



STERLING

NKE Automation Srl

*Anti-slavery, human trafficking
and illegal labour policy*

NKE Automation Srl, including all its employees, members of the board of directors, related and affiliated companies, respects and upholds human rights in all its business activities and is concerned that they are respected both in the activities and practices of its partners and in the supply network, as provided for in the *Universal Declaration of Human Rights*. The corporate culture is reflected in a series of core values for relations with key stakeholders: customers, manufacturers, suppliers, subcontractors, employees and all team members, so as to bring out our attitude towards the exploitation of people in any form, in particular the offences under the *Modern Slavery Act 2015*.

The commitment is to oppose modern slavery in all its forms, preventing it at any cost and the request to implement the same attitude to all those who work in synergy with NKE and those with whom you have business relationships.

SCOPE AND PURPOSE OF THIS POLICY

According to the *Modern Slavery Act 2015*, modern slavery is a criminal offence and can take place in various forms, including servitude, forced labour and human trafficking, which have in common the deprivation of liberty of one person by another for the purpose of personal or commercial exploitation and gain.

This document sets out NKE's policy with the goal that modern slavery may never manifest itself within the premises or in the supply chain.

As a company, there is zero tolerance for modern slavery: we are committed to acting ethically and with integrity in all our relationships and business dealings.

This Policy applies to all companies, employees, representatives, subcontractors, suppliers and all those who work with NKE worldwide when acting under their employment or contractual relationship with the Company.

RESPONSABILITY

The responsibility for preventing modern slavery and human trafficking lies within the corporate leadership.

The Board of Directors is responsible for ensuring that this policy and its implementation comply with our legal and ethical obligations.

The management at all levels is responsible for understanding and adhering to this policy and that all company personnel receive adequate and ongoing training on it and the issue of modern slavery.

PREVENTION AND COMMITMENT

NKE emphasizes and demands that within the company organization (managers, representatives and employees), as well as subcontractors and suppliers commit to:

- not advocate or resort to child labor, complying with all applicable local laws regarding child labor;
- not use forced or involuntary labor intentionally, including through threat of abuse or abuse of laws or legal process or physical coercion against another person;
- not resort to any form of human trafficking, whether by force, fraud or coercion; or any form of involuntary servitude or slavery; or any form of trafficking in human beings for sexual purposes or procuring sexual acts for profit;

- not destroy, conceal, seize or otherwise deny an employee's access to identity or immigration documents, such as passports or driver's licenses;
- not engage in deceptive or fraudulent practices when hiring employees or offering employment, and to disclose to employees, in a form and language they understand, basic information relating to key terms and conditions of employment, including wages and fringe benefits, place of work, living conditions, any relevant costs to be borne by the employee and, if applicable, the hazardous nature of the work;
- don't charge employees hiring fees and don't use recruiters who don't comply with the local labor laws of the country where the hiring takes place;
- comply with all local laws regarding salary, fringes, and working hours.

REPORT POLICY VIOLATIONS

NKE's goal is to encourage transparency and support anyone who raises genuine concerns under this policy. Allegations relating to potential violations will be treated confidentially and investigated in accordance with the national law that introduced the new Whistleblowing discipline, which requires the adoption of measures to protect individuals who report "violations of national or European Union regulatory provisions that harm the public interest or the integrity of the private entity", of which they have become aware in a work context. These Regulations are integrated with the provisions of the Organizational Model Legislative Decree 231/2001 adopted by the company.

TRAINING AND AWARENESS

This policy and the risk assessments produced are used as a framework for staff training and awareness sessions across the company. It is communicated to all suppliers, contractors and partners at the beginning of the business relationship and reiterated, if necessary, our zero-tolerance approach to modern slavery.

REVISION

The anti-slavery and anti-human trafficking policy will be reviewed periodically by the Board of Directors and may be amended as necessary.

Fulvio FERRERO

CEO

January 2024

