

Slavery & Human Trafficking Statement

June 2025

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

E.ON's statement

This statement is made by E.ON SE as the ultimate holding company of the E.ON Group ("E.ON")¹, pursuant to section 54(6) of the UK's Modern Slavery Act 2015 (the "Act") for the financial year ending on 31 December 2024.

E.ON's structure, business & supply chain

E.ON is 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 UN Guiding Principles on Business and Human Rights and the core labour standards set out by the International Labour Organisation. 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 Act² ("Supply Chain Act").

For further Information about E.ON's responsible business practices please refer to the chapter "Human Rights and Supply Chain Management" in [the E.ON Integrated Annual Report 2024](#).

E.ON's achievements with update for 2024

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 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 suppliers. E.ON's Code of Conduct obliges all employees to contribute to a non-discriminatory and safe work environment and to respect human rights. 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 2024. More than 87 percent of employees had completed the module by the end of 2024.
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. E.ON trained its Supply Chain employees on respect for human rights along the supply chain, new aspects of onboarding, and E.ON's risk matrix for human rights.

² Lieferkettensorgfaltspflichtengesetz "LkSG"

4. 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, a pledge to comply with the E.ON Supplier Code of Conduct and a compliance check. Every non-fuel supplier whose individual transaction volume exceeds €25,000 (per event and spend category) must complete this process. Non-fuel suppliers that do not meet this requirement must agree to E.ON's legally binding General Terms and Conditions for Purchase Contracts. The purpose of this approach is to minimise potential Health, Safety and Environment (HSE) and Corporate Social Responsibility risks. As of year-end 2024, 99.6 percent of non-fuel suppliers had completed the onboarding process.

Depending on the transaction volume and HSE risk, suppliers must answer at least one questionnaire. In certain cases, E.ON may take additional steps. These may include 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.

5. In 2024 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.

6. 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. No business relationships were terminated for this reason in 2024.

7. The human rights due diligence check covers all of E.ON's procurement categories. 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. In 2024, more than 5,300 new and existing suppliers answered the questionnaire, including all high-risk suppliers. Suppliers that have difficulty answering the questionnaire or providing evidence of their measures are supported and closely monitored.

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. Since the program was introduced, over 5,700 Pols have been monitored on an ongoing basis, covering 72 percent of E.ON's annual spend with suppliers.

8. In 2024, eleven alleged violations of human rights were reported through the Group wide whistleblowing channels and local reporting channels. The investigations found that in each case the allegations were unfounded and therefore not a violation of human rights.

9. 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, and reports on them. It is also responsible for Group-wide complaints management and exchanges information with external stakeholders on topics relevant to human rights. In addition, it keeps the Chief Human Rights Officer informed about current developments and incidents and advises him on upcoming activities and decisions.

Plans for 2025

Activities proposed for 2025 include:

- a. Roll out annual mandatory e-learning on compliance, human rights, antitrust law, data protection and cyber security for all employees;
- b. 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 continue to be conducted throughout 2025 for E.ON employees and contractor representatives. 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 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 SE Board of Directors on behalf of E.ON in June 2025. A new statement will be published each year on the website.

Dr. Ing. Leonhard Birnbaum

Chief Executive Officer, E.ON SE

June 17, 2025

A handwritten signature in dark ink, appearing to be 'L. Birnbaum', written over a light blue horizontal line.

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

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 Heat 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>