

HPC 2024 Modern Slavery Statement

Introduction

Hinkley Point C (HPC) is being constructed on the Somerset coast by NNB Generation Company (HPC) Limited (“HPC”), a subsidiary of EDF Energy Limited (EDF) and is one of the largest construction sites in Europe. When generation begins, the nuclear power station will provide low carbon electricity to around 6 million homes.

Whilst HPC is referenced in the EDF Energy UK statement, the project’s Board of Directors is mindful of the risks of modern slavery and worker exploitation associated with the construction of a large infrastructure project. The safety and wellbeing of the workforce is of paramount importance to HPC - we have zero tolerance for modern slavery or human trafficking across our business and within our supply chain. The publication of this statement demonstrates the project’s commitment to controlling the risk of modern slavery or human trafficking in all its forms across the project, aligning with our broader Environmental, Social, and Governance (ESG) principles to ensure ethical practices.

Risk exposure to modern slavery is ever evolving. We are dedicated to adapting our business and working with our supply chain accordingly. The current socio-economic and political landscape, including conflicts across the globe, have led to new potential opportunities for human traffickers to traffic vulnerable people into the UK to work. Therefore, we must ensure that our policies remain up to date to manage this increased risk.

Our People

The project has a duty to protect all workers from the risks of modern slavery, whether or not they work directly for HPC or form part of the wider supply chain. The HPC commitment of “Zero Harm” is the sites over-riding priority in ensuring that all workers on site are safe and feel protected, which includes being safe from modern slavery related threats.

Contractual protections and worker checks

Workers on site are either employed directly by NNB Generation Company (HPC) Ltd or are contracted to our project by one of our named agencies or contractors. As part of the mobilisation process minimum onboarding requirements are clearly set out to our Tier 1 contractors. Each worker is appropriately onboarded by their contracting organisation, this includes a combination of pre-employment checks and vetting to provide a level of assurance. The employing organisation, with support of their appointed Screening Service Company, will check their identity, and right to work in the UK in line with HMG Baseline Personnel Security Standard. If applicable, as part of the BPSS Process, a Criminal Record Check will be completed by the EDF Central Vetting Team.

All of our people working on our HPC site and associated developments are expected to work within our guidelines on ethical behaviour, which is set out in the HPC Worker Code of Conduct which is listed in the Universal Document Selection Tool (UDST) for inclusion in all our contracts and communicated to all workers when they attend the mandatory induction process prior to joining our project.

As part of the mobilisation process Tier 1 contractors are provided with formal procedures and guidance on the minimum requirements to onboard workers against. The EAU Workforce Audit Team carry out regular audits on 10% samples of newly onboarded workers. From time to time the EAU audit team will provide additional guidance and direction to T1 contractors.

Training

Completed by every member of the workforce, the project induction includes information on modern slavery and about our “SafeCall” confidential whistleblowing service, which allows people to anonymously inform us of potential modern slavery issues at HPC. The content explains what modern slavery is and the high risk to the construction industry today. The induction highlights means by which instance of modern slavery or worker exploitation can be identified and an explanation is given as to how such concerns can be reported.

In addition to the HPC induction process, each Tier 1 Contractor must have their own, separate induction process for any staff working directly with them or via a subcontractor. Both inductions are open to attendance by trade union representatives with a view to supporting recruitment to the trade unions and offering further protection for the workers.

HPC has also recently launched a new training course developed in collaboration with the UK's largest modern slavery charity, Unseen. The course is tailored to HPC's specific requirements to help staff spot and report where modern slavery or worker exploitation may occur. Project wide awareness of this critical issue is also furthered via "Lunch and Learn" sessions and daily safety messaging, the latter of which allows the communication of the project's expectations and how concerns can be reported across the project's 13,000 strong workforce.

Stewards, Mental Health First Aiders and Accommodation Providers

At HPC, in addition to trade union safety representatives, there are over 100 stewards from diverse backgrounds who assist in identifying instances of any form of worker exploitation occurring. The stewards provide a clear point of support and present a continuous opportunity for workers to be able to raise any issues or concerns. Negative mental health can also be regarded as an indicator of modern slavery and our network of more than 400 mental health first aiders are trained to provide support in these instances.

The project is proud to be supported by a number of trade unions. Our contractors and subcontractors must not prevent or discourage workers from joining or forming trade unions. We do not tolerate any form of blacklisting of any worker under The Employment Relations Act 1999 (Blacklisting) Regulations 2010.

Our Supply Chain

To ensure that our suppliers are committed to the same values as we have as a project, our Tier 1 contractors (i.e. the organisations with whom HPC contracts directly) are subject to detailed assessments at onboarding stage to demonstrate they are committed to meeting their legal obligations, including adherence to the Working Time Regulations 1998, as well the project's own stringent standards in ensuring worker exploitation does not occur at HPC. Specifically, when suppliers are invited to submit tenders for contracts, the project issues a pre-qualification questionnaire ("PQQ"). The PQQ includes questions that help us identify any potential risks relating to modern slavery within a supplier's organisation, whilst also presenting us with the opportunity to communicate our expectations in relation to modern slavery and explain the thresholds our suppliers are required to meet. HPC are committed to ensuring that our suppliers engage with our commitment to have a supply chain free from modern slavery and take action to ensure this is maintained within their own supply chains.

On HPC, two independent contractors have been engaged to carry out monthly audits on the contractors that work on our construction site and report back to HPC. The monthly audit reviews the payroll records of workers employed by our contractors, to mitigate the risk of modern slavery or human trafficking on site. These audits highlight; the number of workers engaged by each contractor the hours worked, the allowances paid, the leave that has been taken, and the welfare cover provided. An additional Pensions audit is undertaken once per year. These audits help us ensure that people are being paid and managed in line with the HPC Industrial Relations Agreements. Payroll records for more than 10,500 site operatives were subject to audit last year. The audits indicate a good level of compliance, the auditors 'raise observations' where they spot potential non-compliance which gives the contractors the opportunity to resolve any concerns.

Governance and Management of Risk

Internal management of the project's anti-modern slavery control measures is governed by our Modern Slavery Forum. This forum is comprised of representatives from the Employment Affairs Unit, Industrial Relations, Security, Supply Chain, Stakeholder Relations, Compliance & Legal. This forum meets regularly to discuss developments in this area, areas of concern and the effectiveness of the controls in place to mitigate the risk of modern slavery or worker exploitation occurring. The forum maintains a "risk register" setting out how modern slavery risks may eventuate at HPC and the suite of measures in place to control these.

In addition, internal audits carried out by compliance specialists provide further assurance around the effectiveness and robustness of policies, control measures, and procedures that are in place, whilst also promoting a strong governance framework in this space.

Policy

In addition to the policy and approach to induction process, on-site worker welfare management, and systematic monthly audits as outlined above HPC require contractors to directly hire construction operatives where possible, this ensures that records of payments to workers, and the terms and conditions of their contracts, are included in the audit

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scope. Note that where agencies are used to find staff, these agency arrangements are only used on a short-term basis and only agencies approved by the Site Joint Council and Joint Project Board can be used.

External Agency Engagement

To foster collaboration with Avon & Somerset Police, and to discuss the mitigation of Serious Organised Crime at HPC and the local area, the HPC Security Team have recently established with Somerset and Avon Constabulary a working group which meets on a quarterly basis. The group is comprised of representatives from Avon and Somerset Constabulary Police Intelligence, the Regional Organised Crime Unit, Community Policing, CNC, Home Office Immigration Field Intelligence, Enforcement and Economic Departments, HMRC, Charities, Crimestoppers, and Unseen. The group has developed a '4 P Plan' - Pursue, Prevent, Protect, and Prepare - which is aimed at improving the intelligence landscape and mitigating the risk of serious organised crime, which is closely associated with instances of modern slavery or worker exploitation.

In addition, Avon & Somerset Constabulary Intelligence Unit delivered a briefing in October 2024 on modern slavery and labour exploitation to the HPC security team, vetting team and security responsible representatives from nominated T1. The brief focussed on illegal entry, human trafficking versus human smuggling, signs of slavery, supporting victims, reporting concerns and the risks.

Outside of the working group we also maintain relationships with Unseen, and Gangmasters and Labour Abuse Authority (GLAA) to share knowledge, ensure best practice and seek support as and when required.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes HPC's slavery and human trafficking statement for the financial year ending 31 March 2025.

Signed:



Date: 14/04/2025

Stuart Crooks, Managing Director
NNB Generation Company (HPC) Ltd

