



Modern Slavery Act 2015

Innogy Renewables UK Limited Slavery and Human Trafficking Statement 2019

Introduction

Innogy Renewables UK Limited is committed to ensuring that neither modern slavery nor human trafficking exist anywhere within our supply chains or in any part of our business. We support the 10 principles of the United Nations Global Compact, including the protection of internationally proclaimed human rights and the elimination of all forms of forced and compulsory labour. These principles are incorporated within the innogy Code of Conduct.

This statement sets out the steps we undertook during the financial year ending 31st December 2019.

Our Organisation's Structure, Business and Supply Chains

Our structure

Innogy Renewables UK Limited is part of innogy SE, a European energy company.

innogy SE has three business segments - Grid & Infrastructure, Retail and Renewables. The key markets for the company are Germany, the United Kingdom, the Netherlands, Belgium and several countries in Central Eastern and South Eastern Europe, including the Czech Republic, Hungary and Poland.

In respect of renewable power generation, the company is also active in other regions, including North America and Australia. The company has over 43,000 employees, while the Renewables segment of innogy SE employs over 1000 staff who develop, build and operate renewable generation plant; primarily wind and hydro power.

On 18th September 2019, E.ON AG acquired the majority shareholding in innogy SE, from RWE AG. This did not impact the operation of the Renewables segment and its commitments or practices regarding the abolishing of modern slavery.

Our Business

Innogy Renewables UK Limited operates around 2 gigawatt (GW) of renewable electricity generation plant, from technologies including onshore wind, offshore wind and hydroelectricity. We also have a development pipeline of renewable generation assets, including some sites in construction

We employ around 540 staff and 140 contractors in the UK, across eight regional offices and our headquarters in Swindon

The Company's Human Resources policies, processes and practices; for recruitment, for employees, agency workers and fixed term contractors, comply with and adopt the core values of the Innogy Code of Conduct. This Code of Conduct applies across the entire innogy SE group, and adopts the core values of the United Nations Global Compact, including the elimination of all forms of forced and compulsory labour, and the effective abolition of child labour.



Our key HR policies reflect the requirements of the Modern Slavery Act 2015, and include but are not limited to:

- **Recruitment and Selection/Agency Workers/Fixed Term Contract/Contractor Principles Policy** - The Company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it appoints, before accepting workers from that agency. This is in line with our Supply Chain Compliance Programme.
- **Grievance / Bullying and Harassment** - These policies are designed to enable employees to raise and resolve personal concerns that affect them, including those relating to slavery or human trafficking.
- **Disciplinary Procedure** - The Company Disciplinary Procedure provides a mechanism for dealing with any matters of misconduct or breaches of the innogy Code of Conduct which relate to slavery or human trafficking.
- **'Speak Up' Policy** – Introduced in 2017, this policy encourages all workers to report any concerns relating to the direct activities of the Company or its supply chains. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's 'Speak Up' Policy is designed to make it easy for workers to make disclosures without fear of retaliation. Employees or others who have concerns can use a confidential helpline and email, which is operated by an external provider.

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 our areas of influence.

Our Procurement Terms and Conditions require all our suppliers to comply with the innogy Code of Conduct. The Code of Conduct is consistent with the "Labour standards" set out in the United Nations Global Compact. It requires all of our suppliers both through their own activities and those within their own supply chains, to ensure 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.

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 they previously been involved in slavery or human trafficking.

We require all suppliers and contractors to comply with the innogy Code of Conduct, and we also have pre-qualification checks and questionnaires carried out on all new suppliers. This requires suppliers to provide formal confirmation that there is no modern slavery taking place within their business or within



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their own supply chains. This applies to all suppliers, including those suppliers operating outside of Europe.

During 2020, we will continue 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 Schedule. 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

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 innogy Code of Conduct are understood and complied with. This is being extended to include specific reference to the requirements of the Modern Slavery Act 2015.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes Innogy Renewables UK Limited's slavery and human trafficking statement for the financial year ending 31st December 2019.

This statement was approved by the Directors of Innogy Renewables UK Limited on 13th February 2020.

Richard Sandford, Director

Date: 13th February 2020