Firebolt RB Holdings Limited: Modern Slavery Statement

This statement is published in accordance with the UK Modern Slavery Act 2015. It sets out the policies, procedures and actions taken by Firebolt RB Holdings Limited ("Firebolt" or "the Company") in 2021 to prevent, detect, and respond to the risk of modern slavery and human trafficking in all its forms.

Organisation structure, business and supply chains:

Firebolt is a holding company which owns a 50% interest in Race Bank Wind Farm (Holding) Limited, which itself owns Race Bank Wind Farm Limited. The remaining 50% interest is owned by a wholly owned UK subsidiary of Ørsted A/S ("Ørsted").

Firebolt purchases its pro-rata share of power and associated benefits (for example, Renewable Obligation Certificates) from Race Bank Wind Farm Limited ("Race Bank"), which owns a 573MW offshore wind farm located 27km north of Blakeney Point off the coast of Norfolk, and 28km east of Chapel St Leonards off the Lincolnshire coast in the North Sea. The wind farm was commissioned in February 2018.

Firebolt has no other source of income and has no employees. Race Bank is operated by Ørsted, and all the power and associated benefits purchased by Firebolt are also sold to Ørsted.

Policies and staff training relating to slavery and human trafficking:

There are no employees at the Company – Race Bank has contracted with Ørsted to provide all operation and maintenance services, including all staff and any third-party subcontractors required.

The board of directors of Firebolt has reviewed the Modern Slavery Statement of Ørsted A/S, a copy of which is annexed and confirm they are satisfied it meets the requirements under the Modern Slavery Act.

Firebolt is committed to regularly monitoring the policies and practises at Race Bank to meet its commitment to compliance with the Modern Slavery Act.

Due diligence processes and risk assessment and management:

The Company does not itself contract directly for any operational activities related to the wind farm– Race Bank has contracted with Ørsted to provide all operation and maintenance services, including all staff and any third-party subcontractors required.

The board of directors of Firebolt has reviewed the Modern Slavery Statement of Ørsted A/S, a copy of which is annexed and confirm they are satisfied it meets the requirements under the Modern Slavery Act.

Firebolt is committed to regularly monitoring the policies and practises at Race Bank to meet its commitment to compliance with the Modern Slavery Act.

This Modern Slavery Statement has been approved by the Board of Directors of Firebolt in order to comply with the provisions of the Modern Slavery Act for the financial year ending 31 December 2021.

Ørsted

Modern slavery act statement 2021



This statement is published pursuant to Section 54(1) of the UK Modern Slavery Act 2015 for all relevant Ørsted entities covered by the provisions of the Act.

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We want to create a world that runs entirely on green energy – in a way that works for the planet and its people.

Mads Nipper
CEO Ørsted

1. Our organisational structure and supply chain

Ørsted started its operations in 1972 as a state-owned company in Denmark and has since then, grown to become an international company with operations across Europe, Asia, and North America. Ørsted develops, constructs, and operates offshore and onshore wind farms, solar farms, energy storage facilities, and bioenergy plants and provides renewable energy products to its customers. From being a highly carbon-intensive company, Ørsted has been recognised for four years in a row for being the most sustainable energy company in the world.

Ørsted works with a diverse set of suppliers. Our suppliers vary in complexity with differing sustainability risks. We aim to decarbonise our own energy generation and operations as well as within our supply chain. We have set a target to decarbonise our full value chain towards net-zero emissions by 2040. This requires Ørsted to work even more closely with our supply chain to achieve our common goal.

The global build out of green energy impacts the lives of people across renewable energy supply chains and the communities impacted by green energy projects. In Ørsted, we are determined to lead a green transformation that works for the people by ensuring that associated sustainability risks are abated.

