Zignago Vetro Group Human Rights Policy

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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 (VE), 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 Zignago Vetro Group has drawn up a Human Rights Policy out of the conviction of its need and responsibility to promote observance of fundamental human rights in all possible ways. The ZV Group intends to integrate respect for human rights into all company functions, strategies, day-to-day operations and relations with all its stakeholders. The Group also intends to promote and adhere to the ten principles of the Global Compact and the main internationally recognised standards.

2. Scope, objectives and addressees

The Scope of this Human Rights Policy of the ZV Group is to publicly express its willingness to respect and defend human rights.
The objective is to integrate these principles into its business and all business dealings.

The Group is fully aware that:

- All companies have a responsibility to respect human rights and prevent all forms of abuse, acting "responsibly" and to avoid greater social costs;
- Companies that promote and integrate respect for human rights into their activities reduce operational and regulatory risks;
- Companies that promote respect for human rights may obtain numerous benefits in relations with stakeholders, in reputational terms and in their ability to attract top talent.

The addressees of the Human Rights Policy of Zignago Vetro covers all employees, and indirectly the customers, suppliers, sub-suppliers and in general all stakeholders.

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 ZV Group company is committed to establishing and implementing training and awareness programmes designed to ensure that employees and other stakeholders have a thorough understanding of human rights and the implications of their actions.

The ZV Group considers the respect of Human Rights an essential requirement of its activities.
In particular, in accordance with Principles I and II of the Global Compact, the Group extends respect for human rights to its entire sphere of influence and undertakes to ensure that it is not complicit, directly or indirectly, in any form of abuse.
In the various processes implemented, the main human rights that may be directly or indirectly influenced have been identified:

- **Right to work.** In particular, the ZV Group, in reference to the Global Compact, promotes: Principle III (freedom of association and recognition of the right to collective bargaining), Principle IV (elimination of all forms of forced and compulsory labour), Principle V (effective abolition of child labour) and Principle VI (elimination of discrimination in respect of employment and occupation); each worker signs an employment contract written in his/her own language, formalising all conditions that will comply with national laws or with international best practices. These include the right to fair pay commensurate with one's function and company level, as well as access to free training for professional and personal development. The ZV Group is committed to using Smart Working wherever possible and functional. The Group places special emphasis on maternity rights, parental leave and the related return to pre-existing employment.
- **Right to Social Dialogue.** The ZV Group pays special attention to structuring strong relationships with employee representatives and trade unions in order to ensure direct and effective social dialogue and protect employee rights.
- **Right to Health and Safety**. The rights to health and safety must be assured and promoted for all individuals generally, as well as in the workplace. The ZV Group is committed to promoting and spreading a corporate culture of health and safety in the workplace and to maintaining high standards in terms of prevention and training at all times. The Group is committed to strengthening the long-term plan of Welfare for all employees focusing on both the short and long term.
- **Equal opportunities and non-discrimination.** In terms of religion, age, gender, sexual orientation, gender identity, origin, race, language, disability, political opinion and social condition. The ZV Group is committed to ensuring maximum inclusion and equal opportunities in personnel selection interviews, employee performance evaluation, the specific needs of individuals, compensation policy, and the internal organisation of the Group companies. The ZV Group considers any form of systematic harassment or violence as contrary to its Principles and to constitute a violation of this Policy, as well as of its Ethics Code.
- Respect for **local communities.** The Group undertakes to support and respect local culture and customs and historic and artistic heritage and traditions. It undertakes to contribute to the well-being and economic development of all communities in which it operates through responsible, useful initiatives;
- **Right to Privacy**. The ZV Group considers the right to privacy to be a fundamental human right, as enshrined in the International Covenant on Civil and Political Rights.

4. Sources

In drafting the Policy, the following external and internal references were considered:

- **Universal Declarations of Human Rights:** (The Universal Declaration of Human Rights (UDHR) of 1948, International Covenant on Civil and Political Rights (ICCPR) of 1966, International Covenant on Economic, Social and Cultural Rights (ICESCR) of 1966, European Convention for the Protection of Human Rights and Fundamental Freedoms of 1950);
- **International treaties and conventions**: the main Conventions of the International Labour Organisation (ILO), UN Conventions on the Rights of the Child (UNCRC), the ILO Declaration on Fundamental Principles and Rights at Work 1998 and 2022, ILO Conventions on the Rights of the Indigenous and Tribal Peoples;
- **Guidelines for Enterprises**: UN Global Compact (UNGC), Global Reporting Initiatives (GRI, SASB), World Business Council for Sustainable Developments, Italian Constitution;
- **Internal documents and policies**: 231 Model, Ethics Code, ESG Policy, National Labour Agreement, trade union agreements.

5. 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 Human Resources function.

The ESG Committee will act as a guarantor for the implementation of this Human Rights Policy and will periodically review any human rights issues of concern within the Group. Mechanisms have been implemented and facilitated for all Group companies (Whistleblowing Policy) aimed at reporting to an Independent Body possible violations of the Ethics Code or Human Rights Policy of the ZV Group.

6. Monitoring and Review

This Policy is subject to a review mechanism that provides for its updating each time there is a significant change in its contents (consistently with the continuous changes in the external Human Rights context, perhaps the most complex and "sensitive" issue for all stakeholders, both direct and indirect) 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.