

VATTENFALL

The Guide to the Code of Conduct for Suppliers and Partners 2026

1. Introduction

1.1. The Code

The Vattenfall Code of Conduct for Suppliers and Partners (also referred to as the "Code" or the "CoCfSP") sets out the minimum requirements that are expected of Vattenfall's suppliers and partners. It is based on, amongst others, the UN Global Compact, the UN Guiding Principles, and the OECD Guidelines, and is guided by the UN Sustainable Development Goals.

The Code reflects Vattenfall's commitment to ensuring responsible business practices throughout our value chain. This means promoting sustainability both in and beyond our corporate boundaries. Our suppliers' and partners' business operations are also expected to be environmentally, socially, and ethically responsible. Together with our suppliers and partners, we aim to contribute to a positive change in society and in parallel gain long-term competitive advantages.

1.2. The Guide

This Guide to the Vattenfall CoCfSP (also referred to as the "Guide") 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, covering issues related to governance, human rights, the environment and business ethics.

The Guide is structured in the same manner as the Code with sections corresponding to the provisions of the Code. Each section of the Guide includes relevant references to the text of the Code, and outlines both what is required and what is expected of our suppliers and partners. This is further supplemented with practical guidance, relevant links to useful resources, useful and supplementary information, and good practice examples which can be directly applied to business operations and adapted to fit various business contexts and circumstances[1].

[1] Note: these practices are only examples of how to fulfil Vattenfall's requirements and expectations, alternative practices and activities are of course welcome.

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2. Implementation of the Code of Conduct for Suppliers and Partners

2.1 General

We prioritize living our values and maintaining integrity, which in turn makes us a trustworthy company. As such, Vattenfall works to ensure that all its business operations comply with national and international laws and regulations. Under the Code of Conduct for Suppliers and Partners ('Code'), a "supplier" or "partner" refers to a legal entity or individual that is currently or will soon be engaged in business activities with Vattenfall. This includes joint venture and consortium partners, among others. When engaging in business with Vattenfall, suppliers and partners are required to adhere to the Code or an equivalent standard that has been mutually agreed upon with Vattenfall.

Vattenfall requires its suppliers and partners to:

- Comply with the Code or an equivalent standard, agreed together with Vattenfall, when doing business with Vattenfall.

Examples of good practice

- Develop and maintain a Code with equivalent standards and expectations as the Vattenfall Code.
- Ensure there is an individual or group responsible for the implementation of the Code or equivalent standard.
- Communicate the expectations to the relevant departments, such as procurement, sourcing, supplier management, etc. to ensure (sub-) suppliers adhere to the same level of requirements.

2.2 Compliance with laws and regulations

Vattenfall ensures that all its business operations comply with the laws, regulations, and standards in the countries and regions where it operates. The company has established an integrity organization that helps identify, mitigate, and monitor the risk of non-compliance with laws, regulations, and rules in the countries in which Vattenfall operates, as well as with the international standards and codes of conduct that are relevant to Vattenfall's business activities.

Vattenfall requires its suppliers and partners to:

- Comply with applicable laws, rules and regulations in the countries where they operate.

Vattenfall expects its suppliers and partners to:

- In case of contradictions or discrepancies between the Code and applicable laws, rules and regulations, suppliers and partners should meet the most stringent requirements.
- Inform Vattenfall if there are discrepancies between the Code and applicable laws, rules and regulations.

Examples of good practice:

- Continuously review current and future local laws, rules and regulations to understand the impacts on business operations.
- Establish routines, including roles and responsibilities, for reviewing and responding to current and future laws, rules and regulations.
- Conduct a mapping and comparative study between the Code and local laws and legislation to understand which are more stringent.
- Subscribe to legal databases and newsletters to remain up-to-date with local legislation.
- Create legal management systems to keep track of local legislation applicable to operations of the business.

2.3 Commitment to continuous improvement

At Vattenfall, we are always looking for ways to improve our current way of doing business, including our products, services, and processes. This approach is true across the company, from our work with human rights to integrity processes and incident reporting systems. Vattenfall recognizes that suppliers and partners will be at different stages of maturity, and we are committed to working together to achieve continuous improvement. If it is found that a supplier or partner is not meeting the requirements that have been set out in the Code, Vattenfall may offer guidance and specify which issues need to be corrected or approved.

Vattenfall expects its suppliers and partners to:

- Take corrective actions and commit to showing progress if Vattenfall finds that they are not meeting the requirements and expectations set out in this Code.

Vattenfall encourages its suppliers and partners to:

- Participate in initiatives aiming to raise the standard of an entire sector or across sectors, where applicable.

Examples of good practice:

- Conduct internal trainings with the relevant departments (i.e. Procurement department) to increase knowledge and raise awareness of the requirements and expectations set out in the Code.
- Benchmark your processes and ways of doing business with similar companies and industries, with the aim of understanding best practice activities.
- Conduct periodic internal mapping exercises to understand where the business has weak areas, and create action plans based on those areas. These action plans can result in additional training sessions for instance.
- Actively participate in industry initiatives to continuously improve internal sustainability standards, share best practices, and promote collective action to address challenges.

Relevant links:

- The Role of Sustainability Initiatives in Mandatory Due Diligence (OECD)

2.4. Consequences in case of violations

Vattenfall will seek appropriate remedial measures to prevent, stop, or minimize the extent of a violation. A major failure, persistent failure to comply with the Code, or repeated and unjustified refusal to provide the required information can result in the suspension or termination of the suppliers' and partners' activities with Vattenfall.

Vattenfall requires its suppliers and partners to:

- Address any violations of the Code or agreed equivalent standards that come to their knowledge and take appropriate actions.

Examples of good practice

- Have clear policies and processes in place for remediation and mitigation of any violations for each area of the Vattenfall Code.

Supplementary information:

In case a violation is identified Vattenfall may take the following steps:

1. Engage with the supplier to establish appropriate actions and time frame for remediation. As long as the violation continues the supplier should be able to demonstrate its own ongoing efforts to mitigate the impact;
2. In case the supplier fails to take action, or neglects to demonstrate efforts of improvement, in accordance with the agreed upon time frame, or in case of reoccurring violations, Vattenfall may temporarily cease activities with the supplier until appropriate remedial action is taken;
3. As a last resort, if the supplier fails to resolve the violation even after temporarily stopping activities with Vattenfall, Vattenfall will terminate its business relationship with the supplier.



2.5. Sustainability due diligence and transparency

Vattenfall conducts due diligence by regularly and systematically identifying and assessing human and labour rights, environment and business ethics related risks and impacts in its value chain, and uses this information to avoid, mitigate or remediate the impacts to ensure that it operates responsibly and sustainably. Due diligence should be an integral part of companies' decision-making and risk-management processes, which includes our suppliers and partners.

Vattenfall requires its suppliers and partners to:

- Conduct adequate sustainability risk-based due diligence in their own operations and supply chain that is proportional to their size, impact, resource availability, business activities and leverage.
- Identify and assess risks and impacts related to human and labour rights, environment and business ethics.
- Implement appropriate prevention, mitigation and remediation measures.
- Allow Vattenfall, and/or a third party authorised by Vattenfall and reasonably acceptable to the supplier and partner, to conduct audits and assessments, including traceability assessments, of the supplier's and partner's operations relevant to the business activities with Vattenfall; including but not limited to the supplier's and partner's facilities.
- At the supplier's and partner's request, the parties involved in any such audit or assessment shall enter into a confidentiality agreement regarding the circumstances disclosed in the audit or assessment.

Vattenfall expects its suppliers and partners to:

- Transparently disclose information related to their due diligence processes and key findings in a timely and accurate manner to Vattenfall upon request.

Examples of good practice

Due diligence should be an integral part of a supplier's or partner's decision-making, as well as be responsive and adaptive to changing risk pictures and conducted on an ongoing basis.

- Ensure the due diligence is appropriate to the supplier's circumstances, including the context of its operations, business model, position in supply chain, and nature of its products/services.
- Develop and implement an internal due diligence process in line with for example the "OECD Due Diligence Guidance for Responsible Business Conduct".
- Collaborate on an industry/multi-stakeholder level, to identify, assess and address risks related to your own operations and supply chain.

Supplementary information

Information requests made by Vattenfall will be risk-based, taking into account the severity and likelihood of the risks and impacts connected to suppliers' and partners' activities. They will also be proportionate to suppliers' and partners' size, resource availability, business activities and leverage.

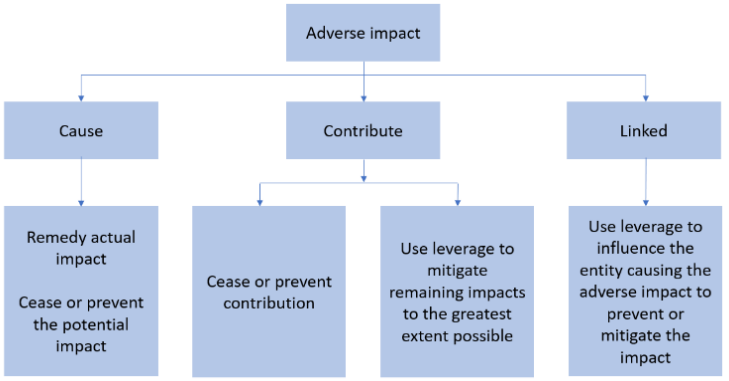
The below framework can be used for carrying out due diligence. If you are a small or medium-sized enterprise (SME), adapt your due diligence actions according to your company size, impact, resource availability, business activities and leverage.



