Menz&Gasser Group

COMPANY POLICY

QUALITY, ENVIRONMENT, OCCUPATIONAL HEALTH & SAFETY, FOOD & SOCIAL HEALTH & SAFETY





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Policy and General Objectives

Menz&Gasser was established in Lana (Bolzano) in 1935 as a fruit processing company and soon became specialised in making high-quality jams and fruit-based products.

The Menz&Gasser Group is composed by two companies Menz&Gasser Spa and Menz & Gasser Asia (KL) Sdn Bhd.

Menz&Gasser Spa (initially founded in 1935) is rooted in Italy and has its registered office in 38050 Novaledo (TN), Zona Industriale C.F. and VAT number: 00230870222 and is registered in the ordinary section of the Business Register held by the Trento Chamber of Commerce with the REA number TN- 83062. Menz&Gasser Spa has two production plants, one in 38050 Novaledo (TN), Zona Industriale 1 and one at 37058 Sanguinetto (VR), Via Roma 23.

In 2015, Menz & Gasser Asia (KL) Sdn Bhd (1134042 - U) was founded with registered office and production site in Malaysia at 45600 Bestari Jaya, Selangor.

Menz&Gasser since its foundation, Menz&Gasser has based its activities and company policies on a set of principles and ethical and operating values which have formed the backbone of the company's management and development over the years, focussing on

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social accountability, while respecting all stakeholders and the community, and complying with the laws of countries where it operates.

Menz&Gasser is an innovative company that creates and produces goods and services to meet customer expectations, becoming a European leader in the manufacture and packaging of jams, flavourings, sauces and sweet and savoury semi-processed products. To successfully tackle these complex aspects, Menz&Gasser believes it is particularly important to clearly define the set of values that inspire it and which it intends adopting.

Developing, producing and distributing healthy products that conform to established quality standards; growing with a commitment and determination necessary to offer the best to customers and consumers. The Customer is the judge of our products and customer satisfaction measures our added value.

At Menz&Gasser, the creation of shared value means setting medium/long term objectives and also guarantees solid annual results, through investments that bring benefits not only to the company, but also to local communities where it operates, with the maximum respect for the environment.

Creating shared value is the guiding principle of our company strategy and a fundamental factor of our success. Creating shared value means ensuring the company's success in the long term, being able to tackle global challenges with a positive mindset.

"Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs.""

[Brundtland report, World Commission on Environment and Development:, 1987]

This concept steers Menz&Gasser 's actions in society and drives the company towards taking an active role in the cultural and social promotion of the area where it is established, and in looking after its environment.

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As a result, the Company invests heavily in energy saving, in reducing its use of natural resources and in producing energy that is clean and renewable, obtainable from local sources and for the site in Novaledo, the environmental management system is certified ISO 14001:2015. The Company is also committed to complying with the food safety standards of FSSC22000, certified in all the M&G sites.

The Company has obtained the following product accreditation: Organic, Fairtrade®, ABM IGP, RSPO, HALAL, KOSHER and Qualità Vegetariana-VEGAN.

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The Company's general objectives are:

- ✓ achieving positive economic results, to enable the Company to continue investing in new technologies;
- ✓ having knowledge of and complying with current and future legislation on health and safety, the environment, product protection and ethics;
- ✓ promoting information and training activities for staff, with specific reference to their duties, so they can carry out their tasks safely and become accountable for occupational safety, environmental protection, ethics, food safety and quality;
- ✓ promote internal and external communication;
- ✓ supporting continual improvement;
- ✓ aiming for the satisfaction of staff, considered a strategic resource, by respecting and sharing the fundamental principles of the code of ethics
- ✓ identifying hazards and assessing risks for food safety, personnel and the environment, in order to adopt suitable solutions to prevent accidents, occupational disease, pollution, food-related illness and complaints, adopting all improvement actions identified;
- ✓ analysing internal audit outcomes, discussing them in periodic meetings and
 periodically reviewing the policies, integrated management system, risk assessment
 report, HACCP and document analysing environmental aspects, assessing their
 consistency, adequacy and applicability.

