

1.谁是我们在

Ørsted的愿景是一个依靠绿色能源的世界。Ørsted拥有、开发、建设和运营离岸和近岸风力涡轮机、太阳能、电力存储、生物能源厂和创新的废物能源解决方案。Ørsted UK专注于发展、建设和操作离岸风力涡轮机和废物能源解决方案。总部位于丹麦，Ørsted拥有6000名员工，其中1000名员工在英国。

为了实现我们雄心勃勃的绿色能源目标，我们与包括重型制造业、建筑和海事服务在内的多元化供应链合作。我们从欧洲的88%、美国的11.5%和亚洲的0.5%的总支出中采购。虽然这将改变，但我们继续在北美市场发展业务。

2.我们的行为准则和政策框架

作为全球绿色能源公司，我们旨在通过负责任、安全和正直地操作来解决人力贩卖和现代奴役的风险。我们制定了一个政策框架，确保我们和我们的供应商遵守高标准，尊重人权。

我们的业务诚信原则由联合国全球契约指导，我们自13年前签署以来一直遵守。我们还受到国际 conventions、原则和指导方针的指引，如联合国指导原则、业务和人权原则和OECD指导原则。

政策

我们的行为准则和合作伙伴的整体可持续性框架指导我们的员工和合作伙伴采取行动，识别并防止强迫劳动和人口贩卖在我们的运营和供应链中的活动。

行为准则和合作伙伴是我们的业务关系的重要组成部分，它被包括在所有合同中。我们充分承诺自己，遵守行为准则和合作伙伴的原则。

该行为准则和合作伙伴包括明确要求所有业务伙伴在雇佣实践、强制劳动和童工以及工作时间、薪酬、骚扰、虐待和纪律处分等方面遵守的条款。

2018年，我们更新了行为准则和合作伙伴，加强了对歧视、纪律处分和冲突影响的人权保障要求。
areas. The new Code of Conduct for Business Partners has been approved and published on our website.

Our Sustainability Commitment sets out our overarching policy on sustainability and defines how we commit to safeguarding and strengthening human rights. The company policy on Good Business Conduct promotes good business behaviour and encourages employees to speak up and report non-conformities with our own policies, and international and national laws. Our Human Resources policies and particularly the policy on Mitigation of Recruitment Risks, promotes an open and transparent recruitment process which minimises the risk of forced and trafficked labour within our own company.

Governance
Our Responsible Business Partner Programme is the primary delivery mechanism for analysing, identifying and mitigating the risk of modern slavery and human trafficking in our supply chains. The Programme works closely with our procurement functions and is governed by a Steering Committee which is comprised of representatives from senior level Group and Procurement functions. The Responsible Business Partner Programme is implemented by a dedicated team of professionals in close cooperation with the procurement team and other functions across the business, and reports on a biannual basis to the Compliance Committee, chaired by Ørsted’s Chief Executive Officer, on Key Performance Indicators.

The Responsible Business Partner Programme is an integral part of our programmatic approach to sustainability that addresses the societal challenges that we and our stakeholders believe are most material to our business. The Board of Directors is the highest authority that oversees our sustainability work, while the Group Executive Management has accountability for our sustainability programmes with specialist support from appointed committees.

Whistleblower hotline
An external provider manages our whistleblower hotline, which can be used by employees, business partners and any other stakeholder to report serious concerns in a secure and confidential way. All reports to the hotline are fully investigated and the report and any remedial action taken is presented to the Board of Directors.

3. Our due diligence and actions to identify and prevent modern slavery

Modern slavery is a risk to any business and its supply chains. To mitigate our risks, we have established systematic due diligence and screening procedures of our own operations and supply chains. Based on this work, we believe that our primary modern slavery risks are found in our supply chains.

In 2018, we expanded the scope of our green energy solutions to include onshore wind, solar energy and energy storage, while we also consolidated our presence in the USA and Taiwan. To reflect the potential prevalence of modern slavery risks in our new supply chains and markets, we strengthened our screening due diligence in three ways:

- We introduced a new due diligence approach to assess country risks for our new sourcing markets in Asia and North America. This included selecting 30 Verisk Maplecroft database risk indices, used to produce a rating on the overall risk of operating in any given country. The rating is combined with sector-specific knowledge and available human rights reports from organisations such as Amnesty International and Human Rights Watch, and in complex cases external social specialists are contracted.

- We continued our engagement and risk assessments of our offshore maritime wind power suppliers as it was identified as a risk category in 2017. Our screenings and on-site assessments have demonstrated a general good compliance with the Maritime Labour Convention and our Code of Conduct for Business Partners. Regarding other contracted maritime services, our vetting of vessels is supported by RightShip’s online screening platform to manage marine risks and eliminate substandard ships in our supply chain.

