

## **RWE Renewables Slavery and Human Trafficking Statement 2021**

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' slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2021.

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 Robin Rigg East Limited**
- **RWE Renewables UK Robin Rigg West Ltd**
- **RWE Renewables UK Wind Services Limited**

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

### **Structure**

The Companies are part of RWE Renewables GmbH, a unit of RWE AG.

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 company 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.

**RWE Renewables UK Swindon Limited:** Windmill Hill Business Park, Whitehill Way, Swindon, Wiltshire SN5 6PB. Registered in England and Wales no. 2550622

**RWE Renewables UK Limited:** Greenwood House, Westwood Way, Westwood Business Park, Coventry, United Kingdom CV4 8PB. Registered in England and Wales no. 03758404

**RWE Renewables Management UK Limited:** Windmill Hill Business Park, Whitehill Way, Swindon, Wiltshire SN5 6PB. Registered in England and Wales no. 12087808

## **Business in the UK**

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 also developing a portfolio of new onshore wind whilst pursuing floating wind ambitions in Scotland and in the Celtic Sea, off the coast of South West Wales. Overall, and including its committed investments in projects already under construction, RWE expects to invest around £15 billion in new green technologies and infrastructure in the UK by 2030.

We employ around 917 staff and 159 contractors in the UK, across 44 operational sites, 4 regional offices and our headquarters based in Swindon and Coventry.

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

Throughout 2021, 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.

Throughout 2021 the Companies have developed a wide range of internal policies, standards and processes to assist in tackling slavery and human trafficking. As part of this, a detailed Anti-Slavery and Human Trafficking Policy was developed by Procurement and Legal experts. This Anti-Slavery and Human Trafficking Policy ("MSA Policy") has been created to fulfil all requirements of the UK Modern Slavery Act 2015 and to demonstrate the Companies' commitment against modern slavery. This policy will be implemented 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 Compacts 10 principles pertaining to human rights, labour standards, environmental protection and anti-corruption in all areas of influence.
- Our Procurement Terms and Conditions required all our suppliers to comply with the RWE Codes of Conduct. The RWE and 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.
- As part of the pre-qualification process, the Companies requires suppliers to complete a Sustainable Procurement questionnaire, which is aligned to the Modern Slavery Act 2015. The questionnaire submission will form part of the supplier's tender offer and any resultant contract. As part of the questionnaire, 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, along with any identified risks. The supplier is also required to inform the Companies of any changes to their responses provided 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 its formal tender process. The Companies' current suppliers are audited against these lists on a regular basis and further investigations are carried out if required.
- In addition, our Procurement Terms and Conditions make specific reference to 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.
- We require all suppliers and contractors to comply with the RWE Code of Conduct and also have pre-qualification checks carried out on all relevant new suppliers. These require suppliers to provide formal confirmation that there is no modern slavery taking place within their business or within their own supply chains. This applies to all suppliers, including those suppliers operating outside of UK.
- During 2021 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.
- 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 our Sustainability Policy. As part of our pre-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 to measure effectiveness of steps taken**

The Companies are committed to implementation of all the required measures. The key performance indicators will be developed and implemented in 2022. This will allow the Companies to track and monitor the compliance with modern slavery legislation and reducing the related risks.

These key performance indicators are likely to relate to the training, supply chain risk assessment and adherence to the policies.

## **Training available to staff regarding slavery and human trafficking.**

- 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 developed Modern Slavery training for our procurement staff. This will help them to better identify any potential human trafficking and modern slavery issues.
- Throughout 2021 a lot of our processes have been subject to revision and improvement. Our plans for 2022 include implementing our Modern Slavery training and strengthening risk assessments, to make our response to modern slavery and human trafficking more robust.

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 31st December 2021.

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 3rd May 2022.



**Tom Glover**

**Director**

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

**Date 3<sup>rd</sup> May 2022**