

## 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 who notifies the Corporate Compliance Committee\* on all significant issues.

Upon receipt of the allegation, the Head of Internal Audit decides 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.

### \*Corporate Compliance Committee Members

Group HR Committee Chairman, Group Chief Financial Officer, Group HR Director

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 interpretation of this policy must be discussed with the Head of Internal Audit.

## Communication channels

Allegations can be confidentially reported either online or by phone, using our Speak Up Service [frigoglass.ethicspoint.com](http://frigoglass.ethicspoint.com). The Speak Up Service is run by an independent third party and is available 24/7, 365 days a year. English is the preferred language.

<b>Online</b>	To file a concern online, visit the Speak Up Service's website at <a href="http://frigoglass.ethicspoint.com">frigoglass.ethicspoint.com</a> where you can fill in a form to submit your concern.
<b>By Phone</b>	To raise your concern by phone, call the Speak Up Service's line in your country. Check <a href="http://frigoglass.ethicspoint.com">frigoglass.ethicspoint.com</a> for the phone numbers and further instructions.

These channels are in alignment with international legislation concerning the processing of personal data.

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

## 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.

