



CREALIS GROUP

QUALITY POLICY

Approved by Board of Directors

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2. Introduction

The success of the **Crealis Group** (hereinafter also “**Crealis**” or “**Group**”) is founded on trust, innovation, and uncompromising commitment to quality in all products and services. Our customers, employees, partners, and communities expect us to deliver solutions that are safe, compliant, sustainable, and aligned with the highest international standards. This Policy defines the Group’s commitments and principles in managing in managing quality across all organizational processes and activities., ensuring compliance with BRCGS, ISO 9001, and ISO 22000/FSSC 22000 requirements, while embedding sustainability and ESG considerations in line with the European Sustainability Reporting Standards (ESRS), particularly ESRS S4 on “Customer & Product Responsibility.”

2.1. Aims of the Policy

Through this Policy, Crealis aims to:

- Maintain an effective, efficient, and certified Quality Management System Aligned with ISO 9001:2015 standards at all Group companies.
- Guarantee the highest levels of product safety and quality across all markets in which we operate.
- Safeguard consumer health by systematically applying preventive and risk-based approaches (HACCP and risk management).
- Ensure compliance with applicable legal, regulatory, and voluntary standards (ISO, BRCGS, customer codes).
- Strengthening customer trust through transparency, responsibility, and continuous improvement.
- Integrate product responsibility and sustainability into innovation, packaging, and production processes.
- Embed quality culture and shared responsibility across all organizational levels and functions, with clear accountability for quality outcomes;
- Foster continuous improvement in quality performance through systematic analysis, innovation, and investment in people and technology;
- Integrate sustainability, environmental responsibility, and ESG principles into quality management and product development processes.

2.2. Scope and Addresses

This Policy applies to all Crealis Group companies, covering:

- All processes and activities that impact the quality of products and services delivered to customers;
- All products and packaging solutions manufactured and supplied by the Group.
- All employees, managers, and contractors whose activities impact product quality and safety
- Suppliers and business partners, who are required to uphold equivalent standards.

2.3. Reference Principles

The Policy is based on:

- ISO 9001:2015 (Quality Management Systems).
- ISO 22000/FSSC 22000 (Food Safety Management).
- BRCGS Global Standards for Packaging & Consumer Products.
- Codex Alimentarius – HACCP Principles.
- EU & International regulations on consumer safety and labeling.

- ESRs S4 – Customer & Product Responsibility.
- UN Global Compact principles and OECD guidelines
- Applicable compliance and anti-corruption models adopted by the relevant Group companies (including, where applicable, Model 231)

2.4. Relevant impacts and stakeholders

As part of the materiality analysis conducted by the Group, Crealis has identified relevant positive and negative, actual and potential impacts related to Quality Management Systems. These impacts reflect the compagni responsibility to:

Material topic	Identified impacts and risks	
Customers & endusers	Manufacturing inconsistencies leading to substandard quality	Risk
	Failure to meet regulatory or certification requirements	Risk
	Loss of customer trust due to recalls, complaints, or safety incidents	Risk
	Delivering consistent, safe, and reliable products strengthens relationships.	Positive impact
	Meeting international quality/safety standards opens new markets and differentiates from competitors.	Positive impact
Employees	Lack of clear Quality Procedures and inadequate training	Risk
	Clear roles and accountability	Positive impact

3. Group commitment

3.1. Quality Management System Implementation

Crealis commits to implementing and maintaining an effective, documented Quality Management System across all operating entities that provide the structured framework through which the Group:

- Identifies and manages all processes that impact the quality of products and services;
- Applies risk-based thinking to prevent non-conformities and enhance process effectiveness;
- Establishes clear performance metrics and monitors quality performance systematically;
- Implements structured procedures for managing non-conformities, customer feedback, and product recalls through CAPA processes;
- Fosters continuous improvement and drives innovation.

3.2. Product Quality & Safety Management

Crealis commits to applying a rigorous, risk-based approach across its entire value chain, ensuring that every product meets the highest standards of safety, legality, and quality. Non-conformities, customer complaints, and product recalls are managed through structured CAPA procedures, with the objective of protecting consumers and strengthening trust in the Crealis brand.

