

Introduction

EDF is one of the UK's largest energy companies and the largest producer of low-carbon electricity, producing around one-fifth of the nation's electricity from its nuclear power stations, renewables, coal and gas power stations and combined heat and power plants. At Government request, our coal power station stands ready to provide vital energy security to the United Kingdom should it be called upon to meet energy demand throughout the winter of 2022/2023.

This statement is made by and on behalf of EDF Energy Limited, its parent company, EDF Energy Holdings Limited, and its subsidiaries, which make up the EDF in the UK as a whole (together, in this statement, referred to as EDF). Those subsidiaries of EDF Energy Holdings Limited that are required to make their own statement under the Modern Slavery Act 2015, together with both NNB GenCo (HPC) Limited and NNB Holding Company (SZC) Limited, have adopted this statement.

EDF has a focus on safe, dependable, energy generation and an ethos of service excellence. We intend to play a leading role in new nuclear build in the UK and secure a bright future for the combined business and its employees.

Our society depends on energy to live, work, develop and grow. Our customers depend on us to produce affordable low-carbon energy, and we depend on our people to help us take on new challenges and fulfil our ambitions. Being a sustainable and responsible energy business is an integral part of EDF's 2030 strategic business vision – to be an efficient, responsible electricity company and a champion of low-carbon growth.



Doing business in an ethical way is one of our most important values. Through our [Helping Britain Achieve Net Zero](#) approach, we are working to ensure sustainable, ethical practice across our supply chain, and we will not tolerate any fraud, corruption or abuse of human rights. At EDF, we recognise that Modern Slavery and human trafficking are growing global concerns, and we are working to ensure that our own operations, and those of our supply chains, are appropriately evaluating the risks of Modern Slavery and human trafficking. We are working to mitigate these risks as far as possible through our commitment to ethical business. We report our sustainability performance annually through our Helping Britain Achieve Net Zero, and are signatories to the [United Nations Global Compact \(UNGC\)](#). We strive to improve our standards of ethical behaviour continuously, and our commitment to ethical business practice is outlined in our [Ethics & Business Conduct Policy](#). Our commitment to sustainable and responsible business, including steps we plan to take to further address social issues, including modern slavery, are outlined in more detail in our Helping Britain Achieve Net Zero.

Our People

We employ around **11,000** people, alongside a supply chain consisting of around **3,600** suppliers. We also indirectly hire, and work with many more people, including contractors.

All our people are expected to work to our guiding principles for ethical behaviour and our business values are communicated through a variety of channels. We have supporting documents in place to guide our employees to work in an honest and ethical manner, as well as giving them the confidence and tools to report any suspected unethical conduct in the organisation.

Our Codes of Conduct requires and reminds our people that we

are a company that acts honestly and ethically. Employees are reminded that they must report any concerns of potentially illegal activities, unethical conduct or anything that might prejudice the business, using EDF's Confidential Reporting of Serious Concerns procedure.

EDF is committed to fair employment practices and to ensuring legal and regulatory compliance. This commitment, in addition to the policies and procedures described above, collectively demonstrates our on-going commitment to the elimination of any risk of Modern Slavery practices.

Our Supply Chain

We contract with suppliers to ensure that we have the goods and services needed to generate and supply electricity, gas, and energy services to our customers. We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have a rigorous approach to ensuring compliance within our supply chain.

Our supply chain due diligence processes include defined procedures and monitored on-boarding and qualification of all new suppliers. These processes help to identify any potential risks relating to slavery and human trafficking, and we carry out thorough risk assessments to identify areas of focus in relation to Modern Slavery concerns.

Supplier Standards

At EDF we have a set of [Minimum Standards](#) that suppliers are required to abide by. These include a requirement for suppliers to complete a risk-based self-assessment aligned to the 10 Principles of the UNGC. This provides us with our first opportunity to assess and mitigate the risks associated with Modern Slavery.

EDF is currently the UK's largest generator of low carbon electricity which we support with our Powering Net Zero company ambitions.

We encourage our supply chain to drive positive social and environmental change. We include Modern Slavery obligations within our precedent contracts and assess supplier standards at all parts of the procurement lifecycle from specification through procurement and contract delivery.

