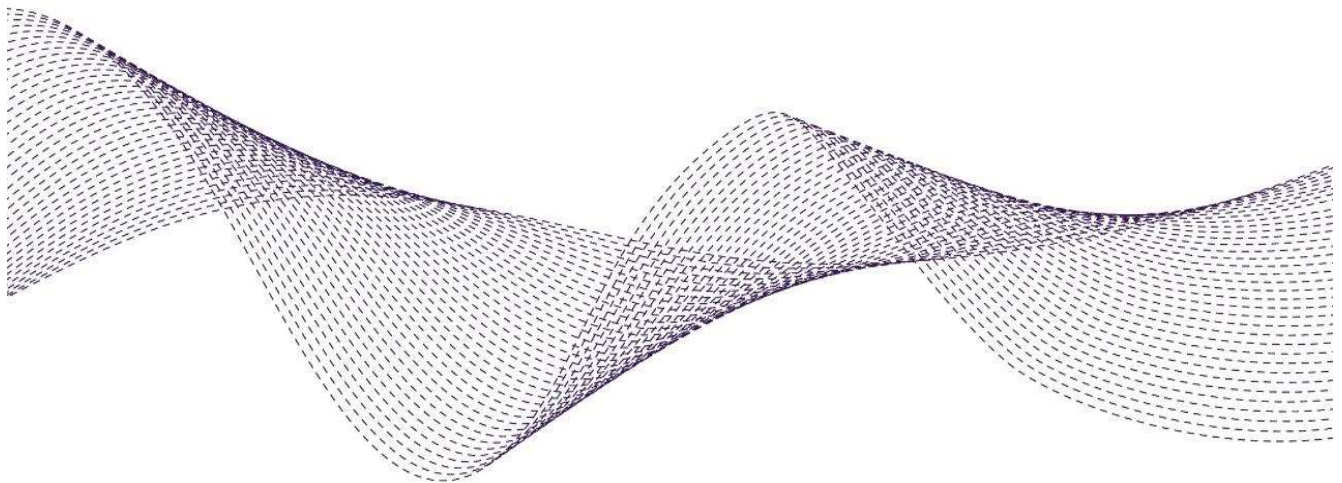


Siemens Gamesa Renewable Energy Pty Ltd  
(ACN 614 784 575)

## **Modern Slavery Act Statement**

for the reporting period to 30 September 2023



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# 1. Reporting Entity

This Modern Slavery Statement has been prepared pursuant to section 13 of the Modern Slavery Act 2018 (Cth) (“Modern Slavery Act”) by Siemens Gamesa Renewable Energy Pty Ltd 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 2023 (“FY23”).

Siemens Gamesa Renewable Energy Pty Ltd (ACN 614 784 575) (“SGRE AU”):

- i) is a large proprietary company in Australia (headquartered in Melbourne, Victoria) with two (2) controlled entities, being a branch in Singapore and New Zealand; and
- ii) directly employs 127 people as of 1 October 2023.

Sustainability is a critical of our company’s strategy. Th United Nations Sustainable Development Goals (“SDGs”) guide us in our ambition to be a sustainability leader, the relevant SDGs for the purposes of this report are as follows:

 <p><b>5 GENDER EQUALITY</b></p> <p><b>SDG5:</b> Achieve gender equality and empower all women and girls</p> <p>Our main impact on SDG 5 is by managing our own workforce. Siemens Gamesa recognizes that employees represent a large variety of cultures, ethnicities, beliefs and languages.</p>	 <p><b>8 DECENT WORK AND ECONOMIC GROWTH</b></p> <p><b>SDG8:</b> Promote sustained, inclusive and sustainable economic growth, full and productive employment and</p> <p>decent work for all. Siemens Gamesa directly impacts SDG 8 through its global operations contributing to GDP development in many countries, our commitment to providing decent jobs and enabling employment and by driving the decoupling of economic growth from energy usage as a thought leader.</p>
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Our sustainability processes and commitments are reflected in Siemens Gamesa’s Sustainability Policy dated 16 September 2021<sup>1</sup>. Without limitation, we are committed to the:

- International Bill of Human Rights
- European Convention on Human Rights
- International Labour Organisation (ILO) Tripartite Declaration of Principles - concerning Multinational Enterprises and Social Policy
- ILO Declaration on Fundamental Principles and Rights at Work – elimination of child labour, abolition of forced labour, prohibition of discrimination, freedom of association and the right to collective bargaining and fundamental freedoms
- United Nations (UN) Sustainable Development Goals – specially SDG 8
- UN Guiding Principles on Business and Human Rights (UNGPs)
- OECD Guidelines for Multinational Enterprises
- UN Global Compact Principles (UNGCP)<sup>2</sup> – which we are a signatory

<sup>1</sup> Sustainability policy. Link: <https://www.siemensgamesa.com/en-int/-/media/siemensgamesa/downloads/en/investors-and-shareholders/corporate-governance/corporate-policies/20210916-sustainability-policy-def.pdf?la=en-bz&hash=6FD106DEBA21E95AD17AFE74B70E2E1287FC525E>

<sup>2</sup> See United Nations Global Compact website. Link: <https://www.unglobalcompact.org/what-is-gc/participants/4098>

## 2. Structure, Operations and Supply Chain

### Structure

SGRE AU is 100% owned by Siemens Gamesa Renewable Energy S.A.U. (based in Zamudio, Spain) within the Siemens Gamesa Renewable Energy group of companies worldwide (“Siemens Gamesa”)<sup>3</sup>.

