Modern Slavery Statement

Pursuant to the Modern Slavery Act 2015 – Section 54 (UK)

- Tax Year 2026 -

Approved by Elesa S.p.A. Board of Directors on: 17/04/2026

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1. COMPANY PROFILE

Founded in 1941, Elesa S.p.A. (hereinafter also referred to as "Elesa" or the "Company") is a world leader in the design, production, and distribution of standard plastic and metal components for the mechanical, machinery, automation, and industrial equipment industries. Thanks to a balance of technological innovation, manufacturing expertise, and attention to design, the Company has developed a complete and diversified range of solutions, designed to ensure high performance, reliability, and added value for its customers.

The company's products are distributed in over 60 countries through a global network of numerous subsidiaries worldwide, ensuring proximity to customers and a high level of international service.

The Company holds the following certifications:

- ISO 9001:2015 – Quality and management system certification;
- ISO 45001:2018 – Occupational health and safety management system certification;
- ISO 14001:2015 – Environmental management system certification;
- ISO 27001:2022 – Certification of information security management systems.

1.1. UK-based operations

Elesa S.p.A. entered the UK market in the late 1950s through a local distributor. In 1991, with the acquisition of the same distributor, specializing in the production of position indicators, the Elesa "Group" strengthened its presence by establishing its second foreign subsidiary, Elesa (UK) Ltd. The subsidiary employs a highly qualified team with experience in the sector and operates a large warehouse of standard components. Furthermore, it offers customers comprehensive support and a high level of professionalism, both for the application of standard components and for the development of customized technical solutions, in close collaboration with the R&D engineers of the Elesa "Group"'s parent company in Italy.

2. 2026 DECLARATION ON MODERN SLAVERY

Elesa bases its operations on solid ethical principles, aiming for sustainable business development and acting transparently, demonstrating its reliability to its stakeholders.

The Company recognizes the fundamental importance of operating ethically and responsibly and is committed to ensuring that no form of modern slavery, forced labor, or human trafficking occurs within its operations and throughout its supply chain, in accordance with the Modern Slavery Act 2015. To this end, the company adopts and aims to consistently implement measures and procedures aimed at preventing,

identifying, and combating any potential human rights violations, promoting dignified, transparent, and respectful working conditions for all those with whom it collaborates in any capacity.

This document has been approved by the Board of Directors of Elesa S.p.A. and describes the measures adopted to ensure the absence of any form of modern slavery, forced labour and human trafficking within the company and along its supply chain, as required by the UK's "Modern Slavery Act 2015 – Section 54".

The statement above represents and establishes fundamental and binding values for Elesa.

3. DEFINITIONS

Below are some relevant definitions, as set out in Section 54 of the Modern Slavery Act 2015, for the purposes of this statement.

- *"commercial organisation" means:*
  - a) a body corporate (wherever incorporated) which carries on a business, or part of a business, in any part of the United Kingdom, or
  - b) a partnership (wherever formed) which carries on a business, or part of a business, in any part of the United Kingdom,
- *and for this purpose "business" includes a trade or profession;*
- *"partnership" means:*
  - a) a partnership within the Partnership Act 1890,
  - b) a limited partnership registered under the Limited Partnerships Act 1907, or
  - c) a firm, or an entity of a similar character, formed under the law of a country outside the United Kingdom;
- "slavery and human *trafficking*" means:
  - a) conduct which constitutes an offence under any of the following:
    - (i) section 1, 2 or 4 of this Act,
    - (ii) section 1, 2 or 4 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015,
    - (iii) section 1 or 4 of the Human Trafficking and Exploitation (Scotland) Act 2015, or

b) conduct which would constitute an offence in a part of the United Kingdom under any of those provisions if the conduct took place in that part of the United Kingdom.

4. PROCUREMENT OF GOODS AND SERVICES

Elesa recognizes the importance of acting transparently and ethically in its business operations. These values are also considered fundamental when selecting its suppliers. This activity is conducted according to consolidated procedures and in compliance with established practices.

Specifically, the procurement process includes a preliminary selection and verification phase, for both new and existing suppliers (through periodic reviews), and is structured differently depending on whether the purchase is a direct good, an indirect good, or a service.

