

Vestas – Australian Wind Technology Pty Limited

Modern Slavery Statement for reporting year 1 January – 31 December 2025

About This Statement

Scope and Purpose

This is the annual Modern Slavery Statement published by Vestas – Australian Wind Technology Pty Limited (ACN 089 653 878) (**Vestas Australia**) pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) (**Act**). This statement is provided by Vestas Australia, a 'reporting entity' under s 5 (1)(a)(i) of the Act.

This statement has been prepared in accordance with the mandatory reporting criteria outlined in section 16 of the Act. It is also informed by international guidelines, including the United Nations Guiding Principles on Business and Human Rights, and underscores Vestas' commitment to respecting human rights across its global and Australian operations.

Structure, Operations and Supply Chains

Global Structure and Operations

Vestas Wind Systems A/S (**Vestas**), being Vestas Australia's parent company, designs, manufactures, installs and services wind turbines worldwide.

Vestas is headquartered in Denmark and has offices globally with more than 36,000 employees. Vestas operates across five commercial regions: Mediterranean, Latin America, North America, Northern and Central Europe and Asia Pacific. Vestas has manufacturing, assembly and research and development facilities in 10 countries and has installed wind turbines on- and offshore in over 88 countries. In the year 2025, Vestas' revenue amounted to EUR 18.8 billion.

Vestas is structured into six Executive Vice President areas: Finance, Sales, Service, Technology & Operations, People & Culture and Development & Digital Solutions. For further information you can visit www.vestas.com.

Australian Structure and Operations

Vestas Australia is a wholly owned subsidiary of Vestas and operates as part of the Asia Pacific division within the global Vestas group. Vestas Australia's principal activities include the sale, installation and servicing of wind turbines and related infrastructure across the Australian market.

As at 31 December 2025, Vestas Australia comprised of approximately 796 employees across Australia and had revenue of approximately AUD 2.2 billion between 1 January to 31 December 2025. Vestas Australia also engages contractors and subcontractors for wind farm construction, commissioning and servicing activities.

Supply Chains

Vestas engages with suppliers around the world. Vestas classifies its suppliers 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; and

- **service scope** - Suppliers that support Vestas' service operations.

Supplier expenditure predominantly falls within the following spend categories:

- Direct procurement, covering core components such as blades, nacelles, towers, steel, hubs, electrical systems and powertrain elements.
- Indirect procurement, encompassing supporting goods and services including transport, construction, IT and business services, as well as tools, capital expenditure (CAPEX), and maintenance, repair and operations (MRO).
- Service procurement, which includes both service materials and broader service solutions.

In relation to Australian operations specifically, Vestas Australia's supply chain includes:

- **Imported components:** Wind turbine components (including blades, nacelles, towers and electrical systems) manufactured at Vestas facilities and by suppliers in and shipped to Australian project sites.
- **Domestic suppliers:** Australian-based suppliers of construction services, transport and logistics, civil works, electrical installation and site maintenance.
- **Contracted services:** Third-party providers at Australian offices and project sites.

Risks of Modern Slavery Practices in Operations and Supply Chains

Risks in Operations

The recruitment of factory workers at Vestas is now fully led by the Global Talent Acquisition (TA) team, which has implemented a standardized, global recruitment process. Throughout 2023 and 2024, Vestas focused on establishing a unified global framework for selecting and managing recruitment suppliers for factory positions. As part of this effort,

factories have been gradually integrated into the formal recruitment process, which is now managed centrally by the TA team.

Several factories rely heavily on temporary workers to accommodate fluctuations in manufacturing demand. To support this, these factories now operate under Master Supply Agreements or local agreements designed to streamline and govern the use of recruitment providers at each site globally. This mapping exercise, initiated in 2021, enabled Vestas to begin reducing the number of recruitment partners and to ensure consistent alignment with global procurement practices. This includes compliance with contracting requirements and adherence to Vestas' Supplier Code of Conduct.

Vestas Australia has identified the following operational risks relevant to modern slavery:

- **Labour hire and temporary workers:** Wind farm construction and servicing activities in Australia involve the engagement of subcontractors and labour hire providers, who may in turn engage temporary, casual, or migrant workers. These arrangements can create risks of exploitation if adequate oversight and due diligence are not maintained.
- **Remote and regional work locations:** Wind farm projects are frequently located in remote or regional areas, where workers may be housed in employer-provided accommodation and may have limited access to support services, grievance mechanisms, or alternative employment, creating conditions that may heighten vulnerability to modern slavery practices.

Risks in Supply Chains

Vestas operates within a global 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 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.

Vestas Australia's upstream and downstream supply chains carry risks:

- **Upstream supply chain risks:**
Components may be sourced from manufacturing facilities in countries with higher prevalence of forced labour, child labour, or poor labour protections present inherent modern slavery risks. This includes risks associated with the extraction and processing of raw materials, including conflict minerals such as tin, tantalum, tungsten and gold (3TGs) and critical raw materials including rare earth elements.
- **Downstream supply chain risks:**
Subcontractors engaged for construction, installation and servicing of wind farms in Australia may operate through multi-layered subcontracting arrangements, which can reduce visibility over labour conditions. Contracted service providers at Australian sites also present potential risks, particularly where low-skilled or migrant workers are employed.

