

Product Safety Policy for Porcelain Products of LUBIANA S.A.

Porcelain Tableware Factory

1. Entry

This Product Safety Policy outlines principles designed to ensure a high level of safety and quality for porcelain products offered by our company. It covers all stages of the product lifecycle – from design and production, through distribution, to end-consumer use.

Our actions in this area are based on applicable legal provisions, in particular Regulation (EU) 2023/988 of the European Parliament and of the Council of 10 May 2023 on general product safety, which establishes a framework for placing on the market only products safe for consumers.

2. Objective

The aim of this policy is to ensure that all our products comply with applicable laws, technical standards and user health and safety requirements. Our operations are consistent with European Union regulations, particularly regarding food contact, thermal and chemical resistance and product durability.

The implementation of this policy aims to protect the health and interests of consumers , build a brand trust and ensure full compliance with regulations and market expectations.

3. Definition of Product Safety

Product safety of porcelain products means ensuring that porcelain products intended for contact with food do not pose a threat to the health and life of users when used properly. This includes chemical, physical and mechanical safety, as well as, compliance with applicable standards and regulations.

In the context of ceramic items, product safety concerns in particular:

- content of harmful substances – no migration of lead, cadmium and other hazardous substances into food;
- safety of use – edge chipping and the possibility of using in devices such as microwaves or dishwashers (if the product is intended for this purpose);
- compliance with standards and regulations – meeting the requirements specified in national and EU regulations (e.g. Regulation (EC) No. 1935/2004 on materials and articles intended to come into contact with food, standard EN 1388-1 on migration of heavy metals).

4. Legal and normative requirements

All porcelain products must comply with applicable national and international standards.

The manufacturer guarantees:

- compliance with EU regulations (1935/2004, 2023/2006) and national regulations;
- chemical safety (migration of heavy metals);
- physical and mechanical safety (e.g. resistance to cracks);

- appropriate markings on the packaging (glass and fork symbol, instructions for use);
- good manufacturing practice and batch documentation.

5. Product design and development

The product design process takes into account ergonomic, usability and health safety aspects.

6. Raw material and production control

Raw materials, pigments, and glazes are selected with safety in mind. Suppliers are audited and the production process is monitored at every stage. Production documentation is archived.

Scope of raw material control

We purchase raw materials only from approved suppliers who hold appropriate certificates of quality and compliance with legal requirements regarding food contact materials. Our company has a Supplier Selection Policy.

Quality specifications for raw materials, such as technical, chemical and physical parameters, including:

- mineral composition and granulation of kaolin, feldspar, quartz;
- no toxic substances, pollutants and other harmful ingredients.

The receipt of raw materials is subject to quality control, which includes:

- verification of delivery documentation (certificates of analysis, safety data sheets);
- laboratory tests of selected batches of raw materials in terms of chemical and physical parameters;
- visual and sensory control (e.g. moisture, color, consistency).

Recording inspection results and keeping records of raw material batches, which allows for full traceability and possible corrective actions.

The importance of raw material control

Raw material control is the foundation of product safety for porcelain products because:

- ensures consistent physical and mechanical quality of porcelain;
- minimizes the risk of manufacturing defects that could pose a threat to the user (cracks, chips).

Production process control

The production process of porcelain products is carried out in a controlled manner and in accordance with the adopted quality standards and safety requirements, so that the final product is safe for the user and meets all requirements.

Control of production stages

The production of porcelain products is monitored at all key stages, in particular:

- preparation of ceramic masses – control of the proportions of raw materials, homogeneity and physicochemical properties of the mixtures;
- forming the product – controlling the dimensions, shape and stability of raw elements;
- drying – control of the drying process to prevent cracks and deformations;
- firing – monitoring firing temperatures and times to ensure adequate strength and stability of the material;
- glazing and decorating – control of the thickness and quality of the applied coatings.

Product quality control during production

- Regular laboratory testing of samples at every stage of the process (e.g. mechanical strength tests, heavy metal migration tests from glaze coatings).
- Visual inspections – checking product surfaces for cracks, chips, irregularities and decoration defects.
- Dimension and weight control – compliance with technical documentation and product specifications.
- Checking compliance with hygiene requirements – absence of contamination and harmful substances.

Documentation and registration

- All inspection and test results are documented and archived .
- Traceability of production batches is maintained, what allows for a quick response in the event of non-compliance being detected.
- The system for reporting non-conformities and implementing corrective actions is an integral part of the production process.

Staff training and qualifications

- Staff involved in the production process are regularly trained in safety, quality and operation of machinery and equipment.
- Maintaining high standards of operator competence minimizes the risk of production errors.

Monitoring and continuous improvement

- Systematic analysis of production control data serves identifying potential problems and areas for improvement.
- Improvement measures are being implemented to increase the safety and quality of porcelain products.

By comprehensively monitoring and documenting each stage of production, we guarantee that the final product is safe, compliant with standards and satisfactory for the user.

7. Labeling and information for users

As part of our quality assurance policy and compliance with applicable national and EU law, ZPS Lubiana S.A. applies clear, reliable and comprehensive labeling to porcelain products intended for contact with food. The goal is to ensure safe use and transparent information.

We ensure that the markings and information are:

- legible and durable - prints, labels and symbols are made in a durable and abrasion-resistant way;
- available on individual packaging or attached as an information leaflet;
- understandable to the end user – we use universal graphic symbols and simple wording.

8. Market monitoring and incident management

The market monitoring and incident management system is a crucial pillar of the product safety policy. ZPS Lubiana S.A. treats every market report as a significant source of information, enabling:

- consumer protection;
- rapid risk mitigation;
- improving design, production and communication processes.

Registers, reporting and channels for reporting concerns and needs

Creating an internal report or receiving a report from the market (e.g. from a customer or distributor).

Risk assessment; whether the incident poses a health risk to the consumer or non-compliance with legal requirements (e.g. migration of heavy metals, damage leading to injuries).

We provide consumers and end users with various channels to express their concerns and needs directly and receive a quick response.

The main ones are:

- dedicated e - mail address: reklamacja@lubiana.pl ;
- contact forms and information on the website: www.lubiana.pl ;
- Customer Service Office (BKO), which provides ongoing support.

We ensure that all channels are accessible, transparent and user-friendly. Our company does not rely solely on information provided by business partners regarding the functioning of reporting channels. We have established our own, independent reporting mechanisms and provide access to them to all potentially affected parties, including:

- consumers and end users;
- individuals and organizations acting on their behalf;
- employees and entities in the value chain.

We also provide access to external reporting mechanisms.

Report monitoring and tracking system

Our company has a detailed system for monitoring and tracking reported cases, described in the " Regulations for Receiving Reports and Taking Follow-up Actions ", operated by the Misiewicz, Mosek and Partners Law Firm, 12/2 Stągiewna Street, 80–750 Gdańsk, described in detail in the ESG Report (Chapter IV – Reporting irregularities . Consumer and end-user trust.)

Corrective and preventive actions

- Conducting a causal investigation – identifying the source of the problem (e.g. raw material defect, manufacturing error, improper use).
- Implementation of preventive measures, such as changing the supplier, modifying the instructions for use, additional checks during the production process.

9. Summary

We are committed to continuous monitoring and improvement of our product safety processes, as well as, transparent communication with our trading partners, customers and regulatory authorities regarding potential threats and corrective actions.