3.3. Customer & Product Responsibility

In line with ESRs S4, Crealis places customers and end-consumers at the center of its product strategy. The Group ensures that all products are accompanied by clear, reliable, and transparent information regarding safety instructions, certifications, and sustainability characteristics. Crealis actively

identifies and mitigates potential health and safety risks and integrates eco-design and circular economy principles into innovation.

3.4. Compliance & Ethics

Compliance with legal, regulatory, and voluntary standards is a fundamental element of the Group's quality culture. Crealis rejects any practices that may compromise integrity, including counterfeiting, substitution of raw materials, greenwashing, or misleading product claims. Ethical and transparent communication with customers and stakeholders is mandatory, ensuring that product marketing and sustainability commitments are always supported by verifiable evidence.

3.5. Employee Involvement & Training

Employees are central to maintaining the Group's quality and safety standards. Crealis provides structured training programs on Good Manufacturing Practices (GMP), hygiene, HACCP, and quality culture, while also fostering awareness of customer and product responsibility. The Group promotes a culture of accountability in which every employee, regardless of role, understands their responsibilities for ensuring product safety and consumer protection, thereby embedding shared responsibility into daily operations.

3.6. Supplier & Value Chain Responsibility

Crealis extends its quality commitment throughout its supply chain. All suppliers are required to comply with the Group's standards and international requirements on product safety, quality, and sustainability. Regular audits and assessments are conducted to evaluate supplier performance, with corrective actions implemented where necessary. The Group works collaboratively with partners to identify risks, promote innovation, and reduce environmental and social impacts, thereby reinforcing resilience and responsibility across the entire value chain.

3.7. Sustainability Integration

Sustainability is embedded into Crealis' approach to product quality and safety. The Group is committed to reducing the environmental footprint of its solutions, with particular emphasis on recyclability, material safety, and the reduction of carbon emissions. Product development and innovation are guided by eco-design principles and aligned with EU packaging and waste directives. Furthermore, ESG product responsibility indicators are systematically integrated into research, development, and reporting processes, ensuring that the Group's product portfolio contributes to long-term sustainability goals.

4. Implementation, control and monitoring

4.1. Roles and responsibilities

The assurance of quality requires a solid and transparent governance model, grounded in compliance with international standards, clearly defined responsibilities, and the active involvement of all functions. Roles and responsibilities are distributed across corporate bodies and functions as outlined below, ensuring accountability, coordination, and continuous improvement throughout the Group.

Corporate function or body	Roles and responsibilities in Anti-Corruption
Board of Directors of the Parent Company	• Approves the Group Quality Policy. • Oversees the alignment of the Policy with the Group's strategy, ESG commitments, and sustainability objectives. • Ensures that adequate resources are allocated to the implementation of a Quality Management Systems.

Group Quality Function	• Defines and maintains Group-wide Quality standards • Provides technical guidance and support to local entities for system implementation. • Monitors compliance, manages group audits, and oversees the periodic review and update of the Policy. • Consolidates reporting on product quality and safety performance for management and stakeholders.
Site Management and Local Quality Managers	• Implement and maintain Quality Management Systems at local level. • Ensure compliance with Group standards and applicable legal requirements. • Allocate local resources for training, monitoring, and corrective actions. • Report non-conformities, incidents, and performance indicators to Group Quality
Employees	• Comply with all procedures and instructions • Participate in mandatory training and apply Good Manufacturing Practices (GMP) in daily activities. • Promptly report any incidents, near misses, or potential non-conformities through established channels. • Contribute actively to building a culture of responsibility and continuous improvement.
Suppliers & Business Partners	• Adhere to the Group Supplier Code of Conduct and contractual requirements on product safety and quality. • Participate in audits, assessments, and corrective action plans when required. • Collaborate with Crealis to promote innovation, safety, and sustainability across the value chain.

4.2. Quality Objectives & Planning

Crealis Group establishes measurable Quality Objectives that are:

- Aligned with this Quality Policy and the Group's strategic priorities
- Focused on critical quality parameters
- Defined at Group, Site, and Process levels with clear accountability
- Communicated to all relevant personnel and partners
- Monitored through defined metrics and performance indicators
- Reviewed regularly and updated to reflect changing business and regulatory contexts