Siemens Gamesa has a presence in more than 90 countries around the world, and its WTGs are installed in more than 70 countries; and operates more than 15 manufacturing plants in over 10 countries (including regions within Europe, the United States, India, Brazil, China and Morocco) and has approximately 40 sales offices.

Siemens Gamesa is a constituent member of prestigious international sustainability indexes, such as Dow Jones Sustainability Indices®, FTSE4Good® and Ethibel Sustainability Index®. It is noteworthy that Siemens Gamesa received an A rating (on a scale of AAA-CCC) in the MSCI ESG ratings assessment made in February 2022, allowing the company to be included in the MSCI indices with an investment grade rating. SGRE was also included in 2020 Bloomberg Gender-Equality Index (GEI). Key figures are set out in Table 1.

Table 1: Key figures

	FY18	FY19	FY20	FY21	FY22	FY23	Var. 22/23
Revenues (€million)	9,122	10,227	9,483	10,198	9,814	9,090	-7%
Equivalent MW sold	8,373	9,492	9,968	10,995	8,158	8,557	+5%
MW installed (cumulative)	88,840	98,735	107,502	117,666	127,476	136,869	+7%
MW fleet under maintenance	56,725	60,028	74,240	79,199	82,276	81,873	-1%
No. suppliers	17,051	17,890	18,932	19,363	19,842	18,590	-6%
Procurement volume (€million)	6,030	8,238	7,365	6,863	9,027	9,114	+1%
Headcount	23,034	24,453	26,114	26,182	27,604	29,267	+6%
Lost Time Injury Rate - LTIR	2.07	1.67	1.36	1.43	1.61	2.28	+42%
Total Recordable Injury Rate - TRIR	5.10	4.71	3.14	3.13	3.17	3.98	+26%
Women in workforce (%)	18.9	18.8	18.8	19.1	19.6	19.9	+0.3 p.p.
Women in management positions (%)	10.8	10.2	11.7	12.9	14.1	14.8	+0.7 p.p.
Employee hiring	2,466	4,498	4,932	3,750	5,150	5,353	+4%
Employee exits	4,853	3,145	3,275	3,794	3,850	3,747	-3%
Training hours (thousands)	619	905	840	555	747	845	+13%
Charitable contributions (€million)	2.12	0.43	2.90	0.79	0.91	0.47	-48%
Energy consumption (TJ)	1,050	1,256	1,202	1,153	1,048	1,090	+4%
Energy consumption rate (GJ/MW)	168	127	137	114	107	116	+8%
Renewable electricity use (share as %)	72	61	100	100	100	100	-
Water consumption (x1,000 m3)	446	667	522	553	479	390	-19%
Waste generated (kt)	47.8	58.5	68.3	63.1	51.9	58.0	+12%
Waste intensity (t/MW installed)	7.7	5.9	7.8	6.2	5.3	6.2	+17%
CO <sub>2</sub> emissions (Scope 1+2) (kt CO <sub>2</sub> )	61.4	70.7	27.9	28.8	22.7	33.4	+47%
CO <sub>2</sub> intensity (Scope 1+2) (t/MW installed)	9.8	7.1	3.2	2.8	2.3	3.6	+56%
CO <sub>2</sub> displaced (million t CO <sub>2</sub> )	233	259	281	301	327	356	+9%
Wastewater discharges (x1,000 m3)	451	329	342	492	440	344	-22%
United Nations Global Compact	✓	✓	✓	✓	✓	✓	-
Carbon Disclosure Project (CDP)	C	C	A	A	A	<sup>(1)</sup> A	-
EcoVadis	-	-	Gold	Platinum	Platinum	Platinum	-

<sup>3</sup> Siemens Energy AG (a listed company in Frankfurt, Germany) has a 100% stake in Siemens Gamesa Renewable Energy S.A.U. (via Siemens Energy Global GmbH & Co. KG). A Modern Slavery Statement has also been submitted by its local Australian entity, Siemens Energy Pty Ltd (ACN 636 537 409).

## Operations

Siemens Gamesa is a multinational corporate group and works at the heart of the global energy revolution, with a leading position in renewable (wind) energy comprising of:

- engineer, manufacture and supply of onshore and offshore WTGs (“WTGs”);
- service and/or maintenance of WTGs; and
- as well as delivery of wind farm project development or solution(s) in certain regions.

From an Australian perspective, SGRE AU’s operations includes its overseas related companies where products are manufactured or produced, imported into Australia, and subsequently sold, distributed, installed and serviced by SGRE AU.

## Supply Chain

SGRE AU does not have manufacturing facilities in Australia. Logistics requirements are outsourced to third parties. SGRE AU’s procurement function is managed centrally at the global headquarters in Viscaya, Spain, which is organised by material fields within a centrally managed commodity management structure. Only the Australian specific aspects of local procurement for the WTG project is handled by SGRE AU.

