



DECLARATION ON MODERN SLAVERY

F.LLI GIACOMELLO Srl

Adopted on 15th September 2025
Updated on 16th January 2026

STATEMENT ON MODERN SLAVERY

F.LLI GIACOMELLO SRL

The Modern Slavery Statement outlines the specific actions that F.lli Giacomello Srl has undertaken during the previous fiscal year, FY 2025, to counteract forced labor, human trafficking, slavery and servitude, debt bondage, child labor, deceptive recruitment of labor or services, and other similar conduct (collectively, "modern slavery") in its operations and supply chains.

I. COMMERCIAL ACTIVITIES AND SUPPLY CHAINS

F.lli Giacomello Srl was founded in 1985. Over the years it has become a **leading company in the level indicator market** and has maintained **the unique relationship with the customer as its focus**.

F.lli Giacomello Srl handles the **design , production , testing , and shipping** of its products. It also pays close attention to sourcing **certified raw materials and components**, directly controlling the entire production chain and selecting the best companies, preferably Italian.

Its **flexibility** allows it to **customize products** to meet the needs of its customers, enabling it to meet a wide range of requests.

The products cover a wide variety of sectors: **hydraulics, water treatment, chemicals, oil and gas, marine, earthmoving machinery, food, and certified areas**.

The management of F.lli Giacomello Srl is focused on monitoring and improving **marketing, communications, new technologies , and the exploration of new markets** .

F.lli Giacomello Srl is focused on **research, innovation, and quality** , with the goal of creating **new products** that can **expand the offering** for Italian and international customers, through an increasingly complete and competitive package of **level sensors**.

II. GUIDING PRINCIPLES AND COMMITMENTS OF F.LLI GIACOMELLO SRL

In F.lli Giacomello Srl, we are collectively committed to fostering a safe and healthy work environment, promoting innovation and high performance, and responsibly directing our operations to achieve exceptional business results. This commitment underpins our efforts to combat modern slavery at all stages of product production and throughout the company's supply chains. F.lli Giacomello Srl expects its suppliers and business partners to maintain the same level of respect for human rights.

F.lli Giacomello Srl is committed to impartiality towards all those with whom it does business, is committed to upholding all human rights, including the right to be free from modern slavery, and has adopted policies consistent with the United Nations ("UN") Universal Declaration of Human Rights, the United Nations Convention on the Rights of the Child, the United Nations Convention on the Elimination of All Forms of Discrimination against Women, the United Nations Global Compact, and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, as well as the standards of the International Labour Organization (ILO).

POLICIES

F.lli Giacomello Srl adopts various policies to support its guiding principles and social responsibility commitments.

Code of Ethics : This applies to the entire company and expresses the company's position on human rights, defining the expectation that all people be treated with dignity and respect. It covers fundamental rights, such as the prohibition of child labor and forced labor, non-harassment, reasonable working hours, fair wages, and equal opportunities.

Supplier Code of Conduct : The Supplier Code of Conduct ("SCC") defines expectations regarding ethical practices, human rights, environmental management, and legal requirements. The Code of Conduct imposes explicit requirements on suppliers, including a prohibition on the use of forced labor, including but not limited to child labor, a prohibition on requiring supplier employees to pay recruitment fees or other commissions to obtain employment, and the requirement that any third-party recruitment agencies used by a supplier comply with applicable laws and regulations and the Code of Conduct, among other requirements.

The Code of Conduct also requires suppliers to ensure that their workers have the right to refuse unsafe work and to report working conditions that pose unacceptable risks to workers' health or safety. Suppliers must have adequate and impartial systems to handle employee reports and complaints, which protect confidentiality, allow for anonymity of reports (to the extent permitted by law), and protect reporting or affected employees from retaliation. Suppliers must adhere to the more stringent standard in the event of any discrepancies between applicable laws and regulations and the Code of Conduct.

F.lli Giacomello Srl expects that suppliers ensure that their subcontractors and/or suppliers adhere to conditions similar to, but no less stringent than, those contained in the Code of Conduct.

Social Responsibility Guidelines: The Social Responsibility Guidelines are the precursor to the SCC and similarly set out our expectations regarding fair labor requirements, including the prohibition of forced and child labor, healthy and safe work environments, and other social responsibility topics.

Standards of Ethical Conduct for Employees: The Standards of Ethical Conduct for Employees outline expectations regarding ethical behavior and compliance with applicable laws and regulations. Employees of F.lli Giacomello Srl are expected to demonstrate integrity in all relationships, including with suppliers, customers, stakeholders, and other F.lli Giacomello Srl employees.

All reports are handled promptly by the administration and may remain anonymous, unless prohibited by law or regulation. Retaliation against anyone who reports possible misconduct in good faith or participates in an investigation is unacceptable. Anyone attempting to retaliate will be subject to disciplinary action.

Violations of the Code of Ethics, F.lli Giacomello Srl policies, or the law can result in serious consequences for the individuals involved and for F.lli Giacomello Srl.

Anyone who engages in unethical or illegal behavior, and those who offer, attempt to offer, promise, tolerate, approve, or facilitate such behavior, may be subject to disciplinary action, up to and including termination of employment.

GOVERNANCE

F.lli Giacomello Srl's human rights governance structure is defined in the Code of Ethics; according to it, management has ultimate responsibility for compliance with this policy.

F.lli Giacomello Srl's expectations for its suppliers, in accordance with its human rights policy, are defined in the Supplier Code of Conduct (SCC). This approach requires the full integration of supply chain *due diligence* into business processes, including F.lli Giacomello Srl's manufacturing operations and supply chain, as well as the use of human and other resources controlled by the supply chain organization. Accordingly, Supply Chain and Procurement managers are responsible for conducting *due diligence* to ensure that suppliers operate in compliance with the SCC.

III. SUPPLY CHAIN RISK ASSESSMENTS, *DUE DILIGENCE* AND AUDIT

F.lli Giacomello Srl actively monitors risks related to forced and child labor in its supply chains, assesses these risks, and evaluates the effectiveness of its efforts to protect workers and ensure transparency.

F.lli Giacomello Srl is committed to identifying supply chain risks, including modern slavery, before introducing new suppliers.

F.lli Giacomello Srl uses a strong restricted party screening system to identify potentially restricted businesses.

Due diligence reviews with certain new suppliers identified as higher-risk in its supply chains. In line with its sustainability values and aspirations, F.lli Giacomello continuously improves its *due diligence* activities during and after the qualification phase, based on assessments of potential risks of modern slavery and other human rights issues in its supply chains.

F.lli Giacomello Srl pursues Supplier Code of Conduct (SCC) alignment with the small number of direct material suppliers identified as potentially posing higher risk and ensures that the supplier agrees to comply with F.lli Giacomello Srl's SCC or has its own code of conduct that meets the criteria.

IV. TRAINING

F.lli Giacomello Srl recognizes the importance of training its employees and management teams on the risks of modern slavery. Therefore, F.lli Giacomello Srl relies on compliance with applicable laws and regulations.

V. RECLAMATION

F.lli Giacomello Srl did not identify any modern slavery practices in its supply chains in fiscal year 2025 and therefore did not have to take measures to counter these practices or the revenue loss resulting from their elimination. F.lli Giacomello remains steadfast in its commitment to maintaining and improving transparency and integrity in all its operations.

VI. APPROVAL

This statement was approved by the Management of F.lli Giacomello Srl on 09/15/25.

- Full name: Giacomello Daniele
- Title: Legal Representative
- Date: 16th January 2026

• Signature:

