Supplier Code of Conduct

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.

2. Scope and addressees

This document is drawn up so as to ensure that the Zignago Vetro Group collaborates with business partners demonstrating the same commitment to the values pursued by the Group, with particular reference to the Code of Ethics, and to Corporate Social Responsibility in general.

The addressees of this document are all suppliers and sub-suppliers of the ZV Group.

3. Application

This Code of Conduct applies to all Suppliers of the Zignago Vetro Group 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.

Where minimum standards are not met, the Zignago Vetro Group will work with suppliers to take corrective action within an appropriate timeframe. Where a provider is unable to correct the non-compliance, the relationship may be terminated.

Suppliers are required to comply, in particular, with the following:

3.1 Respect for Human Rights and Social Practices. This covers:

3.1.1 Compliance with the provisions of law and this code

Suppliers must comply with all applicable laws and regulations, in addition to the principles set out in this Code. These principles must be incorporated into the suppliers' operations and communicated to all individuals employed by the Supplier. Suppliers should also take appropriate steps to ensure that their Suppliers, and more broadly those across the value chain, comply with the same principles.

3.1.2 Protection of children and prohibition of child labour

The Suppler recognises the human rights of children, such as the right to education, the right to play, and the right to basic needs, and complies with the definitions from the International Labour Organization (ILO) on the minimum age for employment and hazardous work, while respecting children's rights and the company's principles. The Supplier will take the necessary measures and steps to identify, prevent and address child labour issues that it may create, to which it may contribute or to which it may be linked as part of its business relationships

No personnel who are under the age stipulated by the International Labour Organisation shall be employed, which generally requires workers to be at least 15 years of age for non-hazardous situations and at least 16 years of age for positions identified as potentially hazardous. Neither should any personnel be employed who are younger than the age stipulated by the jurisdiction of the country in which they operate.

Workers under the age of 18 shall not be employed for night work or in conditions that are dangerous or otherwise unsafe for their physical and mental health and development.

3.1.3 Working hours

The Supplier recognises that issues in terms of work-life balance may arise and the right to rest and leisure. The Supplier will comply with applicable laws and any collective agreements regarding working hours and paid vacations. It shall seek to ensure that all employees have a balance between their working demands and their personal needs. The Supplier shall comply with applicable laws and ILO Conventions regarding working hours and weekly rest.

More specifically, working hours must comply with national laws and collective bargaining agreements, and in any case must comply with internationally recognised standards, such as the standards issued by the International Labour Organisation.

Overtime must be voluntary and it must be ensured that all employees are entitled to at least 1 day off for each consecutive seven-day period.

3.1.4 Working conditions, prohibition of forced, bonded and compulsory labour.

The Supplier opposes forced labour, as defined by the ILO, and condemns the use of all forms of forced or compulsory labour, including forced prison labour, debt bondage, forced labour, and modern forms of slavery and any form of human trafficking present in our value chain. The Supplier will strive to ensure that all employees enjoy freedom of movement and are not restricted by physical restraints, abuse, threats, and other practices such as withholding identity documents and valuables; it will also strive to ensure that all employees have the right to work freely, are aware of working conditions, and are regularly paid. The Supplier will take the necessary measures to identify, prevent, and combat forced labour that it may be the cause of, contribute to, or be linked to as part of its business relationships.

Every worker should be free to accept employment or resign, and there should be no form of restriction such as withdrawal of documents (ID, passport, work permit, etc.).

Suppliers must ensure that employees are not required to make deposits or payments to employers or providers of work to obtain work.

3.1.5 Fair wages and earnings

The Supplier shall recognise fair and competitive remuneration to all employees, in line with applicable ILO Conventions, taking into account the needs of employees and their families. Wage agreements are established on the basis of comprehensive principles, using structures that reflect local market practices and values and comply with business and legal requirements.

Employee pay must be fair for the work performed. The minimum wage established in the country of operation must be observed or, if this does not exist or is not sufficient to meet

basic needs, the supplier should agree to pay employees enough to ensure a decent standard of living sufficient to meet the basic needs of employees and their families.