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 and during, Vestas continued implementing the CW-HRA's recommendations.

For the supply chain, the adverse human rights risks are generally managed through our standard due diligence processes. We have, however, prioritized child and forced labour and conflict affected areas with additional initiatives due to the severity of the impacts. Vestas can be seen as linked to some of the adverse impacts taking place in our upstream value chain, although we rarely contribute to them. However, due to their salience we strive to explore ways to use our leverage.

Actions Taken to Assess and Address Risks

Policy Framework

Codes of Conduct

Vestas operates according to its Codes of Conduct, which are a set of rules and principles that outline expectations towards employees and suppliers. Vestas has both an Employee Code of Conduct and a Supplier Code of Conduct.

Vestas is committed to the United Nations Guiding Principles on Business and Human Rights and is guided by the OECD Guidelines for Multinational Enterprises on responsible business conduct. Vestas respects all internationally recognised human rights, including the Universal Declaration of Human Rights and the International Labour Organization Declaration of Fundamental Principles and Rights at Work. Both Vestas Codes specifically prohibit the use of modern slavery or human trafficking within Vestas' global business.

The Supplier Code of Conduct outlines Vestas' expectations of suppliers in four main areas: Human Rights and Labour Rights, Working with Integrity, Respecting the Environment and Fair Business Practices. The Code is an integrated part of purchase agreements and applicable to all suppliers. In addition to suppliers' own workers, Vestas also requests its suppliers to take diligent and reasonable

steps to prevent human and labour rights violations within their own supply chains. If a supplier does not follow the Supplier Code of Conduct, Vestas reserves the right to take necessary actions to mitigate risk and the relationship with the supplier may be terminated.

These Codes apply equally to Vestas Australia's operations and supply chains in Australia. Both Codes of Conduct can be found at www.vestas.com.

Human Rights Policy

In accordance with the UNGPs, Vestas' Human Rights Policy publicly conveys Vestas' commitment to respecting human rights, to avoid infringing on human rights and to address any adverse human rights impacts Vestas may be involved in.

The Human Rights Policy specifically states Vestas' commitment to avoid using or contributing to forced or compulsory labour. The Policy is signed by Vestas' Chairman and is distributed group-wide and communicated publicly at www.vestas.com.

Conflict Minerals Policy

Vestas maintains a separate policy on conflict minerals, reflecting its commitment to responsible sourcing practices aligned with the OECD Due Diligence Guidance. Vestas engages with suppliers through its Conflict Minerals Programme to ensure that minerals and metals, particularly tin, tantalum, tungsten and gold (3TGs), sourced for its products do not originate from conflict-affected or high-risk areas.

This policy applies to all eligible direct suppliers and risks associated with value chain workers are mitigated by leveraging influence and requiring suppliers to conduct additional due diligence in their supply chains upon identifying any risks. The policy, signed by the GSVP, Global Procurement, is available www.vestas.com.

Due Diligence Processes

Supplier Due Diligence Framework

Vestas applies a supplier due diligence framework that covers both direct and indirect suppliers with whom it maintains contractual relationships. This framework is designed to identify and address potential adverse impacts and risks within the supply chain.

As part of onboarding, new suppliers are screened for sanctions and business ethics risks, followed by completing a Supplier Registration Questionnaire that includes an explicit commitment to the Vestas Supplier Code of Conduct. This commitment is required to proceed with the Supplier Business Assessment (SBA), which is tailored to the supplier's scope of supply.

For indirect suppliers, Vestas applies a risk matrix that considers onboarding questionnaire results and global risk intelligence criteria to determine which suppliers require onsite assessments. Direct suppliers undergo onsite assessments as a standard procedure. These assessments involve reviewing relevant policies, procedures and management systems related to human and labour rights to identify potential risks. Corrective action plans are developed for identified areas of improvement.

Existing suppliers are monitored on an ongoing basis to ensure that standards are upheld, including ad hoc assessments based on substantiated knowledge, media coverage, or other credible sources. While Vestas works collaboratively with suppliers to improve performance, it is prepared to terminate relationships if material concerns persist.

The Supplier Due Diligence framework is currently undergoing revision. Vestas plans to begin introducing the new Supplier Lifecycle Management Framework in 2026.

Conflict Minerals Programme

Vestas has implemented a Conflict Minerals Programme (CMP) to mitigate the risks of adverse human rights impacts associated with raw material extraction, including forced and child labour.

In 2025, Vestas completed the fifth iteration of suppliers engaged in the CMP, engaging 104 suppliers. Vestas focuses on suppliers whose products may contain 3TGs and risks are identified based on information provided through the Conflict Minerals Reporting Template. The supplier response rate for 2025 was 93 per cent.

Additionally, in 2025 we participated in an annual smelter outreach initiative facilitated by the third-party supply chain data management platform, encouraging non-conformant smelters to engage with the Responsible Minerals Assurance Process through an independent audit. We continue committed to upholding the responsible sourcing principles outlined in our Conflict Minerals Policy and the Supplier Code of Conduct.

