

CODE OF ETHICS

Vetrerie Riunite S.p.A.

This document outlines the ethical principles and rules of conduct that strengthen and give concrete expression to the general principle of legality, understood as respect for all laws, regulations, administrative measures and, in general, legislative provisions in force.

Purpose

Maintain the highest possible ethical standards in the carrying out of company activities, defining the principles and rules of conduct for all stakeholders.

Addressees

- Members of Corporate Bodies (Board of Directors, Board of Statutory Auditors);
- Top and middle management;
- Employees;
- Consultants, agents, commercial partners, suppliers and collaborators, however described.

All Addressees must observe and, as far as falling within their competence, ensure that others observe the principles of the Code of Ethics.

Ethical principles

Respect for personal dignity and impartiality

Vetrerie Riunite S.p.A. considers respect for the individual as a priority. In the decisions that affect relationships with its stakeholders (customer management, organisation of work, selection and management of suppliers), Vetrerie Riunite S.p.A. does not tolerate any form of discrimination based on age, gender, state of health, race, nationality, political opinions and religious beliefs. In internal and external work relations, Vetrerie Riunite S.p.A. demands that no kind of harassment occurs towards employees, suppliers, customers or visitors, with harassment meaning any form of intimidation, threat, behaviour or verbal insult that impedes the smooth running of working activities, or a hierarchical superior's abuse of his or her position of authority.

Observance of the law

In carrying out activities and in relations of any type and nature, the employees and collaborators of Vetrerie Riunite S.p.A. are obliged to diligently comply with the laws in force, the Code of Ethics and internal regulations. Under no circumstances shall the pursuit of the interests of Vetrerie Riunite S.p.A. justify any action that breaches an ethically and legally correct line of conduct.

Transparency and completeness of information

The collaborators of Vetrerie Riunite S.p.A. are required to provide complete, transparent, comprehensible and accurate information to enable all stakeholders to make autonomous and informed decisions in developing their relations with the same. In particular, in concluding any type of agreement, Vetrerie Riunite S.p.A. shall take care to specify to the contracting party, in a

clear and comprehensible way, the conduct to be maintained during the course of the relationship.

Confidentiality

Vetrierie Riunite S.p.A. ensures the confidentiality of the information in its possession and refrains from seeking confidential information, except in the case of explicit and informed consent, and in compliance with the legislation in force. The collaborators of Vetrierie Riunite S.p.A. shall not use any confidential information for purposes unrelated to the carrying out of their activities.

Value of human resources

Vetrierie Riunite S.p.A. has always been committed to the qualifications and skills of its employees as they are essential to its success. The company therefore protects and promotes the value of human resources with the aim of maximising the level of satisfaction and broadening its skills base. Therefore, in the management of relationships that involve the establishing of hierarchical relations, Vetrierie Riunite S.p.A. requires that authority is exercised fairly and correctly, prohibiting any conduct that may be considered detrimental to the dignity and autonomy of the collaborator.

Environmental protection and sustainable development

Vetrierie Riunite S.p.A. is strongly committed to eco-sustainable development through concrete investments and an advanced environmental policy capable of eliminating impact on the environment. The environmental management system is integrated with the management of health and safety in the workplace and the quality of products and processes. With a monitoring plan approved and verified by public control bodies, there is a constant improvement in the levels of impact on the various environmental matrices such as air, water and soil. Vetrierie Riunite S.p.A. is committed to constantly reduce greenhouse gas emissions. The Kyoto protocol has never been considered an obligation, rather an instrument to achieve an ever-increasing energy efficiency that enables the containment of CO₂ emissions.

Protection of health and safety in the workplace

The primary mission of the activities of Vetrierie Riunite S.p.A. is the safeguarding of the health and safety of employees, external parties who come into contact with the company, customers and the surrounding population. Equally important is the aim of zeroing accidents at work and occupational diseases. Vetrierie Riunite S.p.A. is therefore committed to disseminating and consolidating a culture of safety by developing the awareness of risks and promoting responsible behaviour by all employees and collaborators.

Technological efficiency and innovation

Vetrierie Riunite S.p.A. seeks to run the company economically and efficiently to provide products and solutions with a high quality/cost ratio and achieve the full satisfaction of its customers. In this context, it has made innovation its strategic focal point, and it is thanks to this that the company can today boast a very high technological level.

Social responsibility

Vetrerie Riunite S.p.A. is aware of the influence that its activities can have on the conditions, social and economic development, and general wellbeing of the general public, as well as the importance of social acceptance from the communities in which it operates. For this reason, Vetrerie Riunite S.p.A. seeks to conduct activities aimed at the social appreciation of its business purpose, with due regard for the communities with which it interacts.

