ZIGNAGO VETRO

ANTI-CORRUPTION POLICY

Approved by the Board of Directors
of Zignago Vetro S.p.A. on July 24, 2025

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1. INTRODUCTION

Zignago Vetro S.p.A. (hereinafter also the "Company") is a company under Italian law listed on the Italian stock exchange. Its main activity is the production and marketing of high-quality hollow glass containers prevalently for the Food and Beverage, Cosmetics and Perfumery sectors. It heads a group of companies that also produce high quality glass containers for the Food and Beverage, Cosmetics and Perfumery - including luxury perfume - industries, along with Speciality Glass bottles for wines and spirits, for the domestic and international markets. The Group is also engaged in other sectors offering synergies with its core business - particularly the collection and treatment of glass cullet for subsequent reuse and the construction of moulds for container production.

The Zignago Vetro Group promotes integrity, honesty, fairness and legality and actively contributes to preventing and combatting, taking a zero-tolerance approach, any form of corruption, ensuring compliance with anti-corruption laws in the countries in which it operates.

In this context, and in line with the provisions of the Code of Ethics, Zignago Vetro has brought together in this Anti-Corruption Policy (the "Policy") the set of rules of conduct to prevent the risk of the commission of corrupt acts, reinforcing those values and principles that have always been a feature of the Group's activities, relations with employees, collaborators, customers, suppliers, shareholders, partners and the Public Authorities, i.e. all those with whom it deals with in the performance of its business activities.

The Zignago Vetro Group is aware that the adoption of an Anti-Corruption Policy, which clearly and transparently sets out the set of rules and values by which it pursues the achievement of its business objectives, is of central importance to ensure maximum transparency and fairness in the conduct of its business activities, to protect its image and reputation, the expectations of its shareholders and the work of its employees and of all stakeholders in general.

In order to further strengthen its commitment, Zignago Vetro has joined the United Nations Global Compact, promoting compliance with the 10 core principles[1] and contributing to the achievement of the Sustainable Development Goals (SDGs) of the United Nations 2030 Agenda.

2. POLICY OBJECTIVES AND SCOPE OF APPLICATION

The purpose of this Policy is to prohibit and prevent any corrupt conduct, taking a "zero-tolerance" approach toward any conduct, direct or indirect, and any practice that may amount to corruption, whether active or passive. The Policy - through outlining the general reference principles and the rules of conduct (prohibitions and obligations) to be observed in the company's operations, as well as the specific corruption risk safeguards - complements the Code of Ethics and the Organisation and Control Model pursuant to Legislative Decree No. 231/2001, where applicable.

It is therefore part of the more general path charted by the Company in the pursuit and promotion of compliance with relevant regulations and the prevention of wrongdoing.

Specifically, through the adoption of this Policy, the Zignago Vetro Group seeks to pursue the following goals:

- to define an approach opposed to any form of corruption, condemning such forms of unlawful conduct as in any case contrary, in addition to the provisions of the law, to the ethical principles with which it seeks to comply in the exercise of its business activities;
- to strengthen the corporate culture of integrity and legality and to protect activities, business processes and relationships with third parties;
- to define the rules that all Addressees (defined in Section 4) must put in place and disseminate in order to prevent corrupt conduct;
- to establish among the Addressees the awareness that they may commit, in the event of violation of this Policy, offences punishable by criminal sanctions that may be imposed against them, as well as incurring administrative sanctions and disciplinary measures that may be imposed directly by the Company and its subsidiaries.

[1] Among which, Principle X *"Businesses should work against corruption in all its forms, including extortion and bribery".*

This Anti-Corruption Policy is adopted by Zignago Vetro S.p.A. and the companies directly or indirectly controlled by it, namely Zignago Vetro France Sas, Zignago Vetro Polska Sa, Italian Glass Moulds S.r.l., Vetro Revet S.r.l. and Zignago Glass Usa Inc. (hereinafter also collectively referred to as the "Group" or the "Zignago Vetro Group" or "Zignago Vetro").

Zignago Vetro also promotes the adoption of and compliance with the standards defined in this Policy by the companies or entities in which the Group is involved (e.g. joint ventures, etc.), or alternatively, the adoption of its own guidelines, which in any case guarantee compliance with these principles.

3. ADDRESSEES

This Policy applies to the members of the corporate bodies, employees, proxies and collaborators in any capacity of Zignago Vetro S.p.A. and the companies directly or indirectly controlled by it, as well as to those who have contractual relations, whether for consideration or free of charge, with Zignago Vetro S.p.A. and its subsidiaries (hereinafter also "Addressees").

In particular, the Directors of the companies belonging to the Zignago Vetro Group must be guided by the principles and rules of this Policy in setting the objectives of the Company, in proposing investments and executing projects, and in any decisions or actions related to the management of such. Likewise, the Executives and the heads of the corporate functions, in concretely implementing the management activities of Group companies, must be guided by the same principles and rules, both internally, thereby strengthening cohesion and the spirit of mutual co-operation, and with third parties with whom the Group companies undertakes relations.

