

**Renewable Energy & Human Rights Benchmark 2025  
Company Profile**

**Company name** Nordex  
**Sub-sector** Wind turbine manufacturer  
**Overall score** 15% weighted average

Section score	Weighting	For section
34%	20%	1. UNGP core indicators
6%	40%	2. Salient human rights risks
N/A	10%	3.a Response to risk of exposure to forced labour
N/A	10%	3.b Serious allegations
N/A	20%	4. Low-Carbon Transition Assessment

Please read the disclaimer at the end of this scorecard and refer to the full methodology when perusing this scorecard. The methodology as well as additional analysis can be found [here](#).

The use of the label "Not met" in the research does not necessarily mean that the company does not meet the requirements as they are described in the accompanying bullet point short text. Rather, it means that the analysts could not find information in public sources that met the requirements as described in full in the 2025 Renewable Energy & Human Rights Methodology document. It is possible that a Company meets the criteria without yet publishing the relevant evidence of doing so. This may include cases where a company has claimed to meet the criteria in the engagement phase or otherwise but where the public record was still not sufficient to meet the criteria by the relevant cut off dates.

**Detailed assessment**

**1. UNGP core indicators based on the CHRB methodology (20% of total)**

**A. Policy commitments and governance**

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1	Commitment to respect human rights	2	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: General HRs commitment: The Company has a Human Rights Policy where it states its commitment to major human rights frameworks: 'In line with the United Nations Guiding Principles on Business and Human Rights (UNGPs) we at Nordex are committed to the United Nations Universal Declaration of Human Rights, the International Labour Organisation's (ILO) core labour standards and the ILO's Declaration on the Fundamental Principles and Rights at Work. We follow the OECD Guidelines for Multinational Enterprises and the principles outlined in the UN Global Compact, as well as international legislation where we operate.'. [Human Rights Policy: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Met: Commitment to UNGPs: In its Human Rights Policy, the Company commits to act in line with the UNGPs and states that it follows the OECD Guidelines. [Human Rights Policy: <a href="https://nordex-online.com">nordex-online.com</a>]</li> </ul>
A.2	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	2	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Commitment to ILO core principles: The Company, in its Human Rights Policy states that 'we at Nordex are committed to the United Nations Universal Declaration of Human Rights, the International Labour Organisation's (ILO) core labour standards and the ILO's Declaration on the Fundamental Principles and Rights at Work.' [Human Rights Policy: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Met: Expects business relationships to commit to ILO core principles: In its Human Rights Policy, the Company states that it does 'not tolerate, nor condone abuse of human rights within any part of our business or supply chains'; and in its Code of Conduct for Contractors and Suppliers, it states that it expects from its contractors and suppliers (...) integrity and ethical law-abiding behavior as well as</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			strict adherence to the principles set out in the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the International Labor Organisation's core labor standards, and the ILO's Declaration on the Fundamental Principles and Rights at Work'. [Human Rights Policy: <a href="https://nordex-online.com">nordex-online.com</a> ] & [Code of Conduct for Contractors and Suppliers: <a href="https://nordex-online.com">nordex-online.com</a> ]
A.3	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to remedy adverse HRs impacts: In its Human Rights Policy, the company states as a commitment that it 'will work to ensure effective provision of remedy wherever human rights occur through company-based grievance mechanisms.' However, it is unclear if the Company commits to providing remedy for adverse Human Rights impacts if the cases have not been raised through the company-based grievance mechanism. [Human Rights Policy: <a href="https://nordex-online.com">nordex-online.com</a>] &amp; [Sustainability Report 2023: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Expects business relationships to make this commitment</li> <li>• Not Met: Commitment to collaborate with judicial or non-judicial mechanisms</li> <li>• Not Met: Commitment to work with business relationships on remedy</li> </ul>
A.4	Commitment from the top	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Board level responsibility for HRs: In its Human Rights Policy, the Company states that 'the Board of Nordex is responsible for ensuring adherence to these commitments and our senior management has responsibility for overseeing their implementation and ensuring that any breaches of this Policy or any of its related policies and procedures are investigated'. In its Sustainability Report, the Company indicates that 'Updates on sustainability-related activities and developments are provided to the Management Board on a monthly basis. The Supervisory Board also receives regular presentations on sustainability development'. Furthermore, the company state in its Integrated Annual Report 2024 that 'the CEO and Chief People Officer are accountable for its implementation'. The Company also has Supervisory Board, composed of members, is responsible for ESG topics. The Supervisory Board received quarterly presentations on sustainability-related topics'. However, no information was found on a particular board member or board committee that holds the responsibility for the Company's human rights commitments. [Human Rights Policy: <a href="https://nordex-online.com">nordex-online.com</a>] &amp; [Integrated Annual Report 2024: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Describes HRs expertise of Board member</li> <li>• Not Met: Board member/CEO signal importance of HRs in their communications: The company indicate the Code of Conduct for Employees on its feedback, but no evidence is found on specific discussion of why human rights matter to the business. [Code of Conduct for Employees: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: CEO or board incentives</li> </ul>
A.5	Responsible lobbying and political engagement fundamentals	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Publicly available policy statement(s) (or policy(ies)) setting out lobbying and political engagement approach.: The Company states on its Annual Integrated Report that 'we uphold a zero-tolerance policy for all forms of corruption...Any active or passive bribe aimed at influencing or receiving a benefit for the Nordex Group, its employees, or third parties is strictly prohibited. This includes illegal contributions to public officials and candidates for political parties and organizations'. [Integrated Annual Report 2024: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Monetary value of direct political contributions</li> <li>• Not Met: Monetary value of indirect political contributions</li> <li>• Not Met: Requirement for third-party lobbyists to comply with the Company's lobbying and political engagement policy (or policies)</li> </ul>

