

# **RWE Generation UK plc. Anti-slavery and human trafficking policy**



**RWE**

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# Anti-slavery and human trafficking policy

This is an RWE Generation UK plc. (“the Company”) policy, which has been approved by the Company Board. The Company (including its subsidiaries) is committed to complying with the Modern Slavery Act 2015 and achieving best practice across all activities within our supply chain. We take ethical business practice very seriously and have zero tolerance to slavery and human trafficking, therefore compliance with the Modern Slavery Act 2015 and this policy is mandatory.

## Policy statement

The Company prohibits the use of modern slavery, forced labour, servitude, bonded labour, child labour and human trafficking in our operations and supply chain.

We have and will continue to implement systems and controls to ensure that neither modern slavery or human trafficking is taking place anywhere in our organisation or in any of our supply chains.

The Company and third party commercial organisations outside of our own organisation (“the Supplier”), have a responsibility to ensure that workers are not being exploited and that their relevant employment, health and safety, human rights laws and international standards are adhered to. The Company and its suppliers’ have a legal duty to drive out poor labour practices in their business and a moral duty to influence and incentivise continuous improvements to ensure their supply chain is free from slavery and human trafficking.

## Compliance

In performing its obligations under the agreement, the Supplier shall:

- comply with all applicable anti-slavery and human trafficking laws, statutes, regulations (and codes) including but not limited to the Modern Slavery Act 2015;
- comply with RWE Generation UK’s Anti-slavery and human trafficking policy;
- have its own measures in place to ensure that its organisation and supply chain is free from slavery and/or human trafficking;
- not engage in any activity, practice or conduct that would constitute an offence under sections 1, 2 or 4 of the Modern Slavery Act 2015 if such activity, practice or conduct were carried out in the UK;
- implement due diligence procedures to ensure that each of its (direct) subcontractors and suppliers comply with the Anti-slavery policy and with all applicable anti-slavery and human trafficking laws, statutes, regulations (and codes) including but not limited to the Modern Slavery Act 2015.

## Due Diligence

The Supplier represents and warrants that (at the date of the agreement):

- its response to the Company Corporate Responsibility questionnaire (if applicable), which also concerns slavery and human trafficking is complete and accurate;
- neither the Supplier nor any of its officers, employees (or other persons associated with it):
  - have been convicted of any offence involving slavery and/or human trafficking;
  - to the best of its knowledge have been or are the subject of any investigation, inquiry or enforcement proceedings by any governmental, administrative or regulatory body regarding any offence or alleged offence of or in connection with slavery or human trafficking.

## Reporting

The Supplier shall notify the Company as soon as it becomes aware of:

- any breach, or potential breach, of the Anti-slavery policy; or
- risks identified, which could result in a potential breach of the Anti-slavery policy
- any actual or suspected slavery and/or human trafficking in a supply chain which has a connection with any agreement with the Company.

## Record Keeping & Audit Keeping

The Supplier shall:

- maintain a complete set of records to trace the supply chain of all Goods and Services provided to the Company in connection with this agreement;
- permit the Company and its third party representatives, on reasonable notice, to have access to and take copies of the Supplier’s records and any other information and to meet with the Supplier’s personnel to audit the Suppliers compliance with its obligations.

## Training

The Supplier shall:

- implement training for its employees to ensure compliance with the Anti-slavery policy;
- keep a record of all training offered and completed by its employees to ensure compliance with the Anti-slavery policy and shall be able to make a copy of the record available to the Company upon request.

## Indemnity

The Supplier shall indemnify the Company against any losses, liabilities, damages, costs (including but not limited to legal fees) and expenses incurred by or awarded against the Company as a result of any breach of Anti-slavery policy.

## Warranties

The Supplier represents, warrants and undertakes that it conducts its business in a manner that is consistent with the Anti-slavery policy.

## Termination

The Company may terminate any agreement with immediate effect by giving written notices to the Supplier if the Supplier commits a breach of this Anti-slavery policy.

## Our Commitments

The Company upholds the following measures:

- We have a zero tolerance approach to modern slavery and human trafficking in our organisation and supply chains.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chains.
- We operate a number of internal policies including the enforcement of relevant systems and controls to ensure that we are conducting a business in an ethical and transparent manner.
- We have embedded the requirements of the Modern Slavery Act 2015 into our procurement process, which is regularly reviewed to ensure that the principles underpinning the legislation are considered where necessary.
- We identify, assess and monitor our suppliers to ensure compliance with the Modern Slavery Act 2015 to:

- Identify and assess potential risk in our supply chains.
- Mitigate any risk of slavery or human trafficking occurring in our supply chains.
- Protect whistle blowers.

- We take a risk-based approach to our contracting processes and communicate with existing suppliers considered high risk to confirm compliance with the Modern Slavery Act 2015 and the RWE Code of Conduct.
- We require suppliers to inform the Company of any identified risks or breaches of the Modern Slavery Act 2015 in order to take the appropriate action e.g. remediating of a breach or potentially terminating an agreement depending on the severity of the breach.
- We implement specific training on Modern Slavery Act 2015 to ensure its significance is communicated, reduce the risk of slavery occurring in our organisation and supply chains.

## Scope

This document applies to:

- RWE Generation UK plc (the UK Generation business) including all its subsidiary companies and its suppliers.
- RWE Markinch Limited
- RWE KL Limited