

MODERN SLAVERY STATEMENT 2025

NORDEX OCEANIA



MODERN SLAVERY STATEMENT NORDEX OCEANIA 2025

AIM, PURPOSE AND SCOPE

This Modern Slavery Statement has been prepared by Nordex Oceania Pty Ltd (ACN 128 202 102) ("Nordex Oceania") pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) for the reporting year 01 January – 31 December 2025.

Nordex Oceania belongs to the global Nordex group of companies (hereinafter also referred to as "the Nordex Group"). Nordex Oceania is the wholly owned subsidiary of Nordex Energy Internacional, S.L.U. The parent company for the Nordex Group, Nordex SE, is listed on the Frankfurt Stock Exchange (ISIN: DE000A0D6554).



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1. INTRODUCTION

As a manufacturer of innovative onshore wind turbines, the Nordex Group works with its customers to continually increase the share of renewable energies in the global energy mix. Sustainability is at the core of the Nordex Group's business model, being essential not only to the Nordex Group's commercial future, but also for preserving our environment for future generations.

For this reason, in 2025 the Nordex Group continued to pursue the holistic approach reflected in its sustainability strategy titled 'Together for change – Wind for a sustainable future'. This strategy is the foundation of the Nordex Group's actions and encompasses the central themes of sustainability for the period 2022-2025 and beyond. In the course of 2025, the Nordex Group developed a new sustainability strategy, based on this existing strategy, and which was published in early 2026.

The Nordex Group is committed to the idea that as a green energy business it should also be accountable for its impact on people, including the workers in our supply chains and the communities in which we operate.

This Modern Slavery Statement provides an overview of the progress the Nordex Group is making in addressing modern slavery risks, as well as the planned actions for the year ahead.

2. OUR BUSINESS AND SUPPLY CHAINS

The Nordex Group develops, manufactures, delivers, installs and services wind turbines in the onshore sector. It has more than 11,300 employees globally and operates in more than 40 countries where we are driving forward the global energy revolution by providing affordable, green energy.

The Nordex Group currently has Sales and Service offices in around 30 countries, mainly in Europe, North and South America, as well as in other selected markets such as Australia, China, India, Pakistan, South Africa and Türkiye, with colleagues also working across our production and installation sites.

The Nordex Group currently has partial oversight of its extended supply chains beyond manufacturing sites and tier 1 suppliers, i.e. suppliers that contract directly with the Nordex Group.

The key materials, products, and services purchased by the Nordex Group include:

- Direct materials: nacelle components, steel tower sets, raw concrete tower materials, blade sets, and raw blade materials.
- Indirect materials: tools, equipment, and ancillaries.
- Services: transportation, cranes, and installation.



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3. RISKS IDENTIFIED IN OPERATIONS AND SUPPLY CHAINS

With reference to our previous Modern Slavery Statement for the 2024 reporting year, our highest risks regarding modern slavery and human rights remain as follows:

3.1 Sourcing of materials for the wind turbines

Many of the materials in wind turbines are mined. Mining companies' operations producing materials such as iron ore, copper, aluminium, and lead can have a severe impact on workers, communities near mines, and the environment. The sites where mining takes place for the minerals used in the production of wind turbines are geographically widespread. Highly industrialised countries, such as Australia and Canada, represent the main producers of certain minerals, such as aluminium, iron and nickel. However, a large proportion of global production of the minerals used in wind turbines is mined in developing countries where there is a greater risk of exploitation.

The Nordex Group has no tier-1 relationship with mining and/or other types of raw materials sourcing companies. Also, despite the increased risks, the Nordex Group has no indication that there were cases or high-risk instances of forced or child labour within its operations in regions with an overall increased risk for forced labour. Nordex remains committed to upholding the highest standards of human rights as outlined in our Human Rights Policy.

3.2 Indirect spend

We also procure goods and services for our business operations which are not part of the wind turbine. These include IT equipment, car leasing, facilities management, special tooling and equipment and other services for training, recruitment, and professional services. Cleaners and other functions covered by facilities management are often a hidden workforce and may also often be subcontracted, making them more vulnerable to negative human rights impacts, particularly related to wages and/or long hours. There are risks of exploitative labour practices and modern slavery in various roles in this category and the working conditions can often be a concern.

