

A sustainable culture

Managing sustainability

[Organising sustainability](#)
[Key impacts, risks and opportunities](#)
[Stakeholder engagement](#)
[Material issues](#)
[Management systems](#)
[Suppliers](#)
[Commitments and policies](#)
[Sustainable products](#)
[Safety](#)
[Environment](#)
[Employees](#)
[Reporting](#)

To encourage a company-wide sustainability culture, Vestas invests in nurturing and developing knowledge and skills of our employees, so everyone is empowered to work towards a shared vision of sustainability. At every level of the organisation awareness is raised to minimize sustainability risks. Decisions should always take into consideration the financial, but also the ecological and social consequences.

Our targets

Safety	Target 2012	Year end 2012	Target 2015
Incidence of industrial injuries (1)	3.0	2.8	0.5
Environment and Product Stewardship			
Carbon footprint (2), grams of CO2 per kWh		6.3	6
Recyclability (2), %		81	85
Renewable energy, %		52	55
Renewable electricity, %	100	89	

1. Per one million working hours
2. Baseline is the Life Cycle Assessment performed on the V112-3.0MW (Class IECII, 33 wind turbines, 8 m/sec wind speed)

Vestas is committed to delivering value to its customers. In the power generation industry, reliability is key. Securing outstanding performance levels for all wind turbines through Six Sigma philosophy is a major objective for Vestas because achieving parity with oil, gas and coal requires this level of quality. Vestas has implemented Six Sigma as the Group's key quality improvement tool for Vestas' own factories and its suppliers in all regions.

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[»> Sustainability data](#)
[»> GRI index](#)
[»> Contact us/Feedback](#)

Organising Sustainability

Managing sustainability

Organising sustainability

Key impacts, risks and opportunities

Stakeholder engagement

Material issues

Management systems

Suppliers

Commitments and policies

Sustainable products

Safety

Environment

Employees

Reporting

Responsibility for Sustainability performance lies in the line organisation. To support the line organisation a sustainability organization is established covering all parts of the line organization.

A corporate Sustainability department is responsible for the overall area, including global policies, KPI's and requirements, and is developing and driving the implementation of global standards and training programmes.

Board committees

Vestas [board committees](#) are overseeing Vestas' focus on sustainability. Two out of three discuss sustainability issues at their meetings.

The board committees that touch upon Sustainability issues are the Audit and the Technology & Manufacturing Committee.

Audit Committee

The Audit Committee assists the Board in assessments and controls relating to auditing, accounting policies, systems of internal controls, financial reporting, and procedures for handling complaints regarding accounting and auditing and the need for an internal audit function. The cases filed in Vestas whistle blower system, [Vestas Ethics Line](#), are reported here.

The Audit Committee monitors the development and implementation of Vestas' ethics and anti-corruption program pursuant to Vestas' Code of Conduct and the World Economic Forum Partnering Against Corruption Initiative (PACI).

The purpose is also to evaluate the adequacy and effectiveness of Vestas' ethics and anti-corruption programme and to demonstrate visible and active commitment to the implementation.

In 2012, the committee held four meetings.

Technology & Manufacturing Committee

Among other things, the Technology & Manufacturing Committee assists the Board of Directors in assessing technological matters, IPR strategy and product development plans. The committee also supports the Board in matters concerning production, monitors and evaluates the short and long-term manufacturing footprint, evaluates sustainability performance and gives support to forums such as Vestas' Innovation Portfolio Council, Product Portfolio Council and Product Operation Council.

In 2012, the committee held four meetings.

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[»> Sustainability data](#)

[»> GRI index](#)

[»> Contact us/Feedback](#)

Key impacts, risks and opportunities

Managing sustainability

[Organising sustainability](#)
[Key impacts, risks and opportunities](#)
[Stakeholder engagement](#)
[Material issues](#)
[Management systems](#)
[Suppliers](#)
[Commitments and policies](#)
[Sustainable products](#)
[Safety](#)
[Environment](#)
[Employees](#)
[Reporting](#)

In Vestas we believe that energy is the foundation for a better quality of life. A stable energy supply is an essential part of the infrastructure for a developed society.

Energy is central to nearly every major challenge and opportunity the world faces today. Be it jobs, security, climate change or food production - access to sustainable energy is essential for strengthening economies, protecting ecosystems, reducing poverty and achieving equity.

According to the United Nations (2011) more than 1.4 billion people worldwide have no access to electricity, and 1 billion more only have intermittent access. Some 2.5 billion people – or 35 per cent of humanity – rely on traditional biomass for cooking and heating.

These numbers show us that there is still much work to be done to ensure a sustainable energy supply. The United Nations designated 2012 as the International Year of [Sustainable Energy for All](#). The targets are ambitious; achieving universal access to modern energy services by 2030; improving energy efficiency by 40% by 2030; and doubling the share of energy generated from renewable sources by 2030.

Vestas contributed to the High Level Group for the International Year of Sustainable Energy for All, which is fully aligned with our purpose – helping customers deliver renewable energy to people, with very low impact on the environment.

Climate change

Climate change poses one of the most serious challenges for mankind. The predicted effects could be both devastating and irreversible. According to the Intergovernmental Panel on Climate Change (IPCC), the effects of climate change will be broad-ranging, affecting water supplies, ecosystems, food availability, health and the economy and devastating coastal regions.

It is crucial that greenhouse gas emissions are limited, and that low carbon energy generation technologies take over. One of the core messages from IEA's 2011 World Energy Outlook 2011 is; "Delaying action to reduce emissions is a 'false economy' - for every \$1 of investment avoided in the power sector before 2020 an additional \$4.3 would need to be spent after 2020 to compensate for the increased emissions."

Even though wind energy's lifecycle carbon footprint is extremely low when compared to other sources such as oil and gas, we continuously work to reduce the carbon footprint of wind energy. Our goal is to make our turbines at least 15 per cent more carbon efficient emitting only 6 grams of CO₂ per KWh during their [lifetimes](#).

Fossil fuel based power generation causes poor air quality, contributes to global climate change and consumes significant amounts of water. As water becomes scarcer in many regions (a tendency to be amplified by climate change), existing water supplies will not be sufficient in many countries to support the installation of new [water-intensive](#) power plants – putting economic growth at risk.

To mitigate climate change, power generation must globally become low

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Related pages

[Sustainability data](#)
[GRI index](#)
[Contact us/Feedback](#)

carbon, and wherever water locally is or is expected to become scarce, power generation must become low water. During operation, wind power plants do not consume water nor do they emit climate changing greenhouse gases. Wind power is among the solutions to the challenges our world is facing today.

Stakeholder engagement

Managing sustainability

[Organising sustainability](#)
[Key impacts, risks and opportunities](#)

Stakeholder engagement

[Material issues](#)
[Management systems](#)
[Suppliers](#)
[Commitments and policies](#)
[Sustainable products](#)
[Safety](#)
[Environment](#)
[Employees](#)
[Reporting](#)

As a global company Vestas has many stakeholders who are interested in our sustainability performance.

We understand that our sustainability performance is an important determinant of our relationship with stakeholders. We proactively engage with stakeholders to understand their needs and concerns, and in return ensure we address these in our decision making process.

Transparency is a fundamental concept in our engagement strategy and this underpins our different engagement efforts. We publicly disclose key sustainability information in our annual report and on Vestas.com whilst also entering into more detailed dialogues with key stakeholders. Besides being best practice, this is an integral part of a strategic approach to stakeholder engagement as outlined in the [UN Global Compact LEAD blue print](#).

We actively collaborate with stakeholders to positively influence not only our own sustainability performance but also that of the wider communities we operate in. For example Vestas took a leading role in the Global Wind Organisation, developing a standard for Basic Safety Training within the framework of the organisation. We also co-founded [WindMade](#), an initiative leading to the first global consumer label identifying products and companies made with wind energy. This was done together with other global players like [WWF](#) and [Bloomberg](#).

Vestas, at the Group level, has both categorised and prioritised stakeholders in an effort to rationalise and focus engagement efforts. Initially stakeholders are categorised based on their relationship with Vestas, for example, customers, NGOs and policy makers. Subsequently each stakeholder is considered in the context of a number of criteria to determine how relevant Vestas' sustainability performance is to them and conversely how important they are to Vestas' sustainability performance. Engagement can range from forming active partnerships to address common sustainability issues to a more passive engagement through, for example, the publication of the annual report. The priority given to a stakeholder is used to determine the most appropriate approach to engagement.

Our ambition to build closer partnerships and support our stakeholders is reflected in Vestas' [materiality analysis](#).

Our main stakeholder groups

At Vestas' we have many different stakeholder groups with whom we interact. They include customers, shareholders, employees, politicians, suppliers and sub-suppliers, non-governmental organisations, communities and the media.

1. Customers

We prioritise customers as our number one stakeholder group, and to ensure an open and honest dialogue we have implemented a [Customer Loyalty survey](#). The Sustainability department is working with customers on an on-going basis to address sustainability issues.

2. Shareholders

Transparency is at the heart of our outreach to the investment community. The stock market experts look at Social, Economic, Environmental and Health & Safety initiatives to rate listed industrial companies.

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Related pages

[Sustainability data](#)
[GRI index](#)
[Contact us/Feedback](#)

3. Employees

Employees are Vestas' most important asset and we have a range of offerings aimed at them to ensure continuous learning and development as well as [competitive benefits](#).

We reach out to employees through different channels to ensure that they are engaged and committed to Sustainability issues. One channel is Vestas' Safety Walks. A Safety Walk is an opportunity for managers in production, service or administration to discuss safe behavior and ways of improving safety with employees in their actual job function. We also use our Employee Survey to measure the employees' perception of their working environment. The survey is followed up by the drafting of action plans in all departments in order to act on the feedback we receive.

To ensure that employees can report malpractice or ask questions they may need an answer to if faced with ethical dilemmas at work; a Whistle-blower system, named EthicsLine is available. Except where specifically prohibited by local law anyone filing a report may remain anonymous.

4. Politicians

At Vestas, we work closely with political stakeholders to [drive the market](#) for clean, renewable wind energy.

We hold regular discussions with political leaders, public servants, interest groups and non-governmental organizations all over the world. We offer advice and information to the public about the potential of wind power, both in individual markets and worldwide. During 2012 Vestas engaged with policy makers in the USA, Canada, Australia, China, Japan, Spain, the UK, South Africa, Kenya and numerous other countries, advocating reforms and providing best practice experience.

5. Communities

Vestas has developed Community Development Guidelines, including a toolbox, which can be used where Vestas makes social investments.

In India, Vestas has been engaging in social initiatives since 2007. The initiatives are built upon a local 'Societal Policy' and the three focus areas for investment Education, Environment, and Health. In 2011, Vestas conducted a review of all social programs in India to assess their strategic and developmental impact, with the main objective of sharpening the approach towards better strategic community investment. The review led to an action plan with the main highlights of revising the strategy behind social initiatives and improving the integration of core business competencies and impacts in the design of community investments.

Reviewing social risks in emerging markets came onto the agenda in 2012 as Vestas developed a social and environmental due diligence process for turnkey projects in emerging markets. Identifying social and environmental risks to communities during the sales process and while planning major wind farms is an essential step in ensuring that Vestas and its business partners respect the human rights of these important stakeholders.

Material issues

Managing sustainability

[Organising sustainability](#)
[Key impacts, risks and opportunities](#)
[Stakeholder engagement](#)
[Material issues](#)
[Management systems](#)
[Suppliers](#)
[Commitments and policies](#)
[Sustainable products](#)
[Safety](#)
[Environment](#)
[Employees](#)
[Reporting](#)

Understanding our stakeholders' opinions and priorities enables us to make better decisions and ensure that we are both a successful company and a responsible member of the community. We have therefore engaged with internal and external stakeholders to define what matters most to them and in doing so have identified what the material sustainability issues are for Vestas.

A materiality analysis is mapping topics and indicators that reflect the organization's significant economic, environmental, and social impacts. By identifying material issues we can focus our sustainability related programs on the areas that are most important to Vestas and our stakeholders. The materiality analysis also influences how we report on sustainability issues, for example we comment on the most material issues in the annual report and provide additional information on Vestas.com and updates.

