



Booklet for Code of Conduct for Suppliers and Third Party Intermediaries

Introduction

The Siemens Gamesa Code of Conduct for Suppliers and Third Party Intermediaries (also commonly referred to as “the Code”) applies to suppliers and third party intermediaries e.g. contractors and other Siemens Gamesa partners. Hereafter, the term “supplier” covers all suppliers and intermediaries. This Code is based on – among others – the UN Global Compact and the principles of the International Labor Organization, the principles of the Rio Declaration on Environment and Development, the EICC Code of Conduct and ISO standards. It also reflects the Siemens Gamesa [Supplier Relationship Policy](#), our internal Code of Conduct and Guidelines, which reinforces the fundamental principles of sustainability and applies companywide.

The Code establishes standards to ensure that working conditions in the company supply chain are safe, that workers are treated with respect and dignity, and that business operations with suppliers are ethical, social and environmentally responsible. The Code remains independent and updated on a regular basis to reflect the standards of Siemens Gamesa in its operations with suppliers.

On the following pages you will find information about our approach to sustainability in the supply chain, a set of commonly accepted rules and regulations, as well as practical information for fulfilling sustainable business practices. Topics highlighted in Bold Dark Purple are already part of the Code.

Siemens Gamesa promotes the Code to all suppliers and will request compliance and adherence to it from all our suppliers and third party intermediaries. The Code is incorporated into the General Purchasing Conditions and also in framework contracts and purchase agreements with each supplier.

Suppliers of legacy Siemens Wind Power that have already signed the Siemens AG Code of Conduct for Suppliers (version 3.0), or have a valid contract with a Corporate Responsibility clause, as well as suppliers of legacy Gamesa that have signed the Gamesa Code of Conduct for Suppliers (2015 version), the General Purchasing Conditions or a contract or purchase agreement in that edition that already incorporates the contents of the code will be considered to have effectively adhered to this Code. Suppliers may also declare their adherence to the Code by signing the document published on Siemens Gamesa’s website. In case of refusal and/or non-adherence to the Code, the supplier will be identified and Siemens Gamesa will take the measures deemed necessary.

Index

4	1. Sustainability in the Supply Chain
4	2. Evaluation, Detection & Consequences
5	2.1. Detection modules
5	2.1.1. Audits and inspections
5	2.1.2. Sustainability Self Assessments
5	2.1.3. Supplier Evaluation
5	2.1.4. External Sustainability Audits and Incident Driven Inspections
5	2.2. Consequences of deviations
6	3. Human rights
6	3.1. Non-Discrimination
6	3.2. Respect for Cultures & Communities
7	4. Fair Operating practices
7	4.1. Legal compliance
7	4.2. Anti-corruption and bribery
8	4.3. Fair Treatment and Supply Chain
8	5. Labor Practices
9	5.1. Prohibition of Forced Labor and Child Labor
9	5.2. Occupational Health & Safety
9	5.2.1. Compliance Assurance
9	5.2.2. Management Systems for Occupational Health and Safety
10	5.2.3. Operational Excellence and Product Stewardship
10	5.2.4. Compliance in the Transport of Dangerous Goods
10	5.3. Basic Human Rights, Working Hours, Wages & Benefits of employees
11	6. Environmental Protection
11	6.1. Compliance Assurance
11	6.2. Environmental Management Systems
12	6.3. Operational Excellence and Product Stewardship
12	6.4. Substance Management
12	6.5. REACH compliance
12	6.6. RoHS Compliance
12	6.7. Battery Directive compliance
13	7. Conflict Minerals
14	8. Third party intermediaries – Business Partners
14	9. Reporting Channels
15	10. Appendix A

1. Sustainability in the Supply Chain

The [Siemens Gamesa Global Corporate Social Responsibility Policy](#) establishes the commitment of the Board of Directors in ensuring that activities are conducted in accordance with a set of values, principles, standards and attitudes designed to achieve the sustained creation of value for shareholders, employees, customers and for society at large.

As stated by the UN Global Compact, supply chain sustainability and responsible procurement are critical to making global goals like the sustainable development goals (SDGs) impact local business. There is a relationship of reciprocity between the SDGs and a sustainable supply chain – where the SDGs serve as a framework for achieving responsible procurement and sustainable operations across an industry’s value chain help to achieve a number of the SDGs e.g. UN SDG #8: Decent Work and Economic Growth, UN SDG #10: Reduced Inequalities, UN SDG #12: Responsible Production and Consumption, UN SDG #17: Partnerships for the Goals, amongst others.

Since our suppliers play a critical role in our sustainability-oriented value chain, Siemens Gamesa expects them to also demonstrate their commitment towards these standards and principles which are summarized in the Code.

Our sustainability performance is being monitored continuously and has been externally confirmed by the most renowned and relevant sustainability indexes and ratings. Our participation in various ratings and indices is always available in our [website](#).

