

ALUFLEXPACK NOVI d.o.o. Corporate Manual for the implemented integrated systems:

- Quality Management ISO 9001:2015
- Packaging Manufacturing BRCGS Issue 6/2019
- Environmental Protection ISO 14001:2015

for the following manufacturing plants:

- 1. Headquarters and Zadar Manufacturing Plant: Dr.F.Tuđmana 25, 23241 Poličnik, Croatia;
- 2. Umag Manufacturing Plant, Ungarija 40b, 52470 Umag, Croatia;
- 3. Drniš Manufacturing Plant, Stjepana Radića 65, 22320 Drniš, Croatia

and also includes:

- Chain of Custody Certification FSC-STD-40-004 V3-0 for Umag Manufacturing Plant
- ASI Performance Standard v2 December 2017 for Drniš Manufacturing Plant

More information at www.aluflexpack.com e-mail: afp@aluflexpack.com

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Issue 11 / November 2020



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1. Organization's and Business Operations Context

Aluflexpack Novi - an international flexible packaging manufacturer with over 35 years' experience. The Aluflexpack Group is an independent and competitive group, which has been successfully supplying the leading European manufacturers and global brands with packaging fully tailored to customer requirements. Since November 2012, it has been a member of the Montana Tech Components AG Group with a view to strengthening and further applying its know-how in the area of the aluminium industry and it is on its way to becoming one of the leading flexible packaging manufacturers.

Please find more information at:

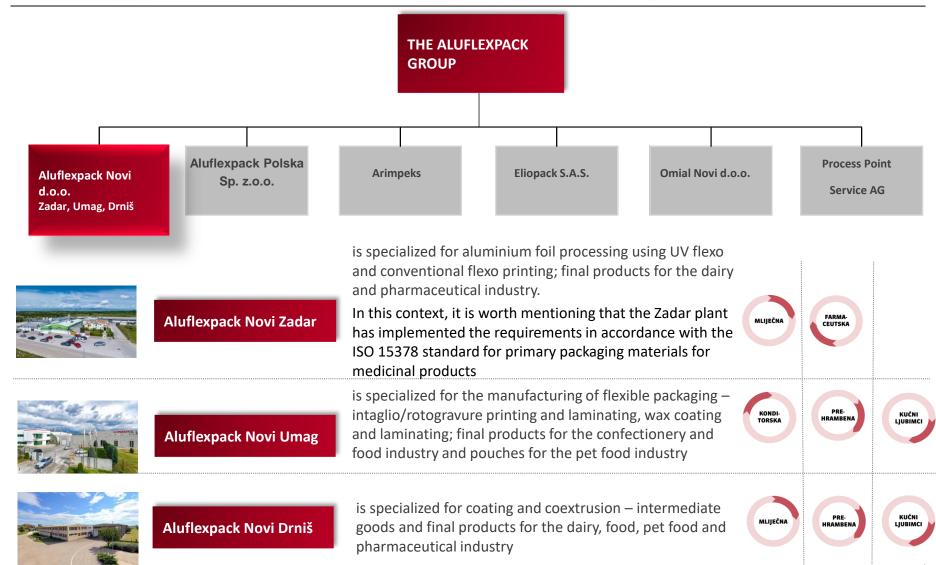
https://www.aluflexpack.com/

- •The AFP Management Board and all company's employees believe that it is only with high and constant product quality and safety and by taking care of sustainability and employee and environmental protection that they can meet all customer needs and requirements.
- •The Rules of Procedure incorporate the issues of product quality and safety, product health safety, taking care of employees and environmental protection, health and safety and contain all fundamental determinants of the quality management system, product safety and environmental management system implemented at the AFP company.
- •The scope of validity of the ISO 9001, HACCP/BRCGS, ISO 14001, SMETA/Sedex and Ecovadis systems refers to Aluflexpack novi d.o.o. in its plants in Zadar, Umag and Drniš with a view to consolidating the system in all manufacturing plants of the AFP Group.
- •The CEO is included in the development of the quality management strategy, he appoints process owners and approves the Rules of Procedure and policies relating to quality, safe and legally compliant products, human and labour rights, workplace safety, health and environmental protection. He also examines and evaluates the quality management system, as well as those relating to safe and legally compliant products, human and labour rights, workplace saftey, health and environmental protection. He is responsible for setting up a culture of safe and quality products, for setting targets and clear success measures, for communicating them with the personnel in charge and reviewing them at least once a year. Revision procedures are performed in accordance with the ISO 9001, ISO 14001 and BRCGS, SMETA/Sedex, Ecovadis system requirements.

