



## **RWE Generation UK plc**

### **Anti-Slavery and Human Trafficking Statement 2024**

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. The statement constitutes the Companies’ anti-slavery and human trafficking statement for the financial year ending 31 December 2024.

This statement is also made on behalf of the following wholly owned subsidiary company:

- RWE Markinch Limited

The Company and RWE Markinch Limited together being “the Companies”

### **Organisation’s Structure, Business and Supply Chains**

#### **Structure**

The Companies are ultimately owned by RWE AG, which owns the Companies through its subsidiary, RWE Generation SE, a pan-European company. RWE AG, an international energy company, has four business segments – Generation, Power, Supply & Trading and Renewables.

RWE is leading the way to a green energy world. With its investment and growth strategy Growing Green, RWE is contributing significantly to the success of the energy transition and the decarbonisation of the energy system. Around 20,000 employees work for RWE in almost 30 countries worldwide. RWE is one of the leading companies in the field of renewable energy.

RWE is investing billions of euros worldwide in offshore and onshore wind, solar energy, batteries, flexible generation, and hydrogen projects. It is perfectly complemented by its global energy trading business. RWE is decarbonising its business in line with the 1.5-degree reduction pathway and will phase out coal by 2030. RWE will be net-zero by 2040, fully in line with the company’s purpose - Our energy for a sustainable life.

#### **Business in the UK**

RWE is the UK’s largest power producer, and a leading renewables developer, generating enough to power for around 12 million homes, with a diverse portfolio of wind, solar, hydro, biomass and gas.

In the UK, the Company has around 880 employees and has its headquarters 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 around 7GW.

RWE is considering decarbonisation options for its operational power stations including carbon capture technology. In addition, we are investigating Green Hydrogen plants to support industrial decarbonisation.

## **RWE's approach to tackling modern slavery and human trafficking**

Throughout 2024, the Companies have been committed to act ethically and responsibly in all business relationships, and adopt a zero tolerance to slavery and human trafficking in any part of their business or supply chain.

Our policies are aligned with and adopt the core values of the [RWE Code of Conduct](#). This Code of Conduct applies across the entire RWE Group, and adopts the core values of the United Nations Global Compact, including recognising, supporting, and putting into practice the United Nations Global Compact's 10 principles pertaining to human rights, labour standards, environmental protection and anti-corruption in all our areas of influence.

The Anti-Slavery and Human Trafficking Policy ("MSA Policy"), created to fulfil all requirements of the Modern Slavery Act 2015 and to demonstrate the Companies' commitment against modern slavery was launched in 2022.

### **Our people**

- The Companies operate a number of internal policies, including the enforcement of relevant systems and controls, to ensure that they are conducting business in an ethical and transparent manner. For example, the Companies' recruitment process requires new employees, agency workers or fixed term contractors to comply with the RWE Code of Conduct.
- The Companies have established policies and guidance relating to Speak Up, Grievance, Bullying & Harassment, and Recruitment & Selection, which also adopt the core values of RWE's Code of Conduct.

### **Our Supply Chains**

- We are committed to ensuring that there is no human trafficking or slavery in any part of our business or our supply chains. Our supply chains include goods and services from both national and international suppliers.
- We are committed to recognising, supporting and putting into practice the United Nations Global Compact's 10 principles pertaining to human rights, labour standards, environmental protection and anti-corruption in all areas of influence.
- Our General Terms and Conditions for procurement require all our suppliers to comply with the RWE Code of Conduct. The RWE Code of Conduct is consistent with the "Labour standards" set out in the United Nations Global Compact. They require all of our suppliers, both through their own activities and those within their own supply chains, to ensure that they do not commit any offences of "slavery, servitude and forced or compulsory labour", "child labour" or "human trafficking". Our General Terms and Conditions for procurement also contain a specific Modern Slavery clause that requires the supplier to comply with the requirements of the Modern Slavery Act 2015.

### **Due diligence processes in relation to slavery and human trafficking within our supply chains**

The Companies continue to take appropriate steps to identify, assess and continually monitor suppliers to ensure compliance with the Modern Slavery Act 2015. In particular:

- As part of the Companies' supplier selection process, suppliers meeting a certain qualification criteria need to complete our Corporate Questionnaire which contains a question on Modern Slavery and the respective applicability. In addition, RWE introduced a risk-based methodology in 2024 which means that

suppliers identified with a potential higher risk of human rights issues undergo additional assessments and further checks.

- The Companies exclude any potential bidders that appear on the World Bank Sanctions Lists or the EU Sanctions Lists from their tender process for procurement spend.
- The Companies' existing and potential suppliers are checked against sanction lists on a daily basis and further investigations are carried out if required.
- RWE developed the Human Rights Risk Management System, which provides a framework to put the principles of the [Policy Statement](#) on RWE's Human Rights Strategy into practice see [www.rwe.com](http://www.rwe.com). The objective of the Human Rights Risk Management System is to be the overarching framework of all the actions supporting Human Rights due diligence implementation. It aims for the prevention of potential or remediation of actual breaches in Human Rights and/or related Environmental Obligations, according to the requirements of the German Act on Corporate Due Diligence Obligations in Supply Chains (the "German Supply Chain Act" or "Lieferkettensorgfaltspflichtengesetz" or "LkSG"). Measures taken to comply with the German Supply Chain Act enhances RWE's efforts in dealing with Human Rights risks.
- All contracting suppliers are requested to comply with the RWE Code of Conduct, and Human Rights Contract Appendix. In the event of a suspected violation of our policies, we reserve the right to audit any of our suppliers' operations, facilities and working conditions, as well as their quality, environmental, ethical and health & safety procedures and systems.
- The Companies conduct regular supply chain risk assessments on the information received from our existing and potential suppliers. Furthermore, suppliers are required to inform the Companies of any changes to their responses provided as part of a tender process during the lifetime of the contract.

#### **Key Performance indicators for 2024**

The Companies have a dedicated Compliance Officer who works with legal and procurement experts to support the implementation and enforcement of the Modern Slavery Act 2015.

To ensure a high level of understanding of the risks of modern slavery and human trafficking within our supply chains and businesses, we successfully delivered Modern Slavery Act 2015 training to relevant procurement personnel, helping them to better identify any potential human trafficking and modern slavery issues.

In addition to the annual Modern Slavery Act 2015 training, procurement personnel received training on the requirements to ensure compliance with the German Supply Chain Act as of 2023, as well as regular training on Supplier Qualification and use of the supplier risk monitoring tool.

#### **Our plans for 2025**

The Companies will continue to regularly review and update processes to ensure that any such risks of slavery and human trafficking are appropriately identified and managed effectively.

Modern slavery training will take place annually within the Procurement team and across further business areas, where applicable.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes the Companies' anti-slavery and human trafficking statement for the financial year ending 31 December 2024.



**Will Jeffery**  
**Director**

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

**31 July 2025**