

# List of Signatures

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# Global Statement on Modern Slavery

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Statkraft presents its statement made pursuant to Section 54(1) of the UK Modern Slavery Act 2015 (the “Act”). This statement describes the steps taken by Statkraft with a view to preventing and combatting modern slavery in our business and our supply chain. Statkraft AS, Bryt Energy Limited, Statkraft UK LTD and Statkraft Markets GmbH, which maintains a branch in the UK, are the relevant reporting entities for the purposes of this statement.

## About Statkraft

Statkraft AS, a Norwegian state-owned enterprise, is the parent company of the Statkraft Group. The Group produces hydropower, wind power, solar power and gas-fired power and is a global player in energy market operations. By providing renewable and sustainable energy solutions, Statkraft carries out activities that support a global transition towards a low-carbon climate-resilient economy. Statkraft has over 6 000 employees in 20 countries.

More information can be found on Statkraft's [website](#).

## Alignment with human rights standards

Statkraft is committed to sustainability and responsible business practices. Our conduct is guided by the OECD Guidelines for Multinational Enterprises, relevant supporting materials, and the UN Guiding Principles on Business and Human Rights (UNGPs). We comply with the Norwegian Transparency Act and sustainability-related EU directives, including the Corporate Sustainability Reporting Directive, and we use the IFC Performance Standards to inform new business activities. Statkraft is also a member of the UN Global Compact and takes part in several industry initiatives and networks.

We actively engage in industry and multi-stakeholder platforms focused on human rights, including the Nordic Business Network for Human Rights, the Wind Energy Initiative, and the Solar Stewardship Initiative.

## Corporate policies related to modern slavery

Statkraft's commitment to combating modern slavery is anchored in the [Code of Conduct](#), the [Supplier Code of Conduct](#), and internal sustainability and human rights management requirements. Together, these documents outline Statkraft's expectations of employees, suppliers, and business partners, and set out procedures for preventing, identifying, and mitigating risks of forced labour, child labour, and human trafficking.

Statkraft's Code of Conduct states the company's commitment to respect internationally recognised human and labour rights, including the elimination of forced and compulsory labour, child labour, and discrimination. It commits Statkraft to provide decent working conditions, adequate wages, and ensure no worker ever pays recruitment fees or other compensation in order to work for Statkraft.

The Supplier Code of Conduct sets clear requirements for suppliers aimed specifically at preventing modern slavery. Suppliers must ensure that all work is freely chosen, employees' freedom of movement is unrestricted, no deposits or identity documents are withheld, and no worker pays recruitment fees. Suppliers must also ensure compliance with minimum age requirements, prohibit hazardous work for anyone under 18, and provide remediation that prioritises the child's best interests if child labour is identified. The Supplier Code further requires decent labour conditions, written employment contracts in a language workers understand, and compliance with the ILO core labour standards.

Beyond these commitments, Statkraft has established additional processes to assess and manage human rights risks across its operations and supply chain. Requirements for human rights due diligence, risk and impact assessments, and mitigation planning are embedded in Statkraft's sustainability management systems. These include measures to identify, prevent, mitigate, or remediate labour rights risks—including modern slavery—across projects, assets, and business partner relationships. Statkraft also requires effective worker feedback and grievance mechanisms at sites,



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enabling workers to raise concerns confidentially, including concerns relating to modern slavery. Statkraft also has a corporate commitment to ensure living wages are paid to Statkraft employees and required for supply chain workers at Statkraft sites

## Sustainability in supply chain management

Statkraft continuously works to improve how sustainability is integrated in procurement practice and seeks to avoid buying from suppliers linked to severe negative impacts on people, society, and the environment. Sustainable supply chain management is an integrated part of the procurement process. Statkraft takes a risk-based approach aiming to identify, prevent, mitigate, and account for actual and potential adverse impacts on human rights in our supply chain.

Statkraft's standard procurement contracts include sustainability clauses, a prohibition on the use of forced labour and an expectation on suppliers to comply with the requirements set out in Statkraft's Supplier Code of Conduct. Additional contractual requirements are applied where specific risks have been identified to secure appropriate mitigation and follow-up.

During the procurement process, suppliers respond to relevant questions on human rights, health and safety, working and employment conditions. All suppliers are integrity checked using third party screening software and suppliers with any clear indications or clear suspicions of severe human rights adverse impacts are subject to a review and approval process administered by our Corporate Compliance team with support from our Corporate Sustainability function. Supplier reviews are limited in validity and are periodically updated in accordance with a risk-based model.

Statkraft maps human rights and other sustainability risks inherent in our key technologies – hydropower, wind power, solar power and battery energy storage – and by reference to the specific regions that suppliers operate in. The procurement team address identified risks in the tender phase, and contracts are adapted to address specific risks and to include obligations to mitigate such risks.

Statkraft implements a 'Sustainable Supplier Program' with selected suppliers to develop an understanding of how they identify, prevent, mitigate, and account for potential adverse human and labour rights impacts in their own business and supply chains. Dialogues are held throughout the year with selected suppliers to improve transparency and share best practice to avoid negative impacts on people, society and the environment or to introduce opportunities for improvement. Another tool relevant to development of strategic suppliers on sustainability topics is EcoVadis which Statkraft uses to gather insights on some potential suppliers and to monitor progress and corrective actions of strategic suppliers over time.

