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SHEQ Management System
Quality Management Standard for the Supply of Packaging Products

of company

SCHÜTZ GmbH & Co. KGaA
Schuetzstrasse 12, 56242 Selters, Germany
including legally affiliated companies
- hereinafter referred to as "SCHÜTZ" -

Preamble:
This document describes the SHEQ management system practiced at SCHÜTZ and is valid as a binding quality management standard for deliveries of packaging materials from SCHÜTZ to the CUSTOMER.

The document shall remain valid for an unlimited period of time, unless possible updates or additions to the quality management standard are made therein. In such a case, the CUSTOMER will be informed by SCHÜTZ of the currently valid revision status and this will be made available for retrieval on the SCHÜTZ homepage or by mailing. The previous version automatically loses its validity.

Should the Quality Management Standard be terminated by the CUSTOMER after expiry of the Sales Agreement, SCHÜTZ reserves the right to cease making further deliveries.

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Glossary

ADR *Accord européen relatif au transport international des marchandises Dangereuses par Route*
BAM ..... *Bundesanstalt für Materialforschung und -prüfung*
CFR ..... *Code of Federal Regulations*
CoCs ..... *Certificates of Compliance/Conformity*
EC ..... *European Community*
EN ..... *European Standard*
FDA ..... *Food and Drug Administration*
FSSC ..... *Food Safety System Certification*
GFSI ..... *Global Food Safety Initiative*
GGR ..... *Gefahrgutregeln*
HACCP ..... *Hazard Analysis Critical Control Points*
HDPE ..... *High Density Polyethylen*
IATA ..... *International Air Transport Association*
IBC ..... *Intermediate Bulk Container*
IEC ..... *International Electrotechnical Commission*
IMDG ..... *International Maritime Code for Dangerous Goods*
ISO ..... *International Organization for Standardization*
MSDS ..... *Material safety data sheet*
PWIS ..... *Paint-wetting impairment substances*
RID ..... *Internationale Beförderung gefährlicher Güter im Schienenverkehr*
SHEQ ..... *Safety, Health, Environment, Quality*
TS ..... *Technical Specification*
TSE/BSE ..... *Bovine Spongiforme Enzephalopathie/Transmissible Spongiforme Enzephalopathien*
UN ..... *United Nations*
VCI ..... *Verband der Chemischen Industrie*
VDMA ..... *Verband Deutscher Maschinen- und Anlagenbau*
VPA ..... *Verpackungsprüf- und Ausführungsrichtlinien*

1 - Quality Management Standard

Our CUSTOMERS' satisfaction with our products and our service is based on the fact that our products fulfil their application purpose as intended and expected. Our products and production processes are therefore designed to ensure that once material compatibility has been assured the quality of the filling products is optimally protected during transport and storage by the packaging and that contamination risks are largely excluded. It is our goal to continuously improve our products and processes and thus to constantly increase the benefits for our CUSTOMERS.

1.1 - SHEQ Management System

All SCHÜTZ production sites are globally certified according to the ISO 9001:2015 quality management system standard, which forms the basis for our integrated SHEQ management system. A constantly rising number of sites are certified to ISO 14001, ISO 45001 and ISO 50001 standards. The basis for FOODCERT and CLEANCERT products is the certification of the locations according to FSSC 22000.

Quality relevant information, documents, data and records (e.g. operating and work instructions, test results, measurement data, production control plans, risk analyses) are managed according to the specifications of our management system and are structured uniformly at all locations.

SCHÜTZ FOODCERT products are produced in accordance with the rules of the FSSC 22000 management system standard, which is recognised by the Global Food Safety Initiative (GFSI), in conjunction with TS 22002-4 (food packaging). Thus apply that our FOODCERT products meet the highest cleanliness and safety standards for the materials used, the end product and the entire production process. Comprehensive HACCP analyses and the resulting risk prevention measures has been minimised the risk of contamination as far as possible along the entire production process.

SCHÜTZ CLEANCERT products are based on the specifications of the FSSC 22000 and are manufactured under the preventive programs of FOODCERT products. They offer a new standard of technical cleanliness and safety for the protection of sensitive products that are not used in the food industry. Therefore, SCHÜTZ focuses on the requirements of very demanding industries such as the automotive, coatings, semiconductor and peroxide industries.

