

EnBW Modern Slavery Act Statement Financial Year 2025

Content

I	Foreword	3
II	Business Model	4
III	The EnBW Board of Management's commitment to respecting Human Rights	5
IV	Human Rights Due Diligence Obligations	6
	1 EnBW's risk analysis process	7
	2 EnBW's expectations towards suppliers	8
	3 Complaints mechanism	8
V	Training	9
VI	Management and evaluation	10
VII	About this report	11

I Foreword

EnBW is one of the largest integrated energy companies in Germany and Europe, and supplies electricity, gas, water and heat together with products and services related to energy and infrastructure to its customers. At EnBW, we understand that long term business success and socially and ecologically responsible behaviour are inseparable. Exercising our human rights due diligence is one of EnBW's core values and is firmly enshrined in our corporate strategy. Our responsibility in relation to human rights forms the basis of every decision taken by the company. EnBW has been member of the United Nations Global Compact since 2010 and is committed to respecting human rights and internationally recognizes 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 publishing this statement on modern slavery, forced labour, servitude or human trafficking for the second time. This statement relates to the financial year ending 31 December 2025 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 as well as for all domestic and foreign majority shareholdings that can be instructed by EnBW AG by means of a domination agreement or in another legal manner. Among others, this also includes EnBW UK Limited, EnBW Generation UK Limited and EnBW UK Renewables Limited. The other majority shareholdings of EnBW AG, which are de facto controlled, are requested to respect this statement and act accordingly.

Karlsruhe, 15 June 2026
EnBW Energie Baden-Württemberg AG



Dr. Georg Stamatelopoulos
(Chairman)



Thomas Kusterer
(Deputy Chairman)

II Business Model

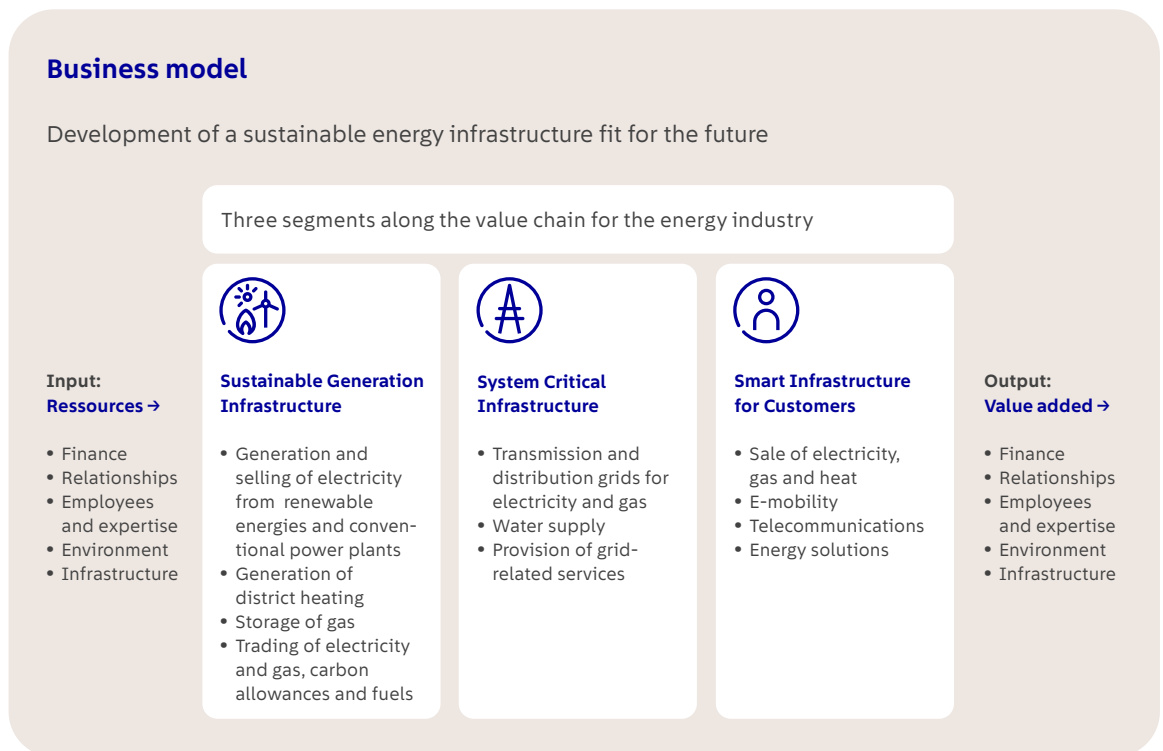
Find out more about EnBW's Sustainability Agenda here.

