

# Vestas Human Rights Policy

The Universal Declaration of Human Rights states that all human beings are born free and equal without distinction of any kind based on colour, ethnic origin, sex, language, religion, political beliefs and other opinions, national and social origin, property, birth and other status. Our approach to human rights is based on these fundamental principles.

## Our commitment

Vestas Wind System A/S (Vestas) commits to respecting human rights and strives to contribute to the positive realisation of human rights across our activities. We are vigilant in ensuring our activities do not infringe upon human rights and address adverse human rights impacts with which we may be involved. We also seek ways to advance opportunities for own workers, workers in the supply chain and affected communities where we have operations.

Vestas has been a signatory to the United Nations Global Compact since 2009 and we are committed to the United Nations Guiding Principles on Business and Human Rights (UNGP) and the Organisation for Economic Co-operation and Development Description Guidelines for Multinational Enterprises on Responsible Business Conduct (OECD). Accordingly, we are committed to respecting internationally recognised human rights, including those set out in the International Bill of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and additional ILO conventions on labour standards on working hours, wages and benefits, and health and safety.

Vestas will comply with all applicable laws of the countries in which we operate in. When local laws and regulations set lower standards, but do not prohibit applying international human rights principles that exceed local laws and regulations, Vestas will seek ways to honour international human rights principles.

We implement our commitment to respect human rights via our Employee Code of Conduct, Supplier Code of Conduct, and other internal policies and procedures.

## Scope

This Policy applies to Vestas' own operations. We aim to implement similar standards in joint ventures in which Vestas has a controlling interest and will use our ownership leverage to encourage non-controlled entities to do the same. Our suppliers must adhere to these human rights commitments and ensure their suppliers follow suit. We also encourage our customers to adopt similar commitments.

## Human rights due diligence

Vestas has created a risk-based due diligence framework describing how we identify and assess actual and potential human rights impacts on people across the value chain, integrate and act upon the findings in the relevant functions, and how we track and communicate about our performance.

Our corporate-wide Human Rights Assessment is conducted regularly, and with a frequency of minimum every three years, and identifies Vestas' salient human rights issues across our value chain. Our salient human rights issues are identified based on the severity of the impact determined by its scale, scope, and irremediability and the likelihood of the impact occurring. The findings are assigned to and acted upon by the appropriate business functions. We communicate about the salient human rights on our company website.

We are aware of specific salient human rights issues particular to our industry, including community engagement, land acquisition and resettlement, the rights of indigenous people, and exposure to forced labour. When operating in conflict-affected or high-risk areas, we also recognise a need to conduct heightened human rights due diligence.

Human rights due diligence is undertaken in the value chain both upstream and downstream to identify, prevent, mitigate and account for any adverse human rights impacts either caused by our operations, or to which we have contributed. Where Vestas risks being directly linked to an adverse impact we will seek ways to use our leverage to mitigate the impact. The due diligence is undertaken in accordance with the nature and context of our operations.

We acknowledge the importance of engaging with affected stakeholders or their legitimate representatives, and expert organisations, whose human rights are potentially or actually impacted by our operations. When risks to vulnerable populations arise, we will adhere to international principles upholding the rights of groups like indigenous peoples, women, minorities, children, migrant workers, and human rights defenders. Vestas does not tolerate threats, intimidation, physical or legal

attacks against these groups that lawfully are exercising their rights to freedom of expression, association, peaceful protest or assembly in relation to our business or operations.

We seek ways to promote responsible business conduct by addressing human rights issues through commercial leverage and through e.g. industry associations and multistakeholder initiatives.

## Grievance mechanism and remediation

Even with relevant mitigation measures in place, adverse human rights impacts may still result from our operations and impacted communities must be able to seek remedy. Therefore, we commit to a transparent process for stakeholders to express their concerns and file a grievance, including anonymous complaints, and remedying adverse impacts on individuals, workers, and communities that the company has caused or may have contributed to, and will not obstruct access to remedies.

We expect our business partners to have a grievance mechanism and remedy process proportionate to their size, complexity and to the risk of their business environment in place.

We commit to collaborating with judicial or non-judicial mechanisms such as national courts, Ombuds institutions, OECD National Contact Points, national human rights institutions as a mean to provide access to remedy.

## Governance

The Human Rights Policy is subject to periodic review and update by the Board and is made available to stakeholders internally and externally.

Approved by the Board of Directors of Vestas Wind Systems A/S

Denmark, 4 November 2024



Anders Runevad,  
Chair

# Annex

## Definition of human rights

"Human rights are rights inherent to all human beings, whatever our nationality, place of residence, sex, national or ethnic origin, colour, religion, language, or any other status. We are all equally entitled to our human rights without discrimination. These rights are all interrelated, interdependent and indivisible.

Universal human rights are often expressed and guaranteed by law, in the forms of treaties, customary international law, general principles and other sources of international law. International human rights law lays down obligations of Governments to act in certain ways or to refrain from certain acts, in order to promote and protect human rights and fundamental freedoms of individuals or groups."

Source: Office of the High Commissioner for Human Rights, OHCHR, *What are Human Rights?*

## The Human Rights referred to in this Policy include:

- The International Bill of Human Rights (consisting of the Universal Declaration of Human Rights and the main instruments through which it has been codified: The International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights)
- The eleven International Labour Organisation's core conventions: Freedom of association and the effective recognition of the right to collective bargaining (Convention No. 87 & No. 98), Elimination of all forms of forced or compulsory labour (Convention No. 29 & No. 105), Effective abolition of child labour (Convention No. 138 & No. 182), Elimination of discrimination in respect of employment and occupation (Convention No. 100 & No. 111), and the promotion and implementation of the fundamental principle and right at work of a safe and healthy working environment (Convention No. 155 & No. 187).
- ILO Convention No. 169 on Indigenous and Tribal Peoples and the United Nations Declaration on the Rights of Indigenous Peoples
- The UN Declaration on human rights defenders

## Reference to relevant Vestas' policies and statements

The policies are subject to periodic review as per our Global Policy, whereas the statements are updated annually.

- Vestas Employee Code of Conduct
- Vestas Supplier Code of Conduct
- Vestas Quality, Health, Safety and Environmental Policy
- Vestas Conflict Minerals Policy
- Vestas Freedom of Association Policy
- Vestas Diversity, Equity, Inclusion & Belong Policy
- Modern Slavery Statements (UK & Australia)
- Norwegian Transparency Act Statement