

POLICY STATEMENT OF  
NORDEX SE AND  
NORDEX ENERGY SE & CO. KG  
PURSUANT TO THE GERMAN  
SUPPLY CHAIN DUE  
DILIGENCE ACT (GSCA)  
**2025**



## GSCA: 2025 Policy Statement of Nordex SE and Nordex Energy SE & Co. KG

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### AIM, PURPOSE AND SCOPE

The document includes the Policy Statement required by the German Supply Chain Act (GSCA, Lieferkettensorgfaltspflichtengesetz – LkSG) of Nordex SE and its subsidiaries, and Nordex Energy SE & Co. KG, together: the Nordex Group.

It describes how the Nordex Group fulfils and implements the GSCA due diligence obligations, and it presents the results of the analysis of the GSCA related risks, and subsequent measures.

This version updates the Policy Statement of 15 November 2024 with the results of the GSCA risk analysis 2025, and with updated processes.

### VALIDITY

Global <input checked="" type="checkbox"/>	Europe <input type="checkbox"/>	International <input type="checkbox"/>
Countries	//	
Valid from	30.11.2025	
Responsible department	Global Sustainability	
Owner	Bernd Bruhns (Human Rights & Environmental Officer)	
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## INTRODUCTION

In line with the United Nations Guiding Principles on Business and Human Rights (UNGPs), we at the Nordex Group 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. The OECD Guidelines for Multinational Enterprises are a roadmap of our business conduct, and we apply national and international legislation wherever we operate. The details of our commitment are laid out in our Human Rights Policy.

This policy statement addresses the requirements of the German Supply Chain Due Diligence Act (GSCA, Lieferkettensorgfaltspflichtengesetz – LkSG), which is applicable to Nordex SE and its subsidiaries and Nordex Energy SE & Co. KG.<sup>1</sup> The statement lays out:

- The human rights- and environment-related expectations that the Nordex Group has towards its employees and suppliers,
- the Nordex Group's GSCA-related governance structure,
- the due diligence processes that Nordex SE establishes for the Nordex Group to identify and minimize risks and to end potential violations of human rights and the environment in its own business area and at suppliers, and
- the overview of the human rights and environmental risks and violations that have been identified as well as the related preventive and remedial measures we have taken.

We at the Nordex Group are fully committed to comply with the GSCA requirements and to support the protection of human rights and the environment – not only in our own operations, but also along our value chain.

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<sup>1</sup> Nordex SE, its subsidiaries within the scope of GSCA, and Nordex Energy SE & Co. KG are together referred to as "the Nordex Group" further on in this document.



## 1. SCOPE OF THE DOCUMENT

The Nordex Group is a group of companies which is globally active, and with several subsidiaries in Germany and abroad, focussing on the development, distribution and installation of wind energy turbines.

Within the Nordex Group, two entities are directly subject to GSCA:<sup>2</sup>

1. **Nordex SE**, as holding company acc. to sec. 1 (3) GSCA, including its subsidiaries, which are controlled by Nordex SE, and
2. **Nordex Energy SE & Co. KG**, having more than 1,000 employees acc. to sec. 1 (1) GSCA.

Based on board resolutions of Nordex SE and Nordex Energy SE & Co. KG from June 2023, Nordex SE implements the GSCA requirements for its subsidiaries, which are subject to GSCA, and for Nordex Energy SE & Co. KG.

The current document includes the Policy Statement of Nordex SE and its subsidiaries, and of Nordex Energy SE & Co. KG. It describes the fulfilment of their GSCA due diligence obligations, and the results of the risk analysis and related measures.

## 2. THE NORDEX GROUP'S EXPECTATIONS TOWARDS EMPLOYEES AND SUPPLIERS REGARDING THE PROTECTION OF HUMAN RIGHTS AND THE ENVIRONMENT

The Nordex Group is committed to respecting human rights and protecting the environment. It does not tolerate any violations of these principles in its own business area and – within its scope of influence – strives to ensure and achieve appropriate human rights conditions and environmental protection by its suppliers.

