



RWE Supply & Trading GmbH Modern Slavery and Human Trafficking Statement 2024

Introduction

RWE Supply & Trading GmbH is committed to ensuring that neither our direct business activities nor any constituent part of our supply chain, are involved in slavery, servitude, forced labour or human trafficking. We recognise that, as a market-leading multinational company, it is incumbent upon us to take steps to combat this growing global issue.

This slavery and human trafficking statement outlines the measures that we have taken to ensure that no slavery or human trafficking is present in our business or supply chains.

Business Structure and Supply Chains

We are a leading European energy and commodity trading house headquartered in Essen, Germany, with a significant presence in the UK, and associated offices worldwide, including in Australia, the Czech Republic, China, India, Indonesia, Japan, Singapore, the Netherlands and the USA.

We are part of the RWE Group, headed by RWE Aktiengesellschaft (RWE AG), which ranks among the biggest electricity and gas utilities in Europe with around 20,000 employees.

We act as the interface between the RWE Group's operating companies and global wholesale markets for energy and energy-related raw materials in both physical and/or derivative forms. We are responsible for the economic optimisation of power generation and the entire non-regulated gas business of the RWE Group.

Our supply chains vary greatly in terms of size, complexity and location, reflecting the diverse nature of our business. As a result, the risk of modern slavery and/or human trafficking in our supply chains varies from low (such as in our derivatives trading activities) to high (in the purchase of combustion fuels, for example).

Policies and Procedures

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, supporting and putting into practice 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 Code of Conduct, as are the core labour standards set out by the International Labour Organisation.

The RWE 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 employees are provided with the details of a link to the RWE Code of Conduct as part of their induction and asked to confirm they have read and understood the content. The RWE Code of Conduct is also published both on the RWE website and on the corporate intranet.

We expect our business partners to accept the principles set out in the RWE Code of Conduct which also states that any violation of those principles will result in a re-examination of the business relationship, with us taking any appropriate measures that we deem necessary.

Our standard recruitment agency terms specifically require suppliers to comply with the Modern Slavery Act 2015, including obliging suppliers to implement appropriate controls to prevent modern slavery, and to

notify us if they become aware of any modern slavery within their supply chains. The terms permit us to terminate the contractual relationship with a supplier immediately upon becoming aware of any breach of the Modern Slavery Act 2015.

Due Diligence Processes

We have additional measures in place in high-risk areas of our business, for example:

- All potential trading partners for energy commodities are reviewed by us 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 our Code of Conduct.
- As a trader and consumer of coal, RWE is one of the founding members of the Bettercoal initiative, which exists to promote the continuous improvement of corporate responsibility in the coal supply chain. As a member of Bettercoal, the RWE Group undertakes certain obligations, including the implementation of the Bettercoal Code in our coal supply chain. The Bettercoal Code provides that coal mining companies *“will not participate in, or benefit from, any form of Forced Labour, including bonded labour, forced prison labour, slavery, servitude, work performed under the menace of a penalty, or Human Trafficking”*, with the terms “Forced Labour” and “Human Trafficking” being broadly defined. The Bettercoal Code forms the basis for assessments (using self-assessment questionnaires and independent third-party site assessments) of coal mining sites. We take into account the results of such assessments in purchasing decisions and due diligence processes.
- In our physical freight trading business, we seek to ensure that all vessels chartered by us are manned and controlled in accordance with the recommendations of the International Transport Workers Federation, and that all officers and crew are employed on terms and conditions which are no less favourable than those prescribed by the Maritime Labour Convention.

In 2024:

- Our Human Rights Officer as part of a group-wide Human Rights Team, consisting of six Human Rights Officers representing the main operating companies within the RWE Group and a Chief Human Rights Officer at RWE AG, met quarterly to discuss the status of human rights matters and the development of relevant policies and processes within the RWE Group.
- We utilised RepRisk, an environmental, social and governance (ESG) risk rating platform to support our Human Rights Risk Management System and annual human rights risk analysis.
- We onboarded SigWatch, a provider of unique, high-quality data and monitoring services, to give us early and clear insights into how global activist campaigns are shaping the present and future of our organisation.

Training

All of our employees are required to complete regular compliance training, which takes into account recent regulatory developments. The training ensures that employees are aware that they can raise concerns about how colleagues are being treated, or about practices within our business or supply chains, without fear of reprisals.


In 2024 we held a bespoke training session for our Asia-Pacific colleagues, which covered our obligation to address human rights risks within our supply chains, the suggested ways to harness collaboration and the appropriate processes to follow to aid us in achieving our objectives.

Plans for 2025

We will roll out bespoke web-based Human Rights training. It will be available for all employees on our internal learning portal and mandatory for a select number of employees to whom it is relevant.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st December 2024.

Signed:



Peter Krembel

Chief Executive Officer

Date:



Gunhild Grieve

Chief Financial Officer

RWE Supply & Trading GmbH