

HUMAN RIGHTS POLICY

OF SIEMENS GAMESA RENEWABLE ENERGY, S.A.

(Text approved by resolution of the Board of Directors dated September 12, 2018)

HUMAN RIGHTS POLICY

Pursuant to the provisions of section 529 *ter* of the Companies Act (*Ley de Sociedades de Capital*) and articles 33 of the By-Laws and 6, 7 and 38 of the Regulations of the Board of Directors, the Board of Directors of Siemens Gamesa Renewable Energy, S.A. (hereinafter “**Siemens Gamesa**” or the “**Company**” and the group of companies of which Siemens Gamesa is the controlling company, the “**Siemens Gamesa Group**”), hereby approves the **Human Rights Policy** of the Company, which is included within the Corporate Governance Rules. This policy supplements and further develops the Global Corporate Social Responsibility Policy of Siemens Gamesa and is based on the principles described below.

1. OBJECT

Aware of Siemens Gamesa’s responsibility to society as a whole, the Board of Directors commits to its activities being performed in accordance with a set of values, principles, standards and attitudes intended to achieve the sustained creation of value for shareholders, employees, customers and society as a whole, including strict respect for Human Rights.

It is thus the object of this Human Rights Policy to **formalise the Group’s commitment to absolute respect for the human and labour rights** recognised by domestic and international law and particularly the principles on which they are based: i) the UN Global Compact, ii) the Guiding Principles on Business and Human Rights, put into practice within the United Nations “Protect, Respect and Remedy” framework, iii) the OECD Guidelines for Multinational Enterprises, iv) the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, and v) the Social Policy of the International Labour Organization, as well as documents or texts that may replace or supplement those referred to above.

2. SCOPE

This policy applies to all companies making up the Siemens Gamesa Group, which must comply in good faith with the provisions (*section 3*) and the principles (*section 4*) described below. This Policy applies to all employees of the subsidiaries and affiliates of Siemens Gamesa worldwide.

Subcontractors working at the facilities of Siemens Gamesa must also comply with this Policy.

Likewise, Siemens Gamesa shall require the adoption of specific provisions on compliance with Human Rights and shall encourage the adoption of the main principles of conduct described among the subcontractors, partners and suppliers of the Siemens Gamesa Group.

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3. SPECIFIC PROVISIONS

3.1 Prohibition against forced labour

Siemens Gamesa is opposed to forced or compulsory labour. There shall be no allowance of, participation in or benefit from forced labour, including bonded labour, debt bondage, forced labour in penitentiary institutions, slavery or human trafficking. All employment is considered to be voluntary, and working persons are free to abandon their work at any time or terminate their contract.

3.2 Prohibition against child labour

Siemens Gamesa is opposed to the use of child labour. the Company will not allow or practice or support the use of child labour. The term “child” refers to any person: (a) less than 15 years of age (or 14 to the extent it is allowed by the law of the country concerned), (b) who is not of the age required to complete compulsory education, or (c) who does not have the minimum age to work in the country, whichever is higher.

3.3 Elimination of discrimination at workplace

Siemens Gamesa shall not allow, nor practice or support any type of discrimination based on race, colour, age, gender, nationality, sexual orientation, ethnic origin, disability, pregnancy, belief, political activism, union affiliation or marital status in contracts, remuneration or employment-related practices like promotions, bonuses, access to training, redundancy or retirement.

3.4 Respect for freedom of association and collective bargaining

Siemens Gamesa shall maintain strict neutrality with respect to the preferences of working persons and shall respect the rights thereof to freely associate, join or not join unions, seek representation, join work councils in accordance with local law and negotiate collectively with the company or its representatives. If rights to freedom of association or collective bargaining are restricted by law, appropriate channels shall be designed to ensure the reasonable and independent exercise thereof within the legal framework.

3.5 Elimination of harassment and violence

Siemens Gamesa shall not allow, nor practice or support acts of physical, verbal, sexual or psychological harassment, abuse or threats in the workplace. For this purpose, it shall define policies and disciplinary procedures that shall be communicated to all working persons and shall adopt measures to prevent and remedy such acts when appropriate.

