ZVG MANAGEMENT SYSTEMS CORPORATE POLICY

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Review	Approval Date by ESG Committee	Changes made
4	23/05/2023	Added Energy related topics
3	13/10/2021	Added Governance and Review sections

1. MISSION AND VALUES

The Zignago Vetro Group's mission (hereafter also ZVG or the Group) is to produce and market hollow glass containers for a range of market segments, in particular the food and beverages and cosmetics and perfumery sectors, with a particular focus on sustainability and with the aim of providing its customers with high quality, safe products while guaranteeing ongoing value creation for its shareholders and stakeholders.

The founding **values** shared by the Group are:

- rigour in the performance of work at all levels;
- transparency in internal and external relations;
- an ethical approach to corporate conduct;
- passion in the implementation of the Group's mission;
- Sustainability as an integral part of the strategy of Zignago Vetro Group

2. APPLICABILITY

This ZVG management systems corporate policy (hereinafter also "corporate policy") applies to all companies in the Zignago Vetro Group, and specifically: *Zignago Vetro SpA, Zignago Vetro Brosse SaS, Zignago Vetro Polska SA and Zignago Glass Usa Inc.*

It also applies, where relevant, to all third parties (suppliers, consultants and other types of external party) that operate at the Company's sites, and in particular to those parties operating as contractors or subcontractors, in addition to suppliers of the Zignago Vetro Group. The latter are required to comply with the *Supplier Code of Conduct*, which is also based on this Corporate Policy.

3. CORPORATE POLICY STATEMENT

The Zignago Vetro Group's corporate objective is to satisfy its customers and meet the expectations of all the stakeholders. It achieves these goals by creating products that satisfy all regulatory, legal, safety and standards requirements, and which are produced sustainably and in compliance with the ethical principles that the Company has adopted.

Specifically, through its various companies, the Zignago Vetro Group undertakes to:

- respect all applicable laws, corporate policies and guidelines, in addition to all those external regulations to which the Group subscribes;
- create a collaborative, inclusive and socially sustainable working environment that respects the international regulations and conventions regarding the recognition, promotion, development and exchange of professionalism and knowledge, whether individual or collective, through management that is based on the principles of fairness, merit, integrity, equal opportunities and respect, and which serves to promote and protect its employees;
- operate in respect of the global ethical principles that protect the interests and rights of all its stakeholders;
- guarantee the efficacy, efficiency and transparency of its management systems by implementing procedures, operational instructions, programmes and tools that enable the promotion and monitoring of those activities designed to help the Group achieve its goals as set out in this document;
- through periodic internal audits, risk and opportunity assessments and management reviews, constantly verify that the principles and specific objectives it has identified are achieved as planned, and that continuous improvement is pursued;
- circulate this Corporate Policy, ensure that it is understood and applied at every level and that it is

available to all stakeholders;
- ensure sufficient resources and access to the information necessary for the organisation to be able to achieve its goals and objectives;

In addition to these undertakings, which apply to every area of the Group's operations, the Zignago Vetro Group has identified the following commitments in each specific area.

3.1 *Environment and Energy*

- Adopt an Environmental and Energy Management System that guarantees control of environmental and energy aspects both during ordinary operations and emergency conditions;
- Where financially appropriate, research and implement innovations in processes and throughout the entire product life-cycle to reduce the Group's air, water, soil, waste, noise, fumes and pollution impact;
- Reduce the impact of production activities in protected areas, in order to safeguard biodiversity and respect the ecosystem;
- Continuously monitor and improve the energy efficiency of production activities and reduce direct and indirect greenhouse gas (GHG) emissions, also through the generation and use of renewable energy;
- Optimise the use of water resources and guarantee the quality of wastewater;
- Use sustainable resources by increasing the amount of raw glass and reducing the amount of virgin raw materials and associated energy consumption;
- Promote activities to prevent pollution and minimise environmental impact;
- Reduce the use of hazardous substances and/or replace them with non-hazardous alternatives, and limit the use of chemical products;
- Responsibly manage product end-of-life through suitable recycling and waste disposal;
- Promote sustainable consumption by offering increasingly eco-friendly glass containers, as well as through initiatives to raise customer awareness of the environmental impacts associated with product use and their correct disposal;
- Introduce the concepts of ecodesign and life cycle assessment into the design and development of new products, in order to reduce their associated environmental and energy impacts, containing as much as possible their carbon footprint;
- Promote the integration of the production chain by collaborating with Group companies to take concrete steps towards the creation of a circular economy.

