

ZVG HUMAN RIGHTS POLICY

CONTENTS

1. Zignago Vetro Group - Introduction	2
2. Objective, reference documents and addressees	2
3. Scope of application	3
3.1 Workplace.....	3
3.2 Health and safety.....	3
3.3 Equal opportunities and non-discrimination.....	3
3.4 Local communities	3
3.5 Privacy	3
4. Governance.....	3
5. 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 Zignago Vetro Group has established a Human Rights Policy out of the conviction of its need and responsibility to promote observance of fundamental human rights in all possible ways. ZVG 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. OBJECTIVE, REFERENCE DOCUMENTS AND ADDRESSEES

The objective of ZVG's Human Rights Policy is to publicly state its desire to respect and defend human rights, while also integrating such principles into its activity and all company relations.

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.

Specifically, in drafting the Policy, ZVG referred to:

- the *Universal Declaration of Human Rights*, United Nations, December 10, 1948;
- the *European Convention of Human Rights*, Council of Europe, 1950;
- the Declaration of the International Labour Organisation, June 18, 1998;
- the United Nations Convention against Corruption, 2003;
- the United Nations Convention on the Rights of the Child, 1989;
- the *United Nations Global Compact*;
- *The Italian Constitution*;
- *The International Covenant on Civil and Political Rights*, 1966.

The ZVG Human Rights Policy covers all employees, customers, suppliers, sub-suppliers and all stakeholders.

3. 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.

ZVG 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, we have identified the main human rights that may be directly or indirectly influenced:

3.1 Workplace

In particular, ZVG, 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).

3.2 Health and safety

The rights to health and safety must be assured and promoted for all individuals generally, as well as in the workplace. ZVG 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.

3.3 Equal opportunities and non-discrimination

In terms of religion, age, gender, sexual orientation, gender identity, origin, race, language, disability, political opinion and social condition.

3.4 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.

3.5 Privacy

ZVG considers the right to privacy to be a fundamental human right, as enshrined in the *International Covenant on Civil and Political Rights*.

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 Human Resources function.

5. 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.

Fossalta di Portogruaro, October 13, 2021