



**INTEGRATED
MANAGEMENT
SYSTEM MANUAL**

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FULLA	FULLA TRADING COMPANY
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Integrated Quality System Manual

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ISO 9001:2015



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ISO 45001:2018



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ISO 14001:2015



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1. PURPOSE

The purpose of the Integrated Management System for Quality, Health, Safety, and Environment is to summarize and describe: the organization of the company, the needs and expectations of all interested parties, the field of application, the management system, the Leadership, focus on Customers and Suppliers, different Policies established, risks and opportunities of: objectives, planning, all resources, people and infrastructures, procedures and skills. According to these we work in full awareness towards the achievement of the services' provision, products and services constantly subject to checks, measurements and continuous improvements over time; also thanks to the involvement of the corporate authorities, starting from the Management that supervises plans and evaluates every activity already performed and/or to be carried out.

2. REGULATORY REFERENCES

- ISO 9001: 2015 Management System for Quality
- ISO 14001:2015 Management System for Environment
- ISO 45001:2018 Management System for Safety

3. TERMS AND DEFINITIONS

- Management: Person or group of people who manages and controls a company at the highest level.
- Environment : Context in which a company operates, including air, water, land, natural resources, flora, fauna, human beings and their interrelations.
- Work environment: Set of conditions within which the work is performed.
- Environment for processes operation: Monitoring and description of the infrastructures and of the people involved in the activity processes.

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- **Risk analysis:** global process of definition of the quantity of risk and determination of its tolerability.
- **Process Approach:** Desired result that is obtained with greater efficiency when the relative resources and activities are managed as a process.
- **Environmental aspect:** Element of the activities or products or services of an Organization that interacts or can interact with the Environment.
- **Audi :** Systematic, independent and documented process to obtain audit evidence and evaluate it objectively, in order to establish to what extent the audit criteria were met.
- **Company:** The complex of any organization and economic body responsible for implementing the requirements of the Quality, Environment and Safety regulations, including all personnel (administrators, managers, management, supervisors and non-managerial staff, whether hired directly, on contract or otherwise representing the company).
- **Corrective Action:** Action planned following the evaluation of the severity and causes of the detected / existing Nonconformity, with the aim of eliminating its effects, causes and preventing its recurrence.
- **Characteristic:** Distinctive element.
- **Life Cycle:** consecutive and interconnected phases of a system of products (or services), from the acquisition of raw materials or from the generation of natural resources to final disposal.
- **Life Cycle :** Time period indicated by the Manufacturer related to the duration of the product generated, strictly treated and intended as prescribed and specified
- **Customer:** Organization or person receiving a product or service from the Supplier.
- **Competence:** Ability to apply knowledge and skills to achieve the expected results.
- **Conformity:** Satisfaction, full compliance with specified requirements.
- **Consultation:** Research of opinions before making decisions in the Environmental and Occupational Health and Safety fields.

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- **Quality Control:** The operational techniques and activities implemented to meet the requirements.
- **Environmental condition:** State or characteristic of the Environment as determined at a specific time.
- **Effectiveness:** Degree of realization of planned activities and achievement of planned results.
- **Evidence (objective):** Given that it testifies or supports the existence or truthfulness of a document, an event, an activity, an action.
- **Supplier:** Organization or person who provides a product or service to the Customer.
- **Guarantee or Quality Assurance:** Set of planned and systematic actions necessary to give adequate confidence that a product or service meets certain requirements.
- **Hazards identification:** Process of recognition of the existence of a hazard and definition of its characteristics.
- **Environmental impact:** negative or beneficial change of the environment, caused totally or partially by the environmental aspects of an organization.
- **Accident:** Event deriving from a job or that originates during a job and that may cause or that effectively causes Lesions and Diseases.
- **Indicator:** Ambivalent term that identifies both the object of a measurement and the parameter (unit) by which the object itself is measured. Select a certain activity and the indicators applicable to it, the indicator measures the level of approach or deviation from the standard.
- **Documented information:** Documents that define the Policies, responsibilities, activities and describe the Management System in general. They must be kept under control and maintained by the Organization and through the container.
- **Infrastructure:** System of means, equipment and services necessary for the operation of an organization.
- **Worker:** Person who carries out a job or a work activity in the company.
- **Injury and Illness:** Negative effects on the physical, mental or cognitive condition of a person, of a Worker, which include occupational disease, illness and death.

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- **Workplace:** Place under the control of the company where a Worker needs to find himself or go for work reasons.
- **Continuous improvement:** Recurring activity aimed to increase performances and the ability to meet the requirements. Continuous improvement is a permanent goal. The purpose of Continuous Improvement of the Integrated Management System is to increase the probability to enhance customer's satisfaction and of all the interested parties. The actions taken for this improvement include: the analysis and evaluation of the existing situation (from the Management Review) in order to identify the areas to be improved, the objectives, the research of possible solutions to pursue them, the feedback from the Customers and Interested Parties, Inspections, annual verification, analysis and evaluation of the results of the implementation to establish whether the objectives have been achieved, the formalization of the implemented changes. The results are then re-examined to identify further opportunities of improvement, giving rise to a continuous activity.
- **Measurement:** Process to determine an indicative value.
- **Mitigation:** Action planned following the assessment of the seriousness of the detected / existing Nonconformity, with the aim of limiting the effects and the causes where it is not possible to eliminate the repetition of the event.
- **Monitoring:** Continuous determination over time of the status of a system, a process or an activity.
- **Nonconformity:** Failure to meet a requirement.
- **Compliance obligations (legal requirements and other requirements:** These are all the legal requirements that an organization must meet and other requirements it wants to satisfy.
- **Objective (improvement) :** Parameter and indicator used by the Company to carry out periodic monitoring of the results of internal processes, as well as to verify the adequacy of its Policy, in order to reach a higher level than the minimum standard established or defined by the Organization, referring to Quality, Environment and Safety.
- **Opportunities:** Circumstance or series of circumstances that can lead to improved performance and offer potential positive effects.

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- **Organization:** Set of people and means, with defined responsibilities, authorities and interrelations.
- **Outsource:** Enter into an agreement through which an external organization performs part of a function or a business process.
- **Participation:** Involvement in decision-making processes related to Environment and OSH.
- **Interested Party:** Person or Organization that can influence, or be influenced by, or perceive itself as influenced by a decision or activity.
- **Danger:** Source having the potential to cause injury and / or disease, damage, situations or dangerous circumstances.
- **Planning:** Part of the management aimed at establishing the objectives and specifying the operational processes and the relative resources necessary to achieve these objectives, defining the sequence of activities to be performed.
- **Policy:** It is established to provide the general guidelines of an Organization regarding Quality, Environment and Safety, formally expressed by Senior Management. It identifies the results to be achieved by assisting the Organization in using the resources to do so. The Policy provides a reference framework to establish and review the objectives for Quality, the Environment and Safety; objectives that must be measurable and consistent with the commitment for a continuous improvement, achieved these it is possible to lead to the positive impact on the conformity of the product, service, economic and financial performance, and the satisfaction of all interested parties.
- **Performance:** Measurable result, in production, quality, environment, health and safety.
- **Pollution prevention :** Use of processes, practices, techniques, materials, products, services or energy sources to avoid, reduce or control (separately or in combination) the production, emission or discharge of any type of pollutant or waste, in order to reduce negative environmental impacts.