4.3. Resource Management

- Crealis ensures that adequate resources are allocated for effective QMS implementation
Human Resources: Recruiting, training, and maintaining personnel with appropriate competencies in quality, food safety, manufacturing, and regulatory compliance
- **Infrastructure:** Investing in facilities, equipment, and technology maintaining preventive maintenance programs to ensure equipment reliability
- **Training and Competence:** Providing structured, documented training on GMP/ HACCP (where appropriate), quality procedures, and sustainability principles for all personnel
- **Communication Systems:** Establishing transparent channels for policy dissemination, instruction, and feedback at all organizational levels and with external stakeholders

- **Documentation:** Maintaining comprehensive documentation systems for procedures, controls, testing, monitoring, and corrective actions

4.4. Process Management and Monitoring

Crealis manages key quality processes through:

- **Process Identification:** Identifying and documenting all processes that impact product quality, safety, and compliance
- **Risk Assessment:** Conducting systematic hazard analysis and risk assessment to identify critical control points and monitoring parameters
- **Control Definition:** Establishing preventive controls, critical limits, and monitoring procedures
- **Performance Monitoring:** Implementing continuous monitoring and testing to verify that processes remain in statistical control and products meet specifications
- **Management:** Evaluating and controlling changes to processes, recipes, suppliers, or regulations to ensure continued compliance

4.5. Product Realization and Safety

Product quality and safety is ensured through:

- **Design and Development:** Integrating safety, sustainability, and quality requirements into product design, with consideration for eco-design and circular economy principles
- **Raw Material and Supplier Management:** Evaluating and approving suppliers based on their ability to provide safe, compliant, and quality materials
- **Production and Service Control:** Implementing documented procedures for manufacturing, handling, storage, and transport that ensure product safety and integrity
- **Product Traceability:** Maintaining comprehensive traceability systems that enable rapid identification of affected product batches and facilitate effective recalls if required
- **Product Labeling and Information:** Ensuring that all products are accompanied by clear, accurate, and compliant information regarding safety, composition, use instructions, and sustainability features

4.6. Non-conformities and Corrective Actions

Crealis manages deviations from quality and safety standards through a CAPA process:

- **Identification:** Non-conformities are identified through monitoring, testing, customer feedback, audits, and incident reporting
- **Investigation:** Root cause analysis is conducted to determine the underlying reasons for each non-conformity
- **Containment:** Immediate actions are taken to prevent the spread of non-conforming products and protect consumers
- **Corrective Action:** Systemic improvements are implemented to prevent recurrence
- **Verification:** Actions are verified and documented to demonstrate effectiveness

4.7. Internal Auditing

Crealis conducts comprehensive internal audits to:

- Verify compliance with this Policy and applicable standards (ISO 9001, ISO 22000/FSSC 22000, BRCGS)
- Assess the effectiveness of quality and safety controls
- Identify opportunities for improvement

4.8. Continuous Improvement

Crealis fosters a culture of continuous improvement through:

- Systematic analysis of performance data
- Encouragement of employee suggestions and participation in improvement initiatives
- Investment in innovation and technology to enhance quality and efficiency

5. Policy Communication and Assurance

5.1. Policy Review and Update

The Policy is a living document that must evolve in response to changing business needs, regulatory requirements, customer expectations, and technological developments. It is reviewed at least annually by the Group Quality, in consultation with relevant business units, and submitted to the Board of Directors for approval. Updates may also be triggered by significant regulatory changes, customer requirements, or findings from audits and incident reviews.

5.2. Policy sharing and dissemination

To ensure alignment and awareness, the Policy is widely disseminated both internally and externally. Internally, it is communicated through onboarding, training sessions, intranet platforms, and workplace postings at production sites. Externally, it is made available to customers, suppliers, regulators, and other stakeholders through corporate communication channels, sustainability reporting, and customer engagement platforms. This ensures that all parties, internal and external, are aware of and aligned with the Group's commitments

5.3. Complaint and redress mechanisms

Crealis has established structured mechanisms for receiving and addressing customer and consumer complaints, product incidents, and feedback. Complaints are managed in accordance with documented procedures that emphasize timeliness, transparency, and corrective and preventive action. In addition, the Group maintains confidential channels that allow employees, suppliers, and other stakeholders to report non-compliance or suspected breaches of product quality and safety requirements. All reports are investigated, documented, and followed up to ensure corrective measures are implemented effectively, thereby reinforcing trust and accountability.

Crealis encourages all individuals to report, in good faith and without fear of retaliation, any conduct contrary to this Policy, ensuring the protection of the reporting party in accordance with applicable laws and standards on reporting mechanisms.

