**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 2023 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 2023.**

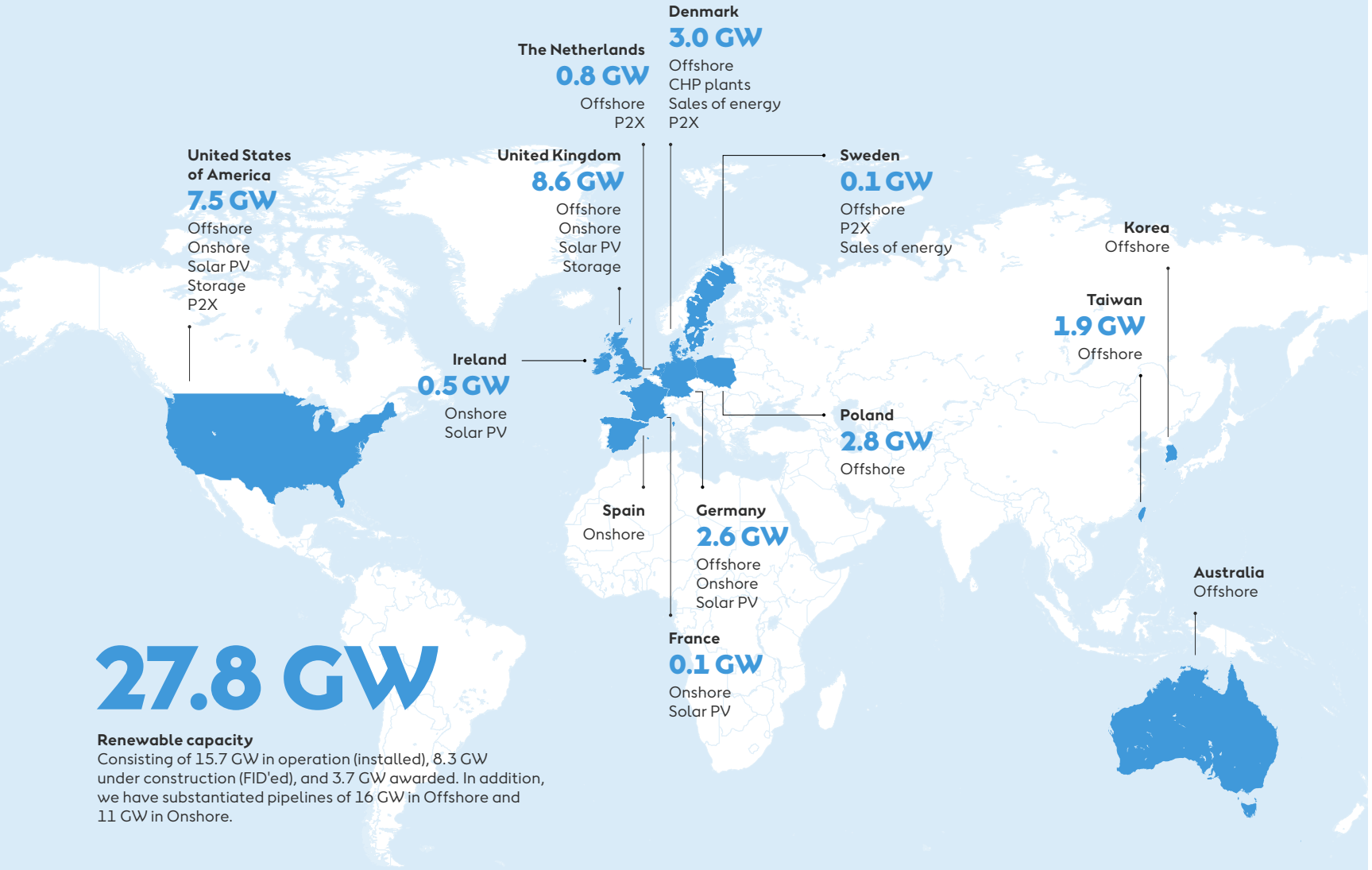
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# Modern slavery act statement 2023



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.

## Our footprint




# 27.8 GW

**Renewable capacity**
Consisting of 15.7 GW in operation (installed), 8.3 GW under construction (FID'ed), and 3.7 GW awarded. In addition, we have substantiated pipelines of 16 GW in Offshore and 11 GW in Onshore.

**Capacity**
GW

**United States of America**

| | |
|---|---|
| Offshore | 1.8 |
| Onshore | 3.2 |
| Solar PV | 2.1 |
| Storage | 0.3 |

**United Kingdom and Ireland**

| | |
|---|---|
| Offshore | 8.5 |
| Onshore | 0.5 |
| Solar PV | 0.1 |

**Continental Europe**

| | |
|---|---|
| Offshore | 7.0 |
| Onshore | 0.2 |
| CHP, power | 2.8 |
| CHP, heat | 3.4 |
| P2X | 0.1 |

**APAC**

| | |
|---|---|
| Offshore | 1.9 |

**Capacity**
- In operation
- Under construction
- Awarded

## Our business and supply chain

Ørsted was founded in 2006 and became a publicly traded company in 2016. Ørsted had an annual revenue of DKK 79.3bn (GBP 9.1 bn) in 2023. Ørsted has its head office in Denmark and operations in various parts of the world, with its biggest renewable energy capacity generated from the United Kingdom.

Ørsted operates with a joint venture set-up in many markets including the United Kingdom. This entails the partnerships to be jointly responsible for development, construction, and operations of those assets and includes ensuring compliance with applicable rules and regulations. At the end of 2023, Ørsted had 8905 employees and operations across Europe, the United Kingdom, Americas, and Asia Pacific. Ørsted aims at achieving 35-38 GW of installed capacity by 2030.

Ørsted has over 9000 suppliers spanning all major geographies. In 2023, 80% of our spend was on products procured for our construction of wind farms and solar farms. 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.

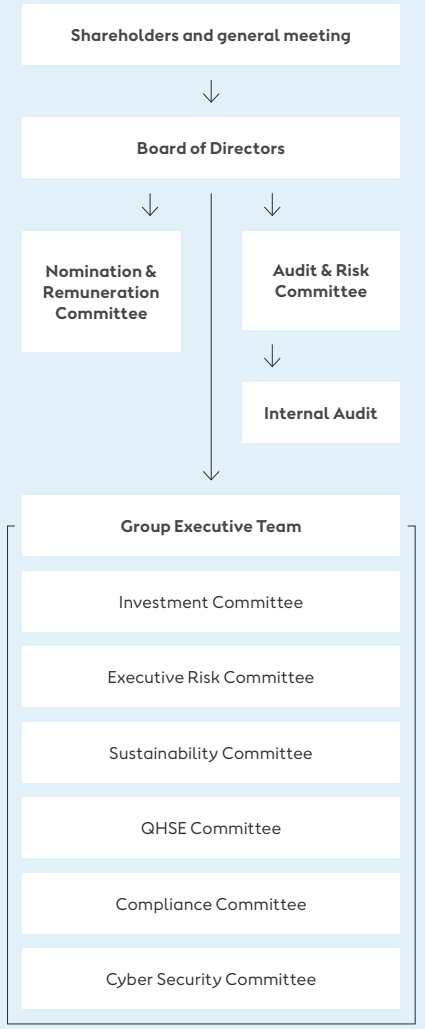
## Governance and policy commitment

The overall and strategic management of the company is anchored in a board of non-executive directors.

**The Board of the Directors** is, together with the executive directors, responsible for the management of the company. They lay down the company's strategy and makes decisions concerning major investments and divestments, the capital base, key policies, control and audit matters, risk management, and significant operational issues. The Board of Directors has established two committees, consisting of members appointed by and among the members of the Board of Directors: The Audit & Risk Committee and the Nomination & Remuneration Committee.

The Board of Directors appoints the Executive Board, consisting of the Group President and CEO, the CFO, and the Chief HR Officer (CHRO), who undertake the day-to-day management of Ørsted through the Group Executive Team. **The Group Executive Team** is supported by specialist committees. One of the committees appointed by the **Group Executive team**, the Sustainability Committee oversees that we live up to our sustainability commitment. It provides recommendations, and monitors performance of our work with sustainability priorities, including progress on targets.

**Our governance model**





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: Ørsted is committed to conducting business in a sustainable way. Ørsted's guiding principles reflect our vision to transform the way the world is powered by developing green, independent, and economically viable energy systems. Ørsted's sustainability commitment is our commitment to adhere to the UN Global Compact which addresses the topics of environment, labour and human rights, anti-corruption, and sustainable economic development.

The 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 and Global diversity & inclusion 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 our value chain to anonymously report any suspected breach of our policies and commitments .

## Evaluating risks and actions

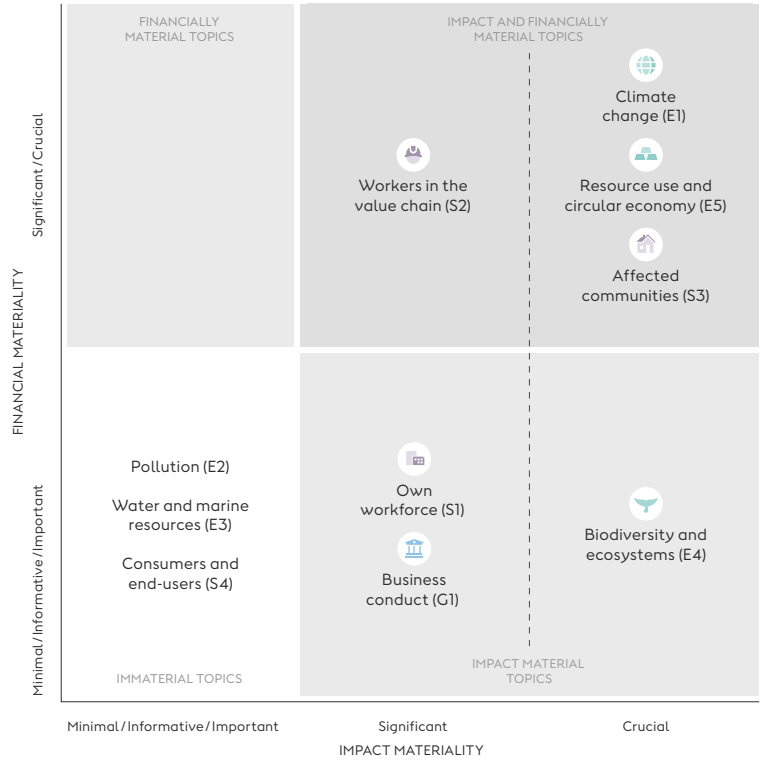
Sustainability is integral to how Ørsted operates our business. We have conducted a double materiality assessment in 2023 by assessing our impact on the environment and society, as well as a financial assessment of the sustainability related risks we are exposed to as a business. The assessments target all material risks, including the risk of modern slavery, human trafficking, and other risks that impact people in our operations and value chain.

The material sustainability risks outcome shows that E1 (climate change), E5 (resource use and circular economy), S3 (affected communities) and S2 (workers in the value chain) are the most significant (refer picture to the right). The environmental impacts and risks within E1 and E5 are closely linked to our strategic efforts to deliver a fast build-out of renewable energy. The buildout also affects people and societies, which is reflected in the impacts and risks within S2 and S3.

In the annual report for 2023, we have highlighted the potential positive and negative impact of each of these risks and the actions we have taken to address them. The various sections from the annual report that address the overall approach to assess, manage, and remediate social risks at Ørsted are referenced further on.

We understand that modern slavery, human trafficking, and other human rights risks can occur in our operations, supply chain as well as the communities surrounding our asset projects, however, the impacts are very low to medium, depending on the geographies and nature of operations of our business.

| **References from the annual report 2023** | Pages |
|---|---|
| Overview of material risks | 73-76 |
| Addressing risks in own workforce | 112-115 |
| Addressing risks in value chain | 120-122 |
| Addressing risks in affected communities | 123-125 |
| Addressing ethical risks, supplier due diligence and management of raising concerns | 127-130 |



## Due diligence priority areas

In our previous MSA statement, we identified four key topics to mitigate human rights risks including modern slavery and human trafficking. These topics are still relevant for our business and we have highlighted additional steps undertaken to tackle these risks in 2023:

- **Sourcing of solar panels and batteries:**
  We have continued working with our suppliers and Engineering, Procurement and Construction contractors to embed traceability clauses in our contracts. We are actively engaged in Solar Power Europe's various workstreams on responsible supply chains including the Supply Chain Sustainability workstream as well as the Solar Stewardship Initiative (SSI). One goal of the SSI is to strengthen traceability in solar panel supply chains.

- **Responsible sourcing of metals and minerals:**
  We have participated in the Buyers Group of Initiative for Responsible Mining Assurance (IRMA) alongside leaders in the automotive, electronics, and gemstone industries to promote responsible supply chains of minerals and metals and ethical mining practices. We began a pilot project using blockchain technology to enhance the transparency of copper usage in a UK wind farm.

