

MARCH 2025

# Modern Slavery Statement

**SIEMENS**

## About this statement

Siemens AG, as a global company, are well aware of our responsibility to society. Siemens Australia are unreservedly committed to safeguarding and respecting human rights in every stage of the value chain and understand this to be a key element of acting with integrity and responsible corporate governance. Our goal and aspirations are to identify any human rights violations occurring anywhere in our value chain as early as possible and to mitigate identified risks responsibly.

The Siemens group recognises establishing sustainability in the supply chain as a key company policy and responsibility to jointly work for a better life for all who take part in our interconnected world - with no place for forced labour, slavery, and human trafficking in any form.

As part of the worldwide Siemens group of companies, sustainable practices are firmly anchored in our corporate culture, based on our company values – responsible, excellent, and innovative. We apply globally binding principles that require all staff to behave in an ethical, law-abiding manner. We act responsibly to support economic, environmental, and social progress. We have the same expectations of our customers and supply chain.

This statement is in accordance with the Modern Slavery Act 2018 (Cth) (the **Act**) and relates to the specific reporting entity, Siemens Ltd (ACN 004 347 880), a public company incorporated in Australia with its registered office at 885 Mountain Highway, Bayswater, Victoria 3153 (**Siemens Australia**). This statement covers Siemens Australia's financial year ending 30 September 2024.



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**Acknowledgement of Country**

Siemens Australia acknowledges Aboriginal and Torres Strait Islander peoples as the Traditional Custodians of our lands. We pay our respects to their Elders past, present and emerging. They are the keepers of the memories and traditions, and an integral part of the foundation on which we all build together.

Our vision for reconciliation <https://www.siemens.com/au/en/company/about/innovate-rap.html>

# FY 2024 in review

*Modern Slavery involves the serious exploitation of humans and Siemens Australia recognises its responsibilities to take appropriate action.*

Our statement details our operations, and supply chains and transparently outlines our approach to assess, prevent and mitigate Modern Slavery risks. We recognise that Modern Slavery is an evolving and ever-changing topic, so our approach is to sustainably implement value added controls and invest in tools and resources to provide quality on-demand reporting to our supply chain and operations. At Siemens, we take responsibility for the role we play to combat Modern Slavery.

We are not aware of any cases of child or forced labour among our own employees globally, and no instances of Modern Slavery in our Supply Chain. This includes detected and/or reported, in fiscal year 2024.

## During FY 2024 our actions included:

- On-going evaluation of our suppliers.
  - the Supplier Registration and Qualification processes that our systems monitor to ensure suppliers undertake the required tasks and alert us when there is possible non-compliance,
  - Working with our suppliers to ensure they meet the requirements of our Code of conduct,
  - Desktop audits of medium and high-risk suppliers.
- Modern Slavery working group.
  - The Modern Slavery working group collaboratively reviews our progress, identifies new areas of risk and aligns mitigation strategies,
  - Modern Slavery best practice, guidance and legislation were reviewed to ensure the risk in this rapidly and evolving topic, continue to be addressed.
- The inclusion of Human Rights into the Siemens Business Conduct Guidelines.
  - Siemens is committed to responsible and ethical business conduct – beyond compliance with laws and regulations. Globally all Siemens business partners, stakeholders and employees are required to agree and abide by our Business Conduct Guidelines.
- Siemens was a participant in the United Nations Global Compact.
  - Its ten principles and the Global Industrial Union framework agreement are binding on the company globally.

## Summary of the FY 2024 Supply Chain

Over half of what we source, comes from Siemens factories around the world - largely Germany and China. This is predominately due to the majority of Siemens equipment we sell being manufactured by other Siemens entities globally, and not manufactured locally by Siemens Australia.

Outside of Siemens factories, most of what we procure comes from third party suppliers within Australia, which we engage through various contractual arrangements, such as single transactions or under long term supply frameworks, depending on the nature of purchase. Our investigations during this reporting period found:

- Siemens Australia engaged directly with under 800 suppliers from fewer than 50 different countries
- Our top 3 countries of supply account for just over 70% of our procurement spend and relates to suppliers in Netherlands, Australia and Germany.
- Over 70% of our supply chain is sourcing goods and services from Siemens factories and Siemens companies.
- Of our third-party supplier spend, nearly 86% of this relates to suppliers within Australia.
- The majority of our suppliers can broadly be defined to fall into the following categories of services and products:
  - electrical and electromechanical products and equipment
  - facilities and property, and
  - subcontractors.

