

# Modern Slavery Act Statement

**Financial Year 2025**



# About this statement

## Scope & Purpose

This is the annual Modern Slavery Statement to be published by Vestas Wind Systems A/S (Vestas) and its subsidiaries in accordance with section 54 of the UK Modern Slavery Act 2015 (“the Act”). This statement covers Vestas and its subsidiaries for the financial year ending 31 December 2025.

This document is prepared in accordance with international guidelines, such as the United Nations Guiding Principles on Business and Human Rights and it underscores Vestas’ commitment to respecting human rights.

# About Vestas

## Structure & Operations

Vestas designs, manufactures, installs, and services wind turbines worldwide.

Vestas is headquartered in Denmark and has offices globally with more than 36,000 employees. Vestas operates across five commercial regions: Mediterranean, Latin America, North America, Northern and Central Europe, and Asia Pacific. Vestas has manufacturing, assembly, and research and development facilities in 10 countries and has installed wind turbines on- and offshore in over 88 countries. In the year 2025, Vestas' revenue amounted to EUR 18,8bn.

Vestas is structured into six Executive Vice President areas: Finance, Sales, Service, Technology & Operations, People & Culture and Development & Digital Solutions.

For further information visit [www.vestas.com](http://www.vestas.com).

## Supply Chain

Vestas engages with suppliers around the world.

Vestas classifies its suppliers into three scopes. The first is "direct scope", meaning our suppliers that deliver parts (components and materials) used in Vestas wind turbines. The second is "indirect scope" meaning the suppliers that deliver services to factories and wind parks. The third is "service scope" which includes suppliers that support our service operations.

Supplier expenditure predominantly falls within the following spend categories:

- direct procurement for blades, nacelles, towers and steel, hub, electrical and powertrain
- indirect procurement for transport, construction, IT & business services, and CAPEX, Tools, and MRO (Maintenance, Repair and Operations); and
- service procurement which includes service material procurement and service solutions procurement.

# I. Policy Commitment

## Embedding responsible business conduct into policies & management systems

Our Global Compliance and Corporate Social Responsibility (CSR) team includes human rights experts based in Denmark and India. The team works alongside Sustainable Procurement who have human rights expertise and other departments across the organisation to ensure that human rights are embedded into the business.

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

## Codes of Conduct

Vestas operates according to its Codes of Conduct, which are a set of rules and principles that outline expectations towards employees and suppliers. Vestas has both an Employee Code of Conduct and a Supplier Code of Conduct. We are committed to the United Nations Guiding Principles (UNGPs) on Business and Human Rights and in addition Vestas is guided by the Organisation for Economic Co-operation and Development's (OECD) Guidelines for Multinational Enterprises on responsible business conduct. We therefore respect all internationally recognized human rights, including the Universal Declaration of Human Rights and the International Labour Organization (ILO) Declaration of Fundamental Principles and Rights at Work.

Both Codes specifically prohibit the use of modern slavery or human trafficking within Vestas' global business.

The Supplier Code of Conduct outlines our expectations to suppliers in four main areas: Human Rights and Labour Rights, Working with Integrity, Respecting the Environment, and Fair Business Practices. The Code is an integrated part of our purchase agreements and applicable to all suppliers. In addition to suppliers' own workers, we also request our suppliers to take diligent and reasonable steps to prevent human and labour rights violations within their own supply chains. Vestas suppliers are required to follow our Supplier Code of Conduct. If a supplier does not follow the Supplier Code of Conduct, Vestas reserves the right to take necessary

actions to mitigate risk, and the relationship with the supplier can be terminated.

Both Codes of Conduct can be found at [www.vestas.com](http://www.vestas.com).

## Human Rights Policy

In accordance with the UNGPs, our Human Rights Policy publicly conveys Vestas' commitment to respecting human rights, to avoid infringing on human rights, and to address any adverse human rights impacts Vestas may be involved in. The Human Rights Policy specifically states our commitment to avoid using or contributing to forced or compulsory labour.

Our Human Rights Policy is signed by Vestas' Chairman.

The Human Rights Policy also states that Vestas will take measures to promote that its suppliers and other business partners respect human rights. It is distributed group-wide and communicated publicly at [www.vestas.com](http://www.vestas.com).

In order to manage human rights risks in the supply chain, we embed requirements from our Human Rights Policy into our onboarding and due diligence process, aiming to build a sustainable and resilient supply base. In addition to our Human Rights Policy and Supplier Code of Conduct, we supplement the management of potential risks related to value chain workers with the Vestas Conflict Minerals Policy.