Our operations
Ørsted currently employs over 6,800 people globally in Europe, Asia Pacific, and the Americas, with approximately 1,100 employees in its UK operations. The UK leads the world in offshore wind deployment and is home to the world's largest operational wind farm, Hornsea 1. Ørsted acquired significant volume of onshore wind power projects in 2021 in Ireland and the UK. In the UK operations, new avenues such as renewable hydrogen and energy storage are being explored to increase our portfolio of renewable energy sources.

2. Our policies and governance in relation to modern slavery

In Ørsted we release our annual sustainability report to communicate our sustainability priorities and the various programmes that are set up to implement them. We currently have 19 sustainability programmes that address the most important sustainability themes to our stakeholders and our business.

Three of the programmes: our Human Rights Programme, our Responsible Business Partners Programme, and our Metals and Minerals Programme, directly or indirectly address the risks of human trafficking and modern slavery.

> **We seek to identify and prevent actual or potential adverse human rights impacts that we may directly or indirectly be involved in through our business activities or business relations.**
>
> **Human Rights Policy**
> Ørsted

We are guided by our strategic commitment to the UN Sustainable Development Goals, the United Nations Global Compact's (UNGC) principles for corporate sustainability, the United Nations Guiding Principles for Business and Human Rights, and the OECD Guidelines for Multinational Enterprises in addition to other internationally recognised conventions.

The Board of Directors and the Executive Committee prioritise Ørsted's strategic direction on sustainability topics. The Sustainability Committee within Ørsted, chaired by the CFO, ensures adherence to the Sustainability Commitment as well as reviews the sustainability strategy and the performance of the various sustainability programmes. The Global Sustainability department within Ørsted is responsible for developing and implementing the strategy and successfully executing on the various sustainability programmes, together with relevant functions across the business.

The Responsible Business Partners Programme (RPP) develops and drives the human rights approach and responsible procurement practices in our own operations and within our supply chain in close collaboration with relevant stakeholders. The RPP team reports to our ESG Supplier Due Diligence Steering Committee which provides strategic direction to ESG risks within our supply chain. In 2021, Ørsted developed a Human Rights Policy that focusses on respecting international standards and setting requirements to bolster them and our commitment within our operations. Further, we have also updated the Code of Conduct for Business Partners which sets the performance standards that Ørsted commits to and extends such expectations to our business partners.

Ørsted has a Good Business Conduct policy that provides guidance to all employees on business conduct both within the organisation and with our stakeholders and business partners. In case employees in Ørsted are aware of any inappropriate and illegal conduct, they are encouraged to report this via our internal channels to the management or the compliance officers. However, to ensure a confidential channel for our employees to report such conduct and to allow our external stakeholders to report such concerns as well, the Ørsted whistleblower hotline is made available both internally and externally.

3. Due diligence and how we approach risks in our business and supply chain

The human rights risks and sustainability landscape is dynamic. To ensure Ørsted has adequate awareness of inherent human rights risks in the business, the RPP team engages with the different parts of the business and stakeholders to identify any underlying challenges. Over the years, Ørsted has implemented a systematic approach to identifying and tackling human rights risks within our supply chain by employing a four-step due diligence process detailed in the illustration below:

During 2021, we further strengthened our approach towards due diligence by implementing the following:

- **Piloting a worker interview approach** with a focus on working conditions for migrant workers. The next step is to roll this out as part of our due diligence process for relevant high-risk suppliers.
- **Setting up a due diligence process for Onshore (business unit) suppliers** with a focus on the risk exposure and the business process.
- **Updating our due diligence procedure for biomass suppliers and trading intermediaries** to ensure suppliers are screened on topics which are not covered by certification requirements but has a labour and human rights implication.
- **Expanded the scope of partner due diligence process** which evaluates our JV partners, M&A partners and commercial partnerships on anti-corruption & bribery, credit risk and sustainability to also cover branding aspects in order to better understand counterparty risks within the social and ethical spectrum.

