

Human Rights Progress Report 2025



VATTENFALL

Introduction

The journey towards a fossil-free society demands transformative changes in how energy is produced and consumed—changes that will shape the lives of communities and individuals. At Vattenfall we recognize that these shifts carry profound social implications. That is why we are committed to upholding human rights across our entire value chain, striving to ensure that benefits of the transition are shared equitably and that no group or individual is left to shoulder disproportionate burdens.

Our human rights strategy is anchored in internationally recognized standards, including the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights. We operationalize these principles through the OECD's six-step due diligence framework, which guides us in identifying, assessing, and mitigating human rights risks throughout our operations.

In February 2025, the European Commission introduced the Omnibus package, aiming to streamline regulations and reduce administrative burdens for companies. While we welcome efforts to simplify compliance, we believe that meaningful, risk-based due diligence must remain at the heart of the Corporate Sustainability Due Diligence Directive (CSDDD). This approach empowers companies to conduct thorough assessments and take effective action on human rights risks.

As the EU regulatory process continues to evolve, Vattenfall remains steadfast in our commitment to continuous improvement in human rights. We actively communicate our progress, as reflected in our third stand-alone Human Rights Progress Report, which complements our 2025 Annual & Sustainability Report published in accordance with the EU Corporate Sustainability Reporting Directive (CSRD).



A handwritten signature in black ink, reading "Annika Ramsköld".

Annika Ramsköld, Vice President Sustainability

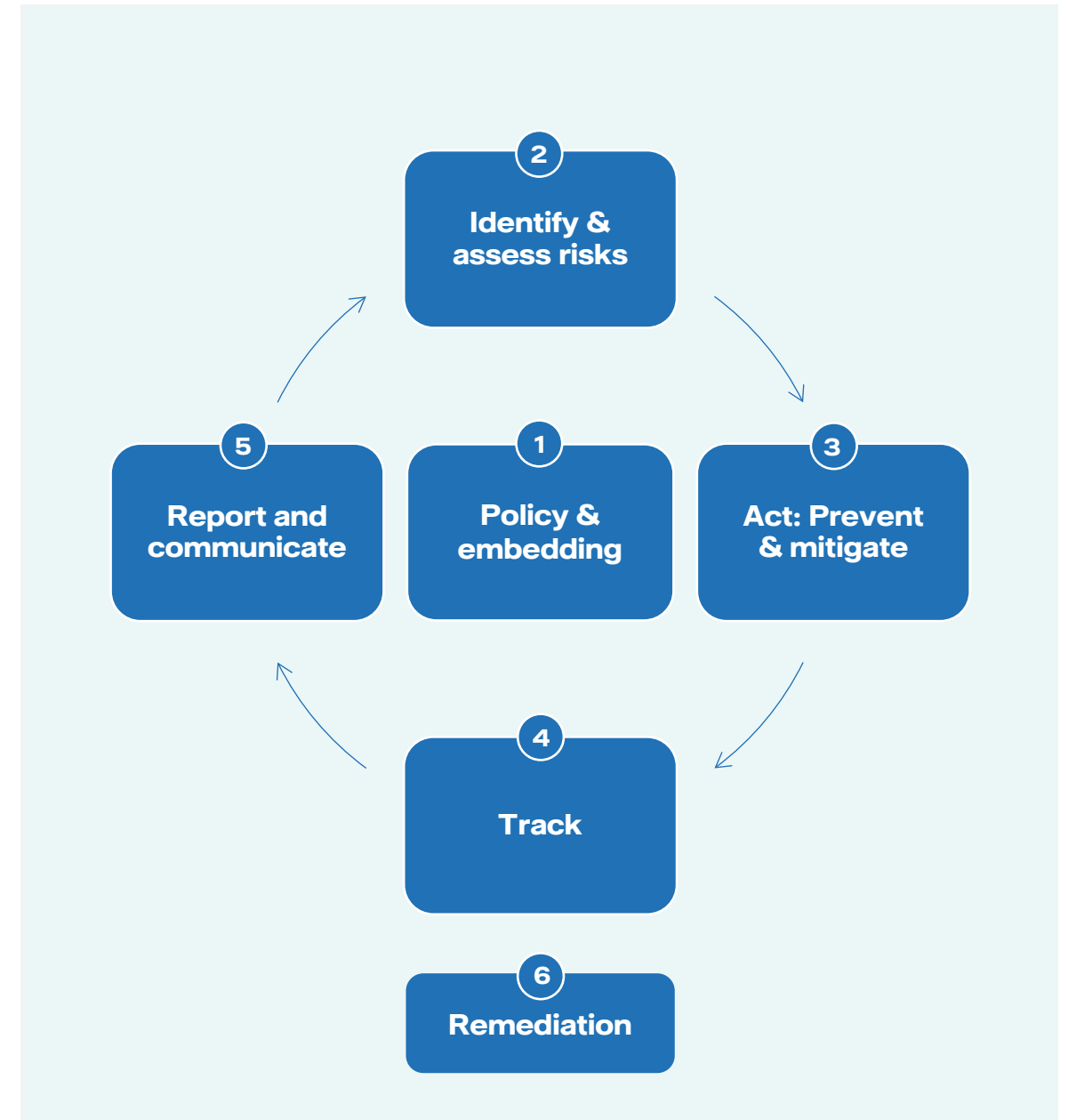
Vattenfall's approach to human rights

Vattenfall follows the OECD's six-step due diligence framework. The due diligence framework starts with the development of a human rights policy and the implementation of related processes. The second step involves identifying and assessing the most significant ('salient') risks for the company. The latest such in-depth assessment was conducted in 2021 and identified 16 human rights areas that are most relevant to Vattenfall. The specific findings for each area form the foundation for the next step in the framework: developing action plans to address these risks. At group level, Vattenfall published its Human Rights Action Plan, which focuses on nine prioritised human rights areas.