# Our structure, operations and supply chain

## **The Siemens ecosystem**

Siemens Australia is ultimately owned by Siemens AG and is part of the Siemens global ecosystem and has been active in Australia, New Zealand, and the Pacific region since 1872.

Siemens AG is a technology company focused on industry, infrastructure, transport, and healthcare. From more resource-efficient factories, resilient supply chains, and smarter buildings and grids, to cleaner and more comfortable transportation as well as advanced healthcare, the company creates technology with purpose adding real value for customers. By combining the real and the digital worlds, Siemens group empowers its customers to improve their industries and markets, helping them to transform the everyday for billions of people.

Siemens also owns a majority stake in the publicly listed companies Siemens Healthineers, a globally leading medical technology provider shaping the future of healthcare. In addition, Siemens holds a minority stake in Siemens Energy, a global leader in the transmission and generation of electrical power. is a global technology powerhouse that has stood for engineering excellence, innovation, and quality.

In financial year 2024, the Siemens Group generated revenue of approximately AUD\$130.5 billion and employed over 327,000 employees worldwide. Siemens entities in the Pacific region, employed over 2,200 people.

This report focuses only on Siemens Australia which has two subsidiaries: Siemens Industry Software Pty Ltd (ACN 607 224 662), which is a non-reporting entity under the Act, and Siemens (N.Z.) Limited (NZCN 318303), which is incorporated and operates in New Zealand.

# Our values

## Sustainable Responsible Business Practices

As a global company, we are aware of our social responsibility and are fully committed to respecting Modern Slavery, for our entire value chain. Our holistic approach to Modern Slavery not only encompasses our own operations, but also takes into account our supply chain and customer related business activities. Siemens has a zero tolerance approach to any form of human rights violations, including forced labour, modern Slavery and child labour. We are committed to putting effective systems and controls in place to safeguard against any form of human rights violations taking place within our own operations and our company's value chain.

As part of our annual Modern Slavery reporting, we are determined to provide transparency of our progress with regards to our Modern Slavery activities. We provide disclosure on our risks, continuous improvement measures and our grievance mechanisms, to demonstrate our commitment.

Sustainability is our guiding principle, supporting us in our day-to-day work and ensuring our long-term growth. Both integrity and sustainability are closely linked to our three company values: responsible, excellent and innovate. Through sustainable development we make our contribution to a more equitable global economy and provide energy-efficient, durable products and solutions for our customers. In this way, we aim to live and breathe our socially responsible company culture – for the good of society.

Our pledge to safeguard human rights is anchored in our Siemens Business Conduct Guidelines (BCGs). The BCGs are binding on all employees and business partners worldwide. They set out the fundamental principles and rules that apply to our actions within our company and in relation to our customers, external partners, and the public. Siemens' vision is to create liveable communities, opportunities, equal chances for people as well as future-proof, healthy, safe and inclusive work environments.

We enable our partners and customers to improve people's lives today and transform the backbone of societies for a better tomorrow. For instance, our technologies support the well-being, productivity, safety and security of building tenants and operators. Similarly, in the field of mobility, passengers and operators benefit from greater safety and convenience thanks to our technologies. We also promote the socioeconomic development of communities, by enabling access to basic goods, affordable real estate, food and water, healthcare, education, and public transportation.



Siemens enable our partners and customers to improve people's lives today and transform the backbone of societies for the **better tomorrow**

## Caring for our people

At Siemens, equitable treatment and respect form the core of our value system. We foster diversity, inclusion, personal dignity, privacy and community development to create a sense of belonging to our people in a safe environment where our people can contribute their best.

Our workforce comprises predominately of highly skilled workers across Australia in office, manufacturing and project environments. Our workers are covered by industrial instruments including modern awards, enterprise agreements and individual employment contracts as well as having minimum level entitlements legislated within Australia by the Fair Work Act 2009 (Cth). When determining the remuneration of our employees, we analyse external market data in Australia, relevant to the specific role and the required qualifications, knowledge, and skills. And, on an annual basis, each employee's remuneration is reviewed, ensuring our employees meet or exceed minimum entitlements prescribed by the National Employment Standards.

We focus on matching the right candidates with job vacancies based on competency and experience and then upskilling and reskilling our people by supporting their willingness to experiment and learn, and to help them develop a personal growth mindset. We offer all our employees a flexible work policy and employees have access to Siemens employee share plans, to participate in Siemens' success also as a shareholder.

