	<h2>Document général</h2>	Date de création: 8/05/2017 Date de mise à jour: 17/01/2024 Versie: 19 Status: Goedgekeurd - Approuvé
Référence : AD.KS.01	Policy Statement for the company Clarebout	Raison modification: Ajout précision Food Fraude dans la partie qualité et chgt date de signature direction

**SATISFIED EMPLOYEES, SATISFIED CUSTOMERS AND SATISFIED CONSUMERS ARE THE KEY TO OUR INTERNATIONAL SUCCESS.**

**CLAREBOUT IS SYNONYMOUS WITH BELGIAN CRAFTS, FROM POTATOES TO FROZEN FRIES AND POTATO FLAKES.**

Clarebout is a flexible, innovative and customer-oriented company. From the purchase of potatoes and raw materials to our frozen fries and potato flakes, we guarantee quality and craftsmanship.

Sustainable business practices are at the heart of our decisions. This means that we take into account people and society, the local economy and the environment. We therefore aim for long-term relationships with all stakeholders, including employees.

Continuous improvement and the realization of ambitious plans is in the company's DNA. That's why we strive for the best results in the areas of quality, product safety, occupational safety and the environment. We aim for satisfied employees, satisfied customers and satisfied consumers. After all, they are the key to our success.

### FOOD QUALITY AND SAFETY

At Clarebout Potatoes, we attach great importance to the quality and food safety of our products and services, in order to satisfy our customers.

We are committed to diffuse the quality policy described below with the support of the quality department throughout the organization and to taking the necessary measures for its implementation. Each employee, taking into account their responsibilities and skills, must constantly make an active contribution in order to optimize and guarantee the quality and food safety of our products.


#### **1- Struggle against food safety risks**

We have carried out a risk analysis for each step of our process in order to highlight the critical points and points of attention that need to be followed. This risk analysis is regularly reviewed and updated as changes are made to our production sites. We are working to continuously improve our self-monitoring system.

#### **2- Develop a quality management system**

We provide the necessary procedures and work instructions to ensure proper management of the quality system. These help us manage risk and meet the requirements and expectations listed below. The operation of the quality system is described in the quality manual.

#### **3- Comply with legal requirements, other obligations, and our promises to stakeholders**

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We are committed to complying and continuing to comply with European legal requirements, the requirements of the self-control system and IFS/BRC standards, *as well as FCA standards for animal feed*. The periodic audits (internal and external) that we have in place help us to improve and evolve our system. Changes in applicable legislation/standards are monitored by the quality department, which communicates them so that they can be implemented.

#### **4- Promoting a business culture focused on food safety and quality**

We communicate about the quality policy and are committed to creating a corporate culture on the topic of food safety. We communicate internally about quality requirements, controls and procedures. All employees are involved in the optimization of the quality system, with the aim of motivating them to commit to achieving the set objectives, so that they can be achieved in an acceptable manner and the results obtained remain visible in the long term.

#### **5- Improvement of the quality system**

We make policy concrete by defining specific, measurable, acceptable, and time-bound goals. These are included in the annual management review. Objectives are set for each department but also for each important theme: customer complaints, product analysis, etc. An evaluation is done 4 times a year to check the status of each objective.


#### **6- Prevent non-conformities**

This policy is written based on the fact that any form of non-compliance must be avoided. In addition to focusing on food safety, we also provide the necessary technical and organizational measures to limit non-conformities in our products and to guarantee our customers a quality product that meets their requirements. In the event of non-compliance that has an impact on the food safety or legality of the product (Food Fraud), a thorough investigation is carried out to determine the origin. Corrective and preventive measures are put in place.

#### **7- Training and information**

We want to support employees in the performance of their tasks by providing them with the necessary training and information related to quality, food safety or the legality of the product (avoid any food fraud)

Every year, they receive training on hygiene rules and food safety. They are also trained on Food Defense and the risk of food fraud.

