

WINPAK

FSMS MANUAL

Compiled by:	Barrie Barnardt	Authorized by	ANTHONY PEARSE	Document No.	MASTER MANUAL 000
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FOOD SAFETY & FOOD SAFETY MANUAL

SANS (ISO) 22000:2018

ISO22000:2005 STANDARD FOR PACKAGING AND PACKAGING MATERIALS

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DEFINITION OF TERMS

For the purpose of the Company Food Safety Management System, the definitions given in ISO 22000:2018 apply.

FSMS

The Food Safety Management System used within the Company, supplemented by hygiene requirements, in order to produce safe and legal products. It has been designed to meet the requirements of ISO 22000 and the BRC/IOP Standard.

ISO 22000

The standard fully known as SANS ISO 22000:2018

FOOD SAFETY DETERMINING

Food Safety determining purchases are products or services used by the Company that form part of, or come in direct contact with, finished goods. Consumable items are not included.

DEPARTMENT MANAGER

The term Department Manager refers to any or all of the following:

- Sales Director
- Production Manager
- Operations Manager

AUTHORISED BUYER

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An employee holding one of the following job titles granted permission by a Company Director to purchase Food Safety

Determining goods or services:

- Managing Director
- Production Manager
- Operations Manager
- Food Safety Control Manager
- Production Controller
- Maintenance Supervisor

FOOD SAFETY CONTROL MANAGER

An employee who is responsible for the day-to-day running of the FSMS and compliance with the FS Standard. This position is currently assigned to the Operations Manager. He is also the Management Representative for the ISO 22000 FSMS

FSMS MANAGER

An employee who is responsible for the control of the FS Standard. This position is currently assigned to the Production Manager. His deputy is the Food Safety Control Manager.

OPM

The Company's Operating Procedure Manual.

FOOD SAFETY COMMITTEE

A committee, chaired by the Production Manager, and consisting of the Operations Manager and every Supervisor provides a forum for consultation between management and employees on all aspects of health, hygiene and food safety.

SCOPE

Primary Scope

- Implementation of all applicable national and international legal regulations (food legislation, health, working safety, labour law, environment etc.)
- Food Safety Management
- Product Safety

SCOPE:

1.1. Food Safety System Manual: This manual describes WINPAK's FS Management System. It includes WINPAK's Food Safety System policy and describes how it is implemented and sustained throughout the organization. The systems core elements are described with references to the key organizational procedures. In this International Standard, the term "product" applies to the product or service intended for, or required by, a customer or the product/service realization processes.

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1.2. Purpose: The purpose of WINPAK's Food Safety Management System is:

- a) to ensure product and service Food Safety continue to meet the highest standards demanded by the organization and expected by its customers.
- b) aims to enhance customer satisfaction through the effective application of the system, including processes for continual improvement of the system and the assurance of conformity to our customer.
- c) WINPAK conforms to the regulatory controlling body for the printing industry, namely PIFSA.

1.3. Scope:

WINPAK's Food Safety Manual specifies the requirements of its Food Safety management system in accordance with ISO9001-2008 to:


- a) Demonstrate its ability to consistently provide products that meets customer requirements, and
- b) Aims to enhance customer satisfaction through effective application of its system, including processes for continual improvement of its system and the assurance of conformity to customer requirements.

"The Company specialises in the manufacture & supply of plain and printed self-adhesive (PSM) Labels printed on a diverse range of substrates"

FOOD SAFETY POLICY & MISSION STATEMENT

It is the Policy and Mission of WINPAK to:

- Maximise customer satisfaction through timely delivery of commercially acceptable product that meets customer requirements at a competitive price.
- Continually improve the effectiveness of the Food Safety Management System.
- Produce safe and legal products that comply with applicable legal requirements.

Signed:  Date: 19 July 2021
Anthony Pearse
Managing Director

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FOOD SAFETY MANAGEMENT SYSTEM

GENERAL REQUIREMENTS

The Company has established, documented, implemented and maintains a FSMS designed to conform to ISO22000. The Company has determined that the Low Hygiene Risk Category of the Food Safety standard is applicable to the Company as it manufactures packaging that does not come into direct contact with high-risk food products. Specifically, the Company has identified the processes needed for the FSMS and their application throughout the Company. Appendix A shows the sequence and interaction of these processes together with the Section numbers within the OPM that are applicable to ensure that both the operation and control of these processes are effective, and that they can be monitored, measured (where applicable) and analysed.

