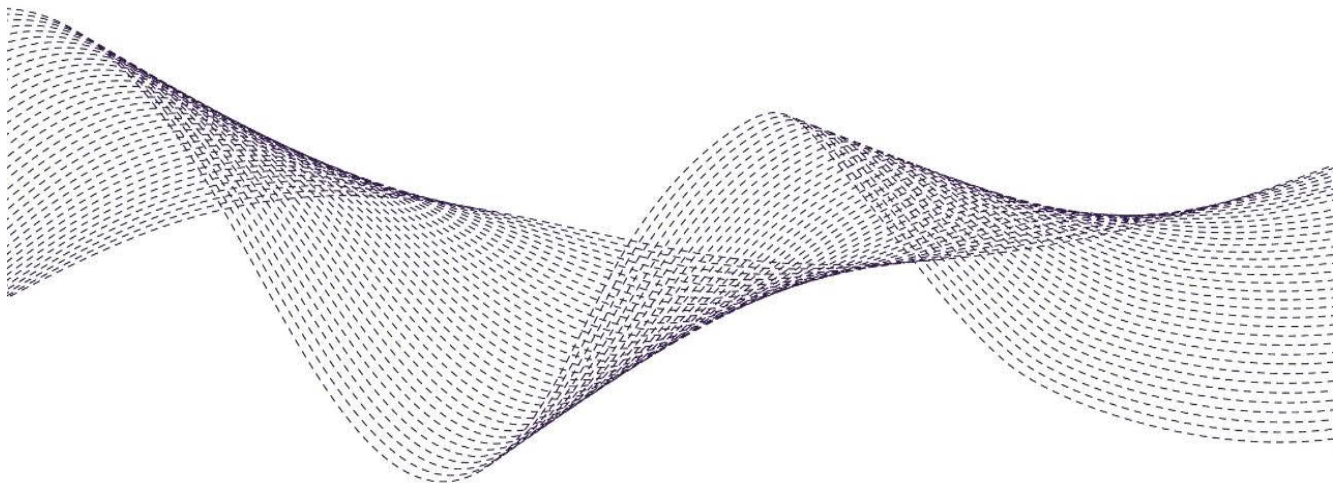


Siemens Gamesa Renewable Energy Pty Ltd
(ACN 614 784 575)

Modern Slavery Act Statement

for the reporting period to 30 September 2021



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This statement has been prepared pursuant to section 13 of the Modern Slavery Act 2018 (Cth) ("Modern Slavery Act") by Siemens Gamesa Renewable Energy Pty Ltd with its registered office at Botanicca 3 - Level 3, West Tower, 570 Swan Street, Burnley Victoria 3121, Australia.

The statement sets out the anti-modern slavery actions taken by Siemens Gamesa Renewable Energy Pty Ltd and covers the reporting period for the financial year ended 30 September 2021.

A. Our Company

A1. Siemens Gamesa Renewable Energy at a glance

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

- i) is a large proprietary company in Australia (headquartered in Melbourne, Victoria) with three (3) controlled entities, being branches in Japan and Singapore, and an overseas company in New Zealand;
- ii) directly employs 110 people as of 1 October 2021;
- iii) is 100% owned by Siemens Gamesa Renewable Energy S.A. (a listed company in Madrid, Spain) within the Siemens Gamesa Renewable Energy group of companies ("SGRE Group")¹.

SGRE Group:

- i) is a multinational corporate group and works at the heart of the global energy revolution, with a leading position in renewable (wind) energy comprising of:
 - engineer, manufacture and supply of onshore and offshore WTGs ("WTGs");
 - service and/or maintenance of WTGs; and
 - as well as delivery of wind farm project development or solution(s) in certain regions;
- ii) has a team of over 26,000 employees working in collaboration across 90 countries to engineer, manufacture and deliver such powerful and reliable wind energy solutions and services;
- iii) has a strong local footprint installing more than 107 GW of WTGs, producing clean and sustainable energy to power our homes, schools, and hospitals; and

¹ Siemens Energy AG (a listed company in Frankfurt, Germany) has a 67% majority stake in Siemens Gamesa Renewable Energy S.A.. A Modern Slavery Statement has also been submitted by its local Australian entity, Siemens Energy Pty Ltd (ACN 636 537 409).

- iv) a comprehensive portfolio, enabling us to address the challenge of climate change and help societies all over the world (including Australia) to meet their growing energy needs in a reliable, affordable and sustainable way.

A2. Structure, Operations and Supply Chains

Our Operations

From a global perspective, SGRE Group:

- i) as stated above, has a presence in more than 90 countries around the world, and its WTGs are installed in more than 70 countries;
- ii) operates more than 15 manufacturing plants in over 10 countries (including regions within Europe, the United States, India, Brazil, China and Morocco) and has approximately 40 sales offices (as of 30 June, 2021);
- iii) has supply chains which include:
 - the engineer, manufacture, supply, distribution, and installation of WTGs;
 - service and support of renewable energy solutions and related products for its global business.
- iv) has established a technical presence close to its customers across the world. Its manufacturing base is designed to ensure an efficient production process from the design of the WTGs to the manufacturing of all critical components

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

The main nacelle and blade production facilities as well as its leading R&D centers and principal sales offices, of SGRE Group are:

- Blade factories produce the entire blade for a wind turbine. In recent years, SGRE Group implemented structural shell production in all its models, which requires less infrastructure and can be implemented more rapidly. Our main blade factories are located in Fort Madison (United States), Aalborg (Denmark), Hull (United Kingdom), Tangier (Morocco), Nellore (India), Somozas (Spain), Lingang (China) and Vagos (Portugal; this plant was acquired in the context of the acquisition by SGRE Group of the Senvion business). A new factory for blades (as well as nacelles) is still under development in Le Havre (France), with start of production expected soon. A decision to close the blade factory in Aoiz (Spain) which specialized in small turbine models mainly for the Spanish market due to competitiveness considerations was made in June 2020. In addition to its own manufacturing, SGRE Group also sources blades from third-party manufacturers located in Mexico, Brazil, Turkey, India, China and Poland,

either providing its own blade designs or using the designs from the third-party manufacturer.