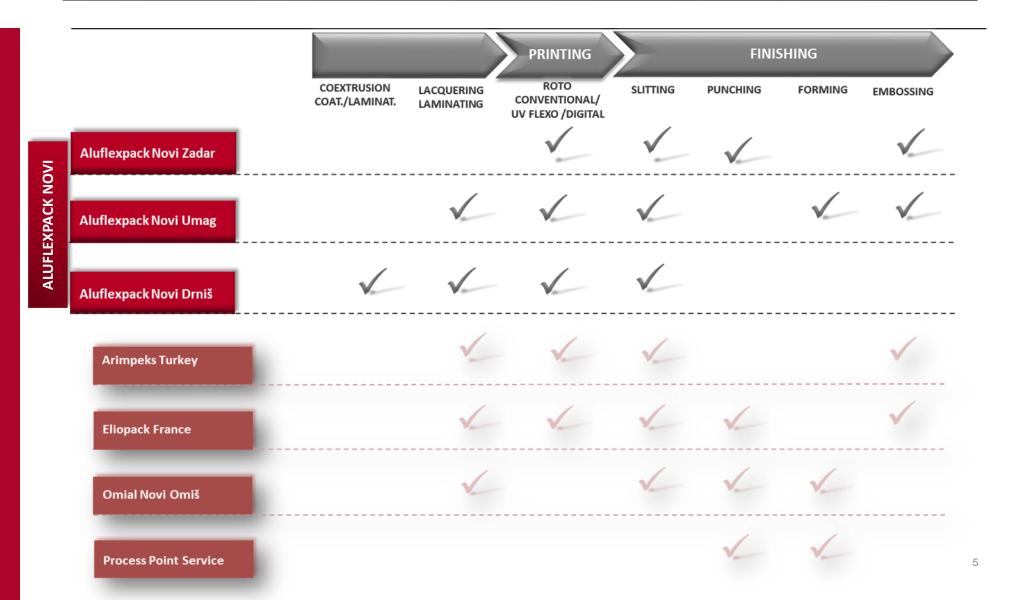














The Aluflexpack Novi Company has a common quality management system. All plants are connected with a common protected information system.

Data are transparent and available at all times and from each location and are shared by all three plants. Thus Aluflexpack Novi has common umbrella processes, a common database for documentation and all control systems (among others, manufacturing, laboratories, warehouses, audits and other inspections, correction and prevention actions), computer-supported or information systems that impact product quality, health and technical safety, as well as financial values. Work instructions and records are specific and aligned with the needs of the process taking place at the corresponding location.

The same requirements of the implemented standards apply to all warehouses of the Aluflexpack Novi company. Our own transport vehicles are used for the goods transport among the AFP Novi d.o.o. plants; this is why final products stored within our company are not considered to be merchandise, because they are subject to our controlled conditions.

The AFP company's basic processes are described on the AFP portal and they are interconnected <u>AFP processes – main scheme</u>.

Process Name	ZADAR	UMAG	DRNIŠ
Finance, Accounting, Risk Management	x	x	x
Graphic preparation	х	х	/
HACCP	х	x	x
IT	х	х	x
Research and Development	х	x	x
Quality Control	х	х	x
Controlling	х	x	x
Logistics	х	x	x
Human Resources	х	х	x
Procurement	х	х	/
Maintenance	х	x	x
Quality Assurance	х	х	x
Planning	х	х	x
Customer Support	х	x	/
Sales and Marketing	х	х	/
Manufacturing	х	х	x
Management Board's Office	х	Х	X
Workplace Health and Safety, Fire Protection and Environmental Protection	x	x	x