2. Evaluation, Detection & Consequences

An integrated supplier management process creates the conditions for the common optimization of this value chain. It ensures our global competitiveness and our adherence with our broad sustainability requirements. Therefore, our sustainability requirements are embedded company-wide in unified, mandatory procurement processes and a key part of this is ensuring that our suppliers agree contractually to abide by the Code. We developed a system of contractual obligations to ensure that all of our suppliers commit to the requirements of the Code:

- **Qualifying suppliers:** within our Supplier Qualification process, all suppliers must pass several preliminary requirements – one being the commitment to our Code.
- **Negotiating contracts:** all new and extended procurement contracts have to include the Corporate Responsibility contract clause which commits the supplier to our Code and, additionally, defines self-assessment and audit rights.
- **Purchase orders:** to complete the system and to cover possible small procurement volumes which might not be covered by explicit procurement contracts, all purchase orders include the Code commitment in the General Purchasing Conditions.

Siemens Gamesa implements a risk-based due diligence process to assess compliance with our Code, identifying any areas of non-compliance of our code, and highlighting opportunities to promote improved performance. This includes systematic

screening of new and existing suppliers through background checks and risk assessments associated with the sector and countries of operation. If relevant, suppliers are selected to go through one or more detection modules.

2.1. Detection modules

This chapter only applies to suppliers which are involved in the Siemens Gamesa procurement process. Sustained compliance with the responsibilities and principles of the Code is checked by Siemens Gamesa using the methods described below. In no case does this process exempt the supplier from its own responsibilities in relation to the fulfillment of the Code.

2.1.1. Audits and inspections

During regular process and system audits at the supplier's premises the sustained implementation of the requirements of the Code is also checked. Audits and inspections at the supplier's premises are only carried out following prior notification by Siemens Gamesa, within normal operating hours and in accordance with the applicable laws. In addition, it will be ensured that the business activities of the supplier are not disrupted and that confidentiality agreements with third parties are not breached. Protection of personal data is important to Siemens Gamesa, therefore all personal information is handled in line with the applicable legal guidelines on the protection of personal information, data security and anti-trust regulations. This means that data associated with personnel or price calculations, for example, are not included in an audit.

2.1.2. Sustainability Self Assessments

The Sustainability Self-Assessment is an integral part of the Siemens Gamesa Supplier Qualification Process. Siemens Gamesa expects, on the basis of a questionnaire, that the supplier provides its own assessment of the requirements of the Code. The questionnaire may be available in Siemens Gamesa's own platform or applied by a third party on behalf of Siemens Gamesa.

2.1.3. Supplier Evaluation

To ensure that suppliers continuously comply with our performance requirements in the course of the supplier relationship, performance of existing Siemens Gamesa suppliers is evaluated regularly on the basis of standardized

criteria as stipulated by ISO standards.

The supplier evaluation is performed at least once a year and has our most relevant and critical suppliers in scope. The evaluation is carried out by collaborative cross functional teams and results in a standardized classification which ranges from "Excellent" to "Insufficient".

2.1.4. External Sustainability Audits and Incident Driven Inspections

Siemens Gamesa has appointed internationally recognized auditing companies to conduct on-site audits based on the universally valid principles of the Code. The outcome is an in-depth assessment and report that enables Siemens Gamesa and its suppliers to identify and manage potential sustainability risks. External Sustainability Audits also play an important role in the supplier development scheme by improving the supplier's sustainability performance.

Incident Driven Inspections are carried out when a strong suspicion of a non-conformance with the Code exists – for example, on the basis of well-known media reports or results from regular quality audits. Incident Driven Inspections are carried out with prior notification. The scope of an Incident Driven Inspection focuses on a section of the Code to ensure a detailed assessment of the suspected non-conformance. Incident Driven Inspections are carried out by a third party auditor authorized by Siemens Gamesa.

2.2. Consequences of deviations

If areas of non-conformance are identified, the supplier and Siemens Gamesa will collaborate and agree on an action plan consisting of appropriate improvement measures. These shall mitigate and eliminate the adverse impacts caused by the breaches and enable the supplier to identify and prevent similar occurrences in the future. We require our suppliers to engage actively and without reservation in these activities.

The time frame for rectification can, depending on the type and extent of the deviation, cover an agreed period of weeks or months during which time the required remedial measures are defined and put in place by the supplier immediately following discovery of the non-conformance. All measures put in place after inspections are incorporated into the company-wide

supplier management process at Siemens Gamesa and are systematically selected and pursued. Implementation of the measures has, therefore, an influence on the supplier's annual performance rating and on the assessment of the supplier's future potential, as well as on the approval of the supplier within the regular supplier qualification process.

We are aware that improving ethical, social and environmental performance requires time and resources. However, Siemens Gamesa reserves the right to pursue a termination of the business relationship if a supplier, by intention or repeated negligence, fails to live up to this Code in a manner that is explicit and severe, or if the supplier demonstrates a continual refusal to engage in due diligence activities or lack of commitment to making progress on issues identified during an audit or inspection.

3. Human rights

Siemens Gamesa respects the protection of internationally proclaimed human rights and avoids complicity with human rights Abuses, and our commitment is addressed in the [Siemens Gamesa Human Rights Policy](#). The same is expected from all suppliers engaging in business with Siemens Gamesa.

