

Modern Slavery and Human Trafficking Policy Statement

This statement is published by Covatek & C. SpA (hereinafter also “Covatek” or “Group”) in accordance with the Modern Slavery Act 2015. It is the Group’s first Modern Slavery Statement and it is intended to communicate the steps Covatek has taken and is committed to take in the medium term to ensure the prevention of modern slavery and human trafficking within its business and supply chains.

Covatek’s business and supply chains

Covatek, operates in Russia, in Arabia, Korea, in South America, and is also present in various other countries around the world with partners and subsidiaries.

Policies

The Group supports and is committed to upholding the UN Guiding Principles on Business and Human Rights and the core labour standards set out by the International Labour Organisation. The Group recognises that it has a responsibility to take a robust approach to human rights (and modern slavery and human trafficking issues) and intends to continuously integrate and ameliorate the policies and controls it has in place to safeguard

against any form of **slavery, servitude, human trafficking** and forced labour taking place within the business or the supply chain.

Covatek companies must comply with local legislation and regulations, and must conduct their activities in line with the **Code of Ethics** and its core values of honesty, integrity and respect for people. The Code of Ethics provides support to Covatek's commitments to being responsible and respectful, and it helps staff and contractors to make informed, ethical and legal decisions. Suppliers worldwide that wish to do business with Covatek have to sign the general conditions of supply that include the Code of Ethics.

The Group intends to integrate the current Code of Ethics with punctual, direct and unequivocal references to the issue of human rights (including modern slavery and human trafficking issues) and is committed to ensuring that its employees and contractors act ethically and with integrity and transparency in its business dealings. The updated Code of Ethics will stipulate that Covatek respects fundamental human rights in its activities and supply chain.

To maintain the highest standards of ethical, moral and legal conduct, the Company encourages its employees who have concerns about suspected misconduct to come forward and express these concerns without fear of punishment or unfair treatment. The Whistleblowing Policy, aims to provide a safe channel for employees and other stakeholders to raise concerns on violations of legal or regulatory requirements. It will be among the Covatek's priorities, scope of the Whistleblowing Policy to human rights (including modern slavery and human trafficking issues)

Risk assessment

Covatek considers that the greatest risk to the safeguarding of human rights (including modern slavery and human trafficking issues) could be found in its supply chain, as this is the area where operations and managerial oversight are out of the Group's direct control. Also within the supply chain, certain areas and suppliers may result having a higher risk than others.