- We initiated a human rights impact assessment of our supply chain, which includes risk analyses of forced labour, human trafficking and other forms of modern slavery. This in-depth risk assessment is supported by an external human rights consulting company and will be concluded in 2019.

The Responsible Business Partner Programme implements a four-step process that combines risk screening and continuous improvement with our suppliers to mitigate any form of forced labour in our supply chain.

1. All Ørsted suppliers must accept our Code of Conduct for Business Partners as part of the contractual agreement. The Code of Conduct is therefore part of all contract templates in Ørsted.

2. Risk screening is carried out immediately after contract-signing taking into account the risk profiles associated with the country of production, the product or service category and the level of spend with the supplier.

3. High-risk and strategic suppliers are assessed against our expectations through questionnaires and site assessments where we review if they have policies, procedures and management systems in place to prevent forced labour, human trafficking, child labour and all other areas of our Code of Conduct for Business Partners.
4. If adverse findings or compliance gaps are found, we require our suppliers to develop and implement an improvement plan addressing areas of non-compliance to meet the expectations set out in our Code of Conduct for Business Partners.

This process is complemented by an extended 'Know Your Customer' screening of suppliers located in high-risk countries before contract signing which also include legal risks screening regarding corporate human rights abuses.

The Responsible Business Partner Programme also conducts an annual analysis of Ørsted ‘top 80% spend’ suppliers in order to identify potential strategic suppliers for further assessment and engagement. In addition, the programme produces periodic human rights impact assessments of our own operations and supply chains.

In addition, during 2018 we have strengthened our screening procedures and stakeholder engagement in three different ways:

- We have improved our standard supplier due diligence procedures in new markets for offshore wind power. This meant frontloading our screening and site assessment of suppliers to the pre-qualification stage to assess suppliers before contract signing. The site assessments in the Asia-Pacific region have demonstrated an overall good level of compliance with the business practices and standards that we require our business partners to agree to. If any non-conformities to our policies are identified, we have collaborated with our suppliers to put corrective action plans in place before contract implementation.

- We have participated actively in formulating Wind Europe’s internal industry principles for supply chains, and we participate in the Dutch initiative for Responsible Business Conduct for the Wind Power Sector.

- We have strengthened our active engagement in three multi-stakeholder collaboration and peer learning groups, which we see as important to continuously improve our ability to understand and address modern slavery risks. We participate in the Danish Ethical Trading Initiative’s working group on human rights impact assessments, the Global Compact Network Denmark’s working group on human rights and the European Responsible Sourcing Council hosted by The Conference Board.

4. Reporting and training

In 2018, the Responsible Business Partner Programme screened 248 suppliers. The programme made 24 comprehensive assessments and self-assessments of suppliers and opened 93 improvement actions, 37 of which concerned human and labour rights. These areas have been addressed in collaboration with the suppliers, and we monitor that corrective actions are implemented and documented.

We continue to strengthen our targeted employee awareness of the need to ensure that human rights are protected within our own business and within our supply chain, and of the need to enforce our Code of Conduct for Business Partners. In 2018, this was done through face-to-face training and other internal communication platforms. Our face-to-face training was targeted at procurement staff and included training on the risk of forced labour and modern slavery within our supply chain. Approximately 100 procurement staff were trained, which constitutes approximately 40% of all our global procurement staff.

Our Sustainability Report and ESC Performance Report are published annually and presents data and performance on all our sustainability programmes, including the Responsible Business Partner Programme.

This statement was approved by the Board of Directors of Ørsted Walney Extension Holdings Limited

Signed on behalf of the Board

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Benjamin Sykes
Director, Ørsted Walney Extension Holdings Limited
Date: 28 June 2019

3 Ørsted Policy Error! No text of specified style in document.
5. References

This statement relates to the financial year ending 31 December 2018. It is published by Ørsted A/S and covers the following UK entities:

- Burbo Extension Ltd
- Lincs Wind Farm Limited
- Ørsted Bioenergy & Thermal Power A/S
- Ørsted Burbo (UK) Limited
- Ørsted Burbo Extension Holding Ltd
- Ørsted Lincs (UK) Ltd
- Ørsted London Array II Limited
- Ørsted Power (UK) Limited
- Ørsted Power Sales (UK) Limited
- Ørsted Race Bank (Holding) Limited
- Ørsted Sales (UK) Limited
- Ørsted Solg & Service A/S
- Ørsted Walney Extension Holdings Limited
- Ørsted West of Duddon Sands (UK) Limited
- Ørsted Westermost Rough Limited
- Ørsted Wind Power A/S
- Race Bank Wind Farm Limited
- Walney (UK) Offshore Windfarms Limited
- Walney Extension Limited
- Westermost Rough Limited