

# Siemens Gamesa Renewable Energy Limited

## Modern Slavery Act Statement

Financial Year Ended 30<sup>th</sup> September 2024

### Introduction

This statement is made pursuant to s54 of the Modern Slavery Act 2015 (the “Act”) and sets out the steps which Siemens Gamesa Renewable Energy Limited has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or our supply chain.

During the financial year ending on 30th September 2024, Siemens Gamesa Renewable Energy Limited has continued to follow the Siemens Gamesa Renewable Energy S.A.U. (“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.

During 2025, steps will continue to complete the full integration of SGRE and the Siemens Energy Group following the delisting and completion by the Siemens Energy Group of its takeover of SGRE. Prior to the integration, Siemens Energy Renewable Energy Limited 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

Siemens Gamesa Renewable Energy Limited 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.

Siemens Gamesa Renewable Energy Limited is committed to embracing and supporting, 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.

As part of the worldwide SGRE, and now Siemens Energy, 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:

### **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.

### **Compliance policy**

This globally binding all-encompassing compliance policy sets out the organisation's stance on Anti-Corruption, Anti-Trust, Anti Money Laundering, Data Protection, Human Rights and Export Control.

The global policy specifically highlights the need to comply with local law and thereby the requirements of the Modern Slavery Act. In particular, it requires all business units and employees to act always in accordance with the United Nations Global Compact principles.

Link to information about the Siemens Energy Compliance Programme: <https://www.siemens-energy.com/global/en/company/about/compliance.html>

### **Whistle-blower Policy**

Our compliance organisation operates in accordance with the three cornerstones of "prevent- detect-respond" to ensure that SGRE, Siemens Gamesa Renewable Energy Limited and its employees act in accordance with law as well as internal policies such as the Business Conduct Guidelines. Detect includes tools to ensure the early detection of any compliance violations and included, during the financial year ended 30<sup>th</sup> September 2024, the SGRE Integrity Hotline. Our Integrity Hotline is a whistleblower tool that offers the opportunity to report compliance violations online in a secure matter 24 hours a day, 7 days a week, in thirteen languages.

From 1st October 2024, Siemens Gamesa Renewable Energy Limited has moved to the Siemens Energy "Speak Up" tool. In addition, the external and independent Siemens Energy Ombudsperson will be available for the reporting of compliance violations: [Reporting Channels „Speak Up“ and Ombudsperson](#)

Employees who report compliance violations at Siemens Gamesa Renewable Energy Limited are protected by guidelines which prohibits retaliatory sanctions for reports are made in good faith.

## Recruitment Policy

Siemens Gamesa Renewable Energy Limited operates a robust recruitment policy, including conducting 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 is 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:

[SGRE Sustainability](#)

[SGRE Supplier Code of Conduct](#)

## Employee Training

Siemens Gamesa Renewable Energy Limited makes available several online training modules, such as "Sustainability in the Supply Chain" and "Correct Purchasing" for our employees. This training is mandatory for all employees with purchasing responsibility and highlights the importance of the "Siemens Gamesa Renewable Energy Code of Conduct for Suppliers and Third-Party Intermediaries." Completion forms part of an employee's annual performance targets and therefore subject to formal monitoring. During 2025, all SGRE employees will be integrated into the Siemens Energy Learning Platform which manages mandatory Compliance training.

# Our Commitment

Siemens Gamesa Renewable Energy Limited 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. Integration of Siemens Gamesa Renewable Energy Limited’s Compliance systems with those of Siemens Energy will continue in the forthcoming financial year.

# Approval of this Statement

This statement has been approved by the Board of Directors, with respect to the financial year ending on 30 September 2024.



28 Jan, 2025 2:35:40 PM GMT

Darren Davidson (Director)



28 Jan, 2025 1:22:14 PM GMT

Ross Dean (Director)

Date \_\_\_\_\_