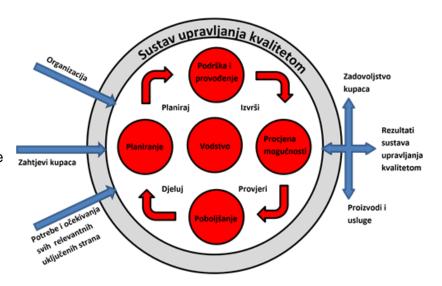
- The Quality Assurance Department Head is responsible for the functioning of the quality management system in accordance with the ISO 9001:2015 requirements and also for the HACCP and BRC systems. He or she reports to the Management Board about the system status and coordinates the activities of the system planning, establishing, supervision and modification. He or she is also responsible for the issuance of and amendments to the quality-related rules of procedure and plans and supervises the implementation of in-house audits. At each location, team leaders and members have been appointed according to the adopted proposal for the QMS Team Leaders and Members; they participate in the annual revisions of the HACCP plans and are included in the in-house training and inhouse audit procedures.
- The Management Board representative for social and environmental protection is responsible for the functioning of the human and labour rights, work safety, health and environmental management system in accordance with the ISO 14001:2015, Social and Health Protection System requirements. He or she reports to the Management Board about the status of the social (human and labour rights and healthy and safety) and environmental protection system. He or she coordinates all activities related to social and environmental protection through planning, establishing, supervising and modifying the social environmental management system. At each location, the 14001 team leaders and members have been appointed according to the adopted proposal for the 14001 Team Leader and Members; they are included in the in-house training and in-house audit procedures.
- At each location, the ASI and/or FSC member team leaders and members have been nominated with appropriate responsibility and authority for the implementation of the ASI and/or FSC standard. To support the implementation of standard and to develope understanding and knowledge of standard in house trainings and audit procedures are included.
- Heads of business units are responsible for the implementation of the regulations and instructions stipulated in these Corporate Manual
 and the consequent documents of other levels (procedures, work instructions, forms). The Quality Manual present an obligation for
 each employee and a guideline indicating the way in which individual phases of the business processes are to be conducted.
- The company's organizational structure can be found on the internal AFP portal as Appendix III to the Regulations on the Organization and Systematization of Jobs of 19th October 2020: <u>organizacijska struktura društva</u>



- The systems related to quality management, technical and health safety of the product, environmental protection, human and labour rights, workplace safety and health have been established and maintained as the processes, in which customer requirements and the requirements of other stakeholders present the input value, and the product, which is in conformity with those requirements, is the output value, that is, the result of the processes. The components of the integrated system are smaller, interconnected processes. A process owner has been appointed for each of those processes; he or she is responsible for turning the received input values into the planned output values through process implementation.
- We conduct certain measurements for the measurable processes, we analyse the received data, produce overview reports etc. These are our bases for determining process effectiveness and efficiency, setting new measurable targets (plans) and implementing continuous improvements.
- The basic processes of the AFP company, as well as all current versions of work instructions and records, can be found on the AFP portal:

Organization and documentation Aluflexpack Novi Umag Plant Organization and documentation Aluflexpack Novi Zadar Plant Organization and documentation Aluflexpack Novi Drniš Plant

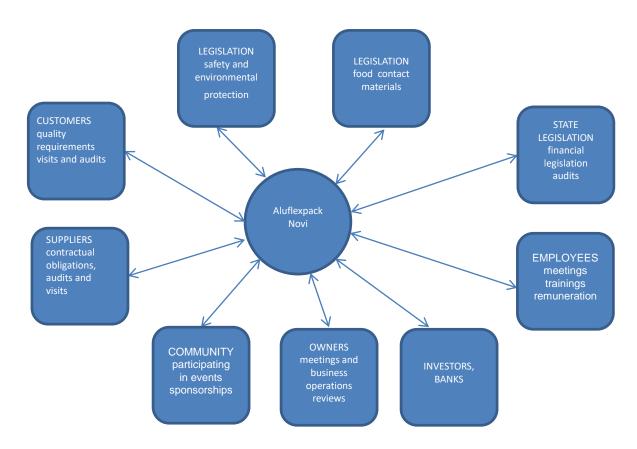
 The management systems are based on the Deming-Shewhart cycle Plan Do Check Act, shown in the figure: In accordance with the mentioned process approach, we ensure continuous improvement of quality and overall organizational business processes.



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• Due to possible impacts on consistent delivery of products and provision of services that meet customer requirements and the requirements of laws and regulations, we monitor and review the information with the following stakeholders:



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POLICY – Statement of principles and intentions adopted at the level of Aluflexpack Novi. It has been posted in writing on all notice boards within the Aluflexpack Novi plants.

Quality and Food Safety Policy

Stable product quality is one of the most important contributions to our success. We can ensure it by:

- developing personal and social awareness, fostering a product safety and quality culture and encouraging employee training
- continuous investments in line with the latest scientific and technical achievements in the industry
- provide human and financial resources required for the production of safe food packaging material
- ensuring customers' trust in good quality and safe products in compliance with all applicable laws and legislations related to the manufacturing of high hygiene risk food contact packaging
- running the manufacturing process under planned and well-supervised conditions with constant control of the documentation conformity with the effective specifications and other environmental requirements.

Occupational Health and Safety Policy

We are also determined to follow the occupational safety and health policy to continuously work on:

- commitment to provide safe and healthy working conditions for the prevention of work related injury and ill health
- meeting the legal requirements in the area of workplace health and safety
- developing and maintaining health and safety plans that clearly determine the measures to be taken for the protection of employees and other stakeholders like visitors, suppliers, contractors and the local community
- ensuring adequate and competent supervision of all activities of the company, in order to eliminate hazards and reduce OH&S risks
- developing awareness through informing and training our employees, contractors and visitors on all aspects of environmental protection and workplace safety and health.
- Health and safety is not only definition for physical but should integrate also mental wellbeing in order to adopt more holistic understanding of health and safety.



Environmental Policy

By adequate process planning and management, we give special attention to protection of environmental and communities in which we operate. We do it by following guiding principles at all locations and communities:

- operating in complinace with applicable environmental laws and global EHS standards.
- improving our environmental protection management system,
- reducing adverse influences through solvent recovery,
- saving natural resources through selective waste collection and other development projects.

Social Compliance and Ethics Policy

- In hiring people or conducting our business we comply with applicable laws and regulations with emphasis on the importance of honesty, integrity and fairness.
- We communicated AFP Novi Code of Conduct with all employees, but aslo through the supplier chain when conducting business. Code of Conduct is a statement of principles and values that establishes set of expectations and labour standards like Child labour, Forced labour, Working hours, Non discrimination such as race, religious or political belifes, disability, gender, maternity status, age, etc.
- Any kind of financial or non-financial fraud will not be tolerated, including any forms of bribery, corruption, extortion or similar activities.

Sustainability Policy

• Our approach to sustainability is focused on three different areas of stakeholder interest: Environmental, Social and Economic impacts. In Sustainability Report we will communicate to our stakeholders following the guidelines produced by the **Global Reporting Initiative** (GRI), and will become public on website starting with Report for 2019.



Responsible Sourcing Policy

- To support more sustainable packaging solutions our strategy is to by responsibly sourced material from socially and environmentally responsible suppliers, which have to be confirmed and certified by third parties.
- For rotogravure paper printing solutions we are certified according to Chain of Custody certification for Forest Stewardship Council (FSC) wood based material.
- We are member of Aluminium Stewardship Initiative (ASI) for aluminum materials and our intention is to certified to the ASI
 Performance Standard and ASI Chain of Custody Standard and to supply our customer using certified aliminum from responsible
 sourcing.

FSC Policy

Aluflexpack Novi plant Umag commits to the FSC values as defined in FSC-POL-01-004 by signing a self-declaration that the organization is not directly or indirectly involved in the following activities:

- illegal logging or the trade in illegal wood or forest products:
- violation of traditional and human rights in forestry operations;
- destruction of high conservation values in forestry operations;
- significant conversion of forests to plantations or non-forest use;
- introduction of genetically modified organisms in forestry operations;
- violation of any of the ILO Core Conventions, as defined in the ILO Declaration on Fundamental Principles and Rights at Work, 1998.

FLEX PACK

Quality, Product Safety, Environmental Protection and Sustainable Development Policy

Our goal is to maintain and improve the ISO 9001:2015, BRCGS issue 6:2019 Packaging Materials, and ISO 14001:2015 systems, SMETA/Sedex and Ecovadis, with which we achieve additional progress and customers' trust in AFP products.

In line with the new trends in sustainable development, AFP has set objectives of managing key impacts on the society, environment and economy.

