

## Modern Slavery Act 2015

### RWE Renewables Slavery and Human Trafficking Statement 2020

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 2020.

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

- **RWE Renewables UK Developments 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 Limited**

### Organisation’s Structure, Business and Supply Chains

#### Structure

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

RWE AG Group, a European energy company, has four business segments – Generation, Power, Supply & Trading and Renewables.

Electricity is the most important driving factor for innovation and modernisation in our time. The more digitalisation and electrification progress, the larger the demand for a secure electricity supply that is always available. At the same time, climate change urges society to significantly reduce emissions. The RWE AG Group is focused on meeting increasing power demand on the one hand and protect our climate on the other. The organisation will play an important role in achieving this goal whilst also focusing on the technologies of the future: renewables, hydrogen and storage. Supported by a globally active trading company and with a flexible fleet of conventional power plants in the German, Benelux, and British core markets that helps maintain a reliable power supply while responsibly implementing the phasing out of nuclear energy and coal.

The group wide guiding principle is clear: “Our energy for a sustainable life.” Approximately 20,000 employees in our organisation are working to this end and they have set themselves an ambitious goal: to achieve carbon neutrality by 2040.

In October 2019, RWE AG acquired the assets of E.ON Climate & Renewables, and in July 2020 the group also acquired Innogy Renewables, the renewables divisions of Innogy SE. These assets now form part of RWE’s newest business segment, RWE Renewables GmbH.

RWE Renewables GmbH, within the RWE Group, comprises of around 3,500 highly-qualified employees engaging business in more than 15 countries around the globe, and a portfolio of plants with a total capacity of more than 9 GW (pro rata based on equity share), including offshore and onshore wind power as well as photovoltaics. RWE Renewables also have a clear

focus on growth: the project pipeline is well filled. By 2022, we are committed to investing at least €5 billion net globally in the continued expansion of renewable energy.

## **Business in the UK**

RWE Renewables GmbH subsidiaries include RWE Renewables UK Limited (formerly E.ON Climate & Renewables UK Limited), and from July 2020 RWE Renewables UK Swindon Limited (formerly Innogy Renewables UK Ltd). The two UK companies, in addition to RWE Renewables Management UK Limited, now form the UK division of RWE's newest business segment, RWE Renewables UK.

RWE Renewables UK owns and operates just under 2.1 gigawatt (GW)<sup>1</sup> of renewable electricity generation plant (pro rata, based on equity share) in the UK, from onshore wind and offshore wind. We also have a development pipeline of renewable generation assets and employ around 834 staff and 194 contractors in the UK, across 44 operational sites, 4 regional offices and our headquarters based in Swindon and Coventry.

## **The Companies' approach to tackling modern slavery and human trafficking**

Throughout 2020, 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.

Prior to joining the RWE Group in July 2020, RWE Renewables UK Swindon Limited (formerly Innogy Renewables UK Ltd), adopted the same high standard human resources and procurement policies, processes and practices, based upon the former Innogy Code of Conduct\*, which also adopted the core values of the United Nations Global Compact. (\*A link to the innogy Code of Conduct is no longer published on our website since this policy is superceded by the RWE Code of Conduct policy going forward)

Throughout 2020 the Companies have adopted a wide range of internal policies, standards and processes to assist in tackling slavery and human trafficking. These have focused on:

## **Our people**

- The Companies operates 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.

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<sup>1</sup>Full or partially owned. Pro-rata figure based on equity share is just over 1GW.

- 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. For suppliers of RWE Renewables UK Swindon Limited (formerly Innogy Renewables UK Ltd), the Innogy Code of Code applied until July 2020. Both the RWE and Innogy Codes of Conduct are 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 Prequalification process, the Companies requires suppliers to complete a Corporate Sustainability 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 in some cases pre-July 2020, the Innogy Code of Conduct), and also have pre-qualification checks and questionnaires carried out on all 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 Europe.
- During 2020 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. This includes extending the use of pre-qualification checks to cover new contracts with existing suppliers and sending specific Human Rights questionnaires to our

key suppliers. We conduct supply chain risk assessments on the information received from our existing and new suppliers.

- Effectiveness in ensuring that slavery and human trafficking are not taking place in our business or supply chains, measured against appropriate performance indicators.
- 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 prequalification process we reserve the right to have access to, and to audit, our tier 1 supplier's supply chain if required.

**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, awareness training is provided to our procurement staff. This is focused on ensuring the requirements of the RWE Code of Conduct are understood and complied with. The awareness training will be extended to include specific reference to the requirements of the Modern Slavery Act 2015.
- Throughout 2020 a lot of our processes have been subject to revision and improvement. Our plans for 2021 include strengthening our training and 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 2020.

This statement was approved by the Directors of RWE Renewables UK Limited, RWE Renewables UK Swindon Limited and RWE Renewables UK Management Limited as the ultimate UK holding companies of RWE Renewables, on 26th day of April 2021.



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**Thomas Glover, Director**

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

**Date 26th April 2021**