### 2.1 Expectations towards employees

The expectations to employees are defined in the [Nordex Group Code of Conduct for Employees](#). It reflects the Nordex Group's values and principles and serves as guidance for Nordex employees. All employees are made aware of these principles and are required to act accordingly. It is fully compatible with the requirements arising from the GSCA implementation and is applicable to all employees in the Nordex Group's own business area.

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<sup>2</sup> As of 31.05.2025.

## 2.2 Expectations towards suppliers

The Nordex Group expects its suppliers to commit to the principles in the [Code of Conduct for Contractors and Suppliers](#). It encourages its suppliers to develop and apply appropriate and effective processes and controls to detect, identify and prevent risks and violations of human rights and environmental obligations. The commitment to the Code of Conduct for Contractors and Suppliers is mandatory in supplier contracts since 2024. Long-term framework contracts get updated accordingly. The Nordex Group's General Terms & Conditions as well reference the document.

The recent published [Nordex Supplier Manual](#) provides a transparent and standardized framework for global supply chain collaboration. It ensures that suppliers without individual framework agreements or quality agreements receive essential guidance and general information. This establishes a common basis for collaboration between Nordex and its suppliers.

It applies globally and sets expectations for responsible sourcing, compliance, and continuous improvement.

## 3. THE NORDEX GROUP'S APPROACH TOWARDS IMPLEMENTING HUMAN RIGHTS AND ENVIRONMENTAL DUE DILIGENCE

The German Supply Chain Due Diligence Act requires companies to implement appropriate human rights- and environment-related due diligence obligations in their supply chains. Nordex SE and Nordex Energy SE & Co. KG have set-up a GSCA governance structure including the definitions of the relevant GSCA-related roles and responsibilities. Further, they have implemented processes to identify and manage human rights and environmental risks<sup>3</sup> in their own business areas and at suppliers worldwide.

The implementation of the GSCA requirements is based on the GSCA risk management system. It aims to continuously reduce risks related to human rights and the environment along the Nordex Group's supply chain and own operations. It includes the following key elements:

- Assignment of roles and responsibilities for implementation and execution of due diligence obligations, including the conduct and monitoring of the GSCA risk management,
- Execution of regular and ad-hoc risk analyses in the own business area and in the supply chain,
- Separation between the conduct of risk analysis, definition and implementation of measures and actions, all tasked to GSCA risk managers and GSCA Risk Owners,

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<sup>3</sup> See Annex.

and the monitoring and appropriateness checks by the Nordex Human Rights & Environment Officer,<sup>4</sup>

- Definition, implementation, and monitoring of preventive measures and remedial action responding to risks and violations identified in the own business area and at suppliers,
- A Nordex Group-wide complaints procedure, applying to all entities worldwide,
- Ongoing documentation of the due diligence obligations, and their integration into the integrated reporting of the Nordex Group, and
- A policy statement on the Nordex Group's human rights strategy (current document).

### **3.1 GSCA risk management system: Processes, roles, responsibilities**

The Nordex Group's GSCA risk management system for improving the human rights and environmental situation is built on an unambiguous assignment of roles and responsibilities for both operational implementation of due diligence and monitoring of GSCA risk management.

The monitoring of the GSCA risk management system is ensured by the HREO. The HREO oversees and monitors the effectiveness of the GSCA risk management system, conducts sample testing, and reports to the Management Boards of the Nordex Group at least once a year.

#### **Own business area**

To analyse, understand, and manage the risks in all entities within the Nordex Group's own business area,<sup>5</sup> the company has appointed competent staff members as GSCA risk managers and company-specific risk owners. The GSCA risk owners are knowledgeable about the specifics of the regions and the company- and site-specific situations and backgrounds. They are responsible for identifying and assessing risks in their respective areas of responsibility and, if necessary, they implement preventive measures and remedial actions.

The GSCA risk managers ensure the coordinated implementation of the risk management, they consolidate and ensure meaningful results of the risk analysis and support the definition and implementation of measures by the GSCA risk owners.

The GSCA risk managers are regular staff members of Nordex SE, the GSCA risk owners are staff members of the respective entities of the Nordex Group. All have been trained in the human rights and environmental positions that are covered by GSCA, and in the application of the GSCA risk assessment methodology.