The Company's management is committed to maintaining a hazard and risk management system. This system consists of a multi-disciplinary team backed by external expertise when considered necessary. They are led by a person suitably trained in hazard analysis and risk management techniques. They are responsible for reviewing and identifying critical control points within our system and assessing the following areas: microbiological, foreign objects and chemical (e.g. taint, odour, allergen, component transfer) contamination, legality and defects critical to consumer safety of products manufactured by the Company.

The Company has established, implemented and maintains procedures and work instructions covering all aspects of the Standards, together with personnel responsible for each procedure and their training required. The Company declares that it is not knowingly directly or indirectly involved in the following activities:

- Illegal logging or trade in illegal wood or forest products.
- Violation of traditional and human rights in forestry operations.
- Destruction of high conservation values in forestry operations.
- Significant conversion of forests to plantations or non-forest use.
- Introduction of genetically modified organisms in forestry operations.

DOCUMENTATION REQUIREMENTS

The documentation exists as three main levels:

- This Food Safety Manual.
- Operating or Management Procedures that span the full range of Food Safety related activities. Together these comprise the Operating Procedures Manual (OPM).
- The Systems Manual, such as Machine Set-Up Instructions, Maintenance Instructions, Colour Matching Instructions, Packaging Specifications and Test Methods Manual.

The Food Safety Manual is issued in two forms:

- As a document located on the Company's web site www.winpak.co.za for both existing and potential customers to view.
- As an internal PDF/Word file for the use of the Company's employees.

All documents determined by the Company as necessary for the planning and operation of the FSMS are identified and controlled. These documents are reviewed and approved

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before issue. Procedures exist to ensure that only the latest approved issues are in use, and that pertinent issues of necessary procedures are available where required. In addition, procedures exist for the control of obsolete documents. All these procedures cover printed, typed or computerised documents or data.

All records are legible and in a clear and unambiguous form. They are securely stored, but are readily accessible as and when required. Full details, including the different types of record and their minimum retention times, are contained in documented procedures. Records are kept to demonstrate that:

- Specified requirements have been met for each customer order and delivery, and if there is a non-conformance, the corrective actions taken.
- Company products are traceable both to raw material batches and other Food Safety records, and to the processing conditions under which they were made.
- The FSMS has been operated as planned.

MANAGEMENT RESPONSIBILITY

MANAGEMENT COMMITMENT

The Managing Director is committed to the development and implementation of the FSMS and to continually improve its effectiveness. This is illustrated by the establishment of the Food Safety Policy, regular communication to employees of the importance of meeting customer requirements, legal requirements and the establishment of Food Safety objectives. The Managing Director also chairs management reviews and ensures that appropriate resources are available.

CUSTOMER FOCUS

The Managing Director is instrumental in ensuring that procedures are in place to ensure that customer's requirements are both determined and met with the aim of enhancing customer satisfaction.

FOOD SAFETY POLICY

The Managing Director has defined and authorized the documentation of the Food Safety Policy & Mission Statement for the Company. This Food Safety Manual and other documented procedures and instructions describe how this policy is put into effect. This includes the keeping of records to demonstrate that we have achieved the required policy, that our Food Safety system has been operated as laid down, and that it has been subjected to the required internal audits and review.

In addition, our FSMS provides a framework to establish and review the Company's Food Safety objectives. Adherence to this policy requires a company-wide approach as it covers almost every aspect of our business. This policy must be understood and acted upon by everyone concerned, and it is made known to all members of the company through:

- Permanent display on all main notice boards.
- Company training programmes, including induction training.

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- Internal Food Safety audits, the summarised results of which are subject to management review.

PLANNING

The Managing Director has ensured that Food Safety objectives, including those that are needed to meet requirements for product, are established at relevant functions and levels within the Company. These objectives are measurable and consistent with the Food Safety Policy.