[Online ↗](#)

EnBW is one of the largest integrated energy companies in Germany and Europe, and supplies electricity, gas, water and heat together with products and services related to energy and infrastructure to its customers. Sustainability is an important element of our business model and our strategy. Our [Sustainability Agenda](#) acts as a compass to clearly guide our future 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 follows an integrated company model and operates through different business and functional units: The core operating activities along the energy industry value chain are mapped in the business units. The functional units perform Group-wide support and governance tasks. The EnBW Group consists of EnBW as the parent company and 590 fully consolidated companies, 25 companies accounted for using the equity method and 3 joint operations. EnBW operates in Germany and has subsidiaries in selected foreign countries. As of 31 December 2025, the EnBW Group had 31.541 employees.

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



The Sustainable Generation Infrastructure segment comprises our activities in the areas of renewable energies and conventional generation, district heating, waste management and energy services. In order to ensure supply security, we also maintain the power plants that have been transferred to the grid reserve. In addition, this segment includes the trading of electricity, gas, carbon allowances and fuels, the storage of gas and the direct selling of renewable energy power plants.

The transmission and distribution of electricity and gas form the main components of the System Critical Infrastructure segment. The activities of our grid companies in this segment are designed to ensure supply security and system stability. Further activities in this segment include the provision of grid-related services and the supply of water.

The Smart Infrastructure for Customers segment comprises the sale of electricity and gas, the provision and expansion of fast-charging infrastructure and digital solutions for e-mobility, activities in the telecommunications sector and other solutions at a household level, such as photovoltaics and home storage systems.

III The EnBW Board of Management's commitment to respecting Human Rights

Find out more about EnBW's **Code of Conduct** here.

[Online ↗](#)

Further information on EnBW's **Supplier Code of Conduct** can be found here.

[Online ↗](#)

Find out more about the **rules of conduct on the procurement of raw materials** here.

[Online ↗](#)

Further information on the **Declaration of Human Rights** can be found here.

[Online ↗](#)

As a sustainable and innovative infrastructure partner, 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 have committed ourselves 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 for Multinational Enterprises. We actively engage in German government initiatives, including the Energy Sector Dialogue. This initiative, as part of the National Action Plan for Business and Human Rights (NAP), aims to improve the human rights situation along the supply and value chains in Germany and globally.

With the EnBW [Code of Conduct](#), the EnBW [Supplier Code of Conduct](#), the EnBW [Principles of Conduct for the Responsible Procurement of Raw Materials](#), and the EnBW [Declaration of Human Rights](#) 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:

- [Universal Declaration of Human Rights](#)
- [International Covenant on Civil and Political Rights](#)
- [International Covenant on Economic, Social and Cultural Rights](#)
- [Core labor standards of the International Labour Organization \(ILO\)](#)
- [UN Guiding Principles on Business and Human Rights](#)
- [OECD Guidelines for Multinational Enterprises](#)

IV Human Rights Due Diligence Obligations

Find out more about EnBW's **Declaration of Human Rights** here.

[Online ↗](#)

Further information on the **Code of Conduct** can be found here.

[Online ↗](#)

Find out more about EnBW's **Occupational Health & Safety Policy** here.

[Online ↗](#)

Further information on the EnBW **policy statement** can be found here

[Online ↗](#)

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 three 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 to human rights in the selection of suppliers and take appropriate preventative measures.

Our risk analysis is a central element of corporate due diligence, in which risks are identified and appropriate and effective mitigation measures are adopted in line with their defined priority. Therefore, we have further developed this risk analysis process through standardisation in 2024 and 2025, in order to identify and prioritise potential risks even more effectively. To further reinforce our commitments and standards in the area of human rights, in 2025 we updated our [Declaration of Human Rights](#) and our [Code of Conduct](#), and developed a [Occupational Health & Safety Policy](#).

To ensure that we can develop and implement targeted and effective measures, we have also established a Human Rights Steering Committee. In December 2025, we published our updated [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 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 \(RECOSI\)](#), [Bundesverband der Energie- und Wasserwirtschaft \(BDEW\)](#) and [Solar Power Europe](#) to help us maintain and refine our approaches and level of ambition in cooperation with other companies and relevant stakeholders.

1 EnBW's risk analysis process

The **first step** of our ongoing risk analysis involves a comprehensive description of the type and scope our business activities and the business relationships in our supply chain, as well as the associated corporate and procurement structures.

