



Vestas – Australian Wind Technology Pty Limited

Modern Slavery Statement for reporting year 1 January – 31 December 2024

*This statement reports on the risks relating to modern slavery and human trafficking within Vestas – Australian Wind Technology Pty Limited (**Vestas Australia**), and actions taken to address those risks, pursuant to section 13 of the Modern Slavery Act 2018 (Cth) (the **Act**). This statement is provided by Vestas Australia, a ‘reporting entity’ under s 5 (1)(a)(i) of the Act.*

The reporting entity

About Vestas Australia

Vestas Australia is a limited company registered in Australia on 22 September 1999. Its registered office is located at Level 4, 312 St Kilda Road, Melbourne, VIC 3004.

Vestas Australia is comprised of approximately 785 employees across Australia and had revenue of AUD1.95 billion between 1 January – 31 December 2024.

Structure, Operations and Supply Chains of the Reporting Entity

Structure & Operations

Vestas Australia is a wholly owned subsidiary of Vestas Wind Systems A/S (**Vestas**) and operates as part of the Asia Pacific division within the global Vestas group.

Vestas is a global leader in wind energy, engaged in the design, manufacturing, installation, and servicing of wind turbines. In Australia, Vestas Australia delivers wind turbine sales, construction, operations, and maintenance services tailored to the local market.

Headquartered in Denmark, Vestas employs over 35,000 people worldwide and maintains a presence across five commercial regions: Mediterranean, Latin America, North America, Northern and Central Europe, and Asia Pacific. The company has manufacturing, assembly, and R&D facilities in 10 countries and has installed wind turbines—both onshore and offshore—in more than 87 countries. In 2024, Vestas reported revenue of EUR 17.3 billion.

Vestas’ organizational structure comprises six Executive Vice President areas: Finance, Sales, Service, Technology & Operations, People & Culture (**P&C**), and Development & Digital Solutions.

For further information visit www.vestas.com.

Supply Chain

Vestas maintains a global supplier network to support its operations. Suppliers are categorized into three scopes:

- **Direct scope:** Suppliers that provide components and materials used in the manufacturing of Vestas wind turbines.
- **Indirect scope:** Suppliers that deliver services to Vestas’ factories and wind parks.
- **Service scope:** Suppliers that support Vestas’ service operations.

Supplier expenditure is primarily distributed across the following categories:

- **Direct procurement:** Includes blades, nacelles, towers, steel, hubs, electrical systems, and powertrain components.
- **Indirect procurement:** Covers transport, construction, IT and business services, capital expenditures, tools, and maintenance, repair, and operations.
- **Service procurement:** Encompasses materials and solutions required to support service activities.

Policies and Governance Mitigating Modern Slavery Risks

Vestas’ Global Corporate Social Responsibility (**CSR**) and Compliance team includes human rights specialists based in Denmark, Mexico, and India. This team collaborates closely with the Sustainable Procurement function—also equipped with human rights expertise—as well as other departments across the organisation to ensure that human rights principles are fully integrated into Vestas’ operations.

Since 2009, Vestas has been a member of the United Nations Global Compact (**UNGC**) and is committed to upholding its ten principles. This includes Principle 4, which calls for the elimination of all forms of forced and compulsory labour. The policies and procedures outlined in this section demonstrate how Vestas puts this commitment into practice across its business and supply chain.

Codes of Conduct

Vestas adheres to a set of Codes of Conduct that define the ethical standards and expectations for

both employees and suppliers. These include an Employee Code of Conduct and a Supplier Code of Conduct.

Both codes reflect Vestas' commitment to the United Nations Guiding Principles on Business and Human Rights (**UNGPs**). Additionally, Vestas aligns its practices with the OECD Guidelines for Multinational Enterprises on responsible business conduct.

A key principle in both codes is the strict prohibition of modern slavery and human trafficking across all areas of Vestas' global operations.

The Supplier Code of Conduct outlines Vestas' expectations in four key areas:

1. Human Rights and Labour Rights
2. Working with Integrity
3. Respecting the Environment
4. Fair Business Practices

Compliance with this code is a mandatory part of all Vestas purchasing agreements and applies to all suppliers and their supply chains. Suppliers are required to adhere to the code, and failure to do so may lead Vestas to take risk mitigation measures, including the potential termination of the business relationship.

Both codes can be found at www.vestas.com.

