

Siemens Gamesa Renewable Energy Pty Ltd

ACN 614 784 575

Modern Slavery Statement
for the Reporting Period to 30 September 2025



1. Reporting Entity

This Modern Slavery Statement is made in accordance with the requirements of the *Modern Slavery Act 2018* (Cth) by Siemens Gamesa Renewable Energy Pty Ltd ACN 614 784 575 with its registered office at Botanicca 3 - Level 3, West Tower, 570 Swan Street, Burnley Victoria 3121, Australia. The statement covers the reporting period for the financial year ended 30 September 2025.

Siemens Gamesa Renewable Energy Pty Ltd is a large proprietary company which is part of the Siemens Energy group of companies ultimately owned by Siemens Energy AG (referred to in this document as “**Siemens Energy**” or the “**Siemens Energy Group**”). The Wind Power business operated globally within the Siemens Energy Group is referred to in this document as “**Siemens Gamesa**”.

2. Structure, Operations and Supply Chain

Structure

Siemens Energy AG is the ultimate owner of Siemens Gamesa Renewable Energy Pty Ltd which is headquartered in Melbourne, Australia and does not own or control other entities.

The Siemens Energy Group is a globally active energy technology company with operations in over 90 countries. Its business model is structured around four Business Areas of which the Wind Power business Siemens Gamesa (**Siemens Gamesa**) is one.

The Siemens Gamesa business delivers technologies and services for onshore and offshore wind.

Siemens Gamesa Renewable Energy Pty Ltd carries on business in Australia and in New Zealand and during the reporting period also carried on business in Singapore.

As of September 30, 2025, the Siemens Energy Group employed 102,985 employees¹. Locally, Siemens Gamesa Renewable Energy Pty Ltd employed 114 staff.

The Siemens Energy Group currently maintains, protects, and owns a large number of trademarks. Most products and services sold by Siemens Gamesa use the trademark Siemens Gamesa or Siemens Energy (under licence from Siemens AG).

Operations

The Siemens Energy Group aims to create sustainable value through its global presence, cross-business synergies, both within and across Business Areas, and investments in research and development. Strategic partnerships and innovation ecosystems complement internal capabilities and help accelerate the deployment of new technologies. Our governance framework is designed to ensure transparency, accountability, and compliance with relevant legal and regulatory requirements. Through stakeholder engagement, we aim to contribute constructively to the development of energy policy and regulatory frameworks.

Siemens Energy's long-term business model involves extended investment cycles, multi-year project timelines, and at times decades-long service agreements. This structure influences workforce planning, requiring a stable, highly skilled, and globally distributed employee base.

The **Wind Power business Siemens Gamesa** focuses on the design, development, manufacturing and installation of products, as well as on the provision of technologically advanced services in the renewable energy sector. With a focus on onshore and offshore wind turbines for various wind conditions, Siemens Gamesa plays a key role in the global transition to renewable energy. Siemens Gamesa creates value through the execution of wind farm projects and long-term operations and maintenance contracts. Its value proposition includes high-efficiency turbine technology, digital performance tools, and predictive analytics that maximize energy output and minimize downtime. Siemens Gamesa also offers lifecycle services such as logistics, grid integration, and remote diagnostics.

Siemens Gamesa's customer base includes primarily large utilities and independent power producers, as well as renewable energy project developers and entities involved in the development of onshore and offshore wind projects. The Business Area also engages with stakeholders involved in permitting, grid connection, and lifecycle asset management.

Supply Chain

The Siemens Energy Group relies on a multi-tier global supplier network for the provision of production materials, components, capital goods, and services. These include electrical, mechanical, and structural elements, as well as renewable energy and power generation equipment. The supply chain starts with suppliers providing key raw materials, including metals and minerals such as copper, aluminium, and steel. These raw materials undergo

¹ Siemens Energy AG Annual Report 2025 Combined Management Report, page 48

transformation and treatment in the value chain followed by further processing into fabricated components which are then procured by the Siemens Energy Group. In addition to direct, production-related procurement, the Group also sources goods and services that support operational efficiency but are not directly tied to end products, including logistics and professional services.

Siemens Gamesa sources a wide range of specialized components required for the design and manufacturing of onshore and offshore wind turbines. Siemens Gamesa predominantly sources precision-engineered components to assemble nacelles, manufacture blades and install towers. These components mainly consist of steel, iron, copper, aluminium, fibres and resins. Logistics partners facilitate the transport of oversized components to global project sites, often under complex regulatory and environmental conditions.

