

MODERN SLAVERY STATEMENT

XP Power Limited (“XP Power” or the “Company”) Modern Slavery Act Statement

At XP Power, we do not engage in any form of slavery or human trafficking activities, and we are strongly opposed to any offences of slavery, servitude, forced labour and/or human trafficking.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the “Act”). It covers the activities of the XP Power and its subsidiaries (the “Group”) in respect of the financial year to 31 December 2024, to prevent slavery or human trafficking in its own business and its supply chains.

Organisational structure, business and supply chains

XP Power is one of the world’s leading developers and manufacturers of critical power control components to the electronics industry. The products we sell globally across the Group are developed and manufactured in the UK, Europe, North America, and Asia. Component parts are sourced from a broad range of international suppliers and these relationships are managed by our supply chain organisation.

We are a full member of the Responsible Business Alliance. XP Power has also adopted the RBA’s Code of Conduct (the “RBA Code”) and works with its key suppliers to ensure they, too, are compliant with the RBA Code.

The Company’s largest UK operating subsidiary is XP PLC, registered in England. The turnover for XP PLC is less than the amount prescribed in the Act which would require a separate statement.

Relevant policies

XP Power operates the following policies that describe its approach to the identification of modern slavery risks and steps taken to prevent slavery and human trafficking in its operations:

Modern Slavery Policy – Our Modern Slavery Policy sets out our commitment and approach to anti-slavery. Any abuse of human rights would be acted upon immediately and appropriate action taken. This policy has been communicated to all employees through our Code of Conduct, is supported by all levels of the organisation.

Human Rights Policy – Our Human Rights Policy, revised in August 2024, defines our commitment to human rights, and affirms the importance of human rights to the Group’s strategy and sustainability. We are committed to respecting human rights in accordance with international human rights principles, including the United Nations Guiding Principles on Business and Human Rights, the UN Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.

This policy includes a number of commitments, which are key for the prevention of modern slavery and human trafficking in our operations or supply chain.

Supply Chain Policy – Our Supply Chain Policy, contains our commitments to upholding environmental and labour standards within our supply chain and is applicable to all suppliers to XP Power, and their employees (whether permanent, fixed term, or temporary), in addition to any other third parties contracted to provide a service to the Group. This policy includes our position on a number of social factors to which we expect our suppliers to adhere, including minimum living wage, non-discrimination, maximum working hours, forced and child labour, health and safety, freedom of association and the right to collective bargaining, harassment and abusive behaviour and living conditions.

Our supporting policies include:

Code of Conduct – The first of our five core values is “integrity” and this is embedded into our Code of Conduct, which sets out to ensure that all our employees and other stakeholders are aware of the values they can expect from XP Power and what is expected from them. Our Code of Conduct covers diversity, modern slavery and human trafficking, health and safety, business integrity and ethics, environment and sustainability. All employees and stakeholders are expected to abide by XP Power’s Code of Conduct.

Whistleblowing Policy – Our whistleblowing procedures enable employees and business partners to report concerns about the application of our Code of Conduct or business practices within the Group. Any issue can be raised either internally, or via XP Power’s confidential whistleblowing programme administered by EthicsPoint, an independent third party. Our ‘Speak Up’ procedure offers a telephone/online helpline which runs in every country we operate in, and in an employee’s chosen language, to guarantee that any experience of legal or ethical misconduct will be heard and acted upon quickly wherever it occurs within the business. Our Audit Committee receives details of any issues raised and how they have been followed up. In 2024, of the five whistleblowing reports, none were related to any form of slavery or human trafficking activities. During 2025, the business will be relaunching our ‘Speak Up’ procedure internally, as we continue to foster an open culture in which our employees feel confident and comfortable in reporting concerns.

Recruitment Policy – Our recruitment policy includes conducting checks on eligibility to work in order to safeguard against modern slavery and human trafficking.

Risk assessment/due diligence processes

We assess the level of risk from our suppliers, to highlight any areas where we may be vulnerable to the risk of modern slavery.

Internal supply chains – We have assessed our internal supply chains and are confident that our control mechanisms ensure that we do not employ anyone who is a victim of modern slavery.

Responsible sourcing – It is important that our suppliers apply the same principles of value, transparency and respect as we do. We require our suppliers to adhere to our Code of Conduct. Our supplier qualification and ongoing audit programme reviews supplier compliance with our Code of Conduct and evaluates suppliers’ performance against the treatment of labour, health and safety and business ethics standards set out in the RBA Code.

As part of our continuous improvement programme, we are reducing our dependency on niche suppliers and therefore the overall number of suppliers we transact with and we are investigating tools that would provide a Supply Chain Sustainability platform, allowing XP to improve the breadth and depth of risk assessments, improve supplier collaboration and the accuracy and speed of sustainability related indicators, including those around human rights.

Conflict materials – We support initiatives and regulations to avoid the use of any conflict minerals, which originate from mining operations in the Democratic Republic of the Congo (DRC) and adjoining countries. These involve tantalum, tin, tungsten and gold. We only purchase our electronic components from reputable sources, and materials such as solder are only purchased from vendors who are on the Conformant Smelter and Refiner Lists. We also obtain information from our suppliers concerning the origin of the metals used in the manufacture of our products. This way, we can assure our customers and ourselves that we are not knowingly using conflict minerals in our products.

We are confident that our existing risk assessment process is fit for purpose, but we will continue to review and improve the process.

Effectiveness/key performance indicators

Our supply chain organisation is responsible for the qualification and ongoing monitoring of our suppliers. Whilst we are satisfied with our current due diligence processes carried out on our suppliers, we will continue to analyse the risk that any suppliers may pose.

Our policy remains that XP Power will disengage with any suppliers found to be non-compliant with our policies.

Training for employees

As part of the onboarding process, new employees confirm that they understand our Code of Conduct and will adhere to it. On an annual basis, all employees refresh their understanding and confirm their adherence to our Code of Conduct by completing our mandatory online Code of Conduct training.

The above statement was approved by the Board of Directors of XP Power Limited on 6 May 2025.

For and on behalf of the Board



Gavin Griggs
Chief Executive Officer