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- **Procedure (documented):** Document that describes the operating methods, resources and responsibilities for the management and execution of activities, processes or part of them.
- **Process:** Set of related or interacting activities that transform incoming elements into outgoing elements. The incoming elements of a Process generally come from items outgoing from other processes. The processes of an Organization are usually planned and executed under controlled conditions in order to add value.
- **Products and Services:** Results of activities or processes.
- **Project:** Process in its own right which consists of a set of coordinated activities and kept under control, with start and end dates, undertaken to achieve and achieve a goal that meets the requirements contemplating time, cost and resource limits.
- **Programming:** Definition and timing of the activities to be carried out.
- **Quality:** Degree in which a set of intrinsic characteristics meets expectations and quality requirements.
- **Registration:** Document reporting the results, providing evidence of the activities performed and measurements.
- **Requirement:** Requirement or expectation that can be expressed, generally implicit or mandatory.
- **Review:** Activity carried out to check the suitability, adequacy and effectiveness object of the review itself in order to pursue the established objectives.
- **Traceability:** Ability to trace the history, use, location of what is being considered.
- **Risk:** Effect of the uncertainty given by the deviation from the expected, can be positive or negative.
- **Risk for OSH:** Combination of the probability that one or more dangerous events or exposures will occur in relation to the work and the severity of the injury or damage that can be caused by the event or exposure.

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- **Safety:** Set of actions, activities and intrinsic characteristics that meet the requirements for the respect of safety in the workplace.
- **Integrated Management System :** document and organizational system, including the organizational structure, planning activities, responsibilities, practices, procedures, processes, instructions and resources implemented for the management of the company, to keep policies active for Quality, to manage the aspects relating to the Environment by fulfilling the obligations of compliance by addressing Risks and Opportunities, to achieve the policy for Health and Safety at Work (OSH) in full compliance with the law.
- **Standard:** Minimum quality level guaranteed by the company, whether imposed by the Public Administration, provided for in a Contract, voluntarily defined within a procedure.
- **Calibration:** Set of operations that establish the relationship between the values indicated by a measuring instrument and the corresponding known values of a measured.
- **Validation:** Confirmation, supported by objective evidence, that the requirements relating to a specific intended use or application have been met.
- **Verification:** Confirmation, supported by objective evidence, of the fulfillment of specified requirements.
- **Customer Satisfaction:** Perception of the present and future, implicit and explicit needs of the Customer, respect and satisfaction of its requirements and exceeding the same expectations of the Customer.
- **Stakeholders:** Individuals inside or outside the company, with different interests and needs, able to influence the choices and behavior of the company and condition its success.

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ACRONYMS CHART

Acronym	Definition
CA	Corrective action
PUR	Purchases
MNGT	Management
ATCH	Attached
PSO	Prevention Service Officer
DC	Document Control
QC	Quality Control
SM	Sales management
GM	General Management
H/O	Head Office
QRD	Quality Registration Document
TECH DEPT	Technical Department
HR	Human Resources (Worker, Employee)
QM	Quality Management
WI	Work Instructions
WHS	Warehouse
Mod	Model
NC	Non-compliance
IOP	Internal Operating Procedure
AM	Administration Manager
TM	Technical Manager
QCWP	Quality Control Working Plan
QM	Quality Manager
WSR	Worker safety representative

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PSM	Prevention Service Manager
IMS	Integrated Management System
SMS	Security Management System
TEC	Technician

“O” = functional abbreviation for Operator (example: “generic” of HR = OHR)

“R” = functional acronym which stands for Responsible (example: of HR = RHR)

Responsibility for the correct use of the glossary is left to those who work in the Integrated Management System so that each individual can unambiguously interpret each symbol and term used in the documentation. The QM is responsible for verifying the terms and initials proposed by the OHR and updating the glossary.

4. COMPANY FRAMEWORK

COMPANY

BUSINESS NAME : FULLA TRADING COMPANY

Telephone and Fax

Website address

E-mail

HEADQUARTER

3522 Ibn Al Amed st, 6190 Aljazeera district, Riyadh, Saudi Arabi

ACTIVITY

Chemical & Petrochemical Trading.

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4.1 THE COMPANY AND ITS FRAMEWORK

The Management, assisted by the relevant figures, identifies and analyzes the internal and external factors; whether positive or negative, relevant for the achievement of the objectives and that can influence the achievement of the expected results. Control and monitoring takes place periodically, including on the Work Plan, through QCWP, audits and monthly reviews, based on the factors described below.

SUBJECT	INTERNAL FACTORS	ESTERNAL FACTORS	COMPETENCES
Product or Service (Quality)	- Customer Satisfaction - Quality expectations - Delivery within the terms	- Supplier support - Customer changes	- Management - Quality Manager - Quality control officer
Environment	- Regulatory compliance - Learning of staff - Constant control	- Disposal management from company in charge - Official releases	- Management - Document Controller - RSPP
Safety	- Regulatory compliance - Staff learning - Constant control	- Official releases - - New regulations	- Management - RLS - Document Controller - RSPP
Market	- Customer needs - Production flexibility - Timing	- Global request - New projects	- Marketing Officer
Territory	- Geographical knowledge and its development - Potentials cognition	- planning changes - Regulatory news	- Management
Economy	- Financial availability - Cost of labor - Tax system	- External investors - Credit access - New proposals	- Management
Policy	- Status awareness - Definition	- Global Finance (Stock Exchange) - New administrations - Government provisions	- Management - Marketing Officer

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Human resources	- Employee expectations - Health & Safety - Qualifications and skills - Religion, customs, traditions - Continuous training	- Opening new orders - National contract - Rules and Laws	- Management - RSPP - RLS - Employees
Infrastructure	- Cutting-edge equipment- Control equipment - Technological supports	- New technologies - Rules and Laws - Possibility of extension	- Management - RSPP
Suppliers	- Confirmation of product validity - Immediate delivery - Product / service certification - Product / service cost	- Contracts and agreements - Normative certification- Change in prices - New products / services	- Management - Quality Manager - Purchasing Office
Customers	- Special needs - Loyalty - Communication and reports	- Competitor presence - Brand knowledge - Qualification	- Sales Office (Sales) - Marketing Officer- Management
Competitor	- Continuous monitoring - Contacts and comparisons	- Surrounding presence - New activities and services - Best offers	- Management

4.2 NEEDS AND EXPECTATIONS OF THE INTERESTED PARTIES

FULLA TRADING COMPANY identifies as Interested Parties for Quality: Customers, Suppliers, Manager, Employees, Quality Control Manager, PSM, WSR, Document Controller, Marketing Officer , the Purchasing Office and the Commercial Office (Sales), the Management and last but not least the Management. Parties for which it recognizes their needs and expectations.

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MOST RELEVANT PARTS FOR THE QUALITY FACTOR

STAKEHOLDERS	NEEDS	EXPECTATIONS
Management	- Decision-making and purchasing power - Access to all information - Direct contact with all authorities Internal and external interested parties - Constant input of information from each other interested party - Annual questionnaires, audits and reviews	- Execution of what was given - Respect of contract, legislation and legislation of each Interested Party - Communication and involvement among all interested parties
Quality manager	- Constant achievement of quality standard required - Direct relationship with Quality Manager and Head Manager - Constant information on processes - Respect for each established term - Non-compliance Report and Review	- Adequate skills and competences from part of subordinates and employees - Timely communications - Detailed Process Reports - Constant professional growth - Continuous improvement
Quality control manager	- Constant achievement of quality standard required - Equipment's control adequate - Directives from the Quality manager - Non-compliance Report	- Adequate skills and competences from part of the employees - Collaboration with Head Manager Quality - Communication of Nonconformity
/ person in charge	- Adequate skills and competences from part of the employees - - Precise information on the product / service to perform / provide	- Collaboration with Head, Quality and Sales Managers and office staff - - Communication with Senior Management, with employees and the person in charge - Recognition of his authority

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Manager and Employees	- Continuous training - Provisions from the Manager, by the Manager and by Quality Manager - PPE, tools and equipment - Knowledge and preparation	- Information and instructions from Quality Managers - Collaboration with WSR
Document Controller	- Communication with interested parties	- Collaboration with Interested Parties
Customers	- Quality standard satisfaction - Respect delivery terms- Economic reductions - Post sales assistance - Company certification - Defined contracts	- Assistance when requesting an offer - Appreciable discounts- Always better timing - Changes always possible
Suppliers	- Defined contracts	- Security on business solidity - Flexibility on delivery times

RELEVANT PARTS FOR THE QUALITY FACTOR

STAKEHOLDERS	NEEDS	EXPECTATIONS
Marketing Manager	- Knowledge of business economics - Knowledge of the sector / market - Knowledge of the financial market	- Collaboration and communication with Management - Derogation of decision-making power - Information from the Sales Department
Sales Department	- Knowledge of the service - Non-compliance Report - Knowledge contracts with customers	- Collaboration with Purchase Department- Respect of the terms of production in

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		quality and timing - Flexibility on economic deviation - Feedback from customers
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FULLA TRADING COMPANY identifies as Interested Parties for the Environment: Suppliers, Manager, Employees, RSPP, Senior Management and last but not least Management. Parties for which it recognizes their needs and expectations.