EU Critical Raw Materials Mapping

In 2025, Vestas also finalised a cross-collaborative initiative to map the minerals covered in the EU Critical Raw Materials Act, including conflict minerals and rare earth elements, across its components.

This mapping formed the basis for expanding the CMP to include additional materials, with the aim of ensuring suppliers use conformant smelters and thereby mitigating risks of adverse human rights impacts in the supply chain.

Recruitment and Labour Practices

Vestas has established a comprehensive recruitment policy that adheres to the principles of consistency, global alignment and compliance with applicable laws, applying uniformly to all employees regardless of their employment status.

Recruitment is managed by the Vestas Recruitment Team, part of the People & Culture function, guided by a Global Recruitment Process. Vestas outsources a significant portion of the recruitment process to a global recruitment partner, which is required to comply with Vestas' Recruitment Framework and Supplier Code of Conduct. Regional Recruitment Managers oversee the implementation of the Global Recruitment Process across all regions.

Wind Energy Initiative and EcoVadis Implementation

In 2024, Vestas joined the Wind Energy Initiative, a multistakeholder collaborative effort between EcoVadis, WindEurope, other OEMs and customers, aimed at enhancing supply chain transparency and improving performance standards across ESG topics. As part of this commitment, we have adopted a more structured approach to engage suppliers through EcoVadis assessments.

In 2025, Vestas hosted a series of supplier-focused webinars under the Wind Energy Initiative, with plans to continue in 2026.

Grievance Mechanisms and Remediation

EthicsLine is Vestas' whistleblower system and main mechanism for identifying, reporting and investigating concerns, promptly, independently and objectively. It accommodates both internal and external stakeholders and allows employees and business partners to report suspected violations of the Vestas Code of Conduct, applicable laws and Vestas' policies. Hosted on a secure external platform, it ensures anonymity and protection from retaliation. The platform is accessible publicly on Vestas' corporate website, the Vestas Compliance app and the intranet.

In 2025, 922 EthicsLine cases were raised, with 175 substantiated and 575 cases unsubstantiated. The remainder were still under investigation at the end of the year. Additionally, 111 of the substantiated cases were related to social or human rights areas, including termination of employment.

In addition to requiring suppliers to establish their own grievance mechanisms, the Vestas Supplier Code of Conduct specifies that EthicsLine is also available to suppliers and supply chain workers to raise concerns anonymously.

In 2025, 11 concerns related to suppliers and/or supply chain workers were reported to EthicsLine. The cases were handled in close collaboration with the suppliers and three cases were substantiated.

EthicsLine is available to all workers engaged in or connected with Vestas Australia's operations and supply chains.

Assessing the Effectiveness of Actions

Vestas Australia assesses the effectiveness of the actions it has taken to assess and address modern slavery risks through the following measures:

Quantitative Indicators

In 2025, Vestas conducted 2,164 due diligence screenings of potential suppliers prior to the supplier onboarding process (2024: 2,110).

Vestas conducted 180 onsite supplier assessments for both direct and indirect suppliers (2024: 141). Of these, 148 suppliers scored above 70, meeting Vestas' acceptable risk threshold. For the 32 suppliers that scored below 70 per cent, corrective action plans were developed and agreed upon by Vestas and the supplier. Of these, five suppliers were rejected.

The supplier response rate for the Conflict Minerals Programme in 2025 was 93 per cent. 922 EthicsLine cases were raised in 2025, with 175 substantiated. 111 of the substantiated cases were related to social or human rights areas.

Qualitative Indicators

- Review and continuous improvement of the Supplier Code of Conduct and due diligence framework.
- Revision of the Supplier Due Diligence framework and planned introduction of the new Supplier Lifecycle Management Framework in 2026.
- Participation in the Wind Energy Initiative and use of EcoVadis assessments to benchmark supplier performance on ESG topics.
- In 2025, a new initiative was launched requesting selected suppliers to disclose their most recent third-party sustainability rating to complement Vestas' internal assessments and support transparency across the value chain.

Plans for Strengthening Effectiveness Assessment

Vestas has not yet set specific targets related to workers in its value chain but plans to do so as part of the Supplier Lifecycle Management Framework, to start integration in 2026. Vestas will explore options for establishing specific targets and for measuring the effectiveness of its policies and actions through enhanced data collection.

Consultation

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.

Other Relevant Information

Forward-Looking Commitments

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 forced labour and child labour risks in its supply chain, Vestas is expanding its CMP by engaging more closely with suppliers whose products contain additional critical raw materials. This work will strengthen transparency and oversight across the value chain. In 2026, Vestas plans to begin introducing its revised Supplier Due Diligence Framework to continue to support a structured and consistent approach to risk identification and mitigation, ensuring alignment with its broader sustainability and governance priorities.

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 2026 Modern Slavery Statement.

This Modern Slavery Statement was approved by the Board of Directors of Vestas - Australian Wind Technology Pty Limited.

Date: 25 June 2026

A handwritten signature in black ink, appearing to read "Danny Nielsen", written over a horizontal line.

Danny Nielsen

Director -Vestas – Australian Wind Technology Pty Limited