- Nacelle assembly factories assemble the nacelle for the wind turbine. The nacelle is the structure placed upon the tower, housing the gearbox (for onshore WTGs), generator, transformer, electronics and other components. Attached to the nacelle is the rotor consisting of a hub and three blades. SGRE Group's main nacelle assembly factories are located in Hutchinson/Kansas (United States), Camaçari (Brazil), Brande (Denmark), Cuxhaven (Germany), Ágreda (Spain), Aliaga (Turkey), Mamandur (India) and Tianjin (China). In addition, SGRE Group subcontracts the assembly of nacelles in Russia. New nacelle factories are under construction in Le Havre (France) and in Taichung (Taiwan). SGRE Group phased out onshore-related nacelle assembly in Brande in 2020.
- Tower factories produce the tower for the wind turbine. SGRE Group is a minority shareholder in tower manufacturer Windar Renovables, S.L., which has factories in Spain, India, Mexico, Brazil and Russia.
- Generator factories produce the generator which transforms the rotation energy to electricity. SGRE Group generator factories are located in Reinoso (Spain), Camaçari (Brazil) and Tianjin (China). In addition, direct drive generators are assembled in Brande (Denmark) and Cuxhaven (Germany).
- Gearbox factories are located in Spain, with the main factories located in Lerma and Sigüeiro. A gearbox is typically used in a wind turbine to increase rotational speed from a low-speed rotor to a higher speed electrical generator.
- Converter factories are located in Madrid (Spain), Valencia (Spain) and Tianjin (China). Converters enable the management of the electrical output of the wind turbine to optimize it following grid requirements.
- Cabinet factories are located in Valencia (Spain) and Tianjin (China). A control cabinet monitors certain parameters of a wind turbine in order to operate the turbine in the most efficient way.

Procurement in SGRE AU

SGRE AU's procurement function is managed centrally at the global headquarters in Viscaya, Spain, which is organised by material fields within a centrally managed commodity management structure. Only the Australian specific aspects of local procurement for the WTG project is handled by SGRE AU.

For financial year 2019, the SGRE Group's total procurement volume was €7.4 billion, representing spend with 18,932 Tier 1 suppliers globally. SGRE AU's total procurement

volume was approximately AU\$80 million and represented 350 Tier 1 suppliers. The vast majority of this purchasing volume by SGRE AU comprised of sourcing from other SGRE Group global manufacturing locations. The remainder comprises purchases of goods and/or services from around 320 third party suppliers.

B. Risks in our Operations and Supply Chain

B1. Governance in SGRE

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

SGRE Group's corporate governance system is comprised of the Articles of Association, its corporate policies (including internal rules of corporate governance and the other internal policies, codes and procedures that are described in detail in the group's corporate website²). A key group set of policies with detailed information about SGRE Group's roles, responsibilities and commitments are:

- Our Mission, Vision and values.
- Corporate Group policies: Corporate Social Responsibility, Diversity and Inclusion, Climate change, Health Safety and Environment (HSE), Supplier relationship, Human Rights, Social Commitment, etc.
- Business Conduct Guidelines ("BCG").
- Internal policies, procedures and instructions.
- Code of Conduct for Suppliers and Third Party Intermediaries ("Supplier Code of Conduct").
- Other sustainability processes and commitments at SGRE, now reflected in SGRE Group's recent Sustainability Policy dated 16 September 2021³.

SGRE Group is a constituent member of prestigious international sustainability indexes, such as Dow Jones Sustainability Indices®, FTSE4Good® and Ethibel Sustainability Index®. It is noteworthy that SGRE Group received an A rating (on a scale of AAA-CCC) in the MSCI ESG

² Siemens Gamesa Website. Link: <https://www.siemensgamesa.com/en-int>

³ Refer to Annexure A.

ratings assessment made in February 2020, allowing the company to be included in the MSCI indices with an investment grade rating. SGRE was also included in 2020 Bloomberg Gender-Equality Index (GEI).

In addition, SGRE Group has made certain public commitments which guide the company's actions:

- by endorsing a variety of initiatives connected with its activities in the environmental and social dimensions, most of which are listed throughout the document; and
- through its membership of certain business or social associations, like the ones described in section "Memberships and associations" of this report and identifying itself with their objectives and goals.

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

With respect to business partners, SGRE Group has globally applicable policies and procedures in place that ensure a uniform risk-assessment of all our business partner relationships; These policies and procedures are focused on human rights (including conflict minerals), corruption, conflict of interest, antitrust, confidentiality and data privacy, gifts and hospitality.

As a result, all SGRE AU's business partners must adhere to the SGRE Group's Supplier Code of Conduct which sets out the standard of ethical, lawful and sustainable conduct expected from our business partners.

To show what steps we are taking to make responsible business practices a core element of our practices, SGRE Group voluntarily endorsed several codes of ethical principles and good practices.

- United Nations Global Compact principles: SGRE Group has endorsed the principles of the United Nations Global Compact (participant ID 4098) and reaffirms its commitment to and support for the promotion of the ten (10) principles of labor rights, human rights, environmental protection and the fight against corruption on an annual basis. The company publishes a Communication on Progress Report each year, which reviews compliance with such principles. This document is made publicly available on the United Nations Global Compact website⁴¹⁴.