The employees of the companies of the Zignago Vetro Group perform the functions within their scope of responsibility in accordance with the principles of honesty, fairness, commitment and professional rigour, and act, in the performance of the activities entrusted to them, in accordance with the applicable legal provisions. Every action, transaction, negotiation and, more generally, any activity carried out by Group employees, must comply with the rules of management fairness, transparency, completeness and truthfulness of information, as well as company procedures.

The criteria of co-operation, loyalty and mutual respect must shape relations with employees at any level, and between them and third parties with whom they come into contact by reason of their work activities.

In particular, it is required to:

- diligently observe the provisions of the Anti-Corruption Policy, refraining from any conduct contrary to such;
- offer maximum co-operation in investigating possible and/or alleged violations of this Policy;
- inform third parties who come into contact with Group companies of the requirements of this Policy and require compliance.

Where, due to the specifics of the relevant regulatory environment, an overseas company of the Zignago Vetro Group should need to adopt its own code on anti-corruption, such shall in any case comply with the Policy, mandatorily reflecting its content, with any necessary adaptations according to local laws.

4. RELEVANT FUNCTIONS

The Governing Body and Senior Management - respectively The Board of Directors and the Chief Executive Officer, as identified in UNI ISO 37001:2025 - ensure the operation of the system for preventing and combatting corruption. In particular, the Board of Directors plays a role in guiding and evaluating the adequacy of the Internal Control and Risk Management System (ICRMS) in the scope of which the anti-corruption system is included, and the Chief Executive Officer is responsible for maintaining its effectiveness over time.

5. REGULATORY FRAMEWORK

The Zignago Vetro Group is a multinational group that carries out its activities in several nations and jurisdictions and is therefore subject to compliance with Italian laws and the laws in force in the countries in which it operates, including those

ratifying international conventions that prohibit corruption towards the Public Sector and corruption among private individuals.

In recent years, the fight against corruption has become progressively more important nationally and internationally, partly in light of the tightening of sanctions associated with the natural person and the legal person (i.e. fines, disqualifications and imprisonment), as well as in view of the reputational impacts.

Governments, both at national level and through international agreements, have promoted a regulatory framework focused on deterring corrupt practices.

The main references to national and international anti-corruption regulations and conventions (and all of their subsequent amendments and supplements) applicable in the main countries in which the Group operates are cited by way of example only:

- The Penal Code;
- The Civil Code
- Law No. 190/2012 on the prevention of and fight against corruption and illegality in the Public Sector;
- Legislative Decree No. 231/2001 and subsequent amendments and supplements;
- the United Nations Convention against Corruption;
- the Foreign Corrupt Practices Act (FCPA) enacted in the United States;
- the UK Bribery Act issued in the United Kingdom;
- International conventions ratified in the Italian legal system: OECD "*Convention on Combating Bribery of Foreign Public Officials in International Business Transactions*" (Paris, 1997); "*Criminal Law Convention on Corruption*" (Council of Europe, Strasbourg, 1999); "*United Nations Convention Against Corruption*" (Merida, 2003);
- European Union Directive No. 1937/2019 on Whistleblowing;
- ISO 37001:2025 international standard on anti-corruption management systems;
- *An Anti-Corruption Ethics and Compliance Programme for Business: A Practical Guide* (drawn up in September 2013 by "*United Nations Office on Drugs and Crime*" - UNODC)
- the Organisation for Economic Co-operation and Development Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, adopted by the OECD.

This Policy is integrated into the overall risk management and control system to which the Zignago Vetro Group is subject, which includes the following components:

- the Code of Ethics;
- the Organisation, Management and Control Model pursuant to Legislative Decree No. 231/2001 ("231 Model") for the company Zignago Vetro S.p.A. and its subsidiary Vetro Revet S.r.l.;
- Whistleblowing Procedure – Managing reports;
- analysis and assessment of the risks of the commission of corrupt offences;
- principles, rules of conduct and procedures to oversee areas sensitive to the commission of corrupt offences;
- information and training activities for the Addressees;
- the periodic monitoring activities of corruption risks and the effectiveness and adequacy of the Anti-Corruption Policy.

6. GENERAL PRINCIPLES

In line with the Group's Code of Ethics, Zignago Vetro is committed to preventing and fighting against corrupt practices.

More specifically, it is explicitly prohibited to offer to or receive from anyone (either directly, or through third parties) any gifts or any form of illegal payment, whether in cash or otherwise, that may even be simply interpreted as excessive with regard to normal business practices or courtesies, or which could be interpreted as having the intention of acquiring favourable treatment in the execution of any activity associated with the Group companies.

