



# Modern Slavery Statement

For the Financial Year ending on 31 December 2023

## 01 — Business Organisation and Structure

This statement is made by and on behalf of EVBox B.V. (hereinafter referred to as “**EVBox**”). EVBox is active in the designing, manufacturing, assembling and supplying of charging solutions for electric vehicles and carries on part of its business in the UK. Since 2017, EVBox has been part of the ENGIE group of companies (“**ENGIE**”, or “**Group**”). EVBox is headquartered in Amsterdam, Netherlands and has establishments in the EU, UK, and the United States.

Our supply chain involves suppliers providing goods and services in relation to the products and services we offer (direct procurement), to our office needs and to running our business (indirect procurement).

## 02 — Policies

We are committed to the highest standards of ethical and legal business conduct, and we expect our suppliers to share the same commitment. As part of ENGIE, we adopt ENGIE’s ethics and compliance policies, principles, and commitments, by implementing them at EVBox and adapting them to our business and culture. The Group’s commitment to the respect for human rights, including explicitly the rejection of forced labor, is laid down in a number of key documents, including the following (publicly available via the embedded links):

- [Ethics Code of Conduct](#),
- [Code of Conduct in Supplier Relations](#), and
- [Human Rights Referential: commitments and implementation](#).

**Ethics Code of Conduct** defines the fundamental principles underlying our overall ethical commitments and policies. It provides guidance to help our employees make the right decisions in a range of business practices. “Respect for human rights” is one of the fundamental principles, under which the Group’s commitments include: a respectful and inclusive work environment; combatting violence, moral or sexual harassment, and sexist behavior; refusal of forced labor and child labor; respect for freedom of association; and respect for the rights of local communities. Taking human rights into account in the exercise of its activities is a fundamental requirement for the Group.

The **Human Rights Referential** is a dedicated human rights policy which establishes the Group’s commitments in line with the recommendations of the United Nations Guiding Principles on Business and Human Rights. The commitments include, among others, carrying out business activities while respecting internationally recognized human rights; making sure that the fundamental rights of the employees are respected; rejecting all forms of harassment and violence in the workplace; and including in the contracts with suppliers and partners a provision requiring them to respect the Group’s human rights commitments.

The **Code of Conduct in Supplier Relations** sets out seven principles we expect our employees to follow in the relationships with suppliers. This includes a commitment to the International Labor Organization (ILO) conventions on labor rights (e.g., prohibiting child and forced labor, ensuring the safety and wellbeing of workers). We are committed to providing fair working conditions and we expect our suppliers to treat their employees fairly and with dignity.

The **Code of Conduct for EVBox Supply Chain**, adopted in 2023, further strengthens commitments to compliance in our supply chain. Among other things, our suppliers are required to uphold the principles of equal opportunity and fair employment practices in all aspects of their operations, avoid any form of discrimination, not to engage in nor tolerate the use of forced labor, child labor and any form of human trafficking, and provide a safe and healthy working environment across all locations where work is undertaken.

EVBox **Diversity, Equity and Inclusion Policy** reinforces the importance of creating an equitable, diverse and inclusive working environment. It contains EVBox commitments to a workplace free from discrimination, harassment, bullying and victimization, treating everyone fairly and with respect, and creating equal employment opportunities, among others.

Finally, we have implemented the **Ethics Reporting Policy**, applicable to all employees across all countries where EVBox has establishments. The Ethics Reporting Policy aims to strengthen the speak-up culture at EVBox and provides employees with information and tools to raise concerns. In addition, as required by law, we have dedicated

**Whistleblowing Policies** in the Netherlands and France, implementing the EU Whistleblowing Directive (adopted in 2021) and applicable to workers in those jurisdictions respectively.

**Reporting channels.** As part of the EVBox's determination to deepen our commitment to ethics and to provide easy-to-use tools for anyone to report inappropriate situations or those that are not in line with our principles, policies, or current laws and regulations, we have put in place internal reporting channels. In 2021, we implemented a third-party hotline (EthicsPoint), which is accessible by both employees and third parties and allows to report anonymously. Since 2022, the hotline is available in French, Dutch and German languages (in addition to English), making it more accessible for the reporters in different geographical locations.

