

# Modern Slavery Statement 2024

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**Modern Slavery Statement V1.0**

Published on 15 February 2025

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# 1. Foreword

Download the **EnBW Human Rights Declaration** from our website  
(PDF, 115 KB, english)

Online ↗

As an integrated energy supply company, long-term business success and socially and environmentally responsible activities go hand in hand at EnBW Energie Baden-Württemberg AG (EnBW). Exercising our human rights due diligence is one of EnBW's core values and is firmly enshrined in our corporate strategy. It plays a major role in every corporate decision. Our commitment to the respect of human rights forms the basis of every decision taken by the company. We have been a member of the United Nations Global Compact since 2010 and are committed to respecting the ten principles including human rights and internationally recognized labor standards in accordance with the UN Guiding Principles on Business and Human Rights.

EnBW has been striving to fulfill its responsibilities with respect to human rights due diligence in its business activities for many years. We have gradually improved our processes over the years and will continue doing so in future, while always scrutinizing the potential and limitations of our actions.

To reaffirm this commitment, EnBW is now for the first time publishing this statement on modern slavery, forced labour, servitude or human trafficking which relates to the financial year ending 31 December 2024 and is published pursuant to section 54 of the UK's Modern Slavery Act 2015. Through its activities listed in this statement, EnBW makes every effort to prevent its supply chains or part of its own business from slavery and human trafficking and outlines the approach to assessing and managing the risk of modern slavery in relation to our business and supply chains as part of our endeavor to eliminate forced labor, slavery and human trafficking.

This modern slavery statement is published for EnBW Energie Baden-Württemberg AG and all companies that are controlled by EnBW Energie Baden-Württemberg AG. These are generally the companies in which EnBW Energie Baden-Württemberg AG directly or indirectly holds the majority of shares or voting rights. Among others, this also includes the EnBW UK Limited, EnBW Generation UK Limited and EnBW UK Renewables Limited. Majority shareholdings over which EnBW Energie Baden-Württemberg AG has no controlling influence are requested to respect this statement and act accordingly.

Karlsruhe, Germany, 15 February 2025



**Dr. Georg Nikolaus Stamatelopoulos**  
Chief Executive Officer

A handwritten signature in dark ink that reads "Georg Stamatelopoulos".



**Thomas Kusterer**  
Chief Financial Officer

A handwritten signature in dark ink that reads "Thomas Kusterer".

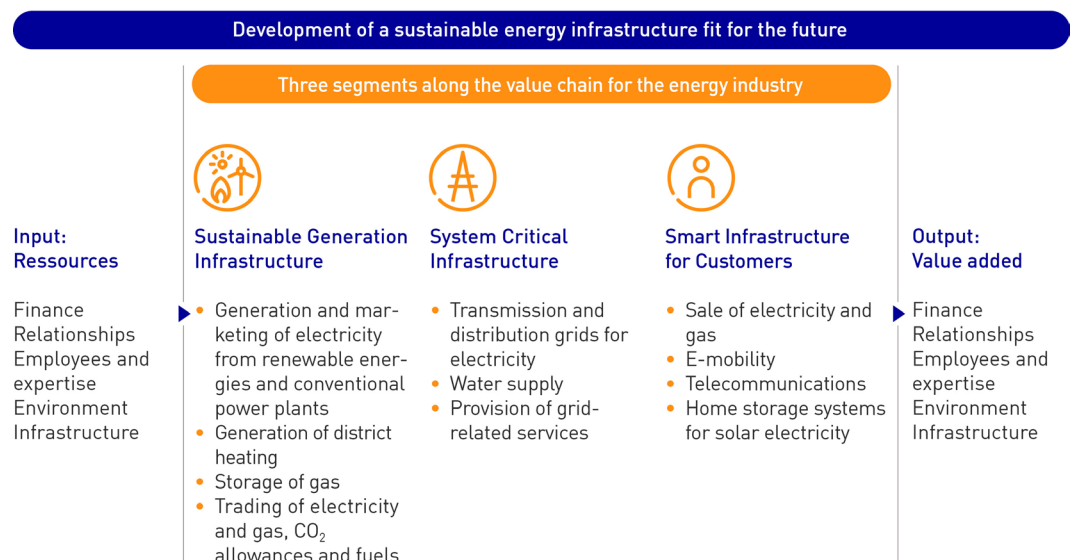
## 2. Business Model

Our company is transforming itself from an energy supply company into a sustainable and innovative energy supply company, also outside of the energy sector. Sustainability is an important element of our business model and acts as a compass for our strategic alignment. We draw on a variety of resources – from finances through to infrastructure – for our corporate activities. As a result of the efficient use of these resources, we create value for ourselves and our stakeholders.