RELEVANT PARTS FOR THE ENVIRONMENT FACTOR

STAKEHOLDERS	NEEDS	EXPECTATIONS
Head Management	- Decision-making power - Access to all information - Direct contact with all authorities - Internal / external interested parties - - Constant input of information from each other interested party - Annual questionnaires, audits and reviews	- Execution of what was given - Legislative and regulatory compliance of each interested party - Communication and involvement among all interested parties
person in charge	- Adequate skills and competences from part of the employees - Precise information on the work - Non-compliance Report and Review	- Communication with Head Management, with employees and the person in charge - Recognition of his authority
Officer and Employees	- Continuous training - PPE, Instructions, Procedures - Knowledge and preparation	- Information and instructions from the Head Management - Collaboration with PSM
Suppliers	- Detailed indications of the products	- Product characteristics
PSM	- Non-compliance Report and Review - Inspection visits - Compliance with regulations and laws - Communication with Head Management	- Collaboration with Head Management, Person in charge and employees - Compliance with regulations - Continuous information on each activity

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	- Free access to each department	
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FULLA TRADING COMPANY identifies as Interested Parties for Security: Customers, Suppliers, Manager, Employees, , RSPP, and RLS, Senior Management and last but not least Management. Parties for which it recognizes their needs and expectations.

RELEVANT PARTS FOR THE SAFETY FACTOR

STAKEHOLDERS	NEEDS	EXPECTATIONS
Head Management	- Decision-making and purchasing power - Access to all information - Direct contact with all authorities internal and external interested parties - Constant input of information from each other interested party - Annual questionnaires, audits and reviews	- Execution of what was given - Respect of contract, legislation and legislation of each Interested Party - Communication and involvement among all interested parties
High Management	- Adequate skills and competences from part of the employees - Precise information on how to perform the job - Availability of PPE, of equipment, of adequate tools - Non-compliance Report and Review	- Collaboration with PSM and WSR - Communication with Head Management, with employees and the person in charge - Recognition of his authority
Production Manager / Supervisor	- Continuous training - Provisions from the Manager of Production, by the Manager and by Head Management	- Information and instructions from the Production Managers and from responsible - Collaboration with RSPP and RLS

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	- PPE, tools and equipment - Knowledge and preparation	
Customers	- Safety standard satisfaction - Legislative and regulatory compliance - Induction and education on the site - Company certification	- Assistance on the site - PPE supply on the site - Document supply
Suppliers	- Detailed indications of the products	- Product safety
PSM	- Non-compliance Report and Review - Inspection visits - Compliance with regulations and laws - Communication with Head Management - Free access to each department	- Collaboration with Head Management, Manager, Production Manager and WSR - Compliance with regulations - Continuous information on each activity
WSR	- Non-compliance Report and Review- Inspection visits - Compliance with regulations and laws - Communication with Head Management - Free access to each department - Direct contact with all staff	- Collaboration with Head Management, Manager, Production Manager and PSM - Continuous information with staff

4.3 APPLICATION FIELDS

The Integrated Management System for Quality, Environment and Safety described in the FULLA TRADING COMPANY Manual has as its primary purpose the synthesis and the description of all the management activities of the services provided in general and of the supply orders in terms of planning, implementation, verification and standardization.

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The priority objectives are the guarantee of Quality, Safety and Environmental Respect in the provision of the service offered, the achievement of the satisfaction of its Customers, its Employees and Employees, neighboring Populations, its Stakeholders in general, the achievement and maintenance of efficiency in the workplace, the training and information of workers, the conscious and active involvement of head management and all the figures related to it. This System is applicable to all Departments, Functions, Entities, Services involved by FULLA TRADING COMPANY based on the sequence of activities related to the processes of Providing Calibration Services for Mechanical and Electrical Instruments, temperature and pressure Devices, testing of circuit breakers and switchgear assembly and dimensions equipment's, mass and weight machines and systems

4.3.1 QUALITY MANAGEMENT APPLICATION FIELD

The FULLA TRADING COMPANY activities are carried out under the Directives, Procedures, Operating Instructions and Controls determined and implemented by the Customer, or rather FULLA TRADING COMPANY is a third party supplier and adopts the Quality Plan required and defined by the Customer, checking compliance with the cogency in each phase of internal realization as in any eventual process in outsourcing mode.

The External Quality Factors refer to the Support of the Supplier, and the Modifications requested by the Customer; while Internal Factors refer to Customer Satisfaction, Quality Expectations and Product Delivery within the established terms.

The FULLA TRADING COMPANY provides activities of : Chemical & Petrochemical Trading.

4.3.2 ENVIRONMENT MANAGEMENT APPLICATION FIELD

The services that are part of FULLA TRADING COMPANY's activities involve the use of materials, products, systems and spaces subject to monitoring, certification and regulations that dictate the management criteria for environmental compliance, by the assigned staff that is trained with regards to the use.

External Factors for the Environment refer to the management of disposal assigned to a company with a contract, and to the Official Announcements; while Internal Factors refer to regulatory compliance, the level of staff learning and constant control over what is put into practice by all.

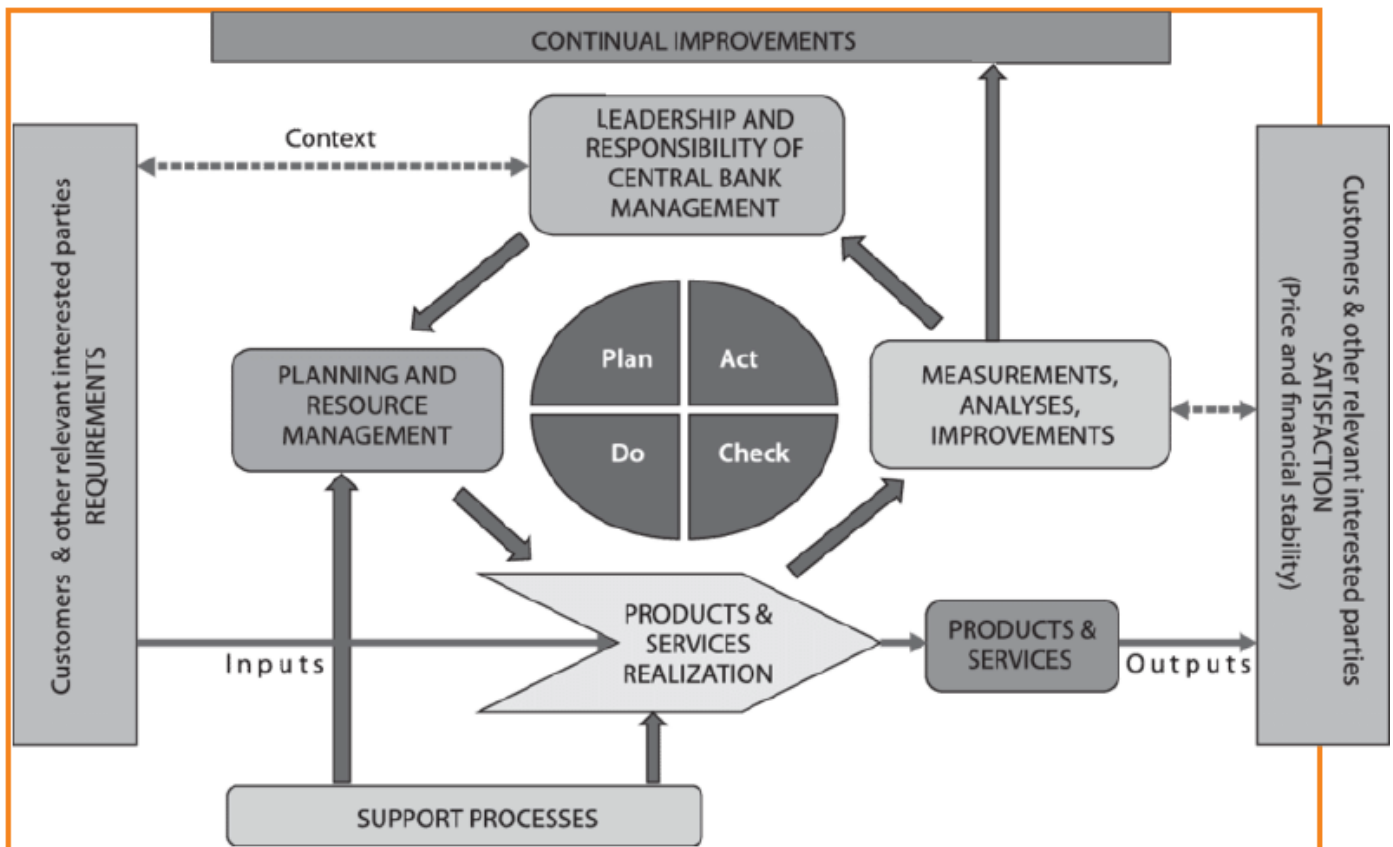
4.3.3 SECURITY MANAGEMENT APPLICATION FIELD

