihood of breakage based on contact with operators or specific working conditions.
- Conduct risk assessments and apply preventive measures to eliminate potential risks caused by fractures of these materials.
- Collaborate with RGQA (Quality Manager) and the HACCP Manager to develop a procedure that outlines the glass management methods, including interventions aimed at minimizing risks, such as replacing glass with plastic and gradually applying adhesive films when glass replacement is not feasible.
- Perform daily checks on the integrity of high-risk glass installations and describe the procedures to be activated in case of injuries or breakages.
- Conduct monthly inspections of all categorized low-risk glass or similar materials and describe the procedures to be activated in case of injuries or breakages.





- Establish a procedure for preventing product contamination by minimizing the presence of glass, protecting it, and monitoring glass and similar materials.
- Define a procedure to be followed in case of glass or similar materials breakage.
- Define a procedure for the replacement of broken glass (and similar materials).

The Management also assures that any customer complaints regarding the management of glass and glass-like materials will be promptly addressed and documented, and if necessary, analyses will be conducted at external laboratories.

The Management commits to endorse the stated policies for 2024 and to disseminate them to all employees. Furthermore, the Management pledges to demonstrate the proper implementation of the policies outlined in this document by maintaining certifications through audits conducted by accredited bodies.

Capo d'Orlando, January 9th, 2024

General Manager