In order to comply with this Policy, consistent with the values of loyalty, fairness, transparency, honesty and integrity, by which the Company's activities are guided, the following general principles must be observed in the main risk areas and instrumental areas to ensure an adequate Internal Control and Risk Management System to prevent corrupt conduct:

- **clarity and simplicity**: the tasks and responsibilities of all those involved in the company's processes, as well as the activities and related controls, must be clearly defined and must include easy-to-apply mechanisms;
- **impartiality and absence of conflicts of interest**: the Addressees of the Policy must act professionally, impartially and in compliance with the anti-corruption regulation. They are therefore obliged to avoid any and all situations from which a conflict of interest may arise, such as to affect - even potentially - their ability to act in the interest of the company and in compliance with the afore-mentioned Regulation;
- **segregation of responsibilities**: tasks, operational activities and control functions must be adequately segregated, so that the person responsible for the operational activity is always a different person from the person who controls and authorises it;
- **delegation and authority system**: roles and responsibilities within the corporate organisational structure must be accurately defined and properly maintained;
- **traceability and archiving**: all activities - and the relative controls carried out - must be traced and verifiable ex post, where possible, also through the use of suitable documentary and IT support; the documentation produced must be archived in an appropriate manner;

7. Principles and Rules of Conduct in Major Risk Areas and Instrumental Areas

The possibility of ethically improper conduct by employees, suppliers or customers, with particular reference to corruption, represents one of the risks most central to the attention of the Zignago Vetro Group's control processes. Specific areas (below) have been identified in which the risk of corruption is highest.

7.1 Supplier relations

The Zignago Vetro Group manages its relations with suppliers and consultants in the utmost respect of the regulatory framework, the Code of Ethics and, where applicable, the provisions of the 231 Model, based on the principles of impartiality, cost-effectiveness, competition and the requirements of professionalism and good standing.

The selection of suppliers and outside collaborators for the purchase of goods and services must be based on evaluations that allow reliance on suppliers of proven quality, integrity, reliability and cost-effectiveness. Specifically:

- the selection process must be transparent and, within the limits established by company procedures, involve competitive negotiation among several counterparties;
- choices must be tracked and documents proving compliance with internal procedures and the purpose of the purchase properly filed;
- the entering into or continuation of any relationship must be terminated where there are acts or suspicions of corrupt conduct.

Periodic verification of the reliability of suppliers of goods and services must also be carried out, especially in cases where the Company makes use of the services of organisations of any nature and kind operating in areas of the country with a high risk of organised crime or in countries with a high risk of terrorism or organised crime and/or has relations or carries out financial and business transactions with parties with headquarters/residence in the above-mentioned locations. Verification of the reliability of suppliers - except those already in possession of qualifications or certifications proving the reliability requirement - should be carried out at the supplier qualification stage and periodically throughout the contractual relationship, such as through the use of international databases (UN, OFAC and EU lists);

Transactions for the purchase of goods and services must be carried out by persons authorised by virtue of the spending powers defined by the proxy system and the specific amount limits stipulated therein.

It is not permitted to give or promise money or other forms of benefits to an employee or representative of a counterparty with whom a Group company has an interest in undertaking the supply of goods or services, in order to obtain an undue advantage (such as an unjustified discount). Likewise, any request or acceptance of money or other benefits by an employee or representative of a counterparty in order to obtain an undue advantage in the conclusion of a supply is prohibited.

For each purchase transaction, it is necessary to verify and keep track of each step in the process with appropriate documentation:

- related to the supplier selection process (supporting documentation, level of formalisation and storage methods/timing), to enable reconstruction of responsibilities, reasons for choices made and information used;
- that the goods/services provided by the supplier and/or consultant correspond to those requested and/or agreed upon;
- that the price paid to the supplier/consultant is in line with market prices and/or is in any case justifiable in consideration of the service rendered and the specific expertise required.

It is forbidden to make payments to suppliers/consultants that are not adequately justified in the context of the contractual relationship established with them.

7.2 Management of professional assignments

The Zignago Group allocates and manages professional assignments (consultancy or professional services of any nature - (legal, fiscal, technical, labour law, administrative, organisational, etc. - including those functional to the management of relational and authorisation processes) to third parties, including in the context of relations with the Public Sector, however deemed suitable to represent the Company's interests. The relevant corporate functions must, at the time of qualification, verify and acquire the existence of the necessary requirements, including those of good standing and trustworthiness (e.g. verification of individual self-certifications, ensuring the archiving of the documentation collected and subsequent evaluation. In the case of multi-year consulting contracts, the permanence of the above requirements on the consultant should be monitored periodically. Provision is made for the monitoring and verification, by the competent function, of the proper performance of the professional service in compliance with the specific contractual provisions, which will be the basis for settling invoices.

7.3 Customer relations

Giving or promising money and other forms of benefits to customers with the intention of making a sale on particularly advantageous terms is not permitted. Likewise, any request or acceptance of money or other benefits for the purpose of applying conditions, not justified by the contractual relationship, for the benefit of customers, as well as facilitating irregularities or fraud, is prohibited.

The application of prices, as well as discounts, promotions and free gifts to customers, must be carried out in compliance with the approval levels and traceability criteria defined by company procedures.

7.4 Relations with Public Authorities

The relations of Group companies with persons representing the Public Sector, Public Officials or persons in charge of a public service must be based on principles of fairness, loyalty, impartiality, collaboration and the utmost transparency, as well as on compliance with the Code of Ethics, the 231 Model, if applicable, and the applicable provisions of law and regulations, and may not in any way compromise the integrity and reputation of the Zignago Vetro Group.