#### **Supply chain**

To ensure the appropriate conduct of the analysis of the Nordex Group's supplier base and prioritized suppliers, GSCA risk managers in the Global Sourcing department steer

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<sup>4</sup> Further on: „HREO“.

<sup>5</sup> The term “own business area” describes the comprehensive set of legal entities of Nordex SE incl. its subsidiaries within the scope of GSCA, and Nordex Energy SE & Co. KG. See also 1. Scope of this document.

the supply chain risk analysis. They are operationally supported by the Sourcing Managers.

The GSCA risk managers as well as the Sourcing Managers have been trained in the human rights and environmental positions that are covered by GSCA, and in the application of the GSCA risk assessment methodology.

### **3.2 GSCA risk analysis approach**

The Nordex Group has defined a comprehensive methodology to analyze, assess, prioritize and address human rights- and environment-related risks in its supply chain and in its own business area. It addresses the BAFA-recommended approach, applies a variety of credible sources for understanding human rights and environmental risk, and is built on the due diligence methodology as laid out in the OECD Due Diligence Guidance for Responsible Business Conduct.<sup>6</sup>

The assessment and the prioritization of risks and violations enable the Nordex Group to get a comprehensive understanding of the companies' GSCA-risk situation, and to prioritize the risks. This enables the company to manage the risks, and to define, implement and monitor adequate mitigation measures.

#### **3.2.1 Risk analysis: Own business area**

For the Nordex Group's own business area, the GSCA-risks are identified by appointed GSCA risk managers and owners at each legal entity. They classify the risks according to their probability of occurrence and the severity of violation in four steps, from low risk up to high risk. They document the results together with related preventive measures and, in case of actual violations, of remedial actions.

#### **3.2.2 Risk analysis: Supply chain**

For Nordex SE and its subsidiaries, and for Nordex Energy SE & Co. KG, GSCA risk managers at the Nordex SE Global Sourcing department conduct a two-step risk analysis: Building on a list of all suppliers with whom the Nordex Group had direct contractual relationship ("tier-1 suppliers") within a reporting period of 12 months, they carry out an abstract and a concrete risk analysis:

##### **Step 1: Abstract risk analysis**

Suppliers with increased risk exposure ("high-risk suppliers") are identified by using internationally recognized country and industry indices. This clarifies whether the Nordex Group has tier-1 suppliers in countries or sectors with a high risk of violations of human rights or environmental positions within the scope of the GSCA.<sup>7</sup>

While considering these identification criteria, the risk analysis further prioritizes suppliers by taking into account the Nordex Group's causal contribution ("Verursachungsbeitrag") to the risks, mainly by considering the purchasing volume per supplier.

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<sup>6</sup> See [Due Diligence - Organisation for Economic Co-operation and Development \(oecd.org\)](https://www.oecd.org/due-diligence/) with links to documents.

<sup>7</sup> The abstract risk analysis applies the sources of the [BAFA risk database](#).





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Applying the country risk, sector risk and causal contribution by purchasing volume criteria, the abstract risk analysis results in the total of the high-risk tier-1 suppliers of Nordex SE, its subsidiaries, and of Nordex Energy SE & Co. KG.

### Step 2: Concrete risk analysis

The high-risk suppliers identified in the abstract risk analysis undergo a more specific analysis, to detect potential concrete GSCA-risks in their own operations or resulting from their activities. The Nordex SE Global Sourcing department collects the necessary information via questionnaires that it sends to the high-risk suppliers. The questionnaires are designed to collect information regarding the concrete human rights and environmental risk situation at the relevant sites. Only those parts of the questionnaire will be sent to a high-risk supplier which address the abstract risk situation, to avoid overburdening of the supplier. Based on the answers of the suppliers, the Nordex Group's GSCA risk managers analyse if concrete GSCA-related risks result from a supplier, taking into account the probability of occurrence and the severity of a potential violation. In case of identified concrete risks, relevant prevention measures will be defined.