Human Rights Policy

Aligned with the UNGPs, Vestas' Human Rights Policy affirms the company's commitment to respect human rights, avoid infringing upon them, and address any negative impacts it may be connected to.

The policy explicitly states Vestas' dedication to preventing the use of forced or compulsory labour in any part of its operations.

The Human Rights Policy is formally endorsed by the Chairman of Vestas, underscoring its importance at the highest level of governance. Additionally, the policy outlines Vestas' efforts to encourage its suppliers and business partners to uphold human rights standards. It is shared across the entire organization and made publicly available on www.vestas.com.

To manage human rights risks within its supply chain, Vestas integrates the principles of its Human Rights Policy into supplier onboarding and auditing processes. This approach supports the development of a sustainable and resilient supply

base. Furthermore, Vestas addresses potential risks related to workers in its value chain through its dedicated Conflict Minerals Policy.

Conflict Minerals Policy

Vestas has established a dedicated Conflict Minerals Policy that underscores its commitment to responsible sourcing, in line with the OECD Due Diligence Guidance. Through its Conflict Minerals Programme, Vestas works closely with suppliers to ensure that minerals and metals — specifically tin, tantalum, tungsten, and gold (commonly referred to as 3TGs) — used in its turbines are not sourced from conflict-affected or high-risk areas.

This policy applies to all eligible direct suppliers. To address risks related to workers in the value chain, Vestas uses its influence to require suppliers to conduct enhanced due diligence when potential risks are identified. The policy is formally endorsed by Vestas' Head of Global Procurement and is publicly available on the company's corporate website.

Recruitment Policy and Processes

Vestas has implemented a comprehensive recruitment policy grounded in the principles of consistency, global alignment, and compliance with relevant laws. This policy applies uniformly to all employees across the organization. The recruitment process is structured, thorough, and designed to ensure fairness and efficiency.

Employee recruitment at Vestas is managed by the Vestas Recruitment Team, which operates under the P&C function. This team follows the Global Recruitment Process, a standardized framework that ensures a consistent and effective approach to talent acquisition. It includes detailed guidelines, templates, and a global toolkit to support uniform recruitment practices across all regions.

A significant portion of the recruitment process is outsourced to a global recruitment partner, who is contractually obligated to comply with Vestas' Recruitment Framework and Supplier Code of Conduct. This ensures that ethical standards and responsible practices are maintained throughout the hiring process.

Each region has a designated Regional Recruitment Manager responsible for overseeing the implementation of the Global Recruitment Process by the recruitment partner. These

managers ensure that the process is applied consistently and accurately across all locations.

The Vestas Recruitment Team also collaborates closely with hiring managers, offering training and support to ensure adherence to the Global Recruitment Process and uphold Vestas' commitment to ethical and effective recruitment.

Training & Capacity Building

To ensure consistent adherence to its policies, procedures, and standards, Vestas has established a robust Training & Capacity Building programme. This initiative is designed to equip both internal recruitment personnel and external recruitment partners with the knowledge and skills necessary to uphold Vestas' recruitment standards.

Training begins during the onboarding phase, where new employees and partners are introduced to the Global Recruitment Process, which outlines Vestas' recruitment standards and procedures. They are also familiarized with the Recruitment Framework and Employee Code of Conduct, both of which emphasize ethical recruitment practices and compliance with labour laws.

Training at Vestas is not a one-time event—it is an ongoing process. The company regularly conducts training sessions, workshops, and seminars to keep employees and partners informed about evolving recruitment trends, updates to labour legislation, and changes to internal policies. These sessions are led by experienced professionals and industry experts, ensuring that the content remains relevant, practical, and impactful.

Access to Remedy: EthicsLine

Vestas encourages employees, suppliers, supply chain workers, and customers to report any observed or suspected misconduct through its whistle-blower hotline, EthicsLine. This secure, externally hosted platform allows individuals to raise concerns confidentially, with the option to remain anonymous—except where anonymity is restricted by law.

All reports submitted via EthicsLine are handled with care and investigated thoroughly, in accordance with applicable laws. Vestas is committed to ensuring that everyone involved in the process is treated fairly and respectfully.

Importantly, Vestas maintains a zero-tolerance policy against retaliation. Individuals who report

concerns in good faith are protected, regardless of whether the report is ultimately substantiated. The same protection extends to individuals who participate in investigations, such as witnesses.

EthicsLine can be accessed at vestas.whistleblownetwork.net, the Vestas Compliance app, Vestas' intranet and by phone.