3.1. Non-Discrimination

Our organization commits to equal opportunities, respect for diversity and zero-tolerance stance on discrimination, as reflected in the [Siemens Gamesa Diversity and Inclusion Policy](#). Siemens Gamesa's employment model is based on respect for and compliance with universal standards in both the human rights and labor legislation arenas. Our labor policies and practices are underpinned by endorsement of the most stringent international labor standards (including the WLO and United Nations conventions) and materialize in the promotion of employee rights, going beyond local requirements in this respect.

Suppliers are expected to:

- **Refuse to tolerate any unacceptable treatment of individuals such as mental cruelty, sexual harassment or discrimination including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.**
- **Promote equal opportunities and treatment of employees, irrespective of skin color, race, nationality, ethnicity, political affiliation, social background, disabilities, sexual orientation, marital status, religious conviction, gender or age.**
- Promote these principles and ensure related training for all employees.
- Abide by the principles of equal opportunities and equal treatment when hiring employees and in other personnel-related activities such as training and continuing professional development and advancement, and implement

internal regulations created for this purpose. For example, discrimination, including on the basis of race or skin color, is not permitted within supplier's company.

- When using security personnel, including contracted security personnel, ensure the respect for human rights and dignity of all people and in case of threat, use reasonable force proportional to the threat.

3.2. Respect for Cultures & Communities

Siemens Gamesa is deeply anchored in the societies in which it operates and aims to positively contribute to their sustainable development. Commitment to a more prosperous society is not only compatible, but inter-dependent with enduring business success.

One of our goals is to contribute, through our business activities, to the generation of wealth and well-being in the communities we operate in. To this end, the company takes a holistic and active approach towards business responsibilities in these regions directly, in its capacity as employer, customer and supplier, and indirectly, by paying taxes and seeking representation via associations.

As a driver of industrial activities, Siemens Gamesa's operations have a clear-cut economic impact on the operating markets via the investments we make and the attractive jobs we create. In addition to generating and distributing economic value in this manner, our community influence extends beyond the impact of business operations, representing more of a long-term commitment.

Suppliers are expected to:

- **Help foster economic and social development of local communities and ensure full respect for the human rights, dignity, aspirations, culture, and natural resource-based livelihoods in areas in which operations are made.**

- Respect for the environment by complying with prevailing legislation and collaborating in the environment's conservation and improvement.
- Relationships with public authorities should be guided by institutional respect and compliance with the law.

4. Fair Operating practices

4.1. Legal compliance

Siemens Gamesa conducts business responsibly and in compliance with the legal requirements and governmental regulations of the countries in which we operate. Therefore, the company will under no circumstances tolerate illegal or non-compliant behavior.

We have set ourselves globally-binding principles and guidelines that require all employees and managers to behave in an ethical, law-abiding manner. Equally, Siemens Gamesa expects its suppliers to comply with all applicable laws and regulations, in particular in the field of anti-corruption and antitrust.

Suppliers are expected to:

- **Comply with the laws of the applicable legal systems they operate in.**
- Impose a contractual obligation on your suppliers to comply with the law, in particular the provisions governing corruption, and monitor adherence to it.

4.2. Anti-corruption and bribery

Siemens Gamesa and its suppliers commit to maintain zero tolerance for any form of corruption, extortion or bribery. Furthermore Siemens Gamesa prohibits its suppliers from directly or indirectly offering, promising, granting anything of value to government officials or to a counterpart in the private sector with intentions to influence official action or obtain an improper advantage.

The term government official covers officials or employees of any government or other public body, agency or legal

entity at any level, including officers or employees of state-owned enterprises, political parties and public international organizations.

Any offer, promise, grant or gift made by a supplier in connection with Siemens Gamesa business must comply with applicable laws and must not create an appearance of bad faith or impropriety.

Another important topic is fair competition, which is in many countries protected by antitrust laws. Antitrust laws prohibit agreements between companies that restrict competition, e.g. price fixing, market or customer allocation, market sharing or bid rigging with competitors, or the abuse of a dominant position in the market.

Siemens Gamesa has strict rules to act in compliance with antitrust laws and expects its contractual partners to do the same.

Suppliers are expected to:

- **Act in accordance with national and international competition laws and e.g. not to participate in price fixing, market or customer allocation, market sharing or bid rigging with competitors.**
- **Tolerate no form of and not to engage directly or indirectly in any form of corruption or bribery and not to grant, offer or promise anything of value to a government official or to a counterpart in the private sector to influence official action or obtain an improper advantage.**
- Set up, implement and maintain a company-wide appropriate compliance program or process which takes into consideration the company's size and risks.
- Define binding rules for all employees, including rules

governing the offering and acceptance of gifts.

- Provide all employees with regular training in respect of important compliance issues.
- Appropriately respond to compliance violations.
- Emphasize the responsibility of the executive management for compliance matters.

4.3. Fair Treatment and Supply Chain

Siemens Gamesa has a strict policy to avoid all conflicts of interest that may adversely influence business relationships. This includes non-infringement of the intellectual property rights of others (e.g. copyrights, patents, trademarks and trade secrets) and acting within the limits of licenses granted (e.g. with respect to software).