Siemens Gamesa Renewable Energy Pty Ltd

Locally, Siemens Gamesa Renewable Energy Pty Ltd does not have manufacturing facilities in Australia. Logistics requirements are outsourced to third parties.

The products Siemens Gamesa Renewable Energy Pty Ltd sells are sourced from all over the globe from Siemens Energy Group's factories and third party vendors.

The services that we provide include the supply of labour that is sourced mainly in Australia, although some specialist engineers are sourced from Siemens Energy Group Companies worldwide and from other suppliers.

Depending on the nature of the supply of products and services, Siemens Gamesa Renewable Energy Pty Ltd may have different contractual relationships with suppliers. These may vary from single transactions to multi-year relationships. Contractual arrangements will be different depending on the circumstances, and include purchase orders, master procurement agreements, framework agreements (local and global) and subcontracts.

Siemens Gamesa Renewable Energy Pty Ltd's business relationships include customer product, solution and service contracts, as well as consortium agreements from time to time with third parties (which allocate the scope of supply under a customer contract).

3. Risks of Modern Slavery Practices in the Operations and Supply Chains

Operational risks of modern slavery practices identified by Siemens Gamesa Renewable Energy Pty Ltd engagement of labour on construction sites.

Supply risks of modern slavery practices identified by Siemens Gamesa Renewable Energy Pty Ltd continue to include:

- Forced and compulsory labour and child labour.
- Health and safety risks to our suppliers' workers;
- Sourcing of uniforms and personal protective equipment (PPE), as the manufacturing process has been susceptible to modern slavery in the past.

The Siemens Energy Group has identified that the most significant areas of concern are associated with the sourcing of raw materials in its supply chain, where limited oversight or subcontracting practices may result in labour rights violations².

- Workers involved in raw material extraction and processing may be exposed to hazardous working conditions, limited labour rights, and discriminatory practices.
- Transport workers may face excessive working hours, low wages, and insufficient protection against exploitation. In the manufacturing sector - especially among subcontractors - unsafe working conditions and restricted labour rights may also be present.

Siemens Energy acknowledges the risk of child and forced labour in the upstream value chain, particularly in the mining sector. This risk is especially relevant in the sourcing of critical raw materials such as cobalt, copper, gold, tin, tantalum, tungsten, mica, and rare earth elements. These materials are often sourced from high-risk regions with significant labour rights and other human rights issues, particularly in Asia and Africa where labour rights concerns are widespread.³

4. Actions taken to assess and address these risks, including due diligence and remediation processes.

The Siemens Energy Group is committed to upholding responsible labour standards and promoting ethical sourcing practices throughout its global value chain. These principles are embedded in the Siemens Energy Group's strategy and are designed to identify, prevent, and mitigate negative impacts on workers, with a particular focus on upstream value chain segments. In the downstream value chain, Siemens Energy primarily works with large, reputable utility and infrastructure companies that themselves place high requirements on their suppliers.

Sustainability criteria are systematically integrated into supplier selection, evaluation, and development processes. These criteria are designed to identify, prevent,

² Ibid, page 123 and 124

³ Ibid page 124

and mitigate potential negative impacts on workers in the value chain. Suppliers are centrally approved by the Siemens Gamesa Account Master Data (AMD) team.

Insights derived from supply chain analysis are continuously incorporated into the refinement of our procurement strategy. For example, information on working conditions may lead to adjustments or even termination of supplier contracts, as well as changes in sourcing strategies.

To address the risks of child and forced labour in the mining sector, Siemens Energy engages in several multi-stakeholder initiatives:

- OECD Responsible Minerals Multi-Stakeholder Steering Group
- Responsible Minerals Initiative
- European Partnership for Responsible Minerals
- Global Battery Alliance
- Copper Mark Assurance Framework

These initiatives support the identification of systemic risks, promote responsible sourcing practices, and enhance transparency in mineral supply chains. Through our active involvement, we gain a better understanding of how workers, particularly those with certain characteristics or working in certain contexts, may be at higher risk of negative impacts.

Siemens Energy applies the Responsible Minerals Assurance Process to assess smelters and refiners. Results from these assessments are incorporated into procurement decisions.

