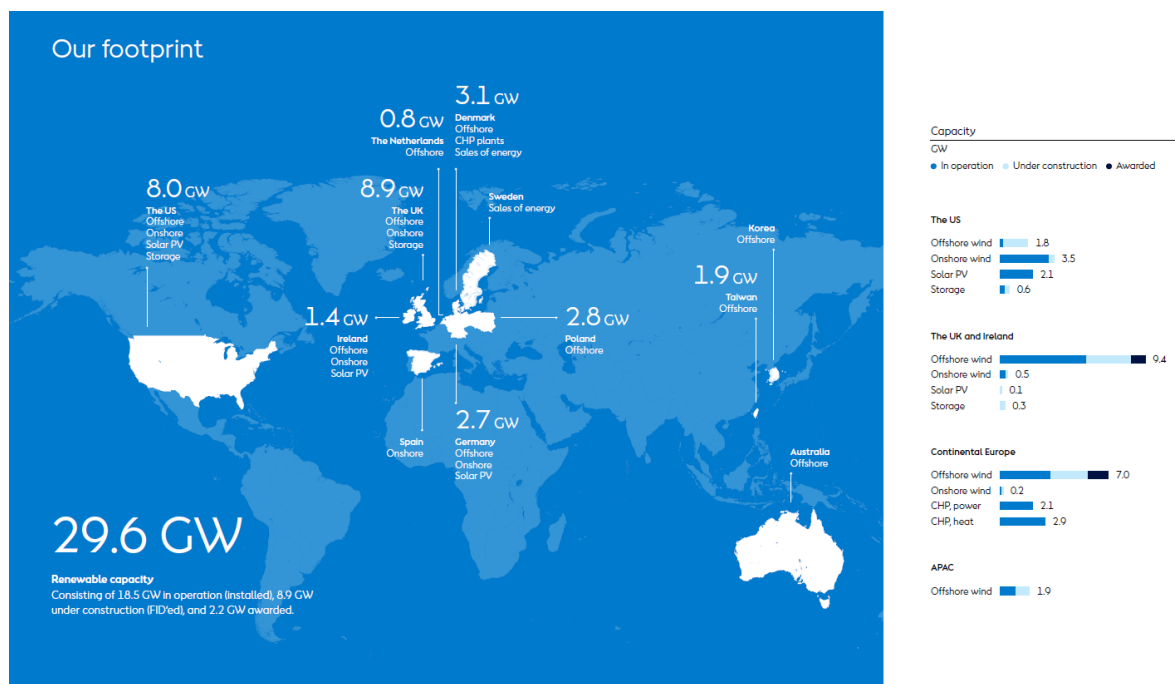


# Modern Slavery Act Statement 2025

## Our business and supply chain

Ørsted is a global renewable energy company with a leading position in offshore wind and a vision of a world that runs entirely on green energy. Founded in 2006 and publicly listed since 2016, Ørsted generated revenue of DKK 73.2 billion (GBP 8.5 billion) in 2025. The company is headquartered in Denmark and operates across Europe, the United Kingdom, the Americas, and Asia Pacific. At the end of 2025, Ørsted employed 7,896 people globally. Ørsted is advancing its strategic ambition with 18.5 GW of installed renewable capacity and a significant construction pipeline, with a strong operational footprint in key markets, including the United Kingdom.

Ørsted has suppliers across all major geographies and in 2025 suppliers were screened from 14 countries in Europe, 6 countries in APAC and one in North America. Suppliers span across categories that all have been risk assessed. High risk categories include e.g. foundations, cables, wind turbine generators, heavy lifting transmissions, and solar pv. Ørsted has built a sustainable and competitive supply chain to support our renewable energy project buildout. Working with the supply chain has enabled increased economic value to Ørsted, through technical innovation, job creation, exports, and local investment.



