

Code of Ethics and Conduct

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Our View

The code of ethics and conduct of Guala Closures S.p.A. (hereinafter also the “**Code**” or the “**Code of Ethics and Conduct**”) defines the ethical and social responsibility of the company and of each participant in the corporate organization by collecting all ethical principles and rules of conduct adopted and observed by Guala Closures S.p.A. and by each Company of the Guala Closures Group (hereinafter, jointly, **Guala Closures** or the **Group**).

Today, Guala Closures Group is a global business organisation, leader in the production of safety closures for bottles for alcoholic beverages with over 60 years of experience in the industry and in the production of aluminium closures.

Guala Closures mainly operates in the design and production of closures for alcoholic beverages, wine, and non-alcoholic beverages, such as water, olive oil and vinegar products, intended for domestic and international markets.

Guala Closures is an international group, multicultural by nature. In this dynamic and differentiated context, the Code of Ethics and Conduct aims at representing a practical and clear guide for all those who work and collaborate with the Group.

In fact, the Code is the main point of reference for acting in compliance with the principles of integrity, transparency and fairness promoted by Guala Closures in all the countries in which the Group operates.

For this reason, through this document, Guala Closures intends:

- To define and make explicit the values and principles that characterise the Group’s activities and relationships with employees, collaborators, customers, suppliers, shareholders, institutions, and any other party concerned;

- To formalise the commitment that all corporate components will always behave in a loyal, transparent, and correct manner, in compliance with all applicable regulations;
- To reaffirm human centrality through a sustainable and successful business model while at the same time committing to protect the legitimate interests of investors and all stakeholders;
- To communicate to employees and collaborators the values, principles of conduct and responsibilities that they are required to observe while carrying out their work.

The principles and provisions of this Code of Ethics and Conduct are intended for the members of the Board of Directors, the Board of Statutory Auditors, other governing or supervisory bodies of Guala Closures S.p.A. and other Group companies, as well as their managers, employees, and Third Parties (such as agents, joint venture partners, consultants, contractors, commercial counterparties, suppliers, and service providers), including occasional and/or only temporary ones (hereinafter also the **Recipients**).

The Code of Ethics and Conduct is valid all over the world, and observes the cultural, social, and economic diversities of the countries in which Guala Closures operates. At the same time, the Group always requires all the main suppliers and partners to adopt guidelines that constantly observe the general principles represented in this Code of Ethics and Conduct. Guala Closures also undertakes to ensure a timely internal and external dissemination of the Code by distributing it to all members of corporate bodies and to all employees.

The Code of Ethics and Conduct is published on the Guala Closures website at <https://gualaclosures.com>



General Section

Principles and values

Guala Closures pursues a principle of corporate social responsibility capable of effectively addressing economic, environmental, and social issues.

The creation of value addressing all stakeholders of the Group cannot overlook the compliance with some of those values that Guala Closures considers essential in all areas of its business:

Transparency and correctness

Clear, complete, and correct information in the activities carried out and in interpersonal relationships, promoting respect for and protection of human rights;

Legality and integrity

Maximum compliance with all applicable regulations in each country in which the Group operates;

Sustainability and environmental protection

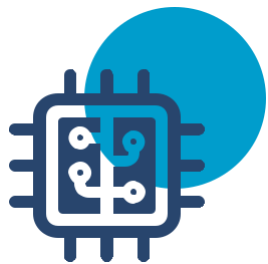
Guaranteeing health and safety in the workplace, in products and in the impact on local communities;

Quality and Innovation

Constantly researching the best solutions to improve, innovate and update our products and our processes with a view to continuous improvement;

Professionalism and recognition of results

Employee training and growth while aiming at continuous and constant development.



The term stakeholders refers to the subjects directly or indirectly involved in Guala Closures' activities who have an interest in the decisions, strategic initiatives and possible actions carried out by Guala Closures.

