

Purpose

Our Company is committed to conducting business with integrity and fairness, with respect for the law and our values. In spite of this commitment, instances of violation of regulations, our Code of Business Conduct and/or its policies may be observed. In such cases, you are encouraged to speak up. By doing so, you give our Company the opportunity to deal with the issue. Remaining silent can only expose us further to professional and legal standards violations and potential risks.

The purpose of this policy is to explain how you can raise concerns at an early stage and in the right way, about suspected misconduct in confidence and without fear of retaliation.

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.

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

This Speak Up policy can be used to raise concerns about suspected misconduct within our Company, that is any violation of our Code of Business Conduct and/or its policies under which Frigoglass operates.

Examples of concerns that can be raised using this Speak Up policy are:

- Fraud and corruption
- Human rights violations
- Discrimination or harassment
- Violations of competition laws and rules
- Money laundering or violations of sanction laws
- Inadequate financial or non-financial recordkeeping and questionable accounting
- Bribery
- Conflicts of Interest
- Environmental, health and safety issues/risks
- Improper use of company resources
- Disclosure of confidential information
- Information Security breaches

Do not use this policy:

- To report events presenting an immediate threat to life or property. If you need emergency assistance, please contact your country's emergency phone number.
- To settle personal disputes.
- For complaints related to products or services of the Company
- To make accusations which you know are false. Doing so may lead to disciplinary measures.



Overseeing our Speak Up process

All concerns reported through our dedicated site (frigoglass.ethicspoint.com) are routed to the company's Head of Internal Audit.

Upon receipt of the allegation, the Head of Internal Audit along with the HR Director and the Chief Financial Officer decide whether a further investigation is required. The respective functional executive director is engaged if necessary. Furthermore, where allegations related to EXCOM or Senior management¹ members arise, the Chairman of the HR, Remuneration and Nomination Committee and the CEO are informed. The Audit Committee is informed on all significant issues. In addition, if a further investigation is needed a mandate is issued to the functional/local management. Soon after the investigation is closed a final report is prepared from the investigation team and reviewed with the HR Director and the Chief Financial Officer. The Audit Committee is informed on the outcome of the case, who informs the Board of Directors depending on the severity of the substantiated 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.

Communication channels

Allegations can be confidentially reported either online or by phone, using our Speak Up Service 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.

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

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

Responsibility

All parties 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.

Further Assistance

If you have questions relating to this Speak Up Policy or if you need assistance, please contact:

- Your manager
- Your Human Resources representative
- Your Internal Auditor

¹Senior Management: Plant Managers and personnel reporting directly to EXCOM members

