

## **RWE Renewables Anti-Slavery and Human Trafficking Statement 2022**

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 "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 2022.

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

- **RWE Renewables UK Onshore Wind Limited**
- **RWE Renewables UK London Array Limited**
- **RWE Renewables UK Wind Services Limited**

## **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 GmbH. Management and decisions are carried out in the two functional organisations, in the onshore business in Europe & Australia led by RWE Renewables 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 an extensive investment and growth strategy, the RWE Group will expand its powerful, green generation capacity to 50 gigawatts internationally by 2030. RWE is investing €50 billion gross for this purpose in this decade. The portfolio is based on offshore and onshore wind, solar, hydrogen, batteries, biomass and gas. RWE Supply & Trading provides tailored energy solutions for large customers.

RWE has locations in the attractive markets of Europe, North America and the Asia-Pacific region. The company is responsibly phasing out nuclear energy and coal. Government-mandated phaseout roadmaps have been defined for both of these energy sources.

RWE employs around 19,000 people worldwide and has a clear target: to get to net zero by 2040. On its way there, the company has set itself ambitious targets for all activities that cause greenhouse gas emissions. The Science Based Targets initiative has confirmed that these emission reduction targets are in line with the Paris Agreement. Very much in the spirit of the company's purpose: Our energy for a sustainable life.

### **Business in the UK**

RWE is one of the UK's largest power producers, supplying around 15 % of the country's electricity – enough to power over 10 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 invest around £15billion in new green technologies and infrastructure in the UK by 2030.

We employ around 1097 staff and 199 contractors in the UK, across 45 operational sites, 4 regional offices and our headquarters based in Swindon.

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

Throughout 2022, 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 its 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 it is 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 Procurement Terms and Conditions 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". This is consistent with the requirements of the Modern Slavery Act 2015.
- The Companies require suppliers to complete a Corporate Questionnaire and a Sustainability Questionnaire covering Human Rights and Modern Slavery related questions.

- At the end of 2022 we also invited the first suppliers to join the supplier monitoring tool IntegrityNext. As part of the tool, suppliers will be monitored in Social Media and required to complete (as a minimum) the three self-assessment questionnaires Human Rights & Labour, Environmental Protection, Supply Chain Responsibility.
- As part of the 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 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.
- The Companies' current suppliers are audited against these lists on a regular basis and further investigations are carried out if required.

### **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.

RWE Procurement requires all suppliers and contractors to comply with the RWE Code of Conduct. Our supplier qualification process is applied to all new suppliers that meet our qualifying criteria who must provide formal confirmation that there is no modern slavery taking place within their business or within their own supply chains.

During 2022 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 the event of a suspected violation of our policy, 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 our 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 tier 1 supplier's supply chain if required.

### **Key Performance indicators for 2022**

- 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 training to procurement personnel, helping them to better identify any potential human trafficking and modern slavery issues.
- In addition to the Modern Slavery Act training, procurement personnel received training in relation to the German Supply Chain Due Diligence Act and connected requirements to ensure compliance with the new law as of 2023.

## Our plans for 2023

Our IntegrityNext tool will be implemented to support the supplier qualification process.

A new Human Rights Appendix and contract clause based on the German Supply Chain Due Diligence Act 2023 will form part of procurement contracts. The existing UK Modern Slavery Clause will be maintained.

A more detailed Human Rights Risk analysis to prevent any kind of modern slavery and human trafficking will be conducted. In 2022, we performed a Human Rights Risk analysis, which will be centrally further developed and conducted on an annual basis. Based on the analysis results from 2022, we will perform more detailed human rights checks for potential "high-risk" suppliers and develop suitable measures together with our newly introduced human rights expert team in RWE Group.

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

A further appropriate training scheme for the German Due Diligence Act 2023 will be reviewed in 2023.

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 2022.

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 RWE Renewables, on 28th day of March 2023.



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**Tom Glover, Director**

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

**Date 28th March 2023**