



# Slavery and Human Trafficking Statement

Stadtwerke München GmbH,  
Financial Year 2023

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# Introduction

Stadtwerke München GmbH is the parent company of the Stadtwerke München Group (the „Group“). As one of the largest municipal energy and infrastructure companies in Germany, the Group and its c.11.000. employees are committed to providing a secure and preferably environmentally friendly supply of energy, urban mobility, forward looking telecommunications services and pure, untreated drinking water. For further information, please refer to the Group’s website [Stadtwerke München \(www.swm.de\)](http://www.swm.de).

Pursuant to Section 54 of the UK Modern Slavery Act 2015 (the „MSA“), this statement constitutes Stadtwerke München GmbH’s slavery and human trafficking statement for the financial year ended 31 December 2023.

It is noted that the UK-subidiaries in the Group carrying on business in the UK, SWM UK Wind One Ltd., GyM Offshore One Ltd., GyM Offshore Two Ltd. and GyM Offshore Three Ltd (the „GyM Group“) as well Spirit Energy Limited (together, the „UK Subsidiaries“), issue their own separate Slavery and Human Trafficking Statements to which reference is hereby made.

## Organisation structure, business activities, and supply chains

The Group is formed of Stadtwerke München GmbH as parent company and six wholly owned subsidiaries, (in accordance with our Group guidelines) so-called core Group companies<sup>1</sup> (“Kernkonzerngesellschaften”) providing our central tasks and services, as well as various other – national and international – subsidiaries (“Beteiligungsgesellschaften”).

Stadtwerke München GmbH is wholly owned by the City of Munich. Its business activities encompass basic services and infrastructure in the following sectors: Energy (subdivided into Generation, Networks, Sales, and Trade), Water, Mobility, Telecommunications, and Public Pools.

As Europe’s largest municipal utility group, we primarily procure durable capital goods such as generation plants, supply grids, vehicles and real estate with associated operations including planning, construction, delivery and maintenance. As part of our commitment as a sustainable municipal entity, we place great importance on supporting local supply chains: 30% of our procurement volume derives from the Munich metropolitan region, with a total of 65% deriving from the federal state of Bavaria. Beyond the national borders of Germany, we source around 5% of our diverse requirements directly from 27 countries, which are primarily located in the European Economic Area.

In relation to the UK, the UK Subsidiaries have an interest in several UK offshore wind farms, including a wind farm located off the North Wales coast established by the GyM Group (the **“Project”**), which is one of the largest operating offshore wind farms in the world. The GyM Group have appointed RWE Renewables UK Swindon Limited (**“Innogy”**) to provide certain services in respect of the Project under a management services agreement. For further information on the UK Subsidiaries supply chains, please refer to the Slavery and Human Trafficking Statements produced separately in respect of the UK Subsidiaries and Innogy. Stadtwerke München GmbH then markets the electricity produced by its UK Subsidiaries on the electricity exchange in the UK.

<sup>1</sup> SWM Services GmbH, SWM Infrastruktur GmbH & Co. KG, SWM Infrastruktur Verwaltungs GmbH, SWM Versorgungs GmbH, SWM Kundenservice GmbH and Münchner Verkehrsgesellschaft mbH (MVG).

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As such Stadtwerke München GmbH's and the Group's supply chains in relation to UK activity are limited, i.e. only a limited range of supplies is required for marketing produced electricity in the UK (outside of the activities of the UK Subsidiaries themselves which, as noted, have produced their own Slavery and Human Trafficking Statements). Stadtwerke München GmbH approaches and manages the risk of slavery and human trafficking in relation to the same within the framework of its wider policies and procedures described below.

# Policies and Procedures

We have implemented a Compliance Management System to help ensure compliance with legal and internal company regulations. An important part of this system is the various policies and procedures we have implemented to help ensure the observance of human rights within our own business area as well as our supply chains.

Stadtwerke München GmbH is within the scope of the German Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz – LkSG). The LkSG regulates corporate responsibility for compliance with human rights in an organisation's own business area and global supply chains (within the meaning of the LkSG), as specified in several due diligence obligations that companies must adhere to. These due diligence obligations include, among others, the implementation of risk analysis, the establishment of preventive measures, the adoption of remedial actions once legal violations have been identified as well as the establishment of an appropriate internal complaints procedure. They also include the prevention of modern slavery and human trafficking in own business area and supply chains within the meaning of the LkSG.

Regarding the prevention of modern slavery and human trafficking, we highlight the following elements of our Compliance Management System:

### ► Policy Statement on our Human Rights Strategy

We issued a policy statement on our human rights strategy (last updated in May 2024) that describes in detail our procedures for complying with human rights and

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environmental due diligence obligations in our own business area and supply chains (within the meaning of the LkSG). The policy statement also outlines the specific risks and our human rights and environment-related expectations of all of our employees and suppliers. The policy statement can be found on our website ([Compliance at SWM, Stadtwerke München](#) – see tab „principles“) as well as on the corporate intranet.

### ► Business Partner Code of Conduct

We are fully committed to lawful conduct and value-based corporate governance in all contractual relationships and dealings with our business partners and customers. We also expect our suppliers to conduct their business activities with integrity and responsibility and, in particular, to comply with all applicable laws on respecting human rights and environmental concerns.

Our Business Partner Code of Conduct contains our most important principles for legally compliant, responsible and honest conduct, which informs our approach to business relationships with business partners. It is agreed as a binding contractual basis with direct suppliers in the case of corresponding influence and abstract or concrete LkSG risks, otherwise it is brought to the attention of the direct suppliers. In particular, the Business Partner Code of Conduct expressly stipulates that our business partners also strictly reject any form of slavery, servitude, forced or compulsory labor (e.g. through human trafficking) and comply with the applicable laws prohibiting such practices. They also have to respect the principle of freely chosen employment and do not tolerate any involuntary work and services. Our business partners shall comply with the principles of our Business Partner Code of Conduct throughout their entire activity in their own business area.

The Business Partner Code of Conduct came into effect on June 1, 2020, and was updated as of January 1, 2023. It can be found on our website ([Compliance at SWM, Stadtwerke München](#) – see tab „business partners“) as well as on the corporate intranet.

### ► Code of Conduct

Our Code of Conduct contains binding regulations and principles for compliance with applicable laws and responsible behavior for the management board and our employees. All employees are provided with the Code of Conduct as part of their

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induction and asked to confirm they have read and understood the content. The Code of Conduct, updated as of March 1, 2024, is also published both on the SWM website ([Compliance at SWM, Stadtwerke München](#) – see tab „principles“) and on the corporate intranet.

Please consult the separate MSA statements in respect of our UK Subsidiaries and Innogy for further information on policies and procedures specific to our UK operations, including the procedures for selecting and engaging with external suppliers of services in relation to our UK-based projects.

# Risk Management and Due Diligence

## ▶ Human Rights Officer and LkSG Risk Management

In 2023, we appointed a Human Rights Officer who is responsible for monitoring our LkSG risk management and reports to the Stadtwerke München GmbH Executive and the Supervisory Board as part of the annual compliance report on his activities. The Human Rights Officer also reviews the effectiveness of our preventive measures, remedial actions and our internal complaints procedure on an annual and ad hoc basis.

## ▶ Compliance Risk Analysis

We carry out compliance risk analysis regularly to identify relevant risk. In order to determine the human rights risks and environment-related risk within the meaning of the LkSG, specific LkSG-risk analysis are carried out on a regular basis.

### ▶ Business Partner Checks

New business partners undergo specific and risk-based Business Partner Checks using an inspection software before entering a business relationship. If the business partner is a supplier within the meaning of the German LkSG, an additional check regarding the requirements of the LkSG („LkSG assessment“) will be carried out. The Checks are repeated at regular intervals during an ongoing business relationship.

Please consult the separate MSA statements in respect of our UK Subsidiaries and Innogy for further information on risk management and due diligence measures specific to our UK operations, including the procedures for selecting and engaging with external suppliers of services for our UK-based projects.

## Training and Communication

We have implemented a training model to familiarize our employees with relevant compliance guidelines and procedures and to raise their awareness accordingly.

We use (mandatory) compliance e-learning courses to ensure that our employees are familiar with key compliance regulations, such as the Code of Conduct or Business Partner Code of Conduct. In addition to the e-learning courses, the knowledge acquired is consolidated in risk based face-to-face training sessions with selected employees using case simulations. We also provide information on the application of the German LkSG on the intranet.

In addition to general compliance training, employees of our central Purchasing and Logistics unit are trained to apply the established standards in their day-to-day business and in the individual work processes. In particular, they are trained and sensitized with regard to identifying risks in supply chains when initiating and fulfilling supplier contracts.



# Monitoring and Reporting

If we discover a human rights-related violation, remedial actions will be taken without delay. Depending on the nature and the extent of the violation, we will work out appropriate remedial actions to prevent, end or minimize the extent of this violation.

Employees, temporary workers, customers, suppliers, other business partners and the general public can use our whistleblowing system to confidentially report violations of laws and regulations, including possible violations of human rights obligations.

Further details are published both on the SWM website ([Compliance at SWM, Stadtwerke München](#)) and on the corporate intranet.

This statement will be reviewed annually and published on the SWM website ([Compliance at SWM, Stadtwerke München](#) – see tab „principles“).

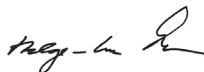
Munich, 24th July 2024



**Dr. Florian Bieberbach**  
Chairman of the  
Management Board



**Ingo Wortmann**  
Member of the  
Management Board



**Helge-Uve Braun**  
Member of the  
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