Conflict Minerals Policy of the Zignago Vetro Group

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1. The Zignago Vetro Group - Introduction

The Zignago Vetro Group (hereafter also the “Group” or “ZV Group”), based in Fossalta di Portogruaro, is a leader in Italy and Europe in the production and marketing of glass containers for an extremely broad and diversified range of sectors, and in particular for Beverages, Food, Cosmetics and Perfumery. The Group’s Production Sites are located in Italy, France and Poland.

It is also engaged in the collection and treatment of raw glass, from municipal waste collection, through three plants located throughout Italy and uses recycled glass as its main raw material.

Zignago Vetro is part of an industrial group led by Zignago Holding, a company that operates not only in the glass industry, but also in other sectors, including wine-making and the production of electricity from renewable sources.

In order to integrate the principles of sustainability into its Business Model, the ZV Group has decided to create an ***ESG framework.*** The ESG Policy and the Ethics Code form the cornerstones of this framework, and are designed to promote the principles of legality, fairness, equality and transparency, in addition to those of sustainability.

By establishing consistent policies, the framework also seeks to govern relationships with key stakeholders in order to share and spread these principles, both within the company and externally.

The ZV Group supports the fight against violence, human rights violations, and environmental degradation in the extraction and marketing of certain minerals or other derivatives (in particular, tin, tantalum, tungsten, and gold) from geographic areas indicated as "Conflict Regions”.

2. Scope, Objectives and Addressees

This ***Conflict Minerals Policy*** has been adopted by the ZV Group to comply with international regulations for the avoidance of the use of minerals whose proceeds could finance bloody conflicts in geo-politically unstable areas such as Central Africa.

The term "Conflict Minerals" may apply more or less broadly depending on the applicable rules and regulations. In general, it refers to four chemical elements: gold, tantalum, tungsten, and tin (also collectively referred to as "3TG").
On the basis of this Policy, the ZV Group aims to operate in a socially responsible manner, and undertakes in good faith not to purchase minerals originating from conflict zones.

Similarly, this Policy extends to its suppliers who, by signing the Supplier Code of Conduct, have undertaken to comply with the Group’s instructions on the matter.

The addressees of this Policy are employees, suppliers and subcontractors of the ZV Group.

3. Application

This Policy applies to all Group companies, and specifically: Zignago Vetro SpA, Zignago Vetro France SaS, Zignago Vetro Polska SA, Zignago Glass Usa Inc, Vetro Revet Srl and Italian Glass Moulds Srl.

Each of the above companies shall operate in accordance with this Policy, without prejudice to the fact that compliance with the national law in force in the country in which the Company operates and European law, where applicable, shall prevail.

The ZV' Group's commitment is outlined through the following activities/actions:

- designing and developing products that do not contain Conflict Minerals and to making no use whatsoever of metals and components from the conflict zones described above;
- ensuring compliance and the continued upholding of Conflict Minerals regulations;
- Supply chain traceability: in the case of materials that may have an uncertain origin, the Group reserves the right to question its suppliers on the origin of purchased minerals by verifying their traceability;
- Risk assessment and management, through appropriate measures that may include the consideration of alternatives for metals whose source may not be verified;
- Communication with suppliers to ensure compliance with the ZV Group's Ethics Code and standards;

Training for categories of employees potentially involved in purchasing processes.

In order to adapt its operations to the regulations on Conflict Minerals, the ZV Group sets out to build a solid Management System composed of this policy and the Supplier Code of Conduct.

Similarly, the ZV Group **REQUESTS** that its suppliers avoid the use of metals from conflict zones and ensure that an adequate evaluation process is in place to ensure the origin of the metals used both by them and in their supply chain. For this purpose, the ZV Group undertakes specific Audits (Due Diligence).
If the supplied products contain, even unintentionally, at least one of the materials regulated by the rules on ***Conflict Minerals*** (and their derivatives), the supplier will have to inform the ZV Group, through its own company contact persons, about both the presence and the origin of such materials.
Where the origin of one or more metals covered by this Policy is "suspicious", the ZV Group suggests to its suppliers to use a specific format to report any discrepancies. We provide below, as an example, the Conflict Minerals Reporting Template (CMRT) questionnaire prepared by the Conflict-Free Sourcing Initiative (CFSI) and downloadable as a spreadsheet from www.responsiblemineralsinitiative.org

(http://www.responsiblemineralsinitiative.org/media/docs/RMI_CMRT_6.01.xlsx)

Addressees, upon request, are required to provide the ZV Group with all the information necessary for a proper and complete evaluation, including full traceability, and in the case of an external audit or Due Diligence requested by the supplier itself. Where the addressee is unable to comply with all or part of this Policy, they must promptly inform the ZV Group.

Similarly , the ZV Group is committed to informing its customers immediately if there are any changes that result in this policy becoming invalid.

Similarly, in the event of non-compliance with the provisions of this Policy, addressees are required to implement any actions required to meet the standards in question.

The Group reserves the right to periodically evaluate any non-compliance by suppliers with this Policy and to request that adjustments are made immediately. In case of repeated non-compliance with this Policy, failure to co-operate with an explicit request for compliance or to provide required documentation, the ZV Group reserves the right to interrupt and/or terminate the business relationship.

In the event that addressees become aware of a violation of this *Policy*, they are encouraged to report it in writing by activating of the ZV Group specific *Whistleblowing* procedure.

Any form of retaliation, discrimination or penalisation, whether direct or indirect, against those making a report and for reasons directly or indirectly related to the report itself, is expressly forbidden.

The Group undertakes to protect the identity of the informant and the reported party, without prejudice to the obligations of the law and to the protection of the rights of the ZV Group or of persons accused wrongly and/or in bad faith.

4. Governance

Within the Zignago Vetro Group, the responsibility for the implementation and communication of the principles contained in this Policy is assigned to the members of the Executive Committees of the Group companies, and thereafter to all the managers and heads of every company function, with particular emphasis on the Purchasing function.

5. Sources

The regulatory setting in which the Conflict Minerals Rules are framed has two fundamental pillars: the Dodd-Frank Wall Street Reform and Consumer Protection Act legislation and the subsequent legislation which applies throughout the European Union, i.e. the EU Conflict Minerals Regulation (2017/821).

European Regulation 821/2017, which came into force in 2017, also brings with it certain obligations for importers, which apply from January 1, 2021.

The regulation may be considered the European equivalent of the U.S. Conflict Minerals Act (Article 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act). In fact, it was created in order to prevent profits from the trade of certain minerals and metals from being used to finance armed groups responsible for conflicts and human rights violations in a number of countries in which mines are located.

With Legislative Decree No. 13 of February 2, 2021, (Legislative Decree 13/2021), the Italian legislature implemented the European Union regulations, regulating the procedural aspects of the controls operated by the National Competent Authority for Responsible Minerals and Metals (“ANC3TG”) and the related corrective measures and sanctions

The ZV Group takes into consideration both the provisions issued by European Regulation 821/2017 and Legislative Decree No. 13/2021 dedicated to conflict minerals.

6. Review

This Policy is subject to a review mechanism that provides for its updating on each occasion that there is a significant change in its contents and in any case at least every two years. Responsibility for its review lies with the Zignago Vetro Group’s ESG Committee, consisting of some of the Group's most senior Executives, the majority of whom are members of the Internal Executive Committee, to ensure that all key corporate functions are represented in the management of ESG issues.