

COMPANY POLICY

In line with the principles of the Smurfit Westrock Group, Vitop USA is committed to achieving its business objectives while upholding its responsibilities towards employees, customers, stakeholders, health and safety, sustainability, and environmental stewardship. This policy serves as a reference to guide our actions and ensure alignment with best industry practices and regulatory requirements, including compliance with U.S. laws and regulations.

CUSTOMER SATISFACTION

- Constant attention to customer needs.
- Transparency in relationships while ensuring data protection and confidentiality in compliance with global standards.
- Promoting research and development of new products and solutions able to meet and anticipate the needs of our customers and end users.
- Investment in research and development for sustainable and customer-centric product innovations.
- Enhancement of digitalization efforts for seamless customer interactions and improved service efficiency

CONTINUOUS IMPROVEMENT

- Constant and careful analysis of the context in which we operate, risks/opportunities and related actions to address them.
- Strengthening quality management with advanced automation and real-time monitoring of production lines.
- Commitment to reducing waste and non-compliant products through lean manufacturing and sustainability-driven processes.
- Enhanced business intelligence tools for monitoring key performance indicators and internal processes.

ETHICS AND STAFF INVOLVEMENT

- Involvement, participation and constant training of personnel.
- Promoting teamwork and professional growth.
- Strengthened policies for ethical conduct, corporate social responsibility, and employee well-being.
- Ongoing social responsibility commitment.
- Promotion of a dynamic, inclusive, and diverse work culture with measurable DEI (Diversity, Equity, and Inclusion) objectives.
- Promoting the awareness and culture growth of all personal



• Transparent internal and external communication fostering trust and collaboration.

HYGIENE AND FOOD SAFETY OF THE PRODUCT

- Adherence to the latest U.S. and global food safety and hygiene standards, including FDA, ISO, and HACCP updates.
- Exclusive use of certified raw materials suitable for food contact, meeting evolving regulatory requirements.
- Development of sustainable packaging solutions to enhance food safety while reducing environmental impact.
- Continuous training programs to ensure personnel are equipped with best practices in hygiene and safety.

RESPECT FOR THE ENVIRONMENT

- Implementation of circular economy principles to minimize resource exploitation and enhance product life cycles.
- Targeted initiatives for net-zero carbon emissions, renewable energy integration, and waste reduction.
- Identification of technological processes, and/or operating procedures able to reduce and/or control environmental impacts. Development of eco-friendly product designs that prioritize recyclability and sustainability from inception.
- Promotion of a corporate culture centered on environmental stewardship through training and engagement.

HEALTH AND SAFETY OF EMPLOYEES

- Commitment of management and of the organization to the health and safety management system of its employees, visitors and all collaborators who intervene on the site.
- Empowering the entire organization to consider Safety not only as a priority but as an enterprise value.
- Identification and management of all risks to the health and safety of workers through a defined methodology.
- Implementation of the Smurfit Westrock Group's standards for the analysis of events, the definition of procedures on aspects considered to be of the greatest risk and the management of behaviour.
- Information, education and training at all company levels, in accordance with Group legal requirements and standards to develop professional skills and the commitment to operate in compliance with prevention and protection procedures.
- Strengthened health and safety management system in compliance with OSHA regulations.
- Identification and proactive management of workplace hazards.
- Expansion of employee wellness programs, including remote work ergonomics and mental health initiatives.



• Regular training and emergency preparedness to maintain a safe working environment for all stakeholders.

RESPONSIBLE SUPPLY OF RAW MATERIALS

- Collaboration only with certified suppliers able to ensure full traceability of goods and provide certifications demonstrating compliance with national and international laws.
- Rigorous ESG (Environmental, Social, and Governance) compliance requirements for suppliers.
- Collaboration with suppliers who uphold human rights, fair labor practices, and environmental sustainability.
- Commitment to full transparency in sourcing, ensuring ethical procurement aligned with U.S. and global best practices.

This policy is communicated to all employees and is available to all interested parties.

The management is committed to reviewing this policy regularly in line with good industry practice.

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Massimiliano Bianchi

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