

## QUALITY POLICY

(Quality Manual - ANNEX Nr.3)

As a part of GWC Group, GWC MANUFACTURING (SHANGHAI) Co. Ltd is highly specialized in designing and manufacturing of valves technically and functionally engineered for critical applications in the Oil & Gas industry assuring the compliance with:

- contractual requirements stated by the Client (commercial, technical, operative and/or qualitative);
- project specifications provided by the Client;
- technical, qualitative and operative product requirements, even if not determined by the Client;
- other applicable normative and regulations (also related to Health, Safety and Environmental management).

Inside the Company Area located in Qingpu District (Shanghai, China), well-localized in the metal-mechanics manufacturing industrial district, is situated also the local *Head-Quarter Office*, as the Strategical-Directional Office and the Center of Excellence for technical-qualitative competences and manufacturing know-how inside the GWC Group (GWC Group *Head-Quarter Office* located in GWC ITALIA S.p.A., next to Milan in Italy).

The synergic management permitted by well-experienced technical and managerial competences, innovative production equipment investments, main stakeholders' interest identification (i.e. qualified and well-experienced suppliers/outsourcers network) and well-established Quality Management System (certified according ISO 9001:2015 and APIQ1:2014) is strictly linked with GWC MANUFACTURING (SHANGHAI) Co. Ltd. high-level of production specialization inside the local manufacturing plant.

This fact assures the compliance of products manufactured by GWC MANUFACTURING (SHANGHAI) Co. Ltd. in respect of the main international product specifications, technical normative and industrial regulations:

- API Product Licenses (ref. API Spec. 6A [Valves - PSL 3] and API Spec.6D [Ball Valves]);
- Directive 2014/68/EU (PED EU Directive);
- Directive 2014/34/EU (ATEX EU Directive);
- Directive IEC 61508:2010 (SIL Definition - Safety Integrity Level);
- Product certifications for EURASEC custom union (TR-CU 010:2011 / TR-CU 032:2013).

Furthermore, due to the flexible organizational structure and to the operational synergy (developed also with the partnership of qualified and well-experienced suppliers/outsourcers network GWC MANUFACTURING (SHANGHAI) Co. Ltd. manages its core business:

- systematically considering the main stakeholder interests, as assessed into the Company context (both external and internal);
- duly evaluating new opportunities and potential risks, as evaluated into the Company context (both external and internal);
- systematically aiming to satisfy Clients needs and expectations;
- slavishly applying "Continuous Improvement" management philosophy;
- assuring safe work environment and minimizing business environmental impact (according with the main international standards, respectively ISO 45001 and ISO 14001).

The Company Top Management assures an effective and efficient management of the established Quality Management System performing yearly the planning process of organizational goals and objectives for the organizational processes (and for the overall Quality Management System), monitoring constantly the respective on-going progress and updating coherently the requested targets according with Company business strategy.

Through the strategic planning process GWC MANUFACTURING (SHANGHAI) Co. Ltd. Top Management assigns and manages coherently the needed resources (from quantitative and qualitative point of view) in order to plan, implement, monitor, reinforce and develop its own core business activities (both managerial and operative) to achieve the defined organizational goals and objectives.

The overall performances of the Company organizational processes are periodically monitored, evaluated and reported by the Company responsible personnel through the analysis of data and information, as summarized through Key Performances Indicators (KPI) which are determined and periodically updated by the Top Management.

The organizational responsibilities through the Company processes are detailed and described inside GWC MANUFACTURING (SHANGHAI) Co. Ltd. Quality Manual and respective attachments.

Top Management encourages and supports Company personnel involvement and pro-active commitment (through all the organizational levels) to assure coherent management of the established Quality System and to create a shared motivation to achieve the defined organizational goals and objectives, as necessary to maximize the overall Client satisfaction and expectations.

The operative management of the Company Quality System is delegated to the Quality Manager who reports directly to the Top Management.

This document (as a property of GWC MANUFACTURING (SHANGHAI)) is made available to the Company personnel inside the Company intranet and through the exposure in the dedicated areas inside the Company manufacturing plant.

The document is also available to main Company stakeholders thanks to the publication on the GWC Group internet website (the same document in controlled hard copy can be provided if expressly requested).

Qingpu District (Shanghai), 4th May 2020

  
**General Manager**  
**GWC MANUFACTURING (SHANGHAI) Co. Ltd.**

GIOVANNI LUIGI CAMBONI