ZIGNAGO VETRO

ZVG CONFLICT MINERALS POLICY

CONTENTS

1. **Zignago Vetro Group - Introduction** **2**
2. **Regulatory Framework** **2**
3. **Addressees** **2**
4. **Scope of application** **2**
5. **Monitoring and Compliance** **3**
6. **Governance** **3**
7. **Review** **4**

Review	Approval Date by ESG Committee	Changes made
0	02/03/2021	First edition
1	13/10/2021	Added Governance and Review sections

1. ZIGNAGO VETRO GROUP - INTRODUCTION

The Zignago Vetro Group (hereinafter also ZVG or the Group), with registered office in Fossalta di Portogruaro, is an Italian and European leader in the production and sale of glass containers.

ZVG 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 addition to Italy, the Zignago Vetro Group is present in France, Poland and the USA.

In order to integrate the principles of sustainability into its Business Model, ZVG 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 ***Conflict Minerals Policy*** has been adopted by ZVG 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, ZVG, which aims to operate in a socially responsible manner, undertakes in good faith not to purchase minerals originating in 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 subject.

2. REGULATORY FRAMEWORK

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

3. ADDRESSEES

The addressees of this Policy are employees, suppliers and subcontractors of ZVG.

4. SCOPE OF APPLICATION

This Policy applies to all Group companies, and specifically: *Zignago Vetro SpA, Zignago Vetro Brosse SaS, Zignago Vetro Polska SA and Zignago Glass Usa Inc.*

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.

5. MONITORING AND COMPLIANCE

The Group is committed to 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.

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

Similarly, ZVG **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.

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 ZVG, 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", ZVG suggests using a specific format. Included as an example is 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 must, upon request, provide ZVG with all information necessary for a precise and thorough assessment. If the addressee is unable to comply with all or part of this Policy, they must promptly inform ZVG.

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 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, ZVG 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 ZVG's 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 ZVG or of persons accused wrongly and/or in bad faith.

6. 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.

7. 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.

Fossalta di Portogruaro, October 13, 2021