The main stakeholders of Guala Closures (hereinafter also **Stakeholders**) are, by way of example and not limited to:

- **Employees**
- **Other Group companies**
- **Customers**
- **Suppliers and business partners**
- **Shareholders**
- **Investors and banks**
- **Competitors**
- **Institutions, communities, and local communities**
- **Trade associations**
- **Media**
- **Environment**

Having fair relations with such stakeholders is an essential goal of Guala Closures.

As proof of a commitment always devoted to the improvement and strengthening of its internal processes, over the years Guala Closures has adopted and revised a series of policies regarding:

- **Environment**
- **Energy**
- **Quality**
- **Health and Safety**
- **Food safety**
- **Human Rights Policy and on Ethical-Social Aspects**
- **Land acquisition policy**
- **Modern Slavery and Human Trafficking**
- **Gender Equality.**

In November 2019, a revision of the Ethical/Social Policy was issued which draws attention to full respect for human rights.

The Group rejects any form of discrimination, forced or child labour and corruption. In this sense, the Group operates within the reference framework of the United Nations Declaration of Human Rights, the Fundamental Convention of

the International Labour Organization, and the OECD Guidelines for Multinational Enterprises. Lastly, in 2022, the Group updated this Code of Ethics and Conduct, a document that represents an evolution of the previous code of ethics adopted by Guala Closures and it is kept constantly updated.

Group policies are published on the Guala Closures website at <https://www.gualaclosures.com>

2

Correctness and transparency

In carrying out the activities for Guala Closures, the Recipients undertake to conform their conduct to the principles of correctness, integrity, transparency and legality.

To this end, all Recipients are required to:

- Observe the provisions of the Code and all the regulations, procedures, rules, and provisions of law that govern the activities carried out for Guala Closures;
- Collaborate with the utmost correctness and transparency with colleagues and managers, if any, always providing clear and complete information on their work, also in order to facilitate internal verification activities.

Each Recipient shall carry out his/her job and fulfilments with diligence, efficiency and fairness, by making the best use of the tools and time available and undertaking the responsibilities associated with any performance.

The Group prohibits any practice of corruption, illegitimate favour, collusive behaviour, solicitation

- directly and/or through third parties - of personal or career advantages for oneself or for others, even if only promised, in favour of private individuals, public officials or anyone who may boast existing relationships with the latter.

3

Conflict of interest

Conflicts of interest occur when a private business or personal interest of an individual employee, officer, or director for Guala Closures in any way interferes, or appears to interfere, with the interests of Guala Closures.

In carrying out their activities, the Recipients must pursue the objectives and interests of Guala Closures and avoid any possible conflict of interest, even potential, that could affect their ability to act and operate in the best interest of the Group and its Stakeholders.

It is necessary to avoid all situations in which a conflict with the interests of the Group may arise or which may interfere with the ability to impartially make decisions in the best interest of the Company and in full compliance with the principles and contents of the Code.

A conflict of interest can be actual or suspected. In both cases it could, even potentially, generate negative effects for the Recipients, the Group, and its Stakeholders. Having a conflict of interest is not, in itself, a breach of the Code. However, it is necessary to inform Guala Closures of such situation without delay, in accordance with the Reports section. Failure to disclose or delayed disclosure of a conflict of interest is a violation of the Code.

4

Respect and protection of company assets

The assets of Guala Closures consist of physical assets and intangible assets, the latter represented by the outcome of the work of all employees, by structural and commercial information of strategic importance entrusted to the personnel for the performance of their work.

The protection of all these assets is essential for the life and development of the Group. The loss, theft or improper use of such assets could, in fact, seriously harm the Company's interests.

Each employee is therefore responsible for the conservation and protection of all assets and tools that are personally entrusted to perform his/her work and must contribute to guaranteeing the protection of the entire Company assets. To this end, employees must observe the utmost respect for the operational and safety procedures established by Guala Closures.

The Recipients are required to work diligently to protect the corporate assets of Guala Closures, using the resources entrusted to them with care and responsibility and avoiding improper use.

