Approved by Top Management on 14th of February 2023

SUSTAINABILITY 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.

For Guala Closures Group, operating in a sustainable way means: creating value for the parties concerned (stakeholders), using resources so that the needs of future generations are not compromised, respecting people, the environment, and society as a whole.

We create economic, social and environmental value for the benefit of all our stakeholders and thus contribute to strengthening the performance of our Group and Customers.

According to the 10 principles established by the UN Global Compact and with the contents of the "Code of Ethics and Conduct", the **sustainability policy** of Guala Closures Group is based on the following.

Principles

- > Sustainable growth: actively contribute to achieving sustainable business growth, reducing the impacts generated on the various actors involved along the entire "value chain": Employees, Suppliers, Customers and local communities, ensuring legal compliance and satisfaction of the parties concerned.
- Culture of sustainability: spreading the culture of sustainability, making the people of Guala Closures aware, and raise awareness on external Stakeholders, on the importance of adopting responsible behavior in the management of relevant environmental, social and governance issues.
- > Stakeholder Engagement: launch mechanisms for dialogue and discussion with stakeholders in order to identify projects and activities on sustainability aspects (ESG) and create shared value.
- > Communication and transparency: reporting on one's performance on environmental, social and governance issues, using internationally recognized methods and tools, ensuring the truthfulness and objectivity of the data disclosed.

Commitments

- Respect for ethical and social aspects:
 - commitment to carry out corporate activities in compliance with the highest ethical and social standards, not tolerating acts of corruption and operating in compliance with applicable laws and regulations; in this perspective, Guala Closures Group disseminates its "Code of Ethics and Conduct" and the "Anti-corruption and whistleblowing policy" to Stakeholders. Furthermore, support to the community through financial support and active participation in charitable, research and voluntary initiatives.
- Recognition of the value of our workers:
 - enhancement of human capital, ensuring a safe and inclusive work environment and commitment to the development of skills and competences, ensuring that the recruitment, training and professional growth of resources are based on fairness and merit, combating any form of discrimination. Guala Closures Group is committed to ensuring compliance with the various applicable collective labor agreements and compliance with the laws on occupational safety and health in the various work environments.
- Respect for the environment:
- integration of environmental aspects within company processes, in order to correctly manage the use of resources, promoting the reduction of direct and indirect environmental impacts, favoring sustainable procurement and consumption policies of raw materials and natural resources; moreover, favoring the purchase of energy from renewable sources. Guala Closures Group is committed to implementing concrete actions aimed at reducing energy consumption and natural resources, emissions and waste generated.
- > Commitment on sustainable water management:
 - the use of water resources within the production processes of Guala Closures Group is limited and, consequently, the impact on water resources is minimal. However, Guala Closures Group recognizes that access to water is a universal human right and that water is a non-limitless natural resource and is committed to efficient management of water

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resources, aiming at a progressive reduction of withdrawals and implementing water recycling projects, particularly in plants located in water-scarce regions.

- Commitment on climate change:
 - implementation of the commitments that were ratified in the 2015 Paris Agreement on climate change. To meet this target, Guala Closures undertakes to reduce its GHG emissions, to use natural resources and energy with a lower environmental impact, to reduce waste, to implement reforestation projects and/or to purchase carbon credits; in addition, it implements training programs that educate employees on their role in saving energy and reducing greenhouse gas emissions, also through "good manufacturing practices (GMP)".
- > Commitment on sustainable procurement:
 - recognition that sustainable procurement ensures the presence of the fundamental principles of sustainability throughout the life cycle of the products and services provided. Guala Closures Group undertakes to transmit its "Code of Ethics and Conduct" and "Policies" to its critical suppliers, identified through a risk assessment, requesting their implementation and compliance; moreover, it undertakes to evaluate them also for the environmental, ethical and social aspects, using, from time to time, the most appropriate tools.
- Value creation:

commitment to innovation and maximization of process efficiencies, both in the context of production activities and in the provision of services. Guala Closures Group pursues the technological and digital transition, considering it a necessary tool for innovation and the evolution of processes towards the creation of value; moreover, collaboration for the research of new technologies and for innovation is a necessary tool for the achievement of sustainability strategies and objectives. In addition, Guala Closures Group undertakes to use eco-compatible design guidelines for products with the aim of facilitating their recycling at the end of their life and increasing the use of raw materials with low environmental impact.

Objectives

With reference to the 17 sustainable development goals, "SDGs", on which the UN Agenda 2030 is based, Guala Closures Group has issued its own "Sustainable Development Program 2022 ÷ 2030" with related objectives and KPIs, periodically reported through the application of international standards.

Below are ESG's public objectives.

> Environmental objectives: reduction of GHG emissions (Scope I, II, III), issued and approved with respect to the

requirements established by the Science Based Targets initiative (SBTi); moreover, reduction of water consumption, reduction of waste production, ISO 50001:2018

certification.

> Social objectives: focus on health and safety in the plants, ISO 45001:2018 certification, strengthening of the

culture of safety and specific objectives on the "Diversity & Inclusion" program.

Governance objectives: dissemination and implementation of the Code of Ethics and Conduct and policies, both

internally and in the Supply Chain.

Furthermore, Guala Closures Group undertakes to assign and monitor, through appropriate KPIs, further internal objectives, for example: improvement of production efficiencies, waste reduction, development of sustainable products; these objectives also contribute to improving the performance expected from the 2022 ÷ 2030 sustainable development programme.

In addition to the responsibilities already indicated above, the responsibility for managing the sustainability program, as well as the achievement of the related objectives, is in any case the responsibility of the entire corporate structure which must collaborate, according to its powers and responsibilities, to satisfy the principles expressed 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 Country Manager, B.U. General Manager and each Plant Manager shall understand, communicate and apply them to its organisation, together with the preparation, implementation and verification of adequate measurable objectives, as required by the Group's sustainability program.

Franco Bove (Chief Operating Officer)

June

Gabriele Del Torchio (Chairman and Chief Executive Officer)

Sustainability policy - Page 2 of 2