- The segments of our integrated value creation as an energy company and infrastructure provider (in the areas of generation, grids and sales) are decisive for our own area of business. This includes our subsidiaries and all companies over which we exert a decisive influence.
- We map the procurement structure according to our procurement categories and the associated countries of origin.

In the **second step**, we identify abstract risks, particularly industry- and country-specific risks associated with our own business activities and those of our suppliers.

Our analysis is based on

- internal and external sources such as reporting systems, studies and databases, and
- dialogue with the internal managers of LkSG-relevant areas in the Human Rights Steering Committee.

A process is in place for identifying abstract risks at the supplier level and in EnBW's own area of business. These risks are then prioritized based on an automated risk score using country and industry data. The results of the abstract risk assessment are communicated to all relevant internal stakeholders by the Steering Committee.

In the **third step**, we concretize our analysis, assigning weight and priority appropriately.

- The potential risks identified in the abstract risk analysis for the company's own area of business are then subjected to a concrete risk analysis in direct dialogue with the shareholdings and specialist departments.
- At the supplier level, the specific risk analysis is implemented automatically in the first phase using risk software that analyzes suppliers based on publicly available data. If risks are identified, we enter into direct dialog with the suppliers as a next step.

An event-driven risk analysis is triggered by the events described in the LkSG:

- Findings from the processing of information from the complaints procedure
- Actual indications that suggest that a violation of a human rights-related or of an environment-related obligation at direct or indirect suppliers may be possible (substantiated knowledge)
- Significant changes in EnBW's business activities that are expected to result in a change in the risk situation

2 EnBW's expectations towards suppliers

Find out more about the **rules of conduct on the procurement of raw materials** here.

[Online ↗](#)

Further information on the **Supplier Code of Conduct for business partners** can be found here.

[Online ↗](#)

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, photovoltaic products and battery technology. 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. As part 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 95 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.

3 Complaints mechanism

Find out more about EnBW's **grievance process** on our website.

[Online ↗](#)

Further information on the **Rules of Procedure** can be found here.

[Online ↗](#)

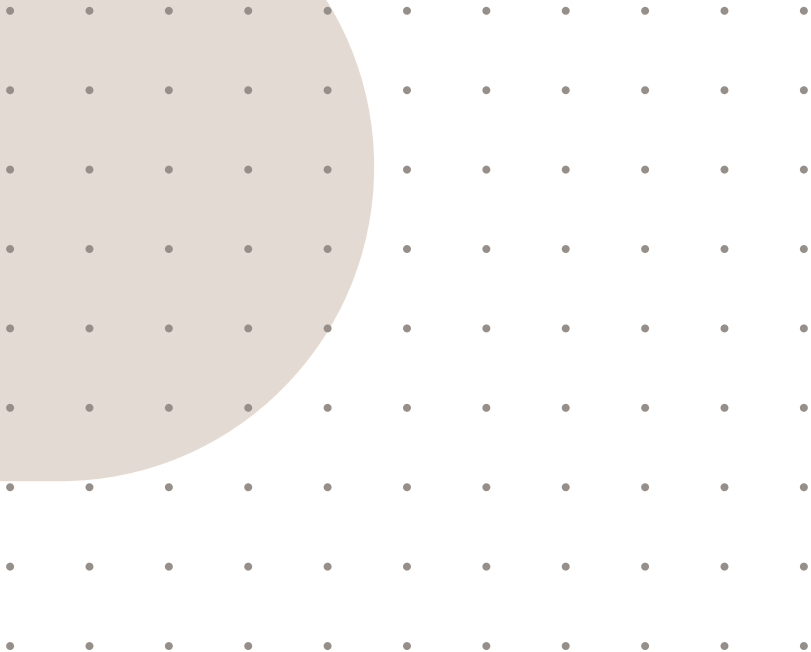
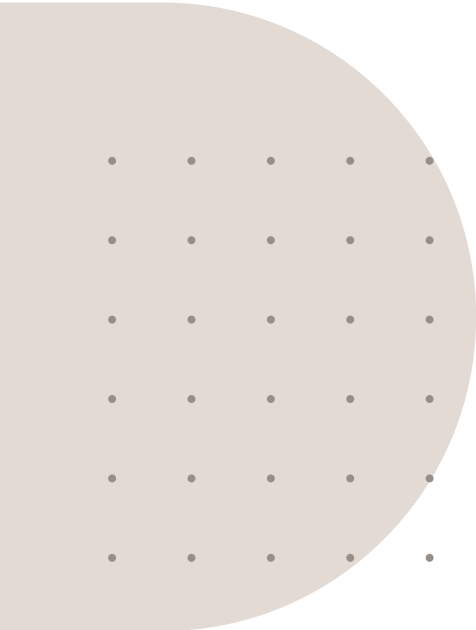
EnBW has set up a whistleblower system and grievance process in order to effectively prevent or counteract violations or negative impacts on people and the environment in its own area of business and in the supply chain at an early stage.