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The FULLA TRADING COMPANY has the direct responsibility in the management, maintenance and control of the Administrative Commercial Offices and of the Technical Office, of the Machinery and Measurement Instruments owned by it, of Safety in the Workplace (ISO 45001). External Security Factors refer to Official Announcements and New Regulations; while Internal Factors refer to regulatory compliance, staff learning and constant monitoring of what has been put into practice by all. The design, productive, administrative and commercial part is under the direct control of FULLA TRADING COMPANY

4.4 MANAGEMENT SYSTEMS AND RELATED PROCESSES

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5. LEADERSHIP

5.1 LEADERSHIP AND RESPONSIBILITY

5.1.1 OVERVIEW

The Head Office, in its entirety, is involved in the processes and motivates every resource to achieve the objectives related to Quality, Environment and Safety. Through the management review, the objectives and strategic directions monitor all the activity as a whole, managing each peculiarity. In the field of Safety, it assumes full responsibility for prevention in relation to health and safety in the workplace, ensuring that the Policy is established integrating the requirements of the OSH System to achieve the expected results, having the resources necessary for maintenance and for the improvement of its own management, training and communicating the importance of the effectiveness of this aspect, it supports the people in their contribution by promoting the culture in this sense and protecting them from retaliation consequence of the reports of accidents or dangers or risks,

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finally supporting the responsible institutions. In the environmental field, it considers the effectiveness of the management, ensuring that a precise policy is established concerning objectives compatible with the context of the company, integrating it with the requirements of the management system, ensuring the availability of the resources necessary to achieve the expected results, communicating the importance and promoting the continuous improvement of this aspect, supporting all corporate roles in the commitment of maintaining the management of the Environmental factor. In the Quality area, the Head Management is committed to the continuous improvement of the performances, exercising a function of direction and control through the Management System ensuring its effectiveness in achieving the objectives and the efficiency in the optimal use of the resources; the operational strategies aimed to satisfy and define the requirements of all the interested parties, materialized in the Policy and in its definitions relating to performance; the DE commitments are communicated in a transparent and procedural manner, motivating all staff to fully participate; the best expected result is achieved by assessing the evolution of expectations and satisfaction by the interested parties, through an audit, assessing the risks and the process-based approach, respecting the legislative and contractual compliance of what is produced or supplied.

5.1.2 CUSTOMER FOCUS

Attention to the Customer is one of the main components for the organization of processes and for structuring the implementation of the Integrated Management System, as well as the commitment to define the Policy and objectives. The focus on the Customer is therefore not exclusively focused on the Quality factor, but also on Safety and Environment, with the intention of providing a 360-degree certified service, guaranteeing exhaustive coverage and compliance with the law and legislation during the operating, producing and serving phases; this is possible through the continuous monitoring of all the activities, at every stage, through the recording of information and the use by everyone, not only the Customer, of the results obtained.

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5.2 POLICIES

5.2.1 ESTABLISH POLICY FOR QUALITY, ENVIRONMENT, SAFETY

With the start of the Directional Plan for the implementation of an Integrated Management System for Health, Safety, Environment and Quality in the Workplace, the General Management of FULLA TRADING COMPANY. Under takes to verify, with renewed attention, the needs and expectations of the Customers, the Personnel, the territories involved in the provision of services, transforming these into requirements to improve the quality of processes and activities in full respect of the environment and the Health & Safety. To uniquely address the choice of strategies, the Management defines the Policies by making a specific Document and divulging them within the company, ensuring its understanding through the exhibition on the bulletin board and the annual meeting with all the staff. The Policies are reviewed annually in order to verify their adequacy, setting themselves as objectives: search for optimization of business processes; development of the ability to respond and anticipate the needs and expectations of the interested parties; involvement of each employee making him feel an important part of the implementation of the Policies; maintenance of conformity in accordance with the rules related to the company activity.

POLICY FOR QUALITY

It is a precise commitment of the Management to activate a certifiable Quality Management System that allows the company to:

- Identify customer needs and expectations
- Identify the organizational levers for the purpose of continuous improvement
- Identify and review Quality objectives

The correct application of the Integrated Management System therefore allows the General Management to monitor the factors essential to the life of the company. These factors are:

- Customer / Customer satisfaction level
- Requirements of other parties involved in the business
- Opportunities for continuous improvement
- Resources necessary for continuous improvement

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For this purpose the Management assumes the responsibility of:

- Ensure the consistency between quality objectives and company strategies
- To disseminate and understand the quality objectives for all internal and external personnel
- Demonstrate commitment for the implementation of the management system for the Quality
- Make available the necessary resources to achieve the Quality objectives
- Guide the entire organization towards continuous improvement

In order to ensure the implementation of the Quality Policy, FULLA TRADING COMPANY commits to:

- Monitor all activities that influence Quality
- Collect and analyze the data that allow to define and implement appropriate preventive actions aimed to eliminate the causes of potential nonconformities
- Feed the motivations of the Personnel through the implementation of growth professional programs aimed to every level of the company, and raising awareness about Quality
- Optimize the overall efficiency of the company through accurate and continuous resource management- Review the context factors and the needs of the interested parties by identifying and evaluating system's risks and opportunities
- Give a management structure to the company that guarantees a clear definition of tasks and responsibilities
- Implement useful working methods to manage the activities in a controlled manner and apply them for continuous improvement
- Manage all processes (internal and external) through the "Plan Do Check Act" method (PDCA), standardizing and designing them to make them effective
- Informing, training, raising awareness among staff, stakeholders and managers, in order to understand at every level the guidelines and objectives
- Implement effective methodologies for updating the applicable legal requirements
- Periodically evaluate, through internal audits, the compliance of the Management System to the reference Standard, to the Policy and to what planned and programmed, verifying the achievement of the set objectives
- Continuously improve the Management System based on the results of the Review
- Pursue the continuous technological innovation of work equipment and equipment measuring instruments in order to increase production capacity

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POLICY FOR ENVIRONMENT

The FULLA TRADING COMPANY is committed to pursue a policy of protecting the environment for sustainable development. The General Management therefore undertakes to promote any direct protective action, preventing any form of pollution and pursuing the continuous improvement of its environmental performance when economically and technically possible.