OECD Steps		Examples of supporting measures (please consult the OECD Due Diligence Guidance for Responsible Business Conduct for additional measures, examples, and explanations)
Step 1	Embed responsible business conduct into policies and management systems	a. Review and update existing policies on responsible business conduct. b. Assign oversight and responsibility for due diligence to relevant senior management.
Step 2	Identify and assess actual and potential adverse impacts associated with the company's operations, products or services	a. Carry out in-depth assessment on areas in the company where adverse impacts are most likely to be present and most significant. b. Assess whether the company caused, contributed, or has operations linked to the identified adverse impacts. c. Prioritise the most significant risks and impacts for action, based on severity and likelihood.
Step 3	Cease, prevent and mitigate adverse impacts	a. Stop activities that are causing or contributing to actual adverse impacts, and if complex to cease them immediately, develop actions plans for how to do so. b. Consult with the impacted stakeholders and their representatives to formulate appropriate actions and plans. c. Assign responsibility for developing, implementing and monitoring actions and plans.
Step 4	Track implementation and results	a. Carry out screenings and periodic audits of the outcomes achieved, and periodically assess business relationships, to verify that risk mitigation measures are being pursued. b. Set effective KPIs within business areas to measure success of management systems. c. Engage with suppliers, working on industry initiatives. d. Maintain dialogues with external stakeholders regarding effectiveness of preventive measures in the business operations. e. Conduct assessments on supplier base to track adherence to compliance measures.
Step 5	Communicate, internally and externally, how impacts are addressed	a. Report relevant information on due diligence conducted to identify and address adverse impacts.
Step 6	Provide for or cooperate in remediation when appropriate	a. Seek to restore the affected person(s) to the situation they would be in had the adverse impact not occurred. b. Enable remediation proportionate to the significance and scale of the adverse impact.

- **Risk** – Whilst many companies interpret risk as something impacting the company itself (i.e.. financial, market, operations, reputational risks), in the context of due diligence risk refers to the likelihood of adverse impacts on people, the environment and society that a company causes, contributes to, or is directly linked to.
    - **Cause**: A company causes an adverse impact if the company's activities on their own are sufficient to result in the adverse impact.
    - **Contribute**: A company contributes to an adverse impact if its activities, in combination with the activities of other entities, cause the impact, or if the activities of the company cause, facilitate or incentivise another entity to cause an adverse impact. Contribution must be substantial, meaning that it does not include minor or trivial contributions.
    - **Directly linked:** Linkage is defined by the relationship between the adverse impact and the company's products, services or operations through another entity.

- The relationship to an adverse impact is important when determining how to respond to the impact, including whether
- there is a responsibility to provide or cooperate in remediation. The significance of the adverse impact also determines the priority a company gives to an issue, and is a function of its likelihood and severity. Severity of impacts is judged by their scale, scope, and irremediable character.
    - **Scale -** gravity of adverse impact.
    - **Scope -** concerns the reach of the impact.
    - **Irremediable character -** limits on the ability to restore the individual or environment affected to a situation equivalent to their situation before the adverse impact.



Source: OECD Due Diligence Guidance for Responsible Business Conduct

For more information regarding Vattenfall's due diligence and compliance process, please see Vattenfall's Annual and Sustainability Report.

Relevant links:

- German Act on Corporate Due Diligence in Supply Chains
- Corporate Sustainability Due Diligence Directive
- OECD Due Diligence Guidance for Responsible Business Conduct

2.6 Management systems and monitoring

Monitoring performance is an essential part of reaching Vattenfall's goals and objectives. We have management systems and controls in place to support this, which are applied across all markets in which we have business activities. Management systems and monitoring performance also extends beyond a due diligence management system, to a range of other areas including but not limited to management systems for the environment, health and safety and human rights. Management systems that incorporate a risk-based approach in turn support effective due diligence inside and outside of the company's activities.

Vattenfall requires its suppliers and partners to:

- Have adequate management systems, controls or equivalent in place that are proportional to their size, impact, resource availability, and business activities to ensure compliance with the Code or agreed equivalent standards.

Vattenfall expects its suppliers and partners to:

- Secure and monitor that their own suppliers and sub-suppliers comply with the Code or, where applicable, their own equivalent code of conduct.

Examples of good practice

- Establish effective management systems, such as policies, processes and procedures, that are aimed at ensuring compliance with the Vattenfall Code or equivalent.
- Establish effective management systems that include relevant policies and procedures aimed at assessing risks of non-conformities, integrating and acting upon findings, monitoring progress and communicating the process and results.
- See also 3.11. and 4.3 for additional examples of good practice.

Supplementary information

A management system is a set of policies, processes, and procedures used by a company to achieve its objectives. It provides a structured framework for managing and improving an organization's activities in a specific area, such as quality, environment, health and safety, or security.

A management system must be Documented, Communicated, Implemented, Monitored and Improved.

- **Documented:** The policies, processes, and procedures are documented clearly and easily accessible to all relevant stakeholders.
- **Communicated:** All stakeholders involved in the system are aware of their roles and responsibilities within it.
- **Implemented:** The system is actively used in day-to-day operations.
- **Monitored and improved**: The system is regularly reviewed and updated to ensure its effectiveness.

Relevant links:

- OECD Due Diligence Guidance for Responsible Business Conduct



3. Human rights and labour rights

3.1 General

Vattenfall acknowledges that it has a responsibility to respect all internationally recognised human rights, and that the company is in a position to make a positive impact on human rights issues. At Vattenfall, we have the responsibility to identify, prevent, mitigate, and remedy potential and actual negative impacts on human rights, and thus have appropriate processes in place that cover both our own operations and our whole value chain. Part of our responsibility is therefore to ensure that those with whom we do business, which includes our suppliers and partners, have at least the same level of commitment to respecting human rights as we do.

Vattenfall requires its suppliers and partners to:

- Respect all internationally recognised human rights, as set out in the International Bill of Human Rights.
- Apply the Code to all the suppliers' and partners' workers. All requirements and expectations included in this Code shall be applied equally to all types of workers.
- Take measures to avoid causing, contributing or being linked to negative human rights impacts. This includes all types of rightsholders, such as workers, affected communities, and human rights defenders.

Examples of good practice:

- Develop and implement policies concerning human rights topics and processes that are appropriate to the company's circumstances, including size, operational context, and position in the supply chain.
- Conduct internal trainings with your employees to raise awareness regarding human rights.
- Engage with suppliers though dialogues, knowledge sharing sessions, and onboarding processes.

Supplementary information:

The International Bill of Human Rights consists of the Universal Declaration of Human Rights, the International Covenant on Economic, Social, and Cultural Rights, and the International Covenant on Civil and Political Rights, as well as two Optional Protocols. For more information, please refer to the following website: UN International Bill of Human Rights

All types of workers includes temporary, migrant, student, and contract workers, as well as direct employees. It also includes the following:

- **Dispatched workers:** According to the International Labor Organization (ILO), "labour dispatch" refers to the practice of hiring employees through an employment service agency, as opposed to the traditional legal labour relationship (direct employment).
- **Temporary staff:** According to ILO, temporary employment, whereby workers are engaged only for a specific period of time, includes fixed-term, project- or task-based contracts, as well as seasonal or casual work, including day labour. Temporary staff is employed directly by the employer.
- **Contracted workers:** According to ILO, contract labour is understood as covering all situations in which work is performed for a person who is not the worker's employer under labour law as it now stands, but in conditions of subordination or dependency that are close to an employment relationship under that law.
- **Rightsholders:** Refers to groups or individuals whose individual human rights or collective rights are or may be affected by business activities, products, or services. Rightsholders includes but is not limited to workers, workers' representatives, trade unions, affected communities, and human rights defenders

Vattenfall documents:

- Please read more in Vattenfall's Human Rights Policy.
- For more information regarding Vattenfall's progress on human rights, please refer to Vattenfall's Human Rights Progress Report.



3.2 Indigenous and Tribal Peoples

Indigenous and Tribal Peoples hold specific rights according to international human rights law, including the right to self-determination and to participate in matters which would affect their rights. Vattenfall recognizes that its activities have an impact on indigenous peoples located in the areas in which it operates, including Sápmi, which is an area where the Sámi people live and work. To minimize the risk of negative impact on Indigenous and Tribal Peoples, we have clearly defined stakeholder engagement processes, as well as best practice guidelines to respect Indigenous Peoples' rights, which all employees are expected to follow.

Vattenfall requires its suppliers and partners to:

- Respect the rights of Indigenous and Tribal Peoples and their social, cultural, environmental, and economic interests, including their connection with lands and other natural resources.
- Not be involved in illegal eviction or forced displacement.

Vattenfall encourages its suppliers and partners to:

- Respect the principle of free, prior and informed consent.
- Obtain broad support and agreement of Indigenous and Tribal Peoples in their activities.

Examples of good practice:

- Identify whether there are Indigenous Peoples that may be affected by your operations and new projects, and analyse what the strategic environment in the applicable country is regarding the recognition and respect for indigenous peoples' rights. This should form the basis for identifying potential areas of concern.
- Undertake an impact assessment that evaluates the potential and actual social, cultural, environmental, and economic impacts on Indigenous Peoples. This assessment should be conducted in cooperation with the affected Indigenous Peoples.
- Implement clearly defined stakeholder engagement processes to ensure the thoughts, concerns and aspirations of Indigenous Peoples are considered in decision making.
- Involve representatives of Indigenous Peoples in frequent meetings and dialogue regarding projects and other business activities where Indigenous peoples live and work.
- Perform trainings to employees working with or in areas inhabited by Indigenous Peoples about the rights of Indigenous Peoples.

Supplementary information:

- **Free, prior and informed consent (FPIC)** is a principle in international human rights law, grounded in the rights to self-determination and non-discrimination. FPIC can be seen as a tool for ensuring Indigenous Peoples' self-determination and meaningful participation in decisions that affect them. Following this principle, Indigenous communities have the right to determine their own priorities and strategies for the development and use of their lands, territories, and resources. Through FPIC, Indigenous communities can give or withhold consent to projects that may affect them, ensuring that their rights, priorities, and economic, social, and cultural development are respected.
- **Indigenous peoples:** Self-identification as belonging to an indigenous people. Descent from populations, who inhabited the country or geographical region at the time of conquest, colonisation or establishment of present state boundaries. They retain some or all of their own social, economic, cultural and political institutions, irrespective of their legal status.
- **Tribal peoples:** Self-identification as belonging to a tribal people. Their social, cultural and economic conditions distinguish them from other sections of the national community. Their status is regulated wholly or partially by their own customs or traditions or by special laws or regulations.

