

**MODERN SLAVERY STATEMENT OF**

**MVV Environment Devonport Ltd.**

**Financial Year 2018**

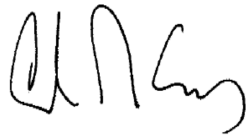
MVV Environment Devonport Ltd. is an indirect subsidiary of MVV Energie AG and a part of the MVV Energie group ("**MVV**").

The board of directors of MVV Environment Devonport Ltd. has considered and adopted the Modern Slavery Statement of MVV, published on its website under [https://www.mvv.de/media/media/downloads/mvv\\_energie\\_gruppe\\_1/nachhaltigkeit\\_1/Modern\\_Slavery\\_Statement\\_MVV\\_Energie\\_AG\\_2018.pdf](https://www.mvv.de/media/media/downloads/mvv_energie_gruppe_1/nachhaltigkeit_1/Modern_Slavery_Statement_MVV_Energie_AG_2018.pdf) , a copy of which is annexed.

Mannheim, 21 December 2018



Uwe Zickert



Paul Carey

Director(s) for and on behalf of MVV Environment Devonport Ltd.

## ANNEX:

### MODERN SLAVERY STATEMENT OF MVV ENERGIE

#### Financial Year 2018

MVV Energie AG is the parent company of the MVV Energie group ("**MVV**"). With around 6,000 employees and sales of Euro 3.9 billion in the 2018 financial year, the publicly listed MVV Energie Group is one of Germany's leading energy companies. For detailed information please refer to our website <https://www.mvv.de/de/investoren/investoren.jsp> .

Pursuant to s.54 of the UK Modern Slavery Act 2015, this statement constitutes MVV's slavery and human trafficking statement ("**Modern Slavery Statement**").

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that MVV has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. MVV has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner and in compliance with applicable laws and regulations, including the Modern Slavery Act 2015.

These include:

1. Our Compliance Management System ("**CMS**") which is intended to ensure that our managers and employees adhere both to legal requirements and to our in-company guidelines and those ethical standards to which we are committed. With our CMS, we safeguard and monitor the statutory and legal conformity of all key business activities and processes within MVV. The most important requirements and all necessary organisational structures and processes are summarised in our Compliance Handbook. The Compliance Handbook explains the manner in which we behave as an organisation and how we expect our employees to act. These also include personnel responsibilities and details of our reporting system. The Compliance Handbook is binding for all direct or indirect controlled subsidiaries and can be downloaded at any time by all employees. Group companies which, due to legal constraints, are not directly bound to it have introduced equivalent CMS processes. An English translation of the Compliance Management Handbook has been prepared for the MVV Energie Group's UK companies, which are being supported and trained by MVV Energie AG. We consistently monitor adherence to our compliance requirements in all business fields,

specialist divisions, group departments and subsidiaries. Employees and third parties can contact an external confidence lawyer or the Compliance Officer via anonymous “Whistleblower Hotlines” and thus directly report any breach or misconduct.

2. We operate also a robust recruitment policy, including job interviews and conducting eligibility to work checks for all employees to safeguard against human trafficking or individuals being forced to work against their will. Non-EU citizens are required to provide the relevant documents that permit them to work in Germany or the UK, e.g. a work permit or a residence permit. Beyond that we have come to the conclusion that our direct business is very unlikely to be affected by modern slavery or human trafficking. Nonetheless we will continue monitoring our internal recruitment processes and if necessary take further appropriate measures.
3. We expect any supplier and their subcontractors to comply with internationally recognized ecological, welfare and social standards. The basis for cooperation with suppliers and service providers is created by the laws, ordinances and compliance requirements in force in Germany, the UK and the EU, as well as by codes of conduct and working practices to which we attach importance. These include, for example, the international conventions of the United Nations (UN), the International Labour Organisation (ILO) and the Organisation for Economic Cooperation and Development (OECD), as well as the UN Global Compact. Within our supplier management system, new suppliers to MVV Energie AG provide disclosures of their efforts to combat corruption, environmental protection factors and social responsibility.

Mannheim, November 2018



Dr Georg Müller

Chairman of the Executive Board



Ralf Klöpfer

Member of the Executive Board



Dr Hansjörg Roll

Member of the Executive Board