

ZVG WHISTLEBLOWER POLICY

CONTENTS

1. Zignago Vetro Group - Introduction	2
2. Whistleblowing description and sources	2
3. Scope of application	3
4. Relationship between the Code of Ethics and the Whistleblower Policy	3
5. Reporting, confidentiality, and prohibition of retaliation	3
6. Governance.....	4
7. 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

Zignago Vetro, with registered office in Fossalta di Portogruaro (VE), is the parent of a Group (hereafter also ZVG or the Group) which is an Italian and European leader in the production and sale of hollow 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.

Through this **Whistleblower Policy**, Zignago Vetro and the Group Companies, in line with international Best Practices, undertake to encourage and protect employees who disclose any cases of fraudulent behaviour discovered in the course of their work and professional activities.

The Group, committing with its stakeholders to the highest integrity and fairness in business management, intends to cultivate a corporate culture in which all employees are able to report serious negligence or fraudulent behaviour without fear of repercussions.

ZVG is keenly aware that employees who make correct use of the Whistleblowing procedure help the Group to better protect and manage its reputational risks and to preserve its long-term value.

2. WHISTLEBLOWING DESCRIPTION AND SOURCES

Whistleblowing may be defined as a procedure by which the top management of a private or public company "invites" employees, customers or suppliers who detect fraudulent behaviour to report, under "protection and confidentiality", such behaviour.

The underlying rationale for a Whistleblowing Policy is the common interest. Through the legislature, both the Company and all its stakeholders including shareholders, managers and employees, are aware that a prompt and timely curtailment of any inappropriate behaviour contributes to preserving a company's reputation and its long-term value.

ZVG shares this view, convinced that the value of exposing fraudulent behaviour far outweighs any temporary inconvenience that doing so may cause.

The Parent Company, Zignago Vetro S.p.A., is listed on the STAR segment of the Italian Stock Exchange. The primary sources for Zignago Vetro's Whistleblower Policy are:

- Law No. 190/2012 and Law No.179/2017;
- Self-Governance Code of Borsa Italiana, Article 7;
- Legislative Decree No. 231 of June 8, 2021;
- Dodd-Frank Wall Street Reform and Consumer Protection Act;
- Zignago Vetro, Code of Ethics;
- European Directive 2019/1937;

3. SCOPE OF APPLICATION

Regardless of the above-stated regulatory sources, this Policy also applies to all other Group Companies and specifically to: *ZignagoVetro SpA, Zignago Vetro Brosse SaS, Zignago Vetro Polska SA and Zignago Glass Usa Inc.* regardless of the fact that some regulatory references under Italian law are not formally relevant for each of these companies.

Therefore, each of the above companies 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.

The Group's Whistleblower Policy is addressed to all its corporate functions, employees and business partners.

Certain business functions may be at greater risk, given the statistics of possible fraudulent behaviour in the corporate environment.

ZVG is aware of the high "sensitivity" of certain functions and maintains an efficient system of internal and external controls.

In particular, the Group places great emphasis on:

- **Financial Reporting.** An effective internal control system and the proven independence of the auditor are intended to prevent any risks;
- **Prevention of fraudulent activities such as theft and kickbacks;**
- **Blatant violations of the Code of Ethics and the Code of Conduct, the 231 Model and similar management and control models in force in the countries where the Group operates.**

ZVG is aware that, in order to reduce risks including reputational risks connected to any unlawful conduct, it must guarantee the correct and efficient functioning of the *Whistleblowing* procedure.

It is therefore correct to thank and protect any employee who may report one or more of the irregularities listed above.

The basic premise of this Policy, however, is that any reports should be made in good faith. In this case, ZVG will not take any disciplinary action against the employee, even if such reports do not identify actual irregularities.

Conversely, if the accusations are made maliciously or for personal gain, ZVG may reserve the right to take disciplinary action.

4. RELATIONSHIP BETWEEN THE CODE OF ETHICS AND THE WHISTLEBLOWER POLICY

ZVG's Code of Ethics describes how to proceed in the event of a violation of the Code.

A clear violation of the Code of Ethics, in multiple cases, falls under the Whistleblower Policy.

Updates and revisions of the Code of Ethics are defined and approved by the Board of Directors.

By contrast, any updates and revisions of this Policy are defined and approved by ZVG's ESG Committee.

5. REPORTING, CONFIDENTIALITY, AND PROHIBITION OF RETALIATION

Any report of fraudulent behaviour may be made anonymously or, preferably, in person.

In order for allegations to be deemed more credible, they must be supported by evidence.

The body responsible for receiving any reports is **the Supervisory Board or another body, where designated**, according to the type of offence. This body, after assessing the relevance and size of the alleged violation, may decide to interview any of the parties involved or to consult ZVG top management through the Chairperson.

Reports to the Supervisory Board or the designated body, depending on the type of offence, must be made via the following link:

<https://zignagovetro.segnalazioni.net>

In the event of a report, ZVG will immediately initiate an investigation.

Simultaneously, appropriate protections for the reporting individual(s), including protection of their identity, shall be provided.

The Group will not tolerate any type of retaliation, unlawful conditioning, inconvenience or discrimination against the author of a good faith report or any attempt to reveal his or her identity.

All forms of retaliation against those who have reported possible violations of the Code in good faith also constitute violations of the Code of Ethics.

6. 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.

7. REVIEW

This Policy is subject to a review mechanism that provides for its updating on each occasion that there is a significant change in its contents, in particular those required by applicable law, 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