Prevention of conflicts of interest

In carrying out any activity, Vetrerie Riunite S.p.A. seeks to avoid situations in which the persons involved in transactions are, or may only appear, to be in conflict of interest.

Fairness in relations with competitors

Vetrerie Riunite S.p.A. seeks to protect the value of fair competition by refraining from collusive or anti-competitive behaviour.

Rules of conduct**Relations with corporate bodies**

Besides observing the provisions of law, the members of the corporate bodies must also comply with the provisions of the Code of Ethics. Specifically, the corporate bodies must:

- Ensure the truthfulness, completeness, clarity and timeliness of information, both internally and externally, and ensure the maximum accuracy in the processing, storage and updating of accounting and corporate data and information;
- Correctly and promptly record in the company's accounting system each operation or transaction according to the criteria established by law and applicable accounting principles; each operation or transaction must be authorised, verifiable, legitimate, coherent and congruous;
- Participate, according to their respective responsibilities, in the creation and implementation of an effective company control system and involve the other individuals with whom they have relations;
- Keep confidential the information they become aware of during their service and avoid abuse of position to derive personal gain.

Relations with employees**Personnel selection and management**

Vetrerie Riunite S.p.A. offers the same opportunities without any discrimination, starting from the moment of personnel recruitment. The assessment of candidates taking part in the recruitment process is focused on the verification of the fulfilment of the professional and personal requisites of the required profile, while respecting the candidate's dignity, personality, privacy and opinions. Favouritism, forms of patronage or nepotism are not permitted. Those who select or participate in selection must not find themselves in situations of potential conflict of interest with the candidate.

Personnel are recruited with a regular employment contact in full compliance with the law and the CCNL (national collective labour contract), fostering the integration of the worker into the workplace.

Vetrerie Riunite S.p.A. offers the same career opportunities to those in possession of the characteristics required for access to higher functions, roles and/or promotions, without any discrimination and based on merit, professional skills acquired and, in any case, based on strictly professional parameters. The company gives priority to the training of staff and constant updating on specific subjects (for example, safety at work and the updating of technical skills).

Duties of employees and collaborators

Diligence and good faith

Each employee and collaborator must act loyally and in good faith, observing all the obligations undertaken when signing the employment contract and ensuring an active and intense collaboration, according to the company's directives, and must be aware of and observe the ethical rules contained in this Code of Ethics, basing their conduct on respect and mutual collaboration.

All actions, operations and negotiations and, in general, the conduct adopted in the carrying out of working activities must be founded on the principles of honesty, fairness, integrity, transparency, legitimacy, clarity and mutual respect, as well as be open to checks and controls according to current laws and internal procedures.

All activities must be carried out with professional diligence. Each person must make a professional contribution that is in line with allocated responsibilities and must act in a way to protect the prestige of the company. The directors shall accept their appointment when they believe they can dedicate the time necessary to perform their duties diligently.

The personnel of Vetrerie Riunite S.p.A. must be aware of and implement the company's provisions in terms of environmental protection, occupational safety and hygiene, and privacy protection, in relation to the function performed and/or level of responsibility attributed.

Conflict of interests

Directors, auditors, managers, employees and collaborators of Vetrerie Riunite S.p.A. must not engage in activities that are considered, even potentially, in conflict with the interests of the company.

It is strictly forbidden to take personal advantage of business opportunities which may have come to their knowledge during the performances of their duties within the company.

Before accepting a consulting, management or administrative position, or employment or self-employment, or another appointment in favour of another subject, or if a situation of conflict of interests, even potential, should occur, each employee is required to point out to the company, in

the same manner as described above, the situations of conflict of interests that are employees are involved in and which have come to their knowledge.

It is strictly forbidden to use confidential information acquired during the carrying out of working activities for one's own benefit or for the benefit of third parties.

Protection of corporate assets and the working environment

Each employee and collaborator is required to safeguard the company's assets, protecting its mobile and fixed assets, equipment, company products, and information and know-how of Vetrerie Riunite S.p.A.

Specifically, each employee and collaborator must:

- Use company assets according to company policies, strictly observing all security programmes to prevent unauthorised use or theft;
- Avoid improper use of company assets that may cause damage or reduced efficiency, or in any case in contrast with the company's interests;
- Preserve the confidentiality of confidential information regarding the company or the company's commercial partners, avoiding disclosure to third parties.

Company IT and telecommunication resources

Each employee and collaborator is obliged to safeguard the company's IT and telecommunication assets, by protecting the technological resources and IT equipment of Vetrerie Riunite S.p.A., and, in particular, must strictly observe the company's IT regulations and security policies, in order to avoid compromising the functionality and protection of the IT systems.

