



Speak Up Policy

Scope

The Frigoglass Speak up Policy is designed to support its employees, full time or part-time, contractors, providers, clients and other audience members, which consider that they have discovered violations of the company procedures or corruption actions or other irregularities. All disclosures are being treated as highly confidential and sensitive. The Speak up policy is here to help you raise your concerns at an early stage and in the right way. The procedure described below is additional to the complaint procedure described in the Company's Code of Business Conduct

Our Assurances to You:

If you raise a genuine concern under this policy, you will not be at risk of losing your job or suffering any form of victimisation or retribution from the company as a result. We take claims of retaliation seriously and all relevant allegations will be investigated. Provided you are acting in good faith, it does not matter if you are mistaken. This assurance does not however extend to those who are found to have raised a matter knowingly falsely or maliciously. All information relating to an investigation shall be kept confidential and only be provided to those persons within Frigoglass who have an absolute need to know such information.

Concerns to be raised:

- Conduct which is an offence or a breach of law.
- Health and safety risks, including risks to the public as well as to other employees.
- Bribes or kickbacks.
- Information Security Breach. e. g Missing laptop with confidential information
- Questionable accounting. e.g. Violation of IFRS standards
- Possible fraud and corruption.
- Other unethical conduct. e.g. Harassment or discrimination
- Damage to the environment.

False Allegations:

Those who make knowingly false allegations or act maliciously may be subject to disciplinary actions.

Reporting procedure:

All relevant concerns raised are routed to the company's Head of Internal Audit and the Head of Controls Compliance & Ethics who notify the Corporate Compliance Committee* on all significant issues.

Upon receipt of the allegation the Head of Internal Audit along with the Head of Controls Compliance & Ethics will decide whether a further investigation is required in cooperation with the respective functional executive director. If eventually an investigation is decided then the Corporate Compliance Committee will be notified and a mandate will be issued to local management regarding the details of the investigation.

Immediately upon closure of the investigation a final report will be forwarded to the Corporate Compliance Committee for further actions.

The Audit Committee will be informed on the outcome of the case.

All concerns which are raised eponymously will be treated confidentially and answered within a reasonable timeframe.

Anonymous concerns will be investigated based on the seriousness of the issue raised and the likelihood of confirming the allegation from attributable sources.

Finally everyone involved in the procedure above must keep all information confidential. Failure of doing so may prejudice the course of an investigation.

Responsibility

All those persons referred to within the scope of this policy are required to be familiar with the terms of this policy.

Individual managers are responsible for ensuring that this policy is communicated and applied within their own area.

Any queries on the application or, interpretation of this policy must be discussed with the Head of Internal Audit prior to any action being taken.

Communication channels

Allegations might be reported using the following methods:

Via Telephone: +30210 6165855 (International charges applied)

Via E-mail: compliance@frigoglass.com. Available around the clock every day of the year

The language of communication is English.

These channels for reporting irregularities are not in conflict with international legislation concerning the processing of personal data.

The Speak up Policy allows you to report irregularities through the Online Speak up Reporting Form. (Attached form)

Please describe the incident as detailed as possible so we can start the investigation. Through this portal we want to reduce the consequences of professional and legal standards violations and potential risks.

Please do not use these channels for complaints about products or services of the Company.

***Corporate Compliance Committee Members**

Group HR Committee Chairman

Group Chief Financial Officer

Group HR Director

REMEMBER

Integrity and Social Responsibility are the foundation for everything we do.

It means that we stick to our Business Principles and that we insist on our Core Values.

Speak up Form

Frigoglass will treat all disclosures in a confidential and sensitive manner. The process has been designed so as to protect your identity when communicating your concern. This Speak up form gives you the opportunity to provide your name and contact information as this information may assist us in investigating your concern. Should you not wish to provide your name, reported incidents will still be accepted and investigated, as appropriate, but if additional information is required we may not be able to fulfil our investigation.

Instructions

Please provide as much detail as possible. If you wish to remain anonymous, do not include your relationship to persons identified in your report or your location relative to persons or incidents in your report.

Speak up Form

FRAUD GOVERNANCE HARASSMENT
CORRUPTION CONFLICT OF INTEREST OTHER

Please describe the incident as detailed as possible.

Please complete all sections below:

For name: _____

Surname: _____

Organization: _____

Title: _____

Telephone Number: _____

E-mail Address: _____

Submit your speak up form via e-mail to compliance@frigoglass.com