Due Diligence Programme in Ørsted

Acceptance

Sustainability requirements are an integral part of all contracts via an appended Code of Conduct. This sets clear requirements and expectations for our business partners relating to, forced labour, slavery, and similar practices.

Screening

Know your counterparty: All counterparties with a contractual commitment above GBP 20,000 are screened prior to contract signing to identify and mitigate legal and compliance risks within the areas of our Good Business Conduct Policy.

CoC Screening: An RPP screening is conducted focussing on country, category, and contract value to identify relevant high-risk suppliers related to our Code of Conduct

Assessment

Code of Conduct assessments are conducted in high-risk markets prior to contract signing to evaluate suppliers' adherence to Ørsted's Code of Conduct. In other markets, assessments are conducted after contract signing. Such assessments are conducted on a periodic basis.

Monitoring

Evaluated business partners are provided areas of improvement and defined deadlines for closing gaps on topics in our Code of Conduct. Further, all counterparties are also monitored for adverse media hits on an ongoing basis via the screening tool.

4. Key risks identified within own operations and our supply chain

During the previous years, we have had a focus on migrant workers, their accommodation (dormitories), and the retention of personal documentation of workers leading to the inability to move around freely. The RPP team has a special focus on these topics and ensures an ongoing dialogue with the relevant high-risk suppliers to bridge the gaps and ensure workers are treated fairly and with dignity. Further, we have identified four key topics that have had special focus due to the human rights risks associated with them:

a. Our approach to metals and minerals sourcing

The renewable energy build-out requires increased use of certain minerals and metals. A significant share of these minerals and metals comes from countries or regions which have an increased risk of adverse social impacts. During 2021, Ørsted set up a sustainability programme to address the impacts of the extraction and production of these minerals and metals on human rights. We have identified ten priority metals in our supply chain, and we are engaging with key first-tier suppliers to align expectations with the OECD Guidelines and to help shape solutions in creating transparency as well as responsible mining practices.

b. Sourcing of solar panels

Ørsted has been growing in the renewable energy sphere, and we have expanded our activities within solar power projects. In the solar sector, selected materials and technologies used in solar panels have been linked to potential forced labour risk. Ørsted is committed to ensuring that there are no forms of forced labour within our supply chain. We have consequently strengthened our contractual language for solar panel suppliers, initiated a feasibility study to establish supply chain traceability, started joint screenings with an external service provider and conducted assessments of key solar panel suppliers. These steps are taken to avoid sourcing solar panels tied to forced labour and to ensure compliance with new forced labour regulations in key markets.

c. Crew on board vessels

In 2021, many of Ørsted's employees and our suppliers' workers experienced prolonged stays on vessels, as crew changes in some geographies were hindered by government restrictions due to COVID-19. In Taiwan, a cross-functional task force was set up to handle the issue and engage with the regulatory bodies. Due to an increased administrative workload for the Centre for Disease Control (CDC) in Taiwan, delays occurred in the processing of applications for employees to disembark.



This issue has been discussed on an ongoing basis with the government to ensure timely crew changes as well as to lessen the restriction. Due to lessening restrictions with respect to COVID-19, this risk is not seen as significant going forward, but it will be monitored on an ongoing basis.

5. Consultation and collaboration

In order to create a transparent and ethical supply chain, Ørsted seeks to work with various industry initiatives, peers, and other relevant organisations. Ørsted has been a member of the UN Global Compact (UNGC) since 2006 and is committed to implementing the ten principles of the UNGC. We are continuing our participation in the Danish Ethical Trade Institute, and the Global Compact Network Denmark. As part of our participation in the Wind Europe Sustainability Working Group, we have helped develop a self-assessment questionnaire for supplier Code of Conduct due diligence alongside peers in the wind industry. This was done to reduce the due diligence burden on suppliers and improve transparency in the supply chain. During 2021, we further committed to the following additional initiatives to strengthen our commitment to handling and addressing the human rights risks faced within the industry:

a. Solar Industry Forced Labor Prevention Pledge
This is an industry-led initiative established in February 2021 by the Solar Energy Industry Association. They are committed to helping ensure that the solar supply chain is free of forced labour. A core element in this is the development of an industry-led solar supply chain traceability protocol to identify the source of primary raw materials and track their incorporation into the solar modules.