At Management Review meetings all the requisite Food Safety planning is performed to improve the effectiveness of the FSMS and to ensure that any changes made do not affect the integrity of the system.

RESPONSIBILITY, AUTHORITY AND COMMUNICATION

The Managing Director is ultimately responsible for the Food Safety of all products and services supplied by the Company. In consultation with senior management he authorises changes to the Food Safety Policy, objectives and the FSMS. All of the Company's employees are involved in the FSMS and can assist the Company in meeting its Food Safety objectives. Specific areas of responsibility are covered within the OPM. Line of authority and interrelation of all personnel are shown on the Organisation Chart.

The Management Representative has full responsibility and authority from the Managing Director to ensure that the requirements of the FSMS are established, implemented and maintained. The Management Representative reports on the performance of the system and any need for improvement, as part of the Management Review. It is the responsibility of the Management Representative to promote the awareness of customer requirements throughout the Company. The Management Representative is also responsible for liaison with any external party on matters relating to the FSMS. The FS Team Leader has specific responsibility for the implementation and monitoring of the FSMS. The Managing Director communicates the effectiveness of the FSMS via senior management and the Management Representative.

SPECIFIC ROLES & RESPONSIBILITIES

- Overall responsibility for Food Safety/product safety and legal compliance
- Provision of sufficient resources for maintaining and constantly improving the management system
- Regular evaluation of the effectiveness of the system by internal audits and the management review
- Definition and follow-up of Food Safety targets
- Nomination of one member as the management representative acting as primary contact for Food Safety/product safety and legal compliance
- Setting of Food Safety goals for the sites

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Food Safety Management:

- The General Manager assigns selected duties of establishing, monitoring, updating and improving the Food Safety Management System. Specific responsibilities include:
 1. Constant improvement of FS management system and adaptation to market/legal requirements
 2. Maintenance of FSMS level documents or elements of management system
 3. Implementation and maintenance of processes for systematic detection, analysis and improvement of internal and external defects
 4. Organization of external and internal audit programme
 5. Generation and documentation of FS Management Review
 6. Food Safety reporting/follow-up of Food Safety targets

Site Management:

- Responsibility for Food Safety/product safety and legal compliance of the site
- Implementation of the requirements of the FS Manual
- Provision of sufficient resources for Food Safety/product safety
- Generation and continuous improvement of the site-specific elements of the management system
- Achievement of site specific Food Safety goals
- Approval of the site management review as input for the FS Management Review

Site Food Safety Manager:

- The General Manager assigns selected duties to the elected Food Safety manager, including:
 1. Maintenance of local elements of Food Safety/product safety management system according to implemented standards
 2. Performance of internal audits
 3. Food Safety control
 4. Calibration of test equipment
 5. Handling of internal and external defects
 6. Evaluation of the supplier performance in cooperation with local Purchasing
 7. Generation of management review for the site
 8. Initiation and monitoring of preventive and corrective actions

MANAGEMENT REVIEW

The FSMS is reviewed at least annually by means of a minuted review meeting chaired by the General Managing. The review assesses the FSMS for its continuing suitability, adequacy and effectiveness in satisfying all the requirements of the standards that make up the FSMS together the Company's Food Safety Policy and objectives. Opportunities for improvement to the FSMS and the need for any changes are also considered. All senior managers attend the meeting, plus co-opted members as required. In case of special needs, the General Managing may call an extraordinary meeting. The agenda will vary according to

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circumstances, and is detailed within the OPM. The Management Representative is secretary to, and prepares minutes of, the meeting.

RESOURCE MANAGEMENT

PROVISION OF RESOURCES

The Company has determined and provided resources needed to implement and maintain the FSMS and continually improve its effectiveness and to enhance customer satisfaction by meeting customer requirements. The Company seeks to ensure manufacturing equipment is well maintained and operated to agreed procedures and instructions, by trained and conscientious employees, in a suitable environment. Emphasis is placed on ensuring that all resources, whether they are buildings, plant, fixtures or equipment, are procured and maintained to ensure a high level of hygiene, and subsequently minimisation of risk, within the Company. All new installations of equipment will be properly specified prior to purchase and be of suitable design so that it can effectively be cleaned and maintained. It will also be tested and commissioned prior to use in a production environments and a maintenance programme established. Security and access control ensure only appropriate personnel are admitted to sensitive areas of the premises and that contamination risks are minimised. Transport, storage and distribution of raw materials and finished product is undertaken in order to minimise the risk of contamination or malicious intervention.