3.3 Transportation and logistics

We are also aware that the Nordex Group uses suppliers for the transport of materials and components to both manufacturing and installation sites. This can be by road, air, or sea. There is a risk of local shipping companies being linked to human trafficking, because the movement of goods and passengers often takes place along the same road, sea, and air networks as human trafficking. Transport and logistics also rely on large, generally low-skilled workforces and often use recruitment companies to find employees. Risks associated with these labour agencies/providers, particularly if they are not properly vetted, include that workers could have their passports confiscated or wages withheld.

3.4 Sourcing from countries with increased risk of human rights and environmental protection violations, including risk of modern slavery

We are operating in, and/or sourcing from countries where the risk of human rights violations, including modern slavery, can be particularly high. This includes countries such as China, India, and Pakistan, where local laws and regulations may not fully



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address critical human rights considerations. We identify and approach our tier-1 suppliers in countries with high human rights risk exposure by using a multi-step identification and prioritising process, which is compliant with the requirements of the German Supply Chain Due Diligence Act (GSCA).

We applied in the Nordex Group's Sustainability Statement 2025 the European Sustainability Reporting Standards (ESRS) methodology for the identification of impacts, risks, and opportunities in our supply chains. The Sustainability Statement, as an integrated part of the Nordex Group Annual Integrated Report 2025, was successfully externally audited against the reporting requirements of the EU Corporate Sustainability Reporting Directive (CSRD).¹ It provides an overview of the identified risks related to workers in the supply chain:

S1 OWN WORKFORCE

Category	Sub-topic	IRO ID	IRO	Value chain location	Time horizon
Positive Impacts	Working conditions	S1-I-001	(A) Fair Working Conditions and Rights Promoting fair working conditions and rights protection through transparent practices, equitable compensation, and strong labor representation aligned with international standards.		
	Working conditions	S1-I-002	(A) Employee Well-Being and Engagement Enhancing employee well-being and engagement through flexible work models and comprehensive health initiatives that foster a healthy and supportive work environment.		
	Working conditions	S1-I-003	(A) Employee Representation Improving employee satisfaction and rights protection by ensuring freedom of association, labor rights, and equality through works councils and collective agreements.		
Negative Impacts	Working conditions	S1-I-004	(P) Workplace accident and safety impacts Potential workplace accidents and injuries represent a possible negative impact, particularly in new projects where new employees and subcontractors need to be familiarized with the safety standards.		
	Equal treatment and opportunities for all	S1-I-005	(A,P) Unequal treatment and workplace inclusion impacts Potential and actual disadvantages and unequal work environment due to issues related to gender pay inequalities, lack of career advancement, harassment and barriers for disabled employees.		
	Other work-related rights	S1-I-006	(P) Potential labor rights violations Labor rights violations may potentially occur, including child and forced labor, or inadequate accommodation for mobile workers, which could affect their living conditions.		

Classification of the impact: (A) actual (P) potential
 Location in the value chain: ●-○-○ upstream ○-●-○ own operations ○-○-● downstream
 Time horizon: ■-□-□ short-term □-■-□ medium-term □-□-■ long-term

Figure 1 - Nordex SE Annual Integrated Report 2025, p. 94



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S2 WORKERS IN THE VALUE CHAIN

Category	Sub-topic	IRO ID	IRO	Value chain location	Time horizon
Negative Impacts	Working conditions	S2-I-001	(P) Human rights violations in high-risk regions Unintended support of human rights violations in the value chain may be possible, including potential exploitative practices and restrictions on freedom of association in high-risk regions.	●—○—○	■—■—□
	Working conditions	S2-I-002	(P) Unstable working conditions and inadequate wages Creating unstable working conditions due to short-term orders may be possible and could lead to excessive overtime and inadequate wages, primarily affecting workers in the upstream value chain.	●—○—○	■—□—□
	Working conditions	S2-I-003	(P) Unsafe working conditions in the supply chain Unsafe working conditions and inadequate safety could arise due to insufficient training and temporary employment.	●—○—○	□—■—□
Risks	Working conditions, Other work-related rights, Equal treatment and opportunities for all	S2-R-004	Penalties due to value chain labor conflicts Penalties may arise from potential noncompliance with legal due diligence obligations in areas such as minimum wages, equality, health and safety, as well as child and forced labor.	●—○—○	□—■—□
	Working conditions	S2-R-005	Community consent gaps stall projects Labor conflicts and rising wages in the value chain can cause supply disruptions and increase financial pressures, affecting long-term profitability.	●—○—○	□—■—■
Opportunities	Equal treatment and opportunities for all	S2-O-006	Supplier collaboration improves quality Enhancing supply quality through knowledge transfer and close collaboration with suppliers can improve product quality and strengthen business relationships.	●—○—○	□—■—□