⁴ See United Nations Global Compact website. Link: <https://www.unglobalcompact.org/what-is-gc/participants/4098>

- SGRE Group was included in 2020 Bloomberg Gender-Equality Index. The index includes 325 companies from 50 industries with a combined market capitalization of US\$12 trillion, which are headquartered in 42 countries and regions. The GEI tracks the financial performance of listed companies committed to supporting gender equality through policy development, representation and transparency. The reference index measures gender equality across five areas: female leadership and talent pipeline, equal pay and gender pay parity, inclusive culture, sexual harassment policies and pro-women brand.
- SGRE Group has joined the Target Gender Equality (TGE) program promoted by the United Nations Global Compact. This program addresses barriers to gender equality and sets corporate goals for equal representation and leadership for women in business. It was set up from the need to speed up progress on urgent aspects of gender equality. By joining, SGRE Group undertakes to set and meet ambitious goals to increase the leadership of women in line with target 5.5 of the 2030 Agenda.

B2. How we Identify Risks

SGRE AU acknowledges that:

- human rights are universal and every person around the world deserves to be treated with dignity and equality;
- basic rights include freedom of speech, privacy, health, life, liberty and security, as well as an adequate standard of living; and
- potential human rights issues could occur in our own operations or in our value chain or the activities related to our business.

SGRE AU is therefore expressly and publicly committed to the objectives of ensuring fair and positive social and labor-related behavior through several high-level policies and requires its employees, business units, affiliated companies, suppliers and business partners to act in accordance with UN Global Compact principles at all times.

SGRE AU's supplier relationship policy⁵ the Supplier Code of Conduct⁶, the General Purchasing

⁵ See: Siemens Gamesa Supplier Relationship policy. Link: <https://www.siemensgamesa.com/en-int/-/media/Siemensgamesa/downloads/en/investors-and-shareholders/corporate-governance/corporate-policies/supplier-relationship-policy.pdf?la=en-bz&hash=552A19E60659E142285C31B2E6921EE4D2041196>

⁶ See: Code of Conduct for Suppliers and Third Party Intermediaries. Link: https://www.siemensgamesa.com/en-int/-/media/Siemensgamesa/downloads/en/sustainability/code-of-conduct/code_of_conduct_for_suppliers_and_third_party_intermediaries_en.pdf?la=en-bz&hash=D284F9974754A8848ABC85A15035AF0F1022B007

Conditions ⁷, our frame contracts and our internal rules and procedures form the basis for these objectives, as they all set minimum expectations for suppliers to comply with. They all integrate the Principles of the UN Global Compact on Human Rights, Environment and Anti-Corruption and provide fundamental guidance for our business activities.

The Supplier Code of Conduct is based on – among others – the UN Global Compact and the principles of the International Labor Organization, the principles of the Rio Declaration on Environment and Development, the Responsible Business Alliance [®] Code of Conduct⁸, WindEurope[®] Industry Principles and ISO standards. It also reflects the SGRE AU's internal BCG, which reinforces the fundamental principles of sustainability and applies company-wide.

The Supplier Code of Conduct establishes standards to ensure that working conditions in the company supply chain are safe, that workers are treated with respect and dignity, and that business operations with suppliers are ethical, social and environmentally responsible. The Code remains independent and updated on a regular basis to reflect the standards of SGRE in its operations with suppliers.

SGRE AU promotes the Supplier Code of Conduct to all suppliers and requests compliance and adherence to it as well as to all applicable laws and regulations from all our suppliers and third-party intermediaries. The Supplier Code of Conduct is incorporated into our General Purchasing Conditions, framework contracts and purchase agreements with each supplier, as well as into procurement tools.

SGRE AU also released the Booklet for the Code of Conduct for Suppliers and Third Party Intermediaries⁹ (also commonly referred to as “the Code of Conduct Booklet”). This comprehensive material documents in detail our expectations towards our suppliers in each requirement presented in the Code of Conduct, being an important support for our sustainability detection modules. The development of the Supplier Code of Conduct and the Code of Conduct Booklet is the result of the work performed by the Supplier Lifecycle Management and Sustainability community, which SGRE Group has established since 2017. The group has representation in external communities, like the WindEurope[®] Sustainability Task Force, and is engaged in relevant sustainability topics.

SGRE AU maintains appropriate supplier quality management processes that meet applicable local legal and regulatory requirements as well as the requirements established

⁷ See General Purchasing Conditions. Link: https://www.siemensgamesa.com/en-int/-/media/siemensgamesa/downloads/en/sustainability/purchase-conditions/siemens-gamesa-gpc-002-2018-06-en_sgre-general-purchasing-conditions.pdf?la=en-bz&hash=1AAE86231AB9BD2E3918DE4EEE1DA5BB0DDC316B

⁸ See Responsible Business Code of Conduct. Link: <http://www.responsiblebusiness.org/code-of-conduct/>

⁹ See: Booklet for Code of Conduct for Suppliers and Third-Party Intermediaries. Link: <https://www.siemensgamesa.com/en-int/-/media/siemensgamesa/downloads/en/sustainability/suppliers/sgre-conduct-suppliers-and-party-intermediaries.pdf?la=en-bz&hash=D17D5001EF6FD9744633CBC0FE133C20AC0104C0>

by SGRE Group. Suppliers are qualified, evaluated, reviewed and developed against a set of criteria that mirror these and are embedded in all our business processes.