In dealing with the Public Sector, Public Officials or persons in charge of a public service, Group companies must not improperly influence the decisions of officials who deal with or make decisions on their behalf. In particular, the following are prohibited:

- seeking or establishing relationships of favour, influence or interference with the aim of directly or indirectly influencing its activities;
- concealing or destroying correspondence or any other documentation held with representatives of the Public Sector;
- boasting about non-existent relationships with Italian or foreign public officials or public service officers;
- promising or offering to representatives of the Public Sector money, goods and granting economic benefits or utilities of any kind, except within the limits of modest value in the context of courtesy relationships, such as not to violate the integrity and good reputation of the company.

Relations with Public Authorities must be handled only by persons appointed and authorised for the purpose, within the limits of the powers granted to them by formal power of attorney or within the scope of their roles and responsibilities.

The traceability of all dealings with the Public Sector, Public Officials or persons entrusted with public service must be ensured by the preparation of minutes, reports, explanatory notes and the proper filing and preservation of the same. Minutes, reports and explanatory notes should contain information to provide a complete and comprehensive representation of the event, such as:

- the date and place of meeting/contact;
- the object and reason for the meeting;
- the names and roles of all meeting participants;
- the positions expressed on the topic discussed and conclusions.

With regard to any requests of any nature from the Judicial Authority, Zignago Vetro undertakes to provide the utmost co-operation in making statements that are true and representative of the facts, refraining from conduct that could lead to obstruction, in absolute compliance with law and in accordance with the principles of loyalty, fairness and transparency.

7.5 Facilitation payment

The term "facilitation payment" refers to payments made to Public Officials and/or officials of the Public or Regulatory Authorities or to Persons in Charge of a Public Service for the purpose of expediting, facilitating or securing an activity provided for within the scope of proper duties, such as, but not limited to obtaining licenses, certifications, permits, contributions, other official documents or other types of authorisations necessary for operations.

Facilitation payments constitute a form of bribery and are therefore prohibited in any form, regardless of any laws or customs of the countries in which the Zignago Vetro Group operates.

7.6 Management of inspection visits

During inspections at the offices, industrial plants of Zignago Vetro S.p.A. and its Subsidiaries, the conduct of Collaborators must conform to the principles of transparency, fairness, objectivity and traceability.

Relations with public officials in charge of conducting the check are maintained by authorised representatives of the Company with formal delegation. The duties and responsibilities assigned to these individuals include overseeing on behalf of the company the verification process, making available to officials all the required documentation and information. At the end of the process, it must also prepare a final report summarising the results of the checks and showing the documentation requested and provided.

Company personnel, involved in the inspection visit, may not:

- promise or pay sums of money, or other benefits (forms of aid or contributions such as sponsorships, appointments, hiring, consulting, etc., or are, in any case, fraudulently intended to pursue advantages or benefits to which one would not otherwise be entitled) to public officials with the aim of promoting or favouring the interests of Zignago Vetro S.p.A. or its Subsidiaries;
- unlawfully promise or deliver money or other benefits, including non-pecuniary benefits, to a third party on the basis of his or her alleged relationship with an Italian or foreign public agent;
- request or accept the promise or giving of money or other benefit as consideration for unlawful mediation to an Italian or foreign public agent.

7.7 Public funding/grants

Public funding/grants, which by their nature have the effect of granting the recipient a direct or indirect economic benefit through the provision of incentives or concessions that result in tax savings or the acquisition of resources, have a significant risk profile and as such require a cautious approach.

Addressees called upon to manage such public grants/funding must comply with, with the utmost rigour, the principles of transparency, verifiability, and consistency with the Company's business.

In order to reduce the risk of corruption related to public funding/grants, it is necessary to ensure that relations with the funding body or entity are based on the full and loyal co-operation and collaboration necessary for the smooth conduct of business. Zignago Vetro, to this end, has adopted a process aimed at both verifying the existence of the requirements

necessary to access financing/grants, and ensuring the completeness, accuracy and truthfulness of the documentation submitted to the funding body and pertaining to the various stages of applying for and managing the funding.

In addition, a mechanism has been set up to monitor the regular execution of the financed project and the related reporting to be submitted within the deadlines and in the manner prescribed by the funding body, as well as the proper accounting record of the funding/grants disbursed.

Finally, the Zignago Vetro Group respects the principle that grants, subsidies and funding received may not be used for purposes other than those for which they were granted.

7.8 Management of authorisations, permits, licenses and concessions

Relationships with public officials, in the context of requesting and obtaining authorisations, permits and concessions to be issued by entities belonging to the local, national or, if necessary, also foreign Public Sectors, are maintained exclusively by company individuals with specific powers of attorney or, alternatively, by individuals appointed by them with appropriate written authority. If the management of relations with representatives of the Public Sector is entrusted to a third party, the task is assigned by a specific letter or by signing a special contract, with a precise description of how the representation is to be fulfilled and the limits within which it can be exercised.

In the case management process, all information is shared with the internal function that handled it in the preliminary stages.

