



## **RWE Generation UK plc**

### **Anti Slavery and Human Trafficking Statement 2025**

#### **INTRODUCTION**

RWE Generation UK plc (the “Company”) remains 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. As part of an international group, the Company recognises its responsibility to take robust and proactive steps to combat this global issue and to continuously improve its approach.

This statement is published in accordance with Section 54 of the UK Modern Slavery Act 2015 and sets out the actions taken by the Company during the year ending 31 December 2025 to prevent modern slavery and human trafficking in its business and supply chains.

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

The Company is a subsidiary of RWE AG, a pan European energy company responsible for power generation from gas, hydro and biomass. The Company continues to operate a flexible, efficient power plant fleet, generating enough to power for around 12 million homes whilst supporting security of supply and helping to bridge the gap to the new age of renewables. Together with partners from associations and corporations, the Company is also participating in and driving forward green hydrogen projects. RWE Generation SE contributes to RWE’s overarching ambition to be carbon neutral by 2040.

In the UK, the Company employs approximately 813 employees, and its headquarters are located in Swindon. The Company owns and operates the UK’s largest fleet of gas fired power stations, operates 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 approximately 9 GW.

This statement also applies to the following subsidiary:

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| <p><b>RWE Markinch Limited</b> (06574689) – Registered office: Windmill Hill Business Park, Whitehill Way, Swindon, Wiltshire, SN5 6PB</p> |
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## POLICIES AND PROCEDURES

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

RWE AG is a signatory to the United Nations Global Compact, and the Company fully supports its ten principles, including the protection of internationally proclaimed human rights, the elimination of all forms of forced and compulsory labour and the effective abolition of child labour. These values are reflected in the [RWE Code of Conduct](#), which sets out the standards expected of all employees and business partners.

The Company operates a number of internal policies and procedures, supported by appropriate systems and controls, to ensure that it conducts its business in an ethical and transparent manner. These include:

- **RWE Code of Conduct** – requiring all employees, agency workers and fixed term contractors to comply with RWE’s ethical and social standards, including the prohibition of forced labour and child labour
- **Whistleblowing policy** – encouraging employees and third parties to report concerns, including any suspicions of modern slavery or human trafficking, with protections against retaliation
- **Grievance and Bullying & Harassment policies** – supporting a safe and respectful working environment and providing clear mechanisms for raising concerns
- **Recruitment & Selection policies** – ensuring that recruitment is conducted in a fair, transparent and compliant manner and that all necessary right to work checks and due diligence are carried out for employees, agency workers and contractors

These policies are reviewed periodically and updated where necessary to reflect legal developments, best practice and the Company’s ongoing commitment to human rights.

## SUPPLY CHAINS

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

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

- Identify and assess potential risks in its supply chains
- Mitigate the risk of slavery and human trafficking occurring in its supply chains

- Protect whistleblowers and encourage reporting of concerns

As evidence of its commitment, the Company requires all contracting suppliers to comply with:

- The **RWE Code of Conduct**
- Its **Purchase Order Terms and Conditions**
- Its **Anti Slavery and Human Trafficking Policy**

A revised version of the Anti Slavery and Human Trafficking [Policy](#), developed jointly by Procurement and Legal experts and applicable to all Procurement departments in the UK, has been implemented previously and continues to be refined to fulfil the requirements of the UK Modern Slavery Act 2015 and to demonstrate the Company's commitment to combating modern slavery. This policy continues to be applied and reviewed, and any necessary updates are implemented to reflect evolving best practice and regulatory expectations.

The Company has a dedicated compliance team that works closely with legal and procurement experts to support the implementation and enforcement of the Modern Slavery Act 2015 across the business.

### **Supplier Due Diligence and Tender Processes**

As part of the tender process, the Company requires suppliers to complete a Corporate Responsibility questionnaire aligned to the Modern Slavery Act 2015. The questionnaire forms part of the supplier's tender submission and any resultant contract. Suppliers must provide:

- Details of their own procedures to prevent slavery and human trafficking in their business and supply chains
- Information on any identified risks and how these are managed
- An obligation to inform the Company of any material changes to their responses during the lifetime of the contract

Potential bidders that appear on the World Bank Sanctions Lists or the EU Sanctions Lists are excluded from the formal tender process. Current suppliers are audited against these lists on a regular basis, and further investigations are carried out where required.

