

MODERN SLAVERY STATEMENT

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We are a company specialized in the design, production, and installation of exclusive custom-made design works and environments. Founded in 1985, we have over thirty-eight years of dynamic activity and a global presence in the fields of architecture and design. We operate worldwide through our offices in New York, London, Dubai, Milan, and Sydney, along with other subsidiaries such as Extravega Construction Management and TIS (The Italian Sign).

In our significant production units, around 90% of the spend is made on italian suppliers. Purchasing is centralized and separated into general procurement and procurement of raw materials, including semi-finished goods such as metals and alloys. 2020 was a year of acceleration for Extravega's sustainable sourcing practices. From 2020, Extravega's Code of Conduct and the Supplier Requirements were updated, adding important sustainability elements and requirements for our suppliers.

Corporate responsibility is integrated into all our operations, activities and decision making, from the purchasing of the materials to production and logistics. Extravega's operations are guided by our Code of Conduct to ensure employees live up to Extravega's Ethical Principles, Ways of Working and highest standards of integrity. Extravega complies with international, national and local laws and regulations. Extravega has revised its Code of Conduct and Supplier requirements, incorporating the United Nations Guiding Principles on Business and Human Rights.

Our four key Ethical Principles

- 1. Safe and healthy workplace
- 2. Sustainable future
- 3. Human rights and dignity
- 4. Good corporate citizenship

guide the way we at Extravega act towards our employees, customers, business partners and society. More guidance is given in Extravega's Environment, Health & Safety and Quality Policy, Human Rights Policy, our Corporate Responsibility Policy, Know Your Business Partner Instruction and other company policies and guidelines.



Our Human Rights Policy reflects our commitment to protect and respect human rights. We comply with all national laws and respect international human rights principles, including the United Nations Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, the European Convention on Human Rights, and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. We are committed to the United Nations Guiding Principles on Business and Human Rights, OECD Guidelines for Multinational Enterprises and to the United Nations Global Compact as signatories

to the United Nations Global Compact. We are committed to ensuring that modern slavery, forced and child labor and human trafficking play no part in our supply chain or in any part of our business.

Our Code of Conduct reflects our commitment to acting with high integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure that slavery and human trafficking is not taking place anywhere in our supply chain. There is zero tolerance for any kind of discrimination, whether it is based on ethnic origin, nationality, religion, political views, gender, sexual orientation, disability or age. Extravega wants to know who its business partners are to ensure Extravega is not involved in any unethical, illegal or criminal activities. Policy commitments stipulate human rights expectations of personnel, business partners and other parties directly linked to Extravega's operations, products or services.

Extravega expects that all suppliers and subcontractors must perform according to the laws and regulations of the countries they operate in and meet Extravega Supplier Requirements and Extravega Code of Conduct. Suppliers and subcontractors must strictly condemn and prohibit the use of all forms of forced and compulsory labor and slavery, including child labor and human trafficking.

Over the years, we have established long-standing relationships with many of our suppliers, and we make our requirements and expectations of responsible and ethical business behavior clear in our Supplier Requirements. They are part of our contracts and publicly available on our website https://www.extravega.com/ethical-social-environmental-policy/

Summary of actions in sustainable raw material sourcing taken in 2020 are

Commitment to the UNGP

- Commitment to the United Nations' Guiding Principles of Business and Human rights (UNGP)
- Policy review to reflect this commitment
- Renewed Code of Conduct and Supplier Requirements with emphasis on human rights
- All personnel trained on the renewed Code of Conduct

Human rights / UNGP implementation

- Human rights risk assessment supported by a third party in accordance with the UNGP completed
- Capacity building on human rights in procurement
- Engagement of external experts for assessing suppliers' human rights impacts



• Identification of high-risk suppliers for on-site assessment program with external experts

Supplier requirements and onboarding

- Renewed Supplier Requirements with emphasis on human rights
- Amendment to the Supplier Requirements for raw material suppliers
- Integration of sustainability into our supplier evaluation
- Review of suppliers' onboarding process and intensified human rights due diligence

Supplier monitoring

- Increased resources in supplier sustainability
- Development of incident management process
- Engagement of sustainability platform EcoVadis to assess suppliers
- Supply chain mapping extended to beyond our direct suppliers
- Collection of supplier-specific CO2 emission intensities for selected raw materials started
- Three on site-visits after the ease of travel restrictions
- Preparation for next human rights impact assessment including site visit in Guatemala

To date we have not been made aware of any human trafficking or modern slavery activities within our supply chain, but if any concerns are highlighted to us, we will act immediately in accordance with our legal and ethical obligations.

We have enhanced our entire supplier monitoring. We have reviewed our Supplier Requirements and set a stronger focus on social responsibility and human rights, including the UN Guiding Principles on Business and Human Rights. We integrated sustainability as a criterion in our supplier evaluation and we started to map our supply chain beyond our direct contract partners.

The company regularly trains employees on the Code of Conduct, anti-corruption and other ethics and compliance topics.

Antonio Rillosi

CEO & FOUNDER | Extravega Architectural Fabrications

New York – London – Dubai – Milano – Sydney