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**SAN GABRIELE S.p.A.** has always been able to identify and implement those investments and internal transformations that have allowed it to offer its customers a high capacity to offer the services and products required, both in terms of quality and quantity.

The characteristics of the markets, in particular foreign countries, to which the organization has long been addressing, have however imposed and require more and more strategic updates to continue to maintain and possibly improve the levels of Customer Satisfaction to which the Company has accustomed its Customers.

For this reason, the factory intends to:

- Consolidate the positions acquired and intensify its expansion;
- Improve more and more the portfolio of products for the customers;
- Enhance and achieve technological innovation on its own processes;
- Consolidate cooperation between departments at all levels of the organization.
- Create a development plan on the issue of natural resource preservation
- Promote the culture of quality, safety and environment development

In order to achieve these goals, the Management is committed to:

- Analyze the express or implicit needs of the customer and collaborate with it for a complete definition of the requirements of the product, preserving and improving over time this relationship of collaboration in order to obtain its full satisfaction;
- Comply with the quality standards previously set and, at the same time, improve them, to provide full visibility to your product/ service and to make communication activities as effective as possible.
- Introduce into its production system suitable traceability processes that can meet the consumer's needs for identifying the origin of products, characteristics and production methods to allow consumers to make informed choices
- Ensure consumer protection through the correct application of the principles of food safety at all stages of product/service production, while achieving continuous and reasonable improvement in terms of adequacy, efficiency and safety, the infrastructure and means dedicated to the processing, storage and delivery of the product;
- Commit to purchasing sustainable, ethical, and responsible goods, services, and materials.
- Ensure, throughout the production and distribution chain, the compliance with applicable legislation, technical standards and operating procedures;
- Involve suppliers as an integral part of the company in achieving the levels of quality set and empower them for a total guarantee;
- Sensitize, train and involve all employees of the company in the continuous improvement of the products and services provided and full compliance with all rules and hygiene practices;
- To activate a process of continuous improvement of the service rendered to the customer through a constructive and continuous action of all the actors of **SAN GABRIELE S.p.A.**
- Continuously improve the effectiveness of the implemented Quality Management System
- To guarantee over time ethical standards and social responsibility towards company personnel and compliance with ILO principles and related recommendations, also requiring suppliers to comply with the same standards
- Improve the quality management system according to the requirements of the standards FSSC 22000, ISO 9001, ISO 14001, ISO 45001, SGF in their most updated versions;
- Define, renew and make known to the relevant functions clear measurable **objectives** for the continuous improvement of food quality and safety;
- Create a **collective commitment** to quality and food safety through the involvement, training and participation of all staff.

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A core principle of the company is the **team** concept in which everyone carries out the tasks assigned for the common good. In San Gabriele S.p.A. there is a strong will to listen to the needs of all and to always try to satisfy them, without ever implementing any form of discrimination and without ever disrespecting anyone.

These actions, which will constitute the reference framework for establishing and reviewing the specific quality objectives, will be pursued with entrepreneurial will, made feasible by providing the necessary staff resources, equipment, infrastructure and means.

All the staff of **SAN GABRIELE S.p.A.** is responsible for ensuring, as far as its competence is concerned, that the product produced and the service offered comply with the requirements of the Quality Manual, Company Procedures and any Operating Instructions, and good manufacturing practices.

To disseminate the concept of Quality, to raise awareness to operate more and more in the Quality regime and to improve, finally, the Quality with which the organization operates, refresher courses (internal or external) will be held, to which employees will be called to participate.

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## **ENVIRONMENT AND SAFETY POLICY**

San Gabriele S.p.A. considers quality, environment respect and protection, occupational safety and health, fundamental values of its corporate responsibility towards the community and its employees.

In this point of view, it is constantly committed to ensuring maximum environmental protection and safe and healthy occupational conditions in its industrial development, guaranteeing the quality of life of today and future generations.

In order to achieve this goal and to concretely pursue these intentions, San Gabriele S.p.A. undertakes to provide adequate means and resources for the research and development, production and marketing of the products Environmental and occupational health and safety management systems, from a product life cycle perspective, from its birth to its disposal, as follows:

### **Managerial responsibility and human resources**

- Act responsibly, in full compliance with applicable environmental legislation, freely agreed environmental commitments and occupational health and safety legislation on health and safety at work
- Reduce or, if possible, eliminate environmental impacts and workplace risks generated by their activities and maintain a proactive role in preventing them
- Implement, document and maintain an environmental management system
- Provide the necessary human resources, professional skills and financial resources, through assigning roles and responsibilities to supervisors and department heads to implement and control the operation of environmental management systems and occupational health and safety
- Pursue an open and constructive attitude towards the public, users, public authorities and other stakeholders.