We would like to highlight some of the objectives that we have achieved and which we are still developing and improving:

- ECOVADIS silver medal for CSR (Corporate Social Responsibility) rating
- Active cooperation in global organizations that work on improving circular economy in the use of flexible and aluminium packaging
 - Membership in the CEFLEX organization (a circular economy for flexible packaging)
 - Membership in the ASI organization (Aluminium Stewardship Initiative)
- Successfully audited AFP Novi plants in accordance with SMETA 4 Pillar requirements
- publication of Sustainable Report, including target for CO2 footprint and LCA calculation for the AFP Group
- cooperation with customers and suppliers on projects that include development of sustainable packaging (replacing multiple layer foils with single layer foils with high barrier properties wherever possible)

This Policy is the basis for defining our goals in the areas of quality, technical and health safety of our products, environmental protection, occupational safety and health, human and labour rights, and other sustainable development goals.

Igo	Arbanas, CEO	November/2020



2 Leadership

The adopted **Quality and Food Safety; Environmental, OH&Safety, Social&Ethics, Sustainable, Responsible Sourcing and FSC Policy,** presents the guidelines for the work, reasoning and behaviour of all employees. In accordance with the quality policy, the CEO sets annual measurable quality targets. These targets can be achieved by hard work of all employees led by the CEO. The CEO is unreservedly committed to the development, certification and maintenance of efficient management systems.

To that end, the CEO especially takes responsibility for the following activities:

- Motivating and enhancing the satisfaction of employees and customers;
- Providing resources and ensuring mutual communication;
- ©Conducting management system evaluation
- **©**Encouraging continuous improvements in all segments of the company's operations.

The success of Aluflexpack in general depends on meeting the present and future needs and expectations of the customers, authorities in charge and the interested public. AFP strives to exceed customer expectations and subordinates everything to that goal. To define customer needs and expectations, AFP:

- Oldentifies and evaluates the competition in its market;
- ODetermines the key characteristics of the product quality;
- Oldentifies the opportunities, weaknesses and future competitive advantages;
- **©**Determines the risks that can have an impact on the product quality, that is, on customer satisfaction. In that regard, activities related to risk assessment are undertaken.

The roles of responsibilities and authorizations (substitutions) at AFP have been defined in accordance with its Organizational Chart.

Process owners are responsible for good process implementation. Responsibilities and authorizations have been defined for all management system processes in the corresponding procedures.

All company's employees are responsible for the quality of their work and consistent adherence to the documented system information.

Responsibilities and authorizations of all employees have been determined by job descriptions, Management Rules of Procedure, the documented system information and CEO's decisions.

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3 Planning

- Based on the Quality and Food Safety; Environmental, OH&Safety, Social&Ethics, Sustainable, Responsible Sourcing and FSC Policy, , the CEO sets annual quality, product safety, social, environmental protection and sustainable development targets. The targets are set at the level of the whole company.
- Annual management system targets are concrete and measurable, set to introduce new or improve the existing products, processes or systems. Annual measurable targets are set by the Management Board when it conducts management system evaluation.

When measurable targets are set, risks and opportunities are also determined in accordance with the measures to be taken.

- A hazard and risk management system has been developed at AFP. The FMEA analysis is carried out for the manufacturing processes to identify priority risks. As for the priority risks, activities to reduce them are conducted, which has a direct impact on the product quality improvement, environmental safety and an increase in customer satisfaction.
- Within the hazard and risk management system, risk assessment is especially performed in accordance with the HACCP/BRC systems requirements. Risk assessment is displayed in the so-called risk matrix and appropriate measures are taken to that end.
- Separate multidisciplinary HACCP/BRC teams with leaders and their deputies, responsible for the hazard and risk analysis, are formed at each AFP Novi location.
- The teams must, with appropriate training, implement all principles of the hazard and risk analysis in accordance with the latest factory changes and customer requirements as soon as they appear, as well as in accordance with all amendments to legislation.
- The scope of the hazard and risk analysis encompasses all products and processes that are included in the certification scope.
- The hazard and risk analysis takes into account the known frequencies and their impact on the final product in accordance with all recognized guidelines and legal requirements. An analysis of physical, chemical and microbiological hazards and impacts of allergens on the packaging material is also conducted. Process flow diagrams encompass the receipt of input materials, manufacturing, that is, processing, finalization and delivery. Control points are identified and a supervision system, respecting measurement boundaries and all prerequisite programs are defined. The team is in charge of undertaking regular HACCP PLAN revision, and especially in the event of process changes or any incident in manufacturing. Risk analysis also includes social and environmental protection.
- Emergency preparedness and response are analysed within the planning activities.
- After they are identified, all potential hazards, such as fire, explosion, hazardous leakage, etc. are subject to risk analysis. Risk assessment for potential emergencies is conducted based on the probability of such an event and on the possible extent of consequences if such an incident occurs. After the risk assessment has been carried out, a list of significant/potential emergency hazards is drawn up. An emergency management procedure is prepared for each registered emergency situation.
- Incident emergency drills are conducted at least once a year at the Umag and Drniš plants and once in two years at the Zadar plant. After the drills have been conducted, the emergency preparedness and response procedures are reviewed.



