

# CODE OF CONDUCT FOR CONTRACTORS AND SUPPLIERS



## Code of Conduct for Contractors and Suppliers

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### Code of Conduct

This Code of Conduct sets out the binding principles for compliant and responsible behavior of the contractors and suppliers of the Nordex Group. The Code of Conduct for Contractors and Suppliers will take effect from 01 May 2024.

#### VALIDITY

<b>Global</b> <input checked="" type="checkbox"/>	Europe <input type="checkbox"/>	<b>International</b> <input type="checkbox"/>
<b>Countries</b>	//	
<b>Responsible department</b>	<b>Sourcing Excellence and Governance</b>	
<b>Owner</b>	<b>Wim Geldhof</b>	
<b>Author</b>	<b>Elsa Schäfer, Ming Chua</b>	



## Code of Conduct for Contractors and Suppliers

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<b>Message to our Contractors and Suppliers</b>	<b>3</b>
<b>1. Code of Conduct for Contractors and Suppliers</b>	<b>4</b>
1.1. Business Integrity	4
1.2. Quality, Health & Safety	4
1.3. Labor and Human Rights	4
1.4. Environment	5
1.5. Conflict Minerals	5
1.6. Society	5
1.7. Supply Chain	5
1.8. General provisions	6
<b>2. The Nordex Group Whistleblower System "<i>notify!</i>"</b>	<b>7</b>
<b>3. Acknowledgement and Consent</b>	<b>8</b>



## Code of Conduct for Contractors and Suppliers

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### **MESSAGE TO OUR CONTRACTORS AND SUPPLIERS**

Dear Contractor, Dear Supplier,

At the Nordex Group, we are proud of our 35-year history of harnessing wind power for a sustainable world. Our success is due to our passion, technical expertise, and commitment to our core values of integrity, respect, collegueship, and ownership. As one of the world's largest onshore wind turbine manufacturers, we have built a global reputation based on ethical and law-abiding practices.

Maintaining this reputation is essential to the trust placed in us by our customers, shareholders, business partners, and the public. To ensure that we continue to do the right thing in our day-to-day business and throughout our value chain, we are committed to following the principles of Nordex Code of Conduct for own employees: [Code of Conduct Employees EN](#)

Our Code of Conduct sets out the principles of a compliant and responsible behavior for our contractors and suppliers in our supply chain. It serves as an ethical compass for our business relationship with you, our supplier. By adhering to these principles, you help protect our joint business and the community, ensuring the long-term sustainable success of our relationship.

We ask you to take these principles of good conduct to heart and follow them in your dealings with us. Thank you for your contribution to our joint success.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Wim Geldhof", with several horizontal lines drawn through it.

**Wim Geldhof**

Chief Procurement Officer



## Code of Conduct for Contractors and Suppliers

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# 1. CODE OF CONDUCT FOR CONTRACTORS AND SUPPLIERS

Ethics determine our course. This summarizes the values under which Nordex SE and the group of companies headed by Nordex SE in its capacity as ultimate parent company (altogether referred to as "the Nordex Group") are bound, based on the principles of compliance, integrity and ethical behavior. They apply to all employees, contractors, and suppliers.

As part of this, the Nordex Group expects from its contractors and suppliers (hereinafter "supplier") – throughout its complete business relationship with them – integrity and ethical law-abiding behavior as well as strict adherence to the principles set out in the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the International Labor Organisation's (ILO) core labor standards, and the ILO's Declaration on the Fundamental Principles and Rights at Work. This includes in particular:

### 1.1. Business Integrity

- Comply with all applicable laws and regulations.
- Do not tolerate, permit or engage in bribery, corruption associated with state agents and private-to-private corruption, collusion, insider trading, market manipulation or other stock market crimes, fraud, forgery, counterfeiting, tampering, money laundering or any other illegal and/or unethical practices.
- Support fair competition and avoid conflicts of interest.
- Comply with the use of institutional channels for communication with state agents.

### 1.2. Quality, Health & Safety

- Maintain a suitable and systematic approach to Quality, Health, and Safety (e.g., in accordance with ISO 45001/OHSAS 18001, ISO 9001, or national equivalent), designed to ensure compliance with all applicable laws and regulations and to achieve continuous improvement.

### 1.3. Labor and Human Rights

- Prohibit and refrain from any kind of forced labor, including any form of forced or compulsory labor, slavery and modern slavery, human trafficking, servitude, debt bondage, labor exploitation, verbal or physical humiliation, violence or coercion, mental abuse, sexual harassment, threat or intimidation, and any other abusive working conditions.
- Prohibit and refrain from any kind of child labor.
- Prohibit and refrain from disregarding the occupational safety and health obligations.
- Comply with all applicable laws and regulations on freedom of association and collective bargaining.