The products we sell are sourced from all over the world with Siemens Gamesa’s factories being the biggest supplier of product by value (and are set out below).

Facility	Location(s)
Blade	Fort Madison (United States), Aalborg (Denmark), Hull (United Kingdom), Tangier (Morocco), Nellore (India), Somozas (Spain), Lingang (China), Vagos (Portugal) and Le Havre (France). In addition to its own manufacturing, Siemens Gamesa also sources blades from third-party manufacturers located in Mexico, Brazil, Turkey, India, China and Poland.
Nacelle	Hutchinson/Kansas (United States), Camaçari (Brazil), Brande (Denmark), Cuxhaven (Germany), Ágreda (Spain), Aliaga (Turkey), Mamandur (India), Tianjin (China), Le Havre (France) and in Taichung (Taiwan)
Tower	Supplied through Windar Renovables, S.L. (which has factories in Spain, India, Mexico, Brazil and Russia)
Generator	Reinosa (Spain), Camaçari (Brazil) and Tianjin (China). Direct drive generators are assembled in Brande (Denmark) and Cuxhaven (Germany).
Gearbox	Lerma and Sigüeiro, Spain
Converter	Madrid (Spain), Valencia (Spain) and Tianjin (China)
Cabinet	Valencia (Spain) and Tianjin (China)

### **3. Risks of Modern Slavery Practices in our Operations and Supply Chain**

Globally, Siemens Gamesa requires that all of its employees and managers, suppliers and third-party intermediaries comply with applicable laws and regulations. These are based, amongst others, on the labour principles of the United Nations Global Compact principles and the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.

As part of our due diligence process, we have identified the following risks in our supply chain:

- Human rights abuse.
- Unfair operating practices, such as corruption and bribery.
- Forced and compulsory labor and child labor.
- Occupational hazards for health and safety.
- Environmental impacts.
- Conflict minerals.

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

#### **Business Conduct Guidelines (“BCG”)**

Every Siemens Gamesa company employee, including managers and the managing boards are required to agree to comply with Siemens Gamesa’s global BCG. These BCG mandate how we conduct business, act within our company and in relation to external business partners on various topics that include basic working conditions and human rights.

#### **Supply Chain Management**

There are processes and policies in place that aim to ensure suppliers meet specific environmental, social and governance (“ESG”) requirements. These policies and procedures are focused on human rights (including conflict minerals), corruption, conflict of interest, antitrust, confidentiality and data privacy, gifts and hospitality.

Our sustainable supply chain strategy focuses on two levels: suppliers and products.

At the supplier level, we are continuously promoting the implementation of standards and processes to enshrine sustainability as a core factor in suppliers’ business activities. Here, we anticipate utilizing risk and performance assessments to identify critical areas and incentivize achievements as well as continuous improvement. The assessments range from a broad set of

criteria covering social (e.g., human rights), environmental (e.g., decarbonization, recyclability) and governance aspects.

Accordingly, we:

- promote sustainability across all suppliers as we see a positive link between sustainability, resilience, and economic performance.
- work with sustainability best-in-class suppliers to learn from each other.
- also work with current sustainability laggards to help them find the right focus and improvements on their journey to accelerate our impact.

At the product level, we aim to foster transparency on raw materials in complex supply chains and to assess the related impacts of our sourced goods and services on society and environment. Jointly, we aim to continuously improve sustainability on both levels.

Sharing the commitment to society alongside the supply chain, we aspire to the following:

- By 2023, 100% of our suppliers — in terms of purchasing volume (PVO) — accept the Supplier Code of Conduct.
- By 2023, 90% of high sustainability risk suppliers assessed and/or audited based on total purchasing volume (PVO) from high sustainability risk suppliers.
- By 2025, 30% of suppliers — in terms of purchasing volume (PVO) covering the categories of purchased goods and services as well as transportation and distribution — commit to targets that reduce greenhouse gas (GHG) emissions and are considered as “science-based”, i.e., in line with the Science Based Target initiative (SBTi).

Accordingly, Siemens Gamesa is implementing targets on both levels that are reflected in targets for individual suppliers as well as individual targets for Siemens Gamesa employees to promote implementation on all levels.

### **Binding Code of Conduct for Suppliers**

All SGRE AU’s suppliers and third-party intermediaries must adhere to the Siemens Gamesa’s Supplier Code of Conduct which sets out the standard of ethical, lawful and sustainable conduct expected from our “business partners”.

SGRE AU requires its employees, business units, affiliated companies, suppliers and third-party intermediaries to act in accordance with UN Global Compact principles at all times.

