



**MODERN SLAVERY  
& HUMAN TRAFFICKING  
STATEMENT 2024**





# INTRODUCTION

Sizewell C Limited is committed to being a responsible business which respects human rights and strongly opposes all forms of modern slavery and human trafficking.

This statement relates to the financial year ending 31 March 2025 and describes the approach taken by Sizewell C to assessing and addressing the risk of modern slavery and human trafficking in connection with its business and supply chains.

Sizewell C is not required to provide a modern slavery statement under the Modern Slavery Act 2015. However, due to the size of the Sizewell C project and the ethical standards we strive to maintain, modern slavery is a key concern which is important to address. As set out in our refreshed Code of Conduct, we are committed to preventing and mitigating modern slavery and human trafficking risks across our business and within our supply chain.

## ABOUT US

We are the entity constructing Sizewell C, a 3.2 gigawatt nuclear power station in the UK, designed to provide low-carbon electricity for approximately 6 million homes. We are currently a joint venture between His Majesty’s Government and EDF Energy. Our mission, encapsulated in ‘the Power of Good for Britain’, entails significant investment towards achieving a Net Zero future for the UK.

By fostering opportunities within local communities, we aim to mitigate the risks of modern slavery and human trafficking both on site and within our operations. Our commitment includes delivering 70% of the project’s construction value to UK businesses, and we will inject over £4.4 billion into the East of England economy alone. The project will create 10,000 direct jobs and support thousands more across the UK, with a third of our construction workforce coming from the local area.

As with any large construction project, we acknowledge the potential risks of modern slavery and human trafficking risks across our supply chain, on site and within our own operations. We mitigate these risks through the measures described in this statement, which are integral to ensuring the highest standard of ethical conduct and safeguarding against exploitation throughout our operations.





# OUR SUPPLY CHAIN

We are committed to ensuring that our suppliers uphold our commitment to achieve a supply chain free from modern slavery. We actively encourage them to take proactive measures to achieve and uphold this standard within their own supply chains.

OUR CURRENT SUPPLIERS ARE BASED IN THE FOLLOWING COUNTRIES:

- China
- France
- Germany
- Italy
- Luxembourg
- Spain
- Sweden
- Switzerland
- United Kingdom
- USA

To ensure that our suppliers’ actions align with our values, our tier 1 suppliers are subject to detailed reviews and both initial and ongoing due diligence.

The Procurement and Contracting Strategy for Sizewell C is designed to replicate the supply chain established for our sister project Hinkley Point C (‘HPC’).

This approach emphasises the active sharing of lessons learned between the two projects, which will be utilised to inform and enhance our sourcing decisions. By leveraging insights gained from HPC, we aim to ensure a more efficient and responsible procurement process that aligns with our commitment to ethical sourcing and modern slavery prevention.





# OUR SUPPLY CHAIN

## INITIAL DUE DILIGENCE

For contracts valued at £50,000 or more, our supply chain due diligence typically begins with the issuance of a pre-qualification questionnaire (“PQQ”) to potential suppliers. The PQQ includes mandatory questions designed to identify any potential modern slavery risks.

Amongst other things, potential suppliers must confirm whether they undertake ongoing monitoring for modern slavery and human trafficking by their connected or related parties, and explain the policies, procedures and systems in place to ensure there is no modern slavery or labour exploitation within their workplace operations and supply chains.

Potential suppliers which pass the PQQ stage are invited to submit a tender for the relevant contract. Our tender questionnaire may further enquire into several aspects of the potential supplier’s supply chain, including by requesting: (i) a total supply chain map for the project; (ii) details of its supply chain management process; and (iii) details of its supply chain strategy.

Regardless of a contract’s value, all new suppliers are subject to due diligence checks during the onboarding process to our supplier information management solution.

For new or replicated contracts, we ask our suppliers to provide a copy of its latest modern slavery and human trafficking statement (or equivalent), if they are obligated to publish one. In addition, we request details of any internal or external investigations or convictions related to child labour or human trafficking.

## ONGOING MONITORING

Suppliers undergo periodic re-screening via our supplier information management solution – this involves repeating various due diligence checks.

We have selected a provider to deliver a supplier risk and mapping solution that will support the identification and mitigation of modern slavery risk through event alert monitoring. This system will identify risks up to tier 4 of our supply chain network. Event alert monitoring allows us to take a proactive approach to continuously track and analyse modern slavery events within our supply chain. We expect this solution to be implemented and fully operational by mid-2026.

Regardless of a contract’s value, all new suppliers are subject to due diligence checks during the onboarding process





# OUR PEOPLE

We are committed to taking steps to protecting our people, whether directly employed by Sizewell C or forming part of the site workforce, against the risks of modern slavery.

