



Whistleblowing Procedure

- Management of Reports -

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1. The Zignago Vetro Group - Introduction

Zignago Vetro S.p.A. ("Zignago Vetro" or the "Company") heads a leading Italian and European Group (the "Group") in the production and sale of hollow glass containers.

In pursuing their business objectives, Zignago Vetro and the Group companies are committed to combatting unlawful conduct at every level of employment, both by disseminating and promoting ethical values and principles, and by effectively enacting rules of conduct and control processes, in line with the requirements set out in applicable regulations and relevant best practices. Compliance with laws and rules of conduct are core values within the Group.

Through this **Whistleblower Policy**, Zignago Vetro and the Group companies, in line with international Best Practices, undertake to encourage and protect employees who disclose any cases of fraudulent behaviour discovered in the course of their work and professional activities.

The Group, committing with its stakeholders to the highest integrity and fairness in business management, intends to cultivate a corporate culture in which all employees are able to report serious negligence or fraudulent behaviour without fear of repercussions.

Zignago Vetro is keenly aware that employees who make correct use of the Whistleblowing policy help the Group to better protect and manage its reputational risks and to preserve its long-term value.

Zignago Vetro and the Group companies have developed corporate protocols and control measures to eliminate or minimise the risk that crimes are committed in the performance of all those daily activities that are potentially more vulnerable to the occurrence of unlawful conduct. This respect applies to all Group employees, regardless of seniority, position held, place of employment or nationality.

2. Regulatory framework

On March 30, 2023, Legislative Decree No. 24 of March 10, 2023 (the "Decree"), entitled "*Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of October 23, 2019 (the "Directive") on the protection of persons reporting violations of EU law and laying down provisions regarding the protection of persons reporting violations of national regulatory provisions,*" came into force. This introduced a new system for reporting violations, providing common rules for public and private entities.

The aforementioned Legislative Decree No. repealed Law No. 179 of 2017 on "Provisions to protect the authors of reports of crimes or irregularities of which they have become aware as part of a public or private employment relationship." It was therefore necessary to revise this policy to ensure it complies with requirements of the new regulation.

The Directive in question seeks, on the one hand, to guarantee freedom of expression and information - which includes the right to receive or impart information and media freedom and pluralism - and, on the other hand, to counter (and prevent) corruption, maladministration, and to prevent Violations of Law in the

public and private sectors.

Whistleblowers provide information that may lead to investigation, detection, and prosecution in the event of violations, thereby strengthening the principles of transparency and accountability in democratic institutions.

3. Objective

This policy is designed to govern the process for Reporting Violations in accordance with the provisions of Legislative Decree No. 24/2023. It therefore provides all the necessary indications to enable interested parties to Report - including anonymously - Violations of national and/or European regulations, and conduct that violates the Organisational Model and/or the Code of Ethics pursuant to Legislative Decree No. 231/01.

The policy therefore seeks to ensure that the Group's operations comply with the aforementioned regulatory requirements, defining the means of handling reports to protect the confidentiality of the Whistleblower and persons other than the Whistleblower (such as the Facilitator or persons mentioned in the Report) and the content of the Report.

Specifically, the policy seeks to:

- provide guidance on who can make reports;
- indicate the potential subjects of Reports;
- define the available reporting channels;
- regulate the internal reporting channel, identifying the individuals designated to receive internal reports and setting out the timeframe and means for handling them to verify their content;
- indicate the measures in place to protect the Whistleblower, in accordance with current regulations;
- specify the Whistleblower's expected liability and the protection of the reported party's rights;

This policy does not affect the periodic information flows to the Supervisory Board, as regulated in the general part of the Organisational Model adopted by the Company and its Italian subsidiaries pursuant to Legislative Decree No. 231 of 2001.

In order to promote the culture of transparency and fairness within the Company and in its daily operations, Zignago Vetro encourages all employees to be aware of and consequently comply with the corporate Protocols, requiring compliance and providing for appropriate disciplinary measures in the event of non-compliance.

Prevention and control over the actions performed are the responsibility of all employees and not just the bodies delegated to do so by law or in line with the Company's internal organisation. Zignago Vetro therefore encourages reporting by any person - including its own personnel, partners, suppliers, contractors, customers and third parties - who becomes aware of possible violations of Company Protocols and/or the Law and/or Regulations.