## Governance and policy commitment

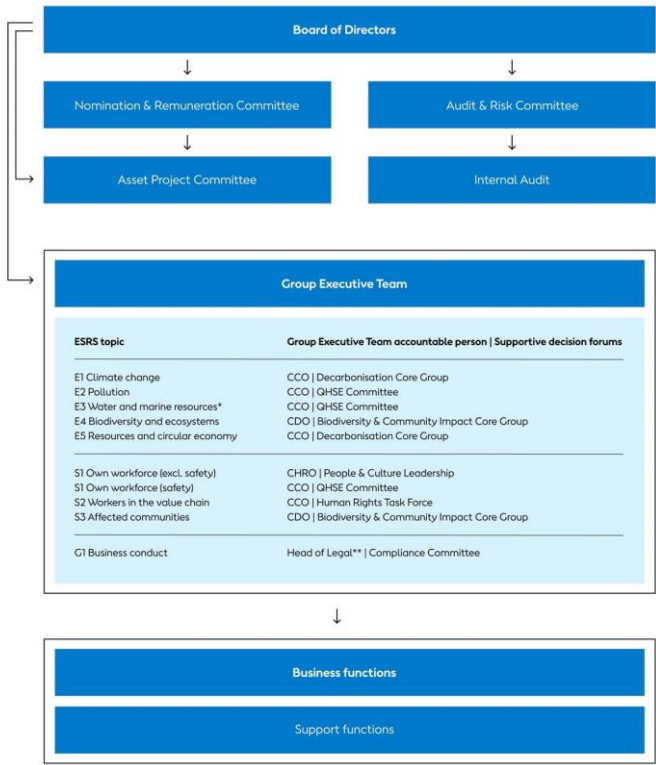
The Board of Directors is the highest governing body for sustainability. ESG and sustainability priorities are an integral part of the decision-making governance of the Board of Directors. The Board ultimately approves the sustainability strategy and targets and oversees our performance on material sustainability impacts, risks, and opportunities (IROs). The Board is presented with an annual progress update across material IROs, strategic sustainability priorities, and targets and has deep dives on sustainability topics, when needed.

In 2025, we further strengthened the integration of sustainability into our governance through a clarified structure with defined accountability at the Group Executive Team level. The Group Executive Team is responsible for setting the strategic direction and targets on sustainability, overseeing performance on

material impacts, risks, and opportunities, and driving progress through assigned ownership of key sustainability areas.

In 2025, we established a Human Rights Task Force to support the implementation of our human rights road map and further strengthen our due diligence systems, including alignment with the upcoming Corporate Sustainability Due Diligence Directive (CSDDD). The task force plays a key role in integrating human rights considerations into relevant business processes and management systems across the organisation.

The task force is cross-functional and includes the accountable Group Executive Team member alongside senior leaders representing key parts of Ørsted’s value chain, ensuring a value chain-wide approach to human rights due diligence and integration. From 2026, the task force will meet 2-4 times a year.



At the core of our approach is the Sustainability Due Diligence & Compliance team, established to develop and implement a management system approach that ensures that all business partners and suppliers is aware of Ørsted’s ethical, social, and environmental standards, as defined in our ‘Code of conduct for business partners. Also, the team ensures that a risk based due diligence process is implemented to identify actual and potential human rights and labour rights risks and that these are mitigated through collaborative improvement plans. The code sets out specific requirements and expectations related to human rights, labour conditions, anti-corruption, and environmental protection.

Various policies in Ørsted guide our approach to preventing and mitigating modern slavery and human trafficking in our operations as well as in our supply chain.

**The Ørsted Way** describes how Ørsted conducts its business, based on a vision of creating a world that runs entirely on green energy and a set of guiding principles, integrity, passion, teamwork, results, and safety. Ørsted’s **Sustainability commitment** includes adherence to the UN Global Compact, which covers the four areas of human rights, labour, environment, and anti-corruption, and supports sustainable development.

**The Global Human Rights Policy, Stakeholder Engagement Policy and Just transition policy** set our company's standards towards human rights, and transparent interactions as well as our commitment to live up to international standards.

Labour management in Ørsted is governed by our **Working hours policy, Global labour and employment rights policy, Global diversity & inclusion policy and Global bullying, discrimination, and harassment policy** ensuring a sustainable, safe, and inclusive working environment.

**The Good business conduct policy** helps our employees in their engagement with external stakeholders, whereas the **Code of Conduct for business partners** outlines the standards that we expect from our suppliers and business partners including our commitment to internationally recognised human rights frameworks. Ørsted's Whistleblower Hotline enables anyone working in Ørsted as well as stakeholders in our value chain to anonymously report any suspected breach of our policies and commitments.