## CONTRACTUAL PROTECTIONS AND WORKER CHECKS

To mitigate the risk of modern slavery, we conduct rigorous pre-employment checks, including identity and right to work checks as well as capability confirmations, for all new Sizewell C employees and all on-site workers. Where on-site workers are not Sizewell C employees, our Employment Affairs Unit conducts monitoring, assurance and audit processes to verify our contractors' compliance in carrying out the pre-employment checks. In addition to checks on individual workers, the Employment Affairs Unit also manages a Labour Agency Approval process, meaning suppliers are only permitted to employ workers through agencies that have been through a vetting process and been approved for use by Sizewell C.

We are preparing for a significant increase in the number of operational site workers who are either employed by us or contracted to work on Sizewell C. All of our operational site workers, including contractors not employed directly by Sizewell C, are informed of our high ethical standards and the risk of modern slavery as part of their SZC Site Induction. Attendance of this is a mandatory pre-requirement within the onboarding process and has to be completed prior to any worker attending the SZC Site.

Within the invite to the SZC Site Induction the below media information is available to all invitees and is sent to their personal contact information.



In the next year, we aim to develop a series of automated checks to identify potential instances of modern slavery and human trafficking via our Workforce Information Management System (WIMS). Where these checks identify any workers as potentially at risk of modern slavery or human trafficking, this will be followed up swiftly and appropriate by a person with appropriate training.

## TRAINING

### SITE INDUCTION

During the SZC Site Induction, we inform all participants about our external confidential hotline, Safecall (operated by Safecall Limited), available to both Sizewell C employees and contractors' employees. It allows people to anonymously report suspected misconduct, illegal activities or serious concerns – including in respect of potential modern slavery issues at Sizewell C. Sizewell C is committed to ensuring that all workers on site are safe and feel protected, which includes being safe from threats such as modern slavery.

During this year, we updated the Site Induction briefing so that it included more specific and targeted information on modern slavery – including an explanation of what modern slavery is and how it is present in the construction industry today. The briefing will also highlight ways to spot modern slavery on site and explain the steps which should be taken if a worker has concerns that someone is at danger of being exploited.

In the next year, we will place posters providing information about modern slavery and human trafficking, in key on-site locations such as break rooms, canteens and restrooms.

### POSTERS

During 2024, we created an informative poster in digital format to highlight the signs of modern slavery and the importance of seeking assistance for anyone that could be a victim of modern slavery. The digital posters were showcased on various screens throughout our offices.

### SHAREPOINT RESOURCE HUB

To further support our workers, we have established an internal SharePoint site that provides comprehensive information on how to identify modern slavery. This site includes printable posters to convey the same message as the aforementioned digital poster, which have also been translated into the languages of most of our workers' home countries, ensuring accessibility and understanding for all workers.

Our multi-channel approach reinforces our message and keeps the issue of modern slavery at the forefront of our corporate culture.

Our SharePoint site also contains supplementary guidance that offers more detailed insights into the issue.

The SharePoint site will be published in the next year so that it is available for external members of our supply chain to access within our Delivery Site.





OUR PEOPLE



CODE OF CONDUCT

We refreshed and updated our Corporate Code of Conduct, which launched in March 2025. The Corporate Code of Conduct explicitly addresses modern slavery. This document serves as a guiding framework everyone working for, or on behalf of Sizewell C. It outlines our commitment to ethical practices and the expectations we have regarding the treatment of all individuals including those within our supply chain. It also encourages everyone to Speak Up and report any concerns through the appropriate channels.

In the next year, we plan to launch an eLearning module that will accompany the newly launched Code of Conduct, which will include a section on modern slavery awareness. This training will ensure that all employees understand the importance of the Code and are equipped to identify and report any concerns related to modern slavery.

DAILY SAFETY MESSAGES

As part out our daily operations, we incorporate a safety message into all our meetings. We included a safety message that emphasised the importance of being aware of modern slavery in the construction industry and its potential impact on our work environment. This was also presented during one of our monthly all-team calls to maximise reach to as many employees and contractors as possible. By fostering open dialogue, we aim to empower our workforce to recognise and report any concerns.

INDUSTRIAL RELATIONS

Our Sizewell C Industrial Relations Construction Agreements, of which there are three covering each key phase of construction, were formally approved in April 2024. These agreements, created in consultation with trade Unions and tier 1 contractors, are underpinned by the SZC Social Covenant which sets an expectation that the project will deliver ‘best in class’ welfare and terms and conditions of employment and includes provisions to address worker exploitation.

The need for interim arrangements that apply before the Industrial Relations Construction Agreements themselves are formally enacted was recognised by all parties and is reflected in an appendix to the agreements, called Transitional Arrangements and Minimum Standards (“TAMS”).

TAMS provides a structured and proportionate level of guidance, governance and oversight in respect of all people and employment activities related to any site activity occurring before the Collective Framework Agreements are enacted.

