

Human Rights Policy

April 2022

“Respecting human rights is a fundamental part of enabling fossil-free living for all of our stakeholders”

Anna Borg, CEO Vattenfall



VATTENFALL

Human Rights Policy

April 2022

Our commitment

In line with our goal of enabling fossil-free living within one generation, we are committed to respecting the internationally recognised human rights of all rightsholders throughout our full value chain, including vulnerable groups. We expect our counterparties to do the same, as defined in the counterparty code of conduct. In line with the UN Guiding Principles for Business and Human rights (UNGPs), in cases where local law and international human rights standards differ, we strive to follow the higher standards while complying with local laws. In case of direct conflict between the two, Vattenfall will adhere to local law while seeking ways to respect human rights to the greatest extent possible.

In practice, we commit to:

- Adhering to the UNGPs, OECD guidelines for Multinational Enterprises, ILO's eight fundamental conventions, and the principles of UN Global Compact.
- Promoting diversity and inclusion in our own organisation and beyond.
- Treating everyone with dignity and respect and working against all forms of child labour, modern slavery, harassment, and discrimination throughout our value chain.
- Providing safe and healthy working conditions, fair working hours, fair wages, and benefits.
- Supporting community engagement in our value chain and respecting indigenous peoples' rights.
- Extending our sphere of influence by using our leverage directly and with partners to go beyond respecting human rights and to deliver positive human rights impacts.

Managing our human rights risk and impacts

We regularly and 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.

Vattenfall's human rights risk assessment identified salient risks throughout our value chain, including community engagement, livelihoods, and cultural heritage; environmental impacts; grievance mechanisms and access to remedy; indigenous peoples; just transition and responsible decommissioning; occupational health, safety and security; sourcing from conflict-afflicted or high-risk areas; and supplier and contractor labor conditions.

Our aim is to continuously improve our ability to manage human rights risks and to have a positive impact. This is a journey and will be driven not least by raising the awareness of among our employees, suppliers and other stakeholders. We acknowledge the importance of accessible grievance mechanisms and remediation. We have an independent whistle blowing system available to stakeholders to report perceived irregularities concerning Vattenfall.

In practice, we commit to:

- Performing trainings to raise awareness of human rights issues, including those that impact Vattenfall internally in the broader aspect of diversity and inclusion.
- Engaging with suppliers through dialogues, onboarding processes, audits, assessments, and corrective action plans to minimize adverse human rights impacts.
- Working for the right to freedom of association and collective bargaining in our supply chain.
- Encouraging open stakeholder feedback through interviews, surveys, questionnaires, focus groups, and regular materiality analyses.
- Offering open and transparent engagements with stakeholders who may be affected by our operations, such as indigenous peoples.
- Working to remedy adverse human rights impacts caused or contributed to by Vattenfall's operations.
- Monitoring and assessing our human rights related actions.
- Reporting regularly and transparently on our human rights work.

The Human Rights policy is approved by the Board of Directors. It should be read together with other Vattenfall policies. Vattenfall's CEO, together with Executive Group Management, has the overall accountability for human rights within Vattenfall. Vattenfall's Policies are open, commonly accessible, valid throughout the entire Group, and valid for all employees.