

## **Modern Slavery Act 2015**

### **RWE Supply & Trading Participations Limited**

#### **Modern Slavery and Human Trafficking Statement**

**2019**

This statement has been published in accordance with section 54 of the Modern Slavery Act 2015. It outlines the measures that we have taken at RWE Supply & Trading Participations Limited (the “**Company**”) to ensure that no slavery or human trafficking is present in our business or supply chains.

#### **Introduction**

We are committed to ensuring that neither we, nor any constituent part of our supply chain, are involved in slavery, servitude, forced labour or human trafficking.

#### **Our Business and Organisational Structure**

The Company is a subsidiary of RWE Supply & Trading GmbH (“**RWEST**”), a leading European energy trading house headquartered in Essen, Germany. The Company and RWEST are members of the RWE Group, headed by RWE AG, which ranks among the biggest electricity and gas utilities in Europe with around 20,000 employees across 19 countries.

The principal activity of the Company is in the trading of liquid natural gas (LNG) in different markets both in the UK and overseas. The Company also trades other commodities such as natural gas.

The Company has no employees. Its human resources are provided by RWEST which itself has issued its own slavery and human trafficking statement for the financial year 2019.

#### **Our Policies and Processes**

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner.

The RWE Group has been a member of the United Nations Global Compact since 2004, and we, like all other members of the RWE Group, are committed to recognising and supporting its ten principles in our area of influence, including the elimination of all forms of forced and compulsory labour and the effective abolition of child labour. The ten principles are enshrined in the RWE Group's Code of Conduct, as are the core labour standards set out by the International Labour Organisation.

The RWE Group Code of Conduct sets out our expectations of how we work, the standards for collaborating with contractual partners and the common basis on which to build contractual relationships. All RWEST employees who provide services to the Company are issued with the Code of Conduct as part of their induction and the Code of Conduct is also published both on the RWE website and on the corporate intranet.

We have additional measures in place in high risk areas of our business, for example the review of all potential trading partners for energy commodities before we enter into any business relationships with them. As part of our Counterparty Risk Assessment, we undertake a risk-based due diligence process to check international databases and information systems as well as conducting more generalised internet searches to see whether any misconduct is known in relation to the ten principles of the UN Global Compact and the Code of Conduct.

## **Training**

All of RWEST's employees who provide services to the Company are required to complete a regular compliance training, which takes into account recent regulatory developments. The training ensures that such employees are aware that they are able to raise concerns about how colleagues are being treated, or about practices within our business or supply chains, without fear of reprisals.

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 2019.



**Jan Sporing**  
**Director**

**RWE Supply & Trading Participations Limited**