

2022 Modern Slavery Statement

Ljubljana, 28.06.2023

Application

This Statement constitutes Kolektor Etra's slavery and human trafficking statement (Modern Slavery Statement) for financial year 2022 (ending 31 December 2022), pursuant to Section 54 of the Modern Slavery Act 2015.

Approval

The Board of Kolektor Etra has been briefed on the Modern Slavery Act 2015. Kolektor Etra recognizes that slavery and human trafficking are global issues and acknowledges our responsibility to address the risks within our business and supply chain. We consider that the measures highlighted in this Statement, coupled with our approach to this topic, are helping to reduce the risk of slavery, human trafficking to take place in Kolektor Etra and in our supply chain.

This Statement was approved by Kolektor Etra's Board of Directors on 28th June 2023.

Kolektor Etra's organisational Structure, Business and Supply Chain

Kolektor Etra is a part of Kolektor group. Kolektor is synonym for credibility, trust, quality and innovative products and services. The programs within Kolektor are managed in three strategic groups: Kolektor Mobility, Kolektor Technologies and Kolektor Construction.

Kolektor Etra is a part of Kolektor Technologies and is a manufacturer of power transformers, specialized in production of transformers up to 500 MVA rated power and 420kV. Kolektor Etra performs service activities on transformers from various manufacturers, both on-site and at our own workshop.

Kolektor Etra uses supply chain to deliver essential materials, products, energetics.

Our supply chains are limited and we import products and services from mainly EU countries and some from overseas partners. We conduct due diligence on all new suppliers during onboarding process and on existing suppliers at regular interval to ensure that fundamental human rights and freedoms, including the prohibition of modern slavery and human trafficking, are respected throughout our supply chain. That includes:

- Assessing risks in the provision of particular services,
- Auditing the suppliers, and their health and safety standards, labour relations and employee contracts.

We require all suppliers to attest that:

- They don't use any form of forced, compulsory or slave labour,
- Their employees work voluntarily and are entitled to leave work.

We assess ourselves to have low risk of modern slavery in our business and supply chain.

Policies and Procedures

Regulations in Kolektor Etra and their operation are compliant with international and national legislation, other valid regulations and recommendations of international and national organizations. Kolektor Etra respects the international labor law (regarding working time, occupational health, free trade union work, protection of special categories of workers - younger, older, disabled, parents, employees' representatives, etc.) and other areas in the scope as implemented in the national system by the Republic of Slovenia.

All our values, our business principals, which are ethical, legal, socially responsible and sustainable are written in our Code of conduct.

Our policies do not allow for any form of slavery or human trafficking and we are taking proactive steps to ensure that Modern Slavery is not taking place in any part of our business or supply chains. We will not engage with organisations which facilitate any form of slavery including the use of child labour or forced labour or which do not recognise freedom of association or collective bargaining.

We require that the suppliers and third-parties we work with should hold their own suppliers and third-parties to the same standards. We seek to continually improve awareness of the practices necessary to combat slavery and human trafficking and assess the risk profile of our business in these areas.

Our zero-tolerance approach to Modern Slavery includes our commitment that:

- we will not allow any form of slavery or human trafficking to take place in any part of our business;
- we will not use child labour, nor will we use forced labour;
- we recognise freedom of association by permitting our employees to establish and join organisations of their own choosing without our permission;
- we will recognise collective bargaining where required by local laws;
- we will comply with all relevant laws, statutes and regulations relating to modern slavery;
- we require our suppliers and third-party providers to comply with the above and to hold their own suppliers and third-parties to the same standards;
- we will seek to educate and raise awareness across our business in the identification and reporting of Modern Slavery.

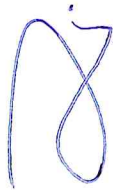
Awareness

Kolektor Etra raises awareness of modern slavery issues by informing employees how to report their suspicions of modern slavery or other human rights violations.

Continuous Improvement

We are committed to continually improving our efforts to combat slavery and human trafficking. This policy is regularly reviewed by the Directors to ensure its effectiveness, alignment with our activities, and compliance with evolving legal requirements.

Dejan Velikanje, director



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Dr. Tomaž Kmecl, director