The Company seeks to engage constructively with suppliers, particularly those with more limited resources, offering additional advice and support on implementing strategies to ensure compliance with applicable legislation, including modern slavery requirements.

In addition, the Company maintains awareness of best practice and evolving methodologies to mitigate modern slavery and human trafficking risks in its supply chains. Representatives from the Company continue to attend relevant industry wide events and forums, such as modern slavery and human rights conferences and summits, to share knowledge and learn from other organisations' experiences.

## **RISK ASSESSMENT AND MANAGEMENT**

The Company recognises that certain areas of its operations and supply chains may pose a higher risk of modern slavery and human trafficking, for example where goods or services originate from high risk regions or sectors. Risk assessment is embedded into procurement and supplier management processes and is supported by:

- Screening against relevant sanctions and watch lists
- Review of supplier responses to Corporate Responsibility questionnaires
- Contractual commitments to comply with RWE's policies and relevant legislation
- Ongoing monitoring and escalation of concerns where potential risks are identified

Where higher risk suppliers or categories are identified, the Company may undertake enhanced due diligence, request additional information or assurances, or put in place further contractual safeguards. In cases of serious concern, the Company reserves the right to suspend or terminate relationships with suppliers who fail to meet its standards.

## **KEY PERFORMANCE INDICATORS (KPIs)**

The Company remains committed to implementing and enhancing key performance indicators (KPIs) to monitor the effectiveness of its efforts to combat modern slavery and human trafficking. In line with the intention set in earlier years, the Company is focused on developing and tracking KPIs that may include, among others:

- Completion rates for modern slavery training across relevant functions and the wider employee population
- The proportion of tenders and contracts that include modern slavery due diligence steps (e.g. completion of the Corporate Responsibility questionnaire)
- The number of suppliers screened against sanctions and watch lists and the outcomes of that screening

- The number and nature of any modern slavery related concerns raised through Speak Up or other reporting channels and the actions taken in response

These KPIs are being refined and implemented to provide better visibility of performance and to support continuous improvement in the Company's approach to modern slavery risk management.

## **TRAINING AND AWARENESS**

The Company recognises that awareness and understanding among employees is critical to effectively identifying and mitigating the risk of modern slavery and human trafficking.

Specific training on the Modern Slavery Act and modern slavery risk is in place within the Procurement department, with the intention that this training is completed on an annual basis. The training covers all aspects of countering modern slavery, including how to identify risk indicators and how to manage and escalate concerns across the supply chain. Completion levels are monitored to ensure that relevant employees complete the training within the necessary timescales.

This training has been extended beyond Procurement to other departments across the Company. The Company's online training on Modern Slavery, which was previously implemented, continues to be rolled out and is regularly reviewed and updated to ensure it remains current and effective. This training is also embedded within our procurement processes and system tools, which are used across the entire department on a daily basis, helping to ensure that modern slavery considerations are consistently integrated into our daily activities.

In addition, awareness training on slavery and human trafficking is incorporated into the Company's general compliance training, which is mandatory for all employees to complete annually. This helps ensure that all employees understand the risks of modern slavery and human trafficking, recognise potential warning signs and know how to report any concerns.

## **CONTINUOUS IMPROVEMENT**

The Company understands that combating modern slavery and human trafficking requires ongoing vigilance and continuous improvement. During 2026 and beyond, the Company intends to:

- Further refine and implement its KPIs to better measure effectiveness and drive improvements
- Continue to strengthen supplier due diligence, particularly in higher risk categories
- Enhance training content and coverage to reflect emerging risks and best practice
- Maintain engagement with industry initiatives, peers and expert organisations to share experiences and improve approaches

The Company will continue to review the effectiveness of its policies, procedures and controls in this area and will make adjustments as necessary.

## **APPROVAL**

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 year ending 31 December 2025.

Signed for and on behalf of RWE Generation UK plc and RWE Markinch Limited:



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Will Jeffery, Director

26 June 2026