The formal identification of material issues was performed in 2011 through an internal stakeholder consultation involving many parts of the organization. To prioritise issues we used internal knowledge of stakeholder expectations, Vestas surveys, external stakeholder sustainability reports, consultant input and global sustainability studies to establish the relevance of issues to them.

In 2012 we enhanced the materiality analysis by consulting directly with external stakeholders such as customers and investors. Doing so gave us additional insight into their priorities and provided a useful platform for meaningful dialogue.

The Vestas materiality analysis has identified a range of sustainability issues. Amongst these are Health & Safety, Business Performance, Climate Change, Quality & Reliability, Product Environmental Performance and Community Impact are understood to be some of the most important sustainability issues.

This work is part of our sustainability stakeholder engagement [framework](#).


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Related pages

[»> Sustainability data](#)
[»> GRI index](#)
[»> Contact us/Feedback](#)

Management Systems

Managing sustainability

Organising sustainability

Key impacts, risks and opportunities

Stakeholder engagement

Material issues

Management systems

Suppliers

Commitments and policies

Sustainable products

Safety

Environment

Employees

Reporting

At Vestas, all employees must work according to Management Standards for the Environment and Occupational Health and Safety.

To support this strive, Environmental Management is certified in accordance with the requirements of ISO 14001, Health & Safety Management in accordance with OHSAS 18001, and the Quality Management System in line with ISO 9001.

The Sustainability Management System, covering Health, Safety, Environment, Security and CSR, serves to put all external and internal Vestas Sustainability requirements systematically, efficient and effectively into practice. It is Vestas' intent to make Sustainability an integral component of all business processes that create the products and services of the organization.

In order to ensure continual improvements for Sustainability performance in each area, our daily working practices are governed processes and supported by various tools – including databases, IT systems and catalogues of ideas.

To give an example, in order to enhance communication we insist on regular internal reporting on all significant Sustainability incidents through various channels. This helps us identify and investigate the most relevant issues to be addressed. The solutions implemented to these issues help improve the overall Vestas Sustainability performance throughout the organisation continuously.

Vestas is currently in the process of updating and aligning our Sustainability Management System to ensure that all processes are unified throughout the organisation.

As part of Vestas' strive for continual improvements, its process of assessing risks and opportunities has been enhanced to accommodate a growing demand for alignment across areas of Sustainability. The updated process ensures that all sustainability related risks and opportunities are systematically and effectively identified, quantified, mitigated and monitored in an aligned way throughout the organization. The scope of the process is to include the identification and assessment of significant Environmental Aspects, Health and safety Hazards and Corporate Social Responsibility Impacts and Security Threats.

Certificates

Vestas is fully covered by an umbrella certificate for the management system standards OHSAS 18001, ISO 14001 and ISO 9001. Vestas aims for all new sites/location of a certain size to be visited by the External Certification Body within six months.

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Related pages

[»>Sustainability data](#)

[»>GRI index](#)

[»>Contact us/Feedback](#)

Suppliers

Managing sustainability

- Organising sustainability
- Key impacts, risks and opportunities
- Stakeholder engagement
- Material issues
- Management systems

Suppliers

- Commitments and policies
- Sustainable products
- Safety
- Environment
- Employees
- Reporting

Vestas' business partners play an important role for Vestas in order for us to meet our goals – with regard to both sustainability as well as fulfilling the aspiration for wind energy to be beneficial for society as a whole.

In order to improve the sustainability of the products, Vestas has to work closely with sub-suppliers of components and raw materials, which today account for more than 80 per cent of the energy consumed in the product manufacturing process.

In order to ensure the health and safety of all persons involved, for example when a turbine is erected, customers and sub-suppliers must be both aware of – and follow – the Vestas safety rules and procedures.

In addition to this area of Vestas' work with sustainability and business partners, Vestas has prepared a [Code of Conduct](#) in accordance with the [UN Global Compact](#), the International Bill of Human Rights and the International Labour Organization conventions. Vestas works actively to ensure that partners also respect the Code of Conduct, and, to the greatest extent possible, will prioritise working with business partners who are dedicated to and support Vestas' view on sustainability, with particular emphasis on the following:


- ❑ ensuring that work is carried out safely – the first priority in any situation
- ❑ respecting the freedom of association and the right to collective bargaining with respect to legislation in the country the business partner operates in
- ❑ eliminating all forms of forced labour
- ❑ eliminating all forms of corruption
- ❑ eliminating child labour
- ❑ eliminating all forms of work-related discrimination
- ❑ protecting the environment

A wind turbine consists of several thousand components each with its own sub-suppliers. Thus, Vestas' supply chain is complex. Vestas Business Units have their own procurement functions, which are responsible for handling their respective business partners. In total, there are several thousand partners worldwide.

Responsible Supplier Management

Vestas is devoted to the principle of Responsible Supplier Management.

All purchase agreements presented to our suppliers today therefore include our policies regarding human rights and environment, as well as a commitment to work with our suppliers on initiatives relating to sustainability going forward. Making Vestas' commitment to sustainability visible to our suppliers, also in the contracts we enter into with them, is driven by a number of stakeholders across


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Related pages

- » [Sustainability data](#)
- » [GRI index](#)
- » [Contact us/Feedback](#)

Vestas. These stakeholders are the corporate Sustainability department defining the policies, the Legal departments drafting specific wording, Category Management/Procurement teams agreeing on these with suppliers as well as Supplier Quality and Development Teams monitoring progress.

With 95 per cent of our signed purchase agreements based on Vestas templates, and with all of these including either directly or by reference the above principles, we believe we are well on the way.

Vestas also takes action to ensure that suppliers comply with our policies. That's done through our manufacturing units, who are using the responsible supplier management system. They screen significant suppliers also on sustainability issues, including human rights and labour standards.

When so-called red flags are identified – that is when suppliers are not living up to the Vestas standards - the suppliers are requested to take corrective action.

As part of this system the production business units use the responsible supplier management assessment tool. In 2012, 98 suppliers were assessed in 27 countries and 71 were approved.

Commitments and policies

Managing sustainability

[Commitments and policies](#)

[Code of Conduct and EthicsLine](#)

[UN Global Compact](#)

[Partnership Against Corruption Initiative](#)

[Sustainability policies](#)

[Memberships](#)

[Sustainable products](#)

[Safety](#)

[Environment](#)

[Employees](#)

[Reporting](#)

Vestas is committed to an array of global initiatives, such as the United Nations Global Compact LEAD and World Economic forums Partnering Against Corruption Initiative. These commitments support our intent to power Sustainability, both within the organization and beyond.

We support our global operations and employees through an expanding set of sustainability policies. Most recently, policies on human rights and freedom of association have been embedded to enforce human rights practices and ethical behaviour in the business, especially when entering emerging markets.

Learn more about how Vestas work with other areas such as [safety performance](#) and [environmental performance](#) and read more about Vestas and our efforts within:

- [UN Global Compact LEAD](#)
- [Partnering against corruption initiative](#)
- [Sustainable Energy for ALL](#)
- [Political Affairs](#)

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[i Related pages](#)

- [>> Sustainability data](#)
- [>> GRI index](#)
- [>> Contact us/Feedback](#)

Code of Conduct and EthicsLine

Managing sustainability

Commitments and policies

[Code of Conduct and EthicsLine](#)

UN Global Compact

Partnership Against Corruption Initiative

Sustainability policies

Memberships

Sustainable products

Safety

Environment

Employees

Reporting

As a global company with more than 90 different nationalities employed, a wide range of cultures, religious beliefs and political views are present. This calls for commonly agreed ethical practices and standards.

The Vestas Code of Conduct is the guiding ethical document outlining Vestas global commitment and expectations to people, environment, sustainable goals and our business partners. In this respect it sets out clearly what is expected and what is acceptable behaviour from employees and people acting on behalf of Vestas.

Vestas aims to ensure a high degree of business integrity and compliance with the code already from the first day on the job. All new employees are being introduced to the Vestas Code of Conduct as part of their induction. They also take part in compulsory e-learning, some of which is tailored to their particular job role.

To anchor the values and principles in the organisation, commitment from top management is mandatory. Acknowledgement of the Vestas Code of Conduct was carried out for the first time in 2011 for top management (Vice President level and above). The acknowledgement is an annual activity where employees confirm that they have read and understood Vestas Code of Conduct and that they are not aware of any unaddressed violations of Vestas Code of Conduct. Acknowledgement is expected as part of our commitment to UN Global Compact and the commitment to the World Economic Forum's Partnering Against Corruption Initiative.

In addition, all employees are being informed of Vestas' EthicsLine which can be used for reporting violation of company policies and for seeking guidance when faced with an ethical dilemma.

[Vestas Code of Conduct](#)

EthicsLine

Vestas' whistle-blower system EthicsLine was introduced in 2007. Vestas is committed to securing an ethical environment in our company, and Vestas EthicsLine has been established to ensure that inappropriate behavior or incidents are brought forward and handled.

The purpose of the EthicsLine is first to ensure that Vestas employees, business partners or anyone associated with Vestas have a place to report any inappropriate behavior or practices which may be experienced within the Vestas workplace. Secondly, the EthicsLine provides guidance when in doubt about ethical issues.

Vestas EthicsLine can be used to:

- ❑ report malpractice that has been observed or is suspected;
- ❑ ask questions about Vestas policies, or difficult issues of behaviour or ethics, when the answers cannot be found elsewhere

Vestas EthicsLine is operated by an independent company. Except where specifically prohibited by local law, anyone using Vestas EthicsLine may remain anonymous. Subject to applicable laws, all matters reported through Vestas

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 [Related pages](#)

[»> Sustainability data](#)

[»> GRI index](#)

[»> Contact us/Feedback](#)

EthicsLine will be investigated. Everyone involved will be treated fairly. Vestas will not tolerate retaliation against anyone who files a report in good faith, regardless of whether or not the claim can be substantiated.

[Vestas EthicsLine](#)

United Nations Global Compact

Managing sustainability

Commitments and policies

[Code of Conduct and EthicsLine](#)

[UN Global Compact](#)

[Partnership Against Corruption Initiative](#)

[Sustainability policies](#)

[Memberships](#)

[Sustainable products](#)

[Safety](#)

[Environment](#)

[Employees](#)

[Reporting](#)



 [Share](#) |

 **Related pages**

[»>Sustainability data](#)

[»>GRI index](#)

[»>Contact us/Feedback](#)

[United Nations Global Compact LEAD > »](#)

[Engaging with UN Global Compact > »](#)

[Caring For Climate > »](#)

[Local Networks > »](#)

[Sustainable Energy for All > »](#)

At Vestas, we committed ourselves to the United Nations Global Compact in 2009. We identify business ethics as vital for both our sustainability focus and ultimate business success as it aids to build competitive advantage by being a preferred partner for ethically-conscious customers.

The United Nations Global Compact is a strategic policy initiative for businesses that are committed to aligning their operations and strategies with ten universally accepted principles in the areas of human rights, labour, environment and anti-corruption.

With the participation in United Nations Global Compact Vestas commits to report and publish its progress on implementing these principles in the organisation on an annual basis. The implementation of these requirements in the organisation is an integral part of the [Vestas Sustainability Management System](#).

[United Nations Global Compact LEAD > »](#)

In January 2011, Vestas joined a group of 56 companies in the LEAD Initiative, a new platform within the United Nations Global Compact launched to gather companies willing to take sustainability to the next level.

LEAD sets an ambitious goal for its participants, which include industry leaders from all over the world. They are expected to be role models in setting a higher standard for corporate sustainability, through an enhanced commitment to advance their social, environmental and governance performance.

LEAD companies are expected to share their experience and knowledge across

the United Nations Global Compact networks around the world and commit to advanced reporting of their activities and performance, in order to achieve impactful results on today's and tomorrow's sustainability challenges. This is achieved through a new model developed by the United Nations Global Compact, the Blueprint for Corporate Sustainability Leadership, which spells out in detail the steps and actions requested to fulfill this objective.