## Conflict Minerals Policy

Vestas maintains a separate policy on conflict minerals. This policy reflects our commitment to responsible sourcing practices and is aligned with the OECD Due Diligence Guidance. We engage with our suppliers through our Conflict Minerals Programme (see page 6) to ensure that minerals and metals, particularly tin, tantalum, tungsten, and gold (3TGs), sourced for our products do not originate from conflict-affected or high-risk areas. Conflict-affected and high-risk areas are characterised by the presence of armed conflict, widespread violence, or other risks of harm to people.

This policy applies to all eligible direct suppliers, and we mitigate risks associated with value chain workers by leveraging our influence and requiring suppliers to conduct additional due diligence in their supply chains upon identifying any risks. The policy, signed by the GSVP, Global Procurement, is available at our corporate website.

## Recruitment Policy and Processes

Vestas has established a comprehensive recruitment policy that adheres to the principles of consistency, global alignment, and compliance with applicable laws. This policy applies uniformly to all employees, irrespective of their employment status as salaried or hourly paid. The recruitment process at Vestas is well-structured and comprehensive.

Recruitment for both salaried and hourly-paid employees is managed by the Vestas Recruitment Team, a part of the People & Culture function. This team is guided by our Global Recruitment Process, which ensures a standardized and efficient approach to talent acquisition. They provide necessary guidelines, templates, and a global toolkit to ensure uniformity in recruitment practices across all regions.

The Vestas Recruitment Team outsources a significant portion of the recruitment process to a global recruitment partner. This partner is required to comply with Vestas' Recruitment Framework and overall processes, including adherence to our Supplier Code of Conduct. This ensures that our commitment to ethical practices and standards is upheld throughout the recruitment process.

In each of our regions, we have designated Regional Recruitment Managers, and they oversee the implementation of the Global Recruitment Process by our global recruitment partners. They ensure that the process is followed accurately and consistently across all regions.

The recruitment team works closely with hiring managers, providing them with necessary training and support to uphold this commitment. They also provide training and support to the personnel involved in recruitment process, helping them understand the importance of following the hiring process.

## II. Human Rights Due Diligence Processes

### Risk in our own Operations

The recruitment of factory workers at Vestas is now fully led by the Global Talent Acquisition (TA) team, which has implemented a standardized, global recruitment process. Throughout 2023 and 2024, Vestas focused on establishing a unified global framework for selecting and managing recruitment suppliers for factory positions. As part of this effort, factories have been gradually integrated into the formal recruitment process, which is now managed centrally by the TA team.

Several factories rely heavily on temporary workers to accommodate fluctuations in manufacturing demand. To support this, these factories now operate under Master Supply Agreement or local agreements designed to streamline and govern the use of recruitment providers at each site globally. This mapping exercise, initiated in 2021, enabled Vestas to begin reducing the number of recruitment partners and to ensure consistent alignment with global procurement practices. This includes compliance with contracting requirements and adherence to Vestas' Supplier Code of Conduct.

### Training & Capacity Building

At Vestas, we believe that effective recruitment is the foundation of our success. To ensure adherence to our policies, procedures, and processes, we have implemented a comprehensive Training & Capacity Building programme. This programme is designed to equip both our employees involved in the recruitment process and our recruitment partners with the necessary knowledge and skills.

The training begins at the onboarding stage. New employees and partners are introduced to our Global Recruitment Process, which outlines the standards and procedures for recruitment at Vestas. They are also familiarized with our Recruitment Framework and Employee Code of Conduct, which emphasize ethical practices and compliance with labour laws.

Our training programme is not a one-time event, but a continuous process. We provide regular training sessions, workshops, and seminars to keep our employees and partners updated on the latest trends in recruitment, changes in labour laws, and updates to our internal policies and procedures. These training sessions are conducted by experienced professionals and

industry experts, ensuring that the training is relevant and effective.