Any use of these assets and resources that is in conflict with the interests of Guala Closures or is due to reasons unrelated to the employment relationship with the Group is prohibited.

The Company is sensitive to the need of ensuring fairness and transparency in conducting business and therefore requires that all Recipients of the Code of Ethics comply with current laws governing the use and circulation of money, credit cards and revenue stamps, and therefore will severely sanction any conduct aimed at the illicit use and falsification of credit cards, revenue stamps, coins, and banknotes.

5

Fight against organized crime

Guala Closures believes that organized crime, in addition to being a criminal phenomenon in itself, is a heavy influencing factor of free trade and healthy competition between companies. To fight this phenomenon, the Recipients of this Code are obliged to avoid any conduct that may, even unintentionally, favour organized crime, with an invitation to report to the competent authorities any situation that could represent a crime of this nature.

Recipients should use particular caution if they find themselves operating in areas historically affected by organized crime phenomena, in order to prevent the risk of criminal infiltration.

Guala Closures is subject to certain anti-money laundering laws and regulations related to its international business activities. Guala Closures is committed to full compliance with applicable laws.

6


Fight against terrorism

Guala Closures carries out its business in compliance with anti-terrorism regulations in force issued by the competent authorities. In this context, the Group refuses to carry out suspicious transactions from the point of view of correctness and transparency.

Recipients must avoid any involvement in operations that are suitable, even potentially, to encourage terrorism and act in full compliance with the regulations and internal control procedures.



Human Resources



Guala Closures applies and promotes the founding principles of the following conventions and declarations of international law:

- United Nations International Charter of Human Rights
- European Convention on Human Rights
- UN Convention on the Rights of the Child
- Fundamental conventions of Labour Organization
- Statement of Fundamental Principles and Rights at Work

Employees and Collaborators

Guala Closures staff is a fundamental factor for the success of the Group.

Guala Closures protects and promotes the value of its human resources, in order to preserve and develop the wealth of professional skills each employee possesses, by ensuring that the skills and legitimate aspirations of individuals are fully realised while achieving corporate objectives.

The Group undertakes to offer equal employment opportunities to all employees on the basis of professional qualifications and performance capabilities, without any discrimination.

Staff is hired with a regular employment contract. In no case an irregular form of relationship will be tolerated. It is absolutely forbidden to hire foreign candidates who do not have a regular residence permit.

Any form of discrimination against people based on trade union, political, religious, racial, ethnic, language, nationality, sex, sexual orientation, age reasons, economic and health conditions is prohibited.

All decisions taken in the area of human resource management and development, including those related to access to dissimilar roles or positions, are based on criteria of meritocracy, competence, and professionalism.

Human resources are valued in order to favour their development and growth. To this end, Guala Closures guarantees the physical and moral integrity of its employees and collaborators, ensuring working conditions that respect their personal dignity and comply with the environmental regulations of the law. Guala Closures also protects the privacy of its employees, in accordance with the laws in force

on this matter, and undertakes not to communicate or disseminate, without prejudice to legal obligations, any personal data without the prior consent of the party concerned.

Guala Closures identifies training as a tool for improving people, for spreading ethical values and strengthening of the corporate identity, of the organization and an agent for change and innovation.

During the employment relationship, Guala Closures expects its employees behave professionally and comply with relevant legal requirements. The Group therefore requires its employees:

- To always operate in compliance with the principles, values and rules established in this Code;
- To strictly observe all legal provisions of each legal systems under which Guala Closures operates.

For any undertaking of assignments and/or responsibilities (including, by way of example, consultancy activities or participation in the Boards of Directors, governing bodies, controlling bodies, committees, board or other work groups) in companies that are not part of the Group, the employee concerned must necessarily request prior and specific approval from Guala Closures.

Furthermore, the employee concerned must promptly inform Guala Closures of the purchase - by the employee or members of his/her family - of any qualified shareholding in companies that are competitors of Guala Closures or of any other interest that could lead to conflicts of interest or be prejudicial to the Group.