The guidelines for selecting (and/or reviewing) suppliers are as follows: once the need to identify a new supplier has arisen, we proceed with (i) an initial phase of gathering general information about the supplier, followed by (ii) a second phase aimed at verifying the presence of certifications guaranteeing high standards and, in their absence, assessing whether the systems adopted by the supplier meet Elesa's requirements. Depending on the type of supplier, different levels of control may be identified. In any case, all checks are conducted using specific checklists, periodically updated and integrated into the Management System, differentiated according to the product category requested.

The procurement processes for goods and services are aimed at corporate competitiveness, while ensuring equal opportunities for all suppliers. These processes are based on pre-contractual and contractual behaviours characterized by loyalty, transparency, and mutual collaboration. Should a supplier fail to comply with the principles set forth in Elesa's Code of Ethics, the Supplier Code of Conduct, and the Sustainable Procurement Policy, the company reserves the right to take appropriate measures, including suspending or terminating future collaborations.

The procedures implemented ensure that the qualification process for its supply chain is transparent, fair, and respectful of Elesa's ethical values. The Company expects its suppliers to also apply these principles.

5. ELESA VALUES

Elesa's philosophy is geared toward sustainable business development in economic, social, and environmental terms. This means being competitive and innovative, generating value not only by focusing on production efficiency but also by consistently meeting customer needs, taking a responsible role towards society, maintaining ethical behaviour with all internal and external stakeholders, protecting the environment, and

enhancing the local area in which we operate.

5.1. Ethical principles

The activities carried out by Elesa and its subsidiaries are based on the following ethical principles: legality, freedom of association and respect for trade union rights, fairness, honesty, and loyalty, transparency, efficiency and professional commitment, confidentiality, anti-corruption, competition, occupational health and safety, environmental protection, respect for people, inclusiveness and non-discrimination, prohibition of child or forced labour, and respect for the community and local communities.

Respect for human rights is fundamental, and the Company considers the fight against all forms of modern slavery, forced labour, and human trafficking to be a fundamental value for its organization. It firmly rejects any practice that limits the freedom, dignity, and fundamental rights of individuals, and is always committed to acting in accordance with the highest ethical and moral standards in all its operations, both nationally and internationally.

The values described are expressed in Elesa's Code of Ethics, which can be consulted at the following link: Code of Ethics.

5.2. Whistleblowing

Elesa guarantees a work environment where any unlawful conduct within the Company can be freely reported. To this end, in compliance with Legislative Decree 24/2023, the Company has implemented a Whistleblowing System.

Reports can be made through the dedicated section of the company website, shown below: Whistleblowing.

6. RISK ASSESSMENT

Elesa places particular emphasis on identifying and assessing corporate risks, as well as improving a set of procedures aimed at mitigating and managing risks in line with corporate objectives.

In this context, the Company – by appointing a specialized firm – has identified the main risks associated with its supply chain.

To monitor and manage these risks, Elesa will conduct an annual updated risk assessment to address the relevant risk areas.

Furthermore, Elesa has adopted its own Organization, Management, and Control Model

pursuant to Italian Legislative Decree No. 231/2001 and, consequently, appointed a Supervisory Body (SB), which periodically reviews company management processes, including those related to supplier evaluation, purchasing, and human resources. The Supervisory Body jointly ensures proper compliance with the values established in its Code of Ethics, the rules defined within the Organization, Management, and Control Model, and whistleblowing regulations.

7. INFORMATION

Elesa recognizes the importance of awareness and information as fundamental tools for preventing and combating modern slavery. For this reason, the organization is committed to raising awareness, informing, and maintaining clear communication and training programs within its organization regarding ethical principles and policies for respecting human rights, labour standards, and the prevention of modern slavery.

Therefore, the company aims to develop a corporate culture that is aware, attentive, and capable of promptly identifying potential risk situations. Elesa is committed to disseminating up-to-date knowledge and promoting responsible behaviour, which is essential to ensuring full respect for human rights.

8. COMMITMENT TO THE FUTURE

For Elesa, ethics is not only the benchmark for defining corporate objectives, but also a key driver for planning future activities, with a commitment to pursuing value creation for the years to come and for future generations. Elesa believes it is essential that business integrity and respect for human rights are priorities in defining objectives throughout the supply chain; the Company is committed to proactively working to encourage the fight against modern slavery by adapting its activities, operations, and procurement procedures.