

# Siemens Energy Pty Ltd

**ACN 636 537 409**

Modern Slavery Statement  
for the Reporting Period to 30 September 2023



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

## 1. Reporting Entity

This Modern Slavery Statement is made in accordance with the requirements of the *Modern Slavery Act 2018* (Cth) by Siemens Energy Pty Ltd ACN 636 537 409 with its registered office at 885 Mountain Highway, Bayswater, Victoria 3153, Australia. The statement covers the reporting period for the financial year ended 30 September 2023.

Siemens Energy Pty Ltd is a large proprietary company which is part of the Siemens Energy group of companies ultimately owned by Siemens Energy AG (*Siemens Energy Group*). This statement does not cover some separate processes of the Siemens Gamesa Renewable Energy Group (which files a separate modern slavery report).

At Siemens Energy, our mission is to support our customers in transitioning to a more sustainable world based on our innovative technologies and our ability to turn ideas into reality. Our portfolio, extensive energy experience, and ambitious strategy to decarbonize global energy systems are all central to our efforts to be a valued partner and driver of the energy transition.

The United Nations' Sustainable Development Goals (SDGs) guide us in our ambition to become a sustainability leader in the industry. To ensure our efforts have the biggest possible impact, we focus on five SDGs, two of which are directly relevant to this report:

- To achieve SDG 5 “Gender Equality,” we are striving to create equal opportunities, in the firm belief that not just our company but society as a whole can benefit from inclusion and diversity.
- We cover SDG 8 “Decent Work and Economic Growth” with the innovative power of our global operations, which stimulate economic development in many countries and create decent, future-proof jobs.

As a globally operating company, we are aware of the impact our business has on people around the world, especially from our large-scale energy projects.

### Dimensions of human rights



On January 1, 2023, the Executive Board appointed Group Compliance Officer Dr. Anita Schieffer for the newly created position of Human Rights Officer. Our Human Rights Officer monitors and reports on human rights compliance to the Executive Board in the course of quarterly meetings of the Compliance Review Boards and on an ad hoc basis.

In fiscal year 2023, Siemens Energy published a Policy Statement on Respect for Human Rights and Environmental Protection on its global website. This was communicated to our employees, further raising awareness for human rights.

The commencement of the German Supply Chain Due Diligence Act has influenced the Siemens Energy Group actions globally. Siemens Energy maintains regular exchanges with networks such as econsense, a German sustainability network of internationally operating companies, particularly with a view to the German Supply Chain Due Diligence Act.

We are committed to human rights in our employee relations through inclusion and diversity, and for safe and healthy working conditions.

We are dedicated to responsible business conduct and committed to ensuring respect for human rights within our spheres of influence. Identifying and managing our human rights impacts and mitigating risks along our entire value chain is therefore imperative.

Our actions go beyond compliance with applicable laws and regulations they include our commitment to:

- International Bill of Human Rights, consisting of:
  - › Universal Declaration of Human Rights
  - › International Covenant on Civil and Political Rights and
  - › International Covenant on Economic, Social, and Cultural Rights
- European Convention on Human Rights
- ILO (International Labour Organization) Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy
- ILO Declaration on Fundamental Principles and Rights at Work (in particular on the following topics: elimination of child labor, abolition of forced labor, prohibition of discrimination, freedom of association, the right to collective bargaining, and fundamental freedoms)
- UN Sustainable Development Goals specifically SDG 8 “Decent Work and Economic Growth,” which we have defined as one of our priority SDGs
- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- OECD Guidelines for Multinational Enterprises
- Principles of the United Nations Global Compact (UNGC), to which we are a signatory

## 2. Structure, Operations and Supply Chain

### Structure

Siemens Energy AG is the ultimate owner of Siemens Energy Pty Ltd which is headquartered in Melbourne, Australia and does not own or control other entities. It mainly carries on business in Australia, however it is also registered as a foreign company in New Caledonia (1 465 863 R.C.S. Noumea), as an overseas company in New Zealand (7875745), and as an overseas company in Papua New Guinea (3-127175). From time to time the entity does minor and infrequent work in Fiji. The operation is predominantly office and project-site based.

