

VESTAS WIND SYSTEMS A/S  
SLAVERY AND HUMAN TRAFFICKING  
**STATEMENT** FOR THE FINANCIAL  
YEAR 1 JANUARY – 31 DECEMBER 2018

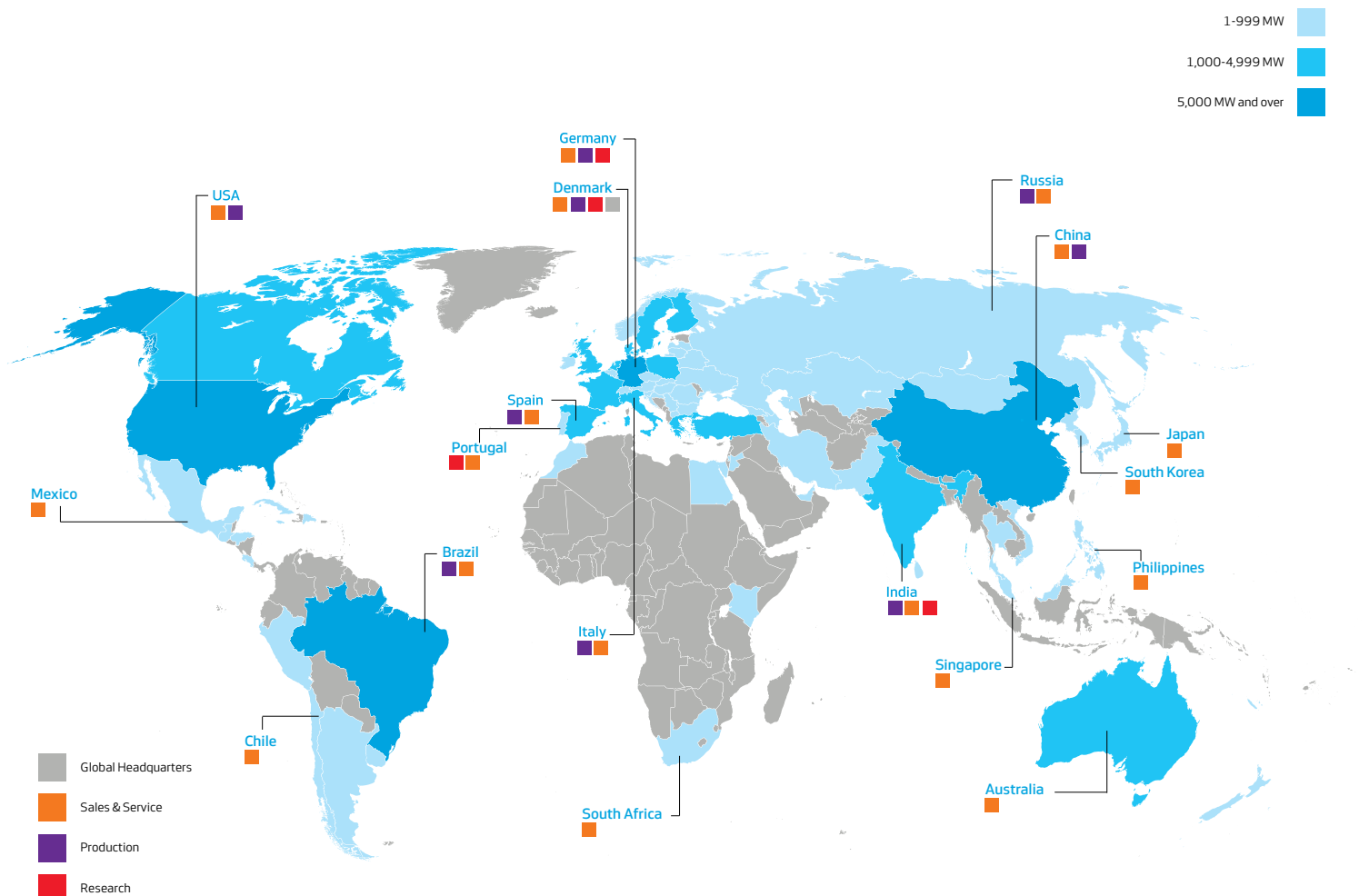
This Statement addresses the risk of slavery and human trafficking taking place in Vestas' business and supply chains, pursuant to section 54 of the UK Modern Slavery Act ("the Act"). The Statement covers Vestas Wind Systems A/S and its subsidiaries covered under the provisions of the Act.

## 1. Our organisation

Vestas is engaged in the business of developing, manufacturing, supplying and servicing wind turbine generators worldwide, as well as providing global solutions and services related to other sustainable energy sources. Vestas has offices globally and five

regional sales business units in Northern and Central Europe, Americas, Mediterranean, China and Asia Pacific. The Global headquarters is in Aarhus, Denmark and in 2018 Vestas had an average of 24,221 employees globally. We have 22 manufacturing, assembly, and research & development facilities in ten countries. Our supply chain is accordingly global.

Vestas is present in all regions of the world; in 2018 alone, Vestas' order intake was 14.2 GW from 43 countries. In 2018 Vestas' revenue was EUR 10,134m.