Each employee and collaborator is responsible for the protection of technological assets and resources entrusted to him or her and is required to promptly inform their direct superior of any events that are potentially harmful for such assets and resources.

Protection of image

The good reputation and image of Vetrerie Riunite S.p.A. represent a fundamental, immaterial value to be protected at all times, both within and outside the company. The members of the Board of Directors, the Board of Statutory Auditors and the employees of Vetrerie Riunite S.p.A. undertake to:

- Act in compliance with the principles of this Code of Ethics in relationships with colleagues, customers, suppliers and third parties in general, maintaining a conduct based on quality, openness and decorum in line with the standards that are common to companies of the size and importance of Vetrerie Riunite S.p.A.;
- Abstain from any conduct which may, directly or indirectly, cause harm to Vetrerie Riunite S.p.A. in terms of market image and/or credibility.

Relations with customers

Vetrerie Riunite S.p.A. aligns its conduct in relations with customers to the principles of legality, transparency, fairness, reliability, responsibility and quality.

Duties of employees and collaborators

- Strictly observe all legal provisions and regulations, the provisions of this Code of Ethics, and the internal procedures pertaining to the management of relations with customers;
- Provide the customer with all relevant information on the terms and conditions of contracts related to the products and services offered, so that the customer is fully aware when finalising the agreement, strictly observing the related company procedures;
- Be truthful in advertising, avoiding any misleading practice;
- Adopt behaviour characterised by openness, respect and courtesy, in line with the standards of Vetrerie Riunite S.p.A., and characterised by the highest professionalism;
- Pay great attention to customer satisfaction in order to continuously improve the quality of products and services offered, politely taking on board any suggestions or complaints from customers;
- Preserve one's independence against internal and external constraints.

It is strictly forbidden to:

- Entertain commercial relations with persons involved in criminal activities, such as, by way of example, trafficking in weapons, trafficking in narcotic drugs, money laundering, terrorism;
- Entertain relations with persons who, to the extent known, lack the necessary requisites of respectability, soundness and reliability;
- Entertain commercial relations with persons who, even indirectly, engage in behaviour contrary to individual freedom and status and/or violate or contribute to violating fundamental human rights (for example, exploiting child labour, promoting sexual tourism, child pornography, etc.);
- Receive money or other benefits from customers to perform an act which is already one's duty or that is contrary to one's duty;
- Give or receive, directly or indirectly, gifts, complimentary items, hospitality or other benefits, except for small courtesy gifts or donations such as those given on certain festivities and holidays.

Employees receiving gifts or benefits not directly attributable to normal courtesy relations must take all necessary steps to refuse those gifts or other benefits and inform their direct superior or the Human Resources Director.

Relations with suppliers

The company's relations with suppliers are based on the principles of transparency, equality, loyalty and competition.

Duties of employees and collaborators

- Strictly observe internal procedures related to the selection and management of relations with suppliers;
- In relations with suppliers, observe and respect the applicable laws and contractual terms;
- In correspondence with suppliers, observe the principles of transparency and completeness of information;
- Avoid receiving money or other benefits from suppliers to perform an act which is already one's duty or that is contrary to one's duty;
- Avoid giving or receiving, directly or indirectly, gifts, complimentary items, hospitality or other benefits, except for small courtesy gifts or donations such as those given on certain festivities and holidays.

Employees receiving gifts or benefits from suppliers not directly attributable to normal courtesy relations must take all necessary steps to refuse those gifts or other benefits and inform their direct superior or the Human Resources Director.

Employees who participate in the supplier selection process must:

- Afford suppliers who meet the necessary requisites an equal opportunity to participate in the selection process;
- Refrain from entertaining relations with suppliers who are known not to meet the subjective requisites concerning professionalism and respectability;
- Check, also through suitable documentation, that the suppliers participating in the selection process have the financial means, organisational structure, capacity, know-how, quality systems and resources consistent with the needs and the image of Vetrerie Riunite S.p.A.

Relations with external collaborators

Collaborators, however named, are required to observe the principles of the Code of Ethics.

Duties of employees

- Strictly observe internal procedures related to the selection and management of relations with the company's external collaborators, however named (collaborators, consultants, representatives, agents, business developers);
- Avoid selecting persons and businesses who are known to lack impeccable moral integrity;
- Promptly contact direct superiors or the Director of Human Resources in case of any violation of the Code of Ethics by the company's collaborators;
- Expressly mention in all collaboration contracts, however named (collaboration, consultancy, agency, business procurement), the obligation to adhere to the principles of the Code of Ethics, punishing any breach of those principles by granting Vetrerie Riunite S.p.A. the option to terminate the contract.

