

Modern Slavery and Human Trafficking Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for Fluence Energy UK Ltd incorporated in the UK for the financial year ended 30th September 2024. It was approved by the board on 4th September 2025.

Introduction

Fluence Energy UK Ltd ("Fluence UK"), a subsidiary of Fluence Energy LLC, is committed to conducting business responsibly and with integrity. We recognise our responsibility to prevent modern slavery and human trafficking in our operations and supply chains, and we fully support the aims of the UK Modern Slavery Act 2015. This statement sets out the steps we have taken and will continue to take to ensure that modern slavery does not occur within our business or our supply chain.

Our Business and Supply Chains

Fluence is a global leader in battery-based energy storage technology, services, and digital applications. Fluence UK provides energy storage solutions, project delivery, and operational services to customers in the United Kingdom and across EMEA. Our supply chains include the sourcing of battery energy storage systems, electrical equipment, construction services, professional services, IT, and other business support services.

Our Policies

We are guided by a global commitment to responsible business practices, supported by the key policies and procedures.

The **Fluence Code of Conduct & Ethics** serves as the central pillar of our Ethics & Compliance Programme. It outlines the values, principles, and behavioural expectations for all Fluence team members, including employees, contractors, suppliers, and external agents, across global operations. Key relevant features include:

- **Commitment to Human Rights:** The Code explicitly requires respect for basic human rights and compliance with laws prohibiting modern slavery, including child and forced labour.
- **Responsible Supply Chain:** Suppliers must sign a dedicated Code of Conduct for Third-Party Intermediaries, which mandates, i) compliance with anti-slavery laws, ii) respect for human rights, and iii) promotion of compliance throughout their own supply chains.

Fluence's **Supplier Code of Conduct** ("SCC") outlines the ethical, legal, and social expectations for all business partners and third-party intermediaries. It is grounded in

internationally recognised frameworks including the UN Guiding Principles on Business and Human Rights, the ILO Tripartite Declaration, and the OECD Guidelines for Multinational Enterprises. Key Provisions of the SCC Relevant to Modern Slavery:

- **Freely Chosen Employment:** All labour must be voluntary. The Code strictly prohibits forced, bonded, indentured, or prison labour, as well as human trafficking.
- **Migrant Worker Protections:** Contracts must be clear, fair, and in a language understood by the worker. Recruitment must be ethical and transparent.
- **Child Labour Prohibition:** Suppliers must comply with ILO Convention No. 138 and applicable national laws.
- **Grievance Mechanisms:** Suppliers are required to implement anonymous and effective grievance channels for workers and stakeholders.
- **Supply Chain Accountability:** Suppliers must cascade these standards to their own suppliers and conduct due diligence to identify and mitigate risks.

All contractors and suppliers of goods and services to Fluence UK must be on our Approved Contractor / Supplier Lists, which requires the completion of a Modern Slavery and Human Trafficking Declaration. Contractors and suppliers must demonstrate compliance with the Modern Slavery Act and our SCC to be included on these approved lists.

Our Whistleblowing Policy provides employees and third parties with a channel to raise concerns confidentially using the Ethics Point Hotline, which includes any concerns in respect to Modern Slavery.

We operate a robust **recruitment process** for employees, which includes conducting checks on candidate's eligibility to work in the UK, to safeguard against human trafficking or individuals being forced to work against their will.

Due Diligence and Risk Management

We take a risk-based approach to managing modern slavery in our supply chains:

- **Due diligence:** Conducting supplier due diligence, including ethical and compliance screening.
- **Contractual provisions:** Including contractual provisions to address compliance with modern slavery laws.
- **Declaration:** Suppliers must sign a declaration of compliance and may be subject to audits by Fluence or its customers.
- **Material breaches:** such as incidents of forced labour or child labour can result in immediate termination of contracts.
- **Audits:** Fluence reserves the right to inspect supplier premises and requires cooperation in such inspections.
- **High risk awareness:** Prioritising suppliers in higher-risk geographies or sectors for closer monitoring.

Supply Chain Sustainability and Accountability

Fluence Energy UK Ltd embeds human rights protections within a broader Responsible Sourcing (RS) strategy designed to uphold environmental, social and governance (ESG) standards across our global supply chain. This program drives accountability among our suppliers and is essential to protecting both people and the environment from potential risks. Our approach includes supplier engagement, education, self-assessment questionnaires (SAQs), independent audits, and scorecards to measure and track supplier performance against Fluence's expectations.

Transparency is a cornerstone of our approach. We continually monitor suppliers through structured assessments and reporting mechanisms, adapting oversight in response to globalisation, climate-related challenges, and evolving regulatory requirements. For example, in FY24:

- 16 factories and 13 suppliers were formally assessed under our RS programme.
- 69% of suppliers completed SAQs.
- 3 independent audits conducted.
- Supplier scorecards were issued across multiple performance tiers (Gold, Silver, Platinum)

These measures strengthen integrity in our supply chain and support sustainable long-term growth while upholding social responsibility.

Through cross-functional collaboration, our supply chain and procurement teams implement risk management and sustainability programs that align all stakeholders with Fluence's human rights commitments. This integrated approach ensures that our suppliers are not only compliant with legal obligations, but also advancing industry best practice in safeguarding workers' rights and preventing modern slavery.

Training and Awareness

We are currently focusing on raising internal awareness to enable the relevant members of our organisation, and specifically procurement, risk, corporate responsibility and human resources teams to understand the requirements of the Modern Slavery Act and to give them the tools to identify potential issues.

Activity over the Financial Year

Fluence Energy UK Ltd is dedicated to the principle of continuous improvement in its efforts to combat modern slavery and human trafficking. As part of our annual review process, we assess the effectiveness of our policies and risk management procedures by incorporating insights from supplier audits, grievance mechanisms, internal feedback,

and external developments. Audit findings inform targeted action plans and training, ensuring meaningful adaptation and remediation where necessary.

We apply rigorous due diligence measures, including the vetting of all contractors engaged in on-site construction and maintenance services, as well as other key suppliers, to ensure compliance with the UK Modern Slavery Act. We also regularly evaluate our supply chain risk landscape, prioritising enhanced monitoring in response to emerging risks or regulatory updates from the UK government and other authorities.

During the financial year ending 2024, no instances of modern slavery or human trafficking were identified within Fluence Energy UK Ltd or, to the best of our knowledge, within our supply chain. Our commitment remains to transparently disclose progress, adapt to new legislative requirements, and engage with stakeholders to ensure our practices are robust and effective in eradicating modern slavery across our business and supply chains.

Publication

This statement will be made available on our website fluenceenergy.com/sustainability.

Approval

It has been approved by the Board of Directors of Fluence Energy UK Ltd and is signed for and on behalf of Fluence Energy UK Ltd by:

Brian Perusse
Director

Julian Jansen
Director