6. Appendix

6.1. Appendix A - Correspondence with ESRS Standards

Within the framework established by the Corporate Sustainability Reporting Directive (CSRD), the European Sustainability Reporting Standards (ESRS) provide the regulatory reference for structured ESG disclosures. In this context, this Policy specifically refers to:

- ESRS 2 MDR-P – Policies adopted to manage relevant sustainability issues;
- ESRS S4 – Customer and Product Responsibility, in particular health and safety of end-users, product information, and product stewardship;
- ESRS E5 – Resource use and circular economy, in relation to packaging recyclability and eco-design principles.

ESRS standards	Information	Section	Page	Comments
ESRS 2 MDR-P <i>Policies adopted to manage material sustainability matters</i>	65 (a) a description of the key contents of the policy, including its general objectives and which material impacts, risks or opportunities the policy relates to and the process for monitoring;	1 Introduction	3	
		1.1 Aims of the Policy	3	
		1.4 Relevant impacts, risks and opportunities	5	
	65 b) a description of the scope of the policy, or of its exclusions, in terms of activities, upstream and/or downstream value chain, geographies and if relevant, affected stakeholder groups;	1.2 Scope and Addressees	3	
	65 (c) the most senior level in the undertaking's organization that is accountable for the implementation of the policy;	3.1 Roles and responsibilities	11	
	65 (d) a reference, if relevant, to the third-party standards or initiatives the undertaking commits to respect through the implementation of the policy;	1.3 Reference Principles	4	
	65 (e) if relevant, a description of the consideration given to the interests of key stakeholders in setting the policy;	1.4 Relevant impacts, risks and opportunities	5	
	65 (f) if relevant, whether and how the undertaking makes the policy available to potentially affected stakeholders, and stakeholders who need to help implement it.	3.3 Policy sharing and dissemination	12	
ESRS S4 <i>Customer & Product Responsibility</i>	Disclosure of policies ensuring product safety, quality, and sustainability; product information; prevention of adverse consumer impacts.	2.2 Customer & Product Responsibility 2.6 Sustainability Integration	7-9	Focus on consumer health, safety, product transparency, eco-

				design, and circular economy principles.
ESRS SE5 <i>Resource Use & Circular Economy</i>	Information on policies addressing circularity, recyclability, and resource efficiency in product design.	2.6 Sustainability Integration	9	Describes commitment to eco-design, recyclability, and carbon footprint reduction.

6.2. Appendix B - Definitions

- **Quality Management System (QMS):** A structured framework of processes, procedures, and responsibilities established to ensure compliance with ISO 9001 and Group requirements.
- **Food Safety Management System (FSMS):** A system based on ISO 22000/FSSC 22000 principles that integrates HACCP methodology, prerequisite programs, and continuous improvement to ensure consumer health protection.
- **BRCGS:** The Brand Reputation through Compliance Global Standard (Packaging and Consumer Products), an internationally recognized benchmark for best practices in product safety, quality, and operational controls.
- **Product Safety:** The assurance that products, when used under intended or reasonably foreseeable conditions, will not cause harm to consumers, workers, or the environment.
- **Product Quality:** The capacity of products and packaging solutions to consistently meet agreed specifications, customer requirements, and applicable regulatory standards.
- **Good Manufacturing Practices (GMP):** Established procedures and standards that ensure products are consistently produced and controlled to quality standards appropriate for their intended use.
- **HACCP (Hazard Analysis and Critical Control Points):** A preventive system that identifies, evaluates, and controls hazards significant to food and packaging safety.
- **Traceability:** The ability to track the history, application, or location of materials, processes, and products across the supply chain to enable effective recall or risk management when required.
- **Non-conformity:** Any deviation from defined standards, specifications, or procedures that could impact product quality, safety, or regulatory compliance.
- **Corrective and Preventive Action (CAPA):** A structured process for investigating the root cause of non-conformities, implementing solutions, and preventing recurrence.
- **Eco-design:** A design approach that integrates environmental and safety considerations into product development, with particular focus on recyclability, reduced carbon footprint, and circular economy principles.
- **Customer & Product Responsibility (ESRS S4):** A European Sustainability Reporting Standard requiring companies to disclose how they ensure consumer health, safety, product transparency, and sustainable product stewardship.