

MODERN SLAVERY STATEMENT 2024

NORDEX OCEANIA



MODERN SLAVERY STATEMENT NORDEX OCEANIA 2024

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 2024.

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, the Nordex Group is continuing 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 will develop a new sustainability strategy, based on this existing strategy.

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 10,400 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 2023 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.

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. To our knowledge, these countries are currently Colombia, China, India, Pakistan, Brazil, Malaysia, Türkiye, and Ukraine. 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):

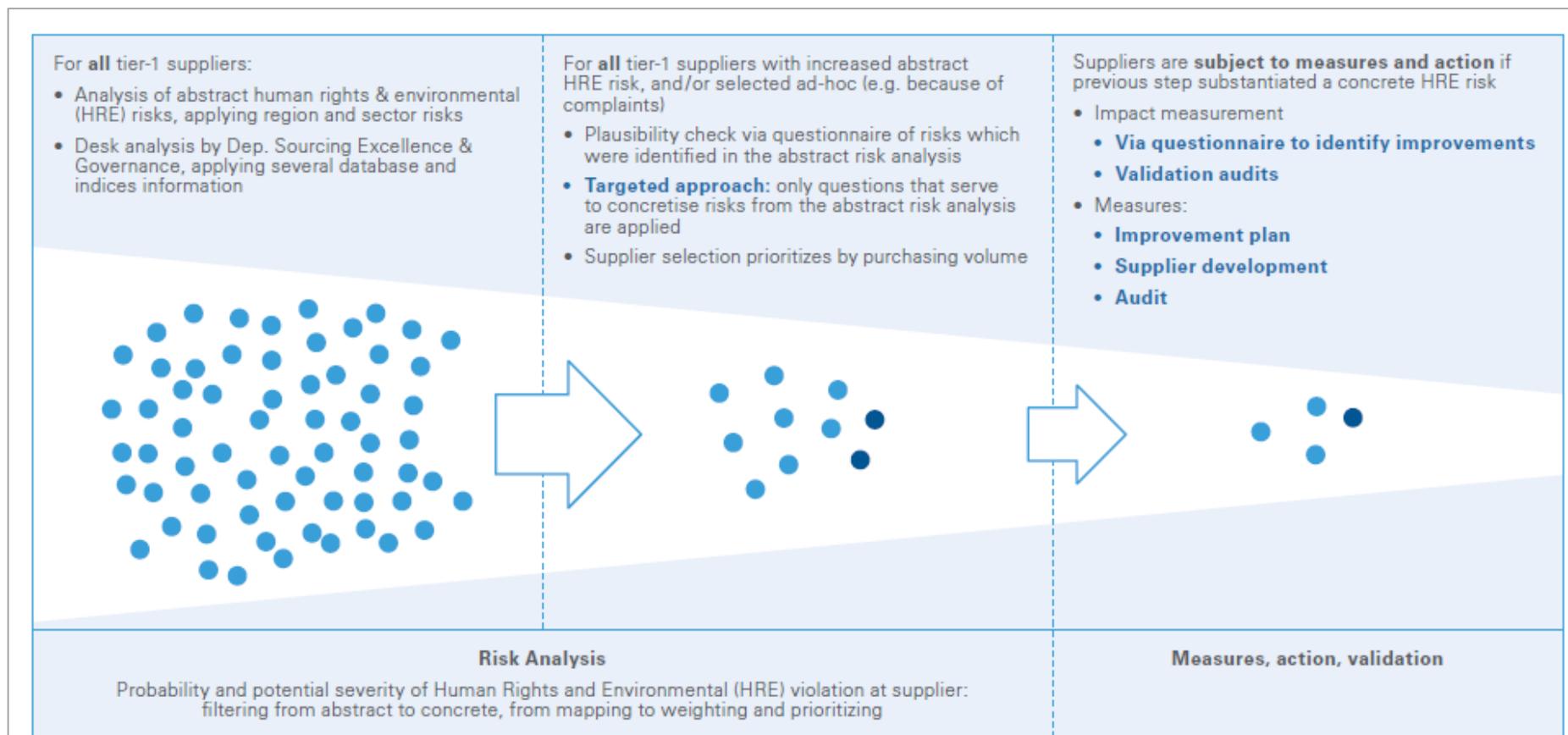


Figure 1 - Key Facts of Sustainability 2024, p. 23

In addition, we applied in the Nordex Group’s Sustainability Statement 2024 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 2024, 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:

¹ For more information see the Nordex Group’s [Annual Integrated Report 2024](#), pp.203-206.



