



## NOVOLEX Food Safety Policy

10/8/2018

NOVOLEX is committed to providing competitive products and services to the highest standards of performance and reliability, while building customer trust and confidence by providing our customers with safe, quality food packaging.

A food safety management system has been designed and implemented in our food contact packaging facilities to meet all customer food safety requirements, along with industry best practices. This is to effectively manage food safety in our supply chain, at each production facility and throughout the organization. Food safety and quality development teams have been identified and are well established within our organization. Each individual is provided the necessary training and support to enable them to facilitate the continuous improvement expected by our management team. The food safety systems are independently audited by accredited certifying bodies.

NOVOLEX recognizes that a successful food safety culture is achieved by following safe working practices and procedures. This culture is developed through the following:

- **HACCP Plan** – each Food Contact Packaging Plant has a HACCP plan in place for effectively analyzing hazards and risks to raw materials and finished goods.
- **Good Manufacturing Practices** – based off of Global & Domestic standards and principles to ensure production of safe products that exceed Customer expectations for safety and quality.
- **Training** – effective training programs have been established to interconnect and enable our Employees to perform all tasks beyond expectations. Work instructions are available to ensure they do so in a hygienic manner, as we assure the safety of the products and eliminate risks of contamination.
- **Continuous Improvement** – our plants are fully engaged in Continuous Improvement activities to improve all aspects of Safety, Food Safety and Quality.

From our raw material suppliers to our ownership, we are fully involved in all aspects of the production of food safe products. The ongoing commitment of NOVOLEX is to supply our customers with safe, consistent, quality products.

A handwritten signature in black ink, appearing to read "Ben Mascarello".

---

**Ben Mascarello**  
**COO**  
**Novolex Holdings, LLC**

A handwritten signature in blue ink, appearing to read "Chris Wales".

---

**Chris Wales**  
**Director of Quality**  
**Novolex Holdings, LLC**