

FORCED LABOR & MODERN SLAVERY POLICY THE NORDEX GROUP



Forced Labor & Modern Slavery Policy

AIM, PURPOSE AND SCOPE OF THE POLICY

The Forced Labor & Modern Slavery Policy describes the Nordex Group's aim and objectives in eliminating any form of forced labor and modern slavery at the Nordex Group, at its partner organizations, and in its value chain.

The policy applies to all employees of the Nordex Group in any capacity and location, and to subcontractors, suppliers and partner organizations of the Nordex Group or any of its agencies.

VALIDITY

Global <input checked="" type="checkbox"/>	Europe <input type="checkbox"/>	International <input type="checkbox"/>
Countries	//	
Valid from	01.01.2025	
Responsible department	Sustainability	
Owner	Bernd Bruhns (Human Rights Officer)	
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INTRODUCTION

As a manufacturer of innovative onshore wind turbines, the Nordex Group works with its customers to continually increase the share of renewable energies in the global energy mix. Sustainability is at the core of the Nordex Group's business model, being essential not only to the Nordex Group's commercial future, but also for preserving our environment for future generations.

The Nordex Group is committed to the idea that green energy businesses should also be accountable for their impact on people, including the workers in our supply chains and the communities in which we operate.

The Nordex Group does not tolerate any form of forced labor and modern slavery in its own operations, at its partner organizations, and in its value chain. This policy describes how the Nordex Group addresses this.

WHAT IS FORCED LABOR AND MODERN SLAVERY?

Forced labor and modern slavery are crimes and violations of fundamental human rights. They include various forms of coercive practices of work or services extracted from persons that have not offered the work or services voluntarily. They include slavery, servitude, forced and compulsory labor and human trafficking. All of them mean a deprivation of persons' liberty, to exploit them for personal or commercial gains.

Forced labor and modern slavery are defined and addressed in fundamental conventions, regulations, and legislation on international, multinational, and national level:

The International Labour Organisation addresses forced labor in three fundamental conventions: the ILO Convention No. 29 on Forced Labour, the ILO Protocol to the Forced Labour Convention 2014 (P029), and the ILO Abolition of Forced Labour Convention (No. 105).

- ILO Convention No. 29 defines forced labor as "all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily."
- The Preamble to the ILO 2014 Protocol to Convention No. 29 on forced labor states that forced labor constitutes a serious violation of human dignity and fundamental human rights. For the ILO, eliminating all forms of forced or compulsory labor is a principle which concerns the fundamental rights.

The European Union's Charter of Fundamental Right explicitly prohibits forced labor in Article 5(2). The EU also provides the Guidance on Due Diligence for EU Businesses to Address the Risk of Forces Labour in their Operations and Supply Chains.

The Directive (EU) 2024/1760 on Corporate Sustainability Due Diligence (CSDDD) addresses

- "All forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom, as well as forced or compulsory labor, including the forced or compulsory recruitment of children for use in armed conflicts;"



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- The “prohibition of forced or compulsory labour, which means all work or service that is exacted from any person under the menace of any penalty and for which the said person has not offered himself or herself voluntarily, for example as a result of debt bondage or trafficking in human beings, interpreted in line with Article 2(1) of the International Labour Organization Forced Labour Convention, 1930 (No 29). Forced or compulsory labour shall not mean any work or services that comply with Article 2(2) of the International Labour Organization Forced Labour Convention, 1930 (No 29) or with Article 8(3), points (b) and (c) of the International Covenant on Civil and Political Rights;” and the
- “Prohibition of all forms of slavery and slave-trade, including practices akin to slavery, serfdom or other forms of domination or oppression in the workplace, such as extreme economic or sexual exploitation and humiliation, or human trafficking, interpreted in line with Article 8 of the International Covenant on Civil and Political Rights.”

Several countries set up national law which explicitly addresses modern slavery and forced labor in business conduct and supply chains, such as Australia (Modern Slavery Act, 2019), Canada (Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act 2024), USA (US Uyghur Forced Labor Prevention Act, 2022), France (Duty of Vigilance Law, 2017), Germany (German Supply Chain Act, 2023), and United Kingdom (Modern Slavery Act, 2015).

