

Ørsted

Response received by BHRRC from Ørsted regarding assessment of exposure to and steps taken in response to forced labour issues in XUAR as documented by Sheffield Hallam University, among others, 14 July 2023.

(1) Assessment of exposure & (2) Steps taken in response

“Since we became aware of the issue and read the reports including the *Broad Daylight* one, we have engaged in the following actions to address the issue on forced labour:

- We have strengthened the language in our contracts requiring supply chain traceability and transparency on solar PV supplies.
- Our solar PV suppliers have committed that their products do not contain Xinjiang sourced poly for our existing US bound projects, and we are working on similar requirements for new projects in other markets as well.
- We have engaged with external supply chain consultants to separately verify the ability of key global solar PV module vendors to comply with our chain of custody requirements. This has provided us with up-to-date insights into the value chain integration, and general sustainability performance and traceability competences of key global solar PV suppliers.
- We are engaged in SolarPower Europe’s Supply Chain Transparency Working Group to support the further development of the Solar Stewardship Initiative, which seeks to establish a responsible solar value chain. We have also signed the Solar Industry Forced Labor Prevention Pledge initiated by the Solar Energy Industries Association.
- Our due diligence activities and general dialogue with suppliers around our Code of Conduct takes point of departure in the ability to deliver solar PVs with traceability of sub-components and raw materials as well as the supplier’s ability to cascade our Code of Conduct requirements down their supply chain and perform adequate supplier due diligence.
- Our current approach seeks to ensure that we do not have any supplies linked to the forced labour issues in Xinjiang, and we have not been engaged in any direct steps towards remediation. “