

Ørsted Global Human Rights Policy

Introduction

Climate change is one of the greatest threats to humanity. As a result of rising sea levels, increasing temperatures, and extreme weather events, impacts on, for example, the right to health, food, water, and life are unavoidable.

Climate change will impact people disproportionately depending on where they live, how old they are, their social status, and their gender. It will also significantly impact workers within primary sector such as the rural and agricultural sectors, as they are particularly impacted by and vulnerable to climate change.

The negative impact on people and communities will be increasing exponentially depending on the degree of actual climate change taking place.

Ørsted's vision is to create a world that runs entirely on green energy. To succeed with this, we must lead a build-out that works for people.

In Ørsted, we see human rights as fundamental principles to protect people's dignity and ensure freedom and respect both in our own operations, with our business partners and in the communities, we are part of. And we believe they are foundational to enable a rapid and just green energy transformation.

It is therefore a priority for Ørsted to ensure that we identify, prevent, mitigate, and remedy any potential adverse human rights impacts either caused or contributed by, or directly linked to, our own activities and business relationships.

Purpose

This policy describes the way in which we respect human rights as described in relevant legislation as well as international standards and conventions. It also covers the principles for our governance and implementation of the policy, and it provides links to other Ørsted policies covering human rights related topics.

Stakeholders in scope

Ørsted's policy commitment covers our own employees as well as contractors, suppliers and other business partners globally, as well as communities and societies affected by our business activities.

Our corporate sustainability commitment

As a company, we commit to operating in a way that creates progress towards the UN Sustainable Development Goals (SDG). We are aware that the majority of the goals and targets of the SDGs correspond to human rights obligations.

To guide the way we work with sustainability, we adhere to the UN Global Compact principles. In our

Sustainability Commitment, we describe how we integrate this in our work within environment, labour and human rights, anti-corruption and bribery, economic development, and stakeholder dialogue.

Our human rights commitment

Ørsted is committed to respect human rights and we consider the UN Guiding Principles on Business and Human Rights as well as the OECD Guidelines for Multinational Enterprises as authoritative global frameworks that we commit to respect. They are key in the way we shape our work on ensuring a responsible business conduct.

In Ørsted, we are committed to meeting our responsibilities regarding key internationally recognised human rights standards. Also, we are committed to complying with local laws in every country we operate in. If there is a contradiction between international standards and local laws, Ørsted will comply with the highest standard.

We are committed to respect key international human rights standards and conventions such as:

- The International Bill of Human Rights
- The fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

This includes a commitment to ensuring:

- the freedom of association and the effective recognition of the right to collective bargaining
- the payment of decent wages enabling employees to meet their basic needs, and to provide adequate welfare protection
- the elimination of all forms of forced or compulsory labour
- the effective abolition of child labour
- the elimination of discrimination in respect of employment and occupation
- to respect indigenous people, minorities, and other vulnerable groups' rights in line with international law and standards as described in the UN Declaration on the Rights of Indigenous Peoples
- to respect land rights of legitimate tenure rights holders as set out in the UN Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests
- to not retaliate against human rights, environmental or indigenous defenders lawfully exercising their right to freedom of expression, association, peaceful protest or assembly, or protest, and regardless of whether they are

workers or community members affected by Ørsted operations.

Our human rights actions

We recognise our corporate responsibility to respect human rights. We seek to identify and prevent actual or potential adverse human right impacts that we may be directly or indirectly involved in through our business activities or business relations.

We do so by conducting regular human rights impact assessments of our own operations, of our supply chain, and of the projects we engage in prior to and during project construction. Through these assessments we develop and implement mitigating action plans and monitor their implementation and we communicate around our progress and impact.

With respect to supply chain human rights risks we have our Code of Conduct for business partners (CoC) which extends our human rights expectations towards suppliers and other business partners. Our Responsible Business Partner Programme (RPP) is developed to implement the CoC policy, and it is designed to meet, among other things, the expectations within the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

To support the implementation of the Global Human Rights Policy and other relevant policies we conduct periodical training and communication initiatives based on tailored content targeting different employee groups, reflecting their role and responsibilities. This is done to ensure that our employees understand what Ørsted human rights responsibilities are and how human rights issues can impact our business in both positive and negative ways.

Towards external stakeholders such as suppliers, we share information to explain our expectations on human rights and for selected suppliers, we provide capacity building activities based on risks and potential improvement gaps.

Remediation and grievance

We commit to providing or helping provide appropriate remediation to harmed individuals, workers, and local communities in situations where Ørsted has identified that we have caused or contributed to a negative impact through relevant judicial and non-judicial mechanisms. Our grievance and remediation approach includes to:

- remedy any adverse human rights impacts on

individuals, workers, and communities that Ørsted has caused or contributed to

- remedy adverse impacts which are directly linked to our operations, products or services through our suppliers' or business partners own mechanisms or through collaborating with our suppliers or business partners on the development of third party non-judicial remedies
- not obstruct access to other remedies and commits to collaborate in initiatives that provide access to remedy.

Any potential violation of the policy can be reported through our Whistleblower Hotline. The Whistleblower Hotline can be used by employees, business partners, suppliers' customers, community stakeholders, and other stakeholder groups with an affiliation to Ørsted.

All reports will be received and assessed by a special function within Ørsted's Internal Audit. Internal Audit is an independent function reporting directly to the Ørsted Board of Directors via the Audit & Risk Committee. Every case will undergo a proper investigation of facts and human rights experts will be engaged in the process.

Governance and approval

The Sustainability Committee oversees the Global Human Rights Policy, monitors its implementation, approves our human rights impact assessment on own operations and approves external HuR reporting.

The Sustainability Committee oversee external grievance cases and that impacted stakeholders receive an effective remedy. Internal grievance cases from own employees are handled within our internal management system.

The Sustainability Committee also approves the current Global Human Rights Policy which at all times will be publicly available on orsted.com

Related policies

In Ørsted, human rights expectations are also reflected in other policies.

These are:

- Code of Conduct for business partners
- Stakeholder Engagement Policy
- Policy for Quality, Health, Safety and Environment
- Global diversity & inclusion policy
- Global policy on bullying and harassment

*Daniel Lerup, CFO in Ørsted and chair of the Sustainability Committee
August 2023¹*

Questions regarding the Global Human Rights Policy can be raised to responsiblepartners@orsted.com

¹The Human Rights Policy was first approved by the Sustainability Committee in December 2021