Health and Safety

In observance of the respect for the person, Guala Closures undertakes to spread and consolidate a profound culture of health and safety at work and to develop the awareness of risks and promote the responsible behaviour of all Recipients.

The Group is continuously working to protect, especially with preventive actions which are communicated in a clear and transparent manner, the health and safety of workers and of all interested Stakeholders.

Furthermore, Guala Closures strives to continuously improve the efficiency of corporate structures and processes.

Recipients shall contribute to maintain a salutary and healthy work environment, by participating in the process of risk prevention, environmental protection and health and safety protection for themselves, for their colleagues and third parties, by observing the rules and regulations and foreseen standards and by reporting any dangerous situation to their own safety or that of third parties.

In particular, the following will be considered as a voluntary assumption of risk and a damage to the safety of the working environment:

- Working in a state of alteration, or under the effects of alcohol abuse, drugs or substances having a similar effect;
- Consume or transfer drugs for any reason during the course of work.

It is also forbidden to smoke in workplaces except for those environments which are equipped with adequate technical devices capable of eliminating

any risk associated with smoking, even in countries where smoking would be permitted in workplaces.

Working environment and fight against discrimination

Guala Closures, on the basis of general principles and national and international regulations applicable to labour law, intends to favour the development of the potential and professional growth of each employee.

The Group also believes that the creation of a work environment that complies with these principles requires the active involvement of each employee.

Guala Closures does not allow behaviours, decisions, or evaluations of discriminatory content and which are based on political or trade union opinions, religious confessions, nationality, age, sex, sexual orientation, state of health and, in general, on any physical or intimate characteristic of human beings.

Guala Closures rejects any form of harassment, discrimination or abuse and expects the strictest compliance with this principle from all Recipients in accordance with all applicable law and regulations.

Guala Closures repudiates all kind of exploitation of child, juvenile and forced labour in each of the countries where it operates.

Any violation, even if only suspected, of this article of the Code must be promptly reported through the appropriate channel provided in the Reports section of the Code.

10

Freedom of association and right to collective bargaining

Guala Closures guarantees all its staff the right to form, participate in, and organize trade unions of their choice, also in order to bargain collectively with the Group. The staff of Guala Closures can freely join any labour organization of their choice, and this will not have any negative consequence or cause retaliation by the Group which also undertakes not to interfere, in any way, in the training, operation or management of the aforementioned workers' organizations or in the collective bargaining process.

Guala Closures ensures that union members, employee representatives and staff engaged in organising workers are not subject to discrimination, harassment, intimidation, or retaliation for being a union member, or employee representative, or being engaged in organising workers, and must ensure that these representatives can have contact with their members in the workplace.

In cases where the right to freedom of association and collective bargaining is limited by law, Guala Closures allows workers to democratically elect their own representatives.

11

Working hours and remuneration

11.1

Working hours

Guala Closures complies with current laws, collective bargaining (where applicable) and industry standards regarding working hours, rest, and public holidays in the countries in which it operates.

The regular working week, excluding overtime, is the one established by the applicable law and must not, in any case, exceed 48 hours.

11.2

Remuneration

The remuneration to be paid to employees must be proportionated to the service specified in the contract.

Guala Closures respects employees right to a living wage and guarantees that the salary paid for a normal working week, excluding overtime, always corresponds at least to the legal standards or minimum sector standards, or collective agreements (where applicable).

Guala Closures guarantees that the composition of workers' wages and allowances are clearly and regularly detailed in writing for each pay period. The organization must also ensure that wages and benefits are paid in accordance with the law.

Disciplinary practices

Guala Closures treats its staff with dignity and respect. Guala Closures rejects any form of harsh or inhuman treatment and requires the same uncompromising commitment to all Recipients, in particular to its employees, collaborators and suppliers in all the countries in which the Group operates.



Relationship with third parties

Competition, corruption, gifts

13.1

Competition

Guala Closures intends to protect the value of fair competition by refraining from collusive, predatory behaviour and abuse of a dominant position.

