

Siemens Energy Pty Ltd

ACN 636 537 409

Modern Slavery Statement
for the Reporting Period to 30 September 2024



[siemens-energy.com/sustainability](https://www.siemens-energy.com/sustainability)

1. Reporting Entity

This Modern Slavery Statement is made in accordance with the requirements of the *Modern Slavery Act 2018* (Cth) by Siemens Energy Pty Ltd ACN 636 537 409 with its registered office at 885 Mountain Highway, Bayswater, Victoria 3153, Australia. The statement covers the reporting period for the financial year ended 30 September 2024.

Siemens Energy Pty Ltd is a large proprietary company which is part of the Siemens Energy group of companies ultimately owned by Siemens Energy AG (*Siemens Energy Group*).

At Siemens Energy, our mission is to support our customers in transitioning to a more sustainable world based on our innovative technologies and our ability to turn ideas into reality. Our portfolio, extensive energy experience, and ambition to decarbonize the world's energy systems reflect this.

The United Nations' Sustainable Development Goals (SDGs) guide and inspire us to maximize the impact of our effort. We have identified five SDGs as key focus areas. In particular, we address SDG 8, "Decent Work and Economic Growth," through the innovative power of our global operations, which stimulate economic development in many countries and create decent, future-proof jobs.

As a globally operating company, we are aware of the impact our business has on people around the world, especially from our large-scale energy projects. We are dedicated to responsible business conduct and committed to ensuring respect for human rights within our spheres of influence. Identifying and managing our human rights impacts and mitigating risks along our entire value chain is therefore imperative.

Dimensions of human rights



The Siemens Energy Group Compliance Officer, who is also the Human Rights Officer, monitors human rights compliance and reports to the Executive Board at quarterly Compliance Review Board meetings and on an ad hoc basis.

The Siemens Energy Policy Statement on Respect for Human Rights and Environmental Protection is published on the global Siemens Energy website. It has been communicated to our employees, thus further raising awareness for human rights.

Our actions go beyond compliance with applicable laws and regulations, since they are based on our commitment to the following conventions and principles:

- **International Bill of Human Rights**, consisting of:
 - › Universal Declaration of Human Rights
 - › International Covenant on Civil and Political Rights
 - › International Covenant on Economic, Social, and Cultural Rights
- **European Convention on Human Rights**
- **ILO (International Labour Organization) 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**, 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** (UNGPs)
- **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

2. Structure, Operations and Supply Chain

Structure

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

Siemens Energy Pty Ltd mainly carries on business in Australia, however, it is also registered as a foreign company in New Caledonia (1 465 863 R.C.S. Noumea), as an overseas company in New Zealand (7875745), and as an overseas company in Papua New Guinea (3-127175). From time to time the entity does minor and infrequent work in Fiji. The operation is predominantly office and project site based.

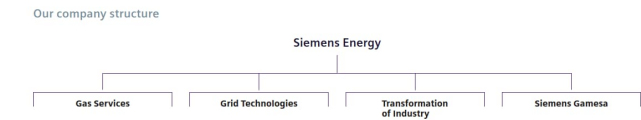
As of September 30, 2024, the Siemens Energy Group had about 99,000 employees worldwide. Locally, Siemens Energy Pty Ltd employed 311 permanent and around 300 casual staff.

The Siemens Energy Group currently maintains, protects, and owns a large number of trademarks. Most products and services sold by Siemens Energy Pty Ltd use the trademark Siemens Energy or Siemens (under licence from Siemens AG), however, some products have legacy brand names acquired over time including but not limited to Dresser-Rand (compressors, steam and gas turbines) and Rolls-Royce (aero-derivative gas turbine and compressors).

Operations

The Siemens Energy Group is one of the largest providers of advanced technology in the energy and electricity sector, committed to supporting the full spectrum of the global energy market. Our comprehensive portfolio of products, solutions, and services spans nearly the entire energy value chain – from low- or zero-emission power and heat generation, transmission, and storage to reducing greenhouse gas (GHG) emissions and optimizing energy consumption in industrial processes. In addition, we provide a robust range of training and service offers, reinforcing our dedication to a more sustainable energy future.

Since the start of fiscal year 2023, Siemens Energy has been strategically aligned on a global basis into four business areas: Gas Services (GS), Grid Technologies (GT) and Transformation of Industry (TI) and Siemens Gamesa.