[Engaging with UN Global Compact > »](#)

We are proud to participate in a broad variety of sustainability initiatives to improve our own performance and also, hopefully, inspire others to take an active part in a sustainable development.

Vestas participates in the UN Global Compact Human Rights Working Group.

[Caring For Climate > »](#)

Vestas is participating in the Caring for Climate initiative under the United Nations Global Compact. Caring for Climate is aimed at advancing the role of business in addressing climate change. It's done through a commitment by businesses who pledge to take action and a call to governments, incorporating transparency on their environmental strategies.

[Local Networks > »](#)

At Vestas we have made an effort to demonstrate our sustainability leadership locally by joining the United Nations Global Compact Local Networks including, the Indian, Nordic and Singaporean networks. Vestas considers this as an opportunity to promote stronger sustainability efforts for businesses in their local context.

Nordic Network

In the buildup to Rio+20 Vestas collaborated with a number of other members from the Nordic Network to put forwards 3 recommendations to the Global Compact Corporate Sustainability Forum and international community. These were:

- ❑ Establish an international Energy Maturity Rating for countries. This would aim to measure their capacity and capabilities to attract private sector investments in the energy sector and in energy efficient production of services and goods.
- ❑ Establish a common platform that facilitates formation of strategic public private partnerships scaling up of, or co-investments in developing countries in areas such as energy access, efficiency and renewable energy.
- ❑ Agree on Sustainable Development Goals for Energy Access, that encourages innovation within the energy sector, low-carbon development solutions, high energy efficiency, and innovative investment regimes.

India

The local network was founded in 2003 in New Delhi, and is one of the largest in the world, focusing on promoting awareness, supporting social and rural development and engaging in research and events. Vestas India enrolled as a member of Global Compact Network in India in 2011, and has taken leadership in 'Transparency in Ethical Business for Profitability' along with the UN Global Compact office.

[Sustainable Energy for All > »](#)

In 2011 the UN Secretary General set out his Vision for Sustainable Energy for All. The vision is centered on three goals to be achieved by 2030, these are:

- ❑ Ensuring universal access to modern energy services
- ❑ Doubling the rate of improvement in energy efficiency

- Doubling the share of renewable energy in the global energy mix

The vision was endorsed by the UN General Assembly and as a result 2012 became the year of sustainable energy for all. To mobilise action towards these goals a High Level Group was convened by the UN Secretary General and Vestas was invited to join this group.

In 2012 the High Level Group worked to gather support for “Sustainable Energy for All” and focus efforts across a number of action areas. To this end, hundreds of actions and commitments from organisations were initiated. Businesses and investors have committed over USD \$50 billion and some 50 Governments have become involved. As a result more than a billion people will benefit from Sustainable Energy for All's public and private sector commitments.

At Rio+20 Vestas reiterated its commitment to SE4ALL both in terms of core business (developing, producing, installing and maintaining wind power plants) and additionally by supporting demand for renewable energy. Vestas' supports demand for renewable energy in two ways, firstly through our own procurement and investment in renewable energy (see [renewable energy targets](#)) and secondly by supporting others in their own renewable energy procurement and investment (see [WindMade](#) and the [Transparency Agenda](#)).

You can follow the progress of the initiative on www.sustainableenergyforall.org

Partnership Against Corruption Initiative

Managing sustainability

Commitments and policies

[Code of Conduct and EthicsLine](#)

[UN Global Compact](#)

[Partnership Against Corruption Initiative](#)

[Sustainability policies](#)

[Memberships](#)

Sustainable products

Safety

Environment

Employees

Reporting

Since 2010, Vestas has been a signatory to the Partnering Against Corruption Initiative (PACI). PACI is a business driven global anti-corruption initiative within the World Economic Forum. The signatories to PACI firmly believe that corruption cannot be countered without leadership and commitment from the top management.

While the United Nations Global Compact offers a principles-based approach to fighting corruption, based on its 10th principle, PACI offers an implementation framework, developed by companies for companies - the UN Global Compact recognizes PACI as a means of implementing its 10th principle.

In addition to providing a framework for the design and implementation of effective policies and systems to prevent, detect and address corruption, PACI also offers a platform to help companies benchmark internal practices against global best practice through peer exchange and learning and level the playing field through collective action with other companies, governments and civil society.

Vestas Code of Conduct set forth a zero tolerance policy towards any form of bribery which is required under the PACI principles.

Since becoming a signatory to PACI, Vestas has developed further supporting guidelines and procedures to implement the PACI principles and will continue these efforts during the coming years. In particular, Vestas has developed an anti-corruption due diligence program for its business partners. This is currently being implemented throughout Vestas.

As part of Vestas' anti-corruption initiatives and as part of the Code of Conduct, Vestas has established a process for registering gifts, entertainment and hospitality. All Vestas employees are obliged to register gifts, entertainment and hospitality when certain criteria are met. Approval from a manager or executive is needed when the value of the received gift, entertainment or hospitality reaches a certain level. A more stringent procedure for gifts, entertainment and hospitality towards government officials has been developed but not yet fully implemented.

To enhance awareness of the Code of Conduct and to track compliance, all employees at IPE Level 57+ (Director/Senior Specialist/Senior Project Manager and above) must acknowledge on an annual basis that they understand the Code of Conduct and are not aware of any unaddressed violations of the Code of Conduct.

All new employees are being introduced to the Vestas Code of Conduct as part of their induction. They also take part in compulsory e-learning, some of which is tailored for particular job roles. Examples of specialized e-learning subjects are: 'Recognising Conflicts of Interest', 'Gifts, Entertainment & Hospitality', 'Global Bribery and Corruption'. These three e-learning are available in 5 languages (9 languages for Gifts, Entertainment & Hospitality).'

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 [Related pages](#)

[»>Sustainability data](#)

[»>GRI index](#)

[»>Contact us/Feedback](#)

E-learning in anti-corruption

<i>Number of employees completed training</i>	
Course	Total
Gifts, Entertainment & Hospitality	2429
Recognising Conflicts of Interest	1600
Global Bribery and Corruption	2594
UK Bribery Act	201

Sustainability policies

Managing sustainability

[Commitments and policies](#)

[Code of Conduct and EthicsLine](#)

[UN Global Compact](#)

[Partnership Against Corruption Initiative](#)

[Sustainability policies](#)

[Memberships](#)

[Sustainable products](#)

[Safety](#)

[Environment](#)

[Employees](#)

[Reporting](#)

At Vestas, we work to promote policies and principles that express the company and senior management's intention and direction on how to [manage](#) and regulate our main sustainability areas. Our sustainability policies guide our business decisions and processes to achieve our vision. The policies and principles are of global applicability throughout the organisation.

The [Health & Safety and Environmental policy](#) outlines Vestas' approach to achieve the objectives and targets in relation to our mantra; [Safety First](#) as well as the environmental impact of Vestas' activities.

Vestas has developed policies summarising the approach to human rights and labour. The policies are the main instrument for Vestas to implement our commitments to respect [human rights](#) and [labour](#) standards, according to our support to the [UN Global Compact](#).

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Memberships

Managing sustainability


Vestas has joined a number of sustainability groups to create a global network and increase stakeholder awareness of the company's commitment to sustainability.


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[Safety](#)

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[Environment](#)
[Employees](#)
[Reporting](#)

Sustainable products

[Managing sustainability](#)
[Commitments and policies](#)
[Sustainable products](#)
[Product responsibility](#)
[Life Cycle Assessment](#)
[Environmental and social impact assessments](#)
[Product development](#)
[Safety](#)
[Environment](#)
[Employees](#)
[Reporting](#)

Vestas is committed to reducing our impact on the environment by cutting the emissions of greenhouse gasses. As a company, we aim to decrease the overall use of energy, increase our use of renewable energy and use less carbon intensive energy forms.

Carbon footprint

By 2015, Vestas' aim is that turbines will be at least 15 per cent more efficient, emitting only 6 grams of CO₂ per kWh during their lifetimes. Today, Vestas contributes approximately 7 per cent of the total CO₂ emission for the V112-3.0 MW turbine. Of the remaining amount, approximately 85-90 per cent is contributed by material and component suppliers, and 4-10 per cent is for transport of materials and components for construction, decommissioning and recycling.

One of the main components in reducing the carbon footprint of the turbine is to reduce the impact of SF₆. SF₆ is a potent greenhouse gas used to rapidly quench electric discharges in the switchgear and thereby preventing fires and electrical hazards.

Vestas uses SF₆ as this property makes it possible to significantly reduce the size of the switchgear, at high voltage solutions - something that other alternatives as air or dry nitrogen cannot do.

The downside of using SF₆ is that SF₆ is a significant greenhouse gas. 1 kilo of SF₆ has the same global warming effect as 22.800 kilo of CO₂. On average, there is 7 kg SF₆ in the switchgear of a turbine. If emitted to the atmosphere, it equals 10 per cent of the CO₂-eq emitted during the entire life cycle of the turbine, from mining, through production, operation and decommissioning of the entire wind power plant. 10 per cent roughly compares to the entire transport carried out in the life cycle of a wind power plant.

Vestas will take actions to control the emission of SF₆ and look at future opportunities to phase out SF₆, in order to minimize the effect on climate change. A take back scheme for switchgears containing SF₆ is in place to return and recycle the SF₆ from worn-out switch gears, in the best possible way and to reduce any emission during operation and when the turbine reaches end of life. Besides the take back scheme, Vestas needs to make significant energy reductions in production development, in our factories and within the supply chain to reach the target of only 6 grams of CO₂ per kWh delivered to the grid.

Recyclability

Vestas abides by a strict definition of recyclability. When recycled, both the value and the essential properties of the materials must be preserved. By this definition, 80 per cent of Vestas V112.3.0 MW can be usefully recycled at the end of its lifetime. Because Vestas believes that a sustainable product should leave the smallest possible environmental footprint when decommissioned, it


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[»>GRI index](#)
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aims to increase the recyclability of its turbines from 80 to 85 per cent by 2015.

Vestas is working proactively on initiatives to improve the recyclability of its turbines. These range from recycling research, for instance research on how to recycle glass and carbon fibres, to the full recycling of test nacelles.

Product responsibility

[Managing sustainability](#)
[Commitments and policies](#)
[Sustainable products](#)
[Product responsibility](#)
[Life Cycle Assessment](#)
[Environmental and social impact assessments](#)
[Product development](#)
[Safety](#)
[Environment](#)
[Employees](#)
[Reporting](#)

Vestas' wind turbines, options and service offerings are the result of not only a thorough development process but also comprehensive analysis of market forecasts. The top-level Vestas process which allows us to fulfill our customer requests is known as the Vestas product market strategy. The product market strategy is the result of a complex series of analyses including market forecasts, customer trends, competition, technical predictions and grid requirements. Macro-economic factors such as national government targets for renewable energy are also studied. Based on this input, a series of strategic decisions are made regarding which products, technologies, configurations and service offerings to make available in which markets and when. By involving relevant stakeholders in the development process, requirements can be built into the design of the products at an early stage.

When designing our products, requirements in regards to Sustainability are taken into consideration. That's ensured through Vestas development process, the Vestas Way to Market.

Vestas Way to Market

To ensure a true integrated development process across the Vestas organisation enabling us to reach our overall business targets, a first version of Vestas Way to Market was launched in 2008. The process was refined and updated in 2011.

Vestas Way to Market is Vestas' global framework for planning, managing and executing technology and product development projects and actively involving the whole value chain in our company. As such, we strive to ensure that these projects start and end with customer requirements in focus.

The core of Vestas Way to Market is the stage-gate process consisting of seven stages and seven gates with a group of gatekeepers at each stage. The gatekeepers decide whether to let the project move on to next stage, whether to rethink some aspects or stop the project. This process ensures, amongst other things, that the specification requirements are met. The specifications are based on internal Vestas commitments such as Vestas' chemical black list, international legislation such as the European directives, and international recognised codes and standards such as the ASMA, ISO and IEC.

