

# Global labour and employment rights policy

Ørsted is committed to ensuring a sustainable, safe, and inclusive working environment where all employees can thrive. The purpose of this policy is to create transparency for our employees within labour and employment rights by describing our commitment to actively safeguarding labour, employment, and human rights standards.

## Introduction

At Ørsted, we are committed to respecting human rights in everything we do. This commitment means actively working to ensure fair labour and employment standards for our employees across all the markets where we operate.

Respecting employee labour and employment rights is key to protecting our employees' human rights, and it is the foundation for ensuring a company culture with respect for people.

This policy describes the way in which we respect labour, employment, and human rights standards as described in relevant legislation as well as international standards and conventions, such as the International Bill of Human Rights and the fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

## Eligibility

This policy applies as of 1 February 2024 and includes all employees in all Ørsted entities. If any provision in this policy conflicts with country legislation, such legislation prevails.

All employees must keep themselves informed about and follow this policy, and Ørsted reserves the right to amend this policy at any time.

## Sustainable working hours

We see fair and sustainable working hours as fundamental rights that are essential to securing our employees' well-being. To uphold these rights, we are committed to ensuring that all our employees are working under fair employment

terms concerning working hours and overtime and to complying with local laws across all the markets where we operate.

To support this, we have policies and procedures in place to secure fair working conditions for all our employees.

For further information on our commitment to ensuring sustainable working hours, please refer to [Ørsted's Global working hours commitment](#).

For information on our internal global guidelines on flexible working arrangements, please refer to our internal [Global guidelines on flexible workplace](#).

## Fair and equal pay

Ørsted is committed to creating a workplace in which all employees can thrive, perform, and grow. In line with that ambition, and to continuously attract, motivate, and work to ensure that talent stays in Ørsted, we want to offer our employees fair, equal, competitive, and market-aligned remuneration.

'Fair and equal pay' encompasses that all employees receive equal pay for equal work, or work of equal value, regardless of gender, race, age, or other possible discriminatory factors. Any differences in pay must be due to differences in position level, skills, responsibility, effort, or working conditions.



Ørsted, like many other companies, pays employees according to the labour market in the countries we operate in, and we are committed to paying employees' wages that ensure that their basic needs can be met.

Finally, we ensure that all our employees are paid on time, as per their local employment contracts.

For further information on our total rewards philosophy, please refer to our internal [Remuneration policy](#).

### **Leave entitlements to support work-life balance**

Ørsted aims to be a healthy and safe workplace for all employees. As part of our culture and employer values, we strive to support a healthy work-life balance with market-aligned leave entitlements to ensure that employees can take time off for both their mental and physical well-being.

In connection with this, we have a strong focus on providing rest periods, breaks, and competitive leave entitlements for all our employees.

Leave entitlements may include annual leave, public holidays, leave, dependents' leave, sickness leave, or other types of leave, as per local legislation and market practice.

Furthermore, we strive to be an inclusive workplace where diversity and gender equality are prioritised. This commitment includes supporting new parents by providing flexibility and increased child bonding time. We safeguard this by ensuring global minimum standards for parental leave for all employees globally.

For further information on our global minimum standards for parental leave, please refer to our internal [Global policy on parental leave](#).

For further information on local leave entitlements, please refer to our internal [employment terms and policies](#).



### **Prohibition of child labour and protection of young workers**

In Ørsted, we see human rights as fundamental principles for protecting people's dignity and ensuring freedom and respect for people. In connection with this, we believe that children have a right to healthy, physical, emotional, and mental development throughout their childhood. This includes a commitment to ensuring compliance with child labour regulation and not employing people under the legal minimum working age.

We adhere to minimum age provisions of national laws and regulations and, where national law is insufficient, take account of international standards.

To fulfil this commitment, we have recruitment procedures in place to collect the required data, to the extent possible and within the limits of data protection regulation. For further information on our approach to human rights, please refer to our externally available [Ørsted Global Human Rights Policy](#).

For information on Ørsted's commitments within general data protection regulation, please refer to our internal [General privacy policy](#).

### **Fair treatment for an inclusive workplace**

In Ørsted, our goal is to create an environment where every employee is respected for who they are, appreciated for what they contribute with, and rewarded equally for what they achieve.

Upholding this commitment means we are devoted to supporting all employees, regardless of their background, status, or classification, to promote a workplace where all employees feel supported.