3.2 *Health and Safety in the Workplace*

- Take all necessary steps to constantly reduce risk in the workplace, in order to prevent accidents, injuries and occupational illnesses.
- Involve employees, trade unions and third-party operators operating at the Group's sites in discussions regarding occupational health and safety.

3.3 *Food Safety*

- Adopt a Food Safety plan for the production of containers, to be based on risk assessment criteria;
- Set out the methods for both internal and external communication related to the Food Safety Management System;
- Guarantee the resources required for the Food Safety Management System;
- Promote products through measures to safeguard final consumers, implementing and maintaining the processes designed to create these products in accordance with the requirements of stakeholder customers and the law;
- Pursue the objectives of food safety throughout the production chain in regards to packaging protection

and product vulnerability and chain of custody;
- Ensure that staff are equipped with the necessary skills and culture regarding food safety.

3.4 *Human resource management*

Zignago Vetro Group, fully aware of the fundamental role played by its human capital, both in terms of individual professionalism and collective management, guarantees a dynamic, productive and engaging work environment respectful of the needs of its workers, by committing itself to:

- Ensure the involvement of employees (within the scope of their duties) by effectively providing information, education and training activities to help increase awareness of their roles and responsibilities;
- Efficiently organise and manage career development to ensure that all staff are adequately trained and evaluated to enhance the skills and knowledge of each member of personnel;
- Promote open communication by creating opportunities for dialogue between staff representatives and trade unions;
- Foster optimal working conditions and support work-life balance (remote working, flexible schedules, exchanges and participation);
- Ensure fair and equitable remuneration consistent with and in accordance with regulations and collective agreements, in addition to ensuring that the gender pay gap is addressed.

3.5 *Business Ethics and protecting human rights*

The Group operates in full respect of universal human rights, setting itself the following objectives:

- Raise the awareness of its stakeholders in managing activities in full respect of universal human rights (cultural, social and political);
- Adopt measures to prevent and counteract all child and forced labour;
- Counter discriminatory conduct and promote respect for diversity, inclusion and equal opportunities;
- Persevere in opposing corruption, bribery, fraud and money laundering offences and anti-competitive practices;
- Protect the privacy rights of its stakeholders and guarantee information security;
- Prevent activities or situations that might cause conflicts of interest between individuals and the Group.
- Guarantee the correctness of public information and marketing messages;
- Ensure secure whistleblowing channels and a procedure for reporting violations of applicable laws or the principles of the Ethics Code by internal or external parties related to the company.

3.6 *Sustainable purchases*

The Zignago Vetro Group promotes a culture of sustainability throughout the entire supply chain, and undertakes to pursue the following specific objectives:

- Guarantee the supply chain selection and qualification process by constantly monitoring sustainability aspects;
- Engage with suppliers of products and services who adopt environmental, energy efficiency, ethical, working and human rights practices that are in line with this corporate policy and with the principles of ethical and sustainability responsibility applied by the Group, both within their organisations and in the supply of their products or services, as set out in the Zignago Vetro Group Supplier Code of Conduct;
- Prefer the purchase of eco-friendly materials and goods and/or from recycling or reuse supply chains;
- Refrain from purchasing products or materials containing minerals from conflict zones.
- Give greater consideration to local suppliers in support of the development of local communities.

3.7 *Continuous Organisational Improvement*

- Maintain high standards of innovation and product development in order to meet the changing needs of the customer and the market in general, ensuring customised solutions through dedicated production and compliance with regulatory and qualitative standards, both internally and/or as agreed with the customer.
- Ensure that the company remains flexible and competitive by pursuing continuous product and process improvement through the involvement of every company function, and systematically identifying the expectations of stakeholders;
- Continuously improve production processes by adapting the type of machinery used, materials chosen and the requirements and criteria employed in carrying out these processes, ensuring long-term competitiveness and therefore the development of business activities and constant innovation in products and processes.

4. GOVERNANCE

Within the Zignago Vetro Group, the responsibility for the implementation and communication of the principles contained in this Corporate 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.

5. REVIEW

This Corporate 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, having received the opinion of the Control, Risks and Sustainability Committee.

Fossalta di Portogruaro, May 23, 2023