Within the framework of this Policy, the following objectives are set in relation to the environmental context in which FULLA TRADING COMPANY.

Carries out its activities:

- Protection of soil and subsoil
- Protection of surface and underground water bodies
- Breathing air protection
- Guarantee that the choice of new technologies offers greater environmental protection
- Development of training, awareness and training activities for environment protection
- Full compliance with environmental legislation and regulations
- Full compliance with the obligations imposed by authorizations or permits issued by the authority in charge
- Collaboration with the neighborhood, the authorities, the Customers, the Suppliers and with the workers for the promotion of a culture that favors the protection of the Environment for sustainable development
- Continuous improvement to increase environmental performance
- Satisfaction of compliance obligations
- Maintenance of documented information
- Communication within the organization
- Availability of all interested parties

Management ensures that the responsibilities and authorities for the relevant roles are assigned and communicated within the organization, in order to ensure that the Environmental Management System complies with the requirements of the International Standard and to be informed about the performance of the Environmental Management System.

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POLICY FOR HEALTH AND SAFETY AT WORK

FULLA TRADING COMPANY sets itself the prior objective of adopting the Safety Policy as an indispensable element for safeguarding the Safety and Health of people and of the Work environment.

It is the will of FULLA TRADING COMPANY. Operate in compliance with the safety of its employees, its customers and the people who live near its operational and transit centers, preventing the occurrence of accidents and mitigating any possible harmful effects on people, property and the environment.

FULLA TRADING COMPANY has established a Safety Management System “SMS” in order to ensure that its activities are carried out in safe conditions, inspired by the principles of this Safety Policy expressed by the company management. **FULLA TRADING COMPANY. adopting the principle, according to which the safe operation of a given**

Installation, vehicle, equipment depends on the overall management criteria, has the objective of considering the Safety Policy as an integral part of the Company’s Integrated Management System. FULLA TRADING COMPANY. Provides to develop issue and implement health and safety plans.

The General Management, in order to continuously improve training within the organization, in order to develop a “safety culture” and to obtain a series of advantages and savings such as: - Reduction of injuries

- Prevention of the onset of occupational diseases**
- Elimination of the turn-over for the replacement of injured and sick people**
- Reduction of insurance costs**
- Reduction of the risks of administrative and criminal penalties**
- Full application of Legislative Decree 81/08 and subsequent**

FULLA TRADING COMPANY. Has created a company security management system to comply with legislative requirements, obtaining more improvements in terms of management. The reference standard adopted is ISO 45001.

In order to ensure the implementation of the Security Policy, FULLA TRADING COMPANY. Commits to:

- Monitor all the activities that influence Security on the services provided**
- Collect and analyze the data that allow to define and implement appropriate preventive actions aimed to eliminate the causes of potential nonconformities**

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- Feed the motivations of the Personnel through the implementation of growth professional programs, and raising awareness about safety, at every level of the company
- Optimize the overall efficiency of the company through careful management of the resources

5.2.2 COMMUNICATE POLICY FOR QUALITY, ENVIRONMENT, SAFETY

The Policies are communicate and disclosed to all FULLA TRADING COMPANY staff by posting notices, procedures and work instructions on the bulletin board, as well as during meetings and training courses.

Even periodic internal audits, which contribute to maintain a high level of attention and awareness in favor of the legislative requirements and the objectives that the company is prepared to cover and achieve, are a valid means of communication to all interested parties.

5.3 ORGANIZATIONAL ROLES, RESPONSIBILITIES, AUTHORITIES

Head Management defines the responsibilities and authorities in the area of processes and activities through the drawing up of the organization chart and through the internal appointments of the key figures in charge of performing the functions, who cover the roles related to production control such as those related to administrative aspects in general. Each role is explained in the organization chart always visible and available on the notice board.

At the same time as the annual review, the roles are re-evaluated and, if necessary, improved in the tasks, or replaced by other individuals, it should be impossible to correct or mitigate the deficiencies that have occurred.

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6. PLANNING

6.1 ACTIONS TO ADDRESS RISKS AND OPPORTUNITIES

The risk-based approach (Risk Based Thinking) is the foundation of FULLA TRADING COMPANY for planning the entire management system. The risk is managed as a determination of itself, as well as the opportunities associated with the processes aimed to focus on the Customer meeting the requirements and needs. In this regard, please refer to the “Activity Monitoring”. In order to delimit, implement and improve the Integrated Management System, the company analyzes and considers the variables of its context, classifying the interested parties and their needs, identifying and mapping the strategic risks of the System.

Context analysis aims to determine the factors that influence the objectives. In order to ensure that the Management System pursues the expected results, the company focuses on preventing or mitigating the undesirable effects that may affect the company, achieving continuous improvement. Within the field of application defined for the System, the company determines what could be the potential emergency situations that can impact on Quality, Environment, Health and Safety, keeping documented information on risks, opportunities and processes.

6.2 QUALITY, ENVIRONMENT AND SAFETY OBJECTIVES - PLANNING

The objectives and planning are summarized in the “Activity Monitoring”, in which each evaluation and every action includes corporate strategies, market analyzes, customer requirements, mandatory requirements, process analyzes, risk analyzes, and interested parties and risks, both positive and negative. Planning is part of the interactive sphere of the “Activity Monitoring” itself, with the values of the efficiency constantly changing looking forward continuous improvement, monitored for each process of each department; action is taken where action is needed to improve the process phase.

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6.3 REVISIONS SCHEDULING

The analysis of the Audits and the Management Review lead to the planning of the changes to be made to each single phase of each business process; changes may also be necessary due to external factors, such as the introduction of new products, or new markets, or customers, or suppliers. The programming of the changes is managed subsequently to the Management Review and reported under the heading “Improvement / mitigation program” on the “Activity Monitoring” file.

7. SUPPORT

7.1 RESOURCES

FULLA TRADING COMPANY determines and provides the necessary resources to establish, implement, maintain and improve the Integrated Management System.

7.1.1 OVERVIEW

The FULLA TRADING COMPANY take advantage of the provided qualified and trained personnel to perform the assigned tasks, with also tested and competent external collaborators for the various support processes, of suppliers evaluated over time both in the product and in the service offered, of infrastructures and structures studied ad hoc to satisfy every specific process, every need and expectation of the Customers and to implement, update and improve all the processes of the Integrated Management System.

7.1.2 PEOPLE

The people involved in the FULLA TRADING COMPANY complex are all equipped with PPE and suitable clothing, adequately trained in terms of safety in the workplace, in terms of respect for the environment and in terms of quality.

In addition to the training courses imposed by Legislative Decree 81-08, the FULLA TRADING COMPANY organizes specialization courses on the use of products specifically requested by the Customer, with a certificate issued by the manufacturer.

All FULLA TRADING COMPANY personnel have a record, each card shows the working and training life of each individual employee; as well as the task, the main activity, the peculiarities and the assignment, as well as strictly personal data. In the

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Organization chart and in the EMU table (Emergency Management Unit) are reported the corporate duties related to safety assigned to each one.

7.1.3 INFRASTRUCTURES

Every week every department is checked in its physical and organizational integrity; the workers in charge of the control carry out inspections on instruments, work area, equipment, tools and materials, providing at the end a Check-List which will give rise to a weekly Report to be delivered to the Management.
On a monthly basis, a worker in charge of the inspection carries out a global inspection by providing a Report to be delivered to the Management.

7.1.4 ENVIRONMENT FOR OPERATING PROCESSES

FULLA TRADING COMPANY continuously offers an environment that helps the productivity to the staff and the people who intervene in its complex for any type of service. Productivity in all its meanings, cooperativeness , convenience and interactivity, all considering the infrastructural effectiveness and functionality, in full compliance with current regulations related to safety and environment, with particular attention to the qualitative level requested by every customer.

7.1.5 RESOURCES FOR MONITORING AND MEASURING

7.1.5.1 OVERVIEW

Each phase of the production process undergoes continuous and constant checks through special instruments and by dedicated personnel for quality control. The quality manager is responsible for approving any completed work.