While systemic impacts have not been identified in our value chain, specific incidents - such as industrial accidents - can have significant local consequences.

Health and safety remain a key concern, particularly in high-risk sectors such as mining and heavy industry. People in mining communities are especially vulnerable. They may be subject to exploitation, exposed to hazardous substances, and have limited access to education and healthcare. Siemens Energy's due diligence processes are designed to identify and mitigate such risks, guided by international human rights standards and its Code of Conduct.

Policies

The Siemens Energy Group has actions and policies in place to support the identification, assessment and mitigation of modern slavery risks in alignment with the definitions of modern slavery under the *Modern Slavery Act 2018* (Cth).

No significant changes were made to these policies during the reporting year. However, they are regularly reviewed and adapted as necessary in response to changing circumstances or regulatory requirements.

All employees have access to current policies and procedures via a global digital platform. Regular communications ensure that employees are informed of any updates.

Business Conduct Guidelines

Siemens Energy's approach to responsible business conduct is governed by the Siemens Gamesa Business Conduct Guidelines (BCG) which is identical in content to the Siemens Energy BCG. These guidelines establish an ethical and legal framework for all business activities. They set out fundamental principles and rules for conduct, both for interaction within the Company and for interactions with external stakeholders, covering key areas such as human rights, labour standards, anti-corruption, anti-bribery, antitrust as well as whistleblower channels and protection.

The BCG rules, available on the Siemens Energy website, are mandatory for all employees and have been aligned with and approved by the General Works Council. To enforce the BCG commitment employees are trained in the respective requirements of the BCG and are requested to acknowledge them as part of their conditions for employment.

Suppliers

Siemens Energy is committed to working with suppliers that uphold responsible business practices and comply with all applicable laws and internationally recognized environmental, social, and governance standards. This commitment is embedded in our procurement strategy and implemented through a set of binding policy instruments, including our:

- Code of Conduct for Suppliers and Third Party Intermediaries
- Respect for Human Rights and Environmental Protection Policy Statement
- Responsible Minerals Sourcing Policy and
- Environment, Health and Safety (EHS) Policy

These policies form the foundation for supplier engagement and due diligence processes. Suppliers are required to acknowledge and implement the Code of Conduct as a condition of doing business with Siemens Energy.

Code of Conduct for Suppliers and Third-party Intermediaries

The Siemens Gamesa Renewable Energy Code of Conduct for Suppliers and Third-party Intermediaries

(Code of Conduct), which are identical in content to the Siemens Energy Code of Conduct, sets binding expectations for sustainability performance in all countries in which Siemens Energy operates. It defines the fundamental responsibilities of suppliers toward their stakeholders and the environment and underscores Siemens Energy's commitment to ethical and sustainable business practices.

The Code of Conduct covers a broad range of human rights and labour standards, including:

- Ensuring adequate wages and fair working conditions
- Prohibition of child labour, forced labour or compulsory labour trafficking in human beings
- Promotion of gender equality and equal pay for work of equal value
- Respect for freedom of association and the right to collective bargaining
- Inclusion of people with disabilities and promotion of workforce diversity

Our business partners and suppliers are required to comply with the Code of Conduct. The Siemens Energy Group Head of Procurement and the Group Compliance Officer jointly oversee the implementation of the Code of Conduct.

We support international organizations that promote and strengthen responsible business practices. Therefore, the Code of Conduct is based on the Business Conduct Guidelines (BCG), reflects the ten principles of the UN Global Compact and is grounded in our commitment to the following conventions:

- Universal Declaration of Human Rights
- International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- Rio Declaration on Environment and Development

This approach supports Siemens Energy's overarching objective of ensuring that its upstream value chain contributes positively to sustainable development and does not cause or contribute to negative impacts on people or the environment.

Respect for Human Rights and Environmental Protection Policy Statement

The Respect for Human Rights and Environmental Protection Policy Statement outlines Siemens Energy's human rights commitments with respect to workers in the value chain. Together with the Code of Conduct and BCGs, it forms the foundation of the Company's responsible business conduct framework.

As part of its human rights due diligence, Siemens Energy contractually obliges its suppliers to comply with internationally recognized human rights and environmental

standards. Suppliers are contractually required to implement corrective actions when violations are identified.