SGRE AU’s supplier relationship policy<sup>4</sup> the Supplier Code of Conduct<sup>5</sup>, the General Purchasing

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<sup>4</sup> See: Siemens Gamesa Supplier Relationship policy. Link: <https://www.siemensgamesa.com/en-int/-/media/siemensgamesa/downloads/en/investors-and-shareholders/corporate-governance/corporate-policies/supplier-relationship-policy.pdf?la=en-bz&hash=552A19E60659E142285C31B2E6921EE4D2041196>

<sup>5</sup> See: Code of Conduct for Suppliers and Third Party Intermediaries. Link: [https://www.siemensgamesa.com/en-int/-/media/siemensgamesa/downloads/en/sustainability/code-of-conduct/code\\_of\\_conduct\\_for\\_suppliers\\_and\\_third\\_party\\_intemediaries\\_en.pdf?la=en-bz&hash=D284F9974754A8848ABC85A15035AF0F1022B007](https://www.siemensgamesa.com/en-int/-/media/siemensgamesa/downloads/en/sustainability/code-of-conduct/code_of_conduct_for_suppliers_and_third_party_intemediaries_en.pdf?la=en-bz&hash=D284F9974754A8848ABC85A15035AF0F1022B007)

Conditions<sup>6</sup>, our frame contracts and our internal rules and procedures form the basis for these objectives, as they all set minimum expectations for suppliers to comply with. They integrate the UN Global Compact on Human Rights, Environment and Anti-Corruption principles and provide fundamental guidance for our business activities.

The Supplier Code of Conduct (refer to table below for details of coverage by purchasing volume):

- (a) reflects the BCG;
- (b) is based on, among others, the UN Global Compact and the principles of the International Labor Organization, the principles of the Rio Declaration on Environment and Development, the Responsible Business Alliance Code of Conduct<sup>7</sup>, WindEurope<sup>®</sup> Industry Principles and ISO standards;
- (c) establishes standards to ensure that working conditions in the company supply chain are safe, that workers are treated with respect and dignity, and that business operations with suppliers are ethical, social and environmentally responsible;
- (d) is updated on a regular basis as necessary.
- (e) is incorporated into our General Purchasing Conditions, framework contracts and purchase agreements with each supplier, as well as into procurement tools.

### Purchasing volume covered by Supplier Code of Conduct

(% total PVO) <sup>(1)</sup>	FY18	FY19	FY20	FY21	FY22	FY23
Purchasing volume (PVO)	65%	84%	85%	89%	89%	100%
Europe, Middle East and Africa	70%	86%	87%	94%	90%	100%
Americas	66%	80%	83%	90%	82%	100%
Asia, Australia	43%	79%	79%	73%	90%	100%

Note: In FY22, the regional breakdown was adapted in order to reflect the supplier region instead of the accounting region.

(1) This percentage indicates the share of the procurement value that has successfully completed the acceptance of the Code of Conduct out of the procurement volume for which this is a mandatory requirement.

### Comprehensive Supplier Management

SGRE AU has released the Booklet for the Code of Conduct for Suppliers and Third Party Intermediaries<sup>8</sup> (“Code of Conduct Booklet”), which detail our expectations towards our suppliers in each of the above requirements, being an important support for our sustainability detection modules. The development of the Supplier Code of Conduct and the Code of Conduct Booklet is the result of the work performed by the Supplier Lifecycle Management and

<sup>6</sup> See General Purchasing Conditions. Link: [https://www.siemensgamesa.com/en-int/-/media/siemensgamesa/downloads/en/sustainability/purchase-conditions/siemens-gamesa-gpc-002-2018-06-en\\_sg-re-general-purchasing-conditions.pdf?la=en-bz&hash=1AAE86231A89BD2E3918DE4EEE1DA5BB0DDC316B](https://www.siemensgamesa.com/en-int/-/media/siemensgamesa/downloads/en/sustainability/purchase-conditions/siemens-gamesa-gpc-002-2018-06-en_sg-re-general-purchasing-conditions.pdf?la=en-bz&hash=1AAE86231A89BD2E3918DE4EEE1DA5BB0DDC316B)

<sup>7</sup> See Responsible Business Code of Conduct. Link: <http://www.responsiblebusiness.org/code-of-conduct/>

<sup>8</sup> See: Booklet for Code of Conduct for Suppliers and Third-Party Intermediaries. Link: <https://www.siemensgamesa.com/en-int/-/media/siemensgamesa/downloads/en/sustainability/suppliers/sgre-conduct-suppliers-and-party-intermediaries.pdf?la=en-bz&hash=D17D5001EF6FD9744633CBC0FE133C20AC0104C0>



Sustainability community, which Siemens Gamesa has established since 2017. The group has representation in external communities, like the WindEurope® Sustainability Task Force, and is engaged in relevant sustainability topics.

In FY23, Siemens Gamesa purchased almost €9.1 billion (€9.0 billion in FY22) from 18,590 suppliers (19,842 suppliers in FY22) Tier-1 suppliers (Suppliers that deal directly with and directly invoice Siemens Gamesa). These suppliers are continuously screened and assessed for compliance with our Code of Conduct requirements. See below – Table 2: Tier-1 suppliers and Table 3: Purchasing volume.

The number of suppliers whose annual invoicing exceeded €10 thousand at the end of the reporting cycle FY23 amounted to 10,565 (10,964 in FY22), i.e., 57% of total Tier-1 suppliers, which is an indication of the balance between large and small suppliers.

Additionally, we differentiate our supplier base into critical suppliers and high-risk suppliers. Critical suppliers: Siemens Gamesa monitors critical suppliers, identified as those that meet the following conditions:

- (f) all suppliers that have been designated within the commodity strategy based on relevance and criticality; and
- (g) all remaining suppliers that have an annual purchasing volume (PVO) that exceeds €50,000. Once identified as critical suppliers, we invite them to participate in our ESG risk and performance assessment supplier journey, as shown below – Supplier Journey in our ESG Risk and Performance Management Framework.