4. Definitions

For the purposes of this policy, as stated in Article 2 of the Decree, the following definitions shall apply:

- a) **“Violations”**: behaviour, acts or omissions that harm the public interest or the integrity of the public administration or a private entity, consisting of:
- 1) illegal conduct under Legislative Decree No. 231. of June 8, 2001, or Violations of the organisation and management models provided therein, which do not fall under points 3), 4), 5) and 6) below;
 - 2) unlawful acts falling within the scope of the European Union or national acts specified in the Annex to the Decree, or national acts that constitute implementation of the European Union acts specified in the Annex to Directive (EU) 2019/1937, even if not specified in the Annex to the Decree, relating to the following areas: public procurement; financial services, products, and markets and prevention of money laundering and funding terrorism; product safety and compliance; transportation safety; environmental protection; radiation protection and nuclear safety; food and feed safety and animal health and well-being; public health; consumer protection; privacy and data protection; and network and information system security;
 - 3) acts or omissions that harm the financial interests of the Union referred to in Article 325 of the Treaty on the Functioning of the European Union specified in the relevant secondary EU legislation;
 - 4) acts or omissions concerning the domestic market, as per Article 26, paragraph 2 of the Treaty on the Functioning of the European Union, including Violations of European Union competition and state aid rules, in addition to Violations concerning the domestic market relating to acts that violate corporate tax rules or mechanisms to obtain a fiscal advantage that impinges on the object or purpose of the applicable corporate tax law;
 - 5) acts or conduct that impinge on the object or purpose of the provisions set out in EU Acts in the areas described in points 3), 4) and 5) above;
- b) **“Information concerning Violations”**: information (including well-founded suspicions) regarding Violations committed or which, on the basis of concrete elements, could be committed within the organisation with which the Reporting Person or the person making the complaint to the Judicial or Accounting Authority has a legal relationship as per Article 3, paragraph 1 or 2, of the Decree, in addition to elements concerning behaviour designed to conceal such Violations;
- c) **“Report” or “Reporting”**: the written or oral communication of Information concerning Violations;
- d) **“Internal Reporting”**: the written or oral communication of Information concerning Violations submitted through the Internal Reporting channel referred to in Article 4 of the Decree;

- e) “Reporting Person” or “Whistleblower”: the natural person who reports the Information concerning Violations acquired within his or her Work Environment;
- f) “Facilitator”: the natural person who supports a Whistleblower in the Reporting process, operating within the same Work Environment and whose assistance must be kept confidential;
- g) “Work Environment”: the work or professional activities, present or past, carried out as part of the relationships referred to in Article 3, paragraphs 3 or 4, of the Decree, through which - regardless of the nature of such activities - a person acquires Information concerning Violations and because of which s/he could risk retaliation if s/he makes a Report or a complaint to the judicial or financial authorities;
- h) “Person Involved”: the natural or legal person mentioned in the Report as the person responsible for the Violation or as a person otherwise implicated in the Violation reported or publicly disclosed;
- i) “Retaliation”: any behaviour, act, or omission - even if only attempted or threatened - carried out as a result of the Report which causes or may cause the Whistleblower or the person making the Report unjust harm, whether directly or indirectly;
- j) “Follow-up”: the action taken by the person responsible for managing the Reporting channel to assess the existence of the events reported, the outcome of the investigation, and any measures taken;
- k) “Acknowledgement”: communication to the Whistleblower of information regarding the Follow-up that is given or intended to be given to the Report;
- l) “Whistleblowing Management Committee” or “WMC”: a collegial body comprising independent and impartial individuals, responsible for receiving and managing Whistleblowing Reports through the Internal Channel.

5. Scope of application and addressees

5.1. Subjective scope - persons who can make reports

The Whistleblower is the natural person who reports the Information concerning Violations acquired within his or her Work Environment.

In compliance with the regulations, this policy therefore applies to individuals who maintain working relationships with the Company, even temporarily or where they do not have the status of employees. It also applies, albeit under certain conditions, to those who do not yet have a legal relationship with the Company (in pre-contractual negotiations), and those whose relationship has ended or who are in a probationary period.

Protection is, likewise, accorded not only to the aforementioned persons who make reports or complaints, but also to those persons other than the Whistleblower who could nevertheless suffer retaliation, even indirectly, as a result their role in the process of Reporting or making a complaint and/or the particular

relationship that binds them to the Whistleblower or complainant.

Pursuant to Article 3, paragraph 5 of the Decree, the protective measures also apply:

- *to the Facilitator*: the natural person who supports the Whistleblower in the reporting process, operating within the same Work Environment and whose assistance must be kept confidential;
- to persons in the same Work Environment as the Whistleblower or complainant or who are related to them by a stable emotional or kinship relationship to the fourth degree;
- to co-workers of the Whistleblower who work in the same Work Environment and who have a frequent and ongoing relationship with that person. This refers only to activities carried out in the present, not to past activities;
- to entities owned by the Whistleblower or for which those same persons work, and entities operating in the same Work Environment as those persons.