Risks of Modern Slavery

Risks in Vestas' Operations

The recruitment of factory workers at Vestas is managed through localized recruitment processes at each factory, often involving local recruitment agencies. Vestas has identified the use of such agencies as a potential risk factor for modern slavery within its operations.

To address this risk, Vestas launched a pilot programme in Denmark aimed at developing a simplified and standardized hiring process within its Human Resources information systems. This new process is designed to align with recruitment procedures used across other areas of the company..

In 2020, Vestas conducted a global mapping of all recruitment providers at the factory level. This initiative enabled the company, starting in 2021, to streamline its recruitment partnerships by reducing the number of providers and ensuring alignment with global procurement standards. This includes compliance with Vestas' contracting requirements and adherence to the Supplier Code of Conduct.

Throughout 2023 and 2024, Vestas focused on establishing a global standard for selecting and managing recruitment suppliers for factory workers. Several factories have already been integrated into this formal recruitment process, with parts of the process now managed centrally. Over the coming years, Vestas plans to expand this approach to include additional factories.

Risks within Supply Chain

Vestas operates within a global supplier network that includes both upstream suppliers—who manufacture components and materials—and downstream suppliers—who deliver products and services at wind farm sites. These partnerships are essential to Vestas' business strategy, but they also carry the potential for negative impacts within the value chain.

To identify, manage, and mitigate such risks—whether Vestas contributes to them directly or is linked indirectly—suppliers are required to take diligent and reasonable steps to prevent human rights and labour rights violations within their own supply chains. These expectations are clearly outlined in Vestas' Supplier Code of Conduct.

Vestas' value chain involves a diverse workforce, including individuals working in suppliers' manufacturing facilities, those involved in raw material extraction, and contractors responsible for constructing and servicing wind turbines at project sites. Recognizing the complexity and risks in this environment, Vestas is committed to promoting fair treatment and equal opportunities for all workers—especially vulnerable groups such as migrants, young workers, and women, particularly in high-risk regions.

Corporate Wide Human Rights Assessment

Vestas' Corporate-Wide Human Rights Assessment (**CW-HRA**) serves as the cornerstone for identifying potential adverse human rights impacts and risks across the company's operations and supply chain. It plays a critical role in guiding the development of appropriate actions and responses.

To enhance its human rights governance, Vestas established a cross-functional steering committee in 2023. This committee includes representatives from CSR, P&C, Sustainable Procurement, and Health, Safety & Environment. Throughout 2024, Vestas continued implementing the CW-HRA's recommendations.

Key human rights priorities within the supply chain include:

- Child labour and forced labour
- Occupational health and safety
- Working hours
- Wages and benefits
- Operations in high-risk and conflict-affected areas

Actions Taken to Address Modern Slavery Risks

In alignment with Vestas' global approach, Vestas Australia has undertaken a series of actions during the reporting year aimed at addressing the risks of modern slavery and human trafficking.

Due Diligence

Vestas employs a supplier due diligence framework that addresses potential adverse impacts and risks across its entire value chain, focusing on both direct and indirect suppliers with whom it holds contractual relationships. At the core of this framework is the Supplier Code of Conduct, which sets clear expectations for suppliers and their subcontractors regarding labour practices and human rights.

As part of the onboarding process, new suppliers are screened for sanctions and ethical risks. They are then required to complete a Supplier Registration Questionnaire, which includes a formal commitment to comply with the Supplier Code of Conduct. This commitment is a prerequisite for proceeding to the next stage: the Supplier Business Assessment (**SBA**), which is tailored to the specific scope of supply. SBA results are verified through either onsite or desktop assessments.

For indirect suppliers, Vestas applies a risk matrix that incorporates onboarding questionnaire responses and global risk intelligence to determine whether an onsite assessment is necessary. In contrast, all direct suppliers undergo onsite assessments by default—unless their scope of work is deemed low-risk.

These assessments are typically conducted by Vestas' internal teams and include a review of supplier policies and management systems related to human and labour rights. When risks or gaps are identified, corrective action plans are developed to address and resolve the issues.

Conflict Minerals

To mitigate the risk of forced and child labour in raw material extraction, Vestas has implemented a Conflict Minerals Programme (**CMP**). This programme conducts annual surveys of first-tier component suppliers using a third-party supply chain data management solution.