#### 3.2.3 Ad-hoc risk analysis

The risk analysis processes described above are executed annually. In addition to those, risk analyses are carried out on an ad-hoc basis. An ad-hoc risk analysis is triggered by a substantial change in the Nordex Group's business activities or by actual evidence of a possible violation of a human rights or environmental obligation in the Nordex Group's own business area, or at tier-1 suppliers and their suppliers.

The starting point for a possible ad-hoc risk analysis is a report of the above topics to the HREO. The HREO reviews the report to understand whether the Nordex Group must expect a significantly changed risk situation in the supply chain, and/or in its own business activities. If no, this result is documented. In case a significant change is identified, the HREO calls the concerned risk managers for the Nordex Group's relevant company or supplier to initiate an ad-hoc risk analysis. They will apply a risk analysis for the relevant Nordex entity (see 3.2.1), respectively a concrete supplier risk analysis as described in 3.2.2.

### 3.3 Preventive measures

To minimize human rights related and environmental risks, the Nordex Group has established preventive measures in its own business area and vis-à-vis tier-1 suppliers.

#### Own business area

In its own business area, the Nordex Group has implemented the following preventive measures:

- **Human rights implementation approach:** It is defined by the provisions in the Human Rights Policy, the Code of Conduct for Contractors and Suppliers, the Code of Conduct for Employees, and further topic-specific policies such as the Nordex Group Forced Labor & Modern Slavery Policy. It is considering the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. The provisions are applied in the Nordex Group's value-adding and support processes, such as in supplier selection, and in the complaints procedure. It is manifested in the Nordex Group's values of responsible business conduct and value-based compliance and is



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implemented mainly by the processes laid out in the current document. Fostering the practical implementation of human rights and environmental protection positions plays a key role in the development of the new Sustainability Strategy of the Nordex Group, which will issued in early 2026, after the previous Sustainability Strategy came to its planned closing end of 2025.

- **Trainings:** The Nordex Group fosters respect for human rights and environmental protection within the company through regular target group-oriented trainings for its employees. By this, it supports that the employees have raised awareness to human rights and environmental protection and its underlying values. In addition, the Nordex Group provides dedicated trainings in the relevant departments to ensure that the GSCA-related risk managers and risk owners have the necessary know-how and background to conduct the GSCA-risk management tasks assigned to them.
- **Procurement strategies and practices:** The Nordex Group applies appropriate sourcing strategies and practices that consider human rights and environmental expectations, and that prevent or minimize potential risks in the Nordex Group's supply chain.
- **Risk-based control measures:** To comply with its human rights obligations, values, and implementation strategy, and to minimize related risks efficiently, the Nordex Group conducts risk-based control measures in its own business area.

### Supply Chain

When selecting suppliers, the Nordex Group considers human rights and environment-related expectations and applies appropriate procurement strategies and practices that prevent from or minimize GSCA risks. This includes:

- **Contractual assurance:** The Nordex Group contractually obliges its tier-1 suppliers to apply the human rights and environment-related expectations of the Nordex Group in their operations, including the protected positions as defined by the GSCA. Furthermore, the contractual clauses oblige the suppliers to address these expectations appropriately along their own supply chains.
- **Code of Conduct for Contractors and Suppliers:** It defines and communicates the expectations and values regarding human rights and environmental positions to all tier-1 suppliers. While the Nordex Group requires acceptance of this Code of Conduct in all suppliers' contracts since 2024, it is approaching suppliers with longer-term contracts, to sign the added GSCA amendments.<sup>8</sup>
- **Trainings:** The Nordex Group provides trainings and information to suppliers with identified high risks, to raise awareness of GSCA-related positions and risks. The trainings are provided as e-learnings and their completing is tracked.
- **Tier-2 suppliers:** The Nordex Group takes appropriate measures on a case-by-case basis if there are actual and substantiated indications of high risks or actual

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<sup>8</sup> All Suppliers with purchase volumes above a certain threshold are obliged to sign the Code of Conduct in course of a regular supplier due diligence process.

violations at a tier-2 supplier which came to the attention of the Nordex Group. The Nordex Group applies the principle of appropriate knowledge.

At least once a year, as well as on an ad-hoc basis, the Nordex Group HREO reviews the effectiveness of the implemented preventive measures.