Conflicts of interest arise when we engage in activities or advance personal interests at the expense of company's interest and in connection with the execution of company's professional duties.

It is not permitted to use, for own personal contracts or orders, companies with which we have business dealings as part of activities for Siemens Gamesa if they could derive any advantage from the personal contract or order. This is particularly applicable if employees exercise or are capable

of exercising a direct or indirect influence upon whether that company receives a contract from Siemens Gamesa.

We not only expect our suppliers to comply with our Code, but also endorse and advocate it among their own suppliers. Suppliers are expected to:

- **Notify and promote using reasonable efforts among its suppliers compliance with this Code of Conduct.**
- Monitor its suppliers' adherence to the principles in this Code and establish this as a fundamental step in supplier selection.
- **Comply with the principles of non-discrimination with regard to supplier selection and treatment.**
- Establish measures which prevent conflict of interests.
- Take care that no family or other personal relationship is used to improperly influence your employees' business judgment.
- Assure employees do not use their position to offer gifts, invitations or other advantages to Siemens Gamesa employees. This does not apply to occasional gifts of purely symbolic value or meals or entertainment of appropriate value that are consistent with local customs and practices, Siemens Gamesa policies and with applicable law. Any other gifts, meals or entertainment must be refused.

5. Labor Practices

Siemens Gamesa expects its suppliers to respect the fundamental employment rights set out in international conventions of the United Nations (UN), the International Labor Organization (ILO), the Organization for Economic Cooperation and Development (OECD) and the UN Global Compact initiative. Further information on international conventions on fundamental employment rights:

<http://www.siemensgamesa.com/en/sustainability/>

<http://www.un.org/en/universal-declaration-human-rights/>

<http://www.ilo.org/declaration/thedeclaration/textdeclaration/lang--en/index.htm>

<https://www.unglobalcompact.org/what-is-gc/mission/principles>

5.1. Prohibition of Forced Labor and Child Labor

Our company and all of its contractual partners are obligated to avoid all forms of forced and compulsory labor and refuse to employ or make anyone work against their will.

We also expect our suppliers to only employ workers with a minimum age of 15. This minimum employment age is laid down in several conventions of the International Labor Organization (ILO). These conventions regulate internationally valid lower limits. If a higher minimum employment age is valid in the country in which a supplier maintains its business premises, then the supplier must adhere to it. In exceptional cases only, we will accept a minimum age of 14 provided that a statutory minimum age of 14 applies under ILO Convention 138 in the country where the affected supplier maintains its business establishment.

Furthermore Siemens Gamesa requires its suppliers to also monitor their suppliers to ensure that they comply with regulations governing the prohibition of child labor.

Suppliers are expected to:

- **Avoid all forms of forced and compulsory labor and refuse to employ or make anyone work against their will.**
- **Employ no workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, employ no workers under the age of 14.**
- Have internal regulations governing respect for applicable employment rights.
- Verify the dates of birth when appointing new employees and document them in the personnel files.
- Do not employ anyone who, because of an act of law, an official decision or a court ruling, is obligated to work for you. For example, forced labor as defined in Convention No. 29 of the International Labor Organization (ILO) is not permitted within supplier's company.
- Establish internal rules for the fair treatment of others and monitor their observance.
- Allow employees to freely lodge complaints with their superiors without fear of reprisal.

5.2. Occupational Health & Safety

Siemens Gamesa pursues the highest degree of safety and wellbeing for its employees, suppliers, contractors and other business partners. We conduct our activities in a safe manner while providing healthy work environments and safe products around the world. We continuously strive to establish improvement measures related to health and safety for our activities, products and services that incorporate the entire product lifecycle, from product development through manufacturing and use, to re-use, recycling or disposal.

We have established an integrated management system to support safe operations and working conditions. Together with our [Siemens Gamesa Policy](#), we develop long term strategic thinking and clear objectives for ensuring that the risk of harm to people from our activities (e.g. our employees, contractors, visitors, etc.) is minimized.

5.2.1. Compliance Assurance

Siemens Gamesa is committed to doing business with responsible suppliers who also prioritize health and safety. Responsible means acting in accordance with any applicable statutory and international standards regarding health and safety as well as adopting a holistic approach to minimizing adverse hazards in relation to a company's activities, products and services.

5.2.2. Management Systems for Occupational Health and Safety

We expect our suppliers to take appropriate preventive measures and systematic efforts to minimize risks and hazards associated to their activities, products or services as much as possible through a "reasonable management system". We also expect suppliers to plan accordingly to prevent undesired incidents, employ control measures to eliminate their (re)occurrence and continuously improve their OH&S (Occupational Health & Safety) performance. Planning accordingly can denote using appropriate procedures, methods and tools to assess risks and hazards, describing work processes, training and building capacities around relevant OH&S topics, establishing performance improvement targets and regular monitoring and communicating around these.

A supplier's relevance and scope of responsibility for health and safety depends on the type of activities it performs, products or services it delivers and the industry in which it operates in. For this please refer to Appendix A which describes reasonable management systems and differentiates between three supplier categories.