We are especially committed to assessing and bringing visibility to the perspectives of employees of marginalised identities. To support this vision, we have created and implemented Ørsted IN, a global inclusion network and dedicated channels, for anyone who identifies with a marginalised group, or serves as an ally who supports the equality and inclusion of such a group.

These networks are psychologically safe communities for members to share ideas, seek advice, and learn about inclusion of diversity. The current active networks are: Race and Ethnicity IN (to foster a more inclusive, ethnically diverse, and

multicultural Ørsted), Gender IN (to promote and build awareness of the value of gender equity), Disability IN (our inclusion network for people with disabilities (visible and invisible), chronic illness, mental health conditions, and those who are neurodiverse), LGBTQ+ IN (to make real and proactive progress on LGBTQ+ issues in the workplace), and 50 + IN (to create awareness, knowledge, and understanding of the working life and career of employees who have turned 50).

Moreover, we have an internal global policy on mental well-being applicable for all employees, aiming to 1) strengthen the mental well-being for Ørsted's employees, 2) prevent mental overload, such as work-related stress or anxiety, and 3) support fellow colleagues and people leaders in how to address such topics.

For further information on our Ørsted IN networks, please refer to our internal site [Ørsted IN](#).

For further information on our commitment to mental well-being, please refer to our internal [Global policy on mental well-being](#).

### Modern slavery

In Ørsted, we believe in the inherent dignity and freedom of everyone at work. This includes a commitment to eliminating all forms of forced or compulsory labour for our employees in line with internationally recognised human rights standards.

We ensure that all our employees are working for Ørsted on a voluntary basis, and not under threat of any penalty or sanction.

All employees can resign from Ørsted after giving notice in accordance with local legislation, collective agreement, or as negotiated in their individual employment contract. Accrued entitlements will be granted in accordance with country policies, guidelines, and local legislation.

All standard costs in relation to the recruitment process carried out by Ørsted or by a third party acting on Ørsted's behalf are paid by Ørsted. We or a third party acting on Ørsted's behalf do not require any form of recruitment fee or demand deposits, and we will not confiscate or withhold original documents concerning an employee's identity, such as passports, certificates, and diplomas, unless legally required under local legislation for a limited time frame to fulfil statutory employer obligations.

For more information on Ørsted's modern slavery act statements, please refer to our annual statements available externally [here](#).

### Verified right to work

Being a compliant and respectful employer, we ensure that all employees are legally authorised to work for Ørsted and possess the necessary visas, work permits, and other legal documentary requirements needed for the right to work, in accordance with national laws.

Records relating to the right to work, such as work permits, are maintained and stored as required by Ørsted subject to local legislation.

### Safe and inclusive working environment

In Ørsted, both physical and psychological safety and well-being are part of our culture, and we are dedicated to ensuring a safe and inclusive working environment where all employees can feel comfortable sharing as much of themselves as they choose, free from judgement or fear.

Diversity, equity, and inclusion are integral to our culture and the way we do business, and upholding our guiding principles means actively working to create a safe working environment that is free from bullying, discrimination, and harassment. Such behaviours are unacceptable, as all Ørsted employees deserve to be treated with dignity and respect. To support this, we have created and implemented a global bullying, discrimination, and harassment policy, supplemented with country-specific appendices.

For further information, please refer to our [Global bullying, discrimination, and harassment policy](#).



## Freedom of association

We respect our employees' rights to freedom of association and to join or refrain from joining labour unions and workers' councils without fear of discrimination, harassment, intimidation, retaliation, or violence in accordance with national laws.

Where the right to freedom of association and collective bargaining is restricted or prohibited under national law, we will not hinder employees from developing alternative mechanisms to express their grievances and protect their rights regarding working conditions and terms of employment.

We do not seek to influence mechanisms or activities of employee representatives while they carry out their functions in ways that are not disruptive to regular company operations.

## Engagement with employees or representatives

In Ørsted, we believe that we can only succeed as a business if all employees thrive, perform, and grow. We strive to create a culture where everyone is provided a psychologically safe space to bring up matters that are important to them. This includes being encouraged to express their views freely, including to colleagues above them in job position.

To support this, we send out an annual People Matter (satisfaction and motivation) survey to all employees globally. The People Matter survey gives insights anonymously about employees' perceptions of Ørsted as a workplace, their daily work, their people leader, senior management, and other areas which impact their working life. The survey results provide valuable insights to start a dialogue, and they form the basis for talking about which actions could be taken to further improve the workplace.