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## SAFETY & HEALTH

Clarebout places the well-being of the people on its sites at the forefront of everything it does. Out of respect for its employees, the company is committed to their safety, physical and mental health. Particular attention is also paid to ergonomics, occupational hygiene and the working environment. We are committed to communicating the wellbeing policy outlined here, with the support of prevention services, throughout the organization and taking the necessary steps to implement it. Employees and/or their representatives participate and are consulted in the development of the well-being policy and on matters that concern them for its implementation.

### 1- Systematically address risks and operate opportunities

We work on prevention. To do this, we carry out risk analyses. These help us to take the necessary measures and prevent risky situations.

Risk analyses are reviewed regularly and are systematically updated as technical, organizational or other changes occur.

Opportunities to increase safety and improve employee well-being are also identified and seized.

### 2- Develop and maintain an appropriate management system

We provide the necessary agreements and procedures to ensure the proper functioning and security of our organization.

These help us manage risk and meet the requirements and expectations listed below.

The operation of the management system is described in the safety manual.

### 3- Comply with legal requirements, other obligations, and our promises to stakeholders

We are committed to respecting and continuing to comply with the legal requirements and the requirements of ISO 45001.

The periodic audits (internal and external) we have put in place help us achieve this ambition.

We also consider good relations with our employees and their representatives to be crucial.

### 4- Promote a corporate culture focused on health and safety

We communicate about the safety and health policy and are committed to creating a culture of safety. Failure to comply with safety rules is not acceptable. The reporting line should serve as an example in this regard.

This safety culture aims to involve employees in the optimization of working conditions and to motivate them to commit to achieving the objectives set, so that they can be achieved in an acceptable way and that the results obtained remain visible in the long term.

### 5- Continuously improve the way the organization works

We make policy concrete by setting specific, measurable, acceptable, realistic and time-bound goals. These are included in the annual action plan and in the overall prevention plan.

- A number of these objectives relate to the reduction of the frequency rate and the severity rate of accidents at work.

- In addition, we determine who is responsible for implementing a specific part of the safety and health policy.

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- We also make available the time and resources necessary to implement or enforce the security policy.

For example, we work to continuously improve health and safety in our organization.

### 6- Preventing Damage

This policy is written based on the belief that any form of damage resulting from insecurity should be avoided.

In addition to focusing on risk prevention, we also provide the necessary technical and organizational measures to limit damage to people, infrastructure and the environment if it threatens to occur. For example, we maintain a highly developed system for fire detection and firefighting.

### 7- Train and inform employees

We want to support employees in the performance of their tasks by providing them with the necessary training and information.

Only in this way can they contribute to the achievement of organizational safety and health goals.

We consider this to be crucial for the functioning of our organization and for safety in the workplace.

## Undertake sustainably

We strive to protect and minimize environmental impact in the conduct of all our business activities. When making political decisions, the preservation and promotion of the living environment are therefore taken into account and the effects on water, noise, air, etc. are taken into account. Rigorous management of energy consumption is an important part of this. We are committed to promoting an environmental policy throughout the company and taking the necessary steps to implement it.

### 1- Systematically address environmental risks.

The actions we take to achieve this environmental policy are based on an analysis of environmental aspects. These analyses are reviewed regularly and are systematically updated as technical, organizational or other changes occur. Opportunities to limit risks to the environment and energy consumption are also identified and seized. Energy efficiency is included in the purchase process.

### 2- Developing an environmental management system

We provide the necessary agreements and procedures to ensure proper management of environmental risks. helps us manage risk and meet the requirements and expectations listed below. Environmental management pays particular attention to energy consumption. We remain on the lookout for opportunities to reduce our environmental impact.


These agreements and procedures concern all levels of the organization and all activities with a potential impact on the environment.

The operation of the management system is described in the Environment Manual.

### 3- Comply with legal requirements, other obligations, and our promises to stakeholders

We have an environmental and energy policy that complies with all applicable laws and regulations.

An energy management system has been developed in accordance with Appendix 9 of the Energy Policy Agreement. In addition, we want to meet the requirements of EN ISO 14001.

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We seek transparent communication with staff, government and the environment on the implementation of our environmental policy.

#### **4- Stimulating environmentally friendly behaviour**

Employees are actively involved in environmental and energy policy.