In relations with customers and suppliers, Guala Closures undertakes to comply with national and international laws that protect competition, dealing with the markets exclusively on the basis of the quality of its products and services. For this reason, the Group requires all Recipients to constantly comply with this conduct in carrying out their respective activities and duties.

Guala Closures rejects any form of unfair competition and undertakes to distance itself actively and promptly from any inappropriate conduct that should be undertaken in any capacity by third parties. The Group expects the same commitment from all Recipients in the fight against unfair competition.

13.2

Corruption

Guala Closures applies a zero tolerance policy against corruption and therefore condemns any type of corruption, whether it is real, supposed or attempted. Any contact with public or private Stakeholders must be based on the utmost respect for the general principles of fairness, loyalty, and transparency. It is therefore forbidden to offer, receive, propose, or make available, directly, or indirectly, sums of money, gifts, donations or benefits of any kind or nature to managers, officers, employees, or collaborators of public or private subjects for the purpose of obtaining undue advantages.

In consideration of the countries in which Guala Closures operates, the anti-corruption regulations

to which Guala Closures is potentially subject are different. For this reason, some general principles sanctioned by anti-corruption laws in force are detailed below and which:

- prohibit payments made both directly and indirectly - including those payments made to anyone with the knowledge that that payment will be shared with a Public Official or with a private individual - as well as offers or promises of a payment or other benefit for corruption purposes to Public Officers or private individuals;
- require companies to equip themselves and keep books, records, and accounting records which, with reasonable detail, accurately reflect operations, expenses, acquisitions, and disposals of assets.

13.3

Gifts and representation expenses

Guala Closures allows Recipients to make gifts and free gifts of modest value only, in compliance with the provisions and rules of the specific procedures and commercial policies adopted by the Group.

Any hospitality or entertainment expense may be carried out if they fall within the context of normal commercial courtesy and is such as not to compromise or influence the recipient's independent judgment.

In relations with customers and suppliers or with other Stakeholders with whom they come into contact for work reasons, the top management and employees can only accept gifts of symbolic value. Guala Closures Stakeholders who receive gifts or benefits not envisaged by the allowed cases must notify the Group Human Resources Department, which will assess their appropriateness.

This rule does not allow exceptions even in those countries where offering gifts of value to business partners is customary. To this end, it is specified that "gift" means any type of benefit (free participation in conferences, promise of a job offer, etc.).

Any violation, even if only suspected, of this article of the Code must be promptly reported by the Recipients through the appropriate channel provided in the Reports section of the Code. The Recipients must illustrate the situation and provide all the useful elements to allow Guala Closures to make informed and considered decisions on the matter.

Please refer to Guala Closures' Anti-Corruption Policy which sets forth the Group's rules and guidelines for compliance with anti-bribery and corruption laws.

14

Relations with Public Administrations

Relations between members of corporate bodies, Guala Closures employees and collaborators and public institutions must always be based on principles of legality, loyalty, correctness, transparency, and collaboration.

Any type of behaviour that can be identified to be of collusive nature or capable of prejudicing the principles expressed in this Code is rejected.

It is absolutely forbidden to give gifts, even of a symbolic nature or of modest value, to officials or employees of any Public Administration.

It is expressly forbidden to submit to the activity of pressure or persuasion, put in place by a public official or by an equivalent subject, aimed at creating in a private individual a condition of psychological subjection that may lead him to act as desired by the subject invested with public authority.

The undertaking of commitments with the Public Administration and public institutions is reserved for the designated and authorized functions.

Any employee who directly or indirectly receives proposals for benefits from public officials, public service employees or employees in general of the Public Administration or other public institutions must immediately interrupt any relation with them and promptly report by using the specific whistleblowing platform indicated in section "Reports" of the present Code.

The recipients of this Code of Ethics must not circumvent the provisions indicated above by resorting to different forms of aid.

It is strictly forbidden to mislead bodies of the State or a public body to procure an unjust profit or damage to Guala Closures. Unjust profit can be direct or indirect and also include contributions, loans, other disbursements, however called, granted by the State, by a public body, by the European Union or by any other international body.

