

RWE GROUP MODERN SLAVERY STATEMENT 2021

The RWE Group 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 Australia Pty Ltd** (“**RWE Australia**”, the submitting entity), pursuant to the Modern Slavery Act 2018 (the **Act**), on behalf of:

- **RWE Renewables Operations Australia Pty Ltd** (formerly, **Belectric Australia Pty Ltd**) a company registered in Australia with the ACN 157 953 654, and registered address at Level 24, 477 Collins Street, Melbourne, VIC, 3000 (**Belectric Australia**); and
- **Belectric GmbH** a company registered in Germany with the company number HRB 5161 and registered address at Wadenbrunner Straße 10, 97509 Kollitzheim, Germany (**Belectric Germany**),

(each a reporting entity, and together the “**Companies**”) within the same group (the “**RWE Group**”).¹ The statement constitutes the Companies’ modern slavery for the financial year ending 31st December 2020.

Organisation’s Structure, Business and Supply Chains (criteria 1 and 2)

Structure

The Companies and the submitting entity are wholly-owned subsidiaries of RWE Renewables GmbH, which is in turn wholly-owned by RWE AG.

RWE AG, 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 renewable assets of E.ON SE, and in July 2020 the group also acquired the renewables assets of Innogy SE, which included Limondale Sun Farm Pty Ltd (“**Limondale Sun Farm**”), RWE Australia, Belectric Australia and Belectric Germany (and related entities). These assets now form part of RWE AG’s newest business segment, RWE Renewables.

RWE Renewables, within the RWE Group, comprises 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 has a clear focus on growth: the project

¹ Note that RWE Australia is not a reporting entity pursuant to the Act.

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

See further detail of the structure of the RWE Group in the Annex .

Business in Australia

Belectric Australia's principal activity during 2020 was the performance of the Engineering, Procurement and Construction (EPC) contract to Limondale Sun Farm. Belectric Australia also began initial Operation and Maintenance (O&M) work under the EPC contract, of Limondale Sun Farm in preparation of the O&M contract to begin in 2021. Belectric Australia employs around 15 people based between the project site in New South Wales, and head office based in Melbourne.

Belectric Germany's main business is designing, planning and construction of solar photovoltaic power plants and the operations and maintenance of such plants and research and development related to photovoltaic technology. Belectric Germany's principal activity in Australia in 2020 was the project support and supply of components for Belectric Australia's activity of Engineering Procurement and Construction of Limondale Sun Farm.

Belectric Germany's activities in Australia amount to carrying on business as it is expected that it has had permanent establishment during the reporting period, and it is on this basis that it reports against the Modern Slavery Act.

Modern slavery risks (criterion 3)

The RWE Group has identified the following modern slavery risks—

Possible risks within operations like ours

- The Companies may engage with third parties for the provision of services, who in turn may sub-contract out aspects of the service delivery to other organisations. In these situations, the Companies would have less visibility over the practices employed through these contracting relationships.
- O&M services like those provided by the Companies are considered relatively high risk due to factors including remote work locations, manual labour, and on demand work.

Possible risks within supply chains like ours

- While the Companies do not carry out procurement from high risk countries itself, it acknowledges that suppliers may be operating in high risk countries, creating a supply chain risk.
- Industry and sector risks in relation to the procurement of raw materials for battery and solar projects, as it is considered a high risk industry for modern slavery.

The Companies' approach to tackling modern slavery (criteria 4 - 6)

A group-wide approach

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 (including the Companies and the reporting entity), 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 (for the remainder of reporting year 2020), the Companies 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 superseded by the RWE Code of Conduct policy going forward; a copy can be provided on request)

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 operate 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.
- 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.
- The RWE Group have a dedicated compliance team who work with legal and procurement experts to support the implementation and enforcement of the Act.
- To ensure a high level of understanding of the risks of modern slavery 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 Act.
- 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 more robust.

Our supply chains

- We are committed to ensuring that there is no 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 the Companies, 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 Act.

- As part of our procurement prequalification process, the Companies require suppliers to complete a Corporate Sustainability questionnaire, which is aligned to the Act. 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 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 include requirements which are consistent with the standards in the Act.

Due diligence processes

We take appropriate steps to verify that potential suppliers are not currently, nor have been previously involved in slavery.

- 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 Australia.
- During 2020 we continued to identify and implement ways of strengthening our due diligence policies and procedures in relation to slavery 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 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.

This statement is made pursuant to Sections 14 of the Modern Slavery Act 2018 (Cth) and constitutes the Companies' slavery statement for the financial year ending 31st December 2020.

In accordance with Section 13(2) of the Act, this statement was approved to be signed by Caitlin Campbell of **RWE Renewables Australia Pty Ltd** on behalf of **RWE Renewables Operations Australia Pty Ltd** and **Belectric GmbH** by circular resolution of their respective boards (being principal governing bodies) on 28th day of June 2021 (the **Approvals**).



Caitlin Campbell – Director RWE Renewables Australia Pty Ltd

For and on behalf of:

RWE Renewables Operations Australia Pty Ltd
Belectric GmbH

Date 30 June 2021

ANNEX: RWE GROUP STRUCTURE

RWE Group structure
(as at 31 December 2020)