Vattenfall documents:
Please read more Vattenfall's responsibility towards Indigenous people: Approach towards indigenous people in Sweden

Relevant links:

- UN Declaration on the Rights of Indigenous Peoples
- ILO Convention No. 169, Indigenous and Tribal Peoples Convention
- The Danish Institute for Human Rights, Respecting the Rights of Indigenous peoples: A Due Diligence Checklist for Companies
- UN Consultation and free, prior and informed consent (FPIC)
- Who are the indigenous and tribal peoples? | International Labour Organization



3.3 Community engagement and development

Due to the nature of Vattenfall's operations, our activities have the potential to impact the communities in which we operate. Each business area is aware of this risk and carries out local consultation processes with affected communities to understand their priorities and concerns before a project is initiated. This means that landowners, representatives of the local community and the immediate environment, and the neighbours are consulted through various process consultations and informed by establishing transparent and clear communication channels according to the needs of the local stakeholders. Community engagement and consultation is therefore a crucial step in any company's operations and due diligence processes. It is through engagement with local stakeholders that a company is able to increase its understanding of a local context, and in turn understand the actual and potential adverse human right impacts associated with the company's operations in that area.

Vattenfall requires its suppliers and partners to:

- Respect the rights, interests, and development aspirations of affected communities and vulnerable groups during normal operations, as well as during significant changes in their operations.
- Engage in transparent, open, and honest dialogue and collaborate with stakeholders and authorities in and around the area in which they operate, engaging with human rights and environmental defenders when relevant.

Vattenfall expects its suppliers and partners to:

- Carry out community engagement in an inclusive, equitable, culturally appropriate, gender-sensitive, and rights-compatible manner.

Examples of good practice:

- **Consult potentially affected stakeholders** at appropriate intervals, with an aim of doing so as early and transparently as possible. This can, for instance, occur when entering into a new activity or relationship, prior to making major decisions or changes to business operations, or in response to or in anticipation of changes in the operation environment.
- **Develop a community engagement plan** where the following steps can be included:
    - Identify who needs to be engaged and through which channels to engage with them. Ensure all relevant groups are represented, whilst considering local challenges and barriers to representation;
    - Understand the main challenges and benefits that a certain project or activity may have on a community;
    - Identify the local issues that you will need to take into consideration when planning the project or activity.
- **Conduct community engagement** in the area's local languages, ensuring that all potentially affected community members are able to understand the potential impacts on them and raise their concerns where needed. Different communication methods may be required depending on the local context and groups of people (ie. surveys, telephone polls, door knocking, webinars, social media).
- **Collect continuous feedback from community members** and understand if future engagement should be adapted and if so, in what way. Continue the engagement process throughout a project's (or activity's) operational lifetime.
- In case engagement with potentially affected stakeholders is not possible, suppliers can instead consult credible alternatives (Ie. human rights defenders and civil society organisations).

Supplementary information:

- Good practice examples from:
  - The UK Department for Business, Energy & Industrial Strategy
  - Wind Europe: Wind Industry Commitments on community engagement



3.4 Child labour and young workers

Child labour, or any kind of activity or work which is harmful to the intellectual, physical, social and moral development of persons under 18 and undermines their education by preventing them from going to school, constraining them to abandon schooling too soon or requiring them to work and study at the same time, is explicitly prohibited in all our operations. Vattenfall adheres to the ILO's Minimum Age Convention, which concerns the minimum age of admission to employment. It includes for instance hazardous work, basic minimum age, and light work.

Vattenfall requires its suppliers and partners to:

- Work against all forms of child labour, and not participate in, or benefit from, any form of child labour.
- Not employ children below the minimum age of employment or the age for completing compulsory education in that country, whichever is higher.
- Not employ any workers under the age of 18 to perform any work that is defined in national law as hazardous.
- Put in place a remediation programme if child labour is detected.

Examples of good practice

- Ensure that young workers do not work excessive overtime hours, night shifts, or receive remuneration below what adult workers earn for the same work.
- Create a plan that can be implemented in case child labour is found, with clear and defined roles, responsibilities, timelines, and resources.
- Train management and relevant employees on child labour requirements, indicators and prevention methods.
- Consider investing in local community efforts that aim to support children in their education.

Supplementary information:

- The minimum age for employment or work is determined by ILO Convention n. 138. It states that the minimum age should not be less than the age of completion of compulsory schooling, and not less than 15 years in any case.
- Suppliers are prohibited from hiring workers under the age of 18 for hazardous work as defined by national law (e.g. such as those concerning dangerous substances, agents or processes).
- Young workers must receive appropriate training and supervision, especially when assigned new tasks.
- Young workers under 18 are not allowed to work at night, except for specific industrial undertakings that require continuous day and night work.
- Young workers employed in night work should be given a rest period of at least 13 consecutive hours between two working periods.

Relevant links:

- Children's Rights and Business Principles
- ILO Worst Forms of Child Labour Convention (C.182-1999)
- OSH Wiki – Young workers

A remediation program can be developed using the ILO-IOE Child Labour Guidance Tool for Business

3.5 Use of security personnel

It is important for Vattenfall that its employed or contracted security personnel, either public or private security forces, respect human rights and act in accordance with international standards of conduct.

Vattenfall requires its suppliers and partners to:

- Ensure that all security personnel, including contracted security personnel, respect the human rights and dignity of all people and, in case of a threat, use reasonable force proportional to the threat.

Examples of good practice

- Conduct ongoing risk assessments of the security situation in the operating environment, including:
    - Identification of security risks and the potential for violence;
    - The criminal records of the security forces;
    - The rule of law and the local judiciary's capacity to hold human rights abusers accountable;
    - A conflict analysis to understand the root causes and nature of local conflicts.
- Engage appropriately with public and private security service providers and surrounding communities in complex environments
- Conduct background checks or human rights screenings on security forces in order to take appropriate measures to avoid individuals who are credibly implicated in human rights abuses.
- Implement a system where allegations of human rights abuses can be reported and investigated.



Relevant links:

- Voluntary Principles on Security and Human Rights

3.6 Modern slavery and forced labour

All forms of modern slavery are unacceptable to Vattenfall. This includes but is not limited to bonded labour, involuntary prison labour, slavery, human trafficking, servitude or work performed under the menace of a penalty or coercion. Due to the severity of the potential impacts of modern slavery, actions to mitigate such risks are of utmost priority for suppliers operating in or sourcing from high-risk areas.

Vattenfall requires its suppliers and partners to:

- Not participate in, or benefit from any form of forced labour, including bonded labour, involuntary prison labour, slavery, human trafficking, servitude or work performed under the menace of a penalty or coercion.
- Ensure all of their workers have the right to enter into and terminate their employment freely, as well as conduct work on a voluntary basis.
- Not retain worker's identity documents.
- Not take actions that would unduly limit workers freedom of movement, whether within the suppliers' and partners' premises (including dormitories) or beyond.
- Not require its workers to pay a fee or deposit as a condition of employment.

Examples of good practice

- Develop and implement policies in relation to modern slavery and forced labour.
- Develop and integrate a due diligence process that is specifically aimed at identifying, assessing, and managing risks related to modern slavery in your operations and supply chains. This should include the actions to be taken if such risks are identified.
- Train employees and workers on what modern slavery and human trafficking is, and what their indicators are.
- Have effective grievance mechanisms in place for potential victims of modern slavery. These should be accessible and anonymous.
- Do not confiscate or deny workers access to their identification documents, including but not limited to immigration documents, passports, work permits, or similar.

Supplementary information

The ILO has developed a set of indicators that support those who work with forced labour topics to identify persons who may be trapped in a (state imposed) forced labour situation. These include abuse of vulnerability, deception, restriction of movement, isolation, physical and sexual violence, intimidation and threats, retention of identity documents, withholding of wages, debt bondage, abusive working and living conditions, and excessive overtime.

Please see the following link for more information: ILO Indicators of Forced Labour

Vattenfall documents:

Please read more about forced labour in Vattenfall's statement on slavery and trafficking here.

Relevant links:

- International Bill of Human Rights (Consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights)
- ILO Forced Labour Convention, 1930 (No. 29)
- ILO Abolition of Forced Labour Convention, 1957 (No. 105)

3.7 Conflict-affected and other high-risk areas

Conflict-affected and high-risk areas are identified by the presence of armed conflict, widespread violence or other risks of harm to people. Operating in and sourcing from conflict-affected and high-risk areas means that there are significant risks of being complicit in severe human rights abuses, as well as violations of national and international law. Whilst Vattenfall's operations are not located in conflict-affected or high-risk areas, there is a potential risk that sourcing from such an area can happen in our supply chain.

Vattenfall requires its suppliers and partners to:

- Assess whether their own operations, or supply chains, are located in conflict-affected or other high-risk areas.
- If located in conflict-affected or other high risk-areas, adopt enhanced due diligence measures suited to the specific context.
- Ensure that the sourcing of goods and services does not generate revenues that fund or support armed actors.

Vattenfall expects its suppliers and partners to:

- Not interfere with the lawful actions of human rights and environmental defenders or in their rights to freedom of expression, association or peaceful assembly.
- Not engage in any activities that seek to undermine civil society and civic freedoms.

Examples of good practice

- Adopt and conduct enhanced due diligence measures, building on a regular human rights due diligence process and taking a conflict-sensitive approach. This can for instance include the following:
    - Develop a procedure and take measures to understand the context in which your company is operating, whether this is considered a conflict-affected or high-risk area. This can be done through an analysis of actual and/or potential conflicts, countries of origin, material transit routes and supplier data
    - Conduct an analysis of how your business operations interact with the surrounding context.
    - Define, design, and implement mitigation measures that are used to address the actual and/or potential adverse impacts, which for instance can include a risk management plan. Monitor and track the performance of the mitigation measures, and adapt accordingly.
    - If the opportunity emerges to strengthen social cohesion and peace the area in which you operate, capitalise on this.
- Analyse the risk of your business operations being complicit in war crimes in your due diligence process, if you are located in or sourcing from conflict-affected and high-risk areas.

Supplementary information

- **Human rights and environmental defenders:** refers to the people who, individually or with others, act to promote, protect, or strive for the protection and realisation of human rights, environmental rights, and fundamental freedoms. They may be community leaders, Indigenous Peoples, trade union representatives, lawyers, journalists or people working for non-governmental organisations (NGOs) or intergovernmental organisations. This definition does not include those individuals or groups who commit or propagate violence.

Relevant links

- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas | OECD
- Conflict Affected and High-Risk Areas (CAHRAs) (responsiblemineralsinitiative.org)

3.8 High risk minerals

For Vattenfall, high risk minerals include conflict minerals, critical minerals for the energy transition, rare earth elements, and platinum group metals.

Vattenfall requires its suppliers and partners to:

- Take appropriate steps to identify the use of high-risk minerals in their supply chain.
- Establish traceability or chain of custody to its source or processing location.
- Take appropriate steps to ensure that risks are identified, and appropriate prevention, mitigation and remedial measures are implemented throughout the supply chain.

Vattenfall expects its suppliers and partners to:

- Share relevant information on the origin of high-risk minerals and any relevant assessments upon request.

Vattenfall encourages its suppliers and partners to:

- Replace or reduce the use of high-risk minerals in their supply chains where possible

Examples of good practice

- Identify in what processes high-risk minerals are used.
- Map your full high-risk mineral supply chain to gain increased insights into where your minerals originate from.
- Take steps to reduce the use of high-risk minerals through conscious technology choices or optimised product design.
- Reuse and recycle high-risk minerals.
- Use certified high-risk minerals when it is known that minerals are sourced from or produced in countries or conditions with adverse environmental and human rights impacts.
- Promote circular economy of high-risk minerals by sourcing recycled minerals and by facilitating the re-entry of used materials into the market.

Supplementary information

- **Conflict minerals**: Minerals mined in areas affected by armed conflict and human rights abuses.
- **Rare earth elements (REE):** Minerals that are difficult to extract and are mainly used in energy-efficient and sustainable energy technologies.
- **Critical minerals for the energy transition**: Refers to aluminium, chromium, cobalt, copper, graphite, indium, iron, lead, lithium, manganese, molybdenum, nickel, phosphorus, silver, titanium, vanadium, and zinc.
- **Platinum group metals (PGMs)**: A family of six elements that are valued for their wide range of industrial, medical, and electronic applications.

Relevant links

- Earthworks - Responsible Minerals Sourcing for Renewable Energy
- World Bank Group - Minerals for Climate Action: The Mineral Intensity of the Clean Energy Transition
- European Commission – Critical Raw Material Act
- International Energy Agency – The Role of Critical Minerals in Clean Energy Transitions
- IRENA - Critical Materials For The Energy Transition
- International Energy Agency - Mineral requirements for clean energy transitions
- European Union - Laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas

3.9 Hours of work

Having normal or standard working hours in place is important for workers' mental and physical health. If workers are working overtime or irregular hours on a regular basis, their health may be negatively affected both in the long- and short-term. Therefore, having limits in place regarding the number of hours worked is important. Those who continuously work long working hours also pose risks to workplace safety, which in turn may negatively affect workers across a company. Vattenfall follows international and national standards when it comes to working hours, both regarding normal and overtime hours.

Vattenfall requires its suppliers and partners to:

- Ensure that normal working hours and overtime working hours for all workers are within the limits permitted by applicable laws and regulations or agreed to in relevant collective agreements and shall not cause any physical or mental harm.
- Not punish or retaliate against workers, without distinction, who are unable or refuse to do overtime, including through dismissal threats, wage reductions, and abuse.

Examples of good practice:

- Ensure working hours, including overtime, night work and breaks, comply with national laws and collective agreements. Ensure that the total working hours, including overtime, do not exceed the limits set out in ILO standards.
- Ensure all overtime work is voluntary. If overtime is required, the employer should communicate that workers are free to refuse and that there are no negative repercussions (i.e. threats, intimidation, loss of opportunity for other overtime work) if they choose to do so. An overtime scheduling and approval process can be created.
- Ensure all employees are entitled to minimum 24 hours of consecutive rest in every seven-day period, as well as holiday and leave in accordance with applicable legislation and local traditions.
- Ensure all employees have a signed employment contract before employment begins. It must contain the employer's name, employee name, personal ID number/date of birth, position, salary, working hours, overtime compensation, benefits and notice period.
- Keep a record of employee working hours, including a separation of normal and overtime working hours. This can be used to monitor working hour processes and understand if any adjustments need to be made (i.e. regular overtime may imply that there is a shortage of workers, and that an increased number of hires must be made).
- Set reasonable production targets and schedules based on realistic labour availability. Avoid overbooking production lines, prevent production mistakes, and ensure complete understanding of client demands, alongside a strong set of policies and procedures to avoid requiring overtime.

Supplementary information:

- **Workers without distinction**: refers to the act of not differentiating between workers of different background when determining working hours.
- **Working hours:** refers to the number of hours a worker may be required to work per week by their employer.
- **Overtime:** refers to all hours worked in excess of regular working hours. Please refer to national legislation and international standards (i.e. ILO) regarding legal overtime hours.
- **Mental or physical harm:** This may include sleep disturbance and fatigue, cardiovascular and gastro-intestinal disorders, stress, anxiety, increased risk of accidents, and workplace injuries.

Relevant links

- ILO Guidelines
- Ethical Trade Initiative: Base Code Guidance: Working hours
- Overtime work: A review of literature and initial empirical analysis

3.10 Wages, leave and benefits

Remuneration, including wages and paid leave, for workers should always be fair, sustainable, and reflect local labour laws. It should also be in line with both market standards and collective labour agreements. Having both adequate wages in place and paying them in a timely manner are essential for securing decent work, and have a direct and tangible effect on the everyday lives of workers. Vattenfall's activities and ways of working aim to contribute to the Sustainable Development Goal that specifically concerns inequalities, and has committed to equal pay, as well as equal leadership and equal opportunities for women in the energy sector by 2030.

Vattenfall requires its suppliers and partners to:

- Pay a fair and equal wage to all workers, including benefits and leave, that meets basic needs in compliance with applicable laws or relevant collective agreements.
- Compensate workers for overtime at pay rates greater than regular hourly rates or with time off in lieu.

Vattenfall expects its suppliers and partners to:

- Identify, prevent, mitigate and remedy structural differences in pay and benefits for equal or comparable work regardless of personal identity, including gender.
- Ensure any work performed is on the basis of recognised employment relationships established through national laws and practice.

Vattenfall encourages its suppliers and partners to:

- Pay a living wage to their workers.

Examples of good practice:

- Pay wages directly to workers. In cases where the concerned worker has agreed to the contrary or as provided by national laws, regulations, or collective agreements, an exception may be made.
- Pay the statutory wage to workers on a regular basis, at least once a month. Workers should receive a wage slip when wages are paid, containing information about the regular hours worked, overtime, piece work pay, subsistence allowances, potential wage deductions, and the paid net wages. The pay slip should be in a language understood by the worker.
- Document information about wage payments and time worked for all workers.
- Identify whether there are pay and/or benefit inequalities between different workers performing the same job in the company. An action plan can be created to address the issue, and should detail how the differences are fixed, have a clear timeframe, and include realistic actions that will be taken. An Equal Pay Policy can also be developed to indicate your commitment to tackling inequalities in pay and benefits.
- Do not permit wage deductions to be used as a form of disciplinary measure. Any wage deductions made must be aligned with national laws and regulations.

Supplementary information:

- **Fair and equal wage**: All workers and employees have the right to receive a fair and equal wage for equal value. This includes, but is not limited to, for workers to identify as women, men, persons with disabilities, migrant workers, and young people.
- **Living wage**: The wage level that is necessary to afford a decent standard of living for workers and their families, taking into account the country circumstances and calculated for the work performed during the normal hours of work.
- **Recognised employment relationships**: This refers to the relationship between a worker (employee) and an employer, for whom the former performs work under specified conditions in exchange for remuneration. The employment relationship gives rise to reciprocal rights and obligations between the employer and the employee, and ensure access to employment-related rights and benefits.

Relevant links

- ILO: Setting Adequate Wage Program.
- ILO: Protection of Wages Convention, 1949 (No. 95).
- ILO: Promoting employment and decent work in a changing landscape
- Equality and Human Rights Commission: Equal Pay.
- Living wages | International Labour Organization



3.11 Health and safety

A healthy and safe workplace is everybody's responsibility. Compromising safety is never acceptable, and no employee should feel the pressure to forego safety in order to reach business targets. Vattenfall is committed to achieving the highest standards of health and safety at work, and we work with our suppliers to ensure they share the same high ambitions. This is part of the culture of care, in which we all play a vital part.

Vattenfall requires its suppliers and partners to:

- Ensure a safe and healthy working environment at all locations where work is performed, including at any housing facilities provided to their personnel.
- Ensure the working and living environment is free from physical abuse, punishment, threats of physical abuse, sexual or other harassment, verbal abuse, and any other form of intimidation.
- Ensure all work is preceded by and based on documented adequate risk management with implemented controls. This shall include physical, social and organisational health and safety risks.
- Provide workers with regular, recorded and relevant health and safety training, and provide such training to new or reassigned workers.
- Reduce risks according to the hierarchy of control principles: elimination, substitution, engineering controls, administrative controls, and as a last alternative, personal protective equipment.

Vattenfall expects its suppliers and partners to:

- Measure, monitor, document, and follow up on all serious health and safety incidents and hazards, in order to prevent reoccurrence.

Examples of good practice:

- Establish a Health & Safety Policy to ensure the health, safety and welfare of all employees, and outline who the competent person taking responsibility for health and safety at the workplace is.
- Implement a clear time out or stop work procedure. All workers have a responsibility and obligation to take a time out or to stop work when a threat of danger is perceived or when imminent danger to person(s) health or safety, equipment, or environment is present.
- Identify the type of workplace trainings required to ensure safety procedures are understood and followed on site. When workers are provided with Health & Safety training sessions, ensure every relevant employee takes part in them. The content of the training is described, and a register of employees that conducted the training is accessible.
- If accommodation is provided to workers, this is clean, safe, and meet the basic needs of workers.
- Provide workers with personal protective equipment that is readily available and free of charge. The correct safety equipment is always to be used.
- Provide workers with access to clean toilet facilities, potable water, and if appropriate, sanitary facilities for food storage at the work location. Appropriate rest facilities for workers to take workday breaks are provided.
- Ensure safety information and warning signs are easily visible in all risk areas and available in languages that the workers understand (i.e. local language).
- Convey clear instructions to all employees on how and when to report incidents and hazards.
    - In the event of an accident, a report shall be filed and an investigation shall be carried out to determine the root cause(s) and implement measures to prevent recurrence. The reporting, findings and learnings shall be shared with Vattenfall to promote continuous improvement.

- Monitor performance through periodic inspections aimed at identifying unsafe conditions and unsafe practices, for example poor housekeeping, unguarded equipment or blocked fire exits.

Supplementary information:

- **Hierarchy of Control Principles**: These principles are used to minimise and/or eliminate exposure to hazards. Companies should always strive for elimination, but where this is not possible, the second most effective measure should be applied.
    - Elimination: Physical removal of the hazard.
    - Substitution: Replace the hazard.
    - Engineering controls: Isolate people from the hazard.
    - Administrative controls: Change the way people work.
    - Person Protective Equipment (PPE): Protect the worker with PPE.
- **Personal Protective Equipment**: Based on the type of work being performed, this can include for example foot protection, safety helmets, hand protection, respiratory, hearing, face and eye protection, and high visibility clothing.
- **Appropriate rest facilities**: These are crucial for workday breaks and can include hygienic canteens and breakroom. They are especially important in workplaces where chemicals, dirt, noise, or other pollutants are present.

Vattenfall documents:

- Vattenfall's Health & Safety Policy



Relevant links

- ILO Occupational Safety and Health Convention, 1981 (No. 155)
- The Fundamental Conventions on Occupational Safety and Health
- ILO Welfare Facilities Recommendation, 1956 (No. 102)
- ISO 14001:2026 - Environmental management systems
- ISO 45003:2021 Occupational health and safety management — Psychological health and safety at work — Guidelines for managing psychosocial risks

3.12 Freedom of association and collective bargaining

At Vattenfall, every worker has the right to freedom of association and collective bargaining. It is part of our commitment to human rights and an essential part of ensuring that society is open and free. It is through the freedom of association and collective bargaining that our workers have the ability to, for instance, be represented by an organisation of their choice or by themselves, voice their concerns, and address their rights.

Vattenfall requires its suppliers and partners to:

- Recognise and respect the rights of all employees, without distinction, to freely associate, organise and bargain collectively, if the rightsholders so wish.

Vattenfall expects its suppliers and partners to:

- Allow for and not hinder alternative and independent forms of worker representation, in situations where the right to freedom of association and collective bargaining is restricted by applicable laws and regulations.

Examples of good practice

- Do not interfere with a worker's decision to associate or form their own independent form of representation.
- Encourage and support workers who engage in alternative and independent forms of worker representation if the rights to association and collective bargaining are restricted by law.
- Train management and workers on workers' rights and the role of unions.
- Raise awareness on the importance of freedom of association and collective bargaining, as well as the benefits to the employees.
- Do not interfere with the activities of workers' representatives while they carry out their functions.
- Implement policies and routines that respect the rights of employees to freely associate and bargain collectively.

Supplementary information:

An overview of information on important rights and international labour standards can be found here.

According to the United Nations Global Compact Business and Human Rights Navigator, businesses can be impacted by restrictions to freedom of association in their operations and supply chains in multiple ways:

- **Reputational and brand risk:** Failure to fulfil responsibilities regarding freedom of association may result in damage to the brand and company.
- **Financial risk:** Negative scrutiny can lead to loss of sales and reduced access to capital as investors and finance providers apply ESG criteria to their decision-making.
- **Legal risk:** Companies may face legal risks if found to obstruct union activity or workers' rights, particularly in countries where freedom of association is protected by law.
- **Operational risk:** Failure to provide legitimate channels for workers to express grievances can result in breakdowns in communication and disagreements, leading to high turnover and reduced productivity.

Relevant links:

- ILO Freedom of Association and Protection of the Right to Organise Convention (C. 87- 1948)
- Q&As on Business and freedom of association | International Labour Organization (ilo.org) Check "Legal barriers to respecting freedom of association" to learn more about how to take action.

3.13 Diversity, equity, inclusion and non-discrimination

As the energy market rapidly evolves and our goal of achieving fossil freedom becomes more ambitious, we require a broad range of perspectives to challenge us and contribute to the solution. At Vattenfall, we view equality, diversity, and inclusion as essential components of our success. These values are ingrained in our culture, reflected in our processes, and reinforced by our Codes of Conduct for employees, suppliers, and partners. Suppliers and partners must foster a diverse and inclusive workplace, free from discrimination of any kind. This includes ensuring equal opportunities across all aspects of employment, from hiring to retirement. Prohibited grounds for discrimination encompass a wide range of personal characteristics.

Vattenfall requires its suppliers and partners to:

- Promote diversity, equity, and inclusion, and not engage in any form of discrimination in recruitment, hiring, promotion, access to training, development, remuneration, and termination or retirement practices.
- Have routines for dealing with harassment, including physical, psychological, verbal, and sexual discrimination, and communicate that any form of harassment or abuse is unacceptable and must be reported.

Examples of good practice:

- Implement a clear statement or policy against discrimination and harassment.
- Conduct trainings and events to build awareness on equality, diversity, and inclusion, such as e-learnings and group workshops to sustain behavioural change.
- Evaluate and develop the company's recruitment and HR processes to ensure they are inclusive and promote diversity.
- Gather feedback from employees on a regular basis to identify areas for improvement and address concerns related to diversity and inclusion.
- Conduct benchmarking exercises against other companies, and measure progress.
- Support the formation of Employee Resource Groups (ERGs) to provide a safe space for employees from underrepresented groups to connect, network, and advocate for change.
- Maintain confidentiality throughout the investigation process to protect the privacy of all parties involved.

Supplementary information

Grounds for discrimination include but are not limited to gender, gender identity or expression, sexual orientation, race, colour, age, language, property, nationality or national origin, religion or belief, ethnic or social origin, caste, socio-economic background, marital status, health status, seen and unseen disability, pregnancy, family or marital status, belonging to an Indigenous and Tribal Peoples, trade union affiliation, political opinion, and any other personal identity.

- **Diversity:** Recognizing and valuing differences among people, including but not limited to race, ethnicity, gender, sexual orientation, age, disability, religion, and socioeconomic status
- **Equity:** Ensuring fair treatment and access to opportunities for all individuals, regardless of their background.
- **Inclusion:** Creating an environment where everyone feels welcomed, respected, and empowered to contribute fully.

Vattenfall documents:

- Please read more in Vattenfall's D&I Strategy

Relevant links:

- Global Diversity, Equity & Inclusion Benchmarks (GDEIB)
- Sustainable Development Goals

3.14 Grievance channels and remediation mechanisms

Negative impacts may occur despite a company's best efforts. It is therefore important that companies have systems in place that enable quick and effective responses to negative impacts, and that there are remediation processes that can provide remedy for harm done. To Vattenfall it is of great importance to protect the company, its employees, suppliers, customers, the environment and society as a whole against serious irregularities or harm that might be conducted by Vattenfall or Vattenfall's employees. If serious irregularities are found at an early stage, there is a better possibility of preventing risks and limiting the damage done. Vattenfall has therefore established a possibility to report serious irregularities through several different reporting lines.

Vattenfall expects suppliers and partners to:

- Make available appropriate grievance mechanisms to all personnel and interested parties, including affected communities, to make comments, recommendations, reports or complaints concerning the workplace, the environment, or the supplier's or partner's business practices.
- Have a remediation process in place through which reported human rights violations, as well as other topics outlined in the Code, can be appropriately remediated and followed up on.

Examples of good practice:

- When designing the company's grievance mechanism (operational-level grievance mechanisms), ensure it adheres to the UNGP's effectiveness criteria. This means ensuring it is legitimate, accessible, predictable, equitable, transparent, rights-compatible, based on dialogue and engagement, and a source of continuous learning.
- Provide one or more points of access to the grievance mechanism, including one independent point of access (ie. local NGO, hotline service, trade union).
- When making the grievance mechanisms available to personnel and interested parties, be proactive in raising awareness of its existence and ensure it is easy to use and engage with, available in different stakeholder groups' own language, and keeps those who lodge complaints safe.
- Map the landscape of grievance mechanisms that exist beyond the company's own operational-level grievance mechanisms. This will be helpful when understanding how to position the operational-level grievance mechanism to add value and avoid undermining other processes.
- Communicate transparently with complainants regarding the process. This should include for instance the stakeholder's right to anonymity, confidentiality, timelines for resolving grievances, and the final outcomes of the grievance process.
- Designate a representative within the company with the oversights and ultimate responsibility for the handling of complaints/grievances. There needs to be a clear internal structure that outlines who will process complaints and manage the investigations.

Supplementary information:

- **Operational-level grievance mechanisms**: Mechanisms that operate at the interface between a company and its affected stakeholders, and which are directly accessible to those that have been or are currently being impacted by a company's operations.

They perform two key functions:

1. Support the identification of adverse impacts as a part of a company's ongoing human rights due diligence, by providing a channel for those directly impacted by the company's operations. Systemic problems can also be identified and practices adapted accordingly.
2. Enables grievances to be addressed and harms to be remediated early and directly by the company.

- **UN's effectiveness criteria**: Outlines that a grievance mechanism should be legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on engagement and dialogues when consulting the intended stakeholder groups.
- **Remediation**: This is the process of providing a remedy to harm, which can include apologies, restitution, rehabilitation, financial or non-financial compensation, and punitive sanctions. Depending on who has been impacted, the remedial options and their effectiveness may differ based on context and circumstance.

Relevant links

- OHCHR Accountability and Remedy Project: Meeting the UNGPs' Effectiveness Criteria
- OHCHR: Access to Remedy





4. Environmental sustainability

4.1 General

Minimising our environmental impact is a core principle and a major component of Vattenfall's strategic direction. We believe continuous improvement in all areas of our operations is essential for sustainable business growth. That is why environmental considerations are embedded in our daily practices, and our success relies on the collective effort of our employees as well as our suppliers and partners. Our Environmental Policy is the roadmap driving us towards a sustainable future. It outlines our commitment to reaching net zero, actively safeguarding nature and biodiversity, and using resources sustainably. We believe in collaboration, and to achieve these ambitious goals, we expect our suppliers to join us on this journey and contribute to fossil freedom.

Vattenfall requires its suppliers and partners to:

- Conduct their business in compliance with all applicable environmental laws and regulations. This is applicable to suppliers' and partners' own operations as well as across their value chains.
- Adhere to relevant internationally agreed environmental standards. This is applicable to suppliers' and partners' own operations as well as across their value chains.
- Obtain and maintain all necessary environmental permits and licences, and comply with the requirements of such permits and licences.
- Take a precautionary approach in order to avoid, prevent and minimise potential risks and adverse impacts on the environment and ecosystems as a result of suppliers' and partners' operations.

Vattenfall encourages its suppliers and partners to:

- Employ a precautionary approach as outlined above across their value chain activities.

Examples of good practice:

- Continuously review current and future local environmental legislation to understand the impacts these may have on business operations.
- Develop practices that ensure responsible management of your operations in relation to the environment, and ensure these practices are adopted by the company's suppliers and partners.

Vattenfall documents:

- Please read more in Vattenfall's Environmental Policy

Relevant links:

- OECD Due Diligence Guidance for Responsible Business Conduct
- Greenhouse Gas Protocol
- Declaration of the United Nations Conference on the Human Environment (Stockholm Declaration), 1972 and the Rio Declaration on Environment and Development, 1992



4.2 Environmental management system

As a leader in environmental sustainability, it is important to have a strong foundation upon which our environmental work can continue to improve. Part of this foundation includes having an established, suitable management system to improve environmental performance, set targets, and perform follow-ups. Vattenfall has certified management systems in place for almost 100% of our energy production and energy management sites. It ensures that our work is systematic, organised, and is steered in an efficient manner which ensures continuous improvement of our environmental performance.

Vattenfall requires its suppliers and partners to:

- Proactively and responsibly manage their operations in relation to the environment.
- Employ a structured and systematic approach to identify, assess and manage potential adverse environmental impacts, proportionate to the supplier's and partner's size, nature, and environmental risk profile.
- Have appropriate measures in place to assess and minimise environmental impacts and improve environmental performance where their activities have the potential to result in material negative environmental impacts, whether individually or cumulatively.
- Have a documented management system in place which includes target setting and performance of follow ups.
- In the case of material environmental incidents occurring, have processes in place to report incidents to relevant authorities and to Vattenfall and to ensure implementation of appropriate corrective actions.

Vattenfall expects its suppliers and partners to:

- Clearly assign responsibility for managing environmental impacts within their organisation.

Vattenfall encourages its suppliers and partners to:

- Align their environmental management systems with globally recognised standards, such as ISO 14001 or equivalent, and to obtain external validation where feasible.

Examples of good practice:

- Provide training to employees on environmental awareness and on the environmental management systems being used.
- Develop an environmental policy and communicate it both externally and internally.
- Implement adequate emergency procedures related to potential environmental risks identified.
- Develop Environmental Management Plans to document measures and procedures to achieve compliance with environmental protection and legal requirements.

Vattenfall documents:

- Please read more in Vattenfall's Environmental Policy

Relevant links:

International Organisation for Standardisation, specifically the standards listed below:

- ISO14001:2026
- Eco-Management and Audit Scheme (EMAS)

4.3 Environmental protection

One of Vattenfall's top priorities in its daily operations is to safeguard the environment and use resources sustainably. Vattenfall consistently evaluates the impact of its operations on the environment and aims to preserve nature and biodiversity whilst using resources in a sustainable manner. We have similar expectations on our suppliers. .

Vattenfall expects its suppliers and partners to:

- Adhere to the requirements laid out in the below sections relating to environmental protection, specifically concerning climate, circularity and biodiversity.
- Work to reduce negative impacts on the environment, in particular with regards to the below dimensions of climate, circularity and biodiversity, and where negative impacts cannot fully be prevented or minimised, implement appropriate mitigation, compensation and/or restoration measures.

Vattenfall additionally encourages its suppliers and partners to:

- Use Best Available Technologies to avoid, prevent and minimise potential risks and adverse impacts on the environment, ecosystems and local communities.

Examples of good practice:

- Set targets which specifically address environmental protection.
- Regularly review Best Available Technologies in your industry to understand where to best implement them in your operations.
- Actively follow the mitigation hierarchy (see figure below) to minimise adverse impact on the environment and ecosystems.

Relevant links

- Mitigation hierarchy guideline
- Environmental Impact Assessment - European Commission



4.3.1 Climate

Vattenfall is committed to reach net-zero by 2040. This is part our of commitment to work towards a future where we limit climate change and enable a fossil-free society. To achieve this objective, Vattenfall is committed to reducing greenhouse gas emissions across its entire value chain. Collaborating with customers, suppliers and partners is crucial for Vattenfall to achieve our Net Zero 2040 commitment.

Vattenfall requires its suppliers and partners to:

- Address climate-related impacts in their own operations through appropriate mitigation measures and continuous improvement efforts, contributing to the reduction of greenhouse gas emissions (scope 1 and 2).

Vattenfall expects its suppliers and partners to:

- Apply a similar approach to indirect greenhouse gas emissions (scope 3), such as reducing material emissions from purchased materials, transport-related activities, and waste management.

Vattenfall encourages its suppliers and partners to:

- Align their climate work with globally recognised standards such as the Greenhouse Gas Protocol.
- Develop greenhouse gas emission reduction targets in line with the Paris Agreement's 1.5-degree scenario.
- Gain external validation of climate targets, for example through the Science Based Targets initiative.
- Develop climate transition plans.
- Implement climate adaptation activities where applicable.
- Engage their own supply chains on climate change mitigation and adaptation measures.
- Encourage their own suppliers and partners to address greenhouse gas emission reductions, through setting of time-bound climate targets which are aligned with the Paris Agreement's 1.5-degree scenario.

Examples of good practice:

- Publicly report progress towards emissions reductions and target achievement, for example, to the Carbon Disclosure Project (CDP).
- Participate in industry collaborations to reduce greenhouse gas emissions.
- Include climate change aspects (risks and opportunities) early in decision-making, especially for new investments and asset builds.
- Identify cost effective greenhouse gas emission reduction opportunities, such as energy efficiency, waste reduction and management, and sustainable sourcing.

Vattenfall documents:

- Please read more regarding Vattenfall's environmental work and approach in Vattenfall's Environmental Policy

Relevant links:

- Greenhouse Gas Protocol
- Carbon Disclosure Project
- Science Based Targets initiative (SBTi)

4.3.2 Circularity

Sustainable resource use is one of Vattenfall's key priorities and we constantly strive to optimise the use of resources in our operations and value chain. We collaborate proactively with suppliers to secure the future supply of resources, reduce resource consumption and switch towards circular sourcing to accelerate our journey to fossil freedom. We are also collaborating with partners to develop circular business models that address society's key resource challenges and rethink our customer value propositions so that they are circular by design.

Vattenfall requires its suppliers and partners to:

- Manage hazardous substances responsibly in their operations and in the products and materials supplied.
- Substitute hazardous substances with less hazardous alternatives wherever possible.
- Reduce waste from their business activities.

Vattenfall encourages its suppliers and partners to:

- Apply the waste hierarchy to reduce waste from their business operations.
- Adopt circular practices throughout their value chains by applying a lifecycle perspective, promoting resource efficiency, reuse, repair and recycling, and using recycled or renewable materials where feasible.

Examples of good practice:

- Document and implement procedures for sorting, storing, transport, recycling and disposing of various types of waste
- Ensure all chemicals are stored, handled and transported in such a way that the ground, water or air are not contaminated and so that the risk of ignition or explosion is minimised.
- Design products or components to be durable, repairable, upgradeable, and easy to disassemble.
- Establish take-back, refurbishment, remanufacturing, or reuse programmes for products and equipment.
- Consider environmental impacts during product design, sourcing, use, maintenance, and end-of-life stages.

Vattenfall documents:

Vattenfall's circularity projects and ambitions

Relevant links:

- Waste and recycling - Environment - European Commission
  ISO 59004:2024 - Circular economy — Vocabulary, principles and guidance for implementation
- Circular Economy - Environment - European Commission



4.3.3 Biodiversity

Vattenfall is committed to protecting and enhancing biodiversity across our operations. Climate and biodiversity are closely linked as climate change is a key driver for biodiversity loss. Decarbonising our assets and our customers – and scaling up new fossil-free electricity – are important ways in which we contribute to the energy transition. Whilst working to reduce biodiversity impacts through innovative solutions in project development and site management, we also aim to address biodiversity in our supply chain by working with suppliers and partners to adopt biodiversity measures.

Vattenfall requires its suppliers and partners to:

- In the case of activities having potential material adverse impacts on biodiversity, have processes in place, proportionate to the supplier's and partner's size, nature and risk profile, to identify and assess these impacts and risks. This shall include impacts on and risks associated with ecosystems and species.
- Have strategies in place to address potential adverse material biodiversity impacts where such potential impacts are identified.

Vattenfall encourages its suppliers and partners to:

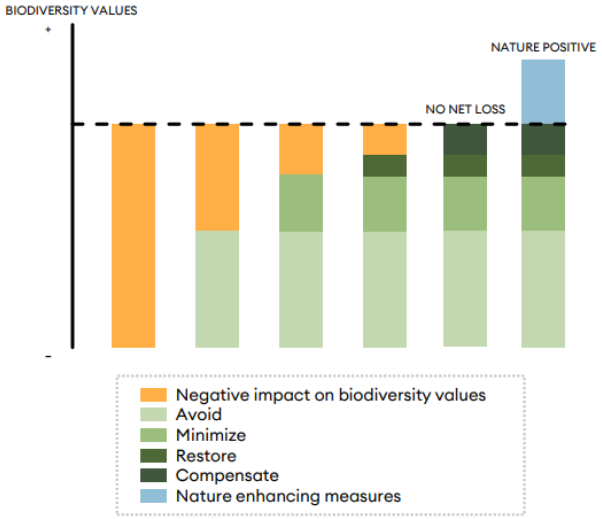
- Have similar knowledge of material impacts and risks related to biodiversity, ecosystems and species in their supply chains.
- Contribute to biodiversity enhancement and restoration and, where relevant, to consider dependencies on nature and ecosystem services.
- Align with the Kunming-Montreal Global Biodiversity Framework where appropriate to the nature and scale of operations.

Examples of good practice:

- Set biodiversity targets and report on progress.

Supplementary information

- **Mitigation Hierarchy:** Example in the case of the potential negative impacts on biodiversity values.
    - Identifying and assessing the potential damage of our projects
    - Avoid negative impacts of the operations
    - Minimise negative impacts that cannot be avoided
    - Restore the negative impacts of the operations
    - Compensate the residual damage to reach no net loss
    - Implement nature-enhancing measure



Vattenfall documents:

Vattenfall's Biodiversity Transition Plan 2030

Relevant links:

- Kunming-Montreal Global Biodiversity Framework
- 2030 Biodiversity Targets (with Guidance Notes)

4.4 Environmental performance

Vattenfall requests that its suppliers and partners provide transparent disclosures of their operational environmental impacts, encompassing, at a minimum, their Scope 1, 2, and 3 greenhouse gas emissions, climate change adaptation and mitigation efforts, resource and water use, and pollution management practices.

Vattenfall requires its suppliers and partners to:

- Transparently disclose environmental data and metrics to Vattenfall that are necessary for Vattenfall to fulfil its compliance and reporting obligations under law.

Vattenfall expects its suppliers and partners to:

- Upon request, disclose information on environmental impacts associated with their operations to Vattenfall, including but not limited to:
    - Greenhouse gas emission sources and emissions (Scope 1, 2 and, where relevant, Scope 3);
    - Climate change mitigation and adaptation measures and climate targets;
    - Resource use including energy, water, hazardous substances and materials;
    - Pollution and waste management; and
    - Biodiversity impacts, risks and management.

Vattenfall encourages its suppliers and partners to:

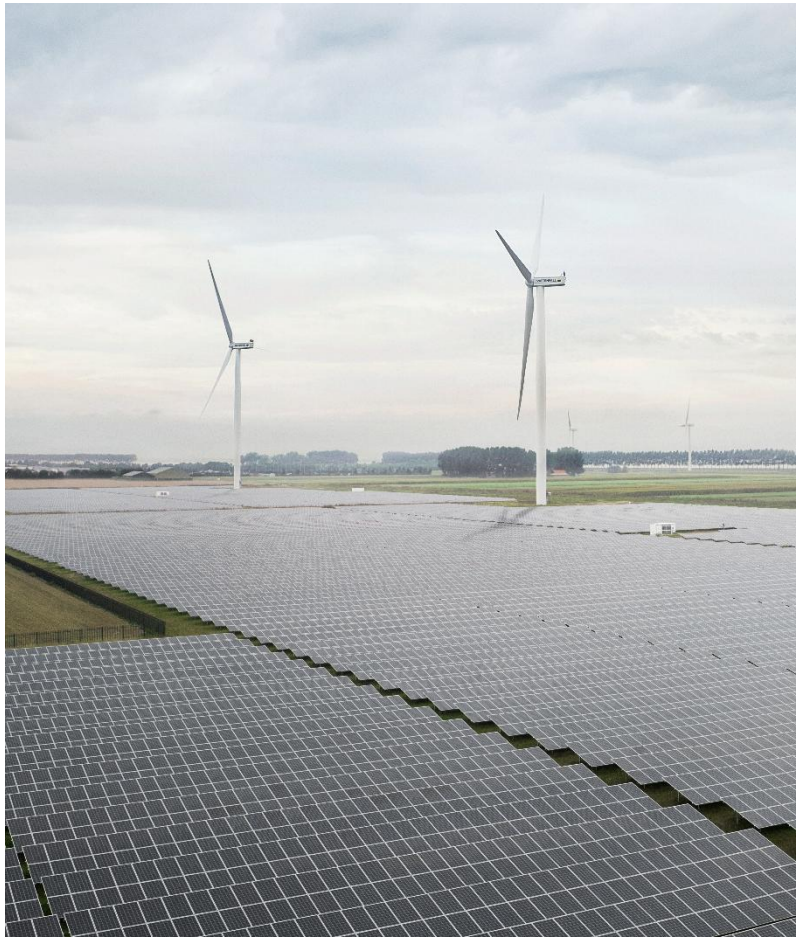
- Disclose equivalent information pertaining to their supply chains to Vattenfall. Disclosure should be proportionate to the supplier's or partner's size, nature and environmental risk profile.

Examples of good practice:

- Document Scope 1, 2 and 3 GHG emissions, including sources and boundaries applied as relevant.
- Work to increase transparency up the supply chain, to understand and communicate climate, biodiversity and resource-related impacts which have potential to occur upstream of the supplier and partners' own operations.
- Analyse risks that may emerge due to future restrictions on, or impacts of, greenhouse gas emissions.

Vattenfall documents:

- Please read more in Vattenfall's Climate transition plan





5. Business Integrity

5.1 General

At Vattenfall, we are committed to conducting business in a fair and responsible manner. Therefore all internationally agreed standards on business ethics are adhered to and all business is conducted in compliance with applicable national and international laws and regulations. This is also part of the Swedish state's ownership policy which stipulates that companies with state ownership shall act as a model in the area of sustainable business, which includes anti-corruption and business ethics. For this to be done, it is important that all Vattenfall employees have sufficient knowledge about applicable rules and regulations, as well as Vattenfall's overall approach to business integrity. It is the responsibility of all Vattenfall employees and managers to ensure that the company maintains a high level of integrity in everything that we do.

Vattenfall requires its suppliers and partners to:

- Conduct business in compliance with internationally agreed standards on business ethics.
- Adhere to applicable business integrity laws and regulations.

Examples of good practice:

- Continuously review current and upcoming laws, rules, and regulations regarding business ethics and integrity in the countries in which you operate to understand the impacts on your business operations.
- Establish clear responsibility over business ethics and integrity compliance in your company, both for day-to-day tasks and the overarching responsibility.
- Conduct regular internal reviews of your own business operations to identify areas of improvement. This can include internal audits, periodic risk assessments, and daily checks to ensure compliance with business integrity and ethics laws.
- Establish routines, including roles and responsibilities, for reviewing and responding to current and future laws, rules and regulations concerning business ethics and integrity.
- Develop and provide targeted trainings on business ethics and integrity to relevant people within your organisation on a regular basis.

Supplementary information:

- **Business ethics:** Refers to the principles that guide decision-making. These are standards and norms that govern the actions and behaviour of an individual in the business organization, based on what is widely considered ethical or unethical in a business context
- **Business integrity:** As outlined by the OECD, business integrity refers to ensuring a more ethical and accountable business landscape by implementing robust internal control, ethics and anticorruption measures, as well as corporate governance frameworks, due diligence practices and fair and open competition when interacting with companies and governments, both domestically and internationally.

Vattenfall documents:

- Vattenfall's Code of Conduct and Integrity

5.2 Corruption and financial crime

Vattenfall observes high standards of ethical and business conduct in its operations and is committed to combatting corruption in all its forms. Based on this commitment, as well as our zero-tolerance policy against bribes, we have established an integrity organisation and an internal governance framework for integrity issues. Within its scope, the integrity organisation supports Vattenfall in identifying, mitigating, managing and monitoring the risk of non-compliance with laws, regulations, rules, standards and codes of conduct, relevant to its activities.

Vattenfall requires its suppliers and partners to:

- Not engage in or tolerate any form of corruption, bribery, extortion, fraud or embezzlement.
- Not offer or accept any benefits in order to obtain any undue or improper advantage, or with the intention to let the receiver to act in breach of his or her professional duties
- Prevent and refrain from any involvement in labour market crime.

Vattenfall expects its suppliers and partners to:

- Take measures against and never tolerate any form of money laundering, tax fraud, tax evasion or other illegal financial schemes that may be indicated by the use of tax havens and jurisdictions prone to financial crime.

Examples of good practice:

- Ensure no improper benefits are offered or accepted from suppliers and partners. Improper benefits may comprise of cash, non-monetary gifts, pleasure trips or services and amenities of any other nature.
- Implement an anti-corruption policy, guidelines on anti-corruption and bribery, and clear decision-making processes/authorisation rights for invoices, expenses, benefits, etc.
- Implement integrity due diligence of business partners.
- Apply enhanced due diligence for suppliers, products, and countries where there is an increased risk of money laundering or corruption.
- Provide targeted anti-corruption trainings to all employees and board members and re-train employees in positions most exposed to bribery and corruption (such as sales, procurement, finance, management, etc) on a regular basis.

Supplementary information:

- **Corruption:** the abuse of entrusted power for private gain.
- **Bribery:** the offering, promising, giving, accepting or soliciting of an advantage to induce an action that is illegal, unethical or a breach of trust.
- **Labour market crime:** A set of systematic and intentional violations of laws and rules governing work and employment, carried out to gain unfair economic advantages. Labour market crime occurs when employers, intermediaries, or organised actors deliberately break labour, tax, migration, or social security rules, harming workers, legitimate businesses, and society at large.

Relevant links:

- United Nations Convention against Corruption

5.3 Trade control and sanctions

Vattenfall ensures that it abides by all regulations related to trade controls and economic sanctions that have an impact on its operations. This for instance includes screening potential suppliers against sanction lists. By adhering to these regulations, Vattenfall avoids legal or ethical issues related to the export of controlled products or trade with sanctioned entities.

Vattenfall requires its suppliers and partners to:

- Comply with applicable laws and regulations regarding trade control and trade restrictions.
- Comply with relevant economic sanctions.

Examples of good practice:

- Implement processes and procedures through which compliance with export control regulations and economic sanctions is ensured.
- Keep up to date with import and export rules and regulations for relevant markets and implement process through which these are followed.
- Continuously review economic sanction lists.
- Provide targeted trainings on trade control and trade sanctions to relevant internal target groups on a regular basis.

Supplementary information:

- **Export controls**: Regulations that govern the export of certain goods, technologies, and services from one country to another.
- **Economic sanctions**: Measures taken by governments or international organizations to restrict trade and financial transactions with certain countries, entities, or individuals.



5.4 Conflict of interest

Vattenfall expects its employees to act in Vattenfall's best interests and to avoid conflicts of interest that could compromise the employees' credibility within Vattenfall or external parties' confidence in Vattenfall. If conflict of interest situations are not properly identified and managed, the integrity of a company can be seriously endangered and damaged. Therefore, all employees at Vattenfall must avoid investment, involvement, and secondary employment in companies that are customers, suppliers, or other business partners of Vattenfall, which may lead to a conflict of loyalty with Vattenfall. We expect the same of our suppliers and partners.

Vattenfall requires its suppliers and partners to:

- Avoid conflicts of interest that may compromise the supplier's or partner's credibility or third parties' confidence in Vattenfall.

Examples of good practice:

- Establish a policy on Conflicts of Interest adapted to the company's size, nature of business activities, area in which operations occur, the complexity of the legal environment, and the governance structure.
- Develop procedures, measures, and responsibilities to enable the identification and prevention of conflicts of interest. A compliance officer or another manager who is a specialist in ethics and compliance, from the legal department, or from the HR department should be responsible for the implementation of such procedures and measures.
- Develop trainings or sessions to ensure all employees understand whether their duties or responsibilities to your company can be affected, or perceived to be affected, by another interest or duty that the employee may have, and how to solve a conflict of interest.

Supplementary information:

- **Conflicts of interest:** These may arise when the private or personal interests of an individual or of his/her close relatives, friends or business contacts diverge from those of the organisation to which the individual belongs. Conflicts of interest may lead to corrupt practices, and can occur on all levels of governance and in all areas of human relationships.
- In addition to abstaining or withdrawing from debating, voting, or taking part in decision-making processes or activities where a conflict of interest exists, the following actions can be taken:
    - **Avoidance** – a conflict of interest can be avoided, by for example giving up a role with a competing business or selling a shareholding in a supplier.
    - **Disclosure** – if a conflict of interest is known to all parties involved through disclosure of it to them, this may allow a relationship to go ahead.
    - **Stepping back** – it may be appropriate for someone subject to a conflict of interest not to become involved in a decision that may be affected by the conflict of interest.
    - **Refusal** – rejecting the circumstance creating a conflict of interest will eliminate the conflict of interest all together.

Relevant links:

- International Chamber of Commerce: Guidelines on Conflicts of Interest

5.5 Competition law

Effective competition between businesses delivers open, dynamic markets and drives productivity, innovation and value for consumers. EU competition law prohibits anticompetitive agreements between companies and the abuse of dominant power. Vattenfall is committed to and shall only use fair means of competition throughout its business activities. As it is truly beneficial from a business perspective, Vattenfall shall not only comply with the competition rules but also act according to high business standards and expectations from customers and the public.

Vattenfall requires its suppliers and partners to:

- Respect and comply with applicable competition laws and regulations
- Not exchange commercially sensitive and strategic information with competitors
- Not enter into anti-competitive agreements with any business partner.

Examples of good practice:

- Follow applicable competition laws, including EU competition law which prohibits anticompetitive agreements between companies and the abuse of a dominant position.
- Do not engage in any anti-competitive information exchange with any actual or potential competitor.

Supplementary information:

Anti-competitive behaviour entails any illegal contracts and agreements between companies that are aimed at restricting competition. The most common practices are:

- **Price fixing:** An agreement among competitors to raise, lower, maintain, or stabilize prices or price levels.
- **Market sharing:** An agreement among competitors to divide or allocate customers, suppliers or geographic areas amongst themselves rather than making independent decisions on this.
- **Agreement on customer allocation:** An agreement among competitors to assign specific customers or sales territories among themselves.
- **Agreement on production limitation:** An agreement among competitors to limit the output of sales, with the intention of influencing the price of products and/or services.
- **Distribution agreements:** An agreement among competitors on the price charged to customers
- **Abuse of a dominant position:** If your company has a large market share, it holds a dominant position and must take particular care not to:
    - Charge unreasonably high prices which would exploit customers.
    - Charge unrealistically low prices which may drive competitors out of the market.
    - Discriminate between customers.
    - Force certain trading conditions on your business partners.

Relevant links:

- EU Competition Law

5.6 Protection of intellectual property rights and confidential information

Vattenfall expects its suppliers and partners to respect its intellectual property rights and to take appropriate measures to protect the company's information. This includes safeguarding against misuse, theft, fraud, or improper disclosure of Vattenfall's patents, trademarks, copyrights, and trade secrets. Intellectual property rights are critical to Vattenfall's business success, as they protect the company's innovations, branding, and creative works from unauthorized use or reproduction. Suppliers and partners must therefore ensure that they do not infringe on Vattenfall's intellectual property rights or engage in any activities that could compromise the confidentiality or integrity of the company's information.

Vattenfall requires its suppliers and partners to:

- Respect Vattenfall's intellectual property rights.
- Protect Vattenfall's information by safeguarding it against misuse, theft, fraud or improper disclosure.

Examples of good practice:

- Have formal policies for the protection of classified or otherwise sensitive information.
- Ensure non-disclosure and protection of information about its customers, channel partners, suppliers, workers, and other business partners in accordance with applicable laws and regulations.
- Ensure IT measures and guidelines are in place about the handling, distribution/dissemination of information to protect information from suppliers and customers and intellectual property.
- Ensure that personal information protection agreements, such as Non-Disclosure Agreements, confidentiality agreements, etc., are in place for staff, workers, suppliers, and customers.
- Maintain physical and electronic security for all sensitive information.

Supplementary information:

- Treat information from or relating to Vattenfall with at least the same level of confidentiality as the supplier's own information.
- Exercise caution when discussing Vattenfall's information, to avoid being overheard by unauthorized persons.

6. Reporting irregularities to Vattenfall – Whistleblowing

If a supplier or partner, its employees, consultants and contractors, local communities, or any other stakeholder believes that the terms of the Code of Conduct for Suppliers and Partners are not adhered to, or that Vattenfall is not acting in accordance with its own Code of Conduct and Integrity, Vattenfall encourages such concerns to be raised via the whistleblowing channel.

Supplementary information:

Examples of serious violations that can be reported:

- Bribery and corruption
- Breaches of human rights
- Conflict of interest
- Fraud
- Improper use of inside information
- Theft and embezzlement
- Unfair competition practices

Reporting through the Whistleblowing Channel may be done anonymously.

How to report a concert through Vattenfall's Whistleblowing channel:

1. Vattenfall's web-based Whistleblowing Channel is available 24/7, 365 days a year. The Whistleblowing Channel can be accessed by following this link: **Vattenfall Whistleblowing channel**
2. A concern may also be directly reported to the Group Internal Audit department or any of the Whistleblowing coordinators at Vattenfall either by e-mail or phone (see the contact details below).
3. As a complement to the above two reporting lines, a whistleblowing report could also be made to one of Vattenfall's external ombudspersons. The ombudspersons are experienced lawyers independent from the Vattenfall Group. They shall act in accordance with professional discretion. Also such a report could be made anonymously in relation to Vattenfall.

Non-retaliation commitment:

It is strictly prohibited for all Vattenfall employees and other representatives to attempt to determine the identity of a whistleblower. Vattenfall also prohibits all retaliation of any type against a whistleblower who have brought forward a concern in good faith. Any such confirmed violations may lead to disciplinary sanctions, including the possibility of dismissal and termination of hire.

Relevant links:

- Vattenfall Whistleblowing channel

Whistleblowing coordinators at Vattenfall

Denmark	**Finland, France, Poland, Sweden**	**Germany**	**Netherlands**	**United Kingdom**
Jens Kirk Jørgensen +45 27 87 58 37 Email:jens.kirk.jorgensen@vattenfall.com	Martin Åberg +46 709 100 683 Email: martin.aberg@vattenfall.com	Kristina Stone + 49 151 2073 9459 Email: kristina.stone@vattenfall.de	Floortje Algera +31 655 386 451 Email: floortje.algera@vattenfall.com	Bobby Sharma +44 20 33 01 64 50 Email: bobby.sharma@vattenfall.com

Vattenfall's external ombudsmen

Dr. David Albrecht Fachanwälte für Strafrecht am Potsdamer Platz mbB, Germany +49 30 318 685 44 Email: ombudsmann-vattenfall@fs-pp.de	Sophia Hoffmeister Fachanwälte für Strafrecht am Potsdamer Platz mbB, Germany +49 30 318 685 44 Email: ombudsperson-vattenfall@fs-pp.de


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