

## Modern Slavery and Human Trafficking Policy

### Introduction

This Modern Slavery and Human Trafficking policy relates to actions and activities during the financial year 1<sup>st</sup> January 2024 to the 31<sup>st</sup> December 2024.

The statement sets down Riello UPS Limited's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

### Organisational structure and supply chains

This policy covers the business activities of Riello UPS Limited, which are as follows: The supply, installation, service & maintenance of Uninterruptible Power Supplies (UPS).

The Company currently operates in the following countries: the United Kingdom and Ireland.

The following is the process by which the company assesses whether particular activities or countries are high risks in relation to modern slavery or human trafficking: Full supplier evaluation, including an agreement to Riello UPS policies, Including, but limited to Slavery and Human trafficking, Financial Conduct, anti-bribery and Ethics policy.

Responsibility for the Company's anti-slavery initiatives is as follows:

- 1.1 Policies: The Managing Director is responsible for creating and reviewing policies. The process by which policies are developed is by following best practices and adapting to the needs of the Company.
- 1.2 Risk assessments: The Compliance Manager is responsible for risk assessments with respect to human rights and modernity by process of supplier evaluation and risk prior to supplier approval.
- 1.3 Due diligence: The Compliance manager is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

### Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all employees to complete on training and renew their training every 3 years..

### Associated Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- 2.1 [Whistleblowing policy](#) - The company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- 2.2 [Ethics policy](#) <<Insert Link>> - The Ethics Policy sets down the actions and behaviour expected of employees when representing the Company.
- 2.3 [Corporate Social Responsibility \(CSR\) Policy](#) <<Insert Link>> - The Company's CSR policy summarises [how we manage our environmental impacts and] how we work responsibly with suppliers and local communities.
- 2.4 [Code of Integrity for Business Partners](#). This policy details Riello UPS's expectations of the behaviour of its suppliers and business partners.

### **Due Diligence Processes for Modern Slavery and Human Trafficking**

The Company undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. The Company's due diligence process includes full supplier assessment, including their policies and adherence to Modern Slavery and Human Trafficking.

### **Performance indicators**

The Company uses the following key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains, including monitoring that all training in modern slavery and Human trafficking is current and all suppliers complete the supplier assessment and statement regarding Modern Slavery and Human trafficking.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Managing Director and the management team endorse this policy statement and are fully committed to its implementation.

### **Policy Review**

This Policy has been authorised and will be regularly reviewed and updated as required by the Managing Director.