In order to ensure regulatory compliance, it's our ambition to share knowledge of how regulatory requirements, incl. transportation and HSE requirements and grid codes requirements as well as standards and certification should be complied with in the respective departments in Vestas. The purpose is to strengthen Vestas' product regulatory compliance to ensure market access.

It is vital to identify business risks early in the development process in order to ensure that the project will not have a negative impact on Vestas' business and strategy, reputation etc. as well on our customers' business. Risk management is a continuous process throughout the entire project, and a business risk overview is presented and reviewed at each gate meeting. It is the project manager's responsibility to identify and assess key risks and present mitigation actions. The risk analysis must include input regarding health and safety aspects, product and commercial issues, process risk analyses as well as an investigation into the IPR issues.

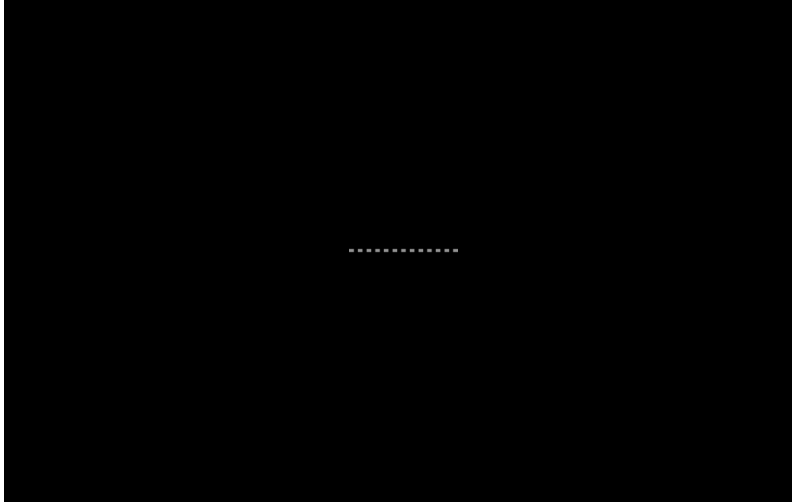
Continuous Improvement


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Part of Vestas' business approach is to constantly develop new and better technical solutions that can improve the performance of our current operating fleet or the safety connected to operating the products.

Use of new technical solutions will very often have a positive influence on the Lost Production Factor (LPF) for a given wind farm. The LPF is the share of the potential energy from the wind not harvested by the turbines. The LPF has been substantially reduced in recent years. The average LPF has dropped to below 2 percent in 2012.



Life Cycle Assessment

[Managing sustainability](#)
[Commitments and policies](#)
[Sustainable products](#)
[Product responsibility](#)
[Life Cycle Assessment](#)
[Assessments stages](#)
[Comparing energy payback](#)
[Value chain integration](#)
[Rare Earth Elements](#)
[Available Life Cycle](#)
[Assessments](#)
[Environmental and social impact assessments](#)
[Product development](#)
[Safety](#)
[Environment](#)
[Employees](#)
[Reporting](#)

Did you know that a single Vestas wind turbine can generate more than 25 times the energy to society than it uses in its entire lifecycle? And that a single Vestas wind turbine only emits 1 percent of CO₂ when compared to a coal power plant in its lifecycle?

Equipped with extensive facts on its wind turbines environmental performance Vestas will carry on bringing forward the facts of wind, to enable [businesses](#) and [consumers](#) to make an informed choice.

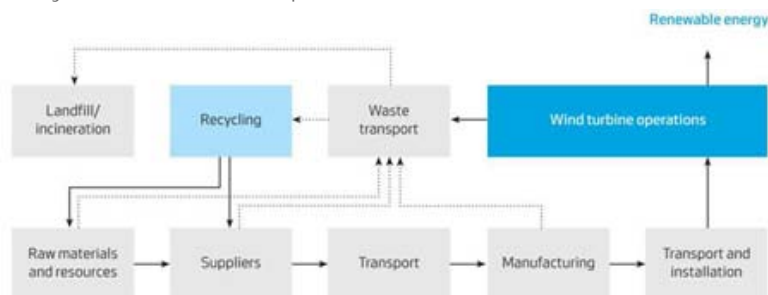
Vestas strives to continually improve people's lives through having a responsible interaction with the environment, respect for society and a productive economy. To make that goal a reality Vestas works with Life Cycle Assessments to develop increasingly energy-efficient products and production whilst ensuring to mitigate the environmental impacts.

Transparency, in all instances, and especially in regards to the environmental impacts and benefits are vital to affirm Vestas' products as financially competitive and when stating the Cost of Energy. Since 1999 Vestas has been developing Life Cycle Assessments of wind power to give a 'cradle to grave' evaluation of the environmental impacts of Vestas' products and activities. These concentrate on two key factors:

- Document the environmental performance of Vestas wind turbines
- Analyse the results to improve or develop wind turbines with less environmental impact

The studies assess a wind turbine's entire bill-of-materials accounting for around 25,000 parts that make up a wind turbine. In a Life Cycle Assessment a complete wind power plant is assessed up to the point of the electricity grid, including the wind turbine itself, foundation, site cabling that connects the wind turbines together and other site parts, such as the transformer station.

Life Cycle Assessment scope



Customer business case

Vestas offers customers the opportunity to acquire a customised Life Cycle Assessment of their own wind power plant. This takes into consideration the wind turbine type, specific site conditions and the complete production supply chain.

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Being equipped with transparent environmental facts of your own wind power plant performance gives customers and authorities greater business case certainty by informing the energy strategy and environmental case, while simultaneously supporting the planning/permitting process through fact-based disclosure.

The Customer-LCAs are based on state-of-the-art analysis of wind power developed by Vestas' own experts and externally critically reviewed by an independent expert in the field. The LCA is scalable and provides customers the opportunity, at an early stage in the wind plant project, to understand the specific environmental performance of their wind power plant for successful communication and accountability.

Assessments stages

- Managing sustainability
- Commitments and policies
- Sustainable products
 - Product responsibility
 - Life Cycle Assessment
 - Assessments stages
 - Comparing energy payback
 - Value chain integration
 - Rare Earth Elements
 - Available Life Cycle Assessments
- Environmental and social impact assessments
- Product development
- Safety
- Environment
- Employees
- Reporting

Assessments stages

All environmentally relevant flows of energy and materials are accounted for in a Life Cycle Assessment (e.g. inputs of electricity, fuels, material resources, and output wastes and emissions to air, water and land). These flows are assessed for all the components and processes that make the entire wind power plant and summarised across the complete life cycle.

The life cycle of the wind power plant is modelled in the Life Cycle Assessment using a modular approach corresponding to the life cycle stages shown in the figure below. This allows the various life cycle stages and various components of the wind power plant to be analysed individually.

Benchmark performance

Vestas' wind turbines are designed to meet different functional requirements for both onshore and offshore environments, as well as the wind class for which they are designed to operate. The wind class determines which turbine is suitable for a particular site, and influences the total electricity output of the [wind power plant](#).

When benchmarking an array of wind turbine's performance it is important that it's done on an equivalent functional basis, so they can be compared within similar wind classes. There are three wind classes for wind turbines which are defined by an International Electrotechnical Commission standard (IEC), corresponding to high, medium and low wind.

The various Vestas wind turbines have been designed to operate under high, medium or low wind conditions. For each study the specific wind conditions have been selected to evaluate the turbines environmental performance.

In order to assure the rigour of Vestas Life Cycle Assessments and the robustness of the results, all Life Cycle Assessments are conducted in accordance with the ISO standards (ISO 14040/44) for Life Cycle Assessment. Each study has undergone an independent critical review by an expert in the field.

Life Cycle Assessment stages


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Comparing energy payback

- Managing sustainability
- Commitments and policies
- Sustainable products
 - Product responsibility
 - Life Cycle Assessment
 - Assessments stages
 - Comparing energy payback
 - Value chain integration
 - Rare Earth Elements
 - Available Life Cycle Assessments
- Environmental and social impact assessments
- Product development
- Safety
- Environment
- Employees
- Reporting

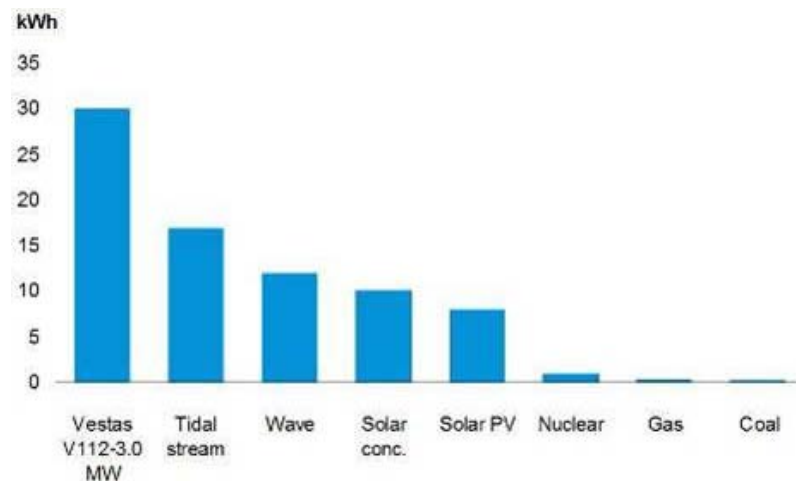
Comparing energy payback

The long-term impact on the environment for a wind turbine's life cycle of 20 years is minimal when compared to that from average European electricity production by other means.

The energy balance of a wind power plant will show the relationship between the energy requirement over the whole life cycle of the power plant (i.e. to manufacture, operate, service and dispose) versus the energy generated by the wind power plant. This energy payback period is measured in months, where the energy requirement for the life cycle of the power plant equals the energy it has produced.

For wind turbines the breakeven time of for instance a V80-2.0MW wind power plant is 8.6 months for low wind conditions. Over the life cycle of a V80-2.0MW wind power plant it will return 28 times more energy back to society than it consumed over its life cycle. So when 1 kWh is invested in a wind energy solution you get 28 kWh in return. Whereas if you invest 1kWh in coal you typically get 0.28 kWh in return¹.

Comparing energy payback by sources^{2,3}



Sources:

¹World Coal Association. Coal & the Environment - Coal Use & the Environment - [Improving Efficiencies](#).

²The Offshore Valuation: A valuation of the UK's offshore renewable energy resource. Published in the United Kingdom 2010 by the Public Interest Research Centre. ISBN 978-0-9503648-8-9 www.offshorevaluation.org PE (2006).

³PE International - GaBi 4 dataset documentation for the software-system and databases, LBP, University of Stuttgart and PE INTERNATIONAL GmbH

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Value chain integration

[Managing sustainability](#)
[Commitments and policies](#)
[Sustainable products](#)
[Product responsibility](#)
[Life Cycle Assessment](#)
[Assessments stages](#)
[Comparing energy payback](#)
[Value chain integration](#)
[Rare Earth Elements](#)
[Available Life Cycle Assessments](#)
[Environmental and social impact assessments](#)
[Product development](#)
[Safety](#)
[Environment](#)
[Employees](#)
[Reporting](#)

Value chain integration

Our work with Life Cycle Assessments plays a vital role in our ability to map, track and design solutions that will support realisation of Vestas [Sustainability Objectives 2015](#). A part of the effort includes transferring the knowledge obtained through the Life Cycle Assessments into Vestas' value chain and through to our business partners. This is done in order to identify the best available technology for designing, decommissioning and recycling turbines.

Product design

By knowing how Vestas' products and materials contribute to the environmental performance it is possible to conduct fact-based and informed decision making at an early stage in the product design and development phases. Life Cycle Assessments are used to provide knowledge regarding where the environmental 'hot spots' are in the life cycle i.e. from raw material production, through to manufacturing, operation, servicing and plant decommissioning. Vestas is working towards integrating environmental requirements into the design process, through our internal systems, procedures and tools.

End-of-life solutions

Constantly lowering the Cost of Energy for wind and simultaneously the environmental impact of wind power is the focus of end-of-life solutions. Through research and application on how best to recover and recycle the various components and materials in a wind turbine, after its power production ceases, the end-of-life phase enhances the overall environmental performance seen from a lifecycle perspective.