4. Resources

- AFP pays great attention to providing human, material and financial resources necessary to ensure manufacturing and maintain and improve the quality management, product safety and environmental protection systems.
- All department heads are responsible for identifying the needs for resources to meet the set quality, product safety, social and environmental protection objectives. The CEO evaluates and approves the planned needs for resources. Within the system evaluation, at least once a year, the CEO assesses the status of resources with regard to the needs and expectations of all stakeholders.
- Special attention is paid to the selection and continuous further training of employees to provide them with additional knowledge, which should, together with practical routine skills and experience, ensure effective and efficient performing of processes.
- To that end, the need for additional training is determined for each employee. Training can be provided by in-house knowledge and experience transfer or by using the services of external institutions. Department heads are in charge of proposing employee training plans.
- At AFP, special attention is paid to the acquired knowledge management; knowledge is mostly acquired through employees' experience. To that end, in-house training is conducted and instructions are developed to transfer and safeguard the company's acquired knowledge.
- Special attention is paid to the quality-related data transfer within the company. Department heads are responsible for the transfer of information and conclusions between the company's Management Board and employees in their department.
- The company has recognized in time that information is the basic asset for a continuous knowledge base development, that is, the company development in general.
- AFP continuously maintains and improves its infrastructure (production assets, information technology, transport vehicles, facilities) as the basis for good performance of work tasks. Special attention is paid to regular maintenance of work spaces and manufacturing equipment. When it comes to equipment maintenance, we create annual prevention examination and periodical maintenance plans and documentall maintenance activities based on the plans.
- In case of manufacturing equipment failure, procedures of reporting, identifying and repairing the failure are carried out. The Maintenance Department Head is responsible for the preparation of Maintenance Plans and the overall activities of manufacturing equipment maintenance, and other department heads are responsible for other equipment.
- The locations' and plants' interiors and all equipment are built in accordance with the BRCGS standard. All work instructions have been prepared and training sessions held for the designed and built facilities to be efficiently controlled. All spaces within the locations have been constructed and must be maintained in accordance with the BRCGS and SMETA/Sedex standard.
- Only employees have access to the locations; all others must report to the entrance guard booth to be allowed access to the factories.
- Cleaning and maintenance of all machines, equipment and warehouse and manufacturing spaces are prescribed and controlled in accordance with the defined plans. 16

All process waste is stored and duly disposed of in accordance with the legislation in the waste sorting containers.



5. Product realization

•Product realization processes that must satisfy customer requirements have been defined, especially with regard to tasks, responsibilities and authorizations. To ensure product realization, we take into account the output results from business processes, individual activities in the processes, control measures, training needs, equipment, methodology, information flow and all other factors that impact the product realization success.

It has been ensured that the whole manufacturing process is controlled through documented instructions, records, parameters on the machinery. Besides the manufacturing process control, product control is also conducted in the laboratories for all control points for which there is no supervision at the machinery. Production control employees are responsible for approving the individual steps of the manufacturing process, as well as for the final product control.

New product development is carried out in close coordination within all manufacturing plants of the Aluflexpack Group. New product development includes preparation, technology selection and test sample manufacturing.

The elements that are assessed in all phases of the technology development process are internal input variables, external input variables and other criteria that are identified as product characteristics and that are crucial for the quality of the new product.