### **Evaluating risks and actions**

Sustainability is integral to how Ørsted operates its business. We conduct a double materiality assessment (DMA) to identify and assess our impacts on the environment and society, as well as the sustainability-related financial risks and opportunities relevant to our business. This assessment captures material impacts across our operations and value chain, including risks related to workers and affected communities, such as modern slavery and human trafficking.

In 2025, we conducted a DMA, building on prior work and refining our methodology. In total, 31 impacts, risks, and opportunities (IROs) were identified as material, comprising 6 positive impacts, 15 negative impacts, 8 risks, and 2 opportunities. This reflects a consolidation from the previous year, where similar IROs were merged while maintaining the same overall material topics and thresholds.

The assessment confirms that the most material sustainability topics for Ørsted are climate change (E1), biodiversity and ecosystems (E4), resource use and circular economy (E5), affected communities (S3), workers in the value chain (S2), and own workforce (S1). The environmental IROs within E1, E4, and E5 are closely linked to our strategic focus on the build-out of renewable energy, while the social topics S1, S2, and S3 reflect the IROs associated with our operations and value chain, including labour conditions and community impacts.

Ørsted continues to identify human rights as a priority area across its value chain, recognising that risks such as modern slavery may arise particularly in upstream supply chains, labour-intensive services, and certain geographies. These risks are addressed through ongoing due diligence, supplier engagement, and targeted initiatives to strengthen transparency and responsible business conduct across our value chain.

### **Due diligence process**

For more than a decade, Ørsted has aligned its approach with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, embedding due diligence into procurement, operations, and engagement with local communities. Our approach is risk-based and anchored in accountability, transparency, collaboration, and proactive engagement across our value chain.

To identify, prevent, and mitigate adverse impacts, including those related to labour conditions and human rights, we implement a structured due diligence process for suppliers and business partners.

This includes risk screenings, extended risk screenings, and code of conduct assessments conducted both prior to and during business relationships. These processes are integrated into our procurement systems and support ongoing monitoring and improvement of supplier performance and adherence to our Code of Conduct for Business Partners.

Our due diligence process consists of four key steps:

1. **Commitment:** Suppliers commit to our Code of Conduct for Business Partners upon entering a contractual relationship with Ørsted.
2. **Risk screening:** We prioritise suppliers for further engagement based on country risk, category risk, and spend, using a risk-based approach.
3. **Assessment:** We assess suppliers' adherence to our requirements, including management systems and practices, through desk-based assessments and, where relevant, on-site evaluations.
4. **Improvement:** Where gaps are identified, we engage with suppliers to implement improvement plans and follow up through ongoing dialogue and monitoring to ensure effective remediation and continuous improvement.

### **Approach and processes for providing remedy**

Our approach to addressing concerns and grievances in our value chain is based on principles of transparency, trust, and effective remediation that is proportionate to the nature and severity of the issue. We continuously strengthen our processes to enable or contribute to appropriate remediation where we identify that we have caused or contributed to adverse human rights impacts, including those affecting workers in our value chain.

Workers in our value chain have access to the Ørsted whistleblower scheme, which allows confidential reporting of inappropriate or unlawful conduct. The scheme is available to both employees and external stakeholders, and all reported cases are handled and investigated, with substantiated issues addressed through appropriate follow-up actions.

In 2025, we continued to strengthen mechanisms for worker voice and grievance handling. This includes piloting a worker survey tool as part of our supplier engagement, enabling anonymous engagement with workers and providing insights into working conditions and potential risks in the value chain. These initiatives support our broader efforts to enhance transparency, identify potential adverse impacts, and ensure continuous improvement in how we address labour and human rights risks.

### **Effectiveness of engagement activities**

To monitor the effectiveness of our due diligence and supplier engagement efforts, we assess outcomes on an ongoing basis, including supplier performance, identified risks, and the implementation of improvement actions. These insights are used to strengthen our due diligence processes and support continuous improvement of working conditions in our value chain.

Responsibility for overseeing these processes is integrated into Ørsted's governance structure, with clear accountability across senior leadership and relevant functions. This ensures that outcomes from supplier engagement, including sustainability and human rights considerations, are embedded in procurement processes, category strategies, and broader risk management and compliance frameworks.

