



# ENGIE UK Modern Slavery Statement 2023

For the financial year ending 31 December 2023

## Our Commitment

The Modern Slavery Act 2015 requires certain businesses to set out the steps they have taken and are taking to ensure slavery is not taking place in their operations and supply chain. We, ENGIE UK (as part of the ENGIE Group), are fully committed to playing our part in eradicating modern slavery.

In line with this commitment, this statement is being made by ENGIE UK Holdings Limited on behalf of itself, its subsidiaries and those ENGIE Group entities operating the business activities set out in this Statement and established in the UK.

## What is Modern Slavery

Modern slavery is an international crime that affects an estimated 40 million people around the world. It includes victims trafficked from overseas and vulnerable people in the UK who are forced to work against their will or are exploited. This disturbing issue transcends age, gender and ethnicity.

## ENGIE UK

ENGIE UK, which is part of the global ENGIE group, operates in a variety of sectors across the energy industry in the UK, including; BtB energy supply, hydroelectric pumped storage power generation, energy trading business, gas storage and onshore renewable assets operation, and has around 680 employees, with circa 700 suppliers/sub-contractors.

## Our UK business activity

Within the UK, ENGIE is comprised of a number of different companies which are organised into distinct operating divisions of the ENGIE Group.

We are committed to accelerating the transition to a carbon-neutral world, through increasing investment in a portfolio of both flexible and responsive low carbon assets, and enabling our customers and stakeholders to embrace a greener and more efficient world.

We are proud to be a key low carbon power producer and storage operator in the UK with interests in over 2GW of generation including the UK's foremost pumped storage business (First Hydro) and several onshore wind farms and a solar park.

ENGIE also has BtB energy retail business, and a trading business which trades UK power and UK gas to manage the commodity price exposures associated with its generation assets and retail market position, as well as providing risk management services for our customers.

In addition, through its subsidiary Storengy UK, ENGIE developed and now operates the Stublach Natural Gas Storage site in Cheshire, the largest such facility in the UK. In addition, ENGIE acquired Ixora AD energy generation business in 2023.

To ensure our organisation remains efficient, that our processes are consistent and that standards are both set and maintained, there are a number of corporate functions based in our various UK offices. These functions exist to ensure that risks are mitigated and that there is strong internal compliance/control. The corporate functions include IT, Legal & Ethics, Procurement, Health & Safety, HR, Finance and Corporate Responsibility and are supported by our Shared Services Centres in Newcastle.

## Our Risk Assessment

We have assessed our business for the potential for the risk of modern slavery and concluded that the two main areas where modern slavery could, theoretically, occur is within our own workforce and in the workforce of our supply chain.

However, we consider that we have adopted robust employment practices for recruitment and management of our own staff and we manage any temporary workers engaged by us through a small number of specialist providers in respect of which we have undertaken due diligence as described below in more detail. Accordingly, we believe that the risk of modern slavery is more likely within our supply chain than within our own workforce.

## Our Supply Chain

Our supply chain involves more than 700 suppliers and subcontractors. The majority of our supply chain is based in the UK. In line with the nature of our business endeavours, the competencies of our supply chain and the industries in which they operate vary greatly. For example, our supply chain and subcontractors provide engineering, equipment installation and maintenance, cleaning services, construction work (including civils, plumbing, electrical work etc.), grounds maintenance services, IT software, the supply of general building materials and plant hire.

We assess risk in our supply chain based on physical, business and volume related risks. On that basis, we review our supply chain to identify areas where potential modern slavery risks may arise.

Having assessed our supply chain for the potential for the risk of modern slavery, we have identified a number of categories of services provided to us by our supply chain where we consider that there is a higher risk of modern slavery or human trafficking occurring. We have focussed our attention on these areas which are:

- Cleaning contractors
- Catering services
- Manned guarding
- Construction workers (low and unskilled)
- Contingency and agency workers
- Waste management
- Pest control
- Grounds maintenance

## Our Policies & Practices in Relation to Modern Slavery

Our group's Ethics Charter and Practical Guide to Ethics set out expected behaviours in relation to ethical requirements for all employees. The Charter requires every employee to take seriously their role in building and protecting our reputation, by acting in full compliance with the applicable laws and our values and ethical principles, in all our activities.

