

Slavery & Human Trafficking Statement

June 2020

E.ON's statement

This statement is made by E.ON SE as the ultimate holding company of the E.ON Group ("E.ON"), pursuant to section 54(6) of the UK's Modern Slavery Act 2015 (the "Act") for the financial year ending on 31 December 2019.

E.ON's structure, business & supply chain

E.ON is an international energy company which is focused on energy networks and customer solutions. Global trends like sustainability and climate protection, digitalization 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 of 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 introduced various policies and management processes.

E.ON's approach

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 Policy 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 secure 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 and strategic orders, upon fulfilment of contracts;
6. Whistleblowing hotline to enable employees and third parties to report possible violations of the law or of company guidelines or policies.

For further information about E.ON's responsible business practices please refer to

[E.ON's Sustainability Report](#).

E.ON's achievements in 2019

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

1. In 2019 E.ON updated its 2008 Human Rights Policy Statement, which is signed by all Management Board members and 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) and its fundamental conventions, and refers to E.ON policies, such as the E.ON Supplier Code of Conduct. E.ON's environmental, social and governance standards are based on the ten principles of the United Nations Global Compact (UN GC), the world's largest initiative for responsible corporate governance, which includes respecting human rights.
2. In 2019 E.ON focused on monitoring existing and new suppliers to ensure that they complied with E.ON's minimum requirements and that potential risks to health, safety, the environment and corporate social responsibility, including the protection of human rights, were identified and mitigated. This was facilitated by the adoption of a fully digital supplier onboarding solution at the end of 2018, which was integrated into E.ON's enterprise resource planning (ERP) system. This means that every non-fuel supplier, whose individual transaction volume exceeds €25,000 (per event and per spend category) or whose health, safety and environment risk is medium

The E.ON logo is displayed in a stylized, lowercase red font at the bottom right of the page.

Slavery & Human Trafficking Statement

June 2020

or high, must complete this onboarding process, which (among other requirements) requires the suppliers to pass a compliance check and accept E.ON's Supplier Code of Conduct. By the end of 2019, 98% of E.ON's purchase order and call-off contracts had completed the onboarding process.

3. Following a comprehensive assessment conducted in 2018, E.ON continued to evaluate its suppliers' performance and, based on the findings, make decisions about its future relationship with them. Key non-fuel suppliers are determined annually, based on E.ON's annual spend with them and their criticality to E.ON's business. They are then periodically evaluated using five key performance indicators (KPIs): quality, cost, delivery, innovation, and corporate social responsibility (which includes the protection of human rights). The total number of supplier performance reviews increased by 28% in 2019.
4. E.ON conducted a human rights risk assessment encompassing 80 per cent of its current and anticipated spend across all of its purchasing categories. The assessment yielded a risk matrix, which correlated the type of industry to the country of origin for each good or service procured. The risk matrix was used to further minimise E.ON's exposure to human rights risks along its supply chain and define measures to improve its human rights due diligence. In 2019, such measures included making the confidential whistle-blower hotline available to third parties.
5. E.ON continued to provide training to both its new and existing supply chain employees with the aim of enhancing knowledge of all sustainability issues, including social welfare and human rights topics.

Plans for 2020

Activities proposed for 2020 include:

- implementing an online training for all employees about human rights, based on the Human Rights Policy Statement;
- updating the Supplier Code of Conduct to reflect the updated Human Rights Policy Statement; and
- implementation of further assessments based on E.ON's human rights risk matrix, refined in 2019 to enable an even more structured approach to assessing human rights risks in E.ON's supply chain.

Health, safety and environment events will continue to be conducted throughout 2020 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 related 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 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 on June 16, 2020. A new statement will be published each year on the website.



Dr. Johannes Teyssen
Chief Executive Officer, E.ON SE
June 2020



Slavery & Human Trafficking Statement

June 2020

¹Which 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 UK CHP Limited
E.ON Control Solutions Limited
E.ON UK Steven's Croft Limited

The following companies were sold during the financial year ending 2019 and E.ON is not therefore producing a statement on their behalf (however, during the period of E.ON ownership, the policies and procedures of these companies were aligned with those covered in this statement):

E.ON Climate & Renewables UK Limited
E.ON Climate & Renewables UK Developments Limited
E.ON Climate & Renewables UK Robin Rigg East Limited
E.ON Climate & Renewables UK Humber Wind Limited
E.ON Climate & Renewables UK London Array Limited

To view E.ON's previous statements please [click here](#).

