

## WESTERMOST ROUGH LIMITED

Westermost Rough Limited is jointly owned by Ørsted Westermost Rough Limited (50 per cent) and WMR JV Investco Limited (50 per cent). Ørsted Westermost Rough Limited is a wholly-owned subsidiary of Ørsted A/S.

Ørsted Power (UK Limited is the operator of the wind farm under an O&M agreement, which expires in June 2030, and is also a wholly-owned subsidiary of Ørsted A/S and a part of the Ørsted group ("Ørsted").

As the wind farm is ultimately operated by Ørsted, the board of directors of Westermost Rough Limited has considered and adopted the Modern Slavery Statement of Ørsted, a copy of which is annexed.

This statement was approved by the Board of Directors of Westermost Rough Limited.



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Philip H. de Villiers  
Director, Westermost Rough Limited

## ØRSTED MODERN SLAVERY STATEMENT 2017

This statement is published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by the Ørsted entities covered under the provisions of the Modern Slavery Act in 2017 to prevent modern slavery in its business and supply chains. This statement is intended to fulfil the legal requirement for a slavery and human trafficking statement on behalf of all Ørsted entities in scope. Our efforts against slavery and human trafficking complement our broader Sustainability Commitment and our adherence to the UN Global Compact.

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### 1. Our Business and supply chain

In Ørsted, we want to create a world that runs entirely on green energy. We want to revolutionise the way we power people by developing green, independent and economically viable energy systems. We do so by continuously investing in our competitiveness and core competences to create opportunities for long-term, profitable growth within renewable energy.

Our business activities consist of three areas: offshore wind, utility business, as well as a portfolio of new long-term green growth options.

- As market leader in building offshore windfarms, we continuously work to deploy more offshore wind capacity and strengthen its competitiveness against other energy technologies.
- For several years, we have been committed to converting our power stations to use sustainable biomass. In 2017, we decided to phase out coal by 2023.
- We also work to help our business and residential customers use energy more effectively through energy savings and modernisation of the power grid. In 2017, we therefore decided to cover all our residential customers' power consumption with green power generated by our offshore wind farms at no additional cost for them.
- Finally, in 2017, we completed the divestment of our upstream oil and gas business.

We are headquartered in Denmark but have a strong presence in North-western Europe with positions in the US and Taiwan. We have an ambitious plan for maintaining and strengthening our global, market-leading position in offshore wind and continue to expand in both existing and new markets.



We rely on a highly skilled workforce of 5,638 employees to operate our business.

Ørsted had an annual turnover of DKK 59.5bn in 2017.

Ørsted has over 22,000 suppliers worldwide and across diverse industry sectors: heavy manufacturing, construction, maritime services, as well as raw materials such as biomass and coal.

## 2. Risk mitigation of modern slavery in own operations

### 2.1. Policies

At Ørsted, responsible business conduct is fundamental to how we do business. Our approach is outlined in a number of policies.

We have an overarching policy on sustainability - our [Sustainability Commitment](#). In this policy, we commit to running our business in a way that supports the UN Sustainable Development Goals. We have incorporated into this policy our commitment to safeguard and strengthen labour and human rights and promote fair and safe working conditions across our operations and our global supply chains.

### 2.2. Governance

At Ørsted, the governance responsibility for our sustainability performance lies with the business at the relevant levels of the organisation, with the Board of Directors as the highest authority. Our Sustainability Committee, which is chaired by our CFO, oversees that we live up to our Sustainability Commitment and monitors the progress of our all our programmes.

In 2017, we conducted our biannual human rights risk screening. To understand our human rights risks, we conducted 15 interviews with Ørsted employees who lead work that has a direct link to our rights holder groups – our employees, our customers, our communities, and our business partners. During the interviews, we assessed how our business activities could potentially have adverse impacts on the rights holders. The assessment also evaluated our capacity to identify potential risk areas and current mitigation strategies to address them.

The screening concluded that we manage our most significant human rights risks well, and that we mainly operate in low-risk environments. However, new markets represent new focus areas related to human rights. Modern Slavery was, however, not assessed to be a salient risk in our 2017 screening.

We also operate a **Whistleblower Hotline** which can be used by employees, business partners, customers, and any other stakeholder to report serious concerns in a secure and confidential way. All reports will be fully investigated and appropriate remedial actions taken. In 2017, there were no cases regarding Modern Slavery.