## B. Embedding respect and human rights due diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1	Responsibility and resources for day-to-day human rights functions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Senior responsibility for HRs implementation and decision making: In its Sustainability Report, the Company states that 'The Sustainability department is responsible for the company's Sustainability Strategy and manages internal and external processes to meet stakeholder requirements. It coordinates with various departments to manage ESG impacts and engages in ongoing dialogue with stakeholders. The department also handles regulatory reporting and supports local sustainability projects in general. It reports directly to the Chief Financial Officer of the Nordex Group'. [Sustainability Report 2023: <a href="https://nordex-online.com">nordex-online.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Describes day-to-day responsibility for implementing HRs commitments: In its Human Rights Policy, the Company states that 'We recognise that our success is based on a corporate culture that embeds responsible business into everything we do, and our leaders are responsible for providing direction and clarity'. It also mentions adequate training of employees, and due diligence mechanisms. However, it fails to describe day-to-day assignments for implementing its Human Rights Policy. [Human Rights Policy: <a href="https://www.nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Day-to-day resources and expertise allocation in own operations</li> <li>• Not Met: Resources and expertise allocation in supply chain</li> </ul>
B.2	Identifying human rights risks and impacts	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Describes process of identifying risks in own operations: In its Sustainability Report, the Company states that 'To identify key sustainability issues, we conducted a comprehensive materiality analysis in 2021. This analysis considers both the impact the Nordex Group has on its stakeholders (inside-out, i.e., impact materiality) and the areas where sustainability patterns impact the Nordex Group's business (outside-in, i.e., financial materiality). We conducted desk research, including analyses of regulations, ESG ratings, benchmarks and media screening. We also conducted internal and external expert interviews, engaged employees by running an online survey, and held a stakeholder roundtable. Two management workshops were held to discuss and confirm the final list of material topics, targets and measures. (...) In 2023, the Sustainability department updated its materiality analysis by revisiting the previous process and comparing it with current developments.' It also mentions that 'to identify the risks of any violations of the above, whether in the supply chain or in our own business entities, we are continuing to refine our risk analysis procedures and responsibilities, in particular by nominating dedicated, knowledgeable and locally-based staff to identify, reduce and mitigate the aforementioned risks. We have also nominated a Human Rights Officer, who oversees related due diligence processes, double-checks that they are being conducted in a meaningful way, and monitors the appropriateness and efficiency of preventive and remedial measures.' However, the identification of material topics is not equivalent to the identification of human right risks. In its GSCA 2024 Policy Statement the Company indicates that 'The Nordex Group has defined a comprehensive methodology to analyze, assess, prioritize and address human rights- and environment-related risks in its supply chain and in its own business area. It addresses the BAFA-recommended approach and is built on the due diligence methodology as laid out in the OECD Due Diligence Guidance for Responsible Business Conduct. The assessment and the prioritization of risks and violations enable the Nordex Group to get a comprehensive understanding of the companies' GSCA-risk situation, and to prioritize the risks. This enables the company to manage the risks, and to define, implement and monitor adequate mitigation measures. For the Nordex Group's own business area, the GSCA-risks are identified by appointed GSCA risk managers and owners at each legal entity. They classify the risks according to their probability of occurrence and the severity of violation in four steps, from low risk up to high risk. They document the results in a risk inventory together with preventive measures and remedial actions, and visualize the overall assessment results in a risk matrix.' However, no detailed information on the process used to identify human rights risks in the Company's own operations was found. [Sustainability Report 2023: <a href="https://www.nordex-online.com">nordex-online.com</a>] &amp; [2024 Policy Statement Pursuant to the German Supply Chain Due Diligence Act (GSCA): <a href="https://www.nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Describes process for identifying risks in business relationships: In its Sustainability Report, the Company states that 'Our supplier due diligence covers all demands placed on our suppliers regarding finance, quality, compliance, human rights and environmental aspects along the supply chain. 'However, it fails to describe how it identifies human rights risks in its supply chain and business relationships. In the GSCA 204 Policy Statement the Company states 'Suppliers with an increased risk exposure (high-risk suppliers) are identified by using internationally recognized country and industry indices. This clarifies whether the Nordex Group has tier-1 suppliers in GSCA high-risk countries or high-risk sectors. While strictly considering these identification criteria, the risk analysis further prioritizes suppliers by taking into account the Nordex Group's causal contribution ("Verursachungsbeitrag") to the risks, mainly by considering the purchasing volume per supplier. Applying country risk, sector risk and causal contribution by purchasing volume as criteria, the abstract risk analysis results in the sum of the high-risk tier-1 suppliers of Nordex SE, its subsidiaries, and of Nordex Energy SE &amp; Co. KG. Identified high-risk suppliers undergo a more specific analysis in order to detect potential GSCA-risks in their own operations or resulting from their</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>activities. The Nordex Group collects the necessary information via questionnaires that it sends to the high-risk suppliers. These are designed to comprehensively address the human rights and environmental positions protected by the GSCA. Based on the answers provided by the suppliers, the Nordex Group's risk managers analyse if concrete GSCA-related risks result from a supplier, taking into account the probability of occurrence and the severity of a potential violation. The risk analysis processes described above are executed annually. In addition, risk analyses are carried out on an ad-hoc basis. An ad-hoc risk analysis is triggered by a substantial change in the Nordex Group's business activities or by actual evidence of a possible violation of a human rights or environmental obligation in the Nordex Group's own business area, or at tier-1 suppliers and their suppliers.' However, no information could be found on a process to identify human rights risks in the Company's business relationships beyond tier-1 suppliers. [Sustainability Report 2023: <a href="https://nordex-online.com">nordex-online.com</a>] &amp; [2024 Policy Statement Pursuant to the German Supply Chain Due Diligence Act (GSCA): <a href="https://nordex-online.com">nordex-online.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Describes risk identification system incl. stakeholder consultation: In its Sustainability Report, the Company states 'We also conducted internal and external expert interviews, engaged employees by running an online survey, and held a stakeholder roundtable.' However, it does not explain how it involved stakeholders in their human rights risk identification process. [Sustainability Report 2023: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Met: Describes how risk identification system is triggered by new circumstances: The Company states in the GSCA 2024 Policy Statement that 'The risk analysis processes described above are executed annually. In addition, risk analyses are carried out on an ad-hoc basis. An ad-hoc risk analysis is triggered by a substantial change in the Nordex Group's business activities or by actual evidence of a possible violation of a human rights or environmental obligation in the Nordex Group's own business area, or at tier-1 suppliers and their suppliers. The starting point for a possible ad-hoc risk analysis is an immediate report to the HREO who will then initiate further steps and/or involve the relevant risk managers.' [2024 Policy Statement Pursuant to the German Supply Chain Due Diligence Act (GSCA): <a href="https://nordex-online.com">nordex-online.com</a>]</li> </ul>
B.3	Assessing human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Describes assessment process and discloses salient HRs risks: In its 2024 Policy Statement Pursuant to the German Supply Chain Due Diligence Act, the Company states that 'The Nordex Group has defined a comprehensive methodology to analyze, assess, prioritize and address human rights- and environment- related risks in its supply chain and in its own business area. It addresses the BAFA-recommended approach and is built on the due diligence methodology as laid out in the OECD Due Diligence Guidance of Responsible Business Conduct.(...) For the Nordex Group's own business area, the [German Supply Chain Act(GSCA)]risks are identified by appointed GSCA risk managers and owners at each legal entity. They classify the risks according to their probability of occurrence and the severity of violation in four steps, from low risk up to high risk. They document the results in a risk inventory together with preventive measures and remedial actions, and visualize the overall assessment results in a risk matrix'. This statement lacks details to the process employed to assess the Company's human rights risk. In particular, it is unclear if the assessment takes into consideration relevant factors (geographical, social, etc.) [2024 Policy Statement Pursuant to the German Supply Chain Due Diligence Act (GSCA): <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Describes how process applies to supply chain: In its 2024 Policy Statement Pursuant to the German Supply Chain Due Diligence Act, the Company states that ' risk managers at the Nordex SE Global Sourcing department conduct an abstract risk analysis as first step: They compile a list of (...) tier-1 suppliers within a reporting period of 12 months, and carry out the risk analysis in two steps: Step 1 (...) high-risk suppliers are identified (...) Step 2 identified high-risk suppliers undergo a more specific analysis in order to detect (...) potential risks'. However, no information was found of a process beyond tier-1 and high-risks suppliers. Furthermore, no detailed description of the process was found. [2024 Policy Statement Pursuant to the German Supply Chain Due Diligence Act (GSCA): <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Public disclosure of results of HRs risk assessment: In the GSCA 2024 Policy Statement the Company discloses the Human Rights Risk assessment conducted for Nordex SE and its subsidiaries, and Nordex Energy SE &amp; Co. KG, together: the Nordex Group. However, the results of the risk identification only mention Nordex SE and it is not clear if the risks are related to the entire group.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>[2024 Policy Statement Pursuant to the German Supply Chain Due Diligence Act (GSCA): <a href="https://nordex-online.com">nordex-online.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how assessment involved affected stakeholders: The company provided feedback to this indicator but the information was not material. [Integrated Annual Report 2024: <a href="https://nordex-online.com">nordex-online.com</a>]</li> </ul>
B.4	Integrating and acting on human rights risks and impact assessments	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Describes system to prevent, mitigate and remediate HRs issues: In its Human Rights Policy, the Company states some preventive measures such as consider human rights in internal governance processes, adequate training of employees, and improving grievance mechanisms. However, no evidence of their implementations was found. In its German Supply Chain Act Statement, the Company indicates that 'To minimize human rights related and environmental risks, the Nordex Group has established preventive measures in its own business area and vis-à-vis suppliers. In its own business area, the Nordex Group has implemented the following preventive measures: Human rights implementation strategy: It is defined in the Human Rights Policy, the Code of Conduct for Contractors and Suppliers, the Code of Conduct for Employees, and further topic-specific policies such as the Modern Slavery Policy (upcoming in 2024) and is considering the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. It is applied in the Nordex Group's value-added and support processes, such as in supplier selection, in the risk analysis, and in the complaints procedure. It is manifested in the Nordex Group's values of responsible business conduct and value-based compliance, and is implemented mainly by the processes laid out in the current document. Trainings: The Nordex Group fosters respect for human rights and environmental topics within the company through regular target group-oriented trainings for its employees. The Nordex Group hereby ensures that the employees have raised awareness to human rights and environmental obligations and its underlying values. In addition, the Nordex Group provides dedicated trainings in the relevant departments to ensure that the GSCA-related risk managers and risk owners have the necessary know-how and background to conduct the tasks assigned to them within the framework of GSCA-risk management. Procurement strategies and practices: The Nordex Group applies appropriate sourcing strategies and practices that consider human rights and environmental expectations, and that prevent or minimize potential risks in the Nordex Group's supply chain. [...] If a violation of human rights or an environment-related position has already occurred or is imminent, the Nordex Group takes appropriate remedial measures without undue delay, both in its own business area and at tier-1 suppliers, to prevent or terminate the violation or to minimize the extent of the violation'. [2024 Policy Statement Pursuant to the German Supply Chain Due Diligence Act (GSCA): <a href="https://nordex-online.com">nordex-online.com</a>] &amp; [Human Rights Policy: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Met: Describes how global system applies to supply chain: The company states 'When selecting suppliers, the Nordex Group considers human rights and environment related expectations and applies appropriate procurement strategies and practices that prevent from or minimize GSCA risks. This includes: Contractual assurance: The Nordex Group contractually obliges its tier-1 suppliers to apply the human rights and environment-related expectations of the Nordex Group in their operations, including the protected positions as defined by the GSCA. Furthermore, the contractual clauses oblige the suppliers to address human rights and environment-related expectations appropriately along their own supply chains, vis-à-vis their suppliers. The Nordex Group requires acceptance of this Code of Conduct in all suppliers' contracts from 01.01.2024 onwards. The Nordex Group provides trainings and information to suppliers with identified high risks, to raise awareness of GSCA-related positions and risks. The trainings are provided as e-learnings and their completing is tracked. For tier-2 suppliers, the Nordex Group takes appropriate measures on a case-by-case basis if there are actual and substantiated indications of high risks or violations at a tier-2 supplier which came to the attention of the Nordex Group. In addition, the Company also states that 'If a violation of human rights or an environment-related position has already occurred or is imminent, the Nordex Group takes appropriate remedial measures without undue delay...[']'. [Integrated Annual Report 2024: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Example of actions decided on at least 1 salient HRs issue: The Company state that during the reporting period, 28 cases of discrimination, including harassment, were reported. 118 complaints were filed through the company's channels for workforce members. There were no fines, penalties, or compensation resulting from the reported incidents and complaints. However, information reported is on complaints reported through whistleblowing system</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			and no information is found on actions to be taken on salient human rights impacts as a result of assessment processes. [Integrated Annual Report 2024: <a href="https://nordex-online.com">nordex-online.com</a> ] <ul style="list-style-type: none"> <li>• Not Met: Describes how stakeholders involved in decisions about actions taken: The Company states that "via the GSCA risk assessment, which is applying the OECD due diligence approach, the key risks which are impacting the value chain workers were identified. However, further identification, categorization and interaction with the value chain workers did not take place. The results of the GSCA risk assessment, as well as the role of the value chain workers and the Nordex Group's potential impact on them, are communicated to the Sourcing department management by the Human Rights &amp; Environmental Officer (HREO)." However, no further evidence found how affected stakeholders were involved in the decision about the actions taken in relation to salient human rights risks. [Integrated Annual Report 2024: <a href="https://nordex-online.com">nordex-online.com</a>]</li> </ul>
B.5	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> <li>• Not Met: Describes system for evaluation effectiveness of actions: The Company indicates that 'To comply with its human rights obligations, values, and implementation strategy, and to minimize related risks efficiently, the Nordex Group conducts risk-based control measures in its own business area.' With regards to measures taken in the supply chain the Company states 'At least once a year, as well as on an ad-hoc basis, the Nordex Group HREO reviews the effectiveness of the implemented preventive measures.' However, no description of the process employed to measure effectiveness was found. [2024 Policy Statement Pursuant to the German Supply Chain Due Diligence Act (GSCA): <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Example of lessons learned from evaluation effectiveness of actions</li> <li>• Not Met: Involves stakeholders in evaluation effectiveness of actions</li> </ul>
B.6	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> <li>• Not Met: Provides one example of comms with stakeholders: The Company indicates 'To comply with its human rights obligations, values, and implementation strategy, and to minimize related risks efficiently, the Nordex Group conducts risk-based control measures in its own business area.' However, no reports of communications with affected stakeholders regarding specific human rights issues raised by the stakeholders or on their behalf was found. [Sustainability Report 2023: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Describes challenges to effective comms and how it is working to address them</li> </ul>

