

***CODE OF
ETHICS***

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DEFINITIONS AND REFERENCES

1 INTRODUCTION

1.1 Introduction

Zignago Vetro S.p.A. (hereinafter also the “Company”) is a company under Italian law listed on the Italian stock exchange. Its main activity is the production and marketing of high-quality hollow glass containers prevalently for the Food and Beverage, Cosmetics and Perfumery sectors. It heads a group of companies that also produce high quality glass containers for the Food and Beverage, Cosmetics and Perfumery - including luxury perfume - industries, along with Speciality Glass bottles for wines and spirits, for the domestic and international markets. The Group is also engaged in other sectors offering synergies with its core business - particularly the collection and treatment of glass cullet for subsequent reuse and the construction of moulds for container production.

This Code of Ethics has been drafted in line with best practices and with the provisions of the reference regulations and, independently of the aforementioned regulatory sources, it has been adopted by Zignago Vetro S.p.A. and by the other subsidiaries, i.e. Zignago Vetro France Sas, Zignago Vetro Polska Sa, Italian Glass Moulds Srl, Vetro Revet Srl and Zignago Glass Usa Inc. (hereinafter also collectively the “Group” or “Zignago Vetro Group” or “Zignago Vetro”). As such, it assumes the function of a Group Code of Ethics.

Zignago Vetro adopts this Code of Ethics in order to clearly define the inspirational and conduct principles that underpin Group management and the value creation process (for shareholders, for employees, and for the community in general). This value creation must be implemented in a long-term and sustainable manner through fair relationships with all partners and with respect for the dignity of all people who, through their work, contribute to the Group’s success.

This document also sets out to describe the set of values that Zignago Vetro acknowledges and shares and which it believes are fundamental in conducting the Company’s business and activities. It also constitutes an integral part of the organisational, management and control model, pursuant to Article 6 of Legislative Decree No. 231/2001 of Italian legislation regarding the administrative responsibilities of legal entities (hereinafter the “231 Model”).

This Code of Ethics also incorporates the principles inspired by the Group’s ESG Policy, approved in March 2021, in addition to those deriving from Zignago Vetro’s membership of the Global Compact, which it joined in April 2021.

The Code of Ethics will be continuously updated and revised, including through contributions received from stakeholders, employees and third parties, in line with regulatory modifications and the most widely accepted international practices, and as a result of the experience acquired in applying the Code itself.

Any amendments to the Code of Ethics shall be disclosed by publishing the updated version on Zignago Vetro’s website and shall in any case be made available to the public in the manner deemed most appropriate.

Compliance with this document is considered an essential condition in the proper functioning of the Company and the Group, safeguarding reliability, reputation and image and increasing customer satisfaction, all of which are factors that contribute to the Group’s current and future success and development.

The Code of Ethics binds the company boards, management, personnel, outside collaborators, commercial partners, suppliers and all those with relationships with the Group.

All employees and anyone operating within Group Companies must be familiar with the Code of Ethics, contributing to its observance to the extent within their remit.

To the extent of its competence, the Group therefore undertakes to guarantee the widest possible dissemination of the Code of Ethics, ensuring an adequate programme of information, training and awareness of its contents.

Companies must ensure compliance with the rules of conduct set out in this Code of Ethics.

1.2 Company Identity

The corporate identity stems from the Mission, Vision and Values upon which Zignago Vetro Group's operations are centred.

Mission

Zignago Vetro's mission is to give a future to glass-making traditions, create innovative and sustainable products that enhance people's daily lives, and nurture local communities and the environment.

Vision

Zignago Vetro's vision is to give shape to ideas and substance to creativity.

The Group companies are able to create original and innovative products, conveying specific values and engaging its audience.

A crucial part of this vision is the combination of technology and tradition for sustainable and flexible production. This means guaranteeing elevated levels of customer service, working with them to realise their plans-

Values

Zignago Vetro's founding and shared values are:

- Sustainability;
- Innovation and creativity;
- Passion and ethics;
- Quality and reliability;
- Flexibility and efficiency;
- Safety and transparency;
- Identity and a sense of belonging;

1.3 Addressees

the rules of this Code of Ethics apply to:

- company boards;
- employees;
- external workers;
- commercial partners (customers, suppliers, etc.) and
- anyone that maintains relations with the Company, wherever they operate.

Zignago Vetro's duty is to spread the Code of Ethics as widely as possible, ensuring that all addressees know and respect the values and provisions contained therein.

The corporate bodies, directors and management bear primary responsibility for giving concrete form to the values and principles contained in this Code, for taking on the consequent responsibilities of Zignago Vetro both internally and externally, and for ensuring that the Group companies' conduct, decisions and business activities are constantly inspired by compliance with the Code.

1.4 Ethical principles

The ethical principles that guide Zignago Vetro are:

- the legality of its actions, understood both as compliance with the laws and regulations in force in all

the countries in which the Group Companies operate, and as observance of the strictest rules of conduct, particularly in relations with the public sector;

- fairness, loyalty and transparency in the conduct of company operations and in the individual conduct of each Addressee, understood specifically as prevention of any form of misconduct, bribery or attempted bribery, in any sphere of the Company's activities;
- diligent performance of activities, understood as care and precision in carrying out tasks, but also as the pursuit of continuous improvement and the ability to ensure a healthy and wholesome product made to the highest possible standards;
- respect for the value of each person, with a particular focus on the physical and moral integrity of staff. The company guarantees working conditions that respect individual dignity and safe, clean workplaces that prevent incidents and damage to health. The use of child labour in all its forms is strictly prohibited. Zignago Vetro undertakes to guarantee the right to fair pay, the freedom to join or form trade unions, and respect for collective bargaining. The company ensures respect for working hours, regular payment of overtime and holiday entitlement for all workers, in line with international regulations and standards.
- Authority must be exercised fairly, avoiding any kind of discrimination (based on race, social class, origin, religion, ethnicity, disability, gender, sexual orientation, trade union membership, political affiliation, age, etc.). Recruitment, work organisation, remuneration, training, promotion, dismissal and retirement must be managed fairly and equitably, avoiding any form of harassment (e.g. bullying, recruitment-related compensation, etc.);
- a commitment to ongoing improvement in matters relating to protection of the environment;
- the application of governance rules that ensure the transparency and integrity of company management;
- a focus on all those who interact with the Company in various capacities.