Our commitment to continuous improvement is supported by regular updates to our due diligence processes, methodologies, and governance structures, as well as alignment with evolving regulatory expectations, including the Corporate Sustainability Due Diligence Directive (CSDDD). This enables us to further embed responsible business conduct, strengthen transparency, and uphold high standards of integrity across our value chain.

**Risk screenings**

The number of screenings and due diligence activities conducted is influenced by the timing of individual construction projects, the maturity of supplier relationships, and changing procurement priorities.

In 2025, we conducted **311 risk screenings** based on country and category risk, alongside **39 extended risk screenings** incorporating additional risk parameters, including labour-related factors such as migrant workers and worker welfare considerations. The change in the number of screenings compared to the prior year reflects both project pipeline variations and a continued reliance on previously assessed suppliers that are subject to ongoing monitoring.

Know-your-counterparty (KYC) screenings are no longer reported as a separate metric, as this approach has been refined and integrated into our broader due diligence and compliance processes.

**Due diligence activities**

We carried out 12 CoC desktop assessments in 2025. This represents a decrease from 2024 and reflects our continued refinement of assessment methodologies and increased focus on higher-risk suppliers. The number of CoC site assessments increased slightly to a total of 6 in 2025, driven by targeted engagement in higher-risk areas. The number of desktop vessel inspections was 57, and the number of physical vessel inspections equalled 424. The changes reflect variations in offshore project execution and the number of vessels relevant for inspection, while maintaining a high level of oversight of maritime operations.

We also conducted HSE assessments as part of our supplier assessment and monitoring process, where the number of desktop assessments and on-site assessments decreased due to reduced project activities during 2025.

| Supply chain due diligence                                  |      |      |       |
|---|------|------|-------|
| Supply chain due diligence, number                          | 2025 | 2024 | Δ     |
| <b>Risk screenings</b>                                      |      |      |       |
| Risk screenings (all contracts above DKK 3 million)         | 311  | 344  | (10%) |
| Extended risk screenings                                    | 39   | 42   | (7%)  |
| <b>Due diligence activities</b>                             |      |      |       |
| Code of Conduct (CoC) assessments – desktop                 | 12   | 19   | (37%) |
| Code of Conduct (CoC) assessments – on-site                 | 6    | 5    | 20%   |
| Health, safety, and environment (HSE) assessments – desktop | 112  | 114  | (2%)  |
| Health, safety, and environment (HSE) assessments – on-site | 50   | 58   | (14%) |
| Vessel Inspections – desktop                                | 57   | 71   | (20%) |
| Vessel Inspections – physical                               | 424  | 429  | (1%)  |

**Training**

We use training and capability-building initiatives to support the embedding of responsible business conduct across our organisation and value chain. This includes targeted training programmes related to health, safety, and operational practices, as well as initiatives aimed at strengthening leadership capabilities and supporting effective management of risks.

Training also forms part of our broader approach to supplier engagement and risk mitigation, including initiatives focused on improving worker welfare and operational practices in relevant sectors. In 2025, the worker welfare group advanced its collective approach by facilitating cross-industry knowledge sharing and deepening engagement with key stakeholders in Singapore. A key area of progress was the launch of a pilot programme focused on delivering supervisor behaviour training. The two-day pilot

trained 39 supervisors and covered safety leadership, labour rights, respectful behaviour, and grievance management.

As part of Ørsted's onboarding, it is mandatory for all employees to complete the Good Business Conduct e-learning programme and in 2026 the Business Ethics Compliance and Sustainability Due Diligence and Compliance team will offer a wide training opportunity for procurement through a Learning Café.

### **Awareness building and collaboration**

Through collaboration with governments, industry associations, and other external stakeholders, Ørsted works to address sustainability-related risks across our value chain, including human rights risks, and to support the development of responsible practices in the renewable energy sector. These collaborations enable knowledge sharing, alignment with emerging regulatory requirements, and support continuous improvement of our due diligence processes.