The studies also supplement knowledge on how best to design the next generation of wind turbines from an environmental perspective, as well as, how to gain the most value at end-of-life from both existing turbines and new turbines being developed.

In 2011/12, Vestas carried out a complete dismantling of a wind turbine nacelle to trace additional possibilities for increasing the recyclability rate of Vestas' wind turbines and work actively to achieve its objective of 85 percent recyclability of a wind turbine in 2015, see Vestas [Sustainability Objectives 2015](#).

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Rare Earth Elements

[Managing sustainability](#)
[Commitments and policies](#)
[Sustainable products](#)
[Product responsibility](#)
[Life Cycle Assessment](#)
[Assessments stages](#)
[Comparing energy payback](#)
[Value chain integration](#)
[Rare Earth Elements](#)
[Available Life Cycle Assessments](#)
[Environmental and social impact assessments](#)
[Product development](#)
[Safety](#)
[Environment](#)
[Employees](#)
[Reporting](#)

Rare Earth Elements from a Life Cycle Assessments perspective

Rare earths elements are naturally-occurring elements that, once mined and processed, can be used in a variety of industrial applications, for example, permanent magnets are used in wind turbines, hybrid car motors, components for military hardware and other high-tech applications.

In Vestas, rare earth elements are used in the magnets found in the tower and in the permanent-magnet generators in some of the newer models – the V112-3.0 MW and 2.0 MW GridStreamer™ platform. The rare earths elements are used to improve the performance of turbines by making the generators more efficient and more grid-compatible. This allows Vestas to reduce the size of the generator and therefore use fewer other resources (steel, composite structural materials, etc.) and create a smaller carbon footprint.

Vestas uses approximately 68kg of neodymium in the permanent-magnet generator for a V112- 3.0 MW wind turbine. In addition an amount of around 14kg of neodymium is used in the tower magnet, bringing it to a total of 82kg neodymium used for one V112- 3.0 MW, as well as 7kg dysprosium.

The use of 14kg rare earths elements in the V112-3.0 MW tower magnets (of 84m height) results in a saving of around 10 tonnes steel in the tower per wind turbine. This equates to a saving of around 8.0 tonnes of CO2 equivalents over the entire life cycle - i.e. accounting for the potential environmental impacts of the magnets and steel production, use and end-of-life recycling and disposal.

It is important to understand the difference between different types of turbine designs and how each design uses rare earths elements. There are two types of turbine drive train concepts using rare earth elements: conventional geared drive train and direct-drive (without a gearbox). The amount of rare earths elements used in direct-drive turbines is substantially higher – up to 10 times as much as a generator in a conventional drive train. Today, all Vestas turbines are based on conventional drive trains.

The contribution of rare earth elements (such as neodymium and dysprosium) used in the turbine generator magnets, and also in the magnets used in the tower, make a negligible contribution to total resource depletion, contributing below 0.1% of total life cycle impacts.

Work with supply chain

Vestas acknowledges the environmental impact of the rare earth mining and processing, and strives to minimise the impact as much as possible. All types of mining and processing operations have environmental impacts, but it is up to industry players such as Vestas and our business partners to ensure these are minimised and managed.

Vestas purchases its permanent magnets from reputable worldwide companies who source most of their rare earth elements from China. Currently, China provides the vast majority of the world's rare earth elements supply. Vestas'

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[>GRI index](#)
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suppliers confirm that their raw materials are sourced only from mines which manufacture according to Chinese laws.

Vestas is pursuing alternative rare earth element supplies from other countries, including new rare earth mines already underway in such places as India, Canada, Australia and the USA. We do this in cooperation with our rare earth element magnet supplier partners. A greater diversity of rare earth elements suppliers will lead to more possibilities when choosing a supplier, lower prices and offer greater emphasis on sustainability throughout the value chain.



Available Life Cycle Assessments

Managing sustainability	Onshore	
Commitments and policies		
Sustainable products	Turbine / IEC Wind Class	
Product responsibility	V80-2.0 MW	Yes (2004)
Life Cycle Assessment		
Assessments stages	V80-2.0 MW GridStreamer™	Yes (2011)
Comparing energy payback		
Value chain integration	V90-1.8/2.0 MW	No
Rare Earth Elements		
Available Life Cycle Assessments	V90-1.8/2.0 MW GridStreamer™	Yes (2011)
Environmental and social impact assessments	V100-1.8 MW/V100-2.0 MW	No
Product development		
Safety	V100-2.6 MW	Yes (2012)
Environment		
Employees	V90-3.0 MW	Yes (2012)
Reporting	V112-3.0 MW	Yes (2011)
	V126-3.0 MW™	No
	Offshore	
	Turbine / IEC Wind Class	
	V90-3.0 MW Offshore	Yes (2006)
	V112-3.0 MW Offshore	No
	V164-8.0 MW	No

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Environmental and social impact assessments

[Managing sustainability](#)
[Commitments and policies](#)
[Sustainable products](#)
[Product responsibility](#)
[Life Cycle Assessment](#)
[Environmental and social impact assessments](#)
[Product development](#)
[Safety](#)
[Environment](#)
[Employees](#)
[Reporting](#)

When establishing a wind farm, an important part of planning should be an assessment of the proposed location and the surrounding environment. This includes the local communities and how the proposed wind farm could potentially impact the physical and social environment. In many countries, environmental and social impact assessments are required by law, or are part of the sustainability requirements of international financial institutions which support infrastructure projects. In most cases Vestas' main business partner – our customers – have the primary responsibility for undertaking the environmental and social impact assessment and for developing the environmental and social management systems for the wind farm. Vestas will work closely together with our customers according to Vestas' contribution to the project.

The environmental aspects of such an environmental and social assessment typically take into account direct and indirect impacts on for instance:

- ▣ Landscape and visual impressions
- ▣ Flora
- ▣ Fauna (e.g. Birds)
- ▣ Noise
- ▣ Shadows

The social aspects typically identify issues such as:

- ▣ Community health and security
- ▣ Land rights
- ▣ Cultural heritage
- ▣ Local employment and livelihoods including job creation

To see publicly available environmental and social impact assessments for wind farm projects, see the European Bank for Reconstruction and Development's database at [Environmental and Social Impact Assessments \[EBRD - Projects\]](#) . An example of an environmental impact assessment of an offshore wind farm – Horns Rev Reef in Denmark – provides interesting reading. This includes studies on the environmental impact the finished project had locally on birds, fish, porpoises, seals and fauna. You can find these at www.hornsrev.dk.


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Managing sustainability

Commitments and policies

Sustainable products

Product responsibility

Life Cycle Assessment

Environmental and social impact assessments

Product development

Safety

Environment

Employees

Reporting

Our knowledge and ability to plan, build, drive and service complete wind power plants for Vestas' customers are increasingly important. They demand individual solutions that provide them with increased business case certainty, reduced cost and maximised revenue.

Vestas is confident that the overall share of wind power in the worldwide energy supply will increase.

Besides continued political support the increase depends on a combination of accurate forecasting of wind power generation, and continuously improved integration with the power system.

To meet those challenges and opportunities, we have broadened our focus to the full range of services that add value though the entire power plant lifecycle. Our most recent offerings are:

- ❑ SiteHunt®: Based on input from 35,000 meteorological stations and a comprehensive wind data library, wind resources around the globe are mapped out and the best sites are selected.
- ❑ SiteDesign®: Once the site has been selected, Vestas helps its customers identify the most suitable turbines and the best on-site position.
- ❑ Electrical Pre-Design: Vestas ensures that electricity generated by the wind power plant constantly delivers the maximum output, meeting the requirements and grid codes of the local power grid.
- ❑ Power Plant Controller: Real-time wind power plant control enhances production and increases the level of reliability. This allows the customer to control production and to meet the requirements of the local power grid.
- ❑ Vestas Performance Manager: Online or via a smartphone application, the customer gains an overview of how the turbines are performing and when they are scheduled for service.
- ❑ PowerForecast: Comprehensive historical data for weather conditions and power production are used to calculate the future power production, allowing customers to fulfil grid requirements all across the globe and enhance revenues on the energy markets. In order to make power generation forecasts even more precise, Vestas began using the "Firestorm" super computer in the summer of 2011, at that time the world's third fastest commercially-owned computer.
- ❑ Active Output Management is a service package targeted at optimising the operation and profitability of the plant. Vestas offers a wide portfolio of service offerings tailored to customers' needs. From full scope solutions like AOM to operational support.

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Safety First – systematic and local approach

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Sustainable products

Safety

Towards zero injuries

Safety awareness

Global standards and processes

Environment

Employees

Reporting

Vestas' goal is zero injuries. We are of the belief that all injuries can be prevented if every hazard is managed and if the right behaviour is in place.

We work closely together with customers to fulfil the demand for the highest level of safety in our operations as this adds certainty for their business case. Also, we actively join hands with partners across the industry to mitigate general risks and improve training.

By putting 'Safety First' we have significantly improved our incident rate* for now seven years in a row.

However, we recognize that working with wind turbines is not hazard free. Heavy components, dizzying heights, unpredictable weather conditions and demanding processes presents a challenging work environment. Safety must be rooted in the business culture and in Vestas this starts at the top. Management is accountable, but all employees shoulder their share of responsibility for their own and their colleague's well-being. With a focus on the individual employee it is enforced that working safely is a condition for employment at Vestas and that we view the employee as the most critical factor in our collective effort to stay safe.

Through root cause studies it's become apparent that more than 90 per cent of industrial injuries are related to people's behaviour. Central to decreasing this trend, is our zero tolerance approach towards actions or decisions that could undermine any aspect of safety, no matter how minor.

At Vestas, we believe that by being aware of safety hazards it is possible to change behaviour and prevent injuries.

Vestas has developed a safety roadmap to methodically approach safety challenges. The initiatives identified are spilt into yearly business plans to ensure that all activities and objectives are rolled out in a coordinated manner across all of Vestas.

*Incidence of industrial injuries per one million working hours – Lost Time Injury

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 Commitments and policies
 Sustainable products
 Safety

[Towards zero injuries](#)

[Safety awareness](#)

[Global standards and processes](#)

[Environment](#)

[Employees](#)

[Reporting](#)

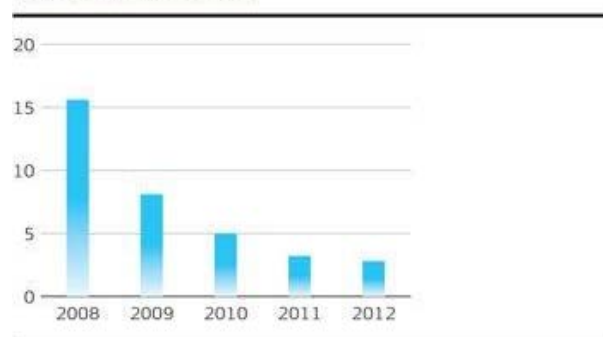
Vestas is on a cultural journey, moving towards taking a collective responsibility for safety. The incidence of industrial injuries per one million working hours at Vestas has been reduced with on average 29 percent every year since 2006 where the journey began. It is now at the level of 2.8 per one million working hours.

In 2015 the target is 0.5 – a significant step in the journey towards eliminating industrial injuries entirely. Achieving a 0.5 rate will challenge the company at every level, but we will not rest until our work environment is free of injuries.

Regrettably, two subcontractors' employees lost their lives in work related accidents in 2012. The first fatal accident occurred in May in Mexico when an employee suffered fatal injuries while cutting down a tree. The second took place in December when an employee operating a crane on a site in Germany suffered fatal injuries when a blade dropped onto the crane cabin during installation of a Vestas wind turbine.

Incidence of industrial injuries (per one million working hours)

Incidence of industrial injuries
 Per one million working hours



Near miss reporting and hazardous observations

At Vestas we register near misses and hazard observations as well as injuries. This is an important step towards achieving a zero injury culture. In 2012 the near miss reporting and hazardous observations were at the same level as 2011 with a total of 17315 reports filled. The number of near miss and hazardous observations per lost time injury has from 2011 to 2012 risen by 15% to 157, which indicate that more people are anticipating injuries before they occur thereby hindering more injuries.