In FY23, critical suppliers classified under these conditions accounted for 35% (35% in FY22) of total purchasing volume, i.e., approximately €3.2 billion (€3.2 billion in FY22). [See Table 3 - Purchasing volume (PVO) under sustainability focus] High-sustainability risk suppliers: Additionally, Siemens Gamesa keeps track of suppliers that pose a high risk from a sustainability point of view, identified in terms of:

- (a) operating or are based in a high-risk country and/or high-risk industry; or
- (b) having incidents of non-compliance and are not participating or have a critical finding in one of the Code of Conduct compliance modules in the ESG Risk and Performance Management Framework.

**Table 2: Tier 1 – suppliers**

(number)	FY18	FY19	FY20	FY21	FY22	FY23
Europe, Middle East and Africa	10,162	11,340	11,481	11,618	12,834	12,462
Americas	3,506	3,542	4,042	3,837	3,242	2,665
Asia, Australia	3,383	3,571	4,014	4,494	3,766	3,463
<b>No. tier-1 suppliers <sup>(1)</sup></b>	<b>17,051</b>	<b>17,890</b>	<b>18,932</b>	<b>19,363</b>	<b>19,842</b>	<b>18,590</b>

*Note: In FY22, the regional breakdown was adapted in order to reflect the supplier region instead of the accounting region.  
<sup>(1)</sup> Tier-1 suppliers: Suppliers that deal directly with, and directly invoice, Siemens Gamesa.*

**Table 3: Purchasing volume (PVO) under sustainability focus**

(€million)	FY18	FY19	FY20	FY21	FY22	FY23
PVO of Critical tier-1 Suppliers	2,061	2,037	2,275	2,301	3,155	3,146
Europe, Middle East and Africa	1,323	1,397	990	1,076	295	540
Americas	300	228	320	376	1,097	1,080
Asia, Australia	438	412	965	849	1,762	1,526
PVO Sustainability high-risk suppliers	724	1,089	1,168	1,521	2,003	1,994
Europe, Middle East and Africa	262	503	348	407	1,113	385
Americas	83	179	244	277	326	354
Asia, Australia	278	407	576	837	564	1,256

Note: In FY22, the regional breakdown was adapted in order to reflect the supplier region instead of the accounting region.

Suppliers with proven incidents of non-compliance with any sustainability aspect are considered as “high sustainability risk” suppliers, regardless of their location (see Table 4: No. of suppliers under sustainability focus).

Suppliers identified as having high sustainability risk to Siemens Gamesa in FY23 accounted for 22% (22% in FY22) of total purchasing volume, i.e., approximately €2.0 billion (€2.0 billion in FY22). See Table 3 - Purchasing volume (PVO) under sustainability focus.

**Table 4: No. of suppliers under sustainability focus**

(number)	FY18	FY19	FY20	FY21	FY22	FY23
No. of Critical tier-1 Suppliers	1,061	748	1,283	1,302	2,388	2,527
Europe, Middle East and Africa	487	356	380	710	418	743
Americas	255	142	150	89	939	884
Asia, Australia	319	375	895	53	1,031	900
No. of Sustainability high-risk suppliers	792	480	468	823	860	385
Europe, Middle East and Africa	268	111	110	295	477	91
Americas	208	85	78	214	202	82
Asia, Australia	316	364	362	412	181	212

Note: In FY22, the regional breakdown was adapted in order to reflect the supplier region instead of the accounting region.

## Risk Awareness

The Siemens Gamesa’s Sales Business Approval (“SBA”) process is the internal approval process for all WTG projects globally including the development of wind farm opportunities.

This SBA procedure:

- (a) defines the framework for decision-making regarding project approvals in the supply and service business, i.e. when, how, and at what level management decisions based on compliance risks are required;
- (b) includes a project risk evaluation where each project is thoroughly evaluated for any such potential risk;
- (c) requires that compliance is evaluated mandatorily, through the Compliance Risk Assessment (“CRA”) using pre-defined questionnaires in order to identify, mitigate and/or approve risks. Human Rights is a module of the CRA within the SBA.
- (d) has a due diligence process to both proactively and systematically identify potential human rights risks, using a predefined detailed questionnaire and external ESG tools with regard to its location, labor rights, local community rights, livelihoods and the

partners involved, including customers, suppliers, consortium partners and security detail, where applicable.

