

Rehlko Uninterruptible Power (Ireland) Limited (part of the Rehlko Group), is an established and well-respected company with a reputation based upon, passion, quality, innovation, reliability & integrity of power protection products, service excellence and customer satisfaction.

We work with a wide range of customers in a multitude of sectors including financial services, telecommunications, IT, retail, transport, government, power, oil, gas, water, education, medical, leisure and manufacturing industries.

We are committed to delivering exceptional service to our customers in a manner which, where practicable, reduce the impact of our operations on the environment.

This is achieved by following the procedures and processes set out in our management system to ensure we capture and comply with all our company, legal and other regulatory requirements. Furthermore we adopt industry best practices.

POLICY

All our associates will conduct business in an ethical manner in accordance with this Code of Ethical Conduct. Every Associate shares the responsibility of knowing and accepting the principles of integrity and ethical behaviour. We are obligated to understand the basic principles and the specific policies that govern company operations. No one is exempt from practicing these principles.

PURPOSE

We distinguish ourselves by the way in which we handle situations every day on the job. This policy will assist us by spelling out our positions when it comes to appropriate and ethical behaviour.

Our Ethics Stance

The Company's stance is that Ethics is at the centre of our business; Being trustworthy
Being reliable Being respectful Being fair
Being careful

SCOPE

This policy applies to all our Associates.

If a provision of the present policy is contrary to local law, the latter applies in lieu of said provision.

POLICY DETAIL

Associates should review the full policies for further information.

1. Code of Ethical Conduct

1.1 Anti-Bribery

We comply with the Anti-Bribery Laws in every jurisdiction in which we operate. The basic provision of these laws makes it unlawful to pay, offer to pay or receive any money, gift or item of value that in any way can be associated with either the Associate, company or subsidiary obtaining an improper advantage or obtaining/retaining business.

1.2 Anti-Trust & Competition

The Company abides by antitrust laws to preserve and protect fair and open competition. In our relations, contracts, or joint activities with competitors, our Associates are required to fully comply with all antitrust laws. Any practice that violates these laws must be reported immediately.

1.3 Travel and Hospitality

Associates are allowed to pay for reasonable expenses directly related to the

Rehlko

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Registered in Ireland No. 308576

Tel: +353 (0) 1 460 6859 **Website:** www.ups.rehlko.ie

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promotion, demonstration or testing of product or services. When paying for travel/hospitality expenses for current or pending customers, the payment of such expenses shall not be used as an inducement or award for the placement of a customer order or conclusion of business in some other way, such as the award of a contract.

1.4 Respectful Workplace

We are committed to conducting its operations in a manner that protects our people, property, communities and environment by providing a safe, healthy, and respectful work environment.

1.5 Equal Employment Opportunity

It is our policy to provide equal employment opportunity to all individuals regardless of race, creed, colour, religion, gender, age, national origin, disabilities, veteran status, marital status, sexual orientation, gender identity, military status or any other characteristic protected by law.

1.6 Workplace Violence

Violent behaviour or threats of violence of any kind, either implied or direct, are prohibited on our property or at company sponsored events. Such conduct by an associate, customer, contractor or vendor will not be tolerated. We maintain a zero-tolerance standard regarding violence or threats of violence in the workplace.

1.7 Associate Information Privacy

- A. During the course of employment we must collect and maintain certain personal information. The Company will only collect and maintain information which is either required by law or necessary for and related to the Associate's employment.
- B. We are committed to protecting the privacy of personal information and will abide by all applicable data privacy laws and regulations.

1.8 Confidential Information

- A. Associates are obligated not to disclose confidential and proprietary information.
- B. This obligation continues even after associates leave the Company.
- C. Associates may not disclose or use confidential information procured during the course of previous employment at other companies.
- D. It is required that all information be handled in accordance with its sensitivity whether it is labelled confidential or not.
- E. Confidential or sensitive information that is lost, stolen, or released to an unauthorized third party must be reported immediately to the Technology Services Centre, Corporate Labour Relations, Corporate Security or the Corporate IT Security department, as appropriate.