It is also strictly forbidden to allocate contributions, loans or other disbursements however called, granted by the State, by a public body, by the European Union or by any other international body, to initiatives other than those aimed at the realization of works or the carrying out of activities of public interest for the which were obtained.

15

Relations with the Judicial Authority

The management of relations with the Judicial Authority and other institutional authorities is exclusively reserved to the specifically appointed corporate functions or their agents.

The Recipients are required to give maximum availability and collaboration to the judicial authority and/or other institutional authorities during any checks or inspections they may order. The Recipients who, for facts connected with the employment relationship, will be subject, even in personal capacity, to investigations and inspections or will receive subpoenas, and/or those who may be notified of other judicial measures must inform, the contact person of their related function and the Group Human Resources department.

16

Third Parties

Guala Closures will work only with Third Parties who share its commitment to integrity, transparency, respect for human rights, for the environment and the principles represented in this Code.

Third Parties are selected according to procedures set out in Guala Closures' Third Party Due Diligence Policy. Guala Closures rejects all Third Parties who violate the principles of personal freedom and dignity, who exploit labour, including child labour, and who discriminate based on sex, race, language, personal and social conditions, religious and political beliefs. Third Parties are expected to provide their employees with a safe and healthy workplace and to conduct business in an environmentally sustainable manner. Third Parties with whom Guala Closures engages must comply with the principles of equal opportunity, fairness, and impartiality.

The Company guarantees adequate competition for each purchase process as well as maximum transparency of supplier selection and purchase of goods and services.

Third Parties and employees must promptly report to their superior and/or company contact person, even through the reporting channels provided by Guala Closures, any behaviour of a Third Party that is or appears to be a violation of a Group policy or of the law.

Guala Closures applies a zero tolerance policy to corruption. Customers and suppliers who collaborate, act, in any capacity, with or for Guala Closures must comply with all applicable anti-corruption laws on the subject of corruption of public officials and private entities in all countries in which the group operates. Please refer to Guala Closures' Third Party Due Diligence Policy, which sets forth the rules and guidelines that must be followed in order for Guala Closures to carry out business and maintain relationships with Third Parties. All fees and sums paid to Third Parties must be adequately documented and in any case proportionate to the activity performed, in relation to the conditions generally applied on the market in relation to similar services.

All Recipients are required to ensure that suppliers and Stakeholders who have relations with the Company take adequate and timely actions in order to remedy any deficiencies or non-compliances identified during the performance of audits, inspections or visits to the plants or offices, also in compliance with the contents of this Code of Ethics and Conduct the Guala Closures Anti-Corruption Policy, and the Guala Closures Third Party Due Diligence Policy. Guala Closures pays attention to possible risks of violation of the Code of Ethics and requires Third Parties to promptly report any potential violation.

17

Economic sanctions

Guala Closures operates in several jurisdictions across the globe, which raises additional risk in its regular business activities. The Group is aware that foreign jurisdictions, entities, and individuals

may be subject to economic and trade sanctions from national or supranational authorities that limit regular business activities.

Given the dynamic and evolving nature of these sanctions, Guala Closures adopts a risk-based approach that is aligned with the nature and complexity of its business. The Group and Recipients must be aware of and comply with regulations since breaches can result in civil and criminal liability for the Group and individual employees.

Please refer to Guala Closures' Sanctions Compliance Policy, which sets forth the Group's rules and guidelines for compliance with economic and trade sanctions laws and regulations.

All Recipients are required to ensure that Guala Closures, the Group, Recipients, and Third Parties are complying with economic and trade sanctions policies. All parties are required to report any violation or potential violation.

18

Customers

In compliance with this Code, Guala Closures is extremely sensitive about meeting customer needs, by continuously committing itself to maintaining a high quality standard.

Guala Closures main objective is to create a relationship with its customers inspired by fairness, transparency, and efficiency.