Relations with public authorities

Vetrerie Riunite S.p.A. relations with public authorities – state, regional and municipal, national or EU – or in any case concerning relations of a public sector nature, must be guided by the strictest observance of applicable laws and regulations and cannot in any way compromise the integrity and reputation of the company.

The entering into commitments and management of relations, of any kind, with public authorities and/or relations of a public sector nature, are exclusively matters for the corporate functions charged with such and duly authorised.

In its relations with public authorities, Vetrerie Riunite S.p.A. must refrain from inappropriately influencing the decisions of the institution concerned.

In any case, in relations with public authorities and in cases of audits/inspections/checks by the competent authorities, Vetrerie Riunite S.p.A. undertakes:

- Not to offer employment and/or commercial opportunities to the personnel of the public authority involved in the relationship or in the audits/inspections/checks, or to their relatives, unless at least one year has elapsed since they have ceased to be a public sector employee;
- Not to offer, directly or indirectly, complimentary items, gifts or anything else of value to public sector personnel, or their relatives, except for acts of business courtesy of moderate value and in any case within the value limits laid down;
- Not to influence the decision-making autonomy of another subject in charge of managing relations with public sector personnel;
- Not to solicit or obtain confidential information that compromises the integrity or reputation of both parties.

In relations with public authorities, it is forbidden for representatives and/or employees of Vetrerie Riunite S.p.A. to pay or offer, directly or through third parties, sums of money or other benefits of any type or entity, to public officials or persons responsible for public service, government representatives or public service employees that Vetrerie Riunite S.p.A. entertains relations with, as remuneration or repayment for an act that is already their duty or that is contrary to their duty.

Moreover, such behaviour is strictly forbidden for the purposes of favouring or damaging a party in civil, criminal or administrative proceedings, or procuring a direct or indirect advantage for the company.

Acts of business courtesy, such as complimentary items, forms of hospitality or any other benefits (including donations) are only permitted if designed to promote the image of Vetrerie Riunite S.p.A., and only if of moderate value, which form part of the normal practice in relations, within

the limits provided for by the specific Procurement Procedure and when they do not compromise the integrity and reputation of the parties, and conform to adopted uses; such acts must not be interpreted, by an impartial third party, as acts intended to improperly obtain advantages and favours. In any case, such acts must always be authorised and adequately documented.

Should employees of Vetriere Riunite S.p.A. receive explicit or implicit requests for benefits of any kind from public authorities or from natural or legal persons who act for or on behalf of public authorities, they must immediately suspend all relations and inform their superior.

The above provisions must not be circumvented by resorting to other forms of aid and contributions which, under the guise of appointments, consultancies, advertising, sponsorship, representation expenses, etc., have similar purposes to those prohibited in this section.

Vetriere Riunite S.p.A. also prohibits its employees and collaborators from:

- Using or presenting false declarations or documents and/or false statements, or omitting information to obtain, for the benefit or in the interests of the company, grants, loans or other disbursements, however named, issued or disbursed by the State, a public body or the European Union.
- Deliberately misleading individuals belonging to the disbursing body into error through ploys aimed at unduly obtaining for the company, grants, loans or other disbursements, however named, issued or disbursed by the State, a public body or the European Union.
- Using grants, loans or other disbursements, however named, issued or disbursed by the State, a public body or the European Union for purposes other than those for which they were granted.

Relations with competitors

The management of business and business relations is guided by the principles of loyalty, legality, fairness, transparency, efficiency and openness to national and international markets. The activities of Vetriere Riunite S.p.A. and the behaviour of its employees, administrators, managers and collaborators must be characterised by total autonomy and independence from the conduct of competitors in the domestic and foreign markets.

Protection of privacy

Personal information and data are acquired, processed and stored according to specific procedures aimed at preventing unauthorised persons and/or bodies from gaining knowledge of the same. Such procedures conform to the laws in force; in particular, Vetriere Riunite S.p.A. ensures compliance with the provisions of European Regulation 2016/679 and subsequent amendments and additions.

Implementing instruments of the Code of Ethics

Circulation and training

The document is freely accessible at the website www.vetrieriunite.it/en and is published on the company intranet in the folder **U:\Procedure Aziendali di Gruppo**.

As regards external collaborators and any other addressee, specific contractual clauses are established to formalise the commitment to observe the Code of Ethics.

Vetriere Riunite S.p.A.

Managing Director

(Luca Matteo Villa)