### C. Remedies and grievance mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	2	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> <li>• Met: Grievance mechanism accessible to all workers: In its Sustainability Report, the Company states that 'Nordex Group employees, our business partner employees and the general public can use the 'notify!' whistleblower system to report any suspected misconduct or maladministration in connection with the Nordex Group's business activities. There are three reporting channels available: getting in touch personally with the staff of Corporate Compliance, using an online reporting portal, or using a central hotline / email / postal address. Reports can be submitted anonymously wherever this is not restricted by country-specific regulations. When reporting in good faith, the company protects the whistleblower from retaliation.' [Human Rights Policy: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Met: Grievance mechanism available in appropriate languages and workers made aware: In its Whistleblower System Policy, the Company states that the Online Portal is available in all company languages. In the Sustainability Report the Company states 'affected stakeholders regarding specific human rights issues raised by the stakeholders or on their behalf' [Whistleblower System Policy: <a href="https://nordex-online.com">nordex-online.com</a>] &amp; [Sustainability Report 2023: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Met: Describes how workers in supply chain access grievance mechanism: In its Code of Conduct for Contractors and Suppliers, the Company states that: 'Every Nordex Group representative, external stakeholders – including the employees of suppliers at any stage of the supply chain – and the general public, be they personally concerned or not, can submit a report via "notify!'. This Whistleblower System is open to all types of compliance violations, irrespective of topic.' In future assessments the Company will be expected to demonstrate this applies to all business relationships. [Code of Conduct for Contractors and Suppliers: <a href="https://nordex-online.com">nordex-online.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Expects business relationships to convey expectation to their business relationships: As above, the company's system is open to all. The company state that 'every Nordex Group representative, external stakeholders – including the employees of suppliers at any stage of the supply chain – and the general public, be they personally concerned or not, can submit a report via “notify!”'. This Whistleblower System is open to all types of compliance violations, irrespective of topic.'</li> </ul>
C.2	Grievance mechanism(s) for external individuals and communities	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism accessible to all external individuals and communities: In its Code of Conduct for Contractors and Suppliers, the Company states that: Every Nordex Group representative, external stakeholders – including the employees of suppliers at any stage of the supply chain – and the general public, be they personally concerned or not, can submit a report via “notify!”'. [Code of Conduct for Contractors and Suppliers: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: In its Whistleblower System Policy, the Company states that its online portal is available in all company languages and for any person inside or outside Nordex Group.' However, no information was found on how external individuals and communities are made aware of the existence of the channel if either through training or any specific communication that indicates these services are available to them. [Whistleblower System Policy: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Met: Describes how external individuals/communities access grievance mechanism: The company state that 'An individual who reports in good faith about suspected compliance violations that may cause substantial damage to the business, the integrity or the reputation of the Nordex Group, human rights, or the environment. A whistleblower according to the Nordex Group could be: an officer, director, manager, or employee of the Nordex Group; an employee of a business partner (e.g. supplier, contractor, subcontractor, service provider, customer); a person or an institution from the general public'. In addition, 'every Nordex Group representative, external stakeholders – including the employees of suppliers at any stage of the supply chain – and the general public, be they personally concerned or not, can submit a report via “notify!”'. This Whistleblower System is open to all types of compliance violations, irrespective of topic. [Whistleblower System Policy: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Expects business relationships to convey expectation to their business relationships: The Company states that 'An individual who reports in good faith about suspected compliance violations that may cause substantial damage to the business, the integrity or the reputation of the Nordex Group, human rights, or the environment. A whistleblower according to the Nordex Group could be: an officer, director, manager, or employee of the Nordex Group; an employee of a business partner (e.g. supplier, contractor, subcontractor, service provider, customer); a person or an institution from the general public'. However, no information is found on how the Company expects its business relationships to convey their expectation to their own business relationships. [Whistleblower System Policy: <a href="https://nordex-online.com">nordex-online.com</a>]</li> </ul>
C.3	Remedying adverse impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Describes approach taken to remedy adverse HRs impacts: The Company states 'Overall, we do not tolerate or condone the abuse of human rights in any part of our business or supply chains, and we take all allegations of abuse seriously. We will work to effectively remedy any incidence of human right abuse using our internal grievance mechanism.' It further states 'If a violation of human rights or an environment-related position has already occurred or is imminent, the Nordex Group takes appropriate remedial measures without undue delay, both in its own business area and at tier-1 suppliers, to prevent or terminate the violation or to minimize the extent of the violation. The type and scope of remedial measures depend in each case on the specific violation. At least once a year, as well as on an ad-hoc basis, the Nordex Group's HREO reviews the effectiveness of the implemented remedial actions.' However, no clear description of the approach the Company takes to remediate human rights violations was found. [2024 Policy Statement Pursuant to the German Supply Chain Due Diligence Act (GSCA): <a href="https://nordex-online.com">nordex-online.com</a>] &amp; [Sustainability Report 2023: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Describes changes to systems, processes and practices to prevent future impacts</li> <li>• Not Met: Describes approach to monitoring/implementing agreed remedy</li> </ul>

