

## MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT POLICY

### Introduction

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At **Stelium Technology Italy S.p.A.** we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operations and supply chain. We have taken concrete steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business and to implement steps to prevent slavery and human trafficking during the financial year 2024.

### Our business and supply chains

We distribute electronic and electromechanical components, professional electronic systems, special products and materials for the manufacturing industries that set up electronic equipment and systems in the public and private industrial sectors, in the aerospace and defence sector both on a national and international area.

We haven't been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.

### Policies

**Stelium Technology Italy S.p.A.** operates the following policies for identifying and preventing slavery and human trafficking in its operations:

- Whistleblowing Policy - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistle-blowers;
- we encourage employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain;
- Ethixbase360T-Tcertification underscores Stelium's commitment to transparency in international commercial transactions.

### Supplier due diligence

**Steliau Technology Italy S.p.A.** conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:

- assessing risks in the provision of particular services;
- auditing the suppliers, and their health and safety standards, labour relations and employee contracts;
- requiring improvements to substandard employment practices;
- sanctioning suppliers that fail to improve their performance in line with our requirements.

We require all suppliers to attest that:

- they don't use any form of forced, compulsory or slave labour;
- their employees work voluntarily and are entitled to leave work;
- they provide each employee with an employment contract that contains a reasonable notice period for terminating their employment ;
- they don't require employees to post a deposit/bond and don't withhold their salaries for any reasons;
- they don't require employees to surrender their passports or work permits as a condition of employment.

This statement has been approved by the board of **Steliau Technology Italy S.p.A.**

Milan, 01.01.2024