The aforementioned Ethical Principles must inspire anyone appointed by or in any case involved in the pursuit of Zignago Vetro's corporate objectives.

2. PRINCIPLES OF APPLICATION AND CONDUCT

2.1 Compliance with Legal Provisions

Zignago Vetro bases its operations on the fundamental principle of respect for the Laws and Regulations in force in all of the countries in which it operates. In no case shall the pursuit of the Group's interests justify or legitimise any form of conduct that is contrary to legal provisions. Zignago Vetro also intends to orientate its behaviour towards the concrete achievement of the United Nations 2030 Agenda's SDGs.

This commitment is also binding for all Addressees of the Code of Ethics. Zignago Vetro shall neither initiate nor pursue any relationship with Addressees who do not intend to adhere to this principle.

2.2 Conduct rules

2.2.1 Organisational management and operations

All of the business decisions and choices that are made on behalf of the Group must reflect its best interests, in accordance with the criteria of propriety, cost-effectiveness, transparency, efficiency and efficacy, with respect for the ethical principles set out above.

2.2.2 Honesty and integrity in relationships

The behaviour, professional conduct and relationships established by Addressees in connection with their activities and professional relations with the Group must be based on the utmost honesty, integrity and transparency.

Zignago Vetro and the Addressees of this document shall also refrain from business or non-business relations with interlocutors of dubious moral or reputational integrity.

No organisational component of the Group may be used, even occasionally and/or through the interposition of third parties, in performing activities or carrying out transactions that may enable or facilitate the commission of organised crime offences (including transnational ones).

2.2.3 Fair and responsible competition

Zignago Vetro believes that a fair, healthy system of competition contributes to best achieving its corporate mission. As such, it scrupulously complies with the applicable competition rules and refrains from engaging in and/or encouraging conduct that may constitute unfair competition. In this regard, Zignago Vetro S.p.A. has adopted an Antitrust Code of Conduct, which reflects its commitment to promoting, adopting and respecting a corporate culture and ethics that respect the rules of competition.

Specifically, Zignago Vetro prohibits all collaborators from participating in agreements which are designed to or which effectively obstruct, restrict or falsify the proper rules of competition. Such agreements include collusion with competitors, abuse of a dominant position, denigration of the reputation or image of its competitors.

The Group also strongly condemns all forms of smuggling and prohibits Addressees from conducting business with persons who do not comply with customs law provisions: it therefore requires all suppliers and collaborators to strictly apply the applicable regulations.

2.2.4 Conflicts of interest

In conducting their activities, members of the company boards, employees and collaborators must rigorously avoid situations, operations and/or transactions that create or may create a conflict of interest, this being understood as the situation in which the subject pursues an interest that is not that of the Company or carries out activities that may, in any case, interfere with their ability to make decisions in the exclusive interest of Zignago Vetro, or personally take advantage of business opportunities connected with them.

All of the business decisions and choices that are made on behalf of Zignago Vetro must reflect its best interests, in accordance with the spirit and the principles set out in this Code.

Specifically, Directors must comply with the obligations of the law. As such, Directors who have, on their own behalf or on behalf of third parties, an interest in a certain transaction that conflicts with that of the Group, must inform the other Directors and/or the competent Control Bodies (Board of Statutory Auditors, Supervisory Board, Supervisory Board, etc.) and must abstain from resolutions relating to the transaction.

No Group employee or collaborator may receive personal advantage for the work they carry out on behalf of the Group; furthermore, s/he must rigorously avoid using, even implicitly, his/her position to influence decisions to his/her advantage or that of relatives, friends or acquaintances for purely personal ends of any nature. Where potential conflicts arise, a superior must be informed or the appropriate company channels (compliance bodies, human resources, whistleblowing platform) must be used to resolve the matter.

No Zignago Vetro employee or collaborator may carry out work for the benefit of competitors, act as a consultant or member of the Board of Directors of competing companies, or provide professional services for the benefit of competitors. No employee may perform other activities during their working hours that do not relate to their organisational duties or responsibilities.

2.2.5 Impartiality

In relations with its stakeholders (such as tenders, litigation, etc.), Zignago Vetro avoids all forms of discrimination on the basis of age, gender, health, race, nationality, political opinion or religious creed. It does not accept influence from outside or within its organisation and ensures impartiality and fairness in complying with the legal or contractual rules and principles set out in this Code of Ethics.

2.2.6 Relations with customers and suppliers

Relationships with customers are conducted with professionalism, integrity, honesty, respect, transparency, correctness and availability, pursuing the objective of fully satisfying their expectations with quality products and services, in compliance with contractual agreements, avoiding the use of any deceptive practices and ensuring that products correspond to the declared information on quality, origin and provenance.

Group companies undertake to respond promptly to customer suggestions and complaints, providing accurate, complete and truthful information.

In accordance with the principles of loyalty, professionalism, transparency and correctness, relationships with suppliers focus on the objective of competitive comparison, searching for the maximum advantage for the Group in terms of quality, price, service and assistance guarantees and integrity. This approach encourages ongoing collaborations and solid, long-lasting relationships of trust, also with a view to achieving the best possible quality and environmental and social sustainability in the respective activities.

