

Modern slavery and human trafficking policy (UK)

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1 Scope

1.1 Introduction

This document addresses topics concerning responsibilities, policy statements, processes, training and communications, reporting, any nonconformities, and board support for countering modern slavery and trafficking, under reference to UK acts.

1.2 Who this policy applies to

This policy is designed for Fred. Olsen Renewables Limited (FORL) and will equally apply to FORL's subsidiaries as listed in Appendix 1.

It is expected that all persons working for or on behalf of FORL and/or its subsidiaries 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 conform to this policy.

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-03 Code of Conduct Policy
- GOV-22 Transparency Act – Due diligence
- 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 Governance

- **FORL's Board of Directors** is focusing on the proper organisation of the business of FORL and hereunder on an appropriate policy countering modern slavery and human trafficking duly aligned with FORL's governing ethical guidelines.
- **FORL's Line Managers** are correspondingly focusing on implementing such policy, monitoring its use and effectiveness, dealing with queries about it, and auditing internal control systems and procedures with a view to ensure they are effective in countering modern slavery. Emphasis is placed on ensuring that those reporting to them understand and are committed to relate to this policy and receive adequate and regular training on it and protections against potential modern slavery in supply chains.
- **All FORL personnel** are expected to comply with this policy and to report any duly suspected misconduct related to modern slavery and human trafficking.
Expectations from such individuals:
 - 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 due suspicion of modern slavery within any part of FORL's business or supply chains as soon as practically 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, you can 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 within any part of FORL or supply chains, is related to as a task for all those working for such 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 together with its subsidiaries. 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 as statutorily required:

- Emphasis on combatting slavery and human trafficking in all its forms within its own business and supply chains.
- A zero-tolerance approach to any such criminal offence.
- Publishing of a modern slavery statement every year in accordance with section 54 (6) of the Modern Slavery Act 2015.

- FORL's policy on this does not form a direct part of any employee's contract of employment and it may thus be amended at any time as considered appropriate.
- This policy sets out the awareness of FORL, and FORL's expectations from those working for and on its behalf, in observing and adhering to FORL's policy on modern slavery and human trafficking and provision of information to those working for and on behalf of FORL on how to identify and report suspected misconduct in this regard.

5 Processes to oppose trafficking and slavery

FORL's staff will have salaries, which at least meet the National Living Wage and benefit from statutory leave entitlements.

Furthermore, emphasis is placed on that all staff provide their National Insurance Number, or Working Visa if they are not British nationals, prior to their employment and submit to and undertake necessary checks to determine their eligibility to work in the UK. By checking the employees' National Insurance Numbers or Working Visas, FORAS can consider whether they are legally eligible to work in the UK, and that their salary can be monitored as required by His Majesty's Revenue & Customs (HMRC).

FORL's supply chain is predominantly UK and EU based and it is therefore expected that these suppliers have applicable anti-slavery and human trafficking policies and procedures.

FORL will refuse commercial relationships with businesses known to be involved in slavery or human trafficking.

6 Training and communication

As part of FORL's policy, all staff members will undertake training on combating modern slavery and human trafficking via an eLearning platform. All new staff members are required to complete this module as part of the induction process.

FORL's zero-tolerance approach to modern slavery in its business and supply chains will be communicated as appropriate to suppliers, contractors, and business partners at the outset of its business relationship with them and equally reiterated as considered appropriate.

7 Reporting suspected misconduct

7.1 What to report

A report on suspected misconduct must provide a factual, objective, and specific description of the suspected unacceptable condition. The following information should be included:

- What happened? (e.g., legal or ethical breaches)
- Where did it happen?
- When did it happen?
- What is the extent of the issue?
- Are there witnesses or documentation to support the report?

When using the whistleblowing channel, whistleblowers receive a username and password after submitting their report. If anonymity is chosen, it is crucial to keep the receipt with the username and password. If these are lost, access to the case will no longer be possible.

Whistleblowers can log into the portal to communicate with the case handler, update information, or follow up on the report.

7.2 How to report

Suspected misconduct should be reported through the [Whistleblowing channel](#) available on Fred. Olsen Renewables' website.

Through the digital portal, whistleblowers can choose between:

- **Identified reporting:** Submit a report through the channel with your name, phone number, and email address visible to the case handlers.
- **Anonymous reporting:** Submit a report anonymously through the channel, ensuring confidential and secure processing.
- **Written reporting:** Alternatively, reports can be addressed to the relevant FORL group of company, c/o Fred. Olsen & Co. AS (FOCO), HR and Personnel Department, or the safety representative of the relevant company.

Verbal reporting is also facilitated through the channel both with a name and anonymously.

FOCO's Sustainability and Compliance Manager is the primary recipient of all whistleblowing reports. He/she will keep record of all whistleblowing cases and subject to due procedures process the report as appropriate through the CEO of the involved FORL group of company.

The written reports that may be submitted to the relevant CEO, line manager, or other representatives of the company in question, i.e., safety representative, union representative, or company lawyer will be reported to FOCO's Sustainability and Compliance Manager as digital reports.

The whistleblowing channel is available for both internal and external personnel to report duly suspected misconduct.

7.3 Protection

FORL will place emphasis on ensuring that no whistleblower suffers detrimental treatment or victimisation because of duly and in good faith reporting suspicion that modern slavery is or may be taking place in any part of its business or within any supply chains of FORL. Detrimental treatment includes dismissal, disciplinary action, threats, or similar unfavourable treatment connected with raising a concern.

8 Nonconformities

Any FORL employee placed in breach of this Modern slavery and human trafficking policy may face disciplinary action.

FORL may terminate its commercial relationship with suppliers, contractors, and other business partners if they are found to have been involved in modern slavery.

9 Board support

This policy is approved by the FORL Board of Directors, who will review it annually.

Oslo, June 2026

Sofie Olsen Jebsen
Chair of the Board
Fred. Olsen Renewables Limited

Version history:

- | | |
|------------|---|
| 26.05.2026 | <ul style="list-style-type: none">• Updated with reference to 'GOV-22 Transparency Act – Due diligence'• Paragraph 7 updated with link to whistleblowing channel |
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| 25.10.2023 | <ul style="list-style-type: none">• First release |

Appendix 1 List of Fred. Olsen Renewables Limited subsidiary companies

- Fred. Olsen Renewables Licences Limited
- Fred. Olsen CB Limited
- Fred. Olsen CBH Limited
- Fred. Olsen CBX Limited
- Fred. Olsen Wind 2 Limited
- Fred. Olsen Wind Holdings Limited
- Fred. Olsen Wind Limited
- Bennan Limited
- Brockloch Rig 1 Limited
- Brockloch Rig Windfarm Ltd
- Crystal Rig Windfarm Limited
- Crystal Rig II Limited
- Crystal Rig III Limited
- Crystal Rig IV Limited
- Elchies Wind Limited
- Fetteresso Wind Limited
- Mid Hill Wind Limited
- Paul's Hill II Limited
- Paul's Hill Wind Limited
- Rothes Wind Limited
- Rothes II Limited
- Rothes III Limited
- Windy Standard Limited
- Windy Standard III Limited
- Windy Standard I Repower Limited
- Fred. Olsen Renewables Holdco Limited
- Hvitsten II JV limited