Furthermore, we have created a page on our intranet, Vital, describing different options for employee representation both on a global and local level, including other channels for employees to voice their opinion, such as HR business partners, a reporting system, and a whistleblower hotline.

For more information on employee representation, please refer to our internal [employee representation page](#).

## Social protection against loss of income

In Ørsted, we believe that we have a social responsibility to ensure that all our employees have the possibility to be covered by a retirement plan. We have an internal global policy on pension and insured benefits, which, among other things, outlines our ambition to provide our employees with the option of having a secure income during retirement.

Depending on local market practice, legislation and/or collective bargaining agreements, all our employees globally have the possibility to be covered by a state-funded pension/retirement scheme and/or a private pension scheme.

Furthermore, our internal global policy on pension and insured benefits also outlines our ambition to ensure that all our employees are covered by basic insurance benefits at employment, unless local market practice and/or statutory legislation state otherwise. This ambition includes that basic insured benefits must provide employees with the possibility of a minimum standard of living during sickness, long-term illness, or – in case of loss of ability to work or in the event of death – a fair compensation to surviving relatives. These benefits can be funded either via state- or private insurance schemes, depending on local legislation, market practice and/or collective bargaining agreements.

Finally, we have a strong focus on ensuring that all employees who experience periods of severe illness can get adequate assistance to ensure recovery. In addition, we strive to provide financial security for employees on sick leave to ensure that they maintain an adequate level of income by offering a country-specific number of paid sick days.

For further information, please refer to our internal [Global policy on pension and insured benefits](#).

## Grievances and complaints

In Ørsted, we have established appropriate and accessible mechanisms for our employees to raise labour- and employment-related grievances or complaints.

We have various grievance and complaint mechanisms in place which our employees can use for raising their concerns or complaints.

First, an employee can always go to their direct people leader for support.

Second, an employee can reach out to the People & Development organisation if they have a question or a concern via either:

- an HR business partner ([link](#))
- the local/regional People & Development experts ([link](#))
- the annual People Matter survey.

All employees have the right to make a complaint or raise a grievance without fear of retaliation.

If an employee wishes to report an instance of bullying, discrimination, or harassment, we have – in addition to the above – a global process, supplemented by country-specific appendices, where employees can contact People & Development to report their experience. Such cases are handled by trained P&D colleagues from People & Development.

For more information on the process for filing cases related to bullying, discrimination, and harassment to People & Development, please refer to our internal [bullying, discrimination, and harassment](#) Vital page.

All concerns and complaints raised to People & Development will be taken seriously and handled confidentially to the extent possible.

Third, the Ørsted Whistleblower Hotline can be used by employees, business partners and their employees, suppliers, customers, community stakeholders, and other stakeholder groups with an affiliation to Ørsted.

Through the Ørsted Whistleblower Hotline, whistleblowers are able to file a confidential report – including an anonymous option - on inappropriate and illegal conduct in the company.

All reports filed to the Whistleblower Hotline will be received and investigated by Internal Audit. Internal Audit is an independent function in Ørsted reporting directly to Ørsted's Board of Directors.

For more information on filing reports to the hotline, please refer to [Whistleblower Hotline](#).

### Country-specific guidelines and procedures

This policy may be supplemented by country-specific guidelines and procedures to ensure local implementation and compliance, e.g. country policies, guidelines, or employee handbooks.

If local laws require country-specific guidelines, these can be found in local employee handbooks or local guidelines on [Vital](#).

### Related policies

#### Internal policies

For further information on Ørsted's commitments, policies, and employee entitlements on a global and country-specific level, please refer to our internal [employment terms and policies](#) page.

#### Public policies

For further information on Ørsted's externally available policies, including information about our commitment to ensuring a sustainable, safe, and inclusive working environment for our employees as well as labour, employment, and human rights expectations, please refer to:

- [Ørsted Global human rights policy](#)
- [Ørsted Policy for quality, health, safety, and environment](#)
- [Ørsted Sustainability commitment](#)
- [Ørsted Good business conduct policy](#)
- [Ørsted Global working hours commitment](#)
- [Global bullying, discrimination, and harassment policy](#)

### Contact

If you have any questions or concerns regarding breach of this global policy, please contact the policy owner.

For questions or concerns of breach relating to specific employee arrangements and legal requirements in a specific location, please contact the People & Development country/region in the employee's country of employment. The country contact person can be found on the '[employment terms and policies](#)' Vital page under the country boxes for specific country terms and policies.

### Policy owner

This policy is owned by Global Legal & Terms in People & Development.

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**Ørsted**