In 2024, Vestas completed its fourth CMP survey, engaging 181 suppliers, down from 197 in 2023. This reduction reflects Vestas' ongoing efforts to exclude suppliers who have previously confirmed that their products do not contain 3TGs.

This targeted approach enhances the effectiveness of Vestas' due diligence efforts by focusing on suppliers where risks are most likely to occur. Risk

identification is based on self-reported supplier data, including the country of origin. Vestas' supplier response rate improved from 98% in 2023 to 99% in 2024, demonstrating strong engagement.

Additionally, Vestas participates in an annual smelter outreach coordinated by its third-party vendor. Through this initiative, smelters in Vestas' supply chain are encouraged to participate in the Responsible Minerals Assurance Process, which involves independent audits to verify responsible sourcing practices.

Other Initiatives

Mapping of EU Critical Raw Materials

In 2024, Vestas launched a cross-functional initiative to map the minerals covered under the EU Critical Raw Materials Act, including both conflict minerals and rare earth elements. This mapping effort is scheduled for completion by mid-2025.

The objective is to identify which turbine components contain these critical minerals and to establish a traceability programme similar to the existing CMP. This will enable Vestas to trace the origin of raw materials used in its turbines, ensure that suppliers source from conformant smelters, and ultimately help mitigate the risk of adverse human rights impacts within the supply chain.

Upstream human rights risk heatmap

In 2024, Vestas launched a Human Rights Risk Heatmap initiative to strengthen its ability to identify and mitigate potential adverse impacts on workers across its value chain. This initiative leverages Vestas' influence and partnerships to promote responsible practices throughout the supply chain. As part of this effort, Vestas collected data from select Tier-1 suppliers regarding their own supply chains. By collaborating with a third-party risk intelligence provider, Vestas enhanced transparency and developed a heatmap that highlights areas with elevated human rights risks.

The results of this analysis have been shared with relevant suppliers, who are now expected to conduct appropriate due diligence and implement mitigation measures where risks have been identified.

Wind Energy Initiative and EcoVadis implementation

In 2024, Vestas joined the Wind Energy Initiative — a multi-stakeholder collaboration involving EcoVadis, WindEurope, other OEMs, and customers — focused on advancing sustainability in the wind energy supply chain. Recognizing the critical importance of supply chain transparency and performance, the initiative aims to raise standards across key environmental, social, and governance (**ESG**) areas.

As part of this commitment, Vestas will adopt the EcoVadis assessment platform. Through this third-party evaluation process, suppliers will receive validated scorecards and tailored improvement plans, enabling them to strengthen their ESG performance and contribute to a more responsible and resilient supply chain.

Based on the results of these assessments, Vestas will collaborate with suppliers to implement corrective actions and improvement plans to address any identified sustainability gaps.

Supplier Engagement

In 2023, Vestas Australia began surveying its direct suppliers identified as high or medium risk within Australia using a voluntary Modern Slavery Self-Assessment Questionnaire. This questionnaire was designed to assess the foundational systems and policies these suppliers have in place to address modern slavery risks.

In addition to the questionnaire, Vestas Australia conducts supplier audits, which include random checks of employment contracts and other relevant documentation. These audits aim to verify that supplier employees are working voluntarily and that other relevant standards are being met.

Furthermore, Vestas Australia has made it a mandatory requirement for contracts with high- and medium-risk direct suppliers to include specific clauses addressing modern slavery risks. These are in addition to the standard contractual obligation to comply with Vestas' Supplier Code of Conduct.

Continuous Improvement

Ongoing monitoring is essential to ensuring that existing suppliers continue to meet Vestas' standards. This includes conducting ad hoc assessments triggered by credible information, such as media reports or other substantiated sources.

While Vestas works collaboratively with suppliers to improve their performance, the company is prepared to terminate relationships if significant concerns remain unresolved. This firm stance reinforces Vestas' commitment to upholding its Supplier Code of Conduct, which plays a critical role in protecting workers throughout the supply chain from potential risks.

Assessing and Measuring Effectiveness

Vestas has not yet established specific targets for workers within its value chain, as the company is currently revising its supply chain due diligence framework. This revision includes evaluating new initiatives to better track and assess the impact of actions taken to support value chain workers.

Looking ahead to 2025, Vestas plans to explore options for setting measurable targets and tracking the effectiveness of its policies and actions through improved data collection. In the meantime, as part of ongoing supplier management, Vestas continues to assess supplier performance and monitor compliance with its standards.

