

## Ethics and social policy

*The policies of Guala Closures Group are all characterised by a common, relentless commitment to sustainable development, which enables us to strengthen our market leadership in the production of closures for alcoholic beverages, wine and soft drinks, oil and vinegar, pharmaceutical products and PET products, in full respect of human rights and ethical – social concerns, product safety and workplace safety, while safeguarding the environment.*

*The **ethics and social policy** of Guala Closures Group is based on three pillars:*

### ➤ Our people

*We want our employees to be our added value and we are committed to managing our human resources in a correct and clear manner.*

*This means:*

- *guaranteeing that all workers have a legitimate contract of employment and guaranteeing the minimum wage established by law;*
- *guaranteeing freedom of association and collective bargaining;*
- *not employing child labour;*
- *not using forced labour;*
- *not discriminating and ensuring equal opportunities and procedures to encourage inclusion regardless of religion, race, gender, political or spiritual beliefs, age and disability;*
- *guaranteeing adequate working conditions, treating all workers with dignity and respect, prohibiting the use of irregular disciplinary practices and/or corporal punishment;*
- *guaranteeing that our employees and external providers work in healthy and safe working environments in accordance with the applicable legislative standards for occupational health and safety.*

### ➤ Our suppliers

*We want those involved in the supply chain to be aware of business integrity aspects and of sustainable development and that they comply with the content of this policy.*

*This means that our suppliers must:*

- *guarantee that ethical and social aspects are respected, not use child labour or exploit workers, and apply the pertinent contracts of employment;*
- *avoid any potential act of corruption, intimidation and fraud;*
- *guarantee compliance with the applicable standards and laws on occupational health and safety, food safety and the external environment;*

*In turn, we undertake to:*

- *guarantee ethical behaviour in managing relations with suppliers (with reference to the Code of Ethics of Guala Closures Group);*
- *support our suppliers that demonstrate an interest in our sustainability programme, developing dedicated projects and activities together;*
- *select and assess our suppliers also on the basis of their commitment to implementing and complying with this policy.*

## ➤ The external community and other stakeholders

*Guaranteeing sustainability and integrity with all stakeholders is one of our priorities.*

*This means:*

- *endorsing and meeting compliance obligations and the additional requirements of our stakeholders;*
- *guaranteeing that work practices and production processes safeguard the environment;*
- *undertaking improvement initiatives or projects with local communities (schools, local authorities etc.);*
- *establishing improvement objectives and KPIs to measure performance in terms of workplace safety and the environment;*
- *not exploiting or discriminating against external communities;*
- *incorporating the suggestions, expectations and requests of external communities and other stakeholders that are part of the supply chain.*

*This policy is common to all Group production plants and has been signed by the General Management of Guala Closures Group.*

*Each local General Manager or Plant Manager must be committed to this policy, understanding it, communicating it and applying it to their organisation, combined with preparing, implementing and verifying adequate measurable objectives in accordance with the Group sustainability programme.*



**F. Bove**  
( Chief Operating Officer )



**G. Del Torchio**  
( Chairman and Chief Executive Officer )