The SGRE Group's *Sales Business Approval* ("SBA") process is the internal approval process for all SGRE Group projects which eventually involve external customers (customer projects) including the development of wind farm opportunities. It defines the framework for decision-making regarding project approvals ("SAPP approval") in the project and service business, i.e. when, how, and at what level management decisions based on compliance risks are required.

One of the steps for SAPP approval includes a "Project Risk Evaluation" when each project must be thoroughly evaluated regarding the potential risk it can bring to make sure that contracted projects are in line with the economic and financial targets as well as the desired risk profile of SGRE Group. In this process, compliance is evaluated mandatorily, through the Compliance Risk Evaluation ("CRE") using pre-defined questionnaires in order to identify, mitigate and/or approve risks. Human Rights is a module of the CRE within the SBA.

In this module, SGRE has a due diligence process to both proactively and systematically identify potential human rights risks. All projects which meet the criteria are subjected to the SGRE Human Rights Project Due Diligence process. The project is thoroughly assessed using a predefined detailed questionnaire and external environmental, social and governance ("ESG") tools for any potential human rights risks with regard to its location, labor rights, local community rights, livelihoods and the partners involved, including customers, suppliers, consortium partners and security detail, where applicable. All potential risks must be mitigated and, if mitigation is impossible, the project will not be approved by the CRE process.

Additionally, human rights risks are a mandatory element of the Compliance Risk Assessment ("CRA"), conducted every 2 years. Any human rights risks detected during the bottom-up risk assessment conducted on each SGRE Group unit must have a mitigation plan set for it, which must be implemented in the following financial year. The last CRA was conducted in 2018 and no specific human rights risks were detected. In accordance with its two-year cycle, the CRA 2020 was completed on September 28, 2020.

B3. Identifying and Managing Risk

Sustainability high risk suppliers in SGRE Group operations and supply chain are continually being monitored and tracked. These high risk suppliers, are identified based on the following criteria:

- i) if they operate or are based in a high risk country (from sustainability perspective);
- ii) if they have incidents of compliance misconduct; or
- iii) not participating or scoring "low" in the Supplier Code of Conduct compliance detection modules (sustainability self-assessments, external sustainability audits and Supplier Quality audits with sustainability scope). Suppliers with demonstrated incidents of misconduct in any sustainability aspect are considered as sustainability high-risk suppliers regardless of their location.

The suppliers identified as having sustainability high risk to SGRE Group in fiscal year 2020 accounted for 16% of the year's total purchasing volume (approximately €1.2 billion).

More specifically in relation to the Modern Slavery Act, SGRE AU conducted a specific assessment to do an even further deep dive into our supply chain and SGRE AU has proactively engaged with a number of suppliers that fall under the medium to high risk and medium to high risk spend (purchasing volume above AU\$50,000) categories.

SGRE AU proactively engaged with a number of suppliers that fell into medium and high-risk categories in fiscal year 2020, requiring these suppliers to complete a corporate responsibility self-assessment (CRSA) and a Modern Slavery specific questionnaire. This assessment focuses on a selection of important minimum requirements relating to governance in the supply chain. Based on the answers given by the supplier, corrective actions are generated in case of insufficient answers. The corrective action plan is then monitored, and in line with our supplier quality management framework, subsequently closed when the implementation is successfully completed.

The results of this assessment were as follows:

- 92.28% of suppliers (including associated wider Siemens Ltd's group entities) were categorised as low risk/spend;
- 6.43% of suppliers were categorised as medium risk; and
- 1.29% of suppliers were categorised as high risk.

Among those classified as high risk, SGRE AU have found that there are potential risks that modern slavery practices may be present in the operations and supply chains of SGRE Group:

- Awareness in modern slavery risks. Some of SGRE AU's suppliers do not have any policies or procedures to be able to detect modern slavery risks in their operations or supply chain.
- Whistleblowing policy and related risks. About a third of vendors, due to the smaller size of their operations, do not have mechanism for employees to anonymously raise concerns related to labour conditions or workplace grievances and access appropriate remedy. This indicates that there is a potential risk that these vendors may have modern slavery or harsh and Inhumane treatment embedded in their operations.
- Labour rights, including forced or compulsory labour, wages and benefits, work hours and child labour (including unskilled, temporary or seasonal labour) – some suppliers have operations in countries that are considered high risk countries for modern slavery.
- Health and safety (for workers engaged in operations outside of SGRE AU or SGRE Group's direct control)

As the exercise highlighted a number of areas in our supply chain that may be susceptible to

any Modern Slavery risks, SGRE AU is aiming to focus efforts improve the situation in any high risk areas identified.

To address these areas, SGRE AU is committed to its modern slavery and health and safety policies in identifying and managing any potential risks as follows:

- Supplier Quality Audits are used to verify and continuously improve the quality and capabilities of suppliers. They may be conducted on a regular and scheduled basis (i.e. every 2 years for suppliers classified as high risk).
- Continue to assess suppliers regularly and their compliance to Supplier Code of Conduct; SGRE AU has appointed internationally recognised auditing companies to assist in conducting External Sustainability Audits with all high risk vendors; these on-site audits are based on the principles outlined in the Supplier Code of Conduct.
- Increased engagement with suppliers with risks of modern slavery in their supply chains to understand their practices and provide support to address any modern slavery practices if discovered.
- Participation in the Clean Energy Council Modern Slavery Working Group where members are collaborating in effort to identify and address modern slavery in the renewable energy sector.
- Participating in a forum between Siemens Ltd group of companies to discuss ways to continually manage and mitigate risks in modern slavery amongst all our supply chains.
- Adopting the Intertek WCA program which focuses on seeking to improve workplace conditions efficiently and in accordance with widely accepted industry standards and best practices. The program is focused on a number of areas that have been identified as high risk, but also includes a particular focus on labour conditions in our supply chains.