5.2. Objective Scope

5.2.1. Report content

Reports and complaints deal with Information concerning Violations of Specific National and European Union Regulations.

The information may relate either to Violations committed or to those not yet committed that the Reporting Person - on the basis of concrete evidence - reasonably believes could be committed, relating to alleged wrongdoing and/or non-compliance with legal, regulatory, statutory and/or company rules.

5.2.2. Elements and characteristics of reports

Reports must be made in good faith, be well-founded or at least based on factual evidence, and be as fully substantiated as possible, to allow those responsible for receiving and handling them to ascertain the facts. The Whistleblower must therefore be able to:

- accurately (clearly and completely) describe the event being reported;
- provide personal details or other elements enabling of the person(s) who has/have carried out the reported facts to be identified, along with any other persons involved and/or who may report on the event(s) being reported;
- describe the time and place in which the event being reported occurred.

It is also useful to attach documents to provide evidence of the events being reported, along with an indication of any other persons potentially aware of the facts.

5.2.3. Anonymous reports and their handling

Reports that do not allow the Whistleblower to be identified are considered anonymous.

Anonymous reports have equal weight as ordinary reports, if they are substantiated, and are therefore admissible as information to allow investigations to begin. The above principles of protection for the Whistleblower (if later identified) and the reported person remain valid and unaffected.

Such reports may not be considered if they are not sufficiently detailed and/or accurate.

5.3. Reporting channels and how to submit reports

Violations may be reported using a number of channels, under the conditions expressly defined in Legislative Decree No. 24 of 2023 and referred to therein.

This policy governs how to make a Report through an internal channel.

5.3.1. Reporting procedure using an internal channel

Zignago Vetro has established a special encrypted internal channel for the sending and handling of Reports. This channel guarantees the confidentiality of the Whistleblower, the Facilitator, the Person Involved or other persons mentioned in the Report, in addition to the content of the Report and related documentation.

Reports may be made:

- in writing by one of the following means:
 - by regular post by sending a written statement in a sealed envelope to Viale Ita Marzotto, 8, 30025 Fossalta di Portogruaro (VE) - Whistleblowing Management Committee (or WMC) (specifying on the envelope “CONFIDENTIAL - TO THE WHISTLEBLOWING MANAGEMENT COMMITTEE”). To ensure the confidentiality required by the regulations and considering the confidential protocolling of the Report by the WMC, the Report must be placed inside two sealed envelopes: the first containing the Whistleblower’s identifying data and a copy of a valid identity document; the second containing the Report, marked “WHISTLEBLOWER.” This ensures that the identifying data of the Whistleblower remains separate from the Report and avoids accidental opening by other parties. The envelope is delivered unopened to the WMC by the designated staff. The Report is then confidentially protocolled by the WMC, including through the use of autonomous registering;
 - by computer, using the messaging systems accessed directly through the specific platform available on the home page of the Company’s website www.zignagovetro.com, using the following link: <https://zignagovetro.segnalazioni.net>.
- orally:

- through a face-to-face meeting with the WMC, upon express request by the Whistleblower sent through one of the channels indicated above (regular mail or web platform). These meetings will be scheduled within a reasonable timeframe and by appointment. An oral Report must be acknowledged in written form (minutes signed by the Whistleblower) or audio recording, subject to the prior consent of the Whistleblower, by which it may be listened to later, to allow the investigation to be properly managed and the information communicated to be adequately archived and preserved;
- using the voice messaging system available on the IT platform dedicated to whistleblowing reports. The Whistleblower's voice will be rendered unrecognisable by a built-in voice distortion system. Reports received through the voice messaging system, subject to the consent of the Whistleblower, is documented through recording on the platform.

For Zignago Vetro S.p.A., the platform is the priority channel

Once a Whistleblower has logged in to the Internet platform, they simply click on the appropriate "WHISTLEBLOWING" button, which allows them to insert their Report.

For Reports made electronically, the following precautions are taken:

- the Report is received by one person outside the company (the WMC);
- separation between the Report's content and the identity of the Whistleblower (if given);
- the Whistleblower's identity is known only to the external party that manages the channel;
- management of the Report (not containing the Whistleblower's identity) is carried out by the WMC.

In order to encourage widespread use of the channel, the channel accepts anonymous reports, provided that these are substantiated and are not merely intended to be defamatory. In order to facilitate the investigative phase, however, Zignago Vetro encourages named reports, underlining that management methods have been designed to ensure maximum confidentiality for the Whistleblower, in full compliance with current regulations.

