Vattenfall's statement on slavery and trafficking

2025

Introduction from Anna Borg, CEO and President of Vattenfall AB

This is Vattenfall's ninth update of the statement on slavery and human trafficking following the introduction of the Modern Slavery Act in 2015. We're proud of the progress we have made and we are committed to continuously improve our approach towards identifying and combating any form of modern slavery and human trafficking throughout our value chain.

About Vattenfall

Vattenfall AB is the parent company of the Vattenfall Group (the "Group") and is 100% owned by the Swedish State. The Group owns and operates a diverse range of energy businesses and is involved in the generation, distribution and sales of electricity and heat. Vattenfall's core countries of operation are Sweden, Germany, the Netherlands, Denmark and the UK. In 2025, Vattenfall reported a turnover of SEK 234,915 million, Vattenfall has a total of 21,301 employees, out of which 766 are temporary. Further details can be found at **www.vattenfall.com.**

1. Organisation structure and supply chains

The Group's activities are divided into five different business areas: Generation, Wind, Markets, Distribution, and Customers & Solutions. Responsibility for modern slavery and respecting human rights lies with the heads of the business areas and staff functions.

Supply chains for the five business areas can be roughly consolidated into the following sourcing streams:

	Number of suppliers	Primary products	Primary countries	Number of supplier screenings conducted	Number of site audits conducted
Goods & services	22,882	Diverse	Sweden, Germany, The Netherlands & other European and Asian countries	8,864	36
Waste & biomass	210	Woody biomass, waste, bio-oils	Sweden, Netherlands, Germany, France, Poland, Belgium, Finland, Iceland, Norway, UK, Latvia, Canada, USA.	199	38
Natural gas	N/A	Natural gas	European gas hubs	N/A	N/A
Nuclear fuels	13	Uranium	Canada, Australia, USA, Great Britain, Germany, Netherlands and Sweden.	20	5

Vattenfall also hires contractors to carry out various activities including installations, logistics and construction. As Vattenfall operates in locations with established human rights legislation, the risk of modern slavery for contractors operating on our sites is low. Nonetheless, several measures are being implemented, including a pilot project on worker welfare to further monitor their working conditions. See section 5. Progress and Effectiveness for details.

[1] Vattenfall does not hold any direct contract with gas producers as the gas is sourced through European gas hubs. More information can be found in Section 4: Due Diligence Procedures

2. Our Policies

Vattenfall is a signatory of the UN Global Compact and acknowledges that our business has a duty to respect all internationally recognised human rights based on the International Bill of Human Rights. Our Human Rights Policy forms the foundation of our work and is based on The Universal Declaration of Human Rights, The International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work, The OECD Guidelines for Multinational Enterprises, United Nations Global Compact and UN Guiding Principles for Business and Human Rights.

In respect to modern slavery, the Human Rights Policy states our aim to:

> Commit to provide decent working conditions and treat everyone with equity, dignity and respect, we promote equity, diversity and inclusion and work against all forms of child labour, modern slavery, harassment, and discrimination in our own operations, our supply chains and with partners.

Furthermore, Vattenfall has a number of policies governing its operations and its suppliers' and partners' behaviour. Internally, the Code of Conduct and Integrity defines policies for conducting business with integrity in the context of Vattenfall's four principles: Open, Positive, Active, and Safety.

With regards to our "Positive" principle, the Code of Conduct and Integrity states:

> Our procurement processes are fair, transparent and responsible, and we only work with those who share our commitment to doing business in an appropriate and ethical manner.

And linked to our "Active" principle, it specifies:

> It is every employee's responsibility to report anything that does not seem appropriate or safe. Examples include: ...the possible infringing of a person's human rights...