The initial stage of due diligence for Modern Slavery takes place at the on-boarding of suppliers. This is where we have the opportunity to communicate our expectations, gather specific data and information points, and use that to score responses for comparison, with scoring being done by the subject matter experts.

We also have a Supplier Relationship Management team whose job it is to research and reassess potential supply

chain risks to project delivery. For example, the team recently investigated the potential risks to delivery from the Ukrainian crisis and is prepared to undertake deeper investigations where appropriate if an emerging potential modern slavery risk was identified.

Risk Assessment

We adopt tender specification requirements to set expectations of how goods and services should be delivered. Tenderevaluation processes are also designed to establish whether suppliers can meet these expectations. We consider awarding contracts to companies registered in the UK and additional due diligence processes, where deemed appropriate, are put in place for organisations based outside the UK.

Highest Areas of Risk

Nuclear New Build

Our HPC and SZC projects carry a heightened Modern Slavery risk owing to the complex supply chain structures, as well as the size and transience of the workforce with whom EDF work, via its Tier 1 contractors. Both sites are continually and actively evaluating our assurance processes and seeking to maintain open discussions with suppliers to promote a collaborative approach to ethical and sustainable working practices across the supply chain. Any workers/contractors joining NNB sites are subject to rigorous security checks and there is a well-publicised confidential hotline service which all can use to report concerns. HPC also engaged with an external consultancy who audited HPC's compliance with our Modern Slavery duties. The audit concluded that "the normal risks of a traditional construction site are being well managed and mitigated by EDF's existing measures". As two of the largest infrastructure projects in the UK, HPC and SZC looks forward to building upon its existing Modern Slavery prevention method and drive standards across the wider construction industry.

Power Station Maintenance and Development

Nuclear generation and nuclear new build activities are subject to regulatory oversight from the [Office for Nuclear Regulation](#) and part of this oversight requires a high level of transparency from our suppliers. This includes ensuring that only duly authorised and other suitably qualified and

experienced persons perform duties required by our nuclear generation business. Our parent company, [EDF SA](#), also oversees our ethical performance including alignment to UNGC.

Smart Meter Production and Installation

The known risks around sourcing and installing smart meters are understood and are addressed throughout the tendering and contract management processes, including site-visits to smart meter suppliers. Those involved with installing meters are employed through UK- registered companies and have the relevant security and recruitment checks required by English and/or Scottish law (as appropriate).

Fuel Supply

Obligations contained within our contracts for the purchase of nuclear fuel are aligned to the [UN Declaration of Human Rights](#), the [EU Charter of Fundamental Rights](#) and the [International Labour Organisation](#) conventions. Additionally, EDF engages where possible with suppliers who adhere to the [Bettercoal](#) Initiative. Whilst we recognise that the supply chain for commodity market-traded coal lacks transparency, we limit the use of this source of supply as much as possible.

Most of the gas we buy, both for sale to our customers and for use in our power stations, is purchased via our affiliate company. Our gas is received via the National Balancing Point (which is a gas trading facility run independently of EDF) or via Beach Gas at a UK terminal. As gas is a fungible product, it is not possible for us to track the supply chain backwards.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes EDF's slavery and humantrafficking statement for the financial year ending 31 December 2022.

Signed: 

Director, EDF Energy Holdings Limited

The Republic of Ireland has similar legislation, primarily the Criminal Law (Human Trafficking) Act 2008, as amended by the Criminal Law (Human Trafficking) (Amendment) Act 2013 and the Group's Irish entities (and their subsidiaries) comply with the principles enshrined in that legislation

EDF Renewables Ireland Limited
Wicklow Windfarm Holdings Limited



**Subsidiary organisations covered within the published Group Statement dated
Apr 2023**

- **EDF Energy Customers Limited**
- **EDF Energy Limited**
- **EDF Energy Nuclear Generation Limited**
- **EDF Energy (Thermal Generation) Limited**
- **EDF Energy TSO Limited**
- **EDF Energy Holdings Limited**
- **EDF Energy Renewables Limited**
- **EDF Energy Renewables Holdings Limited**