5.2.3. Operational Excellence and Product Stewardship

We expect our suppliers to adopt a holistic approach to minimizing adverse risks to OH&S in relation to a company's activities, products and services. As our partners they should adopt a similar approach for operational eco-efficiency and product stewardship, and they are encouraged to join our efforts in minimizing the hazards and the likelihood of incidents associated with the substances, materials, components and services they supply us with.

5.2.4. Compliance in the Transport of Dangerous Goods

Siemens Gamesa strives to comply with the dangerous goods regulations worldwide with a network of properly trained employees throughout the complete transport chain covering the classification of our products and equipment, packing, shipping, use of service providers, etc. As a global player, we also strive to serve our customers in a safe manner without delay or objection.

Suppliers of dangerous goods to Siemens Gamesa have to meet all the applicable dangerous goods requirements of the selected transport modes and the relevant national variations.

Suppliers have the responsibility for:

- The different subjects - classification, allowed inner or outer packaging, mass and contents limits, marking, labelling, accompanying documents, etc. which are regulated by the international and national dangerous goods regulations.
- Making properly trained employees available in adequate numbers in the companies involved in dangerous goods transport in order to ensure that all relevant activities can be performed in compliance with the regulations.

Suppliers are obligated to forward data sheets to Siemens Gamesa with the relevant dangerous goods information. Here are some examples of dangerous goods:

- Chemical products
- Lithium cell or batteries also packed with or contained in equipment e.g. circuit board, tools, defibrillators, equipment, etc.
- Non-spillable or wet batteries e.g. contained in an UPS (uninterruptible power supply), aviation lights, etc.
- Pressurized articles e.g. piston accumulators, fire extinguishers, hydraulic stations, etc.
- Magnetized materials e.g. tools, etc.
- Radioactive materials e.g. ionized smoke detectors, etc.

Suppliers are expected to:

- **Act in accordance with the applicable statutory and international standards regarding occupational health and safety as well as product related health and safety.**
- **Establish a reasonable management system for occupational health & safety.**
- Have a clear commitment by management for occupational health and safety.
- Provide safe working conditions and take precautionary measures against hazards e.g. occupational accidents and illnesses.
- Provide training to ensure employees are educated in health & safety issues and have the right to refuse unsafe work.
- Contribute to the pillars within Siemens Gamesa Policy and collaborate for innovations and improvements for occupational health and safety across your value chain.

5.3. Basic Human Rights, Working Hours, Wages & Benefits of employees

As participant in the UN Global Compact, Siemens Gamesa is committed to respecting all human rights described in the Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.

1 A supplier's relevance and scope of responsibility for occupational health and safety depends on the type of activities it performs, products or services it delivers and the industry in which it operates in. Refer to Appendix A which describes reasonable management systems and differentiates between three supplier categories.

Our pledge is to safeguard and strengthen human rights across our global operations and supply chains. We expect our suppliers to treat employees fairly, with dignity and respect, and provide a workplace free from discrimination.

Our employees, customers, and business partners have every right to trust that their personal data is handled with respect and processed in accordance with applicable laws.

Suppliers are expected to:

- **Respect the personal dignity, privacy and rights of each individual.**
- **Comply with the maximum number of working hours including minimum breaks, holidays and leaves, laid down in the applicable laws.**
- **Provide fair remuneration and guarantee the applicable national statutory minimum wage.**
- **Recognize, as far as legally possible, the right of free**

association and collective bargaining. Neither favor nor discriminate against members of employee organizations or trade unions.

- Have internal regulations governing respect for applicable employment rights.
- Establish internal rules for the fair treatment of others and monitor their observance.
- Prohibit the use of corporal punishment and any form of coercion, abuse or harassment.
- Only perform disciplinary actions that have been duly communicated to all employees and any disciplinary action shall be recorded and acknowledged by the affected employee in writing.
- Prohibit the use of monetary fines.
- Allow employees to lodge complaints with their superiors without fear of reprisal.

6. Environmental Protection

Siemens Gamesa pursues environmental protection in all regions of the world where we are active. We continuously strive to establish environmental improvement measures for our activities, products and services that incorporate the entire product life cycle, from product development through manufacturing and use, to re-use, recycling or disposal.

We have established an integrated management system to support environmentally friendly and sustainable operations.

Together with our [Siemens Gamesa Policy](#) and [Climate Policy](#), we develop long term strategic thinking and clear objectives for the environment which guide us towards continual improvement.

6.1. Compliance Assurance

Siemens Gamesa is committed to doing business with environmentally responsible suppliers. We expect our suppliers, as a minimum, to act in accordance with all applicable statutory and international standards regarding environmental protection in relation to both operations and products or services, including substance management.

6.2. Environmental Management Systems

We expect our suppliers to take appropriate preventive measures and systematic efforts to protect the environment and to minimize the environmental impacts of their activities, products or services as much as possible through a “reasonable management system”. We also expect suppliers to plan accordingly (through the use of appropriate procedures, methods and tools) to prevent undesired environmental impacts and incidents, employ control measures to eliminate their (re)occurrence and continuously improve their environmental performance.

