

Rules of Procedure for the Complaints Procedure pursuant to the German Supply Chain Due Diligence Act (GSCA)

Table of Contents

1. What is the complaints procedure, its scope and its objective.....	2
2. For what kind of complaints may the complaints procedure be used?	2
3. Who can make a complaint?	3
4. Which reporting channels can be used to submit information?	3
5. What happens once I have initiated a complaint?	3
6. How does the handling of the complaint look like timewise?	5
7. Are the complaints dealt with objectively, impartially and independently?	5
8. Is confidentiality maintained in the complaints procedure?	5
9. How are Whistleblowers protected from retaliation?	5
10. Is the complaints procedure checked for effectiveness?	6
11. Contact	6
Annex 1: Protected legal positions in respect of which complaints can be submitted	7

1. What is the complaints procedure, its scope and its objective

- The complaints procedure enables any person to confidentially report risks or violations of human or environmental rights or obligations in the supply chain of Nordex Group. The supply chain comprises the Nordex Group itself ("own business area") as well as direct and indirect suppliers of the Nordex Group. The complaints procedure creates a protected channel to communicate observations, information and concerns with respect to human or environmental risks and obligations.
- Every complaint made in good faith helps Nordex Group to identify human rights and environmental risks in the supply chain at an early stage and to take preventive and remedial measures without undue delay. It is therefore important to report such observations at an early stage.
- The main elements of the complaints procedure and your role as someone making a complaint or being a whistleblower are outlined below.

2. For what kind of complaints may the complaints procedure be used?

- Information regarding risks for or violations of human or environmental rights along the entire supply chain of Nordex Group may be reported.
- Human rights in particular comprise the prohibition of child labor, forced labor and slavery, the provision of occupational safety and health, freedom of association, non discrimination, minimum wage. ¹
- Environmental obligations arise in particular in connection with mercury, chemicals (persistent organic substances, so called POPs) and hazardous waste, prohibition of pollution, handling of waste, and the obligation to preserve natural resources such as soil, water, and air. ²
- The risks and violations covered are not only those within the companies, sites, production facilities, branches of the Nordex Group, but also those within the companies, sites, production facilities, branches of all suppliers of the Nordex Group as well as the suppliers of the suppliers. Therefore, the risks occurring within Nordex' own business area as well as of the direct and of the indirect suppliers may and shall please be reported.

Please note: Do not spend too much time on finding out if your complaint falls under Annex 1 - we'll take care of that with our team of experts. Report your observations and perceptions in the human rights and environmental spectrum, even if you are not sure whether they fall within the scope of the law.

¹ Please find attached a more detailed overview (Annex 1). For a detailed, more in depth description, please refer to the provisions of the German Supply Chain Act, the explanatory memorandum and the guidance of the Federal Office of Economic Affairs and Export Control (BAFA):
https://www.bafa.de/SharedDocs/Downloads/DE/Lieferketten/handreichung_beschwerdeverfahren.html

² Ibid.

3. Who can make a complaint?

- Anyone may make a complaint. This means that anyone may report, regardless of whether you work for the Nordex Group (as a permanent employee, temporary worker, intern, etc.), or have an external connection (e.g. as an employee of a supplier) or if you are any person of the general public outside of Nordex Group.
- A whistleblower does not have to be personally affected by the risk or violation; third parties such as observers may also make a complaint.
- You may also exchange information with interest groups regarding the complaint or ask to be represented by them when reporting (for example, representation/reporting by trade unions, NGOs or other third parties).

4. Which reporting channels can be used to submit information?

Complaints may be submitted as follows:

- Personal contact: for Nordex Group employees, concerns can be raised to the Chief Compliance Officer that can be reached at compliance@nordex-online.com.
- [Online portal](#): web based publicly accessible platform that can be accessed 24/7, 365 days a year from any computer with an internet connection. Available in all company languages. Complaints can be made anonymously, and full data security is guaranteed.
- Helpdesk: direct dialogue via telephone, email or post.
 - Phone: +49 40 30030 3030. Can generally be reached on weekdays from 9:00 a.m. to 5:00 p.m. (CET). Outside this time period, it is possible to leave a voicemail.
 - Email: notify@nordex.whistleblowermail.com
 - Post: Nordex SE, Corporate Compliance, Langenhorner Chaussee 600, 22419, Hamburg (Germany).

