

Modern slavery and human trafficking policy (UK)

Table of contents

1	SCOPE	2
1.1	Introduction.....	2
1.2	Who this policy applies to	2
1.3	Definitions	2
1.4	About Fred. Olsen Renewables Limited	2
2	REFERENCES	2
3	RESPONSIBILITIES	3
4	POLICY STATEMENTS	3
4.1	Fred. Olsen Renewables' Code of Conduct Policy.....	3
4.2	UK specific modern slavery and human trafficking policy	3
5	PROCESSES TO OPPOSE TRAFFICKING AND SLAVERY	4
6	TRAINING AND COMMUNICATION	4
7	REPORTING SUSPECTED MISCONDUCT	4
7.1	How to report.....	4
7.2	Protection.....	5
8	BREACH OF THIS POLICY	5
9	BOARD APPROVAL	5
Appendix 1	List of Fred. Olsen Renewables Limited subsidiary companies	6

1 Scope

1.1 Introduction

This document describes the responsibilities, policy statements, processes, training and communications, reporting, breach of the policy, and board approval for modern slavery and trafficking, and complies with UK acts.

1.2 Who this policy applies to

This policy is in effect for Fred. Olsen Renewables Limited (FORL) with its subsidiary companies as listed in Appendix 1.

The policy applies to all persons working for or on behalf of FORL and its subsidiary companies in any capacity, including employees at all levels, directors, seconded workers, volunteers, interns, agents, contractors, subcontractors, external consultants, etc., and third party representatives and business partners.

1.3 Definitions

Modern slavery is the term used within the UK and is defined within the 'Modern Slavery Act 2015'. The term is used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking.

Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited.

1.4 About Fred. Olsen Renewables Limited

Reference is made to [Fred. Olsen Renewables \(fredolsenrenewables.com\)](https://fredolsenrenewables.com) for further description of current development activities and list of renewable energy assets in operations.

2 References

Applicable checklists and forms:

- N/A

Internal reference documents:

- GOV-01 HSEQ Policy
- GOV-02 Code of Conduct
- GOV-24 Whistleblowing Procedure

External reference documents:

- [Modern Slavery Act 2015 \(legislation.gov.uk\)](https://legislation.gov.uk) for England and Wales
- [Human Trafficking and Exploitation \(Scotland\) Act 2015 \(legislation.gov.uk\)](https://legislation.gov.uk) for Scotland
- [Whistleblowing and Public Interest Disclosure Act 1998](https://legislation.gov.uk)

3 Responsibilities

- **FORL Board of Directors** is responsible for ensuring that this policy complies with FORL's legal and ethical obligations, and that all those under its control comply with it
- **FORL Line Managers** have the primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. They are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- **All FORL personnel** are responsible for complying with this policy and report any suspected misconduct related to modern slavery and human trafficking. Duties:
 - You shall ensure that you read, understand, and comply with this policy
 - You are required to avoid any activity that might lead to, or suggest, a breach of this policy
 - You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of FORL's business or supply chains as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions with any of FORL's supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager or HR Manager or a Director
 - You can also contact the government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery
 - The prevention, detection and reporting of modern slavery and human trafficking in any part of FORL or supply chains is the responsibility of all those working for it or under its control

4 Policy statements

4.1 Fred. Olsen Renewables' Code of Conduct Policy

The Fred. Olsen Renewables Code of Conduct Policy is in effect for FORL with its subsidiary companies. Reference is made to [Sustainability \(fredolsenrenewables.com\)](https://www.fredolsenrenewables.com) for signed copy of the Code of Conduct Policy.

4.2 UK specific modern slavery and human trafficking policy

In compliance with the 'Modern Slavery Act (2015)' and 'Human Trafficking and Exploitation (Scotland) Act 2015', the following UK specific additions to the 'Code of Conduct' apply:

- FORL is committed to combatting slavery and human trafficking in all its forms in its own business and supply chains
- FORL adopts a zero-tolerance approach to any criminal offence
- FORL publishes a modern slavery statement every year in accordance with section 54 (6) of the Modern Slavery Act 2015
- This policy does not form part of any employee's contract of employment and may be amended at any time
- This policy sets out the responsibilities of FORL, and the responsibilities of those working for and on its behalf, in observing and upholding our position on modern slavery and human trafficking and to provide information to those working for and on behalf of FORL on how to identify and report suspected misconduct