The company and all staff, sharing these objectives, are involved in and focussed on taking an active and constructive role that is consistent with the objectives.

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Food safety policy

Menz&Gasser has always considered the quality and food safety of its products as an absolute priority. We are convinced that ensuring the utmost reliability and guaranteeing high safety standards is the only way to gain the trust and loyalty of our customers and consumers.

This is why we continually invest in the latest machinery and technologies and in the development of processes, procedures and controls capable of guaranteeing the utmost safety during all stages of the production process, as demonstrated by the food safety system certification obtained over the years.

Guaranteeing the utmost food safety, in compliance with statutory, regulatory and internal company regulation, is a fundamental for us - so we can compete successfully on the global market. To achieve its food safety objectives, Menz&Gasser:

- traces the origin of raw materials;
- ✓ guarantees ingredients free from GMO;
- ✓ quarantees the freshness and properties of products for even longer:
- carries out 100% controls on incoming raw materials and on outgoing production lots.
 These may be chemical/physical, sensory, microbiological and/or document controls depending on the risk assessment and product criticality;
- carries out screening to guarantee the use of very high-quality fruit and removal of harvesting residues;
- ✓ guarantees allergens management through all production's steps, to ensure the cross-contamination absence and guarantee gluten-free productions for celiacs;
- ✓ uses metal detectors to guarantee the absence of metal parts;
- checks products in glass jars using an X-ray machine to identify any foreign bodies without, however, modifying the products;
- promote a culture of quality and food safety;
- implement a food defense and fraud prevention plan.

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Occupational health and safety policy

"Everyone must commit to occupational health and safety, not only through safe behaviour and carrying out work properly, but also by continually creating the most appropriate conditions for this to take place"

Management is committed to establishing an appropriate document system that ensures each worker is aware of the importance of conforming to the policy, safety procedures, safety management system requirements, individual safety obligations, the actual or potential consequences of their work, their own safety and that of other workers, and benefits of improving their own performance, as well as their own role and responsibilities in order to conform to the security policy and potential consequences of deviations from specific operating procedures.

The Company bases its policy on a "zero accidents" objective, and aims to provide a safe working environment that promotes accident prevention and minimises exposure to risks for health, in order to eliminate occupational disease and accidents, with particular reference to the specific risks of processing carried out in the production department and at work places where the Company operates.

Objectives are to:

- reduce and eliminate occupational disease and accidents;
- ✓ give all staff a safe, comfortable working environment and work tools with an adequate level of technological innovation;
- reduce potential and actual cases of accidents, by taking corrective and preventive actions:
- ✓ promote the involvement of safety officers in internal audits, meetings, inspections and health and safety prevention training.

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Environmental protection policy

Menz&Gasser seeks solutions to balance its company growth with environmental protection. The plan to transform it from an ordinary firm to an eco-sustainable company has led to investments of over 10 million euros in the last 10 years. Since the onset, the company has had a special relationship with local areas, from Alto Adige - where it was established - to Trentino - which later became the location for its sites. The values these areas convey to those who live there are reflected in the actions of Menz&Gasser , targeting the control of environmental impact.

Since 2013, the company has adopted its Environmental Management System conforming to ISO 14001, certified for its Novaledo site.

The aims of the company in this field are to conserve the environment where it operates, and focus on:

- reducing the use of energy and natural resources;
- ✓ reducing the production of waste, maximising re-use and recycling through the generation and use of alternative energies;
- using clean, renewable sources.

The company promotes workers consultation and participation for activities related to the prevention and protection of risks, as well as the improvement of the management system for health and safety at work and the environment.

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Social policy and ethics

Menz&Gasser endorses the principles and goals of the UN's Declaration of Human Rights and of the ILO (International Labour Organisation). To this end, Menz&Gasser has opted for the model proposed by Ethical Trading Initiative (ETI, www.ethicaltrade.org), undertaking to guarantee its adoption and continual improvement.