### Risks within Supply Chain

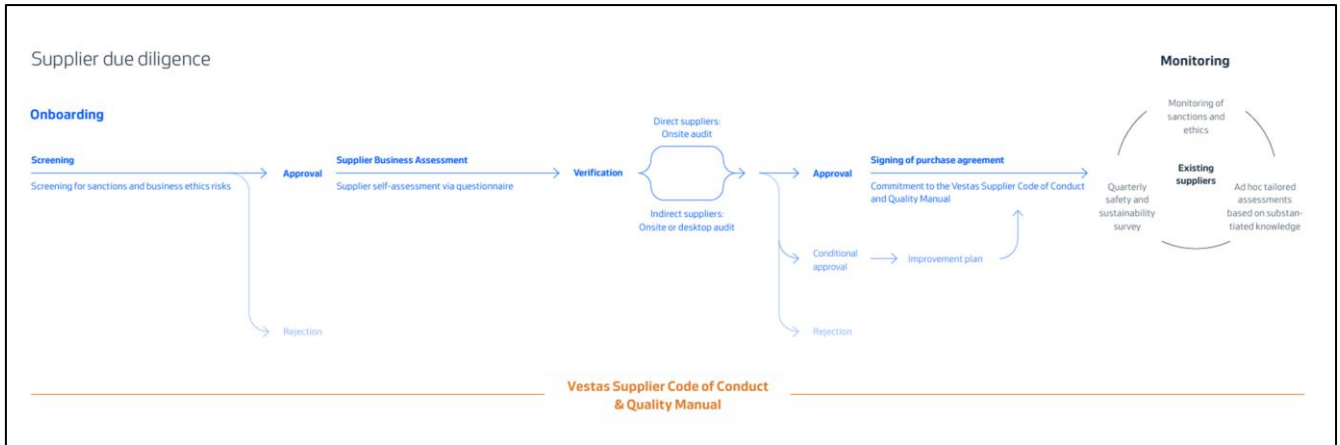
Vestas operates within a global supply chain that includes both upstream suppliers responsible for producing components and extracting raw materials, and downstream suppliers who deliver products and services at wind farm sites. These collaborations are essential to our business; however, they may also contribute to potential negative impacts within our value chain. To address and mitigate such risks – whether Vestas may contribute to or be directly linked to them – we request our suppliers to take diligent and reasonable steps to prevent human and labour rights violations within their own supply chains as outlined in Vestas' Supplier Code of Conduct.

Our value chain involves a diverse workforce, including employees in the upstream supply chain working at suppliers' manufacturing facilities, individuals involved in raw material extraction, and downstream contractors working on the construction and servicing of wind turbines. Recognizing that certain worker groups may face higher vulnerabilities, such as migrants, young workers, and women, in certain high-risk regions, Vestas is committed to promoting fair treatment, safe working conditions, and equal opportunities for all individuals throughout our supply chain.

### Corporate Wide Human Rights Assessment

Our Corporate-Wide Human Rights Assessment (CW-HRA) is the core foundation with which we identify adverse impacts and risks, and thereby is integral in the identification of appropriate actions and responses needed. To strengthen our human rights governance, in 2023 we established a steering committee with cross-functional members from CSR, People & Culture, Sustainable Procurement, and Health, Safety, and Environment, and we continued to work on implementing the recommendations of our CW-HRA during 2025.

For the supply chain, the adverse human rights risks are generally managed through our standard due diligence processes. We have, however, prioritized child and forced labour and conflict affected areas with additional initiatives due to the severity of the impacts. Vestas can be seen as linked to some of the adverse impacts taking place in our upstream value chain, although we rarely contribute to them. However, due to their salience we strive to explore ways to use our leverage.



## Due Diligence Processes

Vestas applies a supplier due diligence framework that covers both direct and indirect suppliers with whom we maintain contractual relationships. This framework is designed to identify and address potential adverse impacts and risks within our supply chain. At its core is the Vestas Supplier Code of Conduct, which sets out mandatory expectations for suppliers and their subcontractors regarding labor standards and human rights.

As part of onboarding, new suppliers are screened for sanctions and business ethics risks, followed by completing a Supplier Registration Questionnaire that includes an explicit commitment to the Vestas Supplier Code of Conduct. This commitment is required to proceed with the Supplier Business Assessment (SBA), which is tailored to the supplier’s scope of supply. SBA results are verified through either onsite or desktop assessments.

For indirect suppliers, we apply a risk matrix that considers onboarding questionnaire results and global risk intelligence criteria to determine which suppliers require onsite assessments. Direct suppliers, however, undergo onsite assessments as a standard procedure. These assessments are primarily performed by Vestas’ own teams and involve reviewing relevant policies, procedures and management systems related to human and labor rights to identify potential risks. Corrective action plans are developed for identified areas of improvement.

We also monitor existing suppliers on an ongoing basis to ensure that standards are upheld. This includes ad hoc assessments based on substantiated knowledge, media coverage, or other credible sources. While we work collaboratively with suppliers to improve performance, we are prepared to terminate relationships if material concerns persist. Our commitment to secure supplier adherence to the Supplier Code of Conduct helps safeguard our supply chain workers from risks.