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7.1.5.2 MEASUREMENT TRACEABILITY

The person in charge of measurements uses training, experience and continuous training to carry out measurements, tests, checks, monitoring, with or without direct inspection from the Customer or his appointed intermediaries. The different instruments and devices used for the measurements, listed in the Instrument List, are periodically tested with the release of new Technical Data Sheets and new Certificates of Conformity that can be internal or external in cases where only the motherhouse has the possibility to verify and calibrate again the tool. Each measurement carried out is reported in the 3.1 Certificates issued to the Customer.

7.1.6 ORGANIZATIONAL KNOWLEDGE

FULLA TRADING COMPANY acknowledges all internal and external personnel with all the information regarding the activity, in order to achieve the set objectives, through periodic meetings and instructions posted on the notice board; individual experience and ability, the exchange of experiences with customers and suppliers, not least the successes achieved, as well as failures, these contribute to increase the cognitive level of the interested parties.

7.2 COMPETENCES

All workers, at every level, are qualitatively trained through specialization courses organized internally and assisted by the suppliers of used products; this goes beyond the usual training related to safety and environment, such as the ones concerning the use of equipment and machinery.

Individual competence is subjected to continuous improvement, also thanks to the accumulated experience, being recorded on their own Personal Form.

The individual competence is monitored by the organization that, based on the needs, determines and assesses the performances that influence the qualitative, environmental and safety aspects, as well as assessing the effectiveness of the training; where necessary, the organization takes action to fill any gaps.

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7.3 AWARENESS

The most direct and effective means used to detect the awareness of each operator is the audit, for which each interviewed responds according to knowledge of their work and on know-how. In addition to this, the FULLA TRADING COMPANY oversees and monitors the effectiveness of work in the workplace, organizes meetings with managers and continuously offers specific training where necessary. The disclosure of nonconformities found also contributes to improve the level of awareness. In this way, all personnel are aware of the importance of their activity to achieve the set objectives in guaranteeing the effectiveness of the Integrated Management System and the consequent performance. Information and communications to workers make them aware of the company policy in favor of Quality, Environment, Health and Safety, making them participate and competent in being able to offer their contribution in managing these aspects at every level and facing any implications by addressing the risks in the most purposeful and proactive way

7.4 COMMUNICATION

7.4.1 OVERVIEW

FULLA TRADING COMPANY ensures that the mechanisms to facilitate communication are present and provides in a communication plan developed according to the needs and the sectors concerned: the logistics are managed through documentation required for traceability, both during loading / unloading of materials / products during processing as well as during handling. The activity is subject to the documentation posted in a special bulletin board, which indicates the operations carried out and to be carried out step by step. In the case of foreign personnel, the FULLA TRADING COMPANY provides the support of mother tongue translators. The “Communication” factor is totally covered and where the documentary support is missing, the verbal one intervenes, when NC is detected, then a recorded is taken. The Communication is disseminated to everyone with the aim of making clear the intentions towards achieving the objectives for Quality, Environment and Safety. Outside the Communication is managed by e-mail, only in the case of significant changes for the interested parties.

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7.4.2 INTERNAL COMMUNICATION

The organization communicates internally all the relevant information for Quality, Environment and Safety at each level and to all functions belonging to the organization, including changes to the Management System; it also ensures that the communication processes make it possible to carry out the activities contributing to continuous improvement.

7.4.3 EXTERNAL COMMUNICATION

The organization communicates externally and to all the interested parties all that concerns the productive activities, the maintenance of the legislative obligations, the methods to manage each processing, trainings and continuous improvements; making themselves available to satisfy every request in order to satisfy every minimum requirement, not only for Customers but also for the competent authorities, institutions and associations involved in the FULLA TRADING COMPANY's activity.

7.5 DOCUMENTED INFORMATION

7.5.1 OVERVIEW

The necessary documentation to meet the requirements for Quality, Environment and Safety refers to:

- Training and Education (dedicated folders)
- Archiving Completed Orders (Dedicated folders)
- Equipment (dedicated folders)
- Internal Audit (Data Saving Binder)
- Raw Materials' Certificates (Archived on paper forms and electronically)
- Corporate Mood (Data Saving Binder)
- Competence (Personal Card folder)
- Delivery of work clothing (dedicated folder)
- Safety and fire control (folder with Firefighters' procedure)
- Control of made changes ("Activity Monitoring" + Management Review)
- Flow chart (attached in this document)
- Duvri (electronic storage)
- DVR (Dedicated envelope + electronic copy)

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- Suppliers (Supplier Cards Folder)
- Plants (dedicated folder)
- Switches (Data Rescue Binder)
- Burner maintenance (dedicated folders)
- Forms (archived electronic)
- Monitoring and measurement (Technical Data Sheets & Instrument Certificates Folder)
- Nonconformity (Dedicated folder and electronic registration)
- Objectives (“Activity Monitoring” + Management Review)
- Issued Offers (dedicated Binders)
- Organization and interested parties (atch. in this document + notice board)
- Company policy (atch. in this document)
- Internal operating procedures (electronic archive)
- Products purchased (Purchases Folders)
- Production and processes, carried out activities(Sales Folders)
- Customer properties and any NC (DDT + Photos + NC + Communications via email)
- Quality Control and Working Plan (on the notice board)
- Customer Questionnaire (Data Saving Binder)
- Goods Front Desk Registration (dedicated folder)
- Bid requests (electronic orders, on paper forms in a special folder)
- Management Review (Minutes of the end of calendar year)
- Traceability (Documents / Provisional Plates + Quality Control and Working Plan)
- Product Safety Data Sheets (Cards stored on paper form and electronic format)
- Product Technical Sheets (Cards stored in electronic format)
- Scheduling of job program (by email to the customer)
- Reported Incidents and Missed Incidents (dedicated folder)
- Health Surveillance (dedicated folder)
- Tools (Data Rescue Binder)
- Test Certificate 3.1 (Document for the Customer and archived in electronic format)
- Test Record for Production (Document for Customer and archived in electronic format)
- Inspection checks (Data Saving Binder)

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7.5.2 CREATION AND UPDATE

All documentation, both on paper form and electronic format is created and managed in order to be in compliance with the regulatory requirements and for Customer needs satisfaction. All documentation is prepared, updated and proven by the QM. An Internal Operating Procedure defines the management of paper and electronic documentation.

7.5.3 CONTROL OF DOCUMENTED INFORMATION

The term Document must be understood as any paper or electronic means used to record or document in a controlled manner the activities of the FULLA TRADING COMPANY organization, carried out in compliance with the regulations. The documents required are constituted by this manual, by the procedures, by the instructions and by the various forms, defining the activities necessary for:

- Ensure that documents are verified and approved, as appropriate, before being issued
- Ensure that, when necessary, the documents are reviewed, updated and approved
- Ensure that the changes and the current revision status of the documents are identified
- Ensure that the relevant versions of the applicable documents are available where in use
- Ensure that documents are and remain legible and easily identifiable
- Ensure that documents of external origin are identified and their distribution is controlled
- Prevent the inadvertent use of obsolete documents and adopt their own identification in case these have to be preserved for any purpose

Documents on computer support are also controlled. The functional documents relating to the communications between the various functions are referred to and described in the various IOP.

The documentation of external origin is appropriately archived in the related Orders, managed and divided by Customer, in electronic format.

