



MODERN SLAVERY STATEMENT FOR THE FINANCIAL YEAR ENDING 30 SEPTEMBER 2021 ISSUED PURSUANT TO SECTION 54(1) OF THE UK'S MODERN SLAVERY ACT 2015

This statement is made in accordance with Section 54(1) of the UK's Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for the financial year commencing 1 October 2020 and ending 30 September 2021 for Axpo Solutions AG and for its subsidiaries operating in the UK, namely:

- Axpo UK Limited; and
- Axpo UK Trading Limited (and together with Axpo UK Limited **Axpo UK**).

OUR CORE PRINCIPLES

Axpo Solutions AG (**Axpo**) is a global leading brand producing, supplying and trading energy with a large presence in the renewable energy sector. Axpo is the parent company of the Axpo's international business including the Axpo UK business (the **Group**).

The Group employs over 5000 people worldwide and is active in over 30 countries. To find out more about the nature of our business, please visit <https://www.axpo.com>.

Axpo's UK product offering includes bankable long-term PPA and GPA contracts to independent electricity and gas producers, bespoke energy supply contracts and a range of market access and risk management instruments to independent retailers and wholesale market participants.

Axpo is committed to complying with its obligations arising as a matter of law in regards to preventing acts of modern slavery and human trafficking from occurring within both its business and supply chain, and imposes those same high standards on its suppliers.

POLICIES

The Group is committed to reliability, sustainability and innovation. It recognises that its employees and executives are all responsible for embodying these values by acting with integrity, responsibility, transparency, and respectful behaviour towards each other. Axpo's commitment to the law and ethics is non-negotiable and the responsibility of every employee. Axpo's management leads by example.

Internal policies ensure that Axpo conducts its business in accordance with these principles.

The Code of Conduct and Business Principles contain fundamental principles that must be observed by all Group employees and business partners. Our principles include conducting business with integrity, safety and protection of people and the environment, protection of personal rights, fostering diversity and equal employment opportunities, respecting principles of fair competition, anti-corruption and adherence with all applicable laws. We work with business partner that share our values and recognise these principles.



We have additional measures in place across our business, including:

We review all potential business partners before we enter into any business relationships with them. As part of our counterparty risk assessment, we undertake a risk based due diligence process to check international databases and information systems as well as conducting more general searches to see whether any misconduct is known.

In the event that we charter a vessel to transport cargo, we seek to contract on terms which oblige the owners of the vessel to ensure that the vessel is manned and controlled in accordance with the recommendations of the International Transport Workers Federation and that all officers and crew are employed on terms and conditions which are no less favourable than those prescribed by the Maritime Labour Convention.

We also make sure that our suppliers are aware of our policies and expect them to adhere to the same high standards.

RISK AND COMPLIANCE

Axpo regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain.

We do not consider that our UK business operates in high risk sectors or locations because our activities focus on the UK market on behalf of UK suppliers and large retail clients meaning that our business partners are likely to match Axpo's levels of transparency in relation to UK employment law and the Modern Slavery Act.

Should we identify any potential risks, we will conduct enhanced due diligence evaluations in considering whether to proceed with such business.

TRAINING


All of our employees are required to complete regular compliance training, which takes into account regulatory developments. The training ensures that employees are aware that they are able to raise concerns including about how colleagues are being treated, practices within our business and supply chains, without fear of reprisals.

Should Axpo observe any increased modern slavery risks in the course of its business in the future then it will implement additional trainings as necessary to address such risks.




This statement constitutes the slavery and human trafficking statement for Axpo Solutions AG for the financial year ending 30 September 2021.

Axpo Solutions AG

DocuSigned by:

7A0C90A91ECB416...

Joris Gröflin

President of the Board of Directors

DocuSigned by:

8CAE1C7FDB2F452...

