

2022 Statement on the Prevention of Slavery and Human Trafficking by Siemens Gamesa Renewable Energy Limited (the “Company”)

Introduction

This statement is made pursuant to s54 of the Modern Slavery Act (the “Act”) and sets out the steps which the Company has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within the Company’s supply chain.

During financial year ending on 30th September 2022, the Company has continued to follow the Siemens Gamesa Renewable Energy S.A. (“SGRE”) global guidelines and codes of conduct, including the SGRE Business Conduct Guidelines and the SGRE Code of Conduct for Suppliers and Third Party Intermediaries.

At the end of calendar year 2022, the Siemens Energy Group launched a takeover offer for the shares in SGRE which it did not already own. As a result, the Siemens Energy Group increased its shareholding in SGRE to over 92% and SGRE was delisted on 14th February 2023. During the course of 2023, steps will be taken to integrate SGRE and the Siemens Energy Group. In the meantime, the Company will continue to follow the SGRE global guidelines and codes of conduct, including the SGRE Business Conduct Guidelines and the SGRE Code of Conduct for Suppliers and Third Party Intermediaries.

Our commitment

The Company fully supports the aims of the Act and is committed to operating free from forced labour, slavery and human trafficking. We have a zero tolerance approach to forced labour, slavery and human trafficking in any form, in any part of our business or supply chain.

As part of the worldwide SGRE group of companies, sustainable practices are firmly anchored in our corporate culture. We apply globally-binding principles that require all employees and managers to behave in an ethical, law-abiding manner. We act responsibly to support economic, environmental and social progress.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent way, such policies include:

1. Business Conduct Guidelines

All of our employees are required to comply with our Business Conduct Guidelines which commits each of them to respect the personal dignity, and personal rights of every individual, as well as to act with integrity and in accordance with the law.

SGRE is a member of the United Nations Global Compact and our Business Conduct Guidelines require that our employees recognise and apply globally-relevant anti-slavery principles, including the International Labour Organisation’s Tripartite Declaration of Principles, and its Declaration on Fundamental Principles and Rights at Work, in particular with respect to the elimination of child labour, abolition of forced labour, prohibition of discrimination, and rights to freedom of association and collective bargaining.

Each employee is required to sign a statement that they have read and understood the Business Conduct Guidelines as part of our recruitment process.

2. Whistle-blower Policy

Our compliance organisation operates in accordance with the three cornerstones of “prevent-detect-respond” to ensure that SGRE, the Company and its employees act in accordance with law as well as internal policies such as the Business Conduct Guidelines. Prevent includes risk management, training and communication to ensure awareness. Detect includes tools to ensure the early detection of any compliance violations and includes our Integrity Hotline. Our Integrity Hotline is a whistleblower tool that offers the opportunity to report compliance violations in a secure matter 24 hours a day, 7 days a week, in 13 languages, online or via telephone. It is available to all employees as well as customers, suppliers and other stakeholders. Respond ensures that there are clear and unambiguous actions taken where instances of compliance violations are found.

Link to Integrity Hotline:

<https://www.bkms-system.net/bkwebanon/report/clientInfo?cin=23wd4&language=eng>

3. Recruitment

The Company operates a robust recruitment policy, including eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

Our supply chain

Our Code of Conduct for suppliers and third-party intermediaries sets out the standards of ethical, lawful and sustainable conduct we expect from our suppliers and business partners.

We require commitment to our Code of Conduct from our suppliers and third-party intermediaries and have made it a mandatory element at the beginning of our Supplier Management processes. All our supply contracts include the Code of Conduct as an annex to remind suppliers of their commitment to the Code of Conduct. We have made the Code of Conduct available in a number of languages to assist suppliers and third-party intermediaries.

Our Code of Conduct prohibits the use of forced labour and child labour by our suppliers, requires our suppliers to respect the employment rights of their workers and requires our suppliers to use reasonable efforts to promote compliance with the Code of Conduct amongst their own suppliers.

The principles underlying our Code of Conduct are based on the UN Global Compact relating to human rights, labour standards, environmental protection and anticorruption initiatives. These principles are derived from the Universal Declaration of Human Rights, the Declaration on Fundamental Principles and Rights at Work of the International Labour Organisation and the principles of the Rio Declaration on Environment and Development.

We verify that our suppliers comply with our Code of Conduct through use of a risk based system to identify potential areas for concern. The Integrity Hotline, set out above, can also be used to report concerns in relation suppliers and third-party intermediaries. Where a concern is identified a supplier quality audit would be instigated, including corporate responsibility content and compliance with the Code of Conduct, with appropriate actions taken depending on the outcome of the audit.

More details of how we operate our supplier management processes to ensure compliance, including our Code of Conduct, can be viewed at:

<https://www.siemensgamesa.com/en-int/sustainability/suppliers>

https://www.siemensgamesa.com/en-int/-/media/siemensgamesa/downloads/en/sustainability/code-of-conduct/code_of_conduct_for_suppliers_and_third_party_intemediaries_en.pdf

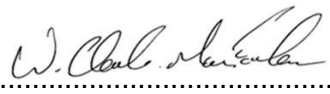
(download Code of Conduct Brochure)

Our commitment

The Company will not tolerate any violations of applicable law – and if it does happen, we will take action. We will continue to apply a zero-tolerance approach to forced labour, slavery and human trafficking in any form, in our business and supply chain.

Approval of this Statement

This statement has been approved by the board of Directors of the Company on 30th March 2023, with respect to the financial year ending on 30 September 2022.

Signed: 
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Name: WC MacFarlane, Director

Date: 31st March 2023