As of September 30, 2023, the Siemens Energy Group employs about 96,000 people in more than 90 countries worldwide. Siemens Energy Pty Ltd employed approximately 268 permanent and 200 casual staff.

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

In May 2022, Siemens Energy announced its tender offer to acquire all remaining shares in Siemens Gamesa. The tender offer concluded in December 2022, and following a corresponding purchase order, Siemens Energy held around 98% of Siemens Gamesa shares. In June 2023, the minority shareholders of Siemens Gamesa approved a capital reduction, thus paving the way for the company's full integration into Siemens Energy, which now holds 100% of the Siemens Gamesa shares.

Siemens Energy changed its corporate and reporting structure as of fiscal year 2023. As a result, the former Divisions of the reportable segment Gas and Power (GP) have been newly structured into:

1. **Gas Services (GS)** (bundles all business activities related to gas turbines, large steam turbines, large generators, and heat pumps, including instrumentation and controls),
2. **Grid Technologies (GT)** (includes high-voltage direct current transmission systems, offshore windfarm grid connections, flexible AC transmission systems, high-voltage substations, air- and gas-insulated switchgear, transformers, digital grid solutions and components, as well as storage solutions),
3. **Transformation of Industry (TI)** includes electrolyzers, industrial steam turbines up to 250 MW,

industrial generators, turbo and reciprocating compressors including compression trains, systems, and solutions as well as services for the full portfolio and

4. **Siemens Gamesa** (onshore and offshore wind turbines and service)

which form the four Business Areas of the Siemens Energy Group.

Our company structure



### Operations

Siemens Energy is one of the largest suppliers of technology in the energy and electricity sector, serving the entire scope of the energy market. With our broad portfolio of products, solutions, and services, we cover almost the entire energy value chain – from low- or zero-emission power generation, transmission, and storage to reducing greenhouse gas (GHG) emissions and optimizing energy consumption in industrial processes, complemented by a wide range of training and service offers. This portfolio allows us to address the different speeds at which the energy transition is moving forward.

#### Solutions across the entire energy value chain



Siemens Energy Pty Ltd sells Siemens Energy products solutions and services. Siemens Gamesa is currently run and reports for modern slavery separately.

### Supply Chain

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

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

The services that we provide include supply of labour that is sourced mainly in Australia, although some specialist Engineers are sourced from Siemens Energy Group Companies also located in Europe, North America and Asia and from other suppliers.

Depending on the nature of the supply of products and services, Siemens Energy Pty Ltd may have different contractual relationships with suppliers. These may vary from

single transactions to multi-year relationships. Contractual arrangements will be different depending on the circumstances, and include purchase orders, master procurement agreements, framework agreements (local and global) and subcontracts.

Siemens Energy Pty Ltd's other business relationships include customer product, solution and service contracts, as well as consortium agreements from time to time with third parties (which allocate the scope of supply under a customer contract).

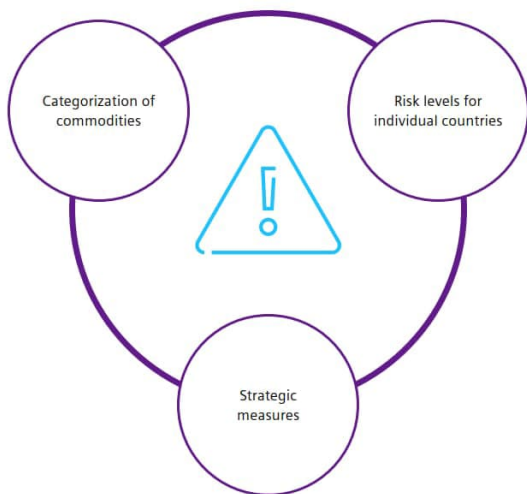
### 3. Risks of Modern Slavery Practices in the Operations and Supply Chains

Operational risks of modern slavery practices identified by Siemens Energy Pty Ltd include services performed by low skilled workforces, such as cleaning and manual labour, where there may be a risk of migrant labour exploitation (minimum wages may not be paid), or where excessive or unreasonable hours might be expected of supplier's employees. We consider these risks to be low in our business.