Tracking progress on the action plans, step four, is coordinated centrally. To ensure we direct our efforts appropriately, we conduct an annual human rights management review, assessing whether the prioritised human rights issues are still the salient issues for Vattenfall and if our governance is still effective. The learnings are used to further enhance our human rights work.

This **Human Rights Progress Report** addresses the fifth step in the due diligence framework and provides an update of Vattenfall's progress and challenges in the prioritized areas; highlighting the company's efforts to mitigate its negative impact on human rights and promote positive outcomes for the people it affects.

Step six, grievance and remediation, is handled by Vattenfall on a case-by-case basis.





Reader guide

This report will guide you through our progress on our Human Rights work in 2025, starting with the results of the 2021 human rights assessment, followed by short introduction about *progress reporting*. The next sections cover developments and challenges for 2025 in our governance and key human rights areas. We conclude the report with key take aways from the annual Human Rights Management Review, and our journey going forward.

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2021 Human rights assessment – foundation for progress

In 2021, we conducted our latest strategic Human Rights Assessment which identified 16 most relevant (“salient”) issues for Vattenfall. These issues were split into primary and secondary based on severity, likelihood, and number of people impacted. Third-party experts also assessed how well Vattenfall manages each issue, from no management to strong management. Based on salience of the issue and maturity level of management, Vattenfall prioritised **nine** human rights focus areas, with Health & Safety and Environment being managed very strongly. This report focuses on the remaining seven areas, with progress on Health & Safety and Environment being reported on [Vattenfall.com](https://vattenfall.com) and in the Annual & Sustainability 2025 report (to be published March 24, 2026)

Nine prioritised issues

1. Occupational health and safety
2. Environmental impact
3. Grievance and remedy
4. Indigenous peoples
5. Community engagement
6. Supplier and contractor labour conditions
7. Sourcing from high-risk countries
8. Just transition and responsible decommissioning
9. Human rights defenders

We continue to address all identified human rights issues, tracking progress and strengthening management where needed. Though lower-impact or well-managed issues are typically given secondary priority, this may shift if our annual Human Rights Management Review identifies significant changes in internal or external circumstances which would necessitate a reprioritisation. Any updates will be reflected in this report.

Primary (high in severity and likelihood, and high relevance for business action)	Level of Management	Secondary (Moderate severity and medium likelihood, and relevance for business action)	Level of Management
Occupational health and safety		Business ethics	
Environmental impact		Freedom of association and collective bargaining	
Grievance mechanisms and access to remedy ¹		Working conditions: working hours, wages and benefits	
Indigenous peoples		Privacy, data and cyber security	
Community engagement, livelihoods and cultural heritage		Non-discrimination and equality	
Supplier and contractor labour conditions, direct and indirect procurement		Land use, acquisition and resettlement	
Sourcing from conflict-affected or high-risk areas		Responsible use and development of technology	
Just transition and responsible decommissioning		Human rights defenders	

 Strong management  Some management  Little management  No management

¹ Grievance mechanisms and access to remedy is covered in the governance section of the report.

Progress reporting 2025

A way to visualize progress

In our first Human Rights Progress Report in 2023, we reported our progress based on key activities, challenges, and next steps. This approach provides a comprehensive overview of our developments and continuous improvement related to governance and prioritised human rights issues.

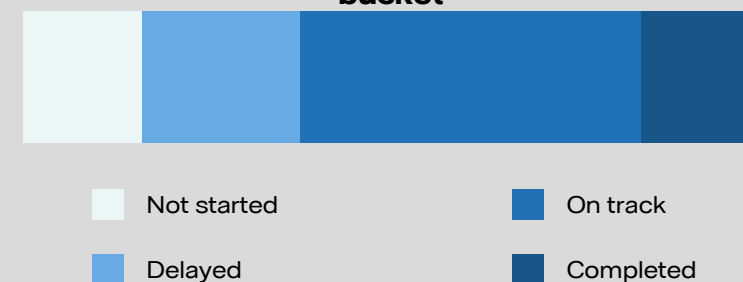
In 2024 we introduced a color-coding tool to visualize progress for each prioritised human rights issue and governance section, in addition to highlighting key activities, challenges, and next steps. The aim is to present an overall sense of progress in our human rights work using the 2021 Human Rights Assessment as the baseline. We monitor activities for each prioritised human right, labeling the status of progress from 'not started' to 'completed'. Over time, the share of 'completed' actions should increase, while the share of other categories should decrease.

Limitations

Human rights work evolves over time, which may necessitate adding new activities related to the 2021 recommendations. For example, we could complete the original recommendation, but in doing so, discover additional relevant activities as follow up. These will be included in the display on progress. However, in addition to the 2021 assessment, activities can be prompted by other sources such as the annual Human Rights Management Review and continuous improvement activities. These activities are *not* included in the color-coding tool. It is also important to note that not all activities have the same magnitude; being 'on track' for a substantial activity may require much more effort than completing a smaller one.

Nonetheless, as our objective is to provide a general sense of progress rather than a scientific measurement, we acknowledge these limitations.

Share of actions per status bucket



The size of the bar can be taken as a rough indicator for the share of activities in each phase.

Policy & embedding

Our commitment

Our commitment to respecting human rights is outlined in our [Human Rights Policy](#). The policy is reviewed yearly and updated as needed, following UNGP guidelines¹ and in consultation with both internal and external stakeholders.