### Supplier Assessment – Corporate Responsibility Self-Assessment

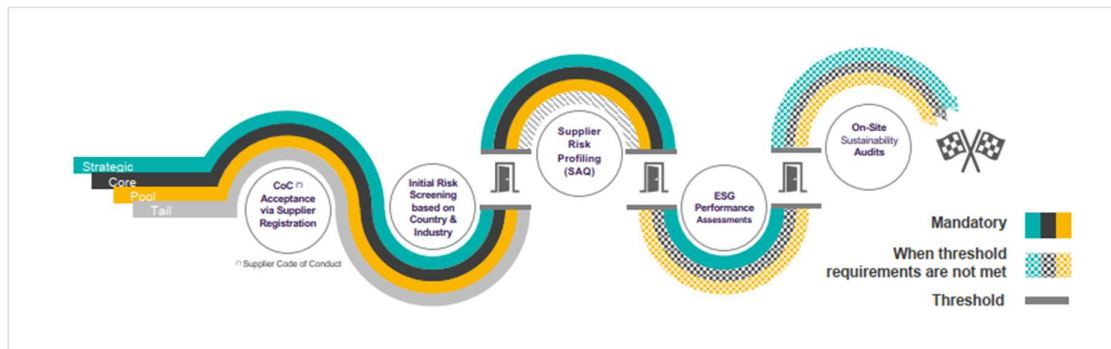
The CRA is conducted every 2 years; however, effective from 2021, an additional high-risk CRA is conducted in odd years focusing on internal and external risk triggers to assess the countries with the highest compliance risk. The high-risk CRA 2023 was completed in August 2023 for China, India, Mexico, Pakistan and Spain. Measures to manage the risks identified in this CRA started immediately and will be finalized before the next CRA in FY24.

In addition to the CRA, compliance risks that are material in accordance with the Enterprise Risk Management (“ERM”) methodology are managed by ERM on a quarterly basis.

In response to the ESG supply chain risks and opportunities identified, we have implemented an ESG Risk and Performance Management Framework, as illustrated in below that assesses our suppliers' adherence to the Code of Conduct. Within this framework, our suppliers undergo a supplier assessment journey that is taking both conditions into account:

- (a) the inherent risk of the business in which the supplier operates in, such as country risk, industry risk, and strategic impact; as well as
- (b) the supplier's ESG performance based on a third-party assessment.

### Supplier Journey in our ESG Risk and Performance Management Framework



The result of the supplier specific assessment journey will be consolidated into a responsible business score in order to identify suppliers that manage ESG aspects well and suppliers that would need to improve their current level of performance. The responsible business score is reflected in our supplier lifecycle management framework and is part of commodity strategies, as well as awarding decisions.

In this way, we promote sustainability across a broad range of suppliers and generate positive impacts, while aligning our sustainability ambitions through this transparency process.

The supplier assessment journey is our pathway towards a responsible sourcing. Best-in-class

and best-in-progress suppliers are promoted as part of our supplier awarding criteria. In this way, we incentivize sustainability laggards to improve and sustainability leaders to continuously improve. Fostering improvements across our suppliers is one of our key means to generate positive impacts through our activities.

Supplier's ESG performance response is distinguished as follows:

- **Corporate Responsibility Self Assessments (“CRSA”):** A supplier of critical impact receives a Code of Conduct questionnaire and provides its own assessment of fulfilment of the Code of Conduct requirements.
- **ESG Performance Assessment:** A high impact supplier conducts a sustainability performance assessment, submitted by a third party on behalf of Siemens Gamesa, that is benchmarked against our Code of Conduct standards, which are universally applied. In this way, the supplier demonstrates its commitment to our Code of Conduct and differentiates itself from other businesses. In response, the supplier will receive customized improvement recommendations and necessary corrective actions.
- **Supplier Quality Audits with Sustainability Scope:** As part of our internal Supplier Qualification and Audits processes, audit questionnaires have been devised that cover the scope of the Code of Conduct and are applied to suppliers that are critical from a quality perspective.

See Table 5 for figures.

**Table 5: Supplier monitoring**

(number)	FY18	FY19	FY20	FY21	FY22	FY23
<b>Sustainability Self-Assessments (CRSA)</b>	<b>1,104</b>	<b>1,132</b>	<b>783</b>	<b>444</b>	<b>1,863</b>	<b>2,788</b>
Europe, Middle East and Africa	706	764	411	148	685	1,147
Americas	179	224	169	112	288	458
Asia, Australia	219	281	270	227	890	1,183
<b>External Sustainability Audits</b>	<b>201</b>	<b>130</b>	<b>199</b>	<b>112</b>	<b>117</b>	<b>91</b>
Europe, Middle East and Africa	111	86	118	68	62	46
Americas	48	44	54	36	10	7
Asia, Australia	42	35	56	24	45	38
<b>Quality audits with sustainability questions</b>	<b>146</b>	<b>323</b>	<b>197</b>	<b>374</b>	<b>913</b>	<b>621</b>
Europe, Middle East and Africa	83	142	90	203	590	279
Americas	17	88	36	83	133	218
Asia, Australia	46	93	71	88	190	124

*Note: In FY22, the regional breakdown was adapted in order to reflect the supplier region instead of the accounting region.*

In FY23, Siemens Gamesa ensured that 87% (89% in FY22) of its purchasing volume (PVO) from suppliers with a high sustainability risk was covered by at least one of the modules mentioned above.

### External Sustainability Audits

As part of the supplier’s ESG performance response, Siemens Gamesa engages internationally recognized audit firms to conduct on-site audits based on the principles of the Code of Conduct (see Table 5 for figures). The outcome is an in-depth assessment and report that

enables Siemens Gamesa and its suppliers to identify and manage potential sustainability risks.