## 2. Policies and governance mitigating slavery and human trafficking

Vestas has been a UN Global Compact (UNGC) member since 2009, and is committed to implementing the UNGC 10 principles, including Principle 4 on elimination of all forms of forced and compulsory labour, into our business and our supply chain. The policies and procedures listed below outline how we uphold this commitment.

### Code of Conduct

Vestas operates according to its Code of Conduct, which is a set of rules and principles outlining how we expect our employees and business partners to behave. Vestas has both an Employee Code of Conduct and Business Partner Code of Conduct; they follow the UN Global Compact principles and are based on international standards, including the International Bill of Human Rights, the eight core conventions of the International Labour Organisation and the UN Guiding Principles on Business and Human Rights. The Vestas Codes of Conduct can be accessed [here](#).

Specifically stated in both Codes is the prohibition against forced or compulsory labour or child labour in any of our direct or indirect operations. Furthermore, fundamental labour conditions such as safety and working hours must also be respected.

### Human Rights Policy

The Vestas Human Rights Policy, signed by Vestas CEO Anders Runevad in February 2014, publicly expresses Vestas' commitment to respect human rights, to avoid infringing human rights, and to address any adverse human rights impacts with which Vestas may be involved, which is in accordance with the UN Guiding Principles on Business and Human Rights. Vestas Human Rights Policy specifically identifies our commit-

ment to avoid using or contributing to forced or compulsory labour.

Also stated in Vestas Human Rights Policy is that Vestas will take measures to promote that its business partners will respect human rights.

Vestas Human Rights Policy is distributed group-wide and communicated publicly.

### Recruitment policy

Recruitment is guided by our Recruitment Policy and processes. Vestas standard recruitment process is handled by the Vestas Recruitment Team, which is mainly outsourced to a global recruitment process partner. The recruitment partner has signed the new Vestas Business Partner Code of Conduct, committing to comply with our principles and requirements. We are satisfied that the recruitment partner's own policies and procedures are based on international standards.

Vestas holds regular meetings with the recruitment partner, with one dedicated annual meeting on sustainability, which includes the topic of modern slavery. To date there have been no significant issues to follow up on.

### Access to Remedy: EthicsLine

Both employees and business partners are encouraged to use our whistle-blower hotline "EthicsLine" to report observed or suspected malpractice. EthicsLine is available 24/7 and is accessible in 16 languages. In the case of such reports, which can be made anonymously, they will be investigated. Vestas encourages a culture of openness and will not tolerate retaliation against anyone who files a report in good faith, regardless of whether or not the claim can be substantiated.

We continuously raise awareness of EthicsLine, which is also supported by the Code of Conduct trainings.

## 3. Risks of slavery and human trafficking

All Vestas employees are processed and documented via our Recruitment Process. We believe that the checks and balances in place are adequate for mitigating risks of slavery and human trafficking within our operations, and thus our main focus is on our supply chain.

At Vestas we manufacture wind turbines and construct and service wind farm sites. Our suppliers include manufacturers of wind turbine components and suppliers performing services to wind farm construction and service sites.

In 2018 Vestas, together with external experts, updated its corporate-wide human rights impact assessment (HRIA), covering the value chains of Vestas business and activities. The most salient human rights risks across the Vestas value chain were mapped and prioritised. The HRIA report was finalised in December 2018, and we will be working on implementing the recommendations starting in 2019.

#### 4. Due diligence in our supply chain

Vestas expects its suppliers to uphold the principles in our Business Partner Code of Conduct. To support and validate this expectation, we have a due diligence process:

1. **Pre-screening:** Ethics and sanctions screening
2. **Self-Assessment:** Supplier must complete Vestas Code of Conduct assessment
3. **Supplier Creation:** Upon successful completion of previous steps, supplier is created in system
4. **On-site Assessment:** Cross-functional on-site assessment for high risk suppliers
5. **Manage Supplier Performance:** Supplier performance and relationship management.

We recognise that respecting human rights is a responsibility that requires continuous vigilance, and therefore we are revising our supplier due diligence process on a regular basis.

#### 5. Training & capacity building

All new employees are trained in the Vestas Employee Code of Conduct via an e-learning, as part of their mandatory orientation programme. Our hourly paid employees working in our manufacturing sites are introduced to our Code of Conduct via their orientation programme. According to the risk assessment, we have not identified specific modern slavery training as necessary for our employees.

In line with the HRIA results, Vestas is setting continued focus on training and awareness raising for suppliers and subcontractors in our HSE minimum requirements. Such activities include mandatory training requirements for subcontractors to access installations and rolling out our minimum HSE requirements to a broader supplier network.

#### 6. Continuous actions to support our responsibility

Vestas recognises its responsibility to respect human rights, which includes avoiding using or contributing to the use of modern slavery and human trafficking. We will continue to work towards understanding where the risks in our business and supply chain lie and will prioritise actions addressing the high-risk areas. Vestas appreciates that this work is an evolving process and will be reporting on our progress in the next Statement.

This Statement was approved by the Board of Directors of Vestas Wind Systems A/S on

Date: 7 May 2019



**Bert Nordberg**

Chairman, Vestas Wind Systems A/S