## 2. Salient human rights risks (40% of total)

### D. Indigenous Peoples' and Affected Communities' Rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.M	Commitment to respect indigenous peoples' rights	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> <li>• Not Met: Expectation of project developer clients to have a public commitment to respect indigenous rights</li> <li>• Not Met: Commitment to only work with business partners that respect FPIC</li> </ul>
D.2.M	Engagement with all affected communities	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> <li>• Not Met: Describes how local communities identified and engaged in the last two years: The Company indicates 'If a violation of human rights or an environment-related position has already occurred or is imminent, the Nordex Group takes appropriate remedial measures without undue delay, both in its own business area and at tier-1 suppliers, to prevent or terminate the violation or to minimize the extent of the violation. The type and scope of remedial measures depend in each case on the specific violation. At least once a year, as well as on an ad-hoc basis, the Nordex Group's HREO reviews the effectiveness of the implemented remedial actions.' However, no information was found on how the Company has identified and engaged local communities in the last two years. [Sustainability Report 2023: <a href="https://www.nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Provides two examples of engagement with communities: In its Sustainability Report, the Company brings examples of Community engagement based on CSR. For example: projects with focus on health, community gardening and circularity. It states 'In 2023, the Nordex Group made various financial and in-kind donations to local and regional aid organisations close to Nordex Group sites and wind farms. To foster education, we continued the Education and Socio-Economic Development (SED) Project in South Africa and support of women's career in Türkiye. In Brazil, the Nordex Group was involved in several projects and circularity.' However, no evidence of engagement with communities on human rights issues was found. [Sustainability Report 2023: <a href="https://www.nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Examples of engagement refer to marginalised groups and provide additional detail</li> <li>• Not Met: The company meets B2.C, B3.D, B4.D and B.5.C</li> </ul>
D.3.M	Benefit and ownership sharing policy	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> <li>• Not Met: Rewards for clients that have a commitment to identify potential benefit and ownership sharing</li> <li>• Not Met: Rewards for clients for disclosing statistics for each project (demographics of ownership sharing)</li> </ul>
D.4.M	Local wind & solar energy access, affordability	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> <li>• Not Met: Actions taken to support access and affordability of renewable energy in the value chain</li> <li>• Not Met: Public support for government policies addressing energy access</li> <li>• Not Met: Including a timebound action plan and reporting targets on supporting energy access and affordability in consultation with communities</li> </ul>

### E. Land and resource rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
E.1.M	Respect for land and natural resource tenure rights	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> <li>• Not Met: Expectation for clients to have commitment to respect land ownership/natural resources as in VGGT: The Company indicates in its Code of Conduct for Contractors and Suppliers that they are expecting business partners to 'Prohibit from unlawful eviction and unlawful taking of land, forests and waters in the acquisition, development or other use of land, forests and waters, the use of which secures the livelihood of a person.' However, it is unclear if this document covers the Company's business relationships in the downstream supply chain (project developer clients). Furthermore, the expectation does not specifically include an expectation to have a policy commitment regarding these issues. No reference was found to instances where land and ownership rights are customary and/or not formally recorded. [Code of Conduct for Contractors and Suppliers: <a href="https://www.nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Steps taken to use leverage to resolve land rights issues</li> </ul>
E.2.M	Just and fair physical and economic displacement policy implementation	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> <li>• Not Met: Expectations for clients to commit to IFC PS 5 for physical and economic displacements: The Company indicates in its Code of Conduct for Contractors and Suppliers that business relationships are expected to 'Prohibit from unlawful eviction and unlawful taking of land, forests and waters in the acquisition, development or other use of land, forests and waters, the use of which secures the livelihood of a person.' However, no reference to IFC Performance Standard 5 was</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
	n including free, prior and informed consent		found. Further, it is unclear if the expectation refers to clients. [Code of Conduct for Contractors and Suppliers: <a href="https://nordex-online.com">nordex-online.com</a> ] <ul style="list-style-type: none"> <li>• Not Met: Steps taken to use leverage</li> </ul>

