

RWE

RWE Generation UK and RWE Renewables UK Anti-Slavery and Human Trafficking Policy

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Introduction

 This Anti-Slavery and Human Trafficking Policy (“MSA Policy”) has been adopted by the UK divisions of RWE Generation and RWE Renewables (“RWE” or “We”).

We are 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. 

Policy statement

RWE prohibits the use of modern slavery in all its forms such as forced labour, servitude, bonded labour, child labour and human trafficking in its operations and supply chain.

RWE has in place, and will continue to implement, systems and controls to reduce the risk of Modern Slavery and human trafficking in its organisation and its supply chains.

RWE and each of its Counterparties 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. RWE and its supply chain have a legal duty to drive out poor labour practices in their business and a duty to influence and incentivise continuous improvements to reduce the risk of Modern Slavery in its supply chain. This MSA Policy reflects that commitment and seeks to identify and manage Modern Slavery risk in our business.

Compliance

RWE will endeavour to ensure that in its Agreements and contractual relationships Counterparties will be requested to:

- comply with all Applicable Laws including but not limited to the Modern Slavery Act 2015
- comply with this MSA Policy
- comply with RWE's Code of Conduct as attached or referred to in the Agreement
- support and enact the principles established in the Global Compact and comply with the UN Guiding Principles
- have its own measures in place to ensure that its organisation and supply chain is free from Modern Slavery
- 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 subcontractors and suppliers comply with this MSA Policy and with all Applicable Laws including but not limited to the Modern Slavery Act 2015.

Due Diligence

Each Counterparty will be requested to represent and warrant that (at the date of the relevant Agreement):

- its response to any questionnaires issued by RWE and all responses and statements on the subject of this MSA Policy are true and accurate;
- it acknowledges that RWE is placing a reliance upon these responses and statements in dealing with the Counterparty, and may be induced to enter into the Agreement based on those responses and statements; and
- it conducts its business in a manner that is consistent with this MSA Policy.

Reporting

Each Counterparty shall be requested to notify RWE as soon as it becomes aware of:

- any breach, or potential breach, of this MSA Policy
- identified risks, which could result in a potential breach of this MSA Policy
- any actual or suspected slavery and/or human trafficking in a supply chain which had or has a connection with any Agreement with RWE

Record Keeping & Audit Keeping

Each Counterparty will be requested to:

- provide transparency of the supply chain of all goods and/or services provided to RWE in connection with each Agreement
- permit RWE and/or RWE's third party representatives, on reasonable notice, to have access to and take copies of the Counterparty's records and any other appropriate information, and/or where required permit access (during normal working hours) to the Counterparty's premises and to any premises of its supply chain where any services in connection with the Agreement are being performed and/or any goods are being produced or services are being performed, and/or to meet with the

Counterparty's Personnel to audit the Counterparty's compliance with its obligations including for the following purposes:

- make site inspections as part of bid evaluation;
- make spot checks/site visits to validate compliance; and
- use an independent auditor to validate compliance.

Training

Each Counterparty will be requested to:

- offer trainings for its employees to ensure compliance with this MSA Policy
- keep a record of all training offered and completed by its employees to ensure compliance with this MSA Policy and shall be able to make a copy of the record available to RWE upon request.

Our Commitments

RWE 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 support our efforts in conducting a business in an ethical and transparent manner
- We have considered the requirements of the Modern Slavery Act 2015 in 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 and contractors to support 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 aim to use key performance indicators to track and reflect our measures introduced to support the Modern Slavery Act 2015
- We request suppliers and contractors to inform us of any identified risks or breaches of the Modern Slavery Act 2015 in order to take appropriate actions e.g. remediating of a breach or potentially terminating an Agreement depending on the severity of the breach
- We implement a specific training on the Modern Slavery Act 2015 to ensure its significance is communicated and to reduce the risk of slavery occurring in our organisation and supply chains.

Scope

This documents applies to:

- RWE Generation UK Holdings Limited
- RWE Generation UK plc
- RWE Markinch Limited
- RWE Renewables UK Limited,
- RWE Renewables UK Swindon Limited
- RWE Renewables Management UK Limited
- Any direct and indirect subsidiary companies of the above companies
- All Counterparties

Glossary of terms

A glossary of terms and their respective meanings within this MSA Policy:

Term	Description
'Agreement'	A written agreement between the Counterparty and any part of RWE , including any purchase order
'Applicable Laws'	means all laws, regulations, statutes, orders, decrees, injunctions, direction licences, permits, consents, approvals, agreements, regulations, bye-laws, judgements, decrees, orders or interpretations of any Competent Authority, court or tribunal having jurisdiction over the matter in question all as may be extended, amended, consolidated, repealed or re-enacted together with any subordinate legislations, issued from time to time by any Competent Authority. In this context, 'Competent Authority' means any authority or other agency empowered by Applicable Laws including planning authorities, local authorities, police, security agencies, fire, health and safety agencies, environment agencies, marine environmental agencies, any national or state or local government or governmental department or legislative minister or commission or regulator, board, body, bureau, agency (whether state or supranational), any authority, instrumentality, court or other judicial or administrative body be it central or local having jurisdiction over a party and/or performance of any other obligation(s) of the parties under the Agreement in respect of Modern Slavery
'Counterparty'	Any organisation that has entered into an Agreement with any part of RWE
'Global Compact'	Global Compact Initiative of the United Nations in the areas of human rights, labour standards, the environment and anti-corruption, as set out at www.unglobalcompact.com
'Modern Slavery'	In this MSA Policy when referring to 'Modern Slavery' this is referring to recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. This includes holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after. This includes any modern slavery as defined by those Applicable Laws, codes or conventions which apply during the Agreement
'Personnel'	All personnel whom the Counterparty utilises in the performance of the Agreement including employees, servants, officers, directors and/or agents, and any party or person employed by or engaged on behalf of the Counterparty
UN Guiding Principles	The United Nations Guiding Principles on Business and Human Rights which can be found at https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf

When reference is made in this MSA Policy to specific legislation, this means such legislation as may be extended, amended, consolidated, repealed or re-enacted together with any subordinate legislations, issued from time to time by any Competent Authority.

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