



## **RWE Generation UK plc**

### **Anti-Slavery and Human Trafficking Statement 2022**

#### **INTRODUCTION**

RWE Generation UK plc (the “Company”) is committed to ensuring that neither it nor any part of its supply chain is involved in any activities relating to slavery, forced labour, servitude or human trafficking. The Company recognises that, as part of an international Group, it is incumbent upon it to take the necessary steps to combat this global issue.

This statement has been published in accordance with Section 54 of the Modern Slavery Act 2015.

#### **BUSINESS AND ORGANISATIONAL STRUCTURE**

The Company is a subsidiary of RWE Generation SE, a pan-European energy company. RWE Generation SE is a subsidiary of RWE AG and is responsible for power generation from gas, hard coal, hydro and biomass. The Company has a flexible, efficient power plant fleet and is bridging the gap to the new age of renewables. Together with partners from associations and corporations, the Company is also driving forward green hydrogen projects. RWE Generation SE is making a key contribution to the ambitious goal of RWE as a whole to be carbon-neutral by 2040.

In the UK, the Company has around 800 employees and its headquarters are in Swindon. The Company owns and operates the UK’s largest fleet of gas-fired power stations. The Company also operates 21 hydro sites across the UK and a highly efficient biomass combined heat and power plant in Markinch, Scotland. The total capacity of the Company’s UK fleet is just under 7.5GW.

#### **POLICIES AND PROCEDURES**

The Company is committed to ensuring that no practices of human trafficking or modern slavery exist in any part of its business or supply chain.

RWE AG is a signatory member of the United Nations Global Compact and the Company fully supports its ten principles, including the protection of internationally proclaimed human rights and the elimination of all forms of forced and compulsory labour. The RWE Code of Conduct adopts the core values of the United Nations Global Compact, which includes the elimination of all forms of forced and compulsory labour and the effective abolition of child labour.

The Company operates a number of internal policies, including the enforcement of relevant systems and controls, to ensure that it is conducting business in an ethical and transparent manner. For example, the Company’s recruitment process requires new employees, agency workers or fixed term contractors to comply with the RWE Code of Conduct.

The Company policies relating to Speak Up, Grievance, Bullying & Harassment and Recruitment & Selection also adopt the core values of RWE’s Code of Conduct.

RWE AG is also a founding member of the Bettercoal Initiative, which is a global, not-for-profit initiative. It was established by a group of major European utilities to promote the continuous improvement of corporate responsibility in the coal supply chain, with a specific focus on the mines themselves.

## **SUPPLY CHAINS**

The Company's supply chains include goods and services from both national and international suppliers.

The fuel used in the Company's power stations is procured by its affiliate, RWE Supply and Trading GmbH, which purchases a large proportion of its combustion fuels in global wholesale markets. RWE Supply and Trading GmbH is also separately subject to the requirements of The Modern Slavery Act 2015.

The Company has a number of measures in place to identify, assess and monitor its suppliers to ensure compliance with the Modern Slavery Act 2015 and to:

- Identify and assess potential risk in its supply chain
- Mitigate risk of slavery and human trafficking occurring in its supply chain
- Protect whistle blowers

As evidence of the Company's commitment to comply with the Modern Slavery Act 2015, it requires all contracting suppliers to comply with the RWE Code of Conduct, its Purchase Order Terms and Conditions and its Anti-slavery and Human Trafficking Policy. The Company implemented a revised version of the Anti-Slavery and Human Trafficking Policy in 2022, which has been developed by Procurement and Legal experts and is valid for all Procurement departments in the UK. This Policy has been produced to fulfil the requirements of the UK Modern Slavery Act 2015 and to demonstrate the Company's commitment against Modern Slavery.

The Company has a dedicated compliance team who work with legal and procurement experts to support the implementation and enforcement of the Modern Slavery Act 2015.

As part of the tender process, the Company requires suppliers to complete a Corporate Responsibility questionnaire, which is aligned to the Modern Slavery Act 2015. The questionnaire submission will form part of the supplier's tender offer and any resultant contract. As part of the questionnaire, suppliers are required to provide the Company with details of their own procedures to ensure there are no occurrences of slavery or human trafficking within their business or supply chains, along with any identified risks. The supplier is also required to inform the Company of any changes to their responses provided as part of the tender during the lifetime of the contract.

The Company will exclude any potential bidders that appear on the World Bank Sanctions Lists or the EU Sanctions Lists from its formal tender process. The Company's current suppliers are audited against these lists on a regular basis and further investigations are carried out if required.

The Company seeks to support suppliers who have limited resources and require additional advice on implementing strategies to ensure compliance with the legislation.

To maintain its knowledge on the best methods to mitigate the risks of slavery and human trafficking within its supply chains, representatives from the Company attend relevant industry-wide events. This includes attendance at the Modern Slavery and Human Rights Summit, where experts have been sharing their knowledge and experiences of the measures they take to ensure the absence of Modern Slavery within their own supply chains.

#### **KEY PERFORMANCE INDICATORS**

The Company is committed to implementation of all the required measures including the introducing of Key Performance Indicators (KPIs). The Company aims to further develop and implement KPIs in 2023. This will allow the Company to track and monitor compliance with Modern Slavery legislation and reduce the related risks.

#### **TRAINING**

The Company has implemented specific training on the Modern Slavery Act within its Procurement department, with the aim of completing the training on an annual basis. The training covers all aspects of countering modern slavery including countering modern slavery across the supply chain. Completion levels are monitored to ensure the training is successfully undertaken within the necessary timescales. The training has also been extended to other departments across the Company. In 2021 the Company's existing online training on Modern Slavery was reviewed and amended. The training was further rolled out in 2022 and extended to other operating companies within the RWE group.

The Company has also implemented awareness training on slavery and human trafficking in its compliance training, which is mandatory for all employees to complete annually.

This statement applies to RWE Generation UK plc and the following subsidiary company:

RWE Markinch Limited (06574689)

Registered office address: Windmill Hill Business Park, Whitehill Way, Swindon, Wiltshire, SN5 6PB

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's anti-slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2022.

**For and on behalf of RWE Generation UK plc**



**Will Jeffery, Director**