Persons, however involved in the process of applying for and obtaining authorisations, permits and concessions, may not:

- promise or pay sums of money, or other benefits (forms of aid or contributions such as sponsorships, appointments, hiring, consulting, etc., or are, in any case, fraudulently intended to pursue advantages or benefits to which one would not otherwise be entitled) to public officials with the aim of promoting or favouring the interests of Zignago Vetro S.p.A. or its Subsidiaries;
- boast about non-existent relationships with Italian or foreign public officials or public service officers or unlawfully promise or deliver money or other benefits, including non-pecuniary benefits, to a third party on the basis of his or her alleged relationship with an Italian or foreign public agent;
- request or accept the promise or giving of money or other benefit as consideration for unlawful mediation to an Italian or foreign public agent.

7.9 Management of agreements and conventions with the Public Sector

In the context of entering into agreements and conventions with public sector entities on whose basis the Company undertakes commitments, the relative total cost is provided for in the annual budget. It is also expected that the amounts disbursed to public sector bodies will be checked for consistency with supporting documentation (e.g. invoices) with the convention and budgeted forecasts.

In the management of agreements and conventions with public sector bodies, it is prohibited to:

- promise or pay sums of money, or other benefits to public officials with the aim of promoting or favouring the interests of Zignago Vetro S.p.A. or its Subsidiaries, including as a result of unlawful pressure;
- resort to different simulated forms that have unlawful purposes, especially with regard to anti-corruption;
- boast about non-existent relationships with Italian or foreign public officials or public service officers or unlawfully promise or deliver money or other benefits, including non-pecuniary benefits, to a third party on the basis of his or her alleged relationship with an Italian or foreign public agent;
- request or accept the promise or giving of money or other benefit as consideration for unlawful mediation to an Italian or foreign public agent.

In the case of participation in tender procedures called by Public Entities, aimed at awarding supply contracts, project finance allocation of public incentives, the representatives of the Company must act in compliance with applicable regulations, as well as in compliance with the principles of transparency, fairness, objectivity and traceability. In any case, it is prohibited to:

- offer, promise or pay money or other benefits, directly or indirectly, to Public Entities in general, or to representatives of competing Companies, in order to unduly promote or favour the interests of Zignago Vetro or its subsidiaries;

- maintain relations with representatives of the Public Sector, either directly or indirectly through nominees, aimed at unduly influencing the decision-making process of the contracting party or obtaining confidential information to their own advantage, discouraging the participation of other operators in tenders and, in any case, obtaining any information useful to procure an unfair advantage to the detriment of other parties involved;
- participate in the preparation of the contents of the notice and/or tender documents and/or equivalent documents, in agreement with the contracting party, in order to favour the Company in the awarding of the tender/direct award/competitive procedure;
- recognise fees to external collaborators/consultants that do not find adequate justification in relation to the type of assignment they are to carry out with reference to tender procedures and/or involving a relationship with Public Entities;
- create any form of anti-competitive and/or instrumental understanding designed to distort the outcome of the bids, i.e. to direct threats, gifts or promises toward a possible participant, inducing him or her not to take part in the procedure, or to withdraw a bid already submitted or to disclose information regarding his or her bid that should remain confidential;
- make agreements with other participants in the tender in order to agree on their respective bids, thus affecting the outcome;
- engage in deceptive conduct that could mislead the contracting party in the assessment of the possession of the requirements for participation in the tender, whether from the technical-economic-administrative or documentary point of view;
- omit due information or documents with the purpose of directing the decisions of Public Sector Representatives in their favour.

7.10 Management of litigation and judicial and extrajudicial settlement agreements

During litigation and/or settlement agreements (judicial and extrajudicial) with third parties, whether public (judicial authorities, chancellors, etc.) or private (outside attorneys, technical consultants, etc.), the conduct of parties acting on behalf of the Company must comply with the principles of transparency, fairness, objectivity and traceability, acting in good faith.

In any case, it is prohibited to:

- offer, promise, disburse or accept any request for money or other benefit to/from a Public Official, Judicial Authority or other private party in order to favour the Company or harm a party in a process (whatever the nature, e.g. civil, criminal, administrative or fiscal, labour,);
- offer money or other benefits, with the purpose of otherwise conditioning or any other conduct to induce a person to make false statements or not to make statements that can be used in a trial in the interest or to the benefit of the Company;
- provide benefits or monetary payments in favour of third parties (outside lawyers, consultants, etc.) working on behalf of the Company that are not adequately justified in the context of the contractual relationship established with them;
- intervene with or otherwise assisting a Public Official to act in a manner contrary to his or her official duties for the purpose of promoting or favouring the interests of Zignago S.p.A. and/or one or more subsidiaries.

7.11 Conflicts of interest

In the conduct of company activities and the most diverse relationships established by and with Group companies, situations must absolutely be avoided where the persons involved in the transactions are or may be in a conflict of interest, meaning the situation in which the Addressee pursues an interest other than that of the Group or performs activities that may, in any case, interfere with his or her ability to make decisions in the exclusive interest of the companies of the Zignago Vetro Group, or personally takes advantage of business opportunities of the Zignago Vetro Group.

In this regard, a system is in place of declaring ties with entities or companies with which internal resources have a personal interest (emotional, family, financial, political) with the correspondent and an obligation to withdraw or refrain from an activity when there is a potential conflict of interest.