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Fostering a safety culture through awareness

- Managing sustainability
- Commitments and policies
- Sustainable products
- Safety**
 - Towards zero injuries
 - Safety awareness**
 - Global standards and processes
- Environment
- Employees
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Being aware of the safety hazards are key to managing and preventing them. Since 2007, Vestas has deployed a Safety Awareness Programme for employees and managers to raise the awareness of safety with the ultimate objective of eliminating all industrial injuries. All operational managers and team leaders in factories, service and construction sites and offices attend courses to strengthen the safety culture throughout Vestas and instil safe behaviour.

Through safety awareness, recognition programmes and safe behaviour programmes Vestas is moving towards establishing a team based responsibility for safety. Top management's commitment to keep all employees safe and emphasize safe behaviour is being expressed through their participation in safety awareness programmes and their completion of Safety Walks.

A Safety Walk is an opportunity for managers in production, construction, service or administration to discuss safe behaviour and ways of improving safety with employees in their actual job function. The programme has been running since 2007 with consistently more managers participating every year. In 2012, 13923 Safety Walks were conducted whereby the ambition of an average of 12 Safety Walks per manager was reached again.

Building on the manager's training Vestas introduces more in-depth courses on how to become a better safety leader, how to change perceptions about safety, optimising behaviour change during safety walks, managing human behaviour and growing the safety culture. Studies indicate that managers and supervisors should be trained together as their alignment and collective buy-in to safety is essential.

Vestas prioritizes the implementation of global Safety Awareness programmes to cover all production and service managers and employees as well as administrative staff. Furthermore, it is observed that when adapting the programme to local production facilities or site this will have an impact on the injury statistics.

Maturing our safety culture through Behaviour Based Safety programmes is a new initiative which was piloted in production and service in 2012. These initiatives will be run at selected sites to ensure maximum results and safe behaviour improvements.

At Vestas we continue to recognize and reward great safety behaviour with our Safety Ranger and the Safety Medal programmes. In 2011, Vestas introduced the global Safety Ambassador Award for a company elected employee who

promotes safety. In 2012, Venkadeshwaran Velayutham, senior engineer at the Ayakudi Site in India won the award as his constant focus on safety is impressive. His contribution in assessing risks and providing the precautionary measures are of immense value.

Global standards and processes

Managing sustainability
 Commitments and policies
 Sustainable products

Safety

[Towards zero injuries](#)

[Safety awareness](#)

[Global standards and processes](#)

[Environment](#)

[Employees](#)

[Reporting](#)

Customers and employees expect a unified approach to safety regardless of region or country. Vestas agrees. That's why we have developed a wide variety of new global processes, such as:

Incident management

A sustained effort to increase the flow of knowledge in regards to corrective and preventive actions against safety is made. On a monthly basis global knowledge sharing enables proactive learning to establish best practices for reducing the number of injuries.

Contractor safety

At Vestas we have increased focus on contractors, as taking a Safety First standpoint naturally includes the people working side by side with Vestas employees.

Vestas expects zero injuries among contractors, as well as employees.

A contractor management standard has been developed in order to set clear expectations for HSE performance for the contractors that work for Vestas.

Safety Induction programmes

A new safety induction programme for managers and employees has been developed and will be part of the induction programme for new employees. We do this as we put safety first in Vestas, which also means that employees must know what to expect - and what is expected of them - as soon as they arrive.

Electrical Safety

Global standards on "Electrical Safety" and "Control of Hazardous Energy" have been developed in order to eradicate electrical injuries. The global implementation in 2012 was initiated by pilot projects, followed by a range of Master Instructors who will cascade their knowledge into the business. They will use training materials which include e-learning, video modules and local training sessions.

Risk and Opportunities

As part of Vestas' strive for continuous improvements, its process of assessing risks and opportunities has been enhanced to accommodate a growing demand for alignment across areas of Sustainability. The updated process will ensure that all sustainability related risks and opportunities are systematically and effectively identified, quantified, mitigated and monitored in an aligned way throughout the organisation. The scope of the process is to include the identification and assessment of significant Environmental Aspects, Health and safety Hazards and Corporate Social Responsibility Impacts and Security Threats.

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Environment

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- Sustainable products
- Safety
- Environment**
- Chemical management
- Employees
- Reporting

Vestas strives to make wind turbine development, production, service and disposal as green as possible - partly to maintain the industry's most sustainable production in the long term, partly in order to reduce cost – and all of it to strengthen its competitiveness.

Wind power plants have a low carbon footprint, and generate power without emitting CO₂, NO_x and SO_x. They don't consume water during their lifetime of energy production.

Detailed disclosure on not only the corporate environmental performance and initiatives, but also down to the sales unit and factory performance, including trends over the past years, is available [online](#). Furthermore, selected environmental [data](#) is available.

At Vestas we are committed to reducing our impact on the environment by reducing emission of significant greenhouse gasses. Vestas uses [Life Cycle Assessments](#) to develop increasingly resource-efficient products and a production, measured by the carbon footprint as well as other environmental indicators. Our environmental key performance indicators are the carbon footprint and the recyclability of the turbines.

As a company, we aim to decrease our overall use of energy, increase our use of renewable energy, and use less carbon-intensive energy forms.

Vestas aims to lead by example, showing other corporations how businesses can reduce their impact on the environment and spearhead the drive for a low carbon society. By 2015 the [target](#) is for 55 percent of the total energy consumption to come from renewable sources.

At Vestas, all employees contribute to a continual improvement of Vestas' environmental performance through our Sustainability Management System. To support this strive, Environmental Management is globally [certified](#) in accordance with the requirements of ISO 14001.

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Chemical management

- Managing sustainability
- Commitments and policies
- Sustainable products
- Safety
- Environment**
 - [Chemical management](#)
- Employees
- Reporting

Being in control of the chemicals we use in Vestas is part of our management system and essential for a sustainable company.

Only when we are in control of the kind of chemicals we use, are we able to ensure a healthy workplace for our employees and minimum impact to the environment.

Vestas has, in cooperation with a global provider of chemical, regulatory and compliance information services, implemented a global chemical management system. This includes an online system where all employees can enter and obtain essential information about the chemicals used in Vestas.

A global chemical database, as well as a chemical approval process, is part of that system. The global approval process is made to ensure that chemicals are assessed similarly and that they are okay to use from an HSE perspective. Also, that minimum standards based on best practice, are adhered to. In 2013 Vestas will expand the chemical database and add Safety Cards for each product in use. Safety Cards are similar to COSHH- and other workplace assessments and describe on a detailed and understandable level how employees work safely with the chemicals.

Vestas also has a [Material and Chemical Blacklist](#) which identify substances that are banned or restricted with the aim of phasing out their use in our product or production. The ban or restriction is based on legal requirements or decided by Vestas Management.

It is expected that our suppliers fulfill the requirements on the blacklist. Vestas cannot work with suppliers using substances that are prohibited. If the suppliers use chemicals or materials restricted on the blacklist an action plan for phasing out the substance is expected.

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Employees Management Approach

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- Safety
- Environment
- Employees**
- Facts & figures
 - Human rights and labour
- Reporting

Employees are crucial to staying competitive and providing customers with the best service. The company's People Pipeline – employee lifecycle – ensures that the right people are in the right functions throughout the organisation. It enables Vestas to attract, employ, reward, develop and retain the best. The different elements of the pipeline are continuously being refined to ensure that Vestas stays competitive.

At Vestas we know the importance of understanding the culture and background of our customers in order to offer them the best service possible. Therefore, Vestas attempts to foster an inclusive and diverse environment to attract employees of different nationalities, while remaining true to core company values such as Safety First, Quality and the Vestas Code of Conduct. We are also dedicated to continuous improvement of competences. We do that through a variety of internal learning possibilities as well as [career development](#). Vestas has among other things developed three [leadership tracks](#) and [attractive benefits](#).

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Facts & Figures

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- Commitments and policies
- Sustainable products
- Safety
- Environment
- Employees
 - [Facts & figures](#)
- Human rights and labour
- Reporting

Being a global business entails [employing people](#) of different nationalities and cultures. The business must be 'in the region, for the region.

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Recruiting

Vestas is active in more than 70 countries and is constantly seeking opportunities to expand into new markets. We always seek to hire the best suited candidates for vacant positions, based on background and merit. We do thorough assessments of both external and internal candidates, and value opportunities to promote qualified internal talents.

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Training

In 2012, 1035 courses were offered and 381,222 hours of training completed. 97 percent of the training hours were spent in classrooms, 2 percent in online, self-paced training and 0.4 percent in virtual classrooms. On average each employee received 32 hours of training in 2012 with a span from management levels receiving 14 hours of training to other employees receiving 35 hours of training.

Development

The Performance and Development Dialogue (PDD) and People Review are two of our key tools within the area of employee development.

The People Review aims to create insight into the performance and potential of our employees, and to have a structured and proactive approach to performance, action planning, and succession planning. All employees at Manager level (IPE 54+) or above are mandatory to review, but many business units choose to review all employees.

The People Review creates the foundation for the PDD's, which take place after the People Review. The PDD's are discussions between managers and their staff. They ensure that all employees receive feedback on their performance and behaviour for the year and set goals for the coming 12 months – including competence development, such as training. The aim is for all Vestas' employees to have a yearly PDD that is followed up mid-year.

94 percent of Vestas' employees responded to the Employee Survey in 2011 and 85 percent of them confirmed, that they conducted a Performance and Development Dialogue with their manager. Furthermore, the results show an increase in the level of Satisfaction & Motivation by one index point compared to 2010.

Compensation & Reward

Vestas is a global company; inevitably, this means local pay practices and differing market rates. However, the company aims to approach each location in the same manner and with the same guidelines. Thus Vestas seeks to ensure that compensation and reward levels remain fair when comparing, for instance, locations and gender, and remain competitive when comparing to industry standards.

Exit

All employees leaving Vestas, regardless of the reason for their departure, are offered an interview as part of the exit process. This way, the company learns more about why the employee has chosen to leave Vestas, and can devise new methods for making the company more likely to attract and retain talent in the

future.

When having to lay off employees in large numbers, Vestas always ensures negotiations are conducted as quickly as possible and result in decent severance packages for all those affected. Vestas also offers laid-off employees support for further education and outplacements

Human rights and labour

- Managing sustainability
- Commitments and policies
- Sustainable products
- Safety
- Environment
- Employees
 - Facts & figures
 - [Human rights and labour](#)
- Reporting

In 2012, Vestas launched two global policies concerning [human rights](#) and [freedom of association and collective bargaining](#), which outline our commitments and basic approaches. They apply to Vestas' global operations, and cover both Vestas business as well as our approach to business partners

The policies are communicated to relevant stakeholders by providing all employees with access to the policies and related Vestas standards and processes, and by communicating internally and externally on progress in implementing these commitments. Complaints by employees and business partners about breaches of the policies may be submitted to the [Vestas EthicsLine](#).

In the Human Rights Policy Vestas has committed to identifying the human rights impacts and opportunities of Vestas operations on local communities. As a first step in implementing the policy, in 2012 Vestas developed an obligatory social and environmental due diligence process for turnkey projects in emerging markets. Additionally all new markets are screened for human rights and labour risk before first projects in those markets are approved by management.

Internal Training

In 2012 four Webinars were held about the need for social and environmental due diligence in Vestas projects in emerging markets with participants primarily from sales, business development and sustainability functions.

A human rights and security training was developed for contracted security personnel in one high risk market.

Assessments and remediation

During 2011 Vestas executed the Global Labour Standards Self-Assessment Project. This was done in order to assess how Vestas supports the global labour standards and to develop a fact-based action plan.

Based on the assessment findings, Vestas developed a labour standards toolbox and made it available to the business in 2012. The toolbox includes guidelines for implementation of the Vestas freedom of association policy, guidelines on child labour, a checklist on forced and compulsory labour and checklists for forced labour and child labour in vendor management.