It is in SCHÜTZ's interest and responsibility that the upstream suppliers we use are adequately qualified and monitored using suitable methods (e.g. by means of certificates, audits, etc.).

Tests of the process and the finished product are carried out in accordance with legal and internal specifications. The test equipment and testing facilities we use are calibrated in accordance with nationally and internationally valid standards. The measurement results are documented and archived.

1.2 - Audits

The uniform management system in all plants ensures that the product properties are the same. This eliminates the need for the CUSTOMER to approve each individual plant as a reliable supply source.

Irrespective of this, the CUSTOMER can request an audit of each plant after appropriate agreement and obtain on-site relevant documents and processes.

1.3 - Cleanliness of the surfaces that come into contact with the filling product / cleanliness of the container exteriors

By implementing and continually improving extensive preventive programmes, SCHÜTZ strives towards minimising the potential contamination risk for filling products in line with the current state of the art technology and in accordance with recognised and applicable quality and system standards.

Our production sites offer the option of storing the finished products under roof or in a closed room. In case of capacity bottlenecks, these storage spaces are reserved for our FOODCERT and CLEANCERT products, which are stored exclusively under roof or optionally in closed rooms.

These risk minimisation programmes ensure that at the end of the production process the containers are largely free of internal and external contamination visible to the naked eye.

In industrial manufacturing, however, the presence of particles cannot be fundamentally and entirely eliminated. Specifically for plastic and steel packaging, unavoidable friction during opening and closing as well as static charging of the packaging material contribute to the formation or attraction of particles.

The use of wooden pallets may result in traces of sawdust or wood shavings on the surface of both IBCs and drums which may commonly detach during transport and collect on top of the packaging materials underneath.

With standard products, surface contamination due to seasonal weather conditions (e.g. pollen, snow, water stains) cannot be excluded due to the possibility of outdoor storage of the containers. For FOODCERT and CLEANCERT products the risk of such contamination is largely minimised by storage under roof or, optionally, by storage in closed rooms.

Particles and/or particles present in the atmosphere can therefore still unintentionally also get into the interior of the packaging material.

In order to minimise the risk of particle formation and the particles entering the packaging, users are advised – particularly during further processing – to keep packaging closed wherever possible and to keep the number of opening and closing procedures as low as possible. IBCs are designed and constructed for the transport, storage and handling of filling products in accordance with the relevant dangerous goods regulations.

During the use of the containers, especially in the case of multiple refilling cycles, the attachment parts such as outlet valves and screw caps as well as the associated gaskets are subject to varying degrees of wear, depending on the filling product, the type of application and the duration of use. The risk of wear increases with the frequency of use. In particular, washing procedures or improper handling during reconditioning can damage the IBC or its attachment parts. After the initial opening of the outlet valve, the container should be emptied as soon as possible and with as few intervals as possible and should be securely closed after each emptying operation.

In the case of sensitive filling products or filling product applications (e.g. for food/pharmaceutical products, coatings or electro-chemicals), it is also mandatory that the filling product is filtered during discharge or prior to further processing to largely minimise the risk of potential contamination.

The inner bottle and other components such as outlet valves, screw caps and the related gaskets could be worn by multiple use, depending on the filling product, type and duration of application. Where IBCs are used in multiple refill cycles, it is the responsibility of the distributor and/or filler to carry out the necessary quality checks in accordance with applicable regulations and to ensure that the packaging is in a proper condition. Damaged components must be professionally repaired or replaced with original SCHÜTZ components or other approved components.

1.4 – Silicones / PWIS in/on the surfaces that come into contact with products

Risk management for standard products and products produced in compliance with FSSC22000 requirements differ as described in terms of the presence of silicone and paint wetting impairment substances (PWIS) and appropriate preventive measures.

1.4.1 – Silicones / PWIS in standard IBCs (standard ECOBULK / RECOBULK / RECONTAINER), standard PE drums and steel drums

Regarding silicones in standard IBCs (standard ECOBULK / RECOBULK / RECONTAINER), standard PE drums and steel drums SCHÜTZ certifies that the raw materials, materials and auxiliary substances used to manufacture our products have been certified as silicon-free by our suppliers. Silicones are neither intentionally used nor added to the product during the production of components that come into contact with the filling material. However, it cannot be excluded that silicones or specifically PWIS (paint wetting impairment substances) may be detected as trace impurities as ubiquitous traces during the manufacturing process.