Statkraft's Group Procurement has a dedicated Sustainable Procurement team who are responsible for developing and maintaining policies and requirements, contract templates and frameworks for the management of sustainability in the supply chain. The unit provides training on sustainability to procurement personnel across Statkraft and cooperates closely with category and contract managers.

## Our supply chain

Most of Statkraft's procurement activities are related to equipment and services for production of electricity and construction of powerplants. The supplier base is diverse and includes more than 14 000 suppliers world-wide, including small and large suppliers from sectors such as the electromechanical industry, civil construction, business consulting and engineering as well as suppliers of equipment, e.g. hydropower turbines, high voltage transformers, PV modules, wind turbines, battery energy storage systems etc. Some suppliers are small local companies with short supply chains, while others are global industrial groups with long and complex supply chains stretching across different geographies.

The supply chain for equipment used for power production stretches internationally from mining of minerals, production of metals, manufacture to assembly of components, including the transportation between sub-suppliers, sometimes located across different continents. Generally, the inherent human and labour rights risks associated with renewable energy supply chains is highest in the extraction and processing of minerals and in the manufacturing industry in certain countries. Renewable supply chains (especially at the sub-supplier and materials level) are largely dominated by Chinese companies, and certain materials (in particular polysilicon, aluminium and processing and refining of lithium and graphite) have been linked to concerns over the treatment of the Uyghur minority people in the Xinjiang region in China, including allegations of forced labour.

Statkraft strongly opposes the use of forced labour and seeks to avoid purchasing from companies that use forced



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labour by emphasising human and labour rights commitments at each stage in the procurement process, and through specific traceability measures and chain-of-custody audit rights to verify adherence to our requirements. Further, Statkraft works with industry associations and peers to raise awareness, increase transparency, and improve industry standards through relevant sector initiatives including the Wind Energy Initiative and the Solar Stewardship Initiative.

The supply chain is relatively short for business consulting and engineering, and the work is usually performed by suppliers in countries where Statkraft is located. Statkraft considers the risk of forced labour and modern slavery in these supply chains to be low.

Statkraft acknowledges that there is an inherent risk of unreasonable working time, inadequate leave periods and wages below living wage for workers during construction and installation at our sites.

## Update on progress

During 2025, Statkraft has continued to work proactively to understand and address the potential risks of modern slavery (including forced labour) in our supply chains for key technologies. Ongoing risk management and improvement measures in 2025 have included:

- Engaging with strategic suppliers to strengthen transparency and traceability, including conducting traceability audits and other enhanced due diligence activities for deliveries where inherent risks of forced labour are identified—particularly in solar, wind, and BESS component supply chains.
- Enhancing qualification processes for relevant suppliers, including strengthened human rights and environmental risk checks and the use of external sustainability assessment tools such as EcoVadis to support supplier evaluation and monitoring.
- Continuing work to secure framework agreements with vertically integrated suppliers, in order to improve visibility and control over upstream supply chains where mineral and metal sourcing may pose heightened human rights risks.
- Implementing improvements to our supplier due diligence and risk management processes, including:
  - a revised Dow Jones process requiring second level approval for high-risk suppliers,
  - classification of suppliers into low, medium, and high risk based on inherent sustainability risks associated with Statkraft's key technologies,
  - and applying strengthened mitigation measures such as extended desktop reviews, external investigations, site visits, and enhanced contractual requirements for high-risk suppliers.
  - Developing and implementing targeted measures to address forced labour risks in key technologies, including:
    - traceability requirements and audits for Solar PV modules,
    - a new process to identify and understand forced labour risks in manufacturing of wind turbine components and battery cells for BESS, and
    - promoting sourcing of minerals and metals from certified mines.
- Advancing collaboration with industry and multi stakeholder initiatives—including WindEurope, SolarPower Europe, the Solar Stewardship Initiative, the Wind Energy Initiative, and the International RBC Agreement for the Renewable Energy Sector—to better understand sustainability risks, including forced labour and drive sector-wide improvements in transparency, traceability, and responsible sourcing.
- Strengthening supplier engagement through the Supplier Sustainability Programme, including dedicated dialogue on human and labour rights risks and ongoing assessment of suppliers' performance and improvement needs.

Other improvement measures during 2025, related more broadly to labour rights on Statkraft sites, have included progressive implementation of our living wage commitment for on-site supply chain workers and efforts to ensure decent working conditions on our sites. A more comprehensive update of Statkraft's progress and improvement measures during the course of 2025 can be found in our 2025 Annual Report, see S2, Value chain workers.



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This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Statkraft reporting entities' slavery and human trafficking statement for the financial year ending 31.12.2025.

**Birgitte Ringstad Vartdal**  
President and CEO of Statkraft  
4 March 2026

**Alexandra Bech Gjørv**  
Chair of Statkraft's Board of Directors  
4 March 2026

This Statement was approved by the Board of Directors on 4 March 2026.



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