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8. OPERATING ASSETS

8.1 OPERATIONAL PLANNING AND CONTROL

8.1.1 OVERVIEW

Planning and control are managed through the documentation available to everyone on the bulletin board where everyone can find information to address each work phase under the aspect of Quality and obtain the know-how related to the behavior according to Safety and Environment; all in compliance with the provisions of the “Activity Monitoring” which actively monitors the progress of each business process, constantly in line with the norms, in particular:

- Definition of the required objectives and standards
- Assignment of responsibility for monitoring and control
- Identification of the requirements
- Implementation of procedures and work instructions- Recording of the results of the activities carried out

8.1.2 HAZARDS REMOVAL AND RISKS REDUCTION FOR OSH

FULLA TRADING COMPANY establishes implements and keeps operative the Work Instructions, thanks to these it reduces, moving forward to the complete elimination, the risks and dangers that are generated during the activities carried out; in order to do so:

- adopt the least dangerous possible processes, activities, materials and equipment
- reorganize the work using technical and design measures suitable for the purpose
- periodically train the Personnel
- use suitable PPE
- evaluate the reports of the Managers

8.1.3 CHANGE MANAGEMENT

In collaboration with the PSM, temporary or permanent changes with any type of impact in terms of OSH are monitored and recorded, contemplating:

- new materials

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- new work processes
- different organization and production logistics
- different location and employment status
- new or different plants and production lines
- new or different workforce
- new technology
- various regulatory and training provisions

8.1.4 SUPPLYING

8.1.4.1 OVERVIEW

Products and materials are incoming and outgoing checked, as per Internal Operating Procedure, in order to have constant evidence of whatever is stored in the warehouses and storage methods implemented.

8.1.4.2 OUTSOURCING

The same type of control and monitoring is applied to any activity that is outsourced, considering outsourcing as an integrated part of all FULLA TRADING COMPANY activities; each Procedure and each Instruction has the same value as the FULLA TRADING COMPANY area, for which it is imperative to meet the same requirements as the organization.

8.2 REQUIREMENTS FOR PRODUCTS AND SERVICES

8.2.1 COMMUNICATION WITH CUSTOMER

Communication relationships with Customers are based in the first instance on the disclosure of information about the company through advertising channels such as the website and the trade fairs attended by FULLA TRADING COMPANY; brochures, exhibitions, , and business cards surround the advertising media used to promote the brand. As soon as the customer is acquired the communication factor turns into a close relationship by email and telephone through which the management of each order covers each phase, from the first contact with the request to the last offer with the issuance of certificates in 3.1 that end the order (see “Activity Monitoring”).

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8.2.2 REQUIREMENTS ESTABLISHMENT RELATED TO PRODUCTS AND SERVICES

FULLA TRADING COMPANY works on order therefore it differs from what is the classic standardization of the product; the experience accumulated at each level offers guarantees on the programming required for each individual case that appears as novel. This leads to a sure advantage in fulfilling the requests and in satisfying the requirements, even the most difficult ones, which often customers with difficulties see fulfilled in other, even more important and consolidated, realities in the market.

The same Management is in charge of supervising the market to better identify which position occupies FULLA TRADING COMPANY within it; there is no lack of feedback from the same customers thanks to which, in addition to the regular periodic questionnaires on their satisfaction, it is possible to receive and analyze personalized Score Cards. In the name of the certifications boasted by the company, almost all customers require proof of complete management and FULLA TRADING COMPANY is constantly able to offer any type of documentation required.

8.2.3 REVIEW OF PRODUCTS AND SERVICES REQUIREMENTS

In addition to the end-of-year review, that includes any non-conformities deriving from the relationship with customers, the FULLA TRADING COMPANY organization preserves in paper form and electronic format both the requests for bids and the bids issued, with possible requests for deviations, from both the parties. The correspondence on product requirements can be found in the order confirmation that is also duly filed in electronic format. The end-of-year review covers the relationships and communications between customers, including: meetings with the customer, responses to complaints, announcements concerning the production phases, surveys to measure customer satisfaction, evidence of the certifications.

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8.2.4 CHANGES FOR PRODUCTS AND SERVICES REQUIREMENTS

The variations are in most cases the prerogative of the Customers that can be found in the change requests present in the revisions of the request for offer. The management is exemplified in the “Activity Monitoring”.

8.3 DESIGN AND DEVELOPMENT OF PRODUCTS AND SERVICES

In terms of the services provided by the company, this item of the ISO9001: 2015 standard has been excluded. This exclusion does not absolve the company from its ability or responsibility to provide services that meet the requirements of society.

8.4 CONTROL OF PROCESSES, PRODUCTS AND SERVICES EXTERNALLY SUPPLIED

8.4.1 OVERVIEW

The organization monitors how and to what extent the external or internal supplies meet the business requirements and consequently those of the Customer, in terms of quality as well as those related to Safety and the environment. Each incoming product is checked and identified, in order to guarantee its proper use and the processing is effective in achieving the required standards. The Quality Control is constantly carried out Phase by Phase for each process, while for the aspects related to the Environment and the OSH, the Organization verifies at least once a year that the supplier fulfills the regulatory obligations by periodically carrying out internal audits.

8.4.2 CONTROL KIND AND EXTENSION

What is received, whether it is a useful product for processing or a material being processed or a service is immediately checked, as far as possible, or stored as “Withdrawal subject to inspection” or checked afterwards in the case of a service. Any entry of material is handled in first instance by the Front Desk that produces the documentation necessary for the Unloading of goods. The carrier to unload the

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goods with the related documentation communicates the acceptance, the result of the operation and the status of the goods. All documentation is archived in paper format; if necessary, in front of inconsistencies or nonconformities, the Management takes care of communicate what has been found, interacting electronically and by telephone with the Supplier or the Customer in search of the most immediate and effective solution.

8.4.3 INFORMATION TO EXTERNAL SUPPLIERS

The relationship with the Suppliers at the time of issuing an order is managed by the Management, together with the Quality Manager and the Purchase Office. The definition of each order is done electronically and stored in the internal server; it is filed in paper form in the face of the transport document and the invoice, and divided by category: consumer products, raw materials.

8.5 SERVICES DELIVERY

8.5.1 OVERVIEW

services in general are chosen on the basis of the maximum and total satisfaction of the requirements of FULLA TRADING COMPANY that any time carries out checks of any character on the work. Posting the “Quality Control and Working Plan” on the notice board defines each work phase to be carried out on completion of each individual Job Order, on the basis of the Customer’s Specification. In support of the same document it outlines all the quality controls to be carried out for each single phase. All the operators involved, employed to carry out the tasks, are instructed and can read up on their work in real time, as well on one still to be performed as the results obtained on the one carried out.

8.5.2 IDENTIFICATION AND TRACEABILITY

All the tolling material from the Customers is first intercepted by the front desk at the office in charge; who delivers the material to the goods unloading presents itself to the goods receptionists with the necessary documentation for identification, documentation that is affixed to the goods themselves.

Every single piece arrives in FULLA TRADING COMPANY already marked and identified by the Customer, according to its procedures and methods, or accompanied by instructions to mark it and identify it; this marking follows the piece in each processing step, except during the sandblasting process for which it is temporarily removed and applied

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immediately at the end of the same processing, according to what is described by FIFO (First In First Out) mode.

Traceability is guaranteed by the identification possible at any time, up to the final storage, where the markings are also repeated on the packaging if this prevents their visibility on the finished piece.

8.5.3 PROPERTIES THAT BELONG TO CUSTOMERS OR EXTERNAL SUPPLIERS

The incoming goods, being Customer's property, as well as being identified, are above all controlled in order to detect any nonconformity with respect of what is contractually established by the Order, both in terms of quantity and quality.

In the event of discrepancies, the Customer is immediately contacted informing him of the problems encountered, supporting communication with photos as proof of the findings (all by telematic means and if necessary also by telephone).

It is mandatory for FULLA TRADING COMPANY the respect for the consequent will of the Customer who orders the treatment of the goods found in defect; every order and wish of the Customer is expressed in written form by electronic means.

8.5.4 PRESERVATION

Each piece to be processed, worked and processed is subjected, according to Quality Control and Working Plan, to control and treatment before and after each working phase.

