

Group Directive – Food and Product Safety

1 Introduction and Purpose

This Group Directive (“Directive”) is related to and aligned with, the Group Policy Operations, Quality and Procurement. The Directive presents mandatory principles and describes how the supervisory Group Policy Operations, Quality and Procurement is applied in detail.

This Directive is supplemented by underlying processes which sets out more detailed routines and principles concerning food safety and product safety.

The purpose of the Billerud’s Food and Product Safety Directive is to establish procedures to ensure that our products are safe for intended use and to establish procedures that prevents or minimizes risks for physical, chemical and microbiological contamination. Most of the paper and board products in Billerud’s product portfolio are used for food packaging or medical applications.

2 Scope and Applicability

This Group Directive applies to Billerud and its subsidiaries (“Billerud” or “the Group”) and covers Billerud’s global business activities and operations. The Directive applies to all persons working at or for Billerud, including board members, employees, trainees and consultants.

The Directive Owner is responsible for the communication and implementation of this Directive. All Billerud Representatives are however individually responsible for reading, understanding and following this Directive.

Procedures shall be in place where it is deemed relevant for managing risks and unacceptable consequences of risks. Routines may vary depending on type of business within Billerud.

3 Billerud Food and Product Safety

Food and Product safety within Billerud includes relevant areas to ensure delivery of safe products to consumers. The guiding principles are relevant for all paper and board products, but requirements can differ between market segments and production units.

3.1 Principles

The following principles must be followed in order for Billerud to deliver safe products:

1. We comply with applicable food and product safety legislation.
2. We have relevant procedures in place for risk assessment.
3. We strive to continuously improve.
4. We have well and continuously trained personnel that consider food and product safety as a natural part of their daily work.
5. We communicate food and product safety with customers to ensure mutual exchange of information.

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3.2 Responsibilities

The organization shall determine and provide the resources needed for the establishment, implementation, maintenance, update and continual improvement of the Food Safety Management System.

Personnel carrying out activities having impact on food and product safety shall have appropriate education, training, skills and experience, and are responsible to communicate relevant information and knowledge in the value chain to the customer. Structured processes shall be in place to report and follow up deviations and improvement possibilities.

Each production unit is responsible for food and product safety fulfilment and for establishing and maintaining relevant procedures for risk assessment of their processes, products and activities.

Commercial business areas shall secure food and product safety for the full value chain, i.e. sourcing, converting, storage and transport to customers. This includes, but is not limited to, outsourced processes, selling material and buying back converted products, as well as selling chemicals under Billerud's brand.

The business areas are responsible for marketing products only for intended uses according to relevant approvals and certificates.

3.3 Compliance obligations

Billerud has established a product safety base level, centred on food contact and/or medical packaging applications, which our products shall fulfil, with very few exceptions for products used in certain non-food contact applications.

3.4 Risk assessment

Risk assessments shall be reviewed according to relevant requirements and form the basis for prioritization and implementation of preventative actions in the continuous improvement work.

3.5 Food safety management system

All Billerud's production units (mills) are certified according to the food safety management system FSSC 22000 where applicable.

The food safety certification covers raw material sourcing, production, handling, storage and distribution of our products and include hygiene rules, cleaning, maintenance, pest control and internal audits. In addition to our own operations, control of our suppliers and sub-contractors is also included.

3.6 Strategy and goal settings

The process for setting food and product safety goals can be illustrated as in the picture below and is aligned to the directive for the groups common goal process.

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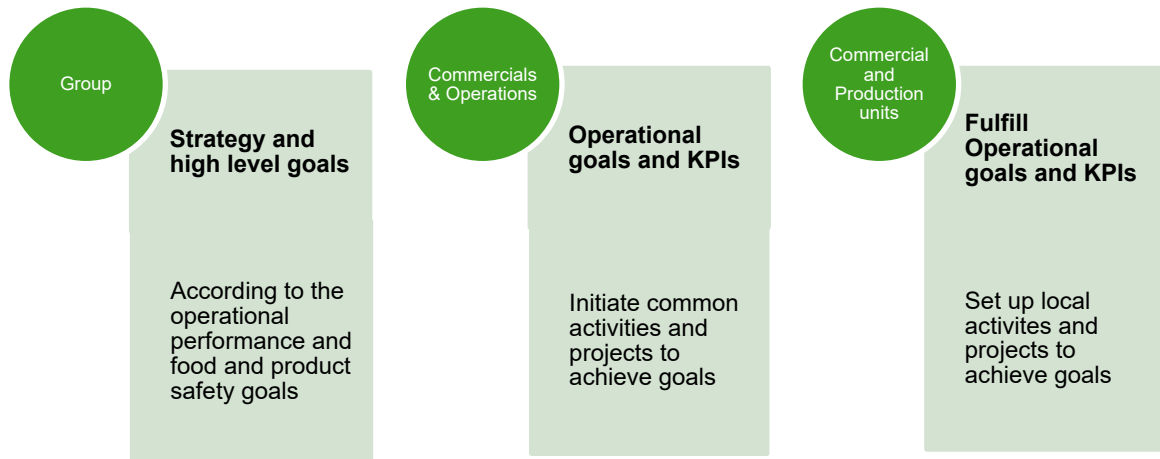
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4 Reviews, Controls & Audits

Billerud shall perform adequate reviews, controls, and audits to monitor compliance with this directive. The Directive owner shall, at least once a year, monitor and assess the implementation of the Directive through self-assessments or equivalent procedure.

Each production unit shall plan and implement the processes needed to validate control measures, and to verify and improve food and product safety.

The management team at each production unit shall review the food safety management system at planned intervals to ensure its continuing suitability, adequacy and effectiveness. The review shall include assessing opportunities for improvement and the need for changes in the management system. Records of management reviews shall be maintained.

The production units' food safety management systems are subject to yearly external audits by a third party.

5 Accountability, monitoring and compliance

This Group Directive has been approved by the Policy Owner or assigned. The Directive Owner is responsible for the implementation of this Group Directive, including:

- (i) to develop more detailed rules (if needed) for the subject matter, consistent with the purpose and intent of this Group Directive,
- (ii) to ensure that the Group Directive and underlying supporting documents are communicated and known to Representatives,
- (iii) to monitor and follow-up compliance with the Group Directive and underlying steering documents; and
- (iv) to take other actions, including corrective and reporting measures necessary to achieve the purpose and intent of this Group Directive.

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Billerud's Representatives are expected to report violations (including suspected violations) of this Group Directive to the immediate manager or Directive Owner. Anonymous reporting of wrongdoings (whistleblowing) can be made through Billerud's Confidential Reporting System (Speak-Up Line). If you would have questions or feedback on this Group Directive, please contact the Directive Owner or Legal & Compliance."

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