In 2023, EVBox undertook significant steps towards sustainability, building upon the insights gained from the 2022 Double Materiality Assessment. [The 2023 Impact Report](#) highlights our ESG performance, activities and impact including the information on the whistleblowing system (see *Reporting and Whistleblowing* on page 50) and related KPIs (see Annex 1 on page 69). As of 2023 each year, we will report on material indicators from across our business. By doing so, we provide an additional layer of transparency into our work and allow readers to follow our progress. For more details, please visit: <https://evbox.com/en/sustainability>

## 03 — Due Diligence and Risk Assessment

We have dedicated resources within our organization to identify risks and put in place processes and appropriate measures to assess, manage and minimize the risks of modern slavery within our supply chains. These include the CSR (corporate social responsibility) team, Legal and compliance team, Risk management & Internal controls and the departments directly involved in the relationships with suppliers (procurement, product compliance, quality). In 2022, we set up a Governance, Risk and Compliance (GRC) Committee. As part of the GRC Committee activities, we adopted EVBox Risk Management Policy and created the Risk Register, which contains key risks across the organization, including the compliance risks.

**Risk assessment.** With regard to our business organization, the EVBox establishments (EU, UK, US) and our Tier 1 supply chain (as described below), we generally consider the country risk low, due to a more limited exposure to the countries where protection against breaches of human rights is limited. Taking into account the type of EVBox business, we also consider the sector risk low. However, we recognize there might be suppliers involving potentially higher risks both in Tier 1 and further down the supply chain. In view of that and taking into consideration the size of our business and available resources, we are gradually enhancing our third-party risk management processes, as described below.

**Our workforce.** As an employer of highly skilled and predominantly highly qualified talent, the risk of modern slavery within our business is considered low. We exclusively employ in the countries where we have establishments (EU, UK, and US) and do not use any workforce in other locations. Our HR and employment policies and practices are aimed at ensuring fair recruitment, equal opportunities, and a secure working environment for all employees. All candidates undergo the same selection process and are employed under the same terms.

**Our supply chain.** Our Tier 1 suppliers in direct procurement are located primarily in the EU and the USA with a limited number in China.

**Due Diligence.** New Tier 1 suppliers undergo a supplier selection assessment, which, among other things, includes an assessment of the working conditions and a question regarding human rights and anti-modern slavery actions. We recognize there are suppliers involving potentially higher risk and apply additional measures. For example, for the products in scope of the Uyghur Forced Labor Prevention Act, we conduct (via a third party) a due diligence of suppliers based in China to ensure their compliance with the Act, and plan to extend this practice to a wider group of suppliers, applying a risk-based approach.

**Contractual mechanisms.** When establishing relationships with new suppliers, we ensure that each contract includes a commitment to uphold the principles covered by our policies. The Code of Conduct for EVBox Supply Chain is an essential component of our standard supply contracts. It mandates that our suppliers guarantee their compliance (and

ensure compliance further down the supply chain) with all relevant laws, including those related to human rights, child labor, and forced or compulsory labor.

Our standard contract templates also grant EVBox the right to conduct audits in order to verify suppliers' compliance with our policies. If an audit reveals that a supplier has violated the Code of Conduct for EVBox Supply Chain, the supplier must promptly take corrective actions and we reserve the right to conduct a subsequent audit. When the second audit shows that the supplier has not implemented any corrective measures, we have the option to terminate the contract.

By offering suppliers the opportunity to rectify non-compliance issues, rather than resorting to a strict punishment in the form of contract termination, we encourage them to improve their operations. This approach effectively contributes to the advancement of working conditions across the industry. At the moment, we do not have resources to specifically audit suppliers other than Tier 1 suppliers.

For the coming period, we are working towards several goals as a company which we believe will strengthen our compliance in the modern slavery space. Among other things (and in view of the new Corporate Sustainability Reporting Directive and Corporate Sustainability Due Diligence Directive), we have developed a plan to further improve our policies, practices and processes (including risk assessment and due diligence) aimed to enhance the protection of the environment and human rights.

## 04 — Training

All our new employees are required to complete a compulsory training as part of the onboarding process, which covers topics related to ethical, social and environmental matters. We also annually conduct face-to-face ethics and compliance training sessions in our regional offices covering such topics as ethical principles, reporting and whistleblowing, ethics in business relationships with customers, suppliers and other third parties.

In 2023, we rolled out ethics and compliance trainings in a new video format on Ethics and Code of Conduct (which has dedicated sections on human rights and modern slavery, workplace harassment, workplace violence, and health and safety) and Ethics reporting and whistleblowing. These video trainings are interactive, easy to follow, and contain questions to test the employees' understanding. The courses can be viewed in different languages, making the content more accessible by the EVBox employees in different geographical locations.

In addition to the mandatory trainings, we have been raising awareness of ethics and compliance topics and our "speak up" culture and promoting the use of the reporting hotline through awareness campaigns. Through these initiatives we hope to create an environment in which employees will feel comfortable raising issues that they spot in our business, which allows us to constantly improve our company and operations.

## 05 — Board Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2023. This statement has been approved by the management board of EVBox B.V. and signed:

Alexander Fedorczyk  
SVP Operations