### 3.4 Remedial action

If a violation of human rights or an environment-related position has already occurred or is imminent, the Nordex Group takes appropriate remedial measures without undue delay, both in its own business area and at tier-1 suppliers, to prevent or terminate the violation or to minimize the extent of the violation. The type and scope of remedial measures depend in each case on the specific violation.

At least once a year, as well as on an ad-hoc basis, the Nordex Group's HREO reviews the effectiveness of the implemented remedial actions.

### 3.5 Complaints procedure

The publicly accessible whistleblowing system of the Nordex Group "[notify!](#)" allows anyone to confidentially report risks or existing violations of human rights or environmental obligations in the supply chain or in the own business area. Every report made in good faith helps the Nordex Group to identify human rights and environmental risks in the supply chain and its own business area at an early stage, to prevent them from occurring, or to stop or mitigate violations that have already occurred. The Nordex Group encourages everyone to report observations of potential risks.

The reporting channel is available to anyone inside and outside of the Nordex Group, free of charge and accessible at any time to report actual or potential risks and violations, including those relevant for GSCA,<sup>9</sup> under <https://nordex.whistleblownetwork.net>. It applies the principles of non-disclosure, impartiality, independence and non-retaliation.

The GSCA-rules of procedure for the complaints procedure have been published in text form and are [publicly available on the Nordex Group's webpage](#). The rules of procedure serve as source of information for any potential whistleblower and provide transparency regarding the process and the protection of the whistleblower.

The Nordex Group reviews the effectiveness of the complaints procedure at least once a year and on an ad-hoc basis.

### 3.6 Documentation and Reporting

The Nordex Group HREO documents the compliance with the GSCA obligations continuously and informs the top management on a yearly and ad-hoc basis. The GSCA-related risks and activities are disclosed in the annual Sustainability Statements of the Nordex Group.

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<sup>9</sup> The complaints procedure is aligned with the requirements of the GSCA and applies the relevant BAFA guidance: Bundesamt für Wirtschaft und Ausfuhrkontrolle: „Beschwerdeverfahren organisieren, umsetzen und evaluieren; Handreichung Beschwerdeverfahren nach dem Lieferkettensorgfaltspflichtengesetz“; October 2022; (BAFA Guidelines Organizing, implementing and evaluating complaints mechanisms; Complaints mechanism according to the Supply Chain Due Diligence Act).

## 4. RISK ANALYSIS: RESULTS AND IMPLICATIONS

### 4.1 Nordex SE: Risk analysis of own business area

In course of 2025, Nordex SE analysed the risks of the GSCA-protected positions in its own business area, meaning at Nordex SE itself, and in its subsidiaries (see 2.1).

Following risk were assessed:

Risk	
Forced evictions and deprivation of natural resources (sec. 2 (2) no. 10)	
	Denial of property rights
	Non-compliance with local legislation, e.g. legal deadlines
	Deprivation of livelihood
Child labor (sec. 2 (2) no. 1)	
	Child labor under the age of 15
	Child labor during compulsory schooling
Worst forms of child labor (sec. 2 (2) no. 2)	
	Child slavery
	Sale and trafficking children
	Children in armed conflicts
	Child prostitution
	Children in pornography
	Children and drugs
Forced labor (sec. 2 (2) no. 3)	
	Withholding wages
	Withholding identification documents
	Other forms of involuntary work or service
	Unreasonable, hazardous working conditions
	Unreasonable accommodation
Slavery (sec. 2 (2) no. 4)	
	Restriction of freedom of movement
	Excessive amount of overtime
	Sexual exploitation
	Oppression through humiliation
Working conditions (sec. 2 (2) no. 5)	
	Hazards due to excessive overtime
Freedom of association (sec. 2 (2) no. 6)	
	Prohibition of forming trade unions
	Prohibition of joining trade unions
	Discrimination for joining or being a member of a trade union
	Retaliation for joining or being a member of a trade union
	Restriction or prohibition of the right to strike
	Restriction of the right to collective bargaining
Unequal treatment (sec. 2 (2) no. 7)	
	Unequal treatment
	Unequal wages
Withholding reasonable wage (sec. 2 (2) no. 8)	
Working safety (sec. 2 (2) no. 5)	
	Hazard due to radioactive substances
	Hazard due to explosive substances
	Hazard due to corrosive substances
	Hazard due to pathogens
	Hazard due to neurotoxins
	Hazard due to other poisons

