

Ethics Policy

1. Purpose

Riello UPS Limited (“the Company”) is committed to conducting its business with **integrity, honesty, transparency, and respect.**

This Ethics Policy sets out the **ethical principles and standards of behaviour** expected of all employees and those acting on behalf of the Company. It provides a clear framework for ethical decision-making and underpins the Company’s commitment to responsible, lawful, and sustainable business practices.

This Policy supports compliance with UK law, ESG principles, and the Company’s certified management systems.

2. Scope

This Policy applies to:

- All employees of Riello UPS Limited
- Directors, officers, and senior management
- Contractors, agency workers, and temporary staff where applicable

Third-party expectations are addressed through the **Code of Integrity for Business Partners.**

3. Ethical Principles

All individuals covered by this Policy must:

- Act lawfully, ethically, and in the best interests of the Company
- Treat colleagues, customers, suppliers, and stakeholders with respect
- Avoid behaviour that could damage trust, reputation, or confidence
- Speak up where unethical behaviour is suspected
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Ethical conduct is a condition of working for or with the Company.

4. Legal and Regulatory Compliance

The Company is committed to full compliance with applicable UK laws and regulations, including (but not limited to):

- UK Bribery Act 2010
- Modern Slavery Act 2015
- Equality Act 2010
- Health and Safety at Work etc. Act 1974
- Data Protection Act 2018 and UK GDPR

Failure to comply with legal or regulatory obligations may result in disciplinary action or other appropriate action.

5. Bribery, Corruption, and Improper Conduct

The Company operates a **zero-tolerance approach** to bribery, corruption, facilitation payments, and other forms of improper conduct.

Individuals must not:

- Offer, give, request, or accept bribes or improper advantages
- Provide or receive kickbacks
- Use charitable or political donations to influence business decisions

All such matters are governed by the **Anti-Bribery and Corruption Policy** and the **Gifts, Hospitality, Donations and Sponsorship Policy**, which must be followed at all times.

6. Conflicts of Interest

Individuals must avoid situations where personal interests conflict, or appear to conflict, with the interests of the Company.

Any actual or potential conflict of interest must be:

- Declared promptly
- Managed transparently
- Approved in accordance with Company procedures

Guidance is provided in the **Conflicts of Interest** provisions within relevant Company policies.

7. Fairness, Equality, and Dignity

The Company is committed to providing a working environment free from discrimination, harassment, bullying, and victimisation.

All individuals must:

- Treat others with dignity and respect
- Support equality of opportunity
- Comply with the **Equality, Diversity and Inclusion Policy** and related procedures

Unacceptable behaviour will not be tolerated.

8. Human Rights and Modern Slavery

The Company respects internationally recognised human rights and has **zero tolerance for modern slavery, forced labour, or human trafficking**.

These commitments are governed by:

- The **Anti-Slavery and Human Trafficking Policy**
- The **Code of Integrity for Business Partners**

Employees must report any concerns immediately.

9. Health, Safety, and Wellbeing

The Company is committed to protecting the health, safety, and wellbeing of employees and others affected by its activities.

All individuals must:

- Take reasonable care for their own health and safety
- Not endanger others
- Comply with the **Health & Safety Policy, Alcohol or Drug Misuse Policy**, and related procedures

Safety is a core ethical responsibility.

10. Information Security, Confidentiality, and Data Protection

The Company is committed to protecting Company, customer, and personal information.

Individuals must:

- Protect confidential and sensitive information
- Use information only for legitimate business purposes
- Comply with the **Information Security Policy, Data Protection Policy**, and related procedures

Unauthorised disclosure or misuse of information may result in disciplinary action.

11. Ethical Supply Chain and Business Partners

The Company expects its suppliers and business partners to operate ethically and responsibly.

Ethical supply-chain standards are defined in the:

- **Code of Integrity for Business Partners**
- **Purchasing Policy**
- **Counterfeit Products and Materials Policy**

The Company reserves the right to review, audit, and disengage from suppliers that do not meet ethical expectations.

12. Speaking Up and Reporting Concerns

The Company encourages individuals to raise concerns where unethical, illegal, or inappropriate behaviour is suspected.

Concerns should be raised:

- With a line manager, or
- Through the **Whistleblowing Policy**, which provides protection against retaliation for genuine concerns raised in good faith

Raising concerns is a responsibility, not a risk.

13. Breaches of This Policy

Failure to comply with this Policy or related policies may result in:

- Disciplinary action (for employees), in line with the **Disciplinary Policy and Procedure**
- Contractual or other action (for non-employees)

Breaches will be investigated fairly, proportionately, and confidentially.

14. Governance and Responsibilities

- The **Managing Director** has overall accountability for ethical governance
- Senior management are responsible for promoting ethical culture
- All employees are responsible for acting ethically and reporting concerns

Ethics is embedded within the Company's **Integrated Management System** and ESG governance framework.

15. Policy Review

This Policy is approved by the Managing Director and will be reviewed regularly to ensure it remains:

- Legally compliant
- Aligned with ISO standards and ESG commitments
- Effective and appropriate to the Company's activities