Supplier selection and the determination of the conditions for goods and service purchases are carried out on the basis of objective and impartial assessments. These take into account the quality, price and guarantees provided and the existence of legal and subjective requirements relating to the professionalism and integrity of the suppliers themselves, including in the areas of remuneration, social contributions and taxation.

In their relations with their suppliers, Group companies observe the following principles:

- Zignago Vetro neither practices nor approves any form of supplier “reciprocity”: the goods/services that Zignago Vetro seeks are selected and purchased solely on the basis of their value in terms of price and quality;
- any negotiations with current or potential suppliers must relate exclusively to the goods and services being negotiated with those suppliers;
- staff responsible for purchasing goods and services must not be subject to any form of pressure from suppliers to donate materials, products and/or sums of money to charity/solidarity associations or similar organisations.

The assumption of commitments and the management of relations with current and potential suppliers must be carried out in compliance with the Group’s directives and the relevant Supplier Code of Conduct, particularly with regards to managing conflicts of interest and business activities. Furthermore, the Group does not intend to maintain any relationships with suppliers of minerals or other raw materials from conflict zones, and applies a Conflict Minerals policy for this purpose.

Zignago Vetro also provides for the contractual right to adopt any necessary measures (including the termination of the contract) in the event that the supplier’s activities in dealings with the Group violate any legal regulations or those of the Code.

2.2.7 Intellectual and industrial property

Zignago Vetro undertakes to protect its intellectual property, while also seeking to avoid infringing on that of others.

All addressees of this Code are required to help pursue this goal by cooperating in the management of any cases of the infringement of the rights of Zignago Vetro.

2.2.8 Corruption and Illegal Payments

Zignago Vetro is committed to preventing and combatting corrupt practices. It is explicitly prohibited to offer to or receive from anyone (either directly, or through third parties) any gifts or any form of illegal payment, whether in cash or otherwise, that may even be simply interpreted as excessive with regard to normal business practices or courtesies, or which could be interpreted as having the intention of acquiring favourable treatment in the execution of any activity associated with the Group companies.

If an employee or collaborator receives offers and/or requests for gifts or benefits (except for gifts for commercial use or of modest value), s/he must immediately inform his/her superior or contact person.

2.2.9 Money laundering

Zignago Vetro undertakes to conduct its business in full compliance with current regulations on combatting organised crime and money laundering and the provisions issued by the competent authorities. Through this document, it therefore prohibits Addressees from carrying out, in any capacity or in any form whatsoever, operations connected with the laundering of money deriving from illegal activities.

Group companies devote the utmost attention and take all mandatory and in any case reasonably appropriate precautions to ensure that they are not used to channel stolen goods or for money laundering or the use of utilities of illegal origin, adopting specific control procedures for this purpose.

The administration of financial resources, the planning of investments, the purchase of goods and services and the management of cash flow are inspired by the principles of correctness, transparency and traceability.

Before establishing business relationships, members of corporate bodies, employees and collaborators must check - in advance and to the extent reasonably possible - available information (including financial information) on business counterparties, consultants and suppliers; such counterparties are required to strictly observe the laws and internal company procedures in any economic and financial transaction involving them, ensuring full traceability of incoming and outgoing financial flows and full compliance with anti-money laundering laws, where applicable.

2.2.10 Offences of association

Zignago Vetro recognises the priority value of legality and public order, censuring any form of mixing, collusion or closeness with national or transnational criminal associations. Particular attention is therefore paid to the selection of commercial partners and external consultants.

In no case may threats or pressure from such associations justify any attitude of acquiescence or connivance on the part of Group companies or their representatives, who must, on the contrary, promptly report the matter to the competent authorities.

2.3 Human Resources

2.3.1 The strategic value of human resources and professionalism

Zignago Vetro recognises that human resources are central in achieving long-term success and sustainability.

Group companies protect, support and promote the value of the individual and moral integrity, fostering professional growth. They are committed to ensuring equal opportunities at every organisational level, operating on the basis of merit, avoiding discrimination based on age, culture, sexual orientation, gender identity, religious faith, ethnicity, nationality and health. They provide working conditions that respect individual dignity and safe, clean workplaces that respect the applicable regulations and workers' rights.

Zignago Vetro promotes professional relationships based on loyalty, fairness, mutual trust and full respect for individual personality. It invests in continuously improving working conditions and standards, fostering constructive relations with professionals and workers as an essential part of a healthy and results-orientated working environment. In this respect, it encourages the assumption of responsibility and the professional growth of its collaborators, ensuring that relationships between the various hierarchical levels are based on

the same principles described above.

Group companies are also committed to safeguarding the physical and moral integrity of workers, ensuring that they do not suffer unlawful influence or undue hardship. Accordingly, they protect workers from acts of psychological violence and oppose any discriminatory attitude or harm to individuals.

Employees and collaborators are required to commit themselves and act loyally, ensuring that they perform as required and meet their obligations to Group companies. Sexual harassment, intimidation and hostile attitudes are prohibited in work relations, both internally and externally.

Requests or threats designed to induce individuals to act in contravention of the law or the Code of Ethics or to behave in a manner contrary to their moral and personal beliefs are strictly prohibited.

The Group is also committed to ensuring maintenance of the conditions required for the existence of a collaborative, non-hostile working relationship, preventing discriminatory conduct of any kind.

Disparities that may be motivated by objective, justifiable criteria do not constitute discrimination.

Zignago Vetro also promotes dialogue and discussion within the organisation, paying attention to the needs and legitimate expectations of stakeholders. It is committed to fostering solidarity, building positive interpersonal relationships and balancing work and personal needs.

Aware that professionalism is acquired through practice, experience and specific training, Zignago Vetro recognises the crucial contribution of senior professionals and promotes the transfer of their knowledge and professional skills to younger staff through mentoring, continuous education and training programmes.