Responsible Minerals Sourcing Policy

The Responsible Minerals Sourcing Policy is designed to prevent the use of minerals from conflict-affected and high-risk areas that are associated with severe human rights violations and environmental harm. It is aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and specifically addresses the risks outlined in Annex II of the Guidance. These include forced labour, child labour, human trafficking, and other forms of exploitation.

The policy is binding for all Siemens Energy employees involved in procurement activities and is integrated into supplier onboarding and contract management. Suppliers are required to comply with this policy as part of their contractual obligations under the Code of Conduct.

Responsibility for implementation lies with the Siemens Energy Group Head of Procurement, who ensures that supply chain due diligence processes are embedded across the Company.

Environment, Health and Safety Policy

At Siemens Energy, the health, safety, and well-being of our own workforce are core values and an integral part of our risk management and internal control systems. Our commitment is anchored in our BCG and operationalized through our EHS Policy. The scope of the EHS Policy covers own workforce (employees and non-employees) as well as contractors (value chain workers). These efforts directly support our contributions to the two UN SDGs SDG 3 "Good Health and Well-Being" and SDG 8 "Decent Work and Economic Growth".

The EHS Policy emphasizes our commitment to:

- identifying, assessing, and managing hazards and risks
- empowering employees to speak up and intervene in unsafe situations
- preventing injuries and ill health through incident reporting, investigation, and corrective action
- promoting physical and mental well-being
- ensuring safe and healthy working environments
- protecting the environment and using natural resources efficiently

The Zero Harm Framework further operationalizes these goals through principles, behaviours, essentials, and building blocks

The Code of Conduct, Respect for Human Rights and Environmental Protection Policy Statement, Responsible Minerals Sourcing Policy, and EHS Policy are available on the Siemens Energy website www.siemens-energy.com.

Sustainability Audits⁴

External sustainability audits are conducted by internationally recognized firms and include direct interviews with supply chain workers, including those from vulnerable groups, to gather insights into working conditions.

They are prioritized based on supplier risk profiles and include assessments of labour practices, occupational health and safety, and compliance with human rights standards. Operational responsibility lies with the Head of Procurement, supported by the Legal & Compliance function as needed to ensure compliance with applicable labour laws and international frameworks.

In addition, Siemens Energy endorsed 979 further external sustainability audits or equivalent assessments that were initiated by our suppliers and later validated.

Common issues identified through these audits include:

- Inadequate occupational health and safety measures
- Lack of documented grievance mechanisms to protect workers
- Insufficient monitoring of working conditions, particularly in subcontracting arrangements

The implementation of corrective actions is monitored by the Procurement and Compliance functions through a structured follow-up process. These audits are complemented by:

- Supplier sustainability self-assessments
- Quality audits with integrated sustainability questions
- Due diligence assessments for responsible minerals sourcing with relevant direct suppliers
- Smelter assessments via RMI

Sustainability Self-Assessments

Suppliers with an annual order volume exceeding €10,000 are required to complete a self-assessment before receiving "Ready-for-Business" status. These self-assessments cover all key elements of the Code of Conduct and are updated regularly.

New suppliers need to meet the qualification criteria, and existing suppliers are re-evaluated every three years. If responses are insufficient or do not meet requirements, suppliers must take corrective actions - otherwise, cooperation will be refused.

Further commitments

The Siemens Energy Group supports international organizations that promote and strengthen responsible business conduct. Our efforts go beyond compliance with applicable laws and regulations, as they are based on our commitment to the following conventions and principles and reflected in our business conduct policies and corporate culture:

- United Nations Convention against Corruption
- Anti-Bribery Convention of the OECD
- 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
- European Convention on Human Rights
- International Labour Organization (ILO) Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy
- ILO Declaration on Fundamental Principles and Rights at Work, in particular on the following topics: elimination of child labour, abolition of forced labour, prohibition of discrimination, freedom of association, the right to collective bargaining, and fundamental freedoms
- UN Sustainable Development Goals (SDG), specifically SDG 8 "Decent Work and Economic Growth," which we have defined as one of our priority SDGs
- United Nations Guiding Principles on Business and Human Rights (UNGP)
- OECD Guidelines for Multinational Enterprises
- Principles of the United Nations Global Compact (UNGC), to which we are a signatory
- Global Framework Agreement (GFA) on fundamental rights of workers