The relationship with customers is based on mutual respect for ethical principles.

Guala Closures ensures that negotiations and contractual relationships with customers and clients are based on the highest rating of legality, correctness, and seriousness, in full compliance with laws in force.

Guala Closures guarantees the confidentiality, security, and protection of the information in its

possession, by not disclosing financial and other data concerning customers, except for legal obligations.

19

Environmental protection

The environment is a primary asset that Guala Closures is committed to safeguarding.

To this end, Guala Closures plans its activities by seeking a balance between financial initiatives and essential environmental needs, in consideration of the interests and rights of future generations.

Guala Closures therefore undertakes to improve the environmental impact of its activities, as well as to prevent risks to populations and the environment not only in compliance with current legislation, but also considering the development of scientific research and the best experiences in the field.

Guala Closures guarantees that its entire structure pursues objectives that are consistent with strategic environmental objectives and scrupulously complies with the laws and regulations on environmental matters applicable in all the countries in which it operates.

The Group expects its customers, suppliers, and business partners around the world share the same commitment to protect the environment.

To leverage all possible synergies, the definition of the environmental policy and its implementation are managed in a unitary and coherent way by the Group which:

- Defines environmental policies and sustainable industrial development;
- Elaborates the guidelines for the implementation of the environmental policy which must be taken as a reference by subsidiaries;
- Identifies indicators and ensures monitoring and control of the progress of

- company actions in terms of environmental impact;
- Follows the evolution of national environmental laws, of those of European Union and in general in the countries in which it has plants and prepares the appropriate application guidelines;
 - Manages relations with bodies, institutes, and agencies in the environmental field; it also promotes, implements, and coordinates agreements and program agreements with these subjects as well as with institutions.

All Recipients undertake to dispose of the waste produced in compliance with the internal processes approved by Guala Closures and with current and applicable laws.

Guala Closures annually publishes the Annual Report on Sustainable Development, a document that concentrates and summarises all ongoing or planned initiatives for a sustainable and environmentally focused business development.

The Annual Sustainability Development Report is available at: <https://www.gualaclosures.com>



Relations with stakeholders

Transparency of accounting activities

All activities and actions carried out and performed by the Recipients of this Code in the context of their respective work skills must be verifiable.

Accounting transparency is based on the accuracy, completeness, clarity, and reliability of the documentation concerning management events and related accounting records. Each Recipient is required to collaborate so that the management facts are correctly and promptly represented in the accounts.

Adequate supporting documentation relating to the activity carried out is kept in the records for each operation, in order to allow easy accounting registration, the identification of different levels of responsibility as well as the accurate reconstruction of the operation.

Guala Closures, in compliance with anti-money laundering and anti-terrorism regulations in force, endeavours to prevent the use of its economic-financial system for purposes of money laundering and financing of terrorism (or any other criminal activity) by its managers, employees and of the counterparties with which it relates while carrying out its activities.

It also ensures that the operations to which it is a party do not present, even if only potentially, the risk of favouring the receipt, replacement or use of money or other assets deriving from illegal activities.

Recipients who become aware of omissions, falsifications, alterations, or negligence of the information and supporting documentation are required to promptly report by using the specific whistleblowing platform indicated in section "Reports" of the present Code.

Guala Closures acknowledges tax payment as a civic duty of solidarity and therefore guarantees compliance with fiscal and tax regulations in force in the countries in which it operates and undertakes to promptly provide to the competent Revenue authority any information required by law, according to the applicable terms, in order to ensure the correct assessment of taxes.

Political parties

Guala Closures does not make direct or indirect contributions to political parties, nor to their representatives or candidates. Every senior manager, employee, collaborator must recognize that any form of involvement in political activities takes place on a personal basis, in their own free time, at their own expense and in compliance with the laws in force.



Information and Confidentiality

Communications and Confidentiality

22.1

Communications

Any relation with communication entities must be based on the utmost clarity and ensure continuous compliance with the truth of what has been disclosed.