Domenico De Luca

Member of Board of Directors

Certificate Of Completion

Envelope Id: C1270E7ED73040C5870797FB3FAD21C0	Status: Completed
Subject: Please DocuSign: Axpo Solutions Modern Slavery Statement - Financial Year Ending 2021 (25.11.21...	
Source Envelope:	
Document Pages: 3	Signatures: 2
Certificate Pages: 2	Initials: 0
AutoNav: Enabled	Envelope Originator:
Envelopeld Stamping: Enabled	Semra Cecchetto
Time Zone: (UTC+01:00) Amsterdam, Berlin, Bern, Rome, Stockholm, Vienna	Parkstrasse 23
	Baden, AARGAU CH-5401
	semra.cecchetto@axpo.com
	IP Address: 159.168.126.252

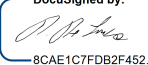
Record Tracking

Status: Original 12/9/2021 9:52:13 AM	Holder: Semra Cecchetto semra.cecchetto@axpo.com	Location: DocuSign
--	---	--------------------

Signer Events

Domenico De Luca
domenico.deluca@axpo.com
CEO Axpo Solutions AG
Axpo Solutions AG
Security Level: Email, Account Authentication (None)

Signature

DocuSigned by:

8CAE1C7FDB2F452...

Signature Adoption: Uploaded Signature Image
Using IP Address: 159.168.126.252

Timestamp

Sent: 12/9/2021 9:58:45 AM
Viewed: 12/10/2021 9:07:57 PM
Signed: 12/13/2021 10:55:04 AM

Electronic Record and Signature Disclosure:
Not Offered via DocuSign

Joris Gröflin
joris.groeflin@axpo.com
CFO Axpo Konzern
Axpo Services AG
Security Level: Email, Account Authentication (None)

DocuSigned by:

7A0C90A91ECB416...

Signature Adoption: Drawn on Device
Using IP Address: 172.225.26.25

Sent: 12/13/2021 10:55:06 AM
Viewed: 12/13/2021 11:03:16 AM
Signed: 12/13/2021 11:03:47 AM

Electronic Record and Signature Disclosure:
Not Offered via DocuSign

In Person Signer Events	Signature	Timestamp
Editor Delivery Events	Status	Timestamp
Agent Delivery Events	Status	Timestamp
Intermediary Delivery Events	Status	Timestamp
Certified Delivery Events	Status	Timestamp
Carbon Copy Events	Status	Timestamp

Jeremy Leigh
Jeremy.Leigh@axpo.com
Director of Legal & Compliance
Axpo New System
Security Level: Email, Account Authentication (None)

COPIED

Sent: 12/13/2021 11:03:49 AM
Viewed: 12/13/2021 6:33:27 PM

Electronic Record and Signature Disclosure:
Not Offered via DocuSign

Carbon Copy Events	Status	Timestamp
Pia Zehnder Pia.Zehnder@axpo.com Assistant Legal, Compliance & Regulatory Axpo Security Level: Email, Account Authentication (None) Electronic Record and Signature Disclosure: Not Offered via DocuSign	COPIED	Sent: 12/13/2021 11:03:49 AM Viewed: 12/13/2021 11:04:26 AM
Dragica Baer dragica.baer@axpo.com Assistant to CFO Axpo Services AG Security Level: Email, Account Authentication (None) Electronic Record and Signature Disclosure: Not Offered via DocuSign	COPIED	Sent: 12/13/2021 11:03:50 AM
Serena Notter Serena.Notter@axpo.com Axpo Solutions AG Security Level: Email, Account Authentication (None) Electronic Record and Signature Disclosure: Not Offered via DocuSign	COPIED	Sent: 12/13/2021 11:03:50 AM Viewed: 12/13/2021 2:08:57 PM

Witness Events	Signature	Timestamp
----------------	-----------	-----------

Notary Events	Signature	Timestamp
---------------	-----------	-----------

Envelope Summary Events	Status	Timestamps
-------------------------	--------	------------

Envelope Sent	Hashed/Encrypted	12/9/2021 9:58:45 AM
Certified Delivered	Security Checked	12/13/2021 11:03:16 AM
Signing Complete	Security Checked	12/13/2021 11:03:47 AM
Completed	Security Checked	12/13/2021 11:03:50 AM

Payment Events	Status	Timestamps
----------------	--------	------------