

# MODERN SLAVERY STATEMENT OF MVV ENERGIE

## Financial Year 2022

MVV Energie AG is the parent company of the MVV Group ("**MVV**"). With around 6,517 employees and sales of around Euro 4,199 million in the 2022 financial year, the publicly listed MVV Energie AG is one of Germany's leading energy companies. For detailed information please refer to our website <https://www.mvv.de/en/investors>.

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 businesses and supply chains.

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, 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 our businesses and supply chains.

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. MVV's Human Rights Policy, which was updated in June 2020. This reaffirms our full commitment to human rights and fundamental freedoms as set out in numerous international conventions of the United Nations (UN), the International Labour Organization (ILO) and the Organisation for Economic Cooperation and Development (OECD), as well as in the German National Action Plan for Business and Human Rights (NAP). MVV is also committed to the ten principles of the UN Global Compact and has expressed its commitment to the United Nations in August 2017. Our yearly sustainability report summarizes our policies and actions related to human rights, labour, health and safety, anti-corruption and environment, and contains individual statements according to the principles of the UN Global Compact.
2. The establishment of an internal due diligence process in order to identify risks

to human rights, labour rights or health and safety rules stemming from our business activities and to ensure that in case of any risk, this risk is immediately brought to the attention of the relevant business unit, department or subsidiary so that appropriate measures can be taken to avoid the risk materializing and damages occurring. Acquisitions of assets or company shareholdings are also subject to a thorough due diligence process that covers compliance with human rights, labour rights, health and safety rules as well as adherence to compliance related requirements and further sustainability aspects, such as environmental protection.

3. Extending our commitment to human rights to our suppliers. Respect for human rights forms an important component of MVV's procurement terms and is also a key aspect when it comes to selecting suppliers and products. We require our suppliers to adhere to human rights and labour rights as set out in the conventions and documents referred to above as well as in the new German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz - LkSG) which will be applicable to MVV as from 2023. Contracts with suppliers that do not comply and/or do not procure that their supply chains comply with these terms may be terminated and/or the suppliers may be held liable for breach of contract.

MVV's UK companies follow these principles in the same manner as reflected in our UK procurement rules and the terms and conditions under which we contract our suppliers for works or services for our UK business activities.

All companies of MVV Energie group will have access and are expected to actively use a software solution we are going to introduce soon that allows a continuous monitoring of our supply chains and enables us to identify human rights risks as well as other sustainability risks within our supply chains.

4. Our Compliance Management System ("CMS"), which is intended to ensure that our managers and employees adhere both to legal requirements and to our company policies, 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 employees' personal responsibilities and details of our reporting system. The Compliance Handbook is binding for all directly or indirectly 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's UK companies, which are being supported and trained by MVV Energie AG. We consistently monitor adherence to our compliance requirements in all business units, departments and subsidiaries. Employees and third parties can contact an external lawyer in confidence or the Compliance Officer via an anonymous "Whistleblower Hotline" and thus directly report any breach or misconduct.

5. The operation of 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. Notwithstanding these measures, we are of the view that our direct businesses are 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.

Mannheim, January 2023



Dr. Georg Müller  
Chairman of the Executive Board



Verena Amann  
Member of the Executive Board



Ralf Klöpfer  
Member of the Executive Board



Dr. Hansjörg Roll  
Member of the Executive Board