Especially in the production process for RECOBULKs and RECONTAINERs, the presence of silicones and/or PWIS cannot be excluded for the following reasons:

- Used IBCs are returned to us from all branches of industry
- The collection, storage and recycling of returned IBCs takes place within the same production area
- The IBC steel grids are cleaned with washing water from a water cycle to remove coarse, visible dirt from the grids; the risk of silicone residues and residues of PWIS in this water cycle cannot be excluded at all
- The IBC inner bottles are manufactured in the same production hall, so that airborne contamination cannot be ruled out
- The risk of indirect transfer/cross-contamination into the inner bottles by silicones and PWIS on the steel grid, e.g. through contaminated gloves, is increased for reconditioned IBCs along the entire supply chain each time the filling opening of the IBC is opened

1.4.2 – Silicones / PWIS in IBCs and PE drums from the FOODCERT & CLEANCERT product lines

For IBC- and PE-drum products from the FOODCERT & CLEANCERT product lines SCHÜTZ certifies that parts that are in contact with the filling product are free of silicones and fluorinated compounds that are capable of migration, and surfactants. This applies in the same manner for liquid, pasty, and solid materials that may release silicones, fluorinated compounds, or surfactants. These include, for example, oils, fats, protective agents, lubricants, textile auxiliaries, plastics-processing auxiliaries, hairsprays, hammer-finish paint, anti-corrosive agents, sealants, permanently lubricated sintered components, each containing silicone. It is particularly important to avoid materials based on fluorinated oils, fats or waxes, and low-molecular constituents of fluorinated polymers that are capable of migration.

In order to minimize the risk of ubiquitous traces of the substances mentioned above during the production process of FOODCERT and CLEANCERT products, up to the point when the products are loaded for dispatch special SCHÜTZ preventive programmes

apply to the product lines FOODCERT and CLEANCERT to avoid the active introduction of PWIS (paint wetting impairment substances) into the production sites. These include the following measures:

- Supplier guidelines including an exclusion note for silicones and PWIS in the supplied products and services
- Contractor guideline for the exclusion of silicones and PWIS when working at a SCHÜTZ site
- Supplier questionnaire for the exclusion of silicones and PWIS in supplier processes for the production of SCHÜTZ components
- If appropriate, supplier audits to verify that no silicones and PWIS are used in relevant supplier processes
- HACCP risk management programme at SCHÜTZ including silicones and PWIS
- “Personal hygiene” preventive programme
- BASF sample shake test on the majority of products and working materials (e.g. gloves) to confirm the absence of silicones
- Sample paint tests according to VDMA 24364 on critical products and working materials to confirm the absence of PWIS

Please note that as the name implies, all of the above mentioned actions are “risk minimization activities”. As such, these activities reduce the risk of silicones and PWIS contamination to a minimum, but do not guarantee a 100% exclusion. A detailed description of all additional preventive measures for our product lines FOODCERT and CLEANCERT can be found in the respective specifications.

1.5 - Traceability system

Our containers are marked with plant, production date and/or production order number.

For products manufactured according to the rules of the food safety management system FSSC 22000 (FOODCERT + CLEANCERT), the traceability system provides the following additional information:

- Identification of product lots
- Identification of their connection to raw material batches
- Traceability records are kept for six (6) years

1.6 - Declarations of conformity for food applications

A “Declaration of Compliance” in accordance with Regulations (EC) No. 1935/2004, (EC) No. 10/ 2011 or "Code of Federal Regulation Title 21 § 177.1520 / §177.2600 / § 178.3297 for the packaging products purchased by the CUSTOMER will be prepared by SCHÜTZ only if requested by the CUSTOMER and only for packaging from the product series FOODCERT or FDA (food commodity).

SCHÜTZ will not issue a “Declaration of Compliance” based on legal requirements for individual materials, spare parts and components, as declarations for food packaging must by law always refer to the complete packaging item.

1.7 - Labelling of food packaging materials

According to FSSC 22000, SCHÜTZ wishes to point out that the products are labelled as packaging for food contact in accordance with the internationally valid regulations of Regulations (EC) No. 1935/2004, (EC) No. 10/2011 and those of the "Code of Federal Regulation Title 21 § 177.1520, 177.2600 and 178.3297 of the Food and Drug Administration".

