

# Modern Slavery Statement

## June 2026

**E.ON 's statement on modern slavery, which outlines our commitment to making sure our employees and activities are protected from slavery and human trafficking.**

### **E.ON's statement**

This statement is made by E.ON UK Limited (formally known as E.ON UK plc)<sup>1</sup> pursuant to section 54(6) of the UK's Modern Slavery Act 2015 (the "Act") for the financial year ending on 31 December 2025. E.ON UK Limited is part of the E.ON SE Group and adheres to the E.ON Group-wide human rights management approach. References to E.ON in this document refer to the E.ON Group of companies and references to E.ON UK are to E.ON UK Limited.

### **E.ON's structure, business & supply chain**

E.ON UK is one of the UK's largest and most trusted energy suppliers, and a leading provider of infrastructure solutions that deliver clean energy to UK cities and communities. E.ON UK is at the forefront of the transition to new energy; offering a greener future that empowers customers, reduces costs, supports local jobs and helps communities thrive.

E.ON UK is part of the E.ON Group; an international energy company which is focused on Energy Networks, Energy Infrastructure Solutions and Energy Retail.

Global trends like sustainability and climate protection, digitalisation and technological innovation are altering the energy landscape. E.ON's core businesses reflect this: the transformation of yesterday's power lines into tomorrow's smart energy networks and the increasing demand for innovative customer solutions.

Value-enhancing procurement of goods and services is an important requirement for the success of E.ON's business. In all E.ON's procurement processes, E.ON requires human rights to be respected and environmental standards to be maintained throughout the entire supply chain. To this end, E.ON has various policies and management processes in place.

### **E.ON's approach in outline**

E.ON has a commitment to act ethically and responsibly in all its business relationships and has zero tolerance of slavery and human trafficking in any part of its business or supply chain. E.ON supports and is committed to upholding the International Bill of Human Rights, the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization ("ILO") of the United Nations and its fundamental conventions, the European Convention for the Protection of Human Rights, and the principles of the United Nations Global Compact ("UNGC"). E.ON has a wide range of internal policies, standards, and processes in place groupwide to assist in tackling slavery and human trafficking, including:

1. E.ON Code of Conduct and E.ON's Human Rights Statement;
2. E.ON Supplier Code of Conduct, with standards regarding human rights, working conditions, environmental protection, and ethical business practices that E.ON requires its suppliers to meet;
3. General Purchasing Conditions for suppliers to require compliance with the E.ON Supplier Code of Conduct;
4. Defined and monitored onboarding and qualification processes of new suppliers before E.ON engages in business with them;
5. Frequent evaluations of E.ON's top suppliers against key performance indicators;
6. Whistleblowing hotline to enable employees and third parties to report possible violations of the law or of company guidelines or policies;
7. Continued human rights due diligence measures incl. monitoring and reporting requirements under the German Supply Chain Due Diligence Act<sup>2</sup> ("Supply Chain Act").

For further Information about E.ON's responsible business practices please refer to the chapter "Good Governance" in the [E.ON Sustainability Factbook 2025](#) and the "Sustainability Statement" chapter in the [E.ON Integrated Annual Report 2025](#).

### **E.ON's achievements with update for 2025**

E.ON recognises the benefits of upholding standards and continually improving supply chain performance through successful collaboration as follows:

1. [E.ON's Human Rights Statement](#) was updated in 2024, is signed by all E.ON SE Management Board members and the Chief Human Rights Officer and is published on E.ON's website. The statement acknowledges the International Bill of Human Rights and the Declaration on Fundamental Principles and Rights at Work of the International Labour Organisation (ILO) of the United Nations (UN) and its fundamental conventions and provides an overview of risks and measures taken by E.ON. It also refers to E.ON's own guidelines such as the Code of Conduct for employees and the Supplier Code of Conduct for suppliers. E.ON's Code of Conduct, updated in February 2025, obliges all employees to contribute to a non-discriminatory and safe work environment and to respect human rights. The Code of Conduct now includes "What does it mean for me?" sections and a "doing the right thing" integrity test, guiding our colleagues to make the right decisions by showing how it's applied in practice and questions to ask themselves if they are unsure. Other guidelines and policies which apply to all employees, support the implementation of suitable preventative measures. The rules and regulations E.ON follows include the European Convention of the Protection of Human Rights and the Principles of the United Nations Global Compact ("UNGC"). E.ON has participated in the UNGC since 2005. E.ON continually improves its eLearning tool for employees such as the annual training module on compliance, human rights, antitrust law, data protection and cyber security, which was last updated in September 2025. Approximately 89 percent of employees had completed the module by the end of 2025.