Vestas' social and environmental due diligence process for engineering, procurement and construction contracts in emerging markets, developed to spearhead the implementation of the Human Rights policy, ensures the integration of social and environmental risk assessment into the sales process. This process includes document review, customer dialogue, and additionally site visits, and thereby establishing a sound basis for preventing and mitigating risks and potential negative impacts during project execution.

Five visits to Mexico were made to support projects with social challenges, including potential social and environmental impacts on indigenous communities.


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A social and environmental risk profile format was developed and rolled out to business units operating in emerging markets for integration into their new market entry analysis.

Reporting

- [Managing sustainability](#)
- [Commitments and policies](#)
- [Sustainable products](#)
- [Safety](#)
- [Environment](#)
- [Employees](#)
- [Reporting](#)

- [Sustainability data](#)
- [Sustainability reports](#)
- [Recognitions and awards](#)
- [GRI index](#)

At Vestas we believe in being open about the way we operate with regard to the sustainability aspects of our business. To demonstrate this, we report and document the facts using two readily accessible tools:

Our annual report

The annual report describes our overriding objective for our work in the context of sustainability. It also contains statistics on key indicators, as well as expectations for the future.

Statistics on our environmental and health and safety performance

Quarterly reporting gives detailed data on significant environmental and health and safety aspects.

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Vestas by the numbers

Energy

Water

CO2 emissions

Waste

Injuries

[Vestas by the numbers](#) > [Worldwide](#) > Energy

Better use of energy

Vestas has a policy to purchase renewable electricity where available. By procuring renewable electricity and in collaboration with suppliers and authorities, Vestas seeks to ensure better access to renewable electricity. To meet Vestas' WindMade commitment and renewable energy goals, a wind power plant has been established internally to balance out electricity bought in countries where Vestas is not able to buy renewable electricity.

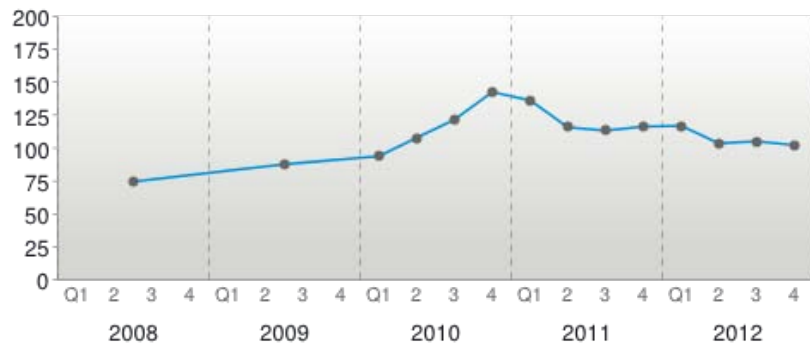
In 2012, Vestas' total energy consumption rose by 8 per cent. When index-linked to produced and shipped MW, Vestas' energy consumption decreased as the utilisation of the production facilities rose -- Vestas expects the index to decrease further as capacity is adjusted.

A high capacity utilisation increases energy efficiency. The key driver behind the increase in energy consumption is the increased production at Vestas' blades factories, which have increased the production of blades measured in tonnes by 42 per cent from 2011 to 2012. The production of blades is one of the most energy-intensive processes in Vestas measured as MWh consumed per tonnes of raw material used.

It is very positive to note that Vestas' share of renewable electricity increased to 89 per cent in 2012 -- up from 68 per cent in 2011. Part of this is Vestas' active sourcing of renewable electricity, another part is Vestas' owned wind power plants. By actively sourcing renewable electricity, Vestas has saved 110,000 tonnes of CO2 emissions.

Energy consumption per megawatt produced and shipped

Vestas Worldwide (MWh/MW produced)



On average over the last four quarters, Vestas facilities worldwide used about the same amount of energy to produce a wind turbine as last quarter's average.

The graph shows how much energy, measured in megawatt hours, is needed to produce a wind turbine with the capacity to generate 1 megawatt per hour. In 2009, for example, the average was about 88 MWh/MW, meaning the wind turbines had to run at full speed for 88 hours to produce enough energy to make up for Vestas' production.

Renewable energy usage

Vestas Worldwide (%)

Renewable electricity usage

Vestas Worldwide (%)

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i [Worldwide data](#)

i [Data by country](#)

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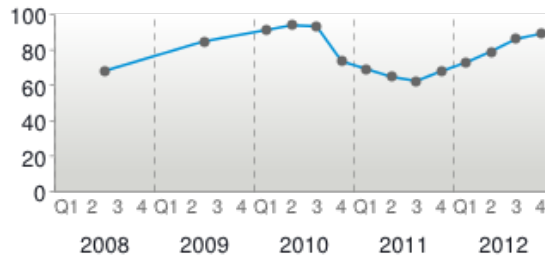
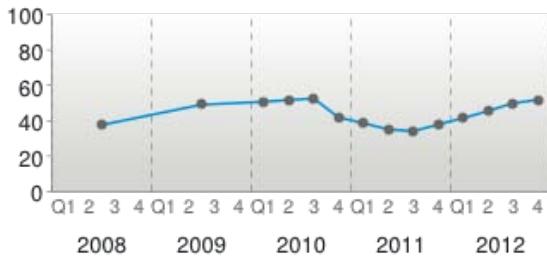
i [Data by facility type](#)

- [Blade Factory](#)
- [Controller- and Electronics factory](#)
- [Foundry](#)
- [Generator factory](#)
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- [Nacelle assembly factory](#)
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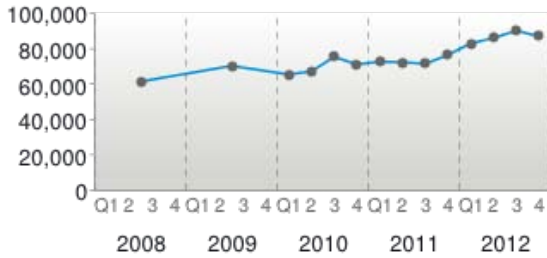
On average over the last four quarters, Vestas facilities worldwide succeeded in drawing more of their energy from renewable sources. The company's renewable energy use worldwide was 51.8 percent, up from last quarter's average of 49.9 percent

Vestas facilities worldwide also succeeded in using more renewable electricity. The company's average renewable electricity use worldwide over the last four quarters was 89.0 percent, up from last quarter's average of 86.1 percent

The graphs show the proportion of energy and electricity that come from renewable sources.

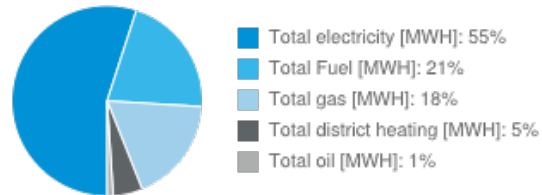
Electricity consumption

Vestas Worldwide (MWh/quarter)



Energy consumption by type

Vestas Worldwide



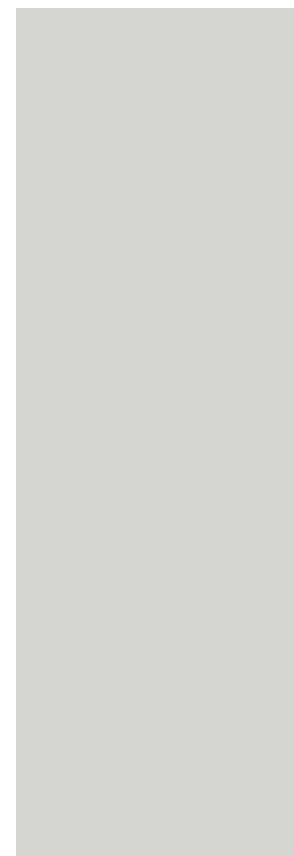
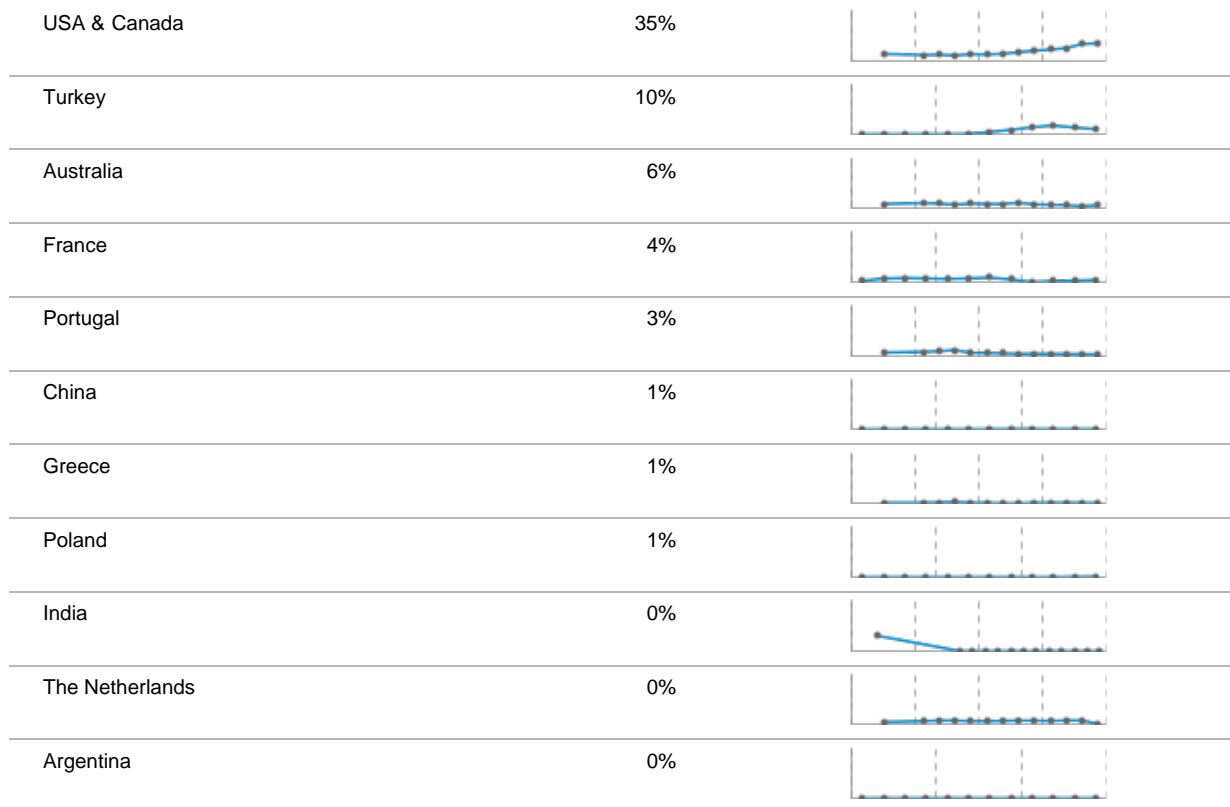
On average over the last four quarters, Vestas facilities worldwide used about the same amount of electricity as the average from a quarter before.

The chart shows how much of each different type of energy -- electricity, district heating, gas, fuel and oil -- that Vestas factories worldwide used in production last quarter.

A note about the numbers: In most cases, the numbers presented here are based on either annual or four-quarter rolling averages. For example, the total displayed for the second quarter of 2010 actually represents an average of that quarter and the three quarters before it. This is done to smooth out seasonal variations in production and supply, to more accurately show trends in resource use at Vestas. Injuries and employment information are the only aspects not calculated on a rolling basis.

Renewable energy usage by country

Country	Latest data	Line Chart
Denmark	100%	
Norway	97%	
Spain	76%	
Sweden	73%	
Italy	58%	
United Kingdom	54%	
Germany	53%	



Sustainability reports

- [Managing sustainability](#)
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When reporting on sustainability Vestas describes the overall objectives for:

- [Working with sustainability](#)
- [Tracking performance](#)
- [Achieving targets](#)
- [Setting expectations for the future](#)

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- [Environmental Statement 2002](#)
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Recognitions and awards

- Managing sustainability
- Commitments and policies
- Sustainable products
- Safety
- Environment
- Employees
- Reporting**
- Sustainability data
- Sustainability reports
- Recognitions and awards**
- GRI index

Vestas received a number of recognitions of its ambition of achieving excellence in sustainability.