2.3.2 Safeguarding of Individual Personality

Zignago Vetro repudiates any activity that is detrimental to individual personality, also censuring any form of exploitation or enslavement of human beings. The Group protects and promotes the most fundamental value of the human person, who must not be discriminated against on the basis of age, gender, sexual orientation, race, language, nationality, political or trade union opinions or religious beliefs. It recognises respect for work, for different opinions, regardless of seniority and experience, and the power of ideas as indispensable principles of its philosophy and its operations as an international organisation.

Zignago Vetro requires its suppliers to act in compliance with applicable labour laws, customs and practices and to operate without any form of discrimination on the basis of age, gender, sexual orientation, race, language, nationality, political or trade union opinions, religious beliefs or disability. Group companies also commit not to consciously entertain, whether directly or indirectly, relationships of any kind with parties that violate in any way the regulations on the protection of labour, including child labour, and/or the illegal use of labour deriving from trafficking of people.

2.3.3 Selection of personnel and working relationships

Selection of personnel is carried out in compliance with the principle of equal opportunity, without discrimination based on the private life or opinions of candidates. The recruitment process seeks to identify candidates who match the profiles needed by the company, avoiding favouritism and preferential treatment. Recruitment, selection, hiring and career development are based on objective and meritocratic criteria such as professional experience, academic qualifications, specific skills and achievements. Group companies actively promote the hiring and integration into the workforce of people belonging to protected categories.

Zignago Vetro does not permit extra-contractual working relationships.

Personnel are employed under regular labour contracts; no form of irregular labour or exploitation of child labour is tolerated. They become part of the corporate structure exclusively on the basis of a regular work or collaboration contract. No form of working relationship that is not compliant with, or is otherwise in breach of, applicable regulations is permitted.

In compliance with applicable Laws, the Group companies are committed to avoiding any type of work relationship with parties that do not possess a residency permit and to not conducting any type of activity that may favour the entry or residence of illegal aliens into the national territory.

Employees and Collaborators are prohibited from accepting or soliciting promises or pay-outs of monies or goods or benefits, pressures or services of any type that may be construed as influential in the hiring of an employee or worker or attaining a job transfer or promotion.

2.3.4 Personnel responsibilities

Zignago Vetro personnel must comply with the Code of Ethics, respecting the laws and principles of integrity, fairness, loyalty and good faith. Maintaining a safe and respectful working environment is essential, avoiding any illegal behaviour, abuse, threats or aggression.

Personnel are required to protect the confidentiality of company information, use resources responsibly and avoid conflicts of interest. Staff are required to actively and responsibly participate in training programmes to continuously improve professional skills and ensure compliance with company standards. Staff are encouraged to contribute actively to achieving company objectives by proposing solutions to improve work efficiency. Communication must be clear and transparent, promoting a collaborative and professional working environment.

Employees must promptly report any breach of the Code of Ethics through the appropriate channels, thereby ensuring transparency and accountability within the organisation.

2.3.5 Occupational health, safety and hygiene protection

Group companies activate and adopt all safety measures required by laws and regulations, in addition to those that are further necessary and/or appropriate (mainly in terms of prevention) to preserve the health and safety of personnel and to protect all company resources. They guarantee their employees and collaborators working conditions that respect individual dignity and provide healthy and safe working environments, in compliance with current legislation on accident prevention and workplace health and hygiene.

The Group companies are therefore committed to:

- spreading and consolidating a culture of workplace health and safety, developing awareness of the risks associated with the work activities carried out, promoting responsible behaviour among all employees and requiring everyone, at every level, to behave responsibly and respect the safety system in place and all the company procedures that form an integral part of it;
- to establish safe processes to protect the health of the employees of Group companies and the community surrounding its premises, aligning its operational strategies to the company's health, safety and environmental policy;
- provide institutional training at specific moments in an employee's company life and recurring training intended for operational personnel;
- promote and implement all initiatives to minimise risks and eliminate causes that may jeopardise employees' health and safety, through measures of a technical and organisational nature, including through the introduction of a system for managing risks, safety and the resources to be protected, in addition to preventative measures, to safeguard worker health and wellbeing and protect all company personnel;
- to periodically review and continuously monitor the performance and efficiency of the system set up to guard against safety-related risks, to maintain safe workplaces to protect its personnel, and to achieve its health, safety and environmental targets for continuous improvement.

All employees and collaborators must contribute to the good management of health and safety, always working in compliance with applicable regulations, and must not subject other employees or collaborators to risks that may cause damage to their health or physical well-being.

Zignago Vetro is also committed to providing a healthy working environment that excludes any form of discrimination on the grounds of race, gender, religion, nationality, age, sexual orientation, disability or other personal characteristics that are not related to work.

Zignago Vetro shall ensure that in carrying out its internal and external work relationships, no person shall be subjected to violence, threats, deception, abuse of authority, exploitation of a state of physical or mental inferiority or of a situation of need. The Group does not tolerate any form of bullying against its personnel, nor is any form of harassment and/or insult at work permitted.

2.3.6 Privacy protection, confidentiality and information management

Zignago Vetro protects the confidential nature of the information and data in its possession, operating with full respect for the applicable Laws and Regulations in force, in addition to the principles of transparency and propriety, adopting all appropriate safeguards to this end.

The Company is committed to safeguarding the privacy of the data pertaining to the private lives and opinions of its workers. Such information is acquired, processed and kept through specific procedures designed to ensure that unauthorised individuals cannot gain access to it, together with full compliance with privacy rules. Any investigation into the ideas, preferences, personal tastes or, in general, private lives of the collaborator is not permitted.

Similarly, all Zignago Vetro workers (and collaborators) are required to keep in confidence information to which they gain access in the course of their duties, in accordance with the law, regulations and circumstances, and to keep the data entrusted to them with care. They must also comply with this confidentiality obligation after their working relationship ends. Every employee (and collaborator) must also refrain from using confidential and non-public information of which they have become aware through their office and/or profession for personal purposes or, in any case, for purposes that do not relate to the exercise of their working or professional activity or the activities carried out in the interest of the Group.