We want an organizational culture that aims to involve employees in the optimization of environmental protection measures and motivate them to commit to achieving the set goals so that they can be achieved in an acceptable way and the results achieved remain visible in the long term.

#### **5- Continuous improvement of the environment**

With our environmental management system, we aim for efficient environmental and energy management and continuous improvement. We make policy concrete by setting specific, measurable, acceptable, realistic and time-bound goals. These are included in an annual environmental action plan. Management is periodically informed of the extent to which objectives have been achieved. In terms of energy consumption, we have the following ambitions:

- The (significant) energy flows have been mapped and are being updated.
- Energy consumption figures are measured, recorded and verified. The causes of any deviation in energy efficiency are investigated.
- Formulated energy targets are updated and communicated every six months.
- Energy reduction measures have been formulated, planned and are being implemented. - The result of these energy reduction measures is evaluated periodically.

Clarebout has chosen to invest as much as possible in the necessary transition from a classic business model to a circular one in which raw materials are frequently reused. One of the applications is the recovery of phosphate from wastewater to make struvite and the valorisation of secondary streams.

#### **6- Prevention of environmental damage and pollution**

This policy is drafted from the belief that all forms of damage and pollution must be avoided.


In addition to placing a strong emphasis on the prevention of environmental risks, we also provide the necessary technical and organizational measures to limit damage to the environment and the surrounding area if it threatens to occur. We organise transport efficiently to reduce emissions and nuisances to a minimum. New roads have been built to reduce the impact on the city centre. We are also investing in quieter trucks.

Our ambition is sustainable agriculture and production, with the smallest possible impact on biodiversity. The goal is to reduce the footprint from the potato field to the customer's plate.

#### **7- Training and information**

Employees are informed of what they can do to minimize the company's impact on the environment. For example, the focus is on waste sorting and the correct use of the sewage system.

Our ambition is to inform employees about the environmental results that are important to them.

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### BUSINESS ETHICS

#### 1- Corruption and bribery

All business relationships must be based solely on objective criteria.

All transactions carried out must comply with the internal commercial policy but also with the European legislation on commercial transactions.

All those in contact with key stakeholders are informed and trained so that they can work and make decisions in strict compliance with our business ethics policy.

Clarebout's legal department is there to provide help or answer questions in case of doubt.

#### 2- Development of an ethical management system

Clarebout aims to create a work environment that supports productivity, dignity and self-confidence, as well as the pursuit of personal goals. Employees are treated with fairness and respect. Clarebout makes every effort to protect workers from intimidation and takes action to address any problems that may arise from it. There is no discrimination. Clarebout applies the principles of the Ethical Trading initiative Base Code (<https://www.ethicaltrade.org/eti-base-code>)

#### 3- Compliance with legislation

The management of the business must be carried out in accordance with all applicable laws and regulations. No illegal activities carried out on a personal basis or on behalf of the company are accepted.

Clarebout strives to maintain an open and cooperative relationship with the relevant authorities. The information provided is complete, fast and accurate.

#### 4- Promoting an ethical culture

Clarebout is developing an ethical culture in its company. Clarebout is a member of SEDEX. It is a secure online database and supply chain management tool that helps organizations identify, manage, and reduce ethical risks in global supply chains. SEDEX works with all stakeholders in the supply chain with the aim of improving ethical and responsible business practices. As a member of SEDEX, we can share and manage information in four main areas: labour standards, health and safety, environment, and business ethics.


#### 5- Continuous Business Improvement

Clarebout is an international company with a strong reputation for providing quality products and services. We pursue the best results for the company, the highest return for our shareholders and the best possible service delivery for our clients. All necessary means are put in place to ensure the safe manufacture of quality products by employees treated with dignity.

#### 6- Information and data protection

All necessary precautions are taken to ensure the protection of information related to the company (operational,...) but also information related to our business partners. All information is treated confidentially.

#### 7- Communication

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Clarebout attaches great importance to communicating clearly and transparently with our stakeholders.

External communication is done by the representative of the legal department.

Jan Clarebout,  
CEO

Done in Neuve-Eglise, March 2022