3.1.6 Diversity, inclusion and integration; prohibition of discrimination and harassment.

The Supplier values diversity and inclusion and condemns all forms of discrimination and harassment, any inappropriate or disrespectful behaviour, such as physical and verbal abuse and sexual harassment in the workplace or at work events.

It will endeavour to take proactive measures to promote equal opportunities for all employees, including temporary and interim workers, seasonal workers, and those working in a country other than their country of origin or nationality. The Supplier will comply with the ILO Conventions on discrimination and labour migration. Suppliers will take the necessary measures and steps to identify, prevent, and reduce discrimination that they may be the cause of, contribute to, or relate to as part of their business relationships.

Employees must be treated fairly and impartially based only on their individual skills and qualifications. Discrimination on the basis of, for example, race, national origin, gender, age, physical characteristics, social background, disability, union membership, religion, marital status, pregnancy status, sexual orientation, or gender identity must not be practiced.
The work environment should be inclusive and supportive and no form of harassment should be enacted.

3.1.7 Freedom of association and collective bargaining

The Supplier recognises the right of its employees to form and join a union of their choice and the right to collective bargaining without fear of intimidation or reprisal. The Supplier will take the necessary measures and steps to identify, prevent, and counteract discriminatory behaviour in the context of applications, decisions on training, awards, career advancement, dismissals, or transfers related to union organisation, membership, and activities. The Supplier shall comply with the ILO Conventions on Freedom of Association, Collective Bargaining and Workers' Representation.

The development of a constructive and meaningful social dialogue of the Supplier with workers' representatives is encouraged.

3.1.8 Health and safety

The Supplier recognises employees as having a key role at the general company level. In accordance with the ILO Convention on Health and Safety, the Supplier will continuously strive to take the necessary measures and steps to provide and maintain a safe and healthy working environment for all employees by managing identified risks, implementing preventive measures, evaluating the effectiveness of these measures, and seeking continuous improvement. The Supplier complies with applicable occupational health and safety laws and will strive to develop an appropriate occupational health and safety culture in the company.
The Supplier shall regularly identify and assess health and safety hazards and, when possible, eliminate them by taking effective measures to prevent potential accidents and injuries and by providing appropriate personal protective equipment when necessary.

In addition to the above, the Supplier is required to observe and comply with the provisions of the Zignago Vetro Group's "Human Rights Policy" and "Data Privacy Policy."

3.2 Respect for Environmental Protection and Environmental Sustainability. This covers:

3.2.1 Environmental management

The Supplier recognises that the protection of the environment is essential for the protection and respect of human rights and therefore will work to protect the ecosystem.

In particular, suppliers should have systems in place to ensure that waste, atmospheric emissions and wastewater are managed safely, including systems in place to prevent and contain accidental spills into the environment.
The Zignago Vetro Group therefore encourages its suppliers to:

- set up an environmental management system;
- optimise its consumption of natural resources, including energy and water, preferring the use of renewable resources;
- minimise the impact on the environment by reducing air, water and soil pollution, greenhouse gas emissions and waste production;
- improve environmental performance throughout the life cycle of products;
- implement biodiversity conservation measures.

3.2.2 Ban on deforestation and peat development

The Supplier will take necessary measures to ensure that its actions do not adversely impact forests, peatlands and other protected lands of any kind. In addition, the Supplier shall not expand its operations to high carbon stock forests, high conservation value areas (High Conservation Value: HCV): Natural habitats where biological, ecological, social or cultural values are of exceptional national, regional or global importance or critical local importance) or to protected areas.
When starting new activities or expanding existing ones, the Supplier will obtain all legally required permits and approvals. The Supplier will keep supporting documents related to land use history and to provide them upon request.

3.2.3 Biodiversity

The Supplier will take necessary measures to ensure that biodiversity is preserved in all its activities and throughout the supply chain. When starting new activities or expanding existing ones, the Supplier will endeavour to take the necessary measures to protect areas of high conservation value and promote biodiversity. The Supplier will keep supporting documents related to land use history and will provide them upon request.

3.2.4 Air quality and ecological footprint

The Supplier will, as far as possible, take the necessary measures to minimise emissions and air quality impacts, and will implement practices to monitor and reduce its carbon footprint by providing proof of such where requested.