For the Report to be successfully followed up, the mandatory fields must be completed.

The platform used enables any documents supporting the existence and substantiation of the facts subject to the Report to be attached.

Confidentiality is further guaranteed where reports are made using a personal electronic device.

Once the Report is submitted, the Whistleblower receives a unique identification code that is randomly and automatically generated by the IT platform. This enables him or her, while remaining anonymous, to access his or her Report, stay in contact with the entity charged with managing Reports, find out about the outcomes, and provide clarifications or further documentation;

The communication, from whatever alternative instrument it comes from, must in every case contain the following information:

- information regarding the Whistleblower (first and last name, e-mail address and telephone number), except in event of anonymous Reports;
- company at which the event occurred;
- an indication that this is a Report whose author seeks to remain confidential and benefit from the protections provided in the event of any retaliation suffered as a result of the Report;
- a detailed description of the events;
- the category of the Whistleblower (e.g. employee, former employee, candidate, freelancer/consultant, worker/contractor in an enterprise providing goods or services that performs work for third parties, volunteer/trainee, other) or, alternatively, the express desire not specify this information;
- the type of violation (the regulation violated) or, alternatively, the fact that the conduct or events reported cannot be connected to a specific regulatory case;
- the perpetrator(s) of the violation (first name, last name, role/assignment);
- the place (department, function, office, etc.) where the event, act or omission occurred;
- the date (even presumed) when the event, act or omission occurred;
- the express provision to disclose the Reporter's identity to persons other than those in charge of receiving the Report, where necessary in following up the Report.

The body responsible for receiving any reports, after assessing the relevance and size of the alleged violation, may decide to interview any of the parties involved or to consult Zignago Vetro top management through the Chief Executive Officer, except where s/he is the subject of the Report, while the protection of confidentiality remains guaranteed.

Reports to the WMC, must be made via the following link:

<https://zignagovetro.segnalazioni.net>

5.4. Person responsible for handling reports through the internal channel and procedural process

The management of Reports made through the internal channel is entrusted to a **WMC comprising** independent and impartial individuals who are qualified to carry out the required activities. Specifically, these are:

- **The Director in charge of the Whistleblowing System (chosen by the Board from among the Independent Directors);**

- **One member of the Board of Statutory Auditors (designated by the Board).**

Other employees and/or consultants may be involved, at the request of WMC members, including severally. If the irregularity reported relates to one of the members of the WMC, access will be restricted exclusively to the other member.

If the Internal Report is mistakenly submitted to parties other than those identified and authorised above, but who are at any rate aware of this policy, those parties must forward the Report to the appropriate parties within seven days of receiving it.

If the Report relates to the Organisation and Control Model adopted by the Company pursuant to Legislative Decree No. 231/2001, the Report will be forwarded by the WMC to the members of the Supervisory Board.

The investigation phase is managed by the WMC on the basis of predefined timelines:

- notice that the Report has been received, along with acknowledgement sent to the Whistleblower through the Platform: within seven days of receipt (Acknowledgement of receipt may be sent only to non-anonymous users who have provided at least one contact channel. For reports made through the IT platform only, the Whistleblower - even when anonymous - will still be able to monitor the progress of the investigation).
- Identification of the type of Report and evaluation of whether to convene (by email) company contact persons by area of expertise, following assessment of potential conflicts of interest;
- in concert with the relevant contact persons, preliminary verification and launch of the investigation with first-level assessments and verifications: within fifteen working days of the date of receipt of the Report;
- report on the outcome of this initial investigation: within three months of the date of the Report (outcomes must be included on the Platform so that they are visible to the Whistleblower) and proposal of possible solutions (continuation of the investigation, request for further investigations, etc.)

Where possible and deemed necessary, the WMC may invite the Whistleblower for a face-to-face discussion to assess the veracity and substantiation of the Report, and to obtain support to further the investigation. It may also request inspections or additional documentation for this purpose.

Deadlines to complete the investigation may only be extended by formal and reasoned WMC resolution.

If the Report was made through an IT platform, the Whistleblower will be able to monitor the status of the investigation in real time. For Reports made by post, the Whistleblower will receive updates on the status of the investigation (intake, filing, and action taken) only if the Report contains a valid e-mail address.

The WMC reports its findings to:

- The Board of Statutory Auditors, the Supervisory Board, and the Control, Risks and Sustainability Committee;
- The Board of Directors, the Board of Statutory Auditors, the Supervisory Board and the Control, Risks

and Sustainability Committee in the most serious cases or where the Report concerns a Director, Statutory Auditor or violation of the Organisation and Management Model adopted by the Company pursuant to Legislative Decree No. 231/2001.