EnBW is organized according to the model of an integrated company. EnBW is managed through business units and functional units: Core operating activities along the entire energy industry value chain are concentrated in the business units. The functional units carry out Group-wide support and governance tasks. The EnBW Group consists of EnBW as the parent company and 256 fully consolidated companies, 25 companies accounted for using the equity method and 3 joint operations. EnBW is operating in Germany as with various subsidiaries also in selected foreign abroad. As of 31 December 2023, the EnBW Group had 28,630 employees.

Our business portfolio is split into three segments that encompass the following activities:

### Business model



- The Sustainable Generation Infrastructure segment encompasses our activities in the areas of renewable energies and conventional generation, district heating, waste management and energy services. In order to guarantee the security of supply, we also maintain the power plants that have been transferred to the grid reserve. In addition, this segment includes the storage of gas and the trading of electricity, gas, CO<sub>2</sub> allowances and fuels, as well as the direct distribution of renewable energy power plants.
- The transmission and distribution of electricity and gas are the main components of the System Critical Infrastructure segment. The activities of our grid subsidiaries in this segment are designed to guarantee the security of supply and system stability. The provision of grid-related services and the supply of water are other activities in this segment.
- The Smart Infrastructure for Customers segment comprises the sale of electricity and gas, the provision and expansion of quick-charging infrastructure and digital solutions for electromobility, activities in the telecommunications sector and other solutions at a household level such as photovoltaics and home storage systems.

### 3. The EnBW Board of Management's commitment to respecting Human Rights

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(PDF, 115 KB, english)

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Download the **EnBW Code of Conduct** from our website  
(PDF, 1.8 MB, english)

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Download the **EnBW Supplier Code of Conduct** from our website  
(PDF, 737 KB, english)

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Download the **Principles of Conduct for the Responsible Procurement of Coal and Other Raw Materials** from our website  
(PDF, 152 KB, english)

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Download the **EnBW Policy Statement** from our website  
(PDF, 914 KB, english)

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As an energy supplier and infrastructure provider, both our own business activities and those of our business partners and suppliers have an impact on the lives of people in different countries. EnBW respects and is mindful of the human and labor rights of its employees as well as anyone directly or indirectly affected by its business activities and is committed to ensuring that its business partners also respect human rights and do not violate them.

We have been a member of the United Nations (UN) Global Compact since 2010 and are committed to respecting human rights and internationally recognized labor and environmental standards in accordance with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines on Multinational Enterprises. We are actively involved in federal government initiatives, such as the Energy Sector Dialog, which, as part of the of the German National Action Plan for Business and Human Rights (NAP), aim to improve the human rights situation along the supply and value chains in Germany and throughout the world. With

- The [EnBW Code of Conduct](#),
- The [EnBW Supplier Code of Conduct](#)
- The [Principles of Conduct for the Responsible Procurement of Coal and Other Raw Materials](#) and
- The [EnBW Human Rights Declaration](#)

we have set out our principles in relation to human rights and the environment and defined what we expect from our employees, suppliers and business partners with regard to our own business activities and value creation within the supply chains. In doing so, we have closely adhered to the following frameworks:

- [The Universal Declaration of Human Rights](#) (PDF, 191 kB, english)
- [The International Covenant on Civil and Political Rights](#) (PDF, 248 kB, english)
- [The International Covenant on Economic, Social and Cultural Rights](#) (PDF, 80 kB, english)
- [The core labor standards of the International Labor Organization \(ILO\)](#) (external website, english)
- [The UN Guiding Principles on Business and Human Rights](#) (PDF, 1.1 MB, english)
- [The OECD Guidelines on Multinational Enterprises](#) (external website, english)

## 4. Human Rights Due Diligence Obligations

Download the [Report On The Supply Chain Due Diligence Act](#) from our website  
(PDF, ~4 MB, german)

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Download the [EnBW Policy Statement](#) from our website  
(PDF, 914 KB, english)

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Download the [EnBW Human Rights Declaration](#) from our website  
(PDF, 115 KB, english)

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(PDF, 1.8 MB, english)

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In addition to the duty of states to protect human rights, the UN Guiding Principles on Business and Human Rights emphasize the responsibility of companies to respect human rights. Based on this the German government has introduced binding rules for how companies should exercise human rights due diligence in the German Supply Chain Act (LkSG), which also includes modern slavery and human trafficking.