1.9 Safety and Health

We are committed to conducting our operations in a manner that protects its people, property, communities and environment by providing a safe and healthful work environment. Safety measures must be proactive and designed to exceed minimum standards.

1.10 Electronic Communications

- A. Electronic Communications systems are provided for business use.
- B. Electronic Communications are monitored and should not be considered private.
- C. We may install software on computing resources without knowledge or consent of the user.
- D. The Company reserves the right to review and inspect any electronic resources for violations of our policies.

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1.11 Associate Relationships

Associates in close personal relationships may not work in positions where there is a direct, indirect or perceived reporting relationship between the Associates or where one Associate could influence the other's terms and conditions of employment. The same philosophy applies to those relationships with a vendor, supplier, or customer.

- 1.11.1 Reporting: Promptly report any existing or potential close personal relationships that may violate this policy to an HR Representative and/or Labour Relations. They will make a determination and will take whatever action it deems appropriate to resolve the situation.

1.12 Relationships with Suppliers

- A. Associates cannot accept an offering from a supplier that is free of charge or less than market value.
- B. One meal or attendance at an athletic or cultural event of nominal value per year per supplier is acceptable.
- C. Associates may receive generally distributed promotional items which clearly display a corporate logo or advertising.
- D. Gifts not meeting the guidelines must be returned to the donor.
- E. Associates receiving a significant tender must report the circumstances of the proposed gift to an immediate supervisor.

1.13 Relationships with Customers

- A. Payments of any kind by Associates to customers intended to induce sales, purchases or special favours are prohibited. This includes any form of direct or indirect payment for these purposes to the employee of a business, government official or the associate's relatives.
- B. Associates receiving a significant tender must report the circumstances of the proposed gift to an immediate supervisor.

1.14 Political Activity and Contributions

While we encourage Associates to exercise their right to take part in the political process, no officer, supervisor or associate of the company should be asking other associates to participate in any political activities, regardless of how direct or indirect the activities may be. Further, as a general rule, Company funds should not be used to support political parties or candidates for office. This scenario should be reported immediately to an HR representative to avoid possible breach of this policy.

1.15 Conflict of Interest

- A. Business Interests
- B. Business or Consultation Ventures & Other Potential Conflicts
- C. Outside Work Activities

An Associate may be involved in other business activities or hold another job not connected with the Company. The Associate must disclose these situations to his or her manager. A determination will then be made as to whether such activities conflict with the performance of the Associate's responsibilities to us or are inconsistent with the exercise of the necessary time and effort to fulfil such responsibilities. In such cases, it will be necessary for the associate to take action as required to remove the conflict or inconsistency.

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1.16 Sustainability

Recycling and energy conservation, waste minimization and water-reduction practices are integral business requirements. Our products, services, manufacturing methods and facilities incorporate safety and environmental management systems to ensure continuous improvement as well as specific measures to prevent pollution, protect health and safety, and enhance the environment.

2. Exceptions

2.1 No Exemptions

- A. These rules were not made to be broken. No one is exempt from practicing these principles.
- B. If a situation or circumstance needs to be considered, the request needs to be submitted to Human Resources.

3. Reporting a Violation

3.1 Submitting a Report

- A. Make a Report ►
- B. Email ethics.help@rehlko.com
- C. Call the Ethics Helpline using the specific country numbers

3.2 Contacts

- A. Management within the business or staff unit
- B. HR Manager
- C. Rehlko Corporate security

4. Notice to Associates

- 4.1 All locations are required to post the Ethics poster which provides the various ways for an associate to report a violation.
- 4.2 Several e-learning courses are required for every new hire & periodic training may/will be required by management.
- 4.3 Updates to the handbook will be made electronically.

The Managing Director has overall responsibility for ensuring that this policy is complied with. It will be reviewed at least once a year and at such other times as required, to ensure it remains appropriate to the requirements and objectives of our business.



Peter Dowling

Managing Director

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