## F. Security and conflict-affected areas

Indicator Code	Indicator name	Score (out of 2)	Explanation
F.1.M	Operating in or sourcing from conflict-affected areas	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> <li>• Not Met: Commitment to heightened HRDD in conflict affected areas: In its Sustainability Report, the Company states that 'In 2021, we investigated whether conflict minerals are sourced from conflict-affected or other high-risk areas (CAHRAs), and established due diligence measures to prevent the purchase of minerals from these areas'. Furthermore, its Code of Conduct for Contractors and Suppliers states that the Company expects from its suppliers to 'Assess the usage of conflict minerals (...) and investigate if they are sourced from conflict-affected and other high-risk areas'; and 'Establish due diligence measures to ensure compliance with all applicable regulatory requirements and to ensure that the sourcing of the minerals does not directly or indirectly finance or benefit armed groups in CAHRAs (...)'. However, it is unclear if the Company's commitment extends beyond sourcing conflict minerals. This indicator is looking for commitments to heightened human rights due diligence in conflict-affected or high risk areas in general. Furthermore, the statement found does not require heightened due diligence measures to be taken. The Company further indicates in the Code of Conduct for Employees that 'This also includes assessing whether the operations are located or sourced from conflict-affected or other high-risk areas. Additional due diligence measures are carried out to prevent purchasing minerals from conflict-affected or other high-risk areas.' However, this statement only requires additional HRDD measures to be carried out regarding the sourcing of conflict minerals. [Sustainability Report 2023: <a href="https://nordex-online.com">nordex-online.com</a>] &amp; [Code of Conduct for Contractors and Suppliers: <a href="https://nordex-online.com">nordex-online.com</a>]  <ul style="list-style-type: none"> <li>• Not Met: Steps taken to assess and mitigate these risks with conflict sensitive lens</li> <li>• Not Met: How stakeholders are involved in the process to mitigate risks</li> </ul> </li> </ul>
F.2.M	Evidence of security provider human rights assessments	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> <li>• Not Met: Description of implementation of security approach and example</li> <li>• Not Met: Description of monitoring of business partners: The Company states in its Code of Conduct for Contractors and Suppliers that it expects them to 'Prohibit from hiring or use of private or public security forces for the protection of the enterprise's project if, due to a lack of instruction or control on the part of the enterprise, the use of security forces is in violation of the prohibition of torture and cruel, inhumane or degrading treatment, damages life or limb or impairs the right to organize and the freedom of association.' However, it is unclear if this document applies to all business relationships.  <ul style="list-style-type: none"> <li>• Not Met: Local communities engaged in assessment of security</li> <li>• Not Met: Example of working with community on this issue</li> </ul> </li> </ul>

## G. Responsible mineral sourcing

Indicator Code	Indicator name	Score (out of 2)	Explanation
G.1.M	Responsible sourcing of minerals: arrangements with suppliers	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> <li>• Not Met: Policy statement on OECD Guidance aligned due diligence: The Company states in its Code of Conduct for Employees that 'Additional due diligence measures are carried out to prevent purchasing minerals from conflict-affected or other high-risk areas.' Regarding conflict minerals, the Company states in its Code of Conduct for Contractors and Suppliers that 'Assess the usage of conflict minerals (at least those identified by applicable EU regulation, currently tantalum, tin, tungsten and gold, see EU regulation (EU) 2017/821) and investigate if they are sourced from conflict-affected and other high-risk areas (CAHRAs). Establish due diligence measures to ensure the compliance with all applicable regulatory requirements and to ensure that the sourcing of the minerals does not directly or indirectly finance or benefit armed groups in CAHRAs or is not connected to abuses of international law, including human rights violations or environmental infringements.' However, there is no public statement indicating that the Company itself is committed to follow the OECD Guidance [Code of Conduct for Employees: <a href="https://nordex-online.com">nordex-online.com</a>] &amp; [Code of Conduct for Contractors and Suppliers: <a href="https://nordex-online.com">nordex-online.com</a>]  <ul style="list-style-type: none"> <li>• Not Met: The policy explicitly covers all minerals</li> </ul> </li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Policy expectations of business relationships: The Company states in its Code of Conduct for Contractors and Suppliers that it expects them to 'Assess the usage of conflict minerals (at least those identified by applicable EU regulation, currently tantalum, tin, tungsten and gold, see EU regulation (EU) 2017/821) and investigate if they are sourced from conflict-affected and other high-risk areas (CAHRAs). Establish due diligence measures to ensure the compliance with all applicable regulatory requirements and to ensure that the sourcing of the minerals does not directly or indirectly finance or benefit armed groups in CAHRAs or is not connected to abuses of international law, including human rights violations or environmental infringements.' However, no clear expectation was found for suppliers to follow the OECD guidance. [Code of Conduct for Contractors and Suppliers: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Contractual requirement for smelters/refiners to follow OECD</li> </ul>
G.2.M	Responsible sourcing of minerals: mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Identification and mapping of suppliers: In its Sustainability Report, the Company states that 'In 2023 reporting year, the Nordex Group worked with around 9,455 suppliers', which indicates that it has mapped and identified some of its suppliers. However, it is not clear if this includes both direct and indirect suppliers [Sustainability Report 2023: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Traceability system for mineral supply chain</li> <li>• Not Met: Discloses smelters/refiners that are most significant part of supply chain: In its Sustainability Report, the Company brings a table with its suppliers' countries of origin in percentage; however, it does not disclose their names or specifies how it has defined what are the most significant parts of its supply chain. [Sustainability Report 2023: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Suppliers in higher risk activities, geographies, products: In its Sustainability Report, the Company state that 'we identified a low risk of sourcing from CAHRAs in this assessment in 2021, and an extremely low amount of [tin, tungsten, tantalum, and gold]'; However, it does not disclose which direct or indirect suppliers are considered to be involved in high risk activities, geographies and products. [Sustainability Report 2023: <a href="https://nordex-online.com">nordex-online.com</a>]</li> </ul>
G.3.M	Responsible sourcing of minerals: risk identification in mineral supply chains	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Identification and prioritising of risks in supply chain</li> <li>• Not Met: Description of process to identify smelters/refiners and whether they carry out DD</li> <li>• Not Met: Disclosure of qualified smelters/refiners</li> <li>• Not Met: Processes cover minerals assessed as highest risk</li> </ul>

## H. Protection of human rights and environmental defenders

Indicator Code	Indicator name	Score (out of 2)	Explanation
H.1.M	Commitment to respect the rights of human rights and environmental defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Zero tolerance of threats/attacks on HRDs</li> <li>• Not Met: Expectation on business partners in value chain to make this commitment</li> <li>• Not Met: Description of how working with HRDs as part of risk assessment and DD</li> <li>• Not Met: Description of how working with HRDs to create safe and enabling environment</li> </ul>