Member company of the [FTSE4Good Index](#)

Member company of the [ECPI Thematic Indices](#) (Carbon, Climate Change, Renewable Energy)

Member company of the [STOXX ESG Leaders indices](#)

Member company of the [Global Challenges Index](#)

[Carbon Disclosure Project](#), fourth year included in Nordic 200

Vestas has won the 2011 title of “Learning Leader” for its free e-learning modules about wind turbines, available via www.vestaselearning.com/explore/

[Zayed Future Energy Prize](#)

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GRI and Global Compact Index

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[Recognitions and awards](#)

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[Strategy and profile](#)

[Economic performance indicators](#)

[Environmental performance ind.](#)

[Social performance indicators](#)

Vestas bases its reporting on the Global Reporting Initiative's Sustainability Reporting Guidelines and has followed the G3 guidelines since 2010. The Guidelines provide a disclosure framework of management approaches and performance against indicators for economic, environmental and social impacts, as well as a company profile.

Based on the GRI guidance and requirements, we are selfdeclaring an Application Level of B for the combined reporting in the Annual Report and online. The index lists references in the Annual Report as well as online information.

Vestas signed up to the United Nations Global Compact in 2009. We report on our implementation of the ten Global Compact Principles in the areas of human rights, labour, environment and anti-corruption. In addition to the GRI reporting elements, this online index also contains details of topics relevant to the Global Compact Principles. The ten principles have been linked to the GRI indicators.

Vestas is implementing the UN Global Compact Advanced Programme. See Vestas' status on [realizing the UN Global Compact Advanced](#).

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Employees

Reporting

Sustainability data

Sustainability reports

Recognitions and awards

GRI index

[Strategy and profile](#)

Economic performance indicators

Environmental performance ind.

Social performance indicators

Indicator	Link	Fulfilment & Comment	GC Principles
1. Strategy and Analysis			
1.1 Statement from the CEO	Sustainability	Full	
1.2 Key impacts, risks, and opportunities	Repositioned for renewed growth Highlights for the Group Key impacts, risks and opportunities	Full	
2. Organizational Profile			
2.1 Name of the organization	Legal entities	Full	
2.2 Primary brands, products, and/or services	Business development Sustainable products	Full	
2.3 Operational structure of the organization	Management structure	Full	
2.4 Location of organization's headquarters.	Legal entities	Full	
2.5 Number of countries where the organization operates	Installed GW	Full	
2.6 Nature of ownership and legal form	Management structure Legal entities	Full	
2.7 Markets served	Market development	Full	
2.8 Scale of the reporting organization	Highlights for the Group Consolidated accounts	Full	
2.9 Significant changes during the reporting period	Manufacturing footprint	Full	
2.10 Awards received in the reporting period.	Awards and prizes	Full	
3. Report Parameters - Report profile			
3.1 Reporting period	Highlights for the Group	Full	
3.2 Date of most recent previous report	Highlights for the Group	Full	
3.3 Reporting cycle	Highlights for the Group	Full	

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3.4 Contact point for questions regarding the report	Sustainability	Full	
Report Parameters - report scope and boundary			
3.5 Process for defining report content	Prologue Highlights for the Group	Full	
3.6 Scope of the report	Accounting policies	Full	
3.7 Limitations on the scope of the report	Accounting policies	Full	
3.8 Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations etc.	Accounting policies	Full	
3.9 Data measurement techniques and the bases of calculations	Accounting policies	Full	
3.10 Re-statements of information provided in earlier reports	Accounting policies	Full	
3.11 Significant changes from previous reporting periods in the scope of the report	Accounting policies	Full	
Report Parameters - GRI content index			
3.12 GRI overview	GRI overview	Full	
Report Parameters - Assurance			
3.13 External assurance for the report	Auditor's statement Auditor's report	Full	
4. Governance, Commitments, and Engagement - Governance			
4.1 Governance structure of the organization	Corporate Governance Organising sustainability Facts & figures	Full	1-10
4.2 The roles of the chairman of the Board and the CEO	Board of Directors Executive Management	Full	
4.3 Members of the Board	Board of Directors	Full	
4.4 Mechanisms for shareholders and employees to provide recommendations to the Board	General meeting Company announcements	Full	
4.5 Linkage between compensation for Board members, senior managers, and executives and the organization's performance	Remuneration	Full	
4.6 Processes in place for the Board to ensure conflicts of interest are	Board of Directors	Full	

avoided			
4.7 Process for determining the qualifications of the Board members	Board of Directors	Full	
4.8 Statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation	Social and environmental priorities Commitments and policies	Full	
4.9 Procedures for the Board to overseeing the organization's identification and management of economic, environmental, and social performance	Board of Directors Organising sustainability	Full	
4.10 Processes for evaluating the Boards own performance, particularly with respect to economic, environmental, and social performance	Board of Directors	Full	
Governance, Commitments, and Engagement - Commitments to external initiatives			
4.11 Explanation of whether and how the precautionary approach or principle is addressed by the organization	Management systems Chemical management	Full	7
4.12 Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organization subscribes or endorses	Social and environmental priorities Commitments and policies	Full	1-10
4.13 Memberships in associations	Memberships	Full	1-10
Governance, Commitments, and Engagement - Stakeholder Engagement			
4.14 List of stakeholder groups engaged by the organization	Relations with stakeholders Stakeholder engagement	Full	
4.15 Identification and selection of stakeholders with whom to engage	Relations with stakeholders Stakeholder engagement	Full	
4.16 Approaches to stakeholder engagement	Customer loyalty Relations with stakeholders Stakeholder engagement	Full	
4.17 Key topics and concerns that have been	Social and environmental priorities	Full	

raised through
stakeholder engagement

[Highlights for the Group](#)
[Stakeholder engagement](#)

Economic performance indicators

Managing sustainability
Commitments and policies
Sustainable products
Safety
Environment
Employees
Reporting
Sustainability data
Sustainability reports
Recognitions and awards
GRI index
Strategy and profile
Economic performance indicators
Environmental performance ind.
Social performance indicators

Indicator	Link	Fulfilment & Comment	GC Principles
Disclosure on Management Approach	Financial priorities Financial risks	Full	1, 4, 6, 7
Aspect: Economic Performance			
EC1 Direct economic value generated and distributed	Consolidated accounts	Full Note*	
EC3 Coverage of the organization's defined benefit plan obligations	Consolidated accounts, note 1	Partial	
EC4 Significant financial assistance received from government	Consolidated accounts, note 2, 16 and 34	Full	

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Notes	2012	2011	2010
*Economic value generated and distributed			
Direct economic value generated			
Revenues 1	7,216	5,836	6,920
Economic value distributed			
Operating costs 2	6,637	4,681	5,585
Employee wages and benefits 3	1,276	1,215	1,025
Payments to providers of capital 4	92	60	49
Payments to governments 5	97	69	131
	8,102	6,025	6,790
Economic value retained	-886	-189	130

1. Refer to the Group's consolidated income statement
2. Operating costs - is the sum of costs of sales, research and development costs, distribution expenses and administrative expenses minus employee wages and benefits included in the Group's consolidated income statement
3. Refer to note 6 of the Group's consolidated financial statements
4. Refer to note 10 of the Group's consolidated financial statements
5. Refer to note 22 of the Group's consolidated financial statements

Environmental performance ind.

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 Commitments and policies
 Sustainable products
 Safety
 Environment
 Employees

Reporting

Sustainability data
 Sustainability reports
 Recognitions and awards

GRI index

Strategy and profile
 Economic performance indicators
[Environmental performance ind.](#)
 Social performance indicators

Indicator	Link	Fulfilment & Comment	GC Principles
Disclosure on Management Approach	Environmental priorities Management systems Sustainable products Environment	Full	7, 8, 9
Aspect: Materials			
EN1 Materials used by weight or volume	Highlights for the Group Resource consumption	Full	8
Aspect: Energy			
EN3 Direct energy consumption by primary energy source	Environment	Full	8
EN4 Indirect energy consumption by primary source	Environment	Full	8
EN6 Initiatives to provide energy-efficient or renewable energy based products and services	Highlights for the Group Carbon footprint/Life cycle assessment Sustainable products	Full	8, 9
Aspect: Water			
EN8 Total water withdrawal by source	Highlights for the Group Environment	Full	8
Aspect: Emissions, Effluents, and Waste			
EN16 Total direct and indirect greenhouse gas emissions by weight	Environmental impact Sustainability data	Full	8
EN21 Total water discharge by quality and destination	Environment	Partial	8
EN22 Total weight of waste by type and disposal method	Waste disposal Environment Sustainability data	Full	8
EN23 Total number and volume of significant spills	Highlights for the Group	Full	8

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Aspect: Products and services			
EN26 Initiatives to mitigate environmental impacts of products and services	Carbon footprint/Life cycle assessment Sustainable products	Full	7, 8, 9
Aspect: Compliance			
EN28 Value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations		Full Note 1	8
Notes			
1 If there are significant fines they are included in the financial accounts			



Social performance indicators

- Managing sustainability
- Commitments and policies
- Sustainable products
- Safety
- Environment
- Employees
- Reporting**
- Sustainability data
- Sustainability reports
- Recognitions and awards
- GRI index**
- Strategy and profile
- Economic performance indicators
- Environmental performance ind.
- Social performance indicators**

Indicator	Link	Fulfilment & Comment	GC Principles
Labour practices and decent work			
Disclosure on management approach	Social priorities Diversity Safety Employees	Full	1, 3, 6
Aspect: Employment			
LA1 Workforce by employment type, employment contract, and region	Employees	Full	
LA2 Number and rate of employee turnover by age group, gender, and region	Employees	Full	6
Aspect: Occupational Health and Safety			
LA7 Rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	Safety Safety	Partial	1
Aspect: Training and education			
LA10 Average hours of training per year per employee by employee category	Employees	Partial	
LA11 Programs for skills management and lifelong learning that support the continued employability of employees	Employees	Partial	
LA12 Percentage of employees receiving regular performance and career development reviews	Employees	Full	
Aspect: Diversity and Equal Opportunity			
LA13 Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership etc.	Diversity Employees	Full	1, 6
Human rights			

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Disclosure on management approach	Social responsibility Human rights and labour	Full	1-6
Aspect: Investment and Procurement Practices			
HR2 Percentage of significant suppliers, contractors that have undergone screening on human rights	Supply chain risks Suppliers	Partial	1-6
Aspect: Freedom of association and collective bargaining			
HR5 Operations identified in which the right to exercise freedom of association and collective bargaining may be at significant risk	Social responsibility Human rights and labour	Full	1, 2, 3
Aspect: Child labour			
HR6 Operations identified as having significant risk for incidents of child labour	Social responsibility Human rights and labour	Full	1, 2, 5
Aspect: Forced and compulsory labour			
HR7 Operations identified as having significant risk for incidents of forced or compulsory labour	Social responsibility Human rights and labour	Full	1, 2, 4
Society			
Disclosure on management approach	Social responsibility Sustainability risks Code of Conduct Commitments and policies Stakeholder engagement Human rights and labour Environmental and social impact assessment	Full	10
Aspect: Society			
SO5 Public policy positions and participation in public policy development and lobbying	Legislative risks Stakeholder engagement Political affairs	Full	7, 8, 9
Aspect: Anti-competitive behavior			
SO7 Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices		Full Note 1	
Aspect: Compliance			
SO8 Value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations		Full Note 2	

Product responsibility

Disclosure on management approach	Product responsibility and compliance Product responsibility	Full	1, 8
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Aspect: Product and Service Labeling

PR5 Practices related to customer satisfaction	Customer loyalty Customer loyalty	Full	
PR9 Value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services		Full Note 2	

Notes

- 1 If there are legal actions they are included in the Annual Report
 - 2 If there are significant fines they are included in the financial accounts
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