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S2 Workers in the value chain

Category	Sub-topic	IRO	Scope
Positive Impacts		• /	
Negative Impacts	Working conditions	• (P) Unintended support of exploitative practices like child labor, forced labor or poor working conditions by suppliers in high-risk countries	
	Working conditions	• (P) Creating unstable working conditions due to short-term orders, leading to excessive overtime and inadequate wages, primarily affecting workers in the upstream value chain	
	Working conditions	• (P) Unsafe working conditions and inadequate safety due to insufficient training and temporary employment	
	Working conditions	• (P) Restricting worker's rights in countries where freedom of association or collective agreements are restricted or prohibited	
Risks	Working conditions	• Facing penalties due to 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	• Experiencing supply disruptions due to strikes or labor conflicts in the value chain, which are also medium-term risks affecting the upstream area	
	Working conditions	• Increasing financial pressures and affecting long-term profitability due to rising wages in the supply chain	
Opportunities	Equal treatment and opportunities for all	• Enhancing supply quality through knowledge transfer and close collaboration with suppliers can improve product quality and strengthen business relationships	

(A) actual (P) potential
 ●-○-○ upstream ○-●-○ own operations ○-○-● downstream
 ■ short-term ■ medium-term ■ long-term

Figure 2 - Nordex SE Sustainability Statement 2024, p. 202

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

"Regarding geographies or commodities for which there is a significant risk of child labor, forced labor, or compulsory labor among workers in the undertaking's value chain, we have conducted an analysis of the countries we source from. This analysis included the assessment of potential human rights risks in key sourcing countries such as China, India and Pakistan, where local laws and regulations may not fully address critical human rights considerations. Despite these increased regional risks, no concrete high-risks of forced or child labor were found within our supply chain. We did not identify material positive impacts.

*Only potential negative impacts, which could be widespread or systematic, were identified."*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. As the GSCA became mandatory for the Nordex Group in January 2024, we applied the relevant risk management processes for the first time in 2024, after having conducted preparatory work in 2023. Our approach is due diligence based, and considers the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. This approach gives us more insights into our supply chain's risks, which enables us to take appropriate prevention measures in case of high risk of human rights violations, and to take mitigation measures where necessary.

In 2024, we also prepared the Nordex Group's Forced Labour and Modern Slavery Policy, which describes the Nordex Group's aim and objectives in eliminating any form of forced 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

² [Annual Integrated Report 2024](#), p. 204.



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and location, and to subcontractors, suppliers and partner organisations of the Nordex Group or any of its agencies. Published on 1 January 2025, the Forced Labour and Modern Slavery Policy's development process builds on the learnings and the contents from several regional modern slavery statements, including the previous Nordex Oceania Modern Slavery Statement. 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.

In mid-2024, we started to roll out a human rights e-learning based training to those of our suppliers who were identified as having an increased risk of violating human rights, including forced labour. In 2025, we will further roll-out this training to Nordex staff.

The Complaints mechanism (whistleblower system "*notify!*"), which was updated in 2023 by explicitly mentioning modern slavery cases as to-be-reported incidents, is working efficiently. We have been providing refresher training for sourcing/supply chain managers as well as for internal staff on the link between human rights and supply chain management.

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. In 2023, we continued to communicate its contents, and launched a comprehensive, mandatory e-learning.

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 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.



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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 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.

In early 2024, we started 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.

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, in 2018 we established 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.

In 2024, a total of 113 compliance inquiries were recorded; 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.



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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 in light of the confirmed compliance violation.³

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.

In 2024 we adapted the whistleblower system to meet the requirements of the GSCA.⁴

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, training programs include awareness regarding the whistleblower system.⁵

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.

³ For details on the functioning of the Whistleblower System see publicly available [Nordex Group Integrated Report](#).

⁴ For details see the publicly available [Rules of Procedure for the Complaints Procedure pursuant to the GSCA](#).

⁵ For information on compliance trainings see publicly available [Nordex Key Facts of Sustainability 2024](#), 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:

- Implementation of measures across the Nordex Group to ensure full compliance with the GSCA.⁶
- Conduct of the analysis of the GSCA related risks in the supply chain and the Nordex Group's own workforce.
- The Nordex Group's grievance mechanism was reviewed to ensure compliance with laws and regulations.
- Development of the Nordex Group Policy on Forced Labour & Modern Slavery, which entered into force on 01 January 2025.
- Training program on protection of Human Rights rolled out for selected suppliers.
- Updating the Nordex Group's Code of Conduct for Contractors and Suppliers to take into account the GSCA and its protected human rights and environmental positions. This includes being more explicit on prohibition of any kind of violation of human rights, including forced labour and modern slavery.
- Updating general terms and conditions for suppliers and subcontractors to be more explicit on the prohibition of any kind of violation of human rights, including forced labour and modern slavery.
- 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 newly developed Nordex Group Policy on Forced Labour & 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.

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

⁶ For approach and results see the publicly available [German Supply Chain Due Diligence Act Policy Statement 2024](#).



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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.

This Statement was approved by the board of directors of Nordex Oceania on 16.06.2025 | 03:29 CEST

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