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 Holdings UK Limited on behalf of itself and its subsidiaries and by International Power Limited 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**

<table>
<thead>
<tr>
<th>Category</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>£3bn + of turnover in 2019</td>
<td></td>
</tr>
<tr>
<td>2 GW of low carbon energy generation</td>
<td></td>
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<tr>
<td>170 partnerships with councils</td>
<td></td>
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<tr>
<td>10,000 + suppliers/sub-contractors</td>
<td></td>
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<tr>
<td>No.1 in regeneration services</td>
<td></td>
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<tr>
<td>15,000 + employees</td>
<td></td>
</tr>
<tr>
<td>8,000 + energy supply customers</td>
<td></td>
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<tr>
<td>Top 10 LinkedIn Company to work for in the UK 2019</td>
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</table>
ENGIE UK is a leading energy and services company focused on three key activities: production and supply of energy, services and regeneration. We comprise a number of different ENGIE companies, which we have organised into distinct operating divisions. ENGIE UK is part of the wider global ENGIE group.

Our 15,000 employees combine these capabilities to help accelerate the transition towards a lower carbon and more efficient world - reconciling economic performance with a positive impact on people and the planet.

Our purpose is to make zero carbon happen for businesses and local authorities.
Our UK Business activities

Solutions for Businesses
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.

Solutions for Places
We are committed to improving and regenerating the environment in which we live. 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.

Solutions for UK 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 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.

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 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 10,000 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 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 Due Diligence 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 and the whistle-blower may remain anonymous if they so wish. 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 during recruitment. This includes right to work checks pre-employment and throughout employment for those individuals whose right to work is not permanent.

We ensure that the majority of temporary labour (other than some office-based workers) is sourced through our Managed Service Provision Programme. This programme enables us to engage workers through two main suppliers of temporary labour and our contracts with these suppliers require them to adhere to the highest ethical standards. Specifically, we require our suppliers to produce an annual slavery and human trafficking report, which sets out the measures they have taken to ensure that slavery and human trafficking is not taking place within their business or supply chains.

Our contractual relationship with these suppliers of temporary labour also requires them to undertake robust onboarding checks before an individual will be engaged by ENGIE. Furthermore, these suppliers are required to conduct a further audit of a pre-determined number of workers biannually, during which they further validate the worker’s right to work and confirm that the worker’s remuneration is paid into a bank account in the worker’s name.

In addition to workers engaged through our Managed Service Provision Programme, on occasion we may source temporary office-based workers through other specialist suppliers. Our risk assessment has determined that these workers present a lower risk of modern slavery, and so whilst 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.
Our Due Diligence Process

In our supply chain

Prior to their engagement by ENGIE, we require all suppliers (save for sub-contractors and smaller suppliers within our regeneration business within our Places & Communities (P&C) division) to complete our supplier questionnaire. This requires the supplier to provide information regarding the risk assessment and due diligence measures they have implemented to mitigate the risk from modern slavery within their organisation and supply chain. Responses to the supplier questionnaire are subject to a desktop audit which is conducted jointly by staff from our Procurement, Finance, Health and Safety and Environment teams. During the onboarding process, these suppliers are required to confirm that they can, and will, adhere to the commitments presented within our Supplier Charter. These commitments ensure that our suppliers support us in achieving our ethical ambitions which includes adherence to the highest standards in the fields of ethics (including modern slavery), health and safety and the environment.

We have undertaken enhanced due diligence investigations on our top (by value) 50 suppliers and, during 2019, enhanced due diligence was also undertaken on all suppliers of manned guarding and security services to our main facilities management (FM) services provider, ENGIE Services Limited (ESL).

In addition to the above due diligence measures, there are in excess of 200 suppliers on our preferred supplier list for FM services, who are subject to annual desktop audits, which are conducted by our procurement support team.

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 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.

Sub-contractors within our regeneration business within our P&C division complete an annual self-declaration confirming that they and their staff have not been convicted of any offence (including modern slavery) and there are not aware of any ongoing criminal investigation (including modern slavery).
Training our Employees and Suppliers

Suppliers
We have published an online training module which is available for all suppliers via our supplier portal. We have also held some workshops with these suppliers in relation to combatting slavery and human trafficking.

Employees
Our staff are all required to undertake mandatory training regarding modern slavery. This training includes a bespoke module entitled “Human rights at ENGIE”.

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

We have published a ‘modern slavery – know the signs’ poster designed to raise awareness of the signs of modern slavery.

Measurement of our Progress

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

- Completion of modern slavery training by employees.
- Undertaking due diligence investigations on the top 50 suppliers to ENGIE UK.
- Conducting desk-top audits on suppliers on ESL’s preferred supplier list.
Our Future Plan

In 2020 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 2020 we will be particularly focusing on how we target our smaller suppliers and sub-contractors which supply services we have categorised as higher risk services.

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 Services Holdings UK Limited (on behalf of itself and its subsidiaries) and by International Power Limited (on behalf of itself and its subsidiaries operating and established in the UK) for the financial year ending 31 December 2019.

Nicola Lovett
CEO UK & Ireland

29/06/2020

Date