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Contact with contaminated soils
Contact with contaminated water
Poisoning due to pesticides
Hazard due to electricity
High ambient temperature
Extreme heat
Hazard due to unsafe machines
Lack of provisions for emergency situations
Causing environmental changes (sec. 2 (2) no. 9)
Impairment of the production of food
No access to drinking water
No access to sanitation
Health damage due to environmental impacts
Mercury (sec. 2 (3) no. 1 - 3)
Mercury-added products
Use of mercury or mercury compounds in manufacturing processes
Storage of mercury
Disposal of mercury
Mercury emissions
Mercury release
Persistent organic pollutants (sec. 2 (3) no. 4 - 5)
POPs-Production
Use of POPs
Storage of POPs
Disposal of POPs
Hazardous waste (sec. 2 (3) no. 6 - 8)
Waste import
Waste export
Security forces (sec. 2 (2) no. 11)
Inappropriate treatment by private or public security forces
Impairment of freedom of association by private or public security forces

### Results of the risk analysis of own business area

Results of the risk analysis:

- 85 risks were assessed at 46 entities each,<sup>10</sup> whereas the risk analysis de-prioritized risks with a neglectable probability of occurrence at specific entities.
- No indications of actual violations of any of the GSCA protected positions above were detected. However, some medium risk in few countries occurred, related to overtime and working hours. This medium risk remains from previous year. To mitigate this risk, the Nordex Group continues to introduce recording systems at the affiliates where not available yet, and to roll out relevant company policies.
- Entry into new countries: The majority of Nordex SE's affiliates are registered in OECD member states. The fact of being member of the OECD reduces legal risk, as to become a member of the OECD, it is a prerequisite that the country-related legal system offers legal certainty to their citizens and individuals. For Nordex SE affiliates who are not registered in an OECD country, e.g., Argentina, Perú, China, India, Nordex SE and its affiliates implemented additional preventive measures.

<sup>10</sup> Including Nordex Energy SE & Co. KG, see 4.4.



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Before entering into any new country, Nordex SE and its affiliates reach out and retain local law firms who provide detailed information about the legal and judicial systems and market specific requirements. This information, and any further information that Nordex SE and its affiliates are aware of, undergoes an internal approval process and gets submitted to the management board.

### Preventive measures

Nordex SE and its affiliates conducted the GSCA risk analysis for the second time and included the identification and indication of the preventive measures from previous year.

The risk analysis considered the increased risks from previous year, and whether and how they were mitigated. Also, Nordex SE and its affiliates aim to understand whether long-term and structural issues were apparent and not mitigated.

Nordex SE and all affiliates were able to demonstrate process-inherent relevant mitigation measures, which are ongoing (see above).

### 4.2 Nordex SE: Risk analysis of the supply chain

In course of 2025, Nordex SE<sup>11</sup> analysed the risks of the GSCA-protected positions at its high-risk suppliers, and at the high-risk suppliers of Nordex SE's subsidiaries (see 3.1), applying the methodology described above.

#### Methodology of the supplier risk analysis

The Nordex Group considered 13.000 tier-1 suppliers in its abstract risk analysis. To identify the risk in the sense of potential severity and likelihood of a supplier to violate a GSCA protected position, selection criteria of country risk and industry risk (NACE codes) were applied. By this, 151 suppliers were identified as suppliers with an increased abstract risk. This selection was funneled by contract volume, to address the potential contribution of Nordex to the risk.

As a result, those suppliers were identified which have a potential high risk, and where the Nordex Group has a significant contribution to the risk. This group of suppliers became subject of the concrete risk analysis and received a questionnaire tailored to their abstract risk situations, to understand the individual risk disposition of each supplier.