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

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

#### Cornerstones of our risk analysis system



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

#### Business Conduct Guidelines

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

#### Supply Chain Management

It is not only we ourselves who shape the sustainability of our operations but also our approximately 30,000 suppliers across 135 countries worldwide. Negative impacts in our supply chain, whether environmental or social, can quickly reflect on us and thereby harm our processes, reputation, and, ultimately, financial performance. With a Siemens Energy groupwide procurement volume of €23.5 billion in fiscal year 2023 (fiscal year 2022: €21.5 billion), it is crucial that we manage our supply chain sustainably, transparently, and responsibly to make it more resilient. For these reasons, responsible sourcing is one of the material topics in our sustainability approach. We aim to achieve our goals through strong relationships with suppliers that share our values and are equally committed to the protection of human rights, fair labour practices, anti-corruption measures, and the environment.

By anchoring sustainability criteria in the selection, qualification, assessment, and development of our suppliers, we are also contributing to the UN SDGs. We see our biggest contributions to SDG 8 "Decent Work and Economic Growth" and SDG 12 "Responsible Consumption and Production."

To contribute to these SDGs, we carefully consider labour conditions throughout upstream production processes and monitor the impact of our activities closely.

#### Binding Code of Conduct for suppliers

All suppliers and third-party intermediaries sign the Code of Conduct (CoC) for Suppliers and Third-Party Intermediaries in order to do business with the Siemens Energy Group. It is based on the Business Conduct Guidelines (BCG) and the Principles of the UNGC.

The CoC requires specific environmental, compliance, and labour standards to be established across all countries of operations. In fiscal year 2023, we expanded our CoC to



include all aspects of the German Supply Chain Due Diligence Act<sup>1</sup>. It now covers the following topics:

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

### Supplier assessment

#### Sustainability Self-Assessments

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

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

Compared with fiscal year 2022, the number of SSAs increased by 97% to 6,819 conducted self-assessments. This can be explained by the extension of the process to all countries of Siemens Energy (excluding Siemens Gamesa), that increased the number of self-assessments, as well as the roll out of the ESG Risk and Performance Management Framework.

Furthermore, the Siemens Energy Group conducts quality audits that include questions about sustainability, covering major aspects and requirements of the CoC. In fiscal year 2023, 740 on-site audits worldwide, compared to 961 supplier quality audits in fiscal year 2022 were conducted. This decrease was due to Siemens Gamesa's integration of Senvion and Adwen and the smaller backlog of supplier qualifications.

Sustainability self-assessments (SSAs) <sup>1</sup>	Fiscal year	
	2023	2022
<b>Number</b>		
Europe, C.I.S. <sup>2</sup> , Africa, Middle East	3,604	1,256
Americas	1,442	768
Asia, Australia	1,773	1,442
<b>Total</b>	<b>6,819</b>	<b>3,466</b>
<b>Improvement measures<sup>3</sup> agreed upon</b>		
Legal compliance/prohibition of corruption and bribery	1,407	305
Respect for the basic human rights of employees	667	154
Prohibition of child labor	0	7
Health and safety of employees	1,393	282
Environmental protection	1,940	455
Supply chain	1,110	150
Responsible minerals sourcing	161	9
<b>Total</b>	<b>6,678</b>	<b>1,362</b>

<sup>1</sup> Siemens Energy (excluding Siemens Gamesa): To be conducted by all suppliers with a purchasing volume > €10,000 p.a.; Siemens Gamesa: To be conducted mainly by suppliers from non-OECD countries with a purchasing volume > €50,000 p.a. Questionnaires initiated and completed in the year under review.