B4. How we assess the Effectiveness of these Actions

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

- i) Reviews are conducted 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 out business. This achieves both endorsement and awareness which providing support to ensure that this important topic is addresses thoroughly.
- ii) This is supplemented by cross-functional reviews between the Human Resources, 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.
- iii) SGRE AU will continue to review processes and procedures to ensure progress including promotion of awareness of the topic of Modern Slavery and why it is important to address.

B5. Process of Consultation with any entities the reporting entity owns or controls

As pointed out earlier, SGRE AU owns and controls entities in Japan, Singapore and New Zealand. Executive management of SGRE AU (in particular the directors) are directly involved in those businesses and ensure SGRE Group policies and guidelines are mandated to apply.

This issue is addressed within the Siemens Gamesa Renewable Energy Group Sustainability Policy 2021 and actions outlined in that report of address Modern Slavery Risks. As stated above, these include globally mandated processes and practices applicable to all SGRE Group including SGRE AU.

C. Our Commitments

C1. Reporting and Compliance

Compliance Risk Assessment ("CRA")

SGRE AU's CRA ensures the bottom-up identification of risks in individual SGRE Group units worldwide and its goal is to evaluate these risks and to define mitigation measures accordingly. Moreover, the CRA creates an awareness of compliance risks, strengthens cooperation between the compliance organization and the operational units and emphasizes the responsibility of the managing directors and management in general for compliance-related topics. The CRA 2020 was completed on 28 September 2020. The remediation of identified risks in this CRA have commenced to be executed in financial year 21 and continues in financial year 22.

This has culminated in the release of the SGRE Group Sustainability Policy 2021.

Compliance cases

A compliance case is any violation of criminal and/or administrative law or SGRE AU's internal regulation, such as the BCG, in the course of the business activity by at least one employee of SGRE AU and/or a third party working on behalf of SGRE AU. SGRE Group expects its employees to report any information they may have regarding impending or existing compliance cases without delay. Compliance cases can be reported by employees via the following channels:

- their manager;
- directly to the Chief Compliance Officer;
- the responsible Compliance Officer;
- human resources personnel;
- the Whistleblowing Channel Integrity Hotline⁴⁹, which also gives employees with the chance to remain anonymous, if legally permissible under local law; and/or

- SGRE AU employee representatives.

All compliance cases are managed by the compliance organization in the internal compliance case management tool.

Retaliation of any kind against individuals who have reported compliance cases in good faith will not be tolerated. This prohibition applies to any action that may directly or indirectly harm the reporting person's employment relationship, earning potential, bonus payments, career development or other work-related interests.

Policy Framework

SGRE Group first approved and started implementing the Human Rights Policy ¹⁰in 2018. Commitments in this area are therefore reflected in an individual and specific policy. This policy was first approved by a resolution of the Board of Directors taken on 12th September 2018. Our commitment to this principle is firmly rooted in the BCG which set out the fundamental principles and rules governing the way we act within our company and in relation to our partners and the general public.

Accordingly, the company's involvement in any human rights infringements or other adverse human rights impacts must be avoided. Compliance with applicable laws and regulations is essential, but beyond that SGRE AU employees are expected to be aware of these issues. They are also expected to avoid infringing the human rights of others and to address the adverse human rights impacts of the activities and circumstances in which the company is involved.

To reiterate, one of the steps within the SBA process includes a CRE to determinate if the project needs to be thoroughly monitored with regard to potential human rights violations. Through the CRE and with the use of predefined questionnaires ("SGRE Human Rights Project Due Diligence"), the Compliance department can assess and mitigate potential risks associated to human rights.

Since the previous statement, SGRE Group Board of Directors has on 16 September 2021 approved a Sustainability Policy to be applicable for all of its regional entities including SGRE AU.

Supplier Code of Conduct

An integrated supplier management process is embedded company-wide in unified, mandatory procurement processes and a key part of this is ensuring that our suppliers agree contractually to abide by the Supplier Code of Conduct. We developed a system of contractual obligations to ensure that all our suppliers commit to its requirements:

- Qualifying suppliers: within our Supplier Qualification process, all suppliers must pass several preliminary requirements – one being the commitment to our Code of

¹⁰ See Human Rights Policy. Link: <https://www.siemensgamesa.com/en-int/-/media/siemensgamesa/downloads/en/investors-and-shareholders/corporate-governance/corporate-policies/human-rights-policy.pdf?la=en-bz&hash=F332C18BD58C8E5CE8C50824E4AEB31C562D2DF1>

Conduct.

- Negotiating contracts: all new and extended procurement contracts must include the “Corporate Responsibility” contract clause which commits the supplier to our Supplier Code of Conduct and, additionally, defines self-assessment and audit rights.
- Purchase orders: to complete the system and to cover possible small procurement volumes which might not be covered by explicit procurement contracts, all purchase orders include the Supplier Code of Conduct commitment in the General Purchasing Conditions.

In fiscal year 2021, the total purchasing volume of suppliers that have accepted the Supplier Code of Conduct was 89% in comparison to 85% last fiscal year demonstrating the improvement in the integration of our controls.

C2. Our Focus

SGRE considers respect for human rights to be an integral part of our responsibility as a global business. For us, this responsibility is a core element of responsible business conduct and we are committed to ensuring respect for human rights within SGRE’s sphere of influence.