- **Harassment and discrimination on board vessels:**
  We launched a Respectful Working Environment Campaign with the aim to focus on bullying, discrimination, and harassment in the maritime industry. The campaign included sending industry best practices to our vessel suppliers, and further engagement and collaboration with selected suppliers including assessment and training.

- **Engagement with sanctioned suppliers:**
  We have continued focus on international sanctions and take into consideration human rights conflicts in areas which have an impact on Ørsted's supply chain. Focussed assessments have also been conducted on export controls compliance to determine areas of exposure for Ørsted.

In 2022, a corporate level human rights impact assessment was conducted and six salient human rights risks were identified. Our corporate webpage provides details on the activities we are undertaking to address each of our salient human rights areas. In addition to this, we initiated a project with an external expert consultancy to develop a roadmap for further integration of human rights due diligence in Ørsted. This three-year roadmap will prioritise our activities aimed at strengthening our human rights management system.



## Awareness building and collaboration

Through close collaboration between governments, industry associations, trade unions, non-governmental organisations and cross- sector working groups, Ørsted aims to meet upcoming legislative requirements, address geographical or systemic human rights risks and to foster a relationship that will help address key challenges both from a company perspective and for the renewable industry. We maintain all the collaborations as mentioned in the MSA statement 2022 and new engagements have been included in our annual report 2023.



## Reporting initiatives

Ørsted's annual report 2023 combines sustainability statements with the ESG performance report to prepare for the Corporate Sustainability Reporting Directive which is a new EU Directive. The report details our performance and, targets and is forward- looking with projections for 2024.

## Looking ahead

Ørsted releases the modern slavery act statement on an annual basis. We continuously work on specific initiatives to identify, address, and mitigate modern slavery and human trafficking and other human rights risks in our value chain.

We piloted a due diligence process based on category and country risk to enable early risk identification and mitigation in supplier engagement. Based on the results of the pilot, the new process will be extended to other high-risk categories during 2024. Ørsted has also developed a reporting mechanism for reported grievances that will be piloted during 2024 to ensure fulfilment of the effectiveness criteria of the UN Guiding Principles on Business and Human Rights for feedback and grievance handling. We also conduct targeted sustainability training for specific suppliers across topics related to human rights (including risks of modern slavery, human trafficking, etc). alongside other environmental topics such as circularity, decarbonisation etc.

**Strengthening our human rights management system**

In 2024, we will focus our efforts on strengthening our human rights management system through the following actions:

1 **Develop a three-year human rights road map:** The plan will include prioritised actions to strengthen Ørsted's adherence to existing and upcoming human rights legislation and stakeholder expectations.

2 **Develop human human rights due diligence tools at an asset level:** We will perform social and human rights impact assessment by creating a standardised approach to conducting assessments before the construction of every new project.

3 **Develop a new procedure for Power- to-X:** The procedure to screen P2X suppliers will be developed and implemented, taking new risks associated with these suppliers as well as Ørsted's manufacturing process into consideration.

4 **Review the governance and operating model for our operational Code of Conduct due diligence:** Update our screening and assessment procedures and strengthen the monitoring of suppliers' Code of Conduct performance during contract execution.

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**This statement relates to the financial year ending 31 December 2023.**

The organisations covered by this statement are the following:

- Barrow Offshore Wind Limited
- Breesea Limited
- Burbo Extension Ltd
- Gunfleet Sands Limited
- Hornsea 1 Limited
- Lincs Wind Farm Limited
- Orsted Burbo (UK) Limited
- Orsted Burbo Extension Holding Ltd
- Orsted Hornsea 1 Holdings Limited
- Orsted Hornsea Two Holdings Ltd
- Orsted Lincs (UK) Ltd.
- Orsted Power (Gunfleet Sands) Ltd
- Orsted Power (UK) Limited
- Orsted Race Bank (Holding) Ltd.
- Orsted Walney Extension Holdings Limited
- Orsted West of Duddon Sands (UK) Limited
- Orsted Westermost Rough Limited
- Race Bank Wind Farm Limited
- Sonningmay Wind Limited
- Soundmark Wind Limited
- Walney (UK) Offshore Windfarms Limited
- Walney Extension Limited
- Westermost Rough Limited
- Ørsted Salg & Service A/S
- Ørsted Wind Power A/S

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

Signed on behalf of the Boards.

**Duncan Clark**
Head of Region UK

26 June 2024