Regardless of whether it is internal or external communications, regardless of the means used, Guala Closures only communicates accurate and complete information, in the interest of all stakeholders involved and interested.

Institutional and financial communications must be coordinated by the Investor Relator function while those of commercial and promotional nature by the Marketing function.

If contacted by the press or media in order to issue statements or interviews, any employee, manager, or collaborator, must promptly inform the Marketing department of Guala Closures. No statement or interview must be released, for any reason, without having previously informed such functions concerned, which can be contacted at the addresses: marketing@gualaclosures.com

If the employee is required to represent the position and activities of the Group in any form and occasion (for example conferences, participation in conferences and other public interventions, drafting of articles or other publications), a prior agreement and authorization of the relevant functions shall be required.

22.2

Confidentiality

The performance of activities for Guala Closures entails for Recipients the acquisition, storage, handling, disclosure, and circulation, within and outside the Group, of information, documents,

studies, work projects (including commercial plans), technological processes, trademarks, patents, copyrights and industrial property rights, know-how, of written, digital and/or verbal data and information (hereinafter also "**Confidential Information**"). Confidential Information is owned by Guala Closures and cannot be used, disclosed, transferred, or exploited in any way without a specific authorisation from Guala Closures.

Personal data protection

Without prejudice to compliance with the specific applicable laws on the protection of personal data, Recipients are required to process personal data of which they become aware by adopting the strictest confidentiality measures and ensuring the maintenance of their confidentiality, integrity, and unavailability.

In particular, pursuant to Regulation 2016/679/EU (the so-called **GDPR** or General Data Protection Regulation), any unauthorized employee is prohibited from accessing, knowing, registering, processing, storing, and disclosing personal data of which Guala Closures is the Data Controller or Data Processor.

In case of breach, the administrative and criminal penalties established by the applicable law and regulation, including GDPR, may be applied, as well as the disciplinary sanctions provided, in general, by collective agreements (if any) and by the regulations for the protection of company assets.



Implementation

Contractual value

This Code of Ethics and Conduct is an integral part of the employment relationship established with Guala Closures.

Compliance with the rules of the Code must be considered an essential part of the obligations of Group's employees. Any breach of the Code rules may constitute a non-fulfilment of primary obligations of the employment relationship or a disciplinary offense, with all legal consequences, also with regard to the preservation of the employment relationship and may lead to actions for compensation for damages caused by such breach.

For Recipients who are not Group's employees, observance of the Code is an essential prerequisite for the initiation or continuation of the professional/collaboration relationship in place with Guala Closures.

The violation of the rules of the Code is sanctioned on the basis of the provisions of the specific contract, without prejudice to the right of Guala Closures to request compensation for damages occurring as a result of such violations in accordance with the applicable law.

Reports

Any breach, even if only suspected or attempted, of this Code of Ethics and Conduct must be promptly reported to Guala Closures by the Recipients, or by the Stakeholders or third parties by sending a notice by using the specific whistleblowing platform available on <https://gualaclosures.integrityline.com>

If you have any doubts, you can contact your contact person or in any case activate a report through the whistleblowing channels made available by Guala Closures.

Each collaborator or employee of Guala Closures is, in any case, required to promptly report:

- Any non-compliance with this Code;
- Any request for breach of the Code, from anyone to their manager or, alternatively, sending a report on the whistleblowing software available on the Group's website.

Those who make the aforementioned report will be required to illustrate the situation in detail and provide all the useful elements to allow Guala Closures to make informed and thoughtful decisions regarding the facts described.

Guala Closures will not tolerate any retaliation against a person who has made a report in good faith and / or who collaborates in an investigation pursuant to this article of the Code and in accordance with the applicable law.

Updates

The Chief Executive Officer modifies and integrates the provisions contained in this Code of Ethics and Conduct, by submitting the most significant corrections to the attention of the Board of Directors for the necessary approval.

This Code has been approved by resolution of the Guala Closures S.p.A. Board of Directors dated 29 November 2024.

Guala Closures S.p.A.

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