HUMAN RESOURCES

The Company seeks to develop and maintain a high level of Food Safety and hygiene consciousness within the organisation and to ensure all personnel have the appropriate training and skills for their individual roles within the Food Safety system.

Personnel performing work affecting conformity to product requirements are competent on the basis of appropriate education and training together with relevant skill and experience. Each Department Manager, together with the Management Representative, is responsible periodically for identifying training needs in his/her department, and providing for the training of all personnel, who manage, perform or verify work-affecting Food Safety. They are also responsible for ensuring that personnel with the appropriate level of training and skills only carry out specific activities, which affect Food Safety and that those personnel are aware of the relevance and importance of how they contribute to the company's Food Safety objectives. Details of training experience are held in either computer files or hard copy. This programme of identification and training is also reviewed and evaluated, in summary, at the Management Review. In addition, the Management Representative has responsibility and authority to ensure that trained personnel, who are independent of direct responsibility for the work being performed, carry out internal Food Safety audits.

A high level of personal hygiene is expected in order to minimise the risk of product contamination and health conditions likely to adversely affect product safety are monitored and controlled. Suitable protective clothing is worn where deemed appropriate.

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All managers within the company shall ensure that any absenteeism is dealt with and that any key staff are covered by suitable replacements.

INFRASTRUCTURE

The Company has determined those resources that are needed to achieve conformity to product requirements, including buildings, workspace and associated utilities, equipment used in product manufacture and supporting services.

Computer systems are held in a secure environment, adequately controlled and regularly backed up. Back-ups are also maintained off-site for further protection.

WORK ENVIRONMENT

The Company has taken into account the work environment needed to ensure conformity to product requirements.

Procedures are in place to ensure adequate space, layout and process flow in order to prevent any cross-contamination and that the staff facilities are sufficient for the number of personnel. In addition housekeeping, cleaning and waste disposal procedures ensure that the environment is suitable for the production of product that is suitable for direct food contact. A pest control procedure is in place and regularly maintained. Utilities used in the production and storage areas are maintained.

PRODUCT REALIZATION

PLANNING OF PRODUCT REALIZATION

The Company has planned and developed the processes needed for product realization, which are consistent with the requirements of other processes of the FSMS. Consideration is given to:

- Any existing documented procedures that form an integral part of the Food Safety system.
- The identification and acquisition of any controls, processes, equipment (including monitoring and measuring equipment), fixtures, resources and skills that may be needed to achieve the required Food Safety.
- Ensuring the compatibility of the production process, installation, servicing, inspection and test procedures and the applicable documentation.
- The updating, as necessary, of Food Safety control and testing techniques, including the development of new instrumentation.
- The identification of any measurement requirement involving capability that exceeds the known state of the art, in sufficient time for the needed capability to be developed.
- The identification of suitable verification at appropriate stages in the realisation of product, the clarification of standards acceptability or all features and requirements, including those that contain a subjective element.
- The identification and preparation of Food Safety records.

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CUSTOMER - RELATED PROCESSES

The Company seeks to ensure that all customers' requirements are fully understood with regard to all incoming orders, specifications and artwork. The sequence of events, from receipt of an order, through to its acceptance and processing is defined in the OPM. Within these procedures, steps are taken to ensure that:

- The Company determines requirements related to the product for each order received from a customer.
- All requirements are reviewed and defined prior to the Company's commitment to supply product and that these are agreed with the Customer.
- Any new specified requirements differing from those originally on offer are resolved.
- The company has the correct raw materials, trained operators, suitable production and appropriate systems and procedures for the order to be completed. If the required capability to produce the order is not immediately available, action must be taken to acquire it, to re-negotiate or decline the order.
- That legal requirements applicable to the product can be met.
- All orders are acknowledged.
- Records of every review are kept.
- Customer complaints are recorded, together with other feedback.