Our ethical principles are:

1. Act in accordance with laws and regulations
2. Behave honestly and promote a culture of integrity
3. Be loyal
4. Respect others

In February 2020, ENGIE published a Modern Slavery Policy which sets out the commitments which we have made in relation to modern slavery. Within the Policy we have specifically outlined the roles which we expect our staff, leadership team and suppliers to take in supporting our commitment to eradicate modern slavery in all of its forms.

ENGIE UK has for itself and its subsidiaries, a commitment to operate to the highest economic, social and environmental standards.

Alongside the Ethics Charter and Practical Guide, Modern Slavery Policy and the Responsible Business Charter, we have in place a set of policies, processes and procedures which seek to ensure that slavery and human trafficking is not taking place in our supply chain or our operations. These include:

- ENGIE Group's Purchasing Policy.
- ENGIE Group's human rights policy (which is based on the UN Guiding Principles on Business and Human Rights).
- ENGIE's Responsible Procurement Policy and Supplier Charter. These documents outline our expectations of our supply chain and our approach to a range of issues including modern slavery and ethical conduct of our supply chain.
- adoption of the Prompt Payment code.
- our Business Principles Policy detailing our approach to procurement
- undertaking due diligence on our supply chain as described below.
- entering into contractual commitments with our supply chain as described below.
- providing our suppliers with access to a specific whistleblowing hotline.

We assess instances of non-compliance, of which we become aware, taking appropriate remedial action as expeditiously as possible.

We are committed to ceasing trading with suppliers showing persistent disregard for important elements of environmental, social and ethical performance.

## Our Due Diligence Process

### **In our own operations**

We use the ENGIE Group compliance tool. The business has a reporting system that enables acts of potential unethical or non-compliant behaviour, which would include modern slavery or human trafficking, to be reported for escalation. This reporting system comprises a clear mechanism for reporting of any issues and the whistle-blower may remain anonymous if they so wish. Any matters raised are assessed through a formal investigation procedure.

Our people are subject to various appropriate pre-screening checks during recruitment. This includes right to work checks pre-employment and throughout employment for those individuals whose right to work is not permanent.

Our contractual relationship with these suppliers of temporary labour also requires them to undertake robust onboarding checks before an individual will be engaged.

Our risk assessment has determined that our workers present a lower risk of modern slavery and, so while these workers will only be sourced through agencies who have agreed to our

preferred supplier contractual terms, there is no requirement for those suppliers to undertake a biannual audit on those workers.

### ***In our supply chain***

Prior to their engagement, new suppliers are required to complete our supplier questionnaire and/or adhere to modern slavery contractual requirements. Responses to the supplier questionnaire are subject to a desktop audit which is conducted jointly by staff from our Procurement, Finance and Health and Safety teams. During the onboarding process, these suppliers are required to confirm that they can, and will, adhere to the commitments presented in the ENGIE Ethics Charter.

We have the ability to undertake enhanced due diligence investigations on our top suppliers prior to awarding high value refurbishment contracts.

In addition to the above due diligence measures, in some of our business sectors when suppliers who have not been used within the past 18 months, they are subject to desktop audits or removed from our active supplier list.

Suppliers are contractually required to implement due diligence on their own suppliers and subcontractors to ensure that slavery or human trafficking does not exist within in their supply chain. Suppliers are also required to notify us if they discover any actual or suspected slavery or human trafficking within their supply chain.

## **Our Training**

Our staff are all required to undertake mandatory ethics training, which includes a bespoke module entitled "Human Rights at ENGIE" for those roles most likely to be potentially exposed to Modern Slavery breaches.

All employees are bound, by virtue of their terms of employment, and by our policies, charters and codes of conduct including our Ethics charter.

## **Measurement of our Progress**

We have developed a programme to measure our performance, which includes:

- completion of modern slavery training by employees.
- undertake due diligence investigations in some of our business sectors on top 50 suppliers every 18 months.
- conducting desk-top audits on suppliers on our preferred supplier list.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for ENGIE UK Holdings Limited (on behalf of itself and its subsidiaries) for the financial year ending 31 December 2023.

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Miya Paolucci  
Country Manager, ENGIE UK

Date: 31<sup>st</sup> December 2023