A supplier's relevance and scope of responsibility for environmental protection depends on the type of activities it performs, products or services it delivers and the industry in which it operates in. For this please refer to Appendix A which describes reasonable management systems and differentiates between three supplier categories.

6.3. Operational Excellence and Product Stewardship

We expect our suppliers to adopt a holistic approach to minimizing adverse environmental impacts in relation to a company's activities, products and services. As our partners they should adopt a similar approach for operational eco-efficiency and product stewardship and they are encouraged to join our efforts in minimizing the environmental impacts associated with the substances, materials, components and services they supply us with.

6.4. Substance Management

We expect our suppliers to ensure substance and material declarations according to product related environmental laws, e.g. REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals), RoHS (Restriction of Hazardous Substances), ODS (Ozone Depleting Substances), WEEE (Waste of Electrical Electronic Equipment), Battery Directive, etc. We also expect our suppliers to conform with Siemens Gamesa's global procedures related to substance management as well as [BOMCheck's List of Restricted and Declarable Substances](#).

6.5. REACH compliance

The European Regulation No. 1907/2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemical (REACH) entered into force in June 2007. The legal requirements in REACH are applicable for chemical products and articles (sub-articles in complex articles).

Suppliers are expected to:

- Comply with all the applicable REACH requirements for the product (article / chemical).
- Inform Siemens Gamesa of candidate substances in the article exceeding the 0,1 w/w % before delivery and

forward when the REACH candidate list is updated every June and December. (Siemens Gamesa is obligated to forward information of the REACH candidate substances to customers).

- Replace substances to phase out candidate substances.

Suppliers located outside the EU importing products (chemical and articles) to Siemens Gamesa within the EU shall nominate an EU "only representative" to undertake any applicable REACH importer obligations. Evidence of substance registration at ECHA must be submitted to Siemens Gamesa before import of chemical products is accepted.

For further information, please access the [REACH candidate list](#).

6.6. RoHS compliance

The "Restrictions of Hazardous Substances (RoHS)" European Directive 2002/95/EC was enacted by the European community to minimize the environmental impact of End-of-Life electrical and electronic equipment. The Directive bans the use of lead, cadmium, mercury, hexavalent chromium as well as the flame retardants polybrominated biphenyls (PBBs) and polybrominated diphenylethers (PBDEs).

Suppliers are required to inform of EEE (electrical and electronic equipment) in the scope of the WEEE directive. Information suppliers shall submit include the WEEE 2018 category, weight and number of EEE equipment.

For further information, please access: http://ec.europa.eu/environment/waste/wEEE/index_en.htm

6.7. Battery Directive compliance

Suppliers of batteries, as well as suppliers of equipment containing batteries, are obligated to comply with the requirements of the battery directive, when importing to Siemens Gamesa in European Union. Suppliers shall submit the following information for authority reporting of batteries: battery type (battery category), weight and number of batteries per material number.

Suppliers are expected to:

- **Act in accordance with the applicable statutory and international standards regarding environmental protection in relation to both operations and products or services, including substance management.**

- **Establish a reasonable¹ management system for environmental protection.**
- Have a clear commitment by management for environmental protection.
- Provide training to ensure employees are educated in environmental issues and your company's internal processes and international standards.
- Continuously act to minimize environmental impacts and take precautionary measures against resource use, pollution and loss in biodiversity or natural habitats.
- Contribute to the pillars within [Siemens Gamesa Policy](#) and collaborate for innovations and improvements for environmental protection across your value chain.

7. Conflict Minerals

Until the present day, trade in Conflict Minerals has been affected by many violent struggles in conflict-affected and high-risk areas. The local population is facing systematic exploitation in the fight between armed groups for control of the mines and trading routes.

OECD defines conflict-affected and high-risk areas are identified by the presence of armed conflict, widespread violence or other risks of harm to people. Armed conflict may take a variety of forms, such as a conflict of international or non-international character, which may involve two or more states, or may consist of wars of liberation, or insurgencies, civil wars, etc. High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence. Such areas are often characterized by widespread human rights abuses and violations of national or international law.

The so-called "Conflict Minerals", tin, tantalum, tungsten and / or gold are mined extensively throughout the DRC region. The DRC region includes the Democratic Republic of the Congo, Angola, Burundi, the Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

Siemens Gamesa is committed to ensuring that minerals contained in its products are sourced with due respect for human rights, that sourcing those minerals does not contribute to conflict, and that development is supported through the company's supply chain practices. This objective shall be observed in every conflict region worldwide.

Suppliers are expected to:

- **Take reasonable efforts to avoid in its products the use of raw materials which directly or indirectly finance armed groups who violate human rights.**
- Provide supply chain data fulfilling legal obligations and help identify smelters in our common supply chain.
- Document, implement and regularly check all the approvals and/or licenses required for the operation at their sites.

To increase knowledge about the origin and chain of custody of Conflict Minerals in their supply chain, Siemens Gamesa suggests that its suppliers use the standard Conflict Minerals Reporting Template of the [Conflict-Free Sourcing Initiative \(CFSI\)](#). This template is developed by the cross industry initiatives Electronic Industry Citizenship Coalition (EICC) and Global e- Sustainability Initiative (GeSI).

