

MAN Energy Solutions SE, 86224 Augsburg, Germany

Augsburg, May 2025

Ref.

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## MAN Energy Solutions Group Anti-slavery and Human Trafficking Statement for the Financial Year Ended 31st December 2024

Dear Sir or Madam,

**MAN Energy Solutions SE**  
Stadtbachstraße 1, 86153 Augsburg  
Germany

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Germany

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This statement is made pursuant to section 54 of the Modern Slavery Act 2015 of the United Kingdom of Great Britain and Northern Ireland. It sets out the steps that the MAN Energy Solutions Group has taken, and is continuing to take, to ensure that modern slavery and human trafficking are not taking place within its own business operations or supply chain. This statement covers all entities within the MAN Energy Solutions Group.

### Policies and Declarations

The MAN Energy Solutions Group adheres to the MAN Energy Solutions Group Code of Conduct ("Code of Conduct") and does not tolerate any form of modern slavery, child labor, forced, bonded or compulsory labor or servitude by or in relation to employees and suppliers. The Code of Conduct is made publicly available via the MAN Energy Solutions SE website <https://www.man-es.com/compliance>. The MAN Energy Solutions Group is committed to acting in an ethical manner, with integrity and transparency in all business dealings.

Further, MAN Energy Solutions follows the "Declaration by the Volkswagen Group on social rights, industrial relations and business and human rights" (hereinafter "Social Charter") and Policy statement of MAN Energy Solutions SE for compliance with human rights and environmental due diligence obligations pursuant to section 6(2) of the German Act on Corporate Due Diligence Obligations for the Prevention of Human Rights Violations in Supply Chains (Lieferkettensorgfaltspflichtengesetz - LkSG) of 16 July 2021 (hereinafter "Policy Statement"), which are available on the MAN Energy Solutions SE website under <https://www.man-es.com/compliance>. The Social Charter and the Policy Statement of MAN Energy Solutions provide a comprehensive outline of the human rights commitments the company adheres to, which includes but not limited to the eradication of forced and child labor. Additionally, these documents are endorsed by a declaration of implementation, duly signed by the executive board members of the MAN Energy Solutions Group, affirming their dedication to these principles.

Vorsitzender des Aufsichtsrates:  
Gunnar Kilian  
Vorstand: Dr. Uwe Lauber (Vorsitzender),  
Jürgen Klöpffer, Martin Oetjen,  
Ingrid Rieken, Dr. Gunnar Stiesch

Sitz der Gesellschaft: Augsburg  
Registergericht: Amtsgericht Augsburg,  
HRB 22056

Ust.Id.-Nr.: DE 811 136 900

Deutsche Bank Augsburg  
DE93 7207 0001 0015 9244 00  
SWIFT: DEUTDEMM720  
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SWIFT: COBADEFF720  
Deutsche Bank Oberhausen  
DE46 3657 0049 0415 8721 00  
SWIFT: DEUTDEDE365  
Commerzbank Oberhausen  
DE81 3654 0046 0380 0877 00  
SWIFT: COBADEFF365

**Suppliers and Business Partners**

The MAN Energy Solutions Group has enacted a Code of Conduct for Suppliers and Business Partners, which is communicated to all suppliers and business partners and which prohibits abuses of human rights, including but not limited to any form of modern slavery, human trafficking, unethical recruitment, unequal treatment, child, forced, bonded or compulsory labor or servitude. The MAN Energy Solutions Group expects its suppliers and business partners and their employees to act responsibly and comply with the requirements of the Code of Conduct for Suppliers and Business Partners. The business partners are also required to contractually pass on the requirements to those business partners that affect the contractual relationship with MAN Energy Solutions and to ensure, to the extent possible and reasonable, that the sustainability requirements are passed on to their business partners in the supply chain.

All procurement is based on objective and fair criteria, transparency and procedural fairness. In addition to carrying out due diligence on prospective suppliers, as part of the tender process, suppliers are expected to confirm their agreement with the MAN Energy Solutions Group's contractual terms and conditions, confirm that they will comply with the Supplier and Business Partner Code of Conduct, and provide the services in accordance with all applicable laws and regulations.

The MAN Energy Solutions Group considers compliance with the Code of Conduct for Suppliers and Business Partners to be essential to its contractual relationships with suppliers and business partners. The MAN Energy Solutions Group has the right to audit suppliers and business partners for compliance with applicable laws. The MAN Energy Solutions Group also has the contractual right to verify compliance with the Code of Conduct for Suppliers and Business Partners. In cases where the supplier or business partner does not comply with the Code of Conduct for Suppliers and Business Partners or is unable to prove to the MAN Energy Solutions Group's satisfaction that it has implemented countermeasures to prevent future non-compliance, MAN Energy Solutions Group may request implementation of preventive or remedial measures, exclude the supplier or business partner from new orders or end its relationship with a supplier or business partner .

**Training**

All employees of the MAN Energy Solutions Group participate in a mandatory Code of Conduct training, which covers the MAN Energy Solution Group's commitment to human rights. Further, all employees of the MAN Energy Solutions Group participate in the mandatory training called "Human Rights - Our responsibility at MAN Energy Solutions, a part of the Volkswagen Group".

## Whistleblower System

The MAN Energy Solutions Group is part of the Volkswagen Group and therefore uses the central whistleblower system available at <https://www.man-es.com/compliance/whistleblower-system>.

The whistleblower system provides an independent complaints procedure and enables internal and external whistleblowers to report potential violations of statutory laws and regulations as well as of company policies and guidelines (e.g. the MAN Energy Solutions Group Code of Conduct) by MAN Energy Solutions, its employees and suppliers through a variety of channels, including confidential or anonymous communication channels, if desired by the whistleblower. The MAN Energy Solutions Group protects all whistleblowers who act in good faith against discrimination and retaliation.

MAN Energy Solutions SE

Dr. Uwe Lauber  
Chief Executive Officer  
Chief Sales Officer

Jürgen Klöpffer  
Chief Financial Officer

Martin Oetjen  
Chief Operating Officer

Ingrid Rieken  
Chief Human Resources Officer

Dr. Gunnar Stiesch  
Chief Technical Officer