### 3. Risk of modern slavery within our supply chain

#### 3.1. Policies

We have applied our [Code of Conduct for Business Partners](#) to all our suppliers since 2006. The code is aligned with international standards, including the UN Guiding Principles on Business and human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. The code outlines our expectations regarding compliance with applicable law and respect for labour and human rights. It includes provisions on forced labour, hiring practices, child labour, as well as working hours, remuneration, harassment, abuse, and disciplinary measures.

#### 3.2. Governance

At Ørsted, we hold ourselves and our business partners to the highest standards of integrity and corporate responsibility. We developed our Responsible Business Partner Programme (RPP) to assess and improve the social, environmental, and ethical performance of our suppliers and joint venture partners. Through this platform, we implement a risk based process of due diligence.

The programme is aligned with the International Labour Organization conventions, the United Nations Global Compact principles, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the UK Bribery Act, and the UK Modern Slavery Act

The programme assesses business partner compliance with our Code of Conduct identifying opportunities to promote and improve responsible business practices.

This includes:

- Business partner acceptance of our expectations as set out in our Code of Conduct regarding compliance with laws and regulations, respect for human rights, protection of the environment, and commitment to prevent corruption and bribery.
- Risk Screening of both new and existing business partners based upon the risk profiles associated with the sector and the countries of production
- Assessment of business partner performance against our expectations through self-assessment questionnaires and/or site assessments

- Follow-up with our business partners in the development of improvement plans to address areas of non-compliance with our code identified during the assessment and promote opportunities for improved performance.

Through the RPP, we systematically screen new supplier contracts with a value greater than EUR 400,000 and new joint venture partners on a continuous basis as well as existing suppliers that make up our top 80 percent spend annually.

The governance responsibility for RPP lies with the RPP steering committee which oversees RPP programme development, performance and priorities. The RPP steering committee reports directly to the Compliance Committee.

### *2.3. Risk due diligence of suppliers and supply chains*

We understand that Modern Slavery is a risk to any business supply chain. Through assessment of our overall operational risks, we believe that our principle modern slavery risks are in our supply chains and we have therefore established procedures to mitigating risks within our supply chain.

Since 2018, we have increased our specific focus on Modern Slavery in our supply chains. In 2016, conducted an analysis of our sourcing countries and product areas to identify where our biggest risks are located. This enabled us to focus on suppliers where our actions can have the most impact to mitigate modern slavery.

Though the vast majority of Ørsted suppliers are located in countries with low risk of forced labour, our analysis highlighted risks of modern slavery in service industries, particularly maritime services and construction. We also identified sourcing countries with a high influx of foreign migrants as a potential risk of poor recruitment practices, debt bondage, workers on vessels and working conditions for foreign workers.

In 2017, we continued to follow-up on the findings from the 2016 supply chain risks analysis. Through a risk-based analysis, we identified two priority areas which present some of the potential risks of modern slavery in our current and direct supply chain.

The first area was to continue our investigation of modern slavery risks in our maritime services. Four different kinds of maritime suppliers were selected to be assessed with focus on labour rights for offshore workers and compliance with the international Maritime Labour Convention. Two suppliers were assessed in 2017 and another two have been identified to be assessed in the first half of 2018. The first assessments demonstrated that the suppliers had adequate policies, procedures and management systems to be compliant with the Maritime Labour Convention.

The second area reviewed a supplier located in Vietnam. In August, the RPP team visited the cable supplier and assessed if the supplier met our expectations set out in our Code of Conduct and conducted interviews with employees. The assessment focused on a wide range of labour and human rights issues such as their recruitment process, general working conditions, remuneration, working hours and wages. While the assessment revealed that the overall working environment and hiring procedures were in alignment with international good practice, the assessment found that internal and external grievance mechanism could be improved and that working conditions in one minor area of the production site should be improved. The RPP team provided recommendations and guidance for addressing these and other minor issues which the supplier accepted and began implementing in October 2017.

In Ørsted, we understand that Modern Slavery is not static and we will continue our proactive approach to identify and mitigate modern slavery risk in the years ahead. Our business is rapidly developing in new regions with higher risks, and in November 2017, the RPP began an initial dialogue with potential suppliers in Taiwan to review potential risk of modern slavery in the region and develop awareness of Modern Slavery risks.

This statement was approved by the Board of  
Directors of Westermost Rough Limited

Signed on behalf of the Board

  
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Phillip H. De Villiers

Director, Westermost Rough Limited

Date: 25 June 2018