The technology development results are verified and validated, while the information necessary for customer satisfaction and expectations is included. The output variables of the new product development process are the following:

- Product specification;
- Methodology, manufacturing technology;
- •Procurement requirements, including raw and production materials health safety requirements, while highlighting the aspect on their environmental impact
- Product acceptance criteria.

It has been ensured that the whole manufacturing process is controlled through documented instructions, records, parameters on the machinery. Besides the manufacturing process control, product control is also conducted in the laboratories for all control points for which there is no supervision at the machinery. Production control employees are responsible for approving the individual steps of the manufacturing process, as well as for the final product control.

Only calibrated measurement equipment may be used. Only calibrated measurement equipment ensures proof of the product's and parameters' compliance with the determined customer and legal requirements. Equipment is calibrated in accredited calibration laboratories.

When we introduced the environmental management system, we identified the need to monitor legal and other environmental protection requirements.

To that end, instructions for monitoring legal and other requirements have been produced. The company manages and maintains the information that provides proof on monitoring and measuring the products and environmental parameters. This documented information clearly shows whether the products or processes comply with the environmental protection requirements.

Non-compliance refers to any action carried out within the management system that does not comply with the documented information. A non-compliant action is managed based on the documented information in the work instructions and records that concern non-compliant goods management.

AFP Products and Industries









MLIJEČNA



FARMA-

CEUTSKA





Food Industry

- Aluminium foil
- Flexible packaging
- Containers
- Lids
- Pouches (material, shaped pouches)

Confectionery Industry

- Aluminium foil
- Flexible packaging

Pet Food Industry

- Aluminium foil
- Containers
- Lids
- Pouches (material, shaped pouches)

Dairy Industry

- Aluminium foil
- Lids
- Flexible packaging

Pharmaceutical Industry

- Aluminium foil
- Flexible packaging

INDUSTRIES - POTENTIALS

Tobacco industry

Wrapper (inner liner, inner frame)

Technical industry

Flexible packaging

PERSONAL CARE AND HOUSEHOLD

- Cosmetics Detergents Personal Care

 Flexible packaging
- Pouches (material)

Corporate Manual (AFP N-I) - ALUFLEXPACK NOVI d.o.o. **Our Customers**





































































































6. Measurable Performance Evaluation

Supervision, measurement and analysis are conducted to:

- Manage processes and confirm and prove the capability of the processes to achieve the planned (required) results;
- Prove the product conformity with the set requirements;
- > Evaluate the compliance with the corresponding legal and other regulations
- Monitor the environmental protection objectives
- Timely prevent the occurrence of non-compliant products;
- Determine the possibilities for process improvement.

Aluflexpack Novi evaluates end customer satisfaction based on the documented information or on the individual annual evaluation.

Customers' audit results are also included in the customer satisfaction evaluation. Records of all pieces of information regarding customer satisfaction are kept in the documented information, so that they are suitable for analyses and reports to the Management Board. Based on the reports, the Management Board evaluates customer satisfaction and makes decisions that should lead to improvement of that satisfaction.

In-house audits (in-house evaluation of the quality management, product safety and environmental protection system) are conducted in the way described in the corresponding documented information. In-house audits determine:

- The existence of documented information relating to the quality management, product safety, social and environmental protection systems and their conformity with the requirements of the ISO 9001, HACCP/BRCGS, SMETA/Sedex and Ecovadis and ISO 14001 standards:
- The suitability of the documented information about the management system for ensuring efficient and effective implementation of the processes and achieving the quality, product safety, social and environmental protection policies and objectives;
- > The application level of the documented management system information;
- The existence of the possibility to improve the management systems.



At least once a year, the CEO reviews and evaluates the effectiveness and efficiency of the management systems with a view to determining the conformity with the strategic direction. The output data of the system evaluation include the extent of achievement of the quality, product safety, HACCP and environmental protection objectives, defining the needs for starting improvement actions and risk assessment; opportunities for improvement; decisions and actions relating to possible human and labour rights and work health and safety protection and environmental policy changes, individual and general objectives and other elements of the human and labour rights, work health and safety protection and environmental management system; annual measurable objectives plan.

In the Quality and Food Safety; Environmental, OH&Safety, Social&Ethics, Sustainable, Responsible Sourcing and FSC Policy, we have committed to continuous improvement of the management system efficiency. Initiating and carrying out improvement actions and activities resulting from risk assessment are the backbone of improvement in our company.