

MODERN SLAVERY POLICY STATEMENT

IO K05.01 Rev. 0

This statement reflects our zero-tolerance approach to slavery and human trafficking and sets out the systems and controls that we have in place to ensure that slavery is not taking place within our business or in our supply chain. This statement is made on behalf Cavi F.E.R.M.I., pursuant to section 54(1) of the UK's Modern Slavery Act 2015, and constitutes our Company's slavery and human trafficking statement.

Cavi F.E.R.M.I. and its employees are committed to acting ethically and with integrity in all business relationships. This includes implementing and enforcing effective systems and controls to prevent slavery and human trafficking from being present anywhere in our supply chain. Staff are expected and encouraged to report any concerns to management, and these concerns will be acted upon.

This Modern Slavery Policy Statement outlines the formal procedures as to how this issue will be monitored, mitigated and managed, including disciplinary procedures where they are breached, taking into account and supported by the policies, procedures and requirements documented in our Management Systems. This is compliant with the requirements of ISO 9001:2015; additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance.

Supply chain

Cavi F.E.R.M.I. have good visibility and a close relationship with our global supply chain, which comprises organisation who supply goods and services to our company.

All suppliers are expected to meet our high professional standards and ensure compliance with all applicable legislation, including the Modern Slavery Act 2015.

Cavi F.E.R.M.I. will ensure the prevention of slavery and human trafficking through the identification and mitigation of risks, not limited to the following ways:

- ∞ Continued examining and investigation of our supply chain, including contractors, sub-contractors, policies, and contracts.
- ∞ A preferred supplier list is in operation, where due diligence is conducted on all suppliers prior to confirming them on this list. This includes an online search to ensure there are no convictions for offences relating to modern slavery and, where applicable, undertaking onsite audits of working conditions.
- ∞ Our Modern Slavery Policy Statement forms part of our contracts with suppliers.

The company has a zero-tolerance policy towards slavery and human trafficking, and will not knowingly support or deal with any business involved in such practices. We expect all those in our supply chain and contractors to share and comply with our values.

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Our Policies

Internally, we engage with our employees on a professional and respectful basis and have established contractual employment practices clearly outlining their rights under Italy legislation.

Cavi F.E.R.M.I. will ensure the prevention of slavery and human trafficking through the identification and mitigation of risks, not limited to the following ways:

- ∞ All employees are paid above national minimum wage and have the right to work;
- ∞ Encouraging any concerns to be reported and offering protection to whistleblowers.
- ∞ Training is provided to all relevant members of staff, and all Managers have been briefed, to ensure a high level of understanding of the risks of modern slavery and human trafficking whether in our supply chain or our business.
- ∞ Regular re-evaluation of the risk of non-compliance as part of our cyclical Compliance Risk Register assessment. In the event that an issue or a compliance breach is identified, we are committed to acting promptly and to the fullest extent of our powers to remedy the incident. This includes but is not limited to legal recourse and the notification of applicable legal or governmental bodies.

Our employees are expected to raise any concerns about any issue or suspicion of slavery in our business or supply chain at the earliest possible stage. They should do so by contacting our divisional CEO who will then investigate and take any necessary action. Any reported breach of this statement by our employees will be investigated and may lead to disciplinary action.

Risks

We aim at identifying risks to workers in our supply chain by regularly keeping in touch to promptly manage and resolve possible issues.

Quality products and services from ethical suppliers are part, as well as price, in our evaluation of a potential new supplier, we would therefore assess the approach said supplier takes to its people and the workers in its own supply chain before establishing a contractual relationship.

Cavi F.E.R.M.I. srl
Maurizio Pizzola
Date: 09/01/2024