The Code of Conduct and Integrity also establishes a whistleblowing system available to any stakeholder to report serious irregularities concerning Vattenfall, including human rights violations. In 2025, no cases of modern slavery were reported through the system. In cases where Vattenfall has directly caused or contributed to negative human rights impacts, we commit to provide appropriate forms of remediation. Vattenfall's whistleblowing channel can be accessed in a variety of languages and is available 24/7 at: https://report.whistleb.com/en/vattenfall

The Group's Code of Conduct for Suppliers and Partners[2] defines our expectations on our counterparties in the area of human rights and working conditions, the environment and business integrity. It explicitly addresses modern slavery, and states that all forms of modern slavery are unacceptable to Vattenfall. More information about our approach to supply chain responsibility is available at: https://group.vattenfall.com/who-we-are/sustainability/social-responsibility/supply-chain-responsibility

The Code of Conduct for Suppliers and Partners includes specific provisions on entering employment freely and freedom of movement and association of employees, linked to the International Labour Organisation's 11 indicators of forced labour. Additionally, it also prohibits other human rights violations that are linked to

[2] The Code of Conduct for Suppliers and Partners is translated into several languages. English, Swedish, Dutch and German translations can be found in the local version of our Group websites: group.vattenfall.com. Other language translations including Danish, Finnish, French, Polish and Chinese are shared with suppliers upon request. Vattenfall requires suppliers to communicate this policy to their workers.

modern slavery such as excessive overtime, child labour, discrimination, the confiscation of worker's identity documents and any threat of violence, harassment and intimidation towards employees.

This policy is enforced through various mechanisms, including the Ethical Clause. The Ethical Clause is a contractual provision that requires suppliers to adhere to the Code of Conduct for Suppliers and Partners (or an agreed upon equivalent), enables on-site audits by Vattenfall, and allows for contract termination in case of severe violations or if the supplier refuses to rectify and remediate impacts. See section 4. Due Diligence procedures for more information on the enforcement mechanisms.

Lastly, the Guide to the Vattenfall Code of Conduct for Suppliers and Partners has been developed as an accompanying document to the Code. The aim is to ensure that our suppliers and partners have access to a range of different examples on how to fulfil the expectations outlined in the Code. This Guide incorporates elements related to modern slavery, including guidelines and best practices that suppliers can implement to ensure their compliance with our Code of Conduct and international standards.

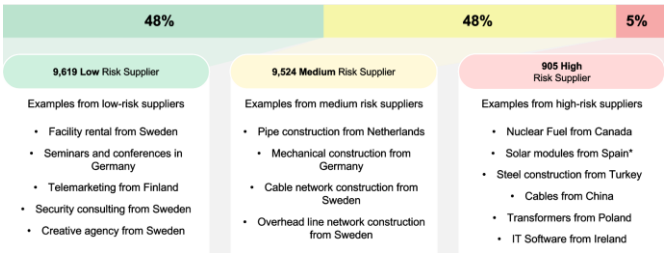
The above policies were developed following multiple rounds of internal and external stakeholder feedback and are available at https://group.vattenfall.com/who-we-are/sustainability/policies-and-management.

3. Risks and risk assessment

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. In addition to our due diligence procedures for our supply chain (see section 4. Due diligence procedures) we engage third party experts every three to five years to conduct human rights risk assessments of our full value chain. In 2025, we continued to work on the results of our latest Human Rights assessment (from 2021), addressing our most salient risks, which include community engagement, livelihoods, and cultural heritage; grievance mechanisms and access to remedy; Indigenous Peoples; occupational health, safety and security; just transition and responsible decommissioning; environmental impacts; sourcing from conflict-afflicted or high-risk areas; and supplier and contractor labour conditions. We also do internal risk assessments on an annual basis where we identify and assess risks arising from any significant changes in e.g. our product & service portfolio, geographies and supply chain.

We are aware of the risk of modern slavery in certain product categories and geographies, and work diligently to prevent instances of modern slavery. No cases of modern slavery have been found in our Tier 1 suppliers in 2025.

