

RWE Renewables Anti-Slavery and Human Trafficking Statement 2024

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 "RWE Companies"), pursuant to section 54(6) of the UK's Modern Slavery Act 2015 (the "Act"). The statement constitutes the RWE Companies anti-slavery and human trafficking statement for the financial year ending 31st December 2024.

This statement is also made on behalf of the following wholly owned subsidiary companies (the "RWE Subsidiary Companies"):

- **RWE Renewables UK Onshore Wind Limited**
- **RWE Renewables UK London Array Limited**
- **RWE Renewables UK Wind Services Limited**
- **RWE Renewables UK Robin Rigg East Limited**
- **RWE Renewables UK Robin Rigg West Limited**

The RWE Companies and the RWE Subsidiary Companies together being the "Companies".

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 Europe and Australia GmbH. Management and decisions are carried out in two functional organisations, in the onshore business in Europe & Australia led by RWE Renewables Europe and Australia 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 clean energy world. With its investment and growth strategy Growing Green, RWE is contributing significantly to the success of the energy transition and the decarbonisation of the energy system. Around 20,000 employees work for RWE in almost 30 countries worldwide. RWE is already one of the leading companies in the field of renewable energy. RWE is investing billions of euros in expanding its generation portfolio - in particular, in offshore and onshore wind, solar energy and batteries. It is perfectly complemented by its global energy trading. RWE is decarbonising its business in line with the 1.5-degree reduction pathway and will phase out coal by 2030. RWE will be net-zero by 2040. Fully in line with the company's purpose - Our energy for a sustainable life.

RWE Business in the UK

RWE is the leading power generator in the UK and can generate enough power for 12 million 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 one of the largest renewables generators in the UK with a diverse operational portfolio of renewables

including onshore wind, offshore wind, hydro and biomass with a combined installed capacity of over 2.79 GW (pro rata) (4.8 GW installed capacity).

RWE intends to maintain the pace of investment in developing clean energy projects in the UK to support the energy transition, creating high quality jobs across the length and breadth of the country. Our UK expertise and continued commitment to invest helps attract additional, reliable investment partners into the UK.

RWE currently directly employs over 3,100 people in the UK, plus many more indirectly, creating high quality jobs across the length and breadth of the country.

RWE Renewables policy approach to tackling modern slavery and human trafficking

Throughout 2024, 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 their 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 they are 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 General Terms and Conditions for procurement require all our suppliers to accept and comply with the principles set out in 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". Our General Terms and Conditions for procurement also contain a specific Modern Slavery clause that requires the supplier to comply with the requirements of the Modern Slavery Act 2015.

Due diligence processes in relation to slavery and human trafficking within our supply chains

The Companies continue to operate a number of measures to identify, assess and continually monitor its suppliers to ensure compliance with the Modern Slavery Act 2015. In particular:

- As part of our supplier qualification process, potential suppliers meeting certain qualification criteria need to undergo our Corporate Questionnaire which contains a question on Modern Slavery and the respective applicability. In addition, RWE introduced a risk-based methodology in 2024, which means that suppliers that are identified with a potential higher risk of human rights issues undergo additional assessments and further checks.
- The Companies exclude any potential suppliers that appear on the World Bank Sanctions Lists or the EU Sanctions Lists from their tender processes.
- In addition, all potential suppliers and/or business partners are checked against sanctions lists using an external system.
- RWE developed the Human Rights Risk Management System, which provides a framework to put the principles of the Policy Statement on RWE's Human Rights Strategy into practice see www.rwe.com. The objective of the Human Rights Risk Management System is to be the overarching framework of all the actions supporting Human Rights due diligence implementation. It aims for the prevention of potential or remediation of actual breaches in Human Rights and/or related Environmental Obligations, according to the requirements of the German Act on Corporate Due Diligence Obligations in Supply Chains (the "German Supply Chain Act" or "Lieferkettensorgfaltspflichtengesetz" or "LkSG"). Measures taken to comply with the German Supply Chain Act enhances RWE's efforts in dealing with Human Rights risks in all jurisdictions.
- All contracting suppliers are requested to comply with the RWE Code of Conduct, and Human Rights Contract Appendix. A supplier's failure to comply with these items provides the Companies with various contractual rights. In the event of a suspected violation of our policies, 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.
- The Companies conduct regular supply chain risk assessments on the information received from our existing and potential suppliers. Furthermore, suppliers are required to inform the Companies of any changes to their responses provided as part of a tender process during the lifetime of the contract.
- The Companies' existing suppliers are checked against sanction lists on a daily basis and further investigations are carried out if required.

Key Performance indicators for 2024

- 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 2015 training to relevant procurement personnel, helping them to better identify any potential human trafficking and modern slavery issues.
- In addition to the annual Modern Slavery Act 2015 training, procurement personnel received training on the requirements to ensure compliance with the German Supply Chain Act as of 2023, as well as regular training on Supplier Qualification and use of the supplier risk monitoring tool.

Our plans for 2025

The Companies will continue to regularly review and update its policies and processes to ensure that any such risks of slavery and human trafficking are appropriately identified.

With regards to training, all Procurement employees within the Companies will continue to complete Modern Slavery specific training on an annual basis. In addition, Human Rights training is also being introduced for key personnel within the Companies.

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 2024.

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 the RWE Renewables Group, on 8th April 2025.


[Thomas Glover \(20/04/25 10:18 GMT+2\)](#)

Tom Glover, Director

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

Date 8th April 2025