

Human Rights Policy

December 2018

**“Respect for human rights is key to
operate our business sustainably.”**

Magnus Hall, CEO Vattenfall



VATTENFALL

Our Human Rights Policy

December 2018

Our commitment

We commit to respect human rights in our supply chain, operations, and in the communities in which we operate.

In practice, we strive to:

- Adhere to the UN Guiding Principles for Business and Human Rights (UNGP) and OECD guidelines for Multinational Enterprises, and apply the principles of UN Global Compact as a signatory¹
- Prohibit discrimination, child labour, forced labour and trafficked labour.
- Provide safe and healthy working conditions, fair working hours, fair wages and benefits.
- Support community engagement and respect indigenous peoples' rights.
- Extend our sphere of influence and use our leverage directly and with partners to contribute to positive human rights impacts.

Identifying our human rights risk and impacts

We systematically identify, assess and manage human rights risks and impacts through due diligence processes which cover our own operations as well as sourcing and purchasing.

Our salient risks are:

- Related to our supply chain in the areas of suppliers' working conditions and impacts on local communities and environment, in particular in high risk countries.
- Connected to our own operations in the areas of working conditions for subcontractors, impacts on local communities or indigenous peoples, and privacy (personal data and information).

Managing our human rights risk and impacts

Our aim is to continuously improve our ability to identify, assess and manage human rights risks. This is an ongoing journey and will be driven not least by raising the awareness of human rights related issues among our employees and other stakeholders.

In practice, we:

- Perform trainings to raise awareness of human rights issues, including those that impact Vattenfall internally in the broader aspect of diversity.
- Require suppliers and sub-suppliers to comply with an ethical clause like our Code of Conduct for Suppliers, which states suppliers should take measures to avoid infringing human rights.
- Engage with suppliers through dialogues, audits, assessments and corrective action plans to minimize adverse human rights impacts.
- Work for the right to freedom of association and collective bargaining in our supply chain.
- Encourage open stakeholder feedback through interviews, surveys, questionnaires, focus group discussions, and regular materiality analyses.
- Consult with stakeholders who may be affected by our operations, such as indigenous peoples.
- Have a whistle blowing system available to employees, consultants, contractors and suppliers, to report serious irregularities concerning Vattenfall.
- Work to remedy adverse human rights impacts caused or contributed to by Vattenfall's operations.
- Track and assess our actions and report regularly and transparently on our human rights work.

The Human Rights policy is decided by the Board of Directors.

It is supported by the Sustainability Policy, Code of Conduct and Integrity, Code of Conduct for Suppliers, and our statement on slavery and human rights (in accordance with the UK Modern Slavery Act). Vattenfall's Human Rights policy should be read together with Vattenfall's other policies. All Vattenfall Policies are valid throughout the entire Group and the responsibility for implementation lies with the head of Business Areas and Staff Functions.

¹Vattenfall also adheres to the International Bill of Human Rights and ILO Declaration on Fundamental Principles and Rights at Work.