



MODERN SLAVERY ACT POLICY

Cod. PO.06.22

Rev. 0

Data:04.09.2020

Slavery and human trafficking statement for GATTO GROUP

Our Commitment

We are committed to the creation of long-term sustainable value for all our stakeholders, and the respect for fundamental human rights and basic working conditions is a prerequisite for achieving such results.

Our company's global footprint requires the adoption of generally accepted principles in each geographic area where we operate. We are committed to respecting fundamental human rights and basic working conditions in all our operations. We do not tolerate the use of forced or mandatory labor, slavery, involuntary or coerced labor, human trafficking or sex trafficking and seek to promote respect for these principles also by others where we have an influence, particularly contractors, suppliers, and all other entities and individuals with whom it has a business relationship.

Our policy expressly outlines the commitment of GATTO GROUP to prevent human trafficking and slavery in particular from its supply chain, in compliance with the California Transparency in Supply Chains Act, the Human Trafficking Prevention Act, and the UK Modern Slavery Act 2015.

Modern Day Slavery Act Policy

GATTO GROUP recognizes that slavery and human trafficking remains a hidden blight on our global society. The aim of the Company is to identify our responsibility by alerting staff to the risks, however small, in our business and in the wider supply chain. Staff are expected and encouraged to report concerns to management, where they are expected to act upon them this policy applies to all those employed by the Company.

GATTO GROUP activities are varied through multiple disciplined areas and sectors. Consequently, we have a multi-disciplined supply chain to support us through the different aspects and provisions of our business. We are committed to ensuring that there is no modern-day slavery or human trafficking in our supply chains or in any part of our business. Our Code of Ethics reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

This Policy takes into account, and supports, the policies, procedures and requirements documented in our Integrated Management System. The implementation and operation of this management system underlines our commitment to this policy statement. This policy is understood and communicated to all levels of the company through our Human Resources Information System, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the GATTO GROUP activities.

GATTO GROUP is committed to the highest level of ethical standards and sound governance arrangements, and sets high standards of impartiality, integrity and objectivity in relation to the management of its activities.



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Our Supply Chain

The complexity of our supply chain makes it challenging to manage business and sustainability issues. Whilst respecting human rights in the supply chain is ultimately our suppliers' responsibility, as the customer, we expect those in our supply chain to respect our values and to adopt suitable antislavery and human trafficking policies and practices.

Our Whistle blowing policy encourages the reporting of concerns and the protection of whistle blowers.

The company will not knowingly support or deal with any business involved in slavery.

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide training to relevant members of staff.

We fully support the UK Government's objectives to eradicate modern slavery, child labor and human trafficking.

This policy is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement. GATTO GROUP will publish the Modern-Day Slavery Act Policy Statement on our website for the public, employee's, customers, clients, NGOs or investors to view.

Signed by: General Manager Cristian Paravano

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