In 2024, Vestas carried out the following supplier due diligence activities:

- Conducted 2,110 screenings of potential suppliers as part of its due diligence process.
- Completed 141 onsite assessments of both direct and indirect suppliers.
 - Of these, 114 suppliers scored above 70%, meeting Vestas' acceptable risk threshold.
 - 27 suppliers scored below 70%; among them, 52% developed and agreed to corrective action plans focused on safety and sustainability in collaboration with Vestas.
 - Six suppliers were ultimately rejected due to unresolved concerns.

EthicsLine

EthicsLine is Vestas' primary mechanism for identifying, reporting, and investigating concerns in a timely, independent, and objective manner, as outlined in the EthicsLine Policy. It is accessible to both internal and external stakeholders.

To raise awareness of EthicsLine, Vestas conducts regular training sessions and communication initiatives across the organization. Training materials—available in multiple languages—are hosted on the company intranet and include anonymized case examples to illustrate how

EthicsLine is used. In 2024, employees responsible for managing cases received specialized training in case handling. During 2024, 757 EthicsLine cases were reported. Of these:

- 147 cases were substantiated, including 78 related to social or human rights issues such as employment termination.
- 500 cases were found to be unsubstantiated.
- The remaining cases were still under investigation at year-end.

Grievance Mechanisms in Supply Chain

In addition to encouraging suppliers to establish their own grievance mechanisms, Vestas' Supplier Code of Conduct makes EthicsLine available to suppliers and supply chain workers for raising concerns anonymously.

To support access to remedy in cases of actual or potential harm, Vestas has implemented a structured process to manage, track, and monitor reports from supply chain workers. These cases are categorized separately within the EthicsLine system to ensure focused attention.

- If a case involves a Vestas employee, it is jointly managed by the EthicsLine function, Sustainable Procurement, and the supplier, as needed.
- If no Vestas employee is implicated, the case is referred directly to the supplier for resolution.

In 2024, 11 concerns were reported by supply chain workers via EthicsLine. Two of these were substantiated and addressed in collaboration with the relevant suppliers. One additional case, reported in 2023, was investigated by the supplier and found to be unsubstantiated.

While Vestas does not currently conduct systematic assessments of worker awareness or trust in grievance mechanisms, anecdotal feedback suggests varying levels of awareness among value chain workers.

In line with the EU Whistleblowing Directive, Vestas ensures the effectiveness of EthicsLine by:

- Making it accessible to value chain workers
- Protecting reporters from retaliation
- Maintaining confidentiality
- Providing timely feedback
- Ensuring objective investigations
- Promoting transparency throughout the process

EthicsLine is governed by the EthicsLine Policy, which guarantees protection against retaliation. In cases where Vestas is found to be linked to or contributing to adverse impacts on supply chain workers, the company uses its leverage to promote effective remediation and closely monitors the resolution process.

Consultation with Owned and Controlled Entities

In preparing this statement, Vestas Australia engaged with various business functions across the country to gain a deeper understanding of how modern slavery risks are addressed within its operations. The development of this statement was further supported by the CSR and Sustainable Procurement teams, ensuring alignment with global standards and practices.

Continuous Actions to Support Responsibility

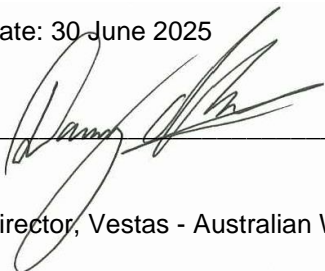
Vestas recognises its responsibility to respect human rights, which includes ensuring that its operations do not cause or contribute to modern slavery or human trafficking.

To further mitigate the risks of forced and child labour in its supply chain, Vestas has launched an initiative to map the presence of EU Critical Raw Materials within turbine components. By mid-2025, this initiative will provide a comprehensive overview of which components contain these minerals, enabling greater transparency across Vestas' value chain.

Vestas Australia remains committed to enhancing transparency in its operations and supply chains by strengthening its policies, procedures, and stakeholder engagement. Vestas Australia acknowledges that this is an ongoing journey and will report on progress in its 2025 Modern Slavery Statement.

This statement was approved by the Board of Directors of Vestas - Australian Wind Technology Pty Limited:

Date: 30 June 2025

A handwritten signature in black ink, appearing to be 'Dany', is written over a horizontal line. The signature is stylized with a large loop and a long horizontal stroke.

Director, Vestas - Australian Wind Technology Pty Limited