Our current supplier assessment framework is illustrated above:

Note: The Supplier Due Diligence framework is currently undergoing revision. We plan to begin introducing the new Supplier Lifecycle Management Framework (due diligence) in 2026.

## Responsible sourcing of raw materials

### Conflict Minerals

Vestas has implemented a Conflict Minerals Programme (CMP) to mitigate the risks of adverse human rights impacts associated with raw material extraction, including forced and child labor. Each year, as part of this programme, we survey our direct suppliers whose components are most likely to contain conflict minerals. The survey is carried out through a third-party supply chain data management platform.

In 2025, we completed the fifth iteration of suppliers engaged in Vestas’ CMP, which involved engaging 104 suppliers (2024: 181). We have fewer suppliers participating in the survey because we are focusing only on those whose products may contain 3TGs (tin, tungsten, tantalum, and gold). Suppliers who previously confirmed their products do not include these minerals have been excluded from the survey.

This approach ensures that our focus is directed toward suppliers where the due diligence efforts are most needed to address potential risks and impacts. These risks are identified based on information provided by suppliers through the Conflict Minerals Reporting Template (CMRT), which includes, among other elements, details on the country of origin of minerals. Most suppliers submit responses at a company-wide level, covering all products they manufacture rather than those supplied specifically to Vestas. While this may introduce some uncertainty regarding Vestas-specific components, the approach nevertheless provides valuable insights that enhance our ability to identify and manage potential risks, improving the

resilience of our supply chain. The supplier response rate for 2025 was 93 percent, a slight decrease from 2024 (99 percent), yet still high compared to similar programmes.

Additionally, in 2025 we participated in an annual smelter outreach initiative facilitated by the third-party supply chain data management platform, encouraging non-conformant smelters to engage with the Responsible Minerals Assurance Process (RMAP) through an independent audit. We continue committed to upholding the responsible sourcing principles outlined in our Conflict Minerals Policy and the Supplier Code of Conduct.

### **EU Critical Raw Materials Mapping**

In 2025, we finalized our cross-collaborative initiative to map the minerals covered in the EU Critical Raw Materials Act, including conflict minerals and rare earth elements, across our components. This mapping enabled us to determine which components contain critical raw materials and formed the basis for expanding our Conflict Minerals Programme to include these additional materials.

The aim of this expansion is to also ensure that suppliers use conformant smelters and thereby mitigate risks of adverse human rights impacts in our supply chain. This programme increases supply chain transparency on the critical raw materials which have been used in our components.

### **Other Initiatives**

#### **Assessment of various third-party sustainability ratings**

In 2025, a new initiative was launched to further support Vestas' supply chain diligence. In alignment with Vestas' due diligence framework, Supplier Code of Conduct and subject to confidentiality obligations, Vestas is requesting selected suppliers to disclose their most recent third-party sustainability rating. This complements Vestas' internal assessments and supports transparency across the value chain. Looking forward, Vestas intends to align this initiative with the revision of our overall Supplier Due Diligence Framework.

#### **Wind Energy Initiative and EcoVadis implementation**

In 2024, Vestas joined the Wind Energy Initiative, a multistakeholder collaborative effort between EcoVadis, WindEurope, other OEMs, and customers. The initiative aims to enhance supply chain transparency and improve performance standards across ESG topics. As part of this commitment, we have adopted a more structured approach to engage suppliers through EcoVadis assessments. Vestas will work closely with suppliers to

implement corrective actions and address identified sustainability gaps.

In 2025, we hosted a series of supplier-focused webinars under the Wind Energy Initiative to support progress across the network, and we plan to continue offering more sessions in 2026. These webinars are designed for representatives of Vestas' suppliers.

#### **Tracking Implementation and Results**

Vestas has not yet set specific targets related to workers in our value chain, but plans to do so as part of the Supplier Lifecycle Management Framework (due diligence), to start integration in 2026.

Furthermore, we will explore options for establishing specific targets and for measuring the effectiveness of our policies and actions through enhanced data collection. In the meantime, we continue to assess our suppliers and monitor their performance.

In 2025, we assessed our suppliers by:

- conducting 2,164 due diligence screenings of potential suppliers, prior to the suppliers onboarding process (2024: 2,110).
- conducting 180 onsite supplier assessments for both direct and indirect suppliers (2024: 141).
- 148 of these suppliers scored above 70, meeting our acceptable risk threshold based on our methodology.
- For the 32 suppliers that scored below 70 percent (2024: 27), corrective action plans were developed and agreed upon by Vestas and the supplier. Of these, five suppliers were rejected.