In this event, the collegial entities to which the WMC reports decides how to proceed and which relevant functions to involve in the process.

Semi-annually, the WMC submits a summary of reports handled (filed and investigated) to the Board of Directors, which includes details regarding the application (or lack thereof) of disciplinary action.

Semi-annually, the WMC submits a summary of reports handled (filed and investigated) to the Supervisory Board, which includes details regarding the application (or lack thereof) of disciplinary action. The disclosure also provides essential information that is useful in assessing the possible existence of violations of the Organisational Model pursuant to Legislative Decree No. 231/2001.

Semi-annually, the Internal Audit department verifies that the Platform is functioning correctly by including a Test Report, and proposes corrective action where necessary.

Where a Report is found to be manifestly groundless because of an absence of factual elements to justify its investigation, or in the event that the Report contains a generic description of wrongdoing such that it does not allow the events to be fully understood, or in the event of a Report of wrongdoing accompanied by inappropriate or irrelevant documentation, the **WMC** may decide to dismiss the Report, promptly notifying the Whistleblower.

All reports received and documentation pertaining to the related investigative activities are kept in special files managed by the **WMC**, in compliance with provisions on confidentiality and privacy.

In this regard, we note that:

- personal data are processed in compliance with the requirements of EU Regulation 2016/679 on privacy, through the use of appropriate technical and organisational measures to ensure adequate security levels, **based on an impact assessment of the obligations imposed by Article 13 of the aforementioned Legislative Decree No. 24 of 2023;**
- regular mail and the whistleblowing IT platform also enable the Whistleblower to make reports anonymously, i.e. without having to reveal his or her identity and without the recipient being able to discover it;
- specifically, we note that access to the whistleblowing platform through the Zignago Vetro website **is subject to a “no-log” policy:** this means that access to the whistleblowing platform made through the corporate website ensures confidentiality and anonymity (if desired), but access should NOT be made from a computer connected to the Zignago Vetro corporate network, since this is tracked by corporate information systems to guarantee and protect corporate security.

The website for accessing the platform also contains additional practical guidance on the proper use and

operation of the platform.

In all cases, anonymous reports will be handled provided that they are sufficiently substantiated and to such an extent as to allow them to be appropriately investigated.

5.5. Means of ascertaining and handling Internal Reports

Members of the WMC handle reports in compliance with the principles of confidentiality, using the following methods to check that they are substantiated:

WMC members review internal reports received and take every step deemed necessary to ascertain whether (or not) the reports are well-founded.

When, at the request of the Whistleblower, the Report is made orally at a meeting with WMC, it - with the consent of the Whistleblower - be documented by the personnel in charge. This is done either by recording the Report on a device that allows it to be stored and listened to, with the prior consent of the Reporter, or in the form of minutes. Where minutes are taken, the Whistleblower may verify, correct and confirm the minutes of the meeting with his or her own signature.

In every case, the members of the WMC note the Report received in a special register of Reports, (the "**Reports register**"), established in digital format and accessible only to them.

For Reports made through the IT platform, the system automatically generates a numeric code associated with each Report ("ticket"), which is valid as confirmation that the Report has been received. Whistleblowers choosing to use the IT platform may at any time, through the use of their ticket, access the platform to check for updates on the status of the Report and/or supplement it with any additional information, including by exchanging messages with the members of the WMC (**also anonymously when using the computer platform in anonymous mode**).

The Whistleblowing section of the IT platform is the preferred channel for anonymous reports, as it enables a two-way communication channel even when the Whistleblower's identity is not known. Communication with the Whistleblower is useful for requesting any further details to better substantiate the Report's content, thereby facilitating investigation activities. Any communication between the recipient and the Whistleblower receives the same confidentiality protections afforded to the main Report.

Whistleblowers who initially used the IT platform choosing to remain anonymous may, during the following stages, reveal his or her identity - if he or she has changed his or her mind - by providing it in the message chat.

Specifically, following the verifications, the members of the WMC prepare a report on the activities carried out and, in the event of unfounded reports, promptly notify the Whistleblower and the Supervisory Board (if previously involved). It then archives the Report, recording the reasons for doing so in the "Reports Register".

In the event of manifestly unfounded reports made solely to discredit one or more persons or company

functions or the Company and/or otherwise harass other company employees, the members of the WMC - in agreement with the Control, Risks and Sustainability Committee of Zignago Vetro S.p.A. or of the company concerned - shall, through the Human Resources function, begin the procedure to impose a sanction against the author of the aforementioned unfounded reports, in compliance with current labour laws and the applicable National Collective Bargaining Agreements. It may also adopt all the measures deemed most appropriate from time to time, not excluding - where the prerequisites are met - potential reporting to the competent Judicial Authority. In the event, however, that the WMC finds that the Report was made in good faith, it may decide not to impose any Sanction.

