

## 2025 Modern Slavery Statement

### Application

This Statement constitutes Kolektor Etra's slavery and human trafficking statement (Modern Slavery Statement) for financial year 2025 (ending December 31st, 2025), pursuant to Section 54 of the Modern Slavery Act 2015 and applies to all companies with capital links to company Kolektor Etra d.o.o..

### 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. We recognize our responsibility to uphold human rights and maintain a zero-tolerance approach to any form of modern slavery.

This Statement was approved by Kolektor Etra's Board of Directors on 5<sup>th</sup> May 2026.

### Kolektor Etra's Organizational 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 relies on its supply chain to deliver essential materials, products, and energy-related resources required for its operations. Our supply chains are relatively limited in scope and primarily consist of suppliers based within the European Union (EU), with a smaller number of partners located overseas.

### 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 international labor standards as implemented within the legal framework of the Republic of Slovenia, including those relating to working time, occupational health and safety, freedom of association, and the protection of vulnerable groups such as young, older, and disabled workers, parents, and employee representatives.

Our core values and business principles—rooted in ethical, lawful, socially responsible, and sustainable conduct—are formalized in our Code of Conduct. This is supported by a broader framework of internal policies and procedures designed to promote integrity and prevent human rights violations across our operations and supply chains.

We maintain a zero-tolerance approach to modern slavery and human trafficking. Our policies strictly prohibit all forms of forced labor, child labor, and exploitation. We are committed to taking proactive steps to ensure that modern slavery does not occur in any part of our business or supply chains. We will not engage with organizations which facilitate any form of slavery including the use of child labor or forced labor or which do not recognize freedom of association or collective bargaining.

We expect our suppliers and third-party partners to adhere to the same high standards. This includes requiring them to apply equivalent principles within their own supply chains. We continue to raise awareness, assess risk exposure, and strengthen controls related to combat slavery and human trafficking.

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 labor, nor will we use forced labor;
- we recognize freedom of association by permitting our employees to establish and join organizations of their own choosing without our permission;
- we will recognize 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.

## **Risk Assessment**

We have implemented measures to identify and mitigate the risk of slavery and human trafficking. These measures include:

- Encouraging the reporting of concerns and providing protection for whistle-blowers;
- Regular auditing and reviewing of practices to ensure employees are paid at least the minimum wage and have the right to work.
- Supplier and Contractor Approval Questionnaires as part of our due diligence process.

This policy aligns with and supports the policies, procedures, and requirements documented in our integrated QEHS Management System, compliant with:

- ISO 9001:2015,
- ISO 14001:2015,
- ISO 45001:2018.

### **Due Diligence**

We conduct due diligence on our suppliers to help ensure that fundamental human rights and freedoms are respected, including the prohibition of modern slavery and human trafficking. This includes supplier assessments during the selection and engagement process and the incorporation of relevant contractual obligations where appropriate.

Based on the nature of our operations, the geographic focus of our suppliers, and the controls in place, we consider the risk of modern slavery within our business and supply chain to be low. Nevertheless, we remain committed to ongoing monitoring and continuous improvement of our practices to ensure these standards are maintained.

### **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.

**KOLEKTOR**

Kolektor Etra d.o.o. 26  
Štandrova ulica 10  
1231 Ljubljana-Črnuče, Slovenija

dr. Tomaž Kmecl, director



