

ANTI-SLAVERY & HUMAN TRAFFICKING STATEMENT 2024-25
Financial Year Ending: 2023

Overview

Modern slavery and human trafficking are among the most severe violations of human rights in today's world. Despite significant social and legal advancements, millions of people worldwide continue to be exploited, forced to work in inhumane conditions, or enslaved for economic, sexual, or domestic purposes. This issue primarily affects the most vulnerable, including women, children, and migrants, fueling criminal networks that profit from the suffering of victims.

In this context, collective action is crucial to end this global scourge, protect victims, and prosecute those who exploit human beings.

Our Structure, Business, and Supply Chains

Sydex S.p.A. operates from its headquarters in Ferrandina, providing products throughout the UK and international markets. Our portfolio includes amenities for the hospitality sector, cleaning products, and personal care items. Raw materials, packaging, and related components are sourced from both domestic and international suppliers, primarily in Europe, with only a small portion coming from Asia.

Our Modern Slavery Policies

We are committed to ensuring that every aspect of our operations and supply chains is, as much as possible, free from any form of modern slavery or human trafficking.

To uphold this commitment, we have adopted a zero-tolerance approach to modern slavery and human trafficking within our business operations. These policies reflect our dedication to maintaining high ethical standards and promoting integrity in all commercial relationships. Through the implementation of stringent measures and effective controls, we strive to prevent any form of slavery or human trafficking within our company or supply chains.

All those who collaborate with us, whether employees, clients, suppliers, agents, or consultants, must comply with our policy, which is incorporated into relevant commercial contracts. When customers or suppliers require us to adhere to their Anti-Slavery policies, we carefully examine those policies to ensure they are as rigorous as ours and meet the same integrity standards.

As part of the selection process for new suppliers, adherence to our policies is a fundamental criterion. This is a prerequisite for initiating and maintaining a business relationship with us. If

a supplier prefers to follow their own policies, we ensure they are aligned with our principles and are equally stringent. If they do not meet these requirements, we choose not to collaborate.

In this way, we ensure that our business upholds high ethical standards and helps combat all forms of human exploitation.

This policy is reviewed annually to ensure its effectiveness and alignment with evolving regulations and business needs.

Due Diligence Processes for Slavery and Human Trafficking

To minimize the risk of modern slavery within our business and supply chains, Sydex S.p.A. undertakes due diligence measures, including:

Supplier Risk Assessment: We conduct in-depth assessments of suppliers, focusing on geographic, sectoral risk factors, and their human rights practices and policies.

Supplier Audits: We carry out periodic audits of our suppliers and request evidence of their compliance with our ethical standards. These audits may include on-site visits, inspections, and employee interviews.

Supplier Code of Conduct: All suppliers must adhere to Sydex S.p.A.'s Code of Conduct, which sets expectations related to fair treatment of workers, compliance with local labor laws, and prohibition of forced, bonded, or child labor.

Contractual Obligations: We have incorporated modern slavery clauses into our supplier contracts to ensure their continued compliance with the Modern Slavery Act 2015.

Training and Awareness

We recognize the importance of educating our employees and partners on modern slavery issues. Sydex S.p.A. regularly provides training sessions to all employees, particularly those involved in procurement, supply chain management, and human resources, to raise awareness about the risks of modern slavery and how to identify and report any concerns.

We also encourage all employees to report any potential violations of the Anti-Slavery and Human Trafficking Policy through our confidential whistleblowing procedure.

Risk Assessment and Mitigation

Sydex S.p.A. continuously monitors the potential risks of modern slavery in our supply chains. We have identified higher risks in regions with weak enforcement of labor laws or in sectors where exploitative practices are more common. In response to this:

- We prioritize working with suppliers that have robust ethical policies.

- We engage third-party auditors to review suppliers considered higher risk.
- We annually review our risk management procedures to ensure they remain fit for purpose.

Measuring Effectiveness

To assess the effectiveness of the measures we have implemented, Sydex S.p.A. evaluates key performance indicators (KPIs), including:

- The number of audits conducted and their findings related to modern slavery.
- Supplier compliance levels with our Code of Conduct.
- The number of reports or complaints concerning modern slavery or human trafficking.

We have not identified any cases of modern slavery or human trafficking within our operations or supply chains during the reporting period.

Future Outlook

Sydex S.p.A. remains committed to preventing modern slavery and human trafficking. In the coming year, we plan to:

- Expand the scope of our supplier audits to cover a broader range of risk factors.
- Enhance training programs to involve more employees and key suppliers.
- Further strengthen our reporting mechanisms to ensure concerns can be raised quickly and anonymously.

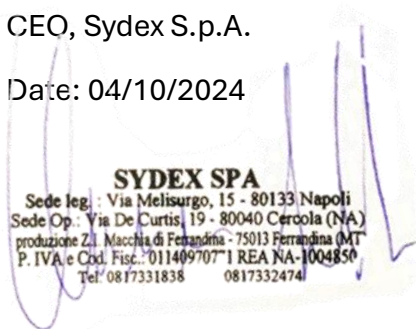
Approval

This statement was approved by the Board of Directors of Sydex S.p.A. on 04/10/2024 and signed on behalf of the Board by:

Massimo Cuollo

CEO, Sydex S.p.A.

Date: 04/10/2024



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