

# Land acquisition policy and start-up of new production sites

## About us

*Guala Closures Group is the world leader in the production of non-refillable closures and in anti-counterfeiting technologies, with over 14 billion closures sold each year.*

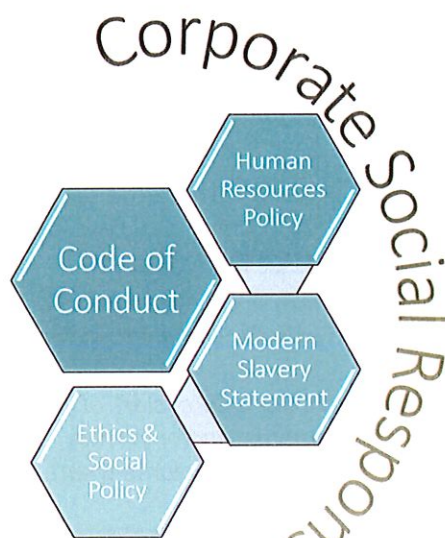
*Our technological innovation has provided spirits manufacturers with solutions that make the counterfeiting of packaging increasingly difficult, enabling them to protect their brand image.*

*We are committed to maintaining the highest ethical standards, and to maintaining and improving global policies and processes to avoid any potential complicity in human rights violations related to our operations or supply chain.*

## Our Policies

*In order to promote ethical business practices Guala Closures Group have implemented a global policy framework. These policies apply to all our plants and operations and are intended to create core values for all parties including employees, customers, suppliers, shareholders, investors and local communities.*

*Our Company behaviour is driven by the three dimensions of our corporate responsibility including social, environmental and economical.*



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## Our principles related to land acquisition and subsequent manufacturing operations

*The land acquisition for public purpose is inevitable in a growing economy; nevertheless, Guala Closures Group will never acquire land in forced manner.*

*Our principles related to land acquisition and/or creation of new manufacturing sites are:*

- *We are opposed to the use of any form of forced land acquisition as land shall be acquired through free negotiation and after clear payment of adequate compensation at market value.*
- *We believe that local communities need to have benefit by the industrial areas, so that we encourage local recruitment of local personnel to work in our manufacturing sites.*
- *We are committed to respecting and protecting the rights and the culture of local communities and those affected by our operations.*
- *We are committed to providing a safe and suitable working environment, free of discrimination.*
- *We are committed to minimizing our environmental impacts and to protecting ecologically significant areas, flora and fauna.*

## Governance & Responsibility

*Whilst the Global policies will be set at Group level, it is the responsibility of each Guala Closures employee to ensure the policies are applied in practice and any concerns are reported at the earliest opportunity.*

*Global policies will be reviewed periodically and updated where a change in legislation impacts our Company practices.*

## Future Actions

*It is our intention to drive the visibility, knowledge and awareness of our land acquisition policy to all General Managers of the various Business Units of Guala Closures Group for local application.*

*In order to prevent indiscriminate acquisition, for future start of new sites, it is our intention checking in advance the methods used by local Governments and/or private Organizations to acquire land and/or to create industrial areas and/or to build industrial infrastructures where we are going to install our business.*

*We will commit to continue our audit activity to understand practice and verify our compliance with our Global policies.*



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



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