- Gas Services (GS)** bundles all business activities related to gas turbines, large steam turbines, large generators, and heat pumps, including auxiliaries, instrumentation, and controls. The portfolio includes products, solutions, and services for central and distributed power generation. GS supports its customers all the way from installing new units to servicing the installed fleet, with a comprehensive service portfolio that covers maintenance services, modernization and upgrades, operations services, digitalization services (e.g., cyber security), and professional consulting.
- Grid Technologies (GT)** focuses on increasing connectivity, resilience, digitalization, and decarbonization of power grids all over the world. Through its products, systems, solutions, and services, GT enables transmission grids to cope with growing energy demands and the increasing complexity of grid infrastructures resulting from the integration of renewables. Its portfolio includes high-voltage direct current transmission

systems, offshore windfarm grid connections, flexible AC transmission systems, high-voltage substation solutions and products, air- and gas-insulated switchgear, transformers, storage solutions, as well as digital and service offers.

- Transformation of Industry (TI)** comprises four non-reportable operating segments – Industrial Steam Turbines & Generators (STG), Compression (CP), Sustainable Energy Systems (SES), and Electrification, Automation, Digitalization (EAD) – that are presented voluntarily as if they were a single reportable segment. TI supports industrial customers in reducing their carbon footprint and achieving their individual decarbonization targets. Its portfolio includes products (e.g., compressors, steam turbines, generators, automation systems, sensors, and electrolyzers), digital offers (e.g., remote monitoring), integrated systems and solutions, and services (e.g., field service, modernization and upgrades) for various process industries and the maritime sector.
- Siemens Gamesa** offers onshore and offshore wind turbines as well as services over the entire wind turbine life cycle. In Australia, Siemens Gamesa currently operates its business through a separate legal entity (Siemens Gamesa Renewable Energy Pty Ltd) and reports separately. It is anticipated this will be integrated in the future.

Supply Chain

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

The products we sell are sourced from all over the globe with Siemens Energy Group’s factories being the biggest supplier of products to Siemens Energy Pty Ltd by value. Source locations include Europe, North America, and Asia.

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 also located in Europe, North America and Asia and from other suppliers.

Depending on the nature of the supply of products and services, Siemens 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 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 Energy Pty Ltd include services performed by low-skilled workforces, such as cleaning and manual labour, where there may be a risk of migrant labour exploitation (minimum wages may not be paid), or where excessive or unreasonable hours might be expected of supplier’s employees. We consider these risks to be low in our business.

Supply risks of modern slavery practices identified by Siemens Energy Pty Ltd include:

- Purchasing goods and services from suppliers operating in higher-risk locations
- Health and safety risks to our suppliers’ workers
- Procurement of products that may have conflict mineral content such as electronics
- Sourcing of uniforms and personal protective equipment (PPE), as the manufacturing process has been susceptible to modern slavery in the past.



Cornerstones of our risk analysis system



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

Business Conduct Guidelines

Commitment to respecting human rights is anchored in the Siemens Energy Group Business Conduct Guidelines (BCG) which are binding for all executives and employees worldwide. To enforce the BCG commitment, employees are trained in the respective requirements of the BCGs and are requested to acknowledge them as part of their conditions for employment.

Siemens Energy is committed to safeguarding the fundamental rights of employees. This includes adhering to all applicable working-hours regulations around the world, ensuring adequate compensation, upholding the freedom of association and collective bargaining, and maintaining zero tolerance for discrimination or harassment.

Supply Chain Management

The sustainability of our operations depends also on the Siemens Energy Group’s approximately 30,000 suppliers in 139 countries around the world. With a global procurement volume of €23.5 billion in fiscal year 2024, it is crucial that we manage our supply chain in a sustainable, transparent, and responsible way.

Binding Code of Conduct for Suppliers

All suppliers and third-party intermediaries of Siemens Energy must sign the Code of Conduct (CoC) for Suppliers and Third-Party Intermediaries. The CoC is based on the Business Conduct Guidelines (BCG) and Principles of the UN Global Compact (UNGC).

The CoC requires specific environmental, compliance, and labour standards to be established across all countries of

operations. It includes all aspects of the German Supply Chain Due Diligence Act and covers the following topics:

- **Human rights:**
 - › Prohibition of forced labour
 - › Prohibition of child labour
 - › Non-discrimination and respect in employment
 - › Freedom of association and collective bargaining
 - › Working hours & wages for employees
 - › Life, health, and safety of employees
 - › Impact on communities
 - › Security forces
- **Environmental & climate protection, protection of natural resources**
- **Fair operating practices:**
 - › Anti-corruption and bribery
 - › Fair competition, antitrust laws, and intellectual property rights
 - › Conflicts of interest
 - › Anti-money laundering, terrorist financing
 - › Data privacy and cybersecurity
 - › Foreign trade regulations
- **Responsible minerals sourcing**
- **Grievance mechanism**
- **Compliance with the CoC principles in the supply chain of the supplier**

The Siemens Energy’s supply chain management is overseen by the global Head of Procurement, who reports to the Executive Board. The approach includes fostering compliance and sustainability along the entire supply chain.

