



ENGIE UK & Ireland

Modern Slavery Statement



Our Commitment

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

In line with this commitment, this statement is being made by ENGIE Services Holding UK Limited on behalf of itself and its subsidiaries and by International Power Ltd. and its subsidiaries operating 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 in Numbers



£3.6BN
TURNOVER



102,000
ENERGY SUPPLY CUSTOMERS (HOMES & BUSINESSES)



No. 1
IN REGENERATION SERVICES



2.2GW
OF LOW CARBON ENERGY GENERATION



14,000+
EMPLOYEES



1,700
SUPPLIERS/SUB-CONTRACTORS



170
PARTNERSHIPS WITH COUNCILS



TOP 10
LINKEDIN COMPANY TO WORK FOR IN THE UK

ENGIE UK

We are an Energy, Services and Regeneration business. We have a bold Purpose at ENGIE
“to improve lives through better living and working environments”

which underpins all that we do and helps our customers and employees balance performance with responsibility; enabling progress in a harmonious way.

We comprise a number of different ENGIE companies, which we have organised into three distinct operating divisions:

For Business

We are a leading provider of energy and services to thousands of UK businesses. Our extensive capabilities are designed to serve both public and private organisations, from SMEs to large blue chip companies and from industrial environments to corporate locations, along with some of the country’s most iconic buildings.

We work in partnership with our business customers, helping them to optimise the efficiency of their buildings and operational processes. By integrating energy supply, efficiency, facilities management and business support services, we can provide customers with guaranteed savings, combined with improved efficiency and sustainability.

For Places

We are committed to improving and regenerating the environment we live in. We work as a strategic partner to provide bespoke, outcome-based solutions that address each town, city or region’s most pressing needs. From local authorities, housing associations, healthcare and education institutions to transport, we help customers to develop sustainably for the future.

We enable communities across the UK to realise their full potential through place making and place shaping. Not only do we create these communities, but we also have the expertise to maintain and support them - ensuring that sustainable initiatives deliver a lifelong impact.

For Energy Infrastructure

We are proud to be a key low carbon power producer in the UK with interests in over 2 GW of generation including the UK’s foremost pumped storage facility (First Hydro) and a well-established renewables development business (onshore/offshore wind and solar).

We operate multi customer sites with large-scale embedded generation with the ability to export to the grid. We also have a pipeline of renewable projects in development.

As well as our Divisions, 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 at our UK Head Office in Canary Wharf, London. 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, Environment, HR, Finance and Corporate Responsibility and are supported by our Shared Services Centre in Newcastle.

Our Supply Chain

Our supply chain involves a significant number of suppliers and subcontractors. The majority of our supply chain is based in the UK or Republic of Ireland. In line with the diverse 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 equipment installation and maintenance, cleaning services, security services (including manned guarding), construction work (including civils, plumbing, electrical work, bricklaying, carpentry 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 the areas of our supply chain to identify areas where potential modern slavery risks may arise.

The areas identified within our supply chain, where we are initially focusing our attention in relation to the potential issue of modern slavery, are:



- **Cleaning**
- **Manned guarding**
- **Construction workers**
- **Contingency and agency workers (including our sub-contractors where appropriate)**
- **Waste management**
- **Pest control**



In May 2017, ENGIE Regeneration Limited together with its subsidiaries (“Regeneration Business”) was purchased by ENGIE UK. While this statement covers the Regeneration Business, there are some actions in the remainder of ENGIE UK which have not yet been taken in the Regeneration Business.

The Regeneration Business has been focused on addressing modern slavery issues in its key supplier partners who account for over 80% of its expenditure on materials and plant hire. In 2019, the Regeneration Business will be looking at the smaller suppliers of construction workers.

Our Policies & Practices in Relation to Modern Slavery

ENGIE group's **Ethics Charter** and **Practical Guide to Ethics** sets 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. ENGIE Services Holdings UK Limited has also adopted, for itself and its subsidiaries, a Responsible Business Charter (monitored by an independent Scrutiny Board) as a commitment to operate to the highest economic, social and environmental standards.