As stated in the Business Conduct Guidelines, SGRE recognizes its responsibility for respecting human rights as a core element of responsible corporate behavior. SGRE is a member of the United Nations Global Compact. Its ten Principles, and the Industry All Union Global Framework Agreement¹¹ are binding to the entire company. SGRE aims to ensure respect for human rights in its own business operations and to request this in its value chain. The United Nations Guiding Principles on Business and Human Rights (UNGP) provide SGRE with valuable guidance.

SGRE is committed to embrace and support, within its sphere of influence, the set of core values in the areas of human rights, labour standards, the environment, and anti-corruption included in the United Nations Global Compact (UNGC) as an integral part of its business strategy and operations.

Respecting human rights is covered by SGRE’s Compliance System as follows:

- Human rights form part of Compliance training.
- Human rights are a module of the CRE within the SBA.
- Human rights risks are a mandatory element of the CRA.
- Human rights are part of the compliance reporting performed by the Chief Compliance Officer.

SGRE AU implemented a risk-based due diligence process to identify any areas of non-

¹¹ See Global Framework Agreement. Link: <http://www.industrial-union.org/industrial-renews-global-agreement-with-siemens-gamesa>

compliance of our Supplier Code of Conduct and highlight opportunities to promote improved performance. This includes systematic screening of new and existing suppliers through background checks and risk assessments associated with the sector and countries of operation. For example, reports from external providers provide us with information on geopolitical, commodity and financial risks. If relevant, suppliers are selected to go through one or more detection modules, as is the case for high sustainability risk suppliers.

- Sustainability Self-Assessments (CRSA): the supplier receives a Supplier Code of Conduct questionnaire and provides its own assessment of fulfilled requirements. The questionnaire is available on SGRE AU's own platform or applied by a third party on behalf of SGRE AU.
- Supplier Evaluations: to ensure that suppliers continuously comply with our performance requirements in the course of the supplier relationship, performance of existing SGRE AU suppliers is evaluated regularly based on standardized criteria as stipulated by ISO standards. The supplier evaluation is performed at least once a year and has our most relevant and critical suppliers in scope. The evaluation is carried out by collaborative cross functional teams and results in a standardized classification which ranges from "Excellent" to "Phase out" status.
- External Sustainability Audits: SGRE AU has appointed internationally recognized auditing companies to conduct on-site audits based on the universally valid principles of the Supplier Code of Conduct. The outcome is an in-depth assessment and report that enables SGRE au and its suppliers to identify and manage potential sustainability risks. External Sustainability Audits also play an important role in the supplier development scheme by improving the supplier's sustainability performance.
- Supplier Quality Audits with Sustainability Scope: as part of our internal Supplier Qualification and Audits processes, audit questionnaires have been devised to include the scope of the Supplier Code of Conduct and are applied to critical suppliers from a quality perspective.

We are committed to working toward avoiding the use, within our supply chain, of minerals from conflict affected and high-risk areas which are affected by the risks defined in Annex 2 of the OECD Due Diligence Guidance ¹².

Conflict Minerals are defined as cassiterite, columbite-tantalite, gold, wolframite, or their derivatives, or any other minerals or their derivatives (3TG alias tantalum, tin, tungsten, the ores from which they originate, and gold) that may be used for financing conflict in the DRC (Democratic Republic of Congo) Region.

Already in fiscal year 2018 SGRE AU harmonized its due diligence process for Conflict Minerals by taking part in the already established process in Siemens AG (which is the ultimate parent

¹² See OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.Link: <https://www.oecd.org/daf/inv/mne/mining.htm>

company of the broader global Siemens group of companies, comprising of, among others, Siemens Energy which controls the SGRE Group) according to the requirements of Regulation (EU) 2017/821. Siemens AG has established a centralized approach for the due diligence process and follow up for mitigation with suppliers that are identified based on material groups that may potentially contain conflict minerals.

The advantageous position of Siemens AG as active member of the Responsible Mineral Initiative (RMI) gives SGRE AU access to Reasonable Country of Origin Information (RCOI) on smelter level. We purchase 3TG from conformant smelters when these minerals are necessary for manufacturing of our products. In order to mitigate the risk of working with suppliers whose smelters have not been audited by RMI so far, SGRE AU (through Siemens AG) actively engages within RMI's Responsible Minerals Assurance Process (formerly Conflict Free Smelter Program).

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

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

This statement was approved by the Board of SGRE AU on 11 July 2022 for the year ended 30 September 2021.

Signed in accordance with a resolution of the Board of Directors

Siemens Gamesa Renewable Energy Pty Ltd

Thomas Hertling

Managing Director and CEO

Dirk Janssen

Director and CFO

Annexure A – Sustainability Policy (16th September 2021)



SUSTAINABILITY POLICY

OF SIEMENS GAMESA RENEWABLE ENERGY, S.A.

(Text approved by resolution of the Board of Directors dated September 16, 2021)

SUSTAINABILITY POLICY

Pursuant to the provisions of section 529 *ter* of the Corporate Enterprises Act (*Ley de Sociedades de Capital*), article 33 of the By-Laws and articles 6, 7.3 and 38 of the Regulations of the Board of Directors, the Board of Directors of Siemens Gamesa Renewable Energy, S.A (hereinafter "**Siemens Gamesa**" or the "**Company**") hereby approves this Sustainability Policy (the "**Policy**"), which replaces the Global Corporate Social Responsibility Policy, and which is included within the Company's Corporate Governance Rules.

1 PURPOSE AND SCOPE

The purpose of this policy is to give clear direction, objectives and governance structure with regards to Sustainability for Siemens Gamesa Renewable Energy (hereafter 'Siemens Gamesa'). The Siemens Gamesa Sustainability Policy applies globally to all Siemens Gamesa activities, regions and locations. It is mandatory for all employees working for Siemens Gamesa, on its behalf or under its authority.