No employee (or collaborator) may therefore derive any advantage whatsoever, whether direct or indirect, personal or financial, from the use of confidential information, nor may they communicate this information to others or recommend or induce others to use it.

2.3.7 Protection and use of company assets and resources

Zignago Vetro promotes the protection and the prudent and diligent use of assets, equipment and corporate resources, in compliance with the criteria of fairness, economy, efficiency and effectiveness, in the pursuit of its corporate purpose.

It also promotes the correct use, for any purpose and in any form, of trademarks, distinctive signs and all intellectual works of a creative nature, protecting the author's property and moral rights. In this regard, any conduct that seeks, in general, to counterfeit, alter, duplicate, reproduce or disseminate, in any form whatsoever and without right, the work of others is strictly prohibited.

To protect the company's assets, every employee and collaborator must operate diligently and responsibly, is responsible for protecting the resources entrusted to them, and has the duty to promptly inform their supervisor of any events that are harmful to the Company.

Specifically, every employee and collaborator must:

- carefully and sparingly utilise the company property which is entrusted to them;
- avoid improper use of company property that may give rise to damage or reduced efficiency, or otherwise be contrary to the Company's interests;

avoid the improper use of company property for objectives and purposes that are not a part of his own duties and work, especially if prejudicial to the image and decorum of the Group companies.

2.3.8 Disclosure obligations

All employees are required to provide their direct superiors and any Supervisory Board with all information of which they become aware in the course of their work duties regarding violations of the law, the Code of Ethics and other company rules that may prove detrimental to the Group in any way.

Function heads are required to supervise their employees' activity and inform appointed Supervisory Board

of all possible violations of the above rules.

2.3.9 Gifts and benefits

Employees and collaborators may not request, solicit or even simply accept gifts or other benefits, for themselves or others, in relation to their work or as a contribution to the company's activities, with the exception of those of modest value consistent with standard business practices and courtesy. Likewise, they may not promise or offer gifts or other benefits to anyone from whom they may obtain favourable treatment in the performance of any activity relating to the Company.

Unlawful advantages cannot be granted to customers or to public and private suppliers.

Offers of gifts and advantages not of modest value must be reported to the relevant function heads, who will take the most appropriate action and, where appropriate, inform any appointed company Supervisory Board according to the established procedure.

2.3.10 Integration of universally recognised human rights

The Group complies with the United Nations Guiding Principles on Business and Human Rights (UNGPs), the Organisation for Economic Cooperation and Development Guidelines for Multinational Enterprises (OECD Guidelines), the International Labour Organisation (ILO) Guidelines and the principles of the UN Global Compact. In line with these principles, the Group is committed to:

- avoiding any injuries involving employees or external collaborators operating within the scope of the Company;
- respecting the system of labour standards, regulations, and agreements aimed at ensuring a wage that provides acceptable living conditions for all workers, without discrimination between women and men, in order to achieve decent and productive work, in conditions of freedom, fairness, safety, and dignity;
- guaranteeing the right of workers' associations, collective and individual bargaining, respecting the maximum number of working hours per day, week and month;
- prohibiting child labour in all its forms;
- opposing all forms of discrimination;
- prohibiting corporal punishment and similar disciplinary practices;
- prohibiting forced labour in all its forms;

2.4 Environmental protection

2.4.1 Environmental protection

Zignago Vetro regards the environment as an essential value to be protected. Accordingly, in its activity it guarantees compliance with applicable legislation, while also striving for an increasing degree of compatibility of its business (both ordinary and strategic) with the local community and environment.

In this regard, Zignago Vetro:

- promotes the adoption of activities and processes that are as environmentally friendly as possible, especially through the use of advanced technologies. These focus particularly on environmental protection, energy efficiency, the increasing use of energy from renewable sources and sustainable resource use, eliminating waste, limiting the consumption of natural resources and developing recycling as far as possible;
- promotes the protection and conservation of biodiversity and ecosystems;

- evaluates the environmental impacts of all company activities and processes;
- collaborates with internal and external stakeholders to optimise management of environmental requests and impacts;
- pursues increasingly demanding standards of environmental protection, including through the implementation of appropriate management and monitoring systems, also taking adequate precautions to prevent damage and danger to the environment.

Consequently, all addressees are expected to comply rigorously with the environmental regulations and behavioural criteria outlined above.

2.5 Governance and management rules

2.5.1 Correctness and reliability of financial statements and tax

Zignago Vetro respects the laws and regulations that govern the drafting of annual and interim financial statements, and all types of similar documentation that are required by applicable law, including those relating to tax. Corporate information and data and the accounting records of operating events must ensure transparency, accuracy and completeness and give a true and fair view of the operating activities and equity and financial position.

Every one of the Group companies' actions and transactions must be adequately recorded in the Company's accounting system in accordance with the criteria indicated by the Law and by the applicable accounting standards, and it must be possible to verify *ex post* the process of decision-making, authorisation and performance from the point of view of legality, consistency, relevance and congruity.

All operations, transactions and management decision must have adequate supporting documentation in order to, at any time, carry out verifications that confirm the elements of and reasons for the transaction, the related, accurate accounting record, and which identify, at the various level of responsibility, the parties that authorised, carried out, reported and verified the same transaction.

Accounting records must be kept accurately, completely and promptly in accordance with the Company's accounting procedures, in order to provide a true and fair view of its economic, equity and financial situation and operating activities.

Employees must therefore adhere to the principles of correctness, truthfulness, loyalty, transparency/completeness of the data and information contained therein and professional ethics in the activities of drawing up the financial statements or other similar documents, ensuring the completeness, correctness and clarity of the information provided.