3.6 Compliance with working conditions

Siemens Gamesa shall comply with the laws on working conditions, including the basic workday, overtime, rest breaks, leaves and vacations, among others, and shall adhere to the agreements negotiated with employee representatives.

3.7 Promotion of occupational health and safety

Siemens Gamesa is committed to working to achieve the goal of zero accidents and incidents and for general wellbeing in the workplace. It is supported by appropriate health and safety policies and procedures to comply with this principle.

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3.8 Protection of the environment

Siemens Gamesa is committed to comply with applicable legal requirements on the environment. The Company will carry out a constant improvement of the management systems and processes in order to maintain the right to a risk-free environment that is clean, healthy and sustainable, to prevent pollution, and to guarantee the minimisation of the environmental impact of its operations, products and services throughout the lifecycle thereof. It is supported by appropriate environmental policies and procedures to comply with this principle.

4. MAIN PRINCIPLES OF CONDUCT

4.1 All professionals of the Siemens Gamesa Group are required to strictly respect the Human Rights and labour rights recognised by domestic and international law in performing their activities, and to comply with international standards in those countries in which Human Rights law has not been sufficiently developed.

4.2 A culture of respect for Human Rights and awareness-raising among professionals in this area shall be promoted within all the companies of the Siemens Gamesa Group, and particularly those who operate in jurisdictions in which the risk of violating these rights might be higher.

4.3 Due diligence procedures shall be developed to identify the situations and activities with a higher risk of violating Human Rights, initiating mechanisms to prevent and mitigate such risk in the activities carried out by the companies of the Siemens Gamesa Group and in the activities of their suppliers.

4.4 There shall be reporting and claims mechanisms, with sufficient guarantees (accessible, fair, legitimate and transparent mechanisms) and with appropriate resolution procedures to deal with potential cases of violation of human rights that may be communicated by persons or organisations outside of the Siemens Gamesa Group.

4.5 Appropriate measures shall be adopted if a violation of Human Rights is detected at the facilities of Siemens Gamesa or at those of its suppliers as provided in the Code of Conduct or in the Code of Conduct for suppliers of Siemens Gamesa. It shall be reported to the competent public authorities to take appropriate action if such violation might constitute an administrative, civil, commercial, environmental or criminal offense.

4.6 There shall be regular monitoring of the application of the procedures to identify risky situations and activities and of the mechanisms to prevent and mitigate Human Rights risks, with monitoring indicators, especially focusing the analysis on the main centres of activity at which there may be a risk of violation of these rights.

4.7 Siemens Gamesa demands that its subcontractors, partners and suppliers comply, at a minimum, with the specific underlined provisions of this human rights Policy of Siemens Gamesa. These mandatory conditions shall be established through a supplier Code of Conduct provided for this purpose.

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5. IMPLEMENTATION AND UPDATE

This Policy constitutes the framework within which Siemens Gamesa articulates rules and procedures, as necessary, in the area of Human Rights. The application of this Human Rights Policy is consolidated with model, policies, regulations and appropriate operating procedures in the management areas of Human Resources, Procurement and Supplies, Quality, Health, Safety and Environment, Risk Control, Ethics and Compliance, and is aligned with the social responsibility policies of the Siemens Gamesa Group as well as with the Siemens Gamesa Code of Conduct. Likewise, it will be progressively updated as the due diligence procedures and processes gradually include new aspects relating to Human Rights.

The Executive Committee and the heads of each of the regions and units identified in the Organisational Chart of the Siemens Gamesa Group shall adopt the measures necessary for the dissemination of this policy within the Siemens Gamesa Group and compliance herewith, assigning the means necessary (human, technological and financial, as well as training and a culture of respect for human rights).

6. REVIEW AND SUPERVISION

The Company's Board of Directors has the duty of coordinating the policies, strategies and guidelines of the Siemens Gamesa Group, acting for the common benefit and interest thereof and of Siemens Gamesa.

The Audit, Compliance and Related Party Transactions Committee is responsible for knowing, promoting, guiding and supervising the conduct of the Company in the area of corporate social responsibility and in particular with respect to this Policy. Siemens Gamesa may also rely on independent entities to supervise compliance with this Policy.

The Company shall public report on activities related to compliance with this Human Rights Policy with the frequency it deems appropriate through the relevant Sustainability or Corporate Social Responsibility Report.

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