## Code of Conduct for Contractors and Suppliers

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- Promote equal opportunities and equal treatment.
- Do to not tolerate discrimination, harassment or retaliation.
- Fully comply with the applicable national statute on working time.
- Provide fair remuneration in line with the applicable national statute.
- Prohibit from unlawful eviction and unlawful taking of land, forests and waters in the acquisition, development or other use of land, forests and waters, the use of which secures the livelihood of a person.
- Prohibit from hiring or use of private or public security forces for the protection of the enterprise's project if, due to a lack of instruction or control on the part of the enterprise, the use of security forces is in violation of the prohibition of torture and cruel, inhumane or degrading treatment, damages life or limb or impairs the right to organize and the freedom of association.

### **1.4. Environment**

- Comply with all applicable national and international environmental regulations and standards.
- Maintain a suitable and systematic approach to Environmental management (e.g., in accordance with ISO 14001 or national equivalent), and to achieve continuous improvement.
- Reduce environmental impacts to a minimum. This applies in particular to the production, use and disposal of mercury (as defined by the Minamata Convention), persistent organic pollutants (as defined by the Stockholm Convention) and hazardous waste (as defined by the Basel Convention).

### **1.5. Conflict Minerals**

- Assess the usage of conflict minerals (at least those identified by applicable EU regulation, currently tantalum, tin, tungsten and gold, see EU regulation (EU) 2017/821) and investigate if they are sourced from conflict-affected and other high-risk areas (CAHRAs).
- Establish due diligence measures to ensure the compliance with all applicable regulatory requirements and to ensure that the sourcing of the minerals does not directly or indirectly finance or benefit armed groups in CAHRAs or is not connected to abuses of international law, including human rights violations or environmental infringements.

### **1.6. Society**

- Respect neighbors, local communities, and cultural heritage, and contribute positively to the societies in which the supplier operates.

### **1.7. Supply Chain**

- The Nordex Group expects from its suppliers that they ascertain that also their own subcontractors and suppliers comply with the said principles set out hereinabove.



## Code of Conduct for Contractors and Suppliers

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### **1.8. General provisions**

- The Nordex Group expects from its suppliers to provide upon request evidence of compliance with the requirements laid out in no. 1.1 to 1.7, and/or supporting documents, in course of due diligence and/or verification assessments.
- The Nordex Group reserves its right to change or supplement the requirements of this Code of Conduct.



## Code of Conduct for Contractors and Suppliers

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## 2. THE NORDEX GROUP WHISTLEBLOWER SYSTEM "NOTIFY!"

Committing to a speak-up culture, we have established the Whistleblower System "notify!" based on principles of trust, confidentiality, good faith, impartiality, and protection, with the purpose of encouraging and facilitating the reporting of any form of compliance violation related to the Nordex Group's business activities and its authorized representatives.

Every Nordex Group representative, external stakeholders – including the employees of suppliers at any stage of the supply chain – and the general public, be they personally concerned or not, can submit a report via "notify!". This Whistleblower System is open to all types of compliance violations, irrespective of topic. In addition, you can also submit observations of risks or violations regarding human rights, or environmental topics in case they are related to the Nordex Group or its supply chain.

The following contact options are available:

- **Online portal:** [Web-based publicly accessible portal](#) that can be accessed 24/7, 365 days a year from any computer with internet connection. Available in all company languages. Reports can be made anonymously, and full data security is guaranteed.
- **Helpdesk:** Direct dialogue via telephone, e-mail or post.
  - Phone: +49 (0) 40 30030 3030. Can generally be reached on weekdays from 9:00 a.m. to 5:00 p.m. (CET).
  - E-mail: [notify@nordex.whistleblowermail.com](mailto:notify@nordex.whistleblowermail.com)
  - Post: Nordex SE, Corporate Compliance, Langenhorner Chaussee 600, 22419 Hamburg, Germany.

We guarantee legally compliant processing of any reports, confidentiality at all levels, and effective whistleblower protection from retaliation, provided that the report is submitted in good faith. Any form of retaliation will be punished appropriately and could even lead to dismissal. The presumption of innocence and the rights of defense apply. Where this is not restricted by country-specific regulations, reports can be submitted anonymously.

All personal data is processed in accordance with the European General Data Protection Regulation (GDPR) and applicable local data protection regulations.

Further information on the Whistleblower System "notify!" can be found on the [Nordex homepage](#) under "Whistleblowing – Nordex Group Whistleblower System". Furthermore, under the same section, you can find the "Rules of Procedure for the Complaints Procedure pursuant to the German Supply Chain Act" which elaborates on reporting concerns related to human rights and environmental violations.





Code of Conduct for Contractors and Suppliers

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### 3. ACKNOWLEDGEMENT AND CONSENT

By signing this document, the supplier confirms acceptance of the Supplier Code of Conduct with the stated principles/requirements and will act responsibly accordingly. The supplier is also responsible for ensuring that their employees, agents, suppliers, subcontractors, and service providers understand the contents of the document and take necessary measures to implement the requirements.

Place, Date

Signature / Function

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