On an annual basis, we identify high-risk suppliers among our active supplier base, covering Goods & Services, Waste and Biomass, and Nuclear fuels[3], based on product and service category, manufacturing country risk, and spend. This control helps us to validate whether appropriate risk mitigation on existing high-risk suppliers took place. In 2025, the assessment revealed 905 high-risk suppliers, which represents around 5% of our total supplier base. Currently we have approximately 88% of our supplier base covered by our annual risk assessment and our aim is to increase this coverage. For the 26 newly detected high-risk suppliers, we initiated dialogues on key risk elements, including modern slavery if relevant. Depending on the risk picture, follow-up measures might include desktop follow



[3] This annual review does not cover commodity fuels and ancillary products and services. Risk assessments on these categories are carried out separately and cover 100% of our counterparties.

up, supplier dialogues, supplier trainings or on-site sustainability audits. For the recurring high-risk suppliers, we review the effectiveness of the previous measures and follow up where necessary.

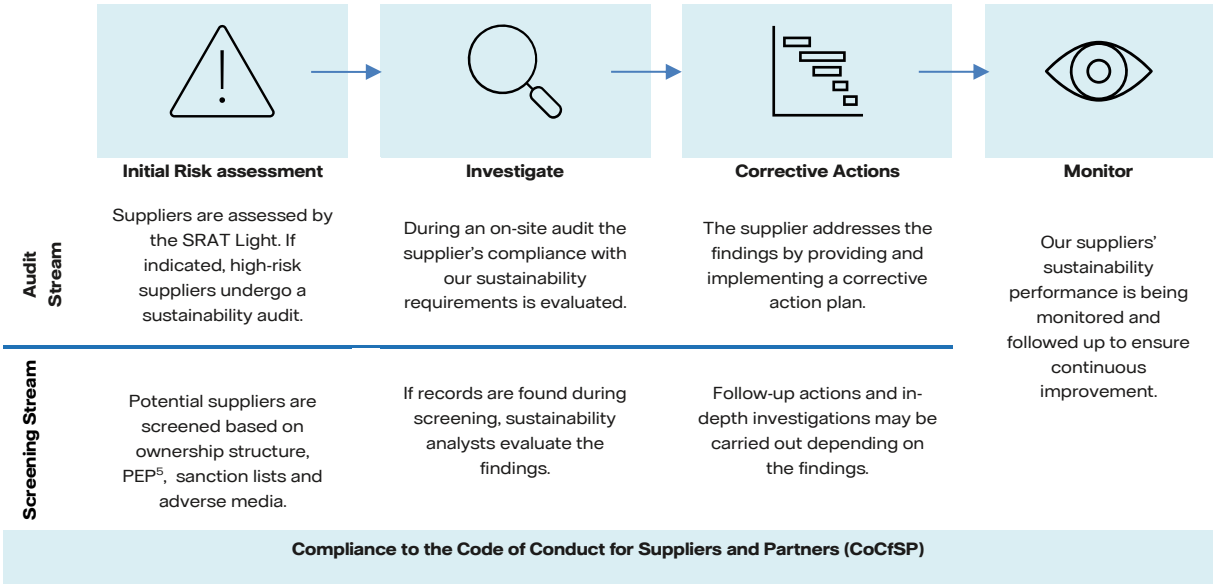
The situation of the Uyghurs and the strong indications of potential links to forced labour in the Xinjiang region continue to be of major concerns to Vattenfall. This is particularly significant as it can affect our solar, batteries and vehicle fleet[4] supply chains, and can be present in raw material extraction and processing done in the region, potentially ending up in products relevant to Vattenfall. We continue to monitor the situation, engage in capacity building, hold internal and external dialogues, and collaborate through industry initiatives.

In 2025, the risk of forced and child labour in the supply chain was determined as a material topic by our yearly Double Materiality Assessment (DMA). This prioritization led us to implement enhanced due diligence practices to prevent and mitigate this impact. See section 4. Due diligence procedures for more information.

4. Due diligence procedures

The Group purchases a wide range of goods, services, and fuels, with varying risk profiles and varying legal and sustainability requirements. The composition and complexity of the Group's supplier base varies depending on what is being purchased or sourced. Therefore, the evaluation of our suppliers' implementation of the Group's Code of Conduct for Suppliers and Partners varies. Nevertheless, modern slavery is always considered when evaluating all suppliers.

