

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

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

Our commitment to human rights, including our position on forced labour, involuntary labour, child labour, and human trafficking, is also outlined in our Code of Ethics and Conduct and in our Human Rights Policy and on Ethical-Social Aspects.

Our main principles related to modern slavery and human trafficking are:

- We are opposed to the use of any form of child labour or practices that inhibit the development of children.
- We believe that all employment should be freely chosen and commit to refrain from any form of forced or involuntary labour.
- We are committed to respecting and protecting the rights of our employees, those employed in our supply chain, and those affected by our operations.
- We are committed to providing a safe and suitable working environment, free of discrimination.
- Every employee will have a legitimate contract of employment which guarantees minimum wage appropriate to their location.

Modern slavery and human trafficking statement

The risk of modern slavery and human trafficking could be inherent in supply chains, for materials delivered to Guala Closures Group, and it might occur without our knowledge and in violation of our policies.

We seek to address this risk through the policies, procedures and other measures and actions as here below described.

Actions

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

Both our Code of Ethics and Conduct and our Human Rights Policy Human Rights Policy and on Ethical-Social Aspects are disseminated to our suppliers, asking them to respect all contents (respect for human rights within the supply chain for Guala Closures Group).

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.

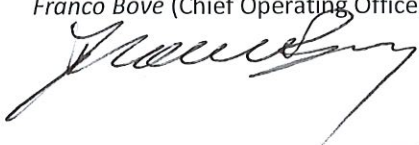
This policy is periodically reviewed and updated if a change in legislation and/or in the supply chain impacts our business practices.

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)

