Modern Slavery and Human Trafficking Statement 2025

Financial Year: 1 January 2025 – 31 December 2025

1. Introduction and Our Commitment

Riello UPS Limited is committed to conducting its business ethically, responsibly and with integrity. We recognise our responsibility to respect and protect human rights and to take appropriate steps to prevent modern slavery, forced labour, servitude and human trafficking within our business operations and supply chains.

We have a zero-tolerance approach to modern slavery and human trafficking and are committed to implementing and maintaining effective policies, procedures and controls designed to identify, assess and mitigate associated risks.

We recognise that modern slavery can occur in any industry or geographical location and that businesses have an important role in identifying and addressing potential risks throughout their operations and supply chains.

This statement describes the measures established by Riello UPS Limited to address modern slavery and human trafficking risks and has been prepared with reference to Section 54 of the Modern Slavery Act 2015.

It relates to the financial year commencing 1 January 2026 and ending 31 December 2026.

2. Our Business and Organisational Structure

Riello UPS Limited specialises in the supply, installation, servicing and maintenance of Uninterruptible Power Supply (UPS) systems and associated critical power infrastructure.

Our activities also include generator systems and associated engineering, installation, technical support and maintenance services.

The company operates in the United Kingdom and Ireland, supporting customers across a broad range of industries where continuity and reliability of electrical power are essential.

Our operations involve employees, contractors, service providers, equipment manufacturers and suppliers.

We recognise that responsible business practices must extend beyond our direct employees to those organisations and individuals contributing to the delivery of our products and services.

3. Our Supply Chains

Our supply chains include manufacturers, distributors, subcontractors and service providers supporting our operations.

These may include:

- Manufacturers and suppliers of UPS systems, generators, batteries and associated electrical equipment.
- Suppliers of engineering components, spare parts and consumables.
- Contractors and subcontractors providing installation, maintenance and specialist engineering services.
- Logistics, transportation and warehousing providers.

- Recruitment agencies and temporary labour providers.
- Facilities management, cleaning and other business support services.

We recognise that modern slavery risks can arise at different stages of the supply chain, including the manufacture of components, sourcing of raw materials, recruitment of workers and delivery of outsourced services.

Riello UPS Limited is committed to working with suppliers and business partners who demonstrate appropriate ethical standards and respect for human rights.

4. Policies and Governance

Riello UPS Limited maintains policies and procedures designed to support ethical business conduct and reduce the risk of modern slavery and human trafficking.

These include:

Modern Slavery and Human Trafficking Policy
Establishes the company's commitment to preventing modern slavery and human trafficking and defines the responsibilities of employees and management.

Whistleblowing Policy
Encourages employees, customers and business partners to report concerns relating to unethical behaviour, including suspected modern slavery or human trafficking.

Ethics Policy
Defines the standards of integrity, honesty and responsible conduct expected of employees when representing the company.

Corporate Social Responsibility Policy
Outlines our commitment to responsible business practices, including our relationships with suppliers, local communities and other stakeholders.

Code of Integrity for Business Partners
Establishes expectations for suppliers and business partners regarding ethical behaviour and responsible business conduct.

The Managing Director is responsible for the creation and review of relevant company policies.

The Compliance Manager is responsible for modern slavery risk assessments associated with supplier evaluation and for due diligence relating to known or suspected instances of modern slavery and human trafficking.

All employees are expected to remain vigilant and report concerns, with management responsible for ensuring that concerns are appropriately addressed.

5. Risk Assessment and Management

Riello UPS Limited recognises that the risk of modern slavery may vary depending on the nature of the goods or services being supplied, the geographical location of suppliers and the employment practices within different industries.

Potential areas of exposure include:

- Manufacturing supply chains involving multiple tiers of suppliers.
- International sourcing of electrical and electronic components.
- Labour-intensive activities such as logistics, cleaning and facilities services.
- Subcontracted engineering and installation activities.
- Recruitment and employment arrangements involving temporary or agency workers.

Our approach to managing these risks includes evaluating prospective suppliers before approval and reviewing existing suppliers.