Employees must also refrain from any conduct, whether active or omissive, that directly or indirectly violates the regulatory principles and/or internal procedures relating to the formation of company documents and their external representation.

Accounting records refer to all of the documentation that numerically represents operational activities, including internal notes for expense reimbursements.

The above obligations apply, with the necessary and appropriate adaptations, to the areas concerning tax/customs declarations and fulfilments and, in general, to the relationships with the financial administration, in order to prevent the commission of the tax offences.

Specifically, in compliance with national and international tax, fiscal and customs regulations, the Zignago Group promotes the adoption of all necessary measures to prevent tax offence risks and the related behaviours that might create them.

The addressees of this Code of Ethics undertake to refrain from any conduct, whether active or omissive, that directly or indirectly violates the principles of internal legislation, regulations or procedures, particularly those relating to income tax, value added tax and customs procedures, relating to the regular formation and proper storage of accounting documents.

2.5.2 Proceedings involving the Company

Mandatory claims, communications and filings that pertain to Group companies must be executed by legally recognised parties in a timely manner, truthfully and in compliance with applicable regulations.

It is prohibited to impede or obstruct, through the concealment of documents or other suitable narratives, the execution of control or auditing activities that are legally attributed to the Shareholders, other Corporate Bodies or Auditing Companies (where existing).

It is prohibited to undertake fraudulent or similar activities to obtain the majority vote in a shareholder meeting resolution.

It is prohibited, also through disguised channels, to return conferments made by shareholders or release them from the obligation to execute said conferments, except in the case of a legitimate decrease in the share capital.

It is prohibited to distribute profits or advances on profits that have not actually been recorded or that should be allocated to reserves, or to distribute unavailable reserves.

It is forbidden to carry out reductions in share capital, mergers or demergers that are not in compliance with the legal provisions that safeguard creditors.

It is prohibited to create or falsely increase Group companies' share capital through assignments of shares or quotas for sums inferior to the par value, reciprocal subscriptions to shares or quotas, significant overvaluations of conferment of assets in kind or in credit, or the Company's equity in the event of conversion;

Any and all transactions that may result in deliberate damages to shareholders or creditors are prohibited. It is prohibited to carry out real or simulated operations that may distort the correct dynamics of the supply and demand of financial instruments, as is the performance of operations that may unduly benefit from the dissemination of incorrect information.

2.5.3 Confidentiality obligations

Employees are obliged to ensure the utmost confidentiality with regard to the information they handle as part of their work and to respect the general right to confidentiality regarding the activities carried out by the Group companies and, for employees, the loyalty obligation.

2.5.4 Prohibition of the abuse of inside information

Addressees of the Code of Ethics are required to comply strictly with the laws regarding the abuse of inside or relevant information, in addition to the regulations and procedures that have been adopted by the Group for this purpose.

Specifically, it is expressly prohibited for Addressees to use information that does not belong to public domain or which is acquired in relation to work activities, functions or professions carried out in favour of the Company or the Group in order to negotiate, directly or indirectly, financial instruments or in any case to obtain personal gain, also for third parties.

In determining the moment at which the inside information must be made public and the related methods for such action, Zignago Vetro acts in compliance with the norms and procedures provided for by applicable regulations.

2.5.5 Information Management and External Communications

Zignago Vetro seeks to ensure maximum confidentiality of the information managed by each worker in relation to his or her working function and in respect to the general right to confidentiality.

External communication, in particular to the financial markets, supervisory bodies and the media, must be conducted in compliance with the applicable rules and regulations, through persons specifically appointed to the role responsible for such communication. Communications must not be false or misleading and must be

as timely, correct and clear as possible and guarantee equal access.

It is therefore prohibited to circulate, by any means, even in fulfilment of legally required disclosure obligations, false, biased or misleading information.

It is also forbidden to disseminate “Price Sensitive” information acquired in the course of business activities. Zignago Vetro identifies and indicates the channels, forms and persons in charge of communication from and with third parties and the market.

2.5.6 Relations with the mass media

Relations with communication and information media, along with Zignago Vetro’s marketing and advertising activities, are based on respect for the right to information, the protection of privacy and the laws in force. They must be supervised and handled by expressly authorised individuals, who must verify the requirements before releasing any communications.

All information released must be consistent with the principles of truthfulness, transparency, propriety and prudence, in accordance with this Code of Ethics, internal procedures and protection of the Company’s image.

Persons not expressly authorised to do so may not disclose data and/or information to press and media outlets in the Company and/or the Group’s name without express authorisation from the Company.

2.5.7 IT Security and Use of IT Systems

Zignago Vetro seeks to ensure that the following principles are observed in electronic data management:

- Confidentiality: information is protected against improper access and is used by authorised individuals only;
- Integrity: all company data is effectively as originally entered into the IT system and has only been modified in a legitimate manner.
- Availability: company data can be retrieved as a function of process continuity needs and in accordance with the rules requiring that historical archives be kept.

All employees are required to comply with the provisions in force, the conditions set out in license contracts and the relevant company policies.

Within the framework of their duties, all employees are also required to prevent the possible commission of offences through the use of IT systems.

2.6 External, community and stakeholder relations

2.6.1 Relations with the community

Zignago Vetro adopts and promotes socially responsible behaviour, and seeks to become a point of reference for the community and the territory where it operates, contributing to socio-economic growth and maintaining relationships with local organisations that are inspired by active collaboration.

2.6.2 Public sector and institutional relations

Relationships with the Public Sector and Institutions, whether national or foreign, must take place with full respect for Laws and Regulations, according to the principles of correctness, transparency and loyalty, with respect for applicable standards, with full collaboration and without inappropriately influencing counterparty decisions in any way for the purpose of obtaining favourable treatment. These relationships must be maintained only by persons authorised to do so by the current delegated and proxy powers conferred by each Group company’s administrative body.