Sustainability Self Assessments

The Siemens Energy Group uses sustainability self-assessments (SSAs), covering all major aspects of the CoC, as part of the supplier qualification process that is regularly reviewed and updated as necessary to reflect new standards and regulations.

Potential new suppliers undergo a qualification process, while existing suppliers are re-evaluated every three years.

In fiscal year 2024, the number of SSAs conducted globally were 4,300. Furthermore, quality audits are conducted that include questions about sustainability, covering major aspects and requirements of the CoC. In fiscal year 2024, we conducted 546 on-site audits worldwide. The differences between 2024 and 2023 are mostly due to internal reorganisation and process changes.

Sustainability self-assessments (SSAs) ¹	Fiscal year	
	2024	2023
Number		
Europe, C.I.S. ² , Africa, Middle East	2,288	3,604
Americas	1,047	1,442
Asia, Australia	965	1,773
Total	4,300	6,819
Improvement measures ³ agreed upon		
Legal compliance/prohibition of corruption and bribery	1,066	1,407
Respect for the basic human rights of employees	221	667
Prohibition of child labor	0	0
Health and safety of employees	1,105	1,393
Environmental protection	1,526	1,940
Supply chain	364	1,110
Responsible minerals sourcing	140	161
Total	4,422	6,678

¹ Siemens Energy (excluding Siemens Gamesa): To be conducted by all newly onboarded suppliers with a purchasing volume > €10,000 p.a.; Siemens Gamesa: To be conducted mainly by suppliers from non-OECD countries (referred to as high-risk suppliers). Questionnaires initiated and completed in the year under review.

² Commonwealth of Independent States.

³ Improvement measures agreed with suppliers relate either to actual deviations from the Code of Conduct for Suppliers and Third-Party Intermediaries or to structural improvements to management systems and a lack of specific processes and guidelines at the supplier.

External Sustainability Audits (ESAs)

The Siemens Energy Group sees external sustainability audits (ESAs) as an effective means of reviewing our suppliers’ sustainability performance. Focusing on quality and objectivity, external audit partners conduct the ESAs.

We assign repeat or follow-up audits if necessary. In fiscal year 2024, Siemens Energy group conducted 152 ESAs and accepted 754 ESAs and equivalent assessments of suppliers that were conducted by other companies and that confirm the supplier’s management system. Only assessments that fulfill our requirements are accepted and where the full audit documentation is provided to us.

External sustainability audits (ESAs)	Fiscal year	
	2024	2023
Number		
Europe, C.I.S. ¹ , Africa, Middle East	73	77
Americas	16	21
Asia, Australia	63	96
Total	152	194
Improvement measures ² agreed upon		
Legal compliance/prohibition of corruption and bribery	548	941
Prohibition of forced labor	20	33
Prohibition of child labor	26	23
Health and safety of employees	704	811
Environmental regulation	42	39
Supply chain	97	97
Unfair remuneration	450	529
Collective bargaining	21	9
Discrimination	37	26
Land rights	0	0
Harmful pollution	41	10
Security forces	0	0
Total	1,986	2,518
Accepted ESAs and equivalent assessments	754	71

¹ Commonwealth of Independent States.

² Improvement measures agreed with suppliers relate either to actual deviations from the Code of Conduct for Suppliers and Third-Party Intermediaries or to structural improvements to management systems and the lack of specific processes and guidelines at the supplier.

supplier in our global supplier base. As a risk-based approach, the mid-term goal is to cover 80% of our total sustainability risk score within five years. For this fiscal year, we aimed to cover 40% of our total sustainability risk score and achieved a coverage rate of 44.5%.

Throughout the supplier assessment processes, we remain committed to the partnership with our suppliers and to helping them improve. However, if problems persist and/or the suppliers do not show a willing-ness to take necessary corrective action, we remove them from our list of approved suppliers. All local instances of blocked suppliers are reported to Corporate Procurement, which discusses and decides on the need for a worldwide block. In fiscal year 2024, no supplier was dismissed, since all suppliers with negative results are collaborating and implementing corrective actions.

In addition to the processes described above, we have a Central Warning Message system in place. This facilitates a fast, efficient response to violations of the CoC requirements. The responsible procurement departments at Siemens Energy are authorized to agree on a series of remedial steps with the supplier. Potential misconduct can be reported via the whistleblower hotlines “Speak Up” at Siemens Energy. A global training campaign is used to inform Siemens Energy employees and suppliers.