With regard to figures who work on behalf of companies, the potential exposure to the occurrence of conflicts of interest is monitored, including the provision of an obligation for the employee, through a special contractual clause, to communicate any changes in requirements.

7.12 Due diligence of counterparties

In relation to specific categories of subjects (i.e. suppliers, business partners, etc.) or with reference to particular transactions, projects or activities (i.e. personnel selection or recruitment, donation and sponsorship initiatives, corporate transactions, etc.), it is necessary to carry out an audit or "due diligence" aimed at assessing the nature and extent of the corruption risk associated with entertaining relationships with said subjects or related to the performance of particular transactions, projects or activities.

The due diligence focuses on obtaining information to establish the potential or status of a corruption risk and is carried out according to the instructions contained in individual company procedures that regulate processes/activities at risk.

In any case, as a minimum requirement, all due diligence activities conducted by Group companies must include an analysis on potential red flags. Examples include, but are not limited to:

- insufficient, false and inconsistent information provided by the counterparty or apparent attempts to conceal the identity of the person at the top of the chain of control;
- transactions or requests that are inconsistent with the counterparty's business;
- cash or unusual requests for payment (i.e. in a high-risk country according to existing international indices);
- requests to structure a transaction in a way that circumvents normal accounting and reporting rules or such that shows no legitimate business purpose;
- use of consultants or other counterparts who have close ties to a government or political party, or who have been specifically referred by a public official or customer;
- lack of the skills, experience, or resources required for the type of activity;
- refusal to sign a contract;
- refusal to commit to this Policy and/or additional internal procedures adopted by the Group.

7.13 Human resources

The human resource management process must be carried out in accordance with the criteria of impartiality, transparency, autonomy and independence of judgment, as well as in accordance with the applicable regulations on privacy.

Specifically:

- the request for personnel is subject to verification of the actual need for resources;
- the process for selecting, evaluating and hiring personnel must take place:
  - consistent with the needs (organisational profiles of the requesting Division/Department) and in accordance with the approved staffing budget;
  - in compliance with the principle of segregation between the requesting functions and those making the selection, and must ensure that there are no conflicts of interest between those making the selection and the candidate;
  - adopting an approach informed by meritocratic criteria and ensuring perfect traceability and reconstruction of the responsibilities and reasons for the choices made;
- it is prohibited to hire employees and collaborators on the specific recommendation of third parties, representatives of the Italian or foreign Public Sector or representatives of other companies or however private law entities (e.g. customers, suppliers, contractual counterparties, competitors or other private law entities), in exchange for favours, compensation or other advantages for themselves or the Zignago Vetro Group, if the resource does not meet the requirements and qualifications necessary for their employment, even in relation to the requirements and qualifications of other candidates.
- it is prohibited to promise or make hires in favour of persons in any way referable to representatives of the Public Sector, Italian or foreign, or to Directors, Executives, officers, employees or in any case representatives of customers, suppliers, contractual counterparties, competitors for the sole purpose of influencing their independence of judgment or inducing them to secure any advantage for Zignago Vetro or its subsidiaries;
- the personnel evaluation process must be based on objective and transparent criteria, and the disbursement of any rewards must be made on the basis of objective, defined, formalised and shared criteria, as well as based on adequate levels of authorisation, putting in place sufficient measures to prevent the same from indirectly incentivising the performance of corrupt activities;

- personnel travel expenses are reimbursed only against proper authorisation and supporting documentation, within the limits and in compliance with the provisions of company procedures;
- all activities must be properly tracked and formalised, ensuring that relevant documentation is kept in appropriate files.

Please also refer to the Group's "Human Rights Policy" for further details on personnel relations management.

7.14 Gifts and entertainment expenses

Addressees are prohibited from offering, disbursing, promising or granting to third parties, as well as accepting or receiving from third parties, directly or indirectly, including on holidays, unauthorised gifts, benefits or other utilities (including in the form of sums of money, goods or services).

Only gifts of modest value that can be traced back to normal courteous relations or business practices are permitted, and in any case provided they are not such as to compromise the integrity and reputation of the parties, influence the Addressee's autonomy of judgement, or could be interpreted, by an impartial observer, as undertaken to acquire advantages in an improper manner.

The management of gifts by companies of the Zignago Vetro Group, in relation to the initiatives put in place by them as part of their commercial, marketing and communication strategies, must be limited to the cases set out by company procedures and are reserved exclusively for the company functions in charge of such and the personnel authorised to do so; in any case, any initiative consisting in the giving of gifts is tracked through company information systems.

Gifts, benefits or other utilities are considered to be of modest value if their nominal value (including taxes) does not exceed Euro 250 or an equivalent amount in foreign currency, per person. In any case, it is not permissible to divide a gift into several parts in order to reduce its economic value and thus bring it within the prescribed limits.

Forms of hospitality, whether accepted or offered, such as access to recreational activities (tickets or invitations to sporting or cultural events) or payment for travel and overnight stays in hotels, are permitted for promotional and commercial reasons or as part of courtesy relationships only if of modest value and in compliance with company procedures, with particular reference to the manner of acceptance and the limits on the amount allowed. They constitute, on the other hand, a corrupt practice if bestowed with the intent to obtain other, undue benefits or for the purpose of exerting improper influence.