## I. Labour rights (incl. protection against forced labour)

Indicator Code	Indicator name	Score (out of 2)	Explanation
I.1.M	Health and safety	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Discloses quantitative information on H&amp;S in own operations (injury rate or lost days and fatalities) in last reporting period: In its Sustainability Report, the Company states 'We regularly communicate our performance in terms of occupational health and safety within the Nordex Group via the intranet, as well as in employee information sessions and management meetings'. Furthermore, it discloses quantitative data regarding accidents and lost time as Lost Time Injury Frequency (LTIs/1,000,000 work hours). In 2023 it reports that number as 1.2. It states that 'The Nordex Group had no fatalities to report in 2023.' [Sustainability Report 2023: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Expects disclosure of H&amp;S information of relevant business relationships: In its Code of Conduct for Contractors and Suppliers, the Company states that it is expected from suppliers to 'maintain a suitable and systematic approach to Quality, Health, and Safety (e.g., in accordance with ISO 45001/OHSAS 18001, ISO 9001, or national equivalent), designed to ensure compliance with all applicable laws and regulations and to achieve continuous improvement'.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>However, it does not describe processes or request for quantitative information. [Code of Conduct for Contractors and Suppliers: <a href="https://nordex-online.com">nordex-online.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Targets for H&amp;S performance (including injury rates or lost days and fatalities): In its Sustainability Report, the Company states that 'The Nordex Group pursues a long-term target of zero occupational accidents. We, therefore, regularly measure our performance against a range of parameters to continually review the effectiveness of the measures taken to improve our safety culture. The Company also reports on its goal of reducing the frequency of lost time injuries (LTIF) reaching and LTIF ratio of 1.45 for the full year 2024. In its 2025, its goal is to achieve an LTIF below 1.5 by 2025. However, no information is found on the targets related with fatalities.</li> </ul> <p>[Sustainability Report 2023: <a href="https://nordex-online.com">nordex-online.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: The Company describes the process(es) it has in place to identify its health and safety risks and impacts: In its Sustainability Report, the Company states 'We continuously and systematically strive to further develop our safety culture and make our work environment safer. As a result, we consult with our own employees, work councils as well as our business partners and subcontractors to incorporate the widest possible range of knowledge into our daily work. (...) We created a comprehensive Corporate HSE Manual in 2023 to incorporate the Policy, our 12 vision statements, responsibilities and arrangements for HSE throughout the Nordex Group. This has been communicated to all employees. Strategic projects to improve HSE performance and culture have been consolidated into one program with regular reviews and status updates'. in addition, The Company also states that it has 'identified workplace accidents and injuries as potential negative impacts, particularly during the implementation of new projects, as new employees and subcontractors need to be familiarized with safety standards. However, it does not explain its process of identifying H&amp;S risks. [Sustainability Report 2023: <a href="https://nordex-online.com">nordex-online.com</a>]</li> </ul>
I.2.M	Forced labour risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Board level oversight over policies on forced labour in supply chain. How relevant stakeholders informed board discussions: In its Forced Labor &amp; Modern Slavery Policy, the Company states that the responsibility for ensuring adherence to those commitments falls within the Company's Board. 'Our senior management has responsibility for overseeing their implementation and ensuring that any breaches of this Policy or any of its related policies and procedures are investigated'. However, there is no evidence that the experiences of affected people has informed board discussions. Furthermore, no specific board member or board committee was found to have been tasked with oversight of forced labour policies. [Forced Labor &amp; Modern Slavery Policy: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Capacity building with suppliers</li> <li>• Not Met: Discloses ongoing efforts to prevent and mitigate forced labour in own ops and supply chain: In its Forced Labor &amp; Modern Slavery Policy, the Company states that 'to tackle forced labor and modern slavery throughout our supply chains, we are committed to ensuring there is transparency in our business and in our approach. Our processes for human rights related due diligence in our operations and in our value chain build on the OECD due diligence approach for responsible business conduct'. However, no detailed description of the efforts undertaken to address forced labour issues in its own operations and supply chain have been found. [Forced Labor &amp; Modern Slavery Policy: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Factors to be considered when ending a business relationship incl. responsible disengagement: In its Forced Labor &amp; Modern Slavery Policy, the Company states that 'We may terminate the relationship with other individuals and organizations working on our behalf, and with subcontractors or suppliers, if they breach this policy'. However, it does not describe what factors would inform this decision. It is not clear the factors it would consider when deciding whether to end the business relationship if it is not able to adequately use leverage to prevent or mitigate adverse impacts, in the context of forced labour risk management (i.e. relevancy of the supplier, responsible exit). [Forced Labor &amp; Modern Slavery Policy: <a href="https://nordex-online.com">nordex-online.com</a>]</li> </ul>
I.3.M	Prohibition of forced labour: Wage practices	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Employer Pays Principle in policy for own ops and supply chain: The Company states in its Forced Labour &amp; Modern Slavery Policy that 'Our workers are never required to pay a fee to us or an intermediary to get hired, and Our workers retain control of their personal documents, such as birth certificates, passports, work permits, residence permits, or identity cards.' The Company describes that 'The Forced Labor &amp; Modern Slavery Policy describes the Nordex Group's aim and</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>objectives in eliminating any form of forced labour and modern slavery at the Nordex Group, at its partner organizations, and in its value chain. The policy applies to all employees of the Nordex Group in any capacity and location, and to subcontractors, suppliers and partner organizations of the Nordex Group or any of its agencies.' [Forced Labor &amp; Modern Slavery Policy: <a href="https://nordex-online.com">nordex-online.com</a>] &amp; [Code of Conduct for Contractors and Suppliers: <a href="https://nordex-online.com">nordex-online.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers on paying workers regularly, in full and on time</li> <li>• Not Met: Description of implementation and monitoring of this practice</li> <li>• Not Met: Requirements on paying in full and on time in supplier codes and contracts: In its Forced Labor &amp; Modern Slavery Policy, the Company clarifies that 'We do not use irregular, delayed, deferred or non-payment of wages as a means to bind workers to us. No non-cash or 'in-kind' payments are used as a means to create a state of dependency of the worker on the company'. However, it does not indicate that it requires suppliers to pay workers directly, in full and on time. [Forced Labor &amp; Modern Slavery Policy: <a href="https://nordex-online.com">nordex-online.com</a>]</li> </ul>
I.4.M	Prohibition of forced labour: Restrictions on workers	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Requirements on free movement in supplier codes and contracts and own operations: In its Forced Labor &amp; Modern Slavery Policy, the Company states that 'Our workers retain control of their personal documents, such as birth certificates, passports, work permits, residence permits, or identity cards.' However, no requirement was found for suppliers that prohibits retaining workers' personal documents. No evidence was found of a policy prohibiting the restriction of workers' freedom of movement or requiring workers to use Company provided accommodation. [Forced Labor &amp; Modern Slavery Policy: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Describes working with suppliers on free movement of workers</li> <li>• Not Met: Description of implementation and monitoring of this practice</li> </ul>
I.5.M	Freedom of association and collective bargaining	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment on FoA/CB and requirements in suppliers codes and contracts: In its Code of Conduct for Contractors and Suppliers, the Company indicates that it expects from its business partners to 'comply with all applicable laws and regulations on freedom of association and collective bargaining.'; and in its Human Rights Policy, it commits to address key issues (...) including (...) right to freedom of association'. However, there is no description of measures put in place to prohibit any form of intimidation, harassment, etc. [Code of Conduct for Contractors and Suppliers: <a href="https://nordex-online.com">nordex-online.com</a>] &amp; [Human Rights Policy: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Describes work with suppliers on FoA/CB: Even though the Code of Conduct for Contractors and Suppliers states that it is expected suppliers to comply with laws on freedom of association and collective bargaining, no description of how the Company works to support supplier practices were found. [Code of Conduct for Contractors and Suppliers: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Assessment of scope of restriction of FoA/CB in supply chain: The Company reports that the percentage of Nordex employees covered by collective bargaining agreements is 83%. The Company also reports collective bargaining coverage for employees – EEA (European Economic Area) and employees – Non-EEA. For example, the coverage rate for employees – EEA is below 19%. However, we found no information in regards the coverage of employees in its supply chain. [Integrated Annual Report 2024: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Global Framework Agreement</li> </ul>
I.6.M	Living wage (in supply chains)	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Requirements on living wage in supplier codes and contracts: In its Code of Conduct for Contractors and Suppliers, the Company indicates the expectation of its suppliers to 'Provide fair remuneration in line with the applicable national statute'. [Code of Conduct for Contractors and Suppliers: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Describes work with suppliers on living wage</li> <li>• Not Met: Description of process to determine living wages with unions: The Company indicates that ' We comply with all applicable laws and industry standards on fair wages' However, it is not clear if fair wages indicate living wages. Furthermore, no evidence was found on how unions and other workers representative bodies are involved in the determination of living wages. [Code of Conduct for Employees: <a href="https://nordex-online.com">nordex-online.com</a>]</li> </ul>