1 A supplier's relevance and scope of responsibility for occupational health and safety depends on the type of activities it performs, products or services it delivers and the industry in which it operates in. Refer to Appendix A which describes reasonable management systems and differentiates between three supplier categories.

8. Third party intermediaries – Business Partners

Siemens Gamesa's global activities entail collaboration with many different partners all over the world. Mutual trust is essential to these relationships. Under anti-corruption laws Siemens Gamesa can be held liable for the conduct of third party intermediaries such as sales agents, sales consultants, customs clearance agents, land developers, visa providers, and consortium partners.

For third party intermediaries Siemens Gamesa has implemented a special "Business Partner Compliance Due Diligence Process". This process and the description below apply to third party intermediaries regardless if the intermediary is also involved in the Siemens Gamesa procurement process.

Our Business Partner Compliance Due Diligence Process is structured and straightforward. It supports the selection of third party intermediaries subject to the necessary care and in line with compliance requirements and ensures that the relevant business relationship is responsibly evaluated and managed.

Prior to engaging a third party intermediary, Siemens Gamesa has to perform a compliance due diligence. Based on a risk assessment of the proposed business relationship, the due diligence questionnaires include internal information obtained from the third party as well as publicly available external information from independent sources.

The required information varies depending on the type and content of the planned business relationship and provides a transparent overview. The due diligence process is repeated at defined intervals.

The contract between Siemens Gamesa and the concerned third party will include specific compliance clauses. Suppliers' adherence to these contractual obligations will be monitored – which may include preventive or incident driven audits.

For the purposes of an audit, Siemens Gamesa requires an appropriate level of documentation which substantiates, in a transparent and clear manner, the activities of the third party, in order to ensure the appropriate use of the funds received from Siemens Gamesa and to ensure their compliance with the contract and with the applicable laws and regulations, especially with the anti-corruption related regulatory environment.

In case the aforementioned requirements are not fulfilled, this can have consequences up to a termination of the contractual relationship.

9. Reporting Channels

■ Reporting of possible misconduct

To justify the trust placed in Siemens Gamesa by customers, suppliers, shareholders, employees and other stakeholders of the company, we place the highest priority on the integrity and transparency of our business processes. Therefore, it is essential that Siemens Gamesa obtains knowledge of any compliance violations, in particular violations of the Siemens Gamesa internal Code of Conduct/Guidelines. Reliable reporting channels for internal and external stakeholders are indispensable for effective compliance, because they help ensure that possible misconduct is reported, thoroughly investigated and brought to light.

Like other external stakeholders and Siemens Gamesa employees, Siemens Gamesa suppliers can use protected channels to report possible misconduct to our company:

■ **Compliance whistleblower tool**

The compliance whistleblower hotline “Integrity Hotline” is for reporting compliance violations in a secure manner, 24 hours a day, 7 days a week, in 13 languages, online or via telephone. Reports can also be made anonymously. “Integrity Hotline” can be used by employees and management as well as customers, suppliers and other stakeholders.

The “Integrity Hotline” system is managed by a third party supplier. All data supplied in a report is maintained on secure servers in Germany. All reported content is handled exclusively by Siemens Gamesa Compliance. Siemens Gamesa internal whistleblowers are protected by special regulations that protect whistleblowers that make good faith reports to the best of their knowledge. Please be aware that intentional reporting of false information is prohibited by law in many countries.

Link to Integrity Hotline:

<https://www.bkms-system.net/bkwebanon/report/clientInfo?cin=23wd4&language=eng>

10. Appendix A

■ **Clarification on the term “reasonable management system” for health, safety and environment**

The following table classifies suppliers, contractors and other third party intermediaries (hereafter referred to as suppliers) into three categories and describes the requirements for “reasonable management system” regarding occupational health, safety and environmental protection. It is presumed that Category 1 suppliers are likely associated with lower risks, meaning they potentially have fewer health and safety hazards as well as less environmental impacts in comparison to suppliers in Categories 2 or 3. High risk activities include, but are not limited to:

- Working with chemicals (chemical processing, handling, storing, transporting, waste treatment)
- Working with waste (handling, storing, transporting, waste treatment)
- Working in manufacturing (processing or assembly) or construction sites
- Working with tools, heavy machinery and transport equipment or services
- Working with electrical equipment
- Working at heights or other exposed work areas
- Other high risk activities determined by the Procurement or HSE Specialist(s).

It is advised to consult a Procurement or HSE Specialist when it is unclear how a supplier is to be classified.