It is the responsibility of the CUSTOMER to ensure any additional or different labeling in accordance with local legal requirements.

1.8 - Declaration of compliance by mail / shipping documents

As described in Chapter 1.1, quality-relevant tests in the process and on the product are controlled in accordance with the definition in our management system and are uniformly structured at all locations. This allows us to ensure globally reproducible production processes for our products.

Thus, at the CUSTOMER 's request “Certificates of Compliance/Conformity“ (CoCs) can be issued in accordance with standard EN10204-2.1 (works certificates) - English: Declaration of Compliance (with the order) EN 10204:2004 (D), which certify that the packaging products that are supplied have been produced in compliance with the currently valid specification.

Additional test certificates according to standard EN 10204 are not applicable for our products and production processes.

1.9 - Processing complaints due to quality defects

The CUSTOMER must inspect the goods for any visible defects immediately after delivery by SCHÜTZ. The CUSTOMER is responsible for reporting any visible defect without delay to SCHÜTZ. If the CUSTOMER fails to make a complaint, the goods shall be deemed to have been accepted.

If a defect was not apparently visible, the CUSTOMER must report any other defect noticed at a later point to SCHÜTZ immediately after its discovery; failure to do this will mean that the goods will be deemed to have been accepted with regard to this defect.

In the event of a complaint, SCHÜTZ will confirm receipt of the complaint and, if possible, provide an initial assessment of the situation. SCHÜTZ will describe the inspection results in a complaint report within twenty (20) working days after receipt of all necessary information, documents and photos or, if necessary, after examining the original packaging which has been returned by the CUSTOMER. These reports will be sent to the CUSTOMER and will contain details of the following:

- Problem description
- Analysis of the cause
- Immediate and long-term corrective action

1.10 – Recall

If SCHÜTZ is concerned about a possible serial defect in production, especially due to an on-going complaint, SCHÜTZ will discuss with the CUSTOMER to block (filled and unfilled packaging) and accept the return (unfilled new containers only) of any packaging that might be affected.

In the event of serious quality problems within the production process which are known to SCHÜTZ and which could result in a recall, SCHÜTZ will inform the CUSTOMER immediately of this circumstance, irrespective of whether a complaint has been lodged or not.

2 - Change Management

Should SCHÜTZ become aware of any possible delivery bottlenecks, loss of production and delivery capacities or any force majeure affecting the upstream suppliers that may result in a delay or delivery failure, SCHÜTZ will inform the CUSTOMER immediately.

Generally, as well as in the event of unforeseen events, SCHÜTZ reserves the right, as described below, to switch between comparable materials, production and assembly processes as well as production sites with comparable quality management systems in order to ensure the best possible delivery reliability for the CUSTOMER while complying with the required specifications.

2.1 - Specific materials

SCHÜTZ always strives to approve several raw material suppliers in order to react flexibly to market conditions and to be able to guarantee our CUSTOMERS a high degree of supply security for our products on a global scale.

SCHÜTZ does not display the change between qualified suppliers of a material. Depending on country and availability, the suppliers of the materials may differ from each other.

It is SCHÜTZ's responsibility to ensure that the materials we use are suitable for the intended use of our packaging and are therefore comparable in quality. We ensure this by only using HDPE materials which are considered to be equivalent according to BAM-GGR 003 (EN 15507). In addition, it must be ensured that materials for food applications are suitable for food contact in accordance with the applicable guidelines (CFR Title 21 § 177.1520 / §177.2600 / § 178.3297, EC 1935/2004, EC 10/2011, EC 2023/2006). In the event of a change of supplier, SCHÜTZ will check and verify compliance.

If the packaging material is also intended for medical applications, it is imperative to consult SCHÜTZ (Technical Customer Service) separately about the specific application before the first use in order to examine and coordinate the potential applications.

2.2 - Production process and assembly

As part of the continuous improvement of our processes and products. process parameters are only changed to an extent that has positive impact on ensuring the consistent quality of SCHÜTZ products or further optimise them.