We provide to our employees (and their immediate family) access to counselling, coaching and support from qualified health professionals. This free and confidential service is available 24/7, with online tools and referral services included.

Our employees participate in the Global Employee Survey to provide valuable feedback on a diverse range of topics. We celebrate our people and achievements through various on-site and off-site events, including Family days at selected locations throughout Australia. We recognise the benefits of coming together to discuss mental health issues and we support various awareness and educational campaigns including Movember, R U OK, and others.

We do not tolerate discrimination, sexual or any other form of harassment, or inappropriate behavior toward individuals or groups. We have comprehensive policies and procedures to manage this including "Tell Us", which is an online tool that allows employees to raise concerns (anonymously, if they wish).





As part of the worldwide Siemens group of companies, sustainable practices are firmly anchored in our corporate culture, based on our company values – **responsible, excellent, and innovative.**

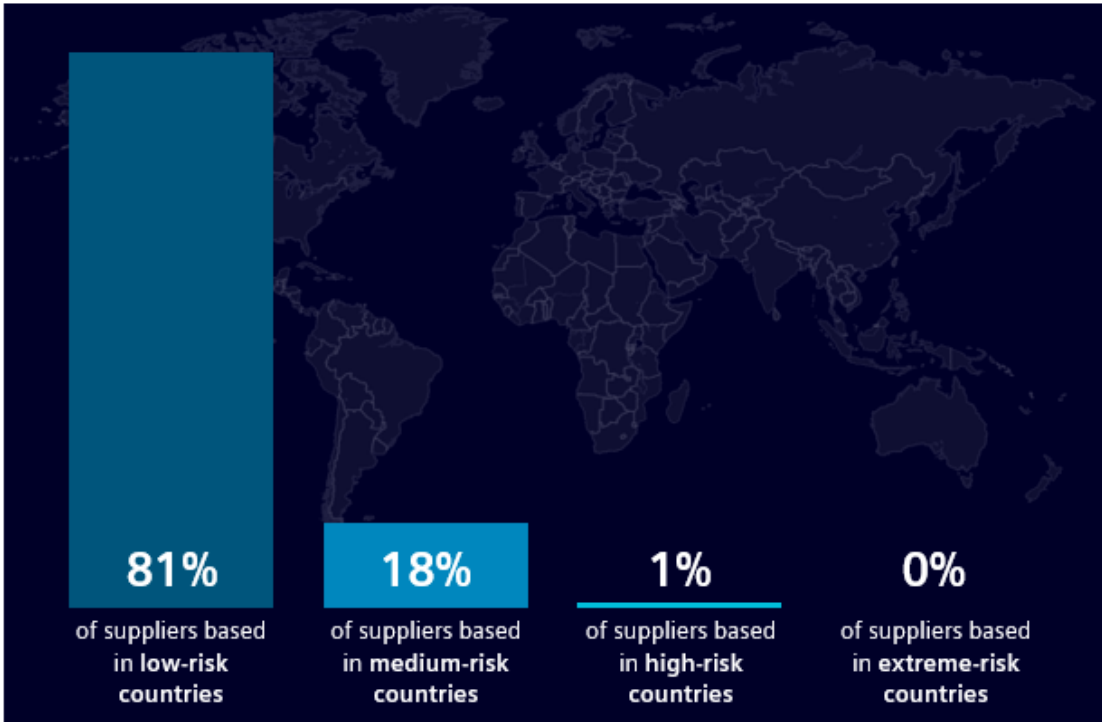
# Risks of Modern Slavery practices in operations and supply chain

**Process of identifying our supply chain risks**

To identify both geopolitical and sustainability risks across the supply chain, Siemens AG sources insights from Systain Consulting GmbH (**Systain**). Systain is a leading sustainability consultancy for companies across Germany, especially with regard to the supply chain. Systain produces sustainability risk ratings based on supplier country and covers legal compliance, human rights and labour practices, environmental protection, fair operating practices, responsible minerals sourcing and supply chain.

Siemens Australia used data from Systain to identify that approximately 81% of what we spend is with suppliers based in low-risk countries, with 18% based in medium risk countries and 1% based in high-risk countries (2% in FY 2023).

Over 60% of our spend in high-risk countries involved procuring through Siemens organisations. We reported no spend with suppliers operating in extreme risk countries in FY 2024 and in the prior 4 years since we began reporting on Modern Slavery data.