It is not permitted to give or offer - directly or through third parties - money and/or gifts (except those of

modest value, and in any event such as to avoid jeopardising the integrity or reputation of one of the parties and/or being interpreted as intended to secure improper advantages) or benefits of any kind of size, or to engage in relationships of consultancy, sponsorship, advertising or personal appointments with executives, officials and employees of the public sector or their relatives.

This rule relates to both gifts promised or offered and those received, where “gift” is understood as any type of benefit, and also applies to any entities or persons (e.g. consultants) and their employees and/or collaborators, engaged by Group companies, even only occasionally, in their relations with the public sector.

The following are prohibited in relations with public institutions and the public sector: promising or granting cash payments for non-institutional purposes; promising or granting favouritism in the hiring of personnel, the selection of suppliers of goods and services and the communication of information and documents; producing false and/or altered documents and/or data or omitting necessary information, including to obtain grants, subsidies, financing or other disbursements from the central government, public entities or the European Community; using government grants, subsidies or financing for purposes other than those for which they have been obtained; and engaging in authorised access to the IT systems of the public administration to obtain and/or modify information for the entity’s benefit.

Zignago Vetro undertakes to scrupulously observe the Public Supervisory Authorities’ rules on compliance with the regulations in force in the sectors relating to its business.

Addressees undertake to comply with any request made by the Independent Administrative Authorities in the exercise of their functions and to co-operate fully during investigative procedures.

2.6.3 Conduct criteria in relations with political and trade union organisations

Zignago Vetro seeks to make a concrete contribution to the economic well-being and growth of the communities in which it operates. It therefore conducts its activities with respect for local and national communities.

Zignago Vetro promotes and supports social, sporting, humanitarian and cultural initiatives, potentially also making grants to foundations, institutions, organisations or entities that carry out social and cultural activities and, more generally, those that seek to improve living conditions and spread a culture of peace and solidarity. The process of disbursing these contributions must comply with the applicable regulations and be properly and adequately documented.

Zignago Vetro does not promote or maintain any kind of relationship with organisations, associations or movements that pursue, directly or indirectly, criminal purposes or, in any case, those that are prohibited by law.

Zignago Vetro also condemns any form of participation by Addressees in associations whose purposes are prohibited by law or inimical to public order. It also repudiates any conduct that seeks even simply to facilitate the activity or plans of organisations which aid the commission of crimes, even where this facilitation is necessary to obtain a benefit.

Zignago Vetro conducts its relations with political parties or their representatives or candidates and with representatives of local administrations in strict compliance with applicable legislation and company directives, with the utmost respect for legality and transparency, integrity and impartiality, in order to establish proper dialogue.

Group companies refrain from any direct or indirect pressure on political figures and do not make contributions and/or grants to organisations with which there may be conflicting interests or to associations that carry out activities or play important roles in determining national and international policy.

2.6.4 Protection of Image

Zignago Vetro strives to ensure that the principles set out in the Code of Ethics are respected, thereby protecting its image and good reputation.

2.6.5 Protection of Public Safety

Zignago Vetro is actively committed, also by means of the prevention and control activities carried out by the appointed Supervisory Body, where appropriate also in collaboration with the competent national authorities, to the application of the provisions of the International Convention for the Suppression of the Financing of Terrorism.

2.6.6 Protecting cultural and natural heritage

In conducting its business activities, Zignago Vetro is committed to protecting historical, artistic, cultural and natural heritage. It therefore refrains from carrying out activities that may violate the regulations governing heritage of cultural or natural relevance and/or interest.

3. DISCIPLINARY SYSTEM

The principles expressed in this Code of Ethics are an integral part of the conditions governing employment relationships within the Group. Any violations of the Code of Ethics will entail the application of sanctions against Group companies' employees, directors and members of control bodies, also in accordance with the disciplinary system provided for by Zignago Vetro S.p.A.'s 231/01 Model and the specific regulations of the countries in which the Group companies operate.

For Collaborators, Consultants and Suppliers, failure to comply with the precepts contained in this Code may result in termination of the contract.

Any violation of the principles and provisions contained in this Code of Ethics by the Recipients must be immediately reported to their hierarchical superior, who shall promptly inform the Board tasked with supervisory duties.

The procedure for the application and imposition of disciplinary sanctions is defined by internal regulations in line with the applicable body of laws/regulations in the field of employment.

4. CONTROLS

Where established, the **Company's Supervisory Board (SB)**, which is empowered with autonomous powers of initiative, control and may apply disciplinary measures, enforces the observation of and compliance with the present Code, based on its own internal regulations and in the framework of what has been specifically provided for in the Organisation, Management and Control Model as per Legislative Decree No. 231/01.

The Supervisory Board is subject to the laws and the same principles as this Code; it operates with impartiality, authority, autonomy, continuity and professionalism.

By way of non-exhaustive simplification, the Board's institutional activities are:

- verifying the dissemination of the Code of Ethics and the training and information provided to Addressees;
- managing, further studying and verifying the principles and rules set out in the Code, in addition to updating and adapting those principles and rules;
- interpreting the Code, constituting a point of reference to resolve any conflict or doubt on the application of the principles expressed therein;
- verifying addressee and third party compliance with the Code of Ethics and the Model;
- updating the Code of Ethics and the Model;
- safeguarding, assisting and protecting employees who report conduct that does not comply with the Code, protecting them from pressure, interference, intimidation and retaliation;
- reporting any breaches of the law and/or of the provisions of this Code to the competent corporate functions, in the manner set out below;
- verifying the correct and timely application of the disciplinary sanctions provided for violators of the Code of Ethics or of the Model.

To achieve its purposes, the Supervisory Board is free to access all of Zignago Vetro's information sources and has the power to view documents and consult data; it carries out periodic checks on the operation of and compliance with the Model adopted; it verifies the destination and effective allocation of financial transactions to and from Zignago Vetro; it is assigned adequate human and material resources to enable it to operate rapidly and efficiently.