EnBW employees, business partners and their employees as well as affected parties can use the whistleblower system to report information on human rights or environmental risks or violations. The whistleblower system is also available to third parties who have information or knowledge about potential violations of human rights or environmental obligations or about risks arising from EnBW's business activities or in its supply chain.

EnBW's grievance process is structured to ensure that individuals can submit their complaints as barrier-free and easily accessible as possible. Various reporting channels have been set up for this purpose, which enable reports to be submitted in different languages at any time. In addition to the multilingual reporting channels of the Compliance department, the ombudsperson is available as a further point of contact. Whistleblowers are also free to report information anonymously. EnBW's internal complaints procedure regulations clearly define responsibilities and processes for investigating potential infringements. These regulations also guarantee confidentiality and offer the greatest possible protection for all parties involved. More detailed information on the [grievance process](#) can be found in the [Rules of Procedure](#).

V 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. We are continuously evolving our training materials. There are committees for sharing information and knowledge about compliance, human rights, equity, anti-discrimination, human resources, occupational health and safety and environmental issues.

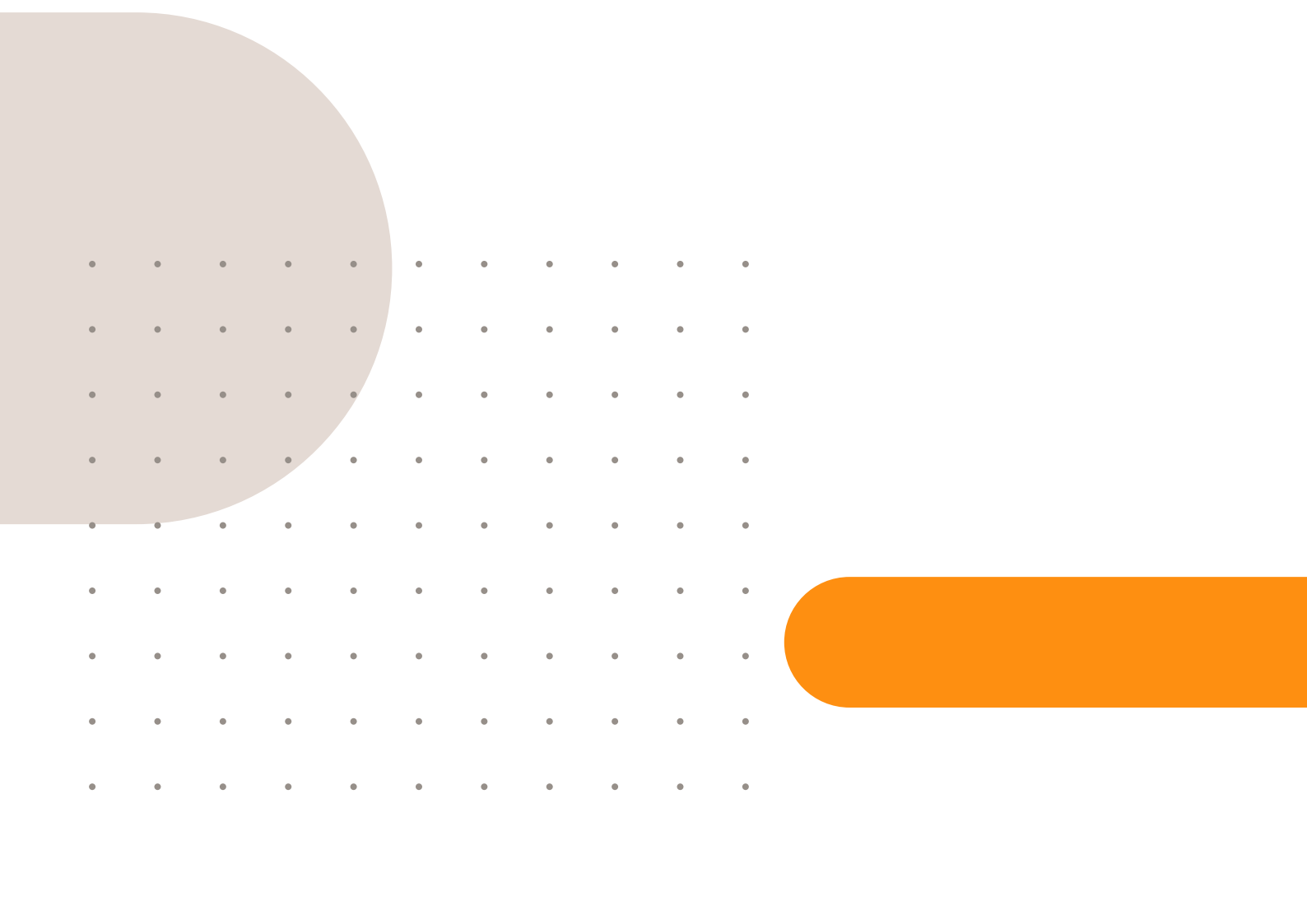


VI Management and evaluation

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. We conduct regular and event-driven reviews of the effectiveness and progress of our human rights due diligence obligations and the associated measures. These reviews allow us to make adjustments to structures, processes, and measures as needed. This process is accompanied by intensive stakeholder dialogue with various internal and external stakeholders - in particular within the framework