Everyone who works and operates at Menz&Gasser , without distinction or exception, is committed to observing these principles and to having these principles observed, as part of their duties and responsibilities.

All actions, operations and negotiations carried out and, in general, behaviour adopted by people in their work must be based on applicable legislation and internal procedures, particularly the company management system and company procedures.

Achieving the ethical objectives we have identified is guaranteed through direct training to raise awareness among all those involved of the existence and contents of this Company Policy. Engagement is essential for sharing the values in this Code with all recipients.

Since 2010, the company has been a member of Sedex (Supplier Ethical Data Exchange), to maximise and share ethical and social performance with stakeholders.

In carrying out its activities, Menz&Gasser:

- conforms to all requirements of these codes of ethics, and makes its commitment to staff and business partners public;
- ensures that all staff comply with these ethical principles and rules of behaviour in business and in their dealings with third parties;
- endorses the UN's Universal Declaration of Human Rights and ILO's Fundamental Conventions and does not tolerate the use of child labour at its sites or at the sites of Suppliers and Subcontractors;

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MENZ & GASSER S.P.A.



- ensures that all staff are informed so that they may avoid conflicts of interest, or avoid business dealings that may constitute a conflict of interest, in both professional relations and personal activities;
- ✓ guarantees that all business operations are recorded accurately and in full, in compliance with best practices on the precision and clarity of reports at both an external and internal level; to this end, all staff are required to comply with the internal procedures of Menz&Gasser on control and reporting at all levels.
- undertakes to take action so that human resources are managed in compliance with the principles set out in these Ethical Principles and in applicable legislation; in particular, the Company does not permit or tolerate any form of discrimination concerning gender, sexual orientation, disabilities, religion, race, nationality, ethnic origin, against and among its staff.

Bribery, unlawful favours, collusion, the solicitation - directly and through third parties - of personal and professional benefits for oneself, for Menz&Gasser or for others, are strictly forbidden and may be punished by sanctions.

The Company does not tolerate any form of bribery or extortion, blackmail or other forms of similar payment, made or received by third parties.

In carrying out work or when representing Menz&Gasser, it is not permitted, even if not intended to obtain a benefit or advantage, to pay for or offer, directly or indirectly, presents, payments, material benefits or other advantages of any entity to customers, suppliers, public officials or third parties in general.

Business courtesy, such as gifts or hospitality, is permitted when of a modest value and such that it will not affect the integrity or reputation of one of the parties and may not be interpreted, by an impartial observer, as intended to unduly obtain benefits. In any case, this type of expenditure must always be authorised by the appropriate company department and adequately documented.

Human resources are essential and fundamental for Menz&Gasser.

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Smart food, happy people

The Company offers equal employment and professional growth opportunities for all, ensuring that everyone is treated fairly based on merit, without any discrimination. Menz&Gasser undertakes to develop the expertise and competencies of its staff so that the energy and creativity of each person in their work can be fully expressed to achieve their potential.

The Company adopts criteria based on merit, expertise and which are strictly professional as regards any decision concerning a staff member. The Company recruits, employs, trains, pays and manages staff without any discrimination.

Menz&Gasser protects the physical and mental wellbeing of staff, respecting their personality and ensuring they are not subject to any unlawful influence or undue discomfort.

The Company expects its staff to reciprocate fully to maintain a working environment that respects the dignity, honour and reputation of everyone, and to take action to prevent abusive or denigratory behaviour.

Each staff member is entitled to work in an environment free from discrimination concerning race, class, age, nationality, disability, language, religion, gender, ethnic origin, trade union or political or any other association.

The company's objectives, also on a social level, are:

- to ensure that the ethical principles are shared both in the company and among stakeholders;
- ✓ to promote social projects supporting the local area;
- ✓ to promote fair trade products (e.g.: Fairtrade®, RSPO, UTZ,.);
- to support volunteer organisations helping those in need, providing products that are non-conforming in appearance.

Management is strongly committed to establishing a company organisation to achieve and consolidate the commitments outlined above.

Novaledo, 31 May 2022

Matthias G