The peculiarity of FULLA TRADING COMPANY's activities requires by nature that each processing is carried out with successive and immediate temporal phases, marked and determined by the temperatures and reactions of the applied products. The heat generators (ovens) are therefore monitored to ensure their production efficiency, as even the products themselves are carefully stocked and in the manner recommended by the manufacturer to guarantee the final result after application. The working dynamics in a timely manner prevent contamination on average that in any case would be detected and removed at each working interval, when each piece is subjected to a predetermined control. The packing and the final storage of the worked piece is carried out according to the nature of the piece itself and of the applied coating that, if necessary, allows or foresees a type of packaging rather than

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others; in fact it is the Customer's responsibility to personally take care of the packaging phase if this requires particular and specific actions and / or materials.

8.5.5 POST DELIVERY ACTIVITIES

On an annual basis, customers are given a questionnaire by which FULLA TRADING COMPANY can verify, in addition to the level of satisfaction, also the possible critical points on which to go to strive for a significant and appreciable improvement.

In addition to total support in the eventuality of a complaint, for which FULLA TRADING COMPANY will promptly assume its responsibilities (obviously after verification), the Customer can count on a service of assistance and advice, based on experience, in the treatment of processed and returned products, both in storage and handling and last but not least, where possible, in use.

8.5.6 CHANGES CONTROL

Any change is evaluated, proposed and discussed with the Customer who is the only one who can decide on that. As far as possible the changes are defined and discussed upstream at the beginning of the activities, in the Offer phase, due to FULLA TRADING COMPANY experience that can assist the Customer in making the best results, often exceeding the minimum required standard. Against an unforeseen problem during the activity the practice does not differ from the previous modalities; in fact, it is always the Client who, once alerted and informed of the situation, has the right and the power to decide the actions to be taken, also evaluating those suggested by FULLA TRADING COMPANY, taking advantage of the support provided and the risk analyzes made on time.

8.6 SERVICES RELEASE

All products, parts, processes, services and activities carried out for the Customer and released by FULLA TRADING COMPANY's production are subject to certification in 3.1 that determines their physical, mechanical and qualitative characteristics and indicate their use and appropriate treatment.

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8.7 CONTROL OF NON-COMPLIANT OUTPUTS

Interposed between the work of FULLA TRADING COMPANY and the expectation of the customer is the so-called “Third Party” activity, entrusted to inspectors who are part of institutions officially recognized nationally, internationally, worldwide (depending on the needs of the customer), these intervene and attend every production phase, monitoring and supervising on behalf of the Client and ensuring compliance with the Specifications and requirements; these figures are sometimes accompanied by direct Inspectors of the Client, with the same purpose. The inspectors themselves report on what they have seen and found on site and interface with the customer in real time to ensure the correctness and acceptability of each process, up to the delivery of the finished, packaged and stored product. FULLA TRADING COMPANY, in fact, carries out the Client’s instructions, subjecting itself also to the interventions of the Third Party which in the meantime intervenes in the verifications, indicating to the Customer where to intervene and to FULLA TRADING COMPANY how to intervene, following the Specifications of the case. It is always the Third Party that draws up the Minutes and Reports on which it reports the methods and types of checks carried out on the work, the interventions or the modifications, also indicating any nonconformities found.

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9. PERFORMANCE EVALUATION ANALYSIS AND EVALUATION

9.1 MONITORING, MEASUREMENT,

9.1.1 OVERVIEW

FULLA TRADING COMPANY provides periodic and / or spot checks on everything related to its business, but above all with greater attention to the productive activity, any type of monitoring and analysis is available at any time or situation, starting from customer satisfaction to that of its employees, passing through the evaluation of suppliers, evaluating the effects concerning the organization, production and supply of services, both on the territory and on the environment, as well as on the market where is placed.

In order to meet the requirements related to Quality, Environment and Safety and with the help of the “Activity Monitoring”, the organization aims to:

- monitor and evaluate every kind of need
- identify opportunities
- monitor and evaluate progress towards achieving the objectives
- assess the effectiveness of the controls
- monitor and evaluate performance
- determine timing and assessment methods with the relevant figures

9.1.2 CONFORMITY ASSESSMENT

Through the IOP, the WI and the Inspections Visits, the organization assesses compliance with the legal and regulatory requirements, taking corrective actions where necessary, disseminating knowledge on its compliance status, keeping the documented information of the results and planning the checks.

9.1.3 CUSTOMER SATISFACTION

This parameter is of fundamental importance and FULLA TRADING COMPANY monitors it thanks to 4 different channels:

- Paper questionnaire (annual)
- Telephone interview (informal and occasional)
- Cross-evaluation between undersigned orders and requests of received bid (from file)
- Interview during trade fairs (informal)

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9.1.4 ANALYSIS AND EVALUATION

The end-of-year management review includes the evaluation of the actions to be taken against a negative response by one or more customers over the period just ended and subjected to analysis, as well as the effectiveness of the actions taken and brought completed in the previous session (year).

9.2 INTERNAL AUDIT

9.2.1 OVERVIEW

At scheduled intervals, the FULLA TRADING COMPANY conducts internal audits aimed to maintain high attention to the requirements, and quality, training and regulatory compliance, verifying that everything is always implemented and maintained at satisfactory levels.

9.2.2 INTERNAL AUDIT PROGRAM

Internal audits affect every FULLA TRADING COMPANY department, whether productive, administrative, logistic or management; each interview specifies different figures belonging to the same department, in order to highlight probable differences in learning and evaluation on the same conditions or the same environment lived and received individually in the working period.

The questions of each audit are studied and planned in agreement between the Head Management, the Quality Manager and the Head of the Prevention and Protection Service, entrusting the material execution (interview) to the staff in charge.

9.3 MANAGEMENT REVIEW

On an annual basis, the Management analyzes all the data that can be detected and found from all reports received over the 12 months, deriving from: inspections, questionnaires, nonconformities, communications from Customers and Suppliers, internal Audits, external Audits.

The in-depth study of the critical points leads to the evaluation of possible problems by studying the best feasible solution, the training needs, the business needs related to the infrastructures and the equipment, any management changes.

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The evaluations are reported in the document of the Management Review which, in addition of highlighting the various steps, also offers possible solutions by giving a deadline of implementation date or applicability.

10. IMPROVEMENT

10.1 OVERVIEW

The parameter of improvement is strongly linked to the experience accumulated over time by each individual member of FULLA TRADING COMPANY; intended not only at the production level, even at the organizational and management level. This involves paying attention to the present and necessary resources, to the opportunities offered by the market and to those for improving the management system, therefore to the improvement actions to be undertaken.

10.2 NONCONFORMITIES AND CORRECTIVE ACTIONS

All nonconformities have the precedence, in terms of solving them and find their remedy, over any activity; any intervention subsequent to the nonconformity found is undertaken promptly in order not to leave room for the occurrence of consequent events, especially given the nature of the sequential phases. The same Non-Conformance Report requires indicating in a dedicated section the actions to be taken to solve it and the corrective action to be implemented.

The non-compliance report is recorded and archived, pending the submission to the revaluation for the end-of-year Management Review.

The prompt reaction is essential by taking the necessary corrective actions, addressing the consequences; the workers and managers at every level are involved in examining the unexpected or the incident that requires an in-depth analysis and evaluation to prevent the recurrence of the event, as well as the immediate and safe solution of the event, determining the causes.

The corrective actions taken can also lead to significant changes to the company management system and are monitored in order to verify their effectiveness towards qualitative, environmental and health improvement, in order to avoid their recurrence; as implemented and adopted, as well as the results, have to be available to all interested parties, verbalizing and recording any nonconformities.

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10.3 CONTINUOUS IMPROVEMENT

Inspections, periodic checks, check list reports, non-compliance and training reports, audits, all documentation produced to support the highlighting of points and aspects to be improved are included in the drafting of the Improvement Program (inside the “Activity Monitoring”) that, in addition to describe what interventions are to be implemented to improve all aspects related to the FULLA TRADING COMPANY complex and its activities, outlines the timing of implementation / activation of the interventions themselves, giving rise to deadlines to be respected or at least by take as a reference.

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