of our internal Human Rights Steering Committee and externally in company, industry and multi-stakeholder initiatives as well as through participation in events such as panel discussions. Ongoing and focused dialogue regarding potential risks in our value chains allows us to continually learn, identify areas for improvement in our corporate due diligence, and develop further measures to respect human rights. This process encompasses all areas of our business, as well as our suppliers and business partners.

The control processes and complaints mechanism 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. We are, however, aware that our business activities pose a potential risk of child labour and forced labour among workers and local ethnic minorities in the sectors of raw material extraction and material processing (e.g. copper, bauxite, mica, neodymium, aluminium, polysilicon, iron ore, chromium) as well as in the construction industry, despite various preventive measures.

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.



VII About this report

This statement modern slavery and human trafficking is the second one of its kind published by EnBW AG. It relates to the reporting year ending 31 December 2025 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.

Contact persons

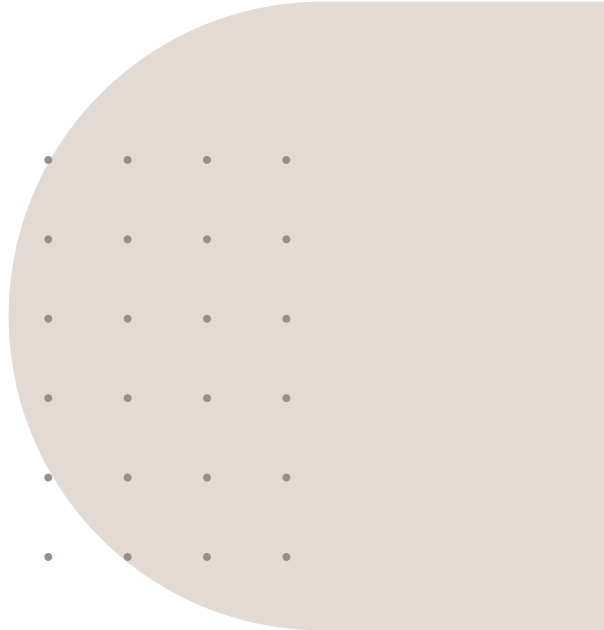
Dr. Lothar Rieth

Head of Sustainability
Phone: +49 721 63-24285
Durlacher Allee 93
76131 Karlsruhe

Dr. Andreas Schweinberger

Head of Compliance
Phone: +49 721 63-24920
Durlacher Allee 93
76131 Karlsruhe

E-mail: sorgfaltspflichten@enbw.com



EnBW Energie Baden-Württemberg AG

Contact

sorgfaltspflichten@enbw.com

+49 721 63-00

Durlacher Allee 93

76131 Karlsruhe, Germany

Companies registered office: Karlsruhe, Germany

Local court Mannheim · HRB no. 107956

Chairman of the Supervisory Board: Lutz Feldmann

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

Thomas Kusterer (Deputy Chairman), Dirk Güsewell,

Peter Heydecker, Colette Rückert-Hennen

Modern Slavery Act Statement V2.0
According to reporting year 2025

Published on 15 June 2026