Embedding human rights

In practice, the responsibility for driving human rights, sustainability performance and improvement initiatives, as well as complying with relevant policies and legislation, lies within each business area and staff function. The corporate Sustainability team acts as a support function and centre of expertise towards the whole group and can provide insights, guidance on prioritisation and direction, and other forms of capacity building on sustainability issues, including on human rights. An internal guideline describing roles and responsibilities linked to the OECD six-step due diligence framework, is available to all employees, in addition to a training on human rights.

Human rights issues are discussed on an annual basis by the Board of Directors and Executive Group Management. Vattenfall's CEO together with the Executive Group Management have the overall accountability for human rights within Vattenfall.

¹ UNGP: United Nations Guiding Principles on Business and Human Rights is a set of guidelines for States and companies to prevent, address and remedy human rights abuses



Performance indicator (2025)

Number

Human rights training participants
(procurement department)

262



Policy & embedding

Focus area

Progress 2025

Challenges & next steps

Update our Human Rights Policy, to further align with UNGP and OECD standards, by including additional commitments on our most salient risks

- Based on annual Human Rights Management Review, and the fact that CSDDD legislation is not yet finalized, we concluded that no significant changes to the Human Rights policy were needed
- Paused the study around the need for a separate Due Diligence Policy awaiting legislative developments
- Strengthened the integration of most salient supply chain related human rights risks in the Business Plan Directive

We continue to monitor developments triggering adjustments to our Human Rights policy and commitments, including CSRD and CSDDD.

We will update our Code of Conduct for Suppliers & Partners following our internal bi-annual assessment process and incorporate the latest developments in legal frameworks

Ensure we fulfil the spirit of existing and upcoming human rights due diligence laws and go beyond minimum requirements by having positive impact

- Following the high-level gap analysis of our human rights due diligence framework against CSDDD in 2024, we initiated a group-wide project to ensure compliance, including an in-depth legal analysis. The majority of the project has been paused due to the regulatory uncertainty surrounding the simplification proposals in the Omnibus. Nevertheless, we continued developing our existing due diligence practices (see pages 9 and 10)

We will continue to closely monitor developments related to the Omnibus and CSDDD regulations. Once finalized, the internal CSDDD project will resume to ensure Vattenfall's full compliance.

Secure closer involvement of Business Areas and Staff Functions working on human rights and establish clearer ownership throughout Vattenfall for the ambitions set

- Developing formalized governance for human rights at Vattenfall Group, to establish clearer ownership and mandate throughout Vattenfall
- Enhanced and formalized our annual Human Rights Management Review, assessing whether developments in Business Areas / Staff Functions or external developments require adjustments of our human rights work

We aim to finalize and embed formal human rights specific governance throughout Vattenfall, including activating a network of experts for efficient and effective management of cross-functional issues.

Human rights due diligence

Introduction

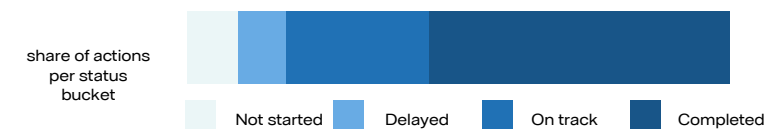
Vattenfall is committed to actively manage potential and actual negative impacts on human rights that may arise from our operations. This is important not only to meet the needs of rightsholders but also to understand and mitigate risks associated with the energy transition. Failing to understand these risks can negatively impact the transition.

Conducting due diligence

Vattenfall believes robust risk assessment frameworks are essential for effective due diligence. As a result, we conduct both long-term as well as operational, annual, and ad hoc assessments related to human rights. The results of these assessments form the basis for integrating requirements into decision-making processes and setting expectations for our own organisation, suppliers, and partners. Monitoring and tracking are natural parts of follow-up. However, assessing the impact of our actions poses a challenge, as establishing robust indicators to track long-term outcomes continues to be difficult.



Performance indicators (2025)	Number
Supplier screenings	9083
Supplier audits	79



Human rights due diligence

Focus area

Progress 2025

Challenges & next steps

Strengthen our approach to assess and address impacts stemming from our transition to become fossil-free

- Contributed to developing sustainability standards and guidelines in the Solar Stewardship Initiative
- Contributed to the International Responsible Business Conduct Agreement and German Energy Sector Dialogue
- Consolidated our collaborative approach addressing salient human rights in industry associations, expert networks, and Dutch Social Economic Council

For salient issues deeper in the supply chain, it remains hard to gain leverage to address impacts. Thus, we will continue to actively participate in the Dutch and German multi-stakeholder initiatives and Solar Stewardship Initiative.

We will increase our engagement with peers and experts to implement CSDDD requirements in a meaningful way.

Increase integration of our human rights risks assessment methodologies in daily operations and decision-making processes

- Significantly improved deployment of supply chain risk assessment by having relevant indicators on Leadership Dashboards
- Initiated additional category-wide enhanced due diligence for the Fleet-related battery supply portfolio
- Integrated sustainability - including human rights - in approach to product category strategies

We will map influential processes and key decision points to assess where further integration of human rights in decision-making could be meaningful.

Another objective is to incorporate risk profiling into procurement platforms, including supplier qualification processes and supplier dashboards.

Further embed conditions and expectations on the most salient human rights risks in supplier contracts or other written agreements with partners

- Enhanced the Sustainability Requirements Explorer platform (SURE) to further enable procurement professionals to integrate sustainability criteria in tenders
- Introduced a mapping of salient human rights issues against our product categories to be more focused in our supply chain work
- Began further integration of sustainability due diligence into acquisition and divestment processes
- Provided human rights due diligence e-learning to several solar industry related suppliers

We aim to improve our ability to target specific risks by enhancing the way we work with category strategies and supplier segmentation.

Beyond supply chains, we will enhance human rights-related criteria in our existing merger and acquisition processes to proactively assess potential risks.

Grievance & Remediation

Our approach

The inability for rightsholders to lodge complaints and grievances can potentially lead to human rights impacts remaining unresolved. Vattenfall is committed to provide appropriate forms of remedy in cases where Vattenfall has directly caused or contributed to negative human rights impacts. The type of remedy is determined on a case-by-case basis depending on the degree of severity and our connection to the impact.

For Vattenfall to identify where we have caused or contributed to adverse human rights impacts, it is crucial that we have adequate, accessible and effective grievance mechanisms, where rightsholders can voice their concerns. Rightsholders with whom we engage include, but are not limited to own employees, workers in our supply chain, business partners and community members.

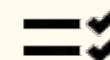
Ways to raise concerns

We provide multiple different channels for rightsholders to raise concerns. These include:

- Vattenfall's web-based Whistleblowing Channel. This channel is open 24/7, 365 days a year and anyone reporting has the option to remain anonymous
- Directly to our Group Internal Audit department or our Whistleblowing coordinators
- For local communities, we also offer direct contact with project managers, stakeholder engagement managers or other staff, for example via project web sites, phone or email

For more information about our whistleblowing process, please visit [our website](#).

Whistleblowing process at Vattenfall

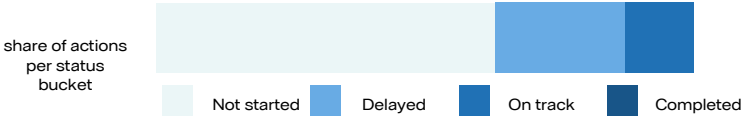


An individual submits a report to the Whistleblowing function, e.g., through the online Whistleblowing Channel.

The national Whistleblowing coordinator of Vattenfall confirms receipt of the report. If the reported concern requires investigation, an investigation team is appointed. Investigations are typically carried out by auditors from Vattenfall's Group Internal Audit, HR, Legal or Corporate Security & Resilience departments.

The auditors gather and analyse relevant information, e.g., by seizing documents and conducting interviews.

If misconduct or deficiencies are confirmed, relevant follow-up measures are taken, such as improvements to internal working procedures, steps governed by labour laws for individuals or termination of contracts.



Grievance & Remediation

Focus area	Progress 2025	Challenges & next steps
Further increase alignment of grievance mechanism with the 8 UNGP’s effectiveness criteria, including enhancing transparency and accessibility, through tailored communication vis-à-vis rightsholders	As a result of EU developments and regulatory uncertainty, coupled with scarce resources, we made the decision to deprioritise enhancements to grievance channels in 2025	Regulatory uncertainty, as long as it persists, will continue to hinder action. Nonetheless, our commitment to provide accessible and transparent grievance mechanisms and remediation processes remains high - a commitment that includes ensuring rightsholders not only have access to but also trust our grievance mechanisms.
As our whistleblowing systems evolve to align with upcoming legislation, ensure our systems stay accessible and comprehensible	- Adopted minimum standards and complementary guidelines on stakeholder engagement, including compliance requirements for accessible and transparent grievance channels in all operations - Developing formalized governance for human rights, including clarifying ownership and mandates across Vattenfall, supporting future compliance of grievance channels	Once final regulatory guidance is available, we will further enhance our group grievance channel to ensure compliance with legal requirements. This will include building on previous efforts to improve transparency and accessibility of grievance channels beyond first-tier suppliers.
Improve data tracking of grievance reporting systems across our operations and geographies, to be able to identify, analyse and report on more aggregated data, including on remedy	As the work on enhancing our grievance channels has been put on hold during 2025, pending EU decisions on CSDDD, no additional actions were taken regarding tracking and aggregation of data	Ensuring compliance of grievance channels—including better tracking and aggregation of human rights-related complaints—will be a key focus of our ongoing work in 2026.

Community engagement

Risk/Impact

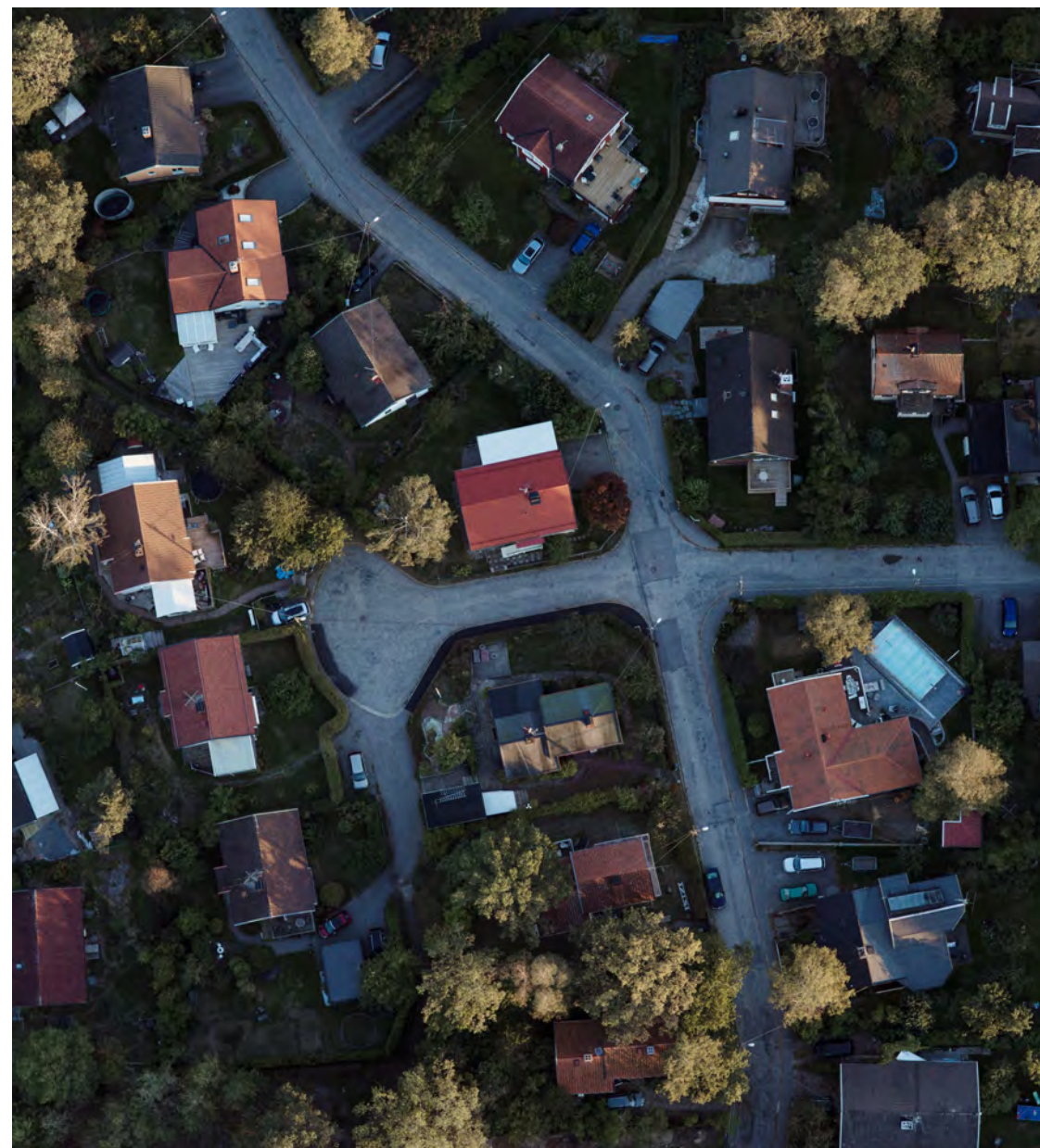
Producing and distributing energy will inevitably impact local communities. Vattenfall's most prominent impact stems from the development of new wind parks, solar farms and heat and electricity networks. Examples of impact could be disturbance from construction or changes in scenery in affected territories. However, by engaging stakeholders in a meaningful way we can mitigate negative impact and create value in the communities where we operate.

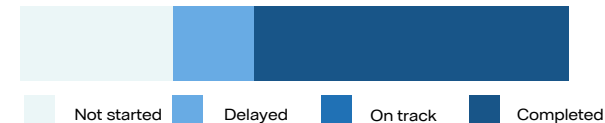
Risk management

We comply with local regulatory standards regarding consultation and social impact assessments, and we also seek to go beyond minimum requirements, for example regarding supporting community-based initiatives and engaging local workforce and businesses. We strive to engage stakeholders as early as possible, while also providing them with context and stakeholder-appropriate channels to raise concerns during and after projects are completed, with a particular attention given to seldom heard or vulnerable groups.

Ambition

Vattenfall wants to operate in an inclusive way that recognizes communities' needs and interests in order to minimize our negative impacts and maximize our positive impacts on the livelihoods of the communities in which we operate.



share of actions
per status
bucket

Community engagement

Focus area

Progress 2025

Challenges & next steps

Improving our ability to meaningfully engage with local communities on their needs and expectations

- Finalized minimum standards on stakeholder engagement in alignment and anticipation of CSDDD
- Created an online platform with tools, templates, and examples to operationalise the minimum standards and to facilitate internal knowledge sharing and collective learning
- Continued collaboration via internal community engagement working group to support implementation across the business

With the development of our Group standards for community engagement, we have reached an important milestone towards enhancing internal governance structures and engagement processes. A key step moving forward, is to facilitate learning and ensure their effective implementation internally.

Further developing our ability to identify and address our positive and negative impact on communities we operate in

- Conduct ongoing engagement activities intended to strengthen community ties and uphold commitment to local development
- An example of such activities was the Cabrach Trust's Picnic & Games 2025, funded through Clashindarroch Onshore Wind Farm Community Benefit Fund. The event reflects the fund's support for heritage restoration, nature conservation, volunteer training, and community infrastructure

Effectively managing the varied and occasionally conflicting interests and needs of our diverse stakeholders continues to be a key challenge in community and stakeholder engagement. We collaborate with local organisations to build knowledge and experience, continually enhancing our engagement efforts.

Enhancing transparency on our engagement and addressing impacts

- Increased access to wind farms in the UK through school visits, in part leading to hundreds of visits at Pen y Cymoedd windfarm this year

By sharing best practices internally, we deepen our understanding of the diverse impacts on affected communities and their respective needs as well as how those can be effectively approached through collaborative solutions. As part of this work, we seek to build local awareness and increase access to our assets.

Indigenous peoples

Risk/Impact

Parts of Vattenfall's operations are located in Sápmi, an area in Northern Sweden inhabited by the Sámi people. The Sámi people are indigenous peoples and hold specific rights according to both Swedish law and international human rights principles. Vattenfall's impacts on the Sámi stem from construction, operation and maintenance of our assets, such as wind farms, hydropower plants and grid networks.

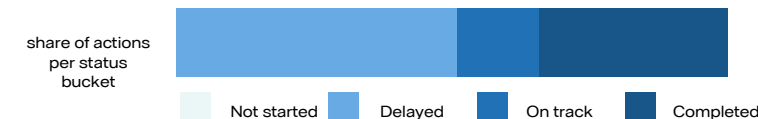
Risk management

To prevent and mitigate negative impact on the Sámi people, including on reindeer husbandry which is a fundamental part of the Sámi culture, we have clearly defined stakeholder engagement processes in place. These processes vary depending on each project and the needs/preferences of the potentially affected community but are informed by Vattenfall's principles stated in ["Approach towards Indigenous peoples in Sweden"](#).

Ambition

Vattenfall wants to secure that the cultural and heritage rights of indigenous peoples in the areas where we operate are respected in the energy transition.





Indigenous peoples

Focus area

Progress 2025

Challenges & next steps

Strengthening our governance and internal capacity to respect the rights of indigenous peoples

- Included requirements to respect indigenous peoples' rights in the minimum standards on community engagement, complementing our Approach towards indigenous peoples in Sweden¹
- Held a full-day workshop for employees working in business areas with potential impact on the Sámi, focusing on improving dialogues with indigenous communities in Sweden and elaborating on alternative forms of remediation
- Carried out internal training sessions on human rights due diligence & rights of indigenous peoples

Enhancing our capacity to recognize and address adverse impacts from our activities relies on ensuring our staff possess a strong understanding of Sámi rights and cultural heritage, including compliance requirements on due diligence and community engagement as embedded in the new minimum standards.

Enhancing our transparency on our engagement and consultation practices

- Joined CSR Sweden round table discussions on community engagement with Sámi villages, alongside companies in northern Sweden, Sámi organisations (including the Truth Commission for the Sámi people), and academia

Building this knowledge base and supporting employees with tools and resources remain key priorities for our organisation. We have therefore continued to enhance our internal training focused on Sámi rights in the context of human rights due diligence. Looking ahead, a key priority will be to adapt the training to suit the specific needs of different teams and business units.

Engaging proactively with indigenous peoples on ways to mitigate negative impacts and enhance positive impacts where possible

- Continued our efforts to deepen collaboration with Sámi communities, landowners and local stakeholders in northern Sweden. This work aims to improve the conditions for reindeer husbandry and long-term cooperation through actions going beyond financial compensation – e.g., through supporting land adaptation, constructive consultation processes, and joint planning

We will also continue emphasizing dialogues and collaborations with Sami communities and stakeholders.



Supplier & contractor labour conditions

Risk/Impact

Vattenfall recognizes that labour conditions and challenges vary between countries, sectors and supply chains. Work carried out both at our own sites and throughout our supply chain can pose risks related to labour conditions. As such, Vattenfall aims to ensure that workers' rights are respected and that workers are treated fairly.

Risk management

To manage risks associated with labour conditions, Vattenfall uses several tools, including the Supplier Risk Assessment Tool (SRAT) Light, audits, and screenings. SRAT Light identifies and assesses supplier's and contractor's sustainability risk(s) and defines a suitable response. In addition, Vattenfall conducts audits against our Code of Conduct for Suppliers and Partners, where topics related to labour conditions on sites are reviewed. We also perform screenings of potential and current suppliers and contractors to identify risks. These tools help Vattenfall identify and mitigate actual and potential risks related to labour conditions. Additionally, Vattenfall includes requirements related to labour conditions in tenders and engages with suppliers and contractors on this topic.

Collaboration is essential to have a greater impact, which is why we participate in various industry initiatives and engage with different stakeholders, including suppliers and contractors, exchanging best practices and expertise.

Ambition

Vattenfall aims to engage with suppliers and other stakeholders to raise labour condition standards in our supply chains to ensure that they are fair.



share of actions
per status
bucket

Supplier & contractor labour conditions

Focus area

Progress 2025

Challenges & next steps

Enhance our risks assessments by conducting category specific risk assessments and follow up enhanced screening of suppliers

- Engaged with category managers on risks and impacts related to labour conditions, focusing on Health & Safety (H&S) and Forced Labour (FL) as material topics in the DMA¹
- Established clear roles and responsibilities between Health & Safety, Procurement and Sustainability
- Developed Workers Voice survey and started engagement with a supplier for pilot implementation.
- Tested supply chain transparency software solution to evaluate its capabilities to further support Vattenfall in identifying risks, such as human rights related risks, and increase transparency in different supply chain

We will initiate full collaboration between Health & Safety, Procurement and Sustainability aiming to establish targeted initiatives to improve H&S and FL in the supply chain and continue efforts on contractors.

We aim to develop an approach for selected high-risk supply chains for value chain worker engagement. This starts by creating a pipeline of tools for piloting, including Workers Voice, union engagement and other methodologies.

Increase engagement with key internal and external stakeholders specifically around labour conditions

- Continued active participation in several industry initiatives, such as the German Energy Sector Dialogue and the IRBC Agreement
- Tested the finalized Worker Welfare Toolkit in several business units and provided feedback to IRBC.
- Researched value chain workers engagement tools and methodologies

We will evaluate the results of the tools to assess a wider roll-out aiming to create positive impact in the supply chain and develop measurements to follow up on actual impact of these efforts.

We will continue our participation in different multi-stakeholder initiatives to share and learn with peers, tackle shared challenges together where individual leverage is insufficient to achieve progress.

Continue to strengthening requirements towards suppliers connected to labour conditions

- Introduced the living wage concept to different business units aiming for practical implementation pilots. This resulted in a Share & Learn session with a strategic supplier to discuss progress on living wage

Sourcing from high-risk areas

Risk/Impact

Vattenfall's operations are not located in conflict-affected or high-risk countries. However, we procure fuels, products, and technologies which come directly from conflict-affected or high-risk areas, or which contain components or minerals originating from these areas. Our transition to fossil freedom will increase our need for technologies such as wind turbines, solar panels, and battery storage, which contain materials largely mined in high-risk areas. These include, for example, cobalt mined in Congo, copper from Peru, Rare Earth Elements (REEs) from China or aluminum from Guinea.

Risk management

We manage the risks of sourcing from high-risk areas by assessing our first-tier suppliers based on their country and product category. We conduct controls such as audits and investigations and implement corrective action plans for suppliers operating in high-risk countries or industries. For risks beyond our first-tier suppliers, we collaborate with our suppliers and partners or engage in multi-stakeholder dialogue. Transparency remains a challenge for high-risk areas deeper in our supply chain.

Ambition

Vattenfall's ambition is to proactively manage and minimize potential impact connected to sourcing from conflict affected and high-risk areas in order to support a responsible energy transition.





Sourcing from high-risk areas

Focus area

Progress 2025

Challenges & next steps

Enhance upstream supply chain transparency and understand impact on people and planet

- Launched a pilot to enhance transparency in selected supply chains to understand the impacts, risks and opportunities beyond Tier 1
- Assessed the impact of mining on biodiversity as an additional risk connected to sourcing high-risk minerals
- Requesting component traceability reports from specific high-risk product categories suppliers

Collaborate with our suppliers on ways to mitigate risks, like design optimization, substitution or recycling

- Continually engage with key suppliers and contractors to address issue of sourcing from high-risk areas
- Began collecting data on the volume of key materials
- Committed to a 100% circular outflow of permanent magnets and composite materials from decommissioned wind turbines by 2030
- Applied an enhanced due diligence process for bioenergy feed coming from outside the EU-recognized voluntary certification schemes

Drive momentum on the topic by influencing industry collaborations' sustainability agenda's

- Participated in a collective action to mitigate human rights risk of bauxite mining in Guinea as part of the German Energy Sector Dialogue, uphold a cable supplier engagement event and developed a toolbox for responsible procurement practices
- Participated in a collective action focused on responsible practices in artisanal and small-scale copper mining in Peru from the IRBC Agreement
- Participated in Solar Stewardship Initiative
- Participated in the World Nuclear Assoc. ESG working group
- Supported the Gas Taskforce initiated by RECOSI, designing a due diligence framework for natural gas

To deliver on our strategy, we rely on products potentially containing components or materials that may come from high-risk regions. Consequently, these challenges are likely to persist and may become more complex due to emerging issues such as forced labour risks in mineral processing, biodiversity concerns linked to mining activities and increasing geopolitical tensions.

To mitigate these risks, the following measures should be pursued:

- Sustaining collaborative efforts through industry initiatives to increase leverage
- Further mapping of critical supply chains
- Integrating biodiversity considerations into mineral sourcing approaches
- Evaluating involvement in mining standards to strengthen engagement across the supply chain
- Launching a preparedness initiative to address and manage supply chain risks in Conflict Affected and High-Risk Areas



Just transition & responsible decommissioning

Risk/Impact

Addressing the climate crisis requires a massive shift across systems in the ways we operate, physically, economically, and socially to reach net-zero greenhouse gas emissions by 2050. The transition to net zero will have impacts on employees, local communities, customers, and industries throughout global value chains. For example, communities may be impacted because of building new fossil-free energy projects, consumers may face accessibility or affordability challenges which hamper their ability to participate in the transition, while employees could be impacted by the transformation or closure of fossil-based assets.

Risk management

Given the broad scope of the concept of “just transition” and the various types of potential impacts and impacted stakeholders, there are a multitude of risk management tools in place, many of which are listed for the other prioritised focus areas.

Ambition

Vattenfall will enhance its role in delivering a just transition by formalizing our efforts and further embedding the aims of the just transition into the way we operate and make decisions.



share of actions
per status
bucket

Not started Delayed On track Completed

✦ Just transition & responsible decommissioning

Focus area

Progress 2025

Challenges & next steps

Continuously reviewing and prioritising stakeholders in our value chain based on the severity of potential impact and our leverage

Strengthening internal policies, processes, and external disclosure

Engaging in external collaborations to improve our awareness of best practice and our ability to create positive impact

- Just Transition remains an umbrella concept to which the other prioritised areas contribute
- Some items which fall more directly here:
 - We continue to pay all employees a living wage, and encourage our suppliers to do the same
 - We are exploring the integration of Just Transition considerations into standardized M&A practices
 - Transition planning continues to be discussed at management level

As assets or units heavily reliant on fossil fuels accelerate their transitions, it is important that these transitions, gradual or abrupt, are adequately planned for, and that affected employees are treated fairly. Striking the balance between business imperatives, uncertainty of the scale and timing of the transitions, and proactive engagement with employees is often difficult; thus, developing broadly-applicable policies is extremely challenging. However, dialogues will continue, with the aim of strengthening practice, even in the absence of policy.

⚖️ Human rights defenders

Risk/Impact

The risk for human rights defenders is highest in countries where internal armed conflict or severe civil unrest exists, or which are characterized by political instability or repression. Vattenfall does not have operations in such countries; however, we are aware that certain fuels, products, and technologies we source are coming from or are processed in high-risk areas. Vattenfall recognizes that human rights defenders are important partners in identifying risks in our value chain. As the safety of human rights defenders is deteriorating, it is a focus area even though we have limited leverage.

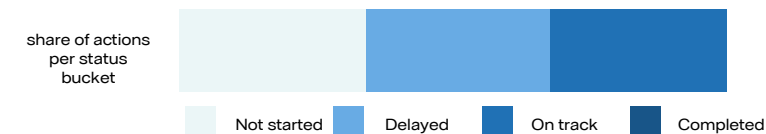
Risk management

To manage the risk to human rights defenders in our supply chain, we assess first-tier supplier risk based on the manufacturing or service provisioning country and the product category. When the assessment indicates a potential risk for human rights defenders at our first-tier suppliers or deeper in the supply chain, we initiate case by case dialogues with our supplier to address our concerns and understand how they manage the risks.

Ambition

Vattenfall wants to actively contribute to safeguard the lives and safety of human rights defenders connected to our value chains.





Human rights defenders

Focus area

Progress 2025

Challenges & next steps

Increase our understanding of human rights risks to defenders connected to our value chains and our ability to address these risks

- Researched the contexts and countries where human rights defenders face the greatest risks, mapping specific sectors and countries, and evaluating potential connections to Vattenfall's value chains
- It was found that Vattenfall currently has limited leverage and ability to directly engage with, and support, at-risk human rights defenders

Engage with suppliers and partners to identify and implement actions that support protecting the rights and lives of human rights defenders

- Achieved engagement opportunities through multi-stakeholder initiatives, which facilitated connections between companies and human rights defenders in countries such as Guinea and Myanmar

Continue to strengthening policies and requirements in line with our increased knowledge and best practices

- Conducted a benchmark on approaches to including human rights defenders in policies
- Strengthened the Human Rights Policy, referencing the value of human rights defenders in enhanced due diligence

- Due to limited transparency and challenges in engaging directly with human rights defenders on the ground, enhancing Vattenfall's performance in this area remains a challenge.
- We will continue our participation in multi-stakeholder initiatives to strengthen our impact on workers and human rights defenders across the value chain.
- As it is important to continuously monitor the environment for human rights defenders as well as evolving stakeholder expectations, we will establish an annual review of their risk exposure within Vattenfall's value chains.

Reflecting on our human rights work

Introduction

To keep up with a changing business and a shifting landscape of emerging risks, heightened business impact and stakeholder expectations, and legal developments, we conduct an annual review of our approach towards human rights, in addition to the strategic assessment which is conducted every three to five years. It is important to assess our human rights context and efforts annually to be able to (re)prioritise future action and resources.

Methodology of Vattenfall's annual assessment

We conduct the assessment from three different perspectives:

1. *Issue lens*: internal experts evaluated changes to the salience and/or scope of the 16¹ identified human rights issues. They also reviewed the suitability of the methodologies used to assess and mitigate risks associated with these changes.
2. *Business lens*: business stakeholders assessed changes to e.g., their organisations, geographies, product ranges and supply chains. Business stakeholders and human rights experts discussed how these affect the human rights risks that we face and whether we need to change our practices.
3. *External lens*: a third-party expert reviewed the results of parts 1 and 2 to understand the shifts in our business. Based on this and their view on external trends, they provided advice on the continued salience of the 16 human rights issues and insight into emerging topics, if any.

The 2025 human rights management review highlighted several areas for improvement, which we integrate in our human rights approach or the coming year and beyond. Additionally, we continue to share our methodology with peers and experts to gather feedback and insights, helping us further refine and strengthen our approach.



1. See page 5 for the 16 identified human rights issues

Continuing our human rights efforts

The annual assessment indicated that the current approach to human rights is still adequate, though again several improvement opportunities were identified. The following points are linked to the relevant OECD framework step.

2 Identify and assess risks

Based on the 2025 review, the following primary conclusions have been identified:

- The existing prioritised human rights issues remain relevant for Vattenfall. A shift in prioritisation may occur following our next in-depth human rights impact assessment (2026)
- Overall, prioritised issues are managed adequately. However, it's important to continue to monitor and ensure the efficacy of our controls

During the review, we assessed the human rights risk framework. The findings are as follows:

- Risk management for supply chain-related risks has improved, particularly in tracking the implementation of risk assessments and subsequent follow-up actions
- However, evaluating the adequacy of risk management for specific issues—such as local community engagement—requires a more tailored approach. The current standardized questions do not provide clear results, making it difficult to determine whether our risk management practices are adequate

3/4 Act: prevent, mitigate and track

Using our 2021 Human Rights Impact Assessment as our baseline, we are generally on track with our planned actions.. Based on the annual review, we will:

- For the salient human rights risks connected to our supply chains, prioritise health and safety of value chain workers and forced labour
- Implement the community engagement standards and continue the cross-functional network
- Renew efforts on Just Transition, specifically connected to divestments and the transition towards fossil freedom
- Continue to review indicators for monitoring actual impact

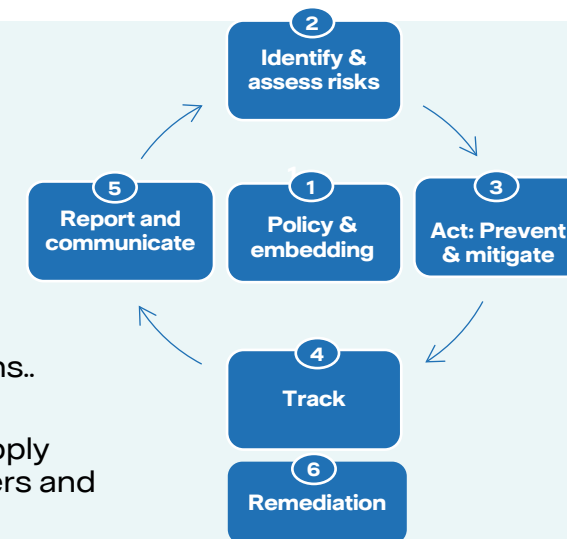
5 Report and communicate

This is our third independent Human Rights Progress Report, supplementing our 2025 Annual & Sustainability Report, which also addresses some aspects of our human rights efforts.

In our upcoming human rights impact assessment, we will evaluate whether a separate human rights report remains appropriate given current legal frameworks and stakeholder expectations.

Summary

Overall, we gained important insights into how our human rights framework operates, which we will consider as we prepare for the next strategic human rights impact assessment planned for 2026.



"Despite the postponed due diligence legislation, we remain committed to our efforts. Looking ahead, it is important that we maintain our momentum, ensure transparency and predictability for our stakeholders, and fulfill our commitments.

We will continue to drive fossil freedom in a just and responsible way."

Annika Ramsköld