We engage with a range of industry initiatives and organisations to strengthen responsible business conduct and value chain transparency. This includes collaboration with initiatives focused on responsible sourcing, worker welfare, and industry standards, such as the Initiative for Responsible Mining Assurance (IRMA), International Responsible Business Conduct (IRBC) initiatives, Ethical Trade Denmark, including the Danish Alliance for Responsible Green Energy, and industry-specific platforms that support the development of common methodologies, supplier engagement practices, and responsible supply chains.

These collaborations contribute to addressing systemic risks in the renewable energy value chain, including risks related to labour conditions, and support Ørsted's ongoing efforts to integrate human rights due diligence into our business processes and supplier engagement activities.

### **Looking ahead**

We continue to strengthen our efforts to identify, address, and mitigate human rights risks, including risks related to modern slavery and human trafficking, across our value chain.

Looking ahead, we will further embed and enhance our human rights due diligence approach through continued implementation of our human rights road map and the work of our Human Rights Taskforce. From 2026, the taskforce will meet 2–4 times a year to support the integration of human rights considerations into relevant business processes and management systems, with a continued focus on alignment with the Corporate Sustainability Due Diligence Directive (CSDDD).

We have also taken a final decision to implement an external supplier screening platform to strengthen our risk identification capabilities. The platform will enable enhanced monitoring of supplier risks across geographies and categories, support early identification of potential adverse impacts, and improve data-driven insights to inform our due diligence and supplier engagement activities. In parallel, we will continue to strengthen operational due diligence and reporting oversight to ensure clearer accountability and more consistent tracking of risks, actions, and outcomes across our value chain.

We will also continue to strengthen supplier engagement and risk-based due diligence processes, including ongoing development of tools and methodologies to improve transparency and monitoring of working conditions in our value chain. This includes further use of initiatives such as supplier assessments and worker engagement mechanisms to enhance insight into risks and support continuous improvement. In 2026, we will also advance our worker welfare concept, working together with relevant peers and external stakeholders to address systemic and structural issues related to migrant and recruited workers in relevant APAC markets.

In addition, we will update our corporate-wide human rights impact assessment to identify and prioritise the most salient human rights issues for Ørsted, helping to guide our focus and due diligence efforts in the coming years.

Through these efforts, we remain committed to continuously enhancing our due diligence approach in line with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines, with a focus on effective risk management, stakeholder engagement, and continuous improvement.

**This statement relates to the financial year ending 31 December 2025.**

The organisations covered by this statement are the following<sup>1</sup>:

Breesea Limited  
Burbo Extension Holding Ltd  
Burbo Extension Ltd  
Burbo Extension PSC Limited  
Gunfleet Sands Holding Ltd  
Gunfleet Sands Limited  
Hornsea 1 Holdings Limited  
Hornsea 1 Limited  
Hornsea 1 PSC Limited  
Hornsea Two Holdings Ltd  
Hornsea Two PSC Limited  
Lincs Wind Farm (Holding) Limited  
Lincs Wind Farm Limited  
Orsted (UK) Limited  
Orsted Burbo (UK) Limited  
Orsted Lincs (UK) Ltd.  
Orsted Orion Holdings Limited  
Orsted Power (Gunfleet Sands) Ltd  
Orsted Power (UK) Limited  
Orsted Race Bank (Holding) Ltd.  
Orsted Schroders Greencoat WODS Holdco Limited  
Orsted UK BBExt Holdings Limited  
Orsted UK HOW01 Holdings Limited  
Orsted UK HOW02 Holdings Limited  
Orsted UK WalExt Holdings Limited  
Orsted Westermost Rough Limited  
Race Bank Wind Farm (Holding) Limited  
Race Bank Wind Farm Limited  
Sonningmay Wind Limited  
Soundmark Wind Limited  
Walney (UK) Offshore Windfarms Limited  
Walney Extension Holdings Limited  
Walney Extension Limited  
Walney Extension PSC Limited  
Westermost Rough (Holding) Limited  
Westermost Rough Limited  
Ørsted Wind Power A/S  
Ørsted Salg & Services A/S

This statement was approved by the Boards of Directors of the Ørsted companies mentioned above.

Signed on behalf of the Boards.

**Benj Sykes**  
Head of Region UK

24 June 2026

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<sup>1</sup> Entities divested during the reporting period are included insofar as they formed part of Ørsted during the financial year.