## III. Remediation

### EthicsLine

EthicsLine is our whistleblower system and main mechanism for identifying, reporting and investigating concerns, promptly, independently and objectively as defined in the EthicsLine Policy. It accommodates both internal and external stakeholders. It allows employees and business partners to report suspected violations of Vestas Code of Conduct, applicable laws, and Vestas policies. Hosted on a secure external platform, it ensures anonymity and protection from retaliation. The platform is accessible publicly on our corporate website, the Vestas Compliance app, and our intranet.

To raise awareness, we conduct training sessions and communication initiatives across Vestas. Training materials, translated into several languages, are available on the intranet and include anonymized EthicsLine cases. Furthermore, employees managing cases received training on case management in 2025.

In 2025, 922 EthicsLine cases were raised, with 175 substantiated and 575 cases unsubstantiated. The remainder were still under investigation at the end of the year. Additionally, 111 of the substantiated cases were related to social or human rights areas, including termination of employment. We perceive the number of EthicsLine reports as an indication of high awareness and trust in the whistleblower system.

### Grievance Mechanisms in Supply Chain

In addition to requiring suppliers to establish their own grievance mechanisms, the Vestas Supplier Code of Conduct specifies that our EthicsLine - Vestas' whistleblower system - is also available to suppliers and supply chain workers to raise concerns anonymously.

Vestas is committed to providing or enabling remedy where actual material impacts occur. To support this, we maintain a structured process for receiving, tracking, and managing reports submitted by supply chain workers. Cases submitted through EthicsLine are recorded under a dedicated category.

If a case involves Vestas employees, it is handled by the EthicsLine team in collaboration with Sustainable Procurement and, where appropriate, the relevant supplier. If the case does not involve any Vestas employees, it will be handed over to the supplier.

In 2025, 11 concerns related to our suppliers and/or supply chain workers were reported to EthicsLine. The cases were handled in close collaboration with the suppliers, and three cases were substantiated.

Although Vestas does not systematically measure supply chain worker awareness or trust in these mechanisms, insights from some reports suggest that awareness varies across different parts of the value chain.

In line with the EU Whistleblowing Directive, EthicsLine's effectiveness is ensured by making the system accessible to value chain workers, protecting reporters from retaliation, safeguarding confidentiality, guaranteeing that reporters receive timely feedback, having an investigation process to secure objectivity, and building transparency into the process.

EthicsLine is anchored in our EthicsLine Policy, which ensures protection against retaliation. Where Vestas is linked to, or may have contributed to, adverse impacts involving supply chain workers, we seek to use leverage to promote that negative impacts are effectively remedied, and we monitor the case closely.

## An outlook in the future

Vestas has a responsibility to respect human rights, which includes ensuring our activities to not cause or contribute to the use of modern slavery and human trafficking and to avoid being directly linked to such harm.

To further mitigate forced labour and child labour risks in our supply chain, we are expanding our Conflict Minerals Programme by engaging more closely with suppliers whose products contain additional critical raw materials. This work will strengthen transparency and oversight across our value chain. In 2026, we plan to begin introducing our revised Supplier Due Diligence Framework to continue to support a structured and consistent approach to risk identification and mitigation, ensuring alignment with our broader sustainability and governance priorities.

Vestas has reviewed the UK Government's updated statutory guidance on modern slavery reporting issued in March 2025, which sets more detailed expectations for disclosures and places greater emphasis on demonstrating practical implementation, outcomes, and continuous improvement. Vestas will continue to align future statements with these enhanced expectations.

The UK Government has also announced significant reforms to the Modern Slavery Act's transparency

requirements, which will apply to financial years ending on or after 31 March 2026. These reforms introduce mandatory reporting across six defined areas, mandatory director sign-off, a central government registry for publication, and unlimited fines for non-compliance. While these changes do not apply to this 2025 Statement, Vestas will ensure its reporting and governance frameworks are prepared to meet the strengthened requirements.

We will continue to create transparency in our business and supply chains, with the aim of mitigating this risk through our policies, procedures and stakeholder engagement. Vestas acknowledges that this work is an evolving process and will be reporting on our progress in the 2026 statement. This Statement was approved by the Board of Directors of Vestas Wind Systems A/S on:

Date: May 11, 2026

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*Anders Runevad*

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Advisor

Anders Runevad

Chairman, Vestas Wind Systems A/S

Date: May 11, 2026

Signed by:

*Henrik Andersen*

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CEO

Henrik Andersen

CEO, Vestas Wind Systems A/S