

The Food Contact Materials Policy drives the safety, quality and legality management system and aligns the purpose and strategic direction of the company with regards to the global standards for consumer products and packaging materials.

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| 1 | Purpose | 1 |
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- 1.1 The purpose of this policy is to set out Polyco Healthline's approach and commitment to the safety, quality and legality of the products produced under the BRCGS Consumer Packaging and/or BRCGS Packaging Materials management systems.
- 1.2 The policy supports the company's strategic direction and serves as a basis for establishing food contact materials safety, quality and legality objectives

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| 2 | Scope | 1 |
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- 2.1 The statement of policy is for BRCGS Consumer Packaging Issue 4 – Personal Care & Household, and BRCGS Packaging Materials issue 7, encompasses the procurement, manufacture and warehousing activities for the food contact products detailed in the scope of our relevant certification.

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| 3 | Definitions | 1 - 2 |
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For the purposes of this policy the following definitions apply.

- 3.1 **Customer focus**  
A structured approach to determining and addressing the needs of an organisation to which the company supplies products and which may be measured by the use of performance indicators.
- 3.2 **Food safety**  
Assurance that food will not cause harm to the consumer when it is prepared and / or eaten according to its intended use.

### 3.3 **Legality**

Incompliance with the law in the place of production and in the countries where the product is intended to be sold.

### 3.4 **Product safety and quality culture**

The attitudes, values and/or beliefs which are prevalent at the site, relating to the importance of product safety and the confidence in the product safety systems, quality system, processes and procedures used by the site.

### 3.5 **Quality**

Meeting the customer's specification and expectation.

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| 4 | Policy | 2 |
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The statement of policy represents Polyco Healthline's obligation and commitment to the global standards for Consumer Products and Packaging Materials, and how we shall achieve consistent product safety, quality and legality through the following activities:

- Conduct, implement and review a suitable and effective Hazard Analysis Study (HACCP / HARA plan) and maintain compliance to the practices identified by the HACCP study.
- Provide a safe and legal product that meets customer requirements, through our BRCGS management system. On-going compliance shall be monitored through the internal audit programme.
- Set objectives that are defined, measurable and attainable whilst maintaining compliance and promoting continuous improvement. Objectives shall be agreed and set annually at the Management Review.
- Maintain a training programme that ensures:
  - » the importance of food safety, quality and legality is understood and carried out throughout the company
  - » this policy is understood, implemented and maintained at all levels within the company.
- Maintain conformity to relevant food safety regulations and standards including:
  - » BRCGS Consumer Products Issue 4 – Personal Care & Household
  - » BRCGS Packaging Materials Issue 7
  - » Food Contact Regulations EU 1935/2004 and EC 2023/2006 Materials and articles intended to come into contact with food
  - » Regulation (EU) 10/2011 (with amendments), Plastic materials and articles intended to come into contact with food.
- Ensure that adequate resources and infrastructure are in place to meet the food safety objectives and that the product safety and quality culture is aligned with the objectives to ensure that we deliver safe products to the required quality.
- Measure performance of product safety incidents and take corrective and preventive actions as required.
- Review the policy periodically (minimum annually at Management Review) to ensure ongoing suitability.

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| 5 | Responsibilities | 3 |
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#### 5.1 **Board**

The board and non-executive directors provide support and strategic direction for the company's food contact product safety and quality management system.

#### 5.2 **Departmental Managers**

Departmental managers are responsible for ensuring:

- Staff understand the processes, policies and procedures in each of their departments
- That any quality management training (including induction and policy training) is recorded on the company Papaya platform.
- Educating and working with staff to ensure they understand how their role within the company supports the food contact materials policy.

#### 5.3 **Technical Department**

The technical department is responsible for:

- Management of the food contact product safety and quality management system.
- Managing the management review.
- Data analysis and reporting of the company safety, quality and legality performance.
- Tracking and follow up of objective progress and management review actions.

#### 5.4 **Employees**

Employees are required to comply with the company's policies and procedures as set out in their employment contract, handbook, and training plans.

Every member of staff under the food contact materials safety system impacts and supports commitment and compliance to the policy.

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| 6 | Communication | 3 |
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This policy is communicated through the company shared drive/intranet, company website ([www.polycohealthline.com](http://www.polycohealthline.com)) and company notice boards, and forms part of the induction training programme and will be made available to all interested parties.

Signature:



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Date of Issue:

08/05/2025

Position:

Chief Operating Officer

Date of Review:

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