Classification of the impact: (A) actual (P) potential

Location in the value chain: ●—○—○ upstream ○—●—○ own operations ○—○—● downstream

Time horizon: ■—□—□ short-term □—■—□ medium-term □—□—■ long-term

Figure 2 - Nordex SE Annual Integrated Report 2025, p. 122

Referring to this overview, we state in our Sustainability Statement that:

We conducted a comprehensive analysis of all countries in which we operate, as mandated by the German Supply Chain Act (GSCA). This analysis included an assessment of potential human rights risks, particularly in countries such as China, India, and Pakistan, where local laws and regulations may not fully address critical human rights considerations. Despite these increased risks, the Nordex Group has no indication that there were cases or high-risk instances of forced or child labor within our operations in these regions. Nordex remains committed to upholding the highest standards of human rights as outlined in our Human Rights Policy. We continuously strive to mitigate any potential risks through proactive measures and ongoing discussions about remedial actions.”²

4. ADDRESSING MODERN SLAVERY RISKS

As a global manufacturer of wind turbines, the Nordex Group sources products and services from numerous suppliers based throughout a wide range of countries and generates a significant share of value in our upstream production stages. The Nordex Group's Global Sourcing Department ensures that the required products and services are sourced in the right quality, at the right time, and at the right cost. As a core principle of our commitment to sustainability, the Nordex Group sees it as vital to ensure that our own environmental and social standards are maintained throughout our supply chain.

In the 2024 reporting year, the Nordex Group further continued and formalised the implementation of policies and practical measures to address the relevant risks in our operations and supply chain, including the avoidance of unintended support of exploitative working relationships, which was mentioned in the Sustainability Statement 2024 (see Figure 2 above). Our progress in respect of these actions is described below.

4.1 Current human rights initiatives

We have implemented risk management processes to ensure compliance with the GSCA. This law establishes binding legal obligations related to the protection of human rights, including the absence of any form of forced labour and modern slavery within the Nordex Group and its supply chains. Our approach is due diligence based and considers the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. This approach gives us a methodological framework for analysing, understanding and addressing our supply chain's risks. The GSCA-driven risk management approach enables us to take appropriate prevention measures in case of high risk of human rights violations, and to take mitigation measures where necessary.

In 2025, we started to implement an integrated supplier management software, and to set-up software support for our supply chain human rights risk analysis. These measures will help us to refine our analysis and deepen our insights of human rights and environmental risks in our supply chain.

We published the Forced Labour and Modern Slavery Policy on 1 January 2025. It describes the Nordex Group's aim and objectives in eliminating any form of forced

² Nordex SE [5](#), p. 99.



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labour and modern slavery within Nordex Group, at its partner organisations, and in its value chain. It applies to all employees of the Nordex Group in any capacity and location, and to subcontractors, suppliers and partner organisations of the Nordex Group or any of its agencies. It's development process builds on the learnings and the contents from several regional modern slavery statements, including the Nordex Oceania Modern Slavery Statements. The Forced Labour and Modern Slavery Policy applies to the whole of the Nordex Group.

The Nordex Group's measures related to human rights risk management apply both internally within the Nordex Group as well as within the supply chain, and are communicated both to our employees as well as to suppliers and relevant business relationships.

Our human rights e-learning training to those of our suppliers who were identified as having an increased risk of violating human rights has been continuously applied since 2024, and includes forced labour and modern slavery topics. In 2025, this training was made available to Nordex staff on a voluntary basis. The training was mandatory for functions which are directly linked with human rights.

4.2 Code of Conduct for Employees

We uphold human rights globally in all our relationships. The Nordex Group Code of Conduct for Employees is our legal and ethical compass for doing the right thing, in the right way, at the right time, in all our activities and relationships.

