

MODERN SLAVERY ACT 2015

EDFT Trading 2018 Statement on Modern Slavery and Human Trafficking

This statement is made in accordance with the Modern Slavery Act 2015 and sets out the steps taken by EDF Trading Ltd (EDFT) to ensure that slavery and human trafficking are not taking place in our business or our supply chains. It covers the entities EDF Trading Ltd and EDF Trading Markets Ltd.

1. Overview

EDF Trading is a 100% owned subsidiary of the EDF Group, which is a leading energy player active in all major electricity markets. It operates worldwide, with major offices in London, Paris and Houston covering business areas including energy trading and energy services.

EDFT has considered all of its major supply chains. These cover the purchase of physical energy commodities (power and gas), computer hardware, furniture and office fittings, consumables such as drinks and cleaning supplies, and cleaning and maintenance staff. As EDFT is an energy trading company, purchases other than energy commodities form a small part of our business and we predominantly use suppliers with a UK base who are also subject to the Modern Slavery Act.

Commodities such as gas and electricity form the main part of our business but these are fungible, and it is not possible to track supply chains backwards. However, we do not consider these to be purchases where there is a high risk of modern slavery or human trafficking. We have therefore focussed our compliance efforts for 2018 on more tangible products where it is possible to identify the supply chains and take steps to assess them. These include the provision of office services such as IT consultancy, and computer equipment.

2. Policies in relation to slavery and human trafficking

EDFT is proud to be a member of the United Nations Global Compact (UNGC) via the membership of our parent company EDF SA, and supports the UNGC goals. These include supporting the International Declaration of Human Rights and the core conventions of the International Labour Organisation. Our human resources guidelines include policies to support equal opportunities and against bullying and harassment. All employees and contractors (such as cleaning staff) are paid the London Living Wage and we are compliant with the EDF Group code of ethics, which upholds the Group's ethical commitments and values. Our procurement policy has a section specific to the Modern Slavery Act and requires all employees to consider the goals of the Act in all purchasing decisions, by investigating the labour practices and supply chains of potential suppliers. Additionally we have a third party whistleblowing hotline that is available to all employees and contractors, to report any instances or suspicions of slavery, human trafficking, or other unethical behaviour.

3. Risk assessment

Having reviewed and evaluated all of our supply chains, we have determined that the greatest risk of modern slavery and human trafficking lies in the purchase of IT consultancy services (which are often outsourced overseas) and computer hardware. We have therefore concentrated our efforts on these supply chains.

4. Steps taken to assess and manage the risk of modern slavery and human trafficking

4.1 IT Consultancy

EDFT has long standing relationships with most of its suppliers of IT consultancy. All have been contacted to enquire what steps they are taking to ensure that none of their staff are victims of human trafficking or modern slavery, and to ask what action they have taken in relation to their own supply chains. All suppliers required to do so have produced their own statement on Modern Slavery and Human Trafficking. Those suppliers who are not required to produce a statement have advised us of the measures they are taking in relation to their staff and their own supply chains.

4.2 Computer Hardware

The majority of the computer hardware available for sale in the UK originates in countries which do not have a

good reputation for respecting the rights of workers. However, while computer hardware is a major expense for EDFT, we recognise that our purchases are small given the overall size of the market and our market power is limited.

In order to mitigate the risk of modern slavery in our supply chain for computer equipment we use only suppliers with a UK base, who are subject to the Modern Slavery Act. We have written to all of our suppliers asking them what they are doing to ensure there is no modern slavery or human trafficking in their supply chains. Additionally, the majority of our purchases consist of branded products whose suppliers already publish anti-slavery statements in accordance with the California Transparency in Supply Chains Act of 2010. We will continue to review our supply chains for all IT equipment in line with our procurement policy. Furthermore, we ensure that obsolete IT equipment is recycled in an ethically responsible way.

5. Performance Indicators

The majority of our IT purchases came from tier one suppliers who were compliant with the Modern Slavery Act. Our six largest brands of IT hardware are all manufacturers who have published robust anti-slavery policies or statements (either in accordance with the Modern Slavery Act or the California Transparency in Supply Chains Act).

6. Training

All staff involved in purchasing decisions and contracts are aware of the EDFT procurement policy, which is also available on our intranet. Key staff involved in the procurement of IT hardware and consumables have been specifically trained on the requirements of the Modern Slavery Act.

The board of directors of EDF Trading approved this statement at its meeting on 14 February 2019.

John Rittenhouse
Chief Executive Officer
EDF Trading Ltd