In the event that, as a result of the investigations carried out, the Report is well-founded (or otherwise appears to be so), the members of the WMC shall promptly notify the following parties:

1. the Company's Supervisory Board, if the event relates to the 231 Decree;
2. the Chief Executive Officer/Legal Representatives of the companies concerned;
3. The Board of Statutory Auditors and the Control, Risks and Sustainability Committee of Zignago Vetro S.p.A.;

so that they can consider an action and/or intervention plan.

Reports and alerts received by WMC members are accessible only to them - and to the individuals (as indicated above) involved by them in the subsequent verification and assessment process - and are retained for the period of time strictly necessary to allow the Report to be handled. The members of the WMC are therefore responsible, at each stage of the process described above, for safeguarding the documentation they receive and for storing it in such a way as to ensure its integrity and completeness.

5.5.1. External reporting

The Reporter may also make a Report, for offenses that fall within the scope of application of the European Union or national acts indicated in the annex to the Decree, through the channel established by the ANAC (so-called «External Reporting») exclusively if, at the time of the Report, one of the following conditions applies:

1. the Whistleblower has already made an Internal Report pursuant to the above and it has not been followed up;
2. the Whistleblower has reasonable grounds to believe that, if he/she made an Internal Report, it would not be followed up effectively (for example: conflict of interest of all members of the committee...), or that the Report itself could lead to the risk of Retaliation;
3. the Reporter has reasonable grounds to believe that the Violation may constitute an imminent or obvious danger to the public interest.

In the absence of at least one of the above conditions, the Reporter will not be able to activate the External Reporting channel.

Like the Internal Reporting channel, the External Reporting channel activated by ANAC also guarantees the confidentiality of the identity of the Reporter, the Facilitators, the Person Involved, the other people mentioned in the Report, the content of the Report itself and the related documentation. The same confidentiality is guaranteed even when the Report reaches subjects other than those responsible for processing the Reports, to whom it is in any case transmitted without delay.

External Reports can be made through the channels specifically set up by ANAC:

- IT platform on the ANAC institutional website, by clicking the link to the dedicated page, you access the service dedicated to “whistleblowing” (<https://www.anticorruzione.it/-/whistleblowing>).
- Oral reports.
- Direct meetings set within a reasonable time.

6. Protections

The protection system provided under Legislative Decree No. 24/2023 guarantees the following types of protection:

1. protection of the confidentiality of the Whistleblower, the Facilitator, the Person Involved and the persons mentioned in the Report;
2. protection from any retaliatory measures taken by the Company as a result of the Report or complaint made;
3. liability limitations regarding the disclosure and dissemination of certain categories of information.

Waivers and settlements, whether full or partial, of the rights and remedies listed above are not valid in general. This does not apply to waivers and settlements signed in protected contexts (judicial, union management).

6.1. Protection of confidentiality

6.1.1. Protection of the Whistleblower’s confidentiality

The members of the WMC (and any others who may be involved in the process) ensure the Whistleblower’s strictest confidentiality, protecting his or her identity.

Except in cases where confidentiality is not enforceable by law (e.g., criminal, tax and/or administrative investigations, inspections by Control Authorities), the Whistleblower’s identity and any other information from which it may be directly or indirectly inferred, may not be disclosed without the

Whistleblower's express consent to persons other than those responsible for receiving or following up the reports.

In cases where disclosure of the Whistleblower's identity and related information is indispensable, including for the defence and protection of the person charged with the disciplinary charge or the Person Involved, in addition to the Whistleblower's consent, s/he must also receive express written notice of the reasons for the disclosure of their confidential data.

Violation of the confidentiality obligation entails disciplinary responsibility, without prejudice to further responsibilities provided for by law.

6.1.2. Protection of the confidentiality of Reported Persons and others

The tools and procedures adopted by the Company in handling Reports guarantee the protection of the identity of the reported person and other persons involved or mentioned in the Report. This guarantee lasts until the conclusion of the proceedings that began as a result of the Report and in compliance with the same guarantees provided for the Whistleblower.

6.1.3. Processing of personal data

The acquisition and management of reports or complaints, including communications between the relevant authorities, is conducted in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR), Legislative Decree No. 196 of June 30, 2003.

Personal data related to receiving and managing the Report is processed by Zignago Vetro and the Group companies, each individually, as Data Controllers, in accordance with the principles set out in Articles 5 and 25 of the aforementioned EU Regulation 2016/679.

