

# Modern slavery and human trafficking policy (UK)

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# 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

## 5 Processes to oppose trafficking and slavery

FORL is committed to providing applicable staff with a salary, which at least meets the National Living Wage and offering the required statutory leave entitlement.

Furthermore, we ensure all our staff have provided their National Insurance Number, or Working Visa if they are not British nationals, prior to their employment and perform the necessary checks to determine their eligibility to work in the UK. By checking our employees' National Insurance Numbers or Working Visas, we know they are legally eligible to work in the UK, and that their salary will be monitored by His Majesty's Revenue & Customs (HMRC).

FORL's supply chain is predominantly UK and EU based therefore we expect these entities to have applicable anti-slavery and human trafficking policies and procedures.

FORL will not forge commercial relationships with any business knowingly involved with slavery or human trafficking.

## 6 Training and communication

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

Our zero-tolerance approach to modern slavery in our business and supply chains shall be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis.

## 7 Reporting suspected misconduct

### 7.1 How to report

FORL aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

A report of a suspected misconduct should cover the following:

- WHO: If relevant, name of persons or organisation that is involved in the case
- WHAT: Description of the suspected misconduct, as detailed as possible, and preferably with reference to which law, regulation, rule, or ethical standard that is considered breached
- WHERE: Location of the suspected misconduct
- WHEN: Date or time period of the suspected misconduct

**FORL personnel** should report suspected misconduct by following the steps in GOV-24 Whistleblowing procedure, paragraph 4.4.1

**External personnel** may report suspected misconduct using these alternatives:

1. Orally in electronic form or in physical meeting with company representative
2. Email to [whistleblower@fredolsen.com](mailto:whistleblower@fredolsen.com)
3. Deliver or send letter to the following postal address:  
Fred. Olsen & Co  
Att: Sustainability and Compliance Manager  
P.O. Box 1159 Sentrum  
0107 Oslo  
Norway
4. Via lawyer

## 7.2 Protection

FORL is committed to ensuring no one suffers any detrimental treatment or victimisation because of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern.

## 8 Breach of this policy

Any FORL employee who breaches 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 approval

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

Oslo, 25.10.2023



Ivar Brandvold  
Chairman of the Board  
Fred. Olsen Renewables Limited

### Version history:

25.10.2023 • 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 Storage 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