

MAN Energy Solutions SE, 86224 Augsburg, Germany

To whom it may concern

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MAN Energy Solutions Group Anti-slavery and Human Trafficking Statement for the Financial Year Ended 31st December 2020

This statement is made pursuant to s.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 business or supply chain. This statement covers all entities within the MAN Energy Solutions Group¹.

Policies

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.

Suppliers and Business Partners

The MAN Energy Solutions Group has enacted a Code of Conduct for Suppliers and Business Partners, which is made publicly available via the MAN Energy Solutions SE website <https://www.man-es.com/compliance> and communicated to suppliers and business partners, and which prohibits abuses of human rights, including any form of modern slavery, child, forced, bonded or compulsory labour 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.

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 Code of Conduct for Supplier and Business Partners, 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

contractual right to end its relationship with a supplier or business partner or to take alternative action if 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 noncompliance. The MAN Energy Solutions Group also has the right to audit suppliers for compliance with applicable laws.

In 2020, the MAN Energy Solutions Group took measures to ensure compliance with the European Union Conflict Minerals Regulation, with the aim of improving transparency within the supply chain up to and including the extraction of raw materials. A section setting forth the MAN Energy Solution Group's expectations of suppliers and business partners regarding the duty of care to have a responsible supply chain for raw materials was added to the Code of Conduct for Suppliers and Business Partners, and has come into effect in 2021. Other internal measures taken were the development of a risk-based approach to supplier due diligence and the launch of a cross-functional committee for addressing sustainability-related concerns, including any potential concerns regarding so-called conflict minerals in the supply chain.

Training

All employees of MAN Energy Solutions Group participate in mandatory Code of Conduct training, which covers the MAN Energy Solution Group's commitment to human rights.

Whistleblower System

The MAN Energy Solutions Group offers a secure whistleblower system for providing information on potential compliance violations. The whistleblower system enables internal and external whistleblowers to report potential violations through a variety of channels, including confidential or anonymous communication channels, if desired by the whistleblower. Whistleblowers may report potential violations of statutory laws and regulations as well as of company policies and guidelines (such as the MAN Energy Solutions Group Code of Conduct). Allegations of human rights violations, including modern slavery, are covered by the MAN Energy Solutions Group Code of Conduct and can be reported into the whistleblower system.

All whistleblowers who act in good faith are protected against discrimination and retaliation.

The MAN Energy Solutions Group is part of the Volkswagen Group of companies, and therefore the Whistleblower system can be accessed at this location <https://www.volkswagenag.com/en/group/compliance-and-risk-management/whistleblowersystem.html#>.

MAN Energy Solutions SE



Dr. Uwe Lauber
Chief Executive Officer



Wayne Jones OBE
Member of Executive Board – Global Sales & After Sales