Our general approach to due diligence in the supply chain is described in the following graphic, with slight nuances in the different sourcing streams based on risks, regulations, and market conditions for those streams:



The Supplier Risk Assessment Tool, hereafter SRAT Light[6], identifies and assesses ESG risks, including labour conditions and modern slavery, in connection to suppliers and contractors and provides a risk response (e.g., full or tailored scope sustainability audits, self-assessment questionnaires or other

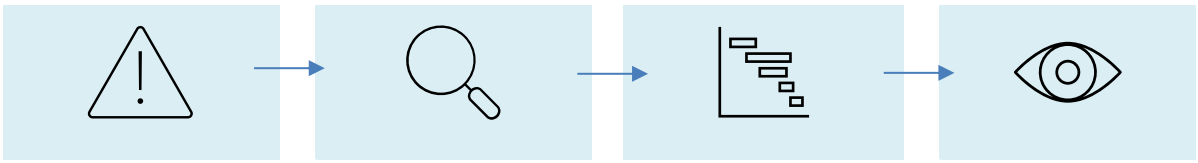
[4] Mainly work vehicles used for sales and maintenance.
[5] PEP: Politically Exposed Person
[6] This is a tool used by the procurement organisation to assess individual suppliers' sustainability risks. A supplier's sustainability risks are based on manufacturing country, product or service provisioning category, and contracted spend.

engagement activities). The tool is applied individually on suppliers with a contracted volume above €100,000 prior to contracting to assess suppliers' risks and identify appropriate risk mitigation based on product or service category, manufacturing country and spend risk. When recommended by the SRAT Light, a full or tailored-scope on-site audit focusing on all or either environmental, social or governance dimensions is conducted by a third party on high-risk suppliers. If the supplier is contracted, all non-conformances that are identified during the audit are followed up in a corrective action plan.

The checklist for our on-site sustainability audit covers potential modern slavery risks at suppliers by specifying items to observe, such as the presence of recruitment fees or deposits, withholding of identity documents, substantial differences on the conditions promised to (migrant) workers versus current working conditions, and the ability of each worker to resign from their job voluntarily and freely. If excessive overtime is detected in an audit, which can be one indicator of modern slavery, we alert the supplier to take immediate actions to reduce the working hours to sustainable levels, conduct a root cause analysis to identify the cause for the overtime and initiate long-term actions.

Additionally, Vattenfall screens and monitors potential and existing counterparties (e.g. suppliers, partners and select B2B customers) for risk factors based on environmental, social and governance criteria to identify potential risks and drive collective improvements. We continuously monitor our counterparties based on their associated risk level as part of our monitoring & re-screening strategy. High risk suppliers are constantly monitored, while medium risk are re-screened every 2 years and low risk every 3 years.

Building on these efforts, recent board-level discussions on forced labour risks in our supply chains led to the implementation of an enhanced due diligence process for sourcing high-risk product categories. This process includes several steps that allow for a more thorough and consistent evaluation of suppliers based on specific risk information connected to each product category. We've applied this approach to solar panels, batteries, company cars, IT equipment, and uranium to gain deeper insight into associated risks, including modern slavery. Our goal is to expand this in-depth assessment to other high-risk categories. While the steps may vary depending on the supplier's context and the most prominent risks in their supply chain, they typically involve the following:



	Initial Risk assessment	Investigate	Corrective Actions	Monitor
Audit Stream	Suppliers are assessed by the SRAT Light. If indicated, high-risk suppliers undergo a sustainability audit.	During an on-site audit the supplier's compliance with our sustainability requirements is evaluated. **Enhanced due diligence step:** When assessing a potential high-risk 1st tier supplier, it undergoes a full scope sustainability audit.	The supplier addresses the findings by providing and implementing a corrective action plan.	Our suppliers' sustainability performance is being monitored and followed up to ensure continuous improvement.
Screening Stream	Potential suppliers are screened based on ownership structure, PEP, sanction lists and adverse media. **Enhanced due diligence step:** External reports on the risks in the supplier's industry (including modern slavery) are reviewed.	If records are found during screening, sustainability analysts evaluate the findings. **Enhanced due diligence step:** We may ask suppliers for traceability records and due diligence measures to understand their sustainability controls and supply chain.	Follow-up actions and in-depth investigations may be carried out depending on the findings.	

