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MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FINANCIAL YEAR 2025/2026

(Prepared pursuant to Section 54 of the *Modern Slavery Act 2015)*

INTRODUCTION

The United Kingdom's Modern Slavery Act 2015 was introduced to prevent and combat various forms of modern slavery and human trafficking.

This statement is prepared pursuant to Section 54 of the Modern Slavery Act 2015 and is made on behalf of Stamperia Carcano Giuseppe S.p.A. and its subsidiary Strops Srl (collectively referred to as *Carcano*) and sets out the steps Carcano has taken during the financial year 2025/2026 to prevent slavery and human trafficking from taking place in any of its supply chain or any part of its own business. Carcano's definition of slavery and human trafficking is aligned to Section 54 (12) of the Modern Slavery Act 2015.

Carcano has been operating in the metalworking sector for over 70 years, guided by strong ethical values, social responsibility and a commitment to protecting people. Although supported by an established governance framework, Carcano continues to strengthen its approach to the continuous improvement of safeguards related to supply chain oversight and risk mitigation.

CARCANO'S COMMITMENT

Modern slavery constitutes a serious violation of human rights and can take the form of human trafficking, forced labour, coercion, or exploitation.
Carcano is committed to:

- ✓ promoting a respectful, safe, and inclusive working environment;
- ✓ preventing any form of exploitation within its operations and supply chain;
- ✓ working with business partners who share aligned values and ethical standards.

This commitment is supported by structured corporate policies, a governance model built on integrity, and a control framework designed to prevent and mitigate risks.

ORGANISATIONAL STRUCTURE AND BUSINESS ACTIVITIES

Carcano is an Italian company with its production facility located in Italy and employs approximately 150 people. In addition to its own manufacturing of lifting accessories and components for electrical and railway networks, Carcano also distributes products sourced from external suppliers, including some located outside the European Union.

Carcano exports to countries including the United Kingdom.

SUPPLY CHAIN

Carcano's supply chain is primarily based on Italian and European suppliers, with a limited number of non-EU partners for specific product categories. The predominantly local nature of procurement significantly reduces the risk of modern slavery, but this risk cannot be fully eliminated.

Carcano adopts a proportionate risk-based approach to assessing and managing suppliers, with specific attention given to higher-risk geographical areas.

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VALUES, POLICIES AND PROCEDURES

Carcano's governance framework incorporates policies and principles designed to support the prevention of modern slavery, including:

- ✓ Code of Ethics, promoting integrity, transparency, and respect for human rights, and requiring the reporting of any suspicious behaviour.
- ✓ Human Rights Policies, aligned with international standards and European principles on the protection of individuals.
- ✓ Responsible Procurement Guidelines, establishing compliance and responsibility criteria that suppliers are expected to meet.
- ✓ Whistleblowing System, enabling confidential and secure reporting while ensuring protection from retaliation (https://carcano.whistlelink.com).
- ✓ Governance and Internal Control Model, designed to prevent unlawful conduct and behaviours inconsistent with ethical principles.

DUE DILIGENCE AND SUPPLY CHAIN MONITORING

Carcano implements supplier assessment and monitoring processes proportionate to the level of risk and the type of procurement involved.
In general, this includes:

- ✓ preliminary checks on suppliers;
- ✓ requiring adherence to Carcano's ethical principles;
- ✓ proportionate controls on operating practices and geographical origin;
- ✓ the possibility of adopting corrective actions or terminating the business relationship in the event of serious non-compliance.

TRAINING AND AWARENESS

Carcano fosters internal awareness on modern slavery and human rights matters through:

- ✓ training initiatives for teams that are closely involved in supply chain interactions;
- ✓ internal communication regarding key corporate policies;
- ✓ dissemination of information on the proper use of the whisteblowing reporting channel.

Approval

This statement has been approved by the Board of Directors of Stamperia Carcano S.p.A. and is signed by the Legal Representative.

Date: 25/02/2026

Name and Title: *Luca Carcano – Legal Representative*