5. What happens once I have initiated a complaint?



Overview of steps:

Step 1: Receipt of the complaint

You make your complaint via any of the three "notify!" reporting channels mentioned above (point 4).

Rules of Procedure for the Complaints Procedure pursuant to the German Supply Chain Due Diligence Act (GSCA)

In case you choose the Online portal, you will submit your concern and create a so called secure mailbox. You will be assigned a case ID and a password.

IMPORTANT: Please make a note of these access credentials, otherwise you will no longer be able to access the secure mailbox and cannot retrieve our reply. You can use this mailbox to make your complaint and to communicate securely and, if you wish, anonymously throughout the entire procedure, e.g. about the status of the case. In case you would like to submit the complaint orally, you can leave a voice message via the online portal by recording a sound clip, which will be encrypted and obfuscated. You can select your language and country when entering the information. Documents, pictures, and sound clips can be uploaded as attachments. Receipt of your complaint will be confirmed at the latest after seven days starting with the receipt and your complaint will be documented. Confidential processing of the information is guaranteed throughout the entire procedure.

Step 2: Examination of the complaint

Your complaint will be created as a case and then processed by Corporate Compliance, i.e. it will be checked for plausibility and the further procedure and responsibilities will be determined. The Business Ethics Committee evaluates the case and determines whether an investigation is necessary and the responsible function to be involved (internal or external). As a steering committee, it supervises the investigations of all violations of Human Rights and/or Environment that fall under the German Supply Chain Act. An investigation is only initiated after careful examination of the facts and concrete evidence of a regulatory violation. Generally, you are likely to be contacted at such an early stage of the process for an exchange of further information on the case. If desired, you may remain anonymous if you use the Online portal.

Step 3: Clarification of the facts

The facts of the case will be discussed with you (you can remain anonymous if you wish). If the case is closed (i.e. the complaint was unsubstantiated), you will receive an explanation. **IMPORTANT:** As we recommend creating a secure inbox when reporting via Online portal, please make a note of your access credentials, so you can submit more information about the case, answer potential questions and receive updates at any time. If the complaint is not closed, a solution will be worked out in step 4.

Step 4: Development of a solution

A proposal for a solution will be worked out by the relevant department (e.g. Legal, People & Culture, Sustainability or others) on the basis of the facts ascertained. This will be discussed with you if you yourself are affected as a whistleblower.

If you are not personally affected, you will be at least informed of the proposed solution. If necessary, agreements on compensation will be made. We will comply with all relevant data protection regulations. Please note that this may also affect the amount of information we provide to you.

Step 5: Remediation

The agreed measures for remediation, i.e. measures to end the violation immediately (if possible), are implemented. The implementation shall be carried out by the responsible legal entity (e.g. Nordex Group entity/direct supplier/indirect supplier) or department.

Step 6: Review of the remediation and conclusion of the case

Rules of Procedure for the Complaints Procedure pursuant to the German Supply Chain Due Diligence Act (GSCA)

The implementation of the remedy will be reviewed and evaluated by the relevant department. An interim report on the results will be prepared by the relevant department (e.g. Legal, People & Culture, Sustainability or others). If you were affected yourself, the result of the evaluation will be discussed with you. In all other cases you will receive a report. If the risk or violation has been sufficiently eliminated, the interim report becomes the final report and the case is closed.

6. How does the handling of the complaint look like timewise?

The investigation and remediation teams work as efficiently as possible to verify and solve problems. Every investigation and every remediation is different and therefore the time required may vary. However, the Nordex Group strives to deal with all cases quickly, i.e. within weeks rather than months.

The following applies: The more serious the risks/violations in question are in terms of intensity and extent, the faster remedial action must be taken; ideally, the violation will be stopped immediately. In any case, whistleblowers must be given feedback on their complaint within three (3) months at the latest from the date on which receipt of the complaint was confirmed. If the examination takes more than three (3) months, the whistleblower must be given feedback at regular intervals, at least every three (3) months. If you have made the complaint via Online portal, you will receive this feedback via the electronic reporting system. Therefore, please make a note of your access credentials.