Compliance to the Code of Conduct for Suppliers and Partners (CoCfSP)

In parallel, we collaborate with other industry stakeholders through multi-stakeholder initiatives with the aim to jointly assess and mitigate risks in the deeper supply chain. Where appropriate, we incorporate insights gained from these engagements into our decision-making process, looking to ensure a more comprehensive understanding of our suppliers' context.

Standard due diligence practices per supply chain category are summarised as follows:

	Goods and services	Waste and biomass	Natural gas	Nuclear fuels
Threshold for screening	All counterparties with a contract value over €10,000.	Differing thresholds to conduct screenings are applied across the organisation, which are currently being aligned.	All natural gas counterparties.	All nuclear fuels counterparties.
Threshold for sustainability on-site audits	Suppliers from high-risk countries and suppliers of high-risk product or service categories are regularly audited (every 3rd year) if their contracts are over €100,000.	Differing thresholds for sustainability audits are applied across the organisation, which are currently being aligned.	There are no audits conducted on gas suppliers as we use the wholesale market to obtain gas for our own consumption and for our customers.	All nuclear fuel suppliers are regularly audited (every three to six years).
Industry Initiatives	Industry initiatives in Goods and Services are often product or industry dependent which is why Vattenfall participates in several of these, including the Solar Stewardship Initiative, the International Responsible Business Conduct Agreement for the Renewable Energy Sector, and the German Energy Sector Dialogue.	The woody biomass that we purchased from third parties on the international market in 2025 was sourced only from certified suppliers within the EU, Canada and the U.S. The certifications we rely on are: the Sustainable Biomass Program (SBP) and/or the Forest Stewardship Council (FSC).	Vattenfall supported the Gas Taskforce initiated by the Responsible Commodities Sourcing Initiative (RECOSI), which is investigating if the model used to address sustainability risks of coal producers can be adapted for the natural gas supply chain. As part of this, a due diligence framework for natural gas that tackles a range of sustainability risks, including forced labour is being designed.	Vattenfall is an active member of the World Nuclear Association (WNA), participating in the WNA ESG working group.

5. Progress and effectiveness

Since 2023, we have detailed the actions taken in response to key human rights risks in our Human Rights Progress Report, outlining efforts to reduce negative impacts and promote positive outcomes. We also disclose actions towards addressing modern slavery in our Annual and Sustainability Report, where forced and child labour were added as material topics this year. In 2025, as detailed in these reports, we introduced additional measures to strengthen our approach to modern slavery and human rights such as:

- Continuing the development of a category matrix[7] to review human rights and other risks related to the products and services Vattenfall purchases. In 2025 a mapping was conducted to identify the product categories exposed to forced labour, which serves as input to future product category strategies and action plans.

[7] A category matrix is a map of sustainability focus areas against Vattenfall's product categories. This helps identify the sustainability risks associated with each product purchase, allowing for targeted actions to be taken to mitigate those risks.

- Developing a “Worker’s Voice” survey template to be implemented collaboratively with a supplier as part of a pilot.
- Conducting a one-month pilot with a supply chain transparency software provider to help identify risks such as modern slavery and improve visibility beyond Tier 1 in high-risk supply chains.
- Continuing dialogues internally and externally around supplier and contractor labour conditions to increase awareness, share learnings and map risks connected to several human rights topics including modern slavery. Specifically, we conducted biannual supplier meetings with particular emphasis on the solar supply chain with the objective of mitigating the risk of forced labour.
- Requesting component traceability reports from specific suppliers in high-risk product categories to better assess several risks in their value chains, including forced labour.
- Requesting battery suppliers to commit to enhance transparency regarding the origins of their materials, to better assess the risk of child and forced labour associated with raw materials used in these products.
- Implementing a chain of custody certification scheme for bioenergy feed coming from outside the European Union using EU recognized voluntary certification schemes along the whole supply chain, that include child labour as a compliance criterion.
- Participated in two multi-stakeholder initiatives (German Energy Sector Dialogue and International Responsible Business Conduct Agreement for the Renewable Energy Sector) which developed tools to identify and address human rights risks in the construction of renewable energy sites, specifically focusing on vulnerable groups such as migrant workers. In 2025, various tools were tested, with particular interest on trainings for site managers, a template for mapping contractors on site, and tender requirements. We aim to implement selected tools on a broader scale after refining these based on the feedback from the pilot process.
- Engaging with peer-level suppliers in the energy and other sectors affected by the risk of Uyghur forced labour in knowledge sharing sessions around labour conditions in supply chains, seeking to establish a consolidated approach towards this matter.