THE NORDEX GROUP APPROACH

Our zero-tolerance policy

We, the Nordex Group, have zero-tolerance against any form of forced labor and modern slavery as defined in the documents above. To this end we are committed to acting ethically and with integrity and transparency in all our business dealings. In particular,

- We do not use any prison labor,
- All our workers have the right to enter employment voluntarily and freely, without the threat of a penalty. All workers have the freedom to terminate employment, by means of notice of reasonable length, at any time without penalty,
- We do not allow the use or threat of physical or sexual violence, harassment or intimidation against workers, their families or close associates,
- We do not use irregular, delayed, deferred or non-payment of wages as a means to bind workers to us. No non-cash or “in-kind” payments are used as a means to create a state of dependency of the worker on the company,
- Our workers are never required to pay a fee to us or an intermediary to get hired, and
- Our workers retain control of their personal documents, such as birth certificates, passports, work permits, residence permits, or identity cards

Regional recruitment procedures ensure that we operate a robust recruitment procedure in all countries in which we operate, including eligibility checks for all employees



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to safeguard against human trafficking or individuals being forced to work against their will.

Our subcontractors and suppliers are required to commit to our Code of Conduct for Contractors and Suppliers in writing, which forms part of our contracts with them. In agreeing to it, they commit to prohibit and refrain from using any kind of forced labor and modern slavery. We expect from our subcontractors and suppliers that they ascertain these principles also at their own subcontractors and suppliers, and that those comply with the said principles set out hereinabove.

Governance & Implementation

The Nordex Group operates globally as a matrix organization with strong centralized corporate functions, global policies, and a high level of sharing of expertise, technology, and human and financial resources between companies within the Group.

To tackle forced labor and modern slavery throughout our supply chains, we are committed to ensuring there is transparency in our business and in our approach. Our processes for human rights related due diligence in our operations and in our value chain build on the OECD due diligence approach for responsible business conduct. We constantly revise these processes for improvement potentials and for comprehensive implementation of due diligence, and for addressing the relevant legal requirements.

We aim to embed the zero-tolerance policy against forced labor and modern slavery in all our business processes and management systems. To this end, we operate group-wide internal policies and Codes of Conduct to ensure that we are conducting business in an ethical and transparent manner.

These include the

1. Human Rights Policy of the Nordex Group,
2. Forced Labor & Modern Slavery Policy (current document),
3. Code of Conduct for Employees, and the
4. Code of Conduct for Contractors and Suppliers.

In these documents we expect the relevant target groups to adhere to the principles of integrity and ethical, lawful conduct, and for subcontractors and suppliers, throughout the entire duration of their business relationship with us. They define our labor and human rights expectations and require full compliance with them.

We expect the same high standards from all our subcontractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude, whether adults or children. We expect that our subcontractors, suppliers, and other business partners will hold their own suppliers to the same high standards.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal.

We may terminate the relationship with other individuals and organizations working on our behalf, and with subcontractors or suppliers, if they breach this policy.



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HOW TO REPORT CONCERNS OR RISKS

The Nordex Group employees, our business partners' employees, and the general public can use the "[notify!](#)" whistleblower system to report any suspected compliance violation, including those related to forced labor and modern slavery, in connection with the Nordex Group's business activities. "[notify!](#)" allows anonymous reporting and communication, unless prohibited by the laws of the country where the matter is reported.

The Nordex Group takes each complaint very seriously and acts through a defined standard process for validation, investigation, and conclusion, which ensures a proper and timely handling of concerns.

RESPONSIBILITY

The Board of the Nordex Group is responsible for ensuring adherence to the commitments outlined above. 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.

Hamburg, 01 January 2025

Management Board

A blue ink signature of José Luis Blanco, consisting of stylized initials.

José Luis Blanco (CEO)

A blue ink signature of Dr Ilya Hartmann, consisting of stylized initials.

Dr Ilya Hartmann (CFO)