

UK Modern Slavery Act

Annual Statement



Bilfinger Nuclear & Energy Transition GmbH is committed to and meets the objectives of the UK Modern Slavery Act.

Bilfinger Nuclear & Energy Transition GmbH is part of the Bilfinger Group of companies, head quartered in Mannheim, Germany.

Bilfinger Nuclear & Energy Transition GmbH operates under an extensive set of governance documents, e.g., Group Principles, a Code of Conduct, a Statement of Principles on Human Rights as well as additional group policies and standard operating procedures, which together set out general standards of behaviour that everyone within the company must comply with. The company is committed to acting ethically and with integrity in all business dealings and relationships. Risk management systems established over many years and the Group-wide operationalized Bilfinger Compliance Management System (CMS) ensure this commitment is met and monitor the implementation of Group guidelines.

We expect the highest standards of ethical business practices from all of our employees and look for the same high standards from our contractors and supply chain.

As part of our commitment to the principles contained in the Bilfinger Code of Conduct, we expect our business partners to follow comparable standards in their conduct as outlined in the Code of Conduct for Suppliers. Our Codes are underpinned by our Group Policies on Anti-Corruption, Competition and Third Party Due Diligence and our Statement of Principles on Human Rights, all of which ensure that we adhere to fair employment, ethical behaviour and forbids illegal employment.

Within our business and supply chain we operate a robust Third Party Due Diligence Policy. Our Third Party Due Diligence Policy seeks to ensure Third Parties with whom we work act in accordance with our principles and values, including a commitment to zero tolerance anywhere in our business and supply chain for slavery and human trafficking. Our expectations are set out in our vendor declaration, which our business partners are contractually obliged to follow. Our supply chain is audited to ensure compliance with our standards.

This means we operate with transparency, responsibility, security and integrity in dealing with business partners and colleagues.

The Executive Board of Bilfinger SE established a risk management system for compliance with human rights due diligence obligations in 2022, which is fully integrated into the CMS, and appointed a Group Human Rights Officer, who is responsible for monitoring the related risk management. It is anchored throughout the Group in all relevant business processes through appropriate measures.

In Bilfinger's Statement of Principles on Human Rights, the company commits to the principles of human rights of the United Nations. In addition, the requirements of the UN Global Compact apply, which Bilfinger has committed to comply with as a member. It also formulates clear human rights and environmental expectations for Bilfinger employees and suppliers in the Group's supply chain. This policy statement describes the procedures Bilfinger uses to fulfil its due diligence obligations under the German Supply Chain Due Diligence Act, including regular risk analyses in its own business area and at suppliers, established prevention and remedial measures, and process elements of the Group-wide whistleblower system.

The global Bilfinger confidential reporting line, which is accessible to both employees and third parties, enables human rights and environmental risks as well as violations of human rights or environmental obligations arising from Bilfinger's economic activities in its own business area or that of a supplier to be reported. Procedural rules for the whistleblower system, which are publicly available on the Bilfinger website, provide whistleblowers with information on the scope of application of the procedure. They explain how the complaint procedure works and



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also identify the contact persons for whistleblowers and how Bilfinger ensures effective protection against discrimination or punishment as a result of a complaint.

With regard to the extensive preventive measures developed over recent years, the focus is particularly on the further development of appropriate procurement strategies and purchasing practices to prevent or minimize identified risks, the implementation of training courses in the relevant business areas, and the execution of risk-based control measures to verify compliance with the human rights strategy contained in the policy statement in our own business area.

Bilfinger Group companies will not be in business contact with customers and suppliers that are listed on sanction lists.

Our directors lead by example on the development, training, monitoring and compliance of our policies and our commitment to ensuring we have a business and supply chain that is free from slavery and human trafficking. Our workforce is trained in all aspects of our Compliance Management System, our Statement of Principles on Human Rights, and Code of Conduct. Training is provided at all levels in the company. We have enacted compliance regulations that apply throughout the Group. The 'Compliance' e-learning training program conveys these values in an interactive, online format.

The Group continues to build on the approach deployed to ensure that it operates free from enforced labour, human trafficking and slavery.

Andreas Hilpert

Managing Director

Nuclear & Energy Transition GmbH