

LAND ACQUISITION AND BIODIVERSITY POLICY

(for start-up of new production sites)

Guala Closures 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 both any potential complicity in human rights violations and any potential negative impact on local biodiversity (where relevant), related to our operations or supply chain.

The land acquisition for public purpose is inevitable in a growing economy; nevertheless, Guala Closures will never acquire land in forced manner.

Our principles related to land acquisition and/or creation of new manufacturing sites are:

- We are opposed to the use of any form of forced land acquisition as land shall be acquired through free negotiation and after clear payment of adequate compensation at market value.
- We believe that local communities need to have benefit by the industrial areas, so that we encourage local recruitment of local personnel to work in our manufacturing sites.
- We are committed to respecting and protecting the rights and the culture of local communities and those affected by our operations.
- We are committed to providing a safe and suitable working environment, free of discrimination.
- We are committed to minimizing our environmental impacts.

Our principles related to biodiversity are:

- We are committed to safeguarding the flora and fauna of ecologically significant areas that could be present where we establish new production sites.
- We are committed to preventing, where possible, or minimising and mitigating biodiversity risks throughout our businesses.

Future actions

In order to prevent indiscriminate acquisition, for future start of new sites, it is our intention to:

- Ensure the acquisition of land and/or building of industrial infrastructures through free negotiation and with clear payment of adequate compensation at market value.
- Verify with local Authorities the absence of special varieties of vegetal plants and/or animals living on the land concerned where we are going to establish our business.

This policy will be reviewed periodically and updated if a change in legislation impacts our Company 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 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 plants. Each Corporate Director and each B.U. General Manager shall understand, communicate and apply them to its organisation.

Mauro Caneschi

(Chief Executive Officer)