<sup>2</sup> Lieferkettensorgfaltspflichtengesetz "LkSG"

2. The Supplier Code of Conduct defines standards for human rights, working conditions, environmental protection, and legally compliant honest business practices that E.ON requires its suppliers to meet. The current version is supplemented by additional requirements from the Supply Chain Act. The E.ON Supply Chain Function Policy describes the mandate and organisational setup of the Supply Chain function. The function encompasses the management of procurement processes, activities, policies, tools, and supplier relationships in compliance with legal requirements and internal regulations, for all E.ON entities to which the policy applies. In addition, the Function Policy (in conjunction with the Supply Chain Handbook) defines Group-wide principles, processes, and responsibilities for non-fuel procurement by the above-mentioned units. Excluded from this are a number of spend categories on an exception list (for example, energy and fuel procurement, financial and real estate transactions, and taxes).

3. Our supply chain management for non-fuel suppliers consists of preventive measures that are interlinked and accompany the supplier in the procurement process. The digital onboarding process for suppliers is carried out before a contract is signed and includes self-registration by the supplier, acceptance of the E.ON Supplier Code of Conduct, compliance, and human rights and health & safety checks. Every non-fuel supplier whose individual transaction volume exceeds €25,000 (per event and spend category) must complete this digital process. Non-fuel suppliers that do not meet this requirement must agree to E.ON's General Terms and Conditions for Purchase Contracts, which are legally binding and enforce minimum Supplier Code of Conduct standards. The purpose of this approach is to minimise potential Health, Safety and Environment (HSE) and Corporate Social Responsibility risks. Suppliers identified as having a higher risk exposure regarding human rights and health & safety are subject to targeted screening and must complete additional measures like specific supplier questionnaires, if required. As of year-end 2025, 99.7 percent of non-fuel suppliers had completed the onboarding process.

Depending on the transaction volume, HSE and human rights risk exposed suppliers are screened by a third-party provider in terms of industry risk, country risk and supplier media alerts. In certain cases, E.ON may take additional steps. These may include a supplier assessment in the form of questionnaires or a supplier audit to check whether the supplier complies with E.ON's standards for human rights, working conditions and environmental protection. E.ON may also require a supplier to have in place a certified environmental management system or a health and safety management system. Suppliers that participate in tenders as part of a Public Procurement Act do not use the process described above. Instead, they follow the qualification procedures required by the applicable country law, which for E.ON UK is the Procurement Act 2023

4. In 2025, E.ON continued to evaluate its suppliers' performance, and based on the findings, made decisions about its relationship with them. E.ON evaluates based on five Key Performance Indicators (KPIs): quality, commercial aspects, delivery, innovation, and corporate sustainability (which includes human rights). Suppliers attend feedback meetings to review results and discuss necessary improvements. Agreed actions are monitored for completion within an agreed timeframe.

5. Periodic risk assessments help E.ON detect actual or suspected violations. If violations occur, the Supply Chain Compliance Officer and the respective Supply Chain Director are notified immediately, and corrective measures are required from the supplier. Implementation is precisely monitored by E.ON. If the situation does not improve, E.ON terminates its business relationship with the supplier

6. The human rights due diligence check covers all of E.ON's procurement categories. In 2025 the human rights due diligence process was updated; integrated into the supplier onboarding platform and supported by an AI-driven risk monitoring solution, shifting the focus from general risk assumptions to supplier specific risk. Potentially high-risk suppliers must pass additional checks, such as a more detailed questionnaire or audit, and agree to make improvements and provide evidence of their implementation.

E.ON uses a digital solution for ongoing risk assessment of suppliers with medium and high human rights risk. They are assessed in a variety of categories, including sustainability, finance, cybersecurity, supply chain disruption and compliance. The digital solution looks at several elements called Points of Interest ("Pols") for example, the holding company of suppliers, branches, plant locations and logistics routes. By end of 2025 more than 7,100 suppliers have been monitored, covering 79% of spend.

7. E.ON continues to monitor and investigate alleged violations of human rights (in accordance with the German Supply Chain Due Diligence Act) that are reported through E.ON's whistleblowing channels and local reporting channels.

8. The role of Chief Human Rights Officer is held by E.ON's General Counsel and Chief Compliance Officer. The Chief Human Rights Officer is responsible for monitoring our human rights risk management system and reports on this to the Management Board on a regular basis. The Sustainability department and the Legal Affairs, Compliance and Security division deal with human rights issues, such as changes in legislation. The Chief Human Rights Officer, depending on the issue, can involve the Sustainability Council (of which he is a member), or the E.ON SE Management Board.