Data: Financial Year ending 30 September 2024.  
Includes: Third party, Siemens, and Siemens affiliated spend.

### **Assessing the Modern Slavery risks in our supply chain and operations**

We consider the risk of Modern Slavery in our direct business operations to be low and mitigated through our existing Governance Framework and processes.

Siemens recognises that we may be exposed to such risk, either directly or indirectly, particularly through our supply chain. Our focused due diligence assessments around identifying and understanding the potential context and scale of Modern Slavery risks related to our first-tier suppliers in FY24, has identified that Siemens Australia supply chain risks include:

#### **Suppliers operating in high risk countries, that we procured from in FY24:**

India, Turkey, Mexico, Vietnam, Indonesia, Sri Lanka, Philippines and Papua New Guinea.

#### **High risk Sectors and Industrys that we procured from in FY24:**

Including; electric and electronic products, hire of semi-skilled labour and materials used in manufacturing (i.e. copper, stone, earth etc)

#### **Hire of specialist skilled labour in high risk countries, that we procedured in FY24:**

Turkey, India and Mexico  
Papua New Guinea - Legal Services only

# Actions taken to address and assess Modern Slavery risks

## Governance framework

Siemens Australia has a governance framework in place, based on the global Siemens framework and local regulatory requirements, which underpins the way we engage with suppliers, business partners and the way we operate. Our integrated management system houses our policies and procedures, including those related to procurement, supplier management, BCG and our Code of Conduct guidelines.

To ensure that compliance and integrity are deeply anchored in the organisation, Siemens employees receive targeted risk-based training on compliance topics, including Modern Slavery. Employees are empowered to report potential compliance concerns, via various reporting channels including the Tell Us service.

## Modern Slavery Working Group

Siemens Australia Modern Slavery Working Group, including senior key cross functional stakeholders, was established to assess, identify, and mitigate the company wide Modern Slavery risks, and ensure continuous improvement. This working group will continue to collaborate, transform, and drive Siemens Australia's future Modern Slavery activities.



## Supply chain processes

We recognise that risk can be a rapidly and evolving topic. As part of our Modern Slavery actions, we identified areas for improvement to strengthen the way in which we engage with suppliers to address Modern Slavery risks. We have embedded a process to actively assess our suppliers prior to engagement, then continuously monitor our supply chain, ensuring we can effectively focus on emerging and current risks.

Our supplier risk management strategy can be broken down into process steps, which are supplier registration, supplier qualification and supplier monitoring. We then have a complementary Desktop monitoring activity.

# Supplier Registration

## 1 Siemens Group Code of Conduct for Suppliers and Third Party Intermediaries (Code of Conduct)

The Siemens Group Code of Conduct is based on the principles of the UN Global Compact relating to human rights, labour standards, environmental protection, and anticorruption initiatives. These principles are derived from the Universal Declaration of Human Rights, the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO) and the principles of the Rio Declaration on Environment and Development. To do business with Siemens Australia, all suppliers must accept and comply with our Code of Conduct.

## 2 Our standard purchasing terms

Our standard purchasing terms for suppliers include a Modern Slavery clause setting out obligations in regards to complying with Modern Slavery related laws and supporting us in managing and monitoring risks in the supply chain and are included as part of all purchasing activities.

**We take a continuous improvement approach to our supply chain processes and systems** to ensure our suppliers meet the necessary qualification requirements at any given time.

## Supplier Qualification

### **3** The supplier self-assessment process

Siemens Australia adopted the Siemens Group standardised Corporate Responsibility Self-Assessment (CRSA) questionnaire module as part of our existing supplier qualification process. The CRSA questionnaire is now mandatory for all third party suppliers who have or are expected to meet a defined threshold.

## Supplier Monitoring

### **4** The ongoing monitoring and risk assessment of the entire supply chain of Siemens Australia

Periodically we conduct a review of the entire supplier base (using the Sustain insights). This enables us to focus on emerging and current risks, and proactively work with our supply chain and/or take necessary actions.

Supplier management activities are centrally coordinated, which enables efficient exchange of information and digital collaboration with our suppliers via a secure portal. It covers all strategic procurement processes, from supplier onboarding to sourcing, management and professional supplier development, ensuring robust oversight and risk management. Furthermore, suppliers are continuously monitored and risk-assessed, particularly those operating in higher-risk countries.