In the event that data protection regulations are violated by authorised persons or data controllers, the responsibility lies with the data controller or data processor under whose direction those persons operated.

Interested parties may view the information pursuant to articles. 13 and 14 of Regulation (EU) 2016/679 dedicated to them at the address <https://zignagovetro.segnalazioni.net/>.

According to the provisions of the art. 2-undecies Legislative Decree 196/2003, the Person Involved and/or mentioned in the report, with reference to their personal data processed in the context of the Report, cannot exercise the rights that Regulation (EU) 2016/679 normally recognizes to interested parties (the right of access to personal data, the right to rectify them, the right to obtain their cancellation or so-called right to be forgotten, the right to limit processing, the right to portability of personal data and the right to object to processing). This is because the exercise of these rights could result in an effective and concrete prejudice to the protection of the confidentiality of the identity of

the Reporter.

In such cases, the Person Involved and/or mentioned as an interested party in the processing may exercise the aforementioned rights by contacting the Guarantor Authority for the Protection of Personal Data, in the manner provided for by the art. 160 of Legislative Decree 196/2003. In this case, the Guarantor for the Protection of Personal Data informs the interested party that all the necessary checks have been carried out or a review has been carried out, as well as the interested party's right to lodge a judicial appeal.

6.1.3.1. Retention of documentation relating to the Report

All documentation (electronic and hard copy) produced that is kept by the Report Handler will and must be made available upon request to the Shareholders, Board of Directors, Board of Statutory Auditors, and Supervisory Board.

Internal and external Reports and related documentation are held for as long as strictly necessary to process the Report, but not longer than necessary to follow up on the Report. In the event that the Report is deemed worthy of further company attention, and in accordance with the Data Retention policy regarding Personal Data Protection, the Report and related documentation shall be kept for a maximum of five years from the date that the final outcome of the Reporting procedure is announced. This conservation complies with the confidentiality obligations under Article 12 of Legislative Decree No. 24/2023 and the principle set out in Article 5, paragraph 1, letter e) of Regulation (EU) 2016/679.

Where the Report leads to legal proceedings, the time limit will be extended until the conclusion of those proceedings.

Where the Report is made using the recorded voice messaging system, with the consent of the Whistleblower, the Report shall be documented by the WMC by recording it on a device suitable that allows it to be listened to or by verbatim transcription. Where a transcription is made, the Whistleblower may verify, correct and confirm the transcription meeting with his or her own signature.

When, at the request of the Whistleblower, the Report is made orally at a meeting with the Report Handler, it shall - with the consent of the Whistleblower - be documented by the Report Handler. This is done either by recording the Report on a device that allows it to be stored and listened to or in the form of minutes. Where minutes are taken, the Whistleblower may verify, correct and confirm the minutes of the meeting with his or her own signature.

6.1.4. Protection from retaliation

The Company will not tolerate threats or any behaviour, act or omission - even if only attempted or

threatened - carried out because of the Report, in relation to unlawful conduct and/or non-compliance with the European and/or national regulations, previously referred to and/or civil, criminal, accounting and disciplinary offences, in addition to Violations of the Organisational Model or events constituting offences under Legislative Decree No. 231/2001, and which directly or indirectly cause or may cause unjust harm to the Whistleblower or the person making the Report.

Actions performed in violation of the prohibition against Retaliation are null and void.

A Whistleblower who believes that s/he has suffered a retaliatory and/or discriminatory act as a result of the complaint made may notify their supervisor and/or the WMC for an evaluation of:

- the need/possibility of having the situation restored and/or the negative effects of discrimination remedied;
- the existence of grounds to begin disciplinary proceedings against the perpetrator of the Retaliation and/or discrimination.

6.1.5. Limitations of liability for the whistleblower or complainant

Whistleblowers or complainants who reveal Violations of information covered by the obligation of official secrecy, professional secrecy, scientific and industrial secrets, duty of faithfulness and loyalty, in addition to Violations of the provisions on copyright protection, personal data protection, or who reveal or disseminate Information concerning Violations that harm the reputation of the Person Involved or reported, do not incur any kind of civil, criminal, administrative or disciplinary liability in connection to the offences committed, if:

- at the time of the disclosure or dissemination, there are reasonable grounds to believe that disclosure or dissemination of the information is necessary to reveal the violation;
- the Report is made under the same conditions as those provided for the protection of the Whistleblower, as set out in Section 6.1.1 above.

7. Responsibilities of the Whistleblower

All Whistleblowers - even anonymous ones - are responsible for making reports in good faith and in line with the spirit of this policy: reports that are manifestly unfounded, opportunistic, and/or made for the sole purpose of harming the reported person or subjects otherwise affected by the Report are not taken into consideration and, as set out above, will be subject to sanctions and/or action before the competent Judicial Authority.