<sup>2</sup> Commonwealth of Independent States.

<sup>3</sup> Improvement measures agreed with suppliers relate either to actual deviations from the Code of Conduct for Suppliers and Third-Party Intermediaries or to structural improvements to management systems and a lack of specific processes and guidelines at the supplier. Siemens Gamesa data reported from May 2022 onward.

### External Sustainability Audits

The Siemens Energy Group sees external sustainability audits (ESAs) as the most effective means of reviewing our suppliers sustainability performance. Focusing on quality and objectivity, external audit partners conduct the ESAs. Repeat or follow-up audits are conducted if necessary. In fiscal year 2023, the Siemens Energy Group conducted 194 ESAs. This number increased from 167 audits in fiscal year 2022. Furthermore, the Siemens Energy Group accepted 71 ESAs of suppliers that were audited by other companies. We only accept audits that fulfill our requirements and where the full audit documentation is provided to us.

Throughout the supplier assessment processes, Siemens Energy remains committed to the partnership with our suppliers and to helping them improve. However, if problems persist and/or the suppliers do not show a willingness to take necessary corrective action, we remove them from our list of approved suppliers.

<sup>1</sup> Lieferkettensorgfaltspflichtengesetz (LkSG)

All local instances of blocked suppliers are reported to Corporate Procurement, which discusses and decides on the need for a worldwide block. In fiscal year 2023, no supplier was dismissed, since all suppliers with negative results are collaborating and implementing corrective actions.

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

To inform Siemens Energy employees, suppliers, and further external stakeholders, a web-based training course that explains Siemens Energy’s approach to promoting sustainability in its supply chain is published on Siemens Energy’s website.

External sustainability audits (ESAs)	Fiscal year	
	2023	2022
<b>Number</b>		
Europe, C.I.S. <sup>1</sup> , Africa, Middle East	77	61
Americas	21	16
Asia, Australia	96	90
<b>Total</b>	<b>194</b>	<b>167</b>
<b>Improvement measures<sup>2</sup> agreed upon</b>		
Legal compliance/prohibition of corruption and bribery	395	392
Respect for the basic human rights of employees	1,034	915
Prohibition of child labor	23	27
Health and safety of employees	933	895
Environmental protection	36	52
Supply chain	97	111
<b>Total</b>	<b>2,518</b>	<b>2,392</b>
<b>Accepted ESAs</b>	<b>71</b>	<b>76</b>

<sup>1</sup> Commonwealth of Independent States.

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

### Supplier sustainability assessments



### Responsible minerals sourcing

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

When surveying our approximately 1,400 (fiscal year 2022: 1,600) relevant suppliers, Siemens Energy uses the RMI’s Conflict Minerals Reporting Template to obtain the necessary information on smelters producing tin, tantalum, tungsten, and gold (3TG). Siemens Energy is actively involved in the Responsible Minerals Assurance Process by screening smelters for eligibility and encouraging uncertified smelters to take part in the RMI’s assessment programs. All newly reported smelters are shared with the RMI.

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

abuses, Siemens Energy also conducts a specific mineral risk assessment to identify other relevant minerals apart from 3TG. After cobalt, copper, and rare earths, we added mica to our supply chain due diligence processes according to the 5-step framework of the OECD Due Diligence Guidance. In addition to our RMI membership (member of the RMI Steering Committee) and strategic partnership with the European Partnership for Responsible Minerals, where we are a member of the governance board, we are actively engaged in Copper Mark, an assurance framework promoting the responsible production of copper.