As a shared yardstick for responsible conduct, our Code of Conduct for Employees is our guide to the principles, standards, and ethical expectations of the Nordex Group and addresses the company's main compliance risks, such as in the field of business relationships. It is the core document that sets out our top-level binding corporate rules. The Code of Conduct for Employees is binding on all employees, managers, executives and directors of the Nordex Group.

The Nordex Group's robust corporate governance provides a clear framework that defines our role and empowers us in our responsibility to uphold our standards every day and in every situation – to support each other, to protect ourselves and the Nordex Group, to create ethical relationships, and to be committed to society and the environment. The Code of Conduct for Employees includes a specific section for Human Rights and our Human Rights Policy.

As stated in the Code of Conduct for Employees, and in line with the United Nations Guiding Principles on Business and Human Rights (UNGPs), we are committed to the United Nations Universal Declaration of Human Rights, the International Labour Organisation's (ILO) core labour standards, and the ILO's Declaration on the Fundamental Principles and Rights at Work. All our business decisions and activities are based on our strict compliance with laws and regulations, as well as our strong company values.

4.3 Code of Conduct for Contractors and Suppliers

In addition to the Code of Conduct for Employees, the Nordex Group has a Code of Conduct for Contractors and Suppliers under which we expect its target group to adhere to the principles of integrity and ethical, lawful conduct throughout the entire



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duration of their business relationship with us. Our Code of Conduct for Contractors and Suppliers defines our labour and human rights expectations and requires full compliance with them.

Our suppliers and contractors are required to commit to complying with the Code of Conduct in writing. In agreeing to it, suppliers and contractors commit to prohibit and refrain from using any kind of child labour, as well as not to use compulsory, forced or prison labour, or any kind of slavery.

The Code of Conduct for Contractors and Suppliers also requires that suppliers and contractors ensure compliance with these principles in their own supply chains.

We are in an ongoing process to amend our supplier contracts to include additional clauses requiring strict compliance with the Nordex Group's Supplier Code of Conduct. These amendments provide Nordex with the right to audit suppliers' compliance with the Code of Conduct, as well as termination clauses in cases of suppliers' non-compliance with the Code of Conduct. For all wind farm related suppliers, it is a mandatory requirement for them to return a signed copy of the Code of Conduct to Nordex before they can be onboarded as a supplier within Nordex's systems.

4.4 Whistleblower System

Every single person has a role to play in promoting ethical behavior and fighting against criminal offences, corruption, fraud, human rights or environmental violations at all levels of society.

Committing to a speak-up culture, since 2018 the Nordex Group maintains the Whistleblower System "*notify!*" based on principles of trust, confidentiality, good faith, impartiality, and protection, with the purpose of encouraging and facilitating the reporting. It explicitly mentions on its online portal that it gives the opportunity to report potential cases of forced labour and modern slavery.

The system meets all requirements of the GSCA.³In 2025, a total of 150 compliance reports were received via "*notify!*"; however, none were related to forced labour or modern slavery.

Nordex Group employees, our business partners' employees, and the general public can use the "*notify!*" whistleblower system to report any suspected compliance violation in connection with the Nordex Group's business activities, including human rights violations.

The Nordex Group does not tolerate or condone the abuse of human rights in any part of our business or supply chains. All allegations of abuse are taken seriously, and we work to effectively remedy any incidence of human rights abuse using our internal grievance mechanisms. We are committed to ensuring protection of retaliatory measures and actions for the whistleblower reporting in good faith.

The Whistleblower System comprises three reporting channels: direct contact with Corporate Compliance department, an [internet-based reporting platform](#), and a central helpdesk accessible via telephone hotline, email, or postal address. Reports can be submitted anonymously wherever this is not restricted by country-specific regulations.

³ For details see the publicly available [Rules of Procedure for the Complaints Procedure pursuant to the GSCA](#).



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We follow up every report confidentially, independently and competently. The reports are managed through a standard process for validation, investigation and conclusion. First the information is validated in an objective and confidential manner to ensure sufficient understanding of the issue and to check the plausibility. If required, immediate actions are taken to address any urgent threat situation. Our Corporate Compliance department evaluates the case and reports it to the Business Ethics Committee which as a steering committee determines whether an investigation is needed and the responsible function to be involved. Once the investigation is concluded, the relevant function elaborates a final report including the adequate corrective and/or preventive measures and follow up defined considering the confirmed compliance violation.⁴

The content and frequency of reports received are continuously monitored to ensure the effectiveness of the whistleblower system and to support the ongoing improvement of our compliance practices.