2 POLICY DESCRIPTION

The policy is developed in line with the mission, vision and values of Siemens Gamesa. Sustainability translates into the conduct of responsible corporate activities taking future generations into account and contributing to the creation of a sustainable world. To that end, Siemens Gamesa adopts the following six guiding principles:

3. GUIDING PRINCIPLES

1. **Protecting our Planet** by actively fighting against climate change, while permanently assessing climate change business risks: reducing our impacts on climate, optimizing our use of material or energy resources, reducing our waste, making use of low-carbon solutions to reduce emissions to air, limiting the use of water and protecting biodiversity from Siemens Gamesa's activities and making real what matters – clean energy for generations to come.
2. **Valuing our People** by embracing health, diversity, promoting equal opportunities for all including especially under-represented groups, and fostering an inclusive and safe environment in which every individual has a sense of belonging and feels empowered to express themselves.
3. **Collaborating with our Suppliers** by ensuring adherence to our code of conduct that includes respecting human and labor rights and reducing the impact to climate and environment in our value chain.
4. Being the **Responsible Investment of Choice** with focus on integrity and transparency in our public disclosures.
5. **Committing to Society Beyond our Business**; to actively reduce poverty in our communities, to fight climate change, and to promote technological education in line with the future needs of society all aligned with the Sustainable Development Goals of the United Nations for a better future.
6. **Complying with, and exceeding** where practicable, all applicable legislation, regulations and codes of practice.

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3.1 Protecting our Planet

Siemens Gamesa aims to minimize the environmental impact of our activities and by doing so, contribute to sustainable development and enhance our planet. Siemens Gamesa's Environment, Health and Safety Policy elaborates on the company's commitment to environmental protection and our implemented governance mechanisms ensure compliance with environmental legal requirements and Siemens Gamesa's internal requirements.

Climate change is the most important environmental aspect to Siemens Gamesa. The company is committed to combatting climate change by minimizing the emissions deriving from its value chain and through its product and service offerings, making real what matters – clean energy for generations to come. Further, Siemens Gamesa routinely assesses potential risks derived from climate change to ensure the continuity of its business activities. Previous Siemens Gamesa's Climate Change Policy has been replaced by this Sustainability Policy which reinforces the company's commitment to fighting climate change.

Siemens Gamesa is further committed to contributing to a circular economy, by optimizing the use of resources, ensuring responsible waste management and designing with safe materials and circularity in mind.

Siemens Gamesa respects the natural environment and minimizes the impacts on ecosystems through the use of methods that support the protection of biodiversity and water resources.

3.2 Valuing our people

Siemens Gamesa is committed to cultivating a diverse workforce with equal opportunities and a culture of inclusion and belonging. We aim to be an employer of choice by pursuing improvements in people's quality of life, and by empowering and motivating all employees with an exciting culture in which all of us are treated with respect and dignity, creating an outstanding place to work by supporting differences and providing equal conditions for everyone. Siemens Gamesa's Diversity and Inclusion Policy establishes the principles of diversity and inclusion that apply within the company in order to strengthen corporate ethics. Our employment model is based on respect for and compliance with universal human rights standards.

Siemens Gamesa is committed to ensuring a healthy working environment through the promotion of a healthy lifestyle and psychological well-being as well as committed to elevating the standards of safety performance. Siemens Gamesa's Environment, Health and Safety Policy elaborates on the company's commitment to safety, occupational health and well-being and our implemented governance mechanisms ensure compliance with health and safety legal requirements and Siemens Gamesa's internal requirements.

3.3 Collaborating with our suppliers

Siemens Gamesa expects our suppliers to promote sustainability practices along their operations. As part of sourcing a wide range of products and services from numerous suppliers across multiple countries, close collaboration with our suppliers is of key importance to ensure the sourcing of goods and services under responsible conditions in terms of human rights, safety conditions, environmental and climate protection.

Accordingly, complementary governance mechanisms are to be implemented to ensure compliance with laws and regulations as well as adherence to and support of international principles for sustainable business conduct. Siemens Gamesa's Supplier Relationship Policy, the Code of Conduct for Suppliers and Third-Party Intermediaries, the General Purchasing Conditions form the minimum expectations for suppliers to comply with applicable legislation, regulations and codes of practice.

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3.4 Responsible investment of choice

Siemens Gamesa believes that our sustainability principles actively support an increasing growing investors' demand for verifiable and consistent information, so they can take informed investment decisions. These principles may apply to its own financing decisions; Therefore, Siemens Gamesa is committed to provide a proactive and transparent disclosure of financial and non-financial matters, both quantitatively as well as qualitatively, according with International Reporting Standards.

Additionally, Siemens Gamesa is committed to engage and work with ESG (Environmental, Social, Governance) ratings and indexes to benchmark its own performance compared to sector peers and implement best practice in its operations.

The company also makes public commitments and partnerships to support the matters covered in this policy.

3.5 Committed to society beyond our business

Siemens Gamesa is committed to contributing to the improvement of quality of life and the creation of wealth as well as is committed to society beyond the business and has published a Social Commitment Policy.

The objectives of the Social Commitment Policy are:

- Promotion of Social Commitment, including social assistance and social inclusion.
- Social aims related to sustainability and especially to climate change.
- Foster and support of educational initiatives.

The Social Commitment Policy rests on the following principles, among others:

- Medium- and long-term commitment to society.
- Strengthening of the reputation of the Siemens Gamesa Group as a social player in the communities in which it does business.
- Transparency in providing aid to society.