For SGRE AU, the focus remains to align with our global targets but also to continue to further investigate the risk areas highlighted in our findings. To address these areas SGRE AU is committed to continue to:

- focus on suppliers that may have areas of non-conformance identified; and
- continue to work with existing suppliers to collaborate and agree on an action plan consisting of appropriate improvement measures. These shall mitigate and eliminate the adverse impacts caused by the breaches and enable the supplier to identify and prevent similar occurrences in the future. We require our suppliers to engage actively and without reservation in these activities.

### Responsible minerals sourcing - General

We are committed to working toward avoiding the use, within our supply chain, of minerals from conflict affected and high-risk areas which are affected by the risks defined in Annex 2 of the OECD Due Diligence Guidance <sup>9</sup>.

Conflict Minerals are defined as cassiterite, columbite-tantalite, gold, wolframite, and their derivatives, or any other minerals or their derivatives (3TG i.e., tantalum, tin, tungsten, the ores from which they originate, and gold) that may be used to finance the conflict in the DRC (Democratic Republic of Congo) region. Therefore, Siemens Gamesa has detailed its commitment to Responsible Minerals Sourcing<sup>10</sup>.

We are conducting a uniform enterprise-wide process to determine the use, source, and origin of the relevant minerals in our supply chain (Supply Chain Due Diligence), including the Responsible Minerals Assurance Process (RMAP) as part of the Responsible Minerals Initiative (RMI).

The advantageous position of our ultimate parent company, Siemens Energy, as an active member of the Responsible Mineral Initiative (RMI) gives Siemens Gamesa access to Reasonable Country of Origin Information (RCOI) on a smelter level. We purchase 3TG from conformant smelters when these minerals are necessary to manufacture our products. Siemens Gamesa actively engages with RMI's Responsible Minerals Assurance Process to mitigate the risk of working with suppliers whose smelters have not been audited by RMI so far.

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<sup>9</sup> See OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Link: <https://www.oecd.org/daf/inv/mne/mining.htm>

<sup>10</sup> Link: <https://www.siemensgamesa.com/en-int/-/media/siemensgamesa/downloads/en/sustainability/suppliers/sgre-responsible-mineral-sourcing.pdf?la=en-bz&hash=83DA2140B2BCA35FD106FOA0B12CF42924C62155>

## Responsible minerals sourcing - Rare earth elements

Rare earth elements (“REEs”) are a group of 17 metals that are moderately abundant in the earth’s crust — some even more abundant than copper, lead, gold, and platinum — and share certain unique properties, including heat resistance and high electrical conductivity. These characteristics make REEs essential to many products, ranging from smartphones to more advanced technologies, particularly green technologies. The manufacture of magnets represents the single largest and most important end use of REEs for Siemens Gamesa. While REE reserves can be found worldwide, China supplies most of the global REE demand.

The wind industry needs REEs for permanent-magnet synchronous generators (“PMSGs”) employed in some wind turbine models. In this connection, Siemens Gamesa purchases magnets that contain REEs, but does not directly purchase any rare earth elements. Our suppliers of magnets that contain rare earth elements are relatively small and represent a marginal amount.

These suppliers are in the high sustainability risk category and are subject to all related actions to enforce adherence to the Code of Conduct.

Accordingly, we have implemented a thorough due diligence framework to avoid potential adverse impacts related to our activities. We conduct regular sustainability audits with our first-tier magnet suppliers to assess their sustainability performance and implement appropriate procedures and policies. We also aim to adopt the OECD due diligence guidance for rare earths and are implementing a due diligence process to provide transparency on lower tier suppliers to verify the origin of our source materials and to ensure that the REEs used in our magnets are sourced with the appropriate respect for the environment and human rights.

Siemens Gamesa works continuously to improve the design of its direct drive generators in order to optimize the use of all materials, including rare earth permanent magnets. Siemens Gamesa aims to phase out the use of heavy rare earth elements (dysprosium and terbium) in permanent magnets to strengthen the products’ economic, environmental, and social sustainability.

## Implementation in Australia

Siemens Gamesa supply chain management processes and systems are implemented by SGRE AU. If areas of non-conformity are identified, the supplier and SGRE AU agree on an action plan consisting of appropriate improvement measures to mitigate and eliminate the adverse impacts caused by the breaches and enable the supplier to identify and prevent similar occurrences in the future. We require our suppliers to engage actively in these activities without reservation.

All measures put in place after inspections are incorporated into the company-wide supplier management process at Siemens Gamesa and are systematically selected and pursued. Implementation of the measures impacts the supplier’s annual performance rating and the

assessment of the supplier’s future potential, as well as the supplier's approval within the regular supplier qualification process.

If suppliers with low sustainability performance do not improve under their development plan, they are phased out of SGRE AU’s and Siemens Gamesa supplier base.

Breaches may be reported at any time by using the Group Compliance Whistleblowing Channel. If any breaches are confirmed, systems are in place to communicate with the Procurement community as well as with any cross-functions and stakeholders that are affected. If necessary, offending suppliers are blocked globally.

Training is one of the key elements of our compliance system to ensure that all SGRE AU employees are aware of the compliance rules and know how to put them into practice. Due to the very nature of their functions, some employees are exposed to specific compliance risks and must be provided with regular compliance training, which may consist of classroom/online training and e-learning courses. To maintain awareness of compliance issues, the following compliance training is available.