DESIGN AND DEVELOPMENT

All design and development work performed is at the express request of customers. The sequence of events, from receipt of an enquiry, through to the approval of design work is defined in the OPM. Within these procedures, steps are taken to ensure that:

- The Company determines requirements related to the design and development of product for each order received from a customer.
- Customer supplied artwork is reviewed and any minor amendments required to produce a practical solution are agreed. Unless special arrangements are made proofs are agreed by the customer before any work starts.
- Any new specified requirements differing from those originally on offer are resolved.
- Appropriate records are kept.

PURCHASING

It is Company policy to ensure that only approved suppliers are used to provide Food Safety Determining raw materials and services. All purchased products, out-work and services should conform to specified requirements. To implement this policy, the Company operates an Approved Suppliers List, backed by evidence of Food Safety assurance approval, to ensure that purchase orders are only placed with those suppliers capable of meeting our specified requirements. The Approved Suppliers List is maintained on a computer system and periodically updated from records of supplier performance and supplier complaint procedures. The amount and nature of receiving inspection required for a particular material or service is based on evidence of control exercised at source, proven performance

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and documented evidence of Food Safety conformance. When a product or service is obtained from a new supplier or a supplier who for other reasons is not on the Approved Suppliers List, sufficient precautions are taken to verify that specified requirements have been met.

Depending on the product or service ordered, purchase documents contain sufficient and relevant data clearly to describe the specified requirements for that particular item. Purchase documents are reviewed and approved for this before their release. When it is necessary to place an order verbally or by telephone, this is immediately confirmed in writing. The purchase document will then confirm that this is written confirmation of a previous verbal order, and provide adequate reference to this. The purchase document is subject to the same controls for content, review and approval as an original written order. Systems exist that prevent the purchase of non-Food Safety certified product to be used in products supplied with an appropriate claim.

All materials and out-work are inspected on receipt to the degree necessary to verify that they conform to specified requirements. That degree is determined by the Food Safety Control Manager and Authorised Buyer and depends on the nature of the material, its intended use and whether the supplier appears on the Approved Suppliers List. If, in case of special need, tests are required that cannot be carried out in-house, arrangements for outside testing are made.

Materials and outwork are only released for urgent production before being cleared under a Positive Recall Procedure.

This ensures that the material is clearly marked and that it can be recalled if it is later found to be defective. If the Company, or one of its customers, intends to perform verification at a supplier's premises, we will state the intended verification arrangements and method of product release on a Purchase Order.

PRODUCTION AND SERVICE PROVISION

All operations related to the production planning and manufacturing of product are carried out under controlled conditions.

Various documents lay down procedures for planning and manufacturing product through the plant, for monitoring of products and processes, for compliance with specifications and standards, for criteria of workmanship and for the degree of inspection and testing required. These include:

- Detailed instructions for the choice of raw materials (including FSC certified product if applicable), and for the manufacture, inspection, testing and packaging of every job.
- General procedures for plant operations are as per SOP's
- More detailed technical and work instructions such as Machine Set-Up and Running Instructions, Colour Matching Instructions, Packaging Specifications and Maintenance Instructions. These documents are held separately from the OPM. Further instructions for maintenance and operator instructions are held in machine manuals for each machine.

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Where results of processes cannot be fully verified by subsequent monitoring or measurement of the product, qualified operators will carry out processes, to ensure contract requirements are met.

Procedures exist to ensure that products are identified and traceable through all stages of production from receipt of incoming materials or outwork, to delivery of finished labels. Planning and other procedures also ensure that individual jobs have a unique identification. This is traceable back to retained customer orders and artwork, and to individual raw material batches and related test and other data, including printing plates and die formes. Systems are provided to establish and identify the inspection and test status of product from raw materials through to their finished state. This includes procedures for identification and release of conforming items and who has the responsibility and authority for this.

Special arrangements are made for all materials supplied by customers and intended for use in manufacture or incorporation in product supplied to them. This ensures that:

- Their materials are verified or inspected against requirements on receipt.
- Only used in the product(s) for which they were intended.
- The customer is informed of any materials which fail receiving inspection or which are scrapped, damaged or lost at more than reasonable wastage rates.
- All surplus stocks are disposed of as intended.