In the last two years, we worked intensively on implementing the requirements of the German Supply Chain Act. EnBW takes this responsibility seriously and has revised its human rights risk management system on the basis of the already existing structures and processes. The entire Executive Board bears overall responsibility for compliance with the requirements of the LkSG. One of the main tasks in 2023 was analyzing our processes to identify and prioritize risks in our own business areas and along our supply chains and implementing targeted measures to ensure compliance with human rights due diligence. We have, for example, integrated an automated risk evaluation process into our supplier management system that allows us to directly consider risks relating for human rights in the selection of suppliers and take appropriate preventative measures. As a result, we submitted the [report on the Supply Chain Due Diligence Act](#) to the Federal Office of Economics and Export Control (BAFA) on 7 August 2024 and published it on our website on 19 August 2024. The BAFA-report is binding on EnBW Energie Baden-Württemberg AG in its own business area as well as on all Group companies over which EnBW Energie Baden-Württemberg AG exercises a decisive influence.

To ensure that we can develop and implement targeted and effective measures, we have also established a Human Rights Steering Committee. In October 2023, we published a [policy statement](#) which describes the risks we have identified and prioritized and the measures we are taking to further minimize these risks. Our aim is to work even more closely together with our suppliers for this specific purpose and to keep the identified risks as low as possible from the outset, while continuing to improve the situation for people along our supply chain.

It is for this reason that we participate in stakeholder initiatives such as [econsense](#), the [Energy Sector Dialog](#), the [Responsible Commodities Sourcing Initiative](#) (RECO SI) and [Solar Power Europe](#) to help us maintain and refine our approaches and level of ambition in cooperation with other companies and relevant stakeholders.

## EnBW's risk analysis process

EnBW is working continuously to standardize its risk analysis process.

**In the first step** of the risk analysis, EnBW defined the details of the type and scope of its own business activities and business relationships within the supply chain along its corporate structure and the associated procurement structure to ensure they are transparent:

- In terms of EnBW's own business area, the segments of its integrated value added as an energy company and infrastructure provider (in the areas of generation, grids and sales) are relevant. This includes all companies and sites over which EnBW exercises a decisive influence.
- EnBW has structured its purchasing according to the procurement category and the associated sourcing countries.

Where transparent information on the procurement category was available, the required supply chain transparency was documented. This documentation includes information on the direct suppliers for every product, main components of the products, the materials used and the raw material required for them. Where possible, potential countries of origin and production were identified for every stage of the supply chain for a product.

**In the second step**, EnBW identified abstract risks, in particular the sector specific and country specific risks associated with EnBW's own business activities, with the sites within the segments as well as with the activities of its business partners and suppliers in the respective procurement category and country.

The following sources were used as a basis for the analysis:

- Internal and external sources such as reporting systems, studies and databases, discussions and/or cross-functional risk workshops as part of the integrated risk management process and
- Dialog with internal responsible persons from the relevant areas within the Human Rights Steering Committee.

**In the third step**, the analysis was successively expanded to determine, weight and prioritize specific risks. This made it possible to assess the plausibility of the results of the previous abstract risk evaluation process at the level of the companies and sites, as well as at the level of business partners and suppliers. The criteria "severity," "likelihood of occurrence" and "extent to which they contribute to the cause" were appropriately weighted and prioritized.

- Relevant issues and evaluation criteria were integrated into the existing risk management system for our own business area. The aim was to acquire more detailed knowledge of the specific risks at individual companies and sites so that they could be prioritized. Relevant departments such as occupational health and safety, environmental protection and human resources produced risk descriptions and a categorization of the already existing preventative measures.
- A more in-depth analysis was carried out on the supply chains in the previously identified procurement categories with a higher risk potential. EnBW is continuously working to improve its supply chain transparency. At a supplier management level, EnBW has implemented an automated risk evaluation process that makes it possible to take any human rights such as modern slavery and human trafficking directly into consideration in the selection of suppliers and on this basis also to take appropriate preventative measures.
- As part of the procurement process for coal and gas for its own power plants, EnBW has been carrying out a comprehensive business partner audit for many years and monitoring the risk profile and the implementation of preventative measures for all business partners with whom it concludes direct contracts.

The following events could trigger an event-driven risk analysis:

- Findings from the evaluation of reports from the complaints procedure.
- Substantiated knowledge of actual evidence indicating that an indirect supplier may have violated human rights such as modern slavery or human trafficking.
- Significant changes within EnBW's business activities that are expected to lead to a change in the risk situation.