7. Are the complaints dealt with objectively, impartially and independently?

- Cases are processed and reviewed objectively and impartially. Access to information is limited to those persons who absolutely need this information to process a case (need-to-know principle).
- The persons involved in case review and processing act independently. This means that they are impartial and independent how they handle a case and are not bound by instructions. Respective clauses – including also a confidentiality clause – have been addressed with the concerned persons and have been implemented.

8. Is confidentiality maintained in the complaints procedure?

- The persons involved are obliged to maintain confidentiality. Your identity as a whistleblower will be treated confidentially. This also applies if the suspicion ultimately proves to be unfounded. If you wish, you may also remain anonymous during the procedure.
- All reporting channels are confidential channels through which you can report concerns about actual or potential risks and violations of human rights and environmental obligations or respective misconduct.

9. How are Whistleblowers protected from retaliation?

- Nordex Group does not tolerate any retaliatory measure as punishment for filing a report as whistleblower (in particular discrimination, punishment, measures under labour law, etc.) against persons who report concerns/observations in good faith or who are involved in a subsequent investigation. This applies even if the concerns are ultimately unfounded.

Rules of Procedure for the Complaints Procedure pursuant to the German Supply Chain Due Diligence Act (GSCA)

- Retaliation for such reports is strictly prohibited at all Nordex Group companies and would be punished as serious misconduct, which is also a principle set forth in our [Code of Conduct](#), which you can access on Nordex Group public website, which you can access on Nordex Group public website.
- To the extent feasible, Nordex Group will also work towards their suppliers to ensure non retaliation in case complaints are issued by the supplier's employees and in case Nordex Group becomes aware of retaliation.

10. Is the complaints procedure checked for effectiveness?

- Nordex Group will initiate yearly and ad hoc effectiveness tests of the complaints procedure according to section 8 paragraph 5 of the German Supply Chain Act. If necessary, adjustments are made to the procedure.
- The effectiveness testing is an essential part of the complaints mechanism and will be done according to specific KPIs provided by the German Federal Office for Economic Affairs and Export Control (BAFA).

11. Contact

Nordex Group attaches great importance to human rights and the protection of the environment. With your complaints, you support us in the sustainable protection of these important goals. In case of any further questions, please reach out to compliance@nordex-online.com.

Thank you for your assistance.

The Rules of Procedure for the Complaints Procedure pursuant to the German Supply Chain Due Diligence Act (GSCA) will take effect from 14 December 2023.



José Luis Blanco
Chief Executive Officer



Dr. Ilya Hartmann
Chief Financial Officer



Patxi Landa
Chief Sales Officer

Annex 1: Protected legal positions in respect of which complaints can be submitted

Human rights risk of the GSCA

Protection of workers sec. 2 (2) no. 1 – 8	Protection of livelihoods sec. 2 (2) no. 9 – 10	Protection against abuse through security forces sec. 2 (2) no. 11
1. Prohibition of child labor below the minimum permissible age in accordance with the applicable law of the state of employment 2. Prohibition of the worst forms of child labor 3. Prohibition of the employment of persons in forced labor 4. Prohibition of all forms of slavery 5. Prohibition of the disregard of labor protection 6. Prohibition of disregard for freedom of association 7. Prohibition of unequal treatment in employment relationships 8. Prohibition of the withholding of a reasonable wage	9. Prohibition of contamination of air, water or soil, and prohibition of causing excessive consumption of water 10. Prohibition of unlawful eviction and unlawful deprivation of land, forest and waters	11. Prohibition of the hiring or use of private or public security forces that, due to lack of instruction or control, disregard the prohibition of torture or cause injury to life or limb, or interfere with freedom of association
Catch-all provision, sec. 2 (2) no. 12 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."		

Environmental risks of the GSCA

Handling of mercury sec. 2 (3) no. 1 – 3	Handling of persistent organic pollutants , sec. 2 (3) no. 4 – 5	Handling of hazardous waste sec. 2 (3) no. 6 – 8
1. Prohibition of the manufacture of mercury-added products 2. Prohibition of the use of mercury and mercury compounds in manufacturing processes 3. Prohibition of treatment of mercury waste	4. Prohibition of the production and use of certain chemical pollutants 5. Prohibition of non-environmentally sound handling, collection, storage and disposal of certain wastes	6. Prohibition of export of hazardous waste and other waste (according to the Basel Convention) 7. Prohibition of export of hazardous waste depending on state of export and import 8. Prohibition of import of hazardous waste and other waste