3.2.5 Conservation and management of water resources

The Supplier will, as far as possible, take the necessary measures to minimise the impact on water resources by reducing water consumption, ensuring the maintenance or improvement of groundwater quality, and promoting the conservation of water resources. It shall take the necessary steps to provide proof of its water footprint where requested.

3.2.6 Waste management

The Supplier will take the necessary measures to minimise waste generation and the consumption of natural resources. The Supplier will adopt good waste management practices, reducing its footprint and promoting the circular economy.

3.2.7 Management of chemical products

The Supplier will not use chemicals that are considered harmful to the environment and/or people. Suppliers who purchase agricultural products practice and promote the limited use of chemicals and fertilisers in the supply chain and to farmers. They will define and adopt procedures for managing chemicals throughout the supply chain. The Supplier will produce supporting documents related to the management and use of chemicals where requested.

3.2.8 Energy efficiency

The Supplier will take necessary measures to minimise energy consumption and define energy-saving strategies (such as the use of renewable sources and fuels, fuel-efficient logistics activities).

3.2.9 Sustainable packaging

The Supplier will take the necessary measures to minimise the environmental impact of packaging. Suppliers will consistently apply the principles of eco-design: removal of unnecessary packaging, selection of recycled materials whenever possible, reduction of the amount of materials - particularly if from non-renewable sources - and shall encourage the reuse or recycling of packaging.

In addition, the Supplier shall specifically uphold and comply with the provisions of the Zignago Vetro Group's "Green Procurement Policy."

3.3 Other Supplier Rules of Conduct. This covers:

3.3.1 Minerals from conflict areas

Suppliers shall ensure that the products supplied to the Zignago Vetro Group do not contain materials coming from conflict areas whose proceeds directly or indirectly finance or benefit armed groups.

3.3.2 Integrity and Anti-Corruption

Suppliers shall not engage in or tolerate bribery, extortion, influence peddling or embezzlement of any kind. Suppliers agree not to offer or accept bribes or other illegal inducements to their business partners. Suppliers are required not to offer Zignago Vetro Group employees gifts or other personal benefits, unless the gift is of insignificant value, that are a direct result of their relationship with the suppliers.

3.3.3 Fair business practices and information protection

Suppliers are expected to conduct their business in line with the principles of fair competition and in compliance with all applicable antitrust laws.

Suppliers must also: conduct all business dealings in a transparent manner; maintain accounting records in accordance with local regulations; not engage in or permit any form of money laundering; treat all technical, financial and commercial information concerning Zignago Vetro Group and its business partners as confidential; and not use, in an improper manner, confidential and inside information they possess concerning the Zignago Vetro Group.

3.3.4 Traceability and data management

The Supplier will actively involve its supply chain in order to increase its transparency and traceability. It shall track the origin of its goods, keep key documents, and report and manage information according to the agreed database.

3.3.5 Management systems

The Supplier will take the necessary steps to have appropriate management systems in place, including objectives, policies and procedures. Suppliers will offer training to workers and/or employees, ensuring that all points of this Supplier Code of Conduct are included in it and discussed in a consistent manner. The Supplier shall provide proof demonstrating the implementation of each of the key points where required.

In addition, the Supplier shall specifically uphold and comply with the provisions of the "Conflict Mineral Policy," the "Supplier Diversity Policy," and the "ESG Policy" of the Zignago Vetro Group.

4. Acceptance of the code

Each Supplier is required to accept this Code.
The signatory to the Acceptance of this Supplier Code of Conduct, on behalf of the Supplier, acknowledges that he/she understands and complies with all applicable laws and the provisions herein. Suppliers are required to take all necessary corrective actions to promptly remedy any non-compliance.

5. Application verification and reporting

The Zignago Vetro Group reserves the right to ascertain, with or without notice, the compliance with this *Code of Conduct* by its own personnel or by organisations appointed by it. These controls may include the inspection of the Supplier's facilities and/or interviews with their workers; to this end, Zignago Vetro Group requests the collaboration of its Suppliers during these auditing activities.

6. Governance

Within the Zignago Vetro Group, the responsibility for the verification and communication of the principles contained in this *Code of Conduct* 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 document 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.