The answers got checked for consistency and comprehensiveness by the GSCA Supplier Risk Manager and were double-checked on sample basis by the HREO.

Suppliers which entered into contractual relation in course of the reporting year will be considered in the risk analysis 2026, given the usual long-term contract durations, and the long lead times between contracting and start of operations/delivery.<sup>12</sup>

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<sup>11</sup> The risk analysis was conducted by Nordex SE Sourcing Excellence and Governance department, which is a global function for the Nordex Group. It conducts the supplier management for Nordex SE itself, its subsidiaries, and for Nordex Energy SE & Co. KG. The relevant entity being in contractual relationship with a specific supplier can be identified in the systems of the supplier management of the Nordex Group.

<sup>12</sup> For more details on due diligence at supplier selection stage see 3.3.

### **Results of the supplier risk analysis**

The results of the risk analysis, and the ways and measures how the company will address them, are:

No actual violations of one or more of the GSCA protected legal positions were identified. However, some suppliers indicated potential risks. This included security staff in companies which is potentially supervising employees, and a potential absence of instructions and procedures for dealing with violations of environmental regulations.

### **Preventive measures for suppliers**

Though none of the indicated concrete risks substantiated to actual violations, the Nordex Group provides topic-tailored and mandatory e-learning to the relevant suppliers.

In addition, the Nordex Group continues to call the suppliers having not done so before (see 3.3) to sign contract amendments addressing the GSCA protected legal positions, and the Code of Conduct for Subcontractors and Suppliers.

### **Remedial actions for suppliers**

As no indications of actual violations of any of the GSCA protected positions were identified, no remedial actions were taken.

The Nordex Group received four complaints via its complaints mechanism "*notify*", which indicated GSCA relevance. In all cases, the relevance of the complaint for GSCA could not be confirmed.

### **4.3 Nordex SE: Ad-hoc risk analysis**

In 2025, Nordex re-opened its production plant in Iowa, USA. Initial analysis and in-depths communication with the responsible persons at the Nordex Group and at entity level showed that this re-opening brings no significant change to the supply chain. This is because the produced turbine parts were introduced to the market by Nordex several years ago. Internally, a risk analysis of the site itself was conducted, resulting in no indications of increased GSCA related risks.

### **4.4 Nordex Energy SE & Co. KG: Risk analysis in own business area**

In course of 2025, Nordex Energy SE & Co. KG analysed the risks of the GSCA-protected positions in its own business area.

The Nordex Group operates globally as a matrix organisation with strong centralised corporate functions, global policies, and a high level of sharing of expertise, technology, and human and financial resources between companies within the group. By this, the GSCA risk analysis was conducted by global function departments of Nordex SE. These global function departments are also handling the operations of Nordex Energy SE & Co. KG. The results of the risk analysis, and the ways and measures how Nordex Energy SE & Co. KG addresses them, are therefore integrated in section 4.1.

No specific and/or increased risks were identified at Nordex Energy SE & Co. KG.





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### 4.5 Nordex Energy SE & Co. KG: Risk analysis of the supply chain

In course of 2025, Nordex Energy SE & Co. KG analysed the risks of the GSCA-protected positions at its high-risk suppliers, applying the methodology described above.

The management of the suppliers of Nordex Energy SE & Co. KG is integrated in the global supplier management of the Nordex Group, including the analysis and management of GSCA related risks and measures. For the underlying reasons see as described in no. 4.4. By this, the results of the Nordex Energy SE & Co. KG related GSCA supplier risk analysis are integrated into the GSCA risk analysis of Nordex SE (see 4.2).

### 4.6 Nordex Energy SE & Co. KG: Ad-hoc risk analysis

By issuing date of this document, no ad-hoc risk analysis had been triggered in the own business area or at suppliers of Nordex Energy SE & Co. KG.

## 5. CONTACT

For questions in relation to this policy statement, please contact the Nordex Group Human Rights and Environmental Officer via [humanrights@nordex-online.com](mailto:humanrights@nordex-online.com).

If you have any information about human rights or environmental risks or violations in the Nordex Group's own operations or its suppliers, please use our complaints mechanism "notify!": <https://nordex.whistleblownetwork.net/>.