The Human Rights Centre of Expertise is part of the Sustainability and Climate Department, and ensures legal requirements are fulfilled across all divisions of the Group. It implements and maintains our human rights risk management system, conducts periodic risk analyses of our own business as well as our supply chain, reports on them and engages with external stakeholders on topics relevant to human rights. Group Compliance and Data Protection oversees E.ON's group-wide complaint management, including the whistleblowing system, and ensures its operability. Both teams keep the Chief Human Rights Officer informed about current developments and incidents and advise him on upcoming activities and decisions.

9. [The Sustainability Factbook](#) was published for the first time in 2026, for the reporting year 2025. The purpose of the factbook is to provide additional transparency of sustainability reporting beyond regulatory requirements. The factbook includes 'Good Governance' and 'People and Society' chapters, covering topics such as compliance, human rights and supply chain management and diversity, equity and inclusion topics.

10. Possible human rights violations can be reported via E.ON's whistleblowing channels, which are accessible to E.ON employees and outside parties via E.ON's intranet and external websites; details of which are communicated to employees and business partners on a regular basis. A company policy governs the investigation of reports received through the reporting channels, and a simplified version is available to outside parties. The procedure includes a case-by-case assessment in consultation with the Compliance Function. Depending on potential violations, nature and severity, the Chief Human Rights Officer is informed promptly.

Annually, a Group-wide survey of employees is conducted to assess their familiarity with the procedure and their views on how reports are handled. The survey's findings show that employees are familiar with whistleblowing channels and that reports are taken seriously and processed appropriately.

11. In 2025, E.ON UK implemented an Active Bystander training program, aimed at strengthening awareness of sexual harassment, and empowering colleagues to respond properly to inappropriate or unethical behaviour. The training enables early identification and escalation of inappropriate behaviours and reinforces speak up culture.

12. Vision 0, launched in 2025, is E.ON's ambition to prevent workplace accidents and promote health and wellbeing of all employees, and contractors' employees. It reaffirms E.ON's commitment to completely avoid serious and fatal occupational accidents and illnesses.

In May 2025 E.ON UK introduced a safety culture survey, to give insight into colleague perception of health and safety arrangements, resulting in several improvement activities with particular focus on health and safety procedures, incident reporting and building knowledge of health and safety responsibilities.

### **Plans for 2026**

Activities proposed for 2026 include:

- a. E.ON UK will continue to deliver Active Bystander Training to colleagues at all levels of the organisation.
- b. Annual mandatory eLearning on compliance, human rights, antitrust law, data protection and cyber security for all E.ON employees;
- c. The development and introduction of Inclusive leadership training for executives across E.ON;
- d. An E.ON Group Wide Safety Stop Day; a commitment to Vision 0, to keeping every colleague, contractor and customer safe and well.
- e. Preparation for the introduction of the European Corporate Sustainability Due Diligence Directive, which will replace the German Supply Chain Act (LkSG). General processes will remain in place to comply with due diligence obligations and to meet the requirements of other regulations.

Health, safety, and environment events will be in focus throughout 2026 for E.ON employees and contractor representatives following the launch of the Vision 0 campaign in 2025. The aim of these events is to reinforce awareness of the importance of these topics to E.ON, both generally and for individual projects as well as to design specific action plans for joint improvement initiatives in relation to the products and services a particular contractor or subcontractor provides. The events also serve as a forum for sharing best practice and communicating E.ON's standards and policies.

## **E.ON's continued commitment**

E.ON will continue to review its policies and processes in relation to the prevention of modern slavery and human trafficking in its business and supply chain, strengthening these where necessary to ensure continued alignment with the Act.

E.ON will also continue to train all employees on, and ensure compliance with, its Code of Conduct and will identify additional training needs where necessary.

This statement has been approved by the E.ON Human Rights Officer and E.ON UK Board of Directors on behalf of E.ON UK in June 2026. A new statement will be published each year on the website.



**Chris Norbury**

**Chief Executive Officer, E.ON UK Limited**

**June 4, 2026**

1 Which includes the following E.ON companies qualifying under the criteria of the UK Modern Slavery Act 2015:

E.ON UK Limited (formally known as E.ON UK plc)

E.ON Energy Solutions Limited

E.ON UK Energy Markets Limited

E.ON Control Solutions Limited

E.ON UK Steven's Croft Limited

E.ON Next Energy Limited

E.ON UK Infrastructure Services Limited

Npower Commercial Gas Limited

E.ON UK Green Funding Solutions Limited

Kemsley CHP Limited

To view E.ON's previous statements please click here: <https://www.eon.com/en/about-us/sustainability/guidelines.html>