### **Technological development and innovation**

- Evaluate business processes and activities in order to improve and support competitiveness and increase national and international market leadership, with objectives of innovation and continuous technological improvement, prevention of pollution and protection of health and safety
- Carefully evaluate the aspects regarding future business developments by making choices also technological to the advantage of solutions that give greater guarantees in terms of protection and respect for the environment, health and safety at work
- Ensure compliance with legislative requirements on environmental responsibility, in particular by ensuring adequate resources for the management of waste water treatment plants;
- Continuously practice the analysis of environmental indicators and safety, opening appropriate prevention and improvement actions to solve at the root the problems highlighted;
- Develop a plan in order to reduce climate impacts and aimed at safeguarding natural resources such as saving water resources used in the company and the use of energy from renewable sources, reducing greenhouse gas emissions, protecting soil and biodiversity.
- Commit to reducing the amount of waste produced by also preferring packaging made from recycled, recyclable, and reusable materials.

### **Training, communication and involvement**

- Ensure the involvement and participation of all staff for the full sharing of the policy for the environment and health and safety at work and business objectives in order to develop a culture oriented towards environmental protection and maintenance and development of safe working conditions
- Ensure that all company personnel receive adequate training and information on their tasks and responsibilities within the environmental management system and understand the implications of their activities to the environment
- To disseminate and promote to suppliers and contractors the principles of this policy, committing them to maintain consistent behaviour

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## **BUSINESS PRACTICE POLICIES**

San Gabriele S.p.A. operates in accordance with national and European laws.

The violation of laws and regulations can lead to severe consequences, including the criminal sphere, fines and damage to the reputation of San Gabriele S.p.A. and will not be tolerated in any way.

### **Fraudulent activity**

We promote the creation of an ethically correct working environment. Fraudulent activities are categorically prohibited. All employees play a crucial role in preventing and detecting fraudulent activities. Examples of fraudulent activities include, for example:

- Non truthfulness of the label compared to the real ingredients included in our products;
- Exaltation of **particular** non truthful characteristics of the product through claims and advertising material.
- Falsification or manipulation of the registration of documents, financial statements and other official documents
- Any misappropriation or theft of business assets, resources, or time spent for personal gain.
- Intentional errors or omissions of tax material, transactions, or other information.

### **Right to competition**

We support free and fair competition. Price fixing, market sharing and other anti-competitive practices are prohibited. The European Union's free competition law was designed to maintain a competitive economy. We support these laws, which aim to ensure the free market and give everyone a chance to succeed based on superior quality products. The violation of competition law is not only against our company policy, but can also result in serious financial penalties and possible criminal liability and imprisonment for individuals.

### **Conflict of interest**

All employees are required to avoid conflicts of interest. A "conflict of interest" occurs when a personal interest, professional or financial, interferes with the interests of San Gabriele S.p.A. A conflict of interest can make it difficult for an employee to make impartial decisions that are in the best interest of San Gabriele S.p.A.

Negotiations on behalf of San Gabriele S.p.A. must never be influenced by personal considerations or relationships.

It is not possible to expose all possible situations in which a conflict may arise. The fundamental factor in any conflict of interest situation is, however, the division between the interest of San Gabriele S.p.A. and your interest.

### **Corruption**

We compete and do business based only on quality and competence. We have zero tolerance for corruption of any kind, whether committed by employees, officials, or third parties acting for or on behalf of San Gabriele S.p.A.

We are committed to doing business in a fair, honest and legal manner with our customers, co-workers, suppliers and competitors. We are competitive, but always in compliance with the anti-corruption laws applicable in Italy and within the European Union.

It is also our policy to require agents, consultants and partner companies operating on behalf of San Gabriele S.p.A. to comply with these same laws and practices.

Failure to comply with anti-corruption legislation in the countries in which we operate could have serious civil and criminal consequences for society and the people involved.

The following rules apply to all permanent and temporary employees, executives and all business partners of San Gabriele S.p.A. and all related persons, including agents and sales representatives.

### **Money laundering**

We are committed to complying with all the anti-recycling laws in force in Italy and in the European Union.

Money laundering is an attempt by an individual or organization to hide the proceeds of a crime and make them appear legitimate. San Gabriele S.p.A. strictly prohibits operations that facilitate money laundering.

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We are committed to conducting business only with clients involved in legitimate business activities, with funds from legitimate sources. Likewise, our qualified suppliers are not involved in non-legal commercial activities.

The employees of San Gabriele S.p.A. play a fundamental role in helping the Company, having relationships with customers and suppliers who can involve us in money laundering. Such relationships and transactions could seriously compromise the integrity and reputation of the Company. Employees should be alert to one of the following types of activity, which may indicate that money laundering is involved:

- A proposed client, agent or business partner, who is reluctant to provide complete information or providing suspicious information;
- Requests to make or accept cash payments;
- Structuring transactions to avoid keeping records or reporting obligations;
- Unusually favourable payment terms;
- Orders or purchases inconsistent with a customer's normal business;
- Requests to make payments to, or accept payments from, third parties;
- Unusual transfers to or from countries unrelated to the transaction;

The Management of San Gabriele S.p.A. undertakes to make this document known and disseminate it to all staff, certain of a fruitful collaboration and excellent teamwork.

Trebaseleghe (PD), 04/06/2025

Gabriele Tombacco  
CEO