- Compliance Basic Training, covering anti-corruption, anti-trust, anti-money laundering, human rights, conflict of interest, and compliance as part of other business processes. It is targeted at all Siemens Gamesa employees.
- Business Conduct Guidelines e-Learning targeting all Siemens Gamesa employees with a valid e-mail address.
- Compliance introduction is part of the global Human Resources on-boarding training.
- Global Compliance awareness and refresher course for **Managing Directors** on a yearly basis.
- Training on request to mitigate local or business-or business-specific risks (e.g., compliance in procurement, business partners, and customer projects).

For information relating to Siemens Gamesa, see Table 6 below.

**Table 6: Compliance training**

<i>(number of employees)</i>	FY18	FY19	FY20	FY21	FY22	FY23
Number of employees that attended the <b>Compliance Basic Training</b> through Sept. 30, 2022 (including prior years)	-	-	2,470	9,938	12,275	14,268
Number of active employees that completed the <b>Business Conduct Guidelines e-learning</b> through Sept. 30, 2022 (incl. prior years)	-	-	7,971	14,740	18,754	20,365
Number of active employees that completed the <b>Protecting our Personal Data e-learning</b> through Sept. 30, 2022 (Inc. prior years)	-	-	-	13,795	17,454	20,341
Number of active employees that completed the <b>Export Control &amp; Customs (ECC) Global Awareness e-learning</b> through Sept. 30, 2022 (Inc. prior years)	-	-	12,769	14,371	17,049	19,632

In addition, management at Siemens Gamesa must ensure that all our employees are informed about relevant internal compliance rules, processes and tools and that this information is kept up to date. Hence, the Compliance Organization designs an annual compliance communication plan in order to maintain overall awareness, including activities to

cover the essential aspect of tone from the top. The plan is approved by the Audit, Compliance and Related-Party Transactions Committee and the Executive Committee.

### Occupational Health & Safety

Occupational health & safety is an essential part of our Business Code of Conduct, internal monitoring systems, risk management work and internal controls. It is embedded everywhere in the Siemens Gamesa culture and the HSE policy<sup>11</sup>.

Our company complies with prevailing legislation in every market where we are located, and we establish such preventative measures as may be needed.

Beyond specific market requirements, we are guided at all times by the pursuit of excellence and continuous improvement, and we apply an integrated health and safety, environment and quality management policy lens to everything that we do.

### Channels for reporting misconduct

We offer all employees and third parties protected reporting channels to report specific information about suspected compliance violations. In doing so, they help the Company to identify and eliminate misconduct and grievances and protect it against risks or harm that may result.

Compliance violations may be reported to the following:

- Manager
- Chief Compliance Officer
- Regional/Division Compliance Officer
- Human Resources personnel
- Integrity Hotline (Whistleblowing Channel, with the possibility of remaining anonymous)
- Ombudsman

Information on possible violations can be provided confidentially and anonymously, as needed, if legally permissible under local law. In addition, the Company does not tolerate any kind of retaliation against individuals who have reported compliance violations. The Compliance department examines all reports and takes appropriate measures.

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<sup>11</sup> Link: <https://www.siemensgamesa.com/en-int/-/media/siemensgamesa/downloads/en/sustainability/siemens-gamesa-policy-august-2017.pdf>



## 5. How we Assess the Effectiveness of these Actions

SGRE AU uses the following mechanisms to assess the effectiveness of actions taken:

- **Executive Management Reviews:** SGRE AU conducts reviews with executive management to ensure that there is an awareness and alignment on the processes implemented and future activities with regards to modern slavery risks across our business. This achieves both endorsement and awareness while providing support to ensure that this important topic is addressed thoroughly.
- **Cross-functional Reviews:** This is supplemented by cross-functional reviews between supply chain management, Compliance and Legal teams, which are both formal and informal to align and ensure that the different functions of the business are aware of progress and to allow updates.
- **Continuous Monitoring:** We will continue to monitor and review processes and procedures to ensure progress including promotion of awareness of the topic of Modern Slavery and why it is important to address.

## 6. Process of Consultation with any Entities the Reporting Entity owns or controls

Siemens Gamesa's policies and requirements in relation to Modern Slavery will apply to all entities within the group globally, including its branches in Singapore and New Zealand.

## 7. Any other relevant information

Siemens Gamesa's commitment to sustainability and its contribution to the UN's Sustainable Development Goals (including sustainable supply chains and human rights) are set out in Siemens Gamesa's Sustainability Vision 2040<sup>12</sup> and Consolidate Non-Financial Report<sup>13</sup>.

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<sup>12</sup> Link: <https://www.siemensgamesa.com/en-int/sustainability>

<sup>13</sup> Link: <https://www.siemensgamesa.com/en-int/-/media/siemensgamesa/downloads/en/sustainability/siemens-gamesa-consolidated-non-financial-statement-2023-en.pdf>

This statement was approved by the Board of SGRE AU on 1<sup>st</sup> July 2024 for the year ended 30<sup>th</sup> September 2023.

*Signed in accordance with a resolution of the Board of Directors*

**Siemens Gamesa Renewable Energy Pty Ltd**

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Samuel Morrillon  
Director and CEO

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Dirk Janssen  
Director and CFO