

# Modern Slavery Policy Statement

## 1. Introduction

- 1.1** Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain, Nordex has a zero- tolerance approach to modern slavery. We are committed to act ethically and with integrity in all our business dealings and relationships.
- 1.2** We are also committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other business partners and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect that our suppliers will hold their own suppliers to the same high standards.
- 1.3** This policy applies to all persons working for Nordex or on our behalf in any capacity, including all employees at all levels, directors, agency workers, seconded workers, volunteers, interns, contractors, external consultants, and third party representatives.

## 2. Responsibilities

- 2.1** Ultimate responsibility for the prevention of modern slavery rests with Nordex's leadership. The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations.
- 2.2** Line managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate training on it and the issue of modern slavery in supply chains.

## 3. Compliance with the policy

- 3.1** All employees must read, understand and comply with the policy.
- 3.2** The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us, or under our control
- 3.3** Employees must notify their manager as soon as possible, if they believe, suspect that a conflict with this policy has occurred, or may occur in the future.
- 3.4** Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chain at the earliest possible opportunity.
- 3.5** Should an employee believe or suspect a breach of this policy has occurred they must notify their manager or report it in accordance with the Nordex Confidential Reporting Policy as soon as possible.
- 3.6** Should an employee be unsure about whether a particular act, the treatment of workers more generally, or their working conditions within our supply chain constitutes any of the various forms of modern slavery, they should raise it with their manager or any member of the Management team.
- 3.7** Our aim is to encourage openness and Nordex will support anyone who raises a genuine concern under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicions of modern slavery. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe, you have suffered such treatment you should inform your manager or the P&C Manager immediately. If the matter is not resolved and you are an employee, you should raise it formally using the Grievance Procedure.



#### **4. Communication and awareness of this policy**

- 4.1 Training on this policy and on the risk our business faces from modern slavery in its supply chain will form part of the induction process for all new employees, contractors and temporary agency staff who work for us.
- 4.2 Our zero tolerance approach to modern slavery must be communicated to all suppliers and contractors at the outset and reinforced as appropriate.

#### **5. Breaches of this policy**

- 5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal.
- 5.2 Nordex may terminate the relationship with other individuals and organisations working on our behalf if they breach this policy.

#### **6. Review**

- 6.1 The Modern Slavery policy will be reviewed on a regular basis (at least annually) and may be amended from time to time.

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Jason Welch  
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