

## CUSTOMER PROTECTION POLICY

Guala Closures issued a "Customer protection policy" to guarantee a service which not only focuses on the end product, but also on the development of a correct relationship during all the product definition phases in order to prevent any improper use of information, products, brands or property belonging to the Customer.

The Customer protection policy is based upon the commitment of the Guala Closures Group to implement, within its plants, reserved measures for the treatment of the information and data exchanged with Customers and activities to protect the brands produced in order to safeguard their integrity and avoid improper use (details of how this will be fulfilled are given in the various Quality System documents), in particular:

### ➤ Reserved treatment of information and data exchanged with Customers:

Guala Closures undertakes to implement a reserved treatment and to refrain from distributing to third parties (internally and/or externally) all information, data, specifications, artwork, drawings, materials and IT data exchanged with Customers concerning:

- custom development of products,
- construction and monitoring of products in production.

### ➤ Treatment of Customer requests for samples:

Guala Closures undertakes to subject all Customer requests for samples to prior analysis to avoid manufacturing products with aesthetics and customised details which might cause damage to or create misunderstandings with the image of other Customers. Therefore, before supplying samples, it is necessary to:

- check for similarities with existing brands,
- as regards guarantee closures, customise the samples supplied (unless there are clear motivations and precise agreements to the contrary, anonymous samples may not be sent),
- check the method of use of the product by the Customer.

### ➤ Treatment of Customer requests for supplies:

Guala Closures undertakes to subject all Customer orders to prior analysis to avoid manufacturing products which could be subject to improper use; it is particularly necessary to:

- as regards guarantee closures and products sold to distributors as opposed to the end Customer, insist on the transmission of a declaration stating the destination of any anonymous products,
- check the origin of orders for a single product and/or code from different channels,
- agree to product supply specifications which conform with this policy.

### ➤ Confidentiality of information and data exchanged with Suppliers:

Guala Closures undertakes to ask its Suppliers to implement a reserved handling treatment, to refrain from distributing to third parties (internally and/or externally) and from subjecting to improper use all information, data, specifications, artwork, drawings, materials, products or any property belonging to the Customer, as well as IT data exchanged with Suppliers, signing appropriate supply documents and/or specifications, concerning:

- construction of production equipment,
- supply of raw materials and accessories,
- performance of outwork or external checks.

➤ **Treatment of suitable products, rejects and obsolete products:**

Guala Closures undertakes to monitor half-finished products, finished products, rejects or any obsolete products during the product construction processes and storage in order to prevent removal from the working or storage areas and/or their improper use, by:

- precisely identifying half-finished and finished products,
- checking the disposal and demolition of rejects,
- segregating obsolete products or products returned by Customers.

➤ **Control of access to the various working areas and IT stations:**

Guala Closures undertakes to monitor all accesses to the production areas and technical, commercial and administrative offices to prevent information or materials from being removed or subject to improper use, by:

- registering the entry and exit of external staff and controlling movements within the plant (internal accompaniment),
- issuing permits allowing internal staff to enter/leave offices,
- imposing authorization of visits to the plant by external staff and/or Customers (granted by General Management and/or Plant Management),
- forbidding all external visiting staff from taking photos, samples or documents.

Similarly, profiles and passwords are necessary for internal staff to use the IT stations and consult IT systems and data.

➤ **Staff training and awareness:**

Guala Closures undertakes to provide its staff with training and information on the contents and requisites of this Customer protection policy, through:

- internal communication channels,
- training of new staff and any special courses which might be necessary.

Furthermore, during the training are also taken up the contents of the Code of Ethics and Conduct of Guala Closures Group, which incorporates some of the principles defined in this policy.

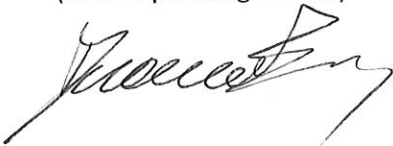
Responsibility about implementation of this policy lies within the entire company staff, which shall collaborate according to individual duties and competences, in meeting the principles set out above.

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 B.U. General Manager and each Plant Manager shall understand, communicate and apply them to its organisation.

*Franco Bove*

(Chief Operating Officer)



*Gabriele Del Torchio*

(Chairman and Chief Executive Officer)