Responsible minerals sourcing

The Siemens Energy Group is committed to preventing the use of minerals from conflict-affected and high-risk areas in the supply chain, in accordance with the risks defined in Annex 2 of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. To this end, we have adopted a Responsible Minerals Sourcing Policy to provide a consistent, company-wide standard for supply chain management. To determine the use, source, and origin of these minerals in our supply chains, we investigate the smelters involved. The Siemens Energy Group is part of the steering committee of the Responsible Minerals Initiative (RMI), which provides an assessment program for smelters, the Responsible Minerals Assurance Process.

When surveying the group's approximately 1,300 relevant suppliers, the Siemens Energy Group uses the RMI's Conflict Minerals Reporting Template to obtain the necessary information on smelters producing tin, tantalum, tungsten, and gold (3TG). Siemens Energy is actively involved in the Responsible Minerals Assurance Process by screening smelters for eligibility and encouraging uncertified smelters to take part in the RMI's assessment programs. All newly reported smelters are shared with the RMI.

Based on risk sources identified by the EU, which cover armed conflicts, weak governance, and human rights

Supplier sustainability risk score



To monitor overall performance, the Siemens Energy Group has implemented a new performance indicator that indicates the coverage rate of our total sustainability risk score in the supply chain, which is evaluated for our every

abuses, the Siemens Energy Group also conducts a specific mineral risk assessment to identify other relevant minerals apart from 3TG. Following cobalt, copper, rare earths, and mica, we added lithium, nickel, graphite, and iron ore to our supply chain due diligence processes according to the 5-step framework of the OECD Due Diligence Guidance. In addition to our RMI membership and strategic collaboration with the European Partnership for Responsible Minerals, where we chair the governance board, we are involved in Copper Mark, an assurance framework promoting the responsible production of copper.

Implementation in Australia

The Siemens Energy Group supply chain management processes and systems are implemented by Siemens Energy Pty Ltd. During the reporting period Siemens Energy Pty Ltd:

- continued to request its key suppliers to complete the SSA and/or review these suppliers' modern slavery statements where available
- continued to perform onsite and desktop Environment, Health, Safety and Quality (EHSQ) audits. These audits cover compliance with Siemens Energy's policies and processes with the focus being to check safe working conditions, environmental and quality issues. It is considered that the audit particularly of safe working conditions would detect modern slavery issues at supplier sites.

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.

Occupational Health & Safety

The Siemens Energy Group is committed to providing a safe and healthy working environment for all employees, business partners such as contractors, suppliers and future partners. With our occupational health and safety approach, we contribute to two SDGs: SDG 3 "Good Health and Well-Being" and SDG 8 "Decent Work and Economic Growth".

Our standards for environment, health and safety (EHS) are anchored in all our business practices and are aligned with our EHS Principles and Core Responsibilities as well as our Business Conduct Guidelines (BCG).

Channels for Reporting Misconduct

Reliable reporting channels for internal and external stakeholders and the protection of internal whistle-blowers from sanctions help ensure possible misconduct is reported, thoroughly investigated and clarified. Such channels include Managers, HR and Compliance departments and:

- "Speak Up" compliance reporting system (24 hour online or by telephone)
- The Siemens Energy Ombudsperson

Information on possible violations can be given confidentially and anonymously. We do not tolerate retaliation against complainants or whistleblowers, and any attempt at retaliation will be treated as a compliance violation. The same principles apply to any reports of wrongdoing brought forward by third parties.

Our Compliance department investigates relevant reports and takes appropriate action in accordance with formal company-wide processes.

5. How we assess the Effectiveness of these Actions

Siemens Energy Pty Ltd uses the following mechanisms to assess the effectiveness of actions taken:

We conduct 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.

This is supplemented by cross-functional reviews between the 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. 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 Energy Pty Ltd does not own or control any entities however this statement is aligned with the Siemens Energy Group Sustainability Report 2024 and the actions outlined in that report to address Modern Slavery Risks. As stated above these include globally mandated processes and practices applicable to all Siemens Energy

Group companies including Siemens Energy Pty Ltd (noting that Siemens Gamesa Renewable Energy Pty Ltd currently files a separate modern slavery report).

7. Any Other Relevant Information

The Siemens Energy Group's commitment to sustainability and its contribution to the United Nations' Sustainable Development Goals (including sustainable supply chains and human rights) are set out in the Siemens Energy Sustainability Report 2024 [Sustainability at Siemens Energy \(siemens-energy.com\)](#) and Sustainability in the Supply Chain (<https://www.siemens-energy.com/global/en/home/supplier/sustainability-in-the-supply-chain.html>).

7.2. Further detail regarding the Siemens Energy Group Compliance program, its Human Rights Policy Statement and FY 2024 Report on the German Supply Chain Due Diligence Act please refer to [Compliance \(siemens-energy.com\)](#).

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

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Samuel Morillon

Managing Director and CEO

Signed by:

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Felice Michael Bertolotti

Director and CFO