

This statement on modern slavery outlines Eural Gnutti S.p.A's standards to ensure that all employees are treated with respect and dignity, that they work of their own free will and that they are fairly compensated for their efforts. Eural Gnutti S.p.A is committed to social and environmental responsibility and has zero tolerance for slavery and human trafficking. We are committed on improving our practices to combat slavery and human trafficking and to ensure that we are not complicit in any human rights violation. Eural Gnutti S.p.A supports and respects the principles proclaimed in the Universal Declaration of Human Rights and believes that companies must ensure that they are not party in human rights abuses.

This statement has been prepared according to the Transparency in Supply Chains Act of California, the Modern Slavery Act of the United Kingdom, the Commonwealth Modern Slavery Act of Australia and the Fighting Against Forced Labour and Child Labour in Supply Chains Act of Canada.

Eural Gnutti S.p.A , a world leader in the production of semi-finished aluminium products, mainly carries out its activities in its production sites in Rovato and Pontevico.

Our supply chain

Our company operates a foundry plant using primary metal material, secondary material and pre- and post-consumer scrap. The billets produced by the foundry are then processed in our extrusion and cold drawing plant. Our supply chain includes raw material suppliers, scrap metal suppliers and logistics partners, operating nationally and internationally.

We review internally our supply chain to assess risks and review aspects of the supply chain including, but not limited to, security, human trafficking, child labour and other legal requirements to ensure compliance with our supply chain policy.

Our policies on slavery and human trafficking

We are committed to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our policies reflect our commitment to act ethically and with integrity in all our business dealings and to implement and enforce effective systems and controls to ensure that slavery and human trafficking do not take place in any part of our supply chains.

There must be no harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, slavery, mental or physical coercion or verbal abuse of workers, and there must be no threat of such treatment, as outlined in our employment policies and Code of Ethics.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk, we adhere to our due diligence processes as outlined in the company's Social Governance Policy, Code of Business Conduct and Eural Gnutti S.p.A.'s human resources management documentation.

We have implemented systems to:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains by conducting background checks through due diligence mechanisms;
- Monitor potential risk areas in our supply chains;
- Protect whistleblowers and report unethical conduct; and
- Where possible, we build long-term relationships with our supply chains nationally and internationally and expect these entities to have adequate policies and processes against slavery and human trafficking.

Supplier adherence to our values and ethics

We have zero tolerance for slavery and human trafficking and we make sure that everyone in our supply chain and contractors respect our ethics.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and operations, we provide training to all our staff.

This statement is made pursuant to the Modern Slavery Act 2015 and constitutes Eural Gnutti S.p.A Limited's statement on slavery and human trafficking for the financial year ending 2025.

Rovato, 15/01/2025

*The General Management
(Paola Gnutti)*


