

HUMAN RIGHTS POLICY AND ON ETHICAL – SOCIAL ASPECTS

Guala Closures Group aims at maintaining and strengthening its market leadership in the production of closures (for spirits, wine, water and other non-alcoholic beverages, olive oil and condiments) while committing to sustainable development in full compliance with ethical and social requirements, product quality and food safety requirements, occupational health and safety and environmental protection.

We are committed to meeting the highest ethical standards, maintaining and improving policies and processes to avoid any potential complicity in human rights violations relating to our direct and indirect activities (supply chain).

Our commitment to human rights guarantees respect for the rights of each individual, namely:

- Respect for civil rights:** Guala Closures Group recognizes each person's freedom of thought, personal freedom, freedom of assembly, religion and economic freedom and to act as long as it does not violate the civil rights of other individuals.
- Respect for political rights:** Guala Closures Group recognizes everyone's freedom of association in parties and trade union representatives; it also guarantees electoral rights.
- Respect for social rights:** Guala Closures Group recognizes the right of every person to work, to assistance, to study, to protect health.

The principles on which Guala Closures Group bases its **policy on human rights and ethical-social aspects** are:

- Refusal of child labour.
- Refusal of forced labour.
- Freedom of association and collective bargaining for workers.
- Fair and favourable working conditions for all workers.
- Health and safety in the workplace.
- Recognition of the rights of local communities.
- Equal opportunities for all workers and no to discrimination and harassment.
- Recognition of diversity and inclusion.
- Respect for human rights in the supply chain.

In detail, our commitment to human rights, also outlined in our "Code of Ethics and Conduct", the "Modern Slavery and Human Trafficking Policy" ensures the following:

Child labour: Guala Closures Group rejects the use of any form of child labor and of people younger than the minimum age established by law and regulations in force in the countries in which the Group operates.

Forced labour: Guala Closures Group rejects the use of forced, forced or compulsory labor and guarantees working conditions that comply with the laws and regulations in force in the countries in which the Group operates. The performance of work, both ordinary and extraordinary, is the free expression of the will of the workers and is free from any form of physical or psychological coercion.

Freedom of association and collective bargaining:

Guala Closures Group recognizes its employees' right of association, as protection and defence of their interests, and the right to be represented by trade union bodies or other forms of representation, according to the law and regulations in force in the countries in which the Group operates.

Guala Closures Group guarantees that employee representatives are not penalized in any way or subjected to any form of retaliation.

Collective bargaining, according to the national employment contract applicable in the countries in which the Group operates, is recognized as a privileged instrument both for determining the contractual rules and conditions of its employees, and for regulating relations between the Company and the organizations union.

Fair and favorable working conditions:

Guala Closures Group believes that working conditions, working hours and wages must guarantee an adequate standard of living for all workers; therefore, Guala Closures Group promotes a working condition in which all employees receive fair and equitable compensation according to the type of work performed, the contractual framework and the country in which they are employed.

Furthermore, in all Guala Closures plants, the minimum salary of employees is not lower than that established by collective agreements and by the regulations in force in the countries in which each plant is located and working hours also comply with the conditions established by local collective agreements.

Health and safety in the workplace:

As a primary and fundamental principle, Guala Closures Group is aware of the right of each worker to operate in environments and conditions suitable for ensuring the health and safety of workers; in this regard, it guarantees compliance with the laws and regulations on occupational health and safety in force in the countries in which the Group operates.

That said, we are committed to guaranteeing healthy and safe working conditions and to promoting the dissemination and consolidation of a culture of safety among all workers (direct and indirect), also within the supply chain.

Rights of local communities:

Guala Closures Group undertakes to respect the rights of local communities in the countries where the Group operates and to reduce the social and environmental impact of the activities carried out at the production sites.

Through the search and hiring (where possible) of local personnel, we contribute to the social and economic growth of local communities.

We undertake not to engage in activities that exploit or discriminate against external communities.

We are committed to implementing behaviors that are respectful of local contexts and territories, also with the aim of creating value and opportunities for growth and development.

Equal opportunities and no to discrimination and harassment:

Guala Closures Group rejects any form of discrimination based on ethnicity, skin colour, gender, age, disability, sexual orientation, religion, political opinions, union orientation and membership, nationality and social origin.

Furthermore, we are committed to:

- maintain a work environment free from any form of violence or harassment,
- comply with the laws and regulations on equal opportunities in force in the countries in which the Group operates,
- foster the commitment of all workers to act with respect and integrity in all relationships with colleagues, customers, suppliers and other parties with whom they interact.

Diversity and Inclusion:

Guala Closures Group believes that diversity and inclusion are a primary element for corporate competitiveness and the development of its people.

We believe that teams with diverse skills, experiences and backgrounds enrich the work environment and stimulate creativity, fostering a more effective leadership style and nurturing an increasingly open corporate culture.

Furthermore, we are committed to:

- create an inclusive work environment that guarantees respect, integrity, personal development and equal opportunities (e.g. training, development, career),
- increase employee awareness of diversity and inclusion within the Group, also through the development of training programs and specific projects,

Respect for human rights in the supply chain:

Guala Closures Group is committed to ensuring that human rights are respected upstream and downstream of its production activities.

Our Suppliers and our Customers will be made aware of our Code of Ethics and Conduct and our Human Rights Policy, to ensure that they comply with the standard we have established for the management of human rights within the Guala supply chain Closures Group.

Actions

It is our intention to bring visibility, knowledge and awareness of human rights within the plants, educating employees, at various levels.

We make communication channels available to all interested parties (internal and external) to report, even anonymously, any abuse, harassment and any lack of respect for the principles and values set out in the Policies and in the Guala Closures Group Code of Ethics and Conduct (in this regard, an e-mail address is available on the company's website to which any reports can be sent).

We are committed to continuing our audit activity to monitor operational practices and verify compliance with our policies; in particular, we monitor the supply chain from the acceptance of a new supplier and throughout the duration of the business relationship.

This policy is periodically reviewed and updated if a change in legislation and/or in the supply chain impacts our business practices.

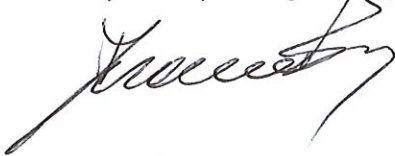
Responsibility about implementation of this policy lies within the entire company staff, which shall collaborate according to individual duties and competences, in meeting the principles set out above.

To this end, this document is disseminated to all Guala Closures Group employees and, through the Website and/or other communication channels, to external interested parties and to anyone who may request it.

These principles are common to all Guala Closures Group plants. Each Corporate Director and each B.U. General Manager shall understand, communicate and apply them to its organisation.

Franco Bove

(Chief Operating Officer)



Gabriele Del Torchio

(Chairman and Chief Executive Officer)