Information to Siemens Gamesa’s classification for:

- Sectors and Industry Groups is according to the Global Industry Classification Standard (GICS®)²
- Supplier size is according to the EU recommendation 2003/361 for defining micro-, small- and medium-sized enterprises³

² https://en.wikipedia.org/wiki/Global_Industry_Classification_Standard

³ http://ec.europa.eu/growth/smes/business-friendly-environment/sme-definition_da

Supplier category	Sector or industry group	HSE Requirements	HSE Deliverables
1	<ul style="list-style-type: none"> ■ Micro-, small- or medium-sized enterprises* that perform solely administrative tasks or offer advisory services (e.g. Industry Groups 2020, 2530, 2540, 2550, 4010, 4020, 4030, 4510, 5010). ■ Micro- or small-sized enterprises* that offer trade craftsman services. 	<p>Provides evidence that the supplier:</p> <ul style="list-style-type: none"> ■ Adheres to all applicable statutory and international legislation regarding occupational health and safety and environmental protection in relation to their operations as well as products and services. 	<p>The supplier:</p> <ul style="list-style-type: none"> ■ Signs the Siemens Gamesa Code of Conduct, confirms their compliance to the requirements therein and provides documented evidence of their compliance to the Code. ■ Provides documented evidence of their compliance to Category 1 requirements (e.g. valid permits, substance declarations and Safety Data Sheets, etc.).
2	<ul style="list-style-type: none"> ■ Enterprises with over 250 employees or with a turnover over €50 million or with a balance sheet total over €43 million that perform solely administrative tasks or offer advisory services (e.g. Industry Groups 2020, 2530, 2540, 2550, 4010, 4020, 4030, 4510, 5010). ■ Medium-sized enterprises* that offer trade/craftsman services. ■ Micro- and small-sized enterprises* that operate in the Energy, Materials, Industrials, Utilities or Real Estate Sectors (e.g. Industry Groups 1010, 1510, 2010, 2030, 2510, 4520, 4530, 5510, 6010). 	<p>Provides evidence that the supplier:</p> <ul style="list-style-type: none"> ■ Adheres to all applicable statutory and international legislation regarding occupational health and safety and environmental protection in relation to both their operations as well as products and services. ■ Maintains individual or integrated framework(s) for managing occupational health, safety and environmental aspects. For example: <ul style="list-style-type: none"> - Written statement of commitment to HSE by management (e.g. policy). - Defined roles and responsibilities in relation to HSE. - Measures for evaluating, reducing or eliminating potential health and safety risks/hazards and environmental impacts (e.g. procedures or instructions, improvement targets or programs). - Assurance that management and employees are qualified for and trained in HSE topics. - Processes for reporting HSE performance and controlling non-conformances (e.g. annual reports, audit records). <p>Note that a formalized management system (external certification body) is not necessary for Category 2 suppliers.</p>	<p>The supplier:</p> <ul style="list-style-type: none"> ■ Signs the Siemens Gamesa Code of Conduct, confirms their compliance to the requirements therein and provides documented evidence of their compliance to the Code. ■ Provides documented evidence of their compliance to Category 2 requirements (e.g. valid permits, policies, procedures or instructions, HSE data, substance declarations and Safety Data Sheets, etc.).

Supplier category	Sector or industry group	HSE Requirements	HSE Deliverables
3	<ul style="list-style-type: none"> ■ Enterprises with over 250 employees or with a turnover over €50 million or with a balance sheet total over €43 million that offer trade/craftsman services. ■ Medium-sized enterprises* and enterprises with over 250 employees or with a turnover over €50 million or with a balance sheet total over €43 million that operate in the Energy, Materials, Industrials, Utilities or Real Estate Sectors (e.g. Industry Groups). ■ All waste vendors, lifting operators for main wind turbine components and suppliers of non-destructive testing (NDT) that have an emitting source such as electromagnetic radiation regardless of enterprise size. In exceptional cases waste vendors can be classified as Category 2 suppliers if they exclusively treat non-hazardous waste, but a HSE Specialist shall be consulted prior to such a decision, in line with SGRE's Global Procedure-29650 Waste Management. 	<p>Provides evidence that the supplier:</p> <ul style="list-style-type: none"> ■ Adheres to all applicable statutory and international legislation regarding occupational health and safety and environmental protection in relation to both their operations as well as products and services. ■ Maintains individual or integrated framework(s) for managing occupational health, safety and environmental aspects. For example: <ul style="list-style-type: none"> - Written statement of commitment to HSE by management (e.g. policy). - Defined roles and responsibilities in relation to HSE. - Measures for evaluating, reducing or eliminating potential health and safety risks/hazards and environmental impacts (e.g. procedures or instructions, improvement targets or programs). - Assurance that management and employees are qualified for and trained in HSE topics. - Processes for reporting HSE performance and controlling non-conformances (e.g. annual reports, audit records). <p>Note that a valid and formalized management system is required for Category 3 suppliers for both occupational health and safety and environmental protection (e.g. ISO 45001, ISO 14001, EMAS. For other national certification schemes, a regional HSE Specialist shall be consulted).</p> <p>Note that suppliers who have implemented a formal management system with the elements from an external certification body, but have not yet achieved certification, have a three year transition period before they must obtain certification.</p>	<p>The supplier:</p> <ul style="list-style-type: none"> ■ Signs the Siemens Gamesa Code of Conduct, confirms their compliance to the requirements therein and provides documented evidence of their compliance to the Code. ■ Provides documented evidence of their compliance to Category 3 requirements (e.g. valid permits, certificates, policies, procedures or instructions, HSE data, substance declarations and Safety Data Sheets, etc.).

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