b. Solar Power Europe
Ørsted joined this member-led association for the European solar PV sector to create the right regulatory and business environment to allow for the unprecedented expansion within this sector.

c. Initiative for Responsible Mining Assurance (IRMA)
Ørsted has joined this cross-industry initiative to promote responsible mining practices in our supply chains and learn best practices from industry leaders.

6. Tracking progress and effectiveness

During 2021, the Board of Directors and Executive Committee decided to further strengthen our approach to work on material social sustainability themes. This is being performed by mapping our challenges and opportunities related to the impact we have on people through our operations and projects. Based on the materiality of these challenges, 10 key themes have been prioritised to ensure that we improve the lives of people by placing them at the heart of the energy transition and partnering with local communities.

Ørsted publishes due diligence numbers on a quarterly basis as part of the ESG performance report. In 2021, we conducted 326 risk screenings, which is an 8 % increase from 2020. This covered 80 % of the total procurement spend. Further, 75 extended screenings were conducted focussing on the category of the spend and the country of operation. Desktop assessments and site assessments numbered 31 and 1, respectively, which reflects a decrease in high-risk contracts and the COVID-19 pandemic causing an inability to conduct site visits. As the restrictions related to COVID-19 lessen, we expect to resume onsite assessments on our suppliers and other relevant business partners.

A Good Business Conduct eLearning course is part of Ørsted's onboarding process for new employees and it is provided as a refreshment training on a biannual basis for all other employees. This gives guidance to employees on Ørsted's expectations with respect to their behaviour both within the organisation as well as when dealing with external parties. Further, targeted training sessions are conducted for procurement professionals at the time of onboarding on the risks we see in the supply chain and how they can work to address them as an integrated element of Ørsted's due diligence programme. Further, ad-hoc training sessions are conducted for those teams that have a higher risk exposure.

7. Looking ahead

As part of the previous MSA statement, we had committed to creating dedicated policies addressing human rights and extending expectations within our supply chain on key risks relating to modern slavery and human trafficking. These policies have been approved and during 2022 we aim to communicate and strengthen their implementation within our own operations and with our suppliers. Further, we will strengthen our communication efforts based on upcoming human rights impact assessments and other human rights risks prevalent in the industry we operate in.

This statement was approved by the Boards of Directors of all relevant[1] Ørsted companies.

Signed on behalf of the Boards

Duncan Clark
Head of Region UK
25 June, 2022



1. Applicable Ørsted companies is included on page 8

Ørsted

This statement relates to the financial year ending 31 December 2021.

The organisations covered by this statement are the following:

- Barrow Offshore Wind Limited
- Burbo Extension Ltd
- Hornsea 1 Limited
- Lincs Wind Farm Limited
- Orsted Burbo Extension Holding Ltd
- Orsted Burbo (UK) Limited
- Orsted Hornsea 1 Holdings Limited
- Orsted Lincs (UK) Ltd
- Orsted London Array II Limited
- Orsted Power (Gunfleet Sands) Ltd
- Orsted Power (UK) Limited
- Orsted Power Sales (UK) Limited
- Orsted Race Bank (Holding) Limited
- Orsted Sales (UK) Limited
- Orsted Walney Extension Holdings Limited
- Orsted West of Duddon Sands (UK) Limited
- Orsted Westermost Rough Limited
- Race Bank Wind Farm Limited
- Walney (UK) Offshore Windfarms Limited
- Walney Extension Limited
- Westermost Rough Limited
- Ørsted Bioenergy & Thermal Power A/S
- Ørsted Salg & Service A/S
- Ørsted Wind Power A/S