## J. Right to a healthy and clean environment

Indicator Code	Indicator name	Score (out of 2)	Explanation
J.1.M	Environmental impact assessment and remediation	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> <li>• Not Met: Expectation for business partners to conduct EIA</li> <li>• Not Met: Expectation for business partners to publish EIA: Although it states in the Code of Conduct for Contractors and Suppliers that it is expected that they 'reduce environmental impacts to a minimum', it does not require them to publish their impact assessments. [Code of Conduct for Contractors and Suppliers: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Expectation for business partners to explain CIA</li> </ul>
J.2.M	Life cycle assessment	1	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> <li>• Met: Conducts regular public life cycle assessments: The Company reports that 'We perform life cycle assessments (LCAs) according to ISO 14040 and ISO 14044 to evaluate the environmental impacts of our products in order to identify optimization potential and track improvements.' The Company published its first LCA report 2020 and analysed four more turbine types since then. [Nordex Sustainable Products: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Reports on progress made on action plan</li> </ul>

## K. Transparency and anti-corruption

Indicator Code	Indicator name	Score (out of 2)	Explanation
K.1.M	Anti-corruption due diligence and reporting	0.6667	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> <li>• Met: Commitment to prohibiting bribes to public officials: In its Code of Conduct for Employees, the Company states that 'We have a zero-tolerance policy for all forms of corruption. Any kind of active or passive bribe with the aim of influencing or receiving a benefit for the Nordex Group, its employees, or third parties, is strictly prohibited. Illegal contributions to public officials, and candidates for political parties and organizations are forbidden. We require all those we work with to adhere to these same standards. A BRIBE is the act of offering, promising, giving, accepting or soliciting anything of value, financial or non-financial, directly or indirectly (through a third party), to any public official or public or private employee to obtain an improper business advantage. A bribe is not only cash, but it could also include gifts, facilitation payments, kickbacks or donations.' [Code of Conduct for Employees: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Expectation extends to relevant business relationships: In its Code of Conduct for Contractors and Suppliers, the Company states that it is expected that their business partners 'Do not tolerate, permit or engage in bribery corruption associated with state agents and private-to-private corruption(...)'. However, it is not clear if this document applies to all business relationships. Furthermore, no clear expectation to not to engage in any active or passive act of bribery and corruption of public officials or employees of business relationships, or their relatives and associates, directly or through business intermediaries was found. [Code of Conduct for Contractors and Suppliers: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Reports on any complaints on corruption and bribery: In its Sustainability Report, the Company states that 'No significant corruption risks were identified in the reporting period'. In addition, the Company has mandatory online trainings on Prevention of Bribery and Corruption and Code of Conduct for its employees worldwide. However, no information found if there were any complaints or concerns received regarding corruption. [Sustainability Report 2023: <a href="https://nordex-online.com">nordex-online.com</a>]</li> </ul>
K.2.M	Payments to governments & contract transparency	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> <li>• Not Met: Publishing a tax CbCR in line with GRI 207-4, or</li> <li>• Not Met: Disclosure of terms, contracts, agreements for those payments</li> <li>• Not Met: Supports governments to disclose contracts and licenses on renewable energy project in line with EITI</li> <li>• Not Met: Expectation for project developers clients to disclose payments to governments at project level (including on land and natural resources)</li> </ul>

## L. Diversity, equality and inclusion

Indicator Code	Indicator name	Score (out of 2)	Explanation
L.1.M	Diversity, equality & inclusion training for management and employees	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> <li>• Not Met: Provides mandatory and regular training as per ILO No 190: In its Diversity &amp; Inclusion Policy the Company commits to 'provide support to adhere to this policy in the form of procedures, work instructions and guidelines and ensure adequate training is provided'. However, it does not expand on frequency of</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>trainings and how this is conducted. No reference made to ILO Convention 190. [Diversity &amp; Inclusion Policy: <a href="https://nordex-online.com">nordex-online.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Requires suppliers to provide training</li> <li>• Not Met: Provides materials and access to resources for trainings</li> <li>• Not Met: The trainings include gender-based violence and the Company's policies and mechanisms for addressing it</li> </ul>
L.2.M	Gender balance and sensitivity	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Timebound action plan to integrate gender lens to all relevant documents</li> <li>• Not Met: Demonstrates progress through annual reporting: In its Sustainability Report, the Company shows in a graphic quantitative data regarding the progress of diversity and inclusion. However, it is unclear what measures (or lack thereof) led to these numbers. [Sustainability Report 2023: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Women and non-binary people make up at least 40% of the Company's executives: There are no indicators of non-binary people in the graphic disclosed; The Company indicates that the proportion of female leaders/managers was 18.9% in the last reporting period. [Sustainability Report 2023: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Women and non-binary people make up at least 40% of the Company's board of directors: The Company indicates that the 'current share' of women on the Supervisory Board is 33.3%. This is not meeting the requirement under this indicators. [Sustainability Report 2023: <a href="https://nordex-online.com">nordex-online.com</a>]</li> </ul>
L.3.M	Gender wage gap reporting	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Has closed gender wage gap or timebound commitment: The Company states that it has conducted a comprehensive gender pay gap analysis across all locations. It reports that when comparing female and male employees, without considering any grades or job types, the analysis revealed that female employees earn 9.26% more than male employees. At the management level, male employees earn 21.96% more than female employees, 9.73% more in the white-collar category, and 13.20% more in the blue-collar category. The Company explains that the apparent discrepancy arises because the Nordex Group has a comparatively small proportion of female employees. However, no information is found on its goals and timebound commitment for closing the gender wage gap [Integrated Annual Report 2024: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Reports information at company level across multiple pay bands</li> <li>• Not Met: Expects business relationships to do the same</li> </ul>