The Social Commitment team holds the governance function of the content of the Social Commitment Policy, including approval and coordination, regarding any activity to help society beyond business on behalf of Siemens Gamesa.

3.6 Compliance with applicable legislation, regulations and codes of practice.

Siemens Gamesa is dedicated to conducting business with integrity and to be a trustworthy partner to all our stakeholders. Siemens Gamesa has implemented unambiguous and binding principles of conduct that ensure that Siemens Gamesa as minimum acts according to law as well as to internal policies set out in the Business Conduct Guidelines. The business conduct guidelines are a commitment to absolute respect for the human and labor rights recognized by domestic and international law and particularly the principles on which they are based: i) the UN Global Compact, ii) the Guiding Principles on Business and Human Rights, put into practice within the United Nations "Protect, Respect and Remedy" framework, iii) the OECD Guidelines for Multinational Enterprises, iv) the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, and v) the Social Policy of the International Labor Organization, as well as documents or texts that may replace or supplement those referred to above.

Likewise, within the framework of the provisions of the Corporate Tax Policy, the Siemens Gamesa Group assumes certain good tax practices in connection with (a) prevention of tax risk; (b) relations with Tax Authorities; (c) reporting to the Board of Directors; (d) reporting to the market on compliance with the good tax practices endorsed by such policy; and (e) update of good tax practices.

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4. SUSTAINABILITY GOVERNANCE STRUCTURE

The following section will describe the governance structure of sustainability-related topics of Siemens Gamesa.

The Board of Directors, sets the strategic direction and ambition for Sustainability at Siemens Gamesa aligned with the Corporate Strategy, approves the Sustainability Targets and monitors the achievement of these. Further, the Board of Directors drafts the Consolidated Non-Financial Statement with the frequency it deems appropriate, after consulting with reports from the Audit, Compliance and Related Party Transactions Committee and the Appointments and Remunerations Committee, in the scope of their corresponding competencies.

The Audit, Compliance and Related Party Transactions Committee is responsible for overseeing the integrity and compliance of the Consolidated Non-Financial Statement. This Committee is responsible for knowing, promoting, guiding and overseeing the sustainability strategy and practices and for evaluating the level of compliance therewith. Further the Committee is responsible for evaluating the level of compliance with the Sustainability Policy and recommending to the Board of Directors updates when deemed necessary. It will also monitor the portfolio of sustainability programs approved by the Executive Committee and the performance and KPIs related to the programs. Furthermore, the Audit, Compliance and Related Party Transactions Committee reports the sustainability strategy and targets for the approval of the Board of Directors, providing recommendations for inclusion or update of targets.

The **Executive Committee** approves the portfolio of Sustainability programs, assigns responsibility and resources for the programs at executive level and monitors progress of the portfolio. The Executive Committee is accountable for the implementation of the Siemens Gamesa's sustainability portfolio. Further, the Executive Committee proposes the Sustainability targets for the approval of the Board of Directors.

The **Sustainability Working Group** is appointed by the Executive Committee and is accountable for the development and championship of the sustainability strategy, that contains the sustainability programs and targets. The Sustainability Working Group reviews the Sustainability Strategy on an annual basis, provides recommendations for inclusion or update of programs and targets, monitors performance and KPIs related to the programs and approves related data. Further the Sustainability Working Group proposes the Sustainability Programs Portfolio for the approval of the Executive Committee. The Sustainability Working Group is chaired by the Head of QM&HSE, it meets periodically, and each member has governance responsibility of assigned programs, policies and procedures.

The **business units and corporate functions** are responsible for developing procedures, defining and implementing actions to fulfil the programs and targets applicable to their scope and reporting on performance to achieve the sustainability programs. Further the business units and corporate functions perform a yearly review of the existing themes, programs and targets, proposing updates to the Sustainability Working Group.

5. NON-FINANCIAL REPORTING AND RISKS

The Board of Directors through the Audit, Compliance and Related Party Transactions Committee oversees the process of preparing and presenting the non-financial information regarding the Company and its Group. For this purpose, the Committee will review, prior to its approval by the Board of Directors, the statement of non-financial information. It also oversees that the control and management of risks identify or determine at least the different types of financial and non-financial risks (financial, operational, strategic and compliance) affecting the Company and its Group.

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6. ENGAGEMENT AND COMMUNICATION WITH STAKEHOLDERS

Siemens Gamesa will foster communication and dialogue with stakeholders thus facilitating the Siemens Gamesa Group's relationships with its workforce, shareholders and the financial community, customers, suppliers, and any other groups which participate in its business activity and reality. Siemens Gamesa's stakeholder dialogue seeks to transmit knowledge on issues that are significant to its stakeholders, with the aim to adapt, to the extent possible, the policies and strategies of the Siemens Gamesa Group to the interests, concerns and needs of such stakeholders.

For these purposes, the use of all available communication channels are relevant (i.e. direct contact, social networks, corporate website, Annual General Meeting of Shareholders, CNMV's website, electronic shareholders forum, shareholders' office, institutional relations inbox, press releases, fairs, conferences and public appearances, press conferences, internal corporate channels, integrity hotline, etc.).

Siemens Gamesa will develop responsible communication practices that prevent the manipulation of information and protect the company's honour and integrity in accordance with the Policy of Communication of Economic-financial, Non-financial and Corporate Information via Media, Social Media or Other Channels and regarding Contacts and Relations with Shareholders, Institutional Investors and Proxy Advisors.

The main source of information related to its non-financial performance will take place annually in Siemens Gamesa's Consolidated Non-Financial Statement, according to applicable legal requirements.