

# HUMAN RIGHTS POLICY

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## AIM, PURPOSE AND SCOPE

The purpose of this Policy is to communicate to the Nordex Group (hereinafter also referred to as Nordex) and its employees, customers, suppliers, shareholders, and the communities where we operate, the ethical and social values we respect and seek to uphold throughout our business decisions, activities, and partnerships. As an umbrella policy, it can be concretized by further human rights-related policies and procedural instructions.

This Policy outlines the commitment of the Nordex Group to respecting human rights and values of Integrity, Respect, Colleagueship and Ownership, as reflected in the Nordex Code of Conduct documents and which are the unifying force for all departments and regions around the world.

Upholding international recognised laws and frameworks and all relevant national laws where Nordex operates.

## WHAT ARE HUMAN RIGHTS?

Human rights are the basic rights and freedoms that belong to every person in the world. They are based on shared values like dignity, fairness, equality, respect, and independence. In many countries where we operate, these values are defined and protected by law. In some countries, however, this is not the case. Where national law and international human rights standards differ, Nordex will follow the higher standard. Where they are in conflict we will adhere to national law, whilst seeking ways to respect international human rights to the greatest extent possible.

## COMMITMENTS AND PRINCIPLES

In line with the United Nations Guiding Principles on Business and Human Rights (UNGPs) we at Nordex are committed to the United Nations Universal Declaration of Human Rights, the International Labour Organisation's (ILO) core labour standards and the ILO's Declaration on the Fundamental Principles and Rights at Work. We follow the OECD Guidelines for Multinational Enterprises and the principles outlined in the UN Global Compact, as well as international legislation where we operate. We at Nordex will:

- Commit to performing our business to the abovementioned standards of ethics in accordance with our values and the laws where we operate.
- Be open and fair in dialogue with all our stakeholders and commit to communicating effectively with external parties, ensuring there is trusted and accessible consultation mechanisms available.
- Work to address key issues relevant to our sector, business activity and supply chains including: modern slavery and exploitative labour practices, child labour, all forms of discrimination, fair wages, working hours and conditions, health, and safety, right to freedom of association.
- Continue to develop our due diligence processes to provide more insight to help identify risks and ensure we understand the best approaches to preventing and mitigating risks to people.
- Not tolerate, nor condone abuse of human rights within any part of our business or supply chains, and we will take any allegations of abuse seriously. As part of this we will work to ensure effective provision of remedy wherever human rights occur through company-based grievance mechanisms.

## IMPLEMENTATION

### Leadership and governance:

We recognise that our success is based on a corporate culture that embeds responsible business into everything we do, and our leaders are responsible for providing direction and clarity as well as role-modelling behaviour. We are working to integrate human rights considerations effectively into business decisions and this covers our own operations, as well as supplier and customer relationships. We are also considering human rights aspects in our internal risk governance processes, providing clear reporting lines to employees and suppliers.

### Capacity building:

Adequate training of employees on human rights and the respective Nordex key processes is essential to our success in preventing and mitigating risks for violation of human rights. We will provide training to key employees responsible for ensuring we meet our commitments on human rights.

### Due diligence:

A significant share of our added value is created in the pre-production phases. We therefore see it as vital to ensure that our own environmental and social standards are maintained throughout our supply chain. Furthermore, we understand that human rights due diligence is an ongoing process that requires particular attention at certain stages in our business activities, such as when we form new partnerships, or our operating conditions change.

Improving the accessibility and trust of our grievance mechanisms and ensuring rightsholders and stakeholders can help us identify, prevent, and mitigate risks and where necessary provide appropriate remedy for impacts that have already occurred. We are therefore working to improve the scope, understanding and accessibility of our grievance mechanism so it is more widely used to support the reporting of human rights issues and improvement of the relevant parts in the Nordex human rights risk management program.

We use an internal controls as well as Due Diligence mechanism for our own activities as well for the activities for our Suppliers. , referring which will ensure that in each of our respective countries, all of the commitments of our policy are observed. This will be signed each year by our local People and Culture managers in each country that Nordex operates in.

### Driving forward change:

We believe working on human rights is a journey that constantly evolves and changes depending on emerging legislation, best practice, and world events. Therefore, we are investigating different methods available to businesses to drive forward change within our business and across the wind sector to ensure continuous improvement, such as expanding our onboarding and supplier due diligence.

## HOW TO REPORT A CONCERN OR ASK A QUESTION?

If any employee of the Nordex Group believes that someone or any kind of practise of the Nordex Group or of our business partners is violating the Human Rights Policy or any related laws or regulations, they are required to report it immediately to their manager or the local person in charge.

Our suppliers, contractors, customers or any other persons are asked to report suspected violations to the Nordex manager in charge, to their contact person at Nordex or use the Nordex Group Whistleblower System 'notify!' (<https://nordex.whistleblownetwork.net/>).

## RESPONSIBILITY

The Board of Nordex is responsible for ensuring adherence to these commitments and our senior management has responsibility for overseeing their implementation and ensuring that any breaches of this Policy or any of its related policies and procedures are investigated.



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CEO



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SVP People & Culture

28 October 2021, Hamburg