The Supervisory Board operates with broad discretion and with the full support of Zignago Vetro's top management, with which it co-operates with full independence.

The Addressees must co-operate with the Supervisory Board, where established, providing the information requested from them and reporting any violations of this Code or of the Model they may detect. Failure to co-operate constitutes an independent violation of this Code and the Model and is punishable as such.

Details regarding the appointment, revocation, powers, duties and functions of the Supervisory Board are contained in the provisions of the Model (of which this Code is an integral part).

Zignago Vetro has also set up a reporting system (Whistleblowing), which can be used anonymously. This channel may be used to report any violation of this Code to the Whistleblowing Management Committee (WMC), appointed by the respective Boards of Directors of the Group companies. The Committee comprises an independent member of the Zignago Vetro S.p.A. Board of Directors, drawn from minority shareholders, and a member of the Zignago Vetro S.p.A. Board of Statutory Auditors, drawn from minority shareholders, thereby guaranteeing impartiality.

5. EFFICACY OF THE CODE OF ETHICS AND CONSEQUENCES OF VIOLATIONS

5.1 Compliance with the Code of Ethics

Compliance with the Code of Ethics must be regarded as an essential aspect of the contractual obligations of employees. It must also be considered an essential aspect of the contractual obligations assumed by independent contractors and/or those with business relationships with the Group companies.

5.2 Reporting violations

To ensure that the Code of Ethics is effectively applied, Zignago Vetro requests all those becoming aware of any cases of non-compliance with and/or violation of this Code of Ethics at Group companies, of alleged violations of it or of conduct that does not comply with the rules of application and conduct, to make a Report.

Reports may be made:

A. in written form:

- by regular post; or
- by digital means, using the messaging systems accessed directly through the specific platform available on the home page of the Company's website www.zignagovetro.com, using the following link: <https://zignagovetro.segnalazioni.net>. This channel guarantees anonymity, where the reporter chooses it.

B. orally:

- through a direct meeting with the Whistleblowing Management Committee; or
- using the voice messaging system available on the IT platform dedicated to whistleblowing reports.

The aforementioned platform is the priority channel for Zignago Vetro Group companies.

Any reports of violations of the Code of Ethics must be sent and managed in accordance with the procedure

“Management of Reports (Whistleblowing Channel)”, to which reference should be made.

The Whistleblowing Procedure Committee (WPC) is required to proceed promptly with the thorough, careful review of reports and, after determining that a report is justified, submit the case to the competent company function for the application of any disciplinary penalties or the activation of contractual termination mechanisms. The WPC may summon and interview the person who submitted the report and any other individuals involved, in addition to possibly consulting the Company’s top management (Chief Executive Officer, if not involved).

Whistleblowing platform reports may also be made by persons outside the Group.

Zignago Vetro guarantees that no one will face retaliation, unlawful pressure, hardship or discrimination in the workplace for having reported an actual or attempted violation of the provisions of the Code of Ethics or internal procedures.

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. In addition, deliberate wrongful accusation of other employees of a violation is also to be considered a violation of the Code of Ethics.

5.3 Sanctions

Violation of the principles laid down in the Code of Ethics and company procedures jeopardises the bond of trust between Zignago Vetro and those who commit such violations (whether Directors, Employees, Consultants, Associates of various kinds, Customers, Suppliers or Commercial and financial partners).

Once it has been determined that a violation has been committed, the violation will be promptly and immediately pursued through incisive action involving the adoption, in accordance with applicable legislation, of adequate, proportional disciplinary measures, independently of any criminal liability arising from such conduct and the commencement of criminal proceedings where the conduct constitutes a criminal offence.

Violation of the rules and provisions contained in the Code of Ethics constitutes a breach of the obligations deriving from the employment or collaboration relationship and entails all the related legal or contractual consequences.

In the most cases judged to be most serious, the violation may lead to termination of employment, if carried out by an employee, or to termination of the relationship, if carried out by a third party.

Disciplinary measures for violations of the Code of Ethics are adopted by Zignago Vetro in accordance with applicable laws and the relevant national or company labour contracts.

To protect its image and preserve its resources, Zignago Vetro must refrain from relations of any kind with parties that do not intend to act in strict accordance with applicable legislation and/or who refuse to act in compliance with the values and principles set out in the Code of Ethics.

5.4 Circulation of the Code of Ethics

This Code of Ethics has been approved by the Board of Directors of Zignago Vetro S.p.A. and by those of all the other Group companies. It is circulated to the Group companies’ boards, employees, consultants and independent contractors, and to any other third parties who may act on their behalf. All the above persons are required to familiarise themselves and comply with the provisions of the Code.

The Code of Ethics is also published in a position of adequate visibility on Zignago Vetro’s website.

A hard copy is made available to all employees and collaborators and may be requested from the Group’s Corporate and Company Affairs Director and Investor Relator or the Group’s Director of Human Resources.

Updates and revisions of the Code of Ethics are defined and approved by Zignago Vetro’s Board of Directors, which will ensure that the same is done by the other Group companies.

In order to ensure a proper understanding of the Code of Ethics, an information plan is drawn up that ensures full circulation and illustration.

DEFINITIONS AND REFERENCES

- Legislative Decree No. 231 of June 8, 2001 of the Italian legal system and subsequent updates;
- Confindustria Guidelines of the Italian legal system for the drafting of the Organisational Model as per Legislative Decree No. 231 / 2001;
- United Nations Guiding Principles on Business and Human Rights (UNGPs);
- Organisation for Economic Cooperation and Development's Guidelines for Multinational Enterprises (OECD Guidelines);
- United Nations Global Compact;
- Universal Declaration Human Rights;
- ILO Conventions;
- United Nations Sustainable Developments Goals;

Fossalta di Portogruaro, April 29, 2024