To protect the dignity, honour and reputation of all involved, Zignago Vetro is committed to offering maximum protection from defamatory reports.

If, following the Report verification phase, the Report is deemed to be unfounded and the Whistleblower

deemed guilty of intentional wrongdoing and/or gross negligence, Zignago Vetro will take the appropriate measures to protect itself and its employees.

8. Rights of the reported party

The subjects of Reports may be involved in the process of verifying and ascertaining unlawful conduct and Violations that may be Reported, but under no circumstances will sanction proceedings begin against them on the basis of the Report in the absence of concrete findings relating to its content.

9. Sanctions

The following are liable for sanctions:

- i. a Whistleblower making Reports with malice or gross negligence or which are found to be false, unfounded, include defamatory content or are otherwise made for the sole purpose of harming the Company, the reported party or others affected by the Report;
- ii. any person who violates the Whistleblower's confidentiality;
- iii. any person responsible for acts of Retaliation;
- iv. any person who obstructs or attempts to obstruct the Report.

10. Dissemination of the policy

This policy is disseminated to all personnel (contractors and/or employees) and Corporate Bodies.

For this purpose, it is also published on Zignago Vetro's website at the following address:

www.zignagovetro.com.

**INFORMATION ON THE PROCESSING OF PERSONAL DATA
OF PERSONS REPORTING VIOLATIONS OF EUROPEAN UNION LAW OR NATIONAL REGULATORY PROVISIONS, OF THE
PERSONS INVOLVED, OF THE PERSONS MENTIONED AND OF THE FACILITATORS**

Zignago Vetro S.p.A., as the data controller of personal data (hereinafter referred to as "Zignago Vetro"), issues this notice to the reporting person, the persons involved, the persons mentioned, and the facilitators in compliance with the European and Italian regulations on the protection of personal data.

Zignago Vetro S.p.a. has appointed a data protection officer (DPO), who can be contacted by writing to the following address: dpo@zignagovetro.com.

Purposes and legal basis of processing.

Zignago Vetro processes personal data for the purpose of carrying out the necessary investigative activities aimed at verifying the merits of the reported event and taking the consequent measures.

Consent is not required because the processing is necessary for Zignago Vetro to fulfil its regulatory obligations under Legislative Decree No. 24 of March 10, 2023.

Categories of data and their sources.

Zignago Vetro processes data of a common nature (first name, last name, contact data, qualification, etc.), data of a particular nature (data relating to health, trade union membership, etc.) and/or data relating to criminal convictions, offenses and security measures: this information may be collected directly from the person to whom it refers (hereinafter "Interested Party") and/or from third parties (e.g. when the reporting person provides information on the person involved and/or other persons mentioned and/or the facilitator, or when additional information/documents are acquired *ex officio* from other structures of Zignago Vetro in the course of the investigation).

Retention period of collected data.

The collected data are kept for the time necessary for the processing of the report and for the period necessary for the completion of the related administrative procedure or any case brought, and in any case not more than 5 years from the date of the communication of the final outcome of the reporting procedure.

Nature of data provision and consequences in case of refusal.

The provision of personal data is optional, but necessary for the handling of reports and related activities, with the consequence that any refusal to do so will prevent the company from proceeding in this regard.

Recipient categories.

When managing the report, personal data may be processed by internal figures specifically authorised for the purposes indicated, as well as by companies offering hosting/management services for technological platforms, professionals involved in the management of reports, who will process the data as data controllers on behalf of Zignago Vetro.

Where required, personal data may be sent to third parties to whom communication is required by law (e.g. Judicial Authority, National Anti-Corruption Authority, etc.).

Under no circumstances will personal data be disseminated.

Data transfer to a third country and/or international organisation

Personal data are not transferred either to non-European third countries or to international organisations.

Rights of the interested parties.

The Interested Parties have the right to obtain access to their personal data, the updating (or rectification, if inaccurate), the cancellation of such or the limitation of the processing that concerns them, when the respective prerequisites are met and in particular within the limits of the provisions of Article 2-undecies of Legislative Decree No. 196/2003.

To exercise their rights, the interested party may use the form available at the link <https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924> and forward it to the CGSW, contacting it through the channel used for reporting, i.e. at Zignago Vetro, with registered office at Via Ita Marzotto, 8 - 30025 Fossalta di Portogruaroful (VE). The Interested Party also has the right to lodge a complaint with the relevant supervisory authority, the Guarantor for the protection of personal data (www.garanteprivacy.it).