6. Training and competence building

We aim for 100% of newly hired buyers in Procurement to receive a training which covers compliance and human rights in the supply chain. Additionally, Vattenfall has developed an internal library of sustainability requirements to help integrate human rights and sustainability considerations into tenders. It simplifies risk mitigation by enabling quick matching of product and service categories with their associated sustainability risks and suggested tender requirements to mitigate these. This encourages Procurement professionals to deepen their understanding of sustainability issues attached to certain product categories and apply appropriate requirements early in the tender process.

Furthermore, we conducted workshops focused both on ensuring we execute our existing risk identification and management activities, as well as identifying opportunities to go beyond mandatory requirements to further improve our environmental, social, and governance performance in the supply chain. A general human rights training, including modern slavery, is available to all employees. Our Share and Learn[8] sessions with key suppliers are also part of our capacity building efforts. In 2025 a targeted training addressing risks of forced labour and exploitation on construction sites was delivered to approximately 200 site managers.

Vattenfall also participated in various seminars and workshops performed together with industry initiatives and networks like Solar Power Europe, The Swedish Network for Business and Human Rights, the Nordic IT buyers’ initiatives: ATEA Sustainability Focus and ASF Leadership for Change, Wind Europe, the International RBC Agreement for the Renewable Energy Sector, and the German Energy Industry Dialogue.

[8] A Share and Learn session consist on meeting with suppliers with the objective of sharing practices around a specific relevant topic for both companies.

Accountability

The Group will report regularly and transparently on its approach to addressing modern slavery and human trafficking annually in conjunction with the publication of the annual report and will include information about:

1. The Group and its supply chain
2. Policies relevant to modern slavery
3. Risk assessment procedures and key risks
4. Due diligence processes applied during sourcing and purchasing activities
5. Progress and effectiveness of efforts to combat modern slavery and human trafficking in the value chain
6. Training and competence building

Vattenfall's Board of Directors has a Human Rights update and approval of the Human Rights policy and the Statement on UK Modern Slavery Act on the agenda every year.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year ending 2025-12-31. This statement was approved by the Board of Directors on 04 February 2026 and is valid for the Group and its subsidiaries, including the UK subsidiaries listed in the Annex.

Anna Borg
CEO and President of Vattenfall

Annex - List of UK subsidiaries

Company name	Company number
Vattenfall Wind Power Ltd	06205750
Vattenfall Heat UK Limited	02951085
Clashindarroch Wind Farm Limited	05358030
Kentish Flats Limited	04130301
Vattenfall Scotland Limited	SC380657
Ormonde Energy Limited	04874027
Ourack Wind Farm One Limited	05532689
Ourack Wind Farm Two Limited	05475126
Thanet Offshore Wind Limited	04512200
Nuon UK Limited	03446477
Pen Y Cymoedd Wind Farm Limited	03494498
Swinford Wind Farm Limited	06941519
Llanerfyl Access Road Consortium Limited	06118626
East Anglia Offshore Wind Limited	06990367
Ourack Wind Farm LLP	SO305106
Aberdeen Offshore Wind Farm Limited	SC278869
Vattenfall Brent Cross Limited	12504538
Midlothian Energy Limited	SC678840
Muir Mhor Offshore Wind Farm Limited	SC717262
Clifton Solar Project Limited	13876958
Bristol Heat Networks Limited	11652156
Clashindarroch II Wind Farm Limited	SC825996