## Desktop Monitoring

### **5** Desktop audit of our Medium to High risk suppliers

Using a risk-based approach, the Compliance department has undertaken a desktop audit of (at least) 25% of the Siemens Australia supply chain since FY2 as part of our continuous improvement and monitoring. This independent review utilises global risk data to provide an additional layer of assurance.

## Our Governance and reporting approach

Our approach to managing and mitigating Modern Slavery risks is embedded in our governance, reporting, investigations and policies and procedures.

### Governance

Siemens Australia employees and the Compliance department receive targeted, group-oriented, risk-based training. We train our employees about compliance and on the content of our Business Conduct Guidelines, which addresses the risk of Modern Slavery and in all relevant governance topics including environment, health and safety, business conduct, bullying and harassment.

Compliance risks, including Modern Slavery risks and strategic program data are presented to the Siemens Australia CEO and CFO on a quarterly basis (ad hoc communication will be facilitated where required), by the Compliance department. The Compliance department is responsible for compliance in Siemens Australia and takes a zero-tolerance approach to unethical and unlawful conduct.

### Reporting

Siemens Australia encourages a culture of openness where anyone can raise concerns about our business (anonymously if they wish) and offers a range of reporting channels to enable all employees and outside third parties, to report potential compliance violations. For instance, complaints can be reported by way of our "Tell Us" service or to the independent Siemens Ombudsperson. Reports received through these channels are forwarded to our Compliance organisation. Complaints can also be reported directly to the Compliance Officer. Tell Us is available 24 hours a day, online or by telephone, anonymously (if desired) and available in multiple languages. Information regarding Tell Us and other methods of reporting is available on our Internet (for external users), Intranet (internal), within our Business Conduct Guidelines (both internal and external). **Siemens Tell Us** [\[Contact us here\]](#)

Siemens has a Whistleblower Policy and is committed to detecting and addressing misconduct and ensuring those who become aware of misconduct can report it without being concerned that it will negatively affect them or their position.

### Investigations

Internal investigations are conducted based on internal standards that help to ensure the fair and respectful treatment of employees, business partners and stakeholders.

If we become aware of potential or actual acts of Modern Slavery or breaches of the Siemens Code of Conduct, we will investigate the matter and take appropriate and necessary action. If it involves our business partners, we aim to work with them to resolve concerns, and we may choose to terminate a business partner relationship if appropriate and necessary.

## Policies and Procedures

We have a suite of policies and procedures in place to support our compliance with Modern Slavery obligations in our operations and supply chains. Our employees, suppliers, business partners and stakeholders must follow, and agree to, them.

We make these policies and procedures accessible to staff members and members of the public (as appropriate), including the following which are relevant to Modern Slavery:

- Siemens Business Conduct Guidelines
- Siemens Code of Conduct – Supplier and Third-Party Intermediaries
- The SCM Sustainability Platform
- Modern Slavery Policy
- Whistleblowing Policy



# FY 2025 and beyond

We are fully committed to respecting Modern Slavery, for our entire value chain. Our holistic approach to Modern Slavery not only encompasses our own operations but also considers our supply chain and customer related business activities. Modern Slavery is a rapid and evolving topic and we are determined to implement continuous improvement measures and provide transparency of our progress with regards to our Modern Slavery activities, to demonstrate our commitment.

## Future

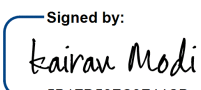
Now that we are established with a baseline, we will look beyond.

1. Continue to monitor and mitigate our Modern Slavery risks and improve our risk assessment and management processes.
2. Continue to build knowledge within our organisation and share awareness about Modern Slavery with our people, our suppliers and business partners.
3. Update our global Supplier Code of Conduct to further strengthen our commitment to Modern Slavery.
4. Conduct site visits and prioritise direct engagement with selected suppliers and business partners about Modern Slavery.
5. Strive to train 100% of our people on Siemens' Business Conduct Guidelines every three years.
6. Assess our Tier-1 suppliers and their Sub-tiers (2/3) and related business scope, with the current focus on specific critical commodities for our high-risk suppliers.

This Statement is made in accordance with the Modern Slavery Act 2018 (Cth) and constitutes our Modern Slavery Statement for the reporting financial year commencing 1 October 2023 and ending 30 September 2024.

This statement was approved by the Board of Siemens Ltd.

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Peter Halliday  
Chairman & CEO  
Siemens Ltd.  
Date: 27-Mar-25

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