No form of hospitality can ever be accepted or offered, regardless of its value, if it:

i) consists of a cash payment;
ii) violates anti-corruption laws or regulations;
iii) is not in line with the requirements of the Code of Ethics;
iv) is motivated by the purpose of obtaining an improper advantage, favourable treatment, or motivated by the desire to influence independent judgment.

Entertainment expenses incurred by Addressees (and in particular by employees), i.e. expenses for the provision of goods and services for promotional or public relations purposes, aimed at enhancing and improving the corporate image must be authorised in advance by the relevant corporate managers and within limits of amounts and cost-effectiveness and summarised in an expense report, with analytical reimbursement, approved by the head of the relevant department and reimbursed after verification of the validity of the supporting documentation. It is incumbent on the person who incurred the expense to specify the beneficiary, if any, especially if belonging to the Public Sector.

Any form of expense reimbursement to non-employees of the Zignago Vetro Group is prohibited if not provided for in the contract/letter of assignment (e.g. consultants), and in any case upon presentation of an invoice by the person.

With regard to the management of corporate events, such as participation in trade fairs or other commercial and other events, management is delegated to the Marketing function, which defines the relevant budget, manages the subscription of the participants, and verifies that any hospitality and gifts granted are offered to all Addressees in compliance with this Policy and other corporate procedures.

7.15 Donations and sponsorships

The Zignago Vetro Group favours initiatives that strengthen ties with the local area, supporting local companies and associations, public or private, in the areas of sports, social assistance and medical-scientific research or in favour of artistic initiatives, with the desire to contribute to the well-being of present and future generations.

- Sponsorships and donations, including through contributions in any form or the giving of free gifts of products for charitable purposes made to NPOs or non-profit associations, as well as for the carrying out of events or activities (e.g. seminars or studies on issues of interest to the company's business) may be granted in compliance with company procedures. In particular, the Addressees of this Policy authorised to implement donation/sponsorship initiatives must comply with the following principles: all sponsorships must be provided for within a budget that has been approved in advance by the relevant parties and that is consistent with the Group's objectives and activities;
- all initiatives must be authorised and formalised in appropriate documentation from which the contents, type and counterpart of the initiative, geographical area of reference, including from the point of view of impacts, the specific purposes and motivations underlying the disbursement are unambiguously evident;
- each request is analysed by the entities authorised for this purpose and both its economic sustainability and social impact are taken into consideration, the project or initiative presented having to be of high cultural, sports, social or charitable value. In accordance with criteria of reasonableness and proportionality, it is also ascertained in advance that the project to be financed or sponsored promotes purposes that can be traced back to the company's mission/vision and related values;
- the promoting management/function is required to acquire evidence of the actual use of the disbursed amount for the purposes originally pursued. Representatives of the Company involved in sponsorship activities are, in any case, prohibited from:
  - resorting to different forms of aid or contributions that, through the simulation, in terms of content and nature, of acts (e.g. sponsorships, handouts, appointments, consultancies, advertising, etc...) instead have unworthy purposes, especially with regard to anti-corruption;
  - promising or disbursing sums, or other benefits to Public Officials in a personal capacity or to private parties (e.g. Executives, officers or employees or in any case representatives of customers, suppliers, contractual counterparties, competitors) or to Public Sector Representatives and interest-representing associations for the purpose of gaining undue advantages for Zignago Vetro or its subsidiaries, including as a result of unlawful pressure from the company or the subsidiaries;
- the beneficiary of the initiative must first undergo due diligence checks aimed at ascertaining its credibility and good standing in order to verify its trustworthiness with respect to risks of creating funds to be used for corrupt activities;
- the grant disbursement process, if disbursed in cash, must be carried out through authorised banks/financial intermediaries;
- it is prohibited to offer or pay sponsorships and donations in case they may be interpreted as aimed at influencing independent judgment or obtaining favourable treatment or improper advantages;
- all transactions must be properly tracked and archived.

7.16 Confidentiality, bookkeeping and cash flow management

It is forbidden to use the information acquired in the performance of its activities for purposes unrelated to the strict performance of those activities. In particular, the Addressees of this Policy are required to:

- not disclose confidential commercial, industrial, financial and corporate information to third parties, unless necessary for the conduct of business activities and subject to signing a specific non-disclosure undertaking;
- keep with the utmost care, in a safe place, any confidential information they may have.

Each employee, to the extent of his or her competence and in relation to the tasks assigned to him or her, is required to co-operate to the fullest extent possible so that the operating events are correctly and promptly represented in the company accounting system and to keep all supporting documentation so that it can be found and consulted by the internal and external parties in charge of control activities.

All transactions of a financial nature, as well as all incoming and outgoing money movements, must be carried out by individuals with the relevant powers, subject to prior authorisation, and must always be justified, tracked and recorded.

Unauthorised access to the data, information or programmes contained in computer systems is prohibited. For this purpose, it must be ensured:

- that suitable systems are adopted for recording access (computer authentication) to processing systems and electronic files;

that computer systems are protected by a profiling mechanism that ensures access to transactions in relation to the tasks and functions of each user.

