

## Modern Slavery Act 2015

### RWE Generation UK plc (and subsidiaries) Modern Slavery and Human Trafficking Statement

#### INTRODUCTION

We are committed to ensuring that neither RWE Generation UK plc (“the Company”) nor any part of our 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 has been published in accordance with Section 54 of the Modern Slavery Act 2015.

#### OUR BUSINESS AND ORGANISATIONAL STRUCTURE

The Company is part of RWE Generation SE, which is a pan-European energy company with over 40GW of generating capacity. RWE Generation SE is a subsidiary of RWE AG.

RWE Generation SE, located in Essen, Germany, is responsible for power generation from gas, hard coal, hydropower and biomass. It benefits from the combined expertise of around 2,800 employees across power plants in Germany, the UK, the Netherlands and Turkey. RWE Generation SE operates power stations with a total capacity of around 25 gigawatts, contributing to maintaining energy security to the pan-European grid.

In the UK, the Company has around 1,100 employees and its headquarters are in Swindon. The Company owns and operates the UK’s largest fleet of gas-powered stations, along with some coal and a small amount of biomass. It is the second largest generator, supplying just over 10% of the UK’s electricity with over 8.5GW of installed capacity.

#### OUR POLICIES AND PROCEDURES

We are committed to ensuring that no practices of human trafficking or modern slavery exist in any part of our business or supply chain.

RWE AG is a signatory member of the United Nations Global Compact and we fully support its ten principles, including the protection of internationally proclaimed human rights and the elimination of all forms of forced and compulsory labour. The [RWE Code of Conduct](#) adopts the core values of the United Nations Global Compact, which includes the elimination of all forms of forced and compulsory labour and the effective abolition of child labour.

We operate a number of internal policies, including the enforcement of relevant systems and controls, to ensure that we are conducting business in an ethical and transparent manner. For example, the Company’s recruitment process ensures that new employees, agency workers or fixed term contractors comply with the RWE Code of Conduct.

The Company policies relating to Speak Up, Grievance, Bullying & Harassment, and Recruitment & Selection also adopt the core values of RWE’s Code of Conduct.

RWE AG is also a founding member of the Bettercoal Initiative, which is a global, not-for-profit initiative. It was established by a group of major European utilities to promote the continuous improvement of corporate responsibility in the coal supply chain, with a specific focus on the mines themselves.

## **OUR SUPPLY CHAINS**

Our supply chains include goods and services from both national and international suppliers.

The fuel used in our power stations is procured by RWE Supply and Trading GmbH, which purchases a large proportion of its combustion fuels in global wholesale markets. RWE Supply and Trading GmbH is also separately subject to the requirements of The Modern Slavery Act 2015.

We have a number of measures in place to identify, assess and monitor our suppliers to ensure compliance with the Modern Slavery Act 2015 and to:

- Identify and assess potential risk in our supply chain
- Mitigate risk of slavery and human trafficking occurring in our supply chain
- Protect whistle blowers

As evidence of our commitment to comply with the Modern Slavery Act 2015, we require all contracting suppliers to comply with our RWE Code of Conduct, [Procurement Policy](#), [Purchase Order Terms and Conditions](#) and [Anti-slavery and human trafficking policy](#).

We have a dedicated Compliance Team, who work with legal and procurement experts to support the implementation and enforcement of the Modern Slavery Act 2015.

As part of the tender process, we require suppliers to complete a Corporate Responsibility 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 Company 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 Company of any changes to their responses provided as part of the tender during the lifetime of the contract.

The Company will exclude any potential bidders that appear on the World Bank Sanctions Lists or the EU Sanctions Lists from our formal tender process. Our current suppliers are audited against these lists on a regular basis and further investigations are carried out if required.

In addition, the Company communicates with our existing suppliers to monitor their compliance with the Modern Slavery Act 2015. We seek to support suppliers who have limited resources and require additional advice on implementing strategies to ensure compliance with the legislation.

To maintain our knowledge on the best methods to mitigate the risks of slavery and human trafficking within our supply chains, representatives from the Company attend relevant industry-wide events. This includes attendance at the Modern Slavery and Human Rights Summit, managed by Front Group

Ltd, where experts have been sharing their knowledge and experiences of the measures they take to ensure the absence of Modern Slavery within their own supply chains.

#### **TRAINING**

We have implemented specific training on the Modern Slavery Act within our Procurement department, with the aim of completing the training on an annual basis. The training covers all aspects of countering modern slavery including countering modern slavery across the supply chain. Completion levels are monitored to ensure the training is successfully undertaken within the necessary timescales.

We have also implemented awareness training on slavery and human trafficking in our Compliance and Governance training, which will be rolled out to RWE Generation UK and RWE Technology in 2019.

#### **SCOPE**

This statement applies to RWE Generation UK plc. (the UK Generation business) and the following subsidiary companies:

RWE Markinch Limited (06574689)

Registered office address: **Windmill Hill Business Park, Whitehill Way, Swindon, Wiltshire, SN5 6PB**

This statement is pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2018.

**Director name: S. C Glover**

**Signature:**



**Date: 3<sup>rd</sup> June 2019**

**RWE Generation UK plc (and subsidiaries)**