### Implementation in Australia

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

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

The risk of modern slavery is also addressed during the employee onboarding process which includes background checks such as right to work in Australia, age verification and qualifications for the relevant tasks prior to undertaking work on behalf of Siemens Energy Pty Ltd. A global external partner is engaged to provide technical advice and support on visas for international personnel entering countries in which we operate. This ensures that they are being treated fairly and safely both by their overseas employers and by Siemens Energy Pty Ltd while working on our projects.

### Occupational Health & Safety

Providing a safe and healthy working environment for all employees, partners, contractors and suppliers is one of our key objectives. Having a sound occupational health and safety (OHS) approach is also vital to achieve the two SDGs to which we are committed in this regard: SDG 3 "Good Health and Well-Being" and SDG 8 "Decent Work and Economic Growth".

Our standards for environment, health and safety (EHS) are anchored in all our business practices and are aligned with our EHS Principles and Core Responsibilities as well as our Business Conduct Guidelines (BCG). At Siemens Energy we use these as a foundation for the development of our EHS management approach and processes.

To support the fundamental requirements for good OHS, our EHS Policy aligns with our company principles and behaviours demonstrating:

- Strong leadership, ownership and commitment
- Promotion of good health and safety conduct
- Commitment to continuous improvement
- Hazard identification, risk assessment and prevention
- Compliance with principles, standards and behaviours

### Channels for reporting misconduct

The Siemens Energy Group offers all employees and external third parties various confidential channels for reporting potential violations. This helps identify and eliminate misconduct. It also protects whistleblowers and the company from damage that may result. Such channels include:

- Managers
- Group Compliance Officer
- Compliance department and Legal department
- Human Resources department
- "Speak Up" and "Integrity Hotline" whistleblower channels
- Ombudsperson
- Employee representatives

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

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

## 5. How we assess the Effectiveness of these Actions

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

Siemens Energy Pty Ltd conducts reviews with executive management to ensure that there is an awareness and alignment on the processes implemented and future activities with regards to modern slavery risks across our business. This achieves both endorsement and awareness while providing support to ensure that this important topic is addressed thoroughly.

This is supplemented by cross-functional reviews between the Supply Chain Management, Compliance and Legal teams, which are both formal and informal to align and ensure that the different functions of the business are aware of progress and to allow updates. We will continue to monitor and review processes and procedures to ensure progress including promotion of awareness of the topic of Modern Slavery and why it is important to address.

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

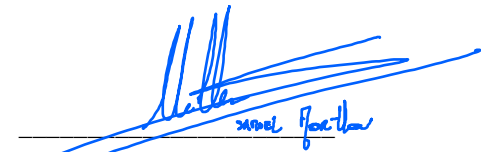
Siemens Energy Pty Ltd does not own or control any entities however this statement is aligned with the Siemens Energy Group Sustainability Report 2023 and the actions outlined in that report to address Modern Slavery Risks. As stated above these include globally mandated processes and practices applicable to all Siemens Energy Group companies including Siemens Energy Pty Ltd (noting that Siemens Gamesa Renewable Energy Pty Ltd files a separate modern slavery report).

## 7. Any Other Relevant Information

The Siemens Energy Group commitment to sustainability and its contribution to the United Nations' Sustainable Development Goals (including sustainable supply chains and human rights) are set out in the Siemens Energy Sustainability Report 2023 [Sustainability at Siemens Energy \(siemens-energy.com\)](https://www.siemens-energy.com/global/en/home/supplier/sustainability-in-the-supply-chain.html) and <https://www.siemens-energy.com/global/en/home/supplier/sustainability-in-the-supply-chain.html>

7.2. Further detail regarding the Siemens Energy Group Compliance program, its Human Rights Policy Statement and FY 2023 Report on the LkSG (Supply Chain Due Diligence Act) please refer [Compliance \(siemens-energy.com\)](https://www.siemens-energy.com/global/en/home/supplier/sustainability-in-the-supply-chain.html)

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



Samuel Morillon  
Managing Director and CEO

Digitally signed by Bertolotti Felice Michael  
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Michael Bertolotti  
Director and CFO