

# ZVG SUPPLIER CODE OF CONDUCT

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Review	Approval date: in the ESG Committee	Changes made
0	14/10/2019	First edition
1	13/10/2021	Added Governance and Review sections

## 1. MISSION AND VALUES

The mission of the Zignago Vetro Group (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.

ZVG's founding and shared **values** are as follows:

- 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. SCOPE AND APPLICATION

The Zignago Vetro Group is interested in collaborating with business partners who show the same commitment to the values outlined above and more generally to Corporate Social Responsibility.

This *Supplier Code of Conduct* was created to support the fulfilment of that commitment, and compliance with it is an important component of supplier selection and assessment.

It is applied and extended to its suppliers by all the companies of the Zignago Vetro Group: *Zignago Vetro SpA, Zignago Vetro Brosse SaS, Zignago Vetro Polska SA and Zignago Glass Usa Inc.*

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.

## 3. PRINCIPLES

### 3.1 Compliance with the provisions of law and this code

Our 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. We also expect Suppliers to take appropriate steps to ensure that their Suppliers, and more broadly those across the value chain, comply with the same principles.

### 3.2 Child labour

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.

### **3.3 Working hours**

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.

### **3.4 Working conditions**

There shall be no slavery, servitude, forced and/or compulsory labour, human trafficking, or forced prisoner labour in the supply chain.

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.).

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

### **3.5 Fair wages and earnings**

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.

### **3.6 Diversity and integration**

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.

### **3.7 Freedom of association**

Employees should be free to join organisations of their choice, such as trade unions. Suppliers are committed to having an open and constructive dialogue with their employees and trade union representatives. Where local laws and practices restrict the right to freedom of association and collective bargaining, the Supplier shall endeavour to develop other ways to have meaningful social dialogue with employee representatives.

### **3.8 Health and safety**

A safe, sanitary, and conducive to good health work environment must be provided by providing tools, equipment, and training appropriate to the work undertaken. 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.

At a minimum, adequate drinking water, lighting, temperature, and sanitation shall be provided in the workplace.

### 3.9 Environmental management

Climate change is one of the biggest threats to society and we are cognisant of the need to work together with our suppliers to reduce our impact on the environment.

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 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.

### 3.10 Minerals from conflict areas

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

### 3.11 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.

### 3.12 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.

Our 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 confidential and inside information they possess concerning Zignago Vetro Group in an improper manner.

## 4. GOVERNANCE

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

## 5. APPLICATION VERIFICATION AND REPORTING

The Zignago Vetro Group reserves the right to ascertain, with or without notice, the compliance with this *Suppliers 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. 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.

## 7. ACCEPTANCE OF THE 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.

**Supplier Company Name:**

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**Name and function of supplier representative:**

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**Date:** .....

**Signature:**.....