The Policy Statement of Nordex SE and Nordex Energy SE & Co. KG pursuant to the German Supply Chain Due Diligence Act (GSCA) takes effect from 15 November 2025.

Hamburg, 30 November 2025

### Nordex SE Management Board

A blue ink signature of José Luis Blanco.

José Luis Blanco (CEO)

A blue ink signature of Dr Ilya Hartmann.

Dr Ilya Hartmann (CFO)

### Nordex Energy SE & Co. KG

represented by its sole general partner Nordex SE

A blue ink signature of José Luis Blanco.

José Luis Blanco (CEO)

A blue ink signature of Dr Ilya Hartmann.

Dr Ilya Hartmann (CFO)



## ANNEX: PROTECTED LEGAL POSITIONS IN THE GSCA

The GSCA "**protected legal positions**" ("Geschützte Rechtsgüter") are defined in sec. 2 GSCA and contain a comprehensive list of positions addressing human rights (para. 2) and the environment (para. 3). The protected legal positions are the risk categories which define the scope and extent of the GSCA-related risk analysis of Nordex SE and Nordex Energy SE & Co. KG.<sup>13</sup>

The GSCA lists twelve **human rights risk categories** which comprise labor and employment related topics, the protection of workers, the protection of livelihoods, and the protection against abuse by security forces. They address, among others but not exclusively, the employees of the Nordex Group and its suppliers as potentially affected parties.

<b>Protection of workers, sec. 2 (2) no. 1-8</b> <ol style="list-style-type: none"> <li>1. Prohibition of child labor below the minimum permissible age in accordance with the applicable law of the state of employment</li> <li>2. Prohibition of the worst forms of child labor</li> <li>3. Prohibition of the employment of persons in forced labor</li> <li>4. Prohibition of all forms of slavery</li> <li>5. Prohibition of the disregard of labor protection</li> <li>6. Prohibition of disregard for freedom of association</li> <li>7. Prohibition of unequal treatment in employment relationships</li> <li>8. Prohibition of the withholding of a reasonable wage</li> </ol>	<b>Protection of livelihoods, sec. 2 (2) no. 9-10</b> <ol style="list-style-type: none"> <li>9. Prohibition of contamination of air, water or soil, and prohibition of causing excessive consumption of water</li> <li>10. Prohibition of unlawful eviction and unlawful deprivation of land, forest and waters</li> </ol>
<b>Catch-all provision, sec. 2 (2) no. 12</b> <ol style="list-style-type: none"> <li>12. "The prohibition of an act or omission in breach of duty going beyond numbers 1 to 11, which is directly capable of impairing a protected legal position in a particularly serious manner and the unlawfulness of which is obvious on a reasonable assessment of all the circumstances under consideration."</li> </ol>	

The GSCA also lists three **environmental risk categories**, namely handling of mercury, persistent organic pollutants (POPs) and hazardous waste:

<b>Handling of mercury, sec. 2 (3) no. 1-3</b> <ol style="list-style-type: none"> <li>1. Prohibition of the manufacturing of mercury-added products</li> <li>2. Prohibition of the use of mercury and mercury compounds in manufacturing processes</li> <li>3. Prohibition of treatment of mercury waste</li> </ol>	<b>Handling of persistent organic pollutants, sec. 2 (3) no. 4-5</b> <ol style="list-style-type: none"> <li>4. Prohibition of the production and use of certain chemical pollutants</li> <li>5. Prohibition of non-environmentally sound handling, collection, storage and disposal of certain wastes</li> </ol>	<b>Handling of hazardous waste, sec. 2 (3) no. 6-8</b> <ol style="list-style-type: none"> <li>6. Prohibition of export of hazardous waste and other waste (according to the Basel Convention)</li> <li>7. Prohibition of export of hazardous waste depending on state of export and import</li> <li>8. Prohibition of import of hazardous waste and other waste</li> </ol>
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<sup>13</sup> A risk is a condition in which, on the basis of factual circumstances, a sufficient probability for a violation of one of the protected positions is imminent (sec. 2 (2) GSCA). A violation is a situation in which the risk has realized.