While Siemens Energy remains dedicated to promoting ethical business conduct, instances of violations may occur. When such violations are identified, we take prompt action to address the situation and mitigate its impacts. Remedial measures are implemented on a case-by-case basis. We consider the interests of affected individuals and, where feasible, incorporate their perspectives into the resolution process. Where useful, we also engage with stakeholders and industry trade organizations

Protection of whistleblowers

Siemens Energy provides confidential and anonymous reporting channels for employees and any third party to report potential compliance violations. These include concerns related to anti-corruption and anti-bribery, anti-money laundering, antitrust, collective action, data privacy, export control, and human rights. The purpose of these channels is to identify misconduct, protect whistleblowers, and safeguard Siemens Energy from potential harm.

⁴ Ibid 126

The reporting options are available in multiple languages via the global Siemens Energy website and telephone and are promoted internally through the intranet and compliance training programs, including the BCG training.

As outlined in our BCG, we do not tolerate retaliation against complainants or whistleblowers; any breach of this prohibition will be punished as a compliance violation. The compliance organization is the designated recipient of reports submitted through the reporting channels. It is responsible for processing and, if necessary, further investigating the information received, in accordance with applicable local laws.

Reporting channels are:

- "Speak Up" whistleblower channel
- Ombudsperson
- Within the European Union: Local representatives
- Compliance organization: Group Compliance Officer, compliance officers and any other compliance employee
- Any other Company representative or manager

Implementation in Australia

The Siemens Energy Group policies, processes and systems are implemented by Siemens Energy Pty Ltd.

The risk of modern slavery is also addressed during the employee onboarding process which includes background checks such as right to work in Australia, age verification and qualifications for the relevant tasks prior to undertaking work on behalf of Siemens Energy Pty Ltd. A global external partner is engaged to provide technical advice and support on visas for international personnel entering countries in which we operate. This assists to verify that they are being treated fairly and safely both by their overseas employers and by Siemens Energy Pty Ltd while working on our projects.

5. How we assess the Effectiveness of these Actions

Compliance with policies is monitored through training, risk-based assessments, audits, and corrective action plans, particularly in regions or sectors with elevated sustainability risks.

The Siemens Energy Group has a goal to further strengthen the management of high-risk suppliers and monitor progress towards that goal.

The key metric used for measuring target achievement is the "Managed High Risk Supplier Coverage Rate", which is a measure of the proportion of managed risks in the total supplier population.

This metric relies on Sustainability Risk Scores as an input, the risk scores considering specific risk factors including child labour, forced labour, remuneration, safety, discrimination, social dialogue / collective bargaining, land rights, environmental pollution, environmental regulation, and the use of security forces. These risk factors collectively determine the overall risk score, or risk profile, of each supplier.

The Managed High Risk Supplier Coverage Rate target is monitored at Siemens Energy Group level and supported by external auditing partners to establish transparency and accountability in execution. These measures are part of our broader strategy to embed responsible business practices throughout our global supply chain.

Siemens Energy Pty Ltd assesses implementation of Siemens Energy Group policies and processes through its Risk and Internal Control program and by local function heads in Procurement, Legal & Compliance and Human Resources.

6. Process of Consultation with any entities the reporting entity owns or controls

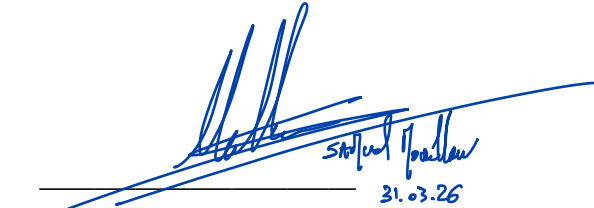
Siemens Gamesa Renewable Energy Pty Ltd is part of the Siemens Energy Group and does not have any companies that it owns or controls.

7. Any Other Relevant Information

This statement is aligned with the Group Sustainability Statement contained in the Combined Management of the Siemens Energy Annual Report 2025

Further detail is available at www.siemens-energy.com and in particular the sections: [Compliance and Sustainability at Siemens Energy](#)

**Signed in accordance with a resolution of the Board of Directors
Siemens Energy Pty Ltd (ACN 636 537 409)**



Samuel Morillon

Managing Director and CEO

Dirk
Janssen

Digitally signed by Dirk Janssen
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Dirk Janssen

Director and CFO