Supplier assessments consider relevant policies, ethical standards and commitments relating to modern slavery and human trafficking.

Where concerns are identified, they are to be reviewed and addressed through the company's established management and compliance processes.

We recognise that risk assessment is an ongoing activity and that our approach must continue to evolve in response to changes in our operations, suppliers and wider supply chains.

6. Supplier Due Diligence

Riello UPS Limited undertakes due diligence when considering new suppliers and periodically reviews its existing suppliers.

Our supplier evaluation process includes consideration of suppliers' policies and their adherence to relevant ethical and compliance requirements.

These include commitments relating to:

- Modern slavery and human trafficking.
- Ethical business conduct.
- Financial conduct and integrity.
- Anti-bribery and corruption.
- Responsible business practices.

Suppliers are expected to comply with applicable legislation and demonstrate appropriate standards of ethical behaviour.

Where potential risks or concerns arise, the Compliance Manager is responsible for reviewing the circumstances and determining appropriate action in accordance with company procedures.

Our objective is to develop and maintain responsible supplier relationships while reducing the risk of exploitation within our supply chains.

7. Employee Awareness and Training

Riello UPS Limited recognises that employee awareness is an important element in preventing and identifying modern slavery.

All employees are required to complete modern slavery and human trafficking awareness training, with refresher training undertaken every three years.

Training is intended to help employees:

- Understand the different forms of modern slavery and human trafficking.
- Recognise potential indicators of exploitation.
- Understand the risks that may arise within business operations and supply chains.
- Recognise their responsibilities under company policies.
- Know how to raise concerns or report suspected incidents.

Employees are encouraged to remain vigilant and report concerns, however small, so that appropriate action can be considered.

8. Reporting Concerns and Whistleblowing

Riello UPS Limited encourages employees, contractors, suppliers, customers and other business partners to report any concerns regarding suspected modern slavery or human trafficking.

Concerns may relate to our own operations or activities within our supply chains.

Reports should be raised through appropriate management channels or in accordance with the company's Whistleblowing Policy.

All reported concerns will be considered seriously and assessed in accordance with relevant company procedures.

Where appropriate, the company will take action to investigate concerns, address identified risks and cooperate with relevant authorities.

We are committed to encouraging an environment in which individuals feel able to raise legitimate concerns about unethical or unlawful practices.

9. Monitoring and Measuring Effectiveness

Riello UPS Limited recognises the importance of monitoring the effectiveness of its approach to preventing modern slavery and human trafficking.

Our existing policy identifies the following key performance indicators:

Employee Training Compliance

Monitoring the completion and currency of modern slavery and human trafficking training, including the requirement for refresher training every three years.

Supplier Assessment Compliance

Monitoring completion of supplier assessments and supplier declarations relating to modern slavery and human trafficking.

These measures support our efforts to maintain awareness, encourage responsible procurement and identify potential risks.

We will continue to review our monitoring arrangements and consider opportunities to strengthen our approach to assessing and managing modern slavery risks.

10. Continuous Improvement

Riello UPS Limited is committed to continually reviewing and improving its approach to ethical business conduct and the prevention of modern slavery.

Our ongoing priorities include:

- Maintaining employee awareness through training and communication.
- Applying consistent supplier evaluation and approval procedures.
- Reviewing existing supplier relationships and associated risks.
- Encouraging the reporting and appropriate investigation of concerns.
- Reviewing relevant policies to ensure they remain appropriate and effective.
- Strengthening awareness of modern slavery risks across our business activities and supply chains.

We recognise that preventing modern slavery requires ongoing vigilance, effective management and cooperation throughout our supply chains.

11. Approval and Publication

This statement has been prepared in relation to the financial year ending 31 December 2025.

It is intended for publication on the Riello UPS Limited website following approval by the Board of Directors.

The statement will be reviewed annually and updated as appropriate to reflect changes in legislation, business activities, identified risks and the company's approach to preventing modern slavery and human trafficking.

Approved by: Board of Directors, Riello UPS Limited

Signed:



Leo Craig
Managing Director

Date of Approval: 2nd February 2026