8. POLICY DISSEMINATION AND VIOLATION REPORTING SYSTEM

8.1 Communication and Training

The Zignago Vetro Group is committed to ensuring the maximum dissemination, together with the Code of Ethics and the Organisation and Management Model pursuant to Legislative Decree No. 231/2001 (where adopted), of this Anti-Corruption Policy to all Addressees through the Group's internal (corporate intranet) and external (website) communication channels to external counterparties and in general to all parties who have relations with the Group and who may expose it to a risk of corruption.

In addition, the Group organises mandatory training sessions for all employees of the Zignago Vetro Group dedicated to corruption risks, tools to prevent corruption, the contents of this document, and relevant regulations. These initiatives are aimed at ensuring the dissemination and proper understanding of the principles expressed in this procedure, raising awareness of the Zignago Group's company representatives of possible risk situations, the appropriate conduct to be adopted.

All Addressees of this Policy are expected to be familiar with the document and to contribute, to the extent within each person’s remit, to its compliance.

The Group's Code of Ethics and this Policy are also brought to the attention of all those who have contractual relationships with Group companies and are available to all stakeholders on the Group's institutional website.

8.2 Violation reporting system

All Addressees are required to promptly report attempted, alleged or actual acts of corruption of which they become aware and any other violations of the Anti-Corruption Policy and anti-corruption regulations.

The report must be substantiated and thus contain precise and concordant facts of which the reporter has become aware by reason of the duties performed, reasonably sufficient to initiate an investigation. Any reports lacking the elements defined within the aforementioned procedure may not be taken into consideration; clarifications may also, if appropriate, be requested, which the reporter may not deny without justification.

Reports in compliance with the provisions of the Code of Ethics, the Organisation and Management Model pursuant to Legislative Decree No. 231/2001 (where adopted), and this Anti-Corruption Policy may be sent in the manner and through the reporting channels that the Group has appropriately established and in accordance with the provisions of the “Whistleblowing Procedure" to which reference should be made for the relative provisions.

Reporters will be guaranteed against any form of retaliation, discrimination (direct or indirect) or penalisation for reasons related directly or indirectly to the report. The confidentiality of the identity of the reporter will also be guaranteed, subject to the legal obligations and the protection of the rights of individuals.

8.3 Violations and penalty consequences

Compliance with the rules of the Anti-Corruption Policy must be considered an integral part of the contractual obligations of employees, collaborators and, more generally, of all Addressees.

Any violation of the provisions of this Policy will make the measures based on their severity and within the limits of the relative regulatory framework applicable.

In terms of employees, non-compliance may result in disciplinary and punitive measures up to and including the termination of employment.

With reference to third parties, any violation of the provisions contained in this document may result in severe consequences, including suspension of the execution of contracts and/or the withdrawal from contracts or their termination for non-performance, as well as the prohibition of business relations with the Zignago Vetro Group and, where there are grounds, compensation for damages.

8.4 Monitoring and internal audit

In order to ensure the effectiveness and adaptation of the measures to prevent and combat the risk of corruption, the anti-corruption compliance programme adopted by Zignago Vetro and its Subsidiaries in Italy is evaluated on an ongoing basis, also through external professionals and the actors of the Internal Control system (Internal Audit, Supervisory Board - where existing - Control, Risks and Sustainability Committee)

In this regard, a periodic verification activity is planned in compliance with the principles and rules of conduct contained in the Policy, i.e. their effectiveness and appropriateness for the containment of corruption risks. The results of these audits must be reported to Zignago Vetro Group management to highlight any significant violations of the Policy or deficiencies in its adequacy.

The anti-corruption safeguard is in addition supported by the accounting controls also performed by the external auditor, who will have access to all records, accounting entries and related documentation, duly filed. In the principles also established in the Code of Ethics, the accounting must meet the requirements of truth, completeness and transparency. In this regard, it is, therefore, mandatorily established that all operations or transactions, always legitimate, authorised, consistent with the decision-making, authorisation and consequent implementation processes, accompanied by appropriate supporting documentation, may easily be reconstructed in formal terms accurately recorded in the relevant books and records of the Company following the criteria indicated by law and the applicable accounting standards.

9. Approval and Update of the Anti-Corruption Policy

Zignago Vetro S.p.A. approves by Board of Directors' resolution this Anti-Corruption Policy and promotes its adoption by all its subsidiaries, which will autonomously adopt this document by resolution of their administrative bodies, adapting it, where necessary, to the specificities of each company, consistent with their management and organisational autonomy.

This Anti-Corruption Policy is periodically reviewed to ensure its effectiveness over time and its compliance with changes in legislation and practice, ensuring that it always remains active, enforced, appropriate to the Group's context and the objectives set, and complies with applicable regulations on the prevention of corruption.

In any case, all business units/functions are required, to the extent of their competence, to report operating events or any findings of critical issues that result in the need for the adjustment of this document and to suggest improvements.

Any amendments and/or updates to this Anti-Corruption Policy will be approved by the same administrative body and promptly communicated to the Addressees.

This document is made available through publication on the Company's intranet and corporate website.

Fossalta di Portogruaro, July 24, 2025