## EnBW's expectations towards suppliers

Suppliers are required to provide a self-assessment via a supplier portal on whether they have measures in place in the areas of environmental management, occupational health and safety, the respect for human rights such as modern slavery and human trafficking, the fight against corruption, data protection and quality management. Established in 2014, "[EnBW's rules of conduct governing the responsible procurement of hard coal and other raw materials](#)" form a basis of shared values and represent an important criterion when selecting raw material suppliers. All business partners with whom EnBW concludes direct contracts for the purchase of raw materials are carefully audited as part of a comprehensive business partner audit. In addition to environmental issues, the main focus is on compliance with internationally recognized human rights standards, including the prevention of modern slavery and human trafficking. No business contracts are concluded with business partners who are identified with a high risk profile.

EnBW attaches great importance to selecting suppliers very carefully, particularly when procuring solar and photovoltaic products. Only suppliers who can prove that they address the risk of slavery and forced labor in their supply chains and implement appropriate preventive measures are selected. In the course of supplier dialog, possible approaches towards mitigating the identified risks are continuously discussed with direct suppliers, including tracing the origin of individual components.

EnBW introduced its "[Supplier Code of Conduct for business partners of EnBW](#)" (SCoC) in 2021 based on the international principles described above as a shared set of values and a criterion for the selection and development of our suppliers. More than 98 percent of suppliers (measured by procurement volume) have accepted the SCoC as the basis for cooperation with EnBW. A transfer clause ensures that our suppliers adequately address and pass on the human rights expectations including modern slavery and human trafficking along the supply chain. Control mechanisms are also contractually regulated by the Supplier Code of Conduct.

## Complaints mechanism

EnBW has its own [complaints procedure](#). Through various channels compliance violations or suspected cases (e.g. fraud, discrimination, human rights and environmental violations) can be reported. The complaints procedure is accessible to persons within the company and also external parties, irrespective of whether they are impacted personally. The whistleblower tool has a telephone hotline that is available at all times (24/7) and an online form for submitting complaints in text form. Complaints can be submitted there in more than 50 languages. Whistleblowers can also submit reports to the compliance department by telephone, in person or by e-mail.

Download the [Principles of Conduct for the Responsible Procurement of Coal and Other Raw Materials](#) from our website  
(PDF, 152 KB, english)

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Download the [Rules of procedure for the complaints mechanism of the EnBW Group](#) from our website  
(PDF, 305 KB, english)

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Concerns can not only be reported using the digital whistleblower tool but also to an external ombudsman at any time.

Whistleblowers are also free to submit their complaints anonymously. The complaints are handled in accordance with a standardized and confidential process. The complaints procedure and the relevant responsibilities are defined and published in the “[Rules of procedure for the complaints mechanism of the EnBW Group](#).”

## Monitoring

The implementation of the human rights due diligence obligations is monitored by the EnBW’s risk and compliance processes, internal control processes and internal audits. The control processes and complaints procedure did not identify any issues related to modern slavery or human trafficking.

In addition, some EnBW companies have their own channels for reporting potential grievances or violations.

# 5. Training

All employees are obligated to conscientiously comply with the guidelines applicable to them and appropriately exercise human rights due diligence with respect to human rights including modern slavery and human trafficking in their respective departments. E-learning courses, training courses and committee meetings are used to raise the awareness of relevant management and specialist personnel in the affected departments for human rights themes including modern slavery and human trafficking. There are committees for sharing information and knowledge about compliance, human rights, equity, anti-discrimination, human resources, occupational health and safety and environmental issues.

# 6. Conclusion

EnBW has been striving to fulfill its responsibilities with respect to human rights due diligence in its business activities for many years. We have gradually improved our processes over the years and will continue doing so in future, while always scrutinizing the potential and limitations of our actions.

## About this report

Find out more about EnBW's **sustainability reporting** on our.

Website ↗

Find out more about EnBW's **sustainable supply chain** on our.

Website ↗

This statement modern slavery and human trafficking is the first one of its kind published by EnBW AG. It relates to the reporting year ending 31 December 2024 and is published pursuant to section 54 of the UK's Modern Slavery Act 2015. We are improving the underlying processes both continuously and in response to certain events. If we identify any changed or enhanced risks, we will take them into account in future reporting periods. No rights for individuals or third parties can be derived from it.

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### Version

Modern Slavery Statement V1.0

According to reporting year 2024

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Companies registered office: Karlsruhe, Germany

Local court Mannheim · HRB no. 107956

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Board of management: Dr. Georg Stamatelopoulos (Chairman),

Thomas Kusterer (Deputy Chairman), Dirk Güsewell,

Peter Heydecker, Colette Rückert-Hennen