To ensure maximum flexibility and fast reaction times, several equivalent blow moulding machines or production lines are available. Order-related selection takes place within capacity

planning. SCHÜTZ is unable to provide information about possible process changes accompanying or in advance of delivery of the products.

2.3 - Production sites

All SCHÜTZ sites operate on the basis of the same management system (e.g. according to ISO 9001 and for the most part additionally according to FSSC 22000). This ensures that all plants operate according to the same processes. As a result, we can react quickly to changing circumstances and relocate production to another SCHÜTZ plant if necessary. This gives us a high degree of flexibility and guarantees our CUSTOMERS a high degree of supply security. In this context, however, we cannot announce the change of a production plant in advance.

Occasionally, it may not be possible to produce all IBC product versions (specialties) or drums at all SCHÜTZ locations. For the packaging in question, the CUSTOMER must consult SCHÜTZ about the necessary delivery terms (e.g. safety stocks) before the first delivery if separate measures need to be taken.

2.4 - Selection and specification of the packaging

SCHÜTZ's Technical Customer Service offers the CUSTOMER active and comprehensive technical support and advice in the selection of the best packaging and its application options. The advice is based on the knowledge and experience we have. According to transport law (ADR & IMDG Chapter 4.1.3.1), however, it does not release the CUSTOMER from the obligation that "[…] the user shall not select a packaging without checking that the substance is compatible with the packaging product selected […]". The final responsibility for the choice of the packaging being used therefore lies with the CUSTOMER.

Depending on the application, SCHÜTZ's consulting service is based on the standards and guidelines currently contained in international transport law (material compatibility lists, specifications for use, test specifications, etc.) of the United Nations Orange Book (Recommendations on the transport of dangerous goods), IMDG (International Maritime Dangerous Goods Code), IATA (Dangerous Goods Regulations – Airfreight), ADR / RID (international transport of dangerous goods by road or rail) and CFR49 (US Hazmat Transportation Regulations). Special local laws and regulations, especially for the use and labelling of food contact materials and articles (see 1.7), must be checked and complied with by the CUSTOMER on own responsibility.

The following main criteria are covered by the Technical Customer Service on request:

- Checking the material safety data sheets (MSDS) to ensure the compatibility of the filling products with the packaging using the assimilation process in connection with the standard liquids contained in the UN approval for dangerous goods
- Provision of a digital copy of the packaging specification selected by the CUSTOMER and any relevant appendices
- Provision of a digital copy of the “Certificate of Approval” for the transport of hazardous goods associated with the packaging specification
- Provision of a digital “Declaration of Compliance” for any food packaging
- Provision of the SCHÜTZ Handling Guide with a wide range of product and operational information regarding the safe handling of our packaging
- Provision of digital verification for the use of specific EX-protected packaging for use in defined EX-protected zones 1 + 2 or for flammable liquids of explosion groups IIA and IIB (in line with IEC 600079-20-1) with a flash point ≤ 60°C
- Further certificates on the exclusion or limit values of specific ingredients in raw materials or finished products (e.g. bisphenol A, TSE/BSE, melamine etc.)

SCHÜTZ is unable to provide detailed documents, such as detailed technical drawings with dimensions or detailed expert surveys. All primarily relevant dimensions and performance specifications for handling and proof of the suitability of the packaging under transport law are provided in the specification and, if applicable, in the “Certificate of Approval”.

2.5 - Specification

As a manufacturer, SCHÜTZ always regards its own specification as the leading document for the general description and definition of the packaging design selected by the CUSTOMER and thus the associated performance required. We will provide a digital copy of our packaging specifications upon the CUSTOMER 's request.

SCHÜTZ reserves the right to change the construction, technology, design and material of the product or individual components as long as no unreasonable changes for the CUSTOMER are related to it. The dimensions and weights given in the specifications are approximate and may vary depending on the configuration of the individual components.

All intended or necessary changes to features listed in SCHÜTZ specifications that could have an effect on the specified performance, dimensions and handling of the packaging product are generally announced well in advance of any changeover.