We inform our Management and Supervisory Board on a regular basis about the reports received, and their status and resolution.

The Nordex Group continues to strengthen internal awareness of the whistleblower system through ongoing communication initiatives, targeted employee training programs, and in-person visits to various countries conducted by the Corporate Compliance department.

4.5 Training and communications

Experts from the Nordex Group People & Culture and Corporate Compliance departments support our employees and managers both by providing mandatory and voluntary training courses on values, policies, guidelines and our Code of Conduct, and by providing advice on a case by-case basis. Additionally, in-person country training programs include awareness regarding the whistleblower system.⁵

We actively promote awareness of the Whistleblower system through targeted communication actions, including but not limited to intranet publications and the display of informative posters around Nordex's offices, to ensure all employees are informed and encouraged to use this channel responsibly.

4.6 Due diligence processes

Our processes for due diligence in the supply chain, and in our own operations, build on the OECD due diligence approach for responsible business conduct. While this approach was underlying the development of the refined due diligence processes in the supply chain, we are currently revisiting the related processes for our own operations, to understand if there is potential for improvement.

⁴ For details on the functioning of the Whistleblower System see publicly available [Nordex Group Integrated Report](#).

⁵ For information on compliance trainings see publicly available [Nordex Key Facts of Sustainability 2025](#), p. 24.



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5. EFFECTIVE ACTION TAKEN TO ADDRESS MODERN SLAVERY AND PLANS FOR THE FUTURE

Whilst the Nordex Group has had no incidents of modern slavery reported or identified through our current risk management systems so far, we recognise the continuing need to develop better processes to identify, prevent and mitigate any such risks.

5.1 The actions implemented in the previous 12 months include:

- Publication of the Forced Labor & Modern Slavery Policy of the Nordex Group.⁶
- Review of the efficiency of measures across the Nordex Group which address compliance with the GSCA.⁷
- Development of the new Sustainability Strategy of the Nordex Group, which will include several internal initiatives the strengthen human rights due diligence, and which entered into force in Q1 2026.
- Conduct of the annual analysis of the GSCA related risks in the supply chain and the Nordex Group's own workforce.
- Training program on protection of Human Rights continued for selected suppliers.
- Updating supplier contracts with human rights-protection related amendments started.

5.2 Our ongoing actions include:

- Communication of the policies and procedures regarding the Nordex Group's human rights related goals and expectations, including raising awareness of the Nordex Group Policy on Forced Labor & Modern Slavery.
- Alignment of the Nordex Group's supplier audit programme with results of the supply chain risk analysis, and with further supplier management activities, including the integration of human rights related aspects into the supplier quality audits, such as methods of identifying exploitative labour practices.
- Development of a training course to raise our employees' awareness for human rights, including abusive working practices, by building on the training program for suppliers.
- Continuous improvement of monitoring, tracking, and reporting on our efforts and the progress we make.
- Roll-out of internal initiatives to implement the new Sustainability Strategy.

6. CONSULTATION

The Nordex Group operates globally as a matrix organisation with strong centralised corporate functions, global policies, and a high level of sharing of expertise, technology, and human and financial resources between companies within the group. The contents of this Modern Slavery Statement, and the measures described in this document, have been prepared and developed by the Nordex Group's global sustainability department, which is responsible for coordinating modern slavery topics within the wider Nordex Group.

⁶ Available here: Microsoft Word - Forced Labor & Modern Slavery Policy - final for signature

⁷ For approach and results see the publicly available [5](#).



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This Statement was approved by the board of directors of Nordex Oceania on
26.06.2026 | 12:18 CEST.

Signed by:

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Alberto Pérez Couso

Managing Director, Nordex Oceania Pty Ltd

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Victor Equisoain

Director, Nordex Oceania Pty Ltd

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José Luis Blanco

CEO, Nordex SE

Signed by:

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Dr. Sandra Pfeiffer

Director, Global Sustainability