

## **RWE Renewables Anti-Slavery and Human Trafficking Statement 2023**

RWE Renewables 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. We recognise that, as part of an international company, with one of the largest power generation portfolios in the world, it is incumbent upon us to take the necessary steps to combat this global issue.

This statement is made by **RWE Renewables UK Limited**, **RWE Renewables UK Swindon Limited** and **RWE Renewables Management UK Limited**, as the ultimate UK holding companies of the RWE Renewables Group (the "RWE Companies"), pursuant to section 54(6) of the UK's Modern Slavery Act 2015 (the "Act"). The statement constitutes the Companies' anti-slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2023.

This statement is also made on behalf of the following wholly owned subsidiary companies (the "RWE Subsidiary Companies"):

- **RWE Renewables UK Onshore Wind Limited**
- **RWE Renewables UK London Array Limited**
- **RWE Renewables UK Wind Services Limited**
- **RWE Renewables UK Robin Rigg East Limited**
- **RWE Renewables UK Robin Rigg West Limited**

The RWE Companies and the RWE Subsidiary Companies 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 Renewables Europe and Australia GmbH. Management and decisions are carried out in two functional organisations, in the onshore business in Europe & Australia led by RWE Renewables Europe and Australia GmbH, and in the offshore business led by RWE Offshore Wind GmbH.

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 the company in almost 30 countries worldwide. RWE is already one of the leading companies in the field of renewable energy.

Between 2024 and 2030, RWE will invest 55 billion euros worldwide in offshore and onshore wind, solar energy, batteries, flexible generation, and hydrogen projects. By the end of the decade, the company's green portfolio will grow to more than 65 gigawatts of generation capacity, which will be perfectly complemented by global energy trading.

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, supplying around 15 % of the country's electricity – enough to power over 14 million UK homes – with a diverse operational portfolio of onshore wind, offshore wind, hydro, biomass and gas, amounting to around 10 gigawatts (GW) pro rata (12 GW installed capacity).

RWE is a leader in renewable energies in the UK, having pioneered both onshore and offshore wind over more than 20 years. The company already operates 3.7 gigawatts (GW) of wind capacity (RWE share 2.1GW).

RWE is continuing to develop a new portfolio of offshore and onshore wind, as well as the recent acquisition of a solar PV development company, and intends to pursue floating wind.

Overall, and including its committed investments in projects already under construction, RWE expects to have invested up to £15billion in new green technologies and infrastructure in the UK between 2021 to 2030.

We employ around 1339 staff and 237 contractors in the UK, across 43 operational sites, 4 regional offices and our headquarters based in Swindon.

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

Throughout 2023, the Companies have been committed to act ethically and responsibly in all their 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 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**

We take appropriate steps to verify that potential suppliers are not currently, nor have been previously involved in slavery or human trafficking.

Our supplier qualification process is applied to all new and potential suppliers that meet our qualifying criteria and our procurement contracts require that modern slavery is not taking place in the supplier's business and/or their supply chains.

During 2023 we continued to identify and implement ways of strengthening our due diligence policies and procedures in relation to slavery and human trafficking within our supply chains. We conduct regular supply chain risk assessments on the information received from our existing and new suppliers in particular:

- The Companies require suppliers to complete a Corporate Questionnaire, which includes a Modern Slavery related question and three self-assessments on Environmental Protection, Human Rights & Labour as well as Supply Chain Responsibility.
- As part of the Companies' supplier selection process, suppliers are required to provide the Companies with details of their own procedures to ensure there are no occurrences of slavery or human trafficking within their business or supply chains. The supplier is also required to inform the RWE Companies of any changes to their responses that occur at any point during the lifetime of any contract.
- 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.

In August 2023, we introduced a mandatory check for new and potential business partners against (sanctions) lists using an external system.

- The Companies' existing suppliers are checked against these sanction lists on a daily basis and further investigations are carried out if required.

In 2023, 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"). This law came into force in 2023 and applies to German companies above certain thresholds in their global operations. Measures taken to comply with the German Supply Chain Act enhances RWE's efforts in dealing with Human Rights risks.

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. This is to ensure compliance with the RWE Code of Conduct and the Anti-Slavery and Human Trafficking Policy. As part of our supplier qualification process we reserve the right to have access to, and to audit, our supplier's supply chain if required.

### **Key Performance indicators for 2023**

- The Companies have a dedicated Compliance team who work 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 2024**

We will conduct a review and in depth evaluation of the different elements of the Human Rights Risk Management System after its first year of implementation and any identified gaps or necessary improvements will be tackled in 2024.

Modern slavery training will take place annually within the Procurement team.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes the Companies' slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2023.

This statement was approved by the Directors of RWE Renewables UK Limited, RWE Renewables UK Swindon Limited and RWE Renewables Management UK Limited as the ultimate UK holding companies of the RWE Renewables Group, on 5th March 2024.



**Tom Glover, Director**

**For and on behalf of  
RWE Renewables UK Limited  
RWE Renewables UK Swindon Limited  
RWE Renewables Management UK Limited**

**Date 5th March 2024**