## JT. Just transition

Indicator Code	Indicator name	Score (out of 2)	Explanation
JT.3.M	Fundamentals of creating and providing or supporting access to green and decent jobs for an inclusive and balanced workforce	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Public Commitment to create and provide or support access to green and decent jobs, as part of the low carbon transition.: There is no mention of job creation, but the quantitative data shown in its Sustainability Report shows an increase in the number of employees, which are considered green jobs for 100% renewable energy companies. [Sustainability Report 2023: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Demonstrates measures taken to create and support access to green and decent jobs for affected stakeholders.: The company provided feedback to this indicator but information was not material</li> <li>• Not Met: Demonstrates measures taken to ensure green and decent jobs promoting equality of opportunity for women and vulnerable groups: The company provided feedback to this indicator but information was not material</li> </ul>
JT.4.M	Fundamentals of retaining and re- and/or up-skilling workers for an inclusive and balanced workforce	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Public commitment to re-and/or up-skills workers displaced by the transition to a low carbon economy.</li> <li>• Not Met: Disclosure of its process(es) for identifying skills gaps for workers and affected stakeholders, in the context of the low carbon transition.</li> <li>• Not Met: Demonstrates measures taken to provide re-and/or upskilling, training or education opportunities for relevant stakeholders.: In its Sustainability Report, the Company describes an Employee Development program that 'help ensure that our employees remain well trained, feel a sense of belonging in the company, and are encouraged to grow'. These trainings can be taken in consideration regarding Just Transition, as it is in the context of renewables. However, it is limited for employees, not all relevant stakeholders are considered. [Sustainability Report 2023: <a href="https://nordex-online.com">nordex-online.com</a>]</li> <li>• Not Met: Demonstrates measures taken to ensure that the re-and/or upskilling, training or education opportunities promoting equality of opportunity for women and vulnerable groups.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
JT.6.M	Fundamentals of advocacy for policies and regulation on green and decent job creation, employee retention, education and reskilling, and social protection supporting a just transition	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses process(es) for aligning its lobbying activities with policies and regulation supporting the just transition.</li> <li>• Not Met: Discloses where its lobbying activities do not align with policies and regulation that support the just transition.</li> <li>• Not Met: Discloses action plan addressing misalignment of lobbying activities with policies and regulation that support just transition.</li> <li>• Not Met: Demonstrates lobbying for just transition and regulations enabling green and decent jobs, reskilling and/or social protection</li> </ul>

### 3.a Response to risk of exposure to forced labour (10% of total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(0).0	Serious risks of supply chain forced labour		No allegations meeting the REB severity thresholds under this heading were found

### 3.b Serious Allegations (10% of total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(1).0	Serious allegation No 1		No allegations meeting the REB severity thresholds under this heading were found

#### Disclaimer

This scorecard is based on assessments of publicly available documents on companies' websites by the EIRIS Foundation and BHRRC. Preliminary assessments were shared with companies for feedback. Feedback provided by companies has been analysed and incorporated when relevant to the indicator assessed. Information published or provided by companies after established and communicated cut-off dates\* are not included for this year's Benchmark. As such this scorecard should be seen as a reflection of feedback received as of April 2025.

The use of the label "Not met" in the research does not necessarily mean that the company does not meet the requirements as they are described in the accompanying bullet point short text. Rather, it means that the analysts could not find information in public sources that met the requirements as described in full in the 2025 Renewable Energy & Human Rights Methodology document. It is possible that a Company meets the criteria without yet publishing the relevant evidence of doing so. This may include cases where a company has claimed to meet the criteria in the engagement phase or otherwise but where the public record was still not sufficient to meet the criteria by the relevant cut off dates.

While the EIRIS Foundations and BHRRC have made reasonable endeavours to ensure that the methodology reflects best and emerging business and human rights practice in identifying, preventing, mitigating and remedying human rights harms as well as other responsible business conduct, it is not currently possible to measure certain human rights harms or other negative impacts directly. As such, a low score in respect of a particular indicator should not be read as implying that harms are necessarily taking place: rather it is a sign that companies have not demonstrated the steps set out in the methodology to reduce the risk of such harms or to uphold other responsible business conduct in the ways described. Conversely, a high score in a particular section or for a specific indicator should not be interpreted as a guarantee of future absence of human rights harm.

**Scores for companies in the different project developer sub-categories (electric utilities, oil and gas, independent power producers) should not be compared to one another** as these categories have been designed to allow for integration of an assessment of efforts towards full decarbonisation of energy production for project developers and oil and gas companies, based on the World Benchmarking Alliance's Oil & Gas and Electric Utilities Benchmark, using ACT methodologies. **Scores for equipment (wind turbines and solar) manufacturers should not be compared to project developer scores** as indicators have been tailored to reflect their position in renewable energy value chains.

Caution should be exercised in interpreting small differences in scores between companies within the same category and particularly small differences in the overall weighted scores because of the diversity of independent elements that are combined to produce the overall weighted scores. Scores should be understood in the context of the methods and weightings explained in the Methodology.

BHRRC does not make any guarantee or other promise, representation, or warranty as to the truth, accuracy, reliability or completeness of the statements of fact contained within, or any results that may be obtained from using its content. BHRRC does not have any obligation to provide the users of the Benchmark with additional information or to update the information contained therein or to correct any inaccuracies. That said, the assessment process has been conducted by BHRRC and its research partner the EIRIS Foundation in good faith and in the spirit of dialogue and cooperation.

\* Cut-off dates: 31 January 2025 for companies that did not engage with the benchmark; the expiration of the feedback period (25 April 2025) for companies that engaged with the benchmark and provided additional documents published during that period.

Neither this content, nor any examples cited, constitute investment advice, nor should it be used to make any investment decision without first consulting one's own financial advisor and conducting one's own research and due diligence. BHRRRC does not receive any payment, compensation, or fee for the use or citation of any information included in this content. To the maximum extent permitted by law, BHRRRC disclaims any and all liability in the event any information, commentary, analysis, opinions, advice, and/or recommendations prove to be inaccurate, incomplete, or unreliable, or result in any investment or other losses. We reserve the right to disallow users from further using our data if, in our assessment, these are used to attempt, perpetuate, or cause harm and violations of human rights.

*This work is the product of the Business & Human Rights Resource Centre, licensed under a Creative Commons [Attribution-NonCommercial-ShareAlike 4.0 International License](#). Commercial use of this material or any part of it will require a license. Those wishing to commercialise the use of this work should contact the Business & Human Rights Resource Centre. Indicators in Themes A, B, C, JT and first section of M and Low-Carbon Transition scores (ACT) are the product of the World Benchmarking Alliance. Our work is licensed under the Creative Commons Attribution 4.0 International License. To view a copy of this license, visit [creativecommons.org](https://creativecommons.org/licenses/by-nc-sa/4.0/)*