When changes are made, a distinction is made between:

- significant
- minor

Significant changes are alterations to:

- Characteristics that are specified
- The HDPE materials that come into contact with the filling product if these are not already listed in our dangerous goods approvals or covered by them or considered as equivalent according to the specifications of BAM GGR003 (EN 15507)
- The inner coating specification for steel packaging
- The materials that come into contact with the filling product if, in the case of food packaging, they are no longer suitable for food contact
- The design of the product, if the defined performance of the product in the new design is demonstrably not at least equivalent to the defined performance of the original design or the handling is influenced by the design changes in an unreasonable way
- Or if a specified product is discontinued

Minor changes are alterations to:

- Characteristics that are not specified

Changeover deadlines:

The CUSTOMER will be notified of any significant changes as early as possible, but at least three (3) months in advance of the planned implementation in the form of a notification of change letter containing the following information:

- description of the change (including the effect on the SCHÜTZ product)
- reasons for the modification
- a list of the SCHÜTZ products concerned
- the date of planned conversion
- availability of samples, if required

No advance notification is required for minor changes.

Within the defined periods until the changeover, the CUSTOMER has the option of checking and approving the change using an optional sample or, if necessary, selecting an alternative product from the SCHÜTZ range. Should the CUSTOMER fail to perform the approval tests within the specified period, SCHÜTZ reserves the right to carry out the conversion regardless, if the standardised production processes would otherwise be negatively impacted.

Changes of supplier are only announced if the materials of the components that come into contact with the product differ fundamentally from the materials previously used or if the performance of the products can no longer be considered as at least being equivalent because of the change of supplier.

2.6 -CUSTOMERspecification as a guiding document

If the CUSTOMER wishes to use his own specification as the guiding document, this can be accepted *after consultation.*

Based on the above provisions of the Quality Management Standard, SCHÜTZ will recognise the CUSTOMER’s specification as guiding document under the following conditions:

1. The respective specification refers to the above-mentioned internationally valid regulations of the transport law for dangerous goods packaging, which regulate the conditions for the global transport of dangerous goods. SCHÜTZ does not assume any liability for compliance with local guidelines that are not binding under transport law (e.g. VPA - Packaging Testing and Execution Guidelines of the VCI), as these often refer to CUSTOMER's product-specific applications whose details are unknown to SCHÜTZ and/or whose handling SCHÜTZ cannot influence.

2. The specification is signed by SCHÜTZ and the CUSTOMER before the first order in order to verify that both parties agree regarding the described specification. In principle, SCHÜTZ must first check any specification that goes beyond the SCHÜTZ specification to ensure that it can be implemented.

3. The CUSTOMER will proactively communicate all changes to the specification to SCHÜTZ; this document will be signed by both SCHÜTZ and the CUSTOMER, and the effective date will be updated accordingly prior to the next order to be delivered according to this specification.

4. The specification is kept separately from incoming purchase requisitions. Our staff in Order Management cannot perform a detailed check of a specification directly attached to the purchase requisition or any descriptions of the packaging product contained in the purchase requisition in text form. In principle, the last specification signed by both sides with its validity date is considered valid for the execution of the ordered packaging products.

5. Depending on the type and scope of the specification change, SCHÜTZ will again check the agreement to ensure that it remains valid.

3 – Severability Clause

Should any provision of this Quality Management Standard be or become invalid, void or unenforceable, the validity of the remaining provisions shall not be affected thereby.

The parties shall replace the invalid/void/unenforceable provision with a provision that comes as close as possible to the intended purpose of the invalid/void/unenforceable provision. This shall also apply to any unintentional gaps in the contract.

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Appendix I
Confirmation of the binding quality management standard

The following signatures confirm the validity of this document as a binding quality management standard for deliveries of packaging materials from SCHÜTZ to the CUSTOMER.

Selters, November 2023

i.V. Patrick Bauer
Manager Global Technical Customer Service

i.V. Dr. Gernot Kretzschmar
Head of Global SHEQ Management

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Version	Date	Description of Amendment
Rev03	11/2023 Linda Bisping	• Update “1.3 - Cleanliness of the surfaces that come into contact with the filling product / cleanliness of the container exteriors” due to new wording of the Schütz disclaimer
1	10.11.2023 Torsten Merz	• Transfer to xECM with assignment of new PID number
2	11.07.2025 Torsten Merz	• Layout adjustment • Adjustment of DE and EN documents to one PID number
3	16.07.2025 Torsten Merz	• Workflow for standardizing the DE / EN / FR version of the document

The workflow for approval can be reviewed via xECM.