Alongside the **Ethics Charter**, guidelines and **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 Services Limited is a signatory to the Prompt Payment code.**
- **Having a Code of Conduct (December 2016) in Supplier Relations which includes the principles we follow when dealing with suppliers.**
- **Encouraging our suppliers to share in the 10 principles of the Global Compact in the field of human rights, labour law, the environment and anti-corruption through the Supplier Charter.**
- **Including specific clauses requiring compliance with the Modern Slavery Act 2015 within our standard agreement with suppliers.**
- **Outlining in our Responsible Procurement Policy and Supplier Charter our expectations of our supply chain and our approach to a range of issues including modern slavery and ethical conduct of our supply chain. Setting out in our UK Procurement 2021 Strategy responsible procurement as one of the seven enablers for the business.**
- **Basing our supplier selection on objective and transparent criteria that include a consideration of environmental, social and ethical performance.**
- **Using a self-assessment questionnaire for key suppliers; this includes questions on Modern Slavery and Human Trafficking. This is a focus for 2019.**
- **Including an Ethics hotline number within the Supplier Charter for suppliers to be able to report any issues/grievances.**

Non-Compliance

We assess instances of non-compliance, of which we become aware, taking appropriate remedial action in a timely manner and 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 and Risk Assessment Process

In our own operations

We have developed an internal “Ethics and Compliance” reporting system. This reporting system provides a place where acts of potential unethical or non-compliant behaviour, which would include modern slavery or human trafficking, can be reported for escalation. This reporting system comprises a clear mechanism for reporting of any issues to an ethics mailbox or ethics hotline.

Any matters raised are assessed through a formal investigation procedure and considered by a committee of the ENGIE UK Board.

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

We have worked to consolidate the agencies we work with and these agencies are subject to the same procurement due diligence process. Where we seek temporary labour this is usually sourced via a managed service partner.

In our Supply Chain

Our suppliers are required to notify us of any breach or potential breach of the Modern Slavery Act 2015. Our agreements with our suppliers also contain requirements for them to implement due diligence for their own suppliers and subcontractors to ensure there is no slavery or human trafficking in their supply chain.

In 2017 we launched a new self-assessment questionnaire which includes questions on modern slavery, human trafficking and ethics within our supply chain. An audit process is also in place to check on compliance with critical items in the questionnaire.

We have re-defined and launched our Supplier Relationship Management Programme with critical suppliers. The process helps us to work with suppliers on where improvements can be made to their environmental, social and ethical performance. Our Supplier Engagement Survey issued in 2018 helps us to measure our engagement with our suppliers as part of our continuous improvement strategy.

We are working to introduce the above steps into the Regeneration Business. In the meantime, Regeneration Business subcontractors are required to complete a declaration confirming their compliance with the Modern Slavery Act 2015.

Training our Employees and Suppliers

In 2018 the Supply Chain Sustainability School carried out a Modern Slavery supplier day with 30 of our suppliers in attendance. Those invited were from the categories on which we have initially decided to focus our attention, as set out earlier in this statement.

We also hosted a Modern Slavery Act training workshop delivered by Supply Chain Sustainability School for the procurement team (excluding the Regeneration Business) and representatives from some of our suppliers.

Our staff and managers were all issued with mandatory ethics training in 2018. Procurement focused ethics training was also delivered to our procurement team (excluding the Regeneration Business).

All new management starters and starters working in procurement agree to comply with the ENGIE Codes of Conduct governing our business ethics and our policies and standards and in 2019 this will be rolled out to all new starters.

Measurement of our Progress

We have developed a set of key performance indicators (KPIs) to report our performance which includes:

- **Training employees on ethics including modern slavery.**
- **Incoming employees having been provided with a copy of the Charter and guidelines.**
- **Critical suppliers being mandated to complete the Supply Chain Sustainability Chain School Modern Slavery Training modules.**

Implementing our Action Plan

In 2019 our cross functional modern slavery working group will be reviewing our approach and action plan to ensure our business and supply chain are slavery free. The working group consists of representatives from various departments including Human Resources, Procurement, Corporate Responsibility and Legal.

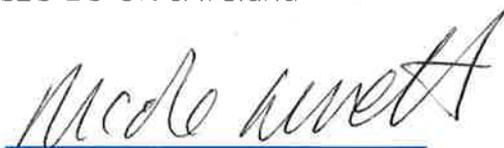
In 2019 we will also be:

- **Working to align policies and processes in the Regeneration Business fully with the approach of the wider ENGIE UK business.**
- **Rolling out 'Human Rights' e-learning to all staff.**
- **Engaging with employees to raise awareness of Modern Slavery, including targeted training with operational and human resources managers, providing e-learning training and a poster educational campaign targeting on-site personnel with no online access.**
- **Focusing on how we target our smaller suppliers and sub-contractors where we consider these may be higher risk.**
- **Launching a supplier portal to better communicate with our suppliers.**

This statement, which was approved by the Board of Directors of ENGIE Services Holding UK Limited and International Power Ltd. on 26th June 2019, 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 31 December 2018.

Nicola Lovett:
CEO BU UK & Ireland

Date:





www.engie.co.uk