If supplied product is found not to meet specified requirements at the goods inwards or any later stage, we are still required to produce labels to the original specified requirements unless a customer concession has first been obtained.

The handling, storage, packaging, preservation and delivery of all products and materials are controlled to agreed procedures to prevent damage, deterioration or loss. As the Company's product is also used in the food and pharmaceutical industries, special hygiene regulations are enforced and monitored. Details are contained within documented procedures.

All practicable steps are taken to identify, avoid, eliminate or minimise the risk of foreign body, chemical or biological hazard contamination.

Samples of products are kept for a minimum of one year, together with their associated production records. This period can be varied on request by customers.

PRODUCT REALIZATION

CONTROL OF MONITORING AND MEASURING EQUIPMENT

The Company has determined what monitoring and measuring is needed, and what equipment is required to provide evidence of product conformity to determined requirements. Documented procedures exist to ensure monitoring and measuring equipment is suitable for its intended purposes and are calibrated or verified, or both, to agreed procedures and schedules.

This equipment are regularly checked and calibrated or verified to ensure their continuing effectiveness. Individual records are kept of calibration requirements and procedures. All equipment is selected for their suitability and precision in measuring the particular property

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under test. Adequate steps are taken to ensure that the handling, preservation and storage of all items are such that the accuracy and fitness for use is maintained, and that these items are safeguarded from adjustments which would invalidate the calibration setting. Master equipment is certified and traceable to National Standards.

MEASUREMENT, ANALYSIS AND IMPROVEMENTS

GENERAL

The Company has planned and implemented monitoring, measurement, analysis and improvement processes to demonstrate conformity to product requirements, conformity to the FSMS and to continually improve the effectiveness of the FSMS.

It is the intention of the Company to optimise Food Safety and production costs by emphasising prevention of defects rather than inspection of products. Nevertheless, we inspect and check raw materials and services, in-process work, and finished goods, against pre-determined standards and specifications

The layout and documents of the management system reflect the process orientation of the business activities of WINPAK. Process steps, inputs/outputs, responsibilities, interfaces, records etc. must be defined and documented within the Management System in an appropriate manner. The performance of the processes is measured by key performance indicators.

Continuous improvement is an important pillar of the company philosophy and therefore a key task of all employees. In order to reassure a comprehensive approach towards comprehensive improvement various tools are applied e.g. measurement of customer satisfaction, Management Review, internal and external audits etc.

MEASUREMENT OF CUSTOMER SATISFACTION

The measurement of customer satisfaction is performed individually by the sites and/or on group level by the sales department. As appropriate for the respective customer and product focus, inputs such as supplier evaluations, visit reports, review meetings, customer satisfaction surveys shall be utilized. Moreover, the customer satisfaction is also measured indirectly by selected internal indicators like e.g. delivery performance, complaint rate etc.

INTERNAL AUDITS

Internal audits are performed by trained internal auditors and are coordinated by the FS Team Leader. The Food Safety Manager is responsible for the orderly and timely execution of the Internal Audit Plan.

EXTERNAL AUDITS (Customer and Third Party)

The Food Safety Manager must arrange the orderly performance of the external certification audit by an accredited institution. The organization of third party and customer audits lies within the responsibility of the Company.

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SUPPLIER AUDITS

There is a common system for supplier audits that is accessible within the company. The supplier audit plan and the audit reports are available on an electronic database once a specific audit date has been confirmed by the party/s concerned.

MONITORING AND MEASUREMENT

As far as is possible within acceptable practices, the Company monitors information relating to customer perception as to whether the Company has met their requirements in order to measure the performance of the FSMS.

Periodic internal audits are performed to ensure that the FSMS conforms to planned arrangements, i.e. the ISO 22000 Standard and the Company's documented procedures. These audits are carried out to a fixed schedule, which is prepared by the Management Representative and confirmed at the Management Review. The Management Representative appoints internal auditors who are independent of direct responsibility for the work under audit. Training is carried out where necessary. A summary of audit test results is evaluated at the Management Review.

The Company monitors and measures FSMS processes. When planned results are not achieved, correction and corrective actions are taken, as appropriate to ensure conformity of the product.

In order to ensure that product requirements are met, the Company inspects and tests the product during the various stages of its travel throughout production. Records are kept which show that such inspection and testing has been performed and who has authorised the release of product. Unless specifically requested by a customer no work is released without authorisation. To the greatest possible extent principles of operator inspection and control are followed, but supplemented by routine inspections. Details are contained within OPM. Where necessary instructions drawn up by the Food Safety/Facility Manager denote the sampling frequency and plan, and any special tests required. In-process work is only released for the next production stage when:

- It has received positive clearance under all inspection and testing required so far, or
- The stack has been marked for defective material but procedures provide for more detailed inspection and sorting at a later production stage, or
- It is released under a Positive Recall Procedure. Documented procedures state that the Production Manager has the authority for this. At all stages, non-conforming product is identified.

Final inspection includes verification that all earlier inspections and tests required by the Food Safety plan have been completed and cleared, and that the label batch conforms to specified requirements. This includes confirmation that the necessary records have been kept.

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MEASUREMENT OF CUSTOMER SATISFACTION

The measurement of customer satisfaction is performed by the sales department. As appropriate for the respective customer and product focus, inputs such as supplier evaluations, visit reports, review meetings, customer satisfaction surveys shall be utilized. Moreover, the customer satisfaction is also measured indirectly by selected internal indicators like e.g. delivery performance, complaint rate etc.

CONTROL OF NONCONFORMING PRODUCT

Product which does not conform to specified requirements at any stage of production, is identified as such and segregated and controlled to prevent inadvertent further processing or despatch. Procedures are enforced so that nonconforming product is re-worked to meet specified requirements, or accepted, with or without repair, by customer concession, or rejected and scrapped. Any items reworked are re-inspected according to laid down procedures.

Procedures state who has responsibility and authority for this, and how records are kept.

ANALYSIS OF DATA

The Company collects and analyses data in order to measure the effectiveness and suitability of its FSMS. This data is used to help consider if continual improvement of the effectiveness of the FSMS can be made. Data from all sources may be used to provide specific information as to customer satisfaction, conformity to product requirements, characteristics and trends of processes and products including opportunities for preventive action and suppliers.

IMPROVEMENT

The Company strives to improve the effectiveness of the FSMS by reviewing the Food Safety policy, Food Safety objectives, audit results, analysis of data, corrective and preventive actions and management review. The Company has established, documented and maintains procedures for implementing corrective and preventative actions. These actions are appropriate to the magnitude of the problems and commensurate with the risks encountered. Procedures for corrective actions ensure that there are effective handling of both customer complaints and reports of product non-conformities; that the causes are investigated and corrective actions determined to eliminate these; that these are effectively taken and reviewed. Procedures for preventive actions ensure that these are properly determined and planned, and that an appropriate person is given responsibility for carrying them out. These are minuted and reviewed at subsequent meetings until complete. Management review includes checks for any applicable updates to legislation, scientific or technical developments and industry codes of practice.

PREVENTIVE & CORRECTIVE ACTIONS

Preventive and corrective actions are an integral part of the handling of internal defects or external complaints and are documented in the respective files. In addition, more

WINPAK

FSMS MANUAL

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systematic methods for the generation of improvement measures like statistical defect analysis, root cause analysis, evaluation of testing data, FMEA etc. shall be applied by the production facility wherever feasible.

The ultimate evaluation of the effectiveness of the preventive and corrective actions is realized by the quarterly follow-up of the Food Safety key performance indicators.

HYGIENE MANAGEMENT SYSTEM / GMP / SOP

WINPAK has implemented and certified a hygiene management system and GMP according to the selected standards of the SANS10049:2012 FSMS to assure Food Safety and product safety.

The sites are responsible for fulfilling the requirements of the selected standards like:

- HACCP risk analyses
- Pest Control
- Hygiene rules
- Cleaning procedures
- Waste management
- Maintenance
- Hygiene inspections
- Validation, etc.