

**Quality and Sustainability Policy - Management Commitment and Responsibility****To all employees, collaborators, stakeholders**

Dear colleagues and collaborators,

As the new Managing Director of Greenyard Fresh Italy S.p.A., a member of the international Greenyard Group, I confirm the Management's willingness to pursue the strategic directions started already in 2008 of development, implementation and maintenance of the corporate Quality Policy. From 2019 to date, such policy has been enriched with new Sustainability objectives, shared within the Group and supported by the demands of customers and certification standard as follows:

- **food safety and product quality**, through the company's Quality Management System (QMS) and guaranteed by the certifications obtained<sup>1</sup> **IFS Food and IFS Logistics, QS Wholesale and Coordinator, GlobalG.A.P.** (Chain of Custody).
- **focus and attention to the customer**, a central element in our commercial activities increasingly oriented to the retail market
- **culture of food safety**, understood as shared values, beliefs and standards that influence the mentality and behavior towards food safety inside and outside the organization
- **social responsibility and towards staff**, through **SA8000** certification, obtained in 2010, and the appointment of the **company's Social Performance Team (SPT)**<sup>2</sup>, responsible for ensuring the integration of the company's QMS with all the requirements of the standard, and in particular:
  - Recruitment procedures to ensure the expected **working conditions** by regulating the work eligibility of applicants and ensure the guarantee conditions on the subject of **Child Labor and forced or compulsory labor**;
  - management of Health and **Safety hazards in the workplace**<sup>3</sup> through the Risk Assessment Document, which outlines the steps taken to ensure they are identified and addressed
  - progressive disciplinary practices and measures defined **against discrimination**;
  - providing clarification to staff in a timely manner and at any time, by instructing the Personnel Manager, on their **working hours and remuneration**, the calculation of wages, bonus systems or allowances or incentives to which they are entitled, in accordance with the CCNL and applicable national and local laws, giving them the opportunity to dispute payment, if overdue;
  - compliance with national and EU laws on **freedom of association and the right to collective bargaining**, recognizing the rights of staff and encouraging the election of their representatives, who are part of the SPT;
  - the **application of the company's Code of Ethics**, giving the SPT the mandate to ensure that its contents are transmitted, understood, accepted and verified through audits and/or acquisition of information and documents, by staff and suppliers of transport, outsourced personnel and raw materials, up to and including farms.
- **environmental responsibility**, through the adoption of measures for the protection of the environment at the Trevenzuolo site, such as:
  - the monitoring of **energy consumption** and **greenhouse gas emissions**, in order to reduce them
  - the reduction of plastic and separate **waste** collection
  - **water saving**, with discharge systems in the services with differentiated flows;
- **sustainability**, promoting environmentally friendly practices, such as:
  - the development since 2008 of the **marketing of organic products** under EU control<sup>4</sup>, under its own brand and third parties (since 2016 with the **DEMETER** brands for biodynamic agriculture and **NATURLAND**<sup>5</sup>);
  - specific clauses included in the supply specifications;
  - **Global G.A.P. certification** of the companies from which the raw materials come, which provides for the

<sup>1</sup> Ref.: CSQA Certificazioni Srl. Via S. Gaetano 74 36016 Thiene (VI) Tel. 0445.313011 Fax 0445.313070 e-mail: csqa@csqa.it (ref. Giulio Battistella)

<sup>2</sup> SPT: "Permanent consultation body and place for dialogue within the work environment, with the aim of strengthening the due right to representation". Ref. SAI-SAAS SA8000:2014 and Network Lavoro Etico founded by C.I.S.E. Centro per l'Innovazione e lo Sviluppo Economico (SAAS accredited). Headquarters: Corso della Repubblica 5, 47100 Forlì tel. 0543.38214 Fax 0543.38219 e-mail: info@lavoroetico.it, www.lavoroetico.it (ref. Barbara Faticoni) SAAS Social Accountability Accreditation Services Tel. (212).391.2106 fax: (212).684.1515 e-mail: saas@saasaccreditation.org

<sup>3</sup> Pursuant to the Unified Text on S.S.L. n. 81/2008

<sup>4</sup> Notification (code A649), including authorization to import from Third Countries, whose specifications are reported in a specific 'Management Manual', approved by the Organic Control Body C.C.P.B. (IT BIO 009) recognized by MIPAAF and EU (Code IT-BIO-009), accredited ISO 17021. Ref. Controllo Biologico SRL Viale Masini 36, 40126 Bologna Tel. 051.6089811 Fax 051.254842 ccpb@ccpb.it (ref. Fabrizio Piva)

<sup>5</sup> in accordance with the DEMETER Regulations (Ref. Demeter Associazione Italia - Association of producers, processors and distributors of biodynamic agricultural and food products, owner of the trademark www.demeter.it) and the Naturland Guideline Production standard - vers.5 2020 (Ref. Naturland - Association for Organic Agriculture and Naturland Zeichen GmbH 82166 Gräfelfing, Bavaria, owners of the trademark www.naturland.de)

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Share capital € 1.500.000,00 fully paid / Subject to the direction and control of Greenyard Fresh Holding NL BV - Sole Shareholder

Verona Register of Companies, Tax Code and VAT No.: 01728420231 / R.E.A. 193620 / B.D.N.O.O. 0085277

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application of **Integrated Production Regulations**, the use of biological and agronomic control methods and the implementation of **Environmental Protection Plans**, through regular maintenance of vehicles, proper waste management, creation of refuge areas to promote biodiversity and the presence of pollinators and auxiliaries in the agro-ecosystem.

Therefore, having completed in little more than 10 years the path that has led our company today to be equipped with the highest standards to ensure customers and consumers a high reliability of **Quality, Food Safety and Sustainability** of services and products offered, a fundamental requirement of its business strategy and customer satisfaction, the Management **confirms** the Company Policy **and renews** it in the following **specific objectives for the relevant functions**:

### QUALITY, FOOD SAFETY AND ENVIRONMENT:

|   | topics <sup>6</sup> | Areas <sup>7</sup> |
|---|---------------------|--------------------|
| 1 Define the methods for recording the requirements established in contracts with the aim of <b>ensuring that customers comply with the specifications of the products supplied</b> .   | Q C                 | Dir, Com, Q        |
| 2 Increase competitiveness against competitors in foreign markets, thanks to sustainable supply chain policies with suppliers, in order to <b>build customer loyalty in large-scale distribution abroad</b> .   | C                   | Dir, Com           |
| 3 Pay attention to the promotion and communication of the company and its activities, (through B2B meetings, Fairs and Conventions of the sector, etc.), in order to explore new markets and acquire new customers.   | C                   | Com, Q             |
| 4 Evaluate the degree of customer satisfaction through the analysis of data on disputes with customers and suppliers, aimed at <b>reducing the number of returns</b> .  | C                   | Com, Q             |
| 5 <b>Achieve and maintain the certifications</b> of conformity of the QMS, through accredited Control Bodies, to standards expressly or implicitly appreciated by customers, respecting their requirements.   | Q                   | Dir, Q             |
| 6 Ensure compliance with the <b>provisions of national and EU food safety regulations and requirements, keeping the required documentation updated</b> .  | Q                   | Dir, Q             |
| 7 Maintain and/or develop partnerships with suppliers to implement techniques that reduce chemical inputs, such as Integrated Production, Organic Production, or other <b>actions in favor of Sustainability</b> .  | Q A                 | Dir, Q             |
| 8 <b>Promote to suppliers the culture of food safety and quality standards</b> , with particular reference to the contractual requirements of foreign customers, defining the specifications in the supply specifications.  | Q C                 | Q, Com             |
| 9 <b>Promote standards of Good Practices to farms</b> , particularly where contractually required by customers, defining the specifics in the Supply Specifications.  | Q C                 | Q, Com             |
| 10 Ensure the safety and healthiness of marketed products, through a monitoring plan <b>aimed at the maximum possible reduction of non-conformities</b> due to contamination exceeding the limits allowed by residues of chemicals and microbiological agents, as well as of foreign bodies.                  | Q                   | Mag                |
| 11 Ensure constant monitoring, through the <b>verification of prevention systems, of threats to the protection of products</b> that may cause deliberate contamination and other acts of sabotage or <b>food fraud</b> .  | Q                   | Mag                |
| 12 <b>Retaining the loyalty of staff</b> , focusing on the competence and technical updating of human resources, through a registered <b>training program</b> for employees and collaborators, particularly on <b>quality and product authenticity</b> , food safety, the environment and regulatory aspects. | Q A                 | Mag                |
| 13 Arrange for the <b>monitoring of the main consumption of resources and environmental impacts</b> , in order to identify and promote more advantageous and environmentally friendly actions and practices.  | A                   | Amm, Mag           |
| 14 Have suppliers from whom the Company regularly and/or more critically gets supplies sign <b>specific specifications that include all Quality and Environmental requirements</b> .  | Q A                 | Amm, Q             |
| 15 <b>Verify and monitor</b> compliance with all aspects of Quality and Food Safety (culture and requirements) within the company and with personnel, evaluating negative reports and non-conformities that may emerge.   | Q                   | Dir, Q             |

### SOCIAL RESPONSIBILITY objectives:

|   |   |            |
|---|---|------------|
| 16 Raise awareness of employees and suppliers <b>on the contents of the Company Policy, Code of Ethics and SA8000 standard</b> , involving <b>stakeholders</b> (through <b>identified external monitors</b> ) <b>on the results achieved</b> .  | E | Amm, Q     |
| 17 Facilitate internal communication for its employees and collaborators on the subject of Social Responsibility and national and international standards on workers' rights, promoting <b>training activities and formalized meetings</b> of the SA8000 Team.  | E | All /Tutti |
| 18 Verify and <b>monitor</b> compliance with all aspects of Social Responsibility (child labor, forced or compulsory labor and health and safety, freedom of association, right to collective bargaining, discrimination and disciplinary practices and measures, working hours and remuneration) within the company and with personnel, paying due attention to any negative reports and non-compliance that may emerge. | E | Dir, Amm   |
| 19 Have the Company's regular suppliers sign specific Terms of Reference, which include SA8000 Social   | E | Amm, Q     |

<sup>6</sup> Legend, Topics (concerned): A = Environment, C = Commercial, E = Ethics, Q = Quality

<sup>7</sup> Legend, Areas (involved of company): Dir = Management, Com = Commercial, Q = Quality, Amm = Administration, Mag = Warehouse

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Accountability requirements and labor standards, and verify the degree of compliance through the acquisition of targeted information and the execution of audits, based on risk assessment, including farms and service providers in company monitoring, giving priority to the most critical suppliers.

- 20 Commit to the continuous implementation of the SA8000 Standard through concrete company actions, using the **Social Fingerprint self-assessment** tool, to assess performance improvement through the resulting scoring system.

E Amm, Q

Consequently, the Management of **Greenyard Fresh Italy**:

- **approves today the present edition of the Quality and Sustainability Policy**, with the intention of keeping it active and invites the Managers of the various sectors (Management, Commercial, Quality, Administration, Warehouse) to effectively apply the Policy and the company's QMS;
- **delegates to the competent functions specified the realization of the Objectives** of strategic interest for the relative areas (**Quality, Environment, Ethics**), aiming at the achievement of such Objectives on the basis of the measurable **performance indicators (KPIs) established in the Objectives Plan, which will be submitted annually to the Management during the Review**;
- **ensures**, through ordinary and extraordinary management, the necessary **availability of resources, functions in the organization chart and adequate means**, not only for the maintenance of the QMS, but for its further development and to orient the Organization towards new objectives, redefining Procedures and methods that the personnel must apply in order to behave in conformity with the Policy;
- Instructs the **Quality Management System Manager (QMS) and the SA8000 Manager** to ensure by all possible means, whenever appropriate and necessary, the **diffusion and dissemination of the Policy to all employees and collaborators, as well as to suppliers of products, services and outsourced personnel, clients and consumers, bodies, monitors, representatives of interested parties who are members of the SPT and other stakeholders**, pointing out the degree of **knowledge and understanding of the Policy and the Culture of Food Safety and Social Responsibility** and to evaluate its compliance and application;
- mandates the **Quality Department to effectively and promptly communicate to relevant personnel all relevant information relating to food safety, quality and authenticity of the product** must be, as well as to collect information and develop actions to be promoted, at headquarters and at suppliers, aimed at monitoring and/or reducing environmental and social impacts;
- **sets measurable parameters (Indicators)** for each of the objectives in order to guarantee their achievement and consistency with the Quality Policy, as a tool for constant monitoring, periodic evaluation and review of their contents, and identification of any new objectives for the following year, for which the relevant indicators are to be set;
- **assesses, on the occasion of the Reviews, the results of the Performance Indicators** in order to verify the effectiveness of the QMS and the certification standards adopted, the objectives and their adequacy, the existing suppliers (based on evaluation criteria that take into consideration their criticality) on which to set the monitoring activity for the following year. In this context, the examination of non-conformities, any changes in legislation or standards and any other fact relevant to the QMS, will give rise to corrective actions, or revisions of the QMS, which may be necessary for continuous improvement;
- **undertakes to communicate the results achieved** during the year and to promote suitable dissemination initiatives to make its contents available and understood in the most effective ways and forms, both within the company and externally: to Function Managers, employees and collaborators, the HACCP Team, the SPT and interested parties, where requested;

Trevenzuolo, 27<sup>th</sup> January 2022

for the Management

Maicol Galeati

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