TAMS establishes the following requirements in relation to workers undertaking civil engineering, engineering construction or site operations trade work:

- fair and transparent recruitment and selection practices;
- agreement between Sizewell C and relevant trade unions to the involvement of any labour supply companies;
- the application of the Living Wage (as published by the Living Wage Foundation) as the minimum requirement of individual worker remuneration;
- a proportionate Zero Harm safety and well-being programme;
- support for the workers’ right to be members of a trade union and encouragement of collaboration between trade unions and employers to reach agreement over local arrangements for trade union access to members;
- deployment of trade union safety representatives, where practicable; and
- Employee Affairs Unit (“EAU”) oversight to ensure that these standards are being met.

Governance and oversight of the application of TAMS at site is delivered through the TAMS Committee. The TAMS Committee meet monthly and brings together senior representation from Sizewell C, Trade Unions and key site-based contractors to:

- Gain oversight of employment activities at site.
- Gain oversight of employment activities at site.
- Provide a structure for resolution of issues.
- Oversee workforce management during the Transitional Arrangements period
- Foster a collaborative approach to workforce challenges
- Deliver assurance directly into the wider H&S Governance structure on people and employment related activity.



# OUR POLICIES



At Sizewell C, the Corporate Compliance and Ethics function has general oversight of modern slavery risks, for which supplier risks are identified and managed by the Supply Chain team and worker related risks are identified and managed by Human resources.

We have two Code of Conduct documents:

## 1. OUR CORPORATE CODE OF CONDUCT

which serves as a guiding framework for everyone working for, or on behalf of Sizewell C. It outlines our commitment to ethical practices and the expectations we have regarding the treatment of all individuals within our supply chain.

## 2. OUR SZC WORKER CODE OF CONDUCT

designed to set clear expectations for the behaviour of all workers on site and in the local community.

Both documents emphasise our high ethical standards and focus on Zero Harm. Our Corporate Code of Conduct also outlines the importance of upholding human rights and encourages everyone to report their concerns – including any modern slavery and human rights concerns – via our external confidential hotline, Safecall.

In addition, our Ethics and Business Conduct Policy, emphasises our commitment to identifying, assessing and managing our human rights risks. It also confirms our expectation of high standards of ethical behaviour and business practice and encourages employees to report any serious concerns about potential breaches of ethics to a manager or senior team member or via the anonymous Safecall hotline.

Finally, we developed a comprehensive guidance document designed to assist our employees in identifying the signs of modern slavery. This document outlines key indicators that may suggest the presence of modern slavery within our operations or supply chain. Additionally it provides clear and actionable guidance on the steps to take if any signs are identified, ensuring that our workforce is equipped to respond appropriately, and report concerns effectively.

By fostering awareness and providing practical resources, we aim to empower our employees to play an important role in combatting modern slavery.



# RISK ASSESSMENT & MANAGEMENT

Sizewell C’s exposure to the risk of modern slavery and human trafficking is evolving, and 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. In order to manage this increased risk, we must ensure that our policies and due diligence processes remain current.

Representatives from the Sizewell C EAU team attend Modern Slavery Working Forums with the HPC project to share areas of best practice and learn about the processes which HPC has put in place to mitigate the risks posed by modern slavery to large, complex infrastructure projects.

In addition, we have benefited from reviewing third party analyses carried out in respect of HPC’s modern slavery and labour exploitation risks; our learnings from this review are being considered as we continue to develop our strategy for mitigating the risk of modern slavery and human trafficking occurring on-site or in our supply chains.

We have initiated a sourcing strategy to identify an appropriate supplier and expect to commence a human rights risk assessment (which will incorporate modern slavery and human trafficking risks associated with the Sizewell C project) by the Q3 2025, with the aim of completing it by 2026. Following this assessment, we will ensure that any new or revised policies reflect the findings of our completed risk evaluations. We also plan to nominate a single person who will hold overall responsibility for Sizewell C’s approach to modern slavery – this person will receive appropriately tailored training for this purpose.

**FUTURE INITIATIVES ON RISK MANAGEMENT**  
Looking ahead, we are committed to enhancing our efforts in the fight against modern slavery through the following initiatives. Through these initiatives, we reaffirm our commitment to eradicating modern slavery and fostering a safe and ethical working environment for all our employees at Sizewell C.

**MODERN SLAVERY STEERING COMMITTEE**  
We plan to establish our own Sizewell C Modern Slavery Steering Committee, which is expected to be fully operational by 2026. This committee will oversee our compliance efforts and ensure that modern slavery considerations are integrated into our business practices.

**MODERN SLAVERY CHAMPIONS**  
We will introduce Modern Slavery Champions within our organisation. These individuals will serve as points of contact for employees, relaying important messages and providing support related to modern slavery awareness and reporting.

**NGO ENGAGEMENT**  
During the next year, we aim to engage with a non-governmental organisation (NGO) that specialises in modern slavery issues. This partnership will provide us with expert guidance, best practices, and access to valuable resources to bolster our modern slavery programme.







[info@sizewellc.com](mailto:info@sizewellc.com)

0800 197